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February 4, 1987

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station  
Revised Program for Inspection of  
BWR Stainless Steel Piping

In your letter of September 5, 1986, we were requested to revise the OCNCS Technical Specifications (TS) for the reactor coolant system leakage. Specifically, TS sections 3.3 and 4.3 were to agree with items B, C and E of Attachment 1 to Generic Letter (GL) 84-11. Briefly, these items were: (B) the maximum increase in unidentified leakage is 2 gpm within any 24 hour period while operating, (C) the outage time for inoperable leakage measurement instruments associated with each sump is 24 hours, and (E) a visual examination for leakage of the reactor coolant piping is performed during each outage in accordance with ASME Section XI, Articles IWA-5221, IWA-5241, and IWA-5242.

Item B-GL 84-11

We have reviewed TS 3.3D.4, and we agree that the time interval for unidentified leakage should be 24 hours instead of 4 hours. Within forty-five days from this letter, we will submit a TS change request which will propose a maximum leak rate increase of 2 gpm within any 24 hour period while operating at steady state power.

Item C-GL 84-11

A brief discussion of the system operation is necessary in order to understand the basis for TS 3.3D.4 and 3.3D.5.

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The rates of identified and unidentified primary coolant system leakage at OCNGS are determined with the primary containment equipment drain tank and primary containment sump flow monitoring systems, respectively. High and low water level indications in the sump and tank are used for pump actuation. The systems are also equipped with integrating flow meters, which keep track of liquid pumped from the sump and drain tank. These meters are located between the sump and drain tank pumps and the respective waste collector tanks.

The OCNGS TS permits operation for seven days when the flow integrators are determined inoperable. During this period, alternate means are used to determine the identified (Proc. 351.2) or unidentified (Proc. 351.1) leak rates. These procedures require the affected leak rate measurement to be performed every four hours by manually pumping the affected tank or sump to the appropriate waste hold-up tanks and recording times for the transfer. A calculation is then performed to determine the leak rate which is recorded every four hours. Additionally, for the unidentified leakage detection system, a recorder is available in the control room which provides a continuous indication of the estimated leak rate by utilizing a differential pressure signal as a result of the sump level change. The sensitivity of the recorder is approximately 0.2 gpm. Also, an annunciator will alarm in the control room if the time to fill the containment sump is too short of an interval. The timer associated with the alarm is set to bring in the alarm if the leak rate equals or exceeds 4 gpm.

After seven days with the primary detection system still determined inoperable for the identified or unidentified leakage, the reactor will be placed in the shutdown condition within 12 hours. In view of these facts, we conclude that OCNGS TS meets the intent of GL 84-11, and a revision to the TS does not appear to be warranted.

#### Item E-GL 84-11

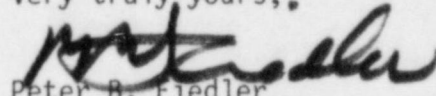
For Item E, OCNGS TS 4.3D stipulates a visual examination for leaks shall be made with the reactor coolant system at pressure during each scheduled refueling outage or after major repairs have been made to the reactor coolant system in accordance with Article 5000 of ASME Section XI. Furthermore, OCNGS system pressure test procedures are in accordance with the 1980 edition through winter 81 addenda of Section XI which has been approved for use by the NRC at Oyster Creek.

GL 84-11 states that a visual examination for leakage of the reactor coolant piping shall be performed during each plant outage in which the containment is deinerted. Furthermore, the examination will be performed consistent with Articles IWA-5241, IWA-5221, and IWA-5242 of the 1980 Edition of the Section XI of the ASME Boiler and Pressure Vessel Code.

The main difference between GL 84-11 and OCNCS TS 4.3D is the interpretation of "outage". We believe a visual inspection every refueling outage in conjunction with the TS requirements for unidentified leakage during normal operation provide reasonable assurance that the plant will be operated safely. Therefore, the performance of visual examinations for all unscheduled drywell entries, not related to primary leakage, is beyond the objective of GL 84-11, and a revision to the TS does not appear to be warranted.

If you have any questions on this response, please contact Mr. M. W. Laggart, Manager, BWR Licensing at (201) 263-6205.

Very truly yours,



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