



**GPU Nuclear Corporation**  
Post Office Box 388  
Route 9 South  
Forked River, New Jersey 08731-0388  
609 971-4000  
Writer's Direct Dial Number:  
**6530-952-722**

November 8, 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 Inspection Documentation

My letter to you dated October 23, 1995 described the reasons why GPU Nuclear (GPUN) feels that our existing procedures ensure that the twice per 8-hour shift intake trash bar inspections will be regularly spaced, rather than clumped, thereby meeting the intent of Condition #1 of the Incidental Take Statement issued by the National Marine Fisheries Service (NMFS). In short, existing Oyster Creek Station procedures require that the first inspection of each shift begin within the first two hours of the 8-hour shift and the second inspection be conducted during the second half of the shift, typically during the fifth or sixth hour of the shift. This procedure effectively ensures that intake structure inspections will not be clumped together. As such, we requested that the proposed requirement to record the time of each inspection of the trash bars be deleted from the final Biological Opinion Incidental Take Statement. In your recent telephone conversation with Malcolm Browne of our Environmental Affairs Department, you indicated that you feel that it is still necessary to record the time of the inspections.

Our concern with recording the time of each inspection relates to the fact that the personnel who perform these inspections are responsible for verifying the operability of dozens of different types of plant equipment as well as reading various gauges and instruments during their tours. Depending upon the conditions the operator encounters on a given tour, the timing of the trash rack inspections will vary from tour to tour.

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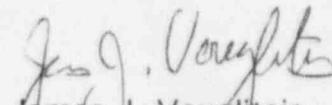
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As long as it is understood that the timing of the inspections as described above represents customary practice, but that the precise timing of the inspections will vary depending upon conditions encountered during the tour, then GPUN can comply with the requirement to record the times of the inspections. We simply want to avoid a situation where the NRC or the NMFS expect the trash rack inspections to be precisely spaced, because that is not achievable.

Please call me at (609) 971-4021 so that we can resolve this matter. Thank you for your cooperation.

Very truly yours,



James J. Vouglitois  
Manager, Environmental Affairs  
Oyster Creek Nuclear Generating Station

JJV/mmj

cc: J. Barton  
B. Good  
M. Browne  
K. Mulligan  
T. Corcoran  
G. Busch