GPU Nuclear

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Writer's Direct Dial Number:

April 15, 1983

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Eisenhut:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Cycle 10 Refueling Outage Workload

As discussed in our meetings with your staffs, the most recent being on March 18, 1983, the workload associated with the present Oyster Creek refueling outage is at the point where increases in scope, if executed, would have a negative impact on plant safety and could severely strain site capability. This situation has resulted from: (1) a better definition of construction field support resources now that engineering is complete, (2) additional required projects; as a result of initial plant inspections, and (3) additional regulatory required projects (i.e., recirculation system piping inspection and post accident sampling).

By letter dated January 17, 1983, Mr. Crutchfield expressed the current staff position on a number of items that we had requested deferral of by our letter dated December 24, 1981. In our effort to be responsive to that letter, we have undertaken the following actions:

1. By separate letter dated March 24, 1983, we have agreed to implement item II.E.4.2.7 (Hi-radiation Isolation of Vent and Purge Valves), if the final NRC position requires it. As discussed in our December 24, 1981 letter, we are unable to complete this modification until the next scheduled refueling outage. This delay is necessary because the workload and schedule of the current outage do not permit completion of this modification. It is also anticipated that the current outage will not permit enough lead time to complete the engineering and procurement of the necessary hardware. Additionally, our conceptual design of the modification had intended to utilize the signal from the Containment Hi-Range Radiation Monitor as part of the design and as indicated in Mr. Crutchfield's letter of January 17, 1983, the Containment Hi-Range Radiation modification will not be completed until

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the cycle 11 refueling outage. Justification for the delayed implementation schedule was provided in our correspondence dated October 19, 1981 and February 25, 1982.

2. We hereby agree to implement NUREG 0737 item II.B.3 (Post Accident Sampling). However, based upon the current outage work load, we require a phased completion of the modifications that will have the system in service 6-9 months after startup from the present refueling outage. During the current refueling outage, as a minimum, all work necessary to be done while the plant is shutdown will be completed. In addition, we will make a best effort to complete the project as soon as possible consistent with, but not interferring with, other modifications. The latest the system will be in service is nine (9) months after startup.

3. We have reassessed all outage related work with the goal of eliminating or deferring tasks, with the minimum impact on safety. Attachment 1 to this letter lists those regulatory items we have concluded can be deferred or eliminated which allow us to complete the proposed work in item 2 above. Included in the attachment is a discussion which addresses compensatory measures to be conducted, final completion date and the justification for permitting the deferral of each item.

As discussed with you and your staff on March 18th, we are proposing to defer three (3) regulatory and eight (8) non-regulatory work items for the current outage. In selecting the items for deferral, we have considered and factored in the following key elements:

1. manpower needed,
2. time for installation,
3. ALARA concerns,
4. interference with other projects,
5. the direct safety impact of the project,
6. the extent to which engineering and construction are completed,
7. the relative safety impact of the project as compared to others,
8. the indirect safety implications of an overburdened outage.

While this includes many qualitative elements, we believe it provides a sound basis for deferring and canceling certain outage work items. We, therefore, request that you grant us a delay of up to one operating cycle for completion of these items. We also request that you act on this matter in a timely fashion, and in support of that, we would be glad to confer with you on any item that might require additional clarification.

If you should have any questions, please contact Mr. Jim Knubel (201) 299-2264.

Very truly yours,

Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF:jal
Enclosures

cc: Regional Administrator
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NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, NJ 08731

Attachment #1

A. The following is a list of items for which deferral from the current refueling outage is proposed.

Item	Regulatory Commit. Source	Remarks
Masonry Walls	I & E Bulletin 80-11	Defer until after startup - latest completion Cycle 11 outage
Torus Room Water Tight Door Alarms	I & E Inspection 80-14	Defer until after startup latest completion Cycle 11 outage
SBGTS Filter Tie-in	NUREG 0737 II.B.11	Cancel

B. Item for Deferral

The following is a brief description with justification for delays or cancellation.

1. Masonry Wall Seismic Upgrade

This project was initiated in response to IE Bulletin No. 80-11. On March 31, 1983, members of your Staff visited the Oyster Creek Site in order to survey the affected walls. This Site visit did provide your Staff with a better understanding of the scope of work involved and provided them with more information for evaluating our request. Also, during this Site visit we agreed to provide you with a more detailed evaluation of each wall affected, its potential impact on safety related equipment, schedules for completion and further justification. We expect this more detailed evaluation will be forwarded to you by May 2, 1983.

2. Torus Room Water Tight Doors

As identified in I & E Inspection Report 80-14 and our response dated September 21, 1981, there has existed a problem in ensuring that the ECCS Corner Room Water Tight doors are properly closed. It was our intention to install an alarm with remote annunciation on each door during the current refueling outage. It is now our intent to delay that modification until the Cycle 11 refueling outage. The doors in question will be locked with key issuance under the control of the Group Shift Supervisor.

3. Standby Gas Treatment System (SBGTS) Filter Tie-in)

Shortly after the issuance of NUREG 0578, TMI Lessons Learned, GPUN had proposed to have the tie-in installed on the SBGTS as an additional precaution. The reason for this decision was based upon a belief that the SBGST filers might need changing sometime during an accident and the filter area would be inaccessible due to high radiation. No analysis was done at that time to

ascertain the need for this modification. Based upon our discussions with your staff on March 18, 1983, we have assessed the basis for a SBGTS filter tie-in. In evaluating the need for this modification, we reviewed the effort undertaken by ourselves and the NRC Staff in addressing similar concerns as part of the Systematic Evaluation Program (SEP). Under the SEP Topic XV-19, "Loss-of-Coolant Accidents Resulting from a Spectrum of Postulated Piping Breaks Within the Reactor Coolant Pressure Boundary", the radiological consequences of LOCA's were evaluated by the NRC Staff. The results of those analyses demonstrated that the major contributor to offsite doses was Main Steam Isolation Valve (MSIV) leakage and that a single SBGTS filter train was capable of handling the entire accident. Based upon the SEP evaluation of this topic, we intend to cancel this project.