

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

September 12, 1988

NLR-N88136

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

Gentlemen:

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

Public Service Electric and Gas Company (PSEG&) 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 proposes incorporation of Technical Specifications for reactor head vents in accordance with the requirements of Generic Letter 83-37 and Item II.B.1 of NUREG 0737.

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 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 formalize the requirements for reactor head vents as required by NUREG 0737. The change itself does not make design changes to the plant as the head vent design was previously approved by the NRC staff.

Since this proposed amendment is purely administrative and since NRC has provided guidance for processing it via Generic Letter 83-27, 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. J. C. Stone
USNRC Licensing Project Manager

Mr. R. W. Borchardt
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

Ref: LCR 88-02

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 September 12, 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.

Steven E. Miltenberger

Subscribed and Sworn to before me
this 12th day of September, 1988

Eileen M. Ochs
Notary Public of New Jersey

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

My Commission expires on _____

PROPOSED LICENSE CHANGE
SALEM GENERATING STATION
DOCKET NOS. 50-272 & 50-311

REACTOR COOLANT SYSTEM
HEAD VENT
LIMITING CONDITION FOR OPERATION

Description of Change

Add new Sections 3/4.4.12 and B3/4.4.12 to Salem Unit 1 and Salem Unit 2 Technical Specifications. These sections incorporate the requirements for and bases of the Reactor Vessel Head Vent System.

Reason for Change

This change is being submitted to comply with Item II.B.1 of NUREG 0737 and Generic Letter No. 83-37 guidelines for Reactor Vessel Head Vent System technical specifications.

The specific plant design for the Reactor Vessel Head Vents was previously reviewed by the NRC as documented in a letter from S. A. Varga to R. A. Uderitz dated September 27, 1983. That evaluation approved the current plant design, except for removing power to the valves to prevent inadvertent valve operations. This practice would preclude indication of valve position in the Control Room since indication is powered from the same circuit. The Salem Reactor Vessel Head Vent system has since been modified to use a key lock system to prevent inadvertent operation. Power is maintained to these valves and thus position is indicated in the Control Room. This is in accordance with the guidance provided in NUREG 0737, Item II.B.1, Subitem A(7). Thus the current system meets the guidance provided in the September 27, 1983 letter.

Section 3/4.4.11 has been included and left intentionally blank for the Salem Unit 1 Technical Specifications to maintain numerical similarity between units.

Significant Hazards Consideration

Operation of Reactor Vessel Head Vent System in accordance with the proposed Technical Specification change does not involve a significant hazards consideration.

- a. The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report will not be significantly increased.

The proposed change requires that a Reactor Vessel Head Vent path be operable with the valves shut when the reactor is in MODE 1-4.

A positive indication of the valve position is provided in the control room. The probability of the vent path failing to close, once opened, is minimized by design in circuitry that a single failure within the power and control aspects will not prevent reclosure and isolation of the head vent system when required. Head vents are normally closed. Opening of the Reactor Head Vents is expected only during accident response to vent non-condensibles from the RCS or venting the reactor during startup. The size of the vent is designed to vent a volume equal to one half the RCS volume in one hour. However, a flow restricting orifice limits the flow from a pipe rupture or inadvertent opening to less than capability of the reactor coolant makeup system. Therefore, even if the vent path leaked or was opened at power, and no mitigating actions were taken, flow through the line would be within the normal capacity of the charging system. This will minimize the challenges to the emergency core cooling system (ECCS) since the leakage or inadvertent opening of the vent would not require ECCS actuation.

The Salem Technical Specifications do not currently address the operability of the Reactor Vessel Head Vent. Inclusion of this proposed amendment would impose an additional limitation and more stringent requirements not presently included in the Technical Specifications with respect to the Reactor Vessel Head Vents. This proposed change is comparable to the Technical Specification wording suggested in Generic Letter No. 83-37.

- b. The possibility of an accident or malfunction of a different type than any evaluated previously in the safety analysis will not be created. This assessment was made by the Commission on a generic basis during their consideration of the requirement for reactor head vents.

The Reactor Vessel Head Vent system conforms to the requirements of Appendices A and B of 10CFR50. The system does not change plant operation to create a different type of accident. The head vent system will be remotely operable from the control room and will not aggravate the challenge to containment during the course of any accident.

- c. The margin of safety as defined in the basis for any Technical Specification is not reduced.

This proposed change will both ensure the availability of the Reactor Vessel Head Vents and maintain the capability to ensure reactor coolant pressure boundary integrity in the event of inoperability of PORVs. An operable Reactor Vessel Head Vent system allows for more effective mitigation of postulated accidents in which non-condensable gases might accumulate in the reactor vessel. The system is designed to ensure a low probability of inadvertent or irreversible actuation and a high probability of operating when needed.

The proposed inclusion of Reactor Vessel Head Vent conforms to Example ii of Amendments that are not likely to involve a significant hazards consideration in that they impose additional limitations, restrictions or control not presently included in the Technical Specification (Federal Register Vol. 48, No. 67, April 6, 1983).

Based on the above evaluation, we have determined that the proposed change does not involve a significant hazards consideration.