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June 14, 2000  
1940-00-20146

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 (TSCR) No. 273  
Surveillance Frequency of Excess Flow Check Valves**

On March 7, 2000 GPU Nuclear submitted TSCR 273 "Surveillance Frequency of Excess Flow Check Valves". In accordance with usual practice, GPU included the reason for the proposed change, a safety evaluation justifying the change and the Oyster Creek determination of no significant hazards. In a subsequent telephone conversation with the NRC, it was suggested that the discussion in the determination of no significant hazards was not sufficiently detailed.

Attached to this letter is an alternative determination of no significant hazards. If you have any questions concerning the document or require additional information, please contact Dennis Kelly of the Oyster Creek Licensing staff at (609) 971-4246.

Sincerely,

Sander Levin  
Acting Director  
Oyster Creek

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

Sworn and Subscribed before me this 14<sup>th</sup> day of June, 2000.

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



A001

## ALTERNATE NO SIGNIFICANT HAZARD DETERMINATION FOR TSCR 273

### 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?

This change will not alter the physical design of the plant. The proposed Amendment would modify the testing of excess flow check valves (EFCV) from each valve being tested once per refueling interval to testing a representative sample of EFCVs once per 24 months (the length of a refueling interval). The EFCVs installed at Oyster Creek are extremely reliable. Oyster Creek records demonstrate that there has never been a failure of an EFCV to isolate in the thirty-year history of Oyster Creek. A GE Topical Report evaluated the reliability of EFCVs installed at Oyster Creek and other plants. Oyster Creek and three other facilities have installed Chemquip excess flow check valves. Chemquip EFCVs were shown in the Topical Report to have a failure rate of  $1.78E-7$ , which was the lowest of the valve manufacturers included in the evaluation. The current Oyster Creek accident analysis does not take credit for any flow restriction provided by EFCVs although the valve design does restrict flow. Therefore, changing the surveillance requirements for the EFCVs does not involve a significant increase in the probability of an accident.

EFCVs limit the reactor coolant release following the failure of an instrument line, valve or component on an instrument line. The valves isolate at a given flow and are periodically functionally tested to ensure proper isolation with resulting minimal flow. The radiological consequences of an instrument line break have been evaluated at Oyster Creek. That evaluation does not take credit for the excess flow check valve when assessing the radiological consequences of the accident. The analysis was submitted to the NRC and was approved in NUREG 1382 "Safety Evaluation Report related to the full term operating license for Oyster Creek Nuclear Generating Station." This change will not increase the consequences of an instrument line break or any postulated accident.

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?

Operation of the facility in accordance with the proposed amendment would modify the testing frequency of EFCVs. This change does not add components or make any other physical change to the plant. The valves will be tested in the same manner as they are now although less frequently. EFCVs are located exclusively in instrument lines and the failure of an instrument line is currently analyzed in the FSAR. The plant is not being physically changed, and the consequences of a valve failing to isolate are within the FSAR analyzed event. Therefore, this change does not create the possibility of a new or different accident not previously analyzed.

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

The proposed Amendment would modify the testing frequency of excess flow check valves (EFCVs) which are located in instrument lines. The only function of EFCVs is to limit the reactor coolant release following the failure of an instrument line, valve or component on an instrument line. The current Oyster Creek accident analysis does not take credit for any flow restriction provided by EFCVs, although the valve design does restrict flow. The proposed change does not alter the plant design in any manner. Furthermore, the instrument line break analysis assumptions also remain unchanged. Therefore, there is no impact on the current procedures or accident analysis. As a result, operating the plant in accordance with the proposed Amendment does not involve a significant reduction in a margin of safety.