

JUL 24 1986

Docket No. 50-219

GPU Nuclear Corporation
ATTN: Mr. P. B. Fiedler
Vice President and Director
Oyster Creek Nuclear Generating Station
P. O. Box 388
Forked River, NJ 08731

Gentlemen:

Subject: Inspection 50-219/86-06

In your letter of June 24, 1986 regarding our inspection report 50-219/86-06, you took issue with Violation B(2). This matter has been brought to my attention because you stated that you did not agree with the violation.

This matter involved the assignment of a Preliminary Engineering Design Review (PEDR) Chairman for the 480 volt vital transformer cooling fan modification, BA402786, who was not independent of the engineering or managing of the design package as required by Technical Functions Division Procedure EMP 014, Project Reviews. In your response you stated the detailed engineering for this project was assigned to General Electric and, as such, the responsible GPUN manager was not directly responsible for managing the engineering details and, therefore, was eligible to function as the PEDR Chairman. EMP 014 clearly states the PEDR Chairman in the capacity as the Responsible Technical Reviewer (RTR) "shall not have been involved in engineering or managing the design." In this case the PEDR Chairman was responsible for and involved in managing the design of BA402786. Although we recognize that the individual may not have been involved in the "engineering details" as indicated in your response, our view is that the intent of the procedure is to obtain a separate overview of the matter. It is not clear by your response as to how this separate review was accomplished. In our view the assigned individual was ineligible to perform the RTR function.

We have evaluated your response and have reviewed again our original findings, concluding the citation is valid. Accordingly, you are required to respond within 20 days of the date of this letter. Your response should explain what corrective steps will be taken to assure that both the intent and spirit of independent review is not compromised.

Thank you for your attention in this matter.

Sincerely,

Original Signed By:

Richard W. Starostecki, Director
Division of Reactor Projects

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cc w/encl:

M. Laggart, BWR Licensing Manager
Licensing Manager, Oyster Creek
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New Jersey

lcc w/encl:

Region I Docket Room (with concurrences)
Management Assistant, DRMA (w/o encl)
Section Chief, DRP
Robert J. Bores, DRSS

B
for RI:DRP
Bateman
07/23/86

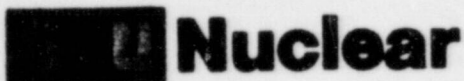
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GPU Nuclear Corporation
Post Office Box 388
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June 24, 1986

Mr. Harry B. Kister, Chief
Projects Branch No. 1
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

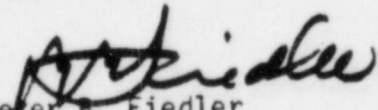
Dear Mr. Kister:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
IE Inspection Report 86-06

Attachments to this letter provides GPU Nuclear's responses to the identified violations in Appendix A of your letter dated May 12, 1986. As receipt of this report was delayed 9 days, an extension of the due date to June 25, 1986 was granted by the Resident Inspector at the Oyster Creek Station.

If any further information 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
Attachments

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
7920 Norfolk Avenue, Phillips Bldg.
Bethesda, MD 20014

NRC Resident Inspector
Oyster Creek Nuclear Generating Station

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ATTACHMENT I

Violation A:

Technical Specification 6.8.1 requires that written procedures shall be established, implemented, and maintained. Station Procedure 125, Revision 2, Conduct of Plant Engineering, delineates the functions, responsibilities, authorities, and organizational interfaces of the Plant Engineering organization. Paragraph 6.4 of this procedure requires that Plant Engineering tasks be prioritized and those tasks deserving immediate attention assigned a priority one rating. The procedure requires, in part, that a priority one rating be given to those tasks which, left undone, would cause a NRC commitment deadline to be missed.

- (1) Contrary to the above, as of April 3, 1986, Station Procedure No. 125 was not being maintained, as it relates to the tracking of engineering tasks. Significant discrepancies existed between procedural descriptions and requirements and the way the Plant Engineering organization was conducting activities. These discrepancies included the following areas: (1) description of the organization and responsibilities; (2) the performance of engineering tasks, including the initial review and assignment of engineering tasks, acknowledgement to the requestor, and the close out of tasks including response to the requestor; (3) the maintenance of records; and (4) the prioritization of plant engineering task assignments.
- (2) Contrary to the above, as of April 4, 1986, Station Procedure 125 was not adequately implemented, in that a Plant Engineering Work Request written August 19, 1985 by the Plant Materiel Department and received by Plant Engineering on August 20, 1985, had been given a priority two rating and was not scheduled for review. The issue involved lack of plans and procedures governing movement of heavy loads (NUREG-0612) using a portable crane at the intake structure in the vicinity of the emergency service water pumps. A Safety Evaluation, in part, documenting the licensee's commitments regarding movement of heavy loads, was issued June 21, 1983. In this document it was explained that movement of heavy loads at the intake was not a concern because the intake gantry crane had been removed but that, if at some time in the future this crane is placed back in service, an evaluation would be performed to ensure that NUREG-0612 criteria are satisfied. Although the gantry crane has not been placed in service, the use of a portable crane to move heavy loads is an equivalent situation.

Response:

- (1) GPUN concurs in the violation.

Immediate corrective action was taken to initiate a revision to Procedure 125. The requisite organizational description and delineation of responsibilities were revised and clarified. The engineering request tracking system description was updated to more

accurately describe the system presently in place listing engineering requests and tracking them to completion. The requirements for records management were revised to align with GPUN commitments to ANSI Standards. The prioritization methodology was redefined and formally proceduralized.

Full compliance was achieved with the issuance of Revision 3 to Procedure 125 on June 13, 1986.

(2) GPUN concurs in the violation.

The identified Plant Engineering Work Request (PEWR) was not evaluated in compliance with revision 2 of procedure 125 in effect at the time. However, the philosophy for prioritization had been modified, and a revision to procedure 125 had been initiated and was in the review cycle. This PEWR was evaluated to that revision.

The assignment of a priority two did not create a situation where the review of the PEWR was delayed. Per procedure 125, revision 3, priority (Category) two assumes the definitions previously designated as priority one. Priority one is now reserved for those tasks "which left undone, would require the plant to shut down (if operating) or prevent plant startup (if in shutdown)". Also a priority one classification does not necessarily imply "immediate action".

For immediate corrective action, a Technical Functions Work Request (#86-47) was written for an evaluation of the use of mobile cranes with respect to NUREG 0612.

Further corrective action was taken to revise and further define task priorities in procedure 125, Conduct of Plant Engineering. This action was completed on June 13, 1986.

ATTACHMENT II

Violation B:

10CFR50, Appendix B, Criterion V and Section 3 of the Oyster Creek Operation Quality Assurance Plan require, in part, that activities affecting quality be prescribed by and accomplished in accordance with documented instructions, procedures, and drawings.

Contrary to the above, as of March 27, 1986, the licensee failed to:

- (1) Follow the requirements of Technical Functions procedure EMP-014, Rev. 1-01, Project Reviews, by not issuing a Memorandum of Concurrence for modification packages BA 402786 and BA 402775.
- (2) Assign a Preliminary Engineering Design Review Chairman for BA 402786 who was independent of the engineering or managing of the design package as required by EMP-014.
- (3) Enforce the mandatory attendance requirements for the Operability, Maintainability, and Constructability Review for BA 402786 and BA 402775.
- (4) Properly schedule the Responsible Technical Review prior to the Safety Evaluation for BA 402775 as required by Tech Functions Procedures LP-009, Rev. 1-00, Independent Safety Reviews and EP-016, Rev. 0, Nuclear Safety/Environmental Impact Evaluations.

Response:

- (1) GPUN concurs in the violation.

The project engineers neglected to require a memo of concurrence and this omission was not detected by the Project Manager. All involved personnel were reminded of the procedural requirement to receive such a memorandum within 4 weeks of the PEDR.

Since the NRC review, memos of concurrence have been received for both projects.

Full compliance was achieved on June 18, 1986.

- (2) GPUN does not concur in the violation.

GPUN disagrees that this finding is not in accordance with procedure EMP-014. The detailed engineering for this project was assigned to General Electric, the manufacturer of the transformers. As such, the GPUN responsible manager was not directly responsible for managing the engineering details and, therefore, was eligible to function as the PEDR Chairman; i.e., RTR. In this case, the responsible manager did not compromise his RTR responsibilities of ensuring that "all the appropriate engineering concerns and safety considerations (were) addressed during the design process."

(3) GPUN concurs in the violation.

The intent of procedure EMP-014 is to ensure that all appropriate groups have the opportunity to participate in OMCR meetings. The term "mandatory attendance" in the current version of EMP-014 is being revised to say that it is mandatory that all appropriate groups be "invited".

Full compliance will be achieved when the revision to EMP-014 is issued, presently projected for December 1, 1986.

(4) GPUN concurs in the violation.

In this situation, the Project Engineer did not recognize that the PEDR Chairman served the role of RTR. The Safety Evaluation (Rev. 0) was consequently initiated and signed off by both the RTR (different from the PEDR Chairman) and ISR weeks before the scheduled PEDR Meeting. As a result of the PEDR Meeting, the Safety Evaluation was revised (Rev. 1) and the document was properly noted and signed off by the PEDR Chairman. (It should be noted that the PEDR Chairman recognized his responsibility to ensure that the PEDR Process addressed the entire Safety Evaluation and not just the changes from Rev. 0 to Rev. 1.) At the time of the NRC review, the revised Safety Evaluation had not been re-reviewed by the ISR to determine if the changes had a safety significance. Since that time, however, the Safety Evaluation (Rev. 1) has received another ISR and was found to be acceptable.

The personnel involved with this project have been instructed in the proper handling of Safety Evaluations and changes thereto.

Full compliance was achieved on June 13, 1986 when the ISR on Revision 1 to the Safety Evaluation was completed.