



GPU Nuclear Corporation

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C321-94-2042
April 15, 1994

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219
Technical Specification Change Request (TSCR) No. 215 -
QA Audit Frequencies

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request (TSCR) No. 215.

Also enclosed is a Certificate of Service for this request certifying service to the chief executives of the township and county in which the facility is located, as well as the designated official of the State of New Jersey Bureau of Nuclear Engineering.

The purpose of this TSCR is to request the deletion of the audit program frequency requirements from Technical Specification 6.5.3 and to utilize the Operational Quality Assurance (OQA) Plan as the controlling document. This change will introduce more flexibility into audit scheduling to consider plant activities and performance. In addition, a minor editorial change has been incorporated into this TSCR correcting a reference in TS 6.5.1.14 in response to a finding in the Operational Safety Team Inspection report of December 23, 1993.

The OQA Plan is part of GPU Nuclear's Safety Analysis Report (SAR) and subject to the provisions of 10 CFR 50.54(a). A formal review of the changes was conducted considering the requirements of 10 CFR 50.54(a). The review concluded that measures being introduced enhance the overall program.

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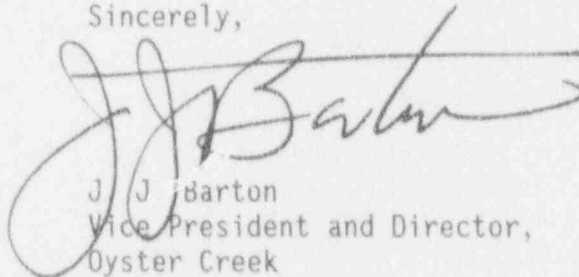
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However, in a quantitative sense, the changes represent a reduction in commitment. Therefore, the changes to the OQA Plan are being submitted with this TSCR for review and approval. The 10 CFR 50.54(a) analysis and the revised OQA Plan pages are attached. Furthermore, since the OQA Plan applies equally to Three Mile Island Nuclear Station, a TSCR to Operating License No. DPR-50 is being submitted concurrently. If the amendments are approved, GPU Nuclear will submit similar changes to the TMI Unit 2 Technical Specifications and the PDMS QA Plan.

GPU Nuclear considers this TSCR to be a Cost Beneficial Licensing Action (CBLA). It is estimated that implementation of this change could result in a savings of \$860,000 for the duration of the current license.

Pursuant to 10 CFR 50.91(a)(1), enclosed is an analysis applying the standards in 10 CFR 50.92 to make a determination of no significant hazards consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. J. Barton", is written over a horizontal line. The signature is fluid and cursive.

J. J. Barton
Vice President and Director,
Oyster Creek

JJB\DK\plp
Attachments

cc: Administrator, Region 1
Oyster Creek NRC Project Manager
Sr. Resident Inspector
TMI-1 Senior Project Manager