

Public Service Electric and Gas Company 80 Park Place Newark, N.J. 07101 Phone 201/430-7000

February 13, 1979

Director of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Attention:

Mr. Olan D. Parr, Chief

Light Water Reactors Branch 3 Division of Project Management

Gentlemen:

REQUEST FOR DEFERMENT INCOMPLETE ITEMS NO. 2 UNIT SALEM NUCLEAR GENERATING STATION DOCKET NO. 50-311

In accordance with the requirements of lOCFR50.55(d) of the Commission's regulations, PSE&G hereby transmits a listing of incomplete preoperational tests and other items for which deferment until after core loading is indicated.

A review of our FSAR commitments has identified a small number of balance of plant or safety related items that will not be completed prior to core load in early to mid-March 1979. We have evaluated these items and have determined that the incomplete status of these items at the time of core loading will have no adverse effect on the health and safety of the general public or station personnel.

Attachments 1 and 2 identify those items which will be completed prior to and after initial criticality, respectively. The lists include our safety evaluation of the deferment of completion of the items. We have concluded that the items identified in the attachments do not involve an unreviewed safety question and will have no effect on the safe operation and reliability of the plant.



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We therefore, request that the Operating License for the No. 2 Unit be conditioned to reflect the completion of the items identified in the attachments as indicated.

Very truly yours,

R. L. Mittl

General Manager -

Licensing and Environment Engineering and Construction

- Waste Disposal
 The following tests will not be
 completed until after core load.
 - 16.1 Liquid Waste Receipt and Storage
 - 16.4 Resin Removal System
 - 16.6 Gaseous Waste Processing
- 2. Retest required as a result of Hot Functional Test:

The #21 Reactor Coolant leakoff flow alarm will not be tested until after core load.

3. Valve 24MS15 (Main Steam Safety) valve was gagged during HFT.

SAFETY EVALUATION

These systems are not required for the safe shutdown of the plant, and no radioactive waste is generated until after initial criticality. Functional testing of these systems can therefore be deferred until after core load.

Reliable operation of the #21 Reactor Coolant Pump and its associated leakoff flow were verified during HFT. However, the low flow alarm for the leakoff flow rate was not tested. Since flow rates were visually verified, functional testing of the flow alarm after core load, but prior to initial criticality, will not impair the safe operation or reliability of the system.

The valve will be repaired prior to core load. Valve testing will require Main Steam System partial pressure; the remaining portion of system pressure will be simulated by mechanical assist. Therefore, the valve will not be untested before the system reaches its maximum pressure. This procedure, coupled with the other safety valves in the line, adequately ensures overpressurization protection. This will not detrimentally affect system function or plant safety.

 System: Radiation Monitoring The testing of the radiation monitoring system will not be complete.

SAFETY EVALUATION

The Radiation Monitoring System can be divided into three distinct areas, (1) basic monitoring channels with control room display information, (2) portable monitor capability and (3) expanded control room/health physics display capability. The first portion of the system is truly concerned with plant radiation monitoring needs while the remaining two portions are concerned with plant betterment and operator assistance but are not required for safe reliable operation of the plant.

All process monitors required by the Technical Specifications for fuel loading will be operational prior to initial fuel loading.

No radioactivity is present in the process systems until after initial criticality is achieved. Therefore, completion of the testing of the basic monitoring channels and associated equipment after core load but prior to initial criticality will not affect the safe and reliable operation of the plant. All monitors will be installed and tested by initial criticality except:

Spent Fuel Pit Filter
Refueling Water Purification Filter
Ion Exchange Filter
Steam Generator Blowdown Filter Discharge
Evaporator/Feed Preheater Condensate
Steam Generator Blowdown Filter
Condensate Filter
21-24 Waste Gas Decay Tanks

The availability of these specific monitors can be postponed beyond initial criticality for the following reasons:

- 2R28 and 2R30 will not be needed until immediately prior to the first refueling
- 2R36 services the steam supply to the waste evaporator. This will not be needed until the waste evaporator is placed in service.

SAFETY EVALUATION

1. Radiation Monitoring
 (Continued)

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- 2R42A-D are for gross indication of high radiation levels in the gas decay tanks. This will be checked using portable monitors.
- The remaining monitors are only for indication of high concentrations in filters. This will be checked using portable monitors. Additional verification will be made prior to changing any filters.

Computer software and display functions will be available by Initial Criticality except:

- Active/Deactivate circuits from Control Room
- Enable Alarms: alarm disconnect
- Alarm Output: 8 hour alarm status
- Several miscellaneous functions for station personnel aid or convenience

The above listed portions can be installed and tested after initial criticality without any affect on plant operations or safety.

- 2. System: Condenser Air Removal and Priming
 The operational testing of the crosstie with Unit 1 will not be completed.
- 3. System: Circulating Water The operational tests of circulators 21B, 22B and 23A.

The Condenser Air Removal System is not safety related. The lack of testing of the Unit 1 crosstie will not affect the safe operation of the plant. This system is installed for operational flexibility and serves no safety function.

The operation of the Circulating Water System is not a safety related function. Three circulators have already been tested and accepted.

SAFETY EVALUATION

- 4. System: Emergency Diesel Generator The 24 hour run and the 23 consecutive starts tests will not be completed until the completion of the zero power physics tests.
- Diesel testing and demonstration of increased reliability are now underway. All testing will be completed prior to Core Load except the 24 hour run and the 23 consecutive starts per Diesel. These tests, as delineated in Regulatory Guide 1.108, will be completed prior to proceeding beyond the Zero Power Physics Test Program.

These diesels have demonstrated their reliability in previous component and system tests. These units are not prototypes, and are identical to those used in No. 1 Unit, which have shown a high degree of reliability. Consequently, completion of these tests prior to departure from the Zero Power Physics Test Program will have no effect upon the safe operation of Salem No. 2 Unit.

- 5. SUP 50.20, Initial Synchronization of Generator, will not be performed until after Initial Criticality
- The Generator was run at 1800 RPM during Hot Functional Testing but was not synchronized. Synchronization after Initial Criticality will not affect the safe operation or reliability of the system.
- 6. Waste Disposal Liquid
 SUP 16.2 Liquid Waste
 Processing
 Waste Evaporator will not be
 completed until after Initial
 Criticality

The operation of Salem Unit No. 2 without an available Liquid Waste Evaporator at the beginning of plant life will have no affect upon the safe operation of the plant for the following reasons:

1. The radioactivity levels in the plant for the first several months of plant life is very low. The amount of radioactive liquid waste that would be released to the environment would be only a small fraction of the allowable limits. Operation of the waste evaporator during initial periods of operation would not be required to meet Technical Specification limits on radioactive releases and would not result in any radioactive releases when compared to allowable release limits.

SAFETY EVALUATION

6. Waste Disposal (Continued)

7. System: Control Air
Final checkout of #2 Emergency
Control Air Compressor using
permanent No. 2 Unit power
supply.

Compressor is now connected to Unit 1 vital power.

2. The Unit 2 evaporator will be operational prior to entering the first refueling outage. Waste evaporation requirements prior to that time can be fulfilled by the Unit 1 waste processing system via the crosstie between units.

The Control Air System as installed insures sufficient redundancy during design basis events. Changeover to Unit 2 power supply can be deferred without jeopardizing plant safety, since the compressor is presently connected to the Unit 1 vital power supply. The changeover to Unit 2 vital power supply will be made prior to June 1, 1979.