OYSTER CREEK NUCLEAR GENERATING STATION
PROVISIONAL OPERATING LICENSE No. DPR-16
Docket No. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 133

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

1. Section to be changed:

   3.5.B.3

2. Extent of Change

   Change specifications 3.5.B.3.a.1 and 3.5.B.3.b.1, relative to the Standby Gas Treatment System, to address circumstances where demonstration of system operability is required within 12 hrs. of significant painting, fire, or chemical release in the reactor building.

   The changes are indicated in the attached page 3.5-4 of the Oyster Creek Technical Specifications.

3. Discussion:

   The function of the SBGTS is to treat and exhaust the atmosphere of the reactor building to the stack during containment isolation conditions with a minimum release of radioactive material from the containments to the environments. Two separate filter trains are provided, each having 100% capacity.

   The current Oyster Creek Technical Specifications require that with one SBGTS train inoperable, the other train must be demonstrated operable within 2 hours. Inspection 50-219/84-11 identified the need for a change in the specification based upon LER 84-7 involving failure to test a SBGTS train within the required time.

   Technical Specification Change Request No. 133 provides a provision which will allow the delayed demonstration of the operable SBGTS train upon the loss of one train, if significant painting, fire, or chemical release has taken place in the reactor building within the previous 12 hrs. Current technical specification surveillance tests provides adequate assurance that the SBGTS will operate upon demand. The proposed change will enhance plant safety by increasing system availability and avoiding unnecessary degradation of the system.

   The current specifications for demonstrating the operability of the SBGTS, upon the loss of one train, do not address circumstance where significant painting, fire, or chemical release has taken place in the reactor building within the previous 12 hrs. Implementation of the current requirements, under these conditions, could degrade the system unnecessarily and would not enhance the safety of the plant. In addition, demonstrating operability during these events would require subsequent compliance with specification 4.5.k and would negatively affect system availability.

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

1. Sections to be changed:

   3.5.B.3.a.1 and 3.5.B.3.b.1.

2. Extent of Change:

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   The function of the SBGTS is to treat and exhaust the atmosphere of the reactor building to the stack during containment isolation conditions with a minimum release of radioactive material from the containments to the environments. Two separate filter trains are provided, each having 100% capacity.

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   The current specifications for demonstrating the operability of the SBGTS, upon the loss of one train, do not address circumstance where significant painting, fire, or chemical release has taken place in the reactor building within the previous 12 hrs. Implementation of the current requirements, under these circumstances, could degrade the system unnecessarily and would not enhance the safety of the plant. In addition, demonstrating operability, during these events would require subsequent compliance with specifications 4.5.k and would negatively affect system availability.

We have determined that this change request involves no significant hazards in that operation of the Oyster Creek Plant in accordance with the proposed amendment will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2. Create the probability of a new or different kind of accident from any accident previously evaluated; or

3. Involve a significant reduction in a margin of safety.

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3. With one standby gas treatment system circuit inoperable:

   a. During Power Operation:

      1. Demonstrate the operability of the other standby gas treatment system circuit within 2 hours unless significant painting, fire, or chemical release has taken place in the reactor building within the previous 12 hours. In this event, demonstration of operability shall take place within 1 hour of the expiration of the 12 hour period, and

      2. Continue to demonstrate the operability of the standby gas treatment system circuit once per 24 hours until the inoperable standby gas treatment circuit is returned to operable status.

      3. Restore the inoperable standby gas treatment circuit to operable status within 7 days or be subcritical with reactor coolant temperature less than 212°F within the next 36 hours.

   b. During Refueling:

      1. Demonstrate the operability of the redundant standby gas treatment system within 2 hours unless significant painting, fire, or chemical release has taken place in the reactor building within the previous 12 hours. In this event, demonstration of operability shall take place within 1 hour of the expiration of the 12 hour period, and

      2. Continue to demonstrate the operability of the redundant standby gas treatment system once per 7 days until the inoperable system is returned to operable status.

      3. Restore the inoperable standby gas treatment system to operable status within 30 days or cease all spent fuel handling, core alterations or operation that could reduce the shutdown margin (excluding reactor coolant temperature changes).

4. If Specifications 3.5.B.2 and 3.5.B.3 are not met, reactor shutdown shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours and the condition of Specification 3.5.B.1 shall be met.

Bases:

Specifications are placed on the operating status of the containment systems to assure their availability to control the release of any radioactive materials from irradiated fuel in the event of an accident condition. The primary containment system (1) provides a barrier against uncontrolled release of fission products to the environs in the event of a break in the reactor coolant systems.

Whenever the reactor coolant water temperature is above 212°F, failure of the reactor coolant system would cause rapid expulsion of the coolant from the reactor with an associated pressure rise in the primary containment. Primary containment is required, therefore, to contain the thermal energy of the expelled coolant