



GPU Nuclear, Inc.
U.S. Route #9 South
Post Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

July 21, 2000
1940-00-20170

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Exigent Technical Specifications Change Request No. 279

Pursuant to 10 CFR 50.(a)(5)GPU Nuclear Inc., operator of the Oyster Creek Nuclear Generating Station, Operating License No. DPR-16, requests an exigent change to the Technical Specifications. The change is requested to be considered under exigent conditions as the Oyster Creek Nuclear Generating Station is currently operating under a Notice of Enforcement Discretion and needs the requested change to prevent a shutdown of the reactor plant.


The requested change would remove a shutdown requirement with regard to the relief valve position indication system. An exigent change is requested as Oyster Creek Nuclear Generating Station is currently operating under a Notice of Enforcement Discretion.

The Technical Specification Change Request has been reviewed and approved by both Responsible Technical and Independent Safety Reviewers in accordance with Technical Specification 6.5.

A001

If you have any questions regarding this submittal, please contact Mr. John Rogers, of my staff, at 609.971.4893.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sander Levin". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Sander Levin, Acting Site Director
Oyster Creek Nuclear Generating Station

SL/JJR
Enclosures

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

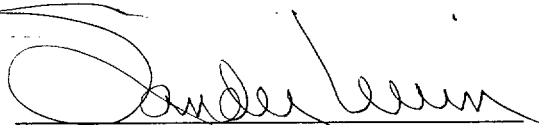
OYSTER CREEK NUCLEAR GENERATING STATION

OPERATING LICENSE
NO. DPR-16

TECHNICAL SPECIFICATION
CHANGE REQUEST NO. 279
DOCKET NO. 50-219

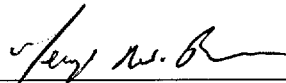
Applicant submits by this Technical Specification Change Request No. 279 to the Oyster Creek Nuclear Generating Station Technical Specifications, modified page 3.13-1 and 3.13-5.

By:



Sander Levin, Acting Site Director
Oyster Creek Nuclear Generating Station

Sworn to and Subscribed before me this 21 day of July, 2000



A Notary Public of New Jersey

GEORGE W. BUSCH
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Aug. 8, 2000

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
GPU NUCLEAR, INC.

DOCKET NO. 50-219

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 279 for the Oyster Creek Nuclear Generating Station Technical Specifications, filed with the U.S. Nuclear Regulatory Commission on July 21, 2000 has this day of July 21, 2000, been served on the Mayor of Lacey Township, Ocean County, New Jersey by deposit in the U.S. mail, addressed as follows:

The Honorable John C. Parker
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

By: 

Sander Levin, Acting Site Director
Oyster Creek Nuclear Generating Station



GPU Nuclear, Inc.
U.S. Route #9 South
Post Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

July 21, 2000
1940-00-20170

The Honorable John C. Parker
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

Dear Mayor:

Subject: Oyster Creek Nuclear Generating Station
Operating License No. DPR-16
Technical Specification Change Request No. 279

Enclosed is one copy of the Technical Specification Change Request No. 279 for the Oyster Creek Nuclear Generating Station Operating License.

This document was filed with the U.S. Nuclear Regulatory Commission on July 21, 2000.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sander Levin", with a large, sweeping flourish at the end.

Sander Levin, Acting Site Director
Oyster Creek Nuclear Generating Station

SL/JJR
Enclosure



GPU Nuclear, Inc.
U.S. Route #9 South
Post Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

July 21, 2000
1940-00-20170

Mr. Kent Tosch, Director
Bureau of Nuclear Engineering
Department of Environmental Protection
CN 415
Trenton, NJ 08628

Dear Mr. Tosch:

Subject: Oyster Creek Nuclear Generating Station
Operating License No. DPR-16
Technical Specification Change Request No. 279

Enclosed is one copy of the Technical Specification Change Request No. 279 for the Oyster Creek Nuclear Generating Station Operating License.

This document was filed with the U.S. Nuclear Regulatory Commission on July 21, 2000.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Sander Levin', written over a horizontal line.

Sander Levin, Acting Site Director
Oyster Creek Nuclear Generating Station

SL/JJR
Enclosure

ENCLOSURE 1

OYSTER CREEK NUCLEAR GENERATING STATION
OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 279

Applicant hereby requests the Commission to change Appendix A of the above-captioned license as follows:

1. Section to be Changed: 3.13

2. Change Requested:

Replace old pages: 3.13-1 and 3.13-5
with new pages : 3.13-1 and 3.13-5

3. Description of Change:

The requested change would remove a 48 hour shutdown requirement associated with the acoustic monitors on the Electromatic Relief Valves (EMRVs). The acoustic monitors provide an indication that an EMRV has closed after opening. This is an indication only, and provides no safety function. The requirement to have and maintain the EMRV Relief Valve Position Indicators will still be a part of the Plant Technical Specifications and the UFSAR. Additionally, Section 3.13.C of the Technical Specifications will still require that any inoperable EMRV position indicator be repaired prior to startup following the next cold shutdown after its failure. The EMRV primary and backup indication systems will continue to meet the basis of the Technical Specifications after the LCO requirements for the Acoustical Monitoring System have been changed.

The exigent need for the TSCR was a result of failed plant equipment. Realizing that the acoustic monitors could require a plant shutdown on short notice, Oyster Creek Nuclear Generating Station had previously installed spare monitors on all five EMRVs. It was believed that the redundancy of the components in the drywell would increase the reliability of the instrumentation. This is the first time in Oyster Creek history that both acoustic monitors on one EMRV were inoperable and unable to be repaired.

The requirement for the EMRV position indication system originated in NUREG 0737 Item II.D.3, "Direct Indication of Relief and Safety Valve Position." By letter dated May 8, 1980, the NRC accepted the design of the systems at Oyster Creek. The requirement to have and maintain a monitoring system to determine relief valve position is being maintained in Technical Specifications. The change being made only involves the LCOs associated with the EMRV position indication system (acoustic monitors and thermocouple indicators).

As delineated in NUREG 0873 a postulated stuck open relief valve (SORV) transient was analyzed to verify that the maximum pool temperature remains below the quencher instability temperature. The SORV analysis assumes that the operator will take actions to trip the reactor, initiate suppression pool cooling and initiate reactor depressurization in accordance with the Technical Specifications. The suppression pool temperature monitoring system provides the operator with safety grade, redundant pool temperature information from which to take actions in accordance with the EOPs and Technical Specifications. The EMRV Position Indication System does not affect the ability of the operator to obtain pool temperature information and no credit was taken for the position indicators when the Oyster Creek analysis for a SORV was performed. The suppression pool bulk temperature provides the necessary information to take actions that are consistent with NUREG-0783 pool temperature analysis. The Oyster Creek analysis indicates that the maximum pool temperature complies with the NUREG-0783 guidance. Therefore, operation with one or more failed EMRV position indications has no adverse impact on the containment SORV analysis.

The acoustic monitors associated with the EMRVs have no effect on the operation of the EMRVs, and have no impact on the probability of EMRV malfunction. They are the primary means of detecting EMRV position but not the only means. Alternate indications of an open EMRV exist including;

- Position of the DC actuation solenoid for each EMRV is available in the control room,
- EMRV tailpipe temperatures, and common discharge header temperatures,
- Suppression pool temperature and level,
- Reactor vessel level and pressure,
- Decrease in generator loads for the same reactor thermal output, and
- Steam flow/feed flow mismatch

All of these indications would provide adequate indication for prompt operator action should an EMRV fail to reseal after cycling open or spuriously open below its nominal set pressure. Operator training at Oyster Creek includes monitoring and evaluation of the additional indications that an EMRV is open.

In the event that the primary or backup indicator for one or more EMRV is inoperable, procedures controlling Plant operation would not be affected. Determination that an EMRV has failed open is controlled by an Abnormal Event Operating Procedure that uses many diverse indications to determine if an EMRV is open.

In the event it is determined that an EMRV is open and cannot be closed, a reactor Scram would be initiated and the Plant Emergency Operating Procedures (EOPs) would be entered, if required.

In the EOPs, the position of the EMRVs is important for two different reasons:

1. A stuck open EMRV is a primary coolant boundary degradation

This determination is important with regards to controlling the heat addition to the Primary Containment since a SORV is a loss of coolant accident. Thus it is important that the operator be able to determine if any EMRV is stuck open. As discussed above, several means exist for determining if an EMRV is open, of which the acoustical monitor is only one. Temperature indications of the combined EMRV downcomers are available to the operators, who are trained to use these indications as a backup to the acoustical monitors.

2. Verification that an EMRV is open

It is also important to be able to determine how many EMRVs are open when it is required to use them for RPV pressure control. Several conditions require the EMRVs to be used as the primary means of controlling and reducing RPV pressure and actions in the EOPs are predicated on how many EMRVs can be opened. Again the operators can use alternate methods for determining how many and which EMRVs are open. The EOPs do not dictate a specific means for this determination and the operators are trained to use all available means for making this and other determinations required by the EOPs.

In the event that an EMRV cannot be verified to be open when required, the EOPs will assume that the valve is closed and direct actions that are conservative with regards to pressure control in the RPV.

4. No Significant Hazards Determination

Pursuant to 10 CFR 50.91, this Technical Specification Change Request has been determined to contain No Significant Hazards. These evaluations are specified in 10 CFR 50.92.

This request has been determined to involve No Significant Hazards in that it does not:

1. Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated; (or)

This proposal will not increase the probability of occurrence or consequences of an accident previously evaluated in the SAR. The EMRV Position Indication System does not affect the operation of the EMRVs. No failure of the Position Indication System can affect the ability of these valves to perform their design functions or result in any condition where operation of one or more EMRVs is required. Failure of the Position Indication System to actuate in the event of an actual valve actuation does not affect the consequences of that event.

During an event when an EMRV malfunctions (SORV) there are alternate indications available to the operator to indicate the malfunction of the valve in the event that the Position Indication System fails. EMRV tail pipe temperature rise above normal levels is a reliable indication of EMRV actuation and a reliable indication of closure. The probability of a stuck open EMRV (SORV) Event is not affected by the lack of position indication for the EMRV. The ability to detect the stuck open EMRV condition is adequately covered by backup indication or secondary (e.g. RPV level, RPV pressure, and suppression pool temperature) indicators, and will not result in an increase in the probability or consequences of an accident previously evaluated. Operators will be able to determine that a SORV has occurred and procedures are in place to mitigate this condition that do not depend on the EMRV acoustical monitoring system for indication.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated; (or)

This proposal does not create the possibility for an accident or malfunction of a different type than any previously identified in the SAR. The EMRV Position Indication System performs no control or protective function. It only provides an indirect indication of valve position. Failure of this device will not cause an unanalyzed failure of an engineered safety feature. Because of the diverse and redundant indications available, failure of the position indication system will not cause a new accident, nor will it cause the operator to commit errors to create the possibility of a new or different type of accident. This proposal does not affect the method of operation or maintenance or surveillance requirements of the EMRV position indication system, only the LCOs associated with the EMRV position indication system.

3. Involve a significant reduction in a margin of safety

This change does not reduce the margin of safety of any Technical Specification. Operating without one of the two position indicators for an EMRV does not reduce the design or operating basis margin to safety. In the unlikely event of an SORV, sufficient backup indication is available to identify and mitigate the occurrence. The SORV analysis assumes that operator action is taken on bulk suppression pool temperature (including a time delay) and does not credit any operator actions initiated as a result of operation of the position indicator system.

Existing plant procedures provide sufficient guidance for detecting this condition and taking appropriate actions to mitigate an effect on continued safe operation. Thus, the proposed change does not involve a reduction in a margin of safety.

Operation of the plant with acoustic and thermocouple indication inoperable for a period of seven days does not reduce the margin of safety as the indicators perform no mitigation function and other plant parameters provide the information necessary to initiate any action. Existing analyses of abnormal or accident conditions do not credit operator actions initiated as a result of the EMRV position indicator system.

Enclosure II

Changed Pages

3.13 ACCIDENT MONITORING INSTRUMENTATION

Applicability: Applies to the operating status of accident monitoring instrumentation.

Objective: To assure operability of accident monitoring instrumentation.

Specification: A. Relief Valve Position Indicators

1. The accident monitoring instrumentation channels shown in Table 3.13.1 shall be OPERABLE when the mode switch is in the Startup or Run positions.
2. With no accident monitoring instrumentation operable for a relief valve as specified in Table 3.13.1, either restore any inoperable channel to operable status within 7 days, or place the reactor in the SHUTDOWN condition within the next 24 hours. If only the primary* detector or the backup** indicator on a relief valve becomes inoperable, no action is required. The provisions of 3.0.A do not apply.

B. Safety Valve Position Indicators

1. During POWER OPERATION, both primary* and backup** safety valve monitoring instruments are required to be OPERABLE except as provided in 3.13.B.2.
2. If the primary* accident monitoring instrument on a safety valve becomes inoperable, the primary* accident monitoring instruments on an adjacent valve, if OPERABLE, must have its set point appropriately reduced. When a reduced setpoint causes an alarm condition due to background noise, the setpoint may be returned to normal. If the backup** accident monitoring instrument on a safety valve becomes inoperable, no action is required. The provisions of Specification 3.0.A do not apply.

* Acoustic Monitor

** Thermocouple

TABLE 3.13.1

ACCIDENT MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>TOTAL NO. OF CHANNELS</u>	<u>MINIMUM CHANNELS OPERABLE</u>
1. Relief Valve Position Indicator (Primary Detector*)	1/valve	
Relief Valve Position Indicator (Backup Indications**)	1/valve	
2. Wide Range Drywell Pressure Monitor (PT/PR-53 & 54)	2	1
3. Wide Range Torus Water Level (LT/LR-37 & 38)	2	1
4. Drywell H ₂ Monitor	2	1
5. Containment High Range Radiation	2	1
6. High Range Radioactive Noble Gas Effluent Monitor		
a. Main Stack	1	1
b. Turbine Building Vents	1	1

* Acoustic Monitor

** Thermocouple

Thermocouple TE 65A can be substituted for thermocouple TE210-43V, W, or X

Thermocouple TE 65B can be substituted for thermocouple TE210-43Y or Z