

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

10CFR50.92 EVALUATION

Public Service Electric & Gas (PSE&G) has concluded that the proposed changes to the Salem Generating Station (SGS) Technical Specifications (TS's) 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 changes would implement the 10CFR50 Appendix J performance based containment leak rate requirements (Option B) for the SGS. This option allows utilities to extend the frequencies of Type B and C local leak rate tests (LLRT's) based on performance and design of the containment and components. 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, "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.

BASIS

1. *The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.*

Containment leak rate testing is not an initiator of any accident. The proposed changes do not make any physical changes to the containment and do not affect reactor operations or the accident analyses. Therefore, the proposed changes do not involve a significant increase in the probability of any previously evaluated accident.

Since the allowable leakage rate is not being changed and since the analysis documented in NUREG-1493, "Performance-Based Containment Leak-Test Program" concludes that the impact on public health and safety due to extended intervals is negligible, the proposed changes will not involve a significant increase in the consequences of any previously evaluated accident.

Therefore, adoption of a performance-based leakage testing requirements will provide an equivalent level of safety and 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.

No physical changes are being made to the plant, nor are there any changes being made to the operation of the plant as a result of the proposed changes. In addition, no new failure modes of plant equipment previously evaluated are being introduced.

Therefore, the proposed amendment 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 proposed changes are based on NRC-accepted provisions and maintain adequate levels of reliability of containment integrity. The performance-based approach to leakage rate testing recognizes that historically good results of containment testing provide appropriate assurance of future containment integrity. This supports the conclusion that the impact on the health and safety of the public as a result of extended test intervals is negligible. Since the analysis documented in NUREG-1493 confirms

that the performance based schedule continues to maintain a minimal impact on public risk, it can be concluded that the margin of safety is not significantly affected by the proposed changes.

Therefore, the proposed amendment will not involve a significant reduction in a margin of safety.

CONCLUSION

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