



PSE&G

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Nuclear Business Unit

AUG 25 1995

LR-E95129

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

Gentlemen:

**PUBLIC SERVICE ELECTRIC AND GAS COMPANY
SALEM AND HOPE CREEK GENERATING STATIONS
DOCKET NOS. 50-272, 50-311 AND 50-354
NON-EMERGENCY EVENT NOTIFICATION - 10 CFR 50.72**

Public Service Electric and Gas Company (PSE&G) is requesting the NRC's concurrence with our interpretation that certain State imposed environmental notification requirements for minor non-radiological discharges to the environment do not require a 4-hour report to the NRC Operations Center via the Emergency Notification System in accordance with 10 CFR 50.72. This position is based on guidance provided in the second draft of NUREG-1022, Rev. 1, Event Reporting Guidelines.

Background

In accordance with 10 CFR 50.72(b)(2)(vi), PSE&G is required to report "any event or situation, related to the health and safety of the public or on-site personnel or protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made." The previously cited version of NUREG-1022 provides examples and clarifications intended to set a reporting threshold that ensures necessary reporting, while minimizing unnecessary reporting. Furthermore, following the guidance in this NUREG, PSE&G previously sought and received an interpretation from the NRC in October 1992 that reporting of minor non-radioactive, on-site chemical spills was not required. This interpretation was limited to chemical spills reported to the State of New Jersey under the Discharge Prevention, Control and Countermeasure (DPCC) regulations. A copy of the Commission's approval letter is attached for your information.

Discussion

PSE&G believes this interpretation of 10 CFR 50.72(b)(2)(vi) notification requirements for minor chemical spills is applicable to other government agency reporting requirements for minor non-radiological environmental events. More specifically, PSE&G believes the following types of events do not require notification to the NRC Operations Center:

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- Minor exceedances of New Jersey opacity standards for diesel generators and auxiliary boilers. Opacity is the visual measurement of emissions (smoke) from a combustion source. PSE&G is planning to increase the frequency of opacity observations in conjunction with New Jersey's implementation of the Facility-wide operating permit program mandated by the new Clean Air Act Amendments.

- Minor exceedances of New Jersey Pollutant Discharge Elimination System (NJPDES) permit effluent limitations for conventional, non-toxic pollutants, e.g., residual chlorine, suspended solids, temperature and sewage limits.

PSE&G believes that these types of events are below the reporting threshold established in the draft NUREG and will not cause heightened public or government concern related to the radiological health and safety of the public or on-site personnel or protection of the environment.

Conclusion

In accordance with the guidance provided in draft NUREG-1022, PSE&G proposes to remove these environmental events from the 4-hour notification requirements for both Salem and Hope Creek Stations. Under this proposal, PSE&G would continue to notify the NRC of all other environmental events which require press releases or government agency notifications or items of significant interest to the public.

PSE&G requests that the NRC review and approve this proposed change to the 4-hour notification requirements at your earliest convenience. If you have any questions on the information provided, please feel free to contact Jim Eggers at (609) 339-1339.

Sincerely,



J. A. Benjamin

Director -

QA/Nuclear Safety Review

Attachment (1)

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