



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

July 24, 1992

Docket Nos. 50-272  
and 50-311

Mr. Steven E. Miltenberger  
Vice President and Chief Nuclear  
Officer  
Public Service Electric and Gas  
Company  
Post Office Box 236  
Hancocks Bridge, New Jersey 08038

Dear Mr. Miltenberger:

SUBJECT: STAFF REVIEW OF GENERIC LETTER 90-06, "RESOLUTION OF GENERIC ISSUE 70, 'POWER-OPERATED RELIEF VALVE AND BLOCK VALVE RELIABILITY,' AND GENERIC ISSUE 94, 'ADDITIONAL LOW-TEMPERATURE OVERPRESSURE PROTECTION FOR LIGHT-WATER REACTORS,' PURSUANT TO 10 CFR 50.54(f)", SALEM NUCLEAR GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M77374, M77375, M77447 AND M77448)

By letters dated December 21, 1990 and June 20, 1991, Public Service Electric and Gas Company (PSE&G), responded to Generic Letter 90-06. The generic letter represented the technical resolution of two generic issues and included plant backfits which were cost-justified safety enhancements. Generic Issue 70 included upgrades in quality requirements, inservice testing requirements, and modified technical specifications for all pressurized water reactor facilities that incorporate PORVs and block valves in their design. The intended purpose was to enhance the overall reliability of the PORVs and block valves so that they could better perform the safety functions identified in the generic letter. Generic Issue 94 included modified technical specifications for all Westinghouse and Combustion Engineering facilities to reduce the allowed outage time for an inoperable LTOP channel and thus reduce the probability of overpressurization events during shutdown conditions.

The staff has reviewed your submittals and finds that you have deviated from the model technical specification included in the generic letter. It is the staff's position that a regulatory analysis has been performed in accordance with 10 CFR 50.109(a)(3) and 50.109(c) which justifies the backfit. Therefore, absent any information that demonstrates that your facility is not bounded by the regulatory analysis that accompanied the generic letter, you are requested to resubmit a response that is in keeping with the intent of the generic letter. The specific areas of concern are as follows.

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July 24, 1992

As discussed in NUREG-1316, most of the safety enhancement for the proposed backfit is derived from the increase in feed and bleed capability. Therefore, for those facilities that can accomplish the three safety functions identified in the generic letter without relying on PORVs for the feed and bleed function, the allowed outage time (AOT) for an inoperable PORV (for reasons other than excessive leakage) may be increased from the recommended 72 hours to 7 days. The staff's position is that a change in allowed outage times based solely on a PRA argument is not acceptable. Only differences in plant hardware relative to that assumed in the staff's cost/benefit analysis will be considered.

Therefore, based on the additional guidance provided above, you are requested to resubmit your response to the generic letter within 60 days following receipt of this letter.

If you would like to further discuss these issues prior to your resubmittal, please feel free to contact me.

Sincerely,

/s/

James C. Stone, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

cc: See next page

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Mr. Steven E. Miltenberger

- 2 -

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Sincerely,



James C. Stone, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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