



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 52 TO FACILITY OPERATING LICENSE NO. NPF-57

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

1.0 INTRODUCTION

By letter dated January 24, 1990 and supplemented on April 27, 1990, December 4, 1990, September 10, 1991 and December 10, 1991, Public Service Electric & Gas Company (PSE&G) requested an amendment to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. The supplemental letters did not affect the original no significant hazards determination. The proposed amendment would revise the Radiation Protection and Radiological Environmental Monitoring Technical Specifications and make various organizational changes.

2.0 EVALUATION

The changes proposed in this amendment may be categorized and justified as follows:

- a. Changes related to PSE&G's organizational configuration, which reflect titular changes, and changes in management responsibility are administrative in nature and do not adversely impact management attentiveness to safe operation of the Hope Creek Generating Station. The recent reorganization of PSE&G's Nuclear Department is intended to increase overall management effectiveness, in some cases by consolidating oversight of related activities. For example, quality assurance and nuclear safety review and audit activities will both be under the direction of one general manager. The Manager - Nuclear Safety will assume management responsibility of the Onsite Safety Review staff, thereby allowing the Onsite Safety Review Engineer to dedicate his efforts to review activities.

This category includes the proposed change to require SORC review for procedure changes and changes to Security Plan, Emergency Plan and Fire Protection Program Plan only if a 10 CFR 50.59 safety evaluation is involved. This approach will consolidate the screening and review process for procedure changes by doing away with the significant safety issue determination currently in use at the Hope Creek Generating Station. Screening for safety significance will be performed by determining 10 CFR 50.50 applicability (10 CFR 50.54(p) for Security Plan changes and 10 CFR 50.54(q) for Emergency Plan changes), which is consistent with NRC regulations regarding procedure changes (10 CFR 50.59 and 10 CFR 50.54), and is acceptable.

- b. PSE&G's current practice of preparing and submitting the Annual Radiological Environmental Operating Report includes the two sampling location maps explicitly described by the proposed change. This amendment clarifies the current practice, which is acceptable to the NRC, in order to remove any ambiguity from the Technical Specifications, and is acceptable.
- c. Changes to reporting levels of radioactivity concentrations and lower limits of detection (LLD) for the radiological environmental monitoring program are consistent with NUREG-0473, "Standard Radiological Effluent Technical Specifications for Boiling Water Reactors," Revision 3, draft. These changes propose allowing a higher level of I-131 if a drinking water pathway is not potentially affected by the effluent being monitored. The provisions of 40 CFR 141 will still be complied with where applicable. 10 CFR 20.106 requires that effluents released to unrestricted areas are maintained within the limits of Appendix B, Table II of 10 CFR Part 20. Table II specifies a limit of 300 pCi/l for soluble I-131 and 60,000 pCi/l for the insoluble form. Using 300 pCi/l for comparison purposes, the proposed reporting level and LLD for I-131 are respectively 6.7% and 3.3% of the Table II limits.

Therefore, the proposed changes will not affect compliance with 10 CFR 20.106 and will not allow for an increase in radiation dose to any member of the public, and is acceptable.

- d. Changes to the description of Nuclear Safety Review (NSR) responsibilities include consolidating the management of the Offsite and Onsite Safety Review Groups and revising the description of NSR activities to increase specificity and eliminate redundancy, and is acceptable.

Changes in this category will not lessen the scope of NSR activities and will increase the effectiveness of the Onsite Safety Review Group by allowing the Onsite Safety Review Engineer to dedicate his time to review activities, since the Manager - Nuclear Safety will have management responsibility. None of the changes in this category will reduce the effectiveness of NSR review and audit functions, and they are acceptable.

- e. Changes deleting references to outdated requirements or documents are justified on the basis that they are largely editorial and provide clarification without reducing any commitments, and are acceptable.

### 3.0 SUPPLEMENTAL CORRESPONDENCE

The original amendment request dated January 24, 1990 proposed incorporating the provisions of 10 CFR 20.203(c)(4), which allows a high radiation area established for a period of 30 days or less to be controlled using direct surveillance, into Technical Specification 6.12.1. During discussions between the staff and the licensee on March 13, 1990, it was determined that the existing Technical Specifications do not conflict with 10 CFR 20.203(c)(4). Therefore, the amendment request was modified in supplemental correspondence dated April 27, 1990 to delete the changes that had been requested to paragraph 6.12.1.

In addition, the original amendment request dated January 24, 1990 proposed changes to the distribution requirements for SORC meeting minutes per Technical Specification 6.5.1.9. "Vice President - Nuclear Operations" was added to the required distribution in lieu of the "Vice President and Chief Nuclear Officer." The original amendment request was modified in supplemental correspondence dated December 4, 1990 which withdrew the aforementioned proposed change and requested that the Vice President and Chief Nuclear Officer remain on the required distribution for SORC meeting minutes. This request is consistent with the Administrative Control Technical Specifications proposed for the Salem Generating Station.

The September 10, 1991, supplemental correspondence modified the SORC membership and quorum requirements and revised the description of the administrative procedures requiring SORC review. The changes to SORC composition requirements will allow one Technical Engineer and one Maintenance Engineer to serve as SORC member at any given time. In order to assure continuity among SORC meetings, membership in such positions will be controlled by administrative procedure. In its December 10, 1991, letter PSE&G made a commitment to have the designated member serve for a minimum period of 90 days. The PSE&G proposal would not change the requirement that a minimum quorum consists of the Chairman plus four members including alternates. Therefore, at least 50% of the SORC members must be present in order to have a quorum. Based on the staff's review of PSE&G's submittals, the staff finds that PSE&G's proposal would adequately maintain the SORC's ability to continue its function to advise the General Manager - Hope Creek Operations on all matters related to nuclear safety. Therefore, PSE&G's proposal is acceptable.

Finally, the September 10, 1991, supplemental correspondence revised TS 6.5.1.6a to more accurately describe the administrative procedures requiring SORC review. The proposed change would specify that upper tier administrative procedures and changes that are within the scope of Regulatory Guide 1.33, Revision 2 (February 1978) (RG 1.33), require SORC review. PSE&G's proposal limits the scope of the Station Administrative Procedures and changes thereto that would require SORC review. Based on the staff's review of RG 1.33 and the Hope Creek TS, the staff finds that the licensee's proposal would continue to provide for review of all administrative procedures related to nuclear safety and is, therefore, acceptable.

The supplemental correspondence dated April 27, 1990, December 4, 1990, September 10, 1991 and December 10, 1991 did not change the staff's original no significant hazards determination.

#### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure.

The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (55 FR 6116). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

The amendment also involves changes in recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendment also meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: C. Y. Shiraki  
T. Essig  
S. Dembek

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