

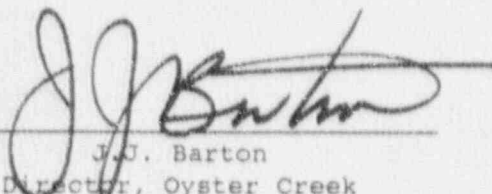
GPU NUCLEAR CORPORATION  
OYSTER CREEK NUCLEAR GENERATING STATION

PROVISIONAL OPERATING  
LICENSE NO. DPR-16

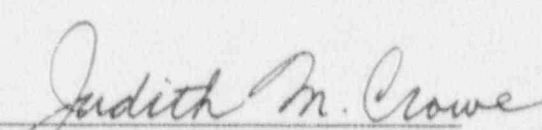
Technical Specification  
Change Request No. 197  
Docket No. 50-219

Applicant submits, by this Technical Specification Change Request No. 197,  
to the Oyster Creek Nuclear Generating Station Technical Specifications, a  
change to pages 4.15-4, 4.15-5.

By: \_\_\_\_\_

  
J.J. Barton  
Director, Oyster Creek

Sworn and subscribed to before me this 25th day of April 1991.

  
NOTARY PUBLIC OF NEW JERSEY

JUDITH M. CROWE  
Notary Public of New Jersey  
My Commission Expires 12/5/95

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

Applicant hereby requests the Commission to change Appendix A to the above captioned license as indicated below. Pursuant to 10CFR50.91, an analysis concerning the determination of no significant hazards considerations is also presented:

1. Sections to be Changed

4.15

2. Extent of Change

Modify Channel Functional Test requirements for the Main Stack Monitoring System (Stack RAGEMS) and Turbine Building Ventilation Monitoring System (Turbine RAGEMS) radioactive noble gas monitors currently existing in the Technical Specifications. These two (2) systems are installed to comply with NUREG 0737, Section II.F.1, Items 1 and 2 to address the equipment which was installed prior to Operating Cycle 12.

3. Changes Requested

These changes are indicated on the attached revised Technical Specification Table 4.15.2 and Table 4.15.2 Notations.

4. Discussions

NUREG 0737, Section II.F.1., Items 1 and 2 require each nuclear generating station to have the capability to detect and measure concentrations of radioactive noble gas fission products from the plant's gaseous effluent releases during and following an accident.

Two Radioactive Gaseous Effluent Monitoring Systems (RAGEMS) have recently been fully placed into service at Oyster Creek to perform this function; one to monitor releases at the Main Stack (RAGEMS I) and the other to monitor the Turbine Building vents (RAGEMS II). Both of these monitoring systems are comprised of new state-of-the-art equipment for the radioactive noble gas monitors, which are housed in their own racks.

The noble gas monitors in RAGEMS I contain many vernier devices allowing for periodic instrument adjustments used to maintain that instrument within acceptable limits throughout its life. This new instrument with its vernier devices allows for much greater accuracy and flexibility for its specific functions, i.e. measuring, counting, amplification, etc, throughout the instrument's life.

Upon fully placing the RAGEMS I system into service prior to Oyster Creek's Operating Cycle 12, the positions of these vernier devices were approximated. Approximately one (1) year was required with the systems in operation for their proper positions to be established during various modes of plant operation. Prior to placing RAGEMS I into service, covers were installed over the instrument racks with alarms to the Control Room when the covers were opened. GPU Nuclear Administrative Procedures controlled the various switch positions of the instrument while data was collected on precise vernier positions. This is the operating procedure currently used.

However, the increased complexity of the RAGEMS I system with this ability to change/finely adjust switch positions does not lend itself to the simplistic operate/test conditions utilized by the previous system. The replaced system utilized more simplistic snap action switches. Therefore, the existing Technical Specification (note "e.3") is no longer appropriate for the new upgraded RAGEMS I system.

GPU Nuclear is proposing to add a new notation "h" in Table 4.15.2 for the radioactive noble gas monitor in RAGEMS I. Currently in the RAGEMS I System, alarms for measured levels above alarm setpoint and low countrate/monitor failure are hardwired to the control room. A more specific Channel Functional Test Item which shall verify Control Room annunciation of the switch cover alarms after the face plate switches are verified in their correct positions is being requested as item h.3.

In the RAGEMS II system, each mode of operation is controlled by an Allen-Bradley Programmable Controller which provides a Control Room trouble alarm via computer for measured levels above alarm setpoint, and low countrate/monitor failure. GPU Nuclear is proposing to add a new notation "i" in Table 4.15.1 for the noble gas monitor in RAGEMS II, which addresses testing necessary to demonstrate RAGEMS II functional capability.

Both RAGEMS systems' alarms continue to be checked during each Channel Functional Test per the Technical Specifications.

## 5. 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 hazards consideration. The changes do not:

- A. Involve a significant increase in the probability or the consequences of an accident previously evaluated. The radioactive noble gas monitors are installed to provide the plant operators with information on noble gas effluent releases during and following an accident as required by NUREG 0737, Section II.F.1, Items 1 and 2. This modification to the specifications of this accident monitoring equipment does not affect plant operations during normal operating conditions, and thus does not involve an increase in the probability of an accident, and thus does not involve an increase in the consequences of an accident previously evaluated.

Upon fully placing the RAGEMS I system into service prior to Oyster Creek's Operating Cycle 12, the positions of these vernier devices were approximated. Approximately one (1) year was required with the systems in operation for their proper positions to be established during various modes of plant operation. Prior to placing RAGEMS I into service, covers were installed over the instrument racks with alarms to the Control Room when the covers were opened. GPU Nuclear Administrative Procedures controlled the various switch positions of the instrument while data was collected on precise vernier positions. This is the operating procedure currently used.

However, the increased complexity of the RAGEMS I system with this ability to change/finely adjust switch positions does not lend itself to the simplistic operate/test conditions utilized by the previous system. The replaced system utilized more simplistic snap action switches. Therefore, the existing Technical Specification (note "e.3") is no longer appropriate for the new upgraded RAGEMS I system.

GPU Nuclear is proposing to add a new notation "h" in Table 4.15.2 for the radioactive noble gas monitor in RAGEMS I. Currently in the RAGEMS I System, alarms for measured levels above alarm setpoint and low countrate/monitor failure are hardwired to the control room. A more specific Channel Functional Test Item which shall verify Control Room annunciation of the switch cover alarms after the face plate switches are verified in their correct positions is being requested as item h.3.

In the RAGEMS II system, each mode of operation is controlled by an Allen-Bradley Programmable Controller which provides a Control Room trouble alarm via computer for measured levels above alarm setpoint, and low countrate/monitor failure. GPU Nuclear is proposing to add a new notation "i" in Table 4.15.1 for the noble gas monitor in RAGEMS II, which addresses testing necessary to demonstrate RAGEMS II functional capability.

Both RAGEMS systems' alarms continue to be checked during each Channel Functional Test per the Technical Specifications.

## 5. 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 hazards consideration. The changes do not:

- A. Involve a significant increase in the probability or the consequences of an accident previously evaluated. The radioactive noble gas monitors are installed to provide the plant operators with information on noble gas effluent releases during and following an accident as required by NUREG 0737, Section II.F.1, Items 1 and 2. This modification to the specifications of this accident monitoring equipment does not affect plant operations during normal operating conditions, and thus does not involve an increase in the probability of an accident, and thus does not involve an increase in the consequences of an accident previously evaluated.

- B. Create the possibility of a new or different kind of accident from any previously evaluated. The RAGEMS systems do not interface with any nuclear plant systems, and thus cannot initiate a new or different type of accident.
- C. Involve a significant reduction in a margin of safety. The proposed changes shall provide assurance that the operability of the radioactive noble gas monitors and associated electronics will be maintained within acceptable limits. Therefore this change does not reduce the margin of safety.