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February 15, 1990

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Technical Specification Change Request No. 183

Pursuant to 10 CFR 50.90 and 10 CFR 50.91, GPU Nuclear Corporation (GPUN), operator of the Oyster Creek Nuclear Generating Station, Provisional Operating License No. DPR-16, requests a change to Appendix A of that license.

The enclosed Technical Specification Change Request (TSCR) proposes to permit no limitation on the number of inoperable position indicators for the sixteen ASME Code safety valves during power operation. Each safety valve has a primary and a backup position indicator. The primary device is an acoustic monitor while the backup device is a thermocouple. The requirements for relief and safety valve position indication were described in NUREGs 0578, 0660 and 0737. Acoustic monitors were installed in 1980 in response to NUREG 0578 to complement the existing thermocouples.

On April 29, 1988, GPUN submitted TSCR No. 173 which was similar to this license amendment request. The NRC Staff verbally denied those requested changes via telecon on May 4, 1988. As a result of further discussion with the Staff on May 5, 1988, we revised the request and submitted TSCR No. 173, Revision 1 on May 11, 1988. During the May 5, 1988 telecon, the NRC Staff indicated that our original request could not be acted upon since it was considered a generic issue and should be handled as such by the BWR Owners Group (BWROG). GPUN subsequently requested the BWROG to consider the April 29, 1988 license amendment request for generic applicability. The BWROG did not specifically address the Oyster Creek case but has proposed improved technical specifications which were forwarded to the NRC on May 5, 1989. The change we are requesting at this time is consistent with the specifications for safety/relief valve (piped to suppression pool) position indication proposed by the BWROG for the BWR 4 Improved BWR Technical Specifications. The BWROG has further proposed that only Type A, Category 1 accident monitoring instrumentation as defined in Regulatory Guide 1.97 be retained in technical specifications. The safety valve position indicators at Oyster Creek are classified as Type D, Category 3.

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On June 28, 1988, Revision 1 of TSCR No. 173 was approved by the NRC and issued as Amendment No. 123. This amendment provided very limited interim relief from safety valve position indication operability for the remainder of operating cycle 11 only. The interim relief provided by Amendment 123 prevented a plant shutdown due to safety valve acoustic monitor failures. Oyster Creek is currently in operating cycle 12. On Wednesday, June 21, 1989, an acoustic monitor on safety valve NR28H was found to be inoperable. The acoustic monitor setpoint associated with safety valve NR28J (the only adjacent safety valve) was reduced in accordance with Technical Specification 3.13.B.2. When this was done, the acoustic monitor on safety valve NR28J was alarming due to high background noise. In order to eliminate the alarm and consider the NR28J acoustic monitor operable, plant power output was reduced by approximately 20 megawatts electric. This reduced steam flow and background noise and stopped the acoustic monitor on safety valve NR28J from alarming. The power derate was a direct result of compliance with Oyster Creek Technical Specification 3.13.B.2.

Currently, Oyster Creek Technical Specifications require a plant shutdown depending on the number of inoperable safety valve position indicators and the location of their associated safety valves. The sixteen safety valves are located on the main steam piping inside containment and they discharge directly to the containment atmosphere. These valves are spring-type Code safety valves with no means of remote control.

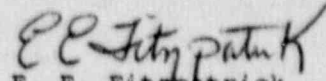
Since October 1984 until the present there have been approximately 24 safety valve acoustic monitor failures during power operation. So far, only a limited power reduction resulted from Technical Specification requirements. However, based on this experience with the acoustic monitors, we anticipate that other power reductions or shutdowns will be necessary. Our safety evaluation has concluded that safety valve position indicators provide no real safety benefit. Since no benefit would result from upgrading or replacing the acoustic monitors with a more reliable system, we are requesting a change to Oyster Creek Technical Specification Section 3.13.B in order to eliminate the potential for unnecessary shutdowns due to safety valve position indicator operability requirements.

The essence of the proposed change is to permit continued operation with no limitation on the number of inoperable position indicators for the safety valves. Repair of any inoperable devices would still be required prior to startup following each cold shutdown. The basis for the proposed change is that, at Oyster Creek, procedure-directed operator response to symptoms indicative of a primary system steam or liquid release inside containment is no different whether the source is an open safety valve or breach in the reactor coolant pressure boundary. Our evaluation in support of this proposed change concludes that safety valve position indicators provide no benefit as regards operator response to this type of event. Consistent with NUREG 0737, revised operability requirements would still be maintained in the Technical Specifications with no change to current surveillance requirements.

This change request has been reviewed in accordance with Section 6.5 of the Oyster Creek Technical Specifications, and using the standards in 10 CFR 50.92 we have concluded that this proposed change does not constitute a significant hazards consideration.

Pursuant to 10 CFR 50.91(b)(1), a copy of this change request has been sent to the State of New Jersey Department of Environmental Protection.

Very truly yours,


E. E. Fitzpatrick
Vice President and Director
Oyster Creek

EF/PC/cb(6732f)

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