

Public Service
Electric and Gas
Company

Corbin A. McNeill, Jr.
Vice President -
Nuclear

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609 339-4800

September 12, 1986
NLR-N86126

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

Attention: Ms. Elinor Adensam, Director
Project Directorate 3
Division of BWR Licensing

Dear Ms. Adensam:

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

In accordance with the Atomic Energy Act of 1954, as amended and the regulations thereunder, we hereby transmit copies of our request for amendment and our analyses of the changes to Facility Operating License NFP-57 for the Hope Creek Generating Station.

This application meets the intent of 10CFR 50.91(a)(5) for emergency classification since immediate approval is needed to prevent an unnecessary delay in plant startup.

The emergency situation occurred due to failure of a North Plant Vent Radioactive Effluent Flow Monitoring Instrument. The flow instrument was declared inoperable at 1300 hours on August 16, 1986. Technical Specification 3.3.7.10, allows continued discharge via the affected pathway, as long as flow rate is calculated at least once every 4 hours, for only 30 days and then requires that releases via the affected pathway be terminated. This situation occurred due to an unanticipated equipment failure which could not be avoided through any actions by PSE&G and which, following initial troubleshooting and repair attempts, was further complicated by an initial unavailability of replacement parts. The defective instrument was taken to the vendor for repair and, concurrently, a replacement unit was located and installed. However, in spite of concerted efforts on the part of station instrument technicians, the new flow instrument does not appear to be capable of being satisfactorily calibrated before exceeding the present 30 day discharge limit.

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Based on the above, releases via the North Plant Vent must be terminated at 1300 hours on September 15, 1986. This action would require shutdown if the plant were at power and will preclude plant startup until the necessary repairs are completed. Additionally, another instrument affected by the 30 day termination limit on discharge was declared inoperable on September 3, 1986. It presently appears that this instrument will require an appreciable time to effect complete repairs, such that the change will also provide relief from a potential shutdown at the end of the 30 day limit for that instrument's affected pathway.

Pursuant to the requirements of 10CFR.91, the State of New Jersey has been notified verbally and, as indicated below, has been sent a copy of this request.

This submittal includes three (3) signed originals and forty (40) copies. A check in the amount of \$150.00 will be forwarded shortly in compliance with the fee requirements of 10 CFR170.21.

Sincerely,

CA McNeill Jr / JTB
CM

Enclosure

C Mr. D. H. Wagner
Licensing Project Manager

Mr. R. W. Borchardt
Senior Resident Inspector

Mr. Gerald Nichols, Assistant Director
Bureau of Radiation Protection
Department of Environmental Protection
380 Scotch Road
Trenton, N.J. 08628

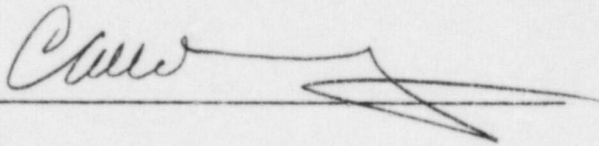
Honorable Charles M. Oberly, III
Attorney General of the State of Delaware
Department of Justice
820 North French Street
Wilmington, DE 19801

Ref: LCR - HC86-05

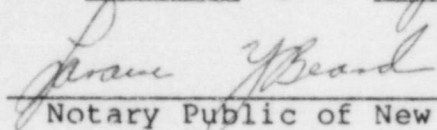
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

Corbin A. McNeill, Jr., being duly sworn according to law deposes and says:

I am Vice President of Public Service Electric and Gas Company, and as such, I find the matters set forth in our letter dated September 12, 1986 concerning our request for Amendment to Facility Operating License NPF-57 are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 15th day of September, 1986



Notary Public of New Jersey

LARAIN Y. BEARD
Notary Public of New Jersey
My Commission Expires May 1, 1991

My Commission expires on _____

PROPOSED CHANGE TO TECHNICAL SPECIFICATIONS
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

DESCRIPTION OF CHANGE

Revise Technical Specifications sections 3.3.7.9 and 3.3.7.10 to agree with the attached changed pages. These changes will reword the ACTION and TABLE NOTATION portions of the affected specifications to be consistent with the intent of the radiological environmental technical specifications and to be the same as the comparable specifications that are in place at other similar plants.

The revisions would require, as they do presently, an explanation in the Semiannual Radiological Release Report, subsequent to any effluent monitoring instrument inoperability of more than 30 days, why the inoperability was not corrected in a timely manner. The changes would also allow continued use of release pathways for which effluent monitoring instruments may not be OPERABLE as long as grab samples and analyses and/or flow rate calculations are made at frequencies specified in the existing ACTION STATEMENTS and TABLE NOTATION. However, present wording in the Hope Creek Technical Specifications must be interpreted, as presently written, to require termination of all releases, via a pathway for which an effluent monitor is inoperable, after 30 days...regardless of any sampling, analysis, or calculational capabilities available at that time. This requirement, in most cases, will necessitate a plant shutdown.

REASON FOR CHANGE

As stated above, if any effluent monitoring instrument inoperability for a period of over 30 days requires termination of releases via the affected pathway, this would, in most cases, lead directly to a plant shutdown. This is particularly true for the gaseous effluent pathway monitoring instruments.

The following points are offered as arguments against the continued use of the present wording in the specifications:

- ° Both Technical Specifications sections affected by this request contain exclusions from the applicability of Specifications 3.0.3 and 3.0.4 which indicate an intention to not require plant shutdown for situations covered in these specifications.
- ° Inspection of final draft specifications for a comparable BWR, (Nine Mile Point 2) show effluent monitoring instrument specifications essentially identical to those being proposed for this change.

REASON FOR CHANGE (Cont'd)

- ° Inspection of in-place specifications for other plants and review of original RETS guidance documents indicate that the 30 day requirement is and was intended as a reporting requirement and that the continued use of any pathway was dependent on specific sampling and analyses actions and was not limited by the 30 day reporting requirement.

The ramifications of the present specification wording as compared to what was understood to be the original intent were not noticed during review of draft specifications and were, therefore, not identified as requiring revision prior to issuance of the operating license. It was only upon suffering an inoperable effluent monitoring instrument that the need for a change in the specifications became apparent.

NO SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

This change in effluent monitoring instrumentation technical specifications allows the continued use of an effluent pathway while an instrument that monitors that pathway may be inoperable. Present wording of the specification allows continued use of the affected pathway for up to 30 days if prescribed sampling and analyses are performed and requires a report if the inoperable instrumentation is not restored in that time. Allowing continued use of the affected pathway beyond 30 days will not significantly increase the probability or consequences of an accident previously evaluated since prescribed sampling and analysis of any discharges via that pathway would be continued while the monitoring instrumentation is inoperable.

The possibility for any previously unanalyzed accident is not created by this change since there is no physical change to any plant fission product boundary, safeguards equipment, or any procedure.

While there may be some reduction in the plant's ability to make continuous, instantaneous evaluations of discharge levels with a monitoring instrument inoperable beyond the present 30 day limit, there are sampling and calculational methods available for making those determinations which provide adequate assurance that no margin of safety is significantly reduced by implementing this change.

Based on the above, we have determined that operation of the Hope Creek Station with this requested change in place would not involve a significant hazards consideration.

Additionally, since this change may involve some small reduction in a margin of safety, but operation of the plant will remain within the guidelines of section 11.5 of the Standard Review Plan, this request corresponds to example (vi) of the guidance provided the Commission regarding changes Not Likely To Involve A Significant Hazards Consideration.