

SAFETY EVALUATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 3
TO FACILITY OPERATING LICENSE NO. DPR-75
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
SALEM GENERATING STATION, UNIT NO. 2
DOCKET NO: 50-311

By letters dated August 22, 1980, Public Service Electric and Gas Company (the licensee) submitted requests for an amendment to their Facility Operating License DPR-75 for Salem Generating Station, Unit No. 2. The proposed technical Specification changes deal with the requirement to plug Row 1 tubes in the steam generators, changes to the Salem Radiation Protection organization and rewording of the High Radiation Area section.

The first request is for removal of the requirements of Section 8.7 which requires the licensee to plug Row 1 tubes in the steam generators prior to exceeding 5 percent power. The licensee has requested that the decision to plug Row 1 tubes be delayed until the staff has evaluated the Westinghouse program regarding Row 1 tube cracking. The results are expected in late November or early December. Although the potential for non-denting related Row 1 tube cracking does exist, we have concluded that for the reasons given below, operation of the steam generators without Row 1 being plugged will not constitute an undue risk to the health and safety of the public:

1. The Row 1 tube leaks experienced to date at three operating plants have been small and stable.
2. Primary to secondary leakage rate limits, and associated surveillance requirements will be established to provide assurance that the occurrence of tube cracking during operation will be detected and appropriate corrective action, such as tube plugging, will be taken such that any individual crack present will not become unstable under normal operating, transient or accident conditions.

In addition, the licensee has operated Salem, Unit 1 steam generators beyond the first refueling outage without experiencing any leaking of Row 1 tubes. The design of Unit 2 steam generators is identical to that in Unit 1.

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After the results of the Westinghouse/PGE program become available, we will determine if Row 1 tube plugging will be required at a later date.

The licensee has proposed significant changes to the Salem Radiation Protection organization. PSE&G changes provide for the separation of the radiation protection function from the Performance Department and formation of a new Radiation Protection Department. This new department will be headed by a Radiation Protection Engineer who will report directly to the station Manager. It will have a Senior Supervisor - Radiation Protection (who will act as backup to the Radiation Protection Engineer), Technical Supervisors, Technicians and Technical Assistants, all of whom will be devoted to the function of radiation protection. The remainder of the Performance Department will be modified to split the Technical Assistants such that they are devoted to either the instrumentation and controls function or the chemistry function.

These proposed changes meet our positions in the draft "Criteria for Utility Management and Technical Competence" and Regulatory Guide 8.8 as follows:

1. The Radiation Protection Engineer (RPE - equivalent to the Radiation Protection Manager) reports directly to the Station Manager, independent of operational, technical or administrative groups. The RPE is a required member of the Station Operations Review Committee (SORC). Staff qualifications require that the RPE meet or exceed the recommendations of Regulatory Guide 1.8.
2. The newly formed Radiation Protection Department has an independent radiation protection function at all levels, and is separate from such functions as chemistry. A backup to the RPE, the Senior Supervisor-Radiation Protection has been designated. All Technical Supervisors, Technicians and Technical Assistants within the department are devoted to the radiation protection function.
3. A formal program to replace contractor radiation protection personnel with permanently assigned station radiation protection technicians has been implemented. Additionally, a qualification and retraining program conducted in accordance with ANSI 18.1, provides formal qualification and training for the radiation protection department personnel. PSE&G anticipates the reorganization actions and programs to be fully complete by July 1, 1981. In the interim, a permanent staff is being recruited and all contractor radiation protection technicians are receiving classroom and on the job training on systems, radiological fundamentals and procedures.

These actions and commitments by PSE&G for the Salem Station adequately meet the positions of NUREGs-0660/0694, NUREG-DRAFT "Criteria for Utility Management and Technical Competence" and Regulatory Guide 8.8 regarding Radiation Protection Organization and are therefore satisfactory. An evaluation of the Salem Radiation Protection Department will be performed during a routine inspection.

The final request concerns Section 6.12 High Radiation Area. The proposed Technical Specification change for high radiation area control provides adequate controls for avoiding unnecessary exposure by strictly controlling posting and access. Barricades, High Radiation Area posting, Radiation Exposure Permits, dose rate and dose monitoring, and locking where dose rates exceed 1,000 millirem/hr, are utilized in the Standard Tech Spec. format for High Radiation Area control. This change adequately meets the requirements of 10 CFR Part 20.203(c)(2) and the ALARA considerations of Regulatory Guide 8.8 and is acceptable.

Environmental Consideration

We have determined that this action does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination we have further concluded that this action is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR 51.5(d)(4), that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.

Conclusion

We have concluded, based on the consideration discussed above, that: (1) because the action does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the action does 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 will not be inimical to the common defense and security or to the health and safety of the public.

Dated: OCT 10 1980