Docket No. 50-219

MAR 31 1986

Mr. P. B. Fiedler
Vice President and Director
Oyster Creek Nuclear Generating Station
Post Office Box 388
Forked River, New Jersey 08731

Dear Mr. Fiedler:

SUBJECT: MECHANICAL AND HYDRAULIC SNUBBERS TECHNICAL SPECIFICATIONS (TAC 8439, 8440, TSCR 100)

Re: Oyster Creek Nuclear Generating Station

The Commission has issued the enclosed Amendment No. 100 to Provisional Operating License No. DPR-16 for the Oyster Creek Nuclear Generating Station. This amendment is in response to your application dated December 10, 1982, and April 15, 1985 as superseded November 13, 1985.

This amendment authorizes changes to the Appendix A Technical Specifications (TS) pertaining to mechanical and hydraulic snubbers. These changes are to Section 3.5 and 4.5, Containment, and to Section 6.10.2, Administrative Controls - Record Retention, and the Bases for these sections in the TS.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notices.

Sincerely,

John A. Zwolinski, Director
BWR Project Directorate #1
Division of BWR Licensing

Enclosures:
1. Amendment No. 100 to License No. DPR-16
2. Safety Evaluation

cc w/enclosures:
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 31, 1986

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Vice President and Director
Oyster Creek Nuclear Generating Station
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John A. Zwolinski, Director
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UNITED STATE
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

GPU NUCLEAR CORPORATION

AND

JERSEY CENTRAL POWER & LIGHT COMPANY

DOCKET NO. 50-219

OYSTER CREEK NUCLEAR GENERATING STATION

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 100
License No. DPR-16

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by GPU Nuclear Corporation and Jersey Central Power and Light Company (the licensees) dated November 13, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 2.C.(2) of Provisional Operating License No. DPR-16 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendices A and B, as revised through Amendment No.100, are hereby incorporated in the license. GPU Nuclear Corporation shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

John A. Zwolinski, Director
BWR Project Directorate #1
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 31, 1986

ATTACHMENT TO LICENSE AMENDMENT NO.100

PROVISIONAL OPERATING LICENSE NO. DPR-16

DOCKET NO. 50-219

Revise Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the captioned amendment number and contain vertical lines indicating the area of change.

REMOVE	INSERT
3.5-3	3.5-3
3.5-5	3.5-5
3.5-6	3.5-6
3.5-8 to	3.5-8
3.5-13	-
3.5-13a	3.5-9
4.5-6a	4.5-6a
4.5-6a-1	4.5-6a-1 to
-	4.5-6a-3
4.5-9b	4.5-9b
6-23	6-23

b. Two of the fourteen suppression chamber - drywell vacuum breakers may be inoperable provided that they are secured in the closed position.

c. One position alarm circuit for each operable vacuum breaker may be inoperable for up to 15 days provided that each operable suppression chamber - drywell vacuum breaker with one defective alarm circuit is physically verified to be closed immediately and daily during this period.

6. After completion of the startup test program and demonstration of plant electrical output, the primary containment atmosphere shall be reduced to less than 4.0% O_2 with nitrogen gas within 24 hours after the reactor mode selector switch is placed in the run mode. Primary containment deinerting may commence 24 hours prior to a scheduled shutdown.

7. If specifications 3.5.A.1.a, b, c(1) and 3.5.A.2 through 3.5.A.5 cannot be met, reactor shutdown shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours.

8. Shock Suppressors (Snubbers)

a. All safety related snubbers are required to be operable whenever the systems they protect are required to be operable except as noted in 3.5.A.8.b and c below.

b. With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to operable status.

c. If the requirements of 3.5.A.8.a and 3.5.A.8.b cannot be met, declare the protected system inoperable and follow the appropriate action statement for that system.

d. An engineering evaluation shall be performed to determine if the components protected by the snubber(s) were adversely affected by the inoperability of the snubber prior to returning the system to operable status.

importantly, the accessibility of the valve lever arm and position reference external to the valve. The fail-safe feature of the alarm circuits assures operator attention if a line fault occurs.

Conservative estimates of the hydrogen produced, consistent with the core cooling system provided, show that the hydrogen air mixture resulting from a loss-of-coolant accident is considerably below the flammability limit and hence it cannot burn, and inerting would not be needed. However, inerting of the primary containment was included in the proposed design and operation. The 5% oxygen limit is the oxygen concentration limit stated by the American Gas Association for hydrogen-oxygen mixtures below which combustion will not occur.[4] The 4% oxygen limit was established by analysis of the Generation and Mitigation of Combustible Gas Mixtures in Inerted BWR Mark I Containments.[12]

To preclude the possibility of starting up the reactor and operating a long period of time with a significant leak in the primary system, leak checks must be made when the system is at or near rated temperature and pressure. It has been shown[9][10] that an acceptable margin with respect to flammability exists without containment inerting. Inerting the primary containment provides additional margin to that already considered acceptable. Therefore, permitting access to the drywell for the purpose of leak checking would not reduce the margin of safety below that considered adequate and is judged prudent in terms of the added plant safety offered by the opportunity for leak inspection. The 24-hour time to provide inerting is judged to be a reasonable time to perform the operation and establish the required O_2 limit.

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic or other event, initiating dynamic loads. It is, therefore, required that all snubbers required to protect the primary coolant system or any other safety system or component be operable whenever the systems they protect are required to be operable.

The purpose of an engineering evaluation is to determine if the components protected by the snubber were adversely affected by the inoperability of the snubber. This ensures that the protected component remains capable of meeting the designed service. A documented visual field inspection will usually be sufficient to determine system operability.

Because snubber protection is required only during low probability events, a period of 72 hours is allowed for repairs or replacements.

Secondary containment[5] is designed to minimize any ground level release of radioactive materials which might result from a serious accident. The reactor building provides secondary containment during reactor operation when the drywell is sealed and in service and provides primary containment when the reactor is shutdown and the drywell is open, as during refueling. Because the secondary containment is an integral part of the overall containment system, it is required at all times that primary containment is required. Moreover, secondary containment is required during fuel handling operations and whenever work is being performed on the reactor or its connected systems in the reactor building since their operation could result in inadvertent release of radioactive material.

Table 3.5-1

(Deleted)

TABLE 3.5.2

CONTAINMENT ISOLATION VALVES

VALVE FUNCTION/VALVE DESIGNATION	ISOLATION SIGNALS
Main Steam Isolation Valves (NS03A, NS03B, NS04A, NS04B)	1
Main Steam Condensate Drain Valves (V-1-106, V-1-107, V-1-110, V-1-111)	1
Reactor Building Closed Cooling Valves (V-5-147, V-5-166, V-5-167)	2
Instrument Air Valve (V-6-395)	1
Emergency Condenser Vent Valves (V-14-1, V-14-5, V-14-19, V-14-20)	1
Reactor Cleanup Valves (V-16-1, V-16-2, V-16-14, V-16-61)	3
Shutdown Cooling Valves (V-17-19, V-17-54)	3
Drywell Equipment Drain Tank Valves (V-22-1, V-22-2)	3
Drywell Sump Valves (V-22-28, V-22-29)	3
Drywell & Torus Atmosphere Control Valves (V-27-1, V-27-2, V-27-3, V-27-4, V-28-17, V-28-18, V-23-21, V-23-22, V-28-47, V-23-13, V-23-14, V-23-15, V-23-16, V-23-17, V-23-18, V-23-19, V-23-20)	3
Reactor Recirculation Loop Sample Valves (V-24-29, V-24-30)	1
Torus to Reactor Building Vacuum Relief Valves (V-26-16, V-26-18)	3*
Traversing In-Core Probe System (Tip machine ball valve No. 1, No. 2, No. 3, No. 4)	3

1)Reactor Isolation Signals as shown in Table 3.1.1
2)Low-Low Reactor Water Level and High Drywell Pressure; or Low-Low-Low Reactor Water Level.
3)Primary Containment Isolation Signals as shown in Table 3.1.1

*Valves automatically reset to provide vacuum relief

P. Suppression Chamber Surveillance

1. At least once per day the suppression chamber water level and temperature and pressure suppression system pressure shall be checked.

2. A visual inspection of the suppression chamber interior, including water line regions, shall be made at each major refueling outage.

3. Whenever heat from relief valve operation is being added to the suppression pool, the pool temperature shall be continually monitored and also observed until the heat addition is terminated.

4. Whenever operation of a relief valve is indicated and the suppression pool temperature reaches 160°F or above while the reactor primary coolant system pressure is greater than 180 psig, an external visual examination of the suppression chamber shall be made before resuming normal power operation.

Q. Shock Suppressors (Snubbers)

1. Each snubber shall be demonstrated operable by performance of the following inspection program.

a. Visual Inspections

All snubbers shall be visually inspected in accordance with the following schedule:

No. Inoperable Snubbers Per Inspection Period	Subsequent Visual Inspection Period*
0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3,4	124 days ± 25%
5,6,7	62 days ± 25%
8 or more	31 days ± 25%

* The provisions of Technical Specification 1.24 are not applicable.

The required inspection interval shall not be lengthened more than one step at a time. The snubbers may be categorized into two groups: those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that the affected snubber is functionally tested in the as found condition and determined operable per Specification 4.5.Q.d or 4.5.Q.e as applicable and that the cause for the rejection has been clearly established and remedied for that particular snubber.

c. Functional Tests

At least once each refueling cycle, a representative sample (10% of the total of each type of snubber in use in the plant) shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.5.Q.d or 4.5.Q.e, an additional 10% of that type of snubber shall be functionally tested. As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, mechanical or hydraulic.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle.

2. Snubbers within 5 feet of heavy equipment (valve, pump, motor, etc.).

3. Snubbers within 10 feet of the discharge from a safety relief valve.

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed (if it is repaired and installed in another position) and the replacement snubber shall be retested. The results from testing of these snubbers are not to be included for determining additional sampling requirements.

For any snubber that fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated. If caused by manufacturer or design deficiency, actions shall be taken to ensure that all snubbers of the same design are not subject to the same defect.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that:

1. The force that initiates free movement of the snubber rod in either tension or compression is less than the specified maximum drag force.

2. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

3. Snubber release rate, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

f. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.1.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records. Service life shall not at any time affect reactor operations.

of the system. Althougn this is basically a leak test, since the filters have charcoal of known efficiency and holding capacity for elemental iodine and/or methyl iodide, the test also gives an indication of the relative efficiency of the installed system. The test procedure is an adaptation of test procedures developed at the Savannan River Laboratory which were described in the Ninth AEC Air Cleaning Conference.*

High efficiency particulate filters are installed before and after the charcoal filters to minimize potential release of particulates to the environment and to prevent clogging of the iodine filters. An efficiency of 99% is adequate to retain particulates that may be released to the reactor building following an accident. This will be demonstrated by testing witn DOP as testing medium.

If laboratory tests for the adsorber material in one circuit of the Standby Gas Treatment System are unacceptable, all adsorber material in that circuit shall be replaced with adsorbent qualified according to Regulatory Guide 1.52. Any HEPA filters found defective shall be replaced with tnose qualified with Regulatory Position C.3.d of Regulatory Guide 1.52.

The snubber inspection frequency is based upon maintaining a constant level of snubber protection. Thus, the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for the next required inspection. Visual Inspections performed before an inspection interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To further increase the assurance of snubber reliability, functional tests should be performed at least once each refueling outage. These tests will include stroking of the snubbers to verify proper piston movement, lock-up and bleed. Ten percent of the snubbers represents an adequate sample for such tests. Observed failures of these samples require testing of additional units.

*D. R. Muhbaier, "In Place Nondestructive Leak Test for Iodine Adsorbers", Proceedings of the Ninth AEC Air Cleaning Conference, USAEC Report CONF-660904, 1966.

6.10.2

The following records shall be retained for the duration of the Facility Operating License:

a. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

c. Records of facility radiation and contamination surveys.

d. Records of radiation exposure for all individuals entering radiation control areas.

e. Records of gaseous and liquid radioactive material released to the environs.

f. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.

g. Records of training and qualification for current members of the plant staff.

h. Records of inservice inspections performed pursuant to these technical specificatons.

i. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

j. Records of reviews by the Independent Onsite Safety Review Group.

k. Records for Environmental Qualification which are covered under the provisions of paragraph 6.14.

l. Records of the service lives of all snubbers, including the date at which the service life commences, and associated installation and maintenance records.

6.10.3 Quality Assurance Records shall be retained as specified by the Quality Assurance Plan.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 (Deleted)

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 100 TO PROVISIONAL OPERATING LICENSE NO. DPR-16

GPU NUCLEAR CORPORATION AND

JERSEY CENTRAL POWER & LIGHT COMPANY

OYSTER CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-219

1.0 INTRODUCTION

By letters dated December 10, 1982, and April 15, 1985 as superseded November 13, 1985, GPU Nuclear (the licensee) has requested an amendment to Provisional Operating License No. DPR-16 for Oyster Creek Nuclear Generating Station (Oyster Creek). This amendment would authorize changes to the Appendix A Technical Specifications (TS) pertaining to mechanical and hydraulic snubbers. These changes are to Section 3.5 and 4.5, Containment, and to Section 6.10.2, Administrative Controls - Record Retention, and the Bases for these sections in the TS.

2.0 DISCUSSION AND EVALUATION

Operating experiences, advances in the state-of-the-art, voids in some specific requirements, and non-uniform interpretations indicated the need for changes, clarifications, and improvements in the Boiling Water Reactor Standard Technical Specifications (STS) for inservice operability and surveillance requirements for snubbers. To reflect accumulated experience obtained in the past several years, the NRC staff issued Revision I of the snubber STS. By NRC Generic Letters dated November 20, 1980 to power reactor licensees (except SEP licensees) and March 23, 1981 to SEP licensees, the NRC requested all licensees to incorporate the requirements of this revision into their plant-specific TS.

The revised STS included:

- Addition of mechanical snubbers to the surveillance program;
- Deletion of the blanket exemption for testing of greater than 50,000 lb. rated capacity snubbers. (Snubbers of greater than 50,000 lb. capacity are now included in the testing program);
- Deletion of the requirement that seal material receive NRC approval;
- Clarification of test requirements;
- Provision for in-place testing; and
- Addition of a service life monitoring program.

Recently the NRC staff reassessed the inclusion of snubber listings within the TS and concluded such listings are not necessary provided the snubber TS is modified to specify which snubbers are required to be operable and plant records containing the appropriate snubber data are maintained. By NRC Generic Letter 84-13 dated May 3, 1984 to power reactor licensees (except SEP licensees) and to all applicants for licenses to operate power reactors, the NRC advised that licensees may choose to request a license amendment to delete the tabular listing of snubbers from its TS. By NRC letter dated July 31, 1984, Generic Letter 84-13 was also made applicable to all SEP licensees.

In response to the initial NRC request, by letter dated December 10, 1982, the licensee submitted an application for license amendment and proposed TS changes for operability and surveillance requirements for snubbers. By letter dated April 15, 1985, the licensee responded to the NRC Generic letter 84-13, and submitted Revision 1 requesting deletion of snubber tables from its proposed snubber TS.

During an NRC Region I inspection of the plant on August 19-23, 1985, the licensee's submittal was reviewed and compared with the model STS, and clarification was obtained in several areas where there were differences between the licensee's submittal and the STS. (See Inspection Report No. 50-219/85-27 dated September 9, 1985). As a result of the staff's comparison review, the licensee by letter dated November 13, 1985, submitted Revision 2 of its proposed snubber TS. This safety evaluation is for the licensee's November 13, 1985 Revision 2 TS submittal.

3.0 EVALUATION

The staff has evaluated the licensee's snubber TS submittal and has determined it to be in agreement with the intent of the STS. The snubbers STS apply to Oyster Creek. The licensee's proposed snubber operability and surveillance requirements have done the following: defined testing and acceptance criteria, included mechanical snubbers, removed the exemption for testing snubbers greater than 50,000 lb. capacity, and included a service life monitoring program.

During the evaluation, the staff recognized that the licensee's TS are in a custom format (not STS format). The proposed snubber TS are consistent with the existing TS format. The staff also recognized that there can be circumstances where a plant-specific approach is warranted. Several specifics of this evaluation are addressed below.

TS Snubber Tables

The licensee's Table listing of snubbers has been deleted from the proposed snubber TS based on the NRC Generic letter 84-13 guidance.

The staff has reviewed the licensee's submittal and has determined that the snubber TS include service life monitoring, record keeping requirements, and specifies the snubbers required to be operable as stated in the NRC Generic Letter, therefore, the staff finds the licensee's proposed snubber Table deletion acceptable.

Functional Test Frequency

The licensee's proposed TS defines functional testing to be performed once each refueling cycle instead of refueling outage. The licensee has stated that the removal of one accessible snubber, and testing and replacing it on a one-at-a-time (another snubber not removed until the first is replaced) planned basis prior to shutdown provides the licensee latitude to avoid snubber testing becoming the critical path for the planned shutdown work. The licensee stated that it has been following this process with its existing TS and when any snubber is removed the snubber is declared inoperable and the appropriate action statements followed.

The staff has reviewed the licensee's TS and the conditions under which the functional testing of a snubber during operation is to be performed. The staff has determined that the licensee's present and proposed system of being able to remove and functionally test one snubber at a time during the refueling cycle time period while staying within the limiting condition for operation action statements is consistent with staff policy regarding voluntary entry into TS action statements. Therefore, the staff finds the licensee's proposed functional testing during the refueling cycle to be acceptable.

Bases

The proposed changes to the Bases of the TS have been reviewed by the staff and found to be correct and, therefore, acceptable.

Conclusion

Based on the above, the staff finds that the licensee's proposed snubber TS are acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 CONCLUSION

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributor: H. Gregg.

Dated: March 31, 1986