



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

March 31, 1987

Docket No. 50-219

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: CONTROL ROOM HABITABILITY TECHNICAL SPECIFICATION (MPA B-83,
TAC 64125, TSCR 151)

Re: Oyster Creek Nuclear Generating Station

The Commission has issued the enclosed Amendment No. 115 to Provisional Operating License No. DPR-16 for the Oyster Creek Nuclear Generating Station. This amendment is in response to your application dated November 28, 1986.

This amendment authorizes limiting conditions for operation (LCO) and surveillance requirements pertaining to control room habitability to the Appendix A Technical Specifications (TS). It adds two new sections numbered 3.17 and 4.17, Control Room Heating, Ventilating and Air-Conditioning System, to the TS. Section 3.17 states when the control room heating, ventilating and air-conditioning (HVAC) system is required to be operable, the actions to be taken if it is determined to be inoperable and the basis for the requirements. Section 4.17 lists the surveillance tests to be made on the HVAC system, the frequency of these tests and the basis for the surveillance.

These TS were part of the NUREG-0737 TS requested by the staff in Generic Letter (GL) 83-36 dated November 1, 1983. The staff's evaluation on the licensee's response to GL 83-36 is in the staff's letter dated November 22, 1985. The staff also addressed control room habitability in its Safety Evaluations (SE) dated July 15 and November 14, 1986.

You are again requested to advise us of any changes in the implementation dates for meeting your control room habitability commitments and requirements. This includes the two long-term final modifications which were discussed in the staff's letter dated July 15, 1986, and are presently scheduled to be completed in the Cycle 12R outage in accordance with license condition 2.C(8).

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Mr. P. B. Fiedler

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March 31, 1987

As discussed in the enclosed SE, we request that you propose additional control room habitability TS on the maximum control room temperature and on plant shutdown if the control room HVAC system (except dampers) is inoperable for more than 7 days. The date to submit these TS may be negotiated with the NRC Project Manager. The Notice of Issuance will be included in the Commission's biweekly Federal Register notices.

Sincerely,

Original signed by

Marshall Grotenhuis, Acting Director
BWR Project Directorate #1
Division of BWR Licensing

Enclosures:

- 1. Amendment No. 115 to License No. DPR-16
- 2. Safety Evaluation

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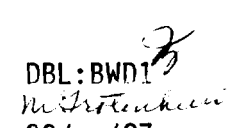
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Oyster Creek Nuclear Generating Station

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UNITED STATES
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. 115
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 28, 1986, 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.

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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.115 , 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



Marshall Grotenhuis, Acting Director
BWR Project Directorate #1
Division of BWR Licensing

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 31, 1987

ATTACHMENT TO LICENSE AMENDMENT NO. 115

PROVISIONAL OPERATING LICENSE NO. DPR-16

DOCKET NO. 50-219

Revise the 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.

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*Issued by NRC Order dated 10-24-80

3.17 Control Room Heating, Ventilating, and Air-Conditioning System

Applicability: Applies to the operability of the control room heating, ventilating, and air conditioning (HVAC) system.

Objective: To assure the capability of the control room HVAC system to minimize the amount of radioactivity from entering the control room in the event of an accident.

Specification:

- A. The control room HVAC system shall be operable during all modes of plant operation.
- B. With the control room HVAC system determined inoperable:
 - 1. Manually align the dampers for the partial recirculation mode of operation.
 - 2. Restore the system to operable status within 7 days or prepare and submit a special report to the Commission in lieu of any other report required by Section 6.9, within the next 14 days, outlining the action taken, the cause of the inoperability and the plans/schedule for restoring the HVAC system to operable status.

Basis: The operability of the control room HVAC system ensures that the control room will remain habitable for operations personnel during a postulated loss-of-coolant accident. If the system is found to be inoperable, there is no immediate threat to the control room. The control room personnel have time to manually align the dampers to minimize the air inflow to the control room envelope.

4.17 Control Room Heating, Ventilating, and Air-Conditioning System

Applicability: Applies to surveillance requirements for the control room heating, ventilating, and air conditioning (HVAC) system.

Objective: To verify the capability of the control room HVAC system to minimize the amount of radioactivity from entering the control room in the event of an accident.

Specification: The control room HVAC system shall be demonstrated operable:

- A. At least once monthly: by initiating, from the control room, the partial recirculation mode of operation, and by verifying that the system components are aligned such that the system is operating in this mode.
- B. At least once every refueling outage: by verifying that in the partial recirculation mode of operation, the control room and lower cable spreading room are maintained at a positive pressure of $\geq 1/8$ in. WG relative to the outside atmosphere with the total flow rate of makeup air plus infiltration air less than or equal to 2000 cfm.

Basis: Periodic surveillance of the control room HVAC system is required to ensure the operability of the system. The operability of the system in conjunction with control room design provisions is based upon limiting the radiation exposure to personnel occupying the control room to less than a 30-day integrated gamma dose of 5 rem, and a 30-day integrated beta dose of 30 rem.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 115 TO PROVISIONAL OPERATING LICENSE NO. DPR-16

GPU NUCLEAR CORPORATION AND

JERSEY CENTRAL POWER & LIGHT COMPANY

OYSTER CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-719

1.0 INTRODUCTION

By letter dated November 28, 1986, GPU Nuclear (the licensee) requested an amendment to Provisional Operating License No. DPR-16 for the Oyster Creek Nuclear Generating Station (Oyster Creek). This amendment would authorize limiting conditions for operation (LCO) and surveillance requirements pertaining to control room habitability to the Appendix A Technical Specifications (TS). It would add two new sections numbered 3.17 and 4.17, Control Room Heating, Ventilating and Air-Conditioning System, to the TS. Section 3.17 states when the control room heating, ventilating and air-conditioning (HVAC) system is required to be operable, the actions to be taken if it is determined to be inoperable and the basis for the requirements. Section 4.17 lists the surveillance tests to be made on the HVAC system, the frequency of these tests and the basis for the surveillance.

2.0 DISCUSSION

By a Confirmatory Order dated March 14, 1983, GPU Nuclear (GPUN) was required to have NUREG-0737, Item III.D.3.4, Control Room Habitability, fully implemented at the Oyster Creek Nuclear Generating Station (OCNGS) before the restart from the Cycle 11 refueling (Cycle 11R) outage. By TS Amendment 105 dated July 15, 1986, GPUN was granted a postponement of full implementation until the Cycle 12R outage provided that interim system upgrades and accident analyses were completed. These interim items have been completed with the final item being this application dated November 28, 1986, for TS changes on the control room HVAC system.

The licensee provided the following data on its control room habitability system for Oyster Creek in its application dated November 28, 1986:

The control room envelope consists of the control room panel area, the Shift Supervisor's office, toilet room, kitchen, and cable spreading rooms. Normal ventilation is provided by a system utilizing one supply fan with steam coils for heating and a three-stage refrigeration unit for cooling. The ability to recirculate air is provided, with recirculation varying from 0 to 100

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percent. A purge mode is provided for operation with 100 percent outside air to prevent the recirculation of smoke in the Control Room and to clear the area of smoke and fumes.

The system is normally operated to maintain room air at 75 degrees F. Under normal operation of the turbine generator unit, the system cools during winter and summer. Heat to maintain 70 degrees F in these areas is anticipated to be required only during the winter when the turbine generator is not operating. Major components of the system are the air conditioning unit and the two heating coils. The system does not include filters to reduce the intake of radioactivity.

Upon the receipt of a loss of coolant accident (LOCA) or high containment radiation signal in the control room, the operators will switch the control room HVAC system to the partial recirculation mode of operation. For this mode of operation, the control room pressure envelope is held at a minimum of 1/8 inch water gauge positive pressure, and the total measured makeup plus infiltration air flow is 1830 cfm.

The radiological analyses previously submitted by the licensee in a letter dated June 17, 1985, to the staff were based on the original design of the control room HVAC system. The licensee stated that the intent of the original system design was to provide a minimum of 450 cfm infiltration for pressurization and air replacement purposes rather than restrict the infiltration to a maximum of 450 cfm. The three airborne fission product release paths considered were Main Steam Isolation Valve Bypass Leakage, Containment Leakage and Engineered Safety Features Leakage. Since the NRC staff is presently reviewing the iodine source term for the design basis LOCA accident, the analyses were restricted to whole body and beta skin doses from noble gases.

The calculations were revised by the licensee to determine the effect of higher infiltration rates on the 30-day gamma whole-body and beta skin doses to the operators. The results are presented below:

Flow Rate (cfm)	30 day dose (REM)	
	Gamma	Beta
1500	3.05	27.9
2000	3.07	28.2

Although the infiltration rate had increased by as much as a factor of 4, the doses did not increase in the same proportion. The reason for this is that when the infiltration rate is increased, the exfiltration from the control room envelope increased at the same rate, thereby having only a small effect on the isotopic concentrations in the control room at any time over the 30 day period. The revised concentrations produced higher doses to the operators; however, all the doses were less than the Standard Review Plan (SRP) 6.4 limits of 5 rem and 30 rem for gamma and beta doses respectively. Also, the

radiological analysis did not rely on the use of goggles or protective clothing to meet the General Design Criterion (GDC) 19 beta skin dose guidelines, a commitment for the Cycle 12 Refueling outage. Therefore, the control room was determined radiologically habitable for 30 days following a design basis LOCA.

Because the control room HVAC system has no filters to reduce the radioactivity following a LOCA, the loss of the control room HVAC does not change the analysis for meeting the GDC 19 criteria on radiation exposure. The licensee stated that the control room operators have time to manually close dampers to isolate the control room and to provide heating or cooling to the control room from other sources, if needed, so that the proposed action does not significantly increase the consequences of a previously evaluated accident or create a new or different kind of accident.

The effects of natural phenomena in the control room were excluded from the issue of Control Room Habitability. These effects are being addressed in the Systematic Evaluation Program (SEP) in the following active reviews: tornado missiles, SEP Topic III-4.A; seismic design considerations, SEP topic III-6; wind and tornado loadings, SEP Topic III-2; and flooding potential and protective requirements, SEP Topic II-3.B. These reviews are discussed in the staff's Integrated Plant Safety Assessment Report for Oyster Creek, NUREG-0822, dated January 1983.

3.0 EVALUATION

3.1 Discussion

In TS Amendment No. 105 dated July 15, 1986, on Control Room Habitability, and in TS Amendment No. 94 dated November 22, 1985, on NUREG-0737 Technical Specifications (Generic Letter 83-36), the staff requested the licensee to submit TS on control room habitability for Oyster Creek. The staff stated in its letters that acceptable TS were attached to Generic Letter 83-36 dated November 1, 1983.

In its application, the licensee proposed the following TS: (1) the control room HVAC system shall be operable during all modes of plant operation, (2) with the HVAC system inoperable, align the dampers for partial recirculation operation and restore the system to operability within 7 days or submit a special report to NPC, (3) demonstrate partial recirculation operation of the HVAC system monthly, (4) demonstrate once every refueling outage that the pressure in the control room can be maintained 1/8 inch water gauge at a inflow rate less than or equal to 2000 cfm, and (5) add the new TS Sections 3.17 and 4.17 to the Table of Contents.

The TS proposed by the licensee have differences from the TS in GL 83-36. The differences are that GL 83-36 requested TS on (1) the chlorine detection system, (2) the control room emergency filtration system, (3) the control room maximum temperature, and (4) the plant being shut down if the control room habitability system is operable for more than 7 days.

3.2 Evaluation

The staff addressed the need for TS on the chlorine detection system in its evaluation, on the results of HVAC system tests for control room habitability, dated November 14, 1986. The staff concluded that these TS were not needed because plant procedures were sufficient to protect control room operators until the chlorine tanks are removed from the site in the Spring of 1987. In the meeting of February 3, 1987, the licensee explained that the chlorine tanks have been removed from the site. The NRC Project Manager observed that the tanks have been removed from the chlorination facility in a tour of site.

In the description of the control room HVAC in the Section 2.0 above the licensee explained that the control room did not have filters to reduce the intake of radioactivity. This was addressed by the staff in its evaluation for Amendment No. 105 dated July 15, 1986. The staff concluded in this amendment that the licensee's dose estimates were reasonable and within the GDC 19 radiation exposure guidelines and, therefore, acceptable. Hence, the staff concluded that the Oyster Creek control room met the radiation habitability requirements with respect to design basis radiation releases without filtration. The thyroid doses from iodine releases were deferred until the source term reevaluation by the Commission is completed and its results are made available. The licensee's radiological analysis also did not require the control room operators to wear goggles and protective clothing to have the operators' beta skin dose within the GDC 19 guidelines. Therefore, the staff is in agreement with the licensee that TS on filtration are not needed.

The licensee did not provide a justification for not submitting TS on the control room maximum temperature. This would require monitoring the temperature to determine that it does not exceed the value that the electrical equipment important to safety in the control room is qualified for. The licensee will be requested to propose TS on this temperature or provide justification for not needing this TS. The control room HVAC's ability to control the control room temperature below this maximum value would then become part of its definition of being operable. Acceptable TS are attached to GL 83-36.

The licensee proposed TS that require, if the control room HVAC is inoperable, the following: (1) manually align the dampers for the partial recirculation mode of operation and (2) restore the system to operable status within 7 days or submit a special report to the Commission. This report would outline the actions taken by the licensee, the cause of the inoperability, and the licensee's plans/schedules to restore the system. This type of report is similar to special reports requested by the staff on certain post-accident monitoring instrumentation in the TS attached to GL 83-36.

The basis for requiring the control room to be in the partial recirculation mode of operation is in the staff's safety evaluation dated November 14, 1986. In its letter dated September 29, 1986, the licensee provided the results of the control room ventilation system tests. The licensee determined the most limiting infiltration rates which would apply to the chlorine and radiological release scenarios. A test was conducted to demonstrate the capability of the control room ventilation system to maintain a minimum positive pressure of 1/8 inch water gauge in the control room pressure envelope, and to determine the infiltration flow rates. This test was conducted with the system in the partial and full recirculation modes of operation. In the full recirculation mode of operation (chlorine release) the infiltration rate was measured to be slightly less than 960 cfm. For the partial recirculation mode of operation (LOCA radiological release), the total measured makeup plus infiltration air flow was 1830 cfm. Therefore, if the dampers are inoperable, they should be aligned in the partial recirculation mode of operation as required by the proposed TS. The lack of chlorine tanks onsite means the control room dampers do not have to be aligned in the full recirculation mode.

The TS on control room habitability in GL 83-36 and BWR Standard Technical Specifications (STS), NUREG-0123, Revision 3, require the licensee to shut down the plant if the control room habitability system is inoperable for more than 7 days. The staff has concluded that control room habitability for the operators is sufficiently important to warrant not allowing the plant to operate more than 7 days without the control room habitability system being operable. This 7 days is consistent with the inoperability of similar important safety systems. The special report to the Commission after 7 days is acceptable but does not go far enough. The licensee will be requested to propose TS to shut down the plant if the control room habitability system is inoperable for more than 7 days or provide sufficient justification that this TS is not required for Oyster Creek.

The control room habitability system for the GL 83-36 TS and the BWR STS is the control room emergency filtration system which has filters. The control room habitability system for Oyster Creek is the control room HVAC which does not have filters. This is discussed above concerning the acceptability of this system. Although this system has no filters, it protects the operators by aligning the dampers and maintaining the air inflow to have the control room pressure at or above an 1/8 inch water gauge with respect to the outside. Therefore, if the control room HVAC cannot do this, the system should be declared inoperable and, if the system cannot be restored to operable status in 7 days, the plant is shut down. Because the proposed TS require the dampers to be aligned in the partial recirculation mode if the system is inoperable, the operable status would depend only on the system's ability to maintain inflow such that the control room pressure is at or above the 1/8 inch water gauge.

The licensee tested its control room HVAC to determine the air inflow needed to maintain an acceptable positive pressure in the control room (i.e., 1/8 inch water gauge). The test for the partial recirculation determined an air inflow of 1830 cfm. This was reported in the licensee's letter dated September 29, 1986, and discussed above. In this letter, the licensee stated that, for the 1830 cfm and a higher inflow of 2000 cfm, the calculated doses to the

operators was within the acceptable limits of GDC 19 and SRP 6.4 for gamma whole body and beta skin doses. This is for 30 days exposure to the operators for the design basis LOCA. The 1830 cfm air inflow was accepted by the staff in its evaluation dated November 14, 1986. The staff concludes the 2000 cfm is also acceptable on the same basis that the staff accepted the 1830 cfm. The licensee was using a calculation model approved by the staff in its evaluation dated July 15, 1986.

Therefore, acceptable air inflows during the partial recirculation mode of operation are up to 2000 cfm. Based on this, the proposed TS on testing the control room pressure at flow rates up to 2000 cfm is acceptable. The licensee has shown that flow rates up to 2000 cfm will result in doses to the control room operators during the design basis LOCA which are acceptable.

3.3 Conclusion

The staff has evaluated the TS proposed by the licensee in its application dated November 28, 1986. The proposed TS are consistent with the TS attached to GL 83-36 except for four differences discussed in Section 3.1. The differences between the proposed TS and the TS in GL 83-36 are acceptable because the staff has previously concluded the licensee's position is acceptable in the staff's evaluations dated July 15 and November 14, 1986 or the licensee is requested to proposed additional TS. These additional TS are on (1) control room maximum temperature and (2) plant shutdown if the control room HVAC (except the dampers) is inoperable, for air inflow or for control room temperature, for more than 7 days. The Bases for Sections 3.17 and 4.17 have been evaluated and are considered correct. The addition of the two new TS Sections 3.17 and 4.17 to the Table of Contents is an administrative change and is correct. Therefore, the staff concludes that the proposed amendment to the TS is 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 a change 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.

6.0 REFERENCES

1. Generic Letter 83-36, NUREG-0737 Technical Specifications, November 1, 1983.
2. Letter from J. Donohew (NRC) to P. B. Fiedler (GPUN), Amendment 105, Control Room Habitability, July 15, 1986.
3. Letter P. B. Fiedler (GPUN) to J. A. Zwolinski (NRC), Results of Control Room HVAC System Test, September 29, 1986.
4. Letter from J. Donohew (NRC) to P. B. Fiedler (GPUN), Results of HVAC System Test for Control Room Habitability, November 14, 1986.
5. Letter from P. B. Fiedler (GPUN) to J. A. Zwolinski (NRC), TSCR 151, November 28, 1986.

Principal Contributor: J. Donohew

Dated: March 31, 1987