

Public Service  
Electric and Gas  
Company

Steven E. Miltenberger

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-1100

Vice President and Chief Nuclear Officer

DEC 28 1980  
NLR-N90237

Reference: LCR 90-05

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Gentlemen:

REQUEST FOR AMENDMENT  
FACILITY OPERATING LICENSE NPF-57  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) hereby transmits an application to amend Appendix A of Facility Operating License No. NPF-57 in accordance with 10CFR50.90. This amendment request would revise the Administrative Controls section of the Hope Creek Generating station (HCGS) Technical Specifications.

A description of the requested amendment, supporting information and analyses for the change, and the basis for a no significant hazards consideration determination are provided in Attachment 1. The Technical Specification pages affected by the proposed change are marked-up in Attachment 2.

Upon NRC approval of this proposed change, PSE&G requests that the amendment be made effective on the date of issuance, but implementable within sixty days to provide sufficient time for associated procedural modifications.

Pursuant to the requirements of 10CFR50.91(b)(1), PSE&G has provided a copy of this amendment request to the State of New Jersey.

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

Sincerely,

*S. E. Mittenberger* 12/28/90

Attachments

Affidavit

C Mr. T. T. Martin, Administrator  
USNRC Region I

Mr. S. Dembek  
USNRC Licensing Project Manager

Mr. T. P. Johnson  
USNRC Senior Resident Inspector

Mr. K. Tosch, Chief,  
Bureau of Nuclear Engineering  
New Jersey Department of Environmental Protection

Ref: NLR-N90237

STATE OF NEW JERSEY        )  
                                  )  SS.  
COUNTY OF SALEM            )

S. La Bruna, being duly sworn according to law deposes and says:

I am Vice President - Nuclear Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth in our letter dated     DEC 28 1990     , concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.

*S. La Bruna*

Subscribed and Sworn to before me  
this 28<sup>th</sup> day of December, 1990

*Deloris D Hadden*  
Notary Public of New Jersey

My Commission expires on \_\_\_\_\_  
**DELORES D HADDEN**  
Notary Public of New Jersey  
~~My Commission Expires March 28, 1990~~

Ref: LCR 90-05

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATION CHANGE

PROPOSED CHANGE TO THE TECHNICAL SPECIFICATIONS  
FACILITY OPERATING LICENSE NPF-57  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354

ref: LCR 90-05

DESCRIPTION OF THE CHANGE

As shown on the marked-up Technical Specifications (TS) pages in Attachment 2, PSE&G requests that Administrative Controls, UNIT STAFF, Section 6.2.2 be revised to reflect the current Hope Creek Generating Station (HCGS) operating shift schedules, which average 40 hours per week, but consist of twelve hour shifts. The same limitations on excessive overtime are maintained as in the present TS. Additionally, modify Administrative Controls, TECHNICAL REVIEW AND CONTROL, section 6.5.3.2.c to indicate that Station Qualified Reviewers meet or exceed the qualifications described in Section 4.1 and 4.7 of ANS 3.1, 1981.

REASON FOR THE CHANGE

UNIT STAFF, TS 6.2.2

As part of an extended test, (over one year) the operating personnel at HCGS have worked 12 hour shifts for three or four days per week wherein they average forty hours per week. The proposed change removes existing TS wording that conflicts with this work schedule.

TECHNICAL REVIEW AND CONTROL, TS 6.5.3.2.c

The current TS indicates that Station Qualified Reviewers will meet or exceed the qualifications described in Section 4.4 of ANS 3.1, 1981. This Section does not adequately provide qualification for review personnel in the areas of Operations and Maintenance. The proposed ANS Sections in this change are more appropriate for the review function, in general, and encompass all pertinent disciplines.

## JUSTIFICATION FOR THE CHANGE

### UNIT STAFF, TS 6.2.2

The current 12 hour shift schedule, which has been in place for two years as part of a trial, has enjoyed a high degree of acceptance among shift personnel, both workers and supervision alike. During the trial period, shift workers have demonstrated higher morale, a high degree of alertness, high productivity, and lower incidence of absence due to illness. On the 12 hour shift schedule, personnel receive more consecutive time off and remain on the same shift for blocks of time as opposed to rotating to different hours each work week; these conditions are considered as contributors to a healthier work force and improved productivity in EPRI NP-6748, "Control Room Operator Alertness and Performance in Nuclear Power Plants", dated February, 1990.

### TECHNICAL REVIEW AND CONTROL, TS 6.5.3.2.c

Section 4.4 of ANS 3.1, 1981 contains qualifications for professional-technical group leaders, while Section 4.7 pertains directly to review personnel and is the more appropriate standard for delineating the qualifications of Station Qualified Reviewers.

## 10CFR50.92 SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

PSE&G has, pursuant to 10CFR50.92, reviewed the proposed amendment to determine whether our request involves a significant hazards consideration. We have determined that:

The operation of Hope Creek Generating Station (HCGS) in accordance with the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment does not involve a physical or procedural change to any structure, component or system that significantly affects the probability or consequences of any accident or malfunction of equipment important to safety previously evaluated in the Updated Final Safety Analysis Report (UFSAR). The proposed changes will 1) permit the use of 12 hour shifts which average 40 hours per week and in all other aspects, satisfy the current hours-of-work guidelines in TS 6.2.2 for operating shifts and 2) change the TS 6.5.3.2.c-specified ANS 3.1, 1981 section which delineates the qualifications of the Station Qualified Reviewer position to the appropriate ANS 3.1, 1981 Section.

These changes are administrative in nature and have no significant impact on the probabilities or consequences of any evaluated accident or malfunction of safety important equipment.

The operation of Hope Creek Generating Station (HCGS) in accordance with the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

There are no physical changes to the plant or to the manner in which plant systems are operated involved in the proposed revision. The change modifies the working hours per shift for operating personnel without significantly changing the hours worked per week from the current TS requirements and retains the current limitations on excessive overtime. This change and the shift to the appropriate ANS Section for Station Qualified Reviewer qualifications are administrative in nature; therefore, no new or different accident is created.

The operation of Hope Creek Generating Station (HCGS) in accordance with the proposed change does not involve a significant reduction in a margin of safety.

The Administrative Controls TS sections for which these revisions are proposed have no Bases described in the Technical Specifications. Plant operation with the proposed revision to shift working hours has been found to improve operator morale and performance. Citing of the more appropriate ANS 3.1 qualifications standard for Station Qualified Reviewers will more adequately ensure that all personnel performing review functions are properly qualified. Therefore, these proposed administrative changes will, if anything, enhance plant safety by their adoption.

Conclusion:

Based upon the above, we have determined that this proposed change does not involve a Significant Hazards Consideration.