March 11, 1996

Mr. Leon R. Eliason
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 NOS. 1 AND 2 (TAC NOS. M89238 AND M89239)

Dear Mr. Eliason:

The Commission has issued the enclosed Amendment Nos. 181 and 162 to Facility Operating License Nos. DPR-70 and DPR-75 for the Salem Nuclear Generating Station, Unit Nos. 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated April 13, 1994, as supplemented December 6, 1995.

These amendments revise the Quality Assurance audit frequencies in the Salem Unit Nos. 1 and 2 TSs. These revisions will permit an audit frequency based on performance and transfer subsequent control over the audit program to the Updated Final Safety Analysis Report.

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/
Leonard N. Olshan, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-272/311

Enclosures: 1. Amendment No. 181 to License No. DPR-70
2. Amendment No. 162 to License No. DPR-75
3. Safety Evaluation

cc w/encls: See next page

J. Shannon, RGN-I

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

March 11, 1996

Mr. Leon R. Eliason
Chief Nuclear Officer & President-
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Office of Nuclear Reactor Regulation

Docket Nos. 50-272/311

Enclosures:
1. Amendment No. 181 to License No. DPR-70
2. Amendment No. 162 to License No. DPR-75
3. Safety Evaluation

cc w/encls: See next page

Mr. Leon R. Eliason
Public Service Electric & Gas
Company

Salem Nuclear Generating Station,
Units 1 and 2

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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. 181
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 April 13, 1994, as supplemented December 6, 1995, 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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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 181 , 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 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: March 11, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 181

FACILITY OPERATING LICENSE NO. DPR-70

DOCKET NO. 50-272

Revise Appendix A as follows:

Remove Pages	Insert Pages
6-9	6-9
6-12	6-12
6-13	6-13
6-17	6-17

QUORUM (continued)

shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The Station Operations Review Committee shall be responsible for:

a. Review of: (1) Upper tier administrative procedures within the scope of Regulatory Guide 1.33 (2/78), and changes thereto and (2) Newly created procedures or changes to existing procedures that require a 10CFR50.59 safety evaluation as described in Section 6.5.3.2.d.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to Appendix "A" Technical Specifications.

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

e. Review of the safety evaluations that have been completed under the provisions of 10CFR50.59.

f. Investigation of all violations of the Technical Specifications including the reports covering evaluation and recommendations to prevent recurrence.

g. Review of all REPORTABLE EVENTS.

h. Review of facility operations to detect potential nuclear safety hazards.

i. Performance of special reviews, investigations or analyses and reports thereon as requested by the General Manager - Salem Operations.

j. Not used.

k. Not used.

l. Review of the Fire Protection Program and implementing procedures and changes thereto that require a 10CFR50.59 safety evaluation.

REVIEW

6.5.2.4.2 The OSR staff shall review:

a. The safety evaluations for changes to procedures, equipment, or systems; and tests or experiments completed under the provisions of 10CFR50.59, to verify that such actions did not constitute an unreviewed safety question;

b. Proposed changes to procedures, equipment, or systems, and tests or experiments that involve an unreviewed safety question as defined in 10CFR50.59;

c. Proposed changes to Technical Specifications or to the Operating License;

d. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;

e. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety;

f. All REPORTABLE EVENTS;

g. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems or components that could affect nuclear safety;

h. Reports and meeting minutes of the Station Operations Review Committee.

AUDITS

6.5.2.4.3 Audits of facility activities shall be performed under the cognizance of the OSR staff. These audits shall encompass the following:

a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.

b. The performance, training, and qualifications of the entire facility staff.

c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety.

d. The performance of activities required by the Operational Quality Assurance Program to meet the Criteria of Appendix B to 10CFR50.

AUDITS (continued)

e. Not used.

f. Not used.

g. Any other area of facility operation considered appropriate by the Director - Quality Assurance and Nuclear Safety Review or the Chief Nuclear Officer and President - Nuclear Business Unit.

h. The Facility Fire Protection Program and implementing procedures.

i. An audit of the fire protection and loss prevention program implementation utilizing an outside independent fire protection consultant.

j. The radiological environmental monitoring program and the results thereof.

The above audits may be conducted by the Quality Assurance Department or an independent consultant. Audit plans and final audit reports shall be reviewed by the OSR staff.

RECORDS AND REPORTS

6.5.2.4.4 Records of OSR activities shall be maintained. Reports of reviews and audits shall be prepared and distributed as indicated below:

a. The results of reviews performed pursuant to Section 6.5.2.4.2 shall be reported to the Chief Nuclear Officer and President - Nuclear Business Unit at least monthly.

b. Audit reports prepared pursuant to Section 6.5.2.4.3 shall be forwarded by the auditing organization to the Chief Nuclear Officer and President - Nuclear Business Unit and to the management positions responsible for the areas audited (1) within 30 days after completion of the audit for those audits conducted by the Quality Assurance Department, and (2) within 60 days after completion of the audit for those audits conducted by an independent consultant.

6.5.2.5 ON-SITE SAFETY REVIEW GROUP (SRG)

FUNCTION

6.5.2.5.1 The On-Site Safety Review Group (SRG) shall function to provide: the review of plant design and operating experience for potential opportunities to improve plant safety; the evaluation of plant operations and

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

b. Refueling operations.

c. Surveillance and test activities of safety related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. OFFSITE DOSE CALCULATION MANUAL implementation.

i. Quality Assurance Program for effluent and environmental monitoring.

6.8.2 Each procedure and administrative policy of 6.8.1 above, except 6.8.1.d and 6.8.1.e, and changes thereto, shall be reviewed and approved in accordance with Specification 6.5.1.6 or 6.5.3, as appropriate, prior to implementation and reviewed periodically as set forth in administrative procedures. Procedures of 6.8.1.d and 6.8.1.e shall be reviewed and approved in accordance with the Facility's Security and Emergency Plans or 6.5.3, as appropriate, prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 On-the-spot changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented and receives the same level of review and approval as the original procedure under Specification 6.5.3.2a within 14 days of implementation.

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. 50-311

SALEM NUCLEAR GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 162
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 April 13, 1994, as supplemented December 6, 1995, 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. 162 , 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 60 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: March 11, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 162

FACILITY OPERATING LICENSE NO. DPR-75

DOCKET NO. 50-311

Revise Appendix A as follows:

Remove Pages	Insert Pages
6-9	6-9
6-12	6-12
6-13	6-13
6-17	6-17

RESPONSIBILITIES

6.5.1.6 The Station Operations Review Committee shall be responsible for:

a. Review of: (1) Upper tier administrative procedures within the scope of Regulatory Guide 1.33 (2/78), and changes thereto and (2) Newly created procedures or changes to existing procedures that require a 10CFR50.59 safety evaluation as described in Section 6.5.3.2.d.

b. Review of all proposed tests and experiments that affect nuclear safety.

c. Review of all proposed changes to Appendix "A" Technical Specifications.

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.

e. Review of the safety evaluations that have been completed under the provisions of 10CFR50.59.

f. Investigation of all violations of the Technical Specifications including the reports covering evaluation and recommendations to prevent recurrence.

g. Review of all REPORTABLE EVENTS.

h. Review of facility operations to detect potential nuclear safety hazards.

i. Performance of special reviews, investigations or analyses and reports thereon as requested by the General Manager - Salem Operations.

j. Not used.

k. Not used.

l. Review of the Fire Protection Program and implementing procedures and changes thereto that require a 10CFR50.59 safety evaluation.

m. Review of all unplanned on-site releases of radioactivity to the environs including the preparation of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence.

REVIEW

6.5.2.4.2 The OSR staff shall review:

a. The safety evaluations for changes to procedures, equipment, or systems; and tests or experiments completed under the provisions of 10CFR50.59, to verify that such actions did not constitute an unreviewed safety question;

b. Proposed changes to procedures, equipment, or systems; and tests or experiments that involve an unreviewed safety question as defined in 10CFR50.59;

c. Proposed changes to Technical Specifications or to the Operating License;

d. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;

e. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety;

f. All REPORTABLE EVENTS;

g. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems or components that could affect nuclear safety;

h. Reports and meeting minutes of the Station Operations Review Committee.

AUDITS

6.5.2.4.3 Audits of facility activities shall be performed under the cognizance of the OSR staff. These audits shall encompass the following:

a. The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions.

b. The performance, training, and qualifications of the entire facility staff.

c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety.

d. The performance of activities required by the Operational Quality Assurance Program to meet the Criteria of Appendix B to 10CFR50.

AUDITS (continued)

e. Not used.

f. Not used.

g. Any other area of facility operation considered appropriate by the Director - Quality Assurance and Nuclear Safety Review or the Chief Nuclear Officer and President - Nuclear Business Unit.

h. The Facility Fire Protection Program and implementing procedures.

i. An audit of the fire protection and loss prevention program implementation utilizing an outside independent fire protection consultant.

j. The radiological environmental monitoring program and the results thereof.

The above audits may be conducted by the Quality Assurance Department or an independent consultant. Audit plans and final audit reports shall be reviewed by the OSR staff.

RECORDS AND REPORTS

6.5.2.4.4 Records of OSR activities shall be maintained. Reports of reviews and audits shall be prepared and distributed as indicated below:

a. The results of reviews performed pursuant to Section 6.5.2.4.2 shall be reported to the Chief Nuclear Officer and President - Nuclear Business Unit at least monthly.

b. Audit reports prepared pursuant to Section 6.5.2.4.3 shall be forwarded by the auditing organization to the Chief Nuclear Officer and President - Nuclear Business Unit and to the management positions responsible for the areas audited (1) within 30 days after completion of the audit for those audits conducted by the Quality Assurance Department, and (2) within 60 days after completion of the audit for those audits conducted by an independent consultant.

6.5.2.5 ON-SITE SAFETY REVIEW GROUP (SRG)

FUNCTION

6.5.2.5.1 The On-Site Safety Review Group (SRG) shall function to provide: the review of plant design and operating experience for potential opportunities to improve plant safety; the evaluation of plant operations and

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

b. Refueling operations.

c. Surveillance and test activities of safety related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. OFFSITE DOSE CALCULATION MANUAL implementation.

i. Quality Assurance Program for effluent and environmental monitoring.

6.8.2 Each procedure and administrative policy of 6.8.1 above, except 6.8.1.d and 6.8.1.e, and changes thereto, shall be reviewed and approved in accordance with Specification 6.5.1.6 or 6.5.3, as appropriate, prior to implementation and reviewed periodically as set forth in administrative procedures. Procedures of 6.8.1.d and 6.8.1.e shall be reviewed and approved in accordance with the Facility's Security and Emergency Plans or 6.5.3, as appropriate, prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 On-the-spot changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented and receives the same level of review and approval as the original procedure under Specification 6.5.3.2a within 14 days of implementation.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 181 AND 162 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 NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-272 AND 50-311

1.0 INTRODUCTION

By letter dated April 13, 1994, as supplemented December 6, 1995, the Public Service Electric & Gas Company (the licensee) submitted a request for changes to the Salem Nuclear Generating Station, Unit Nos. 1 and 2, Technical Specifications (TS). The requested changes would revise the Administrative Controls Section of the TS and revise the Updated Final Safety Analysis Report (UFSAR) Section 1.8 (conformance to Regulatory Guides [RG]), 13.4.2 (Audits), and 17.2 (Quality Assurance Audits). The December 6, 1995, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination nor the original Federal Register notice.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include TS as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993), in which

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the Commission indicated that compliance with the Final Policy Statement satisfies §182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TS to licensee-controlled documents, consistent with the standard enunciated in Portland General Electric Co. (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety."

Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether particular limiting conditions for operation are required to be included in the TS, as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. The Commission recently adopted amendments to 10 CFR 50.36, pursuant to which the rule was revised to codify and incorporate these criteria. See Final Rule, "Technical Specifications," 60 FR 36593 (July 19, 1995). As a result, TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other licensee-controlled documents.

The Commission's policy statement provides that many of the existing TS limiting conditions for operation which do not satisfy these four specified criteria may be relocated to the Updated Safety Analysis Report (USAR), such that future changes could be made to these provisions pursuant to 10 CFR 50.59. Other requirements may be relocated to more appropriate documents (e.g. Security Plan, Quality Assurance (QA) plan, and Emergency Plan) and controlled by the applicable regulatory requirement. While the content of the TS administrative controls is specified in 10 CFR 50.36(c)(5), particular details of the administrative controls may be relocated to licensee-controlled documents where §50.59 or comparable regulatory controls exist.

Administrative controls in existing TS related to the review and audit functions, including specified frequency provisions, should be relocated to a licensee-controlled document that provides adequate control over changes to

these provisions and which provides an appropriate change control mechanism. As such, these review and audit provisions should be relocated to the Quality Assurance Program described or referenced in the facility's USAR and controlled pursuant to 10 CFR 50.54.

3.0 EVALUATION

The licensee proposed that the review and audit functions and frequencies specified in existing TS 6.5.2.4.3, including specific audit requirements for the Fire Protection program, be relocated from the TS to the Quality Assurance Program (QAP) UFSAR, Chapter 17, such that future changes could be made pursuant to 10 CFR 50.54(a). These particular TS provisions are not necessary to assure safe operation of the facility, given that the requirements in the QA program implement the Commission's regulations pertaining to these review and audit functions as set forth below. The review and audit functions define an administrative framework to confirm that plant activities have been properly conducted in a safe manner. The reviews and audits serve also to provide a cohesive program that provides senior level utility management with assessments of facility operation and recommends actions to improve nuclear safety and reliability. As such, the review and audit program does not include any elements that are delineated in the Final Policy Statement criteria, as discussed above, for determining which limiting conditions are required to be included in the TS. As documented in the Final Policy Statement, the review and audit functions constitute requirements that can be relocated to the Quality Assurance plan and controlled by the applicable regulatory requirement. The security and emergency plans' review and audit functions are proposed to be relocated to their respective plans in accordance with Generic Letter (GL) 93-07. The emergency and security plans implement the Commission's regulations discussed below for these review and audit functions. Such an approach would result in an equivalent level of regulatory authority while providing for a more appropriate change control process. The licensee had proposed a 25% extension to the biennial audit frequency to provide flexibility in scheduling audits. The staff informed the licensee that the requested 25% extension was unacceptable as it did not meet ANSI 18.7-1976. By letter dated December 6, 1995, the licensee withdrew the request for the 25% extension.

Audit requirements are specified in the QA program to satisfy 10 CFR Part 50, Appendix B, Criterion XVIII. The licensee has committed to or relies upon the guidance in ANSI N18.7 and ANSI N45.2 to meet the requirements of Appendix B to 10 CFR Part 50. Audits are also governed by 10 CFR 50.54(t), 10 CFR 50.54(p), and 10 CFR Part 73. Therefore, duplication of these requirements

does not enhance the level of plant safety. Control of changes to the QA program description are governed by the provisions of 10 CFR 50.54(a). The licensee proposed to delete the audit frequency from TS 6.5.2.4.3.a. through d., and h. through j.

The licensee will continue to implement a QA program in accordance with the requirements of 10 CFR Part 50, Appendix B, and commitments to ANSI N18.7, which provides appropriate controls for the approval of changes to the audit functions and frequencies. Changes to the QA program, including departures from the referenced ANSI standards, that constitute a reduction in commitment, can be made in the future pursuant to 10 CFR 50.54(a). The staff concludes that this regulatory requirement provides sufficient control for the audit functions and frequencies, so that removing these requirements from the TS is acceptable.

In TS 6.5.1.6, 6.5.2.4.3.e. and f., and 6.8.2 the licensee proposes to relocate the requirements to establish, implement, and maintain procedures related to the Emergency Plan and Security Plan, including related requirements for periodic reviews of these programs and implementing procedures, as recommended in Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans," dated December 28, 1993. The Security Plan requirements specified in 10 CFR 50.54, 73.40, 73.55, and 73.56, and the Emergency Plan requirements specified in 10 CFR 50.54(q) and 10 CFR Part 50, Appendix E, Section V, provide adequate regulatory controls for these programs. Duplication of the requirements contained in the regulations would not enhance the level of safety for the facility. On this basis, the staff has concluded that the existing TS requirements can be relocated to the respective plans, and removed from the TS. Future changes in these requirements must be made in accordance with 10 CFR 50.54(p) for the Security Plan and 10 CFR 50.54(q) for the Emergency Plan.

On this basis, the staff concludes that these provisions are not required to be in the TS under 10 CFR 50.36 or §182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. In addition, the staff finds that sufficient regulatory controls exist under 10 CFR 50.54 to adequately control future modifications to these provisions. Accordingly, the staff has concluded that these requirements may be relocated from the TS to the respective licensee-controlled documents.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State official was notified of the proposed issuance of the amendments. The State official, in a letter dated June 27, 1994, objected to the April 13, 1994, proposed change because the State believed that the licensee was requesting a frequency of two years for all audits, except audits of the security and emergency plans. The NRC agreed that the licensee's proposal was misleading and asked that the licensee clarify its proposal. By letter dated December 6, 1995, the

licensee clearly stated that it was proposing an audit frequency based on performance. The State, by telephone call on January 5, 1996, told the NRC that it was satisfied with the licensee's clarification letter. The December 6, 1995, clarification formed part of the basis for the staff's acceptance of the licensee's proposal.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change WP, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

6.0 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

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