GPU Nuclear

GPU Nuclear Corporation
One Upper Pond Road
Parsippany, New Jersey 07054
201-316-7000
TELEX 136-482
Writer's Direct Dial Number:

January 3, 1992
C321-91-2324

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

Gentlemen:

Subject: Oystrr Creek Nuclear Generating Station
Docket No. 50-219
Response to NRC Inspection Report No. 50-219/91-23

Your letter dated September 26, 1991 transmitted NRC Inspection Report No. 50-219/91-23. The inspection was conducted on July 8-12, 1991 by your staff, Mr. L. Cheung and his consultant, to review GPU Nuclear's implementation pertaining to post-accident monitoring instrumentation.

The inspection report identified one deviation and one unresolved item, and requested GPU Nuclear's response within 30-days of the receipt date of the report. We contacted Mr. L. Cheung in early November and requested an extension for our response by approximately one month. Corrective steps taken and/or to be taken to ensure compliance with Regulatory Guide (R. G.) 1.97, Rev. 3 requirements on the deviation and unresolved item are provided below.

NOTICE OF DEVIATION

- NRC FINDING

  Contrary to the provisions of R. G. 1.97, Rev. 3, no calibration program was specified for the instruments for the status of standby power, and the instruments had not been calibrated since 1986. (Appendix A to the NRC letter of September 26, 1991).

- GPU NUCLEAR RESPONSE

  The instruments for the status of standby power identified in Notice of Deviation include ammeters and voltmeters for 125-VDC batteries B and C, and kilowatt meters for Diesel Generators 1 and 2. All meters are located on Control Room panel 8F/9F. The kilowatt meters were calibrated in June 1991 prior to the NRC inspection. The ammeters and voltmeters were calibrated immediately following the NRC inspection in July 1991. Therefore, corrective steps have been taken by calibrating the instruments for the status of standby power.

IE01
1/0

To further ensure full compliance with R. G. 1.97, Rev. 3 with respect to calibration/testing, the existence of calibration/test programs will be confirmed or new programs will be established if needed for those instruments currently installed and considered as R.G. 1.97 parameters. It is projected that this effort will be completed by June 30, 1992.

UNRESOLVED ITEM

- NRC FINDING

  The inspectors found several examples where the instrument range in the control room did not match the range identified in the licensee's Regulatory Guide 1.97 submittals or in th Final Safety Analysis Report (FSAR). (Item 3.10, Inspection Report 50-219/91-23).

- GPU NUCLEAR RESPONSE

  Existing Regulatory Guide 1.97 instrument discrepancies have been verified via walkdowns. Any discrepancy between the installed instruments, FSAR description and previous GPU Nuclear submittals will be corrected and submitted with the annual FSAR update.

TAG NUMBERS AND INSTRUMENT IDENTIFICATION

- NRC FINDING

  During the physical inspection in the control room, the inspectors noted that many instruments, besides some of those audited for inspection, did not have instrument tag numbers on the control panel or the instrument face. The licensee agreed to include equipment identification numbers on or adjacent to the instrument face as part of their human factors upgrade. In addition, there was no unique identification for the subset group of instruments for Regulatory Guide 1.97 (Item 4.2, Inspection Report 50-219/91-23).

- GPU NUCLEAR RESPONSE

  As it was discussed with your staff during the exit interview, GPU Nuclear will provide appropriate tag numbers or labels for those R. G. 1.97 instruments on the control room panels by the end of the current operating cycle which is now projected to be January 14, 1993. In addition, unique identification for the subset group of instruments for Regulatory Guide 1.97 will also be provided by the end of the current operating cycle per the commitment included in our May 1, 1991 letter to the NRC.

In addition, we have noticed the following discrepancies in Inspection Report No. 50-219/91-23.

- Item 3.2, Reactor pressure vessel water level, describes that "...the fuel zone range instrument is not powered by Class 1E Power Sources..." This is not entirely correct. Power sources for the fuel zone level instrumentation are 120-VAC Reactor Protection Panels 1 and 2 for microprocessors and recorder, and 120-VAC panels VACP-1 and CIP-3 for transmitters. All these power panels are Class 1E. However, the power supply for the transmitter loops lacks separation. The proposed Reg. Guide 1.97 modification, as described in our letter dated May 1, 1991, will provide two new instrument power supply units for the transmitter loops. In addition, the concern regarding the loss of reactor protection system panel power during loss-of-offsite power event will be resolved by providing two redundant Class 1E power sources backed by diesel generators.

- Item 3.3, Reactor Pressure Vessel Pressure, describes that "...the Licensee agreed to provide recording capabilities for this variable during the next refueling outage (14R)..." The recording capabilities will be installed according to our Integrated Schedule.

If you have any questions concerning the above, please contact Mr. Michael Laggart, Manager, Corporate Nuclear Licensing at (201) 316-7968.

Sincerely,

J. J. Barton,
Vice President and Director
Oyster Creek

JBB/YN/plp

cc: Administrator, Region 1
NRC Resident Inspector
Oyster Creek NRC Project Manager
J. P. Durr - NRC