

**SALEM GENERATING STATION
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311
CHANGE TO FACILITY OPERATING LICENSE
AND TECHNICAL SPECIFICATIONS**

BASIS FOR REQUESTED CHANGE

REQUESTED CHANGE AND PURPOSE

The changes identified on Attachment 3 will remove the indicated License Condition from the Facility Operating License for Salem Unit 2. This is TMI Action Plan Item I.A.1.3 - Shift Manning. Specifically, the condition states, "PSE&G shall establish regularly scheduled 8-hour shifts without reliance on routine use of overtime by June 3, 1981." PSE&G is proposing to delete this license condition. PSE&G is also proposing to modify Technical Specifications (TS) Section 6.0 Administrative Controls to incorporate shift manning and limits on overtime. This will allow the continued use of a regularly scheduled 12-hour shift rotation without routine heavy use of overtime. In addition, TS 6.2.2.d identifies that PSE&G's limits on overtime are defined in Generic Letter 82-12.

BACKGROUND

PSE&G has established a 12-hour shift schedule for the Hope Creek Nuclear Station. This schedule was approved by the NRC in Amendment 41 to the Hope Creek TS. PSE&G has also established a 12-hour shift rotation for Salem Nuclear Generating Station. However, it has been identified that the Salem Unit 2 Facility Operating License DPR-75 contains a license condition that stipulates 8-hour shifts. PSE&G is proposing to delete this license condition and incorporate the requirements with a change to 12-hour shifts into the Administrative Controls section of TS.

Salem Units 1 and 2 are currently shutdown and defueled. PSE&G will continue to operate on the established 12-hour schedule. Transition to a different shift rotation at this time would disrupt the current outage schedule and affect the manpower available to augment outage support.

JUSTIFICATION OF THE REQUEST CHANGE

12-hour shifts provide for a reduced number of turnovers which allows for better communications and continuity. Shifts are trained as a team, and a change to 8-hour shifts would disrupt the team concept that has been established.

The current 12-hour shift schedule has enjoyed a high-degree of acceptance among shift personnel, both workers and supervision alike. On the 12-hour shift schedule, personnel receive more consecutive time off, therefore, they are more rested when returning to work. There is less changing of shifts and therefore, personnel have sufficient time to adjust to the changes.

The change to the specifications will not allow routine use of overtime. In addition, TS 6.2.2.d identifies PSE&G's limits on overtime. The specification refers to Generic Letter 82-12 which defined appropriate limits on overtime for operating personnel. The limits specified in the generic letter are defined in PSE&G Nuclear Business Unit's Administrative Procedures.

CONCLUSION

Based on the above discussions and the no significant hazards consideration determination presented in Attachment 2, PSE&G has determined that the proposed changes do not adversely affect or endanger the health or safety of the general public or involve a significant safety hazard and are therefore acceptable.

**SALEM GENERATING STATION UNITS 1 AND 2
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311
CHANGE TO FACILITY OPERATING LICENSE
AND TECHNICAL SPECIFICATIONS**

10CFR50.92 EVALUATION

Public Service Electric & Gas Company (PSE&G) has concluded that the proposed changes to the Salem Generating Station Unit 2 Facility Operating License and to the Salem Units 1 and 2 Technical Specifications(TS) do 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 proposed change to the Salem Unit 2 Facility Operating License deletes license condition 2.C(24)(a) Shift Manning. This condition, TMI Action Plan item I.A.1.3, required PSE&G to establish regularly scheduled 8-hour shifts without reliance on routine use of overtime by June 3, 1981. PSE&G initially complied with the condition as required, however, PSE&G has since established a 12-hour shift rotation that does not rely on regularly scheduled overtime. PSE&G is also proposing to modify Salem Units 1 and 2 TS, Section 6.0 Administrative Controls, to incorporate shift manning while changing from 8-hour to 12-hour shifts.

BASIS

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

The proposed change does not involve a physical or procedural change to any structure, system, or component that significantly affects the probability or consequences of any accident or malfunction of equipment important to safety previously evaluated in the Updated Final Safety Analysis Report (UFSAR). The proposed changes will permit the use of 12-hour shifts which average 40 hours per week and also satisfy the guideline in Generic Letter 82-12 for operating shifts.

This change is administrative in nature and has no significant impact on the probabilities or consequences of any evaluated accident or malfunction of safety important equipment.

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

The proposed revision involves no physical changes in the plant or to the manner in which plant systems are operated. The change modifies the working hours per shift for operating personnel without significantly changing the hours worked per week and retains the current limitations on excessive overtime. The proposed changes are administrative in nature; therefore, no new or different accident is created.

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

This is an administrative change and does not affect any margins of safety. Plant operation with the proposed revision to shift working hours has been found to improve operator morale and performance.

CONCLUSION

Based on the above discussion, PSE&G has determined that the proposed changes do not involve a significant hazards consideration.

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Attachment 3

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ADMINISTRATIVE CONTROLS

6.2.2 FACILITY STAFF

The facility organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1X. ←
- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room area at all times.
- c. All CORE ALTERATIONS shall be observed and directly supervised by a licensed Senior Reactor Operator who has no other concurrent responsibilities during this operation.
- d. The amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).
- e. The Operating Engineer, Senior Nuclear Shift Supervisors, and Nuclear Shift Supervisors shall each hold a senior reactor operator license. The Nuclear Control Operators shall hold reactor operator licenses.
- f. The Operations Manager shall meet one of the following:
 - (1) Hold an SRO license.
 - (2) Have held an SRO license for a similar unit (PWR).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective is to have operating personnel work a nominal 40-hour week while the unit is operating.

(21) Sump Performance (Section 6.3.3, Supplement 5)

- (a) Prior to resuming power operation following the first refueling outage, PSE&G shall provide a detailed survey of insulation materials.
- (b) Prior to operation above five percent power, control room operators shall be trained in the recognition and mitigation of LPI performance degradation.

(22) Radiation Protection Organization (Section 12.0, Supplement 5)

PSE&G shall complete the reorganization actions and programs associated with radiation protection no later than November 1, 1981.

(23) Category I Masonry Walls (Section 3.8.3, Supplement 5)

- (a) Prior to operation above five percent power, PSE&G shall submit the information requested in the NRC letter dated January 8, 1981.
- (b) Prior to startup following the first refueling, PSE&G shall resolve the difference between the staff criteria and the criteria used by PSE&G to the satisfaction of the NRC and implement the required fixes that might result from such a resolution.

(24) TMI Action Plan Conditions (Section 22.2, Supplement 5)

Unless otherwise noted, each of the following conditions references the appropriate section of Supplement No. 5 to the Safety Evaluation Report (NUREG-0517) for the Salem Nuclear Generation Station, Unit 2, dated January 1981 and shall be completed to the satisfaction of the NRC by the times indicated.

(a) DELETED

~~(a) Shift Manning (Section 22.2, I.A.1.3)~~

~~PSE&G shall establish regularly scheduled eight-hour shifts without reliance on routine use of overtime by June 3, 1981.~~

(b) Short-Term Accident Analysis and Procedure Revision (Section 22.2, I.C.1 and I.C.8)

The operators shall be briefed on the revisions to the emergency operation instruction within 30 effective full power days of operation.

ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The General Manager - Salem Operations shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Senior Nuclear Shift Supervisor or, during his absence from the Control Room, a designated individual shall be responsible for the Control Room command function. A management directive to this effect, signed by the Chief Nuclear Officer and President - Nuclear Business Unit, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Salem Updated Final Safety Analysis Report and updated in accordance with 10 CFR 50.71(e).
- b. The General Manager - Salem Operations shall be responsible for overall facility safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plants.
- c. The Chief Nuclear Officer and President - Nuclear Business Unit shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plants to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 FACILITY STAFF

The Facility organization shall be subject to the following:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1. *INSERT 1*

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ADMINISTRATIVE CONTROLS

~~FACILITY STAFF~~ (Continued)

- b. At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, at least one licensed Senior Reactor Operator shall be in the Control Room area at all times.
- c. All CORE ALTERATIONS shall be observed and directly supervised by a licensed Senior Reactor Operator who has no other concurrent responsibilities during this operation.
- d. The amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).
- e. The Operating Engineer, Senior Nuclear Shift Supervisors, and Nuclear Shift Supervisors shall each hold a senior reactor operator license. The Nuclear Control Operators shall hold reactor operator licenses.
- f. The Operations Manager shall meet one of the following:
 - (1) Hold an SRO license.
 - (2) Have held an SRO license for a similar unit (PWR).

INSERT 1

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective is to have operating personnel work a nominal 40-hour week while the unit is operating.