

Public Service
Electric and Gas
Company

Steven E. Miltenberger
Vice President -
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Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 339-4199

April 28, 1988
NLR-N87170

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

Gentlemen:

REQUEST FOR AMENDMENT
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

In accordance with the requirements of 10CFR50.90, Public Service Electric and Gas Company (PSE&G) hereby transmits a request for amendment of Facility Operating License NPF-57 for Hope Creek Generating Station (HCGS). In accordance with the requirements of 10CFR170.21, a check in the amount of \$150.00 is enclosed. In accordance with the requirements of 10CFR50.91(b)(1), a copy of this request has been sent to the State of New Jersey as indicated below.

This amendment request contains revisions to Technical Specifications 3.0.4, 4.0.3, and 4.0.4, Applicability (see Attachment 2), revisions to the Bases Section for 3/4.0 (see Attachment 3) and the individual specifications with references to Specification 3.0.4 removed (see Attachment 4). These changes conform to the guidance provided in Generic Letter 87-09 dated June 4, 1987 which received specialized NRC technical review prior to its issuance. Our request is, therefore, deemed to be a Category 2 amendment, administrative in nature, that achieves consistency generically throughout the technical specifications. Attachment 1 contains further discussion and justification for these proposed revisions. This amendment request, pending the necessary review and approval, requires no special consideration regarding the date of issuance or effective date.

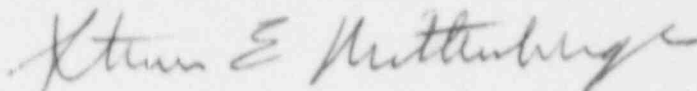
This submittal includes one (1) signed original, including affidavit, and thirty-seven (37) copies pursuant to 10CFR50.4(b)(2)(ii).

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Should you have any questions on the subject transmittal, please do not hesitate to contact us.

Sincerely,



Attachments

- C Mr. G. W. Rivenbark
USNRC Licensing Project Manager
- Mr. R. W. Borchardt
USNRC Senior Resident Inspector
- Mr. W. T. Russell, Administrator
USNRC Region I
- Mr. D. M. Scott, Chief
Bureau of Nuclear Engineering
Department of Environmental Protection
380 Scotch Road
Trenton, NJ 08628

Ref: LCR 87-15

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

Steven E. Miltenberger, being duly sworn according to law deposes and says:

I am Vice President and Chief Nuclear Officer of Public Service Electric and Gas Company, and as such, I find the matters set forth in our letter dated April 28, 1988, concerning Facility Operating License NPF-57 for Hope Creek Generating Station, is true to the best of my knowledge, information and belief.

Steven E. Miltenberger

Subscribed and Sworn to before me
this 28th day of April, 1988

Eileen M. Ochs

EILEEN M. OCHS
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires July 16, 1992

Notary Public of New Jersey
My Commission expires on _____

ATTACHMENT 1

PROPOSED CHANGE TO
TECHNICAL SPECIFICATIONS
HOPE CREEK GENERATING STATION

Ref. LCR 87-15

DESCRIPTION OF CHANGE

In accordance with the guidance provided by NRC Generic Letter 87-09:

- ° Revise, as described below and as delineated on the attached marked-up pages, the general requirements on the applicability of Limiting Conditions for Operation and Surveillance Requirements in Sections 3.0.4, 4.0.3 and 4.0.4 of the Hope Creek Generating Station Technical Specifications;
- ° Delete noted exceptions to Specification 3.0.4 from individual specifications where Operational Condition changes would not be precluded by the revised Specification 3.0.4 ...as delineated on the attached marked-up pages; and,
- ° Update the Bases Section to reflect the modifications made to the above sections and to incorporate, as well, NRC proposed improvements to the bases for unchanged portions of Sections 3.0 and 4.0 ...as delineated on the attached marked-up pages.

SPECIFICATION 3.0.4 should be revised to read as follows:

"3.0.4 Entry into an OPERATIONAL CONDITION or other specified condition shall not be made when the conditions for the Limiting Conditions for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications."

SPECIFICATION 4.0.3 should be revised to read as follows:

"4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment."

SPECIFICATION 4.0.4 should be revised by the addition of the following statement at the end of the existing specification:

"This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements."

REASON FOR CHANGE

NRC Generic Letter 87-09 provides resolution of several specific problems that have been encountered with the general requirements on the applicability of Limiting Conditions for Operation and Surveillance Requirements in Standard Technical Specifications Sections 3.0 and 4.0 and with the clarity of some of the Bases for the requirements of those sections. In the Generic Letter, NRC encourages licensees and applicants to propose changes to their Technical Specifications (TS) consistent with the guidance provided in the letter. The suggested modifications have been reviewed by PSE&G and found to constitute an improvement to the Hope Creek Generating Station TS.

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

SPECIFICATION 3.0.4.

In 10 CFR 50.36, the definition of a Limiting Condition for Operation (LCO) is given as the lowest functional capability or performance level of equipment required for safe operation of the facility. Additionally it is stated that when an LCO is not met, the licensee shall shut down the reactor or follow any remedial ACTION permitted by the Technical Specification (TS) until the LCO can be met.

The TS include two basic types of ACTION Requirements that are applicable when an LCO is not met. The first specifies remedial actions that will permit continued operation of the facility...that is, conformance to the ACTION Requirements provides an acceptable level of safety as long as the remedial ACTION Requirements are met. The second ACTION Requirement specifies a period of time during which operation may continue while an inoperable component or system is restored to operable status or a parameter is restored to within acceptable limits...in this case restoration to acceptable status must be completed in the specified time limit or action taken to shut down the facility by placing it in a condition in which the LCO does not apply.

Specification 3.0.4 states that entry into an Operational Condition shall not be made unless the LCO is met without reliance on the provisions of the ACTION Requirements... even when the ACTION Requirements, if met, would permit continued operation of the facility in a higher Operational Condition for an unlimited time.

As stated in Generic Letter 87-09, many of the individual specifications that have ACTION Requirements that allow continued operation also note that Specification 3.0.4 does not apply. However, the exceptions to Specification 3.0.4 have been inconsistently applied and their bases are not well documented.

Since the stated NRC staff position regarding this TS is that conformance to the ACTION Requirements provides an acceptable level of safety, there is no significant increase in the probability or consequences of any previously evaluated accident or malfunction of equipment important to safety for the proposed change to TS 3.0.4.

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS - CONT'DSPECIFICATION 4.0.3

Since the vast majority of surveillances demonstrate that systems or components are OPERABLE, it is overly conservative to assume that a system or component is inoperable solely because a surveillance requirement has not been performed. When a surveillance is missed, it is primarily a question of unverified operability which can be demonstrated by performance of the specified surveillance whereas the present TS 4.0.3 assumes immediate equipment inoperability. Since the allowable outage time limits of some Action Requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, a time limit which includes a delay of 24 hours is proposed as an acceptable period in which to complete a missed surveillance.

The 24 hour period, provided in the guidance in Generic Letter 87-09, balances the risks associated with allowing continued operation during the completion of the missed surveillance against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a plant shutdown to comply with Action Requirements before the surveillance can be completed. There is no significant increase in the probability or consequences of any previously evaluated accident or malfunction of equipment important to safety due to this proposed change.

SPECIFICATION 4.0.4

The present specification prohibits entry into Operational Conditions when Surveillance Requirements have not been met for that Operational Condition. Conformance with this TS can conflict with Action Requirements that require a change in Operational Conditions when Surveillance Requirements that were not applicable in the previous Condition become applicable and have not been performed in the required time interval. The potential for a plant upset and challenge of safety systems is heightened when surveillances are performed during a plant shutdown solely to comply with Action Requirements. Allowing passage through or to an Operational Condition required by an Action Requirement as proposed in this change will not significantly increase the probability or consequences of any previously evaluated accident or malfunction of equipment important to safety.

SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS - CONT'D

The proposed changes to TS 3.0.4, 4.0.3 and 4.0.4 do not create the possibility of a new or different kind of accident from any previously evaluated because there is no change to existing plant equipment, procedures, or operating parameters caused by these changes.

These proposed changes do not involve a significant reduction in any margin of safety. Conversely, they:

- 1) Resolve the problem of inconsistent application of exceptions to Specification 3.0.4,
- 2) Clarify the applicability of Action Requirements wherein the present Specification 4.0.3 would cause unnecessary plant shutdowns when surveillance intervals are inadvertently exceeded, specify a time limit concluded by the NRC staff to be acceptable for completing a missed surveillance under certain circumstances, and clarify when a missed surveillance constitutes a violation of the Operability Requirements of an LCO, and,
- 3) Eliminate potential conflict between Technical Specifications 4.0.3 and 4.0.4.

Therefore the potential for unnecessary shutdowns, delayed startups, plant upsets and challenges to safety systems will be reduced by implementation of the proposed changes.

Deletion of exceptions to Specification 3.0.4 from those individual Specifications identified in the attached marked-up pages is suggested in Generic Letter 87-09 to avoid confusion regarding applicability.

Based on the above, we have determined that these proposed changes do not involve a Significant Hazards Consideration.

ATTACHMENT 2