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Writer's Direct Dial Number:

February 8, 1984

Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Crutchfield:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Technical Specification Change Request No. 108

This letter transmits the information requested by members of your staff during recent telephone conversations with Mr. James Knubel of my staff regarding a revision to 10CFR50.91, significant hazards analysis, of the subject Technical Specification Change Request.

If you have any questions regarding this information, please call Mr. James Knubel at (201) 299-2264.

Very truly yours,

P. B. Fiedler
Vice President and Director
Oyster Creek

1r/0127e

cc: Administrator
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OYSTER CREEK NUCLEAR GENERATING STATION
PROVISIONAL OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 108

Pursuant to 10CFR50.91, an analysis concerning significant hazards considerations is provided below:

1. Section to be changed:

3.1 Bases and Table 3.1.1

2. Extent of changes:

a. Section 3.1 Protective Instrumentation

The bases are being revised to reflect the increase in the high drywell pressure trip setpoint from 2.0 psig to 2.4 psig.

b. Table 3.1.1 Protective Instrumentation Requirements

The table is being revised to reflect the increase in the high drywell pressure trip setpoint as it relates to the plant protection functions.

3. Discussion:

Section 3.1 and Table 3.1.1 cites the requirements for the plant protective instrumentation. The purpose of this Technical Specification Change Request is to revise this section and table to reflect an increase in the high drywell pressure trip setpoint from 2.0 psig to 2.4 psig.

4. Determination:

We have determined that although the proposed amendment involves a slight increase in the established trip setting which initiates automatic protective actions, it does not involve a change of any of the limiting safety system settings listed in Section 2.3 of the Technical Specifications. This change will increase the separation between the containment operating pressure and the pressure trip setpoint. This reduces the likelihood of spurious trips and will insure that only valid signals will challenge the trip system. However, the setpoint is still low enough that the trips initiated by the affected instruments will occur in time to ensure that they will perform their protective function.

Therefore, this change is found to involve no significant hazards considerations because although this change may slightly reduce in some way a safety margin, the results of this change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan. This change results from the application of a refinement of a previously used calculation model or design method.

In addition, the decrease in the likelihood of spurious trips will significantly reduce the possibility of plant disruptions or transients which lead to more significant events.

Based on the above, operation of the Oyster Creek Nuclear Generating Station in accordance with Technical Specification Change Request No. 108 would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.