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Writer's Direct Dial Number:

C321-94-2177  
November 17, 1994

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection Report 50-219/94-18  
Reply to a Notice of Violation

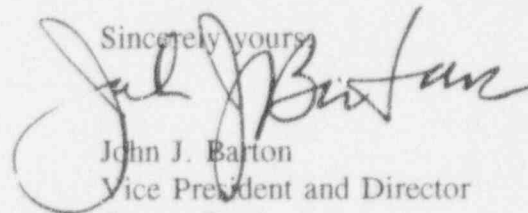
Enclosure 1 to NRC Inspection Report 50-219/94-18 contained a Notice of Violation. Attachment I to this letter contains the reply to that Notice of Violation, as required by 10 CFR 2.201.

We agree there was a lack of control of the maintenance activity as a result of not complying with our equipment control procedures. In addition, a more timely implementation of the turnover process would have brought the need for operating instructions in question.

The GPUN critique of this event did not indicate that the project controls used during this modification were a contributing factor to this event. It is noted, however, that a revised project management process is in the final stages of implementation which will provide greater continuity through the project life cycle.

If you should have any questions or require further information, please contact Mr. Terry Sensue, Oyster Creek Licensing Engineer at 609-971-4680.

Sincerely yours,



John J. Barton  
Vice President and Director  
Oyster Creek

JJB/TS/jc

cc: Administrator, Region 1  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Engineer

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## **Attachment I**

### **Violation:**

10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that activities affecting quality must be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and activities must be accomplished in accordance with these instructions, procedures, or drawings.

Contrary to the above, on August 9, 1994, documented instructions, procedures, or drawings did not adequately prescribe Containment Spray/Emergency Service Water System I maintenance. As a result, secondary containment integrity was unknowingly compromised.

### **GPUN Reply:**

GPUN concurs with the violation as written.

### **Reason for the Violation**

The cause of the violation was a failure to follow established procedures for the control of plant equipment configuration as a result of a misunderstanding by personnel of the need for documented instructions for the draining evolution.

A contributing cause to the violation is that Mechanical Maintenance personnel are unfamiliar with the implementation and turn-over of configuration changes. This unfamiliarity with the plant configuration change control process allowed a missed opportunity to identify the need for adequate operating instructions to be provided for the modification.

### **Corrective Actions Taken and the Results Achieved**

The maintenance activity was stopped. The isolation valve that allows draining of the containment spray/emergency service water heat exchangers contents to the overboard discharge line was closed. This re-established secondary containment integrity. Also, the hoses associated with the modification were disconnected.

A switching and tagging order was implemented to tag closed both System 1 and System 2 overboard discharge line drain isolation valves. This prevents the use of the modification without proper operating instructions.

## Attachment I

### Corrective Actions Taken and the Results Achieved - (Continued)

The Plant Configuration Change Control process was implemented for the modification performed to both systems. The process identified the lack of operating instructions for the modification as a discrepancy. Station operating procedure 310, Containment Spray System Operation, is being revised to include specific directions for using the modification.

### Corrective Steps Taken to Avoid Further Violations

Maintenance personnel will be given additional training on following established procedures for the control of plant equipment. This training will emphasize that installed plant equipment is not to be operated by Maintenance personnel without appropriate approved operating instructions. Also, Maintenance supervision will be given training on the Plant Configuration Change Control process. This training will increase personnel familiarity with the process and reinforce using a questioning attitude while performing maintenance activities.

The Control Room operating crew will be provided the critique of this event in the required reading program. This required reading will emphasize the importance of the turnover process and the need to have appropriate instructions to control these types of activities.

### Date When Full Compliance was Achieved

Full compliance was achieved on **August 10, 1994** when the maintenance activity was stopped and secondary containment integrity was established.