

March 11, 1991

Docket Nos. 50-272
and 50-311

Mr. Steven E. Miltenberger
Vice President and Chief Nuclear
Officer
Public Service Electric & Gas
Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Dear Mr. Miltenberger:

SUBJECT: REACTOR PROTECTION SYSTEM AND ENGINEERED SAFETY FEATURES
ACTUATION TRIP SETPOINTS, SALEM GENERATING STATION, UNIT NOS.
1 AND 2 (TAC NOS. 77581 AND 77582)

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Wanda Jones	
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The Commission has issued the enclosed Amendment Nos. 121 and 101 to Facility Operating License Nos. DPR-70 and DPR-75 for the Salem Generating Station, Unit Nos. 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 4, 1990 and supplemented by a letter dated January 29, 1991. The January 29, 1991 supplemental letter, applicable to Salem Unit 2 only, did not increase the scope of the original amendment request and did not affect the staff's original no significant hazards determination.

These amendments change the reactor protection system and engineered safety features actuation system trip setpoint for steam generator level low-low and for steam line pressure low. TS Section 2.2, Table 2.2-1 and Section 3/4.3.2, Table 3.3-4 are modified. You are requested to notify the Commission in writing, when the enclosed amendments are implemented at Salem 1 and 2.

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

Sincerely,

/S/

James C. Stone, Sr. Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No.121 to
License No. DPR-70
 2. Amendment No.101 to
License No. DPR-75
 3. Safety Evaluation
- cc w/enclosures:
See next page

OFC	: PDI-2/PM	: OGC	: PDI-2/D	:
NAME	: JSTONE:tlc	: WBUTLER	:	:
DATE	: 2/14/91	: 2/22/91	: 3/8/91	:

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Document Name: (TAC NOS. 77581/582)

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PDR ADOCK 05000272
PDR



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

March 11, 1991

Docket Nos. 50-272
and 50-311

Mr. Steven E. Miltenberger
Vice President and Chief Nuclear
Officer
Public Service Electric & Gas
Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Dear Mr. Miltenberger:

SUBJECT: REACTOR PROTECTION SYSTEM AND ENGINEERED SAFETY FEATURES
ACTUATION TRIP SETPOINTS, SALEM GENERATING STATION, UNIT NOS.
1 AND 2 (TAC NOS. 77581 AND 77582)

The Commission has issued the enclosed Amendment Nos. 121 and 101 to Facility Operating License Nos. DPR-70 and DPR-75 for the Salem Generating Station, Unit Nos. 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated September 4, 1990 and supplemented by a letter dated January 29, 1991. The January 29, 1991 supplemental letter, applicable to Salem Unit 2 only, did not increase the scope of the original amendment request and did not affect the staff's original no significant hazards determination.

These amendments change the reactor protection system and engineered safety features actuation system trip setpoints for steam generator level low-low and for steam line pressure low. TS Section 2.2, Table 2.2-1 and Section 3/4.3.2, Table 3.3-4 are modified. You are requested to notify the Commission in writing, when the enclosed amendments are implemented at Salem 1 and 2.

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

Sincerely,

A handwritten signature in cursive script that reads "James C. Stone".

James C. Stone, Sr. Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 121 to
License No. DPR-70
2. Amendment No. 101 to
License No. DPR-75
3. Safety Evaluation

cc w/enclosures:
See next page

Mr. Steven E. Miltenberger
Public Service Electric & Gas Company Salem Nuclear Generating Station

cc:

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Public Service Commission of Maryland
Engineering Division
ATTN: Chief Engineer
231 E. Baltimore Street
Baltimore, MD 21202-3486



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

PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-272

SALEM GENERATING STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 121
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 September 4, 1990 and supplemented by letter dated January 29, 1991 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:

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P PDR

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 121, 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 to be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects - I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 11, 1991

OFC	:PDI-2/LA	:PDI-2/PM	:OGC	:PDI-2/D
NAME	:MOORE	:JSTONE:tlc	:WBUTLER	
DATE	:2/16/91	:2/14/91	:2/22/91	:3/8/91

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Document Name: (TAC NOS. 77581/582)

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 121, 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 to be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects - I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 11, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 121

FACILITY OPERATING LICENSE NO. DPR-70

DOCKET NO. 50-272

Revise Appendix A as follows:

Remove Pages

2-6

3/4 3-25

3/4 3-26

Insert Pages

2-6

3/4 3-25

3/4 3-26

TABLE 2.2-1 (Continued)REACTOR TRIP SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUES</u>
13. Steam Generator Water Level--Low-Low	\geq 16% of narrow range instrument span--each steam generator	\geq 14.8% of narrow range instrument span--each steam generator
14. Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level	\leq 40% of full steam flow at RATED THERMAL POWER coincident with steam generator water level \geq 25% of narrow range instrument span--each steam generator	\leq 42.5% of full steam flow at RATED THERMAL POWER coincident with steam generator water level \geq 24% of narrow range instrument span--each steam generator
15. Undervoltage-Reactor Coolant Pumps	\geq 2900 volts--each bus	\geq 2850 volts--each bus
16. Underfrequency-Reactor Coolant Pumps	\geq 56.5 Hz - each bus	\geq 56.4 Hz - each bus
17. Turbine Trip		
A. Low Trip System Pressure	\geq 45 psig	\geq 45 psig
B. Turbine Stop Valve Closure	\leq 15% off full open	\leq 15% off full open
18. Safety Injection Input from SSPS	Not Applicable	Not Applicable
19. Reactor Coolant Pump Breaker Position Trip	Not Applicable	Not Applicable

TABLE 3.3-4 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUES</u>
2. Containment Atmosphere Gaseous Radioactivity	Per Table 3.3-6	
4. STEAM LINE ISOLATION		
a. Manual	Not Applicable	Not Applicable
b. Automatic Actuation Logic	Not Applicable	Not Applicable
c. Containment Pressure--High-High	≤ 23.5 psig	≤ 24 psig
d. Steam Flow in Two Steam Lines-- High Coincident with Tavg -- Low-Low or Steam Line Pressure -- Low	\leq A function defined as follows: A Δp corresponding to 40% of full steam flow between 0% and 20% load and then a Δp increasing linearly to a Δp corresponding to 110% of full steam flow at full load. Tavg $\geq 543^{\circ}\text{F}$ ≥ 600 psig steam line pressure	\leq A function defined as follows: A Δp corresponding to 44% of full steam flow between 0% and 20% load and then a Δp increasing linearly to a Δp corresponding to 111.5% of full steam flow at full load. Tavg $\geq 541^{\circ}\text{F}$ ≥ 579 psig steam line pressure

TABLE 3.3-4 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINTS</u>	<u>ALLOWABLE VALUES</u>
5. TURBINE TRIP AND FEEDWATER ISOLATION		
a. Steam Generator Water Level-- High-High	\leq 67% of narrow range instrument span each steam generator	\leq 68% of narrow range instrument span each steam generator
6. SAFEGUARDS EQUIPMENT CONTROL SYSTEM (SEC)	Not Applicable	Not Applicable
7. UNDERVOLTAGE, VITAL BUS		
a. Loss of Voltage	\geq 70% of bus voltage	\geq 65% of bus voltage
b. Sustained Degraded Voltage	\geq 91.6% of bus voltage for \leq 13 seconds	\geq 91% of bus voltage for \leq 15 seconds
8. AUXILIARY FEEDWATER		
a. Automatic Actuation Logic	Not Applicable	Not Applicable
b. Manual Initiation	Not Applicable	Not Applicable
c. Steam Generator Water Level-- Low-Low	\geq 16% of narrow range instrument span each steam generator	\geq 14.8% of narrow range instrument span each steam generator
d. Undervoltage - RCP	\geq 70% RCP bus voltage	\geq 65% RCP bus voltage
e. S.I.	See 1 above (All S.I. setpoints)	
f. Emergency Trip of Steam Generator Feedwater Pumps	Not Applicable	Not Applicable
g. Station Blackout	See 6 and 7 above (SEC and Undervoltage, Vital Bus)	



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

PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-311

SALEM GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 101
License No. DPR-75

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 September 4, 1990 and supplemented by letter dated January 29, 1991 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-75 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. 101, 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 to be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects - I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 11, 1991

OFC	: PDI-2/LA	: PDI-2/PM	: OGC	: PDI-2/D	:
NAME	: J. Brien	: JStone:tlc	: S. [Signature]	: WButler	:
DATE	: 2/12/91	: 2/14/91	: 2/22/91	: 3/8/91	:

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Document Name: (TAC NOS. 77581/582)

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 101, 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 to be implemented within 60 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Director
Project Directorate I-2
Division of Reactor Projects - I/II

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 11, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 101

FACILITY OPERATING LICENSE NO. DPR-75

DOCKET NO. 50-311

Revise Appendix A as follows:

Remove Pages

2-6

3/4 3-26

3/4 3-27

Insert Pages

2-6

3/4 3-26

3/4 3-27

TABLE 2.2-1 (Continued)

REACTOR TRIP SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUES</u>
13. Steam Generator Water Level--Low-Low	$\geq 16\%$ of narrow range instrument span--each steam generator	$\geq 14.8\%$ of narrow range instrument span--each steam generator
14. Steam/Feedwater Flow Mismatch and Low Steam Generator Water Level	$\leq 40\%$ of full steam flow at RATED THERMAL POWER coincident with steam generator water level $\geq 25\%$ of narrow range instrument span--each steam generator	$\leq 42.5\%$ of full steam flow at RATED THERMAL POWER coincident with steam generator water level $\geq 24\%$ of narrow range instrument span--each steam generator
15. Undervoltage-Reactor Coolant Pumps	≥ 2900 volts--each bus	≥ 2850 volts--each bus
16. Underfrequency-Reactor Coolant Pumps	≥ 56.5 Hz - each bus	≥ 56.4 Hz - each bus
17. Turbine Trip		
A. Low Trip System Pressure	≥ 45 psig	≥ 45 psig
B. Turbine Stop Valve Closure	$\leq 15\%$ off full open	$\leq 15\%$ off full open
18. Safety Injection Input from SSPS	Not Applicable	Not Applicable
19. Reactor Coolant Pump Breaker Position Trip	Not Applicable	Not Applicable

TABLE 3.3-4 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUES</u>
2. Containment Atmosphere Gaseous Radioactivity	Per Table 3.3-6	
4. STEAM LINE ISOLATION		
a. Manual	Not Applicable	Not Applicable
b. Automatic Actuation Logic	Not Applicable	Not Applicable
c. Containment Pressure--High-High	≤ 23.5 psig	≤ 24 psig
d. Steam Flow in Two Steam Lines-- High Coincident with T _{avg} -- Low-Low or Steam Line Pressure -- Low	\leq A function defined as follows: A Δp corresponding to 40% of full steam flow between 0% and 20% load and then a Δp increasing linearly to a Δp corresponding to 110% of full steam flow at full load. $T_{avg} \geq 543^{\circ}\text{F}$ ≥ 600 psig steam line pressure	\leq A function defined as follows: A Δp corresponding to 44% of full steam flow between 0% and 20% load and then a Δp increasing linearly to a Δp corresponding to 111.5% of full steam flow at full load. $T_{avg} \geq 541^{\circ}\text{F}$ ≥ 579 psig steam line pressure

TABLE 3.3-4 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUES</u>
5. TURBINE TRIP AND FEEDWATER ISOLATION		
a. Steam Generator Water Level-- High-High	≤ 67% of narrow range instrument span each steam generator	≤ 68% of narrow range instrument span each steam generator
6. SAFEGUARDS EQUIPMENT CONTROL SYSTEM (SEC)	Not Applicable	Not Applicable
7. UNDERVOLTAGE, VITAL BUS		
a. Loss of Voltage	≥ 70% of bus voltage	≥ 65% of bus voltage
b. Sustained Degraded Voltage	≥ 91.6% of bus voltage for ≤ 13 seconds	≥ 91% of bus voltage for ≤ 15 seconds
8. AUXILIARY FEEDWATER		
a. Automatic Actuation Logic	Not Applicable	Not Applicable
b. Manual Initiation	Not Applicable	Not Applicable
c. Steam Generator Water Level-- Low-Low	≥ 16% of narrow range instrument span each steam generator	≥ 14.8% of narrow range instrument span each steam generator
d. Undervoltage - RCP	≥ 70% RCP bus voltage	≥ 65% RCP bus voltage
e. S.I.	See 1 above (All S.I. setpoints)	
f. Trip of Main Feedwater Pumps	Not Applicable	Not Applicable
9. SEMIAUTOMATIC TRANSFER TO RECIRCULATION		
a. RWST Low Level	15.25 ft above instrument taps	15.25 ± 1 ft. above instrument taps
b. Automatic Actuation Logic	Not Applicable	Not Applicable

SALEM - UNIT 2

3/4 3-27

Amendment No. 101,



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NOS. 121 AND 101 TO FACILITY OPERATING
LICENSE NOS. DPR-70 AND DPR-75
PUBLIC SERVICE ELECTRIC & GAS COMPANY
PHILADELPHIA ELECTRIC COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY
SALEM GENERATING STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

1.0 INTRODUCTION

By letter dated September 4, 1990 and supplemented by letter dated January 29, 1991, the licensee requested an amendment to the Facility Operating Licenses for the Salem Nuclear Generating Station, Units No. 1 and 2. The January 29, 1991 supplemental letter provided a new marked up page for the Salem Unit 2 Technical Specifications that included all previous revisions. This supplement did not increase the scope of the original amendment request and did not affect the staff's original no significant hazards determination. The requested amendment would revise the Reactor Protection System (RPS) setpoints for Steam Generator Level Low-Low and for Steam Line Pressure Low.

To support these Technical Specification changes, the licensee submitted the following:

1. Description and Justification of changes.
2. Revised Technical Specification pages
3. Justification for Salem Past and Continued Operation (Westinghouse Report S-C-RPC-CEE-0309-1)

2.0 DISCUSSION & EVALUATION

In November 1981, the Salem Technical Specification specified that the Steam Generator Level Low - Low Trip setpoint for the Reactor Protection System and Engineering Safety Features Actuation System was 18% of span, with an allowable value of 17% of span. In May 1983, with the addition of reference leg insulation and transmitter changes, the Technical Specification was amended to change the Steam Generator Level Low - Low Trip. That amendment incorporated the setpoint value of 8.5% of span for trip with an allowable value of 7.5% of span.

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The recent development of setpoint methodology by Westinghouse has identified additional uncertainties in the instrument loop. Replacement of components and changes to the setpoint methodology necessitated the increase from the previous trip setpoint to 14% span as calculated by Westinghouse. The allowable value also changed to 12.8% span. The largest single contribution to the channel statistical accuracy (CSA) is due to environmental allowance. Without an adverse environment, CSA is only 3.7% span. The additional increase from 14% span to 16% span is due to a reference leg heat up error of 2%.

The steam line pressure low trip is also changed due to the additional uncertainties in the instrument loop.

The proposed changes revise Technical Specification Section 2.2, Table 2.2-1 and Section 3/4.3.2, Table 3.3-4.

The changes are as follows:

A. Steam Generator Level Low-Low setpoint

	Previous	New
Setpoint	8.5% span	16% span
Allowable Value	7.5% span	14.8% span

B. Steam Generator Pressure - low setpoint

	Previous	New
Setpoint	500 psig	600 psig
Allowable Value	480 psig	579 psig

The staff has evaluated and reviewed the licensee's request and found these changes are in a more conservative direction and more accurately reflect instrument uncertainties. Implementation of the proposed change does not involve modification of any existing equipment system or components.

Based on our review of the licensee's submittal, the staff concludes that this Technical Specification change more accurately includes uncertainties in the setpoints for steam generator low-low level and low pressure will have a favorable impact upon the safety of the plant, and is therefore acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve 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 amendments involve no such finding. Accordingly, the amendments meet 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 amendments.

4.0 CONCLUSION

The Commission made a proposed determination that the amendments involve no significant hazards consideration which was published in the Federal Register (55 FR 53075) on December 26, 1990 and consulted with the State of New Jersey. No public comments were received and the State of New Jersey did not have any comments.

The staff 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security nor to the health and safety of the public.

Dated: March 11, 1991

Principal Contributor: D. Nguyen