Public Service
Electric and Gas
Company

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United States Nuclear Regulatory Commission
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Gentlemen:

REQUEST FOR AMENDMENT
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311

In accordance with the requirements of 10 CFR 50.90, Public Service Electric and Gas Company (PSE&G) hereby submits a request for amendment of Facility Operating Licenses DPR-70 (Unit 1) and DPR-75 (Unit 2) of the Salem Generating Station. Pursuant to the requirements of 10 CFR 50.91(b)(1), a copy of this submittal has been sent to the state of New Jersey as indicated below.

The proposed change modifies line item 12 and 13 of Technical Specifications 3.3.3.7, Post Accident Monitoring System, Table 4.3-11, for both Salem Units. As discussed in Attachment 1 to this letter, PSE&G's conclusion is that granting this request would not involve a significant hazards consideration.

Upon NRC approval of this proposed change, PSE&G requests that the amendment be made effective on the date of issuance, and to be implemented within sixty (60) days to provide sufficient time for associated administrative activities.

Attachment 1 of this submittal provides detailed description and justification for the proposed changes and the marked up Technical Specifications pages reflecting the proposed changes.

Sincerely,

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Attachment

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Licensing Project Manager

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Senior Resident Inspector

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ATTACHMENT 1

I. DESCRIPTION OF THE PROPOSED CHANGES

(A) Change the required Channel Functional Test of Technical Specifications 3.3.3.7, Post Accident Monitoring System, Table 4.3-11 line item 12 from Q (quarterly), to R (at least once every 18 months).

(B) Change the required Channel Functional Test of Technical Specifications 3.3.3.7, Post Accident Monitoring System, Table 4.3-11 line item 13 from Q (quarterly) to Q* .

Where * is a note at the bottom of the page that will read as follows;

Unless the block valve is closed in order to meet the requirements of ACTION b, or C in Specification 3.4.3. (for unit 1)

Unless the block valve is closed in order to meet the requirements of ACTION b, or C in Specification 3.4.5. (for unit 2)

II. REASON FOR THE PROPOSED CHANGES

(A) This change will provide for consistency between all technical specifications relating to pressurizer Power Operated Relief Valves (PORV) by requiring the valves to be cycled at least once every 18 months.

(B) The note will add consistency between the requirements of Table 4.3-11 and Technical Specification (T/S) 3.4.3 (Unit 1) and T/S 3.4.5 (Unit 2).

III. JUSTIFICATION AND EVALUATION OF THE SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES OF THE REQUEST

The present T/S surveillance requires that every quarter (92 days), in Modes 1, 2, and 3, the pressurizer PORVs be demonstrated OPERABLE by performance of A Channel Functional Test.

A Channel Functional Test is defined in the Salem Technical Specifications (T/S) as follows:

> A Channel Functional Test shall be the injection of a simulated signal into the channel as close to the primary sensor as practicable to verify OPERABILITY including alarm and/or trip functions.

To demonstrate the PORV position indication channel operable, in accordance with the definition of a channel functional test and the surveillance requirement of Table 4.3-11, the PORV valves are stroked through one complete cycle of full travel to verify proper limit switch operation. Surveillance testing as presently required by Table 4.3-11 line item 12 is in conflict with the requirement of other Salem T/S and NRC recommendations. i.e.; (1) T/S 3/4.4.3 and 3/4.4.5 for Salem units 1 and 2 respectively, which are based on the recommendations of NRC Generic Letter (GL) 90-06, dated June 25, 1990, and (2) NUREG 1431, Vol.1, Standard Technical Specifications Westinghouse Plants, issued September 1992.

The proposed change is consistent with the requirements as delineated in GL 90-06. GL 90-06 provided the staff's positions on the resolution of Generic Issue 70 (GI-70), "Power-Operated Relief Valve and Block Valve Reliability", and Generic Issue 94 (GI-94), "Additional Low-Temperature Overpressure Protection for Light-Water Reactors". GL 90-06 requirements were based on improving the reliability of PORVs and PORV block valves. One of the required actions delineated in GL 90-06 was to modify the existing technical specifications for the PORVs and PORV block valves in Modes 1, 2, and 3. A specific recommendation was to eliminate the requirement to cycle the PORV valves at power. The NRC staff concluded that stroking these valves one complete cycle of full travel at power was "...in the words of the ASME Code, "is not practical" (reference ASME Section XI, Paragraph IWV-3412) because of the potential for a PORV to stick open during stroke test."

Salem PORVs, PORV block valves, and valves in PORV control air systems are included within the scope of the In-service Testing (IST) Program. The block valves are also included in the expanded Motor Operated Valve (MOV) test program in accordance with Generic Letter 89-10.

Additionally, NUREG 1431 (MERITS) Post Accident Monitoring (PAM) System T/S does not include the PORV and PORV block valve position indications as one of the required post accident monitoring instrumentations.

PAM instrumentation included in this T/S is Regulatory Guide 1.97 instrumentation. Regulatory Guide 1.97 defines/classifies instrumentation as Type A through E depending on the plant variable they monitor, and Category 1 through 3 depending upon the importance of the variable monitored. The instrumentation listed in table 4.3-11 is (intended to be) Reg. Guide 1.97 instrumentation defined as Type A variable and all non type A Category 1.

The Salem PORV and PORV block valve position indication channels have been classified and defined as a Type D Category 2 variable, and as such are not required to be included in the PAM T/S Table 4.3-11.

PSE&G is not requesting the elimination of these surveillance requirements. PSE&G only proposes a change of the required surveillance frequency from quarterly (Q) to at least once every 18 months (R), for the PORV valves. The * next to the (Q) for the PORV block valve is added only for consistency and clarification. Since the block valves may be cycled at power, the added note will align the surveillance requirement under this T/S with that of T/S 4.4.3.2 and 4.4.5.2 for Units 1 and 2 respectively.

Because of the T/S definition of a channel functional (".. the injection of a simulated signal....") other methods could have been used to satisfy the channel functional test requirement of Table 4.3-11. However, some of these methods were (are) not considered acceptable, due to ALARA and personnel safety concerns. For example; manually cycling the PORVs open/close limit switches.

The second change allows for not having to perform a surveillance on a valve that it is being used as an isolation point. The valve has been closed to comply with requirements of another T/S action statement. The note adds consistency between the requirements of Table 4.3-11 and Technical Specification (T/S) 3.4.3 (Unit 1) and T/S 3.4.5 (Unit 2).

In summary, the proposed changes will make the Salem T/S Table 4.3-11 consistent with the recommendations of GL 90-06 and other Salem T/S, and more conservative than the requirements of NUREG 1431.

IV. DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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

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

A change from quarterly (Q) to at least every 18 months (R) may appear to be non-conservative, at first; however, by extending the surveillance requirement to cycle the PORV during non-power conditions, the change eliminates the potential risk and consequences of having the valve sticking open at power or not fully closing (leaking). Therefore, by extending the surveillance the probability and consequences of any previously analyzed accident is reduced, since the testing would now be conducted in a non-power condition, and the margin to safety is increased. Consequently, a net safety gain is realized by eliminating or minimizing these risks.

The added note for PORV block valve is included for consistency and alignment between the surveillance requirement under this T/S (Table 4.3-11) with that of T/S surveillances 4.4.3.2 and 4.4.5.2 for Units 1 and 2 respectively.

Therefore, the proposed amendment does not involve a physical or procedural change to any structure, component, or system that significantly affects accident/malfunction probabilities or consequences previously evaluated in the UFSAR.

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

The proposed changes do not introduce any design or physical configuration changes to the facility which could create new accident scenarios.

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

As stated in response to question number 1 above, the proposed changes do not eliminate the required T/S surveillance requirements. The first change eliminates the need to cycle the PORV valves through one complete cycle of full travel at power. The second change allows for not having to perform a surveillance on a valve that it is being used as an isolation point. The valve has been closed to comply with requirements of another T/S action statement. Therefore, the probability and consequences of any previously analyzed accident is reduced, thus increasing the margin to safety.

V. Conclusions

Based on the above discussions, PSE&G has concluded that the proposed T/S revisions do not involve a significant hazards consideration.