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June 17, 1997
6730-97-2173

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inspection Report 97-02
Reply to a Notice of Violation

By letter dated May 19, 1997, the USNRC docketed Inspection Report 50-219/97-02. Enclosure I to that Report contained a Notice of Violation. Attachment I to this cover provides the requisite reply to the violation.

If any additional information or assistance is required, please contact Mr. John Rogers of my staff at 609.971.4893.

Very truly yours,

for Michael B. Roche
Vice President and Director
Oyster Creek

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MBR/JJR
Attachment

250021

cc: Administrator, Region I
NRC Project Manager
Senior Resident Inspector



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Attachment 1

NRC Notice of Violation

Code of Federal Regulations, Title 10, Energy, Part 50.59, "Changes, Tests, and Experiments", section (a)(1), states that the holder of a license: (i) may make changes to the facility as described in the safety analysis report, and (ii) make changes in procedures as described in the safety analysis report without prior Commission approval, unless the proposed change involves a change in the Technical Specifications or involves an unreviewed safety question. Section (b)(1) states that the licensee shall maintain records of changes...made pursuant to this section. Those records must include a written safety evaluation which provides the basis for the determination that the change does not involve an unreviewed safety question.

Contrary to the above, a permanent change (December 1995) was made to the facility as described in the safety analysis report (SAR) involving the removal of the isolation condenser radiation monitors without considering all relevant portions of the Updated Final Safety Analysis Report to determine if an unreviewed safety question existed. Specifically, Section 1.9.31 of the UFSAR, a section containing commitments regarding the isolation condenser system radiation monitor, was not considered or assessed in a written safety evaluation, prior to the removal of the radiation monitor, in order to provide the basis that the change did not involve an unreviewed safety question.

GPUN Reply To Notice Of Violation

GPUN concurs with the violation as written.

During the summer of 1995, Safety Evaluation (SE) 000661-017 was written to address a proposed modification to the Isolation Condenser system. The Final Safety Analysis Report (FSAR) review concentrated on the section of the FSAR which described the Isolation Condenser system (11.5.2.3). Two needed changes to the FSAR were identified, and Preliminary FSAR Update (PFU) 10-005 was initiated to revise the FSAR as required.

During the first quarter of 1997, PFU 10-005 was being reviewed as part of the normal FSAR update submittal process. During this GPUN review, four additional sections (1.9.31, 6.2.2.2, 6.3.1.1.2, and 6.1.1.3) were identified by using a computer search of the FSAR. The computer search capability did not exist in 1995. Additional PFUs were initiated to update the newly identified sections.

Section 1.9 of the FSAR summarized NUREG 0737 commitments which had been made by GPUN. Section 1.9.31 addressed the GPUN response to the NRC request that Isolation Condenser High Radiation Isolation signal sensors be moved from the steam inlet piping to the condenser vent piping to improve the reliability of the Isolation Condensers. GPUN responded by stating that the Isolation Condensers at the Oyster Creek Nuclear Generating Station did not isolate on high radiation levels, but rather, isolated on high steam flow or high condensate flow. This position was accepted by the NRC, who stated that no modifications were necessary.

Reason for the Violation

The violation occurred due to the inadequate review of the FSAR which was performed in 1995. Neither the Preparer, nor the Responsible Technical Reviewer, nor the Independent Safety Reviewer looked in FSAR Section 1.9.

Corrective Steps Taken and Results Achieved

A Plant Review Group meeting was held to evaluate the portions of the FSAR which had been missed during the original review and approval cycle. The PRG determined that the missed portions of the FSAR did not impact the safety of the modification. Further, it was determined that Section 1.9.31 had been incorrectly summarized from the original docketed letters. A PFU to correct Section 1.9.31 was submitted for inclusion in the next FSAR update.

Revision 2 to SE 000611-017 was initiated and approved on March 25, 1997, to capture the newly identified changes.

In response to similar violations docketed in prior inspection reports, a self assessment on the safety review/50.59 process had been undertaken. One of the noted areas for additional emphasis was the need to search the entire FSAR while performing safety reviews. Training on the use of the new computerized FSAR for safety reviews was given to the qualified Preparers, Responsible Technical Reviewers, and Independent Safety Reviewers at Oyster Creek. Additionally, other licensing basis documents have been entered into the computer to aid safety reviewers in the search of docketed materials.

Date When Full Compliance was Achieved

The nuclear power plant was in full compliance with regulatory requirements at all times.

Full compliance with the regulatory review requirements for the modification was achieved with the issuance of Revision 2 to SE 000611-017 on March 25, 1997.