



GPU Nuclear Corporation

Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

November 14, 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
Technical Specification Change Request No. 141

During a telephone conference held on November 12, 1985, the NRC raised the matter of assurance of satisfactory return of the reactor water level "low" and "low-low" instruments to service. In response to their concern, GPU Nuclear is providing information in the following areas:

- a) administrative controls to assure proper return to service of instruments involved following functional tests, surveillances, and/or calibrations;
- b) rationale that the modification involving these instruments;
 - 1. does not increase the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report; or
 - 2. the possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report has not been created; or
 - 3. the margin of safety as defined in the bases for any Technical Specification has not been reduced;
- c) a description of any measures being taken to compensate for new instrumentation not possessing visual level indication features.

Because the reactor protection system instrumentation involved is so critical to nuclear safety, valve lineups to be performed following calibrations, surveillances, and/or functional tests are always independently

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verified. Furthermore, personnel performing final verification valve lineups are at least qualified instrument technicians. A plant procedure controlling instrument surveillance valve lineups will be revised to state that a "hands-on" independent verification is required wherever "independent valve lineup verification" (or similar wording) is used in applicable procedures. It should be noted that a "hands-on" verification has been the established practice in the past. The redundancy of lineup checks and the level of qualification of personnel involved will provide substantial administrative verification that instruments will be properly aligned following calibrations, surveillances and functional tests. Pursuant to our discussion with you on November 12, 1985, Procedure 619.3.013, "Reactor Low Level Test and Calibration", was sent to the Oyster Creek Project Manager. Contained in it are many of the elements described above.

A 10CFR50.59 safety evaluation has been performed to review the modification in accordance with GPUN Procedure 5000-ADM-1291.01. In this regard, no unreviewed safety questions exist. The NRC staff had raised a concern of assuring that instrument header communication exists with the reactor vessel during operation. In response to this, GPUN has proposed in a revision to TSCR 141 that instruments RE 21 A and B in the control room be monitored to provide this assurance. In addition to the non-indicating instruments, the following instruments exist for the operator to observe reactor water level and take manual corrective action, if necessitated by plant conditions:

RE 21 A and B (Control Room, 85"-185" above-top-of-active fuel (ATAF), Rosemount transmitter/Westinghouse indicator)

ID 59 A and B (Control Room, GEMAC, 89"-184" ATAF)

A probabilistic risk assessment (PRA) has been performed to consider instrument valve realignment errors and instrument valve failures. In this regard, no significant reduction in margin of safety exists.

The instrument upgrade modification has been designed to maintain design basis criteria of electrical and mechanical separation and single failure considerations. All automatic engineered-safety-system logic as described in licensing basis documents remains as originally designed. Several visual indicating devices have been retained for operator use and for anticipation of automatic functions. In addition, the valve manifolds in question have been constructed under the auspices of ASME Section III and installed utilizing the GPUN Operational Quality Assurance Plan. In this regard, a high level of system cleanliness (ANSI N45.2.2) has been achieved through system flushes following construction.

Based on the current knowledge of outage 10M progress, startup operations are expected to commence on November 16, 1985 with a turbine-on-line date of November 18, 1985.

In the event that any comments or questions arise, 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/DH/dam
(0099A)

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

Mr. Jack N. Donohew, Jr.
U.S. Nuclear Regulatory Commission
7220 Norfolk Avenue, Phillips Bldg.
Bethesda, MD 20014
Mail Stop No. 314

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, NJ 08731