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February 22, 1996
C321-96-2047

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219
Technical Specification Change Request (TSCR) No. 230
Delete Emergency Diesel Generator (EDG) Inspection Requirement and
Modify Allowed Outage Time (AOT)

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request (TSCR) No. 230. Also enclosed is a Certificate of Service for this request certifying service to the chief executive of the township in which the facility is located, as well as the designated official of the State of New Jersey Bureau of Nuclear Engineering.

The purpose of this TSCR is to delete a specification which requires a thorough inspection of the Emergency Diesel Generator (EDG) every 24 months during shutdown. Inspecting the diesels and overhauling them, if necessary, is prudent, recommended by the vendor and will continue. GPUN believes that it is inappropriate to incorporate this requirement into the technical specifications. The inspection will be included in the facility's maintenance program with the option of performing the inspection during the operating cycle. In addition, this TSCR proposes to delete the phrase "in any thirty day period" from a specification concerning Allowed Outage Time (AOT). GPUN believes that the inspection of the EDG is more appropriately located in the maintenance program than in the Technical Specifications. Each of these changes is consistent with NUREG 1433 "Standard Technical Specifications General Electric Plants BWR/4."

A portion of a specification which concerns engineered safety features (ESF) normally served by the operable diesel has also been deleted. The conditions it addresses are covered by another specification. Furthermore, an AOT of 14 days (rather than 7 days) is proposed for periodic EDG inspection and overhaul if necessary. A risk analysis was prepared comparing the Core Damage Frequency (CDF) of the two AOT periods. The proposed change would result in an absolute core

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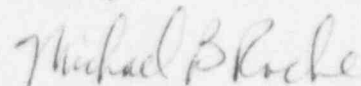
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In addition, one specification has been repositioned but not changed. Finally, several wording changes were made to enhance clarity and to correct two minor typographical errors.

GPU Nuclear considers this submittal to be a Cost Beneficial Licensing Action (CBLA). A savings of more than \$100K will be realized through the use of in-house labor rather than contractors and a reduction in the need for electrical cross ties during outages. Furthermore, the scheduling of system outage windows will be facilitated and outage duration may be reduced. To permit sufficient time to adjust system outage windows and other planning considerations, GPUN requests that this request be approved by April 30, 1996.

Pursuant to 10 CFR 50.91(a)(1), enclosed is an analysis applying the standards in 10 CFR 50.92 to make a determination of no significant hazards consideration.

Sincerely,

A handwritten signature in cursive script that reads "Michael B. Roche".

Michael B. Roche
Vice President and Director
Oyster Creek

Attachments

DPK/plp

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