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Vice President - Nuclear Operations

SEP 29 1994

NLR-N94133
LCR 94-25

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

Gentlemen:

**LICENSE AMENDMENT APPLICATION
REMOVAL OF SEISMIC AND METEOROLOGICAL INSTRUMENTATION
FROM THE TECHNICAL SPECIFICATIONS
SALEM GENERATING STATION UNIT NOS. 1 and 2
FACILITY OPERATING LICENSE NOS. 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 License DPR-70 and DPR-75 for the Salem Generating Station Units Nos. 1 and 2, and is being filed in accordance with 10CFR50.90. Pursuant to the requirements of 10CFR50.91(b)(1), a copy of this request for amendment has been sent to the State of New Jersey.

The proposed Technical Specification changes contained herein represent changes to Sections 3/4.3.3.3 "Seismic Instrumentation" and 3/4.3.3.4 "Meteorological Instrumentation." The proposed revisions remove the specifications from the Technical Specifications and relocates the appropriate descriptive information and testing requirements to the Salem Updated Final Safety Analysis Report.

The proposed changes have been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and it has been determined that this request involves no significant hazards considerations. In accordance with the guidance presented in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," as published in the Federal Register (58 FR 39132), the proposed changes have received a multidisciplinary review by responsible technical supervisory personnel, including onsite operations personnel.

A description of the requested amendment, supporting information and analyses for the change, and the basis for a no significant hazards consideration determination are provided in Attachment 1. The Technical Specification pages affected by the proposed change

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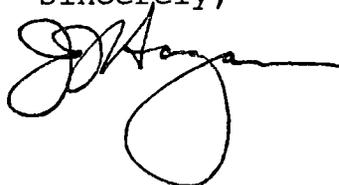
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are provided in Attachment 2 and 3, with pen and ink changes, for Salem Units 1 and 2 respectively.

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

Should you have any questions regarding this request, please contact us.

Sincerely,



Affidavit
Attachments (3)

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ATTACHMENT 1

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

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I. DESCRIPTION OF THE PROPOSED CHANGES

This amendment removes Specifications 3/4.3.3.3 "Seismic Instrumentation" and 3/4.3.3.4 "Meteorological Monitoring Instrumentation" from the Salem Unit 1 Technical Specification along with the associate Bases and provides corresponding changes to the Table of Contents. This amendment also deletes Salem Unit 2 Technical Specification Bases 3/4.3.3.3 and 3/4.3.3.4.

II. REASONS FOR THE CHANGES

The proposed changes to the Technical Specifications conform with the NRC guidance presented in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" published in the Federal Register (58 FR 39132). During development of NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," the NRC issued a letter dated May 9, 1988, from Thomas E. Murley (NRR) to Walter S. Wilgus (B&W Owners Group) which identified seismic and meteorological instrumentation as Limiting Conditions for Operation (LCO) which may be relocated to licensee-controlled documentation contingent upon NRC staff approval of the location of and controls over relocated requirements. Through this submittal, PSE&G is requesting implementation of the NRC's recommendations regarding seismic and meteorological technical specifications. Relocation of these Technical Specifications, with the exception of the Special Report requirements, to the Salem Updated Final Safety Analysis Report (UFSAR) will reduce regulatory burden. Future changes will be conducted using the 10CFR50.59 process.

III. JUSTIFICATION FOR CHANGES

The current Technical Specifications regarding seismic and meteorological monitoring instrumentation are due in part to

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NRC recommendations provided in Regulatory Guides (RG) 1.12 "Instrumentation for Earthquakes" and 1.23 "Meteorological Programs in Support of Nuclear Power Plants," respectively. As noted in 10CFR50.36, the Technical Specifications shall include surveillance requirements to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met. In addition, 10CFR50.36b specifies the inclusion of requirements for reporting and keeping records of environmental data, and any conditions and monitoring requirements for the protection of the nonaquatic environment.

The regulatory guidance utilized for the establishment of the subject Technical Specifications has since been reviewed by the NRC during its recent Technical Specification Improvement Program (TSIP). The purpose of the TSIP was to identify Technical Specifications that could be eliminated or relocated in order to decrease equipment degradation and alleviate unnecessary personnel burden while improving or maintaining plant safety. The NRC staff concluded that if an LCO does not meet any one of four criteria as set forth in the Policy Statement (58 FR 39132), then that LCO and its associated Surveillance Requirements and Bases sections may be proposed for removal from the Technical Specifications and relocated to a licensee-controlled document(s). The NRC further clarified its application of the four criteria as imposing those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

As provided by the NRC in the Policy Statement (58 FR 39132), neither the seismic or meteorological instrumentation are considered:

- ⌘ Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary,
- ⌘ A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier,

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- ⌘ A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier,
- ⌘ A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

While the meteorological instrumentation is significant to public health and safety in regards to supporting Emergency Preparedness and Radiological Assessment, it does not provide constraints of prime importance in limiting the likelihood or severity of analyzed reactor accident scenarios. As established by the NRC in determining those specifications which may be relocated to licensee-controlled documentation, PSE&G believes that this submittal for relocating the seismic and meteorological instrumentation specifications, with the exception of the Special Report requirements, from the Technical Specifications to the Salem UFSAR is justified. The Special Report requirements will be deleted since 10CFR50.36(c)(7) will no longer be applicable to the seismic or meteorological instrumentation. These changes will reduce regulatory burden while maintaining existing levels of plant safety.

IV. DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

PSE&G has, pursuant to 10CFR50.92, reviewed the proposed amendment to determine whether our request involves a significant hazards consideration. We have determined that the operation of the Salem Generating Station Unit 1 and Unit 2, in accordance with the proposed changes:

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

The proposed changes involve no hardware changes, no changes to the operation of any systems or components, and no changes to existing structures. Neither the relocation of the seismic/meteorological specifications to the Salem UFSAR nor the elimination of the Special Report

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requirements represent changes that affect plant safety or alter existing accident analyses.

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

The proposed changes are procedural in nature concerning the operability and surveillance of instrumentation that are not safety related and will not impact the operation of any plant safety related component or equipment. Therefore, these changes will not create a new or unevaluated accident or operating condition.

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

In accordance with guidance provided by the NRC regarding the improvement of Technical Specifications (58 FR 39132), the proposed changes relocate the seismic and meteorological instrumentation portion of the Technical Specification, with the exception of the Special Report requirements, to the Salem UFSAR. These instruments are not safety related and do not have any associated safety margins which could be affected by this change.

V. CONCLUSIONS

Based on the above, PSE&G has determined that the proposed changes do not involve a significant hazards consideration.