

JAN 11 2005



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LCR S04-10

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

**REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS TO ELIMINATE
REQUIREMENTS TO PROVIDE MONTHLY OPERATING REPORTS AND
OCCUPATIONAL RADIATION EXPOSURE REPORTS USING THE
CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354
FACILITY OPERATING LICENSE NO. NPF-57
SALEM GENERATING STATION - UNIT 1 AND UNIT 2
DOCKET NO. 50-272 AND 50-311
FACILITY OPERATING LICENSE NO. DPR-70 AND DPR-75**

In accordance with the provisions of 10 CFR 50.90, PSEG Nuclear, LLC (PSEG) hereby transmits a request for amendment of the Technical Specifications (TS) for Hope Creek Generating Station and Salem Generating Station Unit 1 and Unit 2.

The proposed amendment would delete the TS requirements to submit monthly operating reports and occupational radiation exposure reports. The change is consistent with NRC approved Revision 1 to industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004, as part of the consolidated line item improvement process (CLIP).

Attachment 1 provides a description of the proposed change and confirmation of applicability. Attachment 2 provides the existing TS pages marked-up to show the proposed change.

PSEG does not have specific schedule needs for this proposed change and requests approval of the proposed license amendment in accordance with the

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normal NRC review schedule for this type of request. PSEG requests implementation within 60 days of receipt of the approved amendment.

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated New Jersey State Official.

Should you have any questions regarding this request, please contact Mr. Robin Ritzman at (856) 339-1445.

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

Sincerely,

Executed on 11 Jan 2005
(Date)


Michael H. Brothers
Vice President – Operations

- Attachments:
1. Description and Assessment
 2. Proposed Technical Specification Changes

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**HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NO. NPF-57
DOCKET NO. 50-354**

**SALEM GENERATING STATION – UNIT 1 AND UNIT 2
FACILITY OPERATING LICENSE NO. DPR-70 AND DPR-75
DOCKET NO. 50-272 AND 50-311**

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

The proposed License amendment deletes the requirements in Hope Creek Generating Station and Salem Generating Station Technical Specification (TS) 6.9.1.5.a for an annual report on occupational radiation exposures, and Salem Generating Station TS 6.9.1.6 and Hope Creek Generating Station TS 6.9.1.8 for a monthly report of operating statistics and shutdown experience.

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1.¹ The availability of this TS improvement was announced in the Federal Register on June 23, 2004, as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed TS changes include:

Hope Creek TS 6.9.1.5.a	Occupational Radiation Exposure Report	Deleted
Hope Creek TS 6.9.1.8	Monthly Operating Reports	Deleted
Salem TS 6.9.1.5.a	Occupational Radiation Exposure Report	Deleted
Salem TS 6.9.1.6	Monthly Operating Reports	Deleted

¹ Hope Creek Generating Station and Salem Generating Station Unit 1 and Unit 2 have not adopted Standard Technical Specifications (STS); therefore, the requirements of STS 5.6.1, "Occupational Radiation Exposure Report," and STS 5.6.4, "Monthly Operating Reports," referenced in TSTF-369, are actually addressed by Hope Creek Generating Station and Salem Generating Station TS 6.9.1.5.a and Salem Generating Station TS 6.9.1.6 and Hope Creek Generating Station TS 6.6.1.8. Regulatory Issue Summary 2000-06, "CLIIP for Adopting STS Changes for Power Reactors", permits adoption of CLIIP changes for Licensees that have not converted to STS, but have determined that the TSTF is applicable to their facility.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004, (69 FR 35067) and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004, (69 FR 35067) and TSTF-369.

5.0 TECHNICAL ANALYSIS

PSEG Nuclear, LLC (PSEG) has reviewed the SE published on June 23, 2004 (69 FR 35067) as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE and the supporting information provided to support TSTF-369. PSEG has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to Hope Creek Generating Station and Salem Generating Station Unit 1 and Unit 2 and justify this amendment for the incorporation of the changes to the Hope Creek Generating Station and Salem Generating Station Unit 1 and Unit 2 TS.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004, (69 FR 35067) and TSTF-369.

6.1 Verification and Commitments

As discussed in the model SE published in the Federal Register June 23, 2004, (69 FR 35067) for this TS improvement, PSEG is making the following regulatory commitments:

1. PSEG is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).

2. The southern part of Artificial Island on the east bank of the Delaware River in Lower Alloways Creek Township, Salem County, New Jersey, has different reactor types.

For sites with different reactor types: PSEG is making a regulatory commitment to provide information to the NRC annually (e.g., with the annual submittal in accordance with 10 CFR 20.2206) to support the apportionment of station doses to each type of reactor. The data will provide the summary distribution of annual whole body doses as presented in Appendix B of NUREG-0713 for each reactor type.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

PSEG has reviewed the proposed no significant hazards consideration determination published on June 23, 2004, (69 FR 35067) as part of the CLIIP. PSEG has concluded that the proposed determination presented in the notice is applicable to Hope Creek Generating Station and Salem Generating Station Unit 1 and Unit 2 and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

PSEG has reviewed the environmental evaluation included in the model SE published on June 23, 2004, (69 FR 35067) as part of the CLIIP. PSEG has concluded that the staff's findings presented in that evaluation are applicable to Hope Creek Generating Station and Salem Generating Station Unit 1 and Unit 2 and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. PSEG is not proposing any substantive variations or deviations from the TS changes described in TSTF-369 and the limited portion of TSTF-258 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067). Note that Hope Creek Generating Station and Salem Generating Station Unit 1 and Unit 2 have not converted to STS; therefore, there are some administrative differences in TS numbering (See footnote 1).

10.0 REFERENCES

1. Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process, published June 23, 2004 (69 FR 35067).

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UPS)

Hope Creek Affected Page List

Index Page xxiv

The following Technical Specifications for Hope Creek Generating Station Facility Operating License NPF-57 are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
TS 6.9.1.5.a	6-17, 6-18
TS 6.9.1.8	6-20

The following Technical Specifications for Salem Generating Station Unit 1 and Unit 2, Facility Operating License DPR-70 and DPR-75, are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
TS 6.9.1.5.a	6-21
TS 6.9.1.6	6-21

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6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the USNRC Administrator, Region 1, unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

6.9.1.2 The startup report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the startup report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial operation) supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS*

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year.

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions** (e.g., reactor operations and surveillance,

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*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

**This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

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inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or self reading dosimeter measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions; and

- b. Documentation of all challenges to main steamline safety/relief valves.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.6 The Annual Radiological Environmental Operating report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

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MONTHLY OPERATING REPORTS

6.9.1.8 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, with a copy to the USNRC Administrator, Region 1, no later than the 15th of each month following the calendar month covered by the report.

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CORE OPERATING LIMITS REPORT

6.9.1.9 Core operating limits shall be established and documented in the PSEG Nuclear LLC generated CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following Technical Specifications:

- 3/4.2.1 AVERAGE PLANAR LINEAR HEAT GENERATION RATE
- 3/4.2.3 MINIMUM CRITICAL POWER RATIO
- 3/4.2.4 LINEAR HEAT GENERATION RATE

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6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation* on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, thermoluminescent dosimeter (TLD), or self reading dosimeter measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- b. The complete results of steam generator tube inservice inspections performed during the report period (reference Specification 4.4.5.5.b).
- c. The results of any specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

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MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555 with a copy to the USNRC Administrator, Region I, no later than the 15th of each month following the calendar month covered by the report.

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* This tabulation supplements the requirements of section 20.407 of 10 CFR Part 20.

ADMINISTRATIVE CONTROLS

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation* on an annual basis of the number of station, utility and other personnel, (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, thermoluminescent dosimeter (TLD), or self reading dosimeter measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- b. The complete results of steam generator tube inservice inspections performed during the report period (reference Specification 4.4.5.5.b).
- c. The results of any specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

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MONTHLY OPERATING REPORT

6.9.1.6 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555 with a copy to the USNRC Administrator, Region I, no later than the 15th of each month following the calendar month covered by the report.

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* This tabulation supplements the requirements of section 20.407 of 10 CFR Part 20.