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June 5, 2000
1940-00-20135

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. 276
Delete Reporting Requirement for Core Spray Sparger Inspection

On March 21, 2000 GPU Nuclear submitted TSCR 276 "Delete Reporting Requirement for Core Spray Sparger Inspection". 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,

A handwritten signature in black ink, appearing to read "Sander Levin", written over a horizontal line.

Sander Levin
Acting Director
Oyster Creek

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

AC001

ALTERNATE NO SIGNIFICANT HAZARDS DETERMINATION FOR TSCR 276

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 does not add components or make any other physical change to the plant. The change involves inspection methodology. In the SER supporting Amendment 70 to the Oyster Creek Technical Specifications, dated January 26, 1984, the staff required that future inspections of all accessible surfaces and welds of both core spray spargers and repair assemblies be performed at each refueling outage. In order to ensure that meaningful comparisons with previous inspections could be made, the staff required such inspections be performed in accordance with a method acceptable to them. To comply with that requirement, prior to each refueling outage, Oyster Creek submitted a detailed inspection plan. On December 2, 1999 the NRC staff issued an SER which approved the methodology contained in "BWR Vessel and Internals Project BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines" (BWRVIP-18). Oyster Creek was an active participant in the development of the guidelines and has committed to use them as a License condition. In addition, the inspection results will be submitted to the NRC as part of the ASME Section XI ISI Summary as required by the BWRVIP-18 Guidelines. The probability of an accident is not increased by this change of inspection methodology.

With no physical changes to the plant or any operating parameter and the use of a formally approved inspection methodology, the consequences of any postulated accident are not increased.

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 core spray spargers and the other components of the Core Spray System will not be modified by this change. The function of the Core Spray System is to provide an alternate supply of cooling water, that is independent of the Feedwater System, in the event of an accident. This change will incorporate into the Oyster Creek License a commitment to inspect the core spray spargers and other reactor internals during each

refueling outage in accordance with a methodology approved for all BWRs by the NRC. The function and operation of the Core Spray System are not affected by this change in inspection methodology. Therefore, the possibility of a new or different accident not previously analyzed is not created.

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

In the SER supporting Amendment 47 to the Oyster Creek Technical Specifications, 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 inspection requirement was imposed to ensure that any new cracks or propagation of existing cracks would be discovered as soon as possible so corrective action could be taken. This change does not affect the interval between inspections but imposes a standardized, comprehensive methodology approved by the NRC. Therefore, the proposed change does not involve a significant reduction in the margin of safety.