

OYSTER CREEK NUCLEAR GENERATING STATION
PROVISIONAL OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 141

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

1. Sections to be changed:

Table 4.1.1 on page 4.1-5

2. Extent of Changes:

Delete the requirement of a daily channel check for the following instrument channels:

- 1) Low Reactor Water Level
- 2) Low-Low Water Level

3. Changes Requested:

Revise page 4.1-5 (Table 4.1.1)

4. Discussion:

Technical Specification Change Request No. 141 reflects the replacement of two sets of non-environmentally qualified indicating pressure switches with two sets of environmentally qualified non-indicating switches. The new environmentally qualified switches do not have indicating gauges, therefore, the requirement of a daily channel check cannot be performed.

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Pursuant to 10CFR 50.91 an analysis concerning significant hazards considerations is provided below:

1. Sections to be changed:

Table 4.1.1

2. Extent of changes:

Delete the requirement of a daily channel check for the following instrument channels:

- 1) Low Reactor Water Level
- 2) Low-Low Water Level

3. Discussion:

The Oyster Creek Technical Specifications, Table 4.1.1, titled Minimum Check, Calibration and Test Frequency for Protective Instrumentation, requires that a daily channel check be performed on the Low and Low-Low-Reactor Water Level instrument channels. These two parameters (8 switches total) are currently equipped with indicating gauges. However, during our 10(M) (maintenance) outage, these two sets of non-environmentally qualified switches are scheduled to be replaced with environmentally qualified non-indicating switches that perform the protective safety function.

These new switches are similar to instruments in Table 4.1.1 which do not require daily channel check such as: High Reactor Pressure and Low-Low-Low Water Level.

The daily channel check presently conducted does not actually "check" the safety function. Verifying the operability of the switch can only be done by causing the switch to change condition which is done monthly.

The safety function will be adequately tested by the Technical Specification calibration and test requirements listed in Table 4.1.1.

Examples of amendments that are considered not likely to involve significant hazards considerations were provided in the Federal Register on April 6, 1983 (48 FR 14870). Technical Specification Change Request No. 141 meets the provisions of example (vii) which is "a change to make a license conform to changes in the regulations, where the license change results in a very minor change to facility operations clearly in keeping with the regulations". A copy of the modified page is provided.

4. Determination:

We have determined that the subject change request involves no significant hazards in operating the Oyster Creek Nuclear Generating Station in accordance with with Technical Specification. Change Request No. 141 would not:

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

**TABLE 4.1.1
MINIMUM CHECK, CALIBRATION AND TEST FREQUENCY FOR PROTECTIVE INSTRUMENTATION**

<u>Instrument Channel</u>	<u>Check</u>	<u>Calibrate</u>	<u>Test</u>	<u>Remarks (Applies to Test and Calibration)</u>
1. High Reactor Pressure	N A	1/3 mo.	Note 1	By application of test pressure
2. High Drywell Pressure(Scram)	N A	1/3 mo.	Note 1	By application of test pressure
3. Low Reactor Water Level	N A	1/3 mo.	Note 1	By application of test pressure
4. Low-Low Water Level	N A	1/3 mo.	Note 1	By application of test pressure
5. High Water Level in Scram Discharge Volume	N A	1/3 mo.	Note 1	By varying level in switch columns
6. Low-Low-Low Water Level	N A	1/3 mo.	Note 1	By application of test pressure
7. High Flow in Main Steamline	1/d	1/3 mo.	Note 1	By application of test pressure
8. Low Pressure in Main Steamline	N A	1/3 mo.	Note 1	By application of test pressure
9. High Drywell Pressure (Core Cooling)	1/d	1/3 mo.	Note 1	By application of test pressure
10. Main Steam Isolation Valve (Scram)	N A	N A	1/3 mo.	By exercising valve
11. APRM Level	N A	1/3d	N A	Output adjustment using operational type heat balance during power operation
APRM Scram Trips	Note 2	1/wk	1/wk	Using built-in calibration equipment during power operation
12. APRM Rod Blocks	Note 2	1/3 mo	1/mo	Upscale and downscale
13. a. High Radiation in Main Steamline	1/s	1/3 mo	1/wk	Using built-in calibration equipment during power operation
b. Sensors for 13(a)	N A	Each refueling outage	NA	Using external radiation source

NOTE 1: Initially once/mo, thereafter according to Fig. 4.1.1, with an interval not less than one month nor more than three months.

Note 2: At least daily during reactor power operation, the reactor neutron flux peaking factor shall be estimated and the flow-referenced APRM scram and rod block settings shall be adjusted, if necessary, as specified in Section 2.3, Specifications (1) (a) and (2) (a).