

As the safety valves present distinctly different concerns than those related to relief valves, the technical specifications are separated as to the actions taken upon inoperability. Clearly, the actuation of a safety valve will be immediately detectable by observed increase in drywell pressure. Further confirmation can be gained by observing reactor pressure and water level. Operator action in response to these symptoms would be taken regardless of the acoustic monitoring system status. Acoustic monitors act only to confirm the reseating of the safety valve. In actuality, the operator actions in response to the lifting of a safety valve will not change whether or not the safety valve reseats. Therefore, the actions taken for inoperable acoustic monitors on safety valves are significantly less stringent than that taken for those monitors associated with relief valves.

Should an acoustic monitor on a safety valve become inoperable, the setpoint on an adjacent monitor, if operable, will be reduced to assure alarm actuation should the safety valve lift. When a reduced setpoint results in having the acoustic monitor on an adjacent valve in an alarm condition due to background noise, the setpoint may be returned to normal. This will ensure that the adjacent valve's acoustic monitor remains operable. Analyses, using very conservative blowdown forces and attenuation factors, show that reducing the alarm setpoint on adjacent monitors to less than 1.4g will assure alarm actuation should the adjacent safety valve lift. Minimum blowdown force considered was 30g with a maximum attenuation of 27dB. In actuality, a safety valve lift would result in considerably larger blowdown force. The maximum attenuation of 27dB was determined based on actual testing of a similar monitoring system installed in a similar configuration.

The operability of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables during and following an accident. The capability is consistent with NUREGs 0578 and 0737.

The capability is provided to detect and measure concentrations of noble gas fission products in (1) plant gaseous effluents and (2) in containment during and following an accident. For the plant gaseous effluent capability, two Radioactive Gaseous Effluent Monitoring Systems (RAGEMS) are installed at Oyster Creek. One system monitors releases at the main stack (RAGEMS I) and the other monitors the turbine building vents (RAGEMS II). For the in containment post-accident capability, two high range radiation monitors are installed in the drywell. These monitors augment the capabilities provided by the Offsite Thermoluminescent Dosimeter Program (Emergency Plan Section 7.5.2.2b).

6.17 Deleted

6.18 PROCESS CONTROL PLAN

- a. Licensee initiated changes to the PCP:
 - 1. Shall be submitted to the NRC in the Annual Radioactive Effluent Release Report for the period in which the changes were made. This submittal shall contain:
 - a. sufficiently detailed information to justify the changes without benefit of additional or supplemental information;
 - b. a determination that the changes did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. documentation that the changes have been reviewed and approved pursuant to Section 6.8.2.
 - 2. Shall become effective upon review and approval by licensee management.

6.19 OFFSITE DOSE CALCULATION MANUAL

- a. The ODCM shall be approved by the Commission prior to implementation.
- b. Licensee initiated changes to the ODCM shall be submitted to the NRC in the Annual Radioactive Effluent Release Report for the period in which the changes were made. This submittal shall contain:
 - 1. sufficiently detailed information to justify the changes without benefit of additional or supplemental information;
 - 2. a determination that the changes did not reduce the accuracy or reliability of dose calculations or setpoint determination; and,
 - 3. documentation that the changes have been reviewed and approved pursuant to Section 6.8.2.
- c. Change(s) shall become effective upon review and approval by licensee management.