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Vice President

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2130-00-20230
September 15, 2000

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 25555

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Facility License No. DPR-16
Technical Specification Change Request (TSCR) No. 270
Response to Request for Additional Information

References: 1) GPU Nuclear Letter 1940-99-20558 to the USNRC dated December 1, 1999, "Technical Specification Change Request No. 270, Testing Protocol for Activated Charcoal in ESF Systems"

2) GPU Nuclear Letter 1940-99-20026 to the USNRC dated March 7, 2000, "Technical Specification Change Request No. 273, Surveillance Frequency of Excess Flow Check Valves (EFCV)"

This letter responds to the NRC staff verbal request for additional information concerning the Reference 1 license amendment application as discussed in telephone calls on June 19, 2000 and September 7, 2000. The purpose of TSCR No. 270 is to revise the standard for testing charcoal filters in the Oyster Creek standby gas treatment system (SGTS) to ASTM D3803-1989. In addition, the acceptance criterion for absorption efficiency would also be increased. These changes are proposed in accordance with Generic Letter 99-02.

The information the staff requested pertains to the charcoal bed depth of the standby gas treatment system filters, the residence time of flow through the charcoal bed at the maximum SGTS flow rate permitted by Technical Specifications and the velocity of flow at the face of the SGTS charcoal bed. The charcoal bed depth is 2 inches, the face velocity is calculated at 45.72 feet per minute at a flow rate of 2860 cubic feet per minute, which yields a residence time of 0.219 seconds.

The staff requested that the face velocity value be included in the Technical Specification surveillance requirement for charcoal testing. The revised Technical Specification page 4.5-5 is contained in Enclosures 1 and 2 that reflects the addition of the charcoal bed face velocity to Technical Specification 4.5.H.1.a(2). This test parameter, combined with the revised test standard and the temperature and relative humidity parameters in the current surveillance

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requirement, ensures that test results accurately reflect the capability of the SGTS to filter radioactive releases consistent with its design basis. The revised page 4.5-5 contained in Enclosure 1 should be used if the license amendment associated with Reference 1 is issued prior to the license amendment associated with Reference 2 since both amendment requests are pending approval and affect the same Technical Specification page. Conversely, if issuance of the Reference 2 license amendment proceeds the amendment associated with Reference 1, then the revised page 4.5-5 contained in Enclosure 2 should be used.

AmerGen Energy has reviewed the significant hazard determination contained in Reference 1 and concluded that the addition of the face velocity value to Specification 4.5.H.1.a(2) does not alter the conclusion of that determination. Therefore, the significant hazard determination remains valid.

If additional information is required, please contact Paul Czaya of Oyster Creek Licensing at (609) 971-4139.

Very truly yours,

Ron J. DeGregorio
Vice President
Oyster Creek

Sworn to and subscribed before me this 15th day of September, 2000.

Notary Public

GEORGE W. BUSCH
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Aug. 8, 2005

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

Enclosure 1

Revised Technical Specification Page 4.5-5

Before Technical Specification Change Request No. 273 Issued

(2) Results of laboratory carbon sample analysis show ≥95% radioactive methyl iodide removal efficiency when tested in accordance with ASTM D 3803-1989 (30°C, 95% relative humidity, at least 45.72 feet per minute charcoal bed face velocity).

b. At least once per 18 months by demonstrating:

(1) That the pressure drop across a HEPA filter is equal to or less than the maximum allowable pressure drop indicated in Figure 4.5.1.

(2) The inlet heater is capable of at least 10.9 KW input.

(3) Operation with a total flow within 10% of design flow.

c. At least once per 30 days on a STAGGERED TEST BASIS by operating each circuit for a minimum of 10 hours.

d. Anytime the HEPA filter bank or the charcoal absorbers have been partially or completely replaced, the test per 4.5.H.1.a (as applicable) will be performed prior to returning the system to OPERABLE STATUS.

e. Automatic initiation of each circuit every 18 months.

I. Inerting Surveillance

When an inert atmosphere is required in the primary containment, the oxygen concentration in the primary containment shall be checked at least weekly.

J. Drywell Coating Surveillance

Carbon steel test panels coated with Firebar D shall be placed inside the drywell near the reactor core midplane level. They shall be removed for visual observation and weight loss measurements during the first, second, fourth and eighth refueling outages.

K. Instrument Line Flow Check Valves Surveillance

The capability of each instrument line flow check valve to isolate shall be tested at least once in every period between refueling outages. Each time an instrument line is returned to service after any condition which could have

Enclosure 2

Revised Technical Specification Page 4.5-5

After Technical Specification Change Request No. 273 Issued

(2) Results of laboratory carbon sample analysis show ≥95% radioactive methyl iodide removal efficiency when tested in accordance with ASTM D 3803-1989 (30°C, 95% relative humidity, at least 45.72 feet per minute charcoal bed face velocity).

b. At least once per 18 months by demonstrating:

(1) That the pressure drop across a HEPA filter is equal to or less than the maximum allowable pressure drop indicated in Figure 4.5.1.

(2) The inlet heater is capable of at least 10.9 KW input.

(3) Operation with a total flow within 10% of design flow.

c. At least once per 30 days on a STAGGERED TEST BASIS by operating each circuit for a minimum of 10 hours.

d. Anytime the HEPA filter bank or the charcoal absorbers have been partially or completely replaced, the test per 4.5.H.1.a (as applicable) will be performed prior to returning the system to OPERABLE STATUS.

e. Automatic initiation of each circuit every 18 months.

I. Inerting Surveillance

When an inert atmosphere is required in the primary containment, the oxygen concentration in the primary containment shall be checked at least weekly.

J. Drywell Coating Surveillance

Carbon steel test panels coated with Firebar D shall be placed inside the drywell near the reactor core midplane level. They shall be removed for visual observation and weight loss measurements during the first, second, fourth and eighth refueling outages.

K. Instrument Line Flow Check Valves Surveillance

The capability of instrument line flow check valves to isolate shall be demonstrated by testing a representative sample at least once per 24 months. In addition, each time an instrument line is returned to service after any condition which could have produced a pressure flow disturbance in that line, the open position of the flow check valve in that line shall be verified. Such conditions include: