

Public Service
Electric and Gas
Company

Joseph J. Hagan

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 809-339-1200

Vice President - Nuclear Operations

APR 25 1994

NLR-N94076

Reference: LCR 93-24

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

Gentlemen:

REQUEST FOR AMENDMENT AND
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
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 for the Hope Creek Generating Station (HCGS) in accordance with 10CFR50.90. This request would revise Technical Specifications Section 3.8.1.1, A.C. Sources - Operating, Section 3.8.1.2, A.C. Sources - Shutdown, and their associated BASES Section 3/4.8.1.

A description of the requested changes, supporting information and analyses for the changes, 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.

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.

Upon NRC approval of this proposed change, PSE&G requests that the amendment be made effective on the date of issuance, but implementable within 60 days to provide sufficient time for associated administrative activities.

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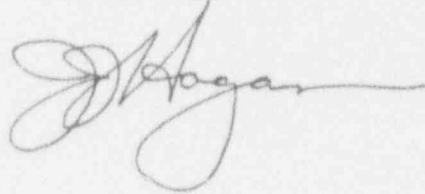
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Should you have any questions regarding this request, we will be pleased to discuss them with you.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Hogan", with a long horizontal flourish extending to the right.

Attachments
Affidavit

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

Mr. J. Stone
USNRC Senior Licensing Project Manager

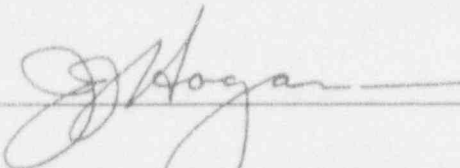
Mr. C. Marschall
USNRC Senior Resident Inspector

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

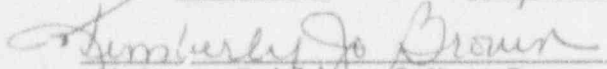
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

Joseph J. Hagan, 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, referenced above, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 25th day of April, 1994



Notary Public of New Jersey

My Commission expires on _____
KIMBERLY JO BROWN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires April 21, 1998

Ref: LCR 93-04

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATIONS CHANGE

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

Ref: LCR 93-24

I. DESCRIPTION OF THE CHANGE

As shown on the marked-up Technical Specifications (TS) pages in Attachment 2, PSE&G requests that for:

- ♦ TS 3.8.1.1.b.1 - the minimum level for each fuel oil day tank be increased to 360 gallons of fuel,
- ♦ TS 3.8.1.2.b.1 - the minimum level for each fuel oil day tank be increased to 360 gallons of fuel,
- ♦ TS BASES B3/4.8, Electrical Power Systems - a reference to Amendment 59 to the HOGS Facility Operating License (FOL), which authorized a change to the surveillance requirements for demonstrating emergency diesel generator OPERABILITY be added.

II. REASON FOR THE CHANGE

These changes will make the above Technical Specifications agree with an NRC approved change (Amendment 59) to the Hope Creek FOL. The current requirement in the TS for minimum level in the Emergency Diesel Generator (EDG) Fuel Oil Day Tank is 200 gallons. This value is incorrect and non-conservative for supporting the NRC-approved EDG run time of 55-60 minutes. The correct value for the day tank levels is 360 gallons.

III. JUSTIFICATION FOR THE CHANGE

Prior to issuance of Amendment 59, the Hope Creek UFSAR indicated that the EDG fuel oil storage system is sized in accordance with the requirements of Regulatory Guide 1.137, Revision 1, which, in turn, refers to American National Standards Institute (ANSI) Standard N195-1976. This standard requires the Emergency Diesel Generator (EDG) Fuel Oil Day Tank capacity to provide a 60 minute EDG run time at 100% loading, and with a 10% margin in capacity, at the level where fuel oil is automatically added to the day tank.

During NRC Inspection 50-354/92-80, it was determined that the Hope Creek fuel oil storage system capacity and fuel oil makeup setpoints did not support the above UFSAR commitment and the TS EDG fuel oil day tank level requirement was unconservative at 200 gallons minimum. Subsequent PSE&G submittals, requesting and justifying a relaxation from the 60 minute day tank capacity, resulted in Amendment 59 to the FOL authorizing a 55 minute EDG run time day tank capacity. The 55 minute run time, with all appropriate conservatism added, corresponds to an EDG day tank level of 358 gallons. Since the tank level is indicated in 20 gallon increments, 360 gallons was selected as the minimum allowable fuel oil level in each day tank. Fuel oil makeup transfer pump setpoints have been adjusted to maintain the new minimum day tank levels equal to or greater than 360 gallons. The TS need to be revised to specify 360 gallons minimum in each day tank.

IV. 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:

1. The operation of the 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 to the Technical Specifications will bring the minimum allowable EDG fuel oil day tank levels into agreement with the levels corresponding to EDG run times reviewed and approved by the NRC in Amendment 59 to the Hope Creek Generating Station Facility Operating License. Increasing the minimum level requirement is conservative and when compared to the current level requirement, will act to reduce the consequences of any accident or malfunction of equipment important to safety previously evaluated in the Updated Final Safety Analysis Report (UFSAR). The proposed change will have no impact on the probability of any accident.

2. The operation of the 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.

The physical changes to the plant and to the manner in which the plant is operated in the proposed revisions add conservatism to the current requirements in the Technical Specification. No new or different kind of accident is created by the proposed change.

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

The proposed revision, by maintaining a higher (more conservative) Emergency Diesel Generator Day Tank level, will result in an increase in margins of safety.

Conclusion:

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