

Public Service
Electric and Gas
Company

Steven E. Miltenberger

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Vice President and Chief Nuclear Officer

NOV 14 1989
NLR-N89210

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

REQUEST FOR AMENDMENT, REVISION 3
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.

On August 29, 1989, PSE&G submitted an Emergency License Change Request for temporary relief to the requirements of Technical Specification sections 6.2.2.g and 6.3.1. The request was submitted to permit a specific individual to assume the active duties of the Operations Manager, without currently holding a Senior Reactor Operator (SRO) license, for a period of 18 months. Revision 1 to this License Change Request was transmitted on August 31, 1989, to clarify the time frame for the designated candidate obtaining a SRO license. Revision 2 was transmitted on October 11, 1989, to remove the "Emergency" status associated with previous versions of this request, and was a permanent change as opposed to temporary relief. Based on further discussions with Mr. J. Stone, the NRC Project Manager for Salem Generating Station, we are transmitting Revision 3 to this request. This revision removes two of the four previously requested alternative conditions for an individual to fill the position of Operations Manager, and clarifies one condition by specifying the type of "have held" license acceptable.

This revision also removes the previous reference to the (2) Operating Engineers being assigned "one per each unit", since this limits our ability to implement short-term organizational changes. Some examples of anticipated situations that would not support unitized Operating Engineers are provided to illustrate our point.

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1. While either Operating Engineer is attending Licensed Operator Requalification, the remaining Operating Engineer would be responsible for both Salem units.
2. During vacation periods, the remaining Operating Engineer would be responsible for both Salem units.

PSE&G intends to utilize unitized Operating Engineers to the fullest extent practical, but wants to retain the flexibility to alter our normal alignment as situations dictate.

PSE&G believes that the proposed change includes adequate technical justification to conclude that a detailed specialist review should not be required and that the proposed change can be classified as 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).

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)

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 NOV 14 1989, concerning the Salem Generating Station, Unit Nos. 1 and 2, are true to the best of my knowledge, information and belief.

Stu E. Miltenberger

Subscribed and Sworn to before me
this 14th day of November, 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

LCR 89-11

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 the Change

Modify the present Technical Specification section 6.2.2.g to eliminate the Operations Manager as a position requiring a SRO license. Add a new Technical Specification section 6.2.2.h to specify the requirements for the Operations Manager.

II. Reason for the Change

Provide flexibility in implementing future management changes.

III. Justification for the Change

The Operations Department at Salem Generating Station is managed through an Operations Manager, (2) Operations Engineers and Shift Supervision. Technical Specifications presently require all of these individuals to hold a SRO license.

Current industry guidance on the selection, qualification and training of personnel for nuclear power plants (ANSI/ANS-3.1-1987), allows relaxation of the SRO license requirement for the Operations Manager position, provided certain conditions are met. This allows greater management flexibility while maintaining the high standards necessary to ensure safe and efficient operation of a nuclear power plant. PSE&G supports this philosophy and thus is requesting the enclosed license amendment.

An individual designated to fill the position of Operations Manager must satisfy one (1) of the following conditions:

- (1) Hold a SRO license.
- (2) Have held a SRO license for a similar unit (PWR).

These special requirements ensure that a selected candidate has demonstrated knowledge at the senior operator level, even though he may not hold a SRO license. Our present Operations Department Organization utilizes (2) Operating Engineers who are normally assigned the responsibility for overseeing the shift activities associated with a given Salem unit. Since the Operating Engineers are required to have a SRO license, the Operations Department licensed personnel (shift supervision and control room operators) are directly managed by an individual holding a SRO license.

Based on the specified knowledge requirements to fill the position of Operations Manager, and maintaining SRO licensed Operating Engineers, PSE&G believes that approving this amendment request will not adversely affect the safe operation of the Salem Generating Station.

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.

Any individual selected to fill the Operations Manager position will meet current industry guidance on the selection, qualification and training of personnel for nuclear power plants, as specified in the Technical Specifications. These requirements ensure that any candidate has demonstrated knowledge at the senior operator level.

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

The lack of a SRO license on the part of the Operations Manager, unlike a procedure or design change, is not a potential new accident precursor.

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. Do not involve a significant reduction in a margin of safety.

The Operations Department licensed personnel (shift supervision and control room operators) will continue to be directly managed by an individual holding a SRO license (Operating Engineer).

Unlicensed candidates selected for the Operations Manager position must meet the education, experience and training requirements of ANSI N18.1-1971 and have held a SRO license for a similar unit (PWR).

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 information presented above, PSE&G has concluded that the proposed changes satisfy the criteria for a no significant hazards consideration.

ATTACHMENT 2