



**GPU Nuclear Corporation**

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Writer's Direct Dial Number:

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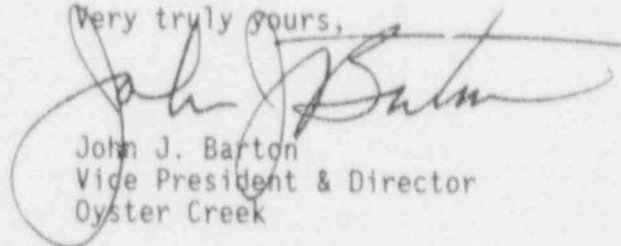
U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Dear Sir:

In accordance with 10 CFR 2.201, the enclosed provides GPU Nuclear's response to the Notice of Violation identified in NRC's Inspection Report 50-219/92-04.

If you should have any questions or require further information, please contact Brenda DeMerchant, OC Licensing Engineer at (609) 971-4642.

Very truly yours,



John J. Barton  
Vice President & Director  
Oyster Creek

JJB/BDEM:jc

Enclosure

cc: Administrator, Region 1  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Manager

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### Violation

Section 50.47(b)(8) of 10 CFR Part 50, requires the licensee to have adequate emergency response facilities and equipment to support the emergency response provided and maintained. A June 12, 1984, Confirmatory Order requires the licensee to comply with the commitments as stated in the April 15 and July 19, 1983, and the March 9, and April 9, 1984 correspondence in response to commitments on emergency response capability schedules. The habitability of the Technical Support Center (TSC) was described as meeting the requirements of Standard Review Plan (SRP) 6.4, "Control Room Habitability System" as they pertain to Control Rooms, with the exception of automatic actuation, seismic and redundancy criteria. SRP 6.4, Section 6.4-II.3, specifies that the ventilation shall be tested on an 18 month frequency. Specifically, the TSC ventilation system was to be tested to verify that system makeup was  $\pm 10\%$  of the design value, and that the TSC can be pressurized to at least 1/8 inch water gage while making up at the designed rate.

Contrary to the above requirements to maintain and test the TSC ventilation system, adequate maintenance and testing was not conducted since completion of construction of the TSC in 1985 until December 1991. This was evident by the degraded condition of the TSC ventilation system discovered during testing in November and December, 1991.

This is a Severity Level IV violation (Supplement VIII).

### Response:

GPUN concurs with the violation as stated.

#### 1) Reason for the Violation:

As discussed during the enforcement conference on April 30, 1992, although we were aware that a Confirmatory Order had been issued, we believe the root cause of this violation was that specific requirements as to the maintenance, testing, and surveillance of the TSC ventilation system were not clearly defined in the project documentation.

Response:

Cont'd

The following contributing factors also led to the violation :

- The incomplete work list overdue commitment dates did not receive appropriate attention, even though they are reviewed periodically.
- The Site Emergency Building (SEB) was a major project with low visibility relative to plant activities since it had a minimal interface with plant systems.
- The TSC ventilation system was overshadowed by the large amount of SEB construction deficiencies unrelated to the TSC.
- An SDD Division 2, which provides information for operations and maintenance of the system, was not developed for this project.

2) The following corrective actions were immediately initiated upon discovery of the degraded condition of the TSC ventilation system :

- A review of TSC operability determined that the facility would remain operable assuming the degraded ventilation system performance.
- An automatic, alarming Iodine sampler was placed in the TSC. The device would alarm at a preset Iodine concentration.
- Respirator qualifications were checked and were current for all required TSC duty roster positions. (Position numbers 200-249).
- Respirator qualifications were checked for all supplemental TSC positions, (Position Numbers 250-299) and although respirator qualifications are not required for these positions, personnel are encouraged to maintain qualifications.
- The onsite supply of respirators and charcoal impregnated filters were reviewed and found to be adequate to support emergency operations.
- Other Confirmatory Orders regarding NUREG 0737 were reviewed to assure similar compliance issues did not exist at the station.
- All outstanding Incomplete Work List (IWL's) items were reviewed to assure similar items did not exist.
- An outside contractor was retained to perform the required testing.

3) Corrective steps to be taken to avoid further violations :

Since the TSC was designed and constructed in the early 1980's improvements to the design review process have evolved. These include:

- The preparation of in-depth System Design Description documents (divisions 1 & 2 ) which define in detail the design criteria and maintenance/surveillance requirements are now required.
- The requirement for project review meetings, in the form of preliminary engineering design review (PEDR), and operability, maintainability, constructability review (OMCR), reinforces the establishment and understanding of maintenance and surveillance requirements.

These improved processes have been in effect since approximately 1986.

- In addition to the above, a formal "turnover" meeting for the Technical Support Center portion of the Site Emergency Building will be scheduled during the third quarter of 1992. This meeting will establish the "ownership" of the TSC and which department is responsible for each aspect of the facility operation and maintenance.

4) Date of full compliance:

- Full compliance was achieved on March 31, 1992, when Nuclear Consulting Services successfully performed the required testing on the TSC ventilation system.