

Public Service
Electric and Gas
Company

Joseph J. Hagan

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

Vice President - Nuclear Operations

JUN 13 1994

NLR-N94075
LCR 94-14

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

Gentlemen:

**LICENSE AMENDMENT APPLICATION
RESTORATION OF INOPERABLE EQUIPMENT TO DETERMINE OPERABILITY
SALEM GENERATING STATION
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311**

This letter submits an application for amendment to Appendix A of Facility Operating Licenses DPR-70 and DPR-75 for the Salem Generating Station, Unit Nos 1 and 2, and is being filed in accordance with 10 CFR 50.90. A copy of this application has been sent to the State of New Jersey as indicated below, pursuant to the requirements of 10 CFR 50.91.

The amendment permits an out-of-service component to be returned to service under administrative controls for the purpose of determining operability. The requested change is consistent with the method utilized in the new Standard Technical Specifications (NUREG-1431). In addition, this amendment corrects a typographical error in the header information of the Applicability section.

Attachment 1 contains a description, justification and Significant Hazards Consideration Evaluation for the proposed change. Attachment 2 contains the marked-up pages and inserts which reflect the proposed revision.

Upon NRC approval, please issue a License Amendment which will be effective upon issuance and shall be implemented within 60 days of issuance.

210016

9406220327 940613
PDR ADDCK 05000272
P PDR

ADD 1/1

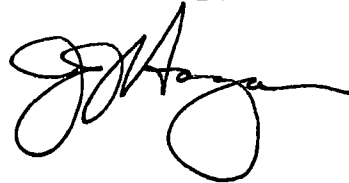
JUN 13 1994

Document Control Desk
NLR-N94075

2

Should you have any questions or comments on this submittal,
please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "J. H. Stone". The signature is fluid and cursive, with a large loop at the end.

Affidavit
Attachments (2)

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

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

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

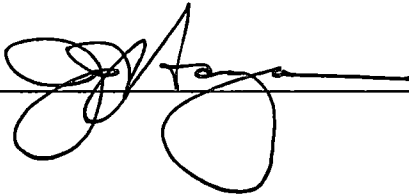
Mr. K. Tosch, Manager, IV
NJ Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

REF: NLR-N94075
LCR 94-14

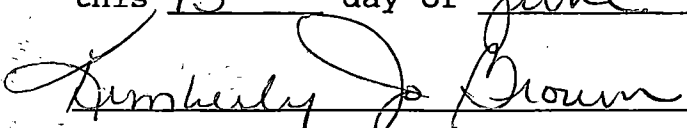
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

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



Subscribed and Sworn to before me
this 13th day of June, 1994



Notary Public of New Jersey

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

ATTACHMENT 1
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

RESTORATION OF INOPERABLE EQUIPMENT TO DETERMINE OPERABILITY
SALEM GENERATING STATION
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311

I. DESCRIPTION OF THE PROPOSED CHANGE

Section 3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

1. Header Information

Correct the typographical error which appears at top of page 3/4 0-2. The existing header incorrectly identifies the information on this page as being part of "SURVEILLANCE REQUIREMENTS".

The header on this page will be revised to read:

"LIMITING CONDITION FOR OPERATION".

2. Specification 3.0.6

Add a new Limiting Condition for Operation to the Salem Unit 1 and 2 Technical Specifications. This new LCO will be numbered 3.0.6.

This new LCO is derived from "LCO 3.0.5 (NUREG-1431)", but must be given a new number (as an existing specification is already numbered 3.0.5).

The new LCO (3.0.6) will state the following:

"Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY."

Incorporate the following, derived from "NUREG-1431 Basis for LCO 3.0.5", into the Technical Specifications for Salem Units 1 and 2. This addition to the Bases will be numbered 3.0.6 and will state the following:

"Specification 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of testing required to restore and demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the testing required to restore and demonstrate the operability of the equipment. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the testing required to restore and demonstrate OPERABILITY.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of testing required to restore OPERABILITY of another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of testing required to restore and demonstrate the OPERABILITY of another channel in the same trip system."

II. REASON FOR THE PROPOSED CHANGES

A. Header Information

The header is being corrected to accurately identify that the information found on page 3/4 0-2 is part of the "LIMITING CONDITION FOR OPERATION" section.

This change will eliminate confusion and improve useability of this section.

B. Specification 3.0.6

PSE&G believes that it is not the intent of Specification 3.0.2 that conformance to the ACTION requirements preclude the performance of testing to restore and demonstrate the OPERABILITY of a component which is being returned to service.

Therefore, adopting "LCO 3.0.5 - NUREG-1431" (renumbered to be 3.0.6) and its associated Bases maintains compliance with the intent of LCO 3.0.2.

III. JUSTIFICATION FOR THE PROPOSED CHANGES

A. Header

This change is an editorial correction which improves the quality and useability of the Technical Specifications.

B. Specification 3.0.6

The requested change to Specification 3.0.6 is, with the exception of numbering, identical to a recent Hope Creek Technical Specifications amendment (# 63 - January 25, 1994) which has been reviewed and approved.

PSE&G believes that adopting "LCO 3.0.5 - NUREG-1431" (renumbered to be 3.0.6) and its associated Basis maintains compliance with the intent of LCO 3.0.2.

When a channel of instrumentation required by Technical Specifications malfunctions or fails to meet surveillance acceptance criteria, it is declared inoperable and the associated action statement(s) is/are entered.

Several specifications require inoperable instrumentation channels to be placed in the tripped condition. Under these conditions and in accordance with Specification 3.0.2, compliance with the applicable specification exists when an inoperable instrumentation channel is placed in the tripped condition within the specified time period.

Plant operation may then continue either indefinitely or for a certain allowable out of service time, depending on the specification of concern. However, in either case, it is prudent from both a plant safety and operational perspective to repair the subject instrumentation and return it to service as soon as possible. Therefore, after a malfunctioning instrument is declared inoperable and removed from service, troubleshooting is conducted and corrective maintenance performed.

When maintenance is completed, the instrument is expected to be once again fully functional. However, before declaring the instrument operable and exiting the associated action statement, applicable surveillance tests must be conducted to verify that the instrument is, in fact, operable.

For certain testing evolutions required to restore or demonstrate OPERABILITY, the instrument may need to be taken out of the tripped condition. Therefore, although the instrument remains administratively inoperable, and all constraints and time limits of the action statement remain in effect, the instrument is taken out of the tripped condition for post-maintenance surveillance testing.

If the instrument meets all applicable acceptance criteria, it is then administratively declared operable and the action statement is exited. If however, it fails to fulfill any of the applicable acceptance criteria it is again removed from service and the action statement and associated time limits remain in effect, uninterrupted.

PSE&G believes that the actions permitted under Specification 3.0.6 fully fulfill the intent of Specification 3.0.2. Therefore, we are submitting this change request to permit the restoration of equipment under administrative controls to determine OPERABILITY.

IV. SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

Pursuant to 10 CFR 50.92, PSE&G has reviewed the proposed amendment to determine whether this request involves a significant hazards consideration. We have determined that operation of the Salem Unit 1 and 2 Generating Stations in accordance with the proposed changes:

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

- a. Header Information

- This editorial change corrects a typographical error only. As such, existing accident analyses are unaffected.

- b. Specification 3.0.6

- The proposed change merely clarifies the intent of Specification 3.0.2. As such, existing accident analyses are unaffected.

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

- a. Header Information

- This editorial change corrects a typographical error only. As such, it does not alter the function of any plant equipment, involve any design changes, nor does it create any new operating modes or accident scenarios.

- b. Specification 3.0.6

- The proposed change merely clarifies the intent of Specification 3.0.2. As such, it does not alter the function of any plant equipment, involve any design changes, nor does it create any new operating modes or accident scenarios.

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

a. Header Information

This editorial change corrects a typographical error only. As such, the present margins of safety are unaffected.

b. Specification 3.0.6

The proposed change merely clarifies the intent of Specification 3.0.2. As such, the present margins of safety are unaffected.

V. CONCLUSION

Based on the preceding discussion, PSE&G has concluded that the proposed changes to the Technical Specifications do not involve a significant hazards consideration insofar as the changes: (i) do not involve a significant increase in the probability or consequences of an accident previously evaluated, (ii) do not create the possibility of a new or different kind of accident from any accident previously evaluated, and (iii) do not involve a significant reduction in a margin of safety.

ATTACHMENT 2

TECHNICAL SPECIFICATION PAGES WITH PEN AND INK CHANGES

LICENSE AMENDMENT APPLICATION 94-14, NLR-N94075
RESTORATION OF INOPERABLE EQUIPMENT TO DETERMINE OPERABILITY
SALEM GENERATING STATION
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311

The following Technical Specifications have been revised to reflect the proposed changes:

UNIT 1

<u>Technical Specification</u>	<u>Page</u>
3/4.0 APPLICABILITY	3/4 0-2
B 3/4.0 BASES	B 3/4 0-5

UNIT 2

<u>Technical Specification</u>	<u>Page</u>
3/4.0 APPLICABILITY	3/4 0-2
B 3/4.0 BASES	B 3/4 0-5

INSERT "A" - Applicable to BOTH Unit's Technical Specifications.

NEW PARAGRAPH TO BE INSERTED AS INDICATED ON PAGE 3/4 0-2:

3.0.6 "Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY."

INSERT "B" - Applicable to BOTH Unit's Technical Specifications.

NEW PARAGRAPH TO BE INSERTED AS INDICATED ON PAGE B 3/4 0-2:

"Specification 3.0.6 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of testing required to restore and demonstrate:

- a. The OPERABILITY of the equipment being returned to service; or
- b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the testing required to restore and demonstrate the operability of the equipment. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Required Actions and must be reopened to perform the testing required to restore and demonstrate OPERABILITY.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of testing required to restore OPERABILITY of another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of testing required to restore and demonstrate the OPERABILITY of another channel in the same trip system."