

Public Service
Electric and Gas
Company

Stanley LaBruna

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Vice President - Nuclear Operations

APR 01 1991

NLR-N90235

Reference: LCR 90-08

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 certain emergency diesel generator surveillance testing in the Hope Creek Generating station (HCGS) Technical Specifications in accordance with the provisions of NRC Generic Letter 84-15.

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.

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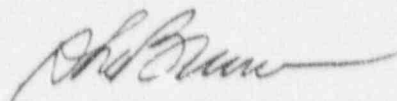
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Pursuant to the requirements of 10CFR50.91(b)(1), PSE&G has provided a copy of this amendment request to the State of New Jersey.

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

Sincerely,



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

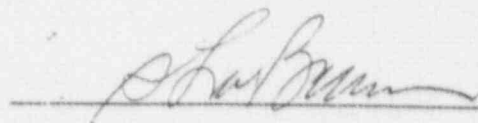
Mr. K. Tosch, Chief,
Bureau of Nuclear Engineering
New Jersey Department of Environmental Protection

REF: NLR-N90235

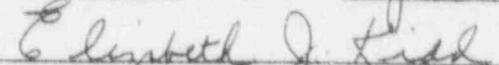
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

Stanley LaBruna, 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 _____, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 1st day of April, 1991



Notary Public of New Jersey

My Commission expires on 4/25/95

ELIZABETH J. KIDD
Notary Public of New Jersey
My Commission Expires April 25, 1995

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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 90-08

DESCRIPTION OF THE CHANGE

As shown on the marked-up Technical Specifications (TS) pages in Attachment 2, PSE&G requests that TS Surveillance 4.8.1.1.2.h.8, A.C. Sources - Operating, be revised by removing the following requirement:

"Within 5 minutes after completing this 24 hour test, perform Surveillance Requirement 4.8.1.1.2.h.4.b).**" and its associated "***" footnote.

Additionally, Surveillance Requirement 4.8.1.1.2.h.4.b would be modified by revising its "*" footnote to read:

"*This diesel generator start (10 sec) and subsequent loading (130 sec) shall be preceded by an engine prelube period and operation at rated load for one hour, or until operating temperatures have stabilized."

REASON FOR THE CHANGE

The proposed changes will provide testing flexibility while ensuring that mechanical stress and wear on the diesels are minimized. The current testing requirements incorporate a level of redundancy that provides no meaningful additional test information while increasing the mechanical stress and wear imposed on the Emergency Diesel Generators.

JUSTIFICATION FOR THE CHANGE

The proposed change involves testing of the Emergency Diesel Generator (EDG) start and loading capabilities from ambient and from normal operating temperatures. Requiring that the EDG has been run and loaded for at least 1 hour and/or that operating temperatures have stabilized prior to performing the TS 4.8.1.1.2.h.4, Loss Of Offsite Power test, will ensure that the surveillance test is conducted at nominal operating temperatures. Removing the requirement that the test be initiated within 5 minutes of completing the 24 hour test run does not have any adverse impact on probabilities of equipment malfunction or of any accident.

The current TS 4.8.1.1.2.h.6 demonstrates the EDG's ability to start and load from ambient conditions on loss-of-power in conjunction with an ECCS actuation signal. Initiating the loss-of-offsite-power-only test prescribed in TS 4.8.1.1.2.h.4 from normal operating temperature demonstrates loss-of-power detection, emergency bus deenergization and load shedding, diesel start with permanently connected loads and auto-sequencing of shutdown loads, regardless of the EDG's starting temperatures. Therefore, the redundant performance of this test from ambient conditions (in the current TS 4.8.1.1.2.h.4) and then again from normal operating temperatures at the end of the current TS 4.8.1.1.2.h.8 is an additional cycling of the EDG's (with its attendant mechanical stress and wear) that provides no meaningful additional test information.

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 or malfunction of equipment important to safety previously evaluated.

The proposed amendment does not involve a physical or procedural change to any structure, component or system that significantly affects accident/malfunction probabilities or consequences previously evaluated in the Updated Final Safety Analysis Report (UFSAR). The proposed change involves the testing of the Emergency Diesel Generator (EDG) start and loading capabilities at normal operating temperatures. By requiring that the EDG has been run and loaded for at least 1 hour and/or that operating temperatures have stabilized prior to performing the start and load test, we ensure that the surveillance test is conducted at nominal operating temperatures. Removing the requirement that the test be initiated within 5 minutes of completing the 24 hour test run does not adversely impact the probability of equipment malfunction or that of any accident. TS 4.8.1.1.2.h.6 demonstrates the EDG's ability to start from ambient conditions on loss-of-power in conjunction with an ECCS actuation signal. Initiating the loss-of-offsite-power prescribed in TS 4.8.1.1.2.h.4 from normal operating temperature demonstrates loss-of-power detection, emergency bus deenergization and load shedding, diesel start with permanently connected loads, auto-sequencing of shutdown loads, etc., regardless of the EDG's starting temperatures. Therefore, performing this test from ambient conditions (in the current TS 4.8.1.1.2.h.4) and then again from normal operating temperatures at the end of the current TS 4.8.1.1.2.h.8 is an additional cycling of the EDG's (with its attendant mechanical stress and wear) that provides no meaningful test information.

The proposed revision will provide operational testing flexibility and reduce mechanical stress and wear while ensuring the same level of emergency diesel generator performance.

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.

The proposed change involves testing requirements for the EDGs, wherein there is no change to the actual capabilities tested. There is no change in any plant equipment or method of operating that can create any accident.

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 proposed revisions will, by eliminating one additional start and load cycle on the EDGs, reduce mechanical stresses and wear on that equipment; thereby, enhancing their reliability. This revision will not eliminate the testing of any currently tested operating function and will have no negative impact on any margin of safety.

Conclusion:

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

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ATTACHMENT 2

INSERTS AND MARKED-UP PAGES