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LR-N970817

United States Nuclear Regulatory Commission
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**CONTROL OF MINIMUM STAFFING REQUIREMENTS
FOR DUAL UNIT SHUTDOWN OUTSIDE OF THE CONTROL ROOM
COMMITMENT CHANGE
SALEM GENERATING STATION UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311**

Ladies and Gentlemen:

Public Service Electric and Gas (PSE&G) submitted letter NLR-N88070, dated July 15, 1988, to the NRC regarding exemptions to 10CFR50 Appendix R. In this letter, PSE&G requested an exemption (Exemption No. 2 of the letter) from Section III.G.3 of 10CFR50 Appendix R for not having a fixed fire suppression system in the Salem Unit 1 and 2 Control Room Complex. In this exemption request, PSE&G stated the following:

"A review of the staffing available and the alternate shutdown procedures have demonstrated that sufficient personnel, even at minimum Technical Specification requirements, are available to perform simultaneous alternate shutdown of both Salem Unit Nos. 1 and 2."

This exemption request was subsequently approved by the NRC on July 20, 1989. The NRC Safety Evaluation Report (SER) states the following:

"The technical requirements of Section III.G.3 are not met in the control room because of the lack of a fixed fire suppression system. The staff was originally concerned that a fire of significant magnitude could occur within the control room complex. Existing combustible materials are dispersed throughout the area. The automatic fire detection system, coupled with the continuous presence of control room operators, provides reasonable assurance that a fire will be discovered in its initial stages before significant propagation and room temperature rise occurs. At such a point in time, the fire would be expected to be extinguished by plant operators or the fire brigade before much

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damage occurred to plant safety systems. If rapid fire spread occurred before intervention by plant personnel, the control room could be evacuated and safe plant shutdown achieved using the alternate shutdown capability, which the licensee has affirmed is physically and electronically independent of the control room, and emergency shutdown procedures. Therefore, the absence of a fixed fire suppression system has no safety significance."

During the extended shutdown for Salem Units 1 and 2, changes to the alternate shutdown procedure were initiated. Prior to the latest revision of the alternate shutdown procedures, some operator actions were not addressed in detail in the procedures. These operator actions at the time of the event were controlled and directed by the Operations Superintendent (previously Senior Nuclear Shift Supervisor). The revised procedures include specific steps that each individual needs to perform to achieve safe shutdown of the plants. Some new operator actions have also been added to address the NRC's concern of fire induced spurious operations involving the service water system as documented in PSE&G letter LR-N96125 dated June 19, 1996. As a result of the revision of the alternate shutdown procedures, PSE&G has determined that the commitment to perform simultaneous shutdown of both Salem Units 1 and 2 at minimum Technical Specification levels can not be met. However, PSE&G is controlling the necessary minimum shift staffing levels to perform a simultaneous alternate shutdown of Unit 1 and 2 under administrative procedures.

This change to the commitment in the July 15, 1988, exemption request was evaluated under 10CFR50.59 and the determination was made that an Unreviewed Safety Question (USQ) does not exist. Although the method of control of the minimum staffing level for performing a simultaneous alternate shutdown is being revised, the intent of the original commitment contained in the exemption request, as approved by the NRC has remained unchanged. The simultaneous alternate shutdown capability for Salem Unit 1 and 2 still remains. Changes to the administrative procedures are evaluated under 10CFR50.59 and therefore any subsequent changes to the minimum shift staffing levels at Salem Units 1 and 2 would be revised under 10CFR50.59.

Therefore, PSE&G is revising our commitment contained in the July 15, 1988, to state that the minimum shift staffing levels necessary to perform a simultaneous alternate shutdown of both Salem Units 1 and 2 are controlled under administrative procedures.

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The current Technical Specifications for Salem Units 1 and 2 when both Units are above mode 4 require a total (both Units) minimum shift complement as follows:

- 1 Operations Superintendent (Senior Nuclear Shift Supervisor) (OS)
- 2 Control Room Supervisors (Senior Reactor Operators - SRO) (CRS)
- 1 Shift Technical Advisor (STA) [Note: Individual who fulfills the STA requirements may fill the same position on Unit 1. The STA, if a licensed SRO, may concurrently fill the SRO position on one unit; the other unit also requires a qualified SRO]
- 4 Nuclear Control Operators (NCO's)
- 5 Equipment Operators (EO's)
- 1 Maintenance Electrician

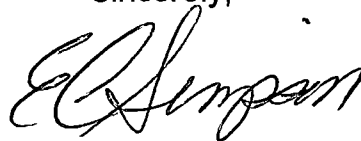
With the revised alternate shutdown procedures, the current staffing that is necessary to perform the simultaneous alternate shutdown is as follows:

- 1 OS
- 2 CRS
- 1 STA
- 5 NCO's
- 6 NEO's
- 2 Technicians

Although PSE&G is revising our commitment in the July 15, 1988 letter as stated above, changes to the Salem Units 1 and 2 Technical Specifications minimum shift crew composition table will be pursued to increase the required staffing levels.

If you have any questions concerning the above information, please do not hesitate to contact us.

Sincerely,



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