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PSEG
Nuclear LLC

MAY 10 2016

10 CFR 50.90

LR-N16-0093
LAR S16-03

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Salem Nuclear Generating Station Units 1 and 2
Renewed Facility Operating License Nos. DPR-70 and 75
NRC Docket Nos. 50-272 and 50-311

Subject: **License Amendment Request to Extend the Implementation Period for Salem Unit 1 License Amendment No. 311 and Salem Unit 2 License Amendment No. 292**

Reference: 1. PSEG letter to NRC, "Implementation Schedule Change for License Amendment Request to Isolate Unborated Water Sources and Use Gamma-Metrics Post-Accident Neutron Monitors during Mode 6 (Refueling)," dated February 3, 2016 (ADAMS Accession No. ML16034A265)

In accordance with 10 CFR 50.90, PSEG Nuclear LLC (PSEG) hereby requests an amendment to Renewed Facility Operating License Nos. DPR-70 and 75 for Salem Nuclear Generating Station Units 1 and 2. In accordance with 10 CFR 50.91(b)(1), a copy of this request for amendment has been sent to the State of New Jersey.

The proposed change is requesting approval of a license amendment to extend the implementation period for Salem Unit 1 License Amendment No. 311 and Salem Unit 2 License Amendment 292.

By letter dated March 7, 2016, the NRC issued License Amendment No. 311 for Salem Unit 1 and License Amendment No. 292 for Salem Unit 2, with an implementation period of 120 days. The 120 day implementation period requires the amendments to be implemented no later than July 5, 2016. As discussed in Reference 1, PSEG originally requested the approval of the amendments to support planned modifications to replace the existing source range and intermediate range nuclear instrumentation during the Unit 1 Spring 2016 refueling outage (1R24). Prior to the Salem 1R24 outage PSEG elected to move the replacement of the source range and intermediate detectors from the 1R24 outage to the Fall 2017 refueling outage (1R25). PSEG, in Reference 1, requested the implementation period of 120 days to allow for implementation following the current 1R24 refueling outage.

As a result of unforeseen changes in outage scope, PSEG is requesting the implementation date to be extended from 120 days to prior to Mode 6 entry for the Unit 1 Fall 2017 (1R25) outage and prior to Mode 6 entry for the Unit 2 Spring 2017 (2R22) outage to align with the outages for the replacement of the source range and intermediate range detectors.

Attachment 1 to this letter provides an evaluation supporting the proposed change.

PSEG requests NRC approval of the proposed License Amendment by July 5, 2016.

These proposed changes have been reviewed by the Plant Operations Review Committee.

If you have any questions or require additional information, please contact Brian Thomas at (856) 339-2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on MAY 10 2016
(Date)

Respectfully,

John F. Perry
Site Vice President
Salem Generating Station

Attachments:

1. License Amendment Request to Extend the Implementation Period for Salem Unit 1 License Amendment No. 311 and Salem Unit 2 License Amendment No. 292

cc: Mr. D. Dorman, Administrator, Region I, NRC
Mr. T. Wengert, Project Manager, NRC
NRC Senior Resident Inspector, Salem
Mr. P. Mulligan, Chief, NJBNE
Mr. L. Marabella, Corporate Commitment Tracking Coordinator
Mr. T. Cachaza, Salem Commitment Tracking Coordinator

SALEM GENERATING STATION
RENEWED FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
DOCKET NO. 50-272 AND 50-311

License Amendment Request to Extend the Implementation Period for Salem Unit 1 License Amendment No. 311 and Salem Unit 2 License Amendment No. 292

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1.0 SUMMARY DESCRIPTION

This license amendment request is to extend the implementation period for Salem Unit 1 License Amendment No. 311 and Salem Unit 2 License Amendment No. 292. PSEG Nuclear LLC (PSEG) proposes to extend the implementation period associated with Unit 1 Amendment No. 311 and Unit 2 Amendment No. 292 from 120 days to prior to Mode 6 entry for the Unit 1 Fall 2017 (1R25) outage and prior to Mode 6 entry for the Unit 2 Spring 2017 (2R22) outage.

By letter dated March 7, 2016, the NRC issued License Amendment No. 311 for Salem Unit 1 and License Amendment No. 292 for Salem Unit 2. The amendments created a new Technical Specification (TS) Limiting Condition for Operation (LCO) 3.9.2.1 for Unborated Water Source Isolation Valves in Mode 6. TS LCO 3.9.2.1 isolates unborated water sources in Mode 6, which precludes a boron dilution event. The amendment also revised the neutron flux instrumentation requirements in Mode 6 by removing the existing requirement for one source range neutron flux monitor with audible indication in the containment and control room during Mode 6.

The amendment was effective as of the date of issuance and is required to be implemented within 120 days (by July 5, 2016).

2.0 DETAILED DESCRIPTION

The 120 day implementation period requires the amendments to be implemented no later than July 5, 2016. As discussed in Reference 1, PSEG originally requested the approval of the amendments to support planned modifications to replace the existing source range and intermediate range nuclear instrumentation during the Unit 1 Spring 2016 refueling outage (1R24). Prior to the Salem 1R24 outage PSEG elected to move the replacement of the source range and intermediate detectors from the 1R24 outage to the Fall 2017 refueling outage (1R25). PSEG, in Reference 1, requested the implementation period of 120 days to allow for implementation following the current 1R24 refueling outage.

As a result of unforeseen changes in outage scope, PSEG is requesting the implementation date to be extended from 120 days to prior to Mode 6 entry for the Unit 1 Fall 2017 (1R25) outage and prior to Mode 6 entry for the Unit 2 Spring 2017 (2R22) outage to align with the outages for the replacement of the source range and intermediate range detectors. The 120 day amendment implementation period could require Operations, Maintenance and Engineering resources to be diverted from essential outage activities when the existing TS requirements and plant procedures would continue to ensure the plant is operated consistent with the current licensing basis requirements for a boron dilution event during Mode 6.

3.0 TECHNICAL EVALUATION

The request for extending the implementation period is not a technical or safety issue. The proposed change is purely an administrative change. In issuing an amendment to an operating license, the NRC staff states when the amendment is effective and when the amendment must be implemented. These dates are given in the Enclosure of the amendment and are part of the operating license for the plant. Although, there are no regulatory requirements on the implementation date specified in an amendment, the licensee is required by the operating license to fully implement the amendment by the date specified (i.e., by a date no later than that specified).

Extending the implementation period of Salem Unit 1 Amendment No. 311 and Salem Unit 2 Amendment No. 292 does not pose any nuclear safety impact. During the current 1R24 outage, Salem Unit 1 will continue to comply with the existing Mode 6 TS 3.9.2 requirements. Current TS 3.9.2 requirements will continue to ensure the plant is operated consistent with the Salem Updated Final Safety Analysis Report (UFSAR) accident analysis for a boron dilution event during Mode 6.

4.0 REGULATORY EVALUATION

4.1 No Significant Hazards Consideration

In accordance with 10 CFR 50.90, PSEG Nuclear LLC (PSEG) hereby requests an amendment to Renewed Facility Operating License Nos. DPR-70 and 75 for Salem Nuclear Generating Station Units 1 and 2. The proposed license amendment extends the implementation period specified in Salem Unit 1 License Amendment No. 311 and Salem Unit 2 License Amendment No. 292 from 120 days to prior to Mode 6 entry for the Unit 1 Fall 2017 (1R25) outage and prior to Mode 6 entry for the Unit 2 Spring 2017 (2R22) outage. This extension will allow completion of the current Salem Unit 1 refueling outage under the existing Technical Specification (TS) 3.9.2 requirements.

PSEG has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed amendment implementation schedule extension is administrative in nature and does not require any modifications to or change in operation of plant systems or components. The extension of the amendment implementation period does not increase the probability or consequences of an accident previously evaluated in the Updated Final Safety Analysis (UFSAR). Current Technical Specification (TS) 3.9.2 requirements will continue to ensure the plant is operated consistent with the UFSAR accident analysis for a boron dilution event.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed amendment implementation schedule extension is administrative in nature. The extension of the amendment implementation does not require any physical plant modifications, does not alter any plant systems or components, and does not change the operation of the plant. Current TS 3.9.2 requirements will continue to

ensure the plant is operated consistent with the UFSAR accident analysis for a boron dilution event.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No.

Margin of safety is related to the confidence in the ability of the fission product barriers to perform their intended functions. These barriers include the fuel cladding, the reactor coolant system pressure boundary, and the containment. The proposed TS change is administrative in nature and does not affect any of these barriers. Current TS 3.9.2 requirements will continue to ensure the plant is operated consistent with the UFSAR accident analysis for a boron dilution event.

Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Based upon the above, PSEG Nuclear LLC concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92, and, accordingly, a finding of no significant hazards consideration is justified.

4.2 Applicable Regulatory Requirements and Criteria

The proposed change has been evaluated to determine whether applicable regulations and requirements continue to be met. PSEG has determined that the proposed change does not require any exemptions or relief from regulatory requirements other than the operating license. The following applicable regulations and regulatory requirements were reviewed in making this determination: 10 CFR 50.90, 10 CFR 50.91, and 10 CFR 50.92.

4.3 Precedents

Two similarly related license amendments involving extensions to license amendment implementation periods were approved in 2015 and are summarized below:

1. Limerick Generating Station Unit 2 – Issuance of Exigent Amendment Re: Extend Implementation Period for Amendment No. 174 – Leak Detection System Setpoint and Allowable Value Changes (TAC No. MF5695), dated February 25, 2015 (ADAMS Accession No. ML15049A084). The license amendment extended the implementation period for Amendment No. 174 from 60 days to prior to startup from the spring 2015 refueling outage. There were no actual changes to the Technical Specifications.

2. Columbia Generating Station – Issuance of Amendment Re: Extension of Implementation Period for Amendment No. 232 Changing Technical Specification Table 3.3.1.1-1 Function 7, "SCRAM DISCHARGE VOLUME WATER LEVEL – HIGH" (Exigent Circumstances) (TAC No. MF6234), dated June 11, 2015 (ADAMS Accession No. ML15154A800). The license amendment extended the implementation period for Amendment No. 232 from refueling outage R-22 (ongoing at the time of the request) to prior to restarting from refueling outage R-23 scheduled for spring 2017. There were no actual changes to the Technical Specifications.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. PSEG letter to NRC, "Implementation Schedule Change for License Amendment Request to Isolate Unborated Water Sources and Use Gamma-Metrics Post-Accident Neutron Monitors during Mode 6 (Refueling)," dated February 3, 2016 (ADAMS Accession No. ML16034A265)

2. PSEG letter to NRC, "License Amendment Request to Isolate Unborated Water Sources and Use Gamma-Metrics Post-Accident Neutron Monitors during Mode 6 (Refueling)," dated March 9, 2015 (ADAMS Accession No. ML15068A359)

3. NRC letter to PSEG, "Salem Nuclear Generating Station, Unit Nos.1 and 2 – Issuance of Amendments Regarding New Technical Specifications to Isolate Unborated Water Sources in Mode 6 (CAC Nos. MF5831 and MF5832)," dated March 7, 2016 (ADAMS Accession No. ML16035A087)