



GPU Nuclear Corporation

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October 9, 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
Supplemental Response to Inspection Report 85-13

This letter is being written to provide documentation of GPU Nuclear's position on "as-built" drawings and to correct a typographical error contained in IE Inspection Report 50-219/85-15.

Inspection 85-13, conducted April 1 to May 5, 1985 and issued June 7, 1985, requested a commitment date when all safety related as-built drawings would reflect the as-found conditions of the plant. Subsequently, on May 20, 1985, a meeting between GPUN and the USNRC was held in the Region I headquarters, regarding IE Inspection 85-14. During this meeting, GPUN provided all the as-built drawing information which had been requested at the exit meeting for Inspection 85-13. The NRC documented this information in IE Inspection Report 85-15, Section 3, "Management Meeting". On page 5 of Inspection Report 85-15, the statement is made "The program is expected to cost approximately \$800 million..." This is an error. The program is expected to cost approximately \$8 million.

For the purpose of clarity and accuracy, GPU Nuclear's position on as-built drawings is repeated below:

As discussed in Paragraph 15.6 of your letter dated June 7, 1985 which documented results from Inspection 50-219/85-13, GPUNC has an ongoing multimillion dollar project to update drawings at Oyster Creek. The program involves documenting the as-built configuration of 227 items which are viewed as important to operations and maintenance. An item can be as large as an entire fluid system or as small as an instrument rack. When a

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fluid system is documented, the scope includes flow/P&ID changes, list changes (valve, instrument, etc.), gathering nameplate data on in-line components and assigning tag numbers, if missing. When an electrical cabinet is documented, the scope includes a hand over hand wire check internal to the cabinet, electrical drawing changes (internal wiring, elementary, interconnections, and single line), nameplate data, list changes and assigning tag numbers, if missing.

The scope described above is extensive and requires a careful pre-planned approach. On the average, electrical items require 140 manhours and mechanical items 570 manhours to complete the walkdown/documentation. We have completed documenting 104 items. There are 38 items which require a plant outage and the remaining 85 items are being documented on a planned schedule. Based on our plan, we expect the documentation of the 227 items to be completed by the fall of 1986.

When the documentation of an item is completed, an "as-found" Field Change Notice (FCN) is issued and posted in CARIRS, a computer based record retrieval system, thus capturing the as-built configuration of the portion of the drawing associated with the item walked down. At Oyster Creek, the combination of the original drawing and the FCN postings in CARIRS represents the as-built condition of the drawing.

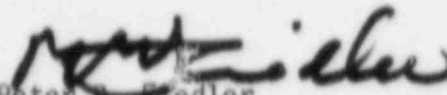
Configuration changes documented by "as-found" FCNs are reviewed by Technical Functions engineers. Although there have been configurations identified which Technical Functions engineering decided should be changed, only one preliminary safety concern and no reportable items have been identified to date. This provides confidence in the continued safe operation of the Oyster Creek plant.

GPUNC is continuing to work to improve the Oyster Creek drawing system. The drawing program is being expanded to address items such as drawing quality (some drawings may be redrawn), drawing content (drawings with a content more suitable to operations and maintenance may be prepared) and timeliness of updating the graphics (where an actual update is required). Implementation of the overall program will take years and will undoubtedly be subject to mid-course corrections based on experience and need. We would welcome the opportunity to periodically meet with you to describe our program, schedule, and progress. We are confident that the program we are embarked on, which goes beyond the limits of strictly safety-related items and of just updating the drawings, demonstrates our commitment to improving the Oyster Creek drawing system.

Mr. Harry B. Kister, Chief
U.S. Nuclear Regulatory Commission
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If any further information or assistance is required, please contact Mr. John Rogers of my staff at (609)971-4893.

Very truly yours,



Peter B. Fiedler
Vice President and Director
Oyster Creek

PBF/JR/dam
(0084A)

cc: Dr. Thomas E. Murley, Administrator
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