Public Service
Electric and Gas
Company

**Stanley LaBruna**

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JUN 2 0 1991

NLR-N91064
LCR 91-05

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

Gentlemen:

REQUEST FOR AMENDMENT
ECCS ACCUMULATORS
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 amendment modifies Technical Specification section 3.5.1, surveillance requirement 4.5.1.c. The current surveillance requires verification that power to the safety injection accumulator isolation valves is disconnected by removal of the breaker from the circuit. The control power lockout switches were recently modified to provide the necessary protection against single active failure, thus removal of the breaker from the circuit is unnecessary.

The proposed amendment also modifies the applicability of surveillance requirement 4.5.1.c to agree with the applicability of the specification. The current applicabilities are inconsistent with each other.

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

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We request that the implementation date be established at 60 days following issuance of the approved License Amendment. Should you have any questions regarding this transmittal, please feel free to contact us.

Sincerely,

Stewart E. Miltenberger
for SCB

Attachments (2)

C Mr. J. C. Stone
Licensing Project Manager

Mr. T. Johnson
Senior Resident Inspector

Mr. T. Martin, 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

REF:NLR-N91064

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 , 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 20 day of June, 1990

Elizabeth J. Kidd
Notary Public of New Jersey

ELIZABETH J. KIDD
Notary Public of New Jersey
My Commission Expires April 25, 1995

My Commission expires on 4/25/95

Attachment 1

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PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS
SALEM UNIT NOS. 1 AND 2

TITLE OF TECHNICAL SPECIFICATION

I. Description of Change

a. Modify Technical Specification surveillance requirement 4.5.1.c to delete the requirement to remove the circuit breakers from the circuit.

b. Modify Technical Specification surveillance requirement 4.5.1.c to state when the RCS pressure is greater than 1000 psig.

II. Reason for the Change

a. The safety injection accumulator isolation valves control circuits contain power lockout switches. These switches disconnect power to the valve actuator.

As previously reported to the NRC, design changes 1EC-2295 and 2EC-2295 modified the control circuits to install interposing relays. An error in this design change introduced a potential single failure in the closing circuit. Design changes 1SC-2272 and 2SC-2272 modified the closing circuit to eliminate the potential single failure. Completion of these design changes has eliminated the need to remove the breakers from the circuit.

The modified closing circuits meet single failure criteria and equire two independent operator actions to close the valve: operating the power lockout switch and depressing the close pushbutton. Removing the breaker from the circuit is an unnecessary requirement that could cause a significant delay if it becomes necessary to close the accumulator outlet valves.

b. The surveillance requirement is being changes from 2000 psig to 1000 psig to assure compliance with the applicability of Technical Specification 3.5.1.

III. Justification for the Change

a. Safety Injection accumulator power operated outlet valves do not require removal of the breaker from the circuit to prevent single active failure. The control power lockout switch installed in each valve's closing circuit provides protection against a single failure causing an inadvertent closure during the injection phase.

Two positive operator actions are necessary to close the valve: operation of the power lockout switch and operation of the close pushbutton.

The breakers are located in the Auxiliary Building which is remote from the Control Room. It would be necessary to dispatch an equipment operator to rack in the breaker to operate the valve. Should it become necessary to close the valve, this could cause a delay.

Maintaining the breaker closed with power removed by the lockout switch will not alter the system or functions as described in the UFSAR sections 7.3.2.6 and 7.3.2.7 or in the Technical Specification Basis section 3/4.5.1.

b. Changing the surveillance requirement from 2000 psig to 1000 psig will ensure the surveillance is performed whenever the specification is applicable. This is an administrative change that corrects an apparent typographical error.

IV. Significant Hazards Consideration

In accordance with 10CFR50.92, PSE&G has reviewed the proposed changes and concluded the proposed changes do not involve a significant hazards consideration because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously analyzed.

a. The proposed deletion of the surveillance requirement to remove the breaker from the circuit for the safety injection accumulator isolation valves would not affect the accident analysis. The control power lockout switches provide protection against a single active failure and two operator actions would be required to close the valve. Therefore, would not increase the probability or consequences of a previously analyzed accident.

b. The proposed change is an administrative change to correct an apparent typographical error. Therefore, it would not increase the probability or consequences of a previously analyzed accident.

2. Create the possibility of a new or different kind of accident.

a. The control power lockout switches protect against a single active failure and two operator actions would be required to close the valve. Deletion of the requirement to remove the breaker from the circuit will not introduce any new failure modes. Therefore, there can be no impact on plant response to the point where a different accident is created.

b. The proposed change is an administrative change to correct an apparent typographical error. Therefore, there can be no impact on plant response to the point where a different accident is created.

3. Involve a significant reduction in a margin of safety.

a. The control power lockout switch will provide the protection currently being provided by removing the breaker from the circuit. The proposed change will delete the requirement to remove the breaker from the circuit, but will still require verification of the power lockout switch position every 31 days when reactor coolant system pressure is greater than 1000 psig. Therefore, there is no reduction in any margin of safety.

b. The proposed change is an administrative change to correct an apparent typographical error. Therefore, there can be no reduction in any margin to safety.

V. Conclusions

Based on the information presented above, PSE&G has concluded there is no significant hazards consideration.

ATTACHMENT 2