

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

OCT 11 1994

NLR-N94149
LCR 93-28

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

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

The proposed request changes the Limiting Condition for Operation (LCO) 3/4.4.4 (for both units) by adding the phrase "capable of being powered from an emergency power supply" to the Limiting Condition for Operation statement. This request also proposes to change the frequency of surveillance requirement 4.4.4.2 (for both units) from 92 days to every refueling outage. As discussed in Attachment 1 to this letter, PSE&G's conclusion is that granting this request would not involve a significant hazards consideration. Attachment 2 contains the Technical Specifications marked up pages.

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.

Sincerely,



210072

9410240065 941011
PDR ADOCK 05000272
P PDR

Adol
11

OCT 11 1994

Document Control Desk
NLR-N94149

2

Attachment (2)

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

Mr. Kent Tosch, Manager, VI
New Jersey Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

NLR-N94149
LCR 93-28

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 No. 1, are true to the best of my
knowledge, information and belief.



Subscribed and Sworn to before me
this 7 day of October, 1994



Notary Public of New Jersey

My Commission expires on _____

BARBARA A. POWELL
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 2, 1998
ID # 2160323

I. DESCRIPTION OF THE PROPOSED CHANGES

**IA Proposed change to Limiting Condition for Operation (LCO)
3/4.4.4 (for both units)**

The pressurizer shall be OPERABLE with a water volume of less than or equal to 1650 cubic feet (92% indicated level), and at least two groups of pressurizer heaters each having a capacity of 150 kw and capable of being powered from an emergency power supply.

**IB Proposed change to surveillance requirement 4.4.4.2
(for both units)**

The capacity of each of the above required groups of pressurizer heaters shall be verified by measuring circuit current at least once each refueling outage.

II. REASON FOR THE PROPOSED CHANGES

IIA

The proposed change to LCO 3/4.4.4, as described in section IA above, is intended to clarify all requirements needed to consider the Pressurizer operable. The proposed change is consistent with NUREG 1431, Standard Technical Specifications Westinghouse Plants, issued on September 1992.

IIB

The proposed change to surveillance requirement 4.4.4.2 is consistent with guidance of NUREG 1366 (Improvements to Technical Specifications Surveillance Requirements, published December 1992), and Generic Letter 93-05 (Line-Item Technical Specifications improvements to Reduce Surveillance Requirements for Testing During Power Operation, issued on September 27, 1993).

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

IIIA

The proposed change clearly states that the required heater group must be capable of being powered from an emergency power supply. As presently written, the LCO does not include this requirement as part of the LCO itself. Consequently, the Pressurizer could be considered operable without having the capability of powering the required heater group from an emergency power source, as intended by the basis of the Technical Specifications and clearly stated in LCO's Action Statement. ACTION (a) partially states that with an inoperable emergency power supply, operation may only continue for 72 hours.

Therefore, the proposed change will correctly relocate the operability requirement to the LCO statement rather than in its action statement.

IIIB

As stated in the NUREG 1366 (Improvements to Technical Specifications Surveillance Requirements, published December 1992), most pressurizer heaters are in constant use, both the variable and to some extent the back-up heaters. In addition, the pressurizer heaters have a history of being reliable, and the purpose of this surveillance requirement is to demonstrate that the capacity of the heaters has not degraded. Therefore, based on the heater reliability the 92 day surveillance frequency requirement seems to be excessive.

The Salem Station Pressurizer heaters are electric immersion heaters. The pressurizer has seventy eight (78) vertically mounted immersion heaters. The total heater capacity of 1800 KW is divided among the one (1) variable group (415KW) and two (2) backup groups (21/11 group - 415KW and 22/12 group - 969 KW). Variable control heaters are used during steady state operations to compensate for ambient heat losses in the pressurizer and the continuous bypass spray flow. The backup group heaters are used during initial heatup (bubble drawing) coming from refueling outages and during reactor coolant system transients to aid the variable heaters. The design of the Salem Station Pressurizer heaters is identical to that described in the NUREG, and the extension of the surveillance requirement is a recognized enhancement and assurance to the continued reliability of the pressurizer heaters.

IV. DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The discussion below applies to both proposed changes.

This proposed Amendment request:

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

The request (both proposed changes) does not change any assumption or parameter assumed to function in any of the design/licensing basis analysis.

The proposed change as described in section IA merely relocates the requirement to supply emergency power to the required heater group from the action to the LCO statement.

The change as described in section IB does not eliminate the surveillance requirement, but extends its frequency from 92 days to once per refueling outage in accordance with NRC recommendation. The design of the Salem Station Pressurizer heaters is identical to that described in the NUREG 1366 (Improvements to Technical Specifications Surveillance Requirements, published December 1992), and Generic Letter 93-05 (Line-Item Technical Specifications improvements to Reduce Surveillance Requirements for Testing During Power Operation, issued on September 27, 1993), and the extension of the surveillance requirement is a recognized enhancement and assurance to the continued reliability of the pressurizer heaters.

Based upon the above, PSE&G concludes that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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.

NLR-N94149
LCR 93-28

ATTACHMENT 1

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

As stated in response to question number 1 above, the request does not change any assumption or parameter assumed to function in any of the design/licensing basis analysis. One change merely relocates a requirement from one section of the LCO to another, and the second change incorporates the recommendations and enhancements as stated in NUREG 1366 and GL 93-05.

Consequently, PSE&G concludes that the change does not involve a significant reduction in any margin of safety.

NLR-N94149
LCR 93-28

ATTACHMENT 2

Insert A

The pressurizer shall be OPERABLE with a water volume of less than or equal to 1650 cubic feet (92% indicated level), and at least two groups of pressurizer heaters each having a capacity of 150 kw and capable of being powered from an emergency power supply.

Insert B

The capacity of each of the above required groups of pressurizer heaters shall be verified by measuring circuit current at least once each refueling outage.