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Nuclear Business Unit

MAR 2 2000

LR-N000058
LCR S00-01

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

**REQUEST FOR LICENSE AMENDMENT
CONTAINMENT SYSTEM
SALEM GENERATING STATION UNITS 1 AND 2
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311**

Gentlemen:

In accordance with the requirements of 10CFR50.90, Public Service Electric and Gas Company (PSE&G) hereby requests a revision to the Technical Specification (TS) for the Salem Generating Station Units No. 1 and 2. In accordance with 10CFR50.91(b)(1), a copy of this submittal has been sent to the State of New Jersey.

This amendment proposes to modify the Salem Units 1 and 2 Technical Specifications (TS) 3/4.6.3 "Containment Isolation Valves." The proposed change deletes the asterisk (*) modifying the word OPERABLE in the limiting condition for operation 3.6.3.1 and 3.6.3 for Salem Units 1 and 2 respectively, and relocates its associated footnote at the bottom of the page to immediately following the ACTION statement. The new note is re-worded to be consistent with TS 3.6.3 of NUREG 1431, Rev 1 (April 1995) "Standard Technical Specifications Westinghouse Plants." New Technical Specifications bases are also provided.

The proposed changes have been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c) and PSE&G has concluded that this request involves no significant hazards considerations. PSE&G has also reviewed the proposed TS change against the criteria of 10 CFR 51.22 for environmental considerations. The proposed changes do not involve a significant hazards consideration, nor increase the types and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the above, PSE&G concludes that the proposed change meets the criteria delineated in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

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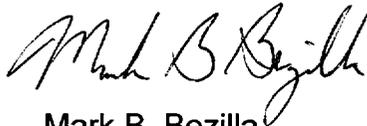
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The marked up TS pages affected by the proposed changes are provided in Attachment III.

Upon NRC approval of the proposed change, PSE&G requests that the amendment be made effective upon issuance, but allow an implementation period of sixty (60) days to provide sufficient time for associated administrative activities.

Should you have any questions regarding this request, we will be pleased to discuss them with you.

Sincerely,



Mark B. Bezilla
Vice President –
Operations

Affidavit
Attachments (3)

C Mr. H. Miller, Administrator - Region I
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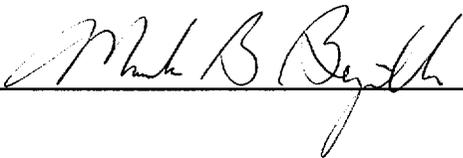
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STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

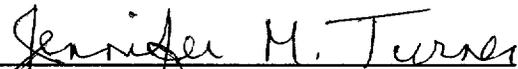
M. B. Bezilla, being duly sworn according to law deposes and says:

I am Vice President - Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth in the above referenced letter, concerning Salem Generating Station, Units 1 and 2, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me

this 2nd day of March, 2000



Notary Public of New Jersey

My Commission expires on _____
JENNIFER M. TURNER
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 25, 2000

**ATTACHMENT I
PROPOSED AMENDMENT TO SALEM UNITS 1 AND 2
TECHNICAL SPECIFICATIONS (T.S.)
T.S. 3/4.6.3 CONTAINMENT ISOLATION VALVES
LR-N000058**

REQUESTED CHANGE AND PURPOSE

The proposed change revises Technical Specification (TS) Section 3/4.6.3. The proposed change deletes the asterisk (*) by the word OPERABLE in the limiting condition for operation (LCO) 3.6.3.1 and 3.6.3 for Salem Units 1 and 2 respectively. The proposed change relocates the asterisk's associated footnote from the bottom of the page to immediately following the ACTION section of the Technical Specification. The footnote will also be clarified, as indicated in INSERT A, to be consistent with TS 3.6.3 of NUREG 1431, Rev 1 (April 1995) "Standard Technical Specifications Westinghouse Plants."

The purpose of the proposed change is to eliminate the potential for misinterpreting the TS footnote, and satisfies a PSE&G commitment to the NRC in letter dated October 28, 1999 (Our Ref. N990464). The current placement of the asterisk and its interpretation has resulted in compliance questions when penetrations containing an inoperable valve are reopened under administrative controls.

The Technical Specifications Bases are also revised as indicated in the marked-up TS Bases pages.

JUSTIFICATION OF REQUESTED CHANGES

As stated above, the current Salem TS places an asterisk over the word "OPERABLE" in the LCO statement. This asterisk is defined by a footnote at the bottom of the page. This particular placement of the asterisk has resulted in varying interpretations of the footnote's intent. Specifically, the placement of the asterisk by the word OPERABLE has lead to the interpretation that unisolating a containment isolation valve on an intermittent basis under administrative controls cannot be applied to the operable valve in the affected penetration while in the TS action statement. This interpretation implements restrictions that are more conservative than the actions required by NUREG 1431.

The Bases of NUREG 1431 state in part: "The ACTIONS are modified by a Note allowing penetration flow paths, except for [42] inch purge valve penetration flow paths, to be unisolated intermittently under administrative controls. These administrative controls consist of stationing a dedicated operator at the valve controls, who is in continuous communication with the control room."

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The administrative controls imposed by NUREG 1431 to open these valves on an intermittent basis are currently included in the Salem TS Bases. In addition to stationing a dedicated operator at the valve controls, who is in continuous communication with the control room, the Salem TS bases also require acceptable environmental conditions that would not preclude access to close these valves. The Salem Technical Specifications Bases is consistent with the NUREG 1431 bases.

The Salem TS LCO, applicability and action statements are also consistent with that of the NUREG 1431, except for the placement of the aforementioned footnote. NUREG 1431 places the footnote following the ACTION section, which clearly demonstrates that the intent is to provide the capability to unisolate a penetration flow path on an intermittent basis while in the action statement. Relocating the footnote in the Salem TS LCO to the ACTION section of TS would also provide a basis for unisolating the penetration consistent with NUREG 1431.

PSE&G recognizes that the one exception to this note is the supply and exhaust lines of the containment purge system. Because of their large size the purge valves may not be able to automatically close from their open position under design basis conditions. Therefore, these valves are maintained closed in MODES 1, 2, 3, and 4 to ensure the integrity of containment boundary. This restriction will continue to be controlled by TS 3.6.1.7 for both Salem Units 1 and 2.

CONCLUSIONS

The proposed change is consistent with NUREG 1431, Rev 1 (April 1995) Standard Technical Specifications Westinghouse Plants. The proposed change can be considered an editorial change in nature, since it only relocates the asterisk from the LCO to the ACTION and rewords the footnote to be consistent with NUREG 1431.

**ATTACHMENT II
PROPOSED AMENDMENT TO SALEM UNITS 1 AND 2
TECHNICAL SPECIFICATIONS (T.S.)
T.S. 3/4.6.3 CONTAINMENT ISOLATION VALVES
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10CFR50.92 EVALUATION

Public Service Electric & Gas (PSE&G) has concluded that the proposed changes to the Salem Generating Station Unit Nos. 1 and 2 TS do not involve a significant hazards consideration. In support of this determination, an evaluation of each of the three standards set forth in 10CFR50.92 is provided below.

REQUESTED CHANGE

The proposed change revises Technical Specification (TS) Section 3/4.6.3. The proposed change deletes the asterisk (*) by the word OPERABLE in the limiting condition for operation (LCO) 3.6.3.1 and 3.6.3 for Salem Units 1 and 2 respectively. The proposed change relocates the asterisk's associated footnote from the bottom of the page to immediately following the ACTION section of the Technical Specification. The footnote will be also clarified, as indicated in INSERT A, to be consistent with TS 3.6.3 of NUREG 1431, Rev 1 (April 1995) "Standard Technical Specifications Westinghouse Plants."

The Technical Specifications Bases are revised as indicated in the marked-up TS Bases pages.

PSE& G views the proposed change as a change that is editorial in nature.

BASIS

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The current Salem Technical Specifications allows the use of administrative means to unisolate a containment isolation valve on an intermittent basis. The proposed change eliminates the potential for varying interpretations of the TS footnote by relocating it to the ACTION section of the Technical Specifications in accordance with the guidance of NUREG 1431, Rev 1 (April 1995) "Standard Technical Specifications Westinghouse Plants (NUREG 1431)." PSE& G views the proposed change as a change that is editorial in nature.

The proposed change does not delete any existing surveillance requirements or delete any requirements from the Limiting Condition for Operations (LCOs) or Action

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PROPOSED AMENDMENT TO SALEM UNITS 1 AND 2
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T.S. 3/4.6.3 CONTAINMENT ISOLATION VALVES
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Statements, and therefore does not reduce the actions that are currently taken in the TS to demonstrate operability of plant structures, systems, or components (SSCs). The proposed change continues to ensure the operability of the containment isolation valves, therefore ensuring that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment.

Since these changes do not modify any SSCs or reduce the current requirements for demonstrating operability of these SSCs, the proposed changes to the TS do not involve a significant increase in the probability or consequences of an accident previously evaluated in the Safety Analysis Report (SAR).

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment eliminates the potential for varying interpretations of the TS footnote by relocating it to the ACTION section of the Technical Specifications in accordance with the guidance of NUREG 1431, Rev 1 (April 1995) "Standard Technical Specifications Westinghouse Plants (NUREG 1431)."

The proposed change does not alter the physical configuration of the plant. The proposed change does not affect any systems, structures or components assumed to function in the accident analysis, or creates a new or different accident scenario. The proposed change to the TS does not affect the ability of the plant systems to meet their current TS requirements or design basis functions. Therefore, the proposed change does not increase the consequences of a malfunction of equipment important to safety previously evaluated in the SAR or create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed amendment eliminates the potential for varying interpretations of the TS footnote by relocating it to the ACTION section of the Technical Specifications in accordance with the guidance of NUREG 1431, Rev 1 (April 1995) "Standard Technical Specifications Westinghouse Plants." The proposed amendment does not change any testing acceptance criteria or modify any protective trip set point. The proposed change will continue to ensure that the containment atmosphere will be isolated from the

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T.S. 3/4.6.3 CONTAINMENT ISOLATION VALVES
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outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment.

There is no reduction in the current surveillance requirements required to demonstrate the operability of plant SSCs. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

CONCLUSION

Based on the above, PSE&G has determined that the proposed change does not involve a significant hazards consideration.

**ATTACHMENT III
PROPOSED AMENDMENT TO SALEM UNITS 1 AND 2
TECHNICAL SPECIFICATIONS (T.S.)
T.S. 3/4.6.3 CONTAINMENT ISOLATION VALVES
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TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES

The following TS for Facility Operating License No. DPR 70 are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
3.6.3.1	3/4 6-12
3/4.6.3	B3/4 6-3

The following TS for Facility Operating License No. DPR 75 are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
3.6.3.	3/4 6-14
3/4.6.1	B3/4 6-4

**ATTACHMENT III
PROPOSED AMENDMENT TO SALEM UNITS 1 AND 2
TECHNICAL SPECIFICATIONS (T.S.)
T.S. 3/4.6.3 CONTAINMENT ISOLATION VALVES
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INSERT A

NOTE

Penetration flow paths, except for the containment purge valves, may be unisolated intermittently under administrative controls.

ATTACHMENT III

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CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

=====

3.6.3.1 Each containment isolation valve shall be OPERABLE. (*)^e

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

INSERT A →

With one or more of the isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

=====

4.6.3.1.1 Each containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test and verification of isolation time.

* Normally closed or manual containment isolation valves may be opened on an intermittent basis under administrative control.

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CONTAINMENT SYSTEMS

3/4.6.3 CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3 Each containment isolation valve shall be OPERABLE. (*)^e

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

INSERT. A →

With one or more of the containment isolation valve(s) inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and either:

- a. Restore the inoperable valve(s) to OPERABLE status within 4 hours, or
- b. Isolate each affected penetration within 4 hours by use of at least one deactivated automatic valve secured in the isolation position, or
- c. Isolate each affected penetration within 4 hours by use of at least one closed manual valve or blind flange; or
- d. Be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.3.1 Each containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test and verification of isolation time.

* Normally closed or manual containment isolation valves may be opened on an intermittent basis under administrative control.

ATTACHMENT III

CONTAINMENT SYSTEMS

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BASES

3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analyses.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH minimum volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the accident analyses.

3/4.6.2.3 CONTAINMENT COOLING SYSTEM

The OPERABILITY of the containment cooling system ensures that adequate heat removal capacity is available when operated in conjunction with the containment spray systems during post-LOCA conditions.

The surveillance requirements for the service water accumulator vessels ensure each tank contains sufficient water and nitrogen to maintain water filled, subcooled fluid conditions in three containment fan coil unit (CFCU) cooling loops in response to a loss of offsite power, without injecting nitrogen covergas into the containment fan coil unit loops assuming the most limiting single failure. The surveillance requirement for the discharge valve response time test ensures that on a loss of offsite power, each discharge valve actuates to the open position in accordance with the design to allow sufficient tank discharge into CFCU piping to maintain water filled, subcooled fluid conditions in three CFCU cooling loops, assuming the most limiting single failure.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

(penetration flow paths)

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing a dedicated individual, who is in constant communication with the control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

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CONTAINMENT SYSTEMS

BASES

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

(penetration flow paths)

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing a dedicated individual, who is in constant communication with the control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that the environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water, and 3) corrosion of metals within containment. These hydrogen control systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA," March 1971.