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February 8, 1993  
C321-93-2048

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Request for Scheduler Relief from ASME XI, IWA-5214 (a) and (b)

By letter dated April 16, 1992, GPU Nuclear submitted the Inservice Inspection (ISI) Program for the third ten year interval at the Oyster Creek Nuclear Generating Station. As directed by 10CFR 50.55a, the ISI Program was written to meet the 1986 edition of ASME XI, with no addenda. USNRC approval of this program has not been received.

In accordance with 10CFR50.55a(a)(3)(i) and (ii), this letter is being written to request a one time scheduler relief from the requirements of ASME Section XI, IWA-5214(a) and (b). These sections specify that if a repair to a Class 3 boundary is performed, a system hydrostatic pressure test shall be performed. GPU Nuclear is requesting permission to delay the performance of the hydrostatic test until the next refueling outage (15R), presently scheduled to commence in October 1994.

During the first few days of the current refueling outage (14R), the need to perform a Code Class 3 repair to a section of Condensate Transfer piping was identified. The Condensate Transfer system had been scheduled for a brief outage, to allow for the correction of a non-related concern. During this outage, a repair weld was completed in accordance with Code requirement 3. However, the previously scheduled time available to remove the Condensate Transfer system from service did not allow for the planning or implementation necessary to perform the system hydrostatic test.

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In March 1991 during the previous refueling outage (13R), the Oyster Creek Station experienced a loss of electrical power supply redundancy. The NRC dispatched an Augmented Inspection Team which subsequently issued Inspection Report 50-219/91-80. The cover letter to that report states in part:

"...concerns were raised regarding your (GPUN's) approach to outage planning and scheduling that did not include an evaluation of plant vulnerability with respect to equipment configurations..."

GPUN addressed this comment in a serious and expeditious manner, resulting in defined Risk Management Plant Configurations for 14R. These conditions ensured that multiple sources of cooling, water inventory, reactivity control, and electric power were defined and available at all times during the present outage. To meet this requirement, extensive credit was taken for the Condensate Transfer system during nearly the entire outage.

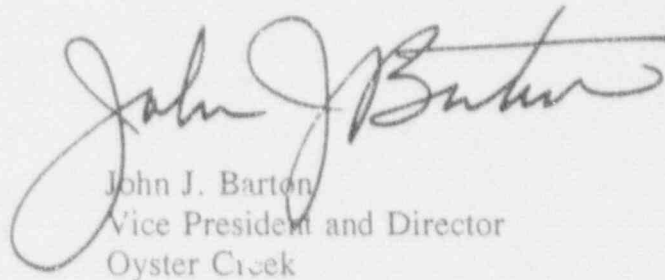
In the 14R outage schedule, the short system outage on Condensate Transfer to address a non-related concern was utilized to work the leak repair in parallel with the previously scheduled maintenance. However, due to the late discovery of the newly required maintenance, there was insufficient time to allow for the scheduling of a longer window to allow for the ASME hydrostatic test.

This delayed test was carried as an open item for the remainder of the outage. It was anticipated that emergent work could result in a second Condensate Transfer outage window. However, the end of 14R is presently scheduled within a few days of this letter and no additional system availabilities have emerged. It is not possible to remove this system from service during the run cycle. Therefore, by this letter, GPUN is requesting schedular relief to postpone the system hydrostatic test on the weld repair to the Condensate Transfer system to our next refueling outage, 15R.

The Condensate Transfer system was designed for 200 psig and 100°F. Therefore the system hydrostatic test required by the Code would be performed at 220 psig. As interim examinations, a system inservice leak test was performed at 165 psig, and a VT-2 inspection was completed. No leakage was noted. Additionally, a 100% dye penetrant (PT) test was performed to locate any surface indications. None were found.

Based on the low temperature and pressure of this system, and the Code inspections which have been performed, this repair has been determined to be technically acceptable for operation until a full hydrostatic test can be performed next outage. Additionally, this relief, if granted, will allow time to plan and schedule the requisite system outage for Condensate Transfer during 15R while still ensuring that adequate sources of water are available for the plant in all outage Risk Management configurations.

If any additional information or assistance is required, please contact Mr. John Rogers at 609.971.4893.



John J. Barton  
Vice President and Director  
Oyster Creek

JJB/JJR

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