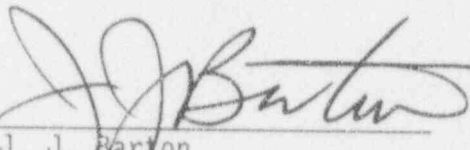


GPU NUCLEAR CORPORATION
OYSTER CREEK NUCLEAR GENERATING STATION

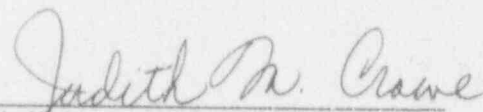
Facility Operating
License No. DPR-16

Technical Specification Change Request
Request No. 215
Docket No. 50-219

Applicant submits, by this Technical Specification Change Request No. 215 to the Oyster Creek Nuclear Generating Station Operating License, a change to pages 6-7, 6-7.

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

Sworn and Subscribed to before me this 15th day of April 1994.


A Notary Public of NJ

JUDITH M. CROWE
Notary Public of New Jersey
My Commission Expires 1/25/95

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
GPU Nuclear Corporation)

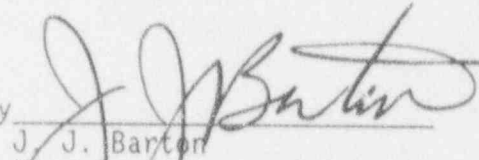
Docket No. 50-219

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 215 for Oyster Creek Nuclear Generating Station Operating License, filed with the U.S. Nuclear Regulatory Commission on April 15 1994 has this day of 4/15, 1994, been served on the Mayor of Lacey Township, Ocean County, New Jersey by deposit in the United States mail, addressed as follows:

The Honorable Louis A. Amato
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

By


J. J. Barton
Vice President and Director
Oyster Creek

I. Technical Specification Change Request (TSCR) No. 215

GPU Nuclear requests that the following changed replacement pages be inserted into existing Technical Specifications:

Delete the existing pages 6-5 and 6-7 and replace it with the attached revised pages 6-5 and 6-7.

II. Reasons for Change

Section 6.5.3 of the Technical Specifications contains the audit program requirements. Areas to be audited and audit frequencies are specified. Because these requirements are in the Technical Specifications, there is little flexibility to adjust the audit program to make the audits more meaningful. Audits are required to be performed regardless of activities in progress. For example, the audit of processing and packaging of radioactive waste is required when due even if minimal processing and packaging is being performed then and considerable processing and packaging will be performed the following month. Some activities are conducted only during refueling outages, so it is sensible to audit those activities during refueling outages rather than ongoing activities according to a non-flexible schedule. The Technical Specifications do not preclude adding an extra audit to cover an activity during a refueling outage, but it does prevent delaying an audit to either catch or avoid a refueling outage. Similarly, the limited flexibility can lead to auditing an activity prior to corrective action completion when the audit could have assessed the effectiveness of the corrective action if it were postponed a short time. Furthermore, the current audit program requirements can consume resources for auditing areas without problems which would be better used in monitoring and assessing weak areas or areas of decreasing performance before they become weak areas.

The proposed Technical Specification change deletes the audit program frequency requirements from the Technical Specifications and relocates them to the Operational Quality Assurance (OQA) Plan. In addition, the maximum interval for some audit frequencies are being increased. The change to the OQA Plan is being pursued concurrently.

This TSCR also includes a change in TS 6.5.1.14 correcting a reference to a standard. This change is being made to address a finding in the Operational Safety Team Inspection report of December 23, 1993.

III. Safety Evaluation Justifying Change

The proposed change concerns audit frequency requirements. A fixed, inflexible schedule of audit requirements is being replaced with a more flexible scheduling mechanism. The areas and activities to be audited and the scope of the audits performed are unaffected by this change. In lieu of a prescriptive, unchangeable

schedule, audits will be conducted within relatively flexible parameters based on the performance of the subject area. In this way resources can be focused on weak areas and areas of declining performance. Within these parameters, areas with consistently high performance can be audited less frequently.

The maximum interval between audits for four of the thirteen subject areas has been extended to twenty-four (24) months. In two other cases the maximum interval has been extended to thirty-six months. For those areas with a nominal twenty-four (24) month interval, a six month grace period will be introduced. No grace period will be permitted for those areas with a maximum interval of thirty-six (36) months. Each audit will consider the nonconformance and corrective action system in addition to the subject area audit that will be done on a twenty four (24) month basis. Furthermore, each subject area, regardless of interval, will be reviewed on an annual basis to determine when the next audit should be conducted. Recent performance as evidenced by any Notices of Violation (NOV), Licensee Event Report (LER), assessment results by independent groups, self assessment activities and deficiency trending data will be key factors in this review. These factors and others will constitute an assessment of the performance of each area to substantiate the projected audit schedule or determine the need to modify it. In this manner the overall quality of the audit program is enhanced.

There are several activities for which the audit frequency is mandated by regulation. For those activities GPU Nuclear will continue to meet the specified schedule unless a specific exemption is sought and granted.

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 the additional measures being introduced enhance the overall program. However, in a quantitative sense, the changes represent a reduction in commitment. Therefore, the revisions to the OQA Plan are being submitted to the NRC concurrently with this TSCR.

IV. No Significant Hazards Consideration

GPU Nuclear has determined that this TSCR poses no significant hazard as defined by the NRC in 10 CFR 50.92.

1. These changes do not affect the function of any system or component. Therefore, they do not increase the probability of occurrence or consequence of an accident previously evaluated in the SAR.
2. These changes do not involve a physical change to plant configuration and they do not affect the performance of any equipment. Therefore, they do not create the possibility of an accident or malfunction of a different type than previously identified.

3. The shifting of the audit frequency requirements from the Technical Specifications to the OQA Plan and the extension of the maximum interval between audits of certain areas do not change the activities to be audited nor the scope of individual audits. Furthermore, audit frequencies are not associated with the margin of safety in the bases of any Technical Specification. Therefore, the margin of safety is not affected by this change.

V. Implementation

It is requested that the amendment authorizing this change be effective 30 days after issuance to allow changes in procedures to be made.