

Public Service
Electric and Gas
Company

Stanley LaBruna

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Vice President - Nuclear Operations

MAY 19 1992

NLR-N92068

LCR 92-02

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

LICENSE AMENDMENT APPLICATION
EXCEPTIONS TO SPECIFICATION 4.0.4 FOR SRMS AND IRMS
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) hereby submits a request for amendment of Facility Operating License NPF-57 for the Hope Creek Generating Station in accordance with 10 CFR 50.90. A copy of this submittal has been sent to the State of New Jersey as indicated below pursuant to the requirements of 10 CFR 50.91(b)(1).

This license change request proposes to allow an exception to Specification 4.0.4 for the IRMs and SRMs when operational condition 2 or 3 is entered from operational condition 1. Additionally, two administrative changes are proposed.

Attachment 1 includes a description, justification and significant hazards analysis for the proposed change. Attachment 2 contains marked up Technical Specification (TS) pages which reflect the proposed change.

Upon NRC approval, please issue a License Amendment which will be effective upon issuance and shall be implemented within 60 days of issuance.

Should you have any questions or comments on this submittal, please do not hesitate to contact us.

Sincerely,



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ADD

Affidavit
Attachments (2)

C Mr. S. Dembek
USNRC Licensing Project Manager - Hope Creek

Mr. T. Johnson
USNRC Senior Resident Inspector

Mr. T. T. Martin
Administrator - USNRC Region I

Mr. Kent Tosch
Chief - New Jersey Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
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Trenton, NJ 08625

Ref: NLR-N92068
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STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

S. 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 on our letter dated MAY 19 1992, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.

S. LaBruna

Subscribed and Sworn to before me
this 19th day of May, 1992

Sherry L. Cagle
Notary Public of New Jersey SHERRY L. CAGLE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 5, 1997

My Commission expires on _____

ATTACHMENT 1

REQUEST FOR LICENSE AMENDMENT
EXCEPTIONS TO SPECIFICATION 4.0.4 FOR SRMS AND IRMS
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

I. Description of the Proposed Changes

1. Revise Specification 3.3.1, "Reactor Protection System Instrumentation", to provide an exception to the provisions of Specification 4.0.4 for entry into operational condition 2 or 3 from operational condition 1 for the Intermediate Range Monitors (IRMs).
2. Revise Specification 3.3.6, "Control Rod Block Instrumentation", to provide an exception to the provisions of Specification 4.0.4 for entry into operational condition 2 from operational condition 1 for the SRMs (Source Range Monitors) and IRMs.
3. Revise Specification 3.3.7.6, "Source Range Monitors", to provide an exception to the provisions of Specification 4.0.4 for entry into operational condition 2 or 3 from operational condition 1 for the SRMs.
4. Administratively revise Table 1.2, "Operational Conditions", to permit the reactor mode switch to be placed in the Refueling position, while in Hot or Cold Shutdown, to test the switch interlock functions and related instrumentation. Currently, only the Run and Startup/Hot Standby switch positions are specified for this purpose.
5. Revise Specification 3.4.1.2, "Jet Pumps", to correct a typographical error in Surveillance Requirement 4.4.1.2.b.3 by changing "difference-to-lower plenum differential pressure" to "diffuser-to-lower plenum differential pressure".

II. Reason for the Proposed Changes

The interlocks associated with the SRMs and IRMs are bypassed when the reactor mode switch is in the Run position. Therefore, unless the instrumentation is temporarily modified by inserting jumpers or lifting leads, the mode switch must be out of the Run position in order to functionally test the subject instrumentation in accordance with the applicable surveillance requirements. This can only be accomplished after entering the operational conditions in which the surveillance requirements apply.

Consequently, in order to conduct a routine plant shutdown, either the subject instrumentation must be temporarily modified or the associated action statements must be invoked.

Temporary modifications of the subject instrumentation, such as lifting leads and/or installing jumpers, permits the instrumentation to be tested while the mode switch is in the Run position. However, this also increases the likelihood of failure and/or inadvertent actuation and is therefore considered to be impractical and not warranted to assure plant safety.

The action statements associated with the rod block and Reactor Protection System (RPS) instrumentation require the insertion of a rod withdrawal block, which could potentially and unnecessarily complicate plant operation and the insertion of a half scram which increases the probability of unwarranted transients.

The action statements associated with the SRM specification do not address the condition in which more than two SRMs are inoperable. Therefore, if the required functional testing cannot be completed during a routine plant shutdown prior to the point at which reactor power decreases below range 2 of the IRMs, the provisions of Specification 3.0.3 must be invoked. Although plant shutdown could continue, it is not prudent to intentionally enter Specification 3.0.3 to conduct routine plant evolutions. Additionally, this also could potentially and unnecessarily complicate plant operation.

Based on the preceding discussion, the proposed change is being requested to permit an exception to the requirements of Specification 4.0.4 such that the required surveillance testing of the SRMs and IRMs can be performed after the plant is placed into Operational Condition 2 or 3 from Operational Condition 1. This would permit the performance of routine plant shutdowns without requiring temporary modifications of the subject instrumentation or invoking the requirements of the associated action statements.

III. Justification for the Proposed Changes

Hope Creek License Amendment No. 19 incorporated the recommendations of Generic Letter 87-09 pertaining to the applicability of limiting conditions for operation and surveillance requirements of Technical Specification Sections 3.0 and 4.0. The Generic Letter states, in part:

"A second conflict could arise because, when Surveillance Requirements can only be completed after entry into a mode or specified condition for which the Surveillance Requirements apply, an exception to the requirements of Specification 4.0.4 is allowed."

Insofar as the circuitry of the SRMs and IRMs precludes functional testing in Operational Condition 1 because all rod block and scram functions are bypassed when the mode switch is in Run, the surveillance requirements for these instruments can only be completed after entry into Operational Condition 2 during normal reactor shutdown, or Operational Condition 3 following a reactor scram. Therefore, an exception to the provisions of Specification 4.0.4, as proposed in this submittal, is consistent with the preceding excerpt from Generic Letter 87-09. The proposed exception would only apply during the performance of a plant shutdown (ie. entry into Operational Condition 2 or 3 from Operational Condition 1).

The Generic Letter goes on to state:

"However, upon entry into this mode or condition, the requirements of Specification 4.0.3 may not be met because the Surveillance Requirements may not have been performed within the allowed surveillance interval. Therefore, to avoid any conflict between Specifications 4.0.3 and 4.0.4, the staff wants to make clear: (a) that it is not the intent of Specification 4.0.3 that the Action Requirements preclude the performance of surveillances allowed under any exception to Specification 4.0.4; and (b) that the delay of up to 24 hours in Specification 4.0.3 for the applicability of Action Requirements now provides an appropriate time limit for the completion of those Surveillance Requirements that become applicable as a consequence of allowance of any exception to Specification 4.0.4."

By permitting an exception to the provisions of Specification 4.0.4 during plant shutdown, the plant may be placed into Operational Condition 2 or 3 prior to performance of the surveillance requirements for the SRMs and IRMs without the invocation of the associated action statements which include the insertion of rod blocks and half scrams. Once the plant is placed into Operational Condition 2 or 3, the 24 hour time allowance of Specification 4.0.3 would apply as discussed in the preceding excerpt from Generic Letter 87-09. During this time period, the surveillance requirements are required to be completed.

Lastly, the proposed revisions include two administrative changes.

The first pertains to the definition of each of the operational conditions as specified in Table 1.2. This table currently contains a provision, in the form of a note, which permits the reactor mode switch to be placed in the Run or Startup/Hot Standby position while in operational condition 3, 4, or 5 to test the switch interlock functions and related instrumentation.

The note further specifies that while the mode switch is in either of these positions, the control rods must be verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.

A preferred method of performing this testing while in hot or cold shutdown is to place the mode switch in Refueling. By enabling the one-rod-out interlock, this switch position automatically provides an additional margin of safety beyond the required administrative controls in preventing the occurrence of inadvertent rod withdrawal events.

The proposed change would modify the note to permit the mode switch to be placed in the Refueling position while retaining the option of placing it in the Run or Startup/Hot Standby positions. This will provide the operational flexibility to accommodate potential situations which specifically require the mode switch to be in Run or Startup/Hot Standby while in operational condition 3 or 4.

Lastly, a correction of a typographical error in Surveillance Requirement 4.4.1.2.b.3 is proposed. The correct nomenclature of the non-calibrated jet pump instrumentation is "diffuser-to-lower plenum differential pressure".

IV. Significant Hazards Consideration Evaluation

PSE&G has, pursuant to 10 CFR 50.92, reviewed the proposed amendment to determine whether our request involves a significant hazards consideration. We have determined that operation of the Hope Creek Generating Station in accordance with the proposed changes:

1. Will not involve a significant increase in the probability or consequences of an accident previously evaluated.

During performance of plant shutdowns, operability of the subject instrumentation will be confirmed in a timely manner by surveillance testing in accordance with the time requirements of Specification 4.0.3.

Furthermore, the proposed change would permit the performance of routine plant shutdowns without the invocation of the action requirements associated with the SRM and IRM specifications which include the insertion of rob blocks and half scrams and potential voluntary entry into Specification 3.0.3. This would consequently decrease the probability of unwarranted transients.

The proposed change to permit the reactor mode switch to be placed in the Refueling position while in operational condition 3 or 4 to conduct testing provides the operational flexibility to operate the plant in a more conservative manner than presently required by the subject specification.

2. Will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Neither the operation nor the function of the SRMs, IRMs, reactor mode switch interlocks, or instrumentation associated with the reactor mode switch will be modified by the proposed change. Performance of confirmatory, routine surveillance testing will not create the possibility of a new or different event.

3. Will not involve a significant reduction in a margin of safety.

The proposed changes would permit the performance of routine plant shutdowns without requiring either: 1) the temporary modification of the subject instrumentation which would increase the likelihood of failure or inadvertent actuation, or 2) the invocation of the associated action statements which could increase the probability of unwarranted transients and could unnecessarily complicate plant operation.

The proposed change to permit the reactor mode switch to be placed in the Refueling position while in operational condition 3 or 4 to conduct testing provides an additional margin of safety in that the subject testing can be performed while the one-rod-out interlock is enabled.

V. Conclusion

Based on the preceding discussion, PSE&G has concluded that the proposed change to the Technical Specifications does not involve a significant hazards consideration insofar as the change: (i) does not involve a significant increase in the probability or consequences of an accident previously evaluated, (ii) does not create the possibility of a new or different kind of accident from any accident previously evaluated, and (iii) does not involve a significant reduction in a margin of safety.