

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

August 29, 1986

NLR-N86109  
Ref: LCR 85-10

Director of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Mr. Steven A. Varga, Director  
Project Directorate #3  
Division of PWR 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 a revision to Technical Specifications, Appendix A, Section 4.6.1.3, regarding containment air lock surveillance requirements. The change, in accordance with the exemption to 10 CFR 50, Appendix J, III.D.2(b)(ii) granted by the Office of Nuclear Reactor Regulation for Salem Unit 1 and 2 on June 19, 1986, will relieve the Salem units from conducting a full pressure air lock leakage test whenever air locks are opened during periods when containment integrity is not required.

In accordance with the fee requirements of 10 CFR 170.21, a check in the amount of \$150.00 was submitted with the original submittal of this request for amendment dated August 6, 1985.

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Pursuant to the requirements of 10 CFR 50.91, a copy of this request for amendment has been sent to the State of New Jersey as indicated below.

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

Sincerely,



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, NJ 08628

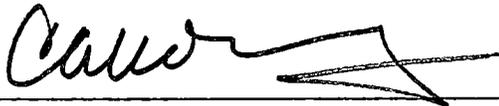
Honorable Charles M. Oberly, III  
Attorney General of the State of Delaware  
Department of Justice  
820 North French Street  
Wilmington, Delaware 19801

Ref: LCR 85-10

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

Corbin A. McNeill, Jr., being duly sworn according to law deposes and says:

I am Vice President of Public Service Electric and Gas Company, and as such, I find the matters set forth in our letter dated Aug. 29, 1986, 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 29<sup>th</sup> day of August, 1986

  
\_\_\_\_\_  
Notary Public of New Jersey

LARAIN Y. BEARD  
Notary Public of New Jersey  
My Commission Expires May 1, 1991

My Commission expires on \_\_\_\_\_

Description of Change

Change Section 4.6.1.3, Containment Air Lock Surveillance Requirements, to read:

- a. \*By pressurizing the volume between the airlock door gaskets to  $\geq 10.0$  psig and checking for an extrapolated\*\* seal leakage rate equal to or less than  $0.01 L_a$ .
  1. After each opening, except when used for multiple entries, then at least once per 72 hours.
  2. After performing maintenance which could affect the airlock door gaskets sealing capability.
  3. Prior to establishing containment integrity,
- b. By conducting an overall air lock leakage test at design pressure (47.0 psig) and verifying the overall air leakage rate is within its limit:
  1. At least once per six months#.
  2. Prior to establishing containment integrity when maintenance that could affect the airlock sealing capability was performed and the maintenance affects components other than the door gaskets,\* and
- c. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

Reason for Change

Since both Salem units have the same air locks, the surveillance requirements to ensure operability should be the same. This change incorporates ideas from NUREG 0452, clarifies the former paragraph in Unit 2, and imposes more stringent requirements in the Unit 1 technical specifications. Standardizing surveillance requirements for both units will decrease confusion when testing the air locks.

This change was originally submitted on August 6, 1985 as a combination technical specification amendment request and exemption request. In response, the NRC later deemed it necessary to first address the exemption request and then to review the subsequent associated request and then to review the subsequent associated technical specification amendment request for validity.

The change incorporates into the Salem Unit 1 and Salem Unit 2 Technical Specifications, the exemption granted by the NRC Office of Nuclear Reactor Regulation to PSE&G for the Salem Generating Station on June 19, 1986 from the requirements of 10CFR50, Appendix J, III.D.2 (b)(ii). This exemption relieves the Salem units from conducting a full pressure air lock leakage test whenever airlocks are opened during periods when containment integrity is not required. The exemption test also indicates that this same exemption has been granted for numerous plants and that the NRC staff intends, in its revision of 10CFR50, Appendix J, to alleviate the need for further similar exemption by removing the more stringent requirements.

#### Significant Hazards Consideration

This change conforms to NUREG 0452, Standard Technical Specifications for Westinghouse Pressurizer Water Reactors. Conducting the overall airlock test at least once per six months and after performance of maintenance that could affect the sealing capability does not involve a significant hazard.

Opening of the airlock has the potential of altering the sealing capability of the airlock because of possible damage to the seals. The door operator (hand wheel) shaft seals experience very little alteration as the shafts rotate within packing. History indicates the shaft seals are very effective in maintaining the sealing capability, even with door operation, and a complete test every six months and after maintenance is sufficient to assure operability.

Contrary to the shaft seals, the door seals could experience significant alteration when the doors cycle. The alterations occur as the knife edges impact the seals. Pressurization of the volume between the seals after each opening, after maintenance which could affect airlock door gaskets, and prior to establishing containment integrity, provides the necessary surveillance to ensure the sealing capability of the door seals.

The testing which will be performed under the proposed license change is identical to that which has been done in the past. No new processes or test methods are being introduced which would be different than those presently used. The changes in testing frequency have been deemed acceptable in providing assurance that the integrity of the air locks is maintained as indicated by the exemption to 10CFR50, Appendix J which has been granted. As such, there is no significant reduction in margin of safety associated with this change.

This change corresponds to examples (i) and (ii) of the guidance provided in Generic Letter 83-19, Enclosure 1, by the Commission for Amendments That Are Considered Not Likely To Involve Significant Hazards Considerations. The change to Unit No. 1 constitutes addition of a more stringent surveillance requirement [example (ii)] and the change conforms to example (i) for both Salem units in that it is an administrative change that achieves consistency between the Salem Technical Specifications and NUREG 0452, Standard Technical Specifications for Westinghouse Pressurized Water Reactors. Based on the above, we have determined that this change involves no Significant Hazards Consideration.