

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

December 10, 1986

NLR-N86167

Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20014

Attention: Mr. Vincent S. Noonan, Director
PWR Project Directorate #5
Division of PWR Licensing A

Gentlemen:

REQUEST FOR AMENDMENT
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
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 our request for amendment and our analysis of the change to Facility Operating Licenses DPR-70 and DPR-75 for Salem Generating Station, Unit Nos. 1 and 2.

The amendment request would revise the wording of the May 6, 1983 Order, indicating that the long-term corrective actions implementing the Order will be performed in accordance with a new Appendix 7.A of the licensee's Updated Final Safety Analysis Report (UFSAR).

In accordance with the fee requirements of 10CFR170.21, a check in the amount of \$150.00 is enclosed. A copy of this amendment request has been forwarded to the State of New Jersey in accordance with the requirements of 10CFR50.91.

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

Sincerely,



Enclosure

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PDR ADOCK 05000272
P PDR

A001
1/39

C Mr. Donald C. Fischer
USNRC Licensing Project Manager

Mr. Thomas J. Kenny
USNRC Senior Resident Inspector

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

Mr. David M. Scott, Acting Chief
Bureau of Nuclear Engineering
Department of Environmental Protection
CN 411
Trenton, NJ 08628

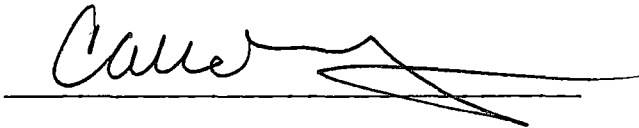
Honorable Charles M. Oberly, III
Attorney General of the State of Delaware
Department of Justice
820 North French Street
Wilmington, DE 19801

Ref: LCR 86-11

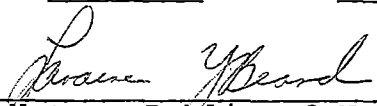
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

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 December 10, 1986, concerning Facility Operating Licenses DPR-70 and DPR-75, is true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 18th day of December, 1986



Notary Public of New Jersey

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

My Commission expires on _____

PROPOSED CHANGE TO
FACILITY OPERATING LICENSES
DPR-70 AND DPR-75

REF: LCR 86-11

Proposed Change

We request that the May 6, 1983 Order be amended to read:

1. The licensee shall implement and/or maintain the items described in Appendix 7.A of the licensee's Updated Final Safety Analysis Report. The licensee may make changes to Appendix 7.A without prior approval by the Commission in accordance with 10CFR50.59.

Discussion

On May 6, 1983, the Nuclear Regulatory Commission issued an Order modifying the operating licenses for the Salem Nuclear Generating Station, Units 1 and 2. The Order referenced a series of letters in which PSE&G had submitted its corrective action program in response to the reactor trip breaker failures. This corrective action program included short-term, interim and long-term actions.

Subsequently, the Order was modified by letter dated January 31, 1984, changing the implementation schedule for certain long-term actions, and again on March 18, 1986, removing the requirement to submit Nuclear Oversight Committee Reports on a quarterly basis. The March 18, 1986 letter also stated that the terms of the Order have been satisfactorily completed.

We have since performed a detailed review of the correspondence addressing our corrective action program and identified a total of forty-five (45) long-term program commitments which we have consolidated into a new UFSAR appendix (attachment 1). The contents of this appendix will be controlled in accordance with the provisions of 10CFR50.59.

This initiative will serve to improve our present program by enhancing administrative control of commitment implementation and by facilitating in-house compliance verification efforts.

The forty-five (45) program element descriptions are grouped in Appendix 7.A according to the following topics: Procurement, Training, Operating Procedures, Management, Maintenance and Surveillance, and Control of Vendor Information.

In four (4) instances, our method of implementation has evolved to respond to changing station conditions or to utilize recently developed industry standards and practices. These four are discussed in detail in Attachment 2.

Significant Hazards Consideration Analysis

We have evaluated the proposed change and the program modifications described in Attachment 2 and conclude that they do not involve a significant hazards consideration.

The proposed change does not increase the probability or the consequences of an accident previously evaluated because both the Order requirement "to implement and/or maintain the items" and the breaker-related Technical Specification requirements remain in effect.

The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated because the change is administrative in nature and entails no physical changes in plant equipment or operating procedures.

The proposed change does not involve a significant reduction in a margin of safety because the change is administrative in nature and entails no physical changes in plant equipment or operating procedures.

ATTACHMENT 1

SALEM GENERATING STATION
UPDATED FINAL SAFETY ANALYSIS REPORT

APPENDIX 7.A

PROGRAM ELEMENT DESCRIPTIONS
RESULTING FROM THE IMPLEMENTATION
OF THE MAY 6, 1983 ORDER

1. PROCUREMENT
2. TRAINING
3. OPERATING PROCEDURES
4. MANAGEMENT
5. MAINTENANCE AND SURVEILLANCE
6. CONTROL OF VENDOR INFORMATION

7.A.1 PROCUREMENT

7.A.1.1 Detail Specification No. 83-8248 shall require:

7.A.1.1.1 That all undervoltage trip attachments (UTAs) have incorporated all design changes identified in Westinghouse Switchgear Division Procedure NCD-ELEC-18.

7.A.1.1.2 That all UTAs be lubricated per Westinghouse Technical Bulletin NSD-TB-83-02.

7.A.1.1.3 That the manufacturer mount on a test breaker and electrically test each UTA twenty-five (25) consecutive times without failure.

7.A.1.1.4 That the manufacturer seal the two (2) cover bolts on the movable core cover and the reset lever spring adjustment screw such that future removal of cover bolts or future screw adjustment is detectable.

7.A.1.1.5 That the manufacturer submit a Certificate of Conformance documenting the above items.

7.A.1.2 The procurement program will require item classifications by Nuclear Engineering personnel with verification by Quality Assurance personnel.

7.A.1.3 Quality Assurance personnel will conduct periodic audits of the procurement program to ensure proper item classification, application of procurement procedures and practices, as well as, to verify procedural adherence by appropriate personnel.

7.A.2 TRAINING

7.A.2.1 The difference between demand and confirmatory indications for the Reactor Protection System (RPS) shall be an integral part of initial and requalification training for all licensed operators.

7.A.2.2 The procedural steps to be taken in response to an ATWS event shall be an integral part of simulator training for all licensed operators.

7.A.2.3 Identifying the location and type of RPS indicators and alarms shall be an integral part of simulator training for all licensed operators.

7.A.2.4 First-line supervisory training will be provided to all individuals, except licensed operators, within 12 months of their assumption of supervisory duties within the station. Individuals filling positions that require the acquisition of a Senior Reactor Operator (SRO) license

will complete the program within 12 months of their NRC examination date. This permits them the same time allowance for program completion as the remaining supervisory classifications while allowing them time to complete license training.

7.A.2.5 Technical training will be provided to support the professional staff not in station positions.

7.A.2.6 A formal training program will be provided for senior level supervisory personnel. This program shall also offer refresher/requalification training for management and senior supervisory personnel.

7.A.2.7 First-line supervisory training will address the classification of procurement documents as well as the initiation, classification, processing and closeout of work orders with emphasis on QA requirements, test/retest requirements, and interdepartmental coordination.

7.A.3 OPERATING PROCEDURES

7.A.3.1 All procedures associated with a reactor trip have been revised to require the operator to manually trip the reactor anytime he receives a demand first out annunciator and verification of this condition on the Reactor Protection Status Panel.

7.A.3.2 The Shift Routine Logs shall require that an Overhead Annunciator Control Console and Status Panel Alarm/Indication Check be performed at the beginning of each shift.

7.A.3.3 A dedicated communicator shall be assigned to each shift.

7.A.3.4 The directive utilized by the Operating Department to verify operability of safety related equipment shall require that testing in accordance with the Technical Specifications is completed prior to declaring equipment operable.

7.A.4 MANAGEMENT

7.A.4.1 A member of the Independent Safety Engineering Group (Safety Review Group) will serve on the Station Operations Review Committee (SORC).

7.A.4.2 PSE&G will establish a Nuclear Oversight Committee (NOC) to provide management with an independent basis for evaluating the effectiveness of nuclear safety. The Committee shall include 3-5 members and will consist of nuclear utility operations executives, college professors and former regulators.

7.A.4.3 The NOC shall submit reports to the Vice President - Nuclear following each quarterly meeting. The reports shall include an evaluation of overall management attention to nuclear safety.

7.A.4.4 On a sample basis, Quality Assurance shall perform a detailed review of safety/non-safety related work orders to assure compliance to program requirements such as proper classification, etc.

7.A.5 MAINTENANCE AND SURVEILLANCE

7.A.5.1 PSE&G has established a program to provide traceability on the reactor trip breakers. This program ensures traceability of all work to a particular breaker and its location.

7.A.5.2 Cleaning of the breakers and Westinghouse recommended lubrication is performed on the undervoltage trip attachments (UTAs) during semi-annual testing and during each refueling outage.

7.A.5.3 Cleaning of the breaker cabinets is performed during each refueling outage. The circuit breaker rooms are cleaned by a custodian on normal work days.

7.A.5.4 Procedure M3Q-2 incorporates a range of acceptable dropout voltages and instructions to replace any devices which fall outside the specified range. In addition, new UTAs installed in the plant will be tested 10 times with a 30 minute interval between each test and any devices which fail will be rejected.

7.A.5.5 The following tests will be performed before and after the semi-annual testing:

- 3 UTA trip timing tests,
- 3 shunt trip timing tests, and
- 3 closure timing tests

7.A.5.6 A bar force (static trip) measurement and an output force (added weight) measurement will be performed after semi-annual testing and after UTA replacement.

7.A.5.7 The commitment for NRC notification is addressed by notation to Table 3.3-1 of the Salem Technical Specifications.

7.A.5.8 Surveillance testing of the main reactor trip breakers utilizing the UTA has been increased to a monthly interval. This will be accomplished utilizing existing I&C Procedures, PD 18.1.1008 (.009)* and new I&C Procedures IC 18.1.010 (.011)*.

7.A.5.9 Surveillance testing of the main and bypass reactor trip breakers utilizing the shunt trip will be performed on a monthly basis utilizing I&C Procedures PD 18.1.004 (.005)*, "Train A (B) Reactor Trip Breakers and P-4 Permissive Test."

7.A.5.10 Surveillance testing utilized to prove operability of the reactor trip breakers on a 24 hour prior to start-up frequency will provide for independent testing of the shunt and undervoltage attachments and operation of the breakers utilizing the manual trip switches.

7.A.5.11 Modifications to I&C Procedures PD 18.1.008 (.009)* and IC 18.1.010 (.011)* which are to be performed on a monthly basis have been made to provide for the utilization of the Sequence of Events recorder to monitor the response time of the main trip breakers from the Solid State Protection System. This data will be recorded as part of these procedures and also in a log. Included in these procedures will be specific acceptance criteria requiring that if exceeded, the NRC be notified prior to the performance of any corrective action.

7.A.5.12 In addition, I&C Procedures PD 18.4.002 (.005)* have been modified to include time response testing of both the main and bypass reactor trip breakers. This surveillance testing will continue to be performed on an 18 month interval prior to restart after refueling.

* Unit No. 2

7.A.6 CONTROL OF VENDOR SUPPLIED INFORMATION

PSE&G shall establish a Vendor Document Control System that encompasses the following elements:

7.A.6.1 Procedures regarding control of vendor manuals.

7.A.6.2 Review of vendor manuals by Nuclear Engineering to determine applicability to installed equipment.

7.A.6.3 Identification of manuals applicable to Q-listed equipment.

7.A.6.4 Requirement that all safety related vendor manuals be incorporated under the Vendor Document Control System.

7.A.6.5 Issuance of controlled, numbered copies of vendor manuals.

7.A.6.6 Review of manual revisions and new manual issues by Station user departments to ensure incorporation of applicable new information into applicable procedures.

7.A.6.7 Periodic audit of controlled copy holder files to ensure existence of latest issues.

7.A.6.8 Establish and maintain interface with vendors of Q equipment to assure receipt of most recent applicable information.

7.A.6.8.1 Establish and maintain information update programs with key vendors such as Westinghouse (NSSS supplier), ALCO, (Diesel Mfr.), General Electric, etc.

7.A.6.8.2 Participate in the NPRDS and SEE-IN programs which comprise INPO's Vendor Equipment Technical Information (VETIP).

7.A.6.8.3 Establish a focal point within the Nuclear Department for receiving and processing all uncontrolled vendor technical information received on site for the Salem units.

ATTACHMENT 2

1. Training Commitment 7.A.2.4

First-line supervisory training will be provided to all individuals, except licensed operators, within 12 months of their assumption of supervisory duties within the station. Individuals filling positions that require the acquisition of a Senior Reactor Operator (SRO) license, will complete the program within 12 months of their NRC examination date. This permits them the same time allowance for program completion as the remaining supervisory classifications while allowing them time to complete license training.

Original Description

"In an effort to develop and maintain a high caliber of supervisory personnel at our nuclear generating stations, we have initiated the development of a training program for first level supervisors. This training will be provided for an individual prior to his assignment to supervisory responsibilities in the station, as well as to all first level supervisors now providing supervisory functions."

Commentary

Based on the number of newly hired or promoted individuals, the current program scheduling guidelines for the Nuclear Training Department only call for presentation of the TSSP-1 program twice each year. Also, newly hired/promoted supervisors are under the direct supervision of individuals with a greater level of experience who can provide the necessary skills in the interim through coaching.

2. Training Commitment 7.A.2.7

First-line supervisory training will address the classification of procurement documents as well as the initiation, classification, processing and closeout of work orders with emphasis on QA requirements, test/retest requirements, and interdepartmental coordination.

Original Description

"Proficiency in determination of classification of work orders and procurement documents will be maintained by on-going periodic training and indoctrination sessions.

To maintain proficiency in the initiation, processing and closeout of work orders ongoing training will be conducted, with emphasis on Quality Assurance requirements, test/retest requirements, and interdepartmental coordination."

Commentary

The training elements from the original description paragraphs have been consolidated into paragraph 7.A.2.7. Our first-line supervisory training covers all station administrative procedures to include procurement, work orders and usage of the Master Equipment List for classification purposes.

Paragraph 7.A.1.3 reiterates our quality commitment to monitor and evaluate the procurement process. Audit findings, to include any concerning the classification of procurement documents, are formally brought to the attention of management in accordance with the provisions of our QA program. Refresher training may be indicated at that time.

Administrative control of work order classification is discussed in Item No. 3, below.

3. Management Commitment 7.A.4.4

On a sample basis, Quality Assurance shall perform a detailed review of safety/non-safety related work orders to assure compliance to program requirements such as proper classification, etc.

Original Description

"An independent Quality Assurance review of the classification of each non-safety-related work order is now required prior to commencing work."

Commentary

Work order classification has improved significantly at Salem due to improvements to the Master Equipment List (MEL), including both its accuracy and its issuance as a controlled document. Also, we have increased emphasis in training on the proper use of the MEL for personnel who classify or review work orders. Accordingly, we have gone to a surveillance mode of monitoring this activity.

4. Vendor Information Commitment 7.A.6.4

Establish and maintain interface with vendors of Q-equipment to assure receipt of most recent applicable information.

7.A.6.4.1 Establish and maintain information update programs with key vendors such as Westinghouse (NSSS Supplier), ALCO (Diesel Mfr.), General Electric, etc.

7.A.6.4.2 Participate in the NPRDS and SEE-IN programs which comprise INPO's Vendor Equipment Technical Information Program (VETIP).

7.A.6.4.3 Establish a focal point within the Nuclear Department for receiving and processing all uncontrolled vendor technical information received on site for the Salem units.

Original Description

"Identification of vendors for Q-equipment who have manual updating programs, and periodic contact with these vendors to assure receipt of most recent applicable information."

Commentary

In response to an acknowledged need, PSE&G established a Nuclear Department focal point for uncontrolled vendor information. Since its inception in May 1983, this group has processed some 1,382 technical documents supplied by vendors.

In line with other utilities, we are following the guidelines of INPO Good Practice MA-304 and participate in INPO's VETIP program. VETIP provides a forum for information exchange and evaluation among utilities and, in conjunction with the site-specific vendor update programs referenced above, provides an effective vendor interface.

Our original practice of contacting vendors on an annual basis initially produced significant amounts of technical information that we incorporated into our vendor document system. Recently, however, this activity is providing little or no new technical information. Vendors have become progressively reluctant to respond to our requests and the bulk of the information we receive is for new product lines. For example, in 1985 we sent out 263 letters to vendors and received 162 responses that resulted in only four (4) usable items of information. Consequently, we have discontinued this practice.