PSE&G

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Ref. LCR 81-01

February 17, 1981

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

Attention: Mr. Steven Varga, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Gentlemen:

REQUEST FOR AMENDMENT
FACILITY OPERATING LICENSES DPR-70
UNIT NO. 1
SALEM GENERATING STATION
DOCKET NOS. 50-272

In accordance with the Atomic Energy Act of 1954, as amended and the regulations thereunder, we hereby transmit copies of our request for amendment of the Facility Operating License DPR-70 for Salem Generating Station, Unit No. 1

This request consists of proposed changes to the Safety Technical Specifications (Appendix A) involving sections pertaining to TMI-2 Lessons Learned Category "A" items. The changes reflect our response to your Mr. Darrell G. Eisenhut's letter to all Pressurized Water Reactor Licensees, dated July 2, 1980.

There are several areas of change that are not directly in conformance with the model specifications that accompanied the July 2, 1980 letter. At the request of your Mr. William Ross, we are attaching a list of those changes that are in variation from the model specifications and our justification for the differences.

The changes have been determined by the staff as being in the public interest and exempt from fee as defined by 10CFR170.11.

This submittal includes three (3) signed originals and forty (40) copies.

Very truly yours,

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R. A. Uderitz
General Manager -
Nuclear Production

Encl.

DIFFERENCES BETWEEN
PROPOSED SALEM STATION TECHNICAL SPECIFICATIONS
AND
LL/STS MODEL T.S.

The following changes suggested in the LL/STS Model Technical Specifications have been found difficult to incorporate as written. The corresponding proposed Salem Technical Specifications were prepared to satisfy the intent, where possible, of the model LL/STS as justified below:

ENGINEERING SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

FUNCTIONAL UNIT #6, AUXILIARY FEEDWATER

Tables 3.3-3, 3.3-4, and 4.3.02... Item 'e'

Trip of Main Feedwater Pumps start Motor Driven Auxiliary Feedwater Pumps only. This item is not included in Final Safety Analysis Report as part of ESF Actuation System and is not presently designed to comply with "Minimum Channels to Trip" for those conditions where one Main Feed Pump is out of service for repair. The ACTION Statement would prevent half-load operation using only the operational Main Feedwater Pump. We are investigating design/procedure changes which could resolve this problem; at which point, a License Change would be proposed to include this item.

ACCIDENT MONITORING INSTRUMENTATION

3.3.3.6, Tables 3.3-10 and 4.3-7

There are, due to "Total Number of Channels" differences between the Salem plant and several Model LL/STS instruments for which the ACTION Statements become unreasonably restrictive when applied without regard for other means for determining the measured parameters. The Tables and ACTION Statements sections have been modified to reflect a reasonable level of ACTION for inoperable instruments which are adequately backed up by other means. These instruments are Boric Acid Storage Tanks' Levels, Auxiliary Feedwater Flows, and RCS Subcooling Monitor; the ACTION Statements proposed for these items provide qualifying conditions for continued operation. Additionally, Salem's PORV and Safety Valve position indicators have only one channel for each valve... both "Minimum Channels Operable" and Required Number of Channels" as specified in the Model Tech. Specs. would require a plant shutdown upon the loss of one limit switch since the valves are inaccessible during power operation. There are alternate methods of determining the status of the valves using valve tailpipe temperatures, Pressure Relief Tank level/temperature/pressure, and Pressurizer High Pressure alarm. These alternate means are all indicated/alarmed in the control room and are reflected in plant operating procedures.