



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

May 25, 1995
C321-95-2160

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Response to Inspection Report 50-219/95-02

Inspection Report 50-219/95-02 presents the results of a review of the Oyster Creek Maintenance Program. At the time of the inspection, the inspectors indicated this was a somewhat new approach to this type of activity. Therefore, GPUN provides the following comments for your consideration.

The inspection was beneficial in providing an initial assessment of activities underway to implement the maintenance rule as well as providing some insights to the existing maintenance practices. The inspection results coincide with our own assessments in the maintenance area. Many of the observations in the report are areas in which development work is in progress. The existing maintenance program, as well as the changes being implemented as a result of the maintenance rule have and will maintain plant systems and components in a safe configuration supporting safe operation of the facility. This is of primary importance to GPUN and all personnel involved in the operation of our nuclear facilities.

Your inspection report, including observations made by the inspectors, has been reviewed by station personnel and will receive the attention of management to ensure that our good performance continues to improve. The attachment presents the results of this review as well those actions being taken to address the identified concerns.

9506060406 950525
PDR ADDCK 05000219
Q PDR

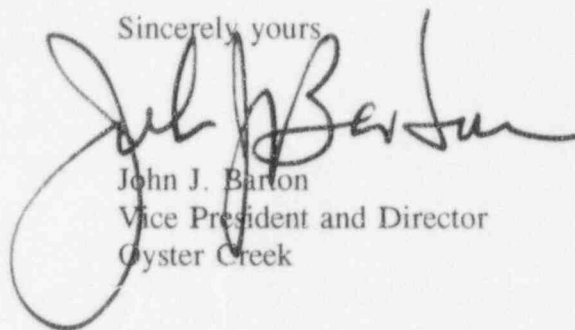
1-501
11

C321-95-2160

Page 2

If you should have any questions or require further information, please contact Mr. Joseph Andrescavage, Oyster Creek Licensing Engineer at 609-971-4862.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John J. Barton". The signature is fluid and cursive, with a large loop at the end.

John J. Barton
Vice President and Director
Oyster Creek

Attachment

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

ATTACHMENT I

Page 2, Section 3.1.1 Maintenance Scheduling

Paragraph 2 & 3

Finding:

The work prescribed with the new baseline schedule was based on previously-existing maintenance specifications; GPUN has yet to directly incorporate the insight gained from their individual plant examination into maintenance scheduling, nor have they developed a risk-based net safety gain analysis technique to provide guidance for scheduling on-line maintenance.

The inspector also noted, however, that experience is needed due to the lack of procedural guidance and control for the scheduling process at Oyster Creek. The only guidance used by GPUN for scheduling maintenance that could be provided to the inspector, was the work standard relating to LCO entry for maintenance. The inspector found the standard to be very conservative and effective, although entirely compliance-based. Oyster Creek was making progress toward becoming more performance-based in their scheduling of maintenance, as evidenced by the baseline scheduling concept initiated for operating Cycle 15. GPUN has yet to develop a practice for risk-based scheduling of on-line maintenance.

GPUN Reply:

The effort which will result in a comprehensive maintenance scheduling program which includes guidance for scheduling on-line maintenance activities is progressing satisfactorily. The guidance documents governing on-line maintenance activities are in the final stages of preparation and review.

A GPUN corporate policy is currently undergoing internal review and is expected to be finalized by the target program implementation date of June 1, 1995. A more detailed guidance document which will be published as an Oyster Creek Administrative Procedure is in final draft form and all significant comments have been resolved. This document provides a basis for scheduling on-line maintenance activities consistent with IPE considerations, and also provides a technique for screening and evaluating the risk significance for removing single and multiple systems and components from service for maintenance. The administrative procedure also addresses the issue of lack of procedural guidance in that scheduling process is clearly defined in terms of reviews, milestones and expectations.

In addition, work has been underway to change other OC administrative processes to support the requirements of this new process. This includes realigning the frequency and schedule for preventive maintenance tasks to align with scheduled systems out of service periods and other enhancements to GPUN's Work Management System (GMS-2).

Page 3 Section 3.1.2 Preventive Maintenance (PM) Program

Paragraph 4

Finding:

The inspector also identified, however, a number of areas where GPUN had not properly or completely followed the Component Maintenance Team (CMT) guideline. For example, in the review of the core spray system maintenance, the inspectors identified that equipment modifications effected during the last refueling outage in that system were not reflected in the system critical component list.

GPUN Reply:

Equipment modifications do not necessarily cause an update to the critical component list. The critical component list was developed to provide a priority of components to be trended and have their preventive maintenance reviewed in greater detail by the Component Maintenance Team (CMT). The way that preventive maintenance would be addressed for new components added to the plant would be through the modification process not the critical component list. This is in accordance with the CMT guideline.

Paragraph 4 continued.

Finding:

Also, the inspector found that the CMT staff could not locate certain evaluation files associated with equipment maintenance plans, nor had GPUN completed all PM comparisons, mostly for instrumentation and control equipment. In these cases where equipment maintenance plans or PM comparisons had not been completed, GPUN relied on Technical Specification requirements to satisfy the PM program.

GPUN Reply:

Not all the files documenting the evaluations of the components on the critical component list were available. We are actively pursuing completion of these efforts. The evaluations and PM comparisons for predominantly I&C components are not completed. Existing surveillance testing in lieu of a rigorous PM program is felt to be technically justifiable for most of the I&C equipment. Trending of surveillance results (deviations from acceptable performance) will provide additional information to determine the appropriate level of maintenance. This review has already been completed and is currently being documented. It is intended to complete this effort in compliance with the CMT guidelines by June 30, 1995.

Page 5 Section 3.2.2 Performance Findings

Paragraph 1

Findings:

During a review of ongoing troubleshooting activities, the inspector determined that control of one of these activities was weak. The inspector identified that the specified troubleshooting risk assessment had not been properly completed by engineering, yet the work had been approved by operators. Additionally, the inspector identified that this troubleshooting plan was not in the control room, and that the troubleshooting activities had not been performed for several days.

GPUN Reply:

Once aware of this concern, Operations management promptly instructed the system engineer to return the troubleshooting plan to the control room. Although the plan had been completed and no additional activities were to be performed while the plant was on line, the plan was returned to the control room in an expeditious manner. In order to prevent a similar type of incident recurring, the procedure, which controls troubleshooting activities, was revised to require that a copy of the troubleshooting plan remain in the control room at all times.

With respect to the risk assessment that was performed to support this troubleshooting plan, operations management concluded that the assessment, although somewhat weak in its level of detail, was adequate to support the evolutions that were being performed under the control of this plan. Essentially, the activities that were being performed were within the scope of the existing operating procedures and did not constitute a deviation from those activities which had been previously reviewed and approved.

Paragraph 3

Finding:

During a review of an ongoing work activity, the inspector determined that GPUN displayed poor attention to detail. The work activity specified, in part, that certain manual valves of the core spray system be repositioned. The inspector determined that the written work instructions did not clearly state that two of these valves be returned to the appropriate position.

GPUN Reply:

Once aware of this concern, operations management suspended any further troubleshooting activities and immediately dispatched an operator to verify the positions of the valves in question. Although the valve positions were not specifically included in the troubleshooting plan, the valves were aligned in the proper position and the system was in an operable condition. Operations management had the troubleshooting plan revised to include a specific requirement for checking the position of all valves which were manipulated.

In addition to the change to this troubleshooting plan, operations management revised the troubleshooting procedure in order to require that any valves or components which are manipulated during the course of the troubleshooting activity be verified in the proper position following completion of the troubleshooting activities. Several other administrative changes were made to this procedure as a result of comments and feedback received from the NRC inspector.

Page 6 Material Condition and Housekeeping

Finding :

Aside from minor weaknesses noted in service water pump labeling and in previously-addressed deficiency tags still hanging in the plant, the inspector concluded that the improved appearance and condition of the Oyster Creek plant was a positive indicator of an effective maintenance program.

GPUN Reply:

Operations Management was aware of the various labeling deficiencies which exist throughout the plant and has established a task force to eliminate these deficiencies and reduce the outstanding labeling backlog. Additionally, operations management is evaluating enhancements to our existing labeling program in order to ensure that the numerous components/equipment labels are properly maintained at all times.

With respect to the concern associated with the usage of deficiency tags in the plant, operations and maintenance management are evaluating our current program for potential enhancements in order to address the concerns which have been identified in this report along with those which have been internally identified.

Page 7 Section 3.3.1 Maintenance Organization and Self Assessment

Paragraph 2

Finding:

The inspector identified one finding in that GPUN procedures specified that the failure trend analysis report be prepared and issued on a quarterly basis, yet the maintenance assessment group had begun to issue the report on an annual basis without a corresponding change to the procedure.

GPUN Reply:

Our change from a full failure trend report issued quarterly to annual was a conscious decision with the understanding that an analysis of component failures was conducted on a quarterly basis and necessary corrective actions initiated based on those reviews meeting the intent of our failure trending program. We believed that a change to the procedure was not required, although subsequent to this inspection, changes have been made to the procedure to clarify our failure trending reporting requirements.

Page 8 Section 3.3.3 Quality Assurance review of Maintenance

Paragraph 2

Finding:

The inspector identified one discrepancy from a 1994 audit in which an NSA- identified violation of technical specification overtime requirements was not processed in accordance with GPUN procedures. The overtime violation had been properly identified in the audit, but the prescribed follow-up actions had not been properly completed.

GPUN Reply:

We have reviewed the NSA audit referenced by the inspector. Our review concluded that the prescribed follow up actions were appropriate and properly completed in a timely manner.