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Electric and Gas
Company

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**REQUEST FOR ONE-TIME CHANGE TO TECHNICAL SPECIFICATIONS
CONTROL ROOM EMERGENCY AIR CONDITIONING SYSTEM
SALEM GENERATING STATION NO. 2
FACILITY OPERATING LICENSE DPR-75
DOCKET NO. 50-311**

Gentlemen:

In accordance with 10CFR50.90, Public Service Electric & Gas (PSE&G) Company requests a revision to the Technical Specifications (TS) for the Salem Generating Station Unit No. 2. In accordance with 10CFR50.91(b)(1), a copy of this submittal has been sent to the State of New Jersey.

The proposed TS change modifies on a one-time basis Specification 3.7.6, "Control Room Emergency Air Conditioning System." This change revises the specification's applicability to include only MODES 1, 2, 3 and 4.

PSE&G has undertaken a substantial upgrade of the Control Room Emergency Air Conditioning System (CREACS). The current two unit outage, with Salem Units 1 and 2 completely de-fueled, presents a unique opportunity to effectively implement the necessary technical improvements. PSE&G requests this one-time change to permit Core Alterations of Salem Unit 2 with the CREACS inoperable. This will provide additional time to complete the CREACS upgrade and allow for submittal of a separate permanent TS change to reflect the upgrade of CREACS.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and PSE&G has concluded that this request involves no significant hazards considerations.

The basis for the requested change is provided in Attachment 1. A 10CFR50.92 evaluation with a determination of no significant

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hazards consideration is provided in Attachment 2. The marked up TS page affected by the proposed change is provided in Attachment 3.

Upon NRC approval of this proposed change, PSE&G requests that the amendment be made effective on the date of issuance, but allow an implementation period of ten days to provide sufficient time for associated administrative activities. Approval of the one-time change is requested by June 21, 1996 to support the reloading of fuel for Salem Unit No. 2, which is currently scheduled to begin on July 3, 1996. The requested one-time change will remain in effect until Salem Unit No. 2 reaches Mode 4, which is currently scheduled for August 1, 1996.

Should you have any questions regarding this request, we will be pleased to discuss them with you.

Sincerely,



Affidavit
Attachments (3)

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**SALEM GENERATING STATION UNIT NO. 2
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ONE-TIME CHANGE TO TECHNICAL SPECIFICATIONS
CONTROL ROOM EMERGENCY AIR CONDITIONING SYSTEM**

REQUESTED CHANGE AND PURPOSE

This requested one-time change involves revising the Applicability statement of Salem Unit 2 Technical Specification (TS) 3.7.6, Control Room Emergency Air Conditioning System (CREACS), to include only Modes 1, 2, 3 and 4. This proposed TS change will modify the Modes 5 and 6 Applicability statement on a one-time basis thereby permitting Core Alterations at Salem Unit 2 prior to the completion of the substantial Control Room and CREACS upgrade. This will provide additional time to complete the CREACS upgrade and allow for submittal of a separate permanent TS change to reflect the upgrade of CREACS. The one-time change will expire following the completion of the system upgrade and the unit's restart from the current extended outage, specifically entry into Mode 4.

BACKGROUND

Public Service Electric & Gas (PSE&G) is presently in a two unit outage in which Salem Units 1 and 2 are totally de-fueled. Recent events at Salem Unit 1 have resulted in a shift in restart priorities, placing the emphasis on the restart of Salem Unit 2. Taking advantage of the two unit outage, PSE&G has undertaken a substantial upgrade of the CREACS for Salem Units 1 and 2.

The current schedule for restarting Salem Unit 2 has resulted in the desire to refuel Salem Unit 2 prior to completion of the CREACS upgrade. The Applicability statement of Salem Unit 2 CREACS TS 3.7.6 includes Modes 5 and 6 which would not allow Core Alterations with an inoperable CREACS. Therefore, a one-time TS change is being proposed.

As described in Section 9.4.1 of the Salem Updated Final Safety Analysis Report (UFSAR), the Control Area Air Conditioning System (CAACS) is designed to maintain room temperatures within limits required for operation, maintenance and testing of plant controls and uninterrupted safe occupancy during post-accident conditions. The system operates during normal or emergency conditions, including during and following a seismic event as required to meet the design basis.

A portion of the CAACS, designated the CREACS, is a safety related system designed to maintain the habitability of the

Control Rooms for Salem Units 1 and 2 in the event of an accident. The CREACS design originally included two separate trains, and a single train was associated with each respective Salem Unit 1 or 2 Control Room. Each train contains high-efficiency particulate air (HEPA) and charcoal filters, and a cooling coil. The Unit 1 CREACS supplied the Control Room and adjacent offices for Unit 1 and the corridor between the Unit 1 and Unit 2 Control Room. The Unit 2 CREACS supplied the Control Room for Unit 2. An evaluation was performed in 1991 regarding the leaktight integrity of the wall separating the Unit 1 and 2 control rooms. It was determined that the Control Room Envelope (CRE) should be defined as a common area that includes both control room areas supplied by both CREACS trains.

The CREACS upgrade will result in a system design that has the capability of treating and cooling the air for a CRE that includes both Control Rooms. A permanent change to the CREACS TS is being proposed by a separate request to support the system upgrade. The Salem CREACS, however, will be rendered inoperable during the upgrade.

PSE&G has reviewed the functional capability of the CAACS during Modes 5 and 6, and determined that a one-time change to the Applicability statement of the Salem Unit 2 CREACS TS can be proposed that would allow Core Alterations to proceed with the CREACS inoperable for both Salem Units while the modifications are being completed.

JUSTIFICATION OF REQUESTED CHANGES

As stated in the Bases for TS 3.7.6, the operability of the CREACS ensures that (1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for equipment and instrumentation cooled by the CREACS and (2) the Control Room will remain habitable for operations personnel during and following all credible accident conditions. While the CREACS is inoperable, the following justifies the one-time change based on controlling ambient air temperature using the CAACS and maintaining habitability of the Salem Unit 2 CRE during and following all credible accident conditions.

AMBIENT AIR TEMPERATURE

While the upgrade to CREACS is being completed, the CAACS from Salem Units 1 and/or 2 will be available and functional to maintain CRE ambient air temperatures. The CAACS is safety related, seismically qualified and capable of being powered from the Emergency Diesel Generators. The CAACS is designed to maintain the CRE ambient temperature within comfortable levels for control room personnel during normal operation. This

temperature is 76 Degrees F at 50% Relative Humidity. In addition, an acceptable upper temperature limit for the CRE has been defined as 85 Degrees F per UFSAR Subsection 3.11.1.3 to ensure margin exists for instrument accuracy. Therefore, although the equipment in the CRE has been designed to withstand a temperature of 110 Degrees F without loss of safety function, 85 Degrees F will be maintained in the CRE while the CREACS is inoperable.

Under accident conditions, cooling of the CRE would usually be provided by the CREACS cooling coil supplying the CRE. The CAACS would continue to supply the relay rooms, data logging rooms and control equipment rooms under accident conditions. The data logging rooms are being included in the CRE as part of the modification. During Modes 5 and 6 while the CREACS modifications are being completed, the CRE that would normally be cooled by the CREACS in accordance with plant TS will be cooled by the CAACS during normal and accident conditions.

The CAACS will be maintained functional while modification to the CREACS is ongoing to provide cooling during normal operation in Modes 5 and 6 and under postulated accident conditions. Should the temperature in the CRE exceed allowable levels (85 Degrees F), administrative controls will be in place to restore the temperature to within acceptable levels, and prevent any Core Alteration activities or positive reactivity changes until the temperature is restored to acceptable levels. Core Alterations or positive reactivity changes will not be permitted until temperature levels are restored within allowable levels with CAACS. Administrative controls will be in place to monitor Control Room temperature to ensure temperature is maintained less than or equal to 85 Degrees F.

Therefore, the CAACS will maintain the current TS Bases requirement of the CREACS that the ambient air temperature does not exceed the allowable temperature for continuous duty rating for equipment and instrumentation cooled by the system for the combined CRE. PSE&G will ensure that appropriate procedural controls are in place to provide guidance for CAACS system operation during Modes 5 and 6 with CREACS under modification as discussed above. The procedural guidance will also address the administrative controls to be implemented as discussed in the following Habitability section.

HABITABILITY

The isolation and filtering functions of the CREACS protect Control Room operators from the consequences of certain postulated accidents. Specifically, by shifting to the recirculation (Accident-Inside Air) mode, the CREACS protects

Control Room operators from airborne radiation, toxic fumes, hazardous chemicals, and smoke from external fires. The events evaluated in UFSAR Chapter 15 which remain credible with Salem Unit 2 in Modes 5 and 6 or Salem Unit 1 in a de-fueled condition are fuel handling accidents (Section 15.4.6), waste gas releases (Section 15.3.6), liquid waste releases (Section 15.3.7), uncontrolled boron dilution (15.2.4), and loss of off-site power (Section 15.2.9). In addition, other credible internal or external events that could impact CRE habitability were also evaluated. Each of these accidents are addressed in the following paragraphs.

Evaluation of UFSAR Chapter 15 Events

PSE&G has conducted an engineering evaluation to assess the radiological consequences of postulated fuel handling accidents at Salem Units 1 and 2 while the CREACSS for both units are out of service while the ongoing system upgrade is being completed.

The design criteria for CREACS radiological consequences is General Design Criteria (GDC) 19 which states:

"Adequate radiation protection shall be provided to permit access and occupancy of the Control Room under accident conditions without personnel receiving radiation exposures in excess of 5 rem whole body, or its equivalent to any part of the body, for the duration of the accident."

The calculations performed as part of the engineering evaluation for a fuel handling accident are conservative in that no credit was taken for iodine removal by filtration, which would be expected if the accident were to occur in either Fuel Handling Building (FHB). Fuel movement inside the FHB is restricted in accordance with plant TS unless FHB ventilation is operable. In addition, no credit was taken for prompt radiation detection and the control of containment building penetrations, as required by TS during Core Alterations or movements of irradiated fuel within containment. Although the fuel to be reloaded into the Salem Unit 2 core has decayed for approximately ten months, it was conservatively assumed that the fuel to be reloaded into the Salem Unit 2 core has decayed for only six months. The calculations indicate that the whole body gamma dose, beta skin dose, and thyroid dose at the CAACS air intakes are negligible compared to the respective GDC 19 limits (5 rem, 30 rem and 30 rem, respectively). In addition, isolation of the air intakes was not assumed for this accident scenario. Therefore, with the CREACS out of service for Salem Unit 1 and 2 and no isolation of the air intakes assumed, the requirements of GDC 19 will continue to be met in the event of a fuel handling accident at Unit 1 or 2, and CRE habitability will be maintained.

Other UFSAR Chapter 15 accidents evaluated include waste gas releases and liquid waste releases. Calculations indicate the CREACS is not needed to provide protection against postulated waste gas decay tank or volume control tank ruptures. Liquid waste, particularly with the decay period since plant operation, cannot cause an airborne radiation problem of sufficient magnitude to threaten CRE habitability. No credit was assumed for filtration of the release by the Auxiliary Building Ventilation System as part of this analysis. Therefore, for these two events, the requirements of GDC 19 will continue to be met.

UFSAR Section 15.2.4 evaluates the potential uncontrolled boron dilution event during refueling operations. In summary, the UFSAR states that sufficient operator time (approximately 41 minutes) is available to recognize a high count rate signal indicative of a reduction in boron concentration, and isolate the reactor makeup water source before the reactor would become critical. Plant TS requirements during Modes 5 and 6 ensure sufficient shutdown margin is maintained and a boration flowpath is available to control reactivity changes to prevent inadvertent criticality. Response to this event will be in accordance with existing plant operating procedures. CRE habitability with an inoperable CREACS will not be impacted as a result of an uncontrolled boron dilution event.

For a Loss of Offsite Power (LOOP) event, the CAACS is powered from Class 1E vital busses and the air conditioning portion of this system will continue to operate to maintain CRE temperature as discussed above. Potential radiological concerns associated with this event will be bounded by the fuel handling accident evaluation discussed above. Therefore, the requirements of GDC 19 will be satisfied without the CREACS operable, and CRE habitability will be maintained.

Other Events

In addition to the above, the following potential events could possibly impact CRE habitability and were reviewed to assure there is no credible threat with a reasonable potential of exposing operators to unacceptable conditions.

Event

Fuel Handling Accident (Hope Creek)
Liquid and Gaseous Waste Releases (Hope Creek)
Loss of Coolant Accident (LOCA) (Hope Creek)
Chemical Storage
Barge Collision
Control Room Internal Fire
Control Room External Fire

Loss of Spent Fuel Pool Cooling
Loss of Decay Heat Removal

Fuel Handling Accident (Hope Creek)

Salem CREACS is not needed to provide protection from a postulated Hope Creek fuel handling accident. Although Hope Creek is currently operating, the radiological dose to Salem control room personnel would be within GDC 19 limits in the event of a fuel handling accident at Hope Creek.

Liquid and Gaseous Waste Releases (Hope Creek)

A comparison of Hope Creek UFSAR Table 15.7-3, "Off-Gas Treatment System Failure - Radiological Effects," and Table 15.7-8, "Fuel Handling Accident (Design Basis Analysis) Radiological Effects," indicates that the radiological consequences in the Salem CRE of a gaseous radwaste subsystem leak or failure at Hope Creek are less severe than the radiological consequences of a fuel handling accident at Hope Creek. The CREACS at Salem is not needed to provide protection against a postulated fuel handling accident at Hope Creek. Therefore, the system is also not needed to provide protection for a postulated gaseous subsystem leak or failure.

Hope Creek UFSAR Sections 15.7.2 and 15.7.3 indicate that an analysis of the effects of a liquid radwaste tank failure is not required per NRC Standard Review Plan (NUREG-0800) guidance.

LOCA (Hope Creek)

An evaluation was performed regarding impact of a postulated Hope Creek LOCA on the Salem Control Room. The evaluation concluded radiological dose to Salem Control Room personnel would be within GDC 19 limits with the CREACS inoperable. In arriving at this conclusion, the evaluation considered the redundancy and reliability of the Hope Creek Filtration Recirculation and Ventilation System (FRVS), the strength and low-leakage nature of the Reactor Building, and the small angle that would be required for a Hope Creek release to be transported to Salem intakes. This analysis used source terms consistent with the recommendations of Regulatory Guide 1.3. In addition, this analysis assumed that the CAACS outside air intake ductwork will be isolated and an unfiltered leak rate of 1000 cfm would occur. PSE&G will maintain the CAACS outside air intakes either isolated, or capable of being isolated manually from the control room or by manually closing the dampers in the event of a Hope Creek LOCA. The Hope Creek Event Classification Guide (ECG) requires notification of the Salem Control Room in the event of an emergency that has the potential to result in a radioactive release. The Salem Control Room will isolate the outside air

intakes if isolation has not already been accomplished.

Chemical Storage

Engineering evaluations had been conducted on storage of hazardous chemicals at both Salem and Hope Creek. These evaluations document the technical basis for CRE habitability. Only one chemical source, dispersion of the contents of a delivery tanker of 15 wt. percent ammonium hydroxide, could result in accumulation in the Salem Control Room above the limits of Regulatory Guide 1.78. Salem has sufficient onsite quantities of ammonium hydroxide that additional deliveries are not needed until Salem Unit 2 is on-line, after the CREACS upgrade is completed. Therefore, the possible event which might impact the CRE (rupture of an ammonium hydroxide tanker) will be precluded by administrative controls such that no ammonium hydroxide tanker deliveries will be allowed during the CREACS upgrade period.

Accumulation of toxic levels in the CRE for the other hazardous chemicals were determined to be below the NRC criteria or were qualitatively evaluated as no concern due to the chemical dispersion, high toxicity threshold, or container size. Included in this evaluation were the nitrogen tube trailers and replacement refrigerant for Hope Creek chillers. These calculations also showed Regulatory Guide 1.78 limits would not be exceeded. Since the CREACS will be out of service for an extended period, chronic criteria of OSHA standards were reviewed for applicability. In all cases, it was determined that chronic criteria would not be exceeded.

Barge Collisions

As discussed in UFSAR Section 2.2.3 and SER Supplement 3 dated December 29, 1978, numerous studies performed over years of operation at Salem have indicated that barge collisions, groundings, or other mishaps which could threaten CRE habitability are extremely remote. Evaluation of hazardous chemicals shipped past Salem Units 1 and 2 has determined that CRE habitability would not be impacted should a catastrophic release of hazardous chemicals occur. The capability to remote manually isolate the air intakes from the control room or close the dampers manually will be maintained as discussed above in the discussion concerning a Hope Creek LOCA.

Control Room Internal Fire

An internal fire may cause evacuation of the CRE with or without CREACS operable. The CAACS will remain in operation during completion of the CREACS modifications. Therefore, the CAACS will be operable to provide purging of the CRE in the event of a

fire inside the Control Room. At the same time, since the space is continuously manned by numerous individuals, there is little likelihood of an undetected fire starting and spreading requiring evacuation. Should this occur, existing evacuation plans and procedures will be followed to ensure the plants are maintained in a safe shutdown condition via local operation of equipment.

In addition to the above, all work in the CRE associated with the upgrade will be conducted under hot-work permits and related hot-work procedures which provide an added measure of fire prevention.

Control Room External Fire

External fires (including marsh fires) which present hazards to CRE habitability are considered extremely remote in that the fire would need to be of sufficient magnitude to generate a great deal of smoke and the wind would have to be of sufficient strength and direction to cover all potential Control Room air inlet openings with smoke. If an external fire is detected, operator action will be taken to isolate the CRE from outside air (if not already isolated per discussion of Hope Creek LOCA) and CAACS would remain available. In the unlikely event that the CRE would become uninhabitable due to smoke in the atmosphere, evacuation procedures would be followed as in the case of the internal fire.

As in the case of potential internal fires, any hot work in plant areas will be conducted with adherence to procedures for hot-work. These permits and procedures provide added measure of fire prevention within these areas that may impact CRE habitability.

Loss of Spent Fuel Pool Cooling

Calculations have been performed, based on the amount of time the present spent fuel has decayed, and support that the maximum temperature of the pool would not exceed 182 Degrees F should a complete loss of forced cooling occur. Under these conditions, operator actions currently specified in existing procedures include (1) providing up to 15 gpm of make-up water, and (2) operating at least one FHB exhaust fan. Both of these operator actions can be accomplished from outside of the Control Room, if necessary. Should both FHB exhaust fans be lost, approximately 2 days are available before pool temperatures increase to where ventilation is needed to remove moisture from the FHB atmosphere. This would allow sufficient time to restore ventilation to the area. Therefore, a radioactive release resulting from a loss of spent fuel pool cooling that could impact CRE habitability is not expected to occur.

Loss of Decay Heat Removal

In response to NRC Generic Letter 88-17, PSE&G implemented procedural and hardware enhancements to address potential loss of decay heat removal concerns. In summary, adequate monitoring capability and procedural guidance exist to identify and respond to a loss of the Residual Heat Removal System and ensure the capability to makeup Reactor Coolant System inventory should a loss of shutdown cooling occur. Therefore, a radioactive release resulting from a loss of decay heat removal which could impact CRE habitability is not expected to occur.

CONCLUSIONS

The above discussions provide adequate justification for a one-time TS change that permits Core Alterations for Salem Unit 2 with an inoperable CREACS during completion of the ongoing system upgrades. The design basis functions of the CREACS will continue to be accomplished, as described previously, such that (1) ambient air temperature does not exceed the allowable temperature for continuous duty rating for equipment and instrumentation cooled by the system per the TS Bases, and (2) the Control Room will remain habitable for operations personnel during and following all credible accident conditions during Modes 5 and 6. The radiological limits of GDC 19 will continue to be met with the CREACS inoperable.

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ONE-TIME CHANGE TO TECHNICAL SPECIFICATIONS
CONTROL ROOM EMERGENCY AIR CONDITIONING SYSTEM**

10CFR50.92 EVALUATION

Public Service Electric & Gas (PSE&G) has concluded that the proposed change to the Salem Generating Station Unit No. 2 Technical Specification (TS) does not involve a significant hazards consideration. In support of this determination, an evaluation of each of the three standards set forth in 10CFR50.92 is provided below.

REQUESTED CHANGE

The requested one-time change involves revising the applicability of TS 3.7.6, Control Room Emergency Air Conditioning System (CREACS), for Salem Unit 2 to permit refueling of Salem Unit 2 with the CREACS inoperable in Modes 5 and 6. The one-time change will expire following the completion of the in-progress Control Room and CREACS upgrade and the restart and entry into Mode 4 of Unit 2 from the current outage.

BASIS

1. The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The CREACS is not an accident initiator. CREACS functions post-accident to provide cooling for Control Room equipment and habitability for operations personnel. Therefore, CREACS has no influence on the probability of any of the previously evaluated accidents or the other events evaluated as listed below.

Event

Fuel Handling Accident (Salem)
Waste Gas or Volume Control Tank Failures
Uncontrolled Boron Dilution
Loss of Offsite Power
Fuel Handling Accident (Hope Creek)
Liquid and Gaseous Waste Releases (Hope Creek)
Loss of Coolant Accident (LOCA) (Hope Creek)
Chemical Storage
Barge Collision
Control Room Internal and External Fire
Loss of Spent Fuel Pool Cooling

Loss of Decay Heat Removal

The Control Area Air Conditioning System (CAACS) and other measures will be available to maintain Control Room Envelope (CRE) ambient temperatures and habitability.

The proposed one-time change does not impact the consequences of an accident previously evaluated based on the following discussions.

The fuel has decayed to such low levels for more than six months that doses associated with the fuel handling accident are well within the limits of GDC 19. There is insufficient activity remaining in either gaseous waste storage or liquid waste storage to force a Control Room evacuation. In the event of a Loss of Offsite Power (LOOP), uncontrolled boron dilution event, loss of spent fuel pool cooling or loss of decay heat removal, CREACS is not required in Modes 5 or 6 to mitigate the consequences of this event and CRE habitability will be maintained.

For a Hope Creek fuel handling accident, gaseous radwaste release or LOCA, dose to Salem Control Room personnel will not exceed GDC 19 limits. PSE&G will maintain the CAACS outside air intakes either isolated or capable of being isolated in the event of a Hope Creek LOCA. The Hope Creek Event Classification Guide (ECG) requires notification of the Salem Control Room in the event of an emergency that has the potential to result in a radioactive release. The Salem Control Room will isolate the outside air intakes if isolation has not already been accomplished.

For the other events evaluated, the need for evacuation is not considered credible for any event with the exception of an internal or external fire. However, the possibility of evacuation of the CRE in the event of an internal or external fire would be no different whether or not CREACS is operating. In the event of an internal fire, CAACS will remain in operation to provide purging of the CRE. For the case of a possible external fire, the need for evacuation is not considered credible because of the short duration of the CREACS outage and improbability of the factors which are necessary to require an evacuation of the Control Room (i.e. wind direction, wind speed, amount of smoke). If an external fire is detected, operator action will be taken to isolate the CRE from outside air while CAACS remains available. In the unlikely event that the Control Room would become uninhabitable due to smoke in the atmosphere, evacuation procedures would be followed as in the case of the internal fire.

The one chemical storage type event which might impact the Control Room, rupture of an ammonium hydroxide tanker, is precluded by administrative controls such that no ammonium hydroxide tanker deliveries will be allowed during the system upgrade period.

The CAACS will maintain the current design function and TS Bases requirements of the CREACS that the ambient air temperature does not exceed the allowable temperature for continuous duty rating for equipment and instrumentation cooled by the system for the combined CRE. The CAACS will be maintained functional while modification to the CREACS is ongoing to provide cooling during normal operation and under postulated accident conditions. Should the temperature in the CRE exceed allowable levels (85 Degrees F), administrative controls will be in place to require restoration of the temperature to within acceptable levels using CAACS, and prevent any Core Alteration activities or positive reactivity changes until the temperature is restored to acceptable levels.

Therefore, the proposed one-time TS change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The CREACS is not an accident initiator. CREACS functions post-accident to provide cooling for Control Room equipment and habitability for operations personnel. Therefore, CREACS inoperability during Modes 5 and 6 will not result in the creation of a new or different kind of accident from any accident previously evaluated. All pertinent accidents have been assessed and no other scenarios dealing with fuel movement, or the need for an operable CREACS in Mode 5 or 6, have been deemed credible.

Therefore, the proposed one-time change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed change does not involve a significant reduction in a margin of safety.

The proposed one-time change does not significantly reduce the margin of safety as defined in the Bases for the TS because (1) there is no credible event as analyzed in Salem

UFSAR Chapter 15 which can cause an unacceptable environment in the CRE since the fuel has been decaying for at least six months, (2) fuel movement inside the Fuel Handling Building (FHB) is restricted in accordance with plant TS unless FHB ventilation is operable, (3) dose to Salem control room personnel from a potential Hope Creek fuel handling accident, gaseous radwaste release or Loss of Coolant Accident will not exceed GDC 19 limits, (4) the one event which might impact the Control Room, rupture of an ammonium hydroxide tanker, is precluded by administrative controls such that no ammonium hydroxide tanker deliveries will be allowed during the CREACS upgrade period, and (5) in the unlikely event that Control Room evacuation is required, there is no impact on operator ability to mitigate the consequences of an accident in the current plant configuration.

Therefore, the proposed one-time TS change does not involve a significant reduction in the margin of safety.

CONCLUSION

Based on the above, PSE&G has determined that the proposed one-time change does not involve a significant hazards consideration.