

Public Service  
Electric and Gas  
Company

Steven E. Miltenberger

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Vice President and Chief Nuclear Officer

September 28, 1989

NLR-N89163

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

Gentlemen:

REQUEST FOR AMENDMENT  
FACILITY OPERATING LICENSE 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, Public Service Electric and Gas Company (PSE&G) hereby transmits a request for amendment of Facility Operating License DPR-70 and DPR-75 for Salem Generating Station (SGS), Unit Nos. 1 and 2. Pursuant to the requirements of 10CFR50.90(b)(1), a copy of this request has been sent to the State of New Jersey as indicated below.

The proposed change requests modifications of the RHR open permissive setpoint to reflect operation of the system after removal of the RHR auto-closure interlock. The proposed change for Unit 2 has been prepared using the previously approved auto-closure interlock deletion page (Amendment 95/71). This page is not effective until startup from the upcoming Unit 2 fifth refueling outage. Likewise, the proposed Unit 2 change, if approved, should not be effective until startup from the fifth refueling outage since the two changes are related. The Unit 1 change can be implemented within 45 days of approval, allowing for setpoint and procedural changes. Since this change can be viewed as administrative in that it modifies an existing requirement in a conservative direction, PSE&G believes that the proposed change corresponds to a Category 2 change and should not require extensive special technical review.

Attachment 1 contains further discussion and justification for the proposed revisions. Attachment 2 is a markup of the existing Technical Specifications to reflect the as requested version of the specifications. Attachment 3 is a retype of the Technical Specifications to represent the proposed revision of these pages.

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This submittal includes one (1) signed original, including affidavit, and thirty-seven (37) copies pursuant to 10CFR50.4(b)(2)(ii).

Should you have any questions on the subject transmittal, please do not hesitate to contact us.

Sincerely,



Attachments

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

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

S. 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 28, 1989, concerning the Salem Generating Station, Unit Nos. 1 and 2, are true to the best of my knowledge, information and belief.

*S. Miltenberger*

Subscribed and Sworn to before me  
this 28th day of September, 1989

*Vanita M. Marshall*  
Notary Public of New Jersey

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

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

## ATTACHMENT 1

### Description of Change

Change Surveillance Requirement 4.5.2.i for Salem 1 and 2 to require testing the Residual Heat Removal (RHR) open permissive interlock(OPI) at 375 psig or greater versus the current requirement of 580 psig or greater.

### Reason and Justification for Change

Surveillance Requirement 4.5.2.i requires that the automatic interlock function of the Residual Heat Removal (RHR) system be verified within seven (7) days prior to placing the RHR system into service for cooling the Reactor Coolant System (RCS). This is currently done with a test signal corresponding to a reactor coolant pressure of 580 psig or greater and verifying that the RHR1 and RHR2 valves cannot be opened. The autoclosure interlock circuitry was removed from Salem Unit 1 and is being removed from Salem Unit 2 via Amendments 95/76. The open permissive interlock (OPI) circuitry will remain in place. To more adequately test the OPI, it is requested that Surveillance Requirement 4.5.2.i be revised to lower the test pressure to "375 psig or greater".

This change will allow for a more accurate verification of the open permissive interlock function of RHR on Salem Units 1 and 2 and will eliminate the possibility of confusion generated by utilizing a test pressure that does not directly correlate to system parameters and/or setpoints. The open permissive interlock prevents opening of the RH1 and RH2 valves while the RCS pressure is above 375 psig. This prevents damage to RHR piping and components. The current test pressure of 580 psig correlates to the automatic closure interlock which has been deleted from Salem Unit 1 and is being deleted from Salem Unit 2 during the upcoming refueling outage. The remaining OPI has a setpoint of 375 psig. By lowering the test signal requirement to 375 psig or greater, the OPI would more accurately be verified prior to initiating RHR. The test signal would then be consistent with the requirements of the UFSAR which prohibits operation of the RHR above 375 psig. The setpoint would also be consistent with the setpoint of the RHR relief valves, which is also designed to protect the RHR system from overpressurization. This would ensure consistency between all relevant plant documents.

### Significant Hazards Consideration

The proposed change does not involve a significant hazards consideration because operation of Salem Generating Station Units 1 and 2 in accordance with this change would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

Lowering the test signal pressure is a move in a conservative direction. This more adequately tests the OPI and is consistent with the FSAR which prohibits the operation of the RHR system until reactor pressure is 375 psig and the temperature is 350<sup>o</sup>F or less.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The open permissive interlock serves the purpose of not allowing the opening of RH1 and RH2 until the reactor pressure drops below the specified setpoint. The proposed change more adequately tests this interlock and therefore could not create the possibility of a new or different kind of accident.

- (3) Involve a significant reduction in a margin of safety.

Since the lowering of the test signal pressure is a move in the conservative direction, overall safety has been increased, and the margin of safety as defined in the bases of the Technical Specifications is maintained.

#### Conclusion

Based on these considerations, Public Service Electric and Gas Company has determined that this change does not involve a significant hazards consideration.