

State of New Jersey Department of Environmental Protection

Robert C. Shinn, Jr. Commissioner Division of Environmental Safety, Health, and Analytical Programs Radiation Protection Programs Bureau of Nuclear Engineering CN 415 Trenton, New Jersey 08625-0415 Tel (609) 987-2032 Fax (609) 987-6354

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U.S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555

Ladies & Gentlemen:

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PDR

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Subject: Salem Units 1 & 2 -- Reactivity Control System Technical Specifications Limiting Conditions of Operation (LCO) Request for License Amendment to Facility Operating License Nos DPR-70 & DPR-75 -- LCR 93-19

By letter to the U.S. Nuclear Regulatory Commission (NRC), dated November 18, 1994, Public Service Electric and Gas Company (PSE&G) proposes to revise said Technical Specifications for boration flow paths and charging pumps, by reducing the minimum number of operable charging pumps required for boron addition in Mode 4 (hot shutdown) from two to one as permitted in the cases of Mode 5 (Cold Shutdown) & Mode 6 (Refueling). The stated justification for the PSE&G change request is to make the technical specifications consistent with (a) the current specifications for the Emergency Core Cooling System (ECCS), (b) with the limitations of the Cold Overpressure Protection analysis, and (c) consistent with the LCO of Salem Unit 2.

The boron injection system ensures that negative reactivity control is available during each mode of facility operation.

Per current licensing basis, at Reactor Cooling System (RCS) average temperature $\geq 200^{\circ}$ F a minimum of two injection flow paths are <u>required</u> to ensure single functional capability in the event an assumed failure renders one of the flow paths inoperable. During Mode 4, the RCS average temperature is between 200° and 350°F. For RCS average temperature $\leq 200^{\circ}$ F, { Mode 5 (Cold Shutdown) & Mode 6 (Refueling) } a minimum of one of the boron injection flow path options is required to be operable. The 350°F RCS average temperature corresponds to an operation status where the reactor reverts from critical to subcritical. The proposed changes will impose additional conditions, provide clarifications, and bring consistency to the technical specifications documents of both Salem units.

The New Jersey Department of Environmental Protection's and Bureau of Nuclear Engineering has reviewed the request in accordance with the requirements of 10 CFR 50.91(b) and has the following comment:

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<u>Page 4, 2nd paragraph of Attachment 1 of the Proposed</u> <u>Technical Specification Change Request</u>. In the middle of the page, reference to "Table 3.1-2" probably meant to be to Figure 3.1-2, as no Table 3.1-2 could be located in the current Salem Unit 1 Technical Specifications document.

If you have any questions, please contact Ariadni Kapsalopoulou at (609) 987-2052 or Suren Singh at (609) 987-2039.

Sincerely,

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Kent Tosch, Manager Bureau of Nuclear Engineering

c. J. Lipoti, Ph.D., Assistant Director Radiation Protection Programs, NJDEP

> D. Chawaga, State Liaison Officer - Region I U.S. NRC

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C. Marschall, Artificial Island Senior Resident Inspector U.S. NRC

F. Thomson, Manager Licensing and Regulation, PSE&G

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