



GPU Nuclear, Inc.
U.S. Route #9 South
Pos. Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

November 12, 1996
6730-96-2090

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Operating License No. DPR-16
Docket No. 50-219
Technical Specification Change Request No. 224

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

Revised Title 10 of the Code of Federal Regulations (10 CFR) Part 20, "Standards for Protection Against Radiation" became effective on June 20, 1991. GPU Nuclear implemented the revised 10 CFR Part 20 on January 1, 1994 as required. In implementing the new Part 20, the NRC Draft Generic Letter, "Guidance For Modification of Technical Specifications To Reflect Revisions to 10 CFR 20", stated that licensees are not required to amend their existing technical specifications; however, for the sake of clarity in correlating specific technical specification provisions, the NRC staff encouraged licensees to request technical specification changes.

This TSCR 224 provides proposed changes to Oyster Creek Technical Specifications to reflect the implementation of the revised 10 CFR Part 20.

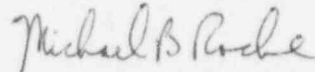
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This change request has been reviewed in accordance with Section 6.5 of the OCNGS Technical Specifications, and using the standards in 10 CFR 50.92 we have concluded that this proposed change does not constitute a significant hazards consideration.

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,

A handwritten signature in dark ink, appearing to read "Michael B. Roche". The signature is fluid and cursive, with the first name "Michael" and last name "Roche" being clearly legible.

Michael B. Roche
Vice President and Director
Oyster Creek

Attachments
MBR/YN/crb

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



GPU Nuclear, Inc.
U.S. Route #9 South
Post Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

November 12, 1996
6730-96-2090

Mr. Kent Tosch, Director
Bureau of Nuclear Engineering
Department of Environmental Protection
CN 411
Trenton, NJ 08625

Dear Mr. Tosch:

Subject: Oyster Creek Nuclear Generating Station
Facility Operating License No. DPR-16
Technical Specification Change Request No. 224

Pursuant to 10 CFR 50.91(b)(1), please find enclosed a copy of the subject document which was filed with the United States Nuclear Regulatory Commission on *Nov. 12, 1996*.

Very truly yours,

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

Michael B. Roche
Vice President and Director
Oyster Creek

Attachment
MBR/YN/crb



GPU Nuclear, Inc.
U.S. Route #9 South
Post Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

November 12, 1996
6730-96-2090

The Honorable John Parker
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

Dear Mayor Parker:

Enclosed herewith is one copy of Technical Specification Change Request No. 224 for the Oyster Creek Nuclear Generating Station Operating License.

This document was filed with the United States Nuclear Regulatory Commission on *Nov. 12*, 1996.

Very truly yours,

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

Michael B. Roche
Vice President and Director
Oyster Creek

Attachment
MBR/YN/crb

GPU NUCLEAR, INC.
OYSTER CREEK NUCLEAR GENERATING STATION

Facility Operating
License No. DPR-16

Technical Specification Change Request
No. 224
Docket No. 50-219

Applicant submits, by this Technical Specification Change Request No. 224 to the Oyster Creek Nuclear Generating Station Operating License, a change to pages 1.0-6, 1.0-7, 3.1-12, 3.1-16, 3.6-5, 3.6-6, 4.6-1, 6-11, 6-13, 6-17, 6-18 and 6-19.

BY Michael B. Roche
Michael B. Roche
Vice President and Director
Oyster Creek

Sworn and Subscribed to before me this 12 day of Nov, 1996.

Geraldine E. Levin
A Notary Public of NJ

GERALDINE E. LEVIN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 6-8-2000

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
GPU Nuclear, Inc.)

Docket No. 50-219

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 224 for Oyster Creek Nuclear Generating Station Operating License, filed with the U. S. Nuclear Regulatory Commission on Nov. 12, 1996 has this day of 11/21/1996, been served on the Mayor of Lacey Township, Ocean County, New Jersey by deposit in the United States mail, addressed as follows:

The Honorable John Parker
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

By Michael B. Roche
Michael B. Roche
Vice President and Director
Oyster Creek

OYSTER CREEK NUCLEAR GENERATING STATION
OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 224

Applicant hereby requests the Commission to change Facility Operating License No. DPR-16 as discussed below, and pursuant to 10 CFR 50.91, an analysis concerning the determination of no significant hazards consideration is also presented:

I. SECTIONS TO BE CHANGED

Sections 1.36, 1.38, 3.6, 4.6, 6.8.4, 6.9, 6.10, and 6.13.

II. CHANGES REQUESTED

GPU Nuclear requests that the following changed replacement pages be inserted into existing Technical Specifications (T.S.):

Replace the existing pages 1.0-6, 1.0-7, 1.0-8, 3.1-12, 3.1-16, 3.6-1, 3.6-5, 3.6-6, 4.6-1, 6-11, 6-13, 6-17, 6-18, and 6-19 with the attached revised pages 1.0-6, 1.0-7, 3.1-12, 3.1-16, 3.6-5, 3.6-6, 4.6-1, 6-11, 6-11a, 6-13, 6-17, 6-18, and 6-19.

Please note that pages 1.0-6 and 1.0-8 are listed above since some of the information provided on these pages have been shifted due to the change in the font size.

III. EXTENT OF CHANGE

TSCR 224 proposes changes to Sections 1.36, 1.38, 3.6, 4.6, 6.8.4, 6.9, 6.10, and 6.13 to reflect changes to the radiation protection standards in 10 CFR Part 20 which were implemented at Oyster Creek Nuclear Generating Station on January 1, 1994.

IV. DESCRIPTION OF CHANGES

In accordance with 10 CFR 50.90, the following changes to the Oyster Creek T.S. are being requested:

1. Page 1.0-6 T.S. 1.36 under DEFINITIONS for OFFSITE DOSE CALCULATION MANUAL (ODCM) is being revised to replace the referenced sections 3.6 and 3.15 with section 6.8.4.
2. Page 1.0-7 The words "or UNRESTRICTED AREAS" were added to the Definition for TS 1.38 EXCLUSION AREA.

3. Page 3.1-12 Trip Setting for "High Radiation In Offgas Line" under "Offgas System Isolation" in Table 3.1.1, "Protective Instrumentation requirement" is being revised from $\leq 2.1/E$ Ci/sec to $\leq 2,000$ mRem/hr.
4. Page 3.1-16 Note e. is being revised to reflect the proposed Offgas System Isolation trip setting.
5. Page 3.6-1 T.S. 3.6 under Objective is being revised to replace 10 CFR Part "20.106" with the new corresponding section "20.1301".
6. Page 3.6-5 The BASES for T.S. 3.6.C is being revised to state that the resulting concentrations in the event of an uncontrolled release of tanks would be less than the limits of 10 CFR Part 20.1001-20.2402, Appendix B, Table 2, Column 2 in the canal.
7. Page 3.6-5 BASES for T.S. 3.6.E is being revised to remove the wording "30 minutes", "of 0.3 Ci/sec" and change a whole body radiation dose of "0.5 rem per year" to "0.1 rem per year".
8. Page 3.6-6 All three paragraphs in the BASES for T.S. 3.6.E on this page are being replaced with new paragraphs to reflect recent studies.
9. Page 4.6.1 T.S. 4.6 is being revised to replace the word "reasonable" with "reasonably" and replace the wording "10 CFR Part 20.106" with "10 CFR Part 20".
10. Page 6-11 T.S. 6.8.4.a.2. is being revised to state that the concentrations of radioactive materials released in liquid effluents to the UNRESTRICTED AREA will be less than the concentration values specified in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402.
11. Page 6-11 T.S. 6.8.4.a.3 is being revised to reference section 20.1302 of 10 CFR Part 20 as opposed to section 20.106 of 10 CFR Part 20.
12. Page 6-11 T.S. 6.8.4.a.7 is being revised to restrict dose rates above background to a MEMBER OF THE PUBLIC in the UNRESTRICTED AREA to less than or equal to 500 mRem/yr. to the total body or to less than or equal to 3000 mRem/yr. to the skin. This T.S. section also restricts the thyroid dose rate above background via the inhalation pathway to less than or equal to 1500 mRem/yr. .
13. Page 6-11 T.S. 6.8.4.a.8 is being revised to replace the words "beyond the EXCLUSION AREA boundary" with the words "to the UNRESTRICTED AREA". Also the words "UNRESTRICTED AREAS" are replaced with "the UNRESTRICTED AREA" for T.S. 6.8.4.a.2, 6.8.4.a.4 and 6.8.4.a.7.

14. Page 6-13 T.S. 6.9.1.b is being revised to indicate that the annual tabulation of station, utility, and other personnel (including contractors) receiving greater than 100 mRem/yr includes only those for whom monitoring was required.
15. Page 6-13 T.S. 6.9.1.b is being revised to reference Section 20.2206 of 10 CFR Part 20 as opposed to Section 20.407 of 10 CFR Part 20.
16. Page 6-17 T.S. 6.10.1.g is being deleted and its requirements are being moved to 6.10.2.o.
17. Page 6-17 T.S. 6.10.2.d is being revised to provide clarification consistent with the requirements in the revised 10 CFR Part 20. Specifically, the revision requires retention of dose records only for those individuals for whom monitoring is required as opposed to all individuals who enter radioactive material areas.
18. Page 6-18 T.S. 6.10.2.o is being added by moving "Records of radioactive shipments" from T.S. section 6.10.1 to T.S. section 6.10.2.
19. Page 6-18 T.S. 6.13.1 is being revised to reference section 10 CFR 20.1601 as opposed to 10 CFR 20.203(c)(2).
20. Page 6-18 & Page 6-19 T.S. 6.13.1 and T.S. 6.13.2 are being revised to provide wording consistent with the definition of high radiation areas provided in section 20.1003.

V. REASON FOR CHANGE

Revised Title 10 of the Code of Federal Regulations (10 CFR) Part 20, "Standards for Protection Against Radiation" became effective on June 20, 1991. GPU Nuclear implemented the revised 10 CFR Part 20 on January 1, 1994 as required. The purpose of the revision to 10 CFR 20 was to modify the NRC's radiation protection standards to reflect developments in the principles and scientific knowledge underlying radiation protection and to reflect changes in the basic philosophy of radiation protection. In addition, the revision addresses international radiation protection standards in order to achieve a better level of uniformity with the requirements of other nations.

In implementing the new Part 20, the NRC Draft Generic Letter, "Guidance For Modification of Technical Specifications To Reflect Revisions to 10 CFR 20" states that licensees are not required to amend their existing technical specifications. This is because the existing radiological effluent technical specifications are generally more restrictive than the comparable requirements of the revised 10 CFR Part 20. Therefore, the current T.S. provides the adequate level of protection of public health and safety and is consistent with the requirements of the

revised 10 CFR 20. However, for the sake of clarity in correlating specific T.S. provisions, the NRC staff encouraged licensees to request T.S. changes. This TSCR provides proposed changes to Oyster Creek Technical Specifications to reflect the implementation of the revised 10 CFR Part 20.

VI. JUSTIFICATION FOR CHANGE

1. Change 1 - DEFINITION 1.36 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Due to the recent revision to the ODCM, the new section designation, 6.8.4, was assigned for Radioactive Effluent Controls and Radiological Environmental Monitoring Programs. This change is editorial in nature.

2. Change 2 - DEFINITION 1.38 EXCLUSION AREA

The words "UNRESTRICTED AREA" were added to define the area outside the Exclusion Area. The words UNRESTRICTED AREA already appear in the current Oyster Creek T.S. as well as the Standard BWR T.S. This change is editorial in nature.

3. Change 3 - Table 3.1.1

Air Ejector Offgas Radiation Monitors are read in mRem/hr rather than Ci/sec. This setpoint (i.e., 2,000 mRem/hr) is based on the 10 CFR 20.1301(a)(1) dose limit. This setpoint takes into consideration the reduction in release rate afforded by operation of the Augmented Offgas (AOG) System based on its historical operating record, historical offgas composition and the site specific meteorological data. These radiation monitors are process monitors and are not used to monitor effluent release to the environment.

4. Change 4 - Note e. for Table 3.1.1

This change is being proposed to reflect the Steam Jet Air Ejector (SJAE) Offgas Radiation Monitor set point calculated as described in Change 3 above.

5. Change 6 - BASES FOR T.S. 3.6.C

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting concentrations would be less than the limit given in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402 at the nearest potable water supply and the nearest surface water supply in an UNRESTRICTED AREA.

6. Change 7 - BASES FOR T.S. 3.6.E

Off gas System performance includes AOG operation which results in effective hold up time of much greater than 30 minutes.

The release rate of 0.3 Ci/sec is no longer applicable since credit is taken for historical offgas composition, use of AOG system and the new 10 CFR 20.1301(a)(1) dose limit.

The whole body radiation dose of 0.1 rem per year reflects the new 10 CFR 20.1301(a)(1) dose limit.

7. Change 8 - BASES FOR T.S. 3.6.E

Description provided in the BASES for T.S. 3.6.E on page 3.6-6 is being revised to describe the recent GPUN calculation for determining the SJA Offgas Radiation Monitors set point as discussed in item 3 above (Change 3).

8. Change 9 - T.S. 4.6

This change corrects an existing grammatical error. Also, this change deletes the referenced section from the old 10 CFR Part 20 which is no longer applicable.

9. Change 10 - T.S. 6.8.4.a.2

This specification is provided to ensure that the concentration of radioactive materials released in liquid waste effluents to UNRESTRICTED AREA will be less than the concentration values specified in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402.

10. Change 12 - T.S. 6.8.4.a.7

This specification provides reasonable assurances that radioactive material discharged in gaseous effluents will not result in the exposure of a MEMBER OF THE PUBLIC in an UNRESTRICTED AREA in excess of the design objectives of Appendix I to 10 CFR Part 50. This specification is provided to ensure that gaseous effluents from the site will be appropriately controlled. It provides operational flexibility for releasing gaseous effluents to satisfy the Section II.A. and II.C design objectives of Appendix I to 10 CFR Part 50. The specified released rate limits restrict, at all times, the corresponding dose rates above background to a MEMBER OF THE PUBLIC in an UNRESTRICTED AREA to less than or equal to 500 mRem/yr. to the total body or to less than or equal to 3000 mRem/yr. to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the inhalation pathway to less than or equal to 1500 mRem/yr. This specification does not affect the requirement to comply with the annual limitations of 10 CFR 20.1301(a).

11. Change 13 - T.S. 6.8.4.a.8, 6.8.4.a.2, 6.8.4.a.4 and 6.8.4.a.7

In consistent with definition given in Change 2 above the words "beyond the EXCLUSION AREA boundary" and "UNRESTRICTED AREAS" are replaced by "the UNRESTRICTED AREA". This is an editorial change.

12. Change 14 - T.S. 6.9.1.b

Technical Specification 6.9.1.b requires a report to be submitted annually which includes a tabulation of individuals receiving exposures greater than 100 mRem/yr. and their associated man-rem exposure according to work and job functions. Since the revised 10 CFR 20 only requires monitoring for certain individuals as defined in 10 CFR 20.1502, T.S. 6.9.1.b is being revised to clearly identify the individuals who are tabulated in the annual report. This is an administrative change which provides clarification and consistency between all report requirements. This change will not alter any of Oyster Creek's requirements or responsibilities for protection of the public and employees against radiation hazards.

13. Change 5 - T.S. 3.6
Change 11 - T.S. 6.8.a.3
Change 15 - T.S. 6.9.1.b
Change 19 - T.S. 6.13.1

This change is administrative in nature in that the change references the corresponding paragraphs in the "new" 10 CFR Part 20 as opposed to the paragraphs in the "old" 10 CFR Part 20 that are currently referenced.

14. Change 16 - T.S. 6.10.g
Change 18 - T.S. 6.10.2.o

T.S. 6.10.1.g is being deleted and moved to 6.10.2.o. This change is administrative and is consistent with the revised 10 CFR 20 requirement to maintain records of radioactive shipments for the duration of the unit Operating License.

15. Change 17 - T.S. 6.10.2.d

Technical Specification 6.10.2.d is being revised to provide clarification consistent with the requirements in the revised 10 CFR Part 20. Specifically, the revision requires retention of dose records only for those individuals for whom monitoring is required as opposed to all individuals who enter radiation control areas.

16. Change 20 - T.S. 6.13.1 and T.S. 6.13.2

These changes are administrative in nature, consistent with the requirements of the revised 10 CFR 20. T.S. 6.13.1 and T.S. 6.13.2 are being revised to provide wording and measurement distances consistent with the definition of high radiation area in 20.1003 and to identify the maximum doses associated with a high radiation area.

The revised 10 CFR Part 20 provides a new definition of a high radiation area which provides controls for areas accessible to individuals based on a radiation level measurement made at 30 cm.

VII. NO SIGNIFICANT HAZARDS CONSIDERATIONS

GPU Nuclear has determined that this TSCR involves no significant hazards considerations as defined by NRC in 10 CFR 50.92.

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or the consequences of an accident previously evaluated.

The proposed revisions to the liquid release rate limits and bases and gaseous effluent bases will not result in a change in the types or amounts of effluents released nor will there be an increase in individual or cumulative radiation exposures. In addition, these changes do not impact the operation or design of any plant structures, systems or components. These changes ensure compliance with 10 CFR 50.36a and 10 CFR 50 Appendix I and result in levels of radioactive materials in effluents being maintained ALARA. The revision to the high radiation area controls and dose measurement distance will ensure areas are conservatively posted as high radiation areas in compliance with 10 CFR 20.1601(a)(1) and provide controls to ensure individuals are not overexposed. Other proposed changes consist of revisions to 10 CFR 20 references to recognize the new section numbers, and administrative controls for record keeping to maintain compliance with the new Part 20.

These changes will not result in a change to plant design or operation. Therefore, it can be concluded that the proposed changes do not involve an increase in the probability or consequences of an accident previously evaluated.

2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed changes do not affect the plant design or operation nor do they result in a change to the configuration of any equipment. There will be no change in the types or increase in the amount of effluents released offsite.

Therefore, this proposed change cannot create the possibility of a new or different kind of accident from any previously evaluated.

OYSTER CREEK NUCLEAR GENERATING STATION
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 224

AFFECTED TECHNICAL SPECIFICATION PAGES
WITH PROPOSED CHANGES