

JAN 24 2003



LR-N03-0018
Bases Change S02-11B

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

Gentlemen:

**TECHNICAL SPECIFICATION BASES CHANGE
SALEM GENERATING STATION UNIT NOS. 1 AND 2
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311**

PSEG Nuclear LLC is providing revised Technical Specification (TS) Bases pages for Specifications 3/4.6.3 and 3/4.7.1.5. The revised pages were reviewed in accordance with the requirements of 10 CFR 50.59.

TS 3/4.6.3 pertains to containment isolation valves. The TS Bases have been revised to state that main steam isolation valves fulfill their containment isolation function as remote-manual containment isolation valves. Additionally, the Bases have been clarified to state that, for containment isolation purposes, the main steam isolation valves are tested pursuant to specification 4.0.5.

TS 3/4.7.1.5 pertains to main steam isolation valves. The TS Bases have been revised to describe the plant conditions for testing the main steam isolation function in accordance with surveillance requirement 4.7.1.5.

Attachment 1 contains the revised pages for the Salem Unit 1 Technical Specification Bases. Attachment 2 contains the revised pages for the Salem Unit 2 Technical Specification Bases. Please incorporate these changes into the Technical Specification Bases.

Should you have any questions regarding this submittal, please contact Paul Duke at 856-339-1466.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Salamon", with a long horizontal flourish extending to the right.

G. Salamon
Manager – Nuclear Safety & Licensing

Attachments (2)

Pool

**C Mr. H. Miller, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406**

**Mr. R. Fretz
Licensing Project Manager - Salem
U. S. Nuclear Regulatory Commission
Mail Stop 08B2
Washington, DC 20555**

USNRC Senior Resident Inspector - Salem (X24)

**Mr. K. Tosch, Manager IV
Bureau of Nuclear Engineering
P. O. Box 415
Trenton, NJ 08625**

**SALEM GENERATING STATION UNIT 1
FACILITY OPERATING LICENSE DPR-70
DOCKET NO. 50-272
REVISIONS TO THE TECHNICAL SPECIFICATIONS BASES**

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CONTAINMENT SYSTEMS

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valve response time test ensures that on a loss of offsite power, each discharge valve actuates to the open position in accordance with the design to allow sufficient tank discharge into CFCU piping to maintain water filled, subcooled fluid conditions in three CFCU cooling loops, assuming the most limiting single failure.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The opening of locked or sealed closed containment isolation valves (penetration flow paths) on an intermittent basis under administrative control includes the following considerations: (1) stationing a dedicated individual, who is in constant communication with the control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

The main steam isolation valves (MSIVs) fulfill their containment isolation function as remote-manual containment isolation valves. The automatic closure of the MSIVs is not required for containment isolation due to having a closed system inside containment. The remote-manual containment isolation function of the MSIVs can be accomplished through either the use of the hydraulic operator or when the MSIV has been tested in accordance with surveillance requirement 4.7.1.5 the steam assist function can be credited.

Surveillance Requirement (SR) 4.6.3.1.3 only applies to the MS7 (Main Steam Drain) valves and the MS18 (Main Steam Bypass) valves. The MS167 (Main Steam Isolation) valves are tested for main steam isolation purposes by SR 4.7.1.5. For containment isolation purposes, the MS167s are tested as remote/manual valves pursuant to Specification 4.0.5.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water and 3) corrosion of metals within containment.

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3/4.7.1.4 ACTIVITY

The limitations on secondary system specific activity ensure that the resultant off-site radiation dose will be limited to a small fraction of 10 CFR Part 100 limits in the event of a steam line rupture. This dose also includes the effects of a coincident 1.0 GPM primary to secondary tube leak in the steam generator of the affected steam line. These values are consistent with the assumptions used in the accident analyses.

3/4.7.1.5 MAIN STEAM LINE ISOLATION VALVES

The OPERABILITY of the main steam line isolation valves ensures that no more than one steam generator will blowdown in the event of a steam line rupture. This restriction is required to 1) minimize the positive reactivity effects of the Reactor Coolant System cooldown associated with the blowdown, and 2) limit the pressure rise within containment in the event the steam line rupture occurs within containment. The OPERABILITY of the main steam isolation valves within the closure times of the surveillance requirements are consistent with the assumptions used in the accident analyses.

If the closure time of the main steam isolation valve (MSIV) during technical specification surveillance testing (performed at a Steam Generator pressure between 800 psig and 1015 psig) is 5.0 seconds or less and the engineered safety feature response time (including valve closure time) for the steam line isolation (MSI) signal (Table 3.3-5) is 5.5 seconds or less, then assurance is provided that MSI occurs within 12 seconds under accident conditions, where Steam Generator pressure may be lower. This method of testing assures that for main steam line ruptures that are initiated from Modes 1-3 conditions that generate a MSI signal via automatic or manual initiation and have adequate steam line pressure to close, the main steam lines isolate within the time required by the accident analysis. Fast closure of the MSIVs is assured at a minimum steam pressure of 170 psia. However, the MSIV will still close via the steam assist function between 118 - 170 psia with slightly greater closure times. For main steam line ruptures that receive an automatic or manual signal for MSI and do not have adequate steam pressure to close the MSIVs (less than 118 psia), the event does not require MSIV closure to provide protection to satisfy design basis requirements (e.g., minimum DNBR remains above the minimum DNBR limit value and peak containment pressure remains below 47 psig).

Testing for SR 4.7.1.5 is performed prior to opening the MSIVs for power operation. During testing, only one valve is opened at a time, with the other three valves remaining closed in the safe position, ensuring isolation capability is maintained. In the event of a steam line rupture, a postulated failure of the tested valve in the open position would result in the blowdown of a single steam generator since the remaining three MSIVs are closed. Failure of a single MSIV to close is consistent with the accident analysis assumptions for a major secondary system pipe rupture (UFSAR Section 15.4.2).

**SALEM GENERATING STATION UNIT 2
FACILITY OPERATING LICENSE DPR-75
DOCKET NO. 50-311
REVISIONS TO THE TECHNICAL SPECIFICATIONS BASES**

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CONTAINMENT SYSTEMS

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3/4.6.2 DEPRESSURIZATION AND COOLING SYSTEMS

3/4.6.2.1 CONTAINMENT SPRAY SYSTEM

The OPERABILITY of the containment spray system ensures that containment depressurization and cooling capability will be available in the event of a LOCA. The pressure reduction and resultant lower containment leakage rate are consistent with the assumptions used in the accident analyses.

The containment spray system and the containment cooling system are redundant to each other in providing post accident cooling of the containment atmosphere. However, the containment spray system also provides a mechanism for removing iodine from the containment atmosphere and therefore the time requirements for restoring an inoperable spray system to OPERABLE status have been maintained consistent with that assigned other inoperable ESF equipment.

Normal plant operation and maintenance practices are not expected to trigger surveillance requirement 4.6.2.1.d. Only an unanticipated circumstance would initiate this surveillance, such as inadvertent spray actuation, a major configuration change, or a loss of foreign material control when working within the affected boundary of the system. If an activity occurred that presents the potential of creating nozzle blockage, an evaluation would be performed by the engineering organization to determine if the amount of nozzle blockage would impact the required design capabilities of the containment spray system. If the evaluation determines that the containment spray system would continue to perform its design basis function, then performance of the air or smoke flow test would not be required. If the evaluation cannot conclusively determine the impact to the containment spray system, then the air or smoke flow test would be performed to determine if any nozzle blockage has occurred.

3/4.6.2.2 SPRAY ADDITIVE SYSTEM

The OPERABILITY of the spray additive system ensures that sufficient NaOH is added to the containment spray in the event of a LOCA. The limits on NaOH volume and concentration, ensure that 1) the iodine removal efficiency of the spray water is maintained because of the increase in pH value, and 2) corrosion effects on components within containment are minimized. The contained water volume limit includes an allowance for water not usable because of tank discharge line location or other physical characteristics. These assumptions are consistent with the iodine removal efficiency assumed in the accident analyses.

3/4.6.2.3 CONTAINMENT COOLING SYSTEM

The OPERABILITY of the containment cooling system ensures that adequate heat removal capacity is available when operated in conjunction with the containment spray systems during post-LOCA conditions.

The containment cooling system and the containment spray system are redundant to each other in providing post accident cooling of the containment atmosphere. As a result of this redundancy in cooling capability, the allowable out of service time requirements for the containment cooling system have been appropriately adjusted. However, the allowable out of service time requirements for the containment spray system have been maintained consistent with that assigned other inoperable ESF equipment since the containment spray system also provides a mechanism for removing iodine from the containment atmosphere.

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The surveillance requirements for the service water accumulator vessels ensure each tank contains sufficient water and nitrogen to maintain water filled, subcooled fluid conditions in three containment fan coil unit (CFCU) cooling loops in response to a loss of offsite power, without injecting nitrogen covergas into the containment fan coil unit loops assuming the most limiting single failure. The surveillance requirement for the discharge valve response time test ensures that on a loss of offsite power, each discharge valve actuates to the open position in accordance with the design to allow sufficient tank discharge into CFCU piping to maintain water filled, subcooled fluid conditions in three CFCU cooling loops, assuming the most limiting single failure.

3/4.6.3 CONTAINMENT ISOLATION VALVES

The OPERABILITY of the containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The opening of locked or sealed closed containment isolation valves (penetration flow paths) on an intermittent basis under administrative control includes the following considerations: (1) stationing a dedicated individual, who is in constant communication with the control room, at the valve controls, (2) instructing this individual to close these valves in an accident situation, and (3) assuring that the environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the containment.

The main steam isolation valves (MSIVs) fulfill their containment isolation function as remote-manual containment isolation valves. The automatic closure of the MSIVs is not required for containment isolation due to having a closed system inside containment. The remote-manual containment isolation function of the MSIVs can be accomplished through either the use of the hydraulic operator or when the MSIV has been tested in accordance with surveillance requirement 4.7.1.5 the steam assist closure function can be credited.

Surveillance Requirement (SR) 4.6.3.3 only applies to the MS7 (Main Steam Drain) valves and the MS18 (Main Steam Bypass) valves. The MS167 (Main Steam Isolation) valves are tested for main steam isolation purposes by SR 4.7.1.5. For containment isolation purposes, the MS167s are tested as remote/manual valves pursuant to Specification 4.0.5.

3/4.6.4 COMBUSTIBLE GAS CONTROL

The OPERABILITY of the equipment and systems required for the detection and control of hydrogen gas ensures that this equipment will be available to maintain the hydrogen concentration within containment below its flammable limit during post-LOCA conditions. Either recombiner unit is capable of controlling the expected hydrogen generation associated with 1) zirconium-water reactions, 2) radiolytic decomposition of water, and 3) corrosion of metals within containment. These hydrogen control systems are consistent with the recommendations of Regulatory Guide 1.7, "Control of Combustible Gas Concentrations in Containment Following a LOCA," March 1971.

PLANT SYSTEMS

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3/4.7.1.4 ACTIVITY

The limitations on secondary system specific activity ensure that the resultant offsite radiation dose will be limited to a small fraction of 10 CFR Part 100 limits in the event of a steam line rupture. This dose also includes the effects of a coincident 1.0 GPM primary to secondary tube leak in the steam generator of the affected steam line. These values are consistent with the assumptions used in the accident analyses.

3/4.7.1.5 MAIN STEAM LINE ISOLATION VALVES

The OPERABILITY of the main steam line isolation valves ensures that no more than one steam generator will blowdown in the event of a steam line rupture. This restriction is required to 1) minimize the positive reactivity effects of the Reactor Coolant System cooldown associated with the blowdown, and 2) limit the pressure rise within containment in the event the main steam line rupture occurs within containment. The OPERABILITY of the main steam isolation valves within the closure times of the surveillance requirements are consistent with the assumptions used in the accident analyses.

If the closure time of the main steam isolation valve (MSIV) during technical specification surveillance testing (performed at a Steam Generator pressure between 800 psig and 1015 psig) is 5.0 seconds or less and the engineered safety feature response time (including valve closure time) for the steam line isolation (MSI) signal (Table 3.3-5) is 5.5 seconds or less, then assurance is provided that MSI occurs within 12 seconds under accident conditions, where Steam Generator pressure may be lower. This method of testing assures that for main steam line ruptures that are initiated from Modes 1-3 conditions that generate a MSI signal via automatic or manual initiation and have adequate steam line pressure to close, the main steam lines isolate within the time required by the accident analysis. Fast closure of the MSIVs is assured at a minimum steam pressure of 170 psia. However, the MSIV will still close via the steam assist function between 118 - 170 psia with slightly greater closure times. For main steam line ruptures that receive an automatic or manual signal for MSI and do not have adequate steam pressure to close the MSIVs (less than 118 psia), the event does not require MSIV closure to provide protection to satisfy design basis requirements (e.g., minimum DNBR remains above the minimum DNBR limit value and peak containment pressure remains below 47 psig).

Testing for SR 4.7.1.5 is performed prior to opening the MSIVs for power operation. During testing, only one valve is opened at a time, with the other three valves remaining closed in the safe position, ensuring isolation capability is maintained. In the event of a steam line rupture, a postulated failure of the tested valve in the open position would result in the blowdown of a single steam generator since the remaining three MSIVs are closed. Failure of a single MSIV to close is consistent with the accident analysis assumptions for a major secondary system pipe rupture (UFSAR Section 15.4.2).