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Writer's Direct Dial Number:
October 21, 1985

Mr. John A. Zwolinski, Chief
Operating Reactors Branch No. 5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Zwolinski:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Reporting Requirements of 10CFR50.72 and 50.73

Reference: NRC letter dated May 30, 1985 - J. A. Zwolinski to P. B. Fiedler (GPUN)

This letter is in response to three (3) requests identified in your letter of May 30, 1985.

The first two requests address the inclusion of the Independent On-Site Safety Review Group (IOSRG) and the Vice President of each GPU Nuclear Division into the in-line review of the Licensee Event Reports (LERs). It is GPUN's belief that this would be an unnecessary addition to the existing review cycle. The existing Oyster Creek License, Technical Specifications, and/or the resultant implementing procedures require LERs to be reviewed by:

1. A Responsible Technical Reviewer who is a knowledgeable individual other than the individual(s)/group which performed the investigation; and
2. A qualified Independent Safety Reviewer who does not have direct responsibility for the performance of the activities under review.

The Technical Specifications also require that:

1. Each reportable event be reported to the cognizant manager, the cognizant division Vice President, and the Vice President and Director Oyster Creek; and
2. Copies of all such reports shall be submitted to the functionally cognizant division Vice President and the Vice President and Director Oyster Creek.

GPUN believes that this review process encompasses and exceeds the criteria of both Generic Letter 84-43 and NUREG 0123, Rev. 3 (BWR Standard Technical Specifications).

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The IOSRG was created to perform a selective overview function for matters involving safe operation. The addition of the IOSRG to the in-line review would add an additional administrative load which may jeopardize the selection of other subjects they deem necessary to review. Our intent is to maintain the selectiveness of the overview function. The IOSRG at Oyster Creek is however, on distribution for all LERs submitted to the NRC from Oyster Creek and may, by Technical Specification 6.5.4.3(5), review any and all the LERs to whatever extent the Manager-Nuclear Safety deems appropriate.

The third request was for GPUN to change the wording of Technical Specification 6.10.1.c. from "Reportable occurrence reports" to "All Reportable Events". GPUN concurs that this change in wording is appropriate. A future Technical Specification Change will be requested to incorporate the nomenclature changes.

If there are any questions please contact Mr. Michael Laggart at (201) 299-2341.

Very truly yours,



Peter B. Medier
Vice President and Director
Oyster Creek

PBF:MWL:gpa
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