Public Service
Electric and Gas
Company

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

REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
ADOPTION OF 10CFR50, APPENDIX J, OPTION B
SALEM GENERATING STATION
FACILITY OPERATING LICENSES DPR 70 and 75
DOCKET NOS. 50-272/50-311

Gentlemen:

In accordance with 10CFR50.90, Public Service Electric & Gas (PSE&G) Company hereby requests a revision to the Technical Specifications (TS) for the Salem Generating Station (SGS). In accordance with 10CFR50.91(b)(1), a copy of this submittal has been sent to the State of New Jersey.

The proposed changes contained herein represent changes to Specifications 3/4.6.1, "Containment Integrity" (Unit 2 only), 3/4.6.1.2, "Containment Leakage," 3/4.6.1.3, "Containment Air Locks," 4.6.1.6.1, "Containment Structural Integrity," Bases for 3/4.6.1.2, "Containment Leakage," Bases for 3/4.6.1.3, "Containment Air Locks," and Bases for 3.4.6.1.6, "Containment Structural Integrity," and Administrative Controls Section 6.8, "Procedures and Programs". These changes modify the TS's to adopt Option B of 10CFR50, Appendix J, for Type B and C testing and modify the existing TS wording for the previous adoption of Option B on Type A testing. Approval of these changes is requested by March 1998 to allow sufficient time to address the first Unit 2 leak rate tests which come due in mid May under the existing Technical Specifications.

Salem Unit 2 returned from a lengthy outage in late August of 1997. The Type B and C tests were performed during this outage, but because of the length of the outage many will come due prior to the next Unit 2 refueling outage (2R10) scheduled for early 1999. Adoption of Option B of 10CFR50 Appendix J for Type B and C testing will result in most of the tests not coming due until 2R10. If Option B is not adopted, an outage would be required to meet the existing Technical Specifications. Adoption of Option B

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will still leave several tests due prior to the next scheduled outage. These may be addressed in a separate request for amendment.

The proposed changes were approved for the Peach Bottom Atomic Power Station on June 18, 1996 and for the Susquehanna Steam Electric Station on July 2, 1996. A similar license change request was issued for Hope Creek Generating Station on 9/18/97 as Amendment 104. The proposed changes have been evaluated for Salem in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c). A determination has been made that this request involves no significant hazards considerations.

The basis for the requested change is provided in Attachment 1 to this letter. The 10CFR50.92 evaluation, with a determination of no significant hazards consideration, is provided in Attachment 2. The marked up Technical Specification pages affected by the proposed changes are 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 sixty days to provide sufficient time for associated administrative activities.

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

Sincerely,

Affidavit
Attachments (3)

C Mr. H. Miller, Administrator - Region I
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REF: LR-N970663
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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 Salem Generating Station, Units 1 and 2, are true to the best of my knowledge, information and belief.

Louis F. Storz

Subscribed and Sworn to before me
this 15 day of December, 1997

Barbara A. Powell
Notary Public of New Jersey

BARBARA A. POWELL
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Dec. 2, 1998
ID # 2160323

My Commission expires on _____

SALEM GENERATING STATION
FACILITY OPERATING LICENSES DPR 70 and 75
DOCKET NOS. 50-272 and 50-311
REVISIONS TO THE TECHNICAL SPECIFICATIONS

BASIS FOR REQUESTED CHANGE

The basis for the proposed changes are described in this attachment. The content includes a discussion of the requested changes and their purpose, relevant background information, the justification for the proposed changes, and a conclusion.

REQUESTED CHANGE AND PURPOSE:

The proposed changes would implement the 10CFR50 Appendix J Option B performance based containment leak rate requirements for the Salem Generating Station (SGS) for Type B and C testing. Specific changes proposed include the following:

1. Replacing the prescriptive Appendix J requirements (Option A) with performance based Appendix J requirements (Option B) in the following Specifications:

   Specifications 4.6.1.1, "Primary Containment, Containment Integrity" (Unit 2 only), 3/4.6.1.2, "Containment Leakage", 3/4.6.1.3, "Containment Air Locks", 4.6.1.6.1, "Containment Structural Integrity", Bases for 3/4.6.1.2, "Containment Leakage", Bases for 3/4.6.1.3, "Containment Air Locks", and Bases for 3.4.6.1.6, "Containment Structural Integrity".

2. Creating a new section (6.8.4.f) to require a primary containment leakage rate testing program.

BACKGROUND:

Primary containment penetration leakage rate testing is required by 10CFR50 Appendix J and includes the performance of Type B and C local leak rate testing. The limitations on primary containment leakage rates are intended to ensure that the total containment leakage volume will not exceed the value assumed in the accident analysis at the assumed peak accident pressure. NUREG-1493, "Performance Based Containment Leak-Test Program", was published in September 1995 and provided the technical bases

for rulemaking to revise the leakage testing requirements contained in Appendix J to 10CFR50. The report contained the following findings:

1. Previous observations of insensitivity of population risks from severe reactor accidents to containment leakage rates at low levels were confirmed. The allowable leakage rate could be increased by two orders of magnitude without significantly impacting the estimates of population dose risk in the event of an accident.

2. A reduction in the frequency of testing of electrical penetrations should be possible with no adverse impact on risk. Performance based alternatives to current local leak rate testing requirements are feasible without significant risk impacts.

Appendix J to 10CFR Part 50 was revised to allow licensees the choice of complying with either new performance based containment leakage requirements (Option B) or the previously existing prescriptive requirements (Option A). Regulatory Guide (RG) 1.163, "Performance-Based Containment Leak-Test Program", was issued to provide guidance on the implementation of Option B. This regulatory guide references Nuclear Energy Institute (NEI) Guideline Document NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J".

10CFR50, Appendix J, Option B specifies that a licensee must submit an implementation plan and a request for revision to the TS's to adopt Option B. Option B also requires that the implementation document used to develop the performance-based leakage-testing program be included, by general reference, in the plant TS's. PSE&G has already implemented Option B for Type A testing at SGS and would like to implement Option B for Type B and C testing at the SGS during the first quarter of 1998. The implementation document, RG 1.163, is incorporated by general reference in the proposed SGS TS's (Section 6.8.4.f). The SGS intends to comply with the guidance of NEI 94-01 as modified by RG 1.163 and no deviations are being taken.

The NRC has provided guidance on the preparation of requests for adopting Option B of Appendix J in a letter from C. Grimes to D. Modeen dated November 2, 1995. The guidance of that letter has been used to prepare this SGS license amendment application.

JUSTIFICATION OF REQUESTED CHANGES:

The regulatory safety objective of the reactor containment design is stated in 10CFR50, Appendix A, Criterion 16, "Containment Design". The Option B performance based leakage testing approach allows test intervals to be based on component testing performance, thereby providing greater flexibility and cost benefit in implementing the safety objectives of the regulation. The Option B requirements are supported by the risk studies documented in NUREG-1493.

10CFR50 Appendix J, Option B requires that a submittal for TS revisions must contain justification, including supporting analyses, if the licensee chooses to deviate from methods approved by the Commission and endorsed by the regulatory guide. As indicated previously, SGS intends to comply with NEI 94-01 as modified by Regulatory Guide 1.163.

CONCLUSIONS:

PSE&G concludes that these proposed changes are adequately justified and result in No Significant Hazards Consideration as described in Attachment 2 of this letter.