

Public Service  
Electric and Gas  
Company

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Vice President - Nuclear Operations

MAY 03 1994

NLR-N94048  
LCR 94-08

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

REQUEST FOR AMENDMENT  
COMBUSTIBLE GAS CONTROL AND  
AUXILIARY FEEDWATER SYSTEM  
SALEM GENERATING STATIONS  
UNIT NOS. 1 AND 2  
DOCKET NOS. 50-272 AND 50-311

In accordance with the requirements of 10CFR50.90, Public Service Electric & Gas Company (PSE&G) hereby transmits a request for amendment of Facility Operating Licenses DPR-70 and DPR-75 for Salem Generating Station Units 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 two Technical Specifications. First, the proposed amendment modifies Technical Specification 3/4.6.4.1 for Combustible Gas Control. This change modifies the surveillance frequency for performing the channel functional test to once per quarter and the channel calibration to once per refueling.

The proposed amendment also modifies Technical Specification 3/4.7.1.2 for Auxiliary Feedwater System. This change modifies the surveillance frequency for performing the pump operability test to once per quarter on a staggered test basis. This change was approved for Virginia Power Corporation's North Anna Power Station on February 7, 1994.

The requested changes are consistent with Generic Letter 93-05, Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements For Testing During Power Operation and NUREG-1366, Improvements to Technical Specification Surveillance Requirements. Operating experience at Salem Units 1 and 2 is compatible with the requested changes in surveillance frequencies.

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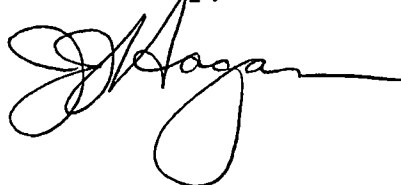
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Attachment 1 includes a description, justification, and significant hazards analysis for the proposed changes. Attachment 2 contains the Technical Specification pages revised with pen and ink changes.

PSE&G is requesting a 60 day implementation period after amendment approval. Should there be any questions with regard to this submittal, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Hagan", with a long horizontal flourish extending to the right.

C Mr. J. C. Stone  
Licensing Project Manager

Mr. C. Marschall  
Senior Resident Inspector

Mr. T. Martin, Administrator  
Region I

Mr. Kent Tosch, Manager IV  
New Jersey Department of Environmental Protection  
Division of Environmental Quality  
Bureau of Nuclear Engineering  
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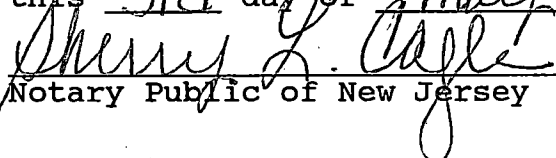
STATE OF NEW JERSEY )  
 )  
COUNTY OF SALEM ) SS.

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 Nos. 1 and 2, are true to the best of my knowledge, information and belief.

  
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Subscribed and Sworn to before me  
this 3rd day of May, 1994

  
\_\_\_\_\_  
Notary Public of New Jersey

SHERRY L. CAGLE  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires March 5, 1997

My commission expires on \_\_\_\_\_



COMBUSTIBLE GAS CONTROL - HYDROGEN ANALYZERS  
AUXILIARY FEEDWATER SYSTEM

I. Description of Change

A. Change Surveillance Requirement 4.6.4.1 to read:

"... a CHANNEL FUNCTIONAL TEST at least once per 92 days, and at least once per refueling by performing a CHANNEL CALIBRATION using sample gases containing:"

B. Change Surveillance Requirement 4.7.1.2 as follows:

1. Re-number 4.7.1.2.a.3 as 4.7.1.2.a.1 and 4.7.1.2.a.4 as 4.7.1.2.a.2. Place these surveillances after 4.7.1.2.a.
2. Insert new 4.7.1.2.b to read: "At least once per 92 days on a STAGGERED TEST BASIS by:". Re-number 4.7.1.2.a.1 as 4.7.1.2.b.1 and 4.7.1.2.a.2 as 4.7.1.2.b.2. Place these surveillances after 4.7.1.2.b.
3. Change the number for 4.7.1.2.b to 4.7.1.2.c.

II. Justification

A. Technical Specification 4.6.4.1

Hydrogen analyzers are used to monitor hydrogen concentration in the containment following a Loss of Coolant Accident (LOCA) and are designed to be consistent with NUREG-0737, Clarification of TMI Action Plan Requirements. These monitors are used only after a LOCA to tell the operator when to initiate the hydrogen recombiners. The hydrogen recombiners are not required for a period of hours to days after a large-break LOCA.

The current Salem Unit Nos. 1 and 2 Technical Specifications require a channel check at least once per 12 hours, a channel functional test at least once per 31 days, and a channel calibration at least once per 92 days using two sample gases one containing two volume percent hydrogen and one containing six volume percent hydrogen. The monthly tests check only the electronics. The quarterly test check calibration.

There are other operability checks of the system. There are alarms to indicate electronic and power failures. In addition, Operations personnel monitor the indications daily and would note any changes. Operating experience at Salem Unit Nos. 1 and 2 for the hydrogen analyzers is compatible with the proposed surveillance frequency change.

This change is consistent with Generic Letter 93-05, Line-Item Technical Specification Improvements to Reduce Surveillance Requirements For Testing During Power Operation and NUREG-1366, Improvements to Technical Specification Surveillance Requirements.

B. Technical Specification 4.7.1.2.a:

The current Salem Unit Nos. 1 and 2 Technical Specifications require monthly testing of the Auxiliary Feedwater Pumps. The Boiler and Pressure Vessel Code of the American Society of Mechanical Engineers (ASME Code), Section XI, Paragraph IWP-3400, requires the testing of Class 1, 2, and 3 centrifugal pumps "normally every three months." Auxiliary Feedwater Pumps are the only pumps required by Technical Specifications to be tested more frequently than the ASME Code.

The Technical Specifications do not require testing to be as thorough as the ASME Code. The Technical Specifications only require flow rate and discharge pressure to be monitored. The ASME Code Test requires the following parameters to be monitored: inlet pressure, differential pressure, flow rate, vibration amplitude, and bearing temperature. In both the Technical Specification test and the ASME Code test, the Auxiliary Feedwater pump takes a suction from a Auxiliary Feedwater Storage Tank and returns the water to the tank through a recirculation line. The ASME Code test will provide more detailed information regarding pump condition.

Changing the test from a monthly to a quarterly test will reduce wear on the Auxiliary Feedwater pumps. The test to be performed will satisfy the current Technical Specification requirements as well as those identified in the ASME Code. By testing the pumps on a staggered test basis, at least one Auxiliary Feedwater Pump will be tested each month. This testing frequency will be sufficient to maintain a consistent degree of reliability.

The proposed changes to the surveillance requirements for the Auxiliary Feedwater system are consistent with the intent of Generic Letter 93-05, Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation, and NUREG-1366, Improvements to Technical Specification Surveillance Requirements. Operating experience at Salem Unit Nos. 1 and 2 for the Auxiliary Feedwater pumps is compatible with the proposed surveillance frequency change.

The re-numbering of surveillance requirements is necessary to incorporate the new quarterly testing frequency. All changes associated with re-numbering are editorial.

- III. 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.

The proposed changes to the surveillance requirements for the hydrogen analyzers and the Auxiliary Feedwater pumps are consistent with the intent of Generic Letter 93-05, Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation, and NUREG-1366, Improvements to Technical Specification Surveillance Requirements. The proposed changes will modify surveillance frequency for both the hydrogen analyzers and the Auxiliary Feedwater Pumps. Changing the surveillance frequency for the hydrogen analyzers and the Auxiliary Feedwater pumps does not affect the probability of occurrence or the consequences of accidents identified in the UFSAR. No accident precursors are being generated by the proposed increase in surveillance frequency. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of a previously analyzed accident.

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

The proposed changes to the surveillance requirements for the hydrogen analyzers and the Auxiliary Feedwater pumps are consistent with Generic Letter 93-05 and NUREG-1366. There are no modifications or changes in operating conditions associated with the proposed changes. Therefore, the proposed changes will not increase the possibility of a new or different kind of accident from any accident previously identified.

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

The Technical Specification operability requirements for the hydrogen analyzers and the Auxiliary Feedwater pumps are not being changed. Surveillance testing will still be performed on a routine frequency. The proposed frequency will be capable of performing its intended function and ensuring a consistent degree of reliability. Therefore, the changes to the surveillance frequencies do not involve a significant reduction in any margin of safety.

- IV. Based upon the preceding information, PSE&G has concluded that the proposed changes meet the requirements of 10CFR50.92(c) and does not involve a significant hazards consideration.

ATTACHMENT 2  
MARKED UP PAGES