

Public Service
Electric and Gas
Company

Steven E. Miltenberger

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-4199

Vice President and Chief Nuclear Officer

July 15, 1988
NLR-N88106

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

Gentlemen:

REQUEST FOR AMENDMENT
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
SALEM GENERATING STATION
DOCKET NOS. 50-272 AND 50-311

Public Service Electric and Gas Company (PSE&G) hereby submits a request to amend Appendix A of Facility Operating License Nos. DPR-70 and DPR-75 in accordance with 10CFR50.90. This amendment request revises Section 6, Administrative Controls, by deleting Figure 6.2-1 and 6.2-2 and replacing them with more general organizational requirements. This change is consistent with Generic Letter 88-06. An additional change to Section 6 is submitted to reflect a recent title change for the Vice President - Nuclear.

It has been determined that the proposed amendment does not involve a significant hazards consideration pursuant to 10CFR50.92. A description of the amendment request and the basis for a no significant hazards consideration determination is provided in Attachment 1. The proposed revised technical specification changes are shown in Attachment 2.

The proposed changes contained in this amendment request are administrative in nature in that they do not affect the operation of the plant nor do they change the intent of the existing Technical Specifications. In addition, similar license amendments were obtained by Carolina Power & Light Company for Shearon Harris and by Florida Power & Light Company for Turkey Point and St. Lucie. Since this proposed amendment is purely administrative and since NRC has provided guidance for processing it via Generic Letter 88-06, specialized technical review should not be required for approval of this request. Therefore, PSE&G believes that the proposed amendment can be classified as a Category 2 change in accordance with the new NRC Amendment Review Procedure.

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PSE&G has evaluated this request pursuant to 10CFR170.21 and determined that a license amendment application fee is required. A check for \$150.00 is enclosed in payment of this fee. In accordance with 10CFR50.91(b)(1), a copy of this amendment request has been sent to the State of New Jersey.

Pursuant to 10CFR50.4(b)(2)(ii), this submittal includes one (1) signed original and thirty-seven (37) copies. Should you have any questions regarding this submittal, please do not hesitate to contact us.

Sincerely,



Enclosure/Attachments
Affidavit

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

Mr. D. C. Fischer
USNRC Licensing Project Manager

Mr. R. W. Borchardt
USNRC Senior Resident Inspector

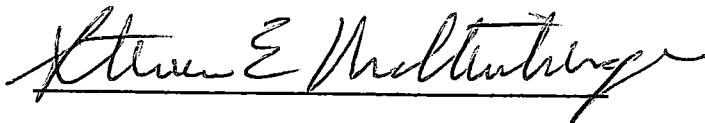
Mr. D. M. Scott, Chief
Bureau of Nuclear Engineering
Department of Environmental Protection
380 Scotch Road
Trenton, NJ 08628

Ref: LCR 88-07

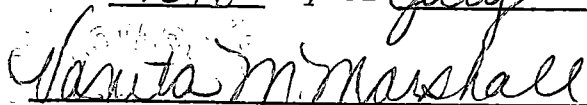
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

Steven E. Miltenberger, being duly sworn according to law deposes
and says:

I am Vice President and Chief Nuclear Officer of Public Service
Electric and Gas Company, and as such, I find the matters set
forth in our letter dated July 15, 1988 , concerning Facility
Operating Licenses DPR-70 and DPR-75 for Salem Generating
Station, are true to the best of my knowledge, information and
belief.



Subscribed and Sworn to before me
this 15th day of July, 1988


Notary Public of New Jersey

My Commission expires on _____

VANITA M. MARSHALL
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires May 6, 1993

**CHANGES TO FACILITY OPERATING LICENSE
SALEM GENERATING STATION - UNIT NOS. 1 & 2
FACILITY OPERATING LICENSE NOS. DPR-70 & DPR-75
DOCKET NOS. 50-272 & 50-311**

LCR 88-07

I. Description of the Changes

The proposed amendments make two types of changes to the Administrative Controls, Section 6.0, of the Salem Generating Station Technical Specifications, Units 1 and 2. The first change involves the deletion of the offsite and onsite organization charts, Figures 6.2-1 and 6.2-2, and replaces them with more general requirements which capture the essential aspects of the organizational structure. Technical Specifications (TS) 6.1.1 and 6.1.2 have been supplemented with the necessary general requirements specified in Generic Letter 88-06, dated March 22, 1988.

The second change replaces the reference to the Vice President - Nuclear, contained in TS 6.1.2, with a more generic title, senior corporate nuclear officer. For consistency, TS 6.2.1, 6.5.1.6, 6.5.1.8, 6.5.1.9, 6.5.2.4.2, 6.5.2.6, 6.5.2.7, 6.6.1, and 6.7.1, have also had the title, Vice President - Nuclear, replaced with the title, senior corporate nuclear officer. This change is necessary because the title, Vice President - Nuclear, has been changed to, Vice President and Chief Nuclear Officer, and the Technical Specifications as currently structured should reflect this change. However, this amendment request proposes to replace the specific title, Vice President - Nuclear, with a more generic title, senior corporate nuclear officer. We believe that this change will alleviate the need to process future amendment requests to reflect title changes for the Vice President and Chief Nuclear Officer.

II. Reason for the Changes

The onsite and offsite organizations are defined by organization charts included in the Administrative Controls sections of the Salem Generating Station Technical Specifications (TS). As such, this requires that a License Amendment be processed for changes in organizational structure. PSE&G has reviewed the content requirements for the Administrative Controls section of the TS, which are specified in 10 CFR 50.36(c)(5). This regulation requires that the TS contain the controls and provisions "... necessary to assure operation of the facility in a safe manner...", but does not specifically require the inclusion of detailed organization charts in the TS.

Since detailed organization charts are not specifically required by regulation, and since through experience the NRC staff has determined, "...that organization charts by themselves are of little help in ensuring that the administrative control requirements are met.", with appropriate changes to the administrative control requirements, PSE&G proposes to remove the organization charts from the TS. The removal of organization charts from the TS implements an improvement recommended by NRC in Generic Letter 88-06. This change was approved by NRC on January 27, 1988 for the Shearon Harris Plant on a lead plant basis.

II. Reason for the Changes (continued)

The NRC will continue to be informed of organizational changes through other required controls. The Code of Federal Regulations, Title 10, Part 50.34 (b)(6)(i) requires that the applicants organizational structure be included in the Final Safety Analysis Report. Chapter 13 of the Salem Generating Station Updated Safety Analysis Report (UFSAR) provides a description of the organization and detailed organization charts. This chapter of the UFSAR already contains the minimum information specified in Generic Letter 88-06. In accordance with 10 CFR 50.71 (e), PSE&G submits annual updates to the UFSAR and will continue this practice. In addition, changes to the organization described in the Quality Assurance Program are governed by 10 CFR 50, Appendix B and by 10 CFR 50.54 (a)(3). Any changes to the organizational structure which have the potential to decrease the effectiveness of the Quality Assurance Program require prior NRC approval. PSE&G is in compliance with this requirement since the proposed amendments do not reduce the effectiveness of the Quality Assurance Program.

Furthermore, it is PSE&G's practice to inform the NRC of major organizational changes affecting the nuclear facilities prior to implementation. It is our intention to continue this practice for such future changes in organizational structure.

This proposed amendment also replaces the title, Vice President - Nuclear, with a more generic title, senior corporate nuclear officer. PSE&G believes that this type of change is necessary because it improves efficiency for both the NRC and ourselves. It will preclude the need for processing license amendments merely to reflect title changes, such as, the recent change for the Vice President - Nuclear to Vice President and Chief Nuclear Officer. These positions are basically equivalent and this change had no affect on the overall safe operation of the plants.

III. Significant Hazards Analysis Consideration

The standards used to arrive at a determination that a request for license amendment involves no significant hazards consideration are contained in 10 CFR 50.92. These regulations state that no significant hazards considerations are involved if the operation of the facility in accordance with the proposed amendment would not : (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed below.

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated. The changes being proposed are administrative in nature and do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. For these reasons, the proposed changes do not affect the probability or consequences of accidents previously analyzed.

III. Significant Hazards Analysis Consideration (cont'd)

The NRC will continue to be informed of organizational changes through other required controls. The Code of Federal Regulations, Title 10, Part 50.34(b)(6)(i) requires that the applicants organizational structure be included in the Final Safety Analysis Report. Chapter 13 of the Salem Generating Station Updated Safety Analysis Report (UFSAR) contains a description of the organization and detailed organization charts, equivalent to or better than those which exist in the Technical Specifications. In accordance with 10 CFR 50.71(e), PSE&G submits annual updates to the UFSAR.

Changes to the organization described in the Quality Assurance (QA) Program are governed by 10 CFR 50, Appendix B, and 10 CFR 50.54(a)(3). Any changes to the organizational structure which have the potential to decrease the effectiveness of the QA Program require prior NRC approval. This amendment request proposes no changes to the current organizational structure, rather, it proposes to remove inaccurate information in favor of more general organizational requirements.

2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. The changes being proposed are purely administrative in nature and will not lead to material procedure changes or to physical plant modifications. In addition, there are no management changes being proposed as a result of this amendment request. For these reasons, the proposed changes do not create the possibility of a new or different kind of accident.
3. The operation of the facility in accordance with the modified specification would not involve a significant reduction in a margin of safety. The changes being proposed are administrative in nature and do not relate to or modify safety margins defined in and maintained by the Technical Specifications (TS).

The changes proposed herein do not reduce the TS safety margin since all organizational responsibilities are being adequately implemented, all personnel are properly qualified, and controlling the organizational details in the UFSAR will be commensurate with controlling them in the TS.

Through PSE&G's strong Quality Assurance Program and our commitment to maintain only qualified personnel in positions of responsibility, it is assured that safety functions performed by the onsite and offsite organizations will continue to be performed at a high level of competence.

IV. Conclusions

It is PSE&G's conclusion that this amendment request is similar to Example e(i) of "Amendments That Are Not Likely To Involve A Significant Hazards Consideration", published in Federal Register Volume 51, Number 44, dated March 6, 1986. Based on this similarity and the detailed discussion provided in Sections II and III of this submittal, PSE&G believes that the proposed changes do not involve a Significant Hazards Consideration.