

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATIONS CHANGE

**PROPOSED CHANGE TO THE TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
SALEM GENERATING STATION
DOCKET NOS. 50-272 AND 50-311**

ref: LCR 91-07

I. DESCRIPTION OF THE CHANGE

As shown on the marked-up Technical Specifications (TS) pages in Attachment 2, PSE&G requests that ELECTRIC HYDROGEN RECOMBINERS, Section 4.6.4.2 for both Salem units be revised.

II. REASON FOR THE CHANGE

The proposed changes make the subject TS sections the same for both Salem units. This change will ensure that the same Surveillance testing, with the same acceptance criteria, is performed for both units' hydrogen recombiners. This change uses the more conservative and correct requirements from both Salem units' surveillance requirements and combines them into a common set of requirements. The addition of an asterisked NOTE will provide, for those times when the more demanding 18 month recombiner functional test and the month 6 month recombiner functional test fall due at, or near, the same time, that performance of the 18 month surveillance will satisfy the 6 month surveillance as well.

III. JUSTIFICATION FOR THE CHANGE

This change is administrative in nature, making the subject TS sections the same for both Salem units. Currently, the 18 month surveillance functional test described in Salem Unit 1 TS 4.6.4.2.b.3 is not included in Unit 2 TS. However, the station performs the same testing on both units. To provide requirements and acceptance criteria upon which to base test procedures for Unit 2, this proposed change would add the Unit 1 requirement to Unit 2 TS.

Additionally, Unit 1 TS 4.6.4.2.a is not consistent with that of Unit 2. The wording and techniques described in Unit 2 TS 4.6.4.2.a are more correct and should, therefore, be reflected in the Unit 1 specification. As stated above, these changes would make both Salem Units' TS read the same for the hydrogen recombiner equipment and result in a more conservative specification.

IV. 10CFR50.92 SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

PSE&G has, pursuant to 10CFR50.92, reviewed the proposed amendment to determine whether our request involves a significant hazards consideration. We have determined that:

1. The operation of the Salem Generating Station (SGS) in accordance with the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment does not involve a physical or procedural change for any structure, component, or system that affects the probability or consequences of any accident or malfunction of equipment important to safety previously evaluated in the Updated Final Safety Analysis Report (UFSAR). The testing in existing Unit 1 Specification 4.6.4.2.b.3 is already administratively required and performed for Unit 2. These changes will merely make the TS require that testing which is already being performed. The change to TS 4.6.4.2.a is cosmetic for Unit 2 and an improvement for Unit 1. This change would add more conservative surveillance requirements. Further, the asterisked NOTE will reduce unnecessary, duplicative, cycling of recombiner equipment by taking credit for 18 month testing satisfying 6 month testing requirements when both tests fall due at roughly the same time.

2. The operation of the Salem Generating Station (SGS) in accordance with the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

There are no physical changes to the plant or to the manner in which the plant is operated involved in the proposed revision. The proposed change will require additional testing (18 month functional testing) in the Unit 2 TS and make a minor correction to the 6 month functional test requirement in Unit 1 TS for consistency with the existing Unit 2 test description.

3. The operation of the Salem Generating Station (SGS) in accordance with the proposed change does not involve a significant reduction in a margin of safety.

The proposed revision will add an 18 month test requirement on Unit 2 and refine the wording of the Unit 1 six month testing to match that of Unit 2. The proposed changes add clarity and consistency to the specifications which will lessen the likelihood of error in performing surveillance testing for both Salem units. The changes, being fundamentally administrative, have no impact upon margins of safety.

Conclusion:

Based upon the foregoing evaluation, we have determined that this proposed change does not involve a Significant Hazards Consideration.

ATTACHMENT 2

INSERTS AND MARKED-UP PAGES

INSERTS FOR PROPOSED CHANGES

INSERT 1

*

INSERT 2

and (upon reaching 700^oF) verifying that, after increasing the power setting to maximum power for 2 minutes, the power meter reads ≥ 60 kW.

INSERT 3

3. Verifying, during a recombiner system functional test, that the heater sheath temperature increases to $\geq 1200^{\circ}\text{F}$ within 5 hours and is maintained for at least 4 hours.

INSERT 4

* NOTE: The requirements of this 6 month system functional test can be met by satisfactory completion of the 18 month system functional test in Specification 4.6.4.2.b on those occasions where performance of both tests would be required at or near the same time.

CONTAINMENT SYSTEMS

ELECTRIC HYDROGEN RECOMBINERS - W

LIMITING CONDITION FOR OPERATION

3.6.4.2 Two independent containment hydrogen recombiner systems shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTION:

With one hydrogen recombiner system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours.

SURVEILLANCE REQUIREMENTS

4.6.4.2 Each hydrogen recombiner system shall be demonstrated OPERABLE:

INSERT 1

a. At least once per 6 months by verifying during a recombiner system functional test that the minimum heater sheath temperature increases to $> 700^{\circ}\text{F}$ within 90 minutes, ~~and is maintained for at least 2 hours.~~

INSERT 2

b. At least once per 18 months by:

1. Performing a CHANNEL CALIBRATION of all recombiner instrumentation and control circuits.
2. Verifying through a visual examination that there is no evidence of abnormal conditions within the recombiners (i.e., loose wiring or structural connections, deposits of foreign materials, etc.)
3. ~~Verifying during a recombiner system functional test that the heater sheath temperature increases to $\geq 1200^{\circ}\text{F}$ within 5 hours and is maintained for at least 4 hours.~~
4. Verifying the integrity of all heater electrical circuits by performing a continuity and resistance to ground test following the above required functional test. The resistance to ground for any heater phase shall be $\geq 10,000$ ohms.

INSERT SURVEILLANCE REQUIREMENT NO. 4 (FROM NEXT PAGE)

INSERT 4

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CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4. Verifying the integrity of all heater electrical circuits by performing a continuity and resistance to ground test following the above required functional test. The resistance to ground for any heater phase shall be $\geq 10,000$ ohms.

MOVE THIS REQUIREMENT TO PREVIOUS PAGE AS MARKED

CONTAINMENT SYSTEMS

ELECTRIC HYDROGEN RECOMBINERS - W

LIMITING CONDITION FOR OPERATION

3.6.4.2 Two independent containment hydrogen recombiner systems shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTION:

With one hydrogen recombiner system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours.

INSERT 2

SURVEILLANCE REQUIREMENTS

4.6.4.2 Each hydrogen recombiner system shall be demonstrated OPERABLE:

INSERT 1

- a. At least once per 6 months by verifying during a recombiner system functional test that the minimum heater sheath temperature increases to greater than or equal to 700°F within 90 minutes. ~~Upon reaching 700°F, increase the power setting to maximum power for 2 minutes and verify that the power meter reads greater than or equal to 60 kW.~~

b. At least once per 18 months by:

1. Performing a CHANNEL CALIBRATION of all recombiner instrumentation and control circuits.
2. Verifying through a visual examination that there is no evidence of abnormal conditions within the recombiners enclosure (i.e., loose wiring or structural connections, deposits of foreign materials, etc.)

INSERT 3

4. Verifying the integrity of all heater electrical circuits by performing a resistance to ground test following the above required functional test. The resistance to ground for any heater phase shall be greater than or equal to 10,000 ohms.

INSERT 4