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October 23, 1995

Dr. John Moulton
U.S. Nuclear Regulatory Commission
One White Flint North Mailstop 11D-23
11555 Rockville Pike
Rockville, MD 20832

Dear Dr. Moulton:

Subject: Oyster Creek Nuclear Generating Station
Docket 50-219
Sea Turtle Trash Bar Inspections

The Incidental Take Statement of the draft Oyster Creek Nuclear Generating Station (OCNGS) Biological Opinion includes terms and conditions which address the requirements for acceptable performance of inspections for the intake trash bars during the June 1 - October 31 sea turtle season at OCNGS. GPU Nuclear (GPUN) has initiated an inspection program for the Circulating Water System (CWS) and the Dilution Water System (DWS) which we believe adequately addresses these requirements.

In order to ensure that inspections of the CWS and DWS intake trash bars are not "clumped", Plant Operations personnel complete tours of both the intake areas twice during each 8-hour shift (i.e., six times daily at relatively constant intervals). Operations personnel perform these inspections in accordance with the "Operations Work Performance Standards on Logkeeping", which require that the first inspection of each shift begin within the first two hours of the 8-hour shift.

The second inspection per shift is conducted during the second half of the shift, typically during the fifth or sixth hour of the shift. Completion of both inspections per shift is documented on inspection logs. Occasionally, because of the work load during the shift, the second inspection time may vary, but consecutive inspections will not be clumped in order to meet the Incidental Take Statement conditions.

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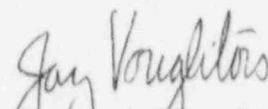
These procedures not only effectively limit the elapsed time that a sea turtle could remain impinged at or near the surface at either the CWS or DWS intake before being retrieved by plant personnel, but also ensure that consecutive trash bar inspections are not clumped. Therefore, GPUN feels that the proposed requirement to record the time of each inspection of the CWS and DWS trash bars is unnecessary.

As you know, sea turtle incidental captures are relatively unusual occurrences at OCNGS. Therefore, no sea turtles are sighted during well over 99 percent of the CWS and DWS inspections. However, in the event that an incidental take of a dead sea turtle were to occur, the maximum possible time that the turtle may have been impinged can be determined with reasonable accuracy from inspection records currently being maintained.

For the reasons specified above, GPUN feels that its current program for sea turtle inspections of the CWS and DWS intake trash bars achieves the goals implicit in Term/Condition 10 of the Incidental Take Statement. We therefore request that the proposed requirement to record the time of each inspection of the CWS and DWS trash bars be deleted from the final Biological Opinion Incidental Take Statement.

If you have any questions or require any further information, please do not hesitate to contact me at (609) 971-4021 or Malcolm Browne at (609) 971-4124.

Very truly yours,



James J. Voughlitois
Manager, Environmental Affairs

cc: J. Barton
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