

Public Service  
Electric and Gas  
Company

**Corbin A. McNeill, Jr.**  
Senior Vice President -  
Nuclear

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

OCT 13 1987

NLR-N87187

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

REQUEST FOR DISCRETIONARY ENFORCEMENT  
TECHNICAL SPECIFICATION 3.8.1.1  
FACILITY OPERATING LICENSE DPR-75  
SALEM GENERATING STATION  
UNIT NO. 2  
DOCKET NO. 50-311

1987 OCT 20 A 10:00  
USNRC-DS

Public Service Electric and Gas Company (PSE&G) hereby requests discretionary enforcement of Technical Specification Action Statement 3.8.1.1.a for Salem Unit 2. As discussed in Attachment 1 to this letter, plant operation subsequent to the granting of this request would not create a significant hazard to public health and safety. The requested relief would provide an additional three day period beyond the current 72 hour time limit indicated in Action Statement 3.8.1.1.a to restore the electrical power systems to operable status.

The purpose of this request is to enable the degassing of the No. 1 Station Power Transformer insulating oil. To degas the transformer oil, the transformer must be isolated. Consequently, one of the two offsite 500 Kv power supplies must be removed from service. Although Salem Unit 1 will be in a refueling outage and not adversely affected by the isolation of the transformer, Salem Unit 2 will be in power operation and require the operability of two independent offsite circuits.

Discretionary enforcement is being requested as opposed to a permanent change to the Technical Specifications in this situation as the degassification of the transformer oil represents a unique preventative maintenance occurrence. This activity would not be performed unless sample results indicate that degassification is necessary. Oil sampling to allow this determination is performed on the station power transformers every six months. The planned degassification of the No. 1 Station Power Transformer insulating oil during the current refueling outage represents the only time this activity will have been performed since the transformer was initially put into service. The most recent oil sample results for the No. 2

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Station Power Transformer do not indicate that degassification would be necessary in the near future. Although PSE&G cannot guarantee that neither Station Power Transformer will have to be degassed at any time in the future, the need to perform this activity will be rarely encountered over the life of the plant.

The projected date for the performance of this activity is October 25, 1987. We ask that your response to this request for discretionary enforcement be provided as soon as possible for planning purposes. Subsequent to your approval of this request, PSE&G will submit a report identifying all actions taken within 14 days of the completion of the transformer maintenance.

If you have any questions with regard to this request, please do not hesitate to contact us.

Sincerely,



Attachment

C Mr. D. C. Fischer  
USNRC Licensing Project Manager

Mr. T. J. Kenny  
USNRC Senior Resident Inspector

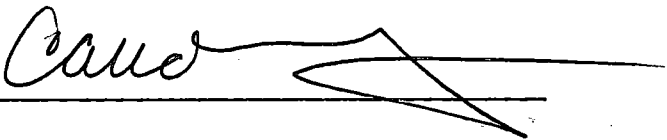
Mr. W. T. Russell, Administrator  
USNRC Region I

Mr. D. M. Scott, Chief  
Bureau of Nuclear Engineering  
Department of Environmental Protection  
380 Scotch Road  
Trenton, NJ 08628

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

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

I am Senior Vice President of Public Service Electric and Gas Company, and as such, I find the matters set forth in our letter dated October 13, 1987 , concerning Facility Operating License DPR-75 for Salem Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me  
this 13<sup>th</sup> day of October, 1987

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

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

**EILEEN M. OCHS**  
**NOTARY PUBLIC OF NEW JERSEY**  
**My Commission Expires July 16, 1992**

## ATTACHMENT 1

### Technical Specification 3/4.8.1.1

Technical Specification (TS) 4.8.1.1 identifies the operability requirements for A.C. electrical power sources. Specifically, TS 4.8.1.1.a requires "Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system (vital bus system)". The basis for this specification combined with the other Tech. Specs. for A.C. and D.C power sources is to "ensure that sufficient power will be available to supply the safety related equipment requirement for (1) the safe shutdown of the facility and (2) the mitigation and control of accident conditions within the facility." The required minimum A.C and D.C. power sources and distribution system satisfy the requirements of General Design Criterion 17 of Appendix "A" to 10CFR Part 50.

### Summary of Current Situation

The No. 1 Station Power Transformer, which provides one of the two offsite power supplies from the 500 Kv power distribution system to the emergency power distribution system, requires preventative maintenance. A recent sample of the transformer insulating oil revealed high gas levels in the oil. The proper method for degassing the oil requires the transformer to be isolated from the distribution system. This results in the removal of one of the two offsite power (500 Kv) systems from service. The degassification technique requires the oil to be completely drained from the transformer, under vacuum, then filtering the oil and refilling the transformer with the oil. The time required to simply pump the 26,500 gallons of insulating oil to and from the processing equipment is greater than 52 hours (flow rate approximately 1,000 gallons per hour). The estimated duration for performing the degassification is six days. This will allow for time to perform required sampling on the oil and will accommodate any difficulties which are encountered during the degassification process. Presently, Technical Specification 3.8.1.1.a allows 72 hours for an offsite circuit to be inoperable. As such, an additional 72 hours are needed, beyond that allowed by the action statement, to perform the degassification.

### Request for Discretionary Enforcement

PSE&G intends to perform the degassification of No. 1 Station Power Transformer during the present Salem Unit 1 refueling outage, (the projected date is October 25, 1987) with Unit 1 defueled. Consequently, Unit 1 will meet its Technical Specification requirements of one offsite transmission network for Modes 5 and 6. However, removal of the transformer for 6 days would require Unit 2 to be shut down from power operation after 72 hours. PSE&G therefore requests that NRC Region I grant discretionary enforcement of Technical Specification Action

Statement 3.8.1.1.a., for a period that would permit power operation for an additional three days beyond the presently allowed 72 hours, to allow for proper degassification of the No. 1 Station Power Transformer.

Operation under the requested discretionary enforcement will not place the plant in an unsafe condition. PSE&G believes that there is ample technical justification for the requested relief, in that:

- The degassification of the transformer will be performed with all onsite 1E vital distribution equipment for both Salem Unit 1 and 2 OPERABLE.
- The 13.8 Kv gas turbine will be available as an additional source of power to the emergency distribution system.
- The distribution system downstream of the remaining (No. 2) Station Power Transformer is designed with redundancy and is capable of supplying power to both Salem Units 1 and 2 emergency power distribution systems. In addition, load requirements for Salem Unit 1 during the degassification will be minimal as the reactor will be defueled at the time. With one unit in a defueled condition, it will not be possible to encounter a worst case emergency load profile (LOCA on one unit, shutdown of the other).
- The Salem units have been designed to be capable of being safety shut down from full power operation in the event of a loss of all offsite power as stated in the UFSAR, Section 8.1.4.1. Maintaining vital power systems in excess of the Unit 1 Technical Specifications, along with having the gas turbine (13.8 Kv) generator available add further assurance that the units will be maintained in a safe condition.
- The degassification of the No. 1 Station Power Transformer will enhance its overall reliability.
- Two offsite 500 Kv power sources will be maintained operable. Thus, redundant offsite power sources will be available to the No. 1 Station Power Transformer.
- The degassification of the transformer will not be performed during forecasted severe weather conditions (i.e., tornado, hurricane, etc.).