

Public Service  
Electric and Gas  
Company

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APR 08 1994

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

Gentlemen:

REQUEST FOR ENFORCEMENT DISCRETION  
TECHNICAL SPECIFICATIONS 3.0.3  
FACILITY OPERATING LICENSE DPR-70  
SALEM GENERATING STATION  
UNIT 1  
DOCKET NO. 50-272

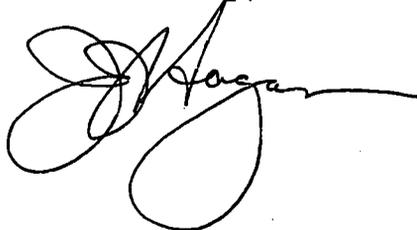
On April 7, 1994, Public Service Electric and Gas Company (PSE&G) requested Enforcement Discretion from the six (6) hour to HOT SHUTDOWN requirements of LCO 3.0.3. Specifically, PSE&G requested a 12 hour extension to the HOT SHUTDOWN requirement. PSE&G verbally presented this request to Office of Nuclear Reactor Regulation (NRR) and Nuclear Regulatory Commission (NRC) Region I personnel, and received verbal NRC approval at approximately 1742 hours on April 7, 1994.

Attachment A to this letter documents PSE&G's basis, as discussed in the teleconference, that the granting of this request does not involve a potential detriment to public health and safety, or any adverse environmental consequences. Additionally, this request does not involve a significant hazards consideration.

This request was reviewed and recommended for approval by the Salem Station Operations Review Committee (SORC).

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

Sincerely,



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Licensee requests for Enforcement Discretion require responses to specific questions. PSE&G provides it's responses below:

1. The Technical Specification or other license conditions that will be violated, and the duration of the request.

Salem Unit 1 Technical Specification Limiting Condition for Operation (LCO) 3.0.3

3.0.3 requires that "When a limiting condition for operation is not met as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the specification does not apply, by placing it, as applicable, in:

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours."

PSE&G entered TS 3.0.3 at 1141 on 4/7/94 when both automatic safety injection signals from SSPS trains were blocked. Consequently, Mode 4, HOT SHUTDOWN entry would have been required by 1841 on April 7, 1994.

PSE&G seeks Enforcement Discretion from the six (6) hour to HOT SHUTDOWN requirements of LCO 3.0.3. Specifically, PSE&G is requesting a 12 hour extension to the HOT SHUTDOWN requirement, such that Mode 4, HOT SHUTDOWN entry is now required by 0641 on April 8, 1994. The subsequent entry into Mode 5, COLD SHUTDOWN will be accomplished within the subsequent 24 hours, as required by LCO 3.0.3.

2. The circumstances surrounding the situation, including the need for prompt action.

At 1047 on 4/7/94 a reactor trip and safety injection (SI) occurred following a rapid load reduction due to excessive grass accumulation in the Circulating Water (CW) screens. At this time it is believed that the SI signal was generated from high steam flow in coincidence with lo-lo Tave. It is also believed that the SI signal generated was of such a short duration that only one train of Solid State Protection actuated (Train A). Train B did not actuate.

As a result of the SI the pressurizer became water solid. At 1105 the SI signal was reset in accordance with Emergency Operating Procedure (EOP) requirements. At approximately 1123 during the SI recovery two Steam Generators (SG) safety valves opened causing a rapid depressurization of the RCS, thus generating a second automatic SI signal at 1128.

At 1141 the SI signal was reset in accordance with EOP requirements, and both SI signal from SSPS were blocked in order to prevent additional water injection into the vessel, requiring entry into TS 3.0.3. Cooldown with the pressurizer solid at normal operating temperature was determined to be a nonconservative means of complying with TS.

At 1511 a pressurizer bubble was re-established, and preparations for plant cooldown in accordance with operating procedures were initiated. At 1715 cooldown was initiated. In order to comply with the time limit of TS 3.0.3, PSE&G would have had to cooldown at an undesirably high rate, which would have challenged the TS cooldown limits.

3. The safety basis for the request that Enforcement Discretion be exercised, including an evaluation of the safety significance and potential consequences of the proposed course of action.

The requested relief allows an orderly shutdown in accordance with approved procedures. Attempting to cool down in an effort to comply with TS 3.0.3 time limits was judged to be an undesirable alternative to the proposed relief, because it would unnecessarily challenge the TS cooldown limit of 100 degrees per hour, with no safety benefit resulting from such an action.

The response to question 6 has additional information regarding PSE&G's safety basis.

4. Any proposed compensatory measure(s).

Operations management is ensuring that oncoming shift personnel are aware that automatic SI is not available. However, manual actuation is available.

PSE&G does not propose any compensatory measures.

5. The justification for the duration of the noncompliance.

TS 3.0.3 was entered at 1141 hours on April 7, but cooldown was delayed for approximately five hours to allow the formation of a pressurizer bubble following the safety injection. The requested additional 12 hours to Hot Shutdown allows PSE&G to cooldown at a rate of approximately 20 degrees F per hour. This avoids

unnecessary challenges to the cooldown limits of TS 3.4.9.1 and the PSE&G administrative limits, and facilitates RCS degassing.

6. The basis for the licensee's conclusion that the noncompliance will not be a potential detriment to the public health and safety and that a significant hazards consideration is not involved.

TS 3.0.3 was entered because both channels of the SI automatic actuation logic are automatically blocked. With the pressurizer solid, in order to comply with the time limit of TS 3.0.3, PSE&G would have had to cooldown at an undesirably high rate, which would have challenged the TS cooldown limits and inhibited RCS degassing. Complying with the LCO time limit was judged to involve an unnecessary plant transient given manual SI capability and stable plant conditions.

In order to exit TS 3.0.3 before the action time expired, PSE&G could have closed the reactor trip breakers to clear the SI signal automatic block, and restored at least one automatic SI actuation logic channel to operable. This alternative was judged to be unacceptable because it would have required reinstating the channel(s) prior to performing sufficient evaluation of the SI event.

The remaining alternative, which PSE&G pursued, was to request extension of the TS 3.0.3 time limit to allow a safe and orderly shutdown. The proposed extension does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated.

At the time of the request, the plant was subcritical, with a pressurizer bubble re-established, and plant cooldown proceeding in accordance with approved operating procedures. The proposed extension of the TS 3.0.3 shutdown time allowed normal shutdown to continue rather than impose an unnecessary plant transient. Therefore, the request involves no increase in probability or consequences of any accident.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

The request involves an extension to the TS 3.0.3 action time in order to compensate for the time that was necessary to re-establish a pressurizer bubble and initiate a normal cooldown. The extension does not place the plant in any condition from which a new type of accident may be initiated.

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

The requested extension supports the safest alternative for proceeding to Mode 5, Cold Shutdown. It does not adversely affect any margin of safety.

Therefore, PSE&G concludes that the request does not involve a significant hazards consideration.

7. The basis for the licensee's conclusion that the noncompliance will not involve adverse consequences to the environment.

As discussed above, the request does not involve a significant hazards consideration. Granting the additional time for normal cooldown to proceed does not adversely affect any plant effluents, nor does it involve any increase in occupational radiation exposure.

8. A statement that the request has been approved by the facility organization that normally reviews safety issues (Plant Onsite Review Committee, or its equivalent)

This request has been reviewed and recommended for approval by the Salem Station Operations Review Committee (SORC).