

**GPU Nuclear**

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Writer's Direct Dial Number:

June 23, 1982

Mr. Ronald C. Haynes, Administrator  
Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Haynes:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Licensee Event Report Submittal Clarification  
Reportable Occurrence No. 50-219/82-14/01T

The submittal of the subject Licensee Event Report (LER) was not in strict compliance with the station's Technical Specifications, paragraph 6.9.2.a. Immediate notification was not made nor was a preliminary report forwarded within twenty-four hours. However, immediate notifications, preliminary, and followup reports were made, pursuant to paragraph 6.9.2.a.3 of the Technical Specifications, to report primary containment degradations found as a result of failure to meet local leak rate acceptance criteria where the failure was that of a penetration (Reportable Occurrence Nos. 82-19 and 82-20).

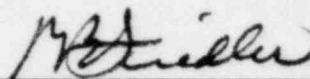
It was originally thought that single failures of redundant primary containment isolation valves or gaskets to meet local leak rate acceptance criteria did not constitute a reportable occurrence, but would be incorporated into the report of integrated and local leakage rate test results required by Technical Specifications, paragraph 4.5.H. During the course of NRC IE Inspection No. 82-06, the inspector pointed out that these types of single failures were indeed reportable occurrences per Technical Specifications. The inspector's remarks were misinterpreted as requiring the submittal of an LER per Technical Specifications, paragraph 6.9.2.b (30 day report), and, as a result, immediate notification was not made nor a preliminary report submitted. During final review of the subject LER, the appropriate reportability requirement was realized and submittal was made as a final report pursuant to paragraph 6.9.2.a.

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In order to provide unified and cohesive reporting of future primary containment degradation, discovered during the performance of local leak rate tests during outage periods when containment isolation is not required, initial notification will be made, followed by a single LER supplement after completion of all local leak rate tests.

Very truly yours,



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Peter B. Fiedler  
Vice President and Director  
Oyster Creek

PBF:PFC:lse

cc: Director (40 copies)  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Director (3)  
Office of Management Information and  
Program Control  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

NRC Resident Inspector (1)  
Oyster Creek Nuclear Generating Station  
Forked River, NJ 08731