



GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

C321-91-2126
April 29, 1991

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Technical Specification Change Request No. 170

Pursuant to 10 CFR 50.90, GPU Nuclear Corporation, operator of the Oyster Creek Nuclear Generating Station (OCNGS), Provisional Operating License No. DPR-16, requests a change to Appendix A of that license.

The attached Technical Specification Change Request proposes to delete the requirement of Section 3.15.A, Table 3.15.1, that a liquid effluent radiation monitor be available during liquid effluent discharges from the radwaste processing facilities. This change will recognize the primary method of monitoring batch liquid effluent releases from the radwaste facility as the method of double sampling and independent verification of release rates and proper valve alignment. This method is the current provision of Table 3.15.1, Action 110, when the liquid effluent monitor is inoperable.

The existing monitor and associated hardware are incapable of meeting the operability requirements of Section 3.15.A and have been out of service since 1981. OCNGS has released liquid effluent from the radwaste processing facilities in compliance with the alternate provision. Our intent to eliminate the radiation monitor requirement was previously conveyed in GPUN letter (Fiedler, GPUN to Zwolinski, NRC) dated August 13, 1986. Repairs or replacements to the existing hardware could only be accomplished at significant expense. Our assessment concluded that this expense is unjustified based on past liquid release performance and through a cost/benefit evaluation.

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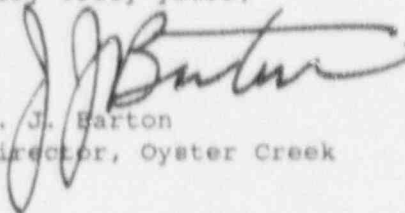
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We consider this request to be of moderate priority since liquid effluent releases are currently permitted with an inoperable monitor. If approved, we would be prepared to implement the changes upon issuance of the license amendment.

This change request has been reviewed in accordance with Section 6.5 of the OCNCS Technical Specifications, and using the standards in 10 CFR 50.92 we have concluded that these proposed changes do not constitute a significant hazards consideration.

Pursuant to 10 CFR 50.91 (b) (1), a copy of this change request has been sent to the State of New Jersey Department of Environmental Protection.

Very truly yours,



J. J. Barton
Director, Oyster Creek

JJB/PC/amk

Attachment

cc: Administrator, Region I

NRC Resident Inspector

Mr. Alex Dromerick, NRC Project Manager

TSCR170