



GPU Nuclear Corporation

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Writer's Direct Dial Number:

October 3, 1984

Mr. Walter A. Paulson, Acting Chief
Operating Reactors Branch #5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Paulson:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
NUREG-0737, Item II.K.3.16

Ref (1): NEDO-24951, Chapter 6 - Reduction of Challenges and
Failures of Relief Valves Per NUREG 0737 Requirement
II.K.3.16

(2): NRC letter dated April 11, 1984 with Safety Evaluation
Report "BWR Owner's Group Response to Item II.K.3.16 of
NUREG 0737, 'Reduction of Challenges and Failures of
Relief Valves-Feasibility Study and System Modification

The purpose of this letter is to respond to your letter (reference 2
above) dated April 11, 1984. This letter described methods acceptable to the
NRC in order to reduce SRV challenges and failures. Listed below are the
acceptable modifications and our response:

(1) Low-Low Set Relief Logic System or Equivalent Manual Actions;

RESPONSE - For a BWR/2 with Dresser valves, this modification has no
effect on SORV Event Frequency or S/RV Challenges per tables 5.1 and 5.2 of
Reference (1). GPUN has not implemented this and has no plans to implement
this in the future.

(2) Lower the reactor pressure vessel water level isolation setpoint for
main steam isolation valve closure from Level 2 to Level 1;

RESPONSE - This modification is not applicable to Oyster Creek per
Reference (2) - "This system modification is not applicable to BWR/2-3 because
the level instrumentation design for these plants is incompatible with the
design described herein".

(3) Increase safety/relief valve simmer margin;

RESPONSE - This modification is not applicable to Oyster Creek as it
applies to Target Rock three stage valves.

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(4) Preventative Maintenance Program;

RESPONSE - This is applicable to Oyster Creek. GPUN is implementing a preventative maintenance program for the Dresser electromatic relief valve which requires that all 5 valves be tested and refurbished each outage. All 5 valves were tested and refurbished during our current outage.

In addition to the above, it was requested that we respond to the following questions:

(1) Which, if any of the staff recommended modifications have been implemented?

RESPONSE - Recommendation (4), Preventative Maintenance Program, has been implemented at Oyster Creek.

(2) Which, if any, of the staff recommended modifications do you propose to implement?

RESPONSE - GPUN does not propose to implement any of the staff recommended modifications other than preventative maintenance.

(3) Whether you have implemented or propose to implement any of the other modifications or actions discussed in NUREG-0737, Item II.K.3.16 or in the BWR Owners Group report.

RESPONSE - In response to these questions, we note that Tables 5.1 and 5.2 of Reference (2) show no significant effect on SORV Event Frequency or S/RV Challenges for a BWR/2 with Dresser valves for the candidate modifications. Therefore, GPUN has no plans to implement any other modifications.

Should you require any further information on this subject, please contact Mr. Michael Laggart, BWR Licensing Manager at (201) 299-2341.

Very truly yours,



Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF/dam

cc: Dr. Thomas E. Murley, Administrator
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