

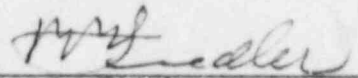
OYSTER CREEK NUCLEAR GENERATING STATION

PROVISIONAL OPERATING
LICENSE NO. DPR-16

TECHNICAL SPECIFICATION
CHANGE REQUEST NO. 126, Rev. 1
DOCKET NO. 50-219

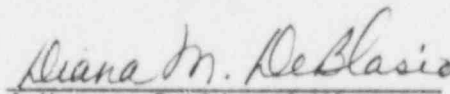
Applicant submits by this Technical Specification Change Request No. 126, Rev. 1 to the Oyster Creek Nuclear Generating Station Technical Specifications, modified page 3.5-3, 3.5-3a, 4.5-1 through 4.5-17.

By



Peter B. Fiedler
Vice President and Director
Oyster Creek

Sworn and subscribed to before me this 19th day of February 1988.



A Notary Public of NJ

DIANA M. DeGLASIO
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 6-5-91

(0102A)

OYSTER CREEK NUCLEAR GENERATING STATION
PROVISIONAL OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 126, Rev. 1

Applicant hereby requests the Commission to change Appendix A to the above-captioned license as below and, pursuant to 10CFR50.91, an analysis concerning the determination of no significant hazards considerations is also presented:

1. Section to be changed:

Section 3.5.A.3 and Section 4.5 and the corresponding bases.

2. Extent of change:

The revision to section 3.5.A.3 is actually the addition of 3.5.A.3.b which is a Limiting Condition for Operation (LCO) concerning plant operations if the drywell airlock is not operable. The revisions made to Section 4.5 reflect the requirements of Appendix J of 10CFR50. This revision also incorporates a change to the paragraph numbers as necessary to correct inconsistencies caused by this and previous revisions. The specific changes requested are as follows:

- (1) Specification 3.5.A.3 is modified as follows: Step 3.5.A.3.b is added to create an additional LCO concerning drywell airlock operability.
- (2) Specification 4.5, "Applicability", is modified as follows: This section now lists the major system surveillances and tests described in this section.
- (3) Specification 4.5, "Objectives", is modified as follows: This section now refers to Appendix J of 10CFR50.
- (4) Specification 4.5.A is modified as follows:
 - a) Step 1 concerning the pre-operational testing is deleted. Step 1 is no longer relevant, as it applies only to initial (pre-startup) testing of the containment.
 - b) Steps 2 and 3 are modified to reflect 10CFR50 Appendix J requirements. Part of step 2 has become the new step 1, and the rest of step 2 along with step 3 are moved to 4.5.C.
 - c) Step 4 has remained essentially intact and renumbered Step 2.
 - d) Steps 3 and 4 are added to reflect the requirements of Appendix J. Step 3 establishes a stabilization period prior to beginning the PCILRT and step 4 establishes a verification test to confirm calibration of instruments.

- e) Step 5 retains the test duration requirement.
 - f) Step 6 is added to reflect the requirements of 10CFR50, Appendix J, Section V.A.
- (5) Specification 4.5.B is modified as follows:
- a) Step 1 remains essentially unchanged with minor subscript changes to parallel variables used in Appendix J.
 - b) Steps 2 and 3 are modified to reflect the applicable standards.
 - c) Step 4 is added to establish an acceptance criteria for the verification test in accordance with section III.A.3(b) of Appendix J.
- (6) Specification 4.5.C is modified as follows:
- a) This section is the largest change and adds more restrictions than previously existed. These additions reflect compliance with Appendix J.
- (7) Specification 4.5.D is modified as follows:
- a) This first section concerning the first refueling outage is deleted.
 - b) The remainder of this section is modified to more closely reflect the testing frequency limits as imposed by Appendix J.
- (8) Specification 4.5.E is modified as follows:
- a) Steps 1 through 4 are taken apart and rearranged, but technically are still steps 1 through 4 with the addition of a requirement to use normal valve closures.
 - b) Step 5 is added to define testing of the largest containment penetration, the airlock.
- (9) Specification 4.5.F is modified as follows:
- a) The heading is changed from "Corrective Action" to "Acceptance Criteria".
 - b) Step 4.5.F.1 establishes the acceptance limits as presented in Appendix J.
 - c) Step 4.5.F.2 maintains the special case limits established for MSIVs at Oyster Creek.
 - d) Specification 4.5.F.3 includes the approved method for reduced pressure testing of the drywell airlock (Letter dated March 4, 1982, Re: Safety Evaluation Report and Technical Evaluation Report by Franklin Research Center.)

(10) Specification 4.5.G is modified as follows:

- a) The original specification 4.5.G is moved to specification 4.5.H. This is the beginning of the paragraph numbering change.
- b) The new specification 4.5.G is added to establish a local leak rate testing interval limit in accordance with the referenced standards.

(11) Specifications 4.5.H, I, J, K, and L in the proposed change correspond respectively to 4.5.G, H, I, J, and K in the present Technical Specifications. This change is merely a change to the paragraph numbering system.

(12) Specification L in the present technical specification is deleted. The proposed change to the Technical Specifications will utilize paragraph L. The rest of specification 4.5. is unchanged with the exception of the corresponding bases.

(13) Several typographical errors have been corrected as follows:

<u>Section</u>	<u>Corrections</u>
4.5.J.4.b	3.5.A.3.a changed to 3.5.A.4.a
4.5.J.5.b.(3)	3.5.A.4.a changed to 3.5.A.5.a
4.5.Q.1.a	124 months changed to 124 days

(14) The section 4.5 basis has been revised to eliminate reference to the preoperational containment test pressures since this is no longer applicable.

3. Changes requested:

Replace the old pages 3.5-3 with new pages 3.5-3 and 3.5-3a, and replace the old section 4.5 with the new section 4.5 in its entirety.

4. Discussion:

Appendix J to 10 CFR Part 50 was published on February 14, 1973. On August 7, 1975, the NRC requested Jersey Central Power and Light (JCP&L) Company to review its containment leakage testing program for Oyster Creek and the associated technical specifications, for compliance with the requirements of Appendix J.

JCP&L responded by letter dated December 24, 1975, which was supplemented by letters dated August 12, 1976, November 22, 1978 and June 27, 1980.

NRC letter dated March 4, 1982 transmitted their Safety Evaluation of the Appendix J review for the Oyster Creek Nuclear Generating Station. Consistent with that safety evaluation, and by letter dated September 25, 1984, General Public Utilities (GPU) Nuclear (now the licensee) submitted Technical Specification Change Request No. 130 to change paragraph 4.5.F.1.b. After the NRC staff June/July Progress Review meeting with GPUN on July 31 and August 1, 1985, the licensee agreed to withdraw Technical Specification Change Request No. 130. The withdrawal was confirmed by NRC letter dated August 26, 1985.

GPUN is now submitting Technical Specification Change Request No. 126. Change No. 126 addresses the program which verifies that the leakage from the Primary Containment, both integrated and local, is maintained within specific values as outlined in Appendix J of 10CFR50. The major modifications incorporated in the Integrated Leak Rate Testing Program are the establishment of a stabilization period for internal containment pressure, and a verification test to check the accuracy of leakage detection methods. The leakage limits are also more closely defined in this proposed revision. The new section on "Corrective Action" gives detailed options as to what may be done to limit leakage during the PCILRT. This specification allows for repairs and local testing of the repairs. It also allows for the re-commencement of the PCILRT without the required stabilization period if containment was not depressurized. The testing frequency of three times in ten years, or approximately every 40 months is established and the reference to doing the pre-operational test is eliminated.

The major modification to the LLRT program is the modification to the drywell airlock test. The 35 psig peak pressure airlock test required by Appendix J is established, but because of concerns described in NUREG/CR-4398 the frequency of airlock tests at 35 psig will be limited. When permissible a 10 psig test will be utilized. The acceptance criteria for the LLRT program is established as well as a testing frequency. The change also adds an LCO in section 3.5. The LCO limits plant operation when the airlock is not operable.

There is no plant configuration change involved with this technical specification change request. The testing described here is merely a surveillance program designed to verify primary containment integrity. The program outlined here is designed to bring the current program in line with the requirements of Appendix J to 10CFR50.

5. Determination

The Commission has provided guidance concerning the application of the standards of 10CFR50.92 for determining whether a significant hazards consideration exists by providing certain examples as discussed in the Federal Register on April 6, 1983 (48 FR 14870) under the heading "Examples of Amendments That Are Considered Not Likely to Involve Significant Hazards Considerations". Example (i) relates to a purely administrative change to Technical Specifications: i.e., a change to achieve consistency throughout the Technical Specifications, correction of an error, or a change in nomenclature. Example (ii) relates to a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications; i.e., a more stringent surveillance requirement. Example (vii) relates to a change to make a license conform to changes in the regulations, when the license change results in very minor changes to facility operations clearly in keeping with the regulations.

In this case, each component of the proposed change described above is similar to at least one of the three examples. The change in the numbering scheme is clearly an administrative change as described in example (i). The addition of Specification 3.5.A.3.b is consistent with both examples (ii) and (vii). The modifications and additions made to Specifications 4.5.A through 4.5.G also relate easily to example (ii) in

that a more stringent and comprehensive surveillance requirement is established. Example (vii) also relates in that the surveillance program, in the form presented in this proposal, is defined by a regulation to which the licensee is conforming.

The proposed modification to the Technical Specifications will not involve a significant hazards consideration because operation of Oyster Creek Nuclear Generating Station in accordance with this change would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated. This change merely re-defines the leak rate testing program for Primary Containment. This program is designed to ensure that the Primary Containment is able to perform its design function. That function is to contain the energy and the radioactive release of the design basis loss of coolant accident. Therefore, this change cannot increase the probability or consequences of an accident previously evaluated.
- (2) create the possibility of a new or different kind of accident from any previously analyzed. It has been determined that, because this revision more clearly establishes the requirements and methods of testing the Primary Containment Integrity and does not involve a change to the containment configuration, this change will not create the possibility of a new or different kind of accident from any previously evaluated.
- (3) involve a significant reduction in a margin of safety. This change has increased the requirements as established in Appendix J that the primary containment must meet to be considered operable. Therefore, this change will not reduce the margin of safety.

This change reflects the requirements of Appendix J to 10CFR50.