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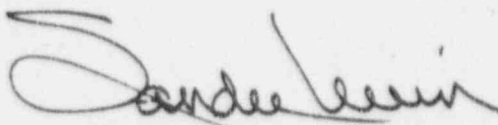
December 4, 1995
C321-95-2356

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 50-219/95-16
Reply to a Notice of Violation

On November 2, 1995, the USNRC docketed Inspection Report 50-219/95-16. Enclosure 1 to that report contained a Notice of Violation. The attachment to this letter provides the requisite reply. If any additional information or assistance is needed, please contact Mr. John Rogers of my staff at 609.971.4893.


for John J. Barton
Vice President and Director
Oyster Creek

JJB/JJR
Attachment

cc: Oyster Creek NRC Project Manager
Administrator, Region I
Senior Resident Inspector

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Attachment 1
Reply to a Notice of Violation
Inspection Report 50-219/95-16

Violation

The code of Federal Regulations, 10 CFR 50, Appendix B, Criterion XVI, requires that measures shall be established to assure that conditions adverse to quality, such as failure, malfunctions,... are promptly identified and corrected.

Contrary to the above, as of August 1995, measures, although established, were not effective or prompt in the identification and correction of conditions adverse to quality, in that recurrent, multiple failures (at least 326) of the 107 onsite emergency lighting units (some required by Appendix R) persisted since 1989 and were not promptly identified as a generic problem, and effective corrective action was not taken.

GPU Nuclear Response

GPU Nuclear concurs in the violation as corrected below.

The cover letter for Inspection Report 95-16 states in part:

"Many of the monthly emergency lighting batteries were replaced on a monthly basis due to repeated test failures for several years, reducing the assurance that the lighting units would properly function if needed during a 10 CFR 50, Appendix R, fire."

This statement is not accurate. First, there is no ELU which had its battery replaced on a monthly basis. During each monthly surveillance, a few batteries were replaced (averaging approximately 3 % of the total number), but this is the mark of a successful surveillance program, not an inadequate maintenance program. Second, only a very small portion of the maintenance activities involved an ELU which failed to light. The vast majority of the maintenance activities did not involve an ELU failure (e.g. low electrolyte level, burned out indicator light bulb on the charger unit), and there is no indication that they would have failed to illuminate for the specified eight hours. Third, because the 107 ELUs have two batteries each, the total sample volume is not 107, it is 214. Last, The 326 "failures" occurred over a six year period.

GPU Nuclear acknowledges that 326 replacements for the 214 batteries installed in the ELUs were made due to degradation. The vast majority of the batteries were replaced due to low electrolyte levels which diminishes the battery capacity, it does not render it inoperable. Also, it is important to note that many additional deficiencies have been identified and corrected (e.g. battery charger indicator bulb problems, internal wiring corrosion). The maintenance program for all of the 107 ELUs has been extensive.

The root cause of the ineffective repair of the ELUs installed at the Oyster Creek plant was an insensitivity to the importance of the Appendix R ELUs. The ELUs at Oyster Creek were tested using a surveillance procedure. The procedure did not differentiate between ELUs installed for Appendix R and ELUs installed for other reasons. The use of a surveillance procedure does not allow for immediate repairs to identified degraded units. Degraded units were identified on a maintenance work request and then scheduled for completion. The combining of Appendix R and non-Appendix R ELUs led to a lack of sensitivity to the importance of the Appendix R units. However, it must be noted that none of these ELUs are Nuclear Safety related, and none of the ELUs or their components were procured pursuant to 10 CFR 21.

GPU Nuclear does acknowledge that there was not an adequate level of attention to the generic implications of the battery replacements. The batteries had previously been considered a consumable. Although several evaluations had been performed on the ELUs, it had previously been determined that the battery degradation was due to normal component aging.

In August 1995, an assessment of the ELU batteries was formalized and forwarded to engineering for evaluation. This assessment prompted a new review of the ELUs and the subsequent identification of a more generic concern. In September 1995, an engineering evaluation identified five Appendix R ELUs which had been degraded but not repaired for an extended period of time. This was reported in LER 95-006. The extended period of time had also been caused by the surveillance procedure's lack of sensitivity to the importance of Appendix R ELUs. The maintenance and engineering departments are presently evaluating the need for frequent replacement and considering several alternatives. Additionally, the Nuclear Safety Assessment Department has initiated a quality review of the Appendix R program which will revisit the implementation of the Appendix R program not just in equipment reliability, but in total implementation.

Corrective Actions Taken and Results Achieved

To preclude the recurrence of an ELU being inoperable for an extended period of time, the surveillance procedure was replaced by a Preventative Maintenance (PM) Task. The PM task allows for the immediate repair of an ELU. This will reduce the administrative delay which was encountered by the previous surveillance procedure. It also requires the issuance of a Deviation Report for all ELUs which fail to illuminate. This will ensure proper management oversight and attention. Finally, it now requires an immediate notification to the Operations department when a failure is identified.

ELUs have been given increased attention by several departments at Oyster Creek. The vendor of the existing ELUs has been contacted and the results of his recent improvements to the design of the batteries is being monitored. The desirability of continuing with the existing ELUs or changing to a new vendor is being evaluated.

Corrective Actions Which Will Be Taken

The PM task is being further revised to specify the ELUs which are required for Appendix R. Additionally, an overall programmatic review of the implementation of Appendix R requirements has been initiated to ensure compliance was maintained.

Date When Full Compliance was Achieved

Full compliance was achieved in September 1995 with the implementation of the new PM task resulting in increased attention and visibility to the generic aspects of the ELU concerns.