



GPU Nuclear
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Parsippany, New Jersey 07054
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TELEX 136-482
Writer's Direct Dial Number:

July 22, 1982

Dr. Thomas E. Murley, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Dear Mr. Murley:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Bulletin 82-03

Recently we have received several inquiries and requests from members of your staff with regard to the subject bulletin which have the potential to cause considerable delay in our current refueling/maintenance outage. As you are aware, we have supplied the required information and conducted the necessary inspections detailed in IE Bulletin 82-03. In addition, at our request, a meeting was held at Regional Headquarters to discuss our program in detail and the current results. We feel the NRC has been kept completely informed regarding the program development, content, and findings.

In recognition of the importance of this issue, we have developed a recirculation loop inspection program that provides a high degree of assurance that any intergranular stress corrosion cracking (IGSCC) will be detected and characterized. In comparing our program to that specified in I.E. Bulletin 82-03, we have concluded that it exceeds the requirements of that bulletin, especially in the area of weld sample selection and indication characterization.

During the week of July 11, 1983, your staff conducted an inspection of the program results. It was indicated during the exit interview that nothing was found technically wrong with our approach. It was stated that an NRC team would be visiting the site to conduct an independent

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confirmatory inspection of selected welds. At that time Mr. P. B. Fiedler informed your staff and the resident inspectors that such an inspection would have an impact on our current outage and in order to minimize that impact, certain information and coordination was necessary. Attached to this letter is a copy of the written request for that information. Mr. Fiedler also stated that certain work activities, such as reinsulation of pipes, removal of scaffolding and the reassembly of valves, had been halted to accommodate the inspection. Responses to most of these questions were transmitted orally via the resident inspector. Based on the oral response to our questions, an entrance meeting was scheduled for the morning of July 25, 1983. Also scheduled for that date were the required plant specific training and respirator qualification tests for the NRC team. On the morning of July 20, 1983, a conference call was requested by the senior resident to discuss details of the upcoming inspection. We were at that time informed that the NRC plans had changed. The inspection was not to commence on July 25, 1983 as originally stated. Instead, a 100% review of the Oyster Creek inspection data would take place during the week of July 25, 1983. Then, based upon the review of the inspection records, the NRC weld inspections would commence during the following week.

While we share your staff's desire to obtain all reasonable information necessary to satisfactorily close out I.E. Bulletin 82-03 for Oyster Creek and beyond that, to obtain as much information as reasonable on the generic issue of BWR pipe cracking; we are concerned the necessary coordination and planning is not taking place and excessive burdens may be incurred on the outage as well as the NRC not receiving maximum benefit from your planned inspection.

Our concerns fall into three areas: First, it appears as if members of your staff have been making contacts with a number of individuals within GPU Nuclear on parts of the overall inspection effort, and making requests that these individuals cannot be expected to respond to spontaneously.

Secondly, your staff seems to be seriously considering requiring a liquid penetrant test (PT) of two indications. We believe technically this is not required to establish the indication characteristics and the required grinding may leave the surface susceptible to future IGSCC.

Finally, we are concerned at not being able to develop a detail plan, considering all scheduling and interacting outage work when putting together the confirmatory inspection program. There have been several expansions in the scope of the inspection and your staff has requested that special plant conditions be established for their inspection team above and beyond what would normally be done for our own personnel. These factors can have a significant impact on our outage schedule.

In order to alleviate these problems, we request that:

1. Any request for commitments from GPU Nuclear be processed through the normal communications channel established between the onsite resident inspector and the onsite licensing manager.
2. Any request to perform a PT of any indication should have a sound technical bases and that your staff review our inspection data and our bases for not performing a PT.
3. Your staff work with us to insure any outage impact be minimized while at the same time meeting the objective of your confirmatory inspection program.
4. In order to assist us in supporting this effort we request written responses be provided to the attached questions.

If you have any questions, please contact me or Mr. M. Laggart (609-971-4643) of my Staff.

Very truly yours,

PR Clark
P. R. Clark *by RFW*
Executive Vice President

/lr

Encl.

cc: Oyster Creek Resident Inspector
P. O. Box 388
Forked River, NJ

Inter-Office Memorandum



Date July 15, 1983
OCMO 83-029

Subject Third Party Inspection

To C. Cowgill
Senior Resident Inspector
Oyster Creek N.G.S.

Location Oyster Creek

We are pleased that the NRC will be bringing in a third party UT Inspection Team to validate the 82-03 Inspection Program on our recirculation pipe. We would appreciate the following information:

1. When will the inspection team arrive?
2. Which welds will the team be working on?
 - a. new welds
 - b. welds with indications
 - c. D-11, B-5
 - d. combination of the above

We need this information ASAP so that we can proceed with reinsulation of pipes and removal of scaffolding.

3. Will the examination be:
 - a. a verification of our indications
 - b. a new inspection
4. Will the team use procedures qualified to 82-03 or 83-02?
5. Will the team members be qualified to 82-03 or 83-02?
6. Will the team use our calibration standards, certified couplant, etc.?
7. Who will correlate the data?
8. Will the correlation of data be done immediately? On site?
9. What if the data is conflicting? Who will be the referee?
10. How will conflicts be resolved?

As a general note, we estimate radiation levels approximately 1/3 higher than those listed in the historical exposure data for each inspected weld since the vessel is drained.

If there are any questions, please contact Clark Tracy at 609-971-4145.

Thank you,

A handwritten signature in cursive script that reads "Clark Tracy".
Clark R. Tracy

cc: S. Reynolds, J. Thomas, M. Laggart,
N. Kazanas, P. Fiedler, T. Patterson, J. Chardos
R. Joffe