PSEG

Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038-0236

Nuclear Business Unit

LRN-00-0146
LCR S99-19

MAY 31 2000

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

SUPPLEMENTAL INFORMATION FOR RADIOACTIVE EFFLUENT TECHNICAL SPECIFICATION CHANGE REQUEST, SALEM GENERATING STATION UNIT NOS. 1 AND 2 FACILITY OPERATING LICENSES DPR-70 AND DPR-75 DOCKET NOS. 50-272 AND 50-311

In accordance with 10CFR50.90, on January 24, 2000 Public Service Electric & Gas Company (PSE&G) submitted Salem License Change Request (LCR) S99-19 (ref. letter LRN-99-0402) requesting a revision to the Technical Specifications (TS) for the Salem Generating Station Units No 1 and 2. The changes proposed in this submittal consist of revisions to the Radioactive Effluent Technical Specifications (RETS) and Administrative Controls consistent with NRC Generic Letter (GL) 89-01.

On March 15, 2000 a phone conference was held between the NRC and PSE&G to address clarifying questions that arose as a result of the NRC's review of LCR S99-19. This phone conference was documented in a memorandum dated March 30, 2000 from Jack N. Donohew, Project Directorate IV-2, to the Docket File. This letter provides additional information to address those questions not resolved during that phone conference. The unresolved questions and PSE&G's responses to those questions are provided in Attachment 1.

This supplement also provides marked up pages for Salem Units 1 and 2 Technical Specification 3.3.3.8, Radioactive Effluent Monitoring Instrumentation, Limiting Condition For Operation, to correct a reference to "Specification 3.11.1.1", which will become

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C Mr. H. J. Miller, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. R. Fretz, Licensing Project Manager - Salem
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 4D3
Rockville, MD 20852

Mr. S. Morris (X24)
USNRC Senior Resident Inspector - Salem

Mr. K. Tosch, Manager IV
Bureau of Nuclear Engineering
33 Arctic Parkway
CN 415
Trenton, NJ 08625

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"ODCM Control 3.11.1.1" upon approval of LCR S99-19. This is a change in terminology only and does not alter the conclusions reached in the 10CFR50.92 No Significant Hazards analysis submitted with the original LCR S99-19. The marked up pages are provided in Attachment 2.

Additionally, a portion of the marked up text for Salem Unit 1 and 2 Technical Specification 3.3.3.9, Radioactive Gaseous Effluent Oxygen Monitoring Instrumentation, was cut off during photocopying of the original submittal. The complete markup of these pages for Salem Unit 1 and 2 is also provided in Attachment 2.

In the original submittal for LCR S99-19, PSE&G requested that the amendment be made effective on the date of issuance and that an implementation period of 60 days be allowed to provide sufficient time for associated administrative activities. Because of the large scope of administrative activities required to implement this amendment, PSE&G requests that an implementation period of 120 days be allowed vice the originally requested 60 days.

Should you have any questions regarding this request, please contact Brooke Knieriem, Licensing, at (856) 339-1782.

Sincerely,

M. B. Bezilla
Vice President – Operations

/rbk
Affidavit

C Mr. H. J. Miller, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

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

M. B. Bezilla

Subscribed and Sworn to before me
this 30th day of May, 2000

Jennifer M. Turner

Notary Public of New Jersey

My Commission expires on _____

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

Attachment 1

NRC Question 1

May I have a copy of the PCP that clearly shows the changes from the relocation of requirements from the Salem 1/2 Technical Specifications (TSs)? [Only pages showing what has changed because of the implementation of GL 89-01 are needed.]

PSE&G Response to NRC Question 1

Changes to the PCP from the relocation of requirements from the TS have not been completed. PSE&G will revise the PCP during the amendment implementation period of LCR S99-19, which will occur within 120 days after the amendment is approved.

NRC Question 4

The chemical waste basin line is in Tables 3.3-12 and 4.3-12 for only Unit 2. Should not the ODCM have "(Unit 2)" added to these tables in the ODCM to show that line applies only to Unit 2 or are you applying the requirements in these tables to that same line in Unit 1 also?

PSE&G Response to NRC Question 4

The wording of ODCM Tables 3.3-12 and 4.3-12 is correct. The chemical waste basin line instrumentation referenced in ODCM Tables 3.3-12 and 4.1-12 is common to both Salem Units and no annotation is required.

NRC Question 5

For notes (2).3 and (2).4 in ODCM Table 4.3-12, "{Unit 1}" should be listed and not "{Unit 2}." These notes are only in the Unit 1 TS.

PSE&G Response to NRC Question 5

PSE&G concurs with this comment. Notes (2).3 and (2).4 in ODCM Table 4.3-12 should only refer to Unit 1. PSE&G will correct this error in the ODCM during the amendment implementation period for LCR S99-019, which will occur within 120 days after the amendment is approved.

Attachment 1

NRC Question 6

For ODCM Table 4.3-12, where does the second note # ("The 2R18 channel is an off-line which ... a CHANNEL CHECK for compliance purposes.) come from? The first note # comes from TS Tables 4.3-12 for the two units.

PSE&G Response to NRC Question 6

The reference to "2R18 channel" means the R18 channel for Unit 2. This note is in the Unit 2 TS. The two notes # in the Table Notation of ODCM Table 4.3-12 that are related to the 1R18 and 2R18 radiation monitor channels incorrectly refer to a CHANNEL CHECK vice a SOURCE CHECK. PSE&G will correct this error in the ODCM during the amendment implementation period of LCR S99-19, which will occur within 120 days after the amendment is approved.

NRC Question 9

In the proposed change to Specification 6.13.2 on the PCP, why are you listing regulations that the PCP must meet instead of stating the words in the GL that refer to the "existing requirements to federal, state, or other applicable regulations." We request that you use the words in the GL and revise your proposal for this specification.

PSE&G Response to NRC Question 9

The correct wording for Specification 6.13.2, in accordance with GL 89-01, has been provided in a separate supplement (PSE&G letter LRN-00-109, dated April 19, 2000).

NRC Question 10

Controls 3.12.1 refers to Specification 6.8.4.g.h.1. The "g" in the specification being referenced is incorrect and should not be listed.

PSE&G Response to NRC Question 10

PSE&G concurs with this comment. ODCM Control 3.12.1 incorrectly refers to "TS 6.8.4.g.h.1" vice "TS 6.8.4.h.1". PSE&G will correct this error in the ODCM during the amendment implementation period of LCR S99-19, which will occur within 120 days after the amendment is approved.

Attachment 1

NRC Question 11

In ODCM Table 3.12-1 for direct radiation, the frequency of sampling and collection and the frequency of analysis was changed from "Monthly, Quarterly, or Semi-annually" to "Quarterly." Explain why this change is being made.

PSE&G Response to NRC Question 11

PSE&G is making this change so that the requirements of Salem ODCM Table 3.12-1 will be identical to the corresponding table in the Hope Creek ODCM. This change is being made to reflect that the Radiological Environmental Monitoring Program is conducted as a common program with Hope Creek because all three units share the same site boundary.

NRC Question 12

In ODCM Table 3.12-1 for surface, ground, and drinking water, the quantity of the sample given in the TS Table 3.12-1 (under the column for sampling and collection frequency) is not being relocated to the ODCM table. Explain why this change is being made.

PSE&G Response to NRC Question 12

PSE&G is making this change so that the requirements of Salem ODCM Table 3.12-1 will be identical to the corresponding table in the Hope Creek ODCM. This change is being made to reflect that the Radiological Environmental Monitoring Program is conducted as a common program with Hope Creek because all three units share the same site boundary.

NRC Question 13

In ODCM Table 3.12-1 for direct radiation, why is the outer ring of stations being changed from the 2- to 8-km range in the TS table 3.12-1 to the 6- to 8-km range in the ODCM table?

PSE&G Response to NRC Question 13

PSE&G is making this change so that the requirements of Salem ODCM Table 3.12-1 will be identical to the corresponding table in the Hope Creek ODCM. This change is being made to reflect that the Radiological Environmental Monitoring Program is

conducted as a common program with Hope Creek because all three units share the same site boundary.

NRC Question 14

Why were notes (c) for airborne radioiodine and particulates and (f) for background locations in TS Table 3.12-1 not relocated to the ODCM Table 3.12-1? These notes should be added to the ODCM table. Note (f) could be attached to the background locations listed in the ODCM table.

PSE&G Response to NRC Question 14

PSE&G is making this change so that the requirements of Salem ODCM Table 3.12-1 will be identical to the corresponding table in the Hope Creek ODCM. This change is being made to reflect that the Radiological Environmental Monitoring Program is conducted as a common program with Hope Creek because all three units share the same site boundary.

NRC Question 17

See question 9 above. In the proposed words for changes to the PCP for Specification 6.13.2, you have used the same text in the GL for changes to the ODCM for the text to address changes to the PCP. You need to use the GL text for a.2) for changes to the PCP. The reference to 20.106, 40CFR Part 190, 50.36a, and Appendix I to Part 50 apply to the ODCM not the PCP. I request that you propose the following words from the GL: 6.13.2.1.b) A determination that the change will maintain the overall conformance of the solidification waste product to existing requirements of federal, State or other applicable regulations.

PSE&G Response to NRC Question 17

The correct wording for Specification 6.13.2, in accordance with GL 89-01, has been provided in a separate supplement (PSE&G letter LRN-00-109, dated April 19, 2000).

NRC Question 18

For changes to the Bases for Specification 3/4.3.3.9 of the TS, the markup for Unit 1 shows text being deleted in the paragraph whereas the markup for Unit 2 does not show the same text being deleted. Why is this?

Attachment 1

PSE&G Response to NRC Question 18

The correct mark-up page for Salem Unit 2 TS Bases 3/4.3.3.9, has been provided in a separate supplement (PSE&G letter LRN-00-109, dated April 19, 2000).

NRC Question 19

Have the Controls and Surveillance Requirements in the ODCM and PCP been incorporated into the Unit 1/2 operating procedures?

PSE&G Response to NRC Question 19

PSE&G will revise all operating procedures affected by the changes to the Controls and Surveillance Requirements in the ODCM and PCP during the amendment implementation period of LCR S99-19, which will occur within 120 days after the amendment is approved.

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Attachment 2

Mark Up Pages For Salem Unit 1 and 2 Technical Specification 3.3.3.8 and Technical Specification 3.3.3.9

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE ~~with their alarm/trip setpoints set~~ to ensure that the limits of ~~Specification~~ ODCM control 3.11.1.1 are not exceeded. ~~The alarm/trip setpoints of these channels shall be determined in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).~~

APPLICABILITY: At all times.

ACTION:

Not USED

Delete

a. ~~With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay suspend the release of radioactive liquid effluents monitored by the affected channel or declare the channel inoperable or change the setpoint so it is acceptably conservative.~~

b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12. Exert best efforts to return the instrument to OPERABLE status within 30 days and, if unsuccessful, explain in the next ~~semi~~annual radioactive effluent release report why the inoperability was not corrected in a timely manner.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.8 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, ~~SOURCE CHECK~~, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-12.

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE ~~with their alarm/trip setpoints set~~ to ensure that the limits of ~~Specification~~ ODCM Control 3.11.1.1 are not exceeded. ~~The alarm/trip setpoints of these channels shall be determined in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).~~

APPLICABILITY: At all times.

ACTION: NOT USED

a. ~~With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay suspend the release of radioactive liquid effluents monitored by the affected channel or declare the channel inoperable or change the setpoint so it is acceptably conservative.~~ DELETE

b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-12. Exert best efforts to return the instrument to OPERABLE status within 30 days and, if unsuccessful, explain in the next ~~semi~~-annual radioactive effluent release report why the inoperability was not corrected in a timely manner.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.8 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, ~~source check~~, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-12.

RADIOACTIVE GASEOUS EFFLUENT OXYGEN MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.9 The radioactive gaseous effluent OXYGEN monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.2.5 are not exceeded. ~~The alarm/trip setpoints of these channels shall be determined in accordance with the ODCM.~~

APPLICABILITY: As shown in Table 3.3-13

ACTION:

a. With a radioactive gaseous effluent OXYGEN monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, ~~without delay suspend the release of radioactive gaseous effluents monitored by the affected channel or~~ declare the channel inoperable ~~or change the setpoint so it is acceptably conservative.~~ AND TAKE the ACTION SHOWN in Table 3.3-13.

b. With less than the minimum number of radioactive gaseous effluent OXYGEN monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-13. Exert best efforts to return the instrument to OPERABLE status within 30 days and, if unsuccessful, ~~explain in the next semi-annual radioactive effluent release report~~ why the inoperability was not corrected in a timely manner. prepare and submit a Special Report pursuant to Specification 6.9.2 to explain

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.9 Each radioactive gaseous effluent OXYGEN monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, ~~source check~~, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-13.

RADIOACTIVE GASEOUS EFFLUENT OXYGEN MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.9 The radioactive gaseous effluent OXYGEN monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.11.2.1.5 are not exceeded. ~~The alarm/trip setpoints of these channels shall be determined in accordance with the ODCM.~~

APPLICABILITY: As shown in Table 3.3-13

ACTION:

a. With a radioactive gaseous effluent OXYGEN monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, ~~without delay suspend the release of radioactive gaseous effluents monitored by the affected channel~~ or declare the channel inoperable ~~or change the setpoint so it is acceptably conservative.~~ AND take the ACTION shown in Table 3.3-13

b. With less than the minimum number of radioactive gaseous effluent oxygen monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-13. Exert best efforts to return the instrument to OPERABLE status within 30 days and, if unsuccessful, ~~explain in the next semi-annual radioactive effluent release report~~ prepare AND submit a Special Report pursuant to Specification 6.9.2 to explain why the inoperability was not corrected in a timely manner.

c. The provisions of Specifications 3.0.3 and 3.0.4, are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.9 Each radioactive gaseous effluent OXYGEN monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, ~~SOURCE CHECK~~, CHANNEL CALIBRATION, AND CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-13.