

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

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

Gentlemen:

REPORTABILITY OF POPS EVENTS  
SALEM GENERATING STATION  
UNIT NOS. 1 AND 2  
DOCKET NOS. 50-272 AND 50-311

The purpose of this letter is to request agreement with an interpretation of Technical Specification 3.4.10.3, "Overpressure Protection Systems". This specification requires that any actuation of the Pressurizer Overpressure Protection System (POPS) be reported to the NRC via a special report. Several times in the past, a special report has been required as a result of normal plant operating procedures. This occurs during plant fill-and-vent operations following draindowns for refueling or other reasons. During the fill-and-vent process, plant procedures require "bumping" the Reactor Coolant Pumps (RCPs) to circulate trapped gasses to the reactor high points for venting. The pressure surge from the "bumping" operation has caused actuation of the POPS. This actuation is caused by the initial surge of the RCS coolant in the non-vented, non-solid system. The RCS fill and vent procedure contains an advisory that this operation may result in a POPS actuation.

PSE&G has investigated the potential for expanding the operational band to alleviate this problem. Currently, the POPS lift setpoint is 375 psig and cannot be increased without reducing the safety margin incorporated into the calculations. Likewise, the RCP operation limit, 325 psig, cannot be reduced due to pump seal concerns.

PSE&G believes that the intent of the reporting requirement is to advise the NRC and industry of significant operational events that challenge the integrity of the Reactor Vessel and that require actuation of the POPS to mitigate these events, and was not intended to cover planned and self limiting operations such as occur during the fill-and-vent procedure. PSE&G believes that the issuance of a special report under these planned and self limiting circumstances is not warranted. This position is

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supported by NUREG 1022, Appendix C in an example that stated if a trip was part of the preplanned sequence during testing or operation then it need not be reported. This is similar to the situation described above in that the activation of the POPS is anticipated and addressed in plant operating procedures.

Should you have any questions, please feel free to contact us.

Sincerely,

Handwritten signature of S. E. Miltonberger in cursive script.

C Mr. J. C. Stone  
Licensing Project Manager

Ms. K. Halvey Gibson  
Senior Resident Inspector

Mr. W. T. Russell, Administrator  
Region I

Mr. Kent Tosch, Chief  
New Jersey Department of Environmental Protection  
Division of Environmental Quality  
Bureau of Nuclear Engineering  
CN 415  
Trenton, NJ 08625