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Writer's Direct Dial Number:

July 13, 1984

Director
Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Recombiner Capability Requirements of 10CFR50.44(c)(3)(ii)
Response to Generic Letter 84-09

On December 2, 1981, the NRC amended Section 50.44 of its regulations by addition of the provisions in 50.44(c)(3). On August 2, 1982, GPU Nuclear requested an exemption for Oyster Creek Nuclear Generating Station from the provisions of 50.44(c)(3). A site specific evaluation indicating the applicability of the BWR Owners Group generic studies to Oyster Creek was submitted on December 15, 1982.

Generic Letter 84-09 was issued on May 8, 1984 to all licensees of operating reactors. Then, by letter dated May 21, 1984, Oyster Creek was requested to modify their submittal by addressing the guidance provided in Generic Letter 84-09.

The attachment to this letter responds to Generic Letter 84-09. First, our response contains an assessment of the applicability of the generic studies, submitted by the Mark I Owners Group, to the Oyster Creek facility, and second; the three technical criteria contained in the Generic Letter 84-09 are addressed.

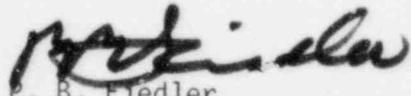
GPU Nuclear believes that this response to Generic Letter 84-09 satisfactorily resolves the issues raised for the Recombiner Capability Requirements of 10CFR50.44(c)(3)(ii) and that no further actions are required. We therefore withdraw our exemption request of August 2, 1982 regarding 10CFR50.44(c)(3)(ii).

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If you have any questions on this response, please contact M. W. Laggart at (201) 299-2341.

Very truly yours,



P. B. Fiedler
Vice President and Director
Oyster Creek

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cc: Administrator
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
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NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, N. J. 08731

Response to Generic Letter 84-09

On December 15, 1982 GPU Nuclear submitted a site specific evaluation based on the generic studies performed by the BWR Owners Group. This submittal concluded that the generic studies were applicable and bounding for Oyster Creek.

The Oyster Creek response to each of the technical criteria contained in Generic Letter 84-09 is provided below:

Criterion 1: The plant has technical specifications (limiting conditions for operation) requiring that, when the containment is required to be inerted, the containment atmosphere be less than four percent oxygen.

Response: The current Technical Specifications for Oyster Creek contain a limiting condition for operation that when the containment is required to be inerted, the containment atmosphere be less than five percent oxygen. GPU Nuclear has prepared Technical Specification Change Request #112 to incorporate the four percent oxygen limit. This TSCR #112 is presently being reviewed internally and will be submitted within the next 30 days. In the meantime, the four percent oxygen limit will be incorporated into the plant procedures.

Criterion 2: The plant has only nitrogen or recycled containment atmosphere for use in all pneumatic control systems within containment.

Response: At Oyster Creek when drywell inerting is completed, the Drywell Instrument Air/Nitrogen System is then placed into service. Two nitrogen compressors supply compressed nitrogen to perform all pneumatic functions. They operate on an alternate basis with staggered setpoints for pressure regulation. In the event of loss of power to the nitrogen compressor or loss of nitrogen pressure, the system will automatically transfer to air supply. This could result in air inleakage and increase the drywell oxygen concentration. If the concentration exceeds the high limit, the annunciator will then alert the operator to take proper actions.

Criterion 3: There are no potential sources of oxygen in containment other than that resulting from radiolysis of the reactor coolant. Consideration of potential sources of inleakage of air and oxygen into containment should include consideration of not only normal plant operating conditions, but also postulated loss-of-coolant-accident conditions. These potential sources of inleakage should include instrument air systems, service air systems, MSIV leakage control systems, purge lines, penetrations pressurized with air and inflatable door seals.

Response:

During normal operation, there is no potential source of oxygen in the Oyster Creek containment other than that resulting from radiolysis of the reactor coolant. The drywell is maintained at a positive pressure of about 0.25 psig to 1.2 psig. Makeup is drawn from a liquid nitrogen tank with a minimum of 99.7% purity. The makeup is manual for oxygen concentration or pressure control to the suppression chamber and the drywell. Because of its constant positive pressure relative to ambient, oxygen inleakage to the containment is unlikely through the penetrations.

Penetrations through the Oyster Creek containment use seal arrangements such as gasket, bonding resin, etc. No air inleakage is expected for these arrangements.

For the most severe hypothetical LOCA conditions, the Owners Group report has concluded that the increase of oxygen concentration will be from its initial value of 4% to a maximum of 5%, which is below the combustible margin. For Oyster Creek, our previous submittal of December 15, 1982 had concluded that the generic case was applicable and bounding.