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April 24, 1991

C321-91-2060

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)  
Docket No. 50-219  
License No. DPR-16  
Containment High Range Radiation Monitors - Alternative  
Monitoring

Reference: (1) NRC Letter, March 31, 1987, "Oyster Creek Nuclear  
Generating Station - Containment High Range Radiation  
Monitors (TSCR 152, TAC 64381 and 64015)."

The Reference (1) letter provided approval of Amendment No. 116 to Provisional Operating License No. DPR-16 for the Oyster Creek Nuclear Generating Station. The Safety Evaluation, sections 2.1 and 2.3, enclosed with the Reference (1) letter requested a technical specification be proposed for a preplanned alternative method of monitoring containment radiation to be initiated if both containment high range radiation monitors are inoperable for more than 7 days or to provide justification for not needing this technical specification for Oyster Creek.

GPU Nuclear has evaluated existing plant features and procedures, and concluded that based on the following justification an additional preplanned method of monitoring containment radiation is not warranted.

The containment high range radiation monitors are redundant and therefore can tolerate single failure. Currently, the containment high range radiation monitors function to observe release of radioactive materials into the drywell during and following an accident. During and following an accident, any exhaust through the main stack would be monitored by the high range RAGEMS noble gas monitor (Technical Specification 3.13.G.3). In addition, the existing Oyster Creek Nuclear Generating Station post-accident sampling and analysis procedure for the PASS addresses isotopic analyses of iodine and particulate cartridges for drywell dome and ring header samples.

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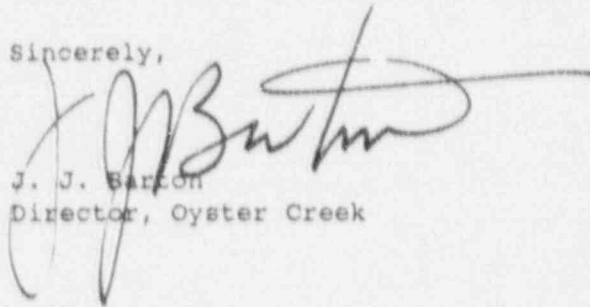
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In summary, independent plant features currently exist to replace the functions of the containment high range radiation monitors in the unlikely event of both high range monitors being inoperable for more than 7 days.

If you have any questions on this submittal, please contact Mr. Michael W. Laggart, Manager, Corporate Nuclear Licensing at (201)316-7968.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. J. Barton", is written over the typed name and title.

J. J. Barton  
Director, Oyster Creek

JJB/RZ/plp

cc: Administrator, Region I  
Senior NRC Resident Inspector  
Oyster Creek Project Manager