

JAN 29 2003



LR-N03-0014
LCR S03-01

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Gentlemen:

**REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
ADMINISTRATIVE AND EDITORIAL CHANGES
SALEM GENERATING STATION UNITS 1 AND 2
FACILITY OPERATING LICENSES NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311**

Pursuant to 10 CFR 50.90, PSEG Nuclear LLC (PSEG) hereby requests a revision to the Technical Specifications (TSs) for Salem Generating Station Units 1 and 2. In accordance with 10CFR50.91(b)(1), a copy of this submittal has been sent to the State of New Jersey.

The proposed amendment corrects errors in the TSs for Salem Units 1 and 2.

PSEG has evaluated the proposed changes in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and has determined this request involves no significant hazards considerations. An evaluation of the requested changes is provided in Attachment 1 to this letter. The marked up Technical Specification pages affected by the proposed changes are provided in Attachment 2.

PSEG requests approval of the proposed License Amendment by September 1, 2003 to be implemented within 60 days.

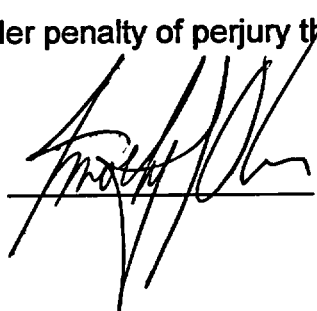
If you have any questions or require additional information, please contact Mr. Paul Duke at (856) 339-1466.

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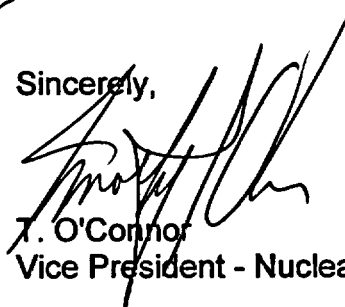
JAN 29 2003

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

Executed on


1/27/03

Sincerely,



T. O'Connor
Vice President - Nuclear Operations

Attachments (2)

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**SALEM GENERATING STATION UNITS 1 AND 2
FACILITY OPERATING LICENSES NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311**

**EVALUATION OF REVISIONS TO THE TECHNICAL SPECIFICATIONS
EDITORIAL CHANGES**

Table of Contents

1.	DESCRIPTION	1
2.	PROPOSED CHANGE	1
3.	BACKGROUND	1
4.	TECHNICAL ANALYSIS	2
5.	REGULATORY SAFETY ANALYSIS.....	3
5.1	No Significant Hazards Consideration.....	3
5.2	Applicable Regulatory Requirements/Criteria.....	4
6.	ENVIRONMENTAL CONSIDERATION	4
7.	REFERENCES	4

**REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
EDITORIAL CHANGES**

1. DESCRIPTION

The proposed amendment corrects errors in the Salem Unit 1 and 2 Technical Specifications (TSs).

2. PROPOSED CHANGE

The following changes are proposed:

- a. The second equation in Salem Unit 2 Limiting Condition for Operation (LCO) 3.2.2 on page 3/4 2-5 will be revised to read as follows:

$$F_q(z) \leq \frac{F_q^{RTP}}{0.5} * K(z) \text{ for } P \leq 0.5, \text{ and}$$

- b. Salem Unit 2 TS Table 3.3-6 will be revised to indicate that one operable channel of containment air particulate activity reactor coolant system (RCS) leakage detection instrumentation is required for operation in Modes 1 through 4.
- c. Salem Unit 1 TS 3/4.7.6 Action Statements "d." (for Modes 1, 2, 3 and 4) and "e." (for Modes 5 and 6) will be revised to refer to Action 25 in TS Table 3.3-6. Salem Unit 2 TS 3/4.7.6 Action Statements "d." (for Modes 1, 2, 3 and 4) and "e." (for Modes 5 and 6) will be revised to refer to Action 28 in TS Table 3.3-6.

3. BACKGROUND

- a. LCO 3.2.2 defines limits for the heat flux hot channel factor $F_q(z)$ in two equations, one applicable when thermal power is greater than 50% of rated thermal power ($P > 0.5$), and the other applicable when thermal power is less than or equal to 50% of rated thermal power ($P \leq 0.5$). Salem Unit 2 TS 3.2.2 incorrectly indicates that both equations are applicable for $P > 0.5$. The limits were correctly stated in License Change Request S94-41 (Reference 1). Salem Unit 1 LCO 3.2.2 and the Core Operating Limits Reports for Salem Units 1 and 2 contain the correct limit.

The error was introduced during preparation of the retyped pages for Salem Unit 2 TS Amendment 197 (Reference 2).

- b. TS Table 3.3-6 contains a list of radiation monitoring instruments and associated operability requirements. For containment air particulate activity RCS leakage detection, one channel is required per Reference 3,

but the required minimum number of operable channels is omitted from the table in the Salem Unit 2 TSs. This error appears to have been introduced during the preparation of retyped pages for implementation of Salem Unit 2 TS Amendment 173 (Reference 4).

Table 3.3-6 in the Salem Unit 1 TSs contains the correct information.

- c. TS 3/4.7.6 describes the operability requirements for the common control room emergency air conditioning system (CREACS). In Modes 1, 2, 3 and 4, with one or both series isolation dampers on a normal Control Area Air Conditioning System (CAACS) outside air intake or exhaust duct inoperable, Action Statement "d." applies. If a normal outside air intake isolation damper is inoperable, the required action (securing at least one intake isolation damper in the closed position) causes both radiation monitors in the affected intake to be inoperable. Action Statement "d." refers to TS Table 3.3-6 Action 24 [27 for Unit 2] which applies to operation with one intake radiation monitor inoperable. For operation with both intake radiation monitors inoperable, TS Table 3.3-6 Action 25 [28 for Unit 2] applies.

The same error also exists in Action Statement "e." for Modes 5 and 6.

This error resulted from changes to TS Table 3.3-6 that were part of Amendment 225 for Unit 1 and Amendment 206 for Unit 2 (Reference 5). Previously, TS Table 3.3-6 Action 24 [27 for Unit 2] contained the required actions for operation with one and with both radiation monitor channels inoperable in a control room air intake. In Amendment Nos. 225 and 206, the single Action was divided into two separate Actions 24 and 25 [27 and 28 for Unit 2]. TS 3/4.7.6 Action Statements "d." (for Modes 1, 2, 3 and 4) and "e." (for Modes 5 and 6) were not revised to reflect the change to TS Table 3.3-6.

4. TECHNICAL ANALYSIS

- a. The proposed change to Salem Unit 2 LCO 3.2.2 is editorial in nature, correcting a typographical error.
- b. The proposed change to Salem Unit 2 TS Table 3.3-6 is editorial in nature, correcting a typographical error.
- c. The proposed changes to TS 3/4.7.6 Action Statements "d." (for Modes 1, 2, 3 and 4) and "e." (for Modes 5 and 6) are administrative in nature, correcting an inconsistency between TS sections.

None of the proposed changes affect the intent of any TS requirements.

5. REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration

PSEG Nuclear LLC (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 10 CFR 50.92, "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 proposed changes to the TSs are administrative or editorial in nature and do not change the intent of any Technical Specification requirement. No changes are being made to any plant systems, structures or components (SSCs).

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed administrative and editorial changes to the TSs do not change the design function or operation of any plant equipment. Additionally, no new modes of plant operation are involved with these changes.

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

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

Response: No.

The proposed changes are administrative and editorial corrections to the TSs that do not affect the ability of plant SSCs to perform their design basis accident functions. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Therefore, if the proposed change does not involve a significant reduction in a margin of safety.

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

5.2 Applicable Regulatory Requirements/Criteria

The proposed changes are editorial and administrative in nature. They correct errors in the current Salem Units 1 and 2 TSs and do not affect the intent of any TS requirements.

In conclusion, based on the considerations discussed above, (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.

6. ENVIRONMENTAL CONSIDERATION

PSEG has determined 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 10 CFR 20, or would change an inspection or a surveillance requirement. 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 effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

7. REFERENCES

- 1. PSE&G letter LR-N96114, "Request for Change to Technical Specifications, Margin Recovery Program," May 10, 1996**
- 2. Amendment No. 197 to Facility Operating License No. DPR-75 for the Salem Nuclear Generating Station, Unit No. 2, January 8, 1999 (TAC No. M95384)**

3. **Amendment No. 138 to Facility Operating License No. DPR-75 for the Salem Nuclear Generating Station, Unit No. 2, September 8, 1994 (TAC No. M89561)**
4. **Amendment No. 173 to Facility Operating License No. DPR-75 for the Salem Nuclear Generating Station, Unit No. 2, February 6, 1997 (TAC No. M95692)**
5. **Amendment Nos. 225 and 206 to Facility Operating License Nos. DPR-70 and DPR-75 for the Salem Nuclear Generating Station, Unit Nos. 1 and 2, November 2, 1999 (TAC Nos. MA0180 and MA0181)**

**SALEM NUCLEAR GENERATING STATION, UNITS 1 AND 2
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311
REVISIONS TO THE 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>
3.7.6.1	3/4 7-18 3/4 7-19

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

<u>Technical Specification</u>	<u>Page</u>
3/4.2.2	3/4 2-5
Table 3.3-6	3/4 3-39
3/4.7.6	3/4 7-15 3/4 7-16

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM EMERGENCY AIR CONDITIONING SYSTEM

LIMITING CONDITION FOR OPERATION

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3.7.6.1 The common control room emergency air conditioning system (CREACS)* shall be OPERABLE with:

- a. Two independent air conditioning filtration trains (one from each unit) consisting of:
 - 1. Two fans and associated outlet dampers,
 - 2. One cooling coil,
 - 3. One charcoal adsorber and HEPA filter array,
 - 4. Return air isolation damper.
- b. All other automatic dampers required for operation in the pressurization or recirculation modes.
- c. The control room envelope intact.

APPLICABILITY: ALL MODES and during movement of irradiated fuel assemblies and during CORE ALTERATIONS.

ACTION: MODES 1, 2, 3, and 4

- a. With one filtration train inoperable, align CREACS for single filtration train operation within 4 hours, and restore the inoperable filtration train to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With CREACS aligned for single filtration train operation and with one of the two remaining fans or associated outlet damper inoperable, restore the inoperable fan or damper 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.
- c. With the Control Room Envelope inoperable, restore the Control Room Envelope to OPERABLE status within 4 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With one or both series isolation damper(s) on a normal Control Area Air Conditioning System (CAACS) outside air intake or exhaust duct inoperable, close the affected duct within 4 hours by use of at least one isolation damper secured in the closed position or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. (Refer to ACTION 2 of Table 3.3-6.)

* The CREACS is a shared system with Salem Unit 2

25

PLANT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

- e. With one or both isolation damper(s) on an outside emergency air conditioning air intake duct inoperable, close the affected duct within 4 hours by use of at least one isolation damper secured in the closed position and restore the damper(s) to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- f. With any isolation damper between the normal CAACS and the CREACS inoperable, secure the damper in the closed position within 4 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6 or during movement of irradiated fuel assemblies and during CORE ALTERATIONS.

- a. With one filtration train inoperable, align CREACS for single filtration train operation within 4 hours, or suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.
- b. With CREACS aligned for single filtration train operation with one of the two remaining fans or associated outlet damper inoperable, restore the fan or damper to OPERABLE status within 72 hours, or suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.
- c. With two filtration trains inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.
- d. With the Control Room Envelope inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.
- e. With one or both series isolation damper(s) on a normal CAACS outside air intake or exhaust duct inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies until the affected duct is closed by use of at least one isolation damper secured in the closed position. (Refer to ACTION ~~Y~~ of Table 3.3-6.)
- f. With one or both series isolation damper(s) on an outside emergency air conditioning air intake duct inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies until the affected duct is closed by use of at least one isolation damper secured in the closed position. To resume CORE ALTERATIONS or movement of irradiated fuel assemblies, at least one emergency air intake duct must be operable on each unit.
- g. With any isolation damper between the CAACS and the CREACS inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies until the damper is closed and secured in the closed position.

POWER DISTRIBUTION LIMITS

3/4.2.2 HEAT FLUX HOT CHANNEL FACTOR - F₀(Z)

LIMITING CONDITION FOR OPERATION

3.2.2 $F_0(z) \leq \frac{F_0^{RTP}}{P} * K(z)$ for $P > 0.5$, and

$F_0(z) \leq \frac{F_0^{RTP}}{0.5} * K(z)$ for $P \leq 0.5$, and

Where F_0^{RTP} = the F_0 limit at RATED THERMAL POWER (RTP) specified in the CORE OPERATING LIMITS REPORT (COLR).

$P = \frac{\text{THERMAL POWER}}{\text{RATED THERMAL POWER}}$, and

$K(z)$ = the normalized $F_0(z)$ as a function of core height as specified in the COLR.

APPLICABILITY: MODE 1

ACTION:

With $F_0(Z)$ exceeding its limit:

- a. Reduce THERMAL POWER at least 1% for each 1% $F_0(Z)$ exceeds the limit within 15 minutes and similarly reduce the Power Range Neutron Flux-High Trip Setpoints within the next 4 hours; POWER OPERATION may proceed for up to a total of 72 hours; subsequent POWER OPERATION may proceed provided the Overpower delta T Trip Setpoints have been reduced at least 1% for each 1% $F_0(Z)$ exceeds the limit. The Overpower delta T Trip Setpoint reduction shall be performed with the reactor in at least HOT STANDBY.
- b. Identify and correct the cause of the out of limit condition prior to increasing THERMAL POWER above the reduced limit required by a. above; THERMAL POWER may then be increased provided $F_0(Z)$ is demonstrated through a core power distribution measurement to be within its limit.

TABLE 3.3-6
RADIATION MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ALARM/TRIP SETPOINT	MEASUREMENT RANGE	ACTION
1. AREA MONITORS					
a. Fuel Storage Area	1	*	≤15 mR/hr	10 ⁻¹ -10 ⁴ mR/hr	23
b. Containment Area	2	1,2,3&4	≤10 ³ R/hr	1-10 ⁷ R/hr	26
2. PROCESS MONITORS					
a. Containment					
1) Gaseous Activity					
a) Purge & Pressure - Vacuum Relief Isolation	1#	6 and 1,2,3,4&5	Set at less than or equal to 50% of the 10CFR20 concentration limits for gaseous effluents released to unrestricted areas. per ODCM Control 3.3.3.9	10 ¹ -10 ⁶ cpm	26
b) RCS Leakage Detection	1	1,2,3&4	N/A	10 ¹ -10 ⁶ cpm	24
2) Air Particulate Activity					
a) Purge & Pressure - Vacuum Relief Isolation	1	6	≤2x background	10 ¹ -10 ⁶ cpm	25
b) RCS Leakage Detection	1	1,2,3&4	N/A	10 ¹ -10 ⁶ cpm	24

* With fuel in the storage pool or building.

The plant vent noble gas monitor may also function in this capacity when the purge/pressure-vacuum relief isolation valves are open.

PLANT SYSTEMS

3/4.7.6 CONTROL ROOM EMERGENCY AIR CONDITIONING SYSTEM

LIMITING CONDITION FOR OPERATION
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3.7.6 The common control room emergency air conditioning system (CREACS)* shall be OPERABLE with:

- a. Two independent air conditioning filtration trains (one from each unit) consisting of:
 - 1. Two fans and associated outlet dampers,
 - 2. One cooling coil,
 - 3. One charcoal adsorber and HEPA filter array,
 - 4. Return air isolation damper.
- b. All other automatic dampers required for operation in the pressurization or recirculation modes.
- c. The control room envelope intact.

APPLICABILITY: ALL MODES and during movement of irradiated fuel assemblies and during CORE ALTERATIONS.

ACTION: MODES 1, 2, 3, and 4

- a. With one filtration train inoperable, align CREACS for single filtration train operation within 4 hours, and restore the inoperable filtration train to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With CREACS aligned for single filtration train operation and with one of the two remaining fans or associated outlet damper inoperable, restore the inoperable fan or damper 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.
- c. With the Control Room Envelope inoperable, restore the Control Room Envelope to OPERABLE status within 4 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With one or both series isolation damper(s) on a normal Control Area Air Conditioning System (CAACS) outside air intake or exhaust duct inoperable, close the affected duct within 4 hours by use of at least one isolation damper secured in the closed position or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. (Refer to ACTION 2 of Table 3.3-6.)

*The CREACS is a shared system with Salem Unit 1

28

PLANT SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

- e. With one or both isolation damper(s) on an outside emergency air conditioning air intake duct inoperable, close the affected duct within 4 hours by use of at least one isolation damper secured in the closed position and restore the damper(s) to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- f. With any isolation damper between the normal CAACS and the CREACS inoperable, secure the damper in the closed position within 4 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

MODES 5 and 6 or during movement of irradiated fuel assemblies and during CORE ALTERATIONS.

- a. With one filtration train inoperable, align CREACS for single filtration train operation within 4 hours, or suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.
- b. With CREACS aligned for single filtration train operation with one of the two remaining fans or associated outlet damper inoperable, restore the fan or damper to OPERABLE status within 72 hours, or suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.
- c. With two filtration trains inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.
- d. With the Control Room Envelope inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies.
- e. With one or both series isolation damper(s) on a normal CAACS outside air intake or exhaust duct inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies until the affected duct is closed by use of at least one isolation damper secured in the closed position. (Refer to ACTION ~~PLAN~~ ²⁸ of Table 3.3-6.)
- f. With one or both series isolation damper(s) on an outside emergency air conditioning air intake duct inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies until the affected duct is closed by use of at least one isolation damper secured in the closed position. To resume CORE ALTERATIONS or movement of irradiated fuel assemblies, at least one emergency air intake duct must be operable on each unit.
- g. With any isolation damper between the CAACS and the CREACS inoperable, immediately suspend CORE ALTERATIONS and movement of irradiated fuel assemblies until the damper is closed and secured in the closed position.