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Writer's Direct Dial Number:

February 18, 1983

Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

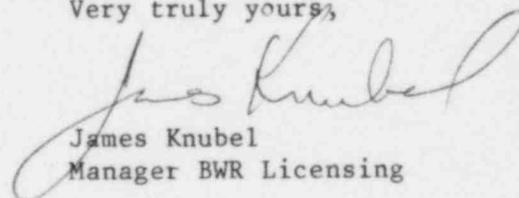
Dear Mr. Crutchfield:

SUBJECT: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Nureg 0737, Item II.F.1

Attachment #1 to this letter provides justification for the Oyster Creek Schedule for completing NUREG 0737, Item II.F.1, "Additional Accident-Monitoring Instrumentation". It should be noted that Oyster Creek is presently in a Refueling Outage and plans to complete five of the six modifications required prior to startup. The last modification (Containment Hi Range Monitor) will be completed during the next refueling outage.

If you have any further questions, please contact me at (201) 299-2264.

Very truly yours,



James Knubel
Manager BWR Licensing

JK:blf
Attachment

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ATTACHMENT #1

NUREG ITEM	REASON FOR DELAY	COMPENSATORY MEASURES
1. II.F.1.1 Noble Gas Effluent Monitor	Final accomplishment of this item can only be accomplished during a refueling outage. The current refueling outage which began on February 12, 1983 is the first available outage of sufficient duration which has occurred since the issuance of Nureg 0737.	There presently exists noble gas effluent monitors, however, these monitors do not meet the range requirements specified by Nureg 0737. It is felt that these monitors would be acceptable for all but the most severe accidents in which case Emergency Response recommendations to local agencies would be based upon Plant Parameters (i.e., reactor water level, containment pressure, Plant area radiation levels, etc.) and the input from offsite monitoring teams.
2. II.F.1.2 Continuous sampling of Plant effluent	SAME AS #1	The presently exists charcoal filters in the stack gas monitoring system. However, for a severe accident they would not be accessible due to high radiation levels. It has been concluded that recommendations to local agencies could be accomplished based upon plant parameters and input from offsite monitoring teams.
3. Containment Hi- Range Monitor II.F.1.3	Final accomplishment of this will be in the next scheduled refueling outage which is currently anticipated to occur in 1985. This is felt to be justified based upon the large number of other parameters inside containment that will provide indication of a major accident.	The following instrumentation which is presently installed or will be installed prior to operation in cycle 10 will provide diverse indication of a severe accident: <ul style="list-style-type: none"> a. Reactor water level <ul style="list-style-type: none"> i) 1o-1o water level ii) 1o-1o-1o water level iii) Reactor fuel zone monitor b. Containment Pressure c. Torus Water level d. Drywell Oxygen Concentration e. Drywell Hydrogen Concentration f. Containment Particulate Monitor g. Core Spray initiation h. Containment Temperature Monitor i. Containment Spray Initiation

NUREG ITEM	REASON FOR DELAY	COMPENSATORY MEASURES
4. Containment Pressure II.F.1.4	SAME AS # 1	There presently exists instrumentation to monitor this parameters, however, it does not have the range required by Nureg 0737. Other indications of Containment High Pressure would be the detection of higher than anticipated radiation levels in the Secondary Containment and Plant gaseous effluents.
5. Containment Water Level II.F.1.5	SAME AS # 1	There presently exists instruments to monitor this parameter, however, the range of these instruments does not meet the requirements of Nureg 0737. Since Oyster Creek has a BWR Mark I Containment the containment cannot be flooded, just due to a LOCA, there would need to be the introduction of a large amount of water from some other source. This could be detected and stopped by the plant operators. Also, since the most accident monitoring instrumentation is located outside primary containment the plant is very insensitive to flooding inside containment.
5. Containment Hydrogen Monitor	SAME AS # 1	Oyster Creek has an Nitrogen inerted BWR Mark I Containment. This coupled with the fact that Oxygen is monitored would provide assurance that an explosive post accident environment did not develop.