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September 14, 1992
321-92-2243

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Operating License No. DPR-16
Docket No. 50-219
Response to Supplement 1 to Generic Letter 87-02
SQUG Resolution of USI A-46

On February 19, 1987, the NRC issued Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46". This Generic Letter encouraged utilities to participate in a generic program to resolve the seismic verification issues associated with USI A-46. As a result, the Seismic Qualification Utility Group ("SQUG") developed the "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment". On May 22, 1992, the NRC Staff issued Generic Letter 87-02, Supplement 1, which constituted the NRC Staff's review of the GIP and which included Supplemental Safety Evaluation Report Number 2 ("SSER-2") on the GIP, Revision 2, corrected on February 14, 1992. The letter to SQUG enclosing SSER-2 requests that SQUG member utilities provide to the NRC, within 120 days, the following information. By letter dated August 21, 1992, to James G. Partlow, NRR-NRC, SQUG clarified that the 120 days would expire on September 21, 1992. This letter responds to the Staff's request.

NRC REQUEST:

A statement whether you commit to use both the SQUG commitments and the implementation guidance provided in GIP-2 as supplemented by the SSER No. 2 for the resolution of USI A-46. In this case, any deviation from GIP-2, as supplemented by the SSER No. 2, must be identified, justified, and documented. If you do not make such a commitment, you must provide your alternative for responding to GL 87-02.

GPU NUCLEAR RESPONSE:

As a member of SQUG, GPU Nuclear commits to use the SQUG methodology as documented in the GIP, where "GIP" refers to GIP Revision 2, corrected on

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GPU Nuclear Corporation is a subsidiary of General Public Utilities Corporation

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February 14, 1992, to resolve USI A-46 at OCNGS. The GIP, as evaluated by the Staff, permits licensees to deviate from the SQUG commitments embodied in the Commitment sections, provided the Staff is notified of substantial deviations prior to implementation. GPU Nuclear recognizes that the Staff's position in SSER 2 "is that if licensees use other methods that deviate from the criteria and procedures as described in SQUG commitments and in the implementation guidance of the GIP, Rev. 2, without prior NRC staff approval, the method may not be acceptable to the staff and, therefore, may result in a deviation from the provisions of" Generic Letter 87-02.

Specifically, GPU Nuclear hereby commits to the SQUG commitments set forth in the GIP including the clarifications, interpretations, and exceptions identified in SSER-2 as clarified by the August 21, 1992, SQUG letter responding to SSER-2 with the following clarification.

Section 3.1.1 "Identification of Safe Shutdown Path"

For the purpose of USI A-46 resolution "safe shutdown" is defined as bringing a plant to, and maintaining it in, a hot shutdown condition during the first 72 hours following an SSE as discussed in Section 3.2.3 of GIP. Since neither Oyster Creek Technical Specifications nor FSAR explicitly defines hot shutdown, the definition is provided below:

"Hot shutdown is the plant state in which the reactor is shut down, core cooling is maintained, and the fission product decay heat and stored energy are being adequately removed from the reactor pressure vessel to the ultimate heat sink."

Our safe shutdown equipment list includes equipment necessary to reach the hot shutdown condition described above within 72 hours following an SSE.

SSER, NO. 2, SECTION II.4.4 NO. 9

The SSER No. 2 states that the rigid baseplate assumption should be verified prior to using the ANCHOR Code. We have contacted the program's author, Stevenson & Associates, and they assert that the ANCHOR code is not formulated using a rigid baseplate assumption. We were informed by Stevenson & Associates that EPRI/SQUG is transmitting this information generically.

With respect to the GIP implementation guidance, GPU Nuclear generally will be guided by the remaining (non-commitment) sections of the GIP, i.e., GIP implementation guidance, which comprises suggested methods for implementing the applicable commitments. GPU Nuclear will notify the NRC as soon as practicable, but no later than the final USI A-46 summary report, of significant or programmatic deviations from the guidance portions of the GIP, if any. Justifications for such deviations, as well as for other minor deviations, will be retained on site for NRC review.

NRC REQUEST:

* plant-specific schedule for the implementation of the GIP and submission of a report to the staff that summarizes the results of the USI A-46 review, if

NRC REQUEST (CONT'D)

you are committing to implement GIP-2. This schedule shall be such that each affected plant will complete its implementation and submit the summary report within 3 years after the issuance of the SSER No. 2, unless otherwise justified.

GPU NUCLEAR RESPONSE:

At this time, our plan is to complete and submit the results of our USI A-46 review by May 22, 1995, within three (3) years after the issuance of the SSER No. 2. However, recognizing the allocation of in-house resources and availability of outside consultants to support an expedited completion of the TMI-1 USI A-46 and IPEEE efforts, and the currently planned workdowns in 15R outage (Winter 1994 and 1995) for the OCNGS USI A-46 and IFEEE, completion of the OCNGS USI A-46 could be impacted. GPU Nuclear is expending every effort to complete the OCNGS USI A-46 by May 22, 1995, but no later than September 30, 1995. The OCNGS Integrated Schedule is being revised accordingly.

This schedule reflects the most expeditious completion date possible considering present outage schedules.

NRC REQUEST:

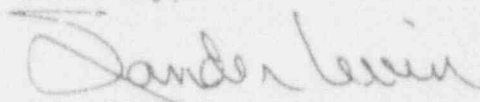
The detailed information as to what procedures and criteria were used to generate the in-structure response spectra to be used for USI A-46 as requested in the SSER No. 2. The licensee's in-structure response spectra are considered acceptable for USI A-46 unless the staff indicates otherwise during a 60-day review period.

GPU NUCLEAR RESPONSE:

For defining seismic demand, GPU Nuclear will use the options provided in the GIP for median-centered and conservative design in-structure response spectra, as appropriate, depending on the building, the location of equipment in the building and characteristics of the specific piece of equipment. When the most appropriate option involves the use of SSE in-structure response spectra, GPU Nuclear intends to use newly developed in-structure response spectra. These spectra are being developed consistent with standards and guidance given in the NRC's Standard Review Plan and uses as input site-specific ground response spectra approved by the NRC on May 18, 1992. These spectra are considered by GPU Nuclear to be conservative design response spectra.

If you have any questions concerning the information provided in this letter, please call Mike Laggart, Manager, Corporate Licensing at (201) 316-7968.

Sincerely,



for John J. Barton
Vice President and Director
Oyster Creek

JJB/YN:lga

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