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Public Service Electric and Gas Company P.O. Box E Hancocks Bridge, New Jersey 08038

Salem Generating Station

February 22, 1983

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Mr. R. C. Haynes
Regional Administrator
USNRC
Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Haynes

LICENSE NO. DPR-70
DOCKET NO. 50-272
REPORTING OF OCCURRENCES INVOLVING ROUTINE ENTRY INTO TECHNICAL
SPECIFICATION ACTION STATEMENTS DURING EXPECTED PLANT TRANSIENTS

Expected plant transients routinely result in entry into various Technical Specification action statements when safety systems perform their design functions. In the past, such incidents have been documented as reportable occurrences and have been reported as operation in a degraded mode in accordance with Technical Specification 6.9.1.9b.

These events do not constitute operation in a degraded mode, however, since entry into the action statement reflects safety system out-of-specification conditions which are assumed in the accident analyses of the events involved. This situation is reflected in the Technical Specification bases, where the limits of the limiting conditions for operation are determined by the capability of performing the design function of the safety system involved.

In an attempt to reduce the number of normal occurrences which are reported, and to more accurately reflect Technical Specification reporting requirements, this type of event will no longer be reported. Such occurrences will continue to be documented in accordance with existing Administrative Procedures.

Attached is a list of some specific action statements which typically fall in this category; included are the details of more common events which are not reportable. In general, the referenced conditions involve safety systems functioning as analyzed in the FSAR; following the occurrence, the systems are restored to a normal status in accordance with approved procedures.

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The examples do not provide an inclusive listing of such events; other occurrences may arise which are of this nature, and which will be identified on an individual basis. Proposed changes in reporting these events were reviewed by the Resident NRC Inspector prior to implementation. His comments were utilized in defining the specific type of incidents involved, and in developing the list of examples and related analyses.

Sincerely yours,

H. J. Midura 

H. J. Midura
General Manager -
Salem Operations

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attachment

EXAMPLES OF NON-REPORTABLE OCCURRENCES INVOLVING ENTRY INTO ACTION STATEMENTS DURING EXPECTED PLANT TRANSIENTS

1. 3.1.2.8 (3.1.2.6) Borated Water Sources

In preparation for placing the unit in cold shutdown, it is required to borate the Reactor Coolant System (RCS). In some instances, particularly late in core life when the initial boron concentration is very low, this will require a considerable amount of boric acid. As a result, the level in the Boric Acid Storage Tanks (BATs) may be reduced below the minimum required by the Technical Specifications for operation in Modes 1 through 4. The specification limit on the BATs level is based on borating the RCS to cold shutdown conditions.

2. 3.1.2.8 (3.1.2.6), 3.5.5 Refueling Water Storage Tank (RWST)

On any Safety Injection (SI) System actuation where a significant amount of water is injected into the RCS by the Emergency Core Cooling System (ECCS), the RWST level will be decreased below the minimum required by the Technical Specifications for hot operation. The minimum contained volume of the tank is based on providing sufficient borated water to allow recirculation cooling of the core and to maintain subcriticality through cooldown.

3. 3.2.1 Axial Flux Distribution (AFD)

On any large, rapid load reduction, with the Rod Control System in the automatic mode, the control rods will drive in to maintain programmed T_{avg} . This will result in a rapid flux shift towards the bottom of the core, most likely causing the AFD to be outside the prescribed band of +6%, -9% of the target value. Limits on AFD insure that the core axial peaking factors envelope is not exceeded during normal operation or in the event of xenon redistribution following power changes.

4. 3.5.1 ECCS Accumulator Level and Pressure

On any SI actuation where the RCS pressure decreases below 600 psig, the ECCS accumulators will inject their contained volumes into the RCS cold legs. This will result in the accumulators being below the minimum level and pressure required by the Technical Specifications. The contained volume and pressure specifications are based on the capability to inject sufficient borated water into the core to provide initial cooling during a loss of coolant from the RCS.

5. 3.5.4.1 Boron Injection Tank (BIT) Concentration and Level

On any safety injection actuation, the BIT is isolated from its recirculation path to the BATs. The BIT contents are flushed into the RCS cold legs by water pumped from the RWST by the centrifugal charging pumps. The BIT boron concentration is reduced to the RWST concentration of 2000 ppm, less than the 20,100 ppm required by the Technical Specifications. Isolation of the BIT recirculation path removes the means of verifying the tank contains the specification minimum of 900 gal. The concentration and contained volume requirements are based on counteracting positive reactivity increases associated with RCS depressurization and cooldown.

6. 3.7.1.3 Auxiliary Feedwater Storage Tank Level (AFST)

On any reactor trip from power operation, the auxiliary feedwater pumps will start automatically and feed the steam generators. This will reduce the AFST level at approximately 1760 gpm and will shortly result in the tank being below the Technical Specification limit of 200,000 gal. The minimum allowable contained volume of the AFST is based on providing sufficient water to the steam generators to maintain the unit in hot standby for a minimum of 8 hours.

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