GPU Nuclear

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January 12, 1996
C321-96-2006

Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20553

Dear Sir:

SUBJECT: Oyster Creek Nuclear Generating Station
Docket 50-219
Submittal of Emergency Action Levels for Review

As required by 10 CFR 50, Appendix E, Section IV B, enclosed are the proposed revisions to the Oyster Creek Emergency Action Levels (EAL's). Revisions to the EALs have been indicated by bars in the right margin. The basis for the proposed changes are detailed in Attachment 1.

Additionally, as required by the above criteria, the New Jersey Office of Emergency Management has reviewed the Oyster Creek Emergency Action Levels and finds no issues with the proposed EALs.

Should you have any questions, please contact Brenda DeMerchant, Oyster Creek Regulatory Affairs Engineer, at 609-971-4642.

Very truly yours,

Michael B Roche

Michael B. Roche
Vice President & Director
Oyster Creek

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Attachments

cc: Administrator, Region I (2 copies)
NRC Project Manager
NRC Resident Inspector
New Jersey Office of Emergency Management

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Attachment 1

Basis for EPIP-OC-.01 "Classification of Emergency Events" Revision 4

This revision incorporates four separate changes to EPIP-OC-.01, as follows:

Change #1

First, on pages E2-27, E2-28 and E2-29 the bases for the Unusual Event Category P.2, Alert Category P.2 and Site Area Emergency Category P.2 have been clarified by adding the description of an explosion as it applies to these EAL's.

This new description does not change the intent or use of these three EAL's, thus does not have the potential to adversely affect nuclear safety or safe plant operation.

Change #2

The second change adds an EAL and basis statement for the Independent Spent Fuel Storage Installation(ISFSI), now under construction. These changes are found on E1-6 and E2-17. These changes were developed using the facilities(ISFSI) safety analysis and NUMARC/NESP 007. The values used in this EAL have been determined to be conservative relative to the Unusual Event classification based on dose. The values used in this EAL will result in a lower dose at the site boundary. By adding this EAL the protection of the health and safety of the public is enhanced.

Change #3

Oyster Creek Technical Specifications have been revised to allow the removal of the automatic closure of the Main Steam Line Isolation Valves (MSIV's) due to Main Steam Line (MSL) High Radiation. This modification has been completed and the manual closure of the MSIV's on MSL High Radiation is controlled by 2000-ABN-3200.26 "Increase in Main Steam/Off Gas Activity". Unusual Event EAL Category I.4 (page E1-4) and its bases (page E2-13) have been changed to reflect the changes in the system and Technical Specifications. The initiating radiation level for the manual isolation is the same as the previous automatic trip setpoint and thus this change does not impact the declaration of the event.

Change #4

This group of changes are based on the NRC's EPPOS no.1 (June 1, 1995) "Emergency Preparedness Position on acceptable deviations from Appendix 1 of NUREG-0654 based upon the Staff's regulatory analysis of NUMARC/NESP-007 'Methodology for Development of Emergency Action Levels'". The EAL changes are as follows:

Basis for EPIP-OC-.01 "Classification of Emergency Events" Revision 4

Change #4 continued

1. Delete the Unusual Event Category K.1 "Transportation of contaminated or potentially contaminated injured personnel to a hospital". (Pages E1-1 and E2-17)

   Basis: This event does not meet the threshold of the emergency classification and is not a precursor to a more serious event. The event will still be reported in accordance with 10 CFR 50.72 as a non-emergency. The actions of EPIP-OC-.07 will be incorporated into Medical, Radcon and Operation's procedures.

   This is consistent with EPPOS No.1, Item 1 under Deletions.

2. Delete Unusual Events Category B.1 " Sustained Rx Pressure greater than 1060 psig and not controlled by procedure" and Category C.1 and C.2 "MCPR exceeds safety limit" or "LHGR exceeds fuel design limit" (Pages E1-1 and E2-4 & 5).

   Also Category N.1 "Any one of the following found to be inoperable in accordance with Tech Spec L.C.O.'s which require a plant shutdown.

   -Primary Containment
   -Secondary Containment
   -Containment Isolation Capability
   -Containment Spray System
   -Emergency Service Water System
   -Isolation Condenser System
   -Automatic Depressurization System
   -Core Spray System
   -Standby Gas Treatment System

   -or-

   -Fire Protection System

   -and-

   -Rx is in process of a shutdown

   -and-

   -The system is determined by the GSS/E.D. to be incapable of returning to operable status within 8 hours of initiating shutdown.

   This EAL is revised to read "Plant is not brought to required mode within Technical Specification L.C.O. Action Statement Time" (Pages E1-9 and E2-23)

   Basis: Exceeding Technical Specification limits for the period designated in the action statement is an analyzed condition of the plant and does not, by itself, represent an emergency. If plant conditions are outside of Technical Specifications limits and those conditions do result in degradation in the level of plant safety, other initiating conditions would trigger an appropriate classification within an acceptable time frame. When the plant can not be brought to the required operating mode within allowable action statement time, then a declaration of an Unusual Event is warranted.

Although EAL's are deleted, this area is adequately covered by the revised EAL N.1, such that there is no potential to adversely affect nuclear safety or safe plant operation.

This is consistent with EPPOS No.1 Items 2, 3 and 4 under deletion. As required by that section we have maintained Unusual Events Category H.2 "Confirmed Leak rate greater than: a. 5 gpm total unidentified leakage or b. 25 gpm total (identified and unidentified) but less than 50 gpm from the Rx Coolant System" and Category I.2 "Reactor coolant Iodine activity of greater than 0.2 uCi/gm, but less than 300 uCi/gm Dose Equivalent Iodine (DEI)".

3. Delete Unusual Event Category L.3 "Loss of access to all meteorological information including backup sources" (Pages E1-7 and E2-19).

   Due to a shift in emphasis from classification based on dose assessment to a classification based upon plant conditions, loss of meteorological instrumentation is no longer considered to meet the threshold of an Unusual Event.

   Although this EAL is deleted, its' deletion is based on the determination that it does not meet the criteria of an Unusual Event, thus there is no potential to adversely affect nuclear safety or safe plant operation.

   This change does not involve the description of any system or component and EALs are not detailed in the SAR so this change will not require revision to any system or component description in the SAR.

   This change does not involve the description of any procedural or operating description and EALs are not detailed in the SAR so this change will not require revision to any procedural or operating description in the SAR.

   This change does not involve any tests or experiments and EALs are not detailed in the SAR so this change will not require revision to any test or experiments described in the SAR.

   Technical Specifications do not include descriptions of EALs, thus this change will not conflict with Technical Specifications.

   This is consistent with EPPOS No.1 Item 6 under Deletions.