

Public Service
Electric and Gas
Company

Corbin A. McNeill, Jr.
Vice President -
Nuclear

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 339-4800

November 27, 1985

Ref: LCR 84-22

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of Licensing
Washington, D. C. 20555

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

Gentlemen:

REQUEST FOR AMENDMENT
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
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 changes to the technical specifications regarding containment isolation valves.

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.

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PDR ADDOCK 05000272
P PDR

A001
3/27

Rec'd w/Check \$150.00
#1490063

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

Sincerely,

A handwritten signature in black ink, appearing to read "Caw", followed by a long horizontal line that tapers to a point on the right.

Enclosure

C Mr. Donald C. Fischer
Licensing Project Manager

Mr. Thomas J. Kenny
Senior Resident Inspector

Mr. Samuel J. Collins, Chief
Projects Branch No. 2, DPRP
Region 1

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

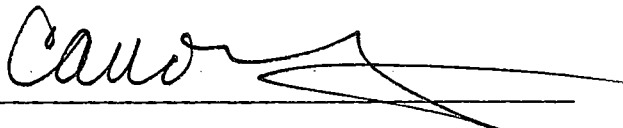
Honorable Charles M. Oberly, III
Attorney General of the State of Delaware
Department of Justice
820 North French Street
Wilmington, Delaware 19801

Ref: LCR 84-22

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

Corbin A. McNeill, Jr., 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 letter dated Nov. 27, 1985 , concerning our Request for Amendment to Facility Operating Licenses DPR-70 and DPR-75, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 27th day of November, 1985



Notary Public of New Jersey

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

My Commission expires on _____

DESCRIPTION OF CHANGE

Modify Sections 3.6.3.1 and 3.6.3, for Units 1 and 2 respectively, in accordance with the attached marked-up pages.

REASON FOR CHANGE

This change will allow an inoperable isolation valve to satisfy its OPERABILITY requirements if the valve is maintained closed to isolate its affected penetration.

SIGNIFICANT HAZARDS EVALUATION - See page 4 of 6

DESCRIPTION OF ADDITIONAL CHANGES

Table 3.6-1 of Technical Specifications Section 3.6.3.1 requires the addition, deletion and reclassification of numerous valves. The types of changes involved have been divided into five groups of valves to facilitate discussion of the reason for each change.

The first change consists of adding the following valves:

1 (2)CS900	11 (21)SS181	11 (21)VC17	11 (21)CS2
1 (2)CS901	11 (21)SS182	11 (21)VC18	12 (22)CS2
1 (2)CS902	11 (21)SS188	11 (21)VC19	11 (21)CS48
1 (2)CS903	11 (21)SS189	11 (21)VC20	12 (22)CS48
1 (2)SA262	13 (23)SS181	12 (22)VC17	11 (21)CA360
1 (2)SA264	13 (23)SS182	12 (22)VC18	12 (22)CA360
1 (2)SA265	13 (23)SS184	12 (22)VC19	1 (2)CA1714
1 (2)SA267	13 (23)SS185	12 (22)VC20	1 (2)CA1715
1 (2)SA268	1 (2)NT34	1 (2)CC119	
1 (2)SA270	1 (2)DR30		
1 (2)SA119	1 (2)FP148		

REASON FOR CHANGE

This change will ensure that the Technical Specifications Table 3.6-1 conforms to 10CFR50, Appendix J. Currently, the table is not in agreement with this document. The deficiency in the table was identified during Type C leak rate testing. PSE&G reevaluated the valves and determined that they should be considered containment isolation valves subject to Type C testing.

DESCRIPTION OF CHANGE

The second change consists of shifting valves from exempt from Type C testing to required for Type C testing. The valves are as follows:

1 (2)VC2	1 (2)SA118
1 (2)VC3	1 (2)WL190
1 (2)VC6	1 (2)SF36
1 (2)VC9	1 (2)WL191
1 (2)VC10	1 (2)SF22
1 (2)VC13	
1 (2)VC14	

REASON FOR CHANGE

This change will ensure that the Technical Specifications Table 3.6-1 conforms to 10CFR50, Appendix J. Currently, the table is not in agreement with this document. The deficiency in the table was identified during Type C leak rate testing. PSE&G reevaluated the valves and determined that they are containment isolation valves subject to Type C testing.

DESCRIPTION OF CHANGE

The third change addresses the deletion of certain valves currently listed as subject to Type C testing. The valves are as follows:

11 (21)GB4	11 (21)SS94
12 (22)GB4	12 (22)SS94
13 (23)GB4	13 (23)SS94
14 (24)GB4	14 (24)SS94

REASON FOR CHANGE

This change will ensure continued conformance of Technical Specifications Table 3.6-1 to 10CFR50, Appendix J. Although subjecting the GB4 and SS94 valves to Type C testing does not violate 10CFR50, Appendix J, deletion from testing will save time and resources. This change was identified during Type C leak rate testing. PSE&G reevaluated the valves and determined that the valves could be removed from Type C testing.

DESCRIPTION OF CHANGE

The fourth change is the deletion of valves from the list of CIVs:

11 (21)SS93
12 (22)SS93
13 (23)SS93
14 (24)SS93

REASON FOR CHANGE

This change will ensure that Technical Specifications Table 3.6-1 conforms to 10CFR50, Appendix J. Deletion of these valves will decrease confusion when classifying the valves. PSE&G reevaluated the valves, and determined they could be deleted.

DESCRIPTION OF CHANGE

The fifth change is the addition of the option to use 1(2)CC117 or 1(2)CC118 as outside isolation.

REASON FOR CHANGE

This change will ensure that the Technical Specifications Table 3.6-1 conforms to 10CFR50, Appendix J. Currently, Table 3.6-1 lists both valves subject to Type C testing. PSE&G has reevaluated these valves and determined only one must meet Type C requirements because a check valve inside containment meets requirements as an automatic isolation valve.

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

The change to the LIMITING CONDITION FOR OPERATION (Sections 3.6.3.1 and 3.6.3) is clarifying in nature since the function of the isolation valves in the table is to be able to shut, isolating each valve's affected penetration; therefore, if the valve is shut and administratively controlled in that position, it is performing its intended function and can, by definition, be considered OPERABLE.

The addition of valves to Table 3.6-1 subject to Type C testing does not involve a significant hazard. The change constitutes additional control presently not included in the Technical Specifications (more stringent surveillance requirement).

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS (cont'd)

The deletion of valves 11(21)-14(24)GB4 and 11(21)-14(24)SS94 from Type C testing does not involve a significant hazard. These valves are connected to the secondary side of the steam generator and will not be exposed to atmosphere during postulated loss of coolant accident. Also, they are not a postulated containment leakage path. Automatic isolation of these valves is in response to requirements other than containment isolation. Inclusion of the GB4 and SS94 valves penalizes, unnecessarily, the results of local leak rate testing on the containment.

The deletion of valves 11(21)-14(24)SS93 does not constitute a significant hazard. These remote manual valves are part of the Steam Generator Blowdown Sampling System upstream of the Steam Generator Blowdown Isolation Valves SS94. The portion of the Steam Generator Blowdown Sampling System inside containment meets requirements to be considered a closed system inside containment. As a closed system, valve SS93 does not act as a containment isolation barrier.

The option of using either 1(2)CC117 or 1(2)CC118 as the outside isolation barrier does not constitute a significant hazard. The Component Cooling Water Supply to the RCP motor is isolated on a Phase B isolation signal. The supply line to the RCP has two motor operated valves, 1(2)CC117 and 1(2)CC118, outside containment and a check valve inside containment. Based on a definition of a Category B penetration, this line is required to have one automatic valve inside containment and one automatic valve outside containment. Since check valves are considered automatic isolation valves when used inside containment, only one of the outside valves (either 1(2)CC117 or 1(2)CC118) is necessary to meet Type C testing requirements.

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS (cont'd)

These changes are deemed to not involve a significant hazards consideration. There is no increase in the probability or consequence of any previously analyzed accident nor is any new accident created by the operation of the Salem Units with these changes in place since there is no physical change to any component or system from that originally assumed in the accident analyses. Margins of safety are either improved (by adding valves to Table 3.6-1 constituting additional surveillance testing) or remain the same (in those instances where clarification of the term, OPERABILITY, or of what valves should be considered isolation valves is provided).

The Commission has provided examples in the Federal Register (48FR14870) as guidance for Amendments That Are Considered Not Likely To Involve A Significant Hazards Consideration. The changes constitute either a clarification of isolation valve OPERABILITY, which corresponds to example (vi) provided by the Commission; more stringent surveillance testing added to the existing technical specifications, which corresponds to example (ii) provided by the Commission; or deletion of valves which were incorrectly considered to be isolation valves and whose removal would be the result of a small clarification or refinement of the evaluation methods used to determine valve classification, which also corresponds to example (vi), provided by the Commission.

REVISED PAGES - UNIT NO. 1