

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

October 20, 1989

NLR-N89208

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

Gentlemen:

REQUEST FOR AMENDMENT  
SALEM GENERATING STATION  
UNIT NOS. 1 AND 2  
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75  
DOCKET NOS. 50-272 AND 50-311

In accordance with the requirements of 10CFR50.90, Public Service Electric and Gas Company (PSE&G) hereby transmits a request for amendment of Facility Operating Licenses DPR-70 and DPR-75 for Salem Generating Station, Unit Nos. 1 and 2, respectively. In accordance with 10CFR50.91 (b) (1) requirements, a copy of this request has been sent to the State of New Jersey.

The proposed change modifies Technical Specification Section 4.0.2 and the associated Bases, to remove the 3.25 surveillance limit. This change is consistent with the guidance provided in Generic Letter 89-14. The Generic Letter encouraged licensees to amend plant Technical Specifications consistent with the guidance provided. This amendment request is therefore deemed to be a Category 2 change.

Attachment 1 includes a description, justification and significant hazards analysis for the proposed change. Attachment 2 contains the Technical Specification pages revised with pen and ink changes. Attachment 3 contains the Technical Specification pages with the changes incorporated.

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

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

Sincerely,



Attachment

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 )

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 October 20, 1989, concerning the Salem Generating Station, Unit Nos. 1 and 2, are true to the best of my knowledge, information and belief.

Steven E. Miltenberger

Subscribed and Sworn to before me  
this 20th day of October, 1989

Vanita M. Marshall  
Notary Public of New Jersey

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

ATTACHMENT 1

LCR 89-13

PROPOSED LICENSE CHANGE  
SALEM GENERATING STATION  
UNIT NOS. 1 AND 2  
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75  
DOCKET NOS. 50-272 AND 50-311

I. Description of Change

In accordance with the guidance provided in NRC Generic Letter 89-14, Technical Specification Section 4.0.2 is modified to remove the 3.25 limit. The associated Bases Section is updated to reflect this change.

II. Reason for the Change

The removal of the 3.25 limit provides greater flexibility for the use of the provision for extending surveillance intervals, reduces the administrative burden associated with its use, and has a positive effect on safety. The NRC encourages licensees to modify their Technical Specifications consistent with the guidance provided in Generic Letter 89-14. The suggested changes have been reviewed by PSE&G and are considered an improvement to the Salem Generating Station Technical Specifications.

III. Justification for Change

The NRC staff has concluded that the removal of the 3.25 limit from Specification 4.0.2 results in a greater benefit to safety than limiting the use of the 25% allowance to extend surveillance intervals. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Several Technical Specifications require surveillances be performed during a plant shutdown. When a limit is reached on extending the surveillance interval, a forced plant shutdown to perform these surveillances is generally the only alternative short of a license amendment that defers the performance of the surveillance until the end of the fuel cycle. A forced shutdown to perform these surveillances is not justified from a risk standpoint to avoid exceeding the 3.25 limit when exceeding these surveillances is within the 25% allowance. Some surveillances are designed to be performed during a refueling outage when the plant is in a desirable condition for conducting these surveillances, the risk of performing some of these surveillances during plant operation is greater than the impact on safety of exceeding the 3.25 limit and using the 25% allowance to extend these surveillances. The safety benefit of performing these surveillances during a plant shutdown is that systems do not have to be removed from service at a time that they are required to be operable. Also, there is

the administrative burden associated with tracking the use of the 25% allowance to ensure compliance with the 3.25 limit. On the basis of these considerations, the removal of the 3.25 limit will have an overall positive impact on safety.

#### IV. Significant Hazards Consideration

The proposed changes to the Technical Specifications:

1. Do not involve a significant increase in the probability or consequence of an accident previously evaluated.

As stated in Generic Letter 89-14, the removal of the 3.25 limit from Specification 4.0.2 results in a greater benefit to safety than limiting the use of the 25% allowance to extend surveillance intervals. Therefore, it may be concluded that the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not adversely affect the design or operation of any system or component important to safety. No physical plant modifications or new operational configurations result from this change.

Therefore, it may be concluded that the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does not involve a significant reduction in a margin of safety.

As stated in Generic Letter 89-14, the use of the allowance to extend surveillance intervals by 25% can result in a significant safety benefit. This safety benefit is obtained when a surveillance interval is extended at a time when conditions are not suitable for performing the surveillance. The safety benefit of allowing the use of the 25% allowance to extend a surveillance interval outweighs any benefit derived by limiting three (3) consecutive surveillance intervals to the 3.25 limit.

Therefore, it may be concluded that the proposed change does not involve a significant reduction in a margin of safety.

V. Conclusions

Based on the guidance provided in Generic Letter 89-14, PSE&G has concluded that the proposed change conforms to this guidance and thus satisfies the criteria for a no significant hazards consideration.

ATTACHMENT 2