

Public Service Electric and Gas Company

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United States Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

Gentlemen:

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LICENSE CHANGE REQUEST SALEM GENERATING STATION UNIT 2 FACILITY OPERATING LICENSE NO. DPR-75 DOCKET NO. 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 License DPR-75 for Salem Generating Station (SGS), Unit No. 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 adds the # footnote to 21-24 BF22 on Technical Specification 3.6.3 Table 3.6-1 Containment Isolation Valves.

Attachment A contains further discussion and justification for the proposed change. Attachment B contains a markup of the existing Unit 2 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.

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

Sincerely,



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C Mr. T. T. Martin, Administrator - Region I U. S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, PA 19406

> Mr. J. C. Stone, Licensing Project Manager - Salem U. S. Nuclear Regulatory Commission One White Flint North 11555 Rockville Pike Rockville, MD 20852

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Mr. C. Marschall (S09) USNRC Senior Resident Inspector

Mr. K. Tosch, Manager, IV NJ Department of Environmental Protection Division of Environmental Quality Bureau of Nuclear Engineering CN 415 Trenton, NJ 08625

REF: NLR-N94

STATE OF NEW JERSEY) SS.) COUNTY OF SALEM

J. J. Hagan, 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 Generating Station, Unit No. 2, are true to the best of my knowledge, information and belief.

Subscribed and Sworn to before me thisc day of , 1994

Notary Public of New Jersey

KIMBERLY JO BROWN NOTARY PUBLIC OF NEW JERSEY My Commission Expires April 21, 1998 My Commission expires

ATTACHMENT A

PROPOSED LICENSE CHANGE SALEM GENERATING STATION UNIT NO. 2 FACILITY OPERATING LICENSE NO. DPR-75 DOCKET NO. 50-311

I. <u>Description of the Change</u>

This amendment request adds the # footnote to 21-24 BF22 on Technical Specification 3.6.3 Table 3.6-1 Containment Isolation Valves.

II. <u>Reason for the Proposed Change</u>

PSE&G forwarded License Change Request 91-04 on August 30, 1993. The proposed change replaced the main feedwater control and control bypass valves with the main feedwater stop check valves for the Containment Isolation Function. This request was subsequently approved as Amendment 128.

Our request neglected to include the # footnote for 21-24 BF22 (main feedwater stop check valves) on Table 3.6-1 Containment Isolation Valves. This note identifies those Containment Isolation valves that are not subject to Type C leakage testing. The BF-22s are exempt from Type C leakage testing and should have been designated as such.

III. Justification for the Proposed Change

PWR main feedwater isolation valves are exempt from Appendix J Type C leakage testing. These valves connect to the steam generator and are not exposed, during normal or post-LOCA operations, to either the Containment atmosphere or the Reactor Coolant System. Valve isolation is based on steam generator functional requirements. The steam generator and its connecting lines are a closed system inside Containment as defined by the NRC Standard Review Plan.

LCR 91-04 did not include the # footnote when the BF-22s were added to Technical Specification Table 3.6-1. This was an oversight. This footnote designates those valves exempt from Type C leakage testing. Salem UFSAR Table 6.2-13 lists those Containment Isolation Valves not subject to Type C leak rate testings. The BF-22s are included in this list. Thus, the amended Technical Specifications are inconsistent with the Salem UFSAR. This amendment request will eliminate that inconsistency and correctly show that the BF-22s are exempt from Type C leakage testing. PSE&G considers this an editorial change.

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IV. <u>Significant Hazards Analysis Consideration</u>

The proposed Technical Specification change:

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

This change is editorial. A previous amendment request neglected to designate the main feedwater stop check valves as exempt from Type C leakage testing. That request was subsequently approved as Salem Unit 2 amendment 128. The amended Technical Specifications are now inconsistent with the Salem UFSAR, which correctly shows that these valves are exempt from Type C leakage testing. Valve functionality and operation are not affected by this change.

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. Does not create the possibility of a new or different kind of accident from any accident previously evaluated.

As stated above, the proposed change is editorial. It does not involve modifications to plant equipment or operation. Therefore, no new or different accident can be created by this change.

3. Does not involve a significant reduction in a margin of safety.

As stated above, the proposed change is editorial. No modifications to plant equipment or operation are involved. Feedwater system operation during normal and accident conditions remains the same. Therefore, this change does not result in a reduction in any margin of safety.

V. <u>Conclusions</u>

Based on the information presented above, PSE&G has concluded that the proposed change satisfies the criteria for a no significant hazards consideration.

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