

OYSTER CREEK NUCLEAR GENERATING STATION
PROVISIONAL OPERATING LICENSE NO. DPR-16
DOCKET NO. 50-219
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 153

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

1. Sections to be changed:

Section 3.1 and its bases.

2. Extent of Change:

Section 3.1 and its bases are being changed to reflect the additional time required to perform surveillance testing on analog trip systems.

3. Change requested:

Replace old page 3.1-3 and 3.1.12 with the new page 3.1-3 and 3.1.12, attached.

4. Discussion:

The existing limit of one hour out of service time per month is being replaced with a limitation of two hours out of service per Technical Specification required surveillance. The new wording has been taken from the BWR Standard Technical Specifications and reflects the increased time required to surveil an analog trip system as compared to a digital trip system.

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Pursuant to 10 CFR 50.91, an analysis concerning no significant hazards considerations is provided below:

GPU Nuclear has determined that this request involves no significant hazards in that this request would not:

1. Increase the probability of an accident or malfunction of Nuclear Safety Related or Important to Safety equipment previously evaluated in the Oyster Creek FSAR.
2. Create a possibility of a new or different type of accident or malfunction than any evaluated previously in the SAR.

The OC Safety Analysis Report refers to the Technical Specifications which discuss the implications of removing a protective instrument from service in order to perform surveillance testing.

3. Reduce the margin of safety in any Technical Specification bases.

Monthly surveillance testing is necessary to provide a high degree of reliability for the automatic actuation circuits of the Reactor Protection and Engineered Safety Feature Systems. In order to test the actuation circuit completely, it must be made inoperable but not tripped. Tripping the channel rather than making it inoperable during the required surveillance testing would increase the likelihood of spurious scrams or unnecessary challenges to safety systems.

The constraint upon extended out of service time for one sub-channel of an actuation circuit is that the other sub-channel (of the same channel) is then solely responsible for actuating that logic circuit. Given the tested reliability of the operational instrument, an increase in out of service time from one hour to two hours will have a negligible effect on channel failure rate.

Additionally, the Standard Technical Specifications for GE Boiling Water Reactors, NUREG-0123, specifies a 2 hour limit per Technical Specification required surveillance.

assumed uniform rod withdrawal approach to the scram level, the rate of power rise is no more than five percent of rated per minute, and three operable IRM instruments in each trip system would be more than adequate to assure a scram before the power could exceed the safety limit. In many cases, if properly located, a single operable IRM channel in each trip system would suffice.

4. When required for surveillance testing, a channel is made inoperable. In order to be able to test its trip function to the final actuating device of its trip system, the trip system cannot already be tripped by some other means such as a mode switch, interlock, or manual trip. Therefore, there will be times during the test that the channel is inoperable but not tripped. For a two channel trip system, this means that full reliance is being placed on the channel that is not being tested. A channel may be placed in an inoperable status for up to 2 hours for required surveillance without placing the trip system in the tripped condition provided at least one operable channel in the same trip system is monitoring that parameter.

Bypasses of inputs to a trip system other than the IRM and APRM bypasses are provided for meeting operational requirements listed in the notes in Table 3.1.1. Note a allows the "high water level in scram discharge volume" scram trip to be bypassed in the refuel mode. In order to reset the safety system after a scram condition, it is necessary to drain the scram discharge volume to clear this scram input condition. (This condition usually follows any scram, no matter what the initial cause might have been.) In order to do this, this particular scram function can be bypassed only in the refuel position. Since all of the control rods are completely inserted following a scram, it is permissible to bypass this condition because a control rod block prevents withdrawal as long as the switch is in the bypass condition for this function.

TABLE 3.1.1 (CONT'D)

- * Action required when minimum conditions for operation are not satisfied. Also permissible to trip inoperable trip system. When necessary to conduct tests and calibrations, one channel may be made inoperable for up to two hours per Technical Specification required surveillance without tripping its trip system.
- ** See Specification 2.3 for Limiting Safety System Settings.

Notes:

- a. Permissible to bypass, with control rod block, for reactor protection system reset in refuel mode.
- b. Permissible to bypass below 800 psia in refuel and startup modes.
- c. One (1) APRM in each operable trip system may be bypassed or inoperable provided the requirements of Specification 3.1.C and 3.10.C are satisfied. Two APRM's in the same quadrant shall not be concurrently bypassed except as noted below or permitted by note.

Any one APRM may be removed from service for up to one hour for test or calibration without inserting trips in its trip system only if the remaining operable APRMs meet the requirements of specification 3.1.B.1 and no control rods are moved outward during the calibration or test. During this short period, the requirements of specifications 3.1.B.2, 3.1.C and 3.10.C need not be met.
- d. The IRM shall be inserted and operable until the APRM's are operable and reading at least 2/150 full scale.
- e. Air ejector isolation valve closure time delay shall not exceed 15 minutes.
- f. Unless SRM chambers are full inserted.
- g. Not applicable when IRM on lowest range.
- h. One instrument channel in each trip system may be inoperable provided the circuit which it operates in the trip system is placed in a simulated tripped condition. If repairs cannot be completed within 72 hours the reactor shall be placed in the cold shutdown condition. If more than one instrument channel in any trip system becomes inoperable, the reactor shall be placed in the cold shutdown condition. Relief valve controllers shall not be bypassed for more than 3 hours (total time for all controllers) in any 30-day period and only one relief valve controller may be bypassed at a time.