PSEG Nuclear LLC
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PSEG Nuclear LLC

DEC 1 0 2001

LRN-01-0412
LCR S01-08

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Gentlemen:

EXIGENT REQUEST FOR CHANGE TO TECHNICAL SPECIFICATION 3/4.7.4
SERVICE WATER SYSTEM
SALEM GENERATING STATION UNIT NO. 1
FACILITY OPERATING LICENSE DPR-70
DOCKET NOS. 50-272

In accordance with the requirements of 10CFR50.90, PSEG Nuclear LLC (PSEG) hereby transmits a request for revision of the Technical Specifications (TS) for Salem Generating Station Unit No. 1. Pursuant to the requirements of 10CFR50.91(b)(1), a copy of this request for amendment has been sent to the State of New Jersey.

The proposed change would provide a one-time extension of the time allowed for operation with one nuclear service water header out of service from 72 hours to 10 days. The purpose of the change is to permit repairs to be made to the 12 nuclear service water header without the challenges imposed by an unnecessary plant shutdown. The proposed change has been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and it has been determined that this request involves no significant hazards considerations.

A description of the requested amendment, the reason for the changes, the justification for the changes, and the basis for no significant hazards consideration determination are provided in Attachment 1. The marked up Technical Specification page is provided in Attachment 2. The retyped Technical Specification page is provided in Attachment 3.

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PSEG requests that the proposed change be considered as an exigent situation as described in 10CFR50.91(a)(6) in that failure to act quickly would result in the shutdown of Salem Unit 1. As required by 10CFR50.91(a)(6), a description of the exigent situation is provided in Attachment 1.

PSEG requests approval of this exigent change by December 24, 2001 to be implemented within 30 days of issuance.

Should you have any questions regarding this request, please contact Paul Duke at (856) 339-5456.

Sincerely,

D. F. Garchow

D. F. Garchow
Vice President - Operations

Attachments (3)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on DEC 1 0 2001

D. F. Garchow
Vice President - Operations

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1.0 DESCRIPTION

This letter is a request for a Technical Specification (TS) change to the Operating License for Salem Unit 1, docket number 50-272. This is a one time only change to the Technical Specification Action Statement for the Service Water System. The proposed change revises TS 3/4.7.4 SERVICE WATER SYSTEMS by increasing the allowed outage time for one nuclear header out of service from 72 hours to 10 days.

2.0 PROPOSED CHANGE

The proposed amendment will modify the present Action Statement for TS 3.7.4.1. The new Action Statement will read:

> With only one service water loop OPERABLE, restore at least two loops to OPERABLE status within 72 hours* or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

A note will be added to TS 3.7.4.1 to read as follows:

> * Operation with only the 11 service water loop OPERABLE may continue for up to 10 days. This note is applicable for one time use during Salem Unit No. 1 Cycle 15.

The proposed amendment, as described above, provides the flexibility to perform the required repairs and testing on the number 12 service water nuclear header without the challenges imposed by an unnecessary plant shutdown transient. In addition, during a shutdown condition, the service water system provides cooling water to the Component Cooling Water System, which removes residual and sensible heat from the Reactor Coolant System via the Residual Heat Removal (RHR) system. Therefore, there is no significant difference in nuclear safety risk by repairing the Service Water piping with the plant operating or in hot shutdown. Requiring this repair to be performed during shutdown conditions would result in additional plant equipment and personnel challenges without any significant benefit to the safety of the plant or the health and safety of the public.

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3.0 BACKGROUND

On Friday morning, November 30, 2001, Operations personnel noted water rising up through the gravel in front of the Service Water intake structure. The water was located approximately five feet from the structure and seven feet from the north side stairs, the 12 Service Water nuclear header is located below the location where the water was observed and was considered to be a likely source of the leak.

Subsequent investigation and troubleshooting determined that the leak is associated with the 12 Service Water nuclear supply header. This determination was partially based on the use of a dye test. Based on the information currently available, the leak is postulated to be at an underground mechanical joint or mechanical connection associated with the buried portion of the 12 Service Water nuclear supply header located near the Service Water structure. A simplified diagram of the service water system is provided in Figure 1.

4.0 TECHNICAL ANALYSIS

Design Basis - System Description

The Service Water System (SWS) is designed to supply an adequate supply of cooling water to the reactor safeguard and auxiliary equipment under all credible seismic, flood, drought, and storm conditions. Coolant flow is divided into two portions, namely, the nuclear area and the turbine generator area. The following major equipment is supplied by the SWS:

1. Reactor Containment Building
    a. Reactor containment fan cooler units.
2. Auxiliary Building
    a. Component cooling heat exchangers
    b. Diesel generator units
    c. Chiller condensers
    d. Auxiliary equipment lube oil coolers
    e. Auxiliary equipment room coolers
3. Pump Intake Structure
    a. Traveling screenwash and strainer backwash
    b. Service water pump bearing lubrication
    c. Service water pump motor bearing coolers

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d. Sodium hypochlorite dilution water

The SWS is designed for Class I (seismic) conditions except for the turbine area service water piping outside of the service water intake structure, which is of non-Class I (seismic) design. The Class I (seismic) service water piping inside the service water intake structure which supplies the turbine area is provided with two motor-operated valves to isolate the non-Class I (seismic) portion of the system upon receipt of a safety injection signal or a blackout. The two motor-operated valves in series are powered from separate vital buses to ensure isolation of the non-Class I (seismic) portion of the SWS.

Salem Unit 1 is equipped with six vertical turbine-type pumps, which provide strained Delaware River Water to the plant before discharging via the circulating water outlet piping. The pumps are installed in an enclosed intake structure. Salem Unit 1 has two groups of three pumps valved into one of two independent, full-sized, nuclear supply headers. A double-valved, normally open, interconnection between the two pump headers is provided to permit the continued operation of the system with any combination of pumps in the event of a supply line outage. Each supply line to the nuclear services portion of the SWS normally feeds approximately 1/2 of the total nuclear area requirement.

During normal plant operations 4 service water pumps are required to be operable; however, only 2 or 3 pumps are normally in operation depending on the plant needs and the river water temperature. In the colder winter months, when the river temperature is low, two pumps are enough to support operations. Therefore, the proposed configuration, with 6 OPERABLE Service Water pumps, is sufficient to meet normal operational requirements.

During accident conditions, such as a Loss-of-Coolant Accident (LOCA) the following number of pumps is required:

1. Safety Injection Phase 2
2. Recirculation Phase 3 (*)

(*) Minimum recirculation requirements can be met with two pumps.

Emergency diesel generators are provided to power three pumps during a loss of normal power supply. The diesel generators are also provided with service water for cooling, they can be cooled from either nuclear supply header. Cross connection of the SW headers can be accomplished at the SWS structure or downstream of the main header isolations valves inside the auxiliary building.

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Pipe Rupture

The rupture of a large pipe or any other event causing a high system flow demand will be indicated to the operator by decreasing pump header pressure, and would be shown and alarmed on the main control panel. Low pump header pressure will be alarmed to the main control room. If pump discharge header pressure continues to fall, and outside power is available, a backup service water pump will start automatically.

If the pipe rupture occurs in a watertight pump compartment in the service water intake structure, which is beyond the capacity of the 125-gpm sump pump, high sump level for the affected compartment will be alarmed to the Control Room operators. The Control Room operator can remotely close the appropriate tie valves and header block valves at the intake structure, thus isolating the affected compartment. The SW pumps in the redundant compartment can be remotely started, if necessary, to maintain proper flows to all safety and non-safety equipment, and to permit an orderly plant shutdown, if deemed necessary.

In the event that a main yard supply header is ruptured, the Control Room operator can isolate the affected header as described above, once the rupture header was identified. Furthermore, operators can also open the tie valves inside the Auxiliary Building to maintain flow to safety and non-safety equipment, and to permit an orderly plant shutdown, if deemed necessary.

Design Evaluation

The SWS has been designed to remain operable under each of the following conditions:

1. Any one pump failure and one pump under maintenance
2. Any one pump failure and two pumps under maintenance provided that:
   a. No more than one pump per intake bay is removed from service, and
   b. No more than one pump per vital bus is removed from service
3. One main supply header failure
4. Loss-of-coolant accident coincident with loss of offsite power and subsequent 4-kV vital bus failure.
5. Failure of components such as individual valves that receive active control signals to change position or modulate are addressed as single active failures.

The minimum engineered safeguards equipment required to safely shutdown the unit is not limited by any of the above failures.

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Justification

Two repair options are being considered: (1) use of an internal mechanical seal or (2) repair or replacement of the affected section(s) of the buried concrete pipe. The appropriate repair option will be decided after the internal inspection and evaluation are completed. However regardless of which repair option is selected, the SWS will be capable of performing its intended safety function, which is to provide sufficient cooling capacity to safety related equipment during normal and accident conditions.

To perform the selected repair method, the buried portion of the 12 service water nuclear header will be isolated such that all six service water pumps will be available and capable of supplying cooling water to the safety related equipment via the redundant nuclear header (number 11 header). In this configuration, the UFSAR assumption that two pumps per bay, and at least one powered from each vital bus, are available to mitigate the consequences of a Loss-of-Coolant Accident with a loss of power is maintained. To isolate the leaking section of the buried portion of the 12 nuclear header, the number 3 service water intake bay will be isolated temporarily to permit installation of a blind flange. The total period of time during which the number 3 bay is isolated will be limited to less than the 72 hours currently permitted by TS 3/4.7.4.

The total loss of service water due to a catastrophic failure of the redundant header is a highly unlikely event at Salem. The service water system is classified as moderate energy system. For Salem Unit 1, a moderate energy system is a system where either of the following conditions are met:

1. The maximum operating temperature is 200 °F or less
2. The maximum operating pressure is 275 psig or less

Therefore, the system does not contain enough energy to catastrophically fail. The most likely scenario would be development of a leak; and as noted earlier, the leak could be rapidly detected as a decrease in system pressure, or by sump level alarm. Additionally, as part of a service water reliability improvement program, replacement of portions of the system piping was initiated in 1988 for both Unit 1 and Unit 2. The replacement material selected after an extensive qualification program was 6% molybdenum Austenitic Stainless Steel, which is furnished to the material requirements of the ASME code Section III, Division 1. Since the pipe upgrade, the SWS has been, with a few minor exceptions, leak free. The 12 nuclear supply header was last inspected during outage 1R13, in the fall of 1999. No issues that required repair of the concrete piping in the affected area were noted.

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During the extended AOT, when both Unit 1 intake bays are available, the Service Water system will remain capable of performing its design function in the event of a loss-of coolant accident coincident with a loss of offsite power and a subsequent 4 kV vital bus failure.

In summary, the proposed amendment to the Action Statement for TS 3.7.4.1, Service Water System, to allow an additional 7 days of operations with a service water nuclear header out of service will not affect the ability of the Service Water System to perform its safety function, if required.

Risk Information

Probabilistic Risk Analysis (PRA) was performed in support of this TS Amendment. The PRA assumptions included the ability to supply all Unit 1 loads with the OPERABLE 11 Service Water header and the ability to cross-tie Unit 2 Service Water and Unit 1 Service Water in the unlikely event of a complete loss of Unit 1 Service Water. During the period of the extended allowed outage time, a dedicated operator will be assigned to perform the cross-tie, if required. Cross-connecting the Unit 1 and Unit 2 Service Water systems provides an additional source of cooling for Unit 1.

Additionally, PSEG will maintain the following safety related equipment operable for the duration of this request:

1. The redundant Service Water Nuclear Header
2. All Emergency Diesel Generators
3. All 4kv vital buses

If any of the above equipment becomes INOPERABLE, Salem Unit 1 will commence an orderly shutdown.

Based on the above assumptions, PSA calculated that removing the 12 service water nuclear header from service for a conservatively assumed 11 days would cause a small but acceptable risk increase of approximately 2.89E-08 incremental conditional core damage probability (ICCDP). This incremental increase in total core damage frequency (CDF) is less than 1% of the total calculated internal events core damage frequency. The risk of remaining in operation for 11 days with Service Water Header 12 out-of-service was evaluated using the Salem Level I PSA and LERF model. The base risk was determined by the normal maintenance model. The risk during the extended period was evaluated using the same model with the Service Water Header 12 out of service. Other changes include restrictions on preventive maintenance for the Service Water System during the period evaluated. In addition, the evaluation conservatively assumed that portions of Component Cooling Water System are tagged out but restorable.

The incremental conditional large early release probability (ICLERP) for 11 days is of 3.92E-09. The ICCDP and ICLERP would be considered small risks based on the acceptance criteria for TS changes in Regulatory Guide 1.177.

Compensatory Measures

During the repair to the 12 nuclear service water header, the header will be isolated such that all six service water pumps will be available and capable of supplying cooling water to the safety related equipment via the redundant nuclear header (number 11 header). To isolate the leaking section of the 12 nuclear header, the number 3 service water intake bay will be isolated temporarily to permit installation of a blind flange. The total period of time during which the number 3 bay is isolated will be limited to less than the 72 hours currently permitted by TS 3/4.7.4.

Preventive maintenance activities that could adversely affect the reliability of the Unit 1 service water system will not be performed while only one service water loop is OPERABLE.

Preventive maintenance activities that could adversely affect the reliability of the Unit 1 Emergency Diesel Generators, 4kv vital buses or offsite A.C. electrical power sources will not be performed while the number 3 service water intake bay is isolated.

During the period when number 3 service water intake bay is isolated, a dedicated operator will be assigned to perform the cross-tie from Unit 2 to Unit 1 service water, if required.

Precedent

A similar request was approved by the Nuclear Regulatory Commission for AmerGen Energy Company LLC for Three Mile Island, Unit 1, on February, 23, 2001 (TAC No. MB1187).

5.0 REGULATORY ANALYSIS

The justification of the proposed amendment as described in section 3.0 and 4.0 is consistent with the requirements stipulated in 10 CFR 50.91 relative to the justification for submitting this one time only amendment under exigent basis.

There is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; these activities will be conducted in compliance with the Commission's regulations; and the issuance of this amendment will

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

5.1 No Significant Hazards Consideration (NSHC)

PSEG has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10CFR50.92, "Issuance of amendment," as discussed below:

1. ***Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?***

   Response: No

   The Service Water System (SWS) will remain capable of performing its required safety function. The proposed change results in an insignificant increase in the incremental conditional core damage probability and so does not involve a significant increase in the probability of an accident. The proposed change to extend the allowed outage time from 72 hours to 10 days does not significantly increase consequences of an accident previously evaluated, since the capability of SWS is maintained.

   Therefore, the proposed change will not significantly increase the probability or consequences of any accident previously evaluated.

2. ***Does the proposed change create the possibility of a new or different kind of accident from any accident previously analyzed?***

   Response: No

   The completion of the maintenance activity, the post maintenance testing, and the surveillance testing associated with demonstrating OPERABILITY of 12 service water nuclear header will not result in the plant being operated in a manner that will create the possibility of a new or different kind of accident from any previously evaluated. While repair to the buried portion of the 12 service water nuclear header is in progress, the service water system will be operated as described in the Updated Final Safety Analysis Report. This configuration does not create a new failure mechanism, malfunction or accident initiator.

   Therefore, the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

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3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The 11 service water nuclear header will remain operational and capable of performing its required safety functions. Sufficient safety-related equipment and systems will remain available to ensure that the consequences of design basis transients and accidents are mitigated as assumed in the Salem UFSAR. Preventive maintenance activities that could adversely affect the reliability of the Unit 1 service water system, Emergency Diesel Generators, 4kv vital buses or offsite A.C. electrical power sources will be controlled during the extended allowed outage time.

Therefore, the proposed change involves no significant reduction in the margins of safety as discussed in the bases for the Technical Specifications.

Based on the above, PSEG concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10CFR50.92(C), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Regulatory Requirements And Guidance

1. NUREG 1431 Rev 2 "Standard Technical Specifications Westinghouse Plants"

2. 10CFR100, 10CFR50, Appendix A, and 10CFR50.91

5.3 Explanation Of Exigent Circumstances

The pipe containing the postulated leak is buried underground. Upon discovery of the leak, Operations determined that the OPERABILTY of the Service Water system was not affected by this leak. Subsequently, a formal Operability Determination was performed that confirmed this determination.

PSEG could not have foreseen the need for a TS amendment prior to the indication of the leakage. The 12 nuclear supply header was inspected during outage 1R13, in the fall of 1999. No issues that required repair of the concrete piping in the affected area were noted. The nuclear supply headers are scheduled to be inspected every 3 years (one per refueling outage on a staggered basis). The 11 nuclear supply header was last inspected in April 2001, which gives us reasonable assurance that its structural integrity remains intact. This submittal was made as soon as practical after a detailed investigation and development of the repair plan.

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PSEG has aggressively pursued identification and resolution of the identified leakage. On November 30, 2001, PSEG operations personnel, who observed water rising up through the ground, discovered the leakage. On December 2, the leak location was identified through the use of a tracer chemical, which confirmed that the leak was associated with the 12 Service Water nuclear supply header.

In the area where the leak is suspected the Service Water nuclear supply header is 24" nominal diameter buried piping. This piping design is pre-stressed concrete cylindrical water pipe, which uses either standard flanged fittings, or flexible tied extensible bell bolt type joints for the major connections.

The inspection and repair plan, which is being aggressively pursued for this leak, involves removing the 12 Service Water nuclear supply header from service and performing an internal inspection of the affected piping area. There are two repair options that have been developed. The preferred option is the use of an internal mechanical seal. This type of repair meets the Service Water design requirements, and has been used successfully on buried concrete piping in both nuclear and non-nuclear applications. The second is replacement of the affected section(s) of the buried concrete pipe. The appropriate repair option will be decided after the internal inspection and evaluation is completed.

Schedule analysis has determined that the internal inspection and internal repair of the affected piping can be completed within 10 days. PSEG Nuclear is requesting an exigent TS change to TS 3/4.7.4 to allow Salem Unit 1 to perform repairs and testing of the 12 nuclear supply header. Absent NRC approval of this request, Salem Unit 1 will have to be placed in a shutdown transient to implement the approved repairs. The integrity of the Reactor Coolant System, fuel, and other components of the primary system of a nuclear power plant can be adversely affected by the number of transients that they are subjected to during plant life. The cycling of the unit through a thermal transient also challenges both the secondary plant systems and the operators. Avoiding these transients, provided that the health and safety of the public and plant personnel is not compromised, is a prudent action.

In addition, during shutdown, the service water system provides cooling water to the Component Cooling System, which removes residual and sensible heat from the Reactor Coolant System via the Residual Heat Removal (RHR) during plant shutdown. Therefore, because Service Water is required during shutdown as well as during normal operations, there is no significant difference in nuclear safety risk by repairing the Service Water piping with the plant operating or in HOT SHUTDOWN. Therefore, requiring this repair to be performed during shutdown conditions would result in

additional plant equipment and personnel challenges without any significant benefit to the safety of the plant or the health and safety of the public.

While the 12 Service Water nuclear supply header is currently OPERABLE, PSEG believes that repairs will be required before the next scheduled refueling outage. Prompt repair of the leaking header takes advantage of the current weather and river water temperature conditions which minimize the impact of the requested change.

6.0 ENVIRONMENTAL CONSIDERATIONS

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10CFR20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22(C)(9). Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 REFERENCES

1. Salem Generating Station Updated Final Safety Analysis Report.

2. Regulatory Guide 1.177, An Approach for Plant-Specific, Risk-Informed Decision making: Technical Specifications, August 1998

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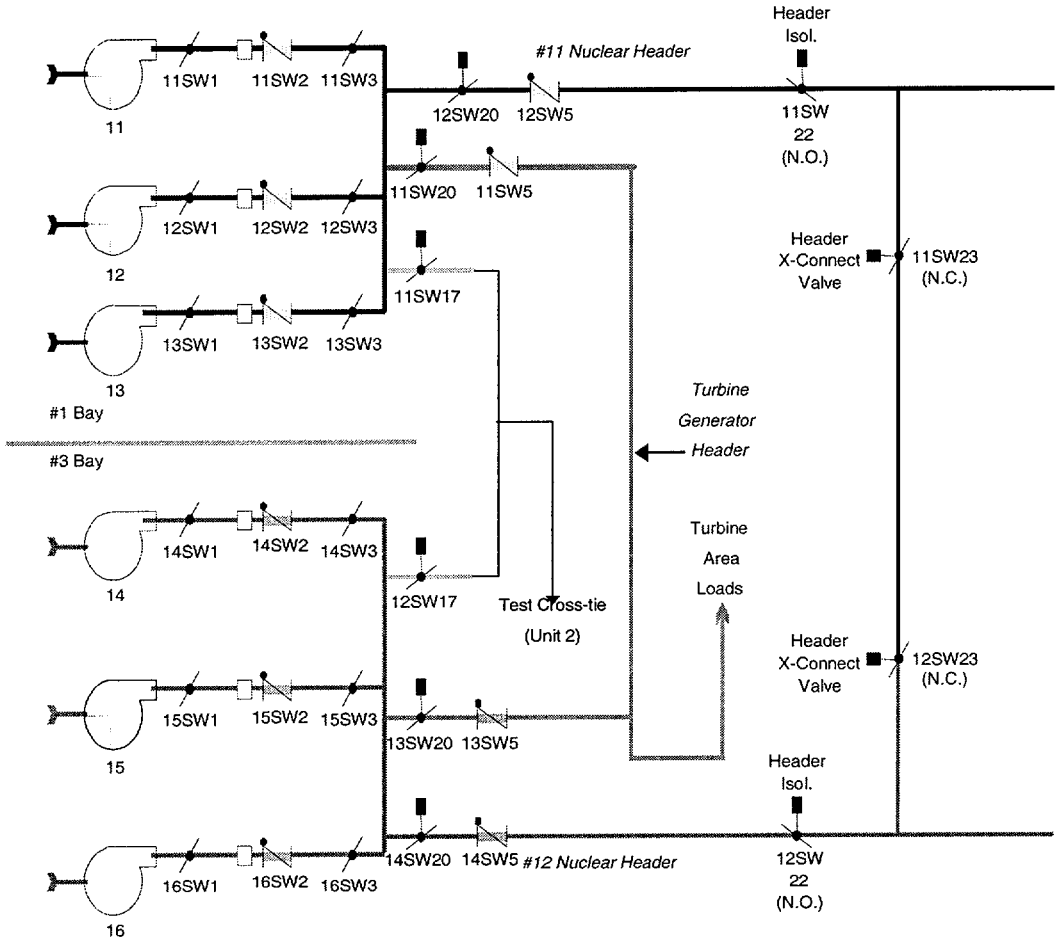
FIGURE 1
SALEM UNIT 1 SERVICE WATER SYSTEM



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TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES

The following Technical Specifications for Facility Operating License DPR-75 are affected by this change request:

Technical Specification	Page
3.7.4.1	3/4 7-16

PLANT SYSTEMS

3/4.7.4 SERVICE WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.4.1 At least two independent service water loops shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one service water loop OPERABLE, restore at least two loops to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.4.1 At least two service water loops shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position.

b. At least once per 18 months during shutdown, by verifying that each automatic valve servicing safety related equipment actuates to its correct position on Safeguards Initiation signal.

INSERT A

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Insert A:

* Operation with only the 11 service water loop OPERABLE may continue for up to 10 days. This note is applicable for one time use during Salem Unit No. 1 Cycle 15.

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RETYPED TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES

The following Technical Specifications for Facility Operating License DPR-75 are affected by this change request:

Technical Specification	Page
3.7.4.1	3/4 7-16

3/4.7.4 SERVICE WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.4.1 At least two independent service water loops shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With only one service water loop OPERABLE, restore at least two loops to OPERABLE status within 72 hours * or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.4.1 At least two service water loops shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power operated or automatic) servicing safety related equipment that is not locked, sealed, or otherwise secured in position, is in its correct position.

b. At least once per 18 months during shutdown, by verifying that each automatic valve servicing safety related equipment actuates to its correct position on Safeguards Initiation signal.

* Operation with only the 11 service water loop OPERABLE may continue for up to 10 days. This note is applicable for one time use during Salem Unit No.1 Cycle 15.