

Public Service  
Electric and Gas  
Company

Louis F. Storz

Senior Vice President - Nuclear Operations

Public Service Electric and Gas Company

P.O. Box 236, Hancocks Bridge, NJ 08038

609-339-5700

JAN 11 1996

LR-N95092  
LCR S95-13 (Salem)  
LCR H95-06 (Hope Creek)

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

Gentlemen:

**LICENSE AMENDMENT APPLICATION TO  
CHANGE SECTION 6.0, ADMINISTRATIVE CONTROLS,  
OF SALEM GENERATING STATION UNITS 1 AND 2  
AND HOPE CREEK GENERATING STATION  
FACILITY OPERATING LICENSE NUMBERS DPR-70, DPR-75, AND NPF-57  
DOCKET NOS. 50-272, 50-311, AND 50-354**

In accordance with the requirements of 10CFR50.90, Public Service Electric and Gas Company (PSE&G) hereby transmits a request for an amendment to the Facility Operating Licenses DPR-70 and DPR-75 for Salem Generating Station, Unit Nos. 1 and 2, and NPF-57 for Hope Creek Generating Station. A copy of this amendment request has been sent to the State of New Jersey pursuant to 10CFR50.91(b)(1).

The proposed changes revise Section 6.0 (Administrative Controls) of the Salem and Hope Creek Generating Stations Technical Specifications to: 1) relocate the requirements of Section 6.5 (Station Operations Review Committee, Nuclear Safety Review and Audit, and Technical Review and Control) to the Quality Assurance Program, 2) replace specific management titles with generic management functional positions, 3) change Operating Engineer to Assistant Operations Manager, 4) require a Senior Reactor Operator license be held by either the Operations Manager or one of the Assistant Operations Managers, and 5) correct some typographical errors in Section 6.0. The relocation of Section 6.5 is being made to provide for more effective operation of the review committees in focusing on review of issues that impact safety. This change also reduces unnecessary administrative burden on both the Public Service Electric & Gas (PSE&G) Nuclear Business Unit and the NRC staff.

Based upon the justification provided, PSE&G has concluded that the proposed changes do not involve a significant hazard consideration pursuant to 10CFR50.92.

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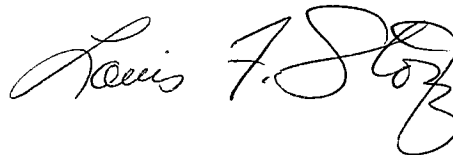
Attachment 1 contains a detailed description of the proposed changes, justification for the changes, and a no significant hazards consideration evaluation. Attachment 2 contains marked up Salem Unit 1 Technical Specification pages which reflect the proposed changes. Attachment 3 contains marked up Salem Unit 2 Technical Specification pages which reflect the proposed changes. Attachment 4 contains marked up Hope Creek Technical Specification pages which reflect the proposed changes.

This amendment request does not incorporate our April 13, 1994 request for changes to the Quality Assurance audit frequencies for Salem Units Nos. 1 and 2 and Hope Creek (Salem LCR 94-10, Hope Creek LCR 94-05, letter LR-N94051). Should the changes requested in LR-N94051 be approved prior to the changes requested by this submittal, the applicable pages of this submittal should be changed to reflect the approved LR-N94051 changes; otherwise, the changes will be incorporated into the applicable sections in their relocated location.

Upon NRC approval of these proposed changes, PSE&G requests that the amendment be made effective within 60 days following the review and approval of the PSE&G 10CFR50.54(a) submittal reflective of this amendment request.

Should you have any questions or comments on this submittal, please do not hesitate to contact us.

Sincerely,



Affidavit  
Attachments (4)

JAN 11 1996

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LR-N95092

3

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

Mr. L. Olshan, Licensing Project Manager - Salem  
U. S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Mail Stop 14E21  
Rockville, MD 20852

Mr. D. Jaffe, Licensing Project Manager - Hope Creek  
U. S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
Mail Stop 14E21  
Rockville, MD 20852

Mr. C. Marschall (X24)  
USNRC Senior Resident Inspector

Mr. R. Summers (X24)  
USNRC Senior Resident Inspector

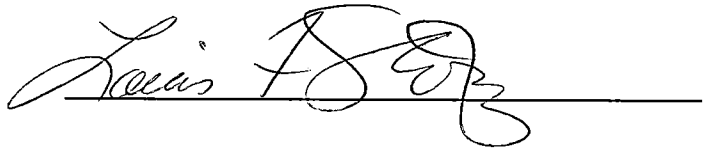
Mr. Kent Tosch, Manager, IV  
Bureau of Nuclear Engineering  
33 Arctic Parkway  
CN 415  
Trenton, NJ 08625

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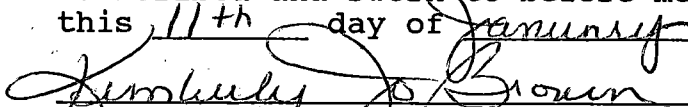
STATE OF NEW JERSEY            )  
  )    SS.  
COUNTY OF SALEM                )

L. F. Storz, being duly sworn according to law deposes and says:

I am Senior 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, Units No. 1 and No. 2, and Hope Creek Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me  
this 11<sup>th</sup> day of January, 1996



Notary Public of New Jersey

KIMBERLY JO BROWN  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires April 21, 1998

My Commission expires on \_\_\_\_\_

**ATTACHMENT 1**  
**PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS**

**LICENSE AMENDMENT APPLICATION  
TO CHANGE THE ADMINISTRATIVE CONTROLS  
SECTION OF SALEM GENERATING  
STATION UNITS 1 AND 2 AND  
HOPE CREEK GENERATING STATION  
FACILITY OPERATING LICENSE NUMBERS DPR-70, DPR-75, AND NPF-57  
DOCKET NOS. 50-272, 50-311, AND 50-354**

**LR-N95092  
Salem LCR 895-13  
HCGS LCR H95-06**

**I. DESCRIPTION OF THE PROPOSED CHANGES**

The proposed amendment revises the Administrative Controls Section (6.0) of the Technical Specifications for the Salem Generating Station, Unit Nos. 1 and 2, and the Hope Creek Generating Station. The proposed changes involve relocating Section 6.5, Review and Audits, to the plant Quality Assurance (QA) Program. Section 6.5 includes the requirements for the Station Operating Review Committee (SORC), the Offsite Safety Review Group, and the On Site Safety Review Group. At Public Service Electric & Gas (PSE&G) the Offsite Safety Review Group and the On Site Safety Review Group is encompassed by Nuclear Safety Review (NSR). The proposed amendment also changes specific management titles in a manner that will eliminate the need for future changes that are titular in nature and corrects some typographical errors in the Salem and Hope Creek index and Section 6.0 of the Hope Creek Technical Specifications. An additional change involves changing the title of Operating Engineer to Assistant Operations Manager and a modification that will require that a Senior Reactor Operator (SRO) license be held by either the Operations Manager or one of the Assistant Operations Managers.

A change identification number is assigned to each change being proposed. The change numbers appear on the marked-up Technical Specification pages presented in Attachments 2 (Salem Unit 1), 3 (Salem Unit 2), and 4 (Hope Creek). The proposed changes are intended to reduce future unnecessary administrative burden on both the Public Service Electric & Gas (PSE&G) Nuclear Business Unit and the NRC staff.

## **II. JUSTIFICATION FOR THE PROPOSED CHANGES**

One element of the proposed changes is the relocation of Section 6.5, Review and Audits, of the Salem and Hope Creek Administrative Controls Section. Included in the relocated section are sections 6.5.1, Station Operations Review Committee; 6.5.2, Nuclear Safety Review and Audit; and 6.5.3, Technical Review and Control. The relocation will remove the requirements of the SORC and NSR from the Technical Specifications. The changes being proposed by this request are purely administrative in nature and do not extend to Technical Specifications sections beyond Section 6.0. The relocation of Section 6.5 also provides consistency with NUREG-1431, Standard Technical Specifications - Westinghouse Plants, for Salem and NUREG-1433, Standard Technical Specifications - General Electric Plants BWR/4, for Hope Creek.

Additional changes being requested are related to PSE&G's organizational configuration and reflect titular changes. In order to reduce future unnecessary administrative burden on both the licensee and the NRC staff, specific management titles are being removed and replaced with generic positions. These changes are so identified and categorized as administrative in nature. These proposed changes eliminate the need to change the generic management positions through a License Change Request but maintain the ability to determine responsibilities. It is also being requested that specifications 6.2.2.f (Salem) and 6.3.3 (Hope Creek) be modified to state that a Senior Reactor Operator license must be held by either the Operations Manager or the Assistant Operations Manager. In addition, it is proposed that the title of Operating Engineer be changed to Assistant Operations Manager.

The proposed changes are grouped and presented according to the following categories: 1) Relocated Requirements; and 2) Administrative Changes.

### **Relocated Requirements**

The proposed change described in this section involves removing the requirements of section 6.5, Audits and Reviews, from the Technical Specifications by relocating them to the PSE&G Quality Assurance (QA) Program. The PSE&G QA Program is documented in Chapter 17 of the Salem and Hope Creek Updated Final Safety Analysis Reports (UFSAR). Changes to the QA program as a result of the relocated Technical Specification requirements will be documented by a separate submittal.

**ATTACHMENT 1  
Changes to Section 6.0  
Administrative Controls**

**LR-N95092  
Salem LCR 895-13  
HCGS LCR H95-06**

- 1) Salem Specification 6.5 and Hope Creek Specification 6.5.1, Review and Audits, is relocated to the QA Program.

The requirements specified in section 6.5 of the Administrative Controls Section of the Salem and Hope Creek Technical Specifications do not meet the criteria set forth in the Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, and therefore may be relocated to an appropriate licensee controlled document. These requirements are not required by 10CFR50.36 and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

Change 1 involves relocating the requirements for the SORC, NSR and Audit, and Technical Review and Control. These requirements are relocated to the PSE&G QA Program. The relocation of these requirements from the Administrative Controls Section to the PSE&G QA Program does not eliminate any requirements. Instead, the requirements are relocated to another more appropriate document which has sufficient controls in place to manage implementation and future changes (i.e., 10CFR50.54(a)(3) and 10CFR50.59). Changes are also made to sections 6.8.2 and 6.8.3 to delete references to section 6.5. The relocation of the identified requirements will enable PSE&G to more efficiently maintain the requirements under existing regulations and reduce the need to request Technical Specification changes for issues which do not affect public safety.

Administrative Changes

The following proposed changes are administrative in nature and do not affect assumptions contained in the plant safety analysis, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions.

- 2) Replace the specific management title of "General Manager - Salem Operations" with the generic position of "plant manager" in Specifications 6.1.1 and 6.2.1.b for Salem. Replace the specific management title of "General Manager - Hope Creek Operations" with the generic position of "plant manager" in Specifications 6.1.1, 6.2.1.b and on page 6-2 for Hope Creek.

**ATTACHMENT 1  
Changes to Section 6.0  
Administrative Controls**

**LR-N95092  
Salem LCR 895-13  
HCGS LCR H95-06**

- 3) Replace the specific management title of "Chief Nuclear Officer and President - Nuclear Business Unit" with the generic position of "senior corporate nuclear officer". This change is made in Specifications 6.1.2, 6.2.1.c, 6.6.1.b, 6.7.1.b and 6.7.1.d for Salem and in Specifications 6.1.2, 6.2.1.c, 6.6.1.b, 6.7.1.a and 6.7.1.c for Hope Creek.
- 4) Replace the specific management title of "Director - Quality Assurance and Nuclear Safety Review" with the generic position of "senior management position with responsibility for independent nuclear safety assessment activities and quality program oversight". This change is made in Specifications 6.7.1.b and 6.7.1.d for Salem and in Specifications 6.7.1.a and 6.7.1.c for Hope Creek.

Changes 2, 3 and 4 are made to preclude future administrative changes by using a generic management position instead of a specific management title. Specifying a specific management title within the Technical Specifications creates a licensee and NRC burden when titles are changed. The specific titles and responsibilities of key organization positions are specified in the PSE&G UFSAR and/or the QA Program. The change to generic management positions still retains the ability to determine Technical Specification related management responsibilities. Since changes to the UFSAR are controlled by 10CFR50.59 and changes to the QA Program are controlled by 10CFR50.54(a)(3), equivalent and adequate control is provided. A similar change to specific management titles appearing in Section 6.0, submitted by Rochester Gas & Electric, has recently been reviewed and approved by the NRC.

Occurrences of the specific management titles of "General Manager - Salem Operations", "General Manager - Hope Creek Operations", "Chief Nuclear Officer and President - Nuclear Business Unit", and "Director - Quality Assurance and Nuclear Safety Review" appearing in Section 6.5 are not changed since this section is to be relocated outside of Technical Specifications. The title changes will be made in their new location.

- 5) This change deals with the correction of a number of typographical errors in Section 6.0 for Salem and Hope Creek.

Salem Unit 1 page XV is revised to correct a typographical error in the specification number.



**ATTACHMENT 1  
Changes to Section 6.0  
Administrative Controls**

**LR-N95092  
Salem LCR 895-13  
HCGS LCR H95-06**

Hope Creek page xxiv is revised to correct the designation of Figure 6.2.2-2, Minimum Shift Crew Composition Single Unit Facility, to Table 6.2.2-1.

Hope Creek page xxvi is revised to correct the title of RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT to RADIOACTIVE EFFLUENT RELEASE REPORT.

Hope Creek page 6-16, section 6.8.4.a, is revised to correct a typographical error on the word "shall".

Hope Creek page 6-24, sub-section 6.13.2.1.a, is typed twice. This proposed change deletes the incorrect redundancy.

- 6) This change involves modifying specifications 6.2.2.e, 6.2.2.f and 6.3.1 of the Salem Technical Specifications and specifications 6.3.2 and 6.3.3 of the Hope Creek Technical Specifications.

Specifications 6.2.2.f (Salem) and 6.3.3 (Hope Creek) state that the Operations Manager shall either hold an SRO license or have held an SRO license on a similar unit. The proposed change consists of modifying this specification to state that either the Operations Manager or Assistant Operations Manager shall hold an SRO license. Specification 5.2.2.f of NUREG-1431 and NUREG-1433, Revision 1, states that a Senior Reactor Operator (SRO) license shall be held by either the Operations Manager or Assistant Operations Manager. The proposed change states the an SRO license must be held by either the Operations Manager or Assistant Operations Manager.

Specifications 6.2.2.e (Salem) and 6.3.2 (Hope Creek) require that, along with others, an SRO license must be held by the Operating Engineer. The organization at Salem and Hope Creek is undergoing changes, one of which is changing the title of the Operating Engineer to Assistant Operations Manager. The proposed change is to delete "Operating Engineer" from these specifications. The deletion is justified by the change described above that requires either the Operations Manager or Assistant Operations Manager to hold an SRO license.

**ATTACHMENT 1  
Changes to Section 6.0  
Administrative Controls**

**LR-N95092  
Salem LCR 895-13  
HCGS LCR H95-06**

As stated in Chapter 13 of the Salem and Hope Creek UFSARs, the Operations Manager is responsible for managing, directing, and controlling the activities of the respective Operations Department. The Operations Manager ensures that plant operation complies with the facility operating license, Technical Specifications, and all government regulations and company policies. This individual ensures that a properly trained, licensed, and nonlicensed staff is available to provide safe and efficient operation. The Operations Manager is assisted by the Assistant Operations Manager(s) (formerly the Operating Engineer) and other supervisory personnel. The Assistant Operations Manager(s) report directly to the Operations Manager. An Assistant Operations Manager will assume the authority and responsibility of the department in the absence of the Operations Manager and assists the Operation Manager in the implementation of this individual's responsibilities by directing and controlling the work of the department.

The Operations Manager does not perform any of the requirements of 10CFR50.54 for which an SRO license is required (i.e., directing the licensed activities of licensed operators, stationed at the controls, observation of core alterations, etc.). The Assistant Operations Manager(s) (formerly the Operating Engineer), rather than the Operation Manager, are normally more directly involved in the daily interface with the operating crews.

Additional credence that an SRO license is not necessarily required of the Operations Manager is provided by ANSI/ANS 3.1, "American National Standard for Selection, Qualification and Training of Personnel for Nuclear Power Plants". Hope Creek is committed to ANSI/ANS 3.1-1981 while Salem is committed to its predecessor ANSI N18.1-1971. Salem amendments 110 and 89 and Hope Creek amendment 56 took exception to the applicable ANSI Standard by stating that the individual designated as the operations manager would meet or exceed the minimum qualifications of the applicable ANSI Standard except as modified by the appropriate specification. The appropriate specification (6.2.2.f for Salem and 6.3.3 for Hope Creek) was modified to state that the Operations Manager shall either hold or have held an SRO license on a similar unit. These amendments were approved on the basis that a direct report to the Operations Manager, the Operating Engineer (now the Assistant Operations Manager), is required to hold an SRO license. The 1993 version of ANSI/ANS 3.1

**ATTACHMENT 1**  
**Changes to Section 6.0**  
**Administrative Controls**

**LR-N95092**  
**Salem LCR 895-13**  
**HCGS LCR H95-06**

also recognizes that an SRO license is not necessarily required of the Operations Manager provided a subordinate, directly reporting position requiring an SRO license exists (i.e., the Operations Middle Manager). At Salem and Hope Creek the Assistant Operations Manager is considered equivalent to the Operations Middle Manager.

It is also proposed to change Salem specification 6.3.1 to note an exception to ANSI N18.1-1971 for the qualifications of the Operations Manager. The exception taken is presently addressed by the note at the bottom of page 6-7 which can be removed when Salem specifications 6.3.2 and 6.3.3 are created by renumbering 6.2.2.e and 6.2.2.f, respectively. The change also provides consistency between Salem and Hope Creek specification 6.3.

**III. NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION**

Public Service Electric & Gas has, pursuant to 10CFR50.92, reviewed the proposed amendment to determine whether the request involves a significant hazards consideration. We have determined that operation of the Salem and Hope Creek Generating Stations in accordance with the proposed changes:

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

A portion of the proposed changes involves the relocation of the requirements for the Station Operations Review Committee, Nuclear Safety Review and Audit, and Technical Review and Control. These requirements are contained in Administrative Controls Section 6.5 of the Salem and Hope Creek Technical Specifications. The requirements to be relocated do not meet the criteria set forth in the Commission's Final Policy Statement for inclusion in Technical Specifications and therefore, may be relocated to an appropriate licensee controlled document (i.e., the Quality Assurance Program). Another element of the proposed change involves a modification which consists of stating that either the Operations Manager or Assistant Operations Manager shall hold a Senior Reactor Operator (SRO) license and replacing the title of Operating Engineer with Assistant Operations Manager.

The requirements being changed are not required by 10CFR50.36 and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. The changes are consistent with NUREG-1431 and NUREG-1433, Revision 1, and have been previously evaluated by the NRC. The remaining portions of the proposed changes consist of management title changes, including changing Operating Engineer to Assistant Operations Manager, and correction of typographical errors.

All of the proposed changes are administrative in nature and do not affect assumptions contained in the plant safety analysis, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. Implementation of these changes is expected to enable PSE&G and the NRC to focus on requirements important to safety. Therefore, the proposed changes will not involve a significant increase in the probability or consequences of an accident previously evaluated.

**ATTACHMENT 1  
Changes to Section 6.0  
Administrative Controls**

**LR-N95092  
Salem LCR 895-13  
HCGS LCR H95-06**

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

The proposed changes are purely administrative and do not involve changes to operating procedures or physical modifications to the plants. Therefore, the proposed changes will not create the possibility of a new or different type of accident from any accident previously evaluated.

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

The changes discussed herein will not involve a significant reduction in a margin of safety since the proposed changes do not eliminate any existing Technical Specification requirements. All requirements removed from Technical Specifications are relocated to another licensee controlled program (i.e., the Quality Assurance Program). The Quality Assurance Program is controlled by existing regulations which provide a more appropriate vehicle for addressing changes and compliance. There are no administrative control requirements removed from the Technical Specifications which are not addressed by other, regulations and regulatory requirements (i.e., 10CFR50 Appendix B, 10CFR50.59, 10CFR50.54(a), and NUREG-0737).

Prior to this proposed change it was a Technical Specification requirement that the Operating Engineer hold an SRO license. Specification 5.2.2.f of NUREG-1431 and NUREG-1433, Revision 1, states that an SRO license shall be held by either the Operations Manager or Assistant Operations Manager. The Operating Engineer and Assistant Operations Manager are equivalent positions at Salem and Hope Creek. Chapter 13 of the respective plant's Updated Final Safety Analysis Report, states that the Operations Manager is assisted by the Assistant Operations Manager (formerly the Operating Engineer) and other supervisory personnel. The Assistant Operations Manager reports directly to the Operations Manager and will assume the authority and responsibility of the department in the absence of the Operations Manager. The title change from Operating Engineer to Assistant Operations Manager, reflects the organizational changes underway at Salem and Hope Creek. The duties and responsibilities associated with the two positions are identical. The option that either the Operations Manager or Assistant Operations Manager hold an SRO license is consistent with prior approved amendments for Salem and Hope Creek. These amendments were approved based on the fact that the organizational structure contained a direct report to the

**ATTACHMENT 1  
Changes to Section 6.0  
Administrative Controls**

**LR-N95092  
Salem LCR 895-13  
HCGS LCR H95-06**

Operations Manager that is be required to hold an SRO license. With the proposed change either the Operations Manager or a direct report, (i.e., Assistant Operations Manager) is required to hold an SRO license. The change is also consistent with the 1993 version of ANSI/ANS 3.1, "American National Standard for Selection, Qualification and Training of Personnel for Nuclear Power Plants", and NUREG-1431 and 1433, Revision 1. This change will not involve a significant reduction in a margin of safety since it is still required that either the Operations Manager or Assistant Operations Manager holds an SRO license.

The other management title changes also will not involve a significant reduction in a margin of safety since all organizational responsibilities are and will continue to be implemented in accordance with applicable requirements.

The proposed changes are administrative in nature and do not relate to or modify a margin of safety defined and maintained by the Technical Specifications. Therefore, the proposed changes will not involve a significant reduction in a margin of safety.

**IV. CONCLUSIONS**

Based on the information presented above, PSE&G has concluded that there is no significant hazards consideration associated with the proposed changes to the Salem and Hope Creek Technical Specifications.