March 21, 1997

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: HOPE CREEK GENERATING STATION (TAC NO. M94450)

Dear Mr. Eliason:

The Commission has issued the enclosed Amendment No. 97 to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated January 11, 1996, and supplemented by letters dated February 26, May 22, June 27, July 12, December 23, 1996, and March 17, 1997.

This amendment revises Section 6.0 (Administrative Controls) of the Hope Creek TSs to: 1) relocate the requirements of Section 6.5 (Station Operations Review Committee, Nuclear Safety Review and Audit, and Technical Review and Control) to the Quality Assurance Program; the licensee has agreed to incorporate the authorization to relocate these requirements in a new Appendix to the Facility Operating License, 2) replace specific management titles with generic management functional positions, 3) change Operating Engineer to Assistant Operations Manager, 4) require a Senior Reactor Operator license be held by either the Operations Manager or one of the Assistant Operations Managers, and 5) correct some typographical errors in Section 6.0.

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/
David H. Jaffe, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosures: 1. Amendment No. 97 to License No. NPF-57
2. Safety Evaluation

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DATE	3/17/97	3/17/97	07/29/96	01/24/97	03/13/97	03/19/97

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PDR ADOCK 05000354
P PDR

DOCUMENT NAME: HCM94450.AMD

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

March 21, 1997

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Docket No. 50-354

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2. Safety Evaluation

cc w/encls: See next page

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

Hope Creek Generating Station

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

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-354

HOPE CREEK GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 97
License No. NPF-57

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 (PSE&G) dated January 11, 1996, as supplemented by letters dated February 26, May 22, June 27, July 12, December 23, 1996, and March 17, 1997, 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. NPF-57 is hereby amended to read as follows:

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(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 97 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into the license. PSE&G shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

In addition, the license is amended to add paragraph 2.C.(14) to the Facility Operating license No. NPF-57 as follows:

(14) Additional Conditions

The Additional Conditions contained in Appendix C, as revised through Amendment No. 97 , are hereby incorporated into this license. Public Service Electric and Gas Company shall operate the facility in accordance with the Additional Conditions.

3. This license amendment is effective as of its date of issuance and the change to the facility shall be implemented within 60 days from the date of issuance. Implementation of this amendment shall include the relocation of certain technical specification requirements to the appropriate licensee-controlled documents as described in the Licensee's application dated January 11, 1996, and its supplements dated February 26, May 22, June 27, July 12, December 23, 1996, and March 17, 1997, and evaluated in the staff's safety evaluation attached to this amendment.

FOR THE NUCLEAR REGULATORY COMMISSION

John F. Stolz

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

Attachments: 1. Pages 6 to License* No. NPF-57 and page 1 to Appendix C of License* No. NPF-57
2. Changes to the Technical Specifications

Date of Issuance: March 21, 1997

* Page 6 of the license and page 1 of Appendix C are attached, for convenience, for the composite license to reflect this change.

ATTACHMENT TO LICENSE AMENDMENT NO. 97

FACILITY OPERATING LICENSE NO. NPF-57

DOCKET NO. 50-354

1. Revise License as follows:

Remove Page	Insert Page
6	6

2. Insert Appendix C, Page 1

3. Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

Remove	Insert
xxiv	xxiv
xxv	xxv
xxvi	-
6-1	6-1
6-2	6-2
6-6	6-6
6-7	6-7 through 6-12
6-8	-
6-9	-
6-10	-
6-11	-
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(13) Safety Parameter Display System (Section 18.2, SSER No. 5)

Prior to the earlier of 90 days after restart from the first refueling outage or July 12, 1988, PSE&G shall add the following parameters to the SPDS and have them operational:

a. Primary containment radiation
b. Primary containment isolation status
c. Combustible gas concentration in primary containment
d. Source range neutron flux

(14) Additional Conditions

The Additional Conditions contained in Appendix C, as revised through Amendment No. 97 , are hereby incorporated into this license. Public Service Electric and Gas Company shall operate the facility in accordance with the Additional Conditions.

D. The facility requires exemptions from certain requirements of 10 CFR Part 50 and 10 CFR Part 70. An exemption from the criticality alarm requirements of 10 CFR 70.24 was granted in Special Nuclear Material License No. 1953, dated August 21, 1985. This exemption is described in Section 9.1 of Supplement No. 5 to the SER. This previously granted exemption is continued in this operating license. An exemption from certain requirements of Appendix A to 10 CFR Part 50, is described in Supplement No. 5 to the SER. This exemption is a schedular exemption to the requirements of General Design Criterion 64, permitting delaying functionality of the Turbine Building Circulating Water System-Radiation Monitoring System until 5 percent power for local indication, and until 120 days after fuel load for control room indication (Appendix R of SSER 5). Exemptions from certain requirements of Appendix J to 10 CFR Part 50, are described in Supplement No. 5 to the SER. These include (a) an exemption from the requirement of Paragraph III.D.2(b)(ii) of Appendix J, exempting overall containment air lock leakage testing unless maintenance has been performed on the air lock that could affect air lock sealing capability (Section 6.2.6 of SSER 5); (b) an exemption from the requirement of Paragraph III.C.2(b) of Appendix J, exempting main steam isolation valve leak-rate testing at 1.10 Pa (Section 6.2.6 of SSER 5); (c) an exemption from Paragraph III.D.3 of Appendix J, exempting Type C testing on traversing incore probe system shear valves (Section 6.2.6 of SSER 5); (d) an exemption from Paragraph III.D.2(a) of Appendix J, exempting Type C testing for instrument lines and lines containing excess flow check valves (Section 6.2.6 of SSER 5); and (e) an exemption from Paragraph III.C.2(a) of Appendix J, exempting Type C testing of thermal relief valves (Section 6.2.6 of SSER 5). These exemptions are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. These exemptions are hereby granted. The special circumstances regarding each exemption are identified in the referenced section of the safety evaluation report and the supplements thereto. These exemptions are granted pursuant to 10 CFR 50.12. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

APPENDIX C

ADDITIONAL CONDITIONS
OPERATING LICENSE NO. NPF-57

Public Service Electric and Gas Company and Atlantic City Electric Company shall comply with the following conditions on the schedules noted below:

Amendment Number	Additional Condition	Implementation Date
97	The licensee is authorized to relocate certain Technical Specification requirements to licensee-controlled documents. Implementation of this amendment shall include the relocation of these technical specification requirements to the appropriate documents, as described in the licensee's application dated January 11, 1996, as supplemented by letters dated February 26, May 22, June 27, July 12, December 23, 1996, and March 17, 1997, and evaluated in the staff's safety evaluation attached to this amendment.	The amendment shall be implemented within 60 days from March 21, 1997

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6.1 RESPONSIBILITY

6.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Senior Nuclear Shift Supervisor, or during his absence from the control room, a designated individual shall be responsible for the control room command function. A management directive to this effect, signed by the senior corporate nuclear officer shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through-intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Hope Creek Generating Station Updated Final Safety Analysis Report and updated in accordance with 10 CFR 50.71(e).

b. The plant manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The senior corporate nuclear officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

<u>UNIT STAFF</u>

6.2.2 The unit organization shall be subject to the following:

a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;

UNIT STAFF (Continued)

b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2 or 3, at least one licensed Senior Reactor Operator shall be in the control room;

c. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation; and

d. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions e.g., licensed Senior Reactor Operators, licensed Reactor Operators, radiation protection technicians, equipment operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal** 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance on major unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.

2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time.

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the appropriate department manager, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the plant manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

**The shift schedule is based upon a 12-hour shift with a work week of either 36 hours or 48 hours.

6.2.3 SHIFT TECHNICAL ADVISOR

6.2.3.1 The Shift Technical Advisor shall provide advisory technical support to the Senior Nuclear Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 for comparable positions, except for the individual designated as the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, the individual designated as the operations manager who shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 except as modified by Specification 6.3.3, and the licensed operators who shall comply with the requirements of 10 CFR Part 55.

6.3.2 The Operations Manager or Assistant Operations Manager shall hold a senior reactor operator license. The Senior Nuclear Shift Supervisors, and Nuclear Shift Supervisors, shall hold a senior reactor operator license. The Nuclear Control Operators shall hold a reactor operator license.

6.3.3 The Operations Manager shall meet one of the following:

(1) Hold a senior reactor operator license, or

(2) Have held a senior reactor operator license for this or a similar unit (BWR), or

(3) Have been certified at an appropriate simulator for equivalent senior operator knowledge.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall: 1) be maintained under the direction of the Director - Nuclear Training, 2) shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI/ANS 3.1-1981 for all affected positions except licensed operators, and 3) comply with the requirements of 10 CFR Part 55 for licensed operators.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Fire Protection Manager and shall meet or exceed the requirements of the SRP (NUREG-0800) Section 13.2.2.II.6, 10 CFR 50 Appendix R and Branch Technical Position CMEB 9.5.1, Section C.3.d.

6.5 REVIEW AND AUDIT (THIS SECTION DELETED)

(PAGES 6-7 THROUGH 6-12 ARE DELETED)

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6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified pursuant to the requirements of Section 50.72 to 10 CFR Part 50 and a report submittal pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the Station Operations Review Comittee (SORC), and the results of this review shall be submitted to the Nuclear Review Board and the senior corporate nuclear officer.

6.7. SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The senior corporate nuclear officer and the senior management position with responsibility for independent nuclear safety assessment activities and quality program oversight shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the SORC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon unit components, systems, or structures, and (3) corrective action taken to prevent recurrence.

c. The Safety Limit Violation Report shall be submitted to the Commission, the senior management position with responsibility for independent nuclear safety assessment activities and quality program oversight and the senior corporate nuclear officer within 30 days of the violation.

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

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. The applicable procedures required to implement the requirements of NUREG-0737 and supplements thereto.

c. Refueling operations.

d. Surveillance and test activities of safety-related equipment.

e. Security Plan implementation.

f. Emergency Plan implementation.

g. Fire Protection Program implementation.

h. PROCESS CONTROL PROGRAM implementation.

i. OFFSITE DOSE CALCULATION MANUAL implementation.

j. Quality Assurance Program for effluent and environment monitoring.

6.8.2 Each procedure and administrative policy of 6.8.1 above, except 6.8.1.e and 6.8.1.f, and changes thereto, shall be reviewed and approved in accordance with requirements in Updated Final Safety Analysis Report (UFSAR) section 17.2 for SORC or for Technical Review and Control, as appropriate, prior to implementation and reviewed periodically as set forth in administrative procedures. Procedures of 6.8.1.e and 6.8.1.f shall be reviewed and approved in accordance with the Facility's Security and Emergency Plans or requirements in Updated Final Safety Analysis Report (UFSAR) section 17.2 for Technical Review and Control, as appropriate, prior to implementation and reviewed periodically as set forth in administrative procedures.

6.8.3 On-the-Spot changes to procedures of Specification 6.8.1 may be made provided:

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

b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Reactor Operator license on the unit affected; and

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

PROCEDURES AND PROGRAMS (Continued)

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the HPCI, CS, RHR, RCIC, Containment Hydrogen Recombiner, H2/02 analyzer, Post-Accident Sampling, Control Rod Drive Hydraulic (Scram Discharge portion) systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and

2. A service pressure leak test for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions.

The program shall include the following:

1. Training of personnel,

2. Procedures for sampling and analysis, and

3. Provisions for maintenance of sampling and analysis equipment.

RECORD RETENTION (Continued)

h. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.

c. Records of radiation exposure for all individuals entering radiation control areas.

d. Records of gaseous and liquid radioactive material released to the environs.

e. Records of transient or operational cycles for those unit components identified in Table 5.7.1-1.

f. Records of reactor tests and experiments.

g. Records of training and qualification for current members of the unit staff.

h. Records of inservice inspections performed pursuant to these Technical Specifications.

i. Records of quality assurance activities required by the Quality Assurance Program.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.

k. Records of SORC meetings and activities of the Nuclear Review Board (and activities of its predecessor, the Offsite Safety Review (OSR) staff).

l. Records of the snubber service life monitoring pursuant to Technical Specification 4.7.5.

m. Records of analyses required by the radiological environmental monitoring program which would permit evaluation of the accuracy of the analyses at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr* shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)**. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.

c. A radiation protection qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Radiation Protection Supervisor in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose greater than 1000 mrem* shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Senior Nuclear Shift Supervisor on duty and/or the radiation protection supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrem* that are located within large areas, such as the containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance direct or remote (such as use of closed circuit TV cameras), may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

---

*Measurement made at 18 inches from source of radioactivity.

**Radiation protection personnel or personnel escorted by radiation protection personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 The PCP shall be approved by the Commission prior to implementation.

6.13.2 Licensee initiated changes to the PCP:

1. Shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:

   a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information;
   b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
   c. Documentation of the fact that the change has been reviewed and found acceptable by the SORC.

2. Shall become effective upon review and acceptance by the SORC.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 The ODCM shall be approved by the Commission prior to implementation.

6.14.2 Licensee initiated changes to the ODCM:

1. Shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the change(s) was made. This submittal shall contain:

   a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the ODCM to be changed with each page numbered and provided with an approval and date box, together with appropriate analyses or evaluations justifying the change(s);
   b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determination; and
   c. Documentation of the fact that the change has been reviewed and found acceptable by the SORC.

2. Shall become effective upon review and acceptance by the SORC.

6.15 MAJOR CHANGES TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS

6.15.1 Licensee initiated major changes to the radioactive waste system (liquid, gaseous and solid):

1. Shall be reported to the Commission in the UFSAR for the period in which the evaluation was reviewed by SORC. The discussion of each change shall contain:

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 97 TO FACILITY OPERATING LICENSE NO. NPF-57

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

1.0 INTRODUCTION

By letter dated January 11, 1996, as supplemented by letters dated February 26, May 22, June 27, July 12, December 23, 1996, and March 17, 1997, the Public Service Electric & Gas Company (the licensee) submitted a request for changes to the Hope Creek Generating Station, Technical Specification (TS). The requested changes would revise Section 6.0 (Administrative Controls) of the Hope Creek TS to: 1) relocate the requirements of Section 6.5 (Station Operations Review Committee, Nuclear Safety Review and Audit, and Technical Review and Control) to the Quality Assurance Program (QAP), 2) replace specific management titles with generic management functional positions, 3) change Operating Engineer to Assistant Operations Manager, 4) require a Senior Reactor Operator license be held by either the Operations Manager or one of the Assistant Operations Managers, and 5) correct some typographical errors in Section 6.0. The supplements did not change the NRC staff's initial proposed no significant hazards consideration determination contained in the February 14, 1996 Federal Register notice (61 FR 5818). With regard to the supplements, only the supplements dated February 26, July 12, December 23, 1996, and March 17, 1997, actually address changes to the TS. The remaining supplements dated May 22 and June 27, 1996, address the related issue of changes to the QAP. In the course of reviewing the supplements to the application, the NRC staff noted that the licensee had made errors in the associated draft TS pages. These errors were corrected by the licensee with a final set of draft TS pages. In each case, the supplement correctly addressed the intended TS changes.

Relocation of the SORC and other review and audit requirements from the TS to the QAP is consistent with the processes described in Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance."

2.0 DISCUSSION AND EVALUATION

2.1 Relocation of Selected TS to the QAP (Review and audit)

2.1.1 Discussion

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Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TS to be included 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 TSs 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.

Section 50.36 provides, that with respect to limiting conditions for operations (LCO), four criteria to be used in determining whether particular safety functions are required to be included in the TSs. While the 4 criteria specifically apply to LCOs, in adopting the revision to the rule the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TS (60 FR 36957). Addressing administrative controls 10 CFR 50.36 states that they "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure safe operation of the facility in a safe manner." The specific content of the administrative controls section of the TSs is therefore that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff has determined that requirements that are not specifically required under §50.36(c)(5) and which are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety, can be removed from administrative controls. Existing TS requirements, therefore, 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. Similarly, while the required content of TS administrative controls is specified in 10 CFR 50.36(c)(5), particular details of administrative controls may be relocated to licensee-controlled documents where §50.54, §50.59, or other regulations provide adequate regulatory control.

2.1.2 Evaluation

By letter dated December 12, 1995, the staff issued NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." AL 95-06 provided information regarding recent experiences involving the relocation of TS administrative controls related to quality assurance. In AL 95-06, the staff compared the content of typical TS administrative controls related to quality assurance requirements, for those plants that have not converted to the improved Standard Technical Specifications (ISTS), with established staff positions and amendment requests. On the basis of this review, the staff provided several observations in order to assist those licensees considering amendment requests related to quality assurance requirements.

The licensee's January 11, 1996, letter as supplemented on February 26, 1996, May 22, 1996, June 27, 1996, July 12, 1996, and on December 23, 1996, to the NRC, proposes to relocate the administrative controls related to the quality assurance review and audit requirements of TS 6.5, "Review and Audit," from the Hope Creek Generating Station TSs to the QAP. This change is in accordance with the guidance contained in NRC AL 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." The quality assurance program is a logical candidate for such locations due to the controls imposed by such regulations such as Appendix B to 10 CFR Part 50, the existence of NRC-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a).

The licensee proposed that the review, investigative and audit functions and frequencies, including specific audit requirements for the fire protection program, specified in TS Sections 6.5.1 and 6.5.2 be relocated from the TSs to the appropriate sections of the QAP. The licensee has proposed to relocate these TS requirements to the QAP and control any subsequent changes in accordance with 10 CFR 50.54(a).

The licensee proposed to relocate the requirements in existing TS 6.5.1, "Stations Operations Review Committee (SORC)," to Section 17.2.1.1.2.2 of the QAP with the following changes:

1) PSE&G proposes to delete specific titles in TS 6.5.1 that describe the SORC membership by title, and replace that with a description of SORC membership that shall be chaired by the plant manager and composed of members having experience in each of the following areas: a) plant operations, b) engineering, c) maintenance, d) chemistry, e) radiation protection, and f) quality assessment. The changes from specific membership titles are administrative in nature and the relocated SORC provisions continue to provide for members with the appropriate technical expertise to be on the SORC. The staff finds this change acceptable as it conforms to the Improved Standard Technical Specifications (ISTS).

2) In relocating TS 6.5.1 to the QAP, TSs 6.5.1.6.j and 6.5.1.6.k were deleted because they were previously relocated to the Facility Security Plan and the Facility Emergency Plan, respectively, upon the issuance of Licensing Amendment No. 95. This deletion is authorized by previous NRC approval of these amendments.

3) PSE&G proposes to relocate existing TSs 6.5.1.7 provisions for using qualified reviewers to the QAP Section 17.2.1.1.2.1. PSE&G further proposes to relocate the remaining TSs 6.5.1 to QAP 17.2.1.1.2.2. The proposed QAP Section 17.2.1.1.2.1 continues to permit the use of qualified reviewers to perform reviews of procedures, programs, and changes thereto, on behalf of the SORC. Personnel performing as

qualified reviewers will continue to meet the current TS 6.5.3.2 qualification requirements of Section 4.1 and 4.7 of ANS 3.1-1981. The current TS text addressing the use of qualified reviewers is in one section of the TSs. The relocation of TS 6.5.1 to various QAP sections is administrative in nature and acceptable to the staff.

The NRC staff notes that the provisions of Section 4.1 of ANS 3.1-1981, as discussed in the sixth paragraph of the Foreword to ANS 3.1-1981, were added for the following specific reason:

"A major addition was made to 4.1 which provides guidance for the selection of those rare, exceptional individuals who have demonstrated outstanding management ability yet do not possess the formal education requirements specified in this standard. These individuals, however, have additional experience, training and education that is considered equivalent to that required to meet the qualifications of a particular position."

Based on the above discussion, the staff considers the use of Section 4.1 of ANS 3.1-1981, to be for rare, exceptional individuals that have outstanding management ability, but who do not possess the formal education requirements specified for their assigned position and should not be applied generically to non-supervisory personnel performing the qualified reviewer function.

The licensee proposed to relocate the requirements in existing TS 6.5.2, "Nuclear Safety Review and Audit," to various sections of the QAP with the following change:

1) The independent offsite review functions (TS 6.5.2.4) currently performed by the Offsite Safety Review staff (OSR) under the cognizance of the Director, Quality Assurance and Safety Review, will be performed by a Nuclear Review Board (NRB) that reports to and advises the Chief Nuclear Officer (CNO). The change provides an equivalent independence for the offsite review function and the staff considers this administrative change acceptable. Reference to "OSR" in the remaining TSs should be changed to "NRB".

2) The current TS 6.5.2.4.1 review and audit areas of nuclear engineering, metallurgy, mechanical engineering, and electrical engineering have been combined into one area that will be referred to as engineering. The licensee is committed to the requirements of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." Section 4.3.1 of ANSI N18.7 identifies the specific areas of engineering, including the mechanical, electrical, and metallurgy disciplines, that requires review by the offsite independent review personnel. The change therefore is administrative in nature and does not reduce plant safety.

3) TSs 6.5.2.2 currently requires that the OSR staff shall meet or exceed the qualifications described in Section 4.7 of ANS 3.1-1981. PSE&G proposes in Section 17.2.1.1.2.3 of the QAP to reduce the qualifications for a maximum of 2 personnel performing the offsite independent review function (the NRB) by permitting these NRB members to meet the following alternative qualification requirements:

   a) a minimum of 20 years nuclear related experience,
   b) shall hold or have held a senior reactor operator license or certification,
   c) shall have served as a minimum in a nuclear vice-president or equivalent position.

   Additionally, the Director-QA/NSR will approve and document the alternative qualifications for NRB members where exception to the ANS 3.1-1981, Section 4.7, qualification is necessary.

   ANS 3.1-1981, Section 4.7, states, in part, that members of independent review committees shall have:

   a) Education: Bachelor's Degree in Engineering or related science.
   b) Experience: Five years of professional level experience in the field of specialty.
   c) Training: As required by Section 5.3.1, "Training for Managers and Supervisors."

   The NRC staff finds that the proposed alternative experience qualification provides an equivalent level of knowledge, training, and experience for personnel performing the NRB function and the change does not reduce plant safety.

4) PSE&G proposes in Section 17.2.1.1.2.3 of the QAP to appoint NRB subcommittees for the purposes of performing reviews or studies in areas requiring particular expertise or for performing special investigations. Additionally PSE&G proposes that NRB subcommittee members meet or exceed the qualifications described in Section 4.7 of ANS 3.1-1981 and that the chair person of an NRB subcommittee be an NRB member.

   The NRC staff finds that the proposed use of NRB subcommittees acceptable based on the fact that subcommittee members meet or exceed the qualification of NRB members.

5) TS 6.5.2.4.4.b presently requires that audit reports performed by an independent consultant be forwarded by the auditing organization to the Chief Nuclear Officer and President and to management positions responsible for the area audited within 60 days after completion of the audit. FSAR Section 1.8 currently indicates a commitment to ANSI

N45.2.12, "Requirements for Auditing Quality Assurance Programs for Nuclear Power Plants," as endorsed by Regulatory Guide 1.144, "Auditing of Quality Assurance Programs for Nuclear Power Plants," Revision 1, which specifies that audit reports be forwarded by the auditing organization within 30 days after completion of the audit. PSE&G proposes to revise FSAR Section 1.8 to incorporate the current TSs provision for audits performed by an independent consultant to be forwarded within 60 days after completion of the audit by identifying this as an exception to RG 1.144.

The NRC staff finds that the proposed exception to RG 1.144 acceptable based on the fact that the current TSs permits audits performed by an independent consultant to be forwarded within 60 days after completion of the audit.

The licensee proposed to relocate the independent safety engineering function requirements in existing TS 6.5.2.5, "On Site Safety Review Group (SRG)," currently performed by the SRG to QAP Section 17.2.1.1.2.4, "On Site Independent Review," with the following changes:

1) The proposed change would eliminate the independent onsite review function as a dedicated organization and reassign the function to the Quality Assessment Department.

2) Qualification changes

   TS 6.5.2.2 qualification currently requires that the SRG staff shall meet or exceed the qualifications described in Section 4.4 of ANS 3.1-1981. PSE&G proposes in Section 17.2.1.1.2.4 of the QAP to reduce the qualifications for the review personnel performing the onsite independent review function by permitting these reviewers to meet the following alternative qualification requirements:

   The personnel performing the onsite independent review shall have:

   a) at least 3 years related experience of which at least 2 years are nuclear related, and a Bachelor's Degree in Engineering or related field, or

   b) at least 8 years related experience, of which at least 5 years are nuclear related, or

   c) for the discipline of Operations, a senior reactor operator license or certificate may be used as an alternative qualification to having a Bachelor's Degree in Engineering or related field.

> Further, QAP Section 17.2.1.1.2.4 would require that at least 50 percent of the personnel performing the onsite independent review function have a Bachelor's Degree in Engineering or a related field.
>
> The NRC staff finds that the proposed alternative experience qualification provides an equivalent level of knowledge and experience for personnel performing the onsite review function.

The licensee proposed to relocate the technical review and control for procedure related documents and non-procedure related documents in existing TS 6.5.3, "Technical Review and Control," to Section 17.2.1.1.2.1 of the QAP with the following change:

> The TS 6.5.3.4 requirement that copies of program and procedure records shall be provided to the General Manager, SORC, or the OSR staff and/or the NRC as necessary when their reviews are required has been deleted in relocating this TS section to the QAP.

Because these reviews are maintained as records and are available for review upon request, the staff finds this deletion acceptable.

The NRC staff has reviewed the changes to the relocated TS sections and determined that the incorporation of the changes into the QAP are acceptable in that the QAP continues to satisfy the applicable criteria of Appendix B to 10 CFR Part 50 and NUREG 0800 (SRP Section 17.2). Based on the considerations discussed above and the fact that any subsequent changes to the relocated TS provisions will be controlled in accordance with 10 CFR 50.54(a), the staff concludes that the revisions to the QAP, as proposed by letters dated January 11, 1996, as supplemented on February 26, 1996, May 22, 1996, June 27, 1996, and December 23, 1996, are acceptable.

Given that the requirements in the QAP implements the Commission's regulations pertaining to the review and audit functions, inclusion of these particular provisions in TSs is not necessary to assure safe operation of the facility. 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. However, the staff has determined that the review and audit functions are adequately addressed by existing regulations and the related QAP commitments. Based upon the relocation of the review and audit provisions to the QAP, it is not necessary to include redundant or additional requirements in the TS administrative controls.

The licensee will continue to implement the QAP 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 QAP are controlled in accordance with 10 CFR 50.54(a) and include requirements for prior NRC review and

approval if a change constitutes a reduction in a QAP commitment. The staff concludes that this regulatory requirement provides sufficient control for the audit and review functions, so that removing these requirements from the TSs is acceptable.

In conclusion, the above relocated requirements relating to administrative controls are not required to be in the TSs under 10 CFR Section 50.36 or Section 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 the resulting new administrative controls provides all of the requirements needed to satisfy 10 CFR 50.36(c)(5), and sufficient regulatory controls exist under 50.54(a), or other applicable regulation to assure continued protection of the public health and safety. Accordingly, the staff has concluded that these requirements may be relocated from the TSs to the above specified documents.

2.2 Management Titles

The licensee has proposed to replace several specific management titles with generic management functional positions. This change is intended to preclude future amendment requests caused by changes to these titles. The specific positions affected are:

(1) "General Manager - Hope Creek Operations" changed to "plant manager"
(2) "Chief Nuclear Officer and President Nuclear Business Unit" changed to "senior corporate nuclear officer"
(3) "Director - Quality Assurance and Nuclear Safety Review" changed to "senior management position with responsibility for independent nuclear safety assessment activities and quality program oversight"

The specific titles and responsibilities of key organization positions, including those above, will be maintained in licensee controlled documents such as the UFSAR and the Quality Assurance Program. Provided that the generic management functional positions adequately define the individuals responsible for the affected TS requirements, the proposed change is administrative or editorial in nature. The staff has determined that the proposed changes maintain an adequate delineation of the individuals responsible for the various activities and is therefore acceptable.

2.3 Assistant Operations Manager

The licensee has proposed to change the title of the "Operating Engineer" to "Assistant Operations Manager." Provided that the title change reflects organizational changes and maintain adequate assignment of responsibilities to individuals, the proposed change is administrative or editorial in nature. The staff has determined that the proposed change is a straightforward title change and that the responsibilities for the position of Assistant Operations Manager (previously Operating Engineer) have not been changed. The changes

related to the qualification requirements of the Assistant Operations Manager and Operations Manager are addressed below. The staff finds that the title change for the Assistant Operations Manager is acceptable.

2.4 Qualifications for the Operations Manager

2.4.1 Discussion

With regard to qualifications for the "Operations Manager", 10 CFR 50.54(l) requires the licensee to "designate individuals to be responsible for directing the licensed activities of licensed operators. These individuals shall be licensed as senior operators...." The licensee is committed to unit staff qualifications that meet American National Standards Institute (ANSI) ANSI 3.1-1981 for Hope Creek. The qualifications for the Operations Manager, specified in Hope Creek TS 6.3.3, requires the Operations Manager to hold an SRO license for the specific unit at the time of appointment to the active position, or have held an SRO license at a similar unit. In its submittal dated January 11, 1996, as supplemented by letters dated February 26 and July 12, 1996, the licensee proposes that the Operations Manager or Assistant Operations Manager hold an SRO license. If the licensee chooses to have the Assistant Operations Manager hold the SRO license, the minimum qualification for the Operations Manager would be for the manager to "...Have been certified at an appropriate simulator for equivalent senior operator knowledge."

2.4.2 Evaluation

In their submittal dated January 11, 1996, as supplemented by letter dated February 26 and July 12, 1996, the licensee requested a change in Section 6.3.1 of the Technical Specification that would permit an individual who does not have a current SRO license to hold the Operations Manager position. The licensee indicates that the proposed change would require the individual who serves as the Operations Manager to either hold an SRO license, have held an SRO at a similar unit, or have been certified at an appropriate simulator for equivalent senior operator knowledge. To meet the requirements of 10 CFR 50.54(l), the licensee further stated that if the Operations Manager does not hold an SRO license, then the Assistant Operations Manager will hold an SRO license and will also meet the qualification requirements of Section 4.3.8, "Operations" of ANSI/ANS 3.1-1981, "American National Standard for Selection, Qualification, and Testing of Personnel for Nuclear Power Plants," for Hope Creek.

The staff notes that the on-shift operating crews must report directly to and receive overall day-to-day guidance on plant operations from the individual holding the current license in order for the licensee to meet the requirements of 10 CFR 50.54(l). Additionally, in times of transition, that is, those times when the SRO-licensed manager leaves the position, a person with a current SRO license must be made responsible for the crews in order for the licensee to continue to meet the requirements of 10 CFR 50.54(l).

The staff concludes that the specification that either the Operations Manager or the Assistant Operations Manager hold an SRO license is consistent with the requirements of 10 CFR 50.54(l) and ensures that a licensed off-shift senior operator is directing the licensed activities of the licensed operators provided that the crews report directly to and receive overall day-to-day guidance on plant operations from the individual holding the current SRO license. Requiring a qualified (ANSI/ANS-3.1-1981) and SRO-licensed Assistant Operations Manager when the Operations Manager does not hold an SRO license is consistent with the requirements of ANSI N18.1-1981. Moreover, these requirements ensure that there is site-specific, detailed, relevant technical and systems knowledge, in a senior operations management position. Under conditions where the Assistant Operation Manager holds an SRO license, the minimum qualifications for the Operations Manager, having "...been certified at an appropriate simulator for equivalent senior operator knowledge," is in accordance with ANSI/ANS-3.1-1987, and is acceptable.

Therefore, the staff concludes that the proposed change to Hope Creek TS 6.3.1, which allows either the Operations Manager or the Assistant Operations Manager to hold an SRO license is consistent with and meets the intent of the relevant review criteria. The proposed TS change is acceptable provided that the appropriate organizational reporting chain for the crews to the Assistant Operations Manager who holds an SRO license, is in place.

2.5 Editorial Changes/Typographical Errors

The licensee has proposed to correct typographical errors in the Table of Contents, TS Section 6.8.4.a, and TS Section 6.13.2.1. The staff concurs that these changes are appropriate editorial corrections and are acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State Official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets 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 conjunction with the issuance of the amendment.

5.0 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.

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