

Public Service
Electric and Gas
Company

Stanley LaBruna

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-1200

Vice President - Nuclear Operations

AUG 14 1992
NLR-N92010
LCR 91-12

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 amendment modifies Technical Specification 3/4.3.2, Engineered Safety Feature Actuation System Instrumentation, Limiting Conditions for Operation, Action Requirements, and Surveillance Requirements including associated tables. The amendment includes administrative changes, provides consistency between Salem Unit 1 and Salem Unit 2, and ensures technical accuracy.

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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Due to the extensive number of procedure and reference changes, PSE&G requests a 120 day implementation period after amendment approval.

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

Sincerely,



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


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 the above referenced letter, concerning the Salem Unit Generating Stations, Nos. 1 and 2, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 14 day of August, 1992


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

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

REACTOR PROTECTION SYSTEM INSTRUMENTATION

I. Description of Change

Modify Technical Specification 3/4.3.2 as indicated below to provide consistency between the units, to address various administrative discrepancies, and ensure technical accuracy. All changes are applicable to both units unless noted otherwise.

- A. Renumber Limiting Condition for Operation (LCO) 3.3.2 and Surveillance Requirements 4.3.2.1, 4.3.2.2, and 4.3.2.3 as 3.3.2.1, 4.3.2.1.1, 4.3.2.1.2, and 4.3.2.1.3 respectively. (UNIT 2 ONLY)
- B. TABLE 3.3-3, ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION
- B1. Functional Units 1e, 1f and 4d. Remove all references to three and four loop operation. Remove three loop operation line items. Change Action 15 to read: "NOT USED". (UNITS 1 AND 2)
- Remove Table Notation ###. (UNIT 1 ONLY)
- B2. Functional Unit 1f. Change T_{avg} --Low-Low CHANNELS TO TRIP to read: "1 T_{avg} in any 2 Loops". (UNIT 1 ONLY)
- Functional Unit 1f. Change Steam Line Pressure-Low CHANNELS TO TRIP to read: "1 pressure any 2 loops". (UNITS 1 AND 2)
- B3. Functional Unit 3c. Change title to Containment Ventilation Isolation. Renumber 3c2 as 3c3. Change 3c3 to read: "Containment Atmosphere Gaseous Radioactivity-High. Add new 3c2 "Automatic Actuation Logic". (UNIT 1 ONLY)
- B4. Functional Unit 4a. Change TOTAL NO. OF CHANNELS to 2/steam line. Change MINIMUM CHANNELS OPERABLE to 1/operating steam line. Change ACTION to from 18 to 23. Insert new Action 23. (UNIT 1 ONLY)
- Change ACTION from 21 to 23. (UNIT 2 ONLY)

- B5. Functional Unit 4b. Change ACTION from 13 to 20.
Change Notation *** to reference ACTION 20. (UNIT 1 ONLY)
- Notation ***. Move to Table Notations page.
(UNITS 1 AND 2)
- B6. Functional Unit 4d. Add APPLICABLE MODES " 1,2,3##" to
Steam Flow in Two Steam Lines-- High. (UNITS 1 AND 2)
- B7. Functional Unit 8b. Change ACTION from 23 to 22.
(UNIT 2 ONLY)
- B8. Functional Unit 8c.i and 8c.ii. Change MINIMUM CHANNELS
OPERABLE to "2/steam generator. (UNITS 1 AND 2)
- Functional Unit 8c. item i. Change CHANNELS TO TRIP to
2/steam generator any steam generator. item ii. Change
CHANNELS TO TRIP to 2/steam generator any 2 steam
generators. Functional Unit 8d. Change TOTAL NO. OF
CHANNELS to read: "4-1/bus". (UNIT 1 ONLY)
- B9. Functional Unit 8f, Change title to "Trip of Main Feedwater
Pumps Start Motor-Driven Pumps. Change TOTAL NO. OF
CHANNELS to "2/pump. Change CHANNELS TO TRIP to "1/pump.
Change MINIMUM CHANNELS OPERABLE to" 1/pump. Change
APPLICABLE MODES to "1,2". (UNIT 1 ONLY)
- B10. Functional Unit 8f. Change ACTION from 21 to 21*.
(UNIT 1 ONLY)
- Functional Unit 8f. Change ACTION from 22* to 21*.
Action 21. Insert new Action 21. (UNIT 2 ONLY)
- B11. Functional Unit 8g. Add station Blackout. (UNIT 2 ONLY)
- B12. Notation **. Reword to read "Applies to Functional Unit 8,
items c and d." Move to Table Notation page.
(UNITS 1 AND 2)
- B13. Footnote. Delete footnote concerning effective date.
(UNIT 2 ONLY)
- B14. Table Notation #. Delete "Pressurizer Pressure Block of
Safety Injection) setpoint." Table Notation ##. Delete
"T_{avg} Block of Safety Injection) setpoint." (UNIT 2 ONLY)
- B15. Actions 13, 16, 19b. Change referenced specification to
4.3.2.1.1. (UNIT 2 ONLY)

- B16. Engineered Safety Features Interlocks Table. Relocate to the end of all Actions. (UNITS 1 AND 2)

Action 21. Change Steam Generator Feedwater Pump to Main Feedwater Pump. (UNIT 1 ONLY)

Actions. Delete Action 22. Renumber Action 23 as Action 22. Renumber Action 21 as Action 23. (UNIT 2 ONLY)

- B17. Action 20. Change to read: "...one channel may be bypassed for up to 1 hour for surveillance testing provided the other channel is OPERABLE." (UNIT 1 ONLY)

C. TABLE 3.3.4, ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SETPOINTS

- C1. Functional Unit 3c. Add Automatic Actuation Logic. (UNIT 1 ONLY)

Functional Unit 8. Add new item g. Station Blackout. (UNIT 2 ONLY)

- C2. Functional Unit 3c. Renumber item 2 as item 3. (UNITS 1 AND 2)

- C3. Functional Unit 8f. Change Title to read: "Trip of Main Feedwater Pumps." (UNIT 1 ONLY).

D. TABLE 4.3-2, ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

- D1. Functional Unit 1f. Change Title to read: "Steam Flow in Two Lines --High Coincident with T_{avg} --Low-Low or Steam Line Pressure Low. Functional Unit 8f. Change Title to read: "Trip of Main Feedwater Pumps." (UNIT 1 ONLY)

Functional Unit 3c3. Change title to read: "Containment Atmosphere Gaseous Radioactivity -- High". (UNITS 1 AND 2)

Functional Unit 4d. Change Title to read: "Steam Flow in Two Lines --High Coincident with T_{avg} --Low-Low or Steam Line Pressure Low. (UNITS 1 AND 2)

- D2. Functional Unit 6a. Change CHANNEL FUNCTIONAL TEST to M(6). Table Notations. Add new notation 6 to read: "Inputs from undervoltage, Vital Bus, shall be tested monthly. Inputs from Solid State Protection System, shall be tested every 62 days on a STAGGERED TEST BASIS." (UNITS 1 AND 2)

- D3. Functional Unit 6b. Add * following Description and note on Table Notations page to read: "* - Outputs are up to, but not including, the output relays."
- D4. Functional Unit 8. Add new item g, Station Blackout.
(UNIT 2 ONLY)
- D5. Functional Unit 8b. Manual Initiation. Change CHANNEL FUNCTIONAL TEST notation to (5). Table Notations. Renumber Note (4) to Note (5). Add new Note (4) to read, "NOT USED".
(UNIT 1 ONLY)

II. Reasons and Justifications for the Changes

- A. Renumbering LCO and Surveillance Requirements. (UNIT 2 ONLY)

This is an editorial change to be consistent with Salem Unit 1 and to be more consistent with other specifications in the Salem Unit 2 Instrumentation Chapter.

- B1. Functional Units 1e, 1f and 4d. Remove all references to three and four loop operation. Remove three loop operation line items. Change Action 15 to read: "NOT USED".
(UNITS 1 AND 2)

Remove Table Notation ###. (UNIT 1 ONLY)

This is an editorial change to remove all references to three and four loop operation. Table Notation ### and Action 15 are unnecessary and deleted. The current Salem Accident Analysis does not support three loop operation. Three loop operation is not permitted at Salem.

- B2. Functional Unit 1f. Change T_{avg} --Low-Low CHANNELS TO TRIP to read: "1 T_{avg} in any 2 Loops". (UNIT 1 ONLY)

Functional Unit 1f. Change Steam Line Pressure-Low CHANNELS TO TRIP to read: "1 pressure any 2 loops".
(UNITS 1 AND 2)

These changes are editorial and consistent with the same description in other functional units.

- B3. Functional Unit 3c. Change title to Containment Ventilation Isolation. Renumber 3c2 as 3c3. Change 3c3 to read: "Containment Atmosphere Gaseous Radioactivity-High. Add new 3c2 "Automatic Actuation Logic". (UNIT 1 ONLY)

Rewording and Renumbering titles are editorial changes to improve the clarity and consistency of the specification. Adding the new specification 3c2 is an administrative change to make Table 3.3-3 consistent with Table 4,3-2 and Unit 2. This information was omitted previously.

- B4. Functional Unit 4a. Change TOTAL NO. OF CHANNELS to 2/steam line. Change MINIMUM CHANNELS OPERABLE to 1/operating steam line. Change ACTION to from 18 to 23. Insert new Action 23. (UNIT 1 ONLY)

Change ACTION from 21 to 23. (UNIT 2 ONLY)

Changing the TOTAL NO. OF CHANNELS ensures that the specification is consistent with actual plant conditions. Adding steam line to the MINIMUM CHANNELS OPERABLE is an editorial change for clarity. The present ACTION requires the Unit to be taken two modes below the Mode of Applicability. Changing to Action 23, would take the Unit to one mode below the Mode of Applicability. Changing the referenced Action is editorial to address the new Action number.

- B5. Functional Unit 4b. Change ACTION from 13 to 20. Change Notation *** to reference ACTION 20. (UNIT 1 ONLY)

Notation ***. Move to Table Notations page. (UNITS 1 AND 2)

The present ACTION requires the Unit to be taken two modes below the Mode of Applicability. Changing to Action 20, would take the Unit to one mode below the Mode of Applicability. Changing the referenced Action is editorial to address the new Action number. Relocating the notation is administrative to provide clarity, by locating all notes on the same page.

- B6. Functional Unit 4d. Add APPLICABLE MODES " 1,2,3##" to Steam Flow in Two Steam Lines-- High. (UNITS 1 AND 2)

This is an administrative change to address information that had previously been omitted.

- B7. Functional Unit 8b. Change ACTION from 23 to 22. (UNIT 2 ONLY)

This is an administrative change to address the renumbering of the Actions.

- B8. Functional Unit 8c.i and 8c.ii. Change MINIMUM CHANNELS OPERABLE to "2/steam generator. (UNITS 1 AND 2)

Functional Unit 8c. item i. Change CHANNELS TO TRIP to 2/steam generator any steam generator. item ii. Change CHANNELS TO TRIP to 2/steam generator any 2 steam generators. (UNIT 1 ONLY)

Adding the "per" symbol corrects a previous typographical error. Adding "any Steam Generator" or "any 2 steam generators" ensures the specification is consistent with actual plant conditions. Changing the Total Number of Channels format is editorial to provide consistency between the units.

- B9. Functional Unit 8f, Change title to "Trip of Main Feedwater Pumps Start Motor-Driven Pumps. Change TOTAL NO. OF CHANNELS to "2/pump. Change CHANNELS TO TRIP to "1/pump. Change MINIMUM CHANNELS OPERABLE to " 1/pump. Change APPLICABLE MODES to "1,2". (UNIT 1 ONLY)

Changing the title is editorial to provide clarity and consistency between the units. Changing the criteria format is editorial to provide clarity and is consistent with Unit 2 terminology. Mode 2 is added to the Applicable Modes for consistency with Unit 2.

- B10. Functional Unit 8f. Change ACTION from 21 to 21*. (UNIT 1 ONLY)

Functional Unit 8f. Change ACTION from 22* to 21*. Action 21. Insert new Action 21. (UNIT 2 ONLY)

Adding the asterisk "*" to Action 21 provides an exemption to specification 3.0.4. for Trip of the Main Feedwater Pumps. Without the exemption, one inoperable Main Feedwater Pump would prevent the Unit from entering Mode 1. Two Main Feedwater Pumps are not required until greater than 50% Power.

Changing the Action from 22* to 21* applies a more conservative Action requirement, that is more accurate for the Emergency Trip of Main Feedwater Pumps circuitry. This change is consistent with Unit 1.

- B11. Functional Unit 8g. Add station Blackout. (UNIT 2 ONLY)

The added functional unit merely references other functional units within the Tables. The change is for completeness and is consistent with Unit 1.

- B12. Notation **. Reword to read "Applies to Functional Unit 8, items c and d." Move to Table Notation page.
(UNITS 1 AND 2)

Rewording the notation provides a more accurate reference to the applicable functional unit. Relocating the notation is administrative to provide clarity, by locating all notes on the same page.

- B13. Footnote. Delete footnote concerning effective date.
(UNIT 2 ONLY)

This change is administrative and deletes a footnote that is no longer necessary.

- B14. Table Notation #. Delete "Pressurizer Pressure Block of Safety Injection) setpoint." Table Notation ##. Delete "T_{avg} Block of Safety Injection) setpoint." (UNIT 2 ONLY)

This change is editorial to provide clarity. The change is consistent with Unit 1.

- B15. Actions 13, 16, 19b. Change referenced specification to 4.3.2.1.1. (UNIT 2 ONLY)

The change is administrative to reference the correct renumbered specifications.

- B16. Engineered Safety Features Interlocks Table. Relocate to the end of all Actions. (UNITS 1 AND 2)

Action 21. Change Steam Generator Feedwater Pump to Main Feedwater Pump. (Unit 1 ONLY)

Actions. Delete Action 22. Renumber Action 23 as Action 22. Renumber Action 21 as Action 23. (UNIT 2 ONLY)

These are editorial changes to provide clarity and consistency.

- B17. Action 20. Change to read: "...one channel may be bypassed for up to 1 hour for surveillance testing provided the other channel is OPERABLE." (UNIT 1 ONLY)

This is an administrative change to provide clarification and consistency with Unit 2.

- C1. Functional Unit 3c. Add Automatic Actuation Logic.
(UNIT 1 ONLY)

Functional Unit 8. Add new item g. Station Blackout.
(UNIT 2 ONLY)

These changes provide information that was previously omitted. These changes provide consistency between the units.

- C2. Functional Unit 3c. Renumber item 2 as item 3.
(UNITS 1 AND 2)

This is an editorial change to address proper numbering.

- C3. Functional Unit 8f. Change Title to read: "Trip of Main Feedwater Pumps." (UNIT 1 ONLY).

These are editorial changes to provide a more accurate description of the functional unit.

- D1. Functional Unit 1f. Change Title to read: "Steam Flow in Two Lines --High Coincident with T_{avg} --Low-Low or Steam Line Pressure Low. Functional Unit 8f. Change Title to read: "Trip of Main Feedwater Pumps." (UNIT 1 ONLY)

Functional Unit 3c3. Change title to read: "Containment Atmosphere Gaseous Radioactivity -- High". (UNITS 1 AND 2)

Functional Unit 4d. Change Title to read: "Steam Flow in Two Lines --High Coincident with T_{avg} --Low-Low or Steam Line Pressure Low. (UNITS 1 AND 2)

These are editorial changes to provide a more accurate description of the functional unit.

- D2. Functional Unit 6a. Change CHANNEL FUNCTIONAL TEST to M(6). Table Notations. Add new notation 6 to read: "Inputs from undervoltage, Vital Bus, shall be tested monthly. Inputs from Solid State Protection System, shall be tested every 62 days on a STAGGERED TEST BASIS." (UNITS 1 AND 2)

The proposed change references a new table notation that defines Safeguards Equipment Cabinet (SEC) input testing requirements. SEC inputs originate in the Protection System and Vital Bus Undervoltage channels. The new table notation defines testing requirements consistent with the testing requirements for the channels providing the inputs. This change is a clarification that reflects the existing equipment configuration.

- D3. Functional Unit 6b. Add * following Description and footnote on Table Notations page to read: "* - Outputs are up to, but not including, the output relays."

This change references a new table notation that defines the scope of testing. This note is added for clarification only.

These changes provide information that was previously omitted. These changes provide consistency between the units.

- C2. Functional Unit 3c. Renumber item 2 as item 3.
(UNITS 1 AND 2)

This is an editorial change to address proper numbering.

- C3. Functional Unit 8f. Change Title to read: "Trip of Main Feedwater Pumps." (UNIT 1 ONLY).

These are editorial changes to provide a more accurate description of the functional unit.

- D1. Functional Unit 1f. Change Title to read: "Steam Flow in Two Lines --High Coincident with T_{avg}--Low-Low or Steam Line Pressure Low. Functional Unit 8f. Change Title to read: "Trip of Main Feedwater Pumps." (UNIT 1 ONLY)

Functional Unit 3c3. Change title to read: "Containment Atmosphere Gaseous Radioactivity -- High". (UNITS 1 AND 2)

Functional Unit 4d. Change Title to read: "Steam Flow in Two Lines --High Coincident with T_{avg}--Low-Low or Steam Line Pressure Low. (UNITS 1 AND 2)

These are editorial changes to provide a more accurate description of the functional unit.

- D2. Functional Unit 6a. Change CHANNEL FUNCTIONAL TEST to M(6). Table Notations. Add new notation 6 to read: "Inputs from undervoltage, Vital Bus, shall be tested monthly. Inputs from Solid State Protection System, shall be tested every 62 days on a STAGGERED TEST BASIS." (UNITS 1 AND 2)

The proposed change references a new table notation that defines Safeguards Equipment Cabinet (SEC) input testing requirements. SEC inputs originate in the Protection System and Vital Bus Undervoltage channels. The new table notation defines testing requirements consistent with the testing requirements for the channels providing the inputs. This change is a clarification that reflects the existing equipment configuration.

- D3. Functional Unit 6b. Add * following Description and footnote on Table Notations page to read: "* - Outputs are up to, but not including, the output relays."

This change references a new table notation that defines the scope of testing. This note is added for clarification only.

- D4. Functional Unit 8. Add new item g, Station Blackout.
(UNIT 2 ONLY)

This change provides information that was previously omitted. This change is consistent with the other Unit 1.

- D5. Functional Unit 8b. Manual Initiation. Change CHANNEL FUNCTIONAL TEST notation to (5). Table Notations. Renumber Note (4) to Note (5). Add new Note (4) to read, "NOT USED".
(UNIT 1 ONLY)

These are administrative changes to provide consistency between the units.

III. 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. Renumbering LCO and Surveillance Requirements is an editorial change to be consistent with Salem Unit 1 and to be more consistent with other specifications in the Salem Unit 2 Instrumentation Chapter. Therefore, this change would not increase the probability or consequences of a previously analyzed accident. (UNIT 2 ONLY)
- B1. Functional Units 1e, 1f and 4d. Remove all references to three and four loop operation. Remove three loop operation line items. Change Action 15 to read: "NOT USED".
(UNITS 1 AND 2)

Remove Table Notation ###. (UNIT 1 ONLY)

These are editorial changes to remove all references to three and four loop operation. Table Notation ### and Action 15 are unnecessary and deleted. The current Salem Accident Analysis does not support three loop operation. Three loop operation is not permitted at Salem. Therefore, these changes would not increase the probability or consequences of a previously analyzed accident.

- B2. Functional Unit 1f. Change T_{avg} --Low-Low CHANNELS TO TRIP to "1 T_{avg} in any 2 Loops". (UNIT 1 ONLY)

Functional Unit 1f. Change Steam Line Pressure-Low CHANNELS TO TRIP to "1 pressure any 2 loops". (UNITS 1 AND 2)

These changes are editorial and consistent with the same description in other functional units, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B3. Functional Unit 3c. Change title to Containment Ventilation Isolation. Renumber 3c2 as 3c3. Change 3c3 to read: "Containment Atmosphere Gaseous Radioactivity-High. Add new 3c2 "Automatic Actuation Logic". (UNIT 1 ONLY)

Rewording and Renumbering titles are editorial changes to improve the clarity and consistency of the specification. Adding the new specification 3c2 is an administrative change to make Table 3.3-3 consistent with Table 4,3-2 and Unit 2. This information was omitted previously. Therefore, these changes would not increase the probability or consequences of a previously analyzed accident.

- B4. Functional Unit 4a. Change TOTAL NO. OF CHANNELS to 2/steam line. Change MINIMUM CHANNELS OPERABLE to 1/operating steam line. Change ACTION to from 18 to 23. Insert new Action 23. (UNIT 1 ONLY)

Change ACTION from 21 to ACTION 23. (UNIT 2 ONLY)

Changing the TOTAL NO. OF CHANNELS ensures that the specification is consistent with actual plant conditions. Adding steam line to the MINIMUM CHANNELS OPERABLE is an editorial change for clarity. The present ACTION requires the Unit to be taken two modes below the Mode of Applicability. Changing to Action 23, would take the Unit to one mode below the Mode of Applicability. Changing the referenced Action is editorial to address the new Action number. These changes do not represent changes to plant equipment or operation, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B5. Functional Unit 4b. Change ACTION from 13 to 20. Change Notation *** to reference ACTION 20. (UNIT 1 ONLY)

Notation ***. Move to Table Notations page. (UNITS 1 AND 2)

The present ACTION requires the Unit to be taken two modes below the Mode of Applicability. Changing to Action 20, would take the Unit to one mode below the Mode of Applicability. Changing the referenced Action is editorial to address the new Action number. Relocating the notation is administrative to provide clarity, by locating all notes on the same page. These changes do not represent changes to plant equipment or operation, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B6. Functional Unit 4d. Add APPLICABLE MODES " 1,2,3##" to Steam Flow in Two Steam Lines-- High. (UNITS 1 AND 2)

This is an administrative change to address information that had previously been omitted. Therefore, would not increase the probability or consequences of a previously analyzed accident.

- B7. Functional Unit 8b. Change ACTION from 23 to 22. (UNIT 2 ONLY)

This is an administrative change to address the renumbering of the Actions, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B8. Functional Unit 8c.i and 8c.ii. Change MINIMUM CHANNELS OPERABLE to "2/steam generator. (UNITS 1 AND 2)

Functional Unit 8c. item i. Change CHANNELS TO TRIP to 2/steam generator any steam generator. item ii. Change CHANNELS TO TRIP to 2/steam generator any 2 steam generators. (UNIT 1 ONLY)

Adding the "per" symbol corrects a previous typographical error. Adding "any Steam Generator" or "any 2 steam generators" ensures the specification is consistent with actual plant conditions. Changing the Total Number of Channels format is editorial to provide consistency between the Units. These changes do not represent changes to plant equipment or operation, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B9. Functional Unit 8f, Change title to "Trip of Main Feedwater Pumps Start Motor-Driven Pumps. Change TOTAL NO. OF CHANNELS to "2/pump. Change CHANNELS TO TRIP to "1/pump. Change MINIMUM CHANNELS OPERABLE to " 1/pump. Change APPLICABLE MODES to "1,2". (UNIT 1 ONLY)

Changing the title is editorial to provide clarity and consistency between the units. Changing the criteria is editorial to provide clarity and is consistent with Unit 2 terminology. Applicable Modes is changed for consistency with Unit 1. Therefore, these changes would not increase the probability or consequences of a previously analyzed accident.

- B10. Functional Unit 8f. Change ACTION from 21 to 21*.
(UNIT 1 ONLY)

Functional Unit 8f. Change ACTION from 22* to 21*.
Action 21. Insert new Action 21. (UNIT 2 ONLY)

Adding the asterisk "*" to Action 21 provides an exemption to specification 3.0.4. for Trip of the Main Feedwater Pumps. Without the exemption, one inoperable Main Feedwater Pump would prevent the Unit from entering Mode 1. Two Main Feedwater Pumps are not required until greater than 50% Power. This change does not represent changes to plant equipment or operation, and therefore, would not increase the probability or consequences of a previously analyzed accident.

Changing the Action from 22* to 21* applies a more conservative Action requirement, that is more accurate for the Emergency Trip of Main Feedwater Pumps circuitry. This change is consistent with Unit 1. These changes do not represent changes to plant equipment or operation, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B11. Functional Unit 8g. Add station Blackout. (UNIT 2 ONLY)

The added functional unit merely references other functional units within the Tables. The change is for completeness and is consistent with Unit 1. Therefore, this change would not increase the probability or consequences of a previously analyzed accident.

- B12. Notation **. Reword to read "Applies to Functional Unit 8, items c and d." Move to Table Notation page. (UNITS 1 AND 2)

Rewording the notation provides a more accurate reference to the applicable functional unit. Relocating the notation is administrative to provide clarity, by locating all notes on the same page. These changes are editorial, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B13. Footnote. Delete footnote concerning effective date.
(UNIT 2 ONLY)

This change is administrative and deletes a footnote that is no longer necessary. Therefore, this change would not increase the probability or consequences of a previously analyzed accident.

- B14. Table Notation #. Delete "Pressurizer Pressure Block of Safety Injection) setpoint." Table Notation ##. Delete "T_{avg} Block of Safety Injection) setpoint." (UNIT 2 ONLY)

This change is editorial to provide clarity. The change is consistent with Unit 1. Therefore, these changes would not increase the probability or consequences of a previously analyzed accident.

- B15. Actions 13, 16, 19b. Change referenced specification to 4.3.2.1.1. (UNIT 2 ONLY)

The change is administrative to reference the correct renumbered specifications and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B16. Engineered Safety Features Interlocks Table. Relocate to the end of all Actions. (UNITS 1 AND 2)

Action 21. Change Steam Generator Feedwater Pump to Main Feedwater Pump. (Unit 1 ONLY)

Actions. Delete Action 22. Renumber Action 23 as Action 22. Renumber Action 21 as Action 23. (UNIT 2 ONLY)

These are editorial changes to provide clarity and consistency, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- B17. Action 20. Change to read: "...one channel may be bypassed for up to 1 hour for surveillance testing provided the other channel is OPERABLE." (UNIT 1 ONLY)

This is an administrative change to provide clarification and consistency with Unit 2 and therefore, would not increase the probability or consequences of a previously analyzed accident.

- C1. Functional Unit 3c. Add Automatic Actuation Logic. (UNIT 1 ONLY)

Functional Unit 8. Add new item g. Station Blackout. (UNIT 2 ONLY)

These changes provide information that was previously omitted. These changes provide consistency between the Units. Therefore, these changes would not increase the probability or consequences of a previously analyzed accident.

- C2. Functional Unit 3c. Renumber item 2 as item 3.
(UNITS 1 AND 2)

This is an editorial change to address proper numbering, and therefore, would not increase the probability or consequences of a previously analyzed accident.

- C3. Functional Unit 8f. Change Title to read: "Trip of Main Feedwater Pumps." (UNIT 1 ONLY).

These are editorial changes to provide a more accurate description of the functional unit. Therefore, this change would not increase the probability or consequences of a previously analyzed accident.

- D1. Functional Unit 1f. Change Title to read: "Steam Flow in Two Lines --High Coincident with T_{avg}--Low-Low or Steam Line Pressure Low. Functional Unit 8f. Change Title to read: "Trip of Main Feedwater Pumps." (UNIT 1 ONLY)

Functional Unit 3c3. Change title to read: "Containment Atmosphere Gaseous Radioactivity -- High". (UNITS 1 AND 2)
Functional Unit 4d. Change Title to read: "Steam Flow in Two Lines --High Coincident with T_{avg}--Low-Low or Steam Line Pressure Low. (UNITS 1 AND 2)

These are editorial changes to provide a more accurate description of the functional unit, and, therefore, would not increase the probability or consequences of a previously analyzed accident.

- D2. Functional Unit 6a. Change CHANNEL FUNCTIONAL TEST to M(6). Table Notations. Add new Notation 6 to read: "Inputs from undervoltage, Vital Bus, shall be tested monthly. Inputs from Solid State Protection System, shall be tested every 62 days on a STAGGERED TEST BASIS." (UNITS 1 AND 2)

The proposed change references a new table notation that defines SEC input testing requirements. SEC inputs originate in the Protection System and Vital Bus Undervoltage channels. The new table notation defines testing requirements consistent with the testing requirements for the channels providing the inputs. This change is a clarification that reflects the existing equipment configuration. There are no new requirements or modifications to plant equipment or operations. Therefore, these changes would not increase the probability or consequences of a previously analyzed accident.

- D3. Functional Unit 6b. Add * following Description and footnote on Table Notations page to read: "* - Outputs are up to, but not including, the output relays."

This change references a new table notation that defines the scope of testing. This note is added for clarification only. Therefore, this change would not increase the probability or consequences of a previously analyzed accident.

- D4. Functional Unit 8. Add new item g, Station Blackout. (UNIT 2 ONLY)

This change provides information that was previously omitted. This change is consistent with the other Unit 1. Therefore, this change would not increase the probability or consequences of a previously analyzed accident.

- D5. Functional Unit 8b. Manual Initiation. Change CHANNEL FUNCTIONAL TEST notation to (5). Table Notations. Renumber Note (4) to Note (5). Add new Note (4) to read, "NOT USED". (UNIT 1 ONLY)

These are administrative changes to provide consistency between the units and therefore, these changes would not increase the probability or consequences of a previously analyzed accident.

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

As stated above, the proposed changes are either administrative, editorial, or do not represent modifications to plant equipment or operation. 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.

As stated above, the proposed changes are either administrative, editorial, or do not represent modifications to plant equipment or operation. Therefore, there can be no reduction in any margin of safety.

IV. Conclusions

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