

APR 15 2002

LR-N02-0083
LCR S01-06



United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

**SUPPLEMENT TO REQUEST FOR CHANGE TO
TECHNICAL SPECIFICATION 3.9.1
BORON CONCENTRATION
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311**

By letter dated September 24, 2001 (Reference LRN-01-0192), PSEG Nuclear LLC (PSEG) submitted a request for revision of the Technical Specifications (TS) for Salem Generating Station Unit Nos. 1 and 2 respectively. The original request inadvertently left out a page from each of the Salem's Technical Specifications that were affected by the requested change.

Administrative TS 6.9.1.9 describes the Core Operating Limit Report (COLR). Specifically, TS 6.9.1.9 lists the TS requirements that are included in the COLR. Therefore as a result of this submittal the refueling boron concentration should have been included as one of the TS requirements listed in the COLR. The affected pages are included as Attachment 1 to this letter, and Attachment 2 contains insert A to the affected pages.

Additionally PSEG provides the following information as a result of a teleconference between PSEG and NRC personnel regarding the spent fuel boron concentration. Although PSEG's TS do not contain a limiting condition for operation establishing a minimum boron concentration requirement in the spent fuel pit, plant chemistry procedures ensure that the spent fuel pit boron concentration is maintained at a minimum limit of greater than or equal to 2000 ppm. In addition, operations department refueling procedure require that the boron concentration of the reactor coolant system and the refueling canal be verified within limits prior to entering Mode 6 and every 72 hours whenever water is present in the refueling canal. These administrative controls ensure that the boron concentration of the spent fuel pit, the reactor cavity, the refueling canal, and the reactor coolant system will be maintained at uniform concentration above the minimum required value.

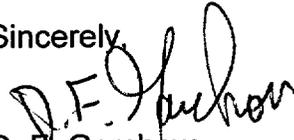
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The original evaluation in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), forwarded as attachment 1 by letter LRN-01-0192 is enclosed as Attachment 3 to this letter and remains unchanged.

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

Sincerely,

A handwritten signature in black ink, appearing to read "D. F. Garchow". The signature is written in a cursive style with a large, looping initial "D".

D. F. Garchow
Vice President - Operations

Affidavit
Attachments (3)

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**SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311
CHANGE TO TECHNICAL SPECIFICATIONS**

TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES

The following Technical Specifications for Facility Operating License DPR-70 are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
6.9.1.9	6 - 24

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

<u>Technical Specification</u>	<u>Page</u>
6.9.1.9	6 - 24

ADMINISTRATIVE CONTROLS

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6.9.1.9 CORE OPERATING LIMITS REPORT (COLR)

1. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. Moderator Temperature Coefficient Beginning of Life (BOL) and End of Life (EOL) limits and 300 ppm surveillance limit for Specification 3/4.1.1.3,
2. Control Bank Insertion Limits for Specification 3/4.1.3.5,
3. Axial Flux Difference Limits and target band for Specification 3/4.2.1,
4. Heat Flux Hot Channel Factor, F_Q , its variation with core height, $K(z)$, and Power Factor Multiplier PF_{xy} , Specification 3/4.2.2, and
5. Nuclear Enthalpy Hot Channel Factor, and Power Factor Multiplier, $PF_{\Delta H}$ for Specification 3/4.2.3.

INSERT A

b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

1. WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985 (W Proprietary), Methodology for Specifications listed in 6.9.1.9.a. Approved by Safety Evaluation dated May 28, 1985.

6.9.1.9 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Moderator Temperature Coefficient Beginning of Life (BOL) and End of Life (EOL) limits and 300 ppm surveillance limit for Specification 3/4.1.1.4,
 2. Control Bank Insertion Limits for Specification 3/4.1.3.5,
 3. Axial Flux Difference Limits and target band for Specification 3/4.2.1,
 4. Heat Flux Hot Channel Factor, F_0 , its variation with core height, $K(z)$, and Power Factor Multiplier PF_{xy} , Specification 3/4.2.2, and
 5. Nuclear Enthalpy Hot Channel Factor, and Power Factor Multiplier, PF_{PH} for Specification 3/4.2.3.

INSERT A

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
1. WCAP-9272-P-A, Westinghouse Reload Safety Evaluation Methodology, July 1985 (W Proprietary), Methodology for Specifications listed in 6.9.1.9.a. Approved by Safety Evaluation dated May 28, 1985.

**ATTACHMENT 2
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INSERT A

6. Refueling boron concentration per Specification 3.9.1

**ATTACHMENT 3
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**SALEM GENERATING STATION
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**7.0 DETERMINATION OF NO SIGNIFICANT HAZARDS
CONSIDERATION - 10CFR50.92 EVALUATION**

PSEG Nuclear LLC 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. *Will not involve a significant increase in the probability or consequences of an accident previously evaluated.*

Response: No

The proposed Technical Specification change revises the Salem Technical Specification 3/4.9 REFUELING OPERATIONS to be consistent with the Standard Technical Specifications Westinghouse Plants (NUREG-1431 Rev.2). Relocating the required boron concentration from the Technical Specification to the Core Operating Limits Report (COLR) is not an accident initiator. Relocation of the required minimum boron concentration to the COLR will ensure that the proper boron concentration will be maintained in accordance with all the assumptions of the appropriate accident analysis.

The proposed change to revise the surveillance testing brings consistency between the new limiting condition for operations wording and the testing requirement. Therefore, the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. *Does not create the possibility of a new or different kind of accident from any accident previously analyzed.*

Response: No

The proposed Technical Specification change revises the Salem Technical Specification 3/4.9 REFUELING OPERATIONS to be consistent with the Standard Technical Specifications Westinghouse Plants (NUREG-1431 Rev.2). The proposed revision does not change the physical facility or the manner that the plant is operated or tested. The manner and frequency at which the surveillance test is conducted remains unchanged. The proposed change to revise the surveillance testing brings consistency between the new limiting condition for operations wording and the testing requirement.

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Therefore, the new proposed change to relocate the required boron concentration to the COLR does not create the possibility of a new or different kind of accident from any accident previously analyzed.

3. Does not involve a significant reduction in a margin of safety.

Response: No

The proposed Technical Specification change revises the Salem Technical Specification 3/4.9 REFUELING OPERATIONS to be consistent with the Standard Technical Specifications Westinghouse Plants (NUREG-1431 Rev.2).

The COLR is performed as part of each core reload safety evaluation to ensure that the limits of safety analysis are met. The analytical methods utilized to calculate the core operating limits are those reviewed and approved by the NRC and specified in the Salem Technical Specifications Section 6.9. Additionally, the COLR is submitted to the NRC in accordance with the requirements of the Salem Technical Specifications Section 6.9.

Therefore, the new proposed change to relocate the required boron concentration to the COLR does not involve a significant reduction in a margin of safety.

Based on the above, PSEG concludes that the proposed amendment presents no significant hazard consideration under the standards set forth in 10 CFR 50.92(c), and accordingly, a finding of "no significant hazards consideration" is justified.