Ref: LCR 79-01 (Rev. 1)
LCR 81-19 (Rev. 1)

PROPOSED CHANGES
TECHNICAL SPECIFICATIONS
UNIT NOS. 1 AND 2

DESCRIPTION OF CHANGE

The proposed changes contained herein revise two previously submitted amendment requests which incorporated the principles of 10 CFR50, Appendix I (LCR 79-01) and involved organizational changes in the Administrative Controls section (LCR-81-19). Additionally, these proposed changes add requirements in the Administrative Controls section concerning overtime limitations, PORV and safety valve challenge/failure reporting and audits.

DISCUSSION OF SPECIFIC REVISIONS

Overall Comment - Previous LCR's 79-01 and 81-19, affect many sections of the Technical Specifications. In the interest of continuity and clarity, both units' Administrative Controls sections have been retyped in their entirety to make them, as much as possible, read the same. The INDEX and DEFINITIONS sections have also been retyped/alphabetized to make them consistent and easier to use.

LCR 79-01 (Rev. 1)

This change revises appropriate sections of the Salem Nuclear Generating Station Technical Specifictions to incorporate the principles of 10CFR 50, Appendix I. This change also deletes "Part 1-Radiological" of the Environmental Technical Specifications and incorporates the salient items of this section into Appendix A of the Salem Operating License. Revised License Change Request 79-01 was developed using the guidance provided in NUREG-0472, Rev. 3, and constitutes the PSE&G version of the standard Radiological Effluent Technical Specification (RETS).

LCR 81-19 (Rev. 1)

6.2.2.f Facility Staff - A statement concerning limitation of overtime has been added in accordance with Generic Letter 82-12.

6.5.3 Safety Review Group - This section has been revised. The SRG is stationed at the site and reports to the General Manager - Nuclear Support as shown in the attached organization chart. In accordance with NUREG-0737 requirements, the SRG is composed

of five dedicated, full-time engineers who perform independent review of plant operations and who advise appropriate station or corporate management on the overall safety of plant operations. The responsibilities of SRG are as follows:

- Review of selected plant operating characteristics, NRC issuances, industry advisories, and other sources of plant design/operating experience data that may indicate areas for improving plant safety.

- Review of selected facility features, equipment and systems.

- Review of selected procedures, and plant activities including maintenance, modifications, operational problems and operational analysis.

- Surveillance of selected plant operations and maintenance activities to provide independent verification that they are performed correctly and that human errors are reduced to as low as reasonably achievable.

6.5.2.8 Audits - Audit frequencies for the Facility Security Plan and Facility Emergency Plan have been changed from 24 months to 12 months to bring them into conformance with 10CFR50 and 10CFR73 requirements.

6.9.1.6 Monthly Operating Report - Added to the routine monthly operating statistics and shutdown experience, will be a report of all challenges to PORV's or safety valves. Failures of the safety valves will be reported under the existing requirements of Section 6.9.1.7 and 6.9.1.8.

REASON FOR CHANGE

LCR-79-01 (Rev. 1)

In keeping with USNRC efforts to standardize all nuclear power plant Technical Specifications, PSE&G has been requested to implement the specifications which they developed. An earlier version of this amendment was originally prepared and submitted to the USNRC on November 26, 1979. As a result of the accident at Three Mile Island, the Nuclear Regulatory Commission has not actively reviewed our proposed Effluent Technical Specifications. The USNRC is now prepared to fully review our submittal

and has requested that we resubmit our proposed changes updated with the guidance provided by the USNRC in Revision 3 to NUREG 0472.

LCR 81-19 (Rev. 1)

As a result of the experience gained in the operation and technical support of the Salem units and our continuing desire to improve the efficiency and effectiveness of these functions, a review was performed of the structure and capability of our nuclear operations and support organizations. Considered in detail in this review were the many requirements and recommendations that have come forth from the post-TMI assessment of the nuclear industry, as well as the specific observations made by both NRC and INPO.

The results of this organizational review led to the integration, within a centralized Nuclear Department, of a major portion of PSE&G's nuclear operations and support functions. To improve the dedication and responsiveness of support personnel to plant operations, this new department has been located directly at the Artificial Island site. This action enhances our state of emergency preparedness, and enables us to more effectively satisfy the requirements of NUREG-0654 (Criteria for Preparation and Evaluation of Radiological Emergency Response Plans).

This revision makes several changes and additions that reflect organizational modifications and/or respond to specific NRC requirements that have developed since our original submittal of this LCR.

SAFETY EVALUATIONS

LCR 79-01 (Rev. 1)

This proposed amendment to the Salem Nuclear Generating Station Technical Specification incorporates the requirements of Appendix I 10CFR50 and clarifies certain aspects of our existing Environmental Technical Specifications. The changes being proposed in this license change request will not result in any reduction in the levels of safety already provided by the existing technical specifications. The changes being proposed will tend to strengthen many of the surveillance requirements for instrumentation and, in general, will tend to increase the margin of safety already provided. The following is a summary of key changes being proposed, along with our evaluation of why margins of safety have not been reduced:

License to provide specification of the alarm/setpoints for certain effluent radiation monitors.

Current technical specifications for the Salem station do not require that setpoints be provided for effluent channels. This change will require that alarm/trip setpoints be provided in a separate document called an Off-site Dose Calculation Manual. The setpoints in this document will be reviewed by the USNRC prior to implementation. This change will result in additional surveillance; hence, it will not decrease the margin of safety already provided in the technical specification.

Amend license to require several gaseous and liquid process instruments to be operational and in addition required that explosive gas mixtures be continuously monitored.

Gaseous and liquid process instrumenation at the Salem Station will be maintained and operated when necessary to process radioactive waste. Current technical specifications do not clearly specify what action should be taken when radiation monitoring equipment is temporarily unavailable. New technical specifications will clearly specify what actions will be taken. In addition, the technical specifications will call for continuous surveillance of explosive mixtures of hydrogen and oxygen in the gaseous waste holdup system. This change will increase the margin of safety already provided in the technical specifications.

Amend the Salem license to remove curie limitations and replace them by dose limitations.

Curie limitation are no longer required by the USNRC and have been replaced by dose limitation. Expressing environmental impact in units of curies is not sufficient alone to determine off-site environmental impact from radioactive releases. The NRC has recognized that it is more appropriate to express environmental impact in terms of cumulative dose. Operation of radwaste equipment will be based on cumulative dose delivered to man and not upon exceeding a curie limit.

Amend the Salem license to require the maintenance of document called an Offsite Dose Calculation Manual (ODCM).

The creation of a manual called an ODCM will clearly specify how PSE&G will determine radiation dose to the public. This document must also be approved by the USNRC before implementation. The amendment of the Salem license to include this document will not reduce any of the safety margins which currently exist.

LCR 81-19 (Rev. 1)

There is no Unreviewed Safety Question involved in this proposed change to our organization. It relieves plant management of many non-operating responsibilities as plant operating and support organizations are combined into a single centralized integrated structure. Headed by a Vice President as the senior nuclear manager, this organization clearly established the responsiblity for safe and efficient operation of our nuclear facilities. It also provides for unambiguous management control and effective lines of authority and communication between responsible groups involved in the management, technical and administrative support and operation of our nuclear units.

The strength and effectiveness of this organiztion resides in five key senior management positions providing the overall management direction and control of the Company's nuclear programs. These positions, Vice President - Nuclear, General Manager - Salem Operations, General Manager - Hope Creek Operations, General Manager - Nuclear Support and General Manager - Nuclear Services are further described below in terms of functional responsibility and authority.

Vice President - Nuclear

The Vice President - Nuclear is the senior nuclear manager in overall charge of our nuclear programs at Artificial Island, including plant operations and nuclear safety. The General Manager - Salem Operations, General Manager - Hope Creek Operations, the General Manager - Nuclear Support and the General Manager - Nuclear Services report directly to the Vice President - Nuclear. It is expected that the total work force will number approximately 1400 persons by the time of commercial operation of the first unit at Hope Creek. In the event of a nuclear emergency at Artificial Island, the Vice President - Nuclear assumes the role of Emergency Response Manager and takes command and control of all PSE&G on-site and off-site response activities. Additionally, the Vice President - Nuclear establishes policies on nuclear operations matters within the Company, subject to the advice and consent of senior corporate manangement. Where questions or disagreements arise within the nuclear organization concerning nuclear safety matters, the Vice President - Nuclear Department will establish Company policy. In addition, he has the authority and responsibility to determine when the plants must be shut down to maintain the safety of the facilities.

As the senior nuclear manager in overall charge of Company nuclear programs, the Vice President - Nuclear provides management direction and control for the operation and support activities associated with our nuclear facilities at Artificial Island. This includes the establishment of qualification requirements for management positions which directly support plant operations, the development of goals, objectives and Company policy relating to the safe and reliable operation of the nuclear units, and implementation of formalized programs, such as security, fire protection, radiation protection, and operator training.

The senior nuclear manager is actively involved in plant operational activities and reviews significant operating deficiencies and violations of Technical Specifications. He monitors the activities of the Nuclear Review Board that perform the independent review function of important matters affecting nuclear operation and safety. Close attention to unanticipated and unusual plant occurrences and review of operational trend analysis by the senior nuclear manager assures that the highest standards affecting plant operations are maintained.

Reporting directly to the Vice President - Nuclear is the Manager - Methods and Administration - Nuclear, who is responsible for planning and scheduling, cost control, systems development, computer applications, and coordination of all personnel and administrative functions including payroll, accounting, employment and compensation, and medical services.

General Manager - Salem Operations
General Manager - Hope Creek Operations

The General Manager for each nuclear station is responsible for the safe and efficient operation of the nuclear units and general direction of the Operating, Maintenance, Radiation Protection and Technical Support Departments. This encompasses a plant staff in excess of 400 employees. Reporting directly to the station General Manager is an Assistant General Manager, followed by four major station department heads, the Operating Manager, Maintenance Manager, Technical Manager, and Radiation Protection Engineer.

The General Manager is responsible for compliance with all applicable requirements of the NRC Operating License and Technical Specifications, and the prompt reporting of unusual events, deficiences and corrective action implementation. He monitors the activities of the Station Operations Review Committee (SORC), involving evaluations of plant safety related activities. Additionally, he is responsible for assuring that the nuclear station needs for engineering, maintenance and other

site support services are identified and can be adequately satisfied by the site support organizations to meet all requirements for safe and reliable plant operation.

The General Manager is responsible for assuring that plant staff positions are maintained by fully qualified and trained personnel. He directs the implementation of a radiation protection program that assures that radiation exposure of plant and support personnel is maintained as low as reasonably achievable. He is also responsible for the approval of operating procedures as required by Technical Specifications and for the development and control of budgets for the operation and maintenance of the station.

General Manager - Nuclear Support

The General Manger - Nuclear Support is responsible for providing support to the nuclear stations in the areas of engineering and design, reactor engineering and fuel management, the maintenance of the operating licenses, and review of the investigations conducted by the Safety Review Group. In addition, he provides support for the Nuclear Department concerning public relations, public information, and the operation of the Site Nuclear Information Center.

The station General Manager will direct the General Manager - Nuclear Support to provide assistance for performance of the required work in these areas of responsibility. The General Manager - Nuclear Support will make the determination of which activities are performed by on-site and/or off-site personnel, and furthermore provide technical direction for all off-site support functions performed in these areas. All off-site communications regarding these areas of responsibility shall be through the Nuclear Support Department.

Reporting directly to the General Manager - Nuclear Support are the Safety Review Group; three department managers responsible for licensing and regulation, nuclear safety and assessment, and fuel cycle; and the Assistant General Manager - Nuclear Engineering who, in turn, directs four additional department managers whose responsibilities include plant systems, engineering and design.

General Manager - Nuclear Services

The General Manager - Nuclear Services is responsible for providing technical support to the station organizations in the area of radiation protection; site protection including fire, security and emergency preparedness; training of licensed and non-licensed personnel; in-service inspection and non-destructive examination.

This organization also provides the stations with calibration and instrument repair, radwaste management, and maintenance support services. In addition, he is responsible for material management, warehousing and control of all contractor activities.

The station General Manager will direct the General Manager - Nuclear Services to provide assistance for performance of the required work in these areas of responsibility. The General Manager - Nuclear Services will make the determination of which activities are performed by on-site and/or off-site personnel, and furthermore provide technical direction for all off-site support functions performed in these areas. All off-site communications regarding these areas of responsibility shall be through the Nuclear Services Department.

Reporting to the General Manager - Nuclear Services are six department managers who provide services to the two nuclear stations. Under the direction and control of the General Manager - Nuclear Services, common activities required by both nuclear stations are combined to provide improved utilization of resources and greater control of the identified support functions.