

July 10, 1996

CORRECTED COPY

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 NO. 2 (TAC NO. 95332)

Dear Mr. Eliason:

The Commission has issued the enclosed Amendment No. 165 to Facility Operating License No. DPR-75 for the Salem Nuclear Generating Station, Unit No. 2. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated May 7, 1996, as supplemented June 14, 1996.

This amendment involves a one-time change to TS 3/4.7.6, "Control Room Emergency Air Conditioning System," which would permit refueling of Unit 2 with the Control Room Emergency Air Conditioning System (CREACS) inoperable in Modes 5 and 6. This change will expire after the completion of the Control Room and CREACS upgrade, which is currently in progress, and the restart and entry into Mode 4 of Unit 2 from the current outage.

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

Sincerely,

Original signed by:

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

Docket No. 50-311

Enclosures: 1. Amendment No. 165 to
License No. DPR-75
2. Safety Evaluation

cc w/encls: See next page

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

July 10, 1996

Mr. Leon R. Eliason
Chief Nuclear Officer & President-
Nuclear Business Unit
Public Service Electric & Gas
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Sincerely,

A handwritten signature in dark ink, appearing to read "L. N. Olshan", is written over a circular stamp or seal.

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

Docket No. 50-311

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License No. DPR-75
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cc w/encs: 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. 50-311

SALEM NUCLEAR GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 165
License No. DPR-75

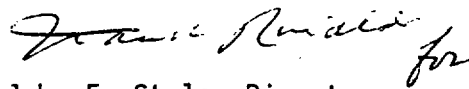
1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Public Service Electric & Gas Company, Philadelphia Electric Company, Delmarva Power and Light Company and Atlantic City Electric Company (the licensees) dated May 7, 1996, as supplemented June 14, 1996, 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. 165, 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 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script, appearing to read "John F. Stolz", followed by a small "for" written below it.

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: July 10, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 165

FACILITY OPERATING LICENSE NO. DPR-75

DOCKET NO. 50-311

Revise Appendix A as follows:

Remove Pages

3/4 7-15

3/4 7-16

Insert Pages

3/4 7-15

3/4 7-16

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM EMERGENCY AIR CONDITIONING SYSTEM

LIMITING CONDITION FOR OPERATION

=====

3.7.6 The control room emergency air conditioning system shall be OPERABLE with:

- a. Two fans,
- b. One cooling coil,
- c. One charcoal adsorber and HEPA filter train, and
- d. At least two isolation dampers in each outside air intake duct.

APPLICABILITY: ALL MODES #

ACTION:

MODES 1, 2, 3, and 4

- a. With one fan inoperable, restore the inoperable fan to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the cooling coil inoperable, restore the cooling coil to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With the filter train inoperable, restore the filter train to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With only one isolation damper in an outside air intake duct OPERABLE, close the affected duct within 4 hours by use of at least one isolation damper secured in the closed position or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6 #

- a. With less than the full complement of control room emergency air conditioning system components OPERABLE, restore the inoperable components to OPERABLE within the time intervals allowed by the ACTION statement for MODES 1, 2, 3, and 4 or initiate and maintain operation of the control room emergency air conditioning system in the recirculation mode.
- b. With both fans, the cooling coil or the filter train inoperable or with less than two OPERABLE isolation dampers in each outside air intake duct, suspend all operations involving CORE ALTERATIONS or positive reactivity changes.
- c. The provisions of Specification 3.0.3 are not applicable in MODE 6.

MODES 5 and 6 are excluded from the specification's applicability until entry into MODE 4 following startup from the current 1996 extended outage. The specification's applicability will return to ALL MODES following entry into MODE 4.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

=====

4.7.6.1 The control room emergency air conditioning system shall be demonstrated OPERABLE:

- a. At least once per 31 days by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least one hour and maintains the control room air temperature less than or equal to 120°F with each fan operating for at least 15 minutes.
- b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system, by:
 1. Verifying that the charcoal adsorbers remove $\geq 99\%$ of a halogenated hydrocarbon refrigerant test gas and that the HEPA filter banks remove $\geq 99\%$ of the DOP when they are tested in-place using the test procedure guidance of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978 (except for the provisions of ANSI N510 Sections 8 and 9), and the system flow rate is 7410 cfm $\pm 10\%$.
 2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
 3. Verifying a system flow rate of 7410 cfm $\pm 10\%$ during system operation.
- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 165 TO FACILITY OPERATING LICENSE NO. DPR-75

PUBLIC SERVICE ELECTRIC & GAS COMPANY

PHILADELPHIA ELECTRIC COMPANY

DELMARVA POWER AND LIGHT COMPANY

ATLANTIC CITY ELECTRIC COMPANY

SALEM NUCLEAR GENERATING STATION, UNIT NO. 2

DOCKET NO. 50-311

1.0 INTRODUCTION

By letter dated May 7, 1996, as supplemented June 14, 1996, the Public Service Electric & Gas Company (the licensee) submitted a request for changes to the Salem Nuclear Generating Station, Unit No. 2, Technical Specifications (TS). The request would make a one-time change to TS 3/4.7.6, "Control Room Emergency Air Conditioning System," which would permit refueling of Unit 2 with the Control Room Emergency Air Conditioning System (CREACS) inoperable in Modes 5 and 6. This change will expire after the completion of the Control Room and CREACS upgrade, currently in progress, and the restart and entry into Mode 4 of Unit 2 from the current outage. The June 14, 1996, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination or the Federal Register notice.

2.0 BACKGROUND

The control area air conditioning system (CAACS) is designed to maintain control room temperatures within the limits required for operation, maintenance, and testing of plant controls, and to provide uninterrupted safe occupancy during post-accident conditions. A portion of the CAACS, designated the CREACS, supplies cooled, filtered air to the control rooms for both units. The CREACS is a safety-related system that maintains the habitability of the control room in the event of an accident and is isolated during normal operation.

The CREACS was originally designed with two separate trains, each serving one plant unit control room. The Unit 1 CREACS serves the control room and adjacent offices for Unit 1 and the corridor between the Unit 1 and Unit 2 control room. The Unit 2 CREACS serves the control room for Unit 2 only. Each train consists of a filter enclosure equipped with low efficiency, high-

efficiency particulate air (HEPA) and charcoal filters, a cooling coil, two vane-axial fans (one standby), supply and return ducts to the control room, and dampers.

In 1991, the licensee evaluated the leaktight integrity of the wall which separates the two control rooms and determined that the two control rooms should be redesigned into a combined control room with a common envelope. The control room envelope (CRE) that combines both control room areas would be supplied by both CREACS trains. Therefore, the licensee proposed to combine the Unit 1 and Unit 2 control rooms into a common CRE and modify the CREACS design to provide the capability to serve a CRE that includes both the control rooms. During the CREACS modification, the CAACS from either unit is available and functional to maintain the CRE temperature and habitability.

3.0 EVALUATION

The current TS 3/4.7.6 for Modes 5 and 6 requires that:

- With less than the full complement of CREACS components operable, restore the inoperable components to operable or initiate and maintain operation of the CREACS in the recirculation mode.
- With both fans, the cooling coil, or the filter train inoperable, or with less than two operable isolation dampers in each outside air intake duct, suspend all operations involving core alterations or positive reactivity changes.

The licensee proposes to add a note in TS 3/4.7.6 to state that:

- Modes 5 and 6 are excluded from the specification's applicability until entry into Mode 4 following startup from the current 1996 extended outage. The specification's applicability will return to all modes following entry into Mode 4. To make room for this note on page 3/4 7-15, some of the information on this page was relocated to the next page, 3/4 7-16.

The control room temperature is normally maintained at 76 °F with 50% relative humidity. The acceptable upper temperature limit for the CRE is 85 °F which is required to protect instrument accuracy. The equipment in the CRE has been designed to withstand a temperature of 110 °F without loss of safety function. The CAACS was designed to maintain CRE ambient temperatures within the comfort level for control room personnel during normal operation. With the CREACS inoperable in Modes 5 and 6, the licensee proposed to use the CAACS to control ambient air temperature and maintain habitability of the CRE during normal and accident conditions.

The licensee has evaluated the functional capability of the CAACS to ensure its operation during Modes 5 and 6 with the CREACS under modification. The licensee stated that the temperature level in the control room will be monitored constantly to ensure that the CRE temperature stays under the

acceptable limit of 85 °F. Should the temperature in the CRE exceed 85 °F, administrative controls will be in place to restore the temperature to within acceptable levels and to prevent any core alteration activities or positive reactivity changes until the acceptable temperature level is restored.

Normally, following an accident, the CAACS will shift to the CREACS in a recirculation mode to protect control room operators from airborne radiation, toxic fumes, hazardous chemicals, and smoke from external fires while the outside air supply is shut off. The CAACS will operate in a recirculation mode for areas outside the CRE. The postulated events for Salem 2 during Modes 5 and 6 are fuel handling accidents, waste gas releases, liquid waste releases, and loss of off-site power. The licensee has justified the one-time TS changes by evaluating these events.

The proposed one-time change necessitated a reassessment of the radiological consequences of postulated fuel handling accidents (FHAs) at Salem Units 1 and 2 while the CREACSs for both units are out of service during the ongoing system upgrade. Fuel movement inside the fuel handling building (FHB) is restricted in accordance with plant TSs unless FHB ventilation is operable. However, the licensee's calculations performed as part of the engineering evaluation for an FHA assumed that no credit was taken for the iodine removal by filtration. No credit was taken for prompt radiation detection and isolation of containment building penetrations as required by the TSs. The fuel to be reloaded into the Salem Unit 2 core has decayed for approximately 10 months. The licensee assumed that the fuel to be reloaded has decayed for 6 months. The licensee's doses are well within General Design Criterion (GDC) 19.

The staff has completed its evaluation of the potential radiological consequences of an FHA at Salem Unit 2 based upon the conditions of the proposed TS changes. In addition to reviewing the licensee's submittal, the staff performed an independent analysis to determine plant conformance with the requirements of 10 CFR Part 100 and GDC 19 of Appendix A to 10 CFR Part 50. In its analysis, the staff utilized the assumptions contained in Regulatory Guide 1.25, and the review procedures specified in Standard Review Plan (SRP) Section 15.7.4. The staff assumed an instantaneous puff release of noble gases and radioiodine from the gap and plenum of the broken fuel rods. These gas bubbles will pass through at least 23 feet of water covering the fuel before reaching the containment atmosphere. All airborne activity reaching the containment atmosphere is assumed to exhaust to the environment within 2 hours. As stipulated in the proposed TSs the gap activity is assumed to have decayed for a period of 6 months (4380 hours). The staff computed the offsite doses for Salem 2 using the assumptions described above and NRC's ACTICODE computer code. The resulting calculated values and assumptions are in Tables 1 and 2.

Other accident scenarios that were evaluated are the waste gas releases and liquid waste releases. Calculations indicated that CREACS is not needed to provide protection against postulated waste gas decay tank or volume control tank ruptures. The liquid waste, particularly with the decay period since

plant operation, will not cause an airborne radiation problem of sufficient magnitude to threaten control room envelope habitability.

Table 1*

Control Room (rem)	Licensee	Staff
thyroid dose	7.52 E-5	3.6 E-4
whole body gamma dose	1.86 E-3	4.6 E-4

* The calculations indicate the doses are negligible compared to GDC 19 limits (30 rem and 5 rem respectively)

The licensee evaluated the system in the event of a loss of offsite power (LOOP). The CAACS is powered from Class 1E vital buses and its functional capability will not be interrupted because of LOOP.

The licensee evaluated the system in the event of a potential uncontrolled boron dilution during refueling operations and indicated that the CRE habitability will not be impacted as a result of an uncontrolled boron dilution event.

The licensee evaluated the system in the event of a loss of spent fuel pool cooling based on the amount of time the present spent fuel has decayed. The TSs require that the maximum temperature of the pool should not exceed 182 °F when a complete loss of forced cooling occurs. The existing procedures for operator actions under these conditions include:

- provide up to 15 gpm of make-up water and
- operating at least one FHB exhaust fan.

Both of these operator actions can be accomplished from outside of the control room if necessary. The licensee stated that if both FHB fans are lost, the pool temperatures will increase gradually for approximately two days before ventilation is needed to remove moisture from the FHB atmosphere. This would allow sufficient time to restore ventilation to the pool area.

The licensee evaluated the system in the event of a fire inside the control room. The licensee stated that the CRE would be purged by the CAACS during a fire. Should a fire occur, existing evacuation plans and procedures will be followed to ensure that the plant maintains a safe shutdown condition via local operation of equipment. If an external fire is detected, operator action will be taken to isolate the CRE from outside air and the CAACS would remain available. In case the CRE would become uninhabitable due to smoke in the atmosphere, evacuation procedures would be followed as in the case of the internal fire.

TABLE 2

ASSUMPTIONS USED FOR CALCULATING RADIOLOGICAL CONSEQUENCES

<u>Parameters</u>	<u>Quantity</u>
Power Level (Mwt)	3570
Number of Fuel Rods Damaged	204
Total Number of Fuel Rods	29,372
Shutdown time, hours	4320
Power Peaking Factor*	1.65
Fission Product Release Duration	2 hours
Release Fractions*	
Iodine	12%
Noble Gases	10%
Krypton Gas	30%
Iodine Forms*	
Elemental	75%
Organic	25%
Core Fission Product Inventories per TID-14844	
<u>Receptor Point Variables</u>	
<u>Control Room</u>	
Atmospheric Relative Concentration, X/Q (sec/m ³)	4.4×10^{-3}
Control Room Volume, cubic feet	4.1×10^5
*Regulatory Guide 1.25	

The licensee evaluated the system in the event of loss of decay heat removal by implementing procedural and hardware enhancements to address NRC Generic Letter 88-17. Generic Letter 88-17 requires all licensees to, among other things, evaluate the event involving loss of decay heat removal during nonpower operation and provide compensatory measures to enhance the level of protection. The licensee stated that the fuel has decayed to such low levels in more than 6 months that doses associated with the fuel handling accident are well below the limits of GDC 19. The control room has adequate monitoring capability and procedural guidance to identify and respond to a loss of the residual heat removal system. Also, the CREACS is not required in Modes 5 or 6 to mitigate the consequences of such an accident.

The licensee also evaluated the impact on Salem 2 as a result of a postulated LOCA, fuel handling accident, or gaseous radwaste releases at the Hope Creek plant, which is on the same site as the Salem plant. The analyses indicated that doses to Salem control room personnel will not exceed GDC 19 limits. The licensee stated that the Salem plant will either isolate its CAACS outside air intakes or maintain the capability of being isolated in the event of a Hope Creek LOCA.

The licensee evaluated the impact on CRE habitability from the storage of hazardous chemicals at both Salem and Hope Creek sites. The one possible event which might impact the CRE would be the rupture of an ammonium hydroxide tanker. The licensee stated that no ammonium hydroxide tanker deliveries will be allowed during the CREACS modification.

The licensee also evaluated the toxic accumulation of other hazardous chemicals with respect to chemical dispersion, high toxicity threshold, or container size. The evaluation includes the nitrogen tube trailers and replacement refrigerant for the Hope Creek chillers. The analyses indicated that the accumulation of toxic levels for these chemicals in the CRE would not exceed Regulatory Guide 1.78 limits.

4.0 SUMMARY

The staff has reviewed the licensee's submittal for a one-time TS change to permit refueling of Salem 2 with the CREACS inoperable in Modes 5 and 6. The licensee has justified the use of CAACS to maintain control room envelope ambient temperature and habitability during accident conditions. The licensee also performed safety analyses and evaluations for postulated events during the refueling period. Based on this review, the staff concludes that the proposed one-time TS change is acceptable on the basis that:

- the proposed changes are justified by the licensee with technical bases that have been reviewed by the staff.
- the licensee has evaluated the functional capability and availability of the CAACS to maintain the current control room ambient temperature and habitability while the CREACS is inoperable.

- the licensee's analysis and the staff's independent analysis of the fuel handling accident have indicated that the calculated radiation doses at the CAACS intakes are within the GDC 19 limits.
- The licensee has evaluated other postulated events and indicated that their impact on the plant safety is either under control or insignificant.

Based on the above, the staff has approved the proposed one-time change to TS 3.7.6 for Salem 2. This approval is intended to be in effect until restart of the plant before entering Mode 4.

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. By letter dated June 10, 1996, the State official provided several comments. The State official had subsequent discussions with the licensee regarding these comments. By telephone call on June 28, 1996, the State official told the NRC that his comments had been resolved.

6.0 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. 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 (61 FR 25710). 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.

7.0 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 Contributors: J. Guo
J. Minns

Date: July 10, 1996