

GPU NUCLEAR CORPORATION
OYSTER CREEK NUCLEAR GENERATING STATION
(DOCKET NO. 50-219)
PROVISIONAL OPERATING LICENSE NO. DPR-16

Applicant hereby requests the commission to change Appendix A of the above captioned license as follows:

1. Section to be Changed:

Section 6.5.3.1

2. Extent of Changes:

Add two new paragraphs to section 6.5.3.1, one to state the requirement for auditing of the Fire Protection Program and one to state the requirement for auditing the performance of activities required specifically by the Operational QA Plan.

3. Change Requested:

The requested change is on the attached revised Technical Specification page 6-12.

4. Discussion:

Specification 6.5.3.1 cites the requirements for auditing of facility activities. Currently the Fire Protection Program and the QA Program are audited at least once per 12 months consistent with paragraph 6.5.3.1(a). It is requested that a new paragraph be added to require that the Fire Protection Program be audited at least once per 24 months. This would be consistent with the audit frequency identified in NRC Generic Letter 82-21.

Similarly it is requested that a new paragraph be added to require that the performance of activities required by the Operational QA Plan be audited at least once per 24 months. This audit frequency is consistent with the requirements of R.G. 1.33 (Feb. 1978), R.G. 1.144 (Jan. 1979) and ANSI/ASME N45.2.12-1977.

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OYSTER CREEK NUCLEAR GENERATING STATION
PROVISIONAL OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 128

Pursuant to 10CFR50.91, an analysis concerning significant hazards considerations is provided below:

1. Section to be Changed:

Section 6.5.3.1

2. Extent of Changes:

Add two new paragraphs to section 6.5.3.1, one to state the requirement for auditing of the Fire Protection Program and one to state the requirements for auditing the performance of activities required specifically by the Operational QA Plan.

3. Change Requested:

The requested change is on the attached revised Technical Specification page 6-12.

4. Discussion:

Specification 6.5.3.1 cites the requirements for auditing of facility activities. Currently the Fire Protection Program and the QA Program are audited at least once per 12 months consistent with paragraph 6.5.3.1(a). It is requested that a new paragraph be added to require that the Fire Protection Program be audited at least once per 24 months. This would be consistent with the audit frequency identified in NRC Generic Letter 82-21.

Similarly it is requested that a new paragraph be added to require that the performance of activities required by the Operational QA Plan be audited at least once per 24 months. This audit frequency is consistent with the requirements of R.G. 1.33 (Feb. 1978) R.G. 1.144 (Jan. 1979) and ANSI/ASME N45.2.12-1977.

5. Determination:

We have determined that this proposed amendment involves a clarification of auditing frequency requirements in the technical specifications.

Based on the above, operation of the Oyster Creek Nuclear Generating Station in accordance with Technical Specification Change Request No. 128 would not:

1. Involve a significant increase in the probability or consequence of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

QUALIFICATIONS

6.5.2.6

The independent reviewer(s) shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the area being reviewed or have 9 years of appropriate experience in the field of his specialty. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

RECORDS

6.5.2.7

Reports of reviews encompassed in Section 6.5.2.5 shall be prepared, maintained and transmitted to the cognizant division Vice President.

6.5.3 AUDITS

6.5.3.1

Audits of facility activities shall be performed under the cognizance of the Vice President Nuclear Assurance. These audits shall encompass:

- a. The conformance of facility operations to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the facility staff at least once per 12 months.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per six months.
- d. The Facility Emergency Plan and implementing procedures at least once per 12 months.
- e. The Facility Security Plan and implementing procedures at least once per 12 months.
- f. The Fire Protection Program and implementing procedures at least once per 24 months.
- g. The performance of activities required by the Operational Quality Assurance Plan to meet the criteria of Appendix 'B', 10CFR50, at least once per 24 months.
- h. Any other area of facility operation considered appropriate by the IOSRG or the Office of the President-GPUNC.

6.5.3.2

Audits of the following shall be performed under the cognizance of the Vice President - Technical Functions:

- a. An independent fire protection and loss prevention program