GPU Nuclear

GPU Nuclear Corporation
100 Interpace Parkway
Parsippany, New Jersey 07054-1149
(201) 263-6500
TELEX 136-482
Writer's Direct Dial Number:

August 9, 1985

Director, Division of Licensing
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Generic Letter 83-28

Pursuant to our letter of November 20, 1984, please find attached our response to Item 4.5.1 of Generic Letter 83-28. Item 4.5.1 addresses system functional testing of the reactor trip system.

Very truly yours,

J. B. Fiedler
Vice President and Director
Oyster Creek

lr/1985f

cc: Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, N. J. 08731

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ATTACHMENT

Oyster Creek Nuclear Generating Station
Generic Letter 83-28
Item 4.5.1

4.5 Reactor Trip System Reliability (System Functional Testing)

Position

On-line functional testing of the reactor trip system, including independent testing of the diverse trip features, shall be performed on all plants.

1. The diverse trip features to be tested include the breaker undervoltage and shunt trip features on Westinghouse, B&W (see Action 4.3 above) and CE plants; the circuitry used for power interruption with silicon controlled rectifiers on B&W plants (see Action 4.4 above); and the scram pilot valve and backup scram valves (including all initiating circuitry) on G.E. plants.

Response

On-line functional testing of the scram pilot valves and associated initiating circuitry is conducted at the Oyster Creek Nuclear Generating Station.

During normal system operation, each of the two Reactor Protection System (RPS) buses energize one of the two three way solenoid operated diaphragm scram inlet and outlet valves. Routine surveillance testing of the RPS sensors dictates placing the RPS in a half scram mode and results in actuation of the scram pilot valves. In addition, rod insertion time surveillance testing, in which individual rods are scrammed manually and timed, provides direct verification of the operability of the associated pilot scram valves. Surveillance testing requirements related to the scram pilot solenoid valves assure that the probability of undetected failure of these independently acting solenoid valves is small.

The instrument air header to all scram pilot valves has two backup scram pilot valves. Like scram pilot solenoids, backup scram solenoids are actuated by the RPS. Deenergization of the RPS actuation relays, via RPS surveillance testing, would result in deenergizing the backup scram solenoid coil and opening the valve. Functional testing of backup scram valves would require a plant scram, as a result such testing is not performed. The backup scram valves are non-safety related and are intended only to enhance the reliability of the safety related trip system. No explicit credit is taken for these valves in plant safety analysis.