



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

October 31, 1996
6730-96-2227

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219
Technical Specification Change Request No. 205

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request (TSCR) No. 205.

This TSCR requests deletion of Technical Specification Table 3.5.2 which lists automatic primary containment isolation valves. This request is in accordance with Generic Letter 91-08 which permits licensees to delete component lists such as Table 3.5.2. In addition, this TSCR clarifies the applicability of an action statement which applies to several limiting conditions for operation in Section 3.5 and deletes closure time requirements for several automatic isolation valves in Section 4.5.F.

In accordance with 10 CFR 50.91 (b)(1), the designated official of the State of New Jersey Bureau of Nuclear Engineering has been sent a copy of this TSCR.

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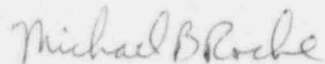
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Pursuant to 10 CFR 50.91(a)(1), enclosed is an analysis applying the standards in 10 CFR 50.92 to make a determination of no significant hazards considerations. This license amendment application has undergone a safety review in accordance with Section 6.5 of the Oyster Creek Technical Specifications and no unreviewed safety questions were identified.

If you should have any questions concerning this license amendment application, please contact Mr. Paul F. Czaya at (201) 316-7975.

Very truly yours,



Michael B. Roche
Vice President and Director
Oyster Creek

PFC

Attachments

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

GPU Nuclear, Inc.
Oyster Creek Nuclear Generating Station

Facility License No. DPR-16

Technical Specification Change Request No. 205
Docket No. 50-219

Applicant hereby submits changes to pages 1.0-2, 3.5-1 through 3.5-4, 3.5-8 through 3.5-12, 4.5-2, 4.5-3, 4.5-11 and 4.5-12 and deletes page 3.5-13.

By:

Michael B. Roche

Michael B. Roche
Vice President and Director
Oyster Creek

Sworn and Subscribed to before me this 31 day of October, 1996.

Geraldine Levin

A Notary Public of NJ

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



GPU Nuclear, Inc.
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Post Office Box 388
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6730-96-2227

October 31, 1996

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. 205

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 October 31, 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



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

6730-96-2227

October 31, 1996

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. 205 for the Oyster Creek Nuclear Generating Station Operating License.

This document was filed with the United States Nuclear Regulatory Commission on October 31, 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

United States of America
Nuclear Regulatory Commission

In the Matter of)
) Docket No. 50-219
GPU Nuclear, Inc.)

Certificate of Service

This is to certify that a copy of Technical Specification Change Request No. 205 for the Oyster Creek Nuclear Generating Station Operating License, filed with the U.S. Nuclear Regulatory Commission on October , 1996 has this day of October , 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

Technical Specification Change Request (TSCR) No. 205

I. Changes Requested

GPU Nuclear requests that Appendix A Technical Specification pages be replaced as follows:

Delete existing pages 1.0-2, 3.5-1 through 3.5-4, 3.5-8 through 3.5-13, 4.5-2, 4.5-3, 4.5-11 and 4.5-12 and replace them with attached revised pages 1.0-2, 3.5-1 through 3.5-4, 3.5-8 through 3.5-12, 4.5-2, 4.5-3, 4.5-11 and 4.5-12.

II. Reasons for Change

Technical Specification Table 3.5.2 is a list of valves which receive automatic primary containment isolation signals. Generic Letter (GL) 91-08 permits licensees to delete component lists such as Table 3.5.2 provided that certain conditions are met.

Maximum stroke times for several automatic isolation valves are given in Specification 4.5.F. As provided in GL 91-08 and the Improved Standard Technical Specifications (STS) NUREG-1433, stroke times for all but four of these valves can be deleted. The allowable closure time for the four main steam isolation valves is retained consistent with the STS

An administrative change to an existing action statement is proposed. Specification 3.5.A.7 is several pages removed from the condition statements to which it applies. To enhance clarity, the action statement is being inserted into each of those condition statements and deleted as a stand alone specification.

III. Safety Evaluation Justifying Change

Oyster Creek Technical Specifications describe conditions under which primary containment shall be maintained and specific steps to be taken if one or more automatic primary containment isolation valves is inoperable. In addition, the Technical Specifications require testing for automatic closure by isolation signal, post-maintenance operability testing, leak rate testing and specific closure times for particular valves.

Technical Specification Table 3.5.2 lists automatic primary containment isolation valves and describes the primary containment isolation signals they receive. The proposed deletion of Table 3.5.2 does not alter or reduce Technical Specification requirements but shifts identification of automatic primary containment isolation valves from Technical Specifications to controlled plant procedures. In addition, references to Table 3.5.2 have been deleted from the text and replaced by a description of the subject valves in

Specifications 3.5.A.3.a, 4.5.F.1, 4.5.F.2 and in Definition 1.13. These changes conform to the guidance contained in GL 91-08.

Valve stroke times are given in Specification 4.5.F.1 for main steam line, isolation condenser, cleanup, cleanup auxiliary pumps and shutdown cooling isolation valves. The proposed deletion of closure times for automatic primary containment isolation valves (except main steam line isolation valves) in Specification 4.5.F.1 does not remove the closure time test requirement which is retained in Specification 4.5.F.2. The isolation condenser isolation valves do not receive a primary containment isolation signal (the isolation condenser vent valves do, however). The isolation condenser isolation valves close on line break signals and are required to be tested in accordance with Specifications 4.8.A.1 and 2 which are not changed. Closure time limits are incorporated in controlled plant procedures. These time limits ensure design basis performance objectives are met as described in Technical Specification bases. The deletion of automatic primary containment isolation valve closure times is consistent with the guidance in GL 91-08 in that the closure time testing requirement remains in Specification 4.5.F.2 for automatic primary containment isolation valves and the inservice testing program required by Specification 4.3.C covers stroke time verification testing for these valves.

Specification 3.5.A.7 is an action statement which requires that a shutdown be initiated and the plant be in the cold shutdown condition within 24 hours if Specifications 3.5.A.1.a, b, c(1) and 3.5.A.2 through 3.5.A.5 cannot be met. The action required by Specification 3.5.A.7 has been inserted into Specifications 3.5.A.1 (as 3.5.A.1.d), 3.5.A.3 [as 3.5.A.3.a(2)] and 3.5.A.5 (as 3.5.A.5.d). Specification 3.5.A.2 establishes conditions to be satisfied before pressure suppression system maintenance and repair work can be performed. These conditions require the plant to be in the same condition as Specification 3.5.A.7 (cold shutdown). Therefore, the requirements of Specification 3.5.A.7 are redundant and it is unnecessary to insert the action statement into Specification 3.5.A.2. A previous license amendment had inserted the action statement into Specification 3.5.A.4 (as 3.5.A.4.c) and additional change is not required. This change does not modify the limiting conditions for operation nor the required action to be taken if those conditions are not met.

Technical Specification Definitions on pages associated with this TSCR are capitalized consistent with STS. Page 3.5-13 which contains Table 3.5.2 should be deleted as well as the existing page which contains Table 3.5.1. Table 3.5.1 was deleted by a previous license amendment.

Technical Specification bases have been revised to provide greater clarity regarding primary containment isolation valve design bases. The changes appear on pages 3.5-9, 4.5-11 and 4.5-12. For pagination purposes all Section 3.5 bases pages should be reissued. Amendment numbers at the bottom of each bases page have been revised to

reflect repagination and to reflect amendments which revised bases and not simply denoted previous repagination.

IV. No Significant Hazards Consideration

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

1. The proposed deletion of the automatic primary containment isolation valve Table 3.5.2 and closure times for several valves in Specification 4.5.F.1 are administrative in nature and do not affect the purpose, function, operability and testing requirements of the automatic primary containment isolation valves or the isolation condenser isolation valves. The required action contained in Specification 3.5.A.7 has been moved to the associated specifications and has not changed. Capitalizing definitions and deleting unneeded pages are also administrative changes which enhance the usability of the Technical Specifications. Therefore, the proposed changes do not increase the probability of occurrence or consequence of an accident previously evaluated.
2. The proposed changes are administrative and do not involve a physical change to plant configuration nor do they affect the performance of any equipment. Existing limiting conditions for operation and surveillance requirements are retained. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.
3. Deleting the list of valves in Table 3.5.2 and valve closure times in Specification 4.5.F.1 are administrative changes which do not affect the purpose or function of the automatic primary containment isolation valves. The listing of the automatic primary containment isolation valves and stroke time requirements will be in controlled plant procedures. Changes to the list or closure times can be made in accordance with review procedures required by Section 6.5 of the Technical Specifications and 10 CFR 50.59. Similarly, inserting the statement of required action in Specification 3.5.A.7 into the Specifications to which it applies does not modify the condition or the action to be taken and is an administrative change which clarifies the Technical Specifications. Therefore, the margin of safety is not reduced.

V. Implementation

It is requested that the license amendment authorizing the proposed changes be effective 60 days after issuance to permit required procedure changes to be implemented.