



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NOS. 104 AND 81 TO FACILITY OPERATING
LICENSE NOS. DPR-70 AND DPR-75
PUBLIC SERVICE ELECTRIC & GAS COMPANY
PHILADELPHIA ELECTRIC COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY
SALEM GENERATING STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

1.0 INTRODUCTION

By letter dated October 4, 1989, Public Service Electric & Gas Company, the licensee, requested that implementation of Amendments 101 and 78 to license Nos. DPR-70 and DPR-75, respectively, be delayed until prior to startup following the next plant shutdown to Mode 3, Hot Standby. This is necessary because Section 12.4.4.1 (added by amendments 101 and 78) requires all manual isolation valves to be locked open. Prior to restart from the last refueling outages, the valves were verified open but not locked. The valves are physically located behind a biological shield and radiation exposure considerations preclude locking the valves open with the reactor critical. Amendments 101 and 78 were to be implemented within 45 days of the date of issuance, which made October 12, 1989 the deadline for implementation. To avoid an unnecessary shutdown and allow the staff sufficient time to process the changes, a Temporary Waiver of Compliance was issued on October 11, 1989. In addition, the licensee requested exigent handling of this request to avoid shutting down the plants. The staff has agreed to this request.

2.0 EVALUATION AND EXIGENT CIRCUMSTANCES

Amendments 101 and 78, applicable to Salem 1 and 2, respectively, add Technical Specifications for the Reactor Vessel Head Vent (RVHV) System. Surveillance Requirement 12.4.4.1 requires that manual isolation valves be OPERABLE by locking open. Implementation of the Amendments was to be completed by October 12, 1989. Both units are currently at or near 100% power and because the valves are physically located behind a biological shield, personnel radiation exposure considerations prohibit locking the valves at this time. Prior to restart following the last refueling

outages, the valves were used to vent the reactor vessel head and were verified as being open, but not locked. Because of these activities there is a high level of assurance that the RVHV Systems are functional, should it become necessary to use the systems.

The licensee has requested a delay in implementing Amendments 101 and 78 until prior to reactor startup following the next plant shutdown to Mode 3, Hot Standby. The latest this implementation schedule would allow is the next Unit 1 refueling outage, currently scheduled for October 1990, and the next Unit 2 refueling outage, currently scheduled for March 1990.

The NRC staff has reviewed the request and has determined that subjecting the plants to a shutdown/restart cycle to lock open the RVHV valves is not warranted because:

1. The valves were verified open prior to restart from the last refueling outage thereby providing a high level of assurance that the RVHV Systems are functional,
2. The valves are designed to be used for certain accidents, which are low probability events and
3. No credit is taken for the RVHV System in any accident analysis at Salem.

Based on the above, the NRC staff finds the deferred implementation for Amendments 101 and 78 to DPR-70 and DPR-75, respectively, to be acceptable.

The Commission has determined that the licensee has properly invoked the exigency provisions of 10 CFR 50.91(a)(6). Failure of the Commission to act on the licensee's request would result in both Salem units being shut down for the sole purpose of locking open the manual isolation valves. Therefore, the request should be processed under the exigency provisions of 10 CFR 50.91(a)(6)(i)(A).

3.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the amendment would not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated; 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in the margin of safety. The staff has evaluated the proposal against the three factors as part of the determination:

1. Does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Credit has not been taken for the RVHV System in any accident analysis at Salem. Therefore, even if the RVHV System was not operable, there would be no effect on previously analyzed accidents. Delaying the implementation of the technical specifications does not render the RVHV System nonfunctional. Because the vent path was used and the manual valves verified open there is a high degree of assurance that the RVHV System is functional.

2. Does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The RVHV System installed at both Salem Units was previously approved by NRC. System failures were analyzed as part of that review. Delaying implementation of the technical specifications does not create any new or different accidents.

3. Does not involve a significant reduction in the margin of safety.

Credit for having the RVHV System was not taken in any accident analysis at Salem. Therefore, there is no reduction in the margin of safety even if the RVHV System was inoperable. Therefore, delaying implementation of the technical specifications for the RVHV System will not reduce the margin of safety.

Based on the above considerations the staff concludes that the amendments involve no significant hazards consideration.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

4.0 CONCLUSION

The Commission made a proposed determination that the amendments involve no significant hazards consideration which was published in the Federal Register (54 FR 41887) on October 12, 1989 and consulted with the State of New Jersey. No public comments were received and the State of New Jersey did not have any comments.

We have concluded, based on the considerations discussed above, that: (1) because the amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated, do not create the possibility of an accident of a type different from any previously evaluated, and do not involve a significant reduction in a margin of safety, the amendments do not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Dated: November 21, 1989