GPU Nuclear

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Writer's Direct Dial Number:

June 18, 1992
C321-92-2193

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 50-219/92-07.

If you should have any questions or require further information, please contact Mr. Thomas Blount at (609) 971-4007.

Very truly yours,

John J. Barton
Vice President & Director
Oyster Creek

JJB/TB:cg
Attachment
cc: Administrator, Region I
Senior NRC Resident Inspector
Oyster Creek NRC Project Manager

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IE01
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Attachment

RESPONSE TO NOTICE OF VIOLATION

Inspection Report 92-07

Violation:

Code of Federal Regulations Part 50, Appendix B, Criterion XVI, Corrective Action, requires that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies, defective material and equipment, are promptly identified and corrected. Procedure No. 118, "Preventive Maintenance Administrative Procedure" requires that technical information such as vendor and industry information be reviewed and distributed to various operating departments for action. Sections III and IV of Procedure No. 118 require that the Plant Engineering Director "Research and record technical information for the proposed PM task; [and] provide technical information to accommodate the maintenance initiation date of the PM task," and the Plant Operations Director "Review PM technical requirements [and]...schedule PMs for field execution."

Contrary to the above, neither the Plant Engineering Director or the Plant Operations Director performed appropriate engineering reviews or established appropriate preventive maintenance procedures to evaluate the physical condition or cycle time of the 4160 volt electric breaker "prop springs" as discussed in General Electric Service Advisory Letter (SAL) No. 348.1. Although this SAL had been reviewed by a staff engineer, a decision had been made to delay corrective action for two years. No plant management review of this decision was made nor was any action to inspect 4160 volt breakers for spring wear or to revise their preventive maintenance procedures to correct the problems described in GE SAL 348.1. As a result of this inaction, on April 5, 1992, a General Electric 4160 volt breaker "prop spring" failed, causing the breaker to open. The failure of this breaker caused the No. 1 diesel generator to be declared inoperable.

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

RESPONSE:

GPUN concurs with the violation cited above with the following clarifications to the Notice of Violation;

The present 118 procedure does not require technical information such as vendor and industry information be reviewed and distributed to various operating departments for action.

Section III of procedure 118 states that the Plant Operations Director "review PM technical requirements and schedule PMs for field execution". This statement applies to the Operations generated PMs for which Operations controls rotation of plant equipment, etc.

Section IV of procedure 118 states that the Plant Engineering Director is responsible to "Research and record technical information for the proposed PM task; provide technical information to accommodate the maintenance initiation date of the PM task". This statement applies to the preparation of preventive maintenance requests to the Maintenance Department.

Although the excerpts are accurate statements from procedure 118, it is our position that these statements are expressed out of context with respect to this violation.

Other clarifications/corrections related to this inspection report which have a bearing on the stated violation deal with Section 2.2.1 "Diesel Generator Breaker Failure" . Please note that the failure that the NOV refers to occurred on Diesel Generator #2, not on Diesel Generator #1. Also, the Diesel Generator #2 breaker having the failed prop spring had approximately 2900 cycles on its counter, not 1756 cycles as referred to in your inspection report. (Please note that 1756 is the number of cycles that existed on the #1 Diesel Generator Breaker at the time of the inspection).

With these clarifications our specific response to the NOV is as follows:

The Reason For The Violation

The Plant Engineering department at Oyster Creek reviewed USNRC Information Notice 90-41 shortly after it was issued on June 12, 1990. Based on this review, the Electrical Engineering Supervisor at the time made an engineering judgement that sufficient time was available to address the prop spring problem cited in the notice.

The technical basis for this conclusion was not documented, and a parallel action item assignment was not initiated to the Maintenance department to ensure followup action. Based on a discussion between Plant Engineering and Maintenance concerning breaker overhaul, the due date for the action item assigned to Plant Engineering was extended indefinitely and remained part of the Engineering work backlog.

This violation was caused by a lack of a critical review of the basis for deferring preventive actions. This was compounded by an inadequate periodic review of open engineering backlog action items.

The Corrective Steps That Have Been Taken And Results Achieved

With respect to the physical failure which occurred (failure of the EDG-2 4160 volt breaker) an action plan is under way to rebuild, in the General Electric shops, all Oyster Creek 4160 volt Magnablast circuit breakers with the specific goal of having no breaker prop springs(of the old type) with more than 1000 cycles. All safety related breakers are scheduled to be modified with the "new" spring and overhauled by the end of the third quarter 1992.

A critical review of the open backlog action items has been performed in the Electrical Engineering work inventory to ensure that there are no other critical issues that are not being appropriately tracked. At this time no other issues have been identified. Further, actions are being taken to reduce the electrical engineering task backlog including placing greater emphasis on assessing and closing tasks, evaluating the need for system modifications, and augmentation of the electrical engineering staff.

The Corrective Steps That Will Be Taken To Avoid Further Violations:

We believe that the problem which occurred in the case of the 4160 volt Magnablast circuit breaker at Oyster Creek is an aberration to an otherwise adequate action item tracking system. Revisions to action item requirements and due dates procedurely require the concurrence of the assigned manager (this is at least one level of management higher than the person performing the work). Also, Plant Engineering management will be performing a periodic review of open backlog tasks to provide continued assurance that critical issues are not being unacceptably deferred.

The Date When Full Compliance Was Achieved:

Based on the actions taken to date we believe the corrective steps to avoid further violations are in place and full compliance was achieved on May 15, 1992.