



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 19 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 April 28, 1988, Public Service Electric & Gas Company (licensee) requested an amendment to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. The proposed amendments would change the Hope Creek Generating Station (HCGS) Technical Specifications based on the recommendations provided by the staff in Generic Letter 87-09 related to applicability of limiting conditions for operation (LCO) and surveillance requirements of Technical Specification Sections 3.0 and 4.0.

Specifically, the licensee has requested the following revisions to Technical Specifications.

- Specification 3.0.4 revised to define when its provisions apply (i.e. when the affected action statements permit continued operation for an unlimited period of time) instead of defining when the provisions of Specification 3.0.4 do not apply. Action statements stating that the provisions of Section 3.0.4 do not apply are deleted throughout the Technical Specifications.
- Specification 4.0.3 revised to incorporate a 24-hour delay in implementing action requirements due to a missed surveillance when the action requirements provide a restoration time that is less than 24 hours.
- Specification 4.0.4 revised to clarify that "This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements."

2.0 EVALUATION

The proposed changes to the HCGS Technical Specifications 3.0.4, 4.0.3, and 4.0.4 are consistent with the related staff positions outlined in the Generic Letter 87-09 dated June 4, 1987. The changes proposed by the licensee are compared with staff positions in the following paragraphs.

#### Technical Specification 3.0.4

In the Generic Letter 87-09 the staff took the following position related to Specification 3.0.4 changes which will prevent inconsistent application of Specification 3.0.4:

"Specification 3.0.4 unduly restricts facility operation when conformance to the Action Requirements provides an acceptable level of safety for continued operation. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with those Action Requirements. This is consistent with NRC's regulatory requirements for an LCO. The restriction on a change in operational modes or other specified conditions should apply only where the Action Requirements establish a specified time interval in which the LCO must be met or a shutdown of the facility would be required. However, nothing in this staff position should be interpreted as endorsing or encouraging a plant startup with inoperable equipment. The staff believes that good practice should dictate that the plant startup should normally be initiated only when all required equipment is operable and that startup with inoperable equipment must be the exception rather than the rule."

This staff position allows the licensee to change Specification 3.0.4 to define the conditions under which its requirements apply. Generic Letter 87-09 proposed the following replacement wording for Specification 3.0.4:

"Entry into an OPERATIONAL MODE 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 MODE 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."

The licensee's proposed change to Specification 3.0.4 conforms to the above staff proposal and is therefore acceptable. With the change to Specification 3.0.4, the Action Statement notes stating when the provisions of Section 3.0.4 do not apply are no longer appropriate, and their deletion is acceptable.

#### Technical Specification 4.0.3

In the Generic Letter 87-09, the staff took the following position related to Specification 4.0.3:

"It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The opposite is in fact the case; the vast majority of surveillances demonstrate that systems or components in fact are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance. Because 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, the Technical Specifications should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff has concluded that, based on these considerations, 24-hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the Action Requirements are less than this time limit or when shutdown Action Requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with Action Requirements before the surveillance can be completed.

Although a missed surveillance would generally be completed in less time than this 24-hour limit allows, special circumstances may require additional time to ensure that the surveillance can be conducted in a safe manner. The time limits of Action Requirements for surveillances should start when it is identified that Surveillance Requirements have not been performed, except when the 24-hour delay is allowed in the implementation of the Action Requirements. Where the 24-hour time limit is allowed, the time limits of the Action Requirements are applicable either at the end of the 24-hour limit if the surveillance has not been completed or at the time the surveillance is performed if the system or component is found to be inoperable.

Several issues need to be clarified regarding the additional 24-hour time limit. First, this limit does not waive compliance with Specification 4.0.2. Under Specification 4.0.3, the failure to perform a Surveillance Requirement will continue to constitute noncompliance with the Operability Requirements of an LCO and to bring into play the applicable Action Requirements.

Second, Specifications 3.0.2 and 4.0.3 should not be misinterpreted. Specification 3.0.2 notes that a TS is being complied with when the Action Requirements are met within the specified time intervals. Although Specification 4.0.2 provides an allowance for extending the surveillance interval and allows for the completion of the surveillance within this time interval without violation of this Specification, under

Specification 4.0.3 nonperformance of a Surveillance Requirement, within the allowed surveillance interval defined by Specification 4.0.2, constitutes a violation of the Operability Requirements of an LCO, as defined by Specification 4.0.3, and is subject to enforcement action. ...

Third, even though an additional 24-hour time limit may apply for missed surveillances, another consideration is the possibility that plant conditions may preclude the performance of the specified requirements. The provision of a 24-hour delay in the application of the Action Requirements for the completion of a missed surveillance would provide time to obtain a temporary waiver of a Surveillance Requirement that could not otherwise be completed because of current plant conditions. If a surveillance can be performed only when the plant is shutdown, there are only two options available to licensees when a missed surveillance is discovered during power operation and continued operation is not allowed under the Action Requirements. The first is to shutdown the plant and perform the required surveillance. The other option is to seek relief from the Surveillance Requirement. ...."

This staff position allows Specification 4.0.3 to be revised to clarify when a missed surveillance constitutes a violation of the Operability Requirements of an LCO and to clarify the applicability of the Action Requirements and the time during which the limits apply. Generic Letter 87-09 proposed the following wording for Specification 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."

Specification 4.0.3 previously included the statement that exceptions to it are stated in individual specifications. This statement is deleted because Specification 4.0.3 is always applicable, i.e., the implied exceptions for individual specifications do not exist.

The licensee has proposed a revised Specification 4.0.3 which is identical to the above staff proposal. The proposed revision to Specification 4.0.3 is therefore acceptable.

#### Technical Specification 4.0.4

In the Generic Letter 87-09, the staff took the following position relative to Specification 4.0.4:

"The potential for a plant upset and challenge to safety systems is heightened if surveillances are performed during a shutdown to comply with Action Requirements. It is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with Action Requirements and it should not apply when mode changes are imposed by Action Requirements. Accordingly, Specification 4.0.4 should be modified to note that its provisions shall not prevent passage through or to operational modes as required to comply with Action Requirements. A similar provision is included in Specification 3.0.4 "

Generic Letter 87-09 proposed the following wording to clarify Specification 4.0.4 for mode changes as a consequence of Action Requirements:

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

The proposed change proposed a change to Specification 4.0.4 which is identical to the staff proposal. The proposed change is therefore acceptable.

#### ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. 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 this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this 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 this amendment.

#### 4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (53 FR 22406) on June 15, 1988 and consulted with the State of New Jersey. No public comments were received and the State of New Jersey did not have any comments.

The staff 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributor: G. Rivenbark

Dated: September 28, 1988