



PSE&G

Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038-0236

Nuclear Business Unit

SEP 06 1995

LR-N95106

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

Gentlemen:

CLARIFICATION LETTER
TECHNICAL SPECIFICATION AMENDMENTS 166/148
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

This letter documents the telecon between Public Service Electric & Gas Company (PSE&G) and NRC - Salem Senior Project Manager on June 29, 1995. By letter dated May 3, 1995, Amendments 166/148 were transmitted to PSE&G. These amendments added a new action statement to Technical Specification (T.S.) 3.1.3.2.1, "Position Indicating Systems - Operating." During Station Operations Review Committee (SORC) review of amendment implementation readiness, a concern was raised with respect to a statement made in the "Determination of No Significant Hazards Consideration" section of PSE&G letter dated August 19, 1994 (our Ref: License Change Request 94-30).

The specific concern was that in LCR 94-30, the statement is made that "The change...incorporates into the applicable LCO the action statement which is already taken under technical specification 3.0.3, and does not alter the operator response or response time" and that NRC may have approved the amendment without fully appreciating the difference between T.S. 3.0.3 action and the newly proposed action for LCO 3.1.3.2.1.

SORC recognized that the overall operator response and response time was not altered within the 7 hours allowed by either 3.0.3 or the new Limiting Condition for Operation (LCO) action statement. However, the actions to be taken (operator response) within the first hour of the total allowed may not be the same. Specifically, Technical Specifications 3.0.3 requires that, during the first hour, actions be initiated (showing intent) to place the unit in a non-applicable Mode versus the new action statement which allows the first hour to correct the condition.

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As a result of this concern, on June 29, 1995, a telecon took place between PSE&G Nuclear Business Unit (NBU) representatives and the NRC - Salem Project Manager which confirmed that the NRC had a clear understanding of the actions that the NBU will take when this action statement is entered.

Also in the NRC's Safety Evaluation Report (SER), the following statement is made: "The proposed change specifies an action statement that has the same effect as TS 3.0.3...." This further demonstrates that the NRC understood the slight difference between T.S. 3.0.3 and the new LCO action statement.

Additionally, because the NRC's SER did not include the specific words relative to operator response and response time, those words (including their literal meaning) were not used as a basis for NRC approval of LCR 94-30. PSE&G is currently licensed to the statement in the NRC's SER and not the statement as written in the Determination of No Significant Hazards Consideration.

In conclusion, if two or more rod position indicators per bank are inoperable for one hour (i.e., cannot be restored within the first hour), then the unit will be placed in HOT STANDBY within the following 6 hours. This action has the same effect as if TS 3.0.3 had been entered (i.e., 7 hours total to HOT STANDBY).

Should there be any questions with regard to this submittal, please do not hesitate to contact us.

Sincerely,


J. A. Benjamin
Director - QA/
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