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October 10, 1991

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Facility Operating License No. DPR-16
Docket No. 50-219
Containment Vent and Purge Isolation Valves

Reference: (1) NRC letter, October 10, 1986, "Containment Purge and Vent Isolation Valves (MPA B-24, TAC 59828)."

With respect to your letter of October 10, 1986, the amount of containment atmosphere that would be released through the vent and purge isolation valves before their closure, subsequent to a LOCA, has been conservatively determined to be approximately 425 lbm. The calculated release through valves V-28-17 and V-28-18 (whose closing times exceed 15 seconds) is 32 lbm and represents less than 10% of the total calculated release through all vent and purge isolation valves. The Staff's safety evaluation of January 21, 1986 concluded that the site boundary dose was acceptable assuming a containment atmosphere release of 2000 lbm for the vent and purge isolation valves. Because the actual containment atmosphere released is less than that assumed in the Staff's safety evaluation, closure times greater than 15 seconds for valves V-28-17 and V-28-18 are justified since acceptable site boundary doses are not exceeded.

The Staff requested Technical Specification changes imposing additional leakage testing of containment vent and purge valves with resilient seals because of concerns with seal deterioration attributed to harsh environments and frequent valve use. GPUN has determined that additional testing is not necessary. The valves are located in environments which are within the manufacturers' temperature and radiation limits and, in addition, the resilient seals are replaced in accordance with the manufacturer's recommendations. Seal wear due to frequent use is not a concern. Valves V-27-1 through 4; V-23-13 through 16 and V-28-17 and 18 are normally closed. They are only operated in the 24 hour period preceeding a shutdown, up to 24 hours following a startup, when a leak test is performed and for drywell entries. They may also be operated in accordance with procedures following accident conditions. V-28-18 is full stroke exercised for operability every 3 months.

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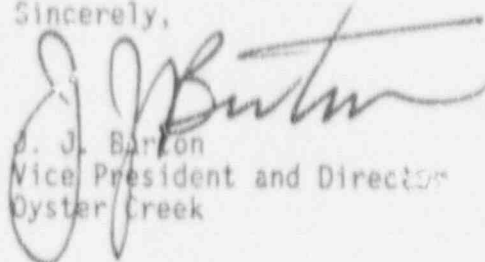
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With respect to including valve closure time in the Technical Specifications, GPUN believes it is inappropriate to include the containment vent and purge valve closure times in the OCNGS Technical Specifications. The information is contained in the FSAR. Inclusion in the Technical Specifications would not enhance the clarity of the existing document. This is consistent with industry efforts to improve plant Technical Specifications.

Sincerely,



J. J. Barton
Vice President and Director
Oyster Creek

JJB/RTZ/plp

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