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 1990 NLR-N90223 Reference: LCR 90-07 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 Facility Operating License No. NPF-57 in accordance with 10CFR50.90. This amendment request would remove an existing License Condition which has been satisfied and replace it with a new requirement. 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 License page affected by the proposed change is 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 completion of associated administrative activities 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. 9101080305 901228 PDR ADOCK 05000354 UUUUUU

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

Sincerely,

A. K. Millenberger 100

Attachments Affidavit

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-N90223

STATE OF NEW JERSEY)
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.

JB Bun

Subscribed and Sworn to before me

this 28th day of December 1990

Notary Public of New Jersey

DELORIS D HADDEN Notary Public of New Jersey My Commission Expires March 29, 1995

My Commission expires on

Ref: LCR 90-07

ATTACHMENT 1

PROPOSED LICENSE CONDITION CHANGE

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

ref: LCR 90-07

DESCRIPTION OF THE CHANGE

As shown on the marked-up page in Attachment 2, PSE&G requests that the Hope Creek Generating Station (HCGS) Facility Operating License be modified by replacing existing License Condition 2.C.(5), Solid State Logic Modules with a new requirement for the modules as follows:

"(5) Solid State Logic Modules

PSE&G shall continue, for the life of the plant, a reliability program to monitor the performance of the Bailey 862 SSLMs installed at Hope Creek Generating Station. This program should obtain reliability data, failure characteristics, and root cause of failure of both safety-related and non-safety-related Bailey 862 SSLMs. The results of the reliability program shall be maintained on-site and made available to the NRC upon request."

REASON FOR THE CHANGE

In a letter dated November 15, 1990, the NRC concluded that reliability information provided by PSE&G in several submittals pertaining to the Bailey Solid State Logic Modules (SSLMs) in use at the Hope Creek Generating Station is acceptable and has satisfied existing License Condition 2.C.(5).

As stated in PSE&G's September 10, 1990 letter, the SSLM reliability program developed by PSE&G will monitor the performance of the SSLMs for the life of the plant. However, the NRC staff feels that the SSLM reliability program is important enough to warrant continuing the program as a license condition and has recommended that PSE&G propose a license amendment to paragraph 2.C.(5). Since PSE&G agrees as to the importance of monitoring SSLM reliability, the NRC recommendation is submitted herein.

JUSTIFICATION FOR THE CHANGE

Since the NRC staff has concluded that the original License Condition 2.C.(5) has been satisfied, it should be removed. However, as PSE&C and the NRC staff agree, the Bailey 862 SSLM reliability program is sufficiently important to warrant a license condition that ensures the program's continuation for the life of the Hope Creek plant. Therefore, a new license condition, as stated above, is appropriate.

PSE&G's current Bailey 862 SSLM reliability program, and the information from it, were found by the NRC to be acceptable and to satisfy the original license condition, as stated in their November 15, 1990 letter. This existing program will be continued for the life of the plant. In the interest of clarity, the PSE&G interpretation of the license condition program is as follows: reliability data will consist of logging and trending SSLM failures discovered on installed SSLMs; failure characteristics will consist of determination and documentation of failure effects on equipment performance of design functions with emphasis on safety functions; root cause of failure will consist of determination of SSLM failure mode within the capabilities of plant test equipment and investigation of causes for any adverse trends in SSLM failure rates.

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 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 simply add a condition to the license that continues a monitoring program for the life of the plant.

This change is administrative in nature and has 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 mandates that an existing monitoring program continue. This change is 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 continuation of a reliability monitoring program for the life of the plant, therefore, this proposed administrative change, will enhance plant safety by its' adoption. There would be no negative impact on any safety margin.

Conclusion:

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