

Public Service
Electric and Gas
Company

Stanley LaBruna

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Vice President - Nuclear Operations

December 27, 1989

NLR-N89211
LCR 89-12

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 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 (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 relaxed reportability requirements for the reactor trip breaker and reactor trip bypass breaker surveillance testing.

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 contains further discussion and justification for the proposed revision. Attachment 2 is a markup of the existing Technical Specifications to reflect the requested changes.

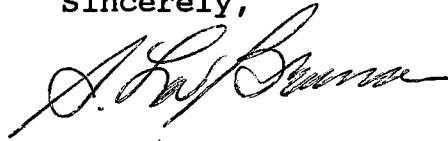
PSE&G has reviewed the implementation requirements for the proposed amendment and requests a 60 day period from amendment approval to implementation.

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Should you have any questions on this 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

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

S. LaBruna, being duly sworn according to law
deposes and says:

I am Vice President - Nuclear Operations of Public Service
Electric and Gas Company, and as such, I find the matters set
forth in our letter dated _____, concerning the
Salem Generating Station, Unit Nos. 1 and 2, are true to the best
of my knowledge, information and belief.



Subscribed and Sworn to before me
this 27th day of December, 1989



Notary Public of New Jersey

DELORIS D. HADDEN
A Notary Public of New Jersey
My Commission Expires March 14, 1990

My Commission expires on _____

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

Revise Salem Unit 1 and 2 Technical Specifications 3.3.1 Table 3.3-1, by removing the Table Notation ### reporting requirement.

This modification eliminates the "immediate" NRC notification requirement for reactor trip breakers (RTB) and reactor trip bypass breakers exceeding any procedural acceptance criteria, or trip forces exceeding the recommended upper limit. Reportability would continue as required under the provisions of 10CFR50.72 and 50.73.

II. Reason for the Proposed Change

Salem Units 1 and 2 are presently required to immediately report surveillance test failures for the RTBs and bypass breakers. The requirement goes beyond the established reporting requirements of 10CFR50.72 and 50.73. This results in the reporting of conditions which, to date, have no impact on breaker operability. As such, the reliability of the Salem RTBs is inappropriately perceived as being below industry standards.

III. Justification for the Proposed Change

Following the Salem ATWS events of February 22 and 25, 1983, PSE&G implemented extensive revisions to the maintenance and surveillance procedures associated with the reactor trip and reactor trip bypass breakers. Since many of these procedural changes were prototypical in nature, they were broad in scope and contained very conservative test and acceptance criteria. Additionally, because of the safety significance of these events, the NRC imposed conservative reportability requirements to ensure timely notification of hardware related deficiencies. These additional reporting requirements were subsequently incorporated into the Salem Unit 1 and 2 Technical Specifications.

GL 83-28 established industry wide required actions based on the generic implications of the Salem ATWS events. These actions addressed issues related to reactor trip system reliability and general management capability. The GL did not impose additional reporting requirements beyond those already in existence.

10CFR50.72 was established to promulgate immediate notification requirements for any plant condition presenting a clear challenge to safe operation. Subsequent revisions have further defined those significant events where immediate NRC action to protect the public health and safety may be required or where the NRC needs accurate and timely information to respond to heightened public concern. Thus, the present version of 10CFR50.72 clearly addresses the immediate reporting requirements associated with any significant RTB deficiency.

The principal issue that led to the establishment of the Salem Unit 1 and 2 Technical Specification immediate notification requirements was questionable RTB reliability. Subsequent to the implementation of enhanced maintenance/surveillance procedures, Salem has conducted approximately 95 separate surveillances on the RTBs and bypass breakers. There have been no instances of any breaker failing to meet its design safety function (tripping open) under normal operating conditions (no additional weight on the breaker trip bar). This data supports the elimination of Salem specific Technical Specification immediate notification requirements.

PSE&G is not requesting the elimination of all reporting requirements. Breakers and components not meeting specified operability criteria would be reported under 10CFR50.72 and 50.73 as appropriate.

IV. Significant Hazards Analysis Consideration

The proposed changes to the Technical Specifications:

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

The proposed changes do not affect the present level of breaker surveillance testing or maintenance. Breakers failing to satisfy the specified surveillance acceptance criteria will require appropriate action as indicated in the Technical Specifications.

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

The present margin of safety is maintained, since breaker maintenance and surveillance testing is unaffected. The proposed change only affects the reporting of failures, by replacing the Technical Specification immediate notification requirement with the normal NRC reporting mechanisms specified in 10CFR50.72.

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 change satisfies the criteria for a no significant hazards consideration.

ATTACHMENT 2