



GPU Nuclear Corporation

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May 30, 1985

Mr. Harry B. Kister, Chief
Division of Project and Resident Programs
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Mr. Kister:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection 85-06

This letter is submitted in response to your letter of April 9, 1985, regarding the findings of February 4 - March 3, 1985 inspection by Messrs. W. H. Baunack, W. H. Bateman, and J. Wechselberger of your staff. GPUN's submittal dated May 10, 1985 provided our response to the violations. The Attachment to this letter delineates actions taken to address the discrepancies associated with the modified Core Spray System instrumentation.

If there are any questions regarding the supplied information, please contact Mr. Drew Holland of my staff at (609)971-4643.

Very truly yours,

Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF/KB/dam
Attachment
(0518A)

cc: Dr. Thomas E. Murley, Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
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ATTACHMENT

Item 1

The valve lineup contained in Station Procedure 308 was inconsistent with the P&ID in that valves were improperly identified both by valve number and valve description. Investigation into this discrepancy determined that the administrative system designed to control the flow of paperwork resulted in a time lag in information flow between Technical Functions and Plant Engineering. In particular, Technical Functions issued the original construction drawings for the modification. Plant Engineering used these drawings to generate a modified valve lineup. However, Field Changes to the construction drawings issued by Tech Functions that modified the original drawings were not immediately delivered to Plant Engineering but were routed through the normal administrative system. The time delay associated with this system resulted in Plant Engineering being unaware of the changes and pre-empted them from generating a correct valve lineup.

Item 1 Response

The immediate corrective action taken was to provide Plant Engineering with copies of all Field Change Requests (FCR) to enable them to execute the proper Operating Procedure revision.

Additionally, the "advance" distribution of FCRs made by Technical Functions Site Office has been expanded to include the Plant Engineering Department.

Item 2

There were inaccuracies between the as-built P&ID and the as-built condition in the plant. Tech Functions had the responsibility to generate an as-built P&ID. This is normally accomplished by modifying the original construction drawings to incorporate all Field Changes. Ideally, if the Field Changes are accurate, the final drawing will represent the as-built condition. It is not a requirement that the Tech Functions designer responsible for this activity go into the field to verify the correctness of the as-built drawing. A review of the Field Changes and the original drawings indicated that, had the designer not made errors in his work, the as-built drawing would have been accurate. However, drafting errors were made by the designer and the result was an incorrect as-built P&ID. The inspectors will review future as-built P&IDs to ensure this type of problem was isolated.

Item 2 Response

The immediate corrective action was to place a corrected (marked-up) P&ID for the Core Spray System in the Control Room and Technical Support Center. This was accomplished on February 22, 1985. Additionally, a revised (preliminary revision) P&ID was developed and issued for distribution to controlled copyholders of "Control Room" drawings on March 1, 1985.

Since this was an isolated case of a drafting error, Design/Drafting was counselled on the need for accuracy in performing drawing checks.

Item 3

A review of Functional Test Procedure T/P 321/1, Core Spray Booster Pump Differential Pressure Switch Operational Checks, determined that the procedure did not require a valve lineup prior to performance of the test. The reason for this, in part, was that the test procedure was being written in parallel with the installation of the modification and valve lineup revision by Plant Engineering. It is not accepted practice to perform functional tests without first lining up the system in accordance with an approved valve lineup.

Item 3 Response

Item 3 states that T/P 321/1 did not require a valve lineup prior to performance of the test. Actually, Sections 7.1.3.1 and 7.2.3.1 of T/P 321/1 required the differential pressure switches (RV 40 A, C, B, D) to be filled and vented and valved into service prior to performing Section 9.1.2 and 9.2.2 of the test procedure, respectively. However, a specific valve lineup was not included in the test procedure.

In order to provide more clarity, Startup and Test engineers were instructed to include valve and breaker lineups in functional test procedures, when they deviate from normal operating procedure valve lineups. They were also instructed to include specific "as left" valve and breaker lineups in functional test procedures that list, as a minimum, the as left positions of newly installed valves and breakers and the as left positions of those valve and breakers manipulated during test performance.

This instruction was provided to the Startup and Test engineers verbally and a "Department Guidance" memo was issued on May 29, 1985 to clarify the intent of Startup and Test Program Documents.