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10 CFR 50.90

LR-N17-0118

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

Salem Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

Subject: Response to Request for Additional Information (RAI), Re: Accident Monitoring Instrumentation Technical Specifications (CACs MF8859 and MF8860)

References:

1. NRC email to PSEG, "Request for Additional Information – Salem Units 1 and 2 – Accident Monitoring Instrumentation License Amendment Request (CAC No. MF8859 & 60)," dated July 18, 2017 (ADAMS Accession No. ML17199A112)
2. PSEG letter to NRC, "License Amendment Request to Amend the Accident Monitoring Instrumentation Technical Specifications," dated November 17, 2016 (ADAMS Accession No. ML16323A279)

In Reference 1, the Nuclear Regulatory Commission (NRC) requested PSEG Nuclear LLC (PSEG) to provide additional information in order to complete the review of the license amendment request (LAR) to revise Technical Specification (TS) requirements regarding accident monitoring instrumentation. Attachment 1 provides a response to the request for additional information.

Revisions to four TS markup pages are provided in Attachment 2. The revisions consist of typographical changes, and formatting changes consistent with NUREG-1431, Revision 4, "Standard Technical Specifications, Westinghouse Plants."

PSEG has determined that the information provided in this submittal does not alter the conclusions reached in the 10 CFR 50.92 no significant hazards determination previously submitted. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

In addition, PSEG requested, in Reference 2, that once approved, the amendment will be implemented within 60 days from the date of issuance. We are requesting to extend the implementation to 90 days from the date of issuance.

There are no regulatory commitments contained in this letter.


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Should you have any questions regarding this submittal, please contact Ms. Tanya Timberman at 856-339-1426.

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

Executed on 8/7/17
(Date)

Sincerely,



Charles V. McFeaters
Site Vice President
Salem Generating Station

Attachments:

1. Response to Request for Additional Information
2. Supplemental Information Needed for Review of the License Amendment Request to Amend the Accident Monitoring Instrumentation Technical Specifications

cc: Mr. D. Dorman, Administrator, Region I, NRC
Mr. R. Ennis, Project Manager, NRC
NRC Senior Resident Inspector, Hope Creek
Mr. P. Mulligan, Chief, NJBNE
Hope Creek Commitment Tracking Coordinator
Corporate Commitment Tracking Coordinator

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Attachment 1

Response to Request for Additional Information

**Request for Additional Information (RAI)
Regarding Proposed License Amendment
Accident Monitoring Instrumentation Technical Specifications
Salem Nuclear Generating Station, Unit Nos. 1 and 2
Docket Nos. 50-272 and 50-311**

By letter dated November 17, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16323A279), PSEG Nuclear LLC (PSEG, the licensee) submitted a license amendment request (LAR) for Salem Nuclear Generating Station (Salem), Unit Nos. 1 and 2. The amendments would revise Technical Specification (TS) requirements regarding accident monitoring instrumentation. Specifically, the amendments would modify the list of instruments required to be operable based on implementation of Regulatory Guide 1.97, Revision 2, dated December 1980, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident" (ADAMS Accession No. ML06075052). In addition, allowed outage times (AOTs) and required actions for inoperable accident monitoring instrumentation channels would be revised to be consistent with NUREG-1431, Revision 4, "Standard Technical Specifications – Westinghouse Plants" (ADAMS Accession Nos. ML12100A222 and ML12100A228).

The NRC staff is reviewing your submittal and has determined that additional information is needed to complete its review. The specific information requested is addressed below.

Division of Operating Reactor Licensing (DORL)

Reviewer: Rick Ennis

RAI-DORL-1

On July 22, 1993 (58 FR 39132), the Commission published a "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (Final Policy Statement) which discussed the criteria to determine which items are required to be included in the TSs as Limiting Conditions for Operation (LCOs). The criteria were subsequently incorporated into the regulations by an amendment to 10 CFR 50.36 (60 FR 36953, July 19, 1995). Specifically, 10 CFR 50.36(c)(2)(ii) requires that a TS LCO be established for each item meeting one or more of the following criteria:

- Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
- Criterion 2: A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

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Attachment 1

- Criterion 3: A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- Criterion 4: A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

As discussed in the *Federal Register* notice for the final rule dated July 19, 1995 (60 FR 36955):

LCOs that do not meet any of the criteria, and their associated actions and surveillance requirements, may be proposed for relocation from the technical specifications to licensee-controlled documents, such as the FSAR [Final Safety Analysis Report]. The criteria may be applied to either standard or custom technical specifications.

As discussed in the Final Policy Statement (58 FR 39138):

When licensees submit amendment requests based on this Policy Statement, they should identify the location of and controls for the technical and administrative requirements of the relocated requirements. The NRC staff will carefully review these submittals to ensure the accountability and the acceptability of controls for each relocated requirement. Many of the requirements will be relocated to the FSAR and will be enforceable through 10 CFR 50.59. Other requirements will be relocated to more appropriate documents (e.g., Security Plan, QA Plan) and controlled by the applicable regulatory requirements. The adequacy of controls for relocated requirements which do not fit in the above categories will be reviewed and approved by the NRC staff on a case-by-case basis to determine, among other things, whether an enforceable control method will need to be established.

Salem TS Limiting Condition for Operation (LCO) 3.3.3.7 requires that the accident monitoring instrumentation channels shown in TS Table 3.3-11 be operable in Modes 1, 2 and 3. The proposed amendments would delete several of the accident monitoring instrumentation channels listed in the Table. However, the LAR does not identify the location of and controls for the technical and administrative requirements of the relocated requirements. Consistent with the expectations stated in the Final Policy Statement, please identify the specific licensee-controlled document for the proposed relocated requirements (e.g., FSAR, Technical Requirements Manual). In addition, specify the regulatory controls that will pertain to the relocated requirements (e.g., 10 CFR 50.59).

PSEG Response to RAI-DORL-1

The specific licensee-controlled document for the proposed relocated requirements is the Salem Updated Final Safety Analysis Report (UFSAR). The regulatory control that will pertain to the relocated requirements is the 10 CFR 50.59 process.

Attachment 2

Supplemental Information Needed for Review of the License Amendment Request to Amend the Accident Monitoring Instrumentation Technical Specifications

Revised Mark-up of Proposed Technical Specification Pages

The following are revised Technical Specifications pages for Renewed Facility Operating License DPR-70:

<u>Technical Specification</u>	<u>Page</u>
3.3.3.7, Accident Monitoring Instrumentation	3/4 3-53
Table 3.3-11, Accident Monitoring Instrumentation	3/4 3-56

The following are revised Technical Specifications pages for Renewed Facility Operating License DPR-75:

<u>Technical Specification</u>	<u>Page</u>
3.3.3.7, Accident Monitoring Instrumentation	3/4 3-50
Table 3.3-11, Accident Monitoring Instrumentation	3/4 3-51b

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.7 The accident monitoring instrumentation channels shown in Table 3.3-11 shall be operable.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:



- a. As shown in Table 3.3-11.

SURVEILLANCE REQUIREMENTS

4.3.3.7 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies specified in the Surveillance Frequency Control Program unless otherwise noted in Table 4.3-11.

-----NOTE-----

Separate Condition entry is allowed for each Function.

TABLE 3.3-11 (continued)

HOT STANDBY within the next 6 hours and in

TABLE NOTATION

submit a special report in accordance with Specification 6.9.4

ACTION 1 With the number of OPERABLE accident monitoring channels less than the Required Number of Channels shown in Table 3.3-11, restore the inoperable channel(s) to OPERABLE status within 7 days, or be in HOT SHUTDOWN within the next 12 hours.

30

ACTION 2 With the number of OPERABLE accident monitoring channels less than the MINIMUM Number of Channels shown in Table 3.3-11, restore the inoperable channel(s) to OPERABLE status within 48 hours or be in HOT SHUTDOWN within the next 12 hours.

7 days

ACTION 3 deleted

following 6

ACTION 4 With the number of OPERABLE channels one less than the Required Number of Channels shown in Table 3.3-11, operation may proceed provided that an OPERABLE Steam Generator Wide Range Level channel is available as an alternate means of indication for the Steam Generator with no OPERABLE Auxiliary Feedwater Flow Rate channel.

ACTION 5 deleted

; otherwise, restore the inoperable channel to OPERABLE status within 30 days, or submit a special report in accordance with Specification 6.9.4.

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APPLICABILITY: MODES 1, 2, and 3.

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TABLE 3.3-11 (continued)

TABLE NOTATION

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7 days

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following 6

ACTION 4 With the number of OPERABLE channels one less than the Required Number of Channels shown in Table 3.3-11, operations may proceed provided that an OPERABLE Steam Generator Wide Range Level channel is available as an alternate means of indication for the Steam Generator with no OPERABLE Auxiliary Feedwater Flow Rate Channel.

ACTION 5 deleted

; otherwise, restore the inoperable channel to OPERABLE status within 30 days, or submit a special report in accordance with Specification 6.9.4.