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An Exelon/British Energy Company

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10 CFR 50.90

March 1, 2001
2130-01-20041

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

Subject: Oyster Creek Generating Station (OCGS)
Docket No. 50-219
Facility License No. DPR-16
Technical Specification Change Request No. 286

In accordance with 10 CFR 50.90, AmerGen Energy Company, LLC (AmerGen) requests NRC review and approval of a proposed change to the Appendix A Technical Specifications contained on page 4.5-3. The change described in Enclosure 1 would revise the frequency of closure time testing of the main steam isolation valves. If approved, these tests would no longer occur during power operation. They would be conducted during each cold shutdown unless this test has been performed within the last 92 days. The Technical Specification mark-up is contained in Enclosure 2. Camera-ready replacement pages will be provided to the NRC prior to issuance of the license amendment authorizing the change.

NRC approval of the change is requested by August 4, 2001. This is the due date for performance of the third quarter MSIV full closure surveillance. NRC approval by the requested date would allow AmerGen to avoid the significant reduction in power necessary to perform the test with its attendant challenge to operators and plant equipment. The avoidance of the power reduction is considered to be prudent during the summer months when electricity demand is high.

Using the standards in 10 CFR 50.92, AmerGen has concluded that the proposed change does not constitute a significant hazard as described in the Enclosure 1 analysis performed in accordance with 10 CFR 50.91 (a)(1).

Pursuant to 10 CFR 51.22, AmerGen believes that an environmental review of this change is not required in accordance with the criteria of 10 CFR 51.22 (c)(9). The proposed change does not involve a significant hazard, pertains only to a component's surveillance frequency that does not effect the amount of effluents released offsite and does not result in an increase in individual or cumulative occupational radiation exposure.

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Pursuant to 10 CFR 50.91 (b)(1), also enclosed is the Certificate of Service for this request certifying service to the designated official of the State of New Jersey Bureau of Nuclear Engineering and the Mayor of Lacey Township, Ocean County, New Jersey.

This proposed change to the Technical Specifications has undergone a safety review in accordance with Section 6.5 of the Oyster Creek Technical Specifications.

Should you have any questions or require any additional information please contact Mr. George B. Rombold at 610-765-5516.

Very truly yours,



Ron J. DeGregorio
Vice President
Oyster Creek

Enclosures

c: H. J. Miller, Administrator, USNRC Region I
L. A. Dudes, USNRC Senior Resident Inspector, Oyster Creek
H. N. Pastis, USNRC Senior Project Manager, Oyster Creek
File No. 01036

United States of America
Nuclear Regulatory Commission

In the Matter of)
AmerGen Energy Company, LLC)

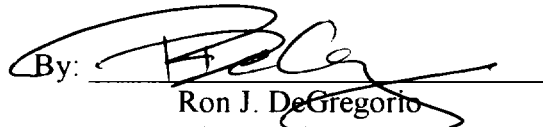
Docket No. 50-219

Certificate of Service

This is to certify that a copy of Technical Specification Change Request No. 286 for the Oyster Creek Generating Station Operating License, filed with the U.S. Nuclear Regulatory Commission on March 1, 2001 has this 1st day of March 2001, been served on the Mayor of Lacey Township, Ocean County, New Jersey, and the designated official of the State of New Jersey Bureau of Nuclear Engineering, by deposit in the United States mail, addressed as follows:

The Honorable Ronald Sterling
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

Mr. Kent Tosch, Director
Bureau of Nuclear Engineering
Department of Environmental Protection
CN 411
Trenton, NJ 08625

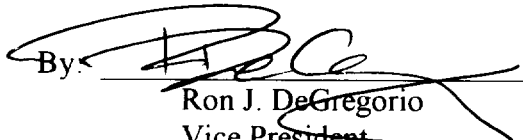
By: 
Ron J. DeGregorio
Vice President
Oyster Creek

Oyster Creek Generating Station

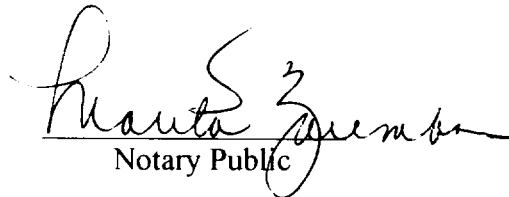
Facility Operating License
No. DPR-16

Technical Specification Change
Request No. 286
Docket No. 50-219

Applicant submits by this Technical Specification Change Request No. 286 to the Oyster Creek Generating Station Operating License a change to Specification 4.5.F.3.

By: 
Ron J. DeGregorio
Vice President
Oyster Creek

Sworn to and subscribed before me this 1st day of March 2001.


Notary Public

MARITA ZAREMBA
NOTARY PUBLIC OF NEW JERSEY
Commission Expires 5/31/2005

Enclosure 1

**Oyster Creek Generating Station
Technical Specification Change Request No. 286**

**Safety Evaluation
and
No Significant Hazards Determination**

I. Technical Specification Change Request No. 286

The purpose of this Technical Specification Change Request (TSCR) is to revise Oyster Creek Generating Station (OCGS) Technical Specification (TS) 4.5.F.3 to change the frequency of the quarterly full-stroke main steam isolation valve (MSIV) closure test. This request proposes that the full-stroke closure and isolation time test be performed during all cold shutdowns where the time between cold shutdowns is greater than 92 days.

AmerGen Energy Company, LLC (AmerGen) requests that the following change be made to the existing Appendix A Technical Specifications:

Revised Technical Specification Page: 4.5-3

The proposed change is indicated on a mark-up of Technical Specification page 4.5-3 in Enclosure 2.

II. Reason for Change

The change to the frequency of full-stroke testing the MSIVs conforms to ASME Section XI, Paragraph IWV-3412(a) requirements and will be revised from quarterly to cold shutdowns provided that the last test occurred more than 92 days before. The 92-day provision also ensures that valve full-stroke testing does not occur too frequently.

Part-stroke testing will be performed on a quarterly basis for reactor protection system instrument testing. This part-stroke testing will provide the appropriate indication of valve disk movement to assure valve operability during exercising as identified in ASME Section XI, Paragraph IWV-3412(b).

The ASME Code, Section XI, Paragraph IWV-3412(a) states: "Valves shall be exercised to the position required to fulfill their function unless such operation is not practical during plant operation. If only limited operation is practical during plant operation, the valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdown." Stroking the valves fully closed requires placing the plant in a transient condition by reducing power below 50% to preclude a scram from occurring when a valve is stroked. The duration of the necessary reduction in power is around 16 hours causing significant loss of generation capability and increased challenges to operators and plant equipment. It is proposed that part-stroke testing be performed during plant operation and full-stroke testing be performed during cold shutdowns. The acceptable Code alternative will adequately ensure valve operability.

III. Safety Evaluation Justifying Change

The proposed change involves the MSIVs and their purpose, which is to maintain reactor and containment isolation under transient and accident conditions. Since the change only modifies the frequency of the full-stroke closure test, other interfaced systems, such as the reactor protection system, containment isolation system, and electrical and pneumatic power to the MSIVs will not be affected.

The change will not adversely affect nuclear safety or safe plant operation. The change will eliminate the quarterly full closure test at power. The full closure test involves a power reduction that requires multiple operator actions and system perturbations over several hours. The proposed full closure test will be conducted during cold shutdowns.

Reactor protection system (RPS) quarterly testing requires exercising the MSIVs. Currently, this testing is performed with the MSIV full closure test at power. With the full closure test at power deleted, the RPS testing requires about a 10% closure of the MSIVs. The part-stroke test does not involve a power reduction, will be of brief duration and requires minimal operator action. MSIV controls include a slow-closing feature to allow part-stroke testing at power. A daily part-stroke test was performed at Oyster Creek until License Amendment No. 117 was issued by the NRC on June 29, 1990. As a result of MSIV test circuit design, past Oyster Creek experience, industry experience and careful preparation for performance of the quarterly part-stroke test, the potential for inadvertent MSIV closure due to this testing is minimal.

Oyster Creek is committed to performing in-service testing to the 1986 edition of the ASME Code, Section XI. The MSIVs are categorized as Category A valves per Paragraph IWV-2100. ASME Section XI, Paragraph IWV-3411 states: "Category A and B valves shall be exercised at least once every 3 months, except as provided by IWV-3412(a), IWV-3415, and IWV-3416." Paragraph IWV-3412(a) states: "Valves shall be exercised to the position required to fulfill their function unless such operation is not practical during plant operation. If only limited operation is practical during plant operation, the valve shall be part-stroke exercised during plant operation and full-stroke exercised during cold shutdown."

AmerGen will part-stroke the MSIVs quarterly to assure the valve disk moves as required by ASME Section XI, Paragraph IWV-3412(b). Part-stroking of the MSIVs will occur during the MSIV closure scram functional test performed in accordance with Technical Specification Table 4.1.1, Item 10. This test, which verifies the scram signal on MSIV closure ($\leq 10\%$), causes the valve to move sufficiently to provide assurance of full closure

capability. The quarterly MSIV closure test is required to assure operability of this input to the reactor protection system and is based on instrument reliability analysis as discussed in the bases of Technical Specification Section 4.1. Based on review of valve design parameters, discussion with the valve manufacturer and review of the MSIV limit switch calculation, the necessary demonstrated valve disk movement will occur if the scram signal is indicated. The valves will be full-stroke tested during each cold shutdown unless the test was performed within the previous 92 days.

Stroke time testing of the MSIVs is performed during each full closure test. Review of the historical data available for these tests since 1989 (both at power and during cold shutdowns) reveals that there has been no failure to meet the acceptance criteria of 3-10 seconds. No variation in closure times was identified due to plant conditions at the time of the test.

A survey of various BWR plants shows that none have a technical specification requirement to full-stroke test MSIVs at power. Additionally, there is no requirement in the Standard Technical Specifications (NUREG-1433) that requires full-stroke testing at power on a quarterly basis. The frequency of full-stroke testing the MSIVs in Standard Technical Specifications is either in accordance with the ASME code or 18 months (SR 3.6.1.3.8). The Standard Technical Specifications also require quarterly testing of the MSIV closure scram instrumentation (SR 3.3.1.1.9 as referenced from Table 3.3.1.1-1, Function No. 5) and is based on reliability analysis.

IV. No Significant Hazards Determination

In accordance with 10 CFR 50.91 the following provides an analysis that concludes no significant hazards are involved with the proposed change. The standards in 10 CFR 50.92 are used in this determination.

The proposed amendment does not:

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

The proposed change revises Technical Specification 4.5.F.3 to require MSIV full-stroke testing during each cold shutdown rather than quarterly at power. Since this change only affects the frequency of testing the isolation time of MSIVs, it does not impact the occurrence of accidents that the MSIVs are designed to mitigate. The 10% closure test that will be performed quarterly in

order to test the MSIV closure scram instrumentation has some potential of causing an inadvertent closure of the MSIV. The current test of MSIV closure scram instrumentation is conducted with the quarterly full closure test and is performed at reduced power. The closure of an MSIV at the reduced power level does not result in a plant trip. Inadvertent closure of MSIVs is a transient of moderate frequency evaluated in the updated FSAR. The small increase in potential for an MSIV full closure transient during the part-stroke test is offset by the decrease in potential transients due to the plant power manipulation necessary to perform the full closure test.

The proposed change affects the frequency of testing the MSIVs to ensure an acceptable level of reliability. Aligning the Oyster Creek test frequency for MSIVs with the ASME Code and industry practice assures adequate reliability for valve closure. Therefore, the MSIVs will be capable of closing to mitigate accidents.

As a result of the discussion above, the change to the frequency of MSIV full closure testing does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

There is no physical change in plant configuration associated with performing the MSIV full or partial closure tests. The MSIV closure scram is designed to anticipate the transient caused by valve closure with the plant in operation. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) Involve a significant reduction in a margin of safety.

The proposed change affects the method of assuring the reliability of the MSIVs. The change from a quarterly full-stroke closure test at power to full-stroke tests during cold shutdowns combined with quarterly part-stroke tests to ensure instrument function provides adequate means of assuring MSIV operability. The reliability of MSIVs to close within the required 3 – 10 seconds has been consistently demonstrated and it is expected that the valves will continue to pass this test when done on a cold shutdown basis. The quarterly 10% closure reactor

protection system testing will assure that the valves will respond to a closure signal.

Presently, the MSIVs are full-stroke closed quarterly at power in accordance with Technical Specification 4.5.F.3. The basis for the current quarterly full closure test at power and the proposed full closure test during cold shutdowns with part-stroking quarterly during instrument surveillance is consistent with the ASME Boiler and Pressure Vessel Code, Section XI. In addition, the proposed change is consistent with industry standard requirements contained in the Standard Technical Specifications, NUREG-1433, Revision 1. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Enclosure 2

**Oyster Creek Generating Station
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Technical Specification Page 4.5-3 Mark-up

the valve or its associated actuator by cycling the valve through at least one complete cycle of full travel and verifying the isolation time limit is met. Following maintenance, repair or replacement work on the control or power circuit for the valves, the affected component shall be tested to assure it will perform its intended function in the circuit.

- ~~each COLD SHUTDOWN~~
3. ~~Quarterly, during periods of sustained POWER OPERATION, each main steam isolation valve shall be closed (one at a time) and its closure time verified to be within the limits of Specification 4.5.F.1 above. Such testing shall be conducted with reactor power not greater than 50% of rated power.~~ *unless this test has been performed within the last 92 days*
4. Reactor Building to Suppression Chamber Vacuum Breakers
- a. The reactor building to suppression chamber vacuum breakers and associated instrumentation, including setpoint, shall be checked for proper operation every three months.
- b. During each REFUELING OUTAGE, each vacuum breaker shall be tested to determine that the force required to open the vacuum breaker from closed to fully open does not exceed the force specified in Specification 3.5.A.4.a. The air-operated vacuum breaker instrumentation shall be calibrated during each REFUELING OUTAGE.
5. Pressure Suppression Chamber - Drywell Vacuum Breakers
- a. Periodic OPERABILITY Tests
- Once every 3 months and following any release of energy which would tend to increase pressure to the suppression chamber, each OPERABLE suppression chamber - drywell vacuum breaker shall be exercised. Operation of position switches, indicators and alarms shall be verified every 3 months by operation of each OPERABLE vacuum breaker.
- b. REFUELING OUTAGE Tests
- (1) All suppression chamber - drywell vacuum breakers shall be tested to determine the force required to open each valve from fully closed to fully open.
- (2) The suppression chamber - drywell vacuum breaker position indication and alarm systems shall be calibrated and functionally tested.