November 4, 1991

Docket No. 50-354

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

Dear Mr. Miltenberger:

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SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT REGARDING CATHODIC PROTECTION SYSTEM AMENDMENT, HOPE CREEK GENERATING STATION (TAC NO. 81821)

The Commission has issued the enclosed Environmental Assessment for the Hope Creek Generating Station. This Environmental Assessment was written in response to your license amendment application dated October 10, 1991.

This amendment application requests that the surveillance requirements associated with the buried fuel oil transfer piping's cathodic protection system be separated from those used to determine diesel generator operability.

We have enclosed a copy of the Environmental Assessment and Finding of No Significant Impact for this proposed amendment which is being forwarded to the Office of the Federal Register for publication.

Sincerely,

/S/

Stephen Dembek, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Environmental Assessment

cc w/enclosure:
See next page

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

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UNITED STATES NUCLEAR REGULATORY COMMISSION

PUBLIC SERVICE ELECTRIC AND GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. NPF-57, issued to Public Service Electric and Gas Company and the Atlantic City Electric Company (the licensees) for operation of the Hope Creek Generating Station, located at the licensees' site in Salem County, New Jersey.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action:

The proposed amendment would separate the surveillance requirements (Surveillance 4.8.1.1.2.g) associated with the buried fuel oil transfer piping's cathodic protection system from those used to determine diesel generator operability.

The proposed action is in accordance with the licensees' application for amendment dated October 10, 1991.

The Need for the Proposed Action:

Technical Specification (TS) 4.8.1.1.2 delineates surveillance requirements that are to be performed to demonstrate operability of the Diesel Generators. TS 4.8.1.1.2.g delineates the surveillance requirements necessary to verify that the impressed current cathodic protection system for the buried portion of the fuel oil transfer piping is operable. Since this surveillance requirement is currently a sub-item of TS 4.8.1.1.2, literal interpretation of

the TS could preclude maintenance on the cathodic protection system (if that maintenance requires that the system be made inoperable) and/or potentially result in a station shutdown due to failure of the cathodic protection system causing all of the Diesel Generators to be declared inoperable.

Environmental Impacts of the Proposed Action:

The cathodic protection system was installed by the licensees to protect the buried fuel oil transfer piping from external corrosion. Installation and testing of this system is required by Regulatory Guide 1.137 (Revision 1, October 1979). The licensees have proposed removing the cathodic protection system surveillance requirements from TS 4.8.1.1.2 and creating a separate TS (TS 4.8.1.1.4) to verify the operability of the cathodic protection system. Additionally, the licensees proposed to create a new action statement (TS 3.8.1.1.h) to delineate the actions necessary if the cathodic protection system is inoperable for more than thirty days.

The buried portion of the fuel oil transfer piping is provided to allow for convenient loading of diesel fuel at a truck/barge fill connection outside the restricted area. The buried portion of the transfer piping is not safety-related (as stated in UFSAR Section 9.5.4) since an emergency fill connection is provided inside the diesel building, which can be isolated from the buried portion of the fill piping by an isolation valve located inside the diesel building. This emergency fill connection provides a protected fill path to the Diesel Generator Fuel oil storage tanks. This amendment would not eliminate the requirement to have the cathodic protection system installed and the licensees will still fully comply with Regulatory Guide 1.137. This amendment would separate the surveillance requirements of the cathodic

protection system from those surveillances directly related to Diesel Generator operability. This amendment would also allow the cathodic protection system to be inoperable for thirty days. This would allow the licensees a reasonable time period to restore the system to operation if maintenance is necessary on the system. The buried fuel oil transfer system is not used to mitigate the consequences of any previously analyzed accident. Therefore, the proposed amendment would not significantly increase the probability or consequences of any accidents previously analyzed. No significant changes in the types or amounts of radiological effluents, during normal operation or postulated accidents, that may be released offsite are incurred by this proposed amendment. As a result, no significant increase in the individual or cumulative occupational radiation exposure is noted.

Therefore, because the proposed changes do not increase the probability or consequences of accidents, no changes are being made in the types or amounts of any radiological effluents that may be released offsite and there is no significant increase in the allowable individual or cumulative occupational radiation exposure, the Commission concludes that this proposed action would result in no significant radiological environmental impact.

With regard to potential nonradiological impacts, the proposed change to the TS would allow the licensees to disconnect the cathodic protection system for a thirty day period. If the cathodic protection system is inoperable for greater than thirty days the licensees must submit a special report to the NRC outlining the cause of the malfunction and the licensees' plans for restoring the system. Since the cathodic protection system is designed to limit external corrosion to the buried piping over long periods of time, a thirty day period without the cathodic protection system operating will not result in

any appreciable corrosive degradation of the buried piping. In addition to the cathodic protection system the piping has a protective coating to limit external corrosion.

Therefore, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed amendments.

Alternative to the Proposed Action:

Since the Commission concluded that there are no significant environmental effects that would result from the proposed action, any alternatives with equal or greater environmental impacts need not be evaluated.

The principal alternative would be to deny the requested amendment. This would not reduce environmental impacts of plant operation and would result in reduced operational flexibility.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the "Final Environmental Statement Related to the Operation of Hope Creek Generating Station," dated December 1984.

Agencies and Persons Consulted:

The NRC staff reviewed the licensees' request and did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT:

The Commission has determined not to prepare an environmental impact statement for the proposed license amendment.

Based on the foregoing environmental assessment, we conclude that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this action, see the application for amendment dated October 10, 1991, which is available for public inspection at the Commission's Public Document Room, 2120 L Street, N.W., Washington, DC 20555 and at the Pennsville Public Library, 190 S. Broadway, Pennsville, New Jersey 08070.

Dated at Rockville, Maryland, this 4th day of November 1991.

FOR THE NUCLEAR REGULATORY COMMISSION

Charles L. Miller

Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - I/II
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