

Public Service
Electric and Gas
Company

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SEP 25 1996

LR-N96291
LCR S95-02

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

REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
RELOCATION OF CONTAINMENT ISOLATION VALVE TABLE
SALEM GENERATING STATION UNITS 1 AND 2
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311

Gentlemen:

In accordance with 10CFR50.90, Public Service Electric & Gas Company (PSE&G) requests a revision to the Technical Specifications (TS) for Salem Generating Station, Unit 1 and 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 changes contained herein will remove the list of containment isolation valves located in Table 3.6-1 of specification 3.6.3 and relocate it to the Salem Updated Final Safety Analysis Report (UFSAR). In addition, references to the table in specifications 1.7, 3.6.1 and 3.6.3 are being updated. This change is being submitted in accordance with the guidance provided in NRC Generic Letter 91-08, "Removal of Component Lists from Technical Specifications."

The basis for the requested change is provided in Attachment 1. A 10CFR50.92 evaluation with a determination of no significant hazards consideration is provided in Attachment 2. The marked-up TS pages affected by the proposed change are provided in Attachment 3. Attachment 4 contains a discussion of the changes to Containment Isolation Valve Table identified during a review of the components listed in the Table and the bases for the changes.

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 sixty days to provide sufficient time for completion of administrative activities associated with implementation of all of the changes included in this request.

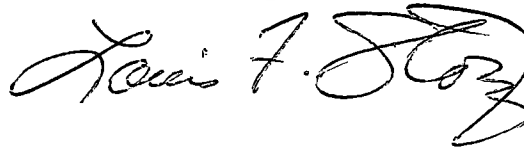
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Should there be any questions regarding this submittal, please contact us.

Sincerely,



HLO/pfr
Attachments (4)
Affidavit

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

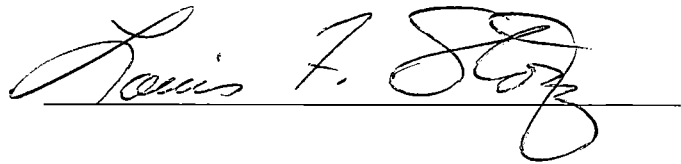
Mr. K. Tosch, Manager IV
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REF: LR-N96291


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, Unit Nos. 1 and 2, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 25th day of September, 1996



Notary Public of New Jersey

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

My Commission expires on _____

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

BASIS FOR REQUESTED CHANGE

REQUESTED CHANGE AND PURPOSE

The changes identified on Attachment 3 will implement the revisions to the Technical Specifications (TS) necessary to support relocating Table 3.6-1, "Containment Isolation Valves (CIV)," from the TS to the Salem Updated Final Safety Analysis Report (UFSAR). This request is being made in accordance with the guidance provided in Generic Letter (GL) 91-08, "Removal Of Component Lists From Technical Specifications" dated May 6, 1991.

Additional TS changes necessary to support the to relocation of Table 3.6-1 are identified below:

1. Deleting references to the table from TS 1.7, 3/4.6.1 and 3/4.6.3.
2. Adding wording to allow manual or locked closed CIVs to be opened under administrative control to TS 1.7, 3/4.6.1 and 3/4.6.3.

Basis Section 3/4.6.3 will also be revised in accordance with the guidance provided in GL 91-08.

BACKGROUND

Maintaining containment integrity prevents excessive radioactivity from passing from the containment to the atmosphere in the event of a release of radioactive material to the containment. Containment integrity is provided by the containment structure and by isolating the various penetrations that pass through the containment walls.

The CIVs are part of the containment piping penetration design. The function of these valves is to be closed or to automatically close to limit the release of radioactive fission products to the environment. TS 3/4.6.1 establishes requirements for CIVs and Table 3.6-1 specifically identifies valves for which operability ensures the ability to establish containment integrity.

Public Service Electric & Gas Company (PSE&G) is proposing to relocate the valve list to the Salem UFSAR. GL 91-08 provides guidance to licensees pursuing amendments to relocate component lists from TS. The guidance states that component lists should not be relocated to the UFSAR because the UFSAR may be out of date by as much as 18 months. At Salem, a controlled copy of the UFSAR is maintained on a computer based Document Management System (DMS). In addition, a controlled copy of all approved changes to the current revision of the UFSAR is maintained on DMS. Therefore, all approved changes to the current revision of the UFSAR are available to station personnel without waiting for the normal revision process.

This change will allow the CIV list to be updated using the 10CFR50.59 process. TS references to Table 3.6-1 have been replaced with general statements that describe the types of components to which the requirements apply. Since changes to the UFSAR will be subject to the provisions of 10CFR50.59 of the Code of Federal Regulations, adequate controls will exist to ensure that these components satisfy the applicable TS requirements.

The proposed changes remove TS Table 3.6-1 and revise TS to remove references to Table 3.6-1. The proposed changes as described will allow Table 3.6-1 to be removed from TS without altering existing TS requirements or the components to which they apply.

JUSTIFICATION OF THE REQUEST CHANGE

Relocation of Table 3.6-1 from the Salem TS to the Salem UFSAR will permit administrative control to changes to the CIV list. Currently, updating the CIV list requires prior approval by the NRC utilizing the license amendment process in accordance with 10CFR50.90. Once relocated, any change to the CIV list would be a change to the facility as described in the UFSAR and subject to the requirements of 10CFR50.59.

UFSAR Table 6.2-10 identifies all CIVs and penetrations. UFSAR Table 6.2-12 identifies those CIVs that are subject to leak rate testing and Table 6.2-13 identifies those CIVs that are not subject to leak rate testing. To implement the proposed changes, Table 6.2-10 will be revised to include information such as footnotes that are contained on TS Table 3.6-1.

Attachment 4 to this submittal contains the revisions to Table 3.6-1 and the reasons for the revisions based on a review of the components listed in the Table. This revised list will provide the input for the relocation of the Table to the UFSAR.

As stated in GL 91-08, TS may be stated in general terms that describe the types of components to which the requirements apply. This provides an acceptable alternative to identifying components by their plant identification number as currently listed on TS Table 3.6-1. The removal of the component list does not alter existing TS requirements or those components to which they apply.

GL 91-08 states that this TS change will cause the Limiting Condition for Operation (LCO) remedial actions and surveillance requirements to apply to all valves classified as CIVs by the plant licensing basis. Future changes to the CIV list will be controlled by the 10CFR50.59 review process for updating the UFSAR.

TS Table 3.6-1 identifies certain valves that may be opened during plant operation as long as the valves are administratively controlled. These valves are required to be opened for testing, maintenance, and other activities. Administrative control of these valves when opened in Modes 1 through 4 is required since closure is necessary to isolate the containment should an accident occur. TS 3.6.3 is being revised to allow manual or locked closed CIVs to be opened under administrative control. This control is provided by appropriate plant procedures. Any change to these procedures would be reviewed in accordance with 10CFR50.59.

The valve closure time requirements are maintained in the Inservice Test Program and procedures. Any changes to the closure times would be reviewed under 10CFR50.59. Therefore, relocating TS Table 3.6-1 would not alter the CIV stroke time requirements.

The proposed revision does not alter the requirements for CIV operability currently in TS. The LCO and Surveillance Requirements would be retained in the revised TS. Therefore, the proposed changes would not affect the meaning, application, and function of the TS requirements for the CIVs currently on TS Table 3.6-1.

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
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311
CHANGE TO TECHNICAL SPECIFICATIONS
CONTAINMENT ISOLATION VALVES**

10CFR50.92 EVALUATION

Public Service Electric & Gas Company (PSE&G) has concluded that the proposed changes to the Salem Generating Station 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 license amendment request proposes a revision to TS 3/4.6.3 to relocate Table 3.6-1, "Containment Isolation Valves," from the TS. The current TS requirements concerning containment isolation valves (CIV) would continue to be maintained in accordance with the revised TS 3/4.6.3. Additional TS sections and Bases sections are revised to remove reference to TS Table 3.6-1 and to clarify the administrative control requirements.

BASIS

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

The proposed changes simplify the TS, meet the regulatory requirements for control of containment isolation, and are consistent with the guidance provided in Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications." The procedural details of TS Table 3.6-1 have not been changed, only relocated to a different controlling document, the Salem Update Final Safety Analysis Report (UFSAR). The proposed changes are administrative in nature, should result in improved administrative practices, and do not affect plant operations.

The probability of occurrence of a previously evaluated accident is not increased because this change does not introduce any new potential accident initiating conditions. The consequences of an accident previously evaluated is not increased because the ability of containment to restrict the release of any fission product radioactivity to the environment will not be degraded by this change.

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

The proposed changes are administrative in nature, do not result in physical alterations or changes to the operation of the plant, and cause no change in the method by which any safety-related system performs its function. Therefore, this proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

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

The administrative change to relocate TS Table 3.6-1 to the UFSAR does not alter the basic regulatory requirements for containment isolation and will not adversely affect the containment isolation capability for credible accident scenarios. Adequate control of the content of the relocated table is assured by the 10CFR50.59 review process.

The proposed relocation of TS Table 3.6-1 does not alter the requirements for CIV operability currently in the TS. The Limiting Condition for Operation and the Surveillance Requirements would be retained in the revised TS. Therefore, the proposed changes will not affect the meaning, application, and function of the current TS requirements for the CIVs.

CONCLUSION

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