

May 26, 2000

Mr. Harold W. Keiser
Chief Nuclear Officer & President
Nuclear Business Unit
Public Service Electric & Gas
Company
Post Office Box 236
Hancocks Bridge, NJ 08038

SUBJECT: SALEM NUCLEAR GENERATING STATION, UNIT NO. 1, ISSUANCE OF
AMENDMENT RE: EXIGENT REQUEST FOR CHANGES TO TECHNICAL
SPECIFICATIONS - POSITION INDICATION SYSTEM (TAC NO. MA8840)

Dear Mr. Keiser:

The Commission has issued the enclosed Amendment No. 230 to Facility Operating License No. DPR-70 for the Salem Nuclear Generating Station, Unit No. 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated May 3, 2000, as supplemented on May 19, 2000.

This amendment modifies the existing requirement under TS 3.1.3.2.1, Action a.1, to determine the position of Rod 1SB2 from once every 8 hours to within 8 hours following any movement of the rod until repair of the rod indication system is completed. This change is applicable for the remainder of Unit 1 Cycle 14, or until an outage of sufficient duration occurs, whereby the position indication system can be repaired.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/RA/

Robert J. Fretz, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-272

Enclosures: 1. Amendment No. 230 to
License No. DPR-70
2. Safety Evaluation

cc w/encls: See next page

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DATE	05/26/00	5/24/00	05/23/00		5/26/00

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 26, 2000

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Chief Nuclear Officer & President
Nuclear Business Unit
Public Service Electric & Gas
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Unit No. 1

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-272

SALEM NUCLEAR GENERATING STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 230
License No. DPR-70

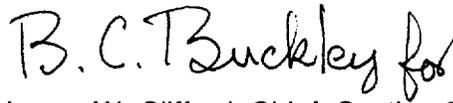
1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Public Service Electric & Gas Company, Philadelphia Electric Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) dated May 3, 2000, as supplemented on May 19, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-70 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 230, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: May 26, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 230

FACILITY OPERATING LICENSE NO. DPR-70

DOCKET NO. 50-272

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

3/4 1-18a

3/4 1-19

3/4 1-22

Insert Pages

3/4 1-18a

3/4 1-19

3/4 1-22

- a) A reevaluation of each accident analysis of table 3.1-1 is performed within 5 days; this reevaluation shall confirm that the previously analyzed results of these accidents remain valid for the duration of operation under these conditions.
- b) The SHUTDOWN MARGIN requirement of Specification 3.1.1.1 is determined at least once per 12 hours.
- c) A power distribution map is obtained from the movable incore detectors and $F_0(Z)$ $F_{\Delta H}^N$ are verified to be within their limits within 72 hours.
- d) The THERMAL POWER level is reduced to less than or equal to 75% of RATED THERMAL POWER within one hour and within the next 4 hours the high neutron flux trip setpoint is reduced to less than or equal to 85% of RATED THERMAL POWER. THERMAL POWER shall be maintained less than or equal to 75% of RATED THERMAL POWER until compliance with ACTIONS 3.1.3.1.c.3.a and 3.1.3.1.c.3.c above are demonstrated.

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The position of each full length rod shall be determined to be within the limits established in the limiting condition for operation at least once per 12 hours (allowing for one hour thermal soak after rod motion) except during time intervals when the Rod Position Deviation Monitor is inoperable, then verify the group positions at least once per 4 hours.*

4.1.3.1.2 Each full length rod not fully inserted in the core shall be determined to be OPERABLE by movement of at least 10 steps in any one direction at least once per 31 days.

* During Cycle 14, the position of Rod 1SB2 will be determined indirectly by the movable incore detectors within 8 hours following its movement until the repair of the indication system for this rod. During reactor startup, the fully withdrawn position of Rod 1SB2 will be determined by current traces and subsequently verified by the movable incore detectors prior to entry into Mode 1.

REACTIVITY CONTROL SYSTEMS

POSITION INDICATION SYSTEMS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.3.2.1 The shutdown and control rod position indication systems shall be OPERABLE and capable of determining the actual and demanded rod positions as follows:

- a. Analog rod position indicators, within one hour after rod motion (allowance for thermal soak);

All Shutdown Banks: ± 18 steps at $\leq 85\%$ reactor power or if reactor power is $> 85\%$ RATED THERMAL POWER ± 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 200-228 steps.

Control Bank A: ± 18 steps at $\leq 85\%$ reactor power or if reactor power is $> 85\%$ RATED THERMAL POWER ± 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 200-228 steps.

Control Bank B: ± 18 steps at $\leq 85\%$ reactor power or if reactor power is $> 85\%$ RATED THERMAL POWER ± 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 160-228 steps.

Control Bank C and D: ± 18 steps at $\leq 85\%$ reactor power or if reactor power is $> 85\%$ RATED THERMAL POWER ± 12 steps of the group demand counters for withdrawal ranges of 0-228 steps.

- b. Group demand counters; ± 2 steps of the pulsed output of the Slave Cyclor Circuit over the withdrawal range of 0-228 steps.

APPLICABILITY: MODES 1 and 2.

ACTION:

- a. With a maximum of one analog rod position indicator per bank inoperable either:
1. Determine the position of the non-indicating rod(s) indirectly by the movable incore detectors at least once per 8 hours* and within one hour after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of the rod's position, or
 2. Reduce THERMAL POWER to less than 50% of RATED THERMAL POWER within 8 hours.

* During Cycle 14, the position of Rod 1SB2 will be determined indirectly by the movable incore detectors within 8 hours following its movement until the repair of the indication system for this rod. During reactor startup, the fully withdrawn position will be determined by current traces and subsequently verified by the movable incore detectors prior to entry into Mode 1.

- b. With two or more analog rod position indicators per bank inoperable, within one hour restore the inoperable rod position indicator(s) to OPERABLE status or be in HOT STANDBY within the next 6 hours. A maximum of one rod position indicator per bank may remain inoperable following the hour, with Action (a) above being applicable from the original entry time into the LCO.

REACTIVITY CONTROL SYSTEMS

SHUTDOWN ROD INSERTION LIMIT

LIMITING CONDITION FOR OPERATION

=====

3.1.3.4 All shutdown rods shall be FULLY WITHDRAWN.

APPLICABILITY: MODES 1*, and 2*#@

ACTION:

With a maximum of one shutdown rod not FULLY WITHDRAWN, except for surveillance testing pursuant to Specification 4.1.3.1.2, within one hour either:

- a. FULLY WITHDRAW the rod, or,
- b. Declare the rod to be inoperable and apply Specification 3.1.3.1.

SURVEILLANCE REQUIREMENTS

=====

4.1.3.4 Each shutdown rod shall be determined to be FULLY WITHDRAWN by use of the group demand counters, and verified by the analog rod position indicators**,***:

- a. Within 15 minutes prior to withdrawal of any rods in control banks A, B, C, or D during an approach to reactor criticality, and
- b. At least once per 12 hours thereafter.

* See Special Test Exceptions 3.10.2 and 3.10.3

**For power levels below 50% one hour thermal "soak time" is permitted.

During this soak time, the absolute value of rod motion is limited to six steps.

*** During Cycle 14, the position of Rod 1SB2 will be determined indirectly by the movable incore detectors within 8 hours following its movement until the repair of the indication system for this rod. During reactor startup, the fully withdrawn position of Rod 1SB2 will be determined by current traces and subsequently verified by the movable incore detectors prior to entry into Mode 1.

With Keff greater than or equal to 1.0

@ Surveillance 4.1.3.4.a is applicable prior to withdrawing control banks in preparation for startup (Mode 2).



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 230 TO FACILITY OPERATING LICENSE NO. DPR-70

PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

SALEM NUCLEAR GENERATING STATION, UNIT NO. 1

DOCKET NO. 50-272

1.0 INTRODUCTION

By letter dated May 3, 2000 (Reference 1), as supplemented on May 19, 2000, the Public Service Electric and Gas Company (PSE&G), the licensee, submitted an exigent request for changes to the Salem Nuclear Generating Station, Unit No. 1 (Salem 1), Technical Specifications (TSs). The requested changes would reduce the frequency of flux mapping to determine the position of Control Rod 1SB2 while the rod position indication system for this control rod is inoperable. The licensee also stated that it would repair the rod position indication system at the end of Cycle 14, or earlier during an outage of sufficient duration, in a letter dated May 19, 2000 (Reference 2). The May 19, 2000, letter provided information that did not change the initial proposed no significant hazards consideration determination or expand the scope of the amendment.

2.0 BACKGROUND

On April 28, 2000, the rod position indication system for control rod 1SB2 indicated the control rod was fully inserted; however, the rod was confirmed to be fully withdrawn based on information from the movable incore detectors. Troubleshooting has determined that the position indication system cannot be repaired with the reactor at power, and most likely cannot be done until the reactor is in Mode 5. Personnel safety and ALARA (as low as reasonably achievable) occupational dose concerns prevent safe completion of repairs with the reactor at power. In the area where the repairs are needed, the dose rate is high (approximately 600 to 2400 mr/hr neutron and 200mr/hr gamma), the temperature is high (approximately 135 °F), lighting is poor, the clearance is tight (approximately a 20-inch clearance), and the work location is 30 feet in the air with no railing. The repair activities are estimated to take 1 hour which exceeds the 15 minutes stay time permitted for this environment.

Salem 1 TSs require that, with one analog rod position indicator inoperable, either: (1) the position of the non-indicating rod be determined indirectly by the movable incore detectors once per 8 hours and within 1 hour of any motion that exceeds 24 steps, or (2) thermal power be reduced to less than 50 percent within 8 hours. Currently, PSE&G is using Option (1), which is a significant burden on personnel and the movable incore detectors. In order to meet the 8-hour requirement, a flux map is taken every 6 hours; therefore, approximately 120 flux maps will be taken each month. Continued operation in this manner for the remainder of the cycle may have a detrimental effect on the incore system, since the incore system was not intended to operate in this manner. This type of operation for the remainder of Cycle 14 will result in considerable wear and tear on the system and may result in malfunction as well.

The proposed TS changes would allow extension of the time to determine the position of Rod 1SB2 from once per 8 hours to within 8 hours following any movement of the rod until repair of the indication system is completed. Surveillance Requirements (SR) of TSs 4.1.3.1.1 and 4.1.3.4 would also be modified to require that the position of Rod 1SB2 be determined (by the incore system) only following movement of the rod until repair of the indication system is completed. During startup, the proposed TS changes allow the fully withdrawn position to be determined by stationary gripper coil traces and subsequently verified by the moveable incore detectors prior to entry into Mode 1.

3.0 EVALUATION

According to General Design Criterion (GDC) 13 (Reference 3), instrumentation to monitor variables and systems over their operating ranges during normal operation, anticipated operational occurrences, and accident conditions must be OPERABLE. TS 3.1.3.2.1 requires OPERABILITY of the control rod position indicators to determine control rod positions and thereby ensure compliance with the control rod alignment and insertion limits. The OPERABILITY, including position indication, of the shutdown and control rods is an initial assumption in all safety analyses that assume rod insertion upon reactor trip.

The control rod in question is Rod 1SB2, a shutdown bank rod which is required to be fully withdrawn when the reactor is critical. In order to evaluate the proposed TS changes, the following conditions were considered:

- Rod drop or rod misalignment during power operation
- Rod drop or rod misalignment during reactor startup
- Reactor trip

These are the only conditions that need to be considered since control rod 1SB2 will be fully withdrawn at all other times that the TS is applicable.

A full rod drop of Rod 1SB2 during power operation would be detectable by indications other than the position indication system. Such an event would cause an urgent failure alarm and a noticeable change in the core parameters as evidenced by the response of the excore detectors. Thus, the status of the 1SB2 individual rod position indication would not affect the operator's actions. Similarly, a rod misalignment, greater than that analyzed for, would also be detected by an urgent failure alarm and the response by the excore detectors. Therefore, the likelihood of an undetected rod drop or misalignment is considered negligible.

Since the neutron flux is not adequate for the moveable incore detectors to determine rod position until sometime after entry into Mode 2, the initial verification of the fully withdrawn position for Rod 1SB2 will be determined by the stationary gripper coil traces. Using this method will allow startup and entry into Mode 2. As a second, diverse check, the moveable incore detectors will be used to verify rod position when neutron flux becomes adequate. Following verification that the rod is fully withdrawn, a rod misalignment or drop would be detectable by the urgent failure alarm and the excore signals. Therefore, the likelihood of an undetected rod drop or misalignment during startup is considered negligible.

Following a reactor trip, the rod position indication system is used to verify that all rods have been fully inserted. The position indication system has been modified to show Rod 1SB2 is in the fully withdrawn position. Upon trip, emergency boration is required if more than one rod fails to fully insert. Since Rod 1SB2 will not show fully inserted, emergency boration would be initiated if one rod other than 1SB2 does not fully insert. Since there is no reason to believe that Rod 1SB2 would not be fully inserted, this is clearly a conservative and, therefore, an acceptable approach.

The Nuclear Regulatory Commission (NRC) staff has reviewed all the material submitted and performed an assessment of the conditions. We agree that personnel safety and ALARA concerns prevent safe completion of repairs with the reactor at power and that constant use of the incore detector system is not advisable. The proposed TS changes provide adequate controls to ensure that the rod position is known and to ensure that rod misalignment is detectable. Since the increase in the likelihood of an undetected rod drop or misalignment is determined to be negligible, the integrity of the accident analysis is maintained.

3.1 Technical Specification Changes

TS SRs 4.1.3.1.1 and 4.1.3.4, and TS 3.1.3.2.1, Action a:

The changes add a footnote which states that for Cycle 14 the position of Rod 1SB2 will be determined indirectly by the movable incore detectors within 8 hours following its movement until the repair of the indication system for this rod. In addition, the footnote states that, during reactor startup, the fully withdrawn position will be determined by current traces and subsequently verified by the movable incore detectors prior to entry into Mode 1. These changes are acceptable since the location of Rod 1SB2 will be known at all times by means other than the normal rod position indication system and that the licensee has committed to repair the system during the first shutdown/outage of sufficient duration.

3.2 Staff's Conclusion

Based on its review, the staff concludes that the proposed Technical Specification changes are acceptable for the remainder of Cycle 14.

4.0 STATEMENT OF EXIGENT CIRCUMSTANCES

In its letter dated May 3, 2000, the licensee requested that the license amendment be reviewed and approved on an exigent basis in accordance with 10 CFR 50.91(a)(6). In its application, PSE&G stated that the position indication system cannot be repaired with the reactor at power.

Personnel safety and concerns over occupational exposure to radiation doses prevent the safe completion of repairs while operating at power. The licensee also stated that the April 28, 2000, failure was unexpected and has resulted in a significant burden to plant operations personnel as well as the movable incore detectors. PSE&G is concerned that operation of the Unit 1 flux mapping system, by as much as 120 times per month to comply with compensatory actions required by the TS, may have detrimental effects, such as increased wear and tear, on the incore system. Since the incore system was not designed to operate in this manner, an increased risk of significant equipment malfunction may further challenge the licensee's ability to perform other TS surveillances for which the incore system is normally used.

Based upon its review, the NRC staff finds that exigent circumstances exist and that this situation was not the result of actions taken, or the failure to take actions, by the licensee. The staff agrees that there is reasonable concern that there may be an increased risk of malfunction to the movable incore detectors as a result of significantly increased usage, and that it is prudent to minimize further challenges to equipment that is required for other TS SRs.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State official was notified of the proposed issuance of the amendment. The State official had no comments.

6.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Pursuant to 10 CFR 50.91(a)(6) for amendments to be granted under exigent circumstances, the NRC staff must determine that the amendment request involves no significant hazards consideration. Under the Commission's regulations in 10 CFR 50.92, this means that operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

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

The proposed change reduces the frequency of verifying the position of one non-indicating rod using the movable incore detectors and allows a different means of verifying rod position during reactor startup. The inoperability of the normal position indicating system does not affect the probability of a rod drop, a rod misalignment, or any other analyzed accident.

The inoperability of the rod position indicator eliminates one means of detecting a rod drop or rod misalignment. Failure to detect a misaligned rod could affect the initial conditions of the accident analysis and thereby affect the consequences. Based upon the other means available for detecting rod drops and misalignment (e.g., the urgent failure alarm), the increase in the likelihood of an undetected rod drop or misalignment is considered to be negligible. As a result, the initial conditions of the accident analysis are preserved and the consequences of previously analyzed accidents are unaffected.

Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The change will not introduce any new accident initiators. The change only allows an extension to the previously approved frequency for verifying rod position for one non-indicating rod and allows a different means of verifying rod position during reactor startup.

Therefore, the change does not 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 change reduces the frequency of verifying the position of one non-indicating rod using the movable incore detectors and allows a different means of verifying rod position during reactor startup. The inoperability of the rod position indicator eliminates one means of detecting a rod drop or rod misalignment. Failure to detect a misaligned rod could affect the initial conditions of the accident analysis and thereby affect the associated margins of safety. Based upon the other means available for detecting rod drops and misalignment (e.g., the urgent failure alarm), the increase in the likelihood of an undetected rod drop or misalignment is considered to be negligible. As a result, the initial conditions of the accident analysis are preserved and the margins of safety are unaffected.

Therefore, the change does not involve a significant reduction in a margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, concludes that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff has made a final determination that the amendment request involves no significant hazards consideration.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20, and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (65 FR 30137). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

8.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: M. Chatterton, SRXB

Date: May 26, 2000

9.0 REFERENCES

1. Letter from M.B. Bezilla, Public Service Electric & Gas Company to NRC, dated May 3, 2000.
2. Letter from M.B. Bezilla, Public Service Electric & Gas Company to NRC, dated May 19, 2000.
3. Title 10 of the Code of Federal Regulations, Part 50, Appendix A, General Design Criterion 13.