

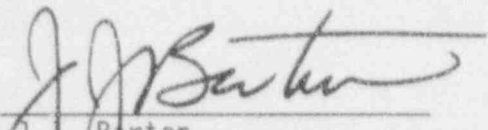
GPU NUCLEAR CORPORATION
OYSTER CREEK NUCLEAR GENERATING STATION

Facility Operating
License No. DPR-16

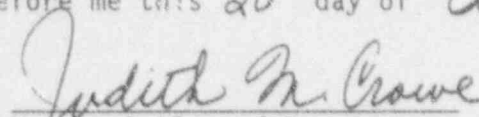
Technical Specification Change Request No. 193
Docket No. 50-219

Applicant submits, by this Technical Specification Change Request No. 193 to the Oyster Creek Nuclear Generating Station Technical Specifications, a change to pages i, ii, 1.0-5, 3.12-1, 3.12-2, 4.12-1, 4.12-2, 6-2, 6-3, 6-4, 6-7, and 6-13.

By:


J. V. Barton
Vice President and Director
Oyster Creek

Sworn and Subscribed to before me this 20th day of April 1992.


Notary Public of New Jersey

JUDITH M. CROWE
Notary Public of New Jersey
My Commission Expires 1/25/95

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
GPU NUCLEAR CORPORATION

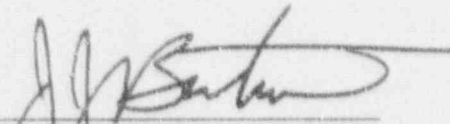
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CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 193 for the Oyster Creek Nuclear Generating Station Technical Specifications, filed with the U.S. Nuclear Regulatory Commission on April 20, 1992, has this day of April 20, 1992, been served on the Mayor of Lacey Township, Ocean County, New Jersey by deposit in the United States mail, addressed as follows:

Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

By: _____


J. J. Barton
Vice President and Director
Oyster Creek

OYSTER CREEK NUCLEAR GENERATING STATION
FACILITY OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219

TECHNICAL SPECIFICATION CHANGE REQUEST NO. 193

The licensee, GPU Nuclear Corporation, hereby requests the Commission to change Appendix A to the license for the Oyster Creek Nuclear Generating Station as described below. Pursuant to 10 CFR 50.91, an analysis concerning the determination of no significant hazards considerations is also presented:

I. Sections to be Changed

Table of Contents Section 1, Technical Specifications Sections 1, 3.12, 4.12, 6.2, 6.4, 6.5, 6.8 and 6.9.

II. Extent of Changes

First, the NRC approved Fire Protection Program (FPP) was incorporated into Oyster Creek's Final Safety Analysis Report as requested by NRC Generic Letter 86-10.

Second, the operability and surveillance requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements as defined in the current Technical Specifications (TS) were incorporated into the FPP.

Third, the standard fire protection license condition as described in Generic Letter 86-10 was incorporated into the operating license when the Full Term Operating License (FTOL) was issued for Oyster Creek.

Finally, we are requesting a change to the fire protection TS in accordance with NRC Generic Letter 88-12 to delete the operability and surveillance requirements and fire brigade staffing requirements that are now included in the FPP. This last step will complete the actions necessary to comply with the recommendations of Generic Letters 86-10 and 88-12.

We are also requesting four minor administrative changes to the remaining fire protection TS, as discussed below.

III. Changes Requested

The changes requested are indicated on the attached revised TS pages i, ii, 1.0-5, 3.12-1, 3.12-2, 4.12-1, 4.12-2, 6-2, 6-3, 6-7, 6-10 and 6-13.

IV. Discussion

NRC Generic Letter 86-10, "Implementation of Fire Protection Requirements", requested that licensees incorporate the NRC approved FPP in their Final Safety Analysis Reports (FSAR). In this manner, the FPP, including the systems, the administrative and technical controls, the

organization, and other plant features associated with fire protection would be on a consistent status with other plant features described in the FSAR. Generic Letter 86-10 encouraged licensees, upon completion of this effort, to apply for an amendment to their operating license (1) to replace current license conditions regarding fire protection with a new standard condition and (2) to remove unnecessary fire protection TS. The purpose of the standard license condition, which requires compliance with the provisions of the FPP as described in the FSAR, is to ensure uniform enforcement of fire protection requirements.

GPUN has incorporated the FPP into the Updated FSAR and the standard fire protection license condition was incorporated into the license when the FTOL was issued for Oyster Creek. Accordingly, we are now applying for an amendment to remove the unnecessary fire protection TS.

This change request is in accordance with NRC Generic Letter 88-12, "Removal of Fire Protection Requirements From Technical Specifications", which provides guidance for the relocation of fire protection requirements from the TS to the FPP. This change removes fire protection requirements from the TS in four major areas: fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The existing administrative control requirements related to fire protection audits and all requirements for alternate shutdown monitoring instrumentation are retained in the TS. The administrative controls proposed for the FPP are consistent with the administrative controls for the Emergency and Security Plans.

The standard fire protection license condition precludes changes to the NRC approved FPP without prior NRC approval if those changes would adversely affect the ability to achieve and maintain safe shutdown conditions in the event of a fire. According to Generic Letter 86-10, GPUN may alter specific features of the approved FPP provided such changes do not otherwise involve a change in a license condition or TS or result in an unreviewed safety question as defined in 10 CFR 50.59. Further, temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented.

The special reporting requirements in the current fire protection TS are being eliminated with this change. Any future deficiencies in the FPP would be reported in accordance with 10 CFR 50.72 and 10 CFR 50.73. This is in accordance with the guidance in Generic Letter 86-10. Other conditions which represent deficiencies in the FPP and are not encompassed by the above reporting criteria will be evaluated to determine appropriate corrective action.

In addition to the changes requested in accordance with Generic Letter 88-12, GPUN is also requesting additional administrative changes to the fire protection TS. These changes, which do not reduce the effectiveness of the fire protection TS, are described below.

- A. TS 6.5.3.2.a currently states, "An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm". GPUN requests the word "offsite" be deleted from the TS.

Limiting the inspection and audit team members to qualified "offsite" personnel is overly restrictive and is not necessary to ensure independence of the audit team. It prohibits the use of qualified, independent personnel who are located onsite.

The purpose of the annual audit, as stated in NRC Generic Letter 82-21, Enclosure 1, is to assess the plant fire protection equipment and program implementation in depth to verify continued compliance with NRC requirements, the SAR commitments, and the license conditions. The generic letter further states that the annual audits may be performed by qualified utility personnel who are not directly responsible for the site FPP or by an outside independent fire protection consultant. The Standard Technical Specifications specify offsite licensee personnel, however there is no requirement in the generic letter that the audit team be comprised of offsite personnel. Enclosure 1 of the generic letter supports an annual audit team comprised of personnel not responsible for the subject being audited.

GPUN procedures ensure the independence and effectiveness of the audit team by specifying that the audit team composition include:

1. A lead auditor from our QA organization,
2. A fire protection engineer who is not directly responsible for the FPP at the site being audited and,
3. An engineer not directly responsible for the subject under audit (knowledgeable in safety systems, operating procedures, and emergency procedures).

Thus the independence of the audit team is established without restricting members to those stationed offsite, and a comprehensive and conscientious audit program as described in Generic Letter 82-21 can be performed utilizing members located either offsite or onsite. The annual audit will continue to satisfy the overall programmatic requirements contained in 10 CFR 50.48(a) and the guideline positions in BTP 9.5-1. Based on the above procedural controls defining the composition of the audit team, this change will not reduce the quality or effectiveness of the annual audit.

- B. GPUN requests TS Table 3.12-6 (which would become Table 3.12-1), "Alternate Shutdown Monitoring Instrumentation", be revised to identify "Rx 23", near V-15-30" as the readout location for control rod drive system flow.

Safe shutdown in the event of a fire in the control room requires alternate shutdown which utilizes the control rod drive (CRD) system bypass line for reactor water makeup. This includes manual operation of valve V-15-30 in the CRD bypass line. Since CRD flow monitoring in the control room is considered damaged by the fire, the alternate shutdown method relies on local flow indication to monitor CRD system performance. The local flow indication at reactor building elevation 51', below instrument rack RK02 was utilized for this purpose which is remote from valve V-15-30 (elevation 23') and required an operator at the valve, an operator at the flow indicator, and intercommunication.

A new flow indicator was installed and located to be easily read from valve V-15-30. The new flow indicator allows the operator at valve V-15-30 to be aware of flow indication without support from an additional operator. This change reduces the burden on plant operators during alternate shutdown in the event of a fire.

The existing surveillance requirements of TS 4.12.I which apply to the alternate shutdown monitoring instrumentation will ensure the new flow indicator is capable of performing it's intended function.

- C. GPUN requests TS Tables 3.12-6 (which would become Table 3.12-1) and 4.12-1 be revised to delete the operability and surveillance requirement for the condensate transfer pump discharge pressure indicator.

This change will make the TS consistent with the current revision of the Five Hazards Analysis Report. The alternate shutdown path relies on the "B" isolation condenser (IC-B) to remove decay heat from the reactor. Makeup water to the shell side of IC-B can be supplied by either the condensate transfer or fire water systems. IC-B shell water level is used to monitor operation of both makeup systems and is sufficient for this purpose. The condensate transfer pump discharge pressure indicator (PI-21) is no longer used. The IC-B shell water level indicator is located on the remote shutdown panel and is already included in TS Tables 3.12-6 (which would become Table 3.12-1) and 4.12-1.

- D. TS Table 3.12-6 (which would become Table 3.12-1) incorrectly identifies instrument rack "PK05" as the readout location for shutdown cooling system flow. This flow can only be read locally on the 51' elevation of the reactor building near the reactor building closed cooling water heat exchangers. Accordingly, GPUN requests TS Table 3.12-6 (Table 3.12-1) be revised to identify "Local" as the readout location for this parameter.

V. Determination

GPUN has determined that operation of the Oyster Creek Nuclear Generating Station in accordance with the proposed TS does not involve a significant hazards consideration as defined in 10 CFR 50.92.

A. The proposed changes to the TS do not involve a significant increase in the probability or consequences of an accident previously evaluated.

1. The proposed changes to the TS made in accordance with Generic Letter 88-12 do not alter GPUN's existing commitments on fire protection. These existing commitments have been reviewed and approved by the NRC. The probability and consequences of accidents has been evaluated for the existing approved FPP in NRC Safety Evaluation dated March 3, 1978 and supplements thereto.

License condition 2.C(3) requires any changes made to the FPP be evaluated under the provisions of 10 CFR 50.59 and allows only those changes that would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

2. The proposed change to TS 6.5.3.2.a does not effect previously evaluated accidents. Based on existing procedural controls which define the composition of the audit team, this change does not reduce the quality or effectiveness of the annual audit. The annual audit will continue to adequately assess plant fire protection equipment and program implementation.
3. The proposed change to TS tables 3.12-6 and 4.12-1 to reflect the installation of a new flow indicator for CRD system flow does not effect previously evaluated accidents. The use of the new flow indicator in the event of a fire does not alter the previous considerations.
4. The proposed change to TS tables 3.12-6 and 4.12-1 to delete the operability and surveillance requirement for the condensate transfer pump discharge pressure indicator does not effect previously evaluated accidents. The Appendix R strategy will not be affected since an existing Appendix R component is used to determine the operability of IC shell side water makeup systems.
5. The proposed change to TS table 3.12-6 to correct the readout location for shutdown cooling system flow is an administrative change only and does not effect previously evaluated accidents.

- B. The proposed changes to the TS do not create the possibility of a new or different kind of accident from any accident previously evaluated.
1. The proposed changes to the TS made in accordance with Generic Letter 88-12 do not alter GPUN's existing previous evaluations of possible accidents. Further, license condition 2.C(3) requires that any changes to the FPP be evaluated via the 50.59 process to determine if the possibility of a new or different kind of accident would be created.
 2. The proposed change to TS 6.5.3.2.a removes the requirement that offsite personnel shall be used to perform the annual fire protection and loss prevention program inspection and audit, and is unrelated to the possibility of creating a new or different kind of accident.
 3. The proposed change to TS tables 3.12-6 and 4.12-1 to reflect the installation of a new flow indicator for CRD system flow does not create the possibility of a new or different kind of accident. The use of the new flow indicator in the event of a fire does not alter the previous evaluation.
 4. The proposed change to TS tables 3.12-6 and 4.12-1 to delete the operability and surveillance requirement for the condensate transfer pump discharge pressure indicator does not create the possibility of an accident or malfunction of a type different from any previously identified since it's Appendix R function is performed by another existing Appendix R component.
 5. The proposed change to TS table 3.12-6 to correct the readout location for shutdown cooling system flow is an administrative change only and does not create the possibility of a new or different kind of accident.
- C. The proposed changes to the TS do not involve a significant reduction in a margin of safety.
1. The proposed changes to the TS made in accordance with Generic Letter 98-12 will maintain the existing margin of safety by transfer of the FPP provisions from the TS to the FSAR. Since the provisions of 10 CFR 50.59 allow for evaluation of any reduction in the margin of safety and allow for changes to the FPP without prior NRC approval after 50.59 evaluation, the proposed changes will not involve a reduction in a margin of safety.

2. The proposed change to TS 6.5.3.2.a does not reduce the quality or effectiveness of the annual audit. Therefore there is no reduction in a margin of safety.
3. The proposed change to TS tables 3.12-6 and 4.12-1 to reflect the installation of a new flow indicator for CRD system flow does not reduce any margin of safety. The new flow indicator enhances the operator's ability to monitor CRD system flow during a fire and was installed for this purpose.
4. The proposed change to TS tables 3.12-6 and 4.12-1 to delete the operability and surveillance requirement for the condensate transfer pump discharge pressure indicator does not reduce any margin of safety. Existing Appendix instrumentation will be used to determine the operability of IC shell side water makeup systems during a fire.
5. The proposed change to TS table 3.12-6 to correct the readout location for shutdown cooling system flow is an administrative change only and does not reduce any margin of safety.