#### OYSTER CREEK NUCLEAR GENERATING STATION

PROVISIONAL OPERATING LICENSE NO. DPR-16

TECHNICAL SPECIFICATION CHANGE REQUEST NO. 174 DOCKET NO. 50-219

Applicant submits by this Technical Specification Change Request No. 174 to the Oyster Creek Nuclear Generating Station Technical Specifications, modified pages 3.1-8, and 3.1-19.

Vice President and Director

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Oyster Creek

Sworn to and Subscribed before me this 28th day of September.

ic of New Jersey

CAROL A. SCARPINATO NOTARY PUBLIC OF NEW JERSEY My Commission Expires Feb. 27, 1991

# OYSTER CREEK NUCLEAR GENERATING STATION PROVISIONAL LICENSE DPR-16 DOCKET NO. 50-219 TECHNICAL SPECIFICATION CHANGE REQUEST NO. 174

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

### 1. Section to be Changed:

Table 3.1.1.A.2, and notes

### Extent of Change:

- a. Table 3.1.1.A.2: add note "11" to the Start Up mode.
- b. Add note "kk" to the Table 3.1.1 notes.
- c. Add note "11" to the Table 3.1.1 notes.

### Change Requested:

Replace old pages 3.1-8, and 3.1-19 with new pages 3.1-8, and 3.1-19.

### 4. Discussion

Refer to No Significant Hazard Analysis which immediately follows.

## OYSTER CREEK NUCLEAR GENERATING STATION PROVISIONAL LICENSE DPR-16 DOCKET NO. 50-219 TECHNICAL SPECIFICATION CHANGE REQUEST NO. 174

This Technical Specification Change Request has been determined to contain No Significant Hazards as required by 10CFR50.91. These evaluations are specified in 10CFR50.92.

The requested change adds a reference to note "11" in the startup mode for the High Reactor Pressure Scram function. Proposed note "11" will state:

"This function not required to be operable with the reactor vessel head removed or unbolted."

Table 3.1.1 note "kk" is being reserved for another Technical Specification change request presently under review.

When reactor temperature is less than 212°F and either the vessel head is removed or unbolted, there is no possibility of a major reactor pressure excursion. As an excursion is not possible, the instrumentation required to scram the reactor in response to an excursion serves no purpose. Additionally, the Boiling Water Reactor Standard Technical Specifications specifically state that the High Pressure Scram function is not required when the head is unbolted or removed in the STARTUP mode. This request more closely aligns the Oyster Creek Nuclear Generating Station Technical Specifications with the Boiling Water Reactor Standard Technical Specifications.

Therefore the requested change has been determined to contain No Significant Hazards in that it does not:

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

The requested change is applicable only under those previously evaluated conditions where the function has been determined to be not required. Therefore, it does not increase the probability or consequences of any previously evaluated accident.

 Create the possibility of a new or different kind of accident from any accident previously evaluated.

As the requested change is only applicable to those conditions where the protective function has been determined to be not required, no new or different kind of accident is created.

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

As the applicability of the requested change has been limited to those times when the function is not required, no reduction in a margin of safety is possible.