

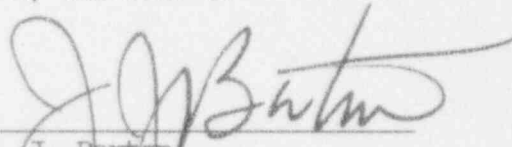
GPU NUCLEAR CORPORATION
OYSTER CREEK NUCLEAR GENERATING STATION

Facility Operating
License No. DPR-16

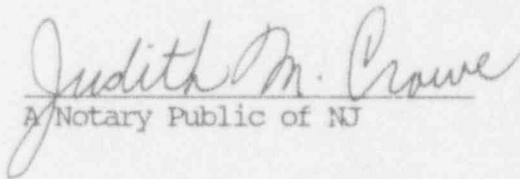
Technical Specification Change Request
Request No. 211
Docket No. 50-219

Applicant submits, by this Technical Specification Change Request No. 211 to the Oyster Creek Nuclear Generating Station Operating License, a change to pages 1.0-1, 3.2-3, 3.4-1, 3.4-4, 3.5-6, 3.5-7, 3.8-1, and 3.17-1.

BY


J. J. Barton
Vice President and Director
Oyster Creek

Sworn and Subscribed to before me this 18th day of October 1993.


A Notary Public of NJ

JUDITH M. CROWE
Notary Public of New Jersey
My Commission Expires 12/25/95

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
GPU Nuclear Corporation)

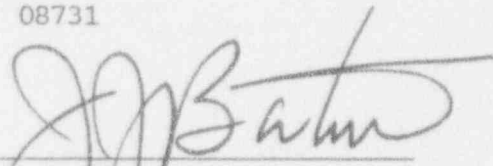
Docket No. 50-219

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 211 for Oyster Creek Nuclear Generating Station Operating License, filed with the U.S. Nuclear Regulatory Commission on October 18 1993 has this day of October 18, 1993, 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

OYSTER CREEK NUCLEAR GENERATING STATION
OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 211

Applicant hereby requests the Commission to change Facility Operating License No. DPR-16 as discussed below, and pursuant to 10 CFR 50.91, an analysis concerning the determination of no significant hazards consideration is also presented:

1.0 SECTIONS TO BE CHANGED

- 1.1 Definitions
- 3.2C Standby Liquid Control System
- 3.4A Core Spray System
- 3.4B Automatic Depressurization System
- 3.4C Containment Spray System and Emergency Service Water System
- 3.5B Secondary Containment
- 3.8 Isolation Condenser
- 3.17 Control Room Heating, Ventilating, and Air-conditioning System

2.0 EXTENT OF CHANGE

For the systems identified in Section 1.0, this Technical Specification Change Request would give the option of verifying operability during a Limiting Condition of Operation by the examination of surveillance records. This change does not preclude testing as the means of determining operability.

3.0 CHANGES REQUESTED

As delineated on the attached revised Technical Specification pages 1.0-1, 3.2-3, 3.4-1, 3.4-4, 3.5-6, 3.5-7, 3.8-1, and 3.17-1.

4.0 DISCUSSIONS

The requirement to demonstrate operability, by daily testing, of a redundant system (component) when a system (component) is declared inoperable was a typical TS requirement when Oyster Creek was granted its Provisional Operating License. These redundant system (component) testing requirements were designed to be conservative at a time when there was a lack of plant operating history and an insufficient equipment failure data base to justify other testing frequencies.

This change proposes the option of verifying system (component) operability in lieu of daily testing as now required by the systems' Limiting Condition for Operation (LCO). This option would decrease the probability of equipment failure because the daily testing contributes to unnecessary component wear and challenges to the

safety related systems.

Daily testing of redundant systems (components) is not required in the NRC's Standard Technical Specifications nor in recently issued BWR Technical Specifications. The NRC staff deleted these testing requirements since the added assurance provided by such testing is not sufficient to justify the loss of safety function during the test, provided the periodic surveillance testing is current and that there are no known reasons to suggest that the redundant system (component) is inoperable.

The proposed deletion of multiple system (component) testing will conform Oyster Creek to current BWR plant operating practices. Since verification will not change the probability of accident precursors, this proposed amendment will not affect the probability of an accident previously evaluated. This change will not involve a significant increase in the consequences of an accident previously evaluated because normal surveillance testing ensures the operability for the systems identified in Section 1.0 is maintained.

This proposed change would not introduce any new modes of operation which could create a new or different kind of accident. Verifying operability would only delete excessive system or component testing. Therefore, the proposed change would not create any new types of equipment failure that could cause a new or different kind of accident.

The proposed change will not reduce the functional capability of the equipment required for safe operation of Oyster Creek. The surveillances will provide adequate assurance of system performance. The reduction in testing during an LCO will decrease the probability of equipment failure and human error. Therefore, verification of operability does not represent a significant reduction in a margin of safety.

5.0 DETERMINATION

GPU Nuclear has determined that operation of the Oyster Creek Nuclear Generating Station in accordance with the proposed Technical Specifications does not involve a significant hazard. The changes do not:

1. Involve a significant increase in the probability or the consequence of an accident previously evaluated.

The change provides an alternate means of determining system (component) operability without testing. Since a recent surveillance will provide the evidence for determining operability, the verification will be equivalent to the demonstration or testing of the redundant system (component). Since the redundant system (component) can perform its design function, this change will not increase the probability or consequence of an accident previously evaluated.

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

Operation of the facility in accordance with this proposed change will not create the possibility for an accident or malfunction of a different type from any accident previously evaluated. The proposed amendment does not modify any system (component) operation or maintenance activity. The facility will continue to be operated within the limits of existing accident analysis and margins of safety.

3. Involve a significant reduction in a margin of safety.

This change permits an administrative check (verify) in place of daily testing (demonstrating) to determine operability during a LCO. Since the proposed change does not alter any system hardware or design basis, the margin of safety is not reduced.

6.0 IMPLEMENTATION

We request that the amendment authorizing this change become effective 60 days after issuance.