



GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number

C321-91-2156
June 12, 1991

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

References: 1. GPU Nuclear response to NRCB 88-10 dated April 3, 1989
2. NRC letter, Miraglia to Raisin dated February 17, 1989

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
NRC Bulletin 88-10
"Non Conforming Molded-Case Circuit Breakers"

This letter is being written to supplement the GPU Nuclear response to NRC Bulletin 88-10, "Non-conforming Molded-Case Circuit Breakers" for the Oyster Creek Nuclear Generating Station. In Reference 1 noted above, GPU Nuclear stated that a total scope of 72 circuit breakers were located in the Oyster Creek warehouse. 68 of these breakers were verified to be fully traceable to their respective original manufacturers and required no further action. The remaining four breakers were segregated for further evaluation.

In Reference 2, noted above, the Office of Nuclear Reactor Regulation provided clarifications on the original NRCB 88-10 requirements. Clarification 4 stated:

"...the staff will not require utilities to test stored non-traceable MCCBs but will require, in lieu of testing, all non-traceable breakers be considered failed within the context of the Bulletin.

By this letter, GPU Nuclear documents these four breakers to be administratively "failed within the context of the bulletin". Therefore, the failure rate for the circuit breakers within the scope of the bulletin is 4 out of 72, or 5.6%.

9106180369 910612
PDR ADOCK 05000219
G PDR

JE21 1/1

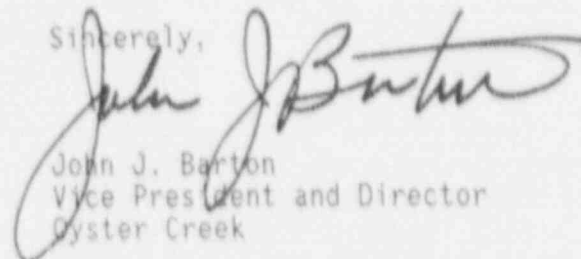
Although the original bulletin would require additional testing for the four administratively declared failures based on failure rate, the February 17, 1989 letter goes on to state:

"The staff will, on a case by case basis only, consider the circumstances of individual utilities with a very small number of non-traceable MCCBs. Provided all non-traceable MCCBs can be accounted for and the circumstances contributing to the non-traceable stock do not suggest repeatable programmatic breakdowns of utilities procurement practices, the staff may relieve utilities from AIs 4 and 5 and instead require only the removal from stock of the non-traceable MCCBs."

As: 1) All non-traceable circuit breakers have been identified; 2) the one time procurement of these breakers was through a subvendor resulting in the loss of traceability; and 3) the procurement practices have been revised to require procurement of safety related circuit breakers from original manufacturers; GPU Nuclear requests that relief from action items 4 and 5 of NRCB 88-10 be granted for these four breakers. Relief from these action items will complete the required actions for NRCB 88-10 at the Oyster Creek site.

If any further information is required, please contact Mr. John Rogers at (609)971-4893.

Sincerely,



John J. Barton
Vice President and Director
Oyster Creek

JJB/jc

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