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October 12, 1996  
6730-96-2313

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Inspection Report 50-219/96-03  
Reply to Notice of Violation

NRC Inspection Report 50-219/96-03 documented a violation of 10 CFR Part 50, Appendix B, Criteria XVI for a modification to the Containment Spray System. The NRC staff determined that a modification resulted in the piping experiencing significant vibration during system operation, and a technically based assessment of the condition was not performed in a timely manner.

GPU Nuclear took exception to this severity level IV violation in our June 28th letter (6730-96-2215). GPUN's evaluation concluded a condition adverse to quality never existed with respect to the piping vibration. In NRC's letter dated September 13th, it was concluded that actions taken were appropriate for assessing the impact of the vibration and verifying operability of the system. However, corrective actions were inadequate to make a timely, technically based assessment of the original condition, and a formal evaluation should have been completed earlier in the process. Based on this fact a response to the original cited violation #3 was requested.

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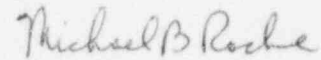
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6730-96-2313

Page 2

Attachment 1 replies to this Violation as required by 10 CFR 2.201. If you should have any questions or require further information, please contact George Busch, Manager, Oyster Creek Regulatory Affairs at (609) 971-4643.

Very truly yours,



Michael B. Roche  
Vice President & Director  
Oyster Creek

MBR/DGJ

Attachment

cc: Administrator, Region I  
NRC Project Manager  
NRC Resident Inspector

**ATTACHMENT 1**  
**RESPONSE TO NOTICE OF VIOLATION**  
**INSPECTION REPORT 50-219/96-03**

**Violation 3:**

10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," specifies required criteria for quality assurance programs for nuclear power plants. Criteria XVI, "Corrective Actions," states, in part, "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

Contrary to the above, in November of 1984, GPU Nuclear installed a modification to the Oyster Creek Containment Spray subsystem that resulted in the system experiencing significant vibration during system operation, and a condition adverse to quality existed at the facility, namely, the failure to perform a technically based assessment of the impact of the vibrations of the Containment Spray subsystem, and this condition adverse to quality was not identified and was not performed until after a licensee Service Water System Operational Performance Inspection Team noted the condition in December of 1995 following which the licensee made a technically based assessment of this degraded condition on system operability.

**Response:**

GPU Nuclear, Inc. did not concur with the violation. However, GPUN accepts the NRC review of our response.

**The reason for the violation:**

The test engineer and system engineer both observed the level of pipe vibration during a post modification test for the installation of an orifice plate during the 15R outage. An onsite structural engineer evaluated the pipe vibration, but did not consider it significant enough to justify the installation of targets and taking vibration/displacement data that would be needed for a formal quantitative assessment. This entire sequence of events including the structural engineer's evaluation was not documented at the time of the modification.

**The corrective Steps taken and the results achieved:**

During our Service Water System Operational Performance Inspection in 1995, the team challenged the piping vibration. In response, the piping was instrumented, detailed vibration/displacement data was recorded, and a formal assessment was performed

The results of this assessment confirmed the original engineering judgment that the pipe vibration did not present a safety concern and that the piping was adequately supported.

Additional concern expressed by the NRC inspector led to instrumenting a second point on the piping system so that relative movements could be obtained and a more quantitative stress calculation could be performed. The results of this evaluation confirmed that the pipe met the B31.1 stress allowable limits and that the system would not fail in fatigue.

**The corrective steps that will be taken to avoid further violations**

Although the vibration issue was addressed informally at the time of the modification, a more formal evaluation for the level of vibration that was present was warranted. Also, the application of the requirements of the Post Modification Test Program for monitoring piping vibration required improvement. These two items were addressed by "Required Reading" of this event by all StartUp & Test and System engineers.

Since the newly integrated engineering organization no longer includes a dedicated Startup & Test function, management has prepared an "Engineers Communication" which will be forwarded to all engineering personnel. Specifically, the Communication expresses management's expectations relative to formal documented data collection and evaluations for future modifications.

**The date when full compliance will be achieved:**

The engineers completed the "Required Reading" on September 17, 1996. The "Engineers Communication" will be forwarded to the newly integrated engineering organization by October 31st.