



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

March 21, 2000
1940-00-20040

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

Gentlemen,

Subject: Oyster Creek Nuclear Generating Station, (OCNGS)
Docket No. 50-219
Technical Specification Change Request No. 276
Delete Reporting Requirement for Core Spray Sparger Inspection

In accordance with 10 CFR 50.4(b)(1), enclosed is Oyster Creek Technical Specification Change Request (TSCR) No. 276. The purpose of this TSCR is to delete the reporting requirements for the core spray sparger inspection contained in license condition 2.C (5) and specification 6.9.3.d.

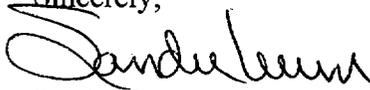
GPUN is required to perform an inspection of the core spray sparger and repair assemblies at each refueling outage, to submit results and provide an evaluation of the safety significance of any new or progressing indications, and to obtain NRC authorization before the plant is restarted from the refueling outage. The intent of this TSCR is to provide technical justification for modifying paragraph 2.C.(5) of the Oyster Creek license and deleting the reporting requirements in T.S. Section 6.9.3d for refueling outage 18R and subsequent outages. As an alternative, the core spray sparger inspections would be performed in accordance with BWRVIP-18, "BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines". The requirement to obtain NRC restart authorization for each refueling outage would be eliminated and the inspection results would not be docketed before startup. The inspection results will be submitted to the NRC as part of the ASME Section XI ISI Summary as required by BWRVIP-18.

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Using the standards in 10 CFR 50.92, GPU Nuclear, Inc. has concluded that these proposed changes do not constitute a significant hazards consideration, as described in the enclosed analysis performed in accordance with 10 CFR 50.91(a)(1). Also enclosed is a Certificate of Service for this request, certifying service to the chief executives of the township and county in which the facilities are located, as well as the designated official of the state of New Jersey, Bureau of Nuclear Engineering.

If additional information is required, please contact Dennis Kelly of my staff at (609) 971-4246.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sander Levin".

Sander Levin
Acting Director
Oyster Creek

cc: Region I Administrator
Oyster Creek Project Manager
Oyster Creek Senior Resident Inspector



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Mr. Kent Tosch, Director
Bureau of Nuclear Engineering
Department of Environmental Protection
CN 415
Trenton, NJ 08628

Dear Mr. Tosch:

Subject: Oyster Creek Nuclear Generating Station
Operating License No. DPR-16
Technical Specification Change Request No. 276

Enclosed is one copy of the Technical Specification Change Request No. 276 for the Oyster Creek Nuclear Generating Station Operating License.

This document was filed with the U.S. Nuclear Regulatory Commission on March 21, 2000.

Very truly yours,

A handwritten signature in cursive script that reads "Sander Levin".

Sander Levin
Acting Director
Oyster Creek

SL/DPK
Enclosure



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U.S. Route #9 South
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Tel 609-971-4000

March 21, 2000
1940-00-20040

The Honorable William J. Boehm
Mayor of Lacey Township
818 West Lacey Road
Forked River, NJ 08731

Dear Mayor:

Subject: Oyster Creek Nuclear Generating Station
Operating License No. DPR-16
Technical Specification Change Request No. 276

Enclosed is one copy of the Technical Specification Change Request No. 276 for the Oyster Creek Nuclear Generating Station Operating License.

This document was filed with the U.S. Nuclear Regulatory Commission on March 21, 2000.

Very truly yours,

A handwritten signature in cursive script that reads "Sander Levin".

Sander Levin
Acting Director
Oyster Creek

SL/DPK
Enclosure

OYSTER CREEK NUCLEAR GENERATING STATION

OPERATING LICENSE
NO. DPR-16

TECHNICAL SPECIFICATION
CHANGE REQUEST NO. 276
DOCKET NO. 50-219

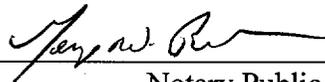
Applicant submits by this Technical Specification Change Request No. 276 to the Oyster Creek Nuclear Generating Station Technical Specifications, modified page 4 of the License and page 6-16.

By:



Sander Levin
Acting Director
Oyster Creek

Sworn to and Subscribed before me this. day of *March 21, 2000*



Notary Public

GEORGE W. BUSCH
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Aug. 8, 2000

I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NUMBER 276

GPU Nuclear requests that the following replacement pages be inserted into the existing Technical Specifications:

Replace existing page 4 of the Oyster Creek License and page 6-16 with the attached replacement pages.

II. REASON FOR CHANGE

By Amendment #70 to the Oyster Creek License, and reporting requirements of Section 6.9.3d of the Technical Specifications (T.S.), GPUN is required to perform an inspection of the core spray spargers and repair assemblies at each refueling outage. In addition, GPUN is required to submit the results, provide an evaluation of the safety significance of any new or progressing indications, and to obtain NRC authorization before the plant is restarted from the refueling outage.

GPU Nuclear has previously requested relief from this reporting requirement and the request was subsequently denied. The denial stated that the visual method of inspection needs to be reviewed and approved by NRC since the method may not be appropriate. The June 7, 1996 letter (Ronald B. Eaton to M.B. Roche) that denied the request noted the NRC was evaluating "BWRVIP-03 (BWR Vessels and Internals Project, Reactor Pressure Vessel and Internals Examination Guidelines)". The letter anticipated a supplement to BWRVIP-03 that would address revised inspection requirements for core spray piping, spargers and associated components. Upon development of such guidance "the staff will reassess the need to revise inspection requirements generically for the core spray system". The NRC approval of the BWRVIP-18 inspection methodology and techniques appears to fulfill that statement.

III. SAFETY EVALUATION JUSTIFYING CHANGE

During the 1978 refueling outage at the OCNCS, a scheduled inservice inspection of the reactor internals identified and confirmed the existence of a crack at azimuth 208° in the upper sparger. The crack was determined to extend approximately halfway around the sparger circumference by examination. By supplying air to the sparger, gas bubbles were observed from the crack, and it was concluded that the crack was through-wall for about 135°. Even though structural and hydraulic analyses indicated that the cracked sparger was adequate for continued operation, an additional mechanical support was installed.

In the SER supporting Amendment 47, dated May 15, 1980, the staff found the licensee's design and installation of the repair bracket assemblies were in accordance with currently accepted engineering practices. Further, the analyses of the structural loads imposed by static, seismic and thermal loadings demonstrated the bracket assembly's ability to limit the crack opening to within an acceptable range should an existing crack propagate around the pipe circumference. The staff concluded that high installation stresses, material sensitization, cold work, local heating, etc. were all probable causes for the initiation of stress corrosion cracking, and agreed that the crack could relieve stresses and reduce the susceptibility of stress corrosion cracking in other locations. However, the staff found insufficient basis to conclude that stress corrosion crack initiation and propagation were eliminated completely.

In the SER supporting Amendment 70, dated January 26, 1984, the staff attributed the lack of previous inspection reliability to the metal surface reflectivity, and the inability to focus on an in situ artificial flaw, such as a vibrotooled (or engraved) component or part identification marking. However, the staff stated that the minor cracking that may escape detection is insignificant in terms of both structural integrity or flow distribution, and the visual inspection as supplemented by the enhanced video assessment technique was adequate to conclude that a significant progression had not occurred. The staff required that future inspections by a method acceptable to them of all accessible surfaces and welds of both core spray spargers and repair assemblies be performed at each refueling outage, so meaningful comparisons with previous inspections could be made.

Initial NRC concerns about the propagation of existing cracks, and the initiation of new cracks, should be mitigated by the installation of repair brackets, and the positive results (no sparger indications) from the 1983, 1986, 1988, 1991, 1992, 1994, 1996 and 1998 refueling outage inspections. In 1992, two indications were discovered in the annulus piping welds but GPUN determined that the cause was poor weld quality or lack of fusion and the NRC concurred.

Amending license condition 2.C.(5) such that the core spray sparger and annulus piping are now part of the scheduled inspection of reactor internals as part of the BWRVIP requirements would eliminate the administrative process associated with obtaining separate NRC approvals for inspection methods and review of inspection results. It would also eliminate the need to prepare the report described in Specification 6.9.3.d to obtain restart authorization at the end of each refueling outage. However, visual inspections will continue as part of the inservice inspection program for reactor internals, and will include all accessible areas of the Core Spray Sparger assemblies, and inlet piping between the shroud and the vessel wall. The inspection results will be submitted to the NRC as part of the ASME Section XI ISI Summary as required by BWRVIP-18 Guidelines.

Specification 6.9.3.d also contains a reference to Table 4.3.1 Item 9. That Table contained the original ISI/IST requirements for Oyster Creek. It was eliminated by Amendment 82 in 1985 with the establishment of the formal ISI program. At that time any reference to the Table was supposed to have been eliminated from the Technical Specifications. Since the Table itself no longer exists, deleting the reference at this time is editorial in nature and has no impact on safety.

IV. NO SIGNIFICANT HAZARDS DETERMINATION

GPU Nuclear has determined that this TSCR poses no significant hazard as defined by 10 CFR 50.92.

1. Will operation of the facility in accordance with the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed change is in accordance with the BWRVIP-18, "BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines" which was reviewed and approved by the NRC. Visual inspections will continue as part of the inservice inspection program for reactor internals, and will include all accessible areas of the Core Spray Sparger assemblies, and inlet piping between the shroud and the vessel wall. The inspection results will be submitted to the NRC as part of the ASME Section XI ISI Summary as required by BWRVIP-18. This change will not alter the physical design of the plant nor is there a change to an operating parameter of any system, component or structure. Therefore, the probability of occurrence or the consequences of an accident previously evaluated in the SAR will not increase as a result of this change.

2. Will operation of the facility in accordance with the proposed amendment create the possibility of a new or different accident from any accident previously evaluated?

The proposed change revises the administrative requirements associated with the inspection of the core spray spargers and piping. Visual inspection of the spargers and the reporting of results will be performed in accordance with BWRVIP-18, which has been reviewed and approved by the NRC. This change will not alter the physical design of the plant nor is there a change to an operating parameter of any system, component or structure. Therefore, the proposed activity does not create the possibility for an accident or malfunction of a different type than any previously identified in the SAR.

3. Will operation of the facility in accordance with the proposed amendment involve a significant reduction in a margin of safety?

The proposed change is in accordance with the BWRVIP-18, "BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines" which was reviewed and approved by the NRC. The change will not alter the physical design of the plant and does not modify an operating parameter of any system, component or structure. Visual inspections will continue as part of the inservice inspection program for reactor internals, and the results incorporated into the ASME Section XI ISI Summary. The change, therefore, is primarily administrative. Consequently, there is no reduction in the margin of safety.

V. IMPLEMENTATION

GPU Nuclear requests that this amendment be effective upon issuance.

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- (4) The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Oyster Creek Nuclear Generating Station Physical Security Plan," with revisions submitted through July 6, 1988; "Oyster Creek Nuclear Generating Station Training and Qualification Plan," with revisions submitted through June 24, 1986; and "Oyster Creek Nuclear Generating Station Safeguards Contingency Plan," with revisions submitted through June 24, 1986. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.
- (5) Inspections of all accessible surfaces and welds of both core spray spargers and repair assemblies will be performed, at least once per 24 months, in accordance with BWR VIP-18 "BWR Core Spray Internal Inspection and Flaw Evaluation Guidelines".
- (6) Long Range Planning Program

The revised "Plan for the Long-Range Planning Program for the Oyster Creek Nuclear Generating Station" (the Plan) submitted by GPUN letter C321-94-2140 dated September 26, 1994, is approved.

 - a. The Plan shall be followed by the licensee from and after November 28, 1994.

6.9.3 UNIQUE REPORTING REQUIREMENTS

Special reports shall be submitted to the Director of Regulatory Operations Regional Office within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification.

- a. Materials Radiation Surveillance Specimen Reports (4.3A)
- b. (Deleted)
- c. Results of required leak tests performed on sealed sources if the tests reveal the presence of 0.005 microcuries or more of removable contamination.
- d. Deleted
- e-j. Pursuant to the ODCM.
- k. Records of results of analyses required by the Radiological Environmental Monitoring Program.
- l. Failures and challenges to Relief and Safety Valves which do not constitute an LER will be the subject of a special report submitted to the Commission within 60 days of the occurrence. A challenge is defined as any automatic actuation (other than during surveillance or testing) of Safety or Relief Valves.
- m. Plans for compliance with standby liquid control Specifications 3.2.C.3(b) and 3.2.C.3(e)(1) or plans to obtain enrichment test results per Specification 4.2.E.5.
- n. Inoperable high range radioactive noble gas effluent monitor (3.13.H)