

GPU Nuclear, Inc. U.S. Route #9 South Post Office Box 388 Forked River, NJ 08731-0388 Tel 609-971-4000

August 30, 1999 1940-99-20443

U.S. Nuclear Regulatory Agency Attention: Document Control Desk Washington, DC 20555

Gentlemen,

Subject: Oyster Creek Nuclear Generating Station, (OCNGS)

Docket No. 50-219

Response to Request for Environmental Impact of TSCR 251

By letter dated April 28, 1999, GPU Nuclear submitted Technical Specification Change Request (TSCR) 251 "Movement of Loads up to 45 Tons With the Reactor Building Crane During Power Operations." That amendment request was submitted in response to NRC Bulletin 96-02. By telephone on August 2, 1999, the NRC requested that GPU Nuclear provide an environmental impact assessment for TSCR 251.

TSCR 251 specifically excludes any cask load containing irradiated fuel. In addition, Oyster Creek continues to be bound by Technical Specification 5.3.B.1, which prohibits moving any load greater in weight than a fuel assembly over stored irradiated fuel. Therefore, a radiological release from stored spent fuel is precluded.

TSCR 251 is limited to the use of the reactor building crane and, therefore, all activities will take place within the reactor building. The reactor building is designed to mitigate accidents of various types. Given the design of the reactor building and the fact that irradiated fuel is not involved in the activities covered in TSCR 251, it has no impact on the environment.

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GPU Nuclear also considered the effect the issuance of an amendment permitting movement of loads up to 45 tons with the reactor building crane might have on discharges or effluents. Similarly, the proposal was reviewed with regard to hazardous or non-hazardous waste, land disturbance, or components regulated by environmental permits.

GPU Nuclear determined that, since secondary containment will be maintained, the capability to control, treat or monitor releases to the environment will not be compromised. TSCR 251 is related to the movement of loads with the reactor building crane and has no impact to any facility effluent or release.

The movement of "heavy" loads within the reactor building will not produce any hazardous or non-hazardous waste. Therefore, it can not increase the amount or type of waste generated. In addition, it has no relationship to the permanent or temporary storage of hazardous or other regulated waste.

All activities resulting from this TSCR will take place in the reactor building, therefore, no land disturbance will result. TSCR 251 is related to the movement of loads with the reactor building crane and has no impact on wastewater treatment facilities or other systems regulated by environmental permits.

If there are any questions concerning this letter, please contact Dennis Kelly of my staff at (609) 971-4246.

Sincerely,

Michael B. Roche

Vice President and Director

Oyster Creek

cc: Region I Administrator

Oyster Creek Project Manager

Oyster Creek Senior Resident Inspector