PSE&G

Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038

Nuclear Department

Ref: LCR-85-03

February 8, 1985

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

Attention: Mr. Steven A. Varga, Chief
Operations Reactors Branch 1
Division of Licensing

Gentlemen:

REQUEST FOR AMENDMENT
FACILITY OPERATING LICENSES
UNIT NOS. 1 AND 2
SALEM GENERATING STATION
DOCKET NOS. 50-272 AND 50-311

In accordance with the Atomic Energy Act of 1954, as amended and the regulations thereunder, we hereby transmit copies of our request for amendment and our analyses of the changes to Facility Operating Licenses DPR-70 and DPR-75 for Salem Generating Station, Unit Nos. 1 and 2.

This amendment request consists of modification of several items contained in recently issued Amendments Nos. 55 and 28 for Salem Units 1 and 2 respectively which pertained to Radiological-Environmental Technical Specifications.

In accordance with the fee requirements of 10CFR170.21, a check in the amount of $150.00 is enclosed.

Pursuant to the requirements of 10CFR50.91, a copy of this request for amendment has been sent to the State of New Jersey as indicated below.

A001
3/40

Redd w/check #150.00
#013747

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

Sincerely,

E. A. Liden
Manager - Nuclear
Licensing and Regulation

Enclosure

C Mr. Donald C. Fischer
Licensing Project Manager

Mr. James Linville
Senior Resident Inspector

Mr. Frank Cosolito, Acting Chief
Bureau of Radiation Protection
Department of Environmental Protection
380 Scotch Road
Trenton, New Jersey 08628

Honorable Charles M. Oberly, III
Attorney General of the State of Delaware
Department of Justice
820 North French Street
Wilmington, Delaware 19801

Ref: LCR 85-03

STATE OF NEW JERSEY)
) SS. COUNTY OF SALEM
COUNTY OF SALEM

RICHARD A. UDERITZ, being duly sworn according to law deposes and says:

I am a Vice President of Public Service Electric and Gas Company, and as such, I find the matters set forth in our Request for Amendment dated February 8, 1985, are true to the best of my knowledge, information and belief.

RICHARD A. UDERITZ

Subscribed and sworn to before me
this 11th day of February, 1985

Donna G. Hitchner
Notary Public of New Jersey

DONNA G. HITCHNER
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 24, 1987

My Commission expires on

LCR 85-03

PROPOSED LICENSE AMENDMENT
SALEM GENERATING STATION
UNIT NOS. 1 AND 2

DESCRIPTION OF CHANGE

Make the following revisions to Technical Specifications Sections 3.3 and 3.11:

1. On Table 3.3-12, TABLE NOTATION 28 should be modified on Unit No. 1 to base sampling/analysis requirements on containment fan coil unit operability.

2. On Table 3.3-12, TABLE NOTATION 28 should be modified on Unit No. 2 to allow for local monitor readout capabilities when control room indication is inoperable, and base sampling/analysis requirements on containment fan coil unit operability.

3. On Table 3.3-12, (Item 2.b) Instrument R-37, CHEMICAL WASTE BASIN LINE DISCHARGE, for Unit 2, change ACTION number to ACTION 31 and in the TABLE NOTATION add new ACTION 31 which bases sampling/analysis frequency on primary-to-secondary leak determination.

4. Delete Specification 3/4.11.2.6, GAS STORAGE TANKS to eliminate an unnecessary Curie limit on the Waste Gas Decay Tanks.

REASON FOR CHANGE

1. Modification of ACTION 28, on Unit 1, will provide a reasonable grab sample/analysis schedule predicated on the possibility of radioactivity entering this effluent pathway.

2. Modification of NOTATION 28, on Unit 2, which applies to the monitors for Service Water cooling discharge from the Containment Fan Coolers would take credit for the capabilities for local monitor readouts during those times when the control room CRT display indicates lack of communications between the monitors and the computer and provides a reasonable grab sample/analysis schedule for this effluent pathway.

3. The ACTION (28) requirement for Chemical Waste Basin Line Instrument, R-37, requires sampling and analysis every 8 hours for gross radioactivity. Since the R-37 instrument is monitoring a basin that is designed to receive radioactive materials whose source could only be the result of a primary to secondary leak, many other monitors and indicators will be available and are normally used on the quantifiers of actual

or potentially releasable radioactivity. These are the R-19, R-15 and R-16 instruments and secondary coolant specific activity DOSE EQUIVALENT I-131 measurements. Sampling and analysis of the Chemical Waste Basin is therefore redundant. Additionally, the present sampling requirement for R-37 in Amendments 59 and 28 are more stringent than those for the primary quantifiers.

4. The present activity limit for the Waste Gas Decay Tanks (WGDT) was based on an extremely conservative set of assumptions. Our re-evaluation (Attachment 2) demonstrates our position that the correct radioactivity limit for Techincal Specification 3.11.2.6 would be 223,000 Curies, and that this value is not a limiting criterion and is, consequently, unnecessary as a technical specification limit. Having to perform periodic surveillance to verify compliance with a non-restrictive technical specification limit imposes an unnecessary burden on plant operating personnel.

SIGNIFICANT HAZARDS EVALUATION

1. & 2. The inclusion of the (R-13) Containment Fan Coil Unit Service Water Discharge Monitors in Table 3.3-12 was based on the possibility of radioactive material, during a LOCA, being forced into the Service Water System through a leaking Fan Cooler tube, with the leaking Fan Cooler out of service and its Service Water discharge valves open. With a Containment Fan Coil Unit (FCU) in operation, Service Water System pressure, at approximately 75 psig, would preclude forced entry (at DBA pressure of 47 psig) of radioactive material into a FCU tube leak.
Upon identification of a cooler leak, the affected FCU will be isolated; thereby eliminating the release path. With no cooler leak, the requirement for sampling/analysis once every 24 hours is conservative since, with no FCU leak there is no pathway to the environment from this source.

The use of containment fan coil unit (FCU) operability is appropriate as a key for sampling/analysis requirements for these monitors since FCU operability is one of the factors involved in establishing a potential pathway through the Service Water System to the environment.

The monitoring/sampling frequencies in the revised ACTION are appropriate considering that the basis for concern requires a combination of containment airborne activity, high containment pressure, a Containment FCU leak, and that inoperable (leaking) FCU's isolation valves to be open in order to have a potential pathway. Additionally, on Unit 2, credit is taken for the possibility for local monitor readout capabilities where only control room display (CRT) for the monitor is inoperable.

3. The sampling and analysis frequencies proposed in the R-37 ACTION Statement were derived in a safety evaluation which include the use of a transfer kinetics model which determined the time to reach equilibrium values in the secondary side from a primary to secondary leak. Our evaluation determined that stepping up the sampling frequency to daily would be adequate to properly characterize the effluent activities. Additionally, our condenser air ejector and steam generator blowdown radiation monitors are evaluated regularly following the determination of a primary to secondary leak. Significant changes in the monitor response can be used to trigger increased frequency of sampling if the leak rate increases significantly, prior to reaching a leak rate that would alarm these monitors.

4. Based on the conclusions of the evaluation contained in Attachment 2, we have determined that operation of our facility with Specification 3.11.2.6 deleted will not constitute a Significant Hazards Consideration.

   Based on our evaluation of the four items above and since these changes conform to Example (vi) of the guidance provided by the Commission in 48FR14870, we have determined that our proposed changes to Specification 3.3.3.8, Table 3.3-12 and to its Table Notation do not constitute any Significant Hazards Consideration.

ATTACHMENT 1

(page corrections)