



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NOS. 189 AND 172 TO FACILITY OPERATING  
LICENSE NOS. DPR-70 AND DPR-75  
PUBLIC SERVICE ELECTRIC & GAS COMPANY  
PHILADELPHIA ELECTRIC COMPANY  
DELMARVA POWER AND LIGHT COMPANY  
ATLANTIC CITY ELECTRIC COMPANY  
SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-272 AND 50-311

1.0 INTRODUCTION

By letter dated September 25, 1996, the Public Service Electric & Gas Company (the licensee) submitted a request for changes to the Salem Nuclear Generating Station, Unit Nos. 1 and 2, Technical Specifications (TSs). The requested changes would relocate the list of containment isolation valves from TS Table 3.6-1 to the Salem Updated Final Safety Analysis Report (UFSAR). In addition, reference to the table in TS 1.7, 3/4.6.1 and 3/4.6.3 are being updated to reflect the relocation. The requested changes are in accordance with the guidance contained in Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications," dated May 6, 1991.

2.0 EVALUATION

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state technical specifications (TS) to be included as part of the license. The Commission's regulatory requirements related to the content of technical specifications are set forth in 10 CFR 50.36. That regulation requires that the TS include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TS.

The Commission has provided guidance for the contents of TS in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993). In particular, the Commission indicated that certain items could be relocated from the TS to licensee-controlled documents.

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The Commission amended 10 CFR § 50.36 to set forth four criteria to be used in determining whether a particular matter is required to be included in the TS, as follows: (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. As a result, existing TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

The staff's review of the proposed change determined that the relocation of the list of containment isolation valves (Table 3.6-1) does not eliminate the requirements for the licensee to ensure that the containment isolation valves are capable of performing their safety function. Although this list is relocated from the TSs to the UFSAR, the licensee must continue to evaluate any changes to it in accordance with 10 CFR 50.59. Should the licensee's determination conclude that an unreviewed safety question is involved, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, or (3) a reduction in the margin of safety, NRC approval and a license amendment would be required prior to implementation of the change. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to updated final safety analysis report commitments and to take any remedial action that may be appropriate.

The staff's review concluded that 10 CFR 50.36 does not require the list of containment isolation valves to be retained in the TSs. Requirements related to the operability, applicability, and surveillance requirements, including performance of testing to ensure operability of the containment isolation valves, are retained due to these components' importance in mitigating the consequences of an accident. However, the staff determined that the inclusion of the list of containment valves is an operational detail related to the licensee's safety analyses which are adequately controlled by the requirements of 10 CFR 50.59.

Therefore, the continued processing of license amendments related to revisions of the affected TS Table 3.6-1, where the revisions to those requirements do not involve an unreviewed safety question under 10 CFR 50.59, would afford no significant benefit with regard to protecting the public health and safety.

Other related changes to TS 1.7, 3/4.6.1 and 3/4.6.3 are considered administrative in nature. TS 1.7.1.b for Unit 2 referred to Specification 3.6.3.1. However, this should be 3.6.3 since there is no 3.6.3.1. This typographical error is being corrected with the issuance of this amendment.

The staff has concluded, therefore, that relocation of the list of containment isolation valves is acceptable because (1) their inclusion in TSs is not specifically required by 10 CFR 50.36 or other regulations; (2) Table 3.6-1 will be adequately controlled by 10 CFR 50.59, and their inclusion in the TSs is not required to avert an immediate threat to the public health and safety; and (3) changes that are deemed to involve an unreviewed safety question will require prior NRC approval in accordance with 10 CFR 50.59(c).

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change the surveillance requirements. The NRC staff has determined that the amendments involve 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 amendments involve no significant hazards consideration, and there has been no public comment on such finding (61 FR 55309). Accordingly, the amendments meet 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 amendments.

### 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

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