



**GPU Nuclear Corporation**

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March 28, 1984

Mr. Richard W. Starostecki, Director  
Division of Project and Resident Programs  
U.S. Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Starostecki:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection Report 83-26

This letter is submitted in response to your letter of February 27, 1984, regarding the Notice of Violation (NOV) contained in Appendix A.

In accordance with 10 CFR 2.201, the attachment to this letter represents our reply to the NOV. If there are any questions regarding the information therein, please contact me or the Oyster Creek Licensing Manager at (609) 971-4643.

Very truly yours,

Peter B. Fiedler  
Vice President and Director  
Oyster Creek

PBF:RPJ:dam  
Attachment

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

NRC Resident Inspector  
Oyster Creek Nuclear Generating Station  
Forked River, NJ 08731

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ATTACHMENT

Violation:

As a result of the inspection conducted on November 7 - December 31, 1983, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C) the following violation was identified:

Technical Specification 6.8.1 requires that written procedures be established, implemented, and maintained that meet or exceed the requirements of Appendix A of Regulatory Guide 1.33-1972, Appendix A of Regulatory Guide 1.33-1972 specifies that specific procedures for each surveillance test listed in the Technical Specifications be written.

Contrary to the above, Surveillance Procedure 645.6.012, Fire Pump Functional Test, failed to incorporate a Technical Specification change relating to fire pump acceptance criteria. As a result, testing performed on September 14, 1982 failed to identify the development of an inadequate pump head pressure.

Reply:

We concur with the violation as stated.

The discrepancy was first identified by GPU Nuclear on November 3, 1983 and reported to the NRC via Special Report 83-01P on November 4, 1983. A follow-up report, Special Report 83-01T, was submitted on November 18, 1983.

The Apparent Cause of Occurrence section of Special Report 83-01T states: "... the acceptance criteria in surveillance procedure 645.6.012, 'Fire Pump Functional Test' was not properly revised to reflect the Technical Specification surveillance requirements which were issued via Amendment 58 on December 21, 1981." The Corrective Action section of the same Special Report states: "The acceptance criteria in procedure 645.6.012 has been revised to incorporate the requirements in Section 4.12.B of the Oyster Creek Technical Specifications." This was done with a Temporary Change and the permanent change was approved on December 23, 1983. The fire pump in question, pump 1-1, was returned to operable status on November 24, 1983 after a successful functional test. Another corrective action that was undertaken because of Special Report 83-01T was a complete review of all Surveillance procedures to ensure that the procedures reflect Technical Specification requirements. This item was the only item not incorporated into facility procedures from Technical Specifications Amendment 58.

GPU Nuclear now incorporates changes to the Technical Specifications into facility procedures by a more formalized process than used in December 1981. Technical Functions procedure LP-006 now controls the distribution of Technical Specification changes through the Licensing Action Item system. By this system, Licensing generates an Action Item (AI) to Plant Engineering to

see that all procedures affected by the Amendment are reviewed and changed as necessary. Within Plant Engineering there is a Plant Task Action tracking system by which the AI from Licensing is assigned to an engineer and tracked until completion. After completion, the engineer's task is reviewed by his supervisor and if deemed to be complete, the AI is returned to Licensing to be closed out.

Because this violation deals with what is considered an isolated incident and the methods now used by GPU Nuclear to control Technical Specification changes were instituted after December 1981, GPUN feels that the necessary corrective actions have been taken that will avoid further violations. The date of full compliance can be given as December 23, 1983, when the procedure in question, 645.6.012, was approved as revised.