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C321-94-2081
June 3, 1994

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Facility Operating License No. DPR-16
ASME Code System Hydrostatic Pressure Testing

- References: (1) JCP&L Letter, "Technical Specification Change Request No. 75", dated November 16, 1979.
- (2) NRC Letter, "Safety Evaluation Supporting Amendment No. 44", dated January 4, 1980.

As a result of an internal review, GPU Nuclear has discovered an error in Technical Specification Change Request (TSCR) No. 75 which formed part of the basis for NRC approval of Amendment No. 44 to the Oyster Creek Operating License. An error was discovered in the following statement.

"...during the system hydrostatic pressure test required by ASME Code Section XI, IS-500, at or near the end of each ten year inspection interval...Over-pressure protection would continue to be provided by the safety valves."

This statement was later incorporated in the NRC Safety Evaluation Report as follows:

"The licensee has also proposed to allow the pressure relief function of the electromatic relief valves to be inoperable or bypassed (the ADS function of the valves would be maintained) during the system hydrostatic pressure test required by ASME Code Section XI, IS-500 at or near the end of each ten year inspection interval. This allowance is necessary since the hydrostatic test pressure is above the setpoint of the relief valves.

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Even though the pressure relief function of the electromatic relief valves is bypassed, overpressure protection would continue to be provided by the 16 safety valves. Elimination of this relief function does not affect the reactor safety analysis, since credit was not taken for the relief function. Therefore, we find this modification acceptable."

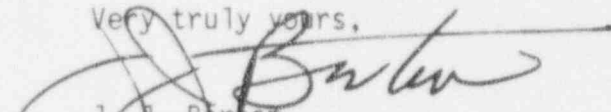
The statement "over pressure protection would continue to be provided by the safety valves" is in error since procedurally the code safety valves are gagged to prevent weeping during system hydrostatic testing.

Specifically, when performing the ASME Code system hydrostatic pressure tests, it is Oyster Creek's procedure to gag the code safety valves prior to exceeding 970 psig. Four of the Electromatic Relief Valves (EMRV) are recalibrated to a opening pressure of 1230 psig with the remaining EMRV placed in the "OFF" position. If the Reactor Vessel begins to pressurize rapidly, overpressure is controlled by securing the operating Control Rod Drive (CRD) pump with depressurization achieved by letting down to the Clean-Up system. If pressure increases to 1190 psig, the EMRV in "OFF" is switched to "MAN" (the EMRV opens) to relieve pressure. Since the CRD pump capacity is approximately 110 GPM, one EMRV is more than sufficient to relieve pressure due to a running CRD pump. Therefore the error regarding safety valves providing overpressure protection has no significant implication for public health and safety.

However, since overpressure protection is not provided by the safety valves during the ASME Code system hydrostatic pressure tests, documentation of acceptance of this clarification to the referenced TSCR and NRC Safety Evaluation Report is requested.

If you have any questions or comments on this submittal, please contact Mr. George Busch, Manager, Oyster Creek Licensing at (609) 971-4643.

Very truly yours,



J. J. Barton
Vice President and Director
Oyster Creek

cc: Administrator, Region 1
Senior Resident Inspector
Oyster Creek NRC Project Manager