

Public Service
Electric and Gas
Company

Louis F. Storz

Senior Vice President - Nuclear Operations

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-5700

LR-N970810
LCR S95-44

JAN 08 1998

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

**SUPPLEMENTAL INFORMATION FOR
REQUEST FOR LICENSE AMENDMENT
AUXILIARY BUILDING VENTILATION
SALEM GENERATING STATION UNITS 1 AND 2
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311**

Gentlemen:

By letter dated October 24, 1997 (our Ref: LR-N97488; NRC ref: M99875/6), Public Service Electric and Gas Company (PSE&G) submitted a request to revise the Technical Specifications (TS) for Salem Generating Station Units 1 and 2. In this submittal, PSE&G requested that all Auxiliary Building Ventilation Fans (two supplies and three exhausts) be included in the Limiting Condition for Operation (LCO). Although, PSE&G identified in the Technical Specifications Bases of the original submittal (LR-N97488) that the supply fan with the autostart removed under administrative controls was operable, PSE&G did not identify this requirement in the Limiting Condition for Operation. This supplemental letter requests addition of 1) an asterisk (*) to the word OPERABLE in the LCO, and 2) its associated note at the bottom of the page.

Attachment 1 to this letter provides this additional explanation. Attachment 2 contains revised Inserts A and E, and the new marked up pages for the Limiting Condition for Operation. PSE&G has reviewed the original no significant hazards evaluation submitted in support of LR-N97488, and determined that it remains valid.

PSE&G requests that this submittal be reviewed on an expedited basis. Although this license change request is not required for compliance, it will eliminate 1) discrepancies between the actual system operations and the UFSAR description, and 2) questions concerning operability.

9801220315 980108
PDR ADOCK 05000272
P PDR

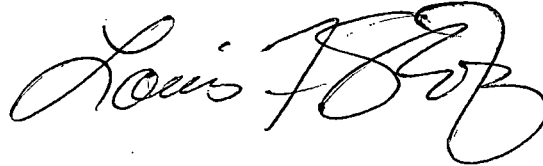
ADD 1/1



JAN 08 1998

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

Sincerely,



Affidavit
Attachments (1)

C Mr. H. Miller, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. P. Milano, Licensing Project Manager - Salem
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 14E21
Rockville, MD 20852

Ms. M. Evans (X24)
USNRC Senior Resident Inspector - Salem

Mr. K. Tosch, Manager IV
Bureau of Nuclear Engineering
PO Box 415
Trenton, NJ 08625

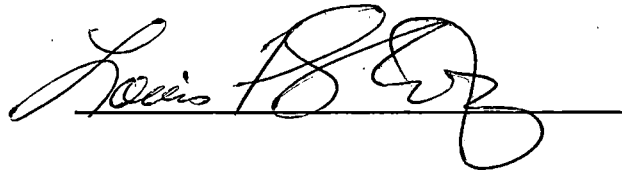


REF: LR-N970810
LCR S95-44

STATE OF NEW JERSEY)
COUNTY OF SALEM) SS.

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.



Subscribed and Sworn to before me
this 8th day of January, 1998

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 UNITS 1 AND 2
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311
AUXILIARY BUILDING VENTILATION SYSTEM (ABVS)**

I. CLARIFICATION TO ORIGINAL REQUEST

On October 24, 1997, (our ref: LR-N97488), PSE&G submitted a request to revise the Technical Specifications (TS) for Salem Generating Station Units 1 and 2. One of the proposed changes was to require both supply fans and all three exhaust fans to be operable and included in the Limiting Condition for Operation (LCO). PSE&G also stated that the supply fan start circuits would be administratively controlled to prevent more than one supply fan from operating at any time, avoiding pressurization of the Auxiliary Building. These administrative controls are contained in the Auxiliary Building Ventilation System Operation procedure, and include in part, the opening of the 125 Vdc control power to one of the supply fans. The procedure provides the operator with specific guidance on how to remove/restore the appropriate supply fan to service.

Although, in the original submittal(LR-N97488), PSE&G included statements concerning the supply fan with the autostart removed under administrative controls in the Technical Specifications Bases, PSE&G did not clearly identify in the LCO that the supply fan (with its capability to autostart removed under administrative controls) was considered operable. This supplemental letter requests addition of 1) an asterisk (*) to the word OPERABLE in the LCO, and 2) its associated note at the bottom of the page.

This submittal proposes amending Inserts A and E of LR-N97488, as follows:

Insert A / Insert E

Three Auxiliary Building exhaust air HEPA filter trains, one carbon adsorber bank, two supply fans, and three exhaust fans, shall be OPERABLE(*).

Auxiliary Building pressure shall be negative with respect to atmospheric pressure.

Where (*) is defined at the bottom of the page as follows:

(*)One of the Supply Fans may be considered OPERABLE with its start circuit administratively controlled (removed from service) to prevent more than one supply fan from operating at any time.

II. PURPOSE

The purpose of this submittal is to clearly identify within the LCO that the supply fan with its capability to autostart removed under administrative controls is considered OPERABLE.

Note that allowing a piece of equipment to be considered OPERABLE under administrative controls is already used in the Salem Technical Specifications. (see *** notation of Table 3.4-3 for both Salem Units)

III. JUSTIFICATION

The justification provided in LR-N97488 remains valid and applicable to this submittal. However, the following supplemental information is provided in support of this letter.

As stated in our original submittal, the current ABVS TS LCO does not provide sufficient control for ABVS configurations such that the postulated post-accident response of the ABVS, assuming a single failure (vital bus failure) of the fans, is in accordance with the ABV performance as described in the UFSAR. Without Technical Specification limitations for these components, single failure criteria would require that the system must be able to perform its safety function in the presence of a single failure. Applying the single failure criterion to ABVS, without having all fans in the Technical Specifications, can result in a configuration where supply fan capacity exceeds exhaust fan capability or post-LOCA temperatures can not be maintained.

The proposed change, both original and supplemented by this letter, provides explicit requirements for the ABVS to be OPERABLE such that a single failure can be accommodated (or continued operation conservatively restricted via Technical Specification Action Statements when failures can not be tolerated) and assures that negative Auxiliary Building pressure and equipment cooling are maintained. Administratively controlling the autostart capability of one of the supply fans, while considering the fan operable, does not adversely affect the ability of the ABV system to perform its safety function, specifically maintaining the required negative pressure in the building.

Each of the Salem Units have three vital buses (emergency AC power provided by diesel generators). There are two 100% capacity supply fans per Unit and three 50% capacity exhaust fans per Unit. The supply fans are powered by A and B vital buses, and the exhaust fans are powered by A, B, and C vital buses. Because of this electrical arrangement, there are no electrical single failures that can render the system unable to perform its safety function. Failure of the system to perform its safety function could result in 1) Auxiliary Building pressure greater than ambient atmospheric, which could result in the uncontrolled release of radioactive material during LOCA conditions; or 2)

overheating of ESF equipment required to mitigate the consequences of design basis accidents.

CONCLUSIONS

PSE&G review has determined that the original 10CFR50.92 evaluation of LR-N97488 remains unaffected by this letter. This letter provides additional information to clarify the statement made in our original submittal regarding administrative controls, and footnotes the word OPERABLE by adding the asterisk and its associated note.

Revised Insert A

Three Auxiliary Building exhaust air HEPA filter trains, one carbon adsorber bank, two supply fans, and three exhaust fans, shall be OPERABLE(*).

Auxiliary Building pressure shall be negative with respect to atmospheric pressure.

Revised Insert E

Three Auxiliary Building exhaust air HEPA filter trains, one carbon adsorber bank, two supply fans, and three exhaust fans, shall be OPERABLE(*).

Auxiliary Building pressure shall be negative with respect to atmospheric pressure.