

Public Service
Electric and Gas
Company

Joseph J. Hagan

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-1200

Vice President - Nuclear Operations

AUG 19 1994

NLR-N94150
LCR 94-30

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

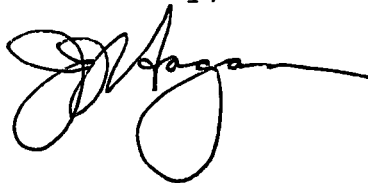
Gentlemen:

REQUEST FOR AMENDMENT
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311

The proposed change requests the addition of a new action statement to Technical Specifications 3.1.3.2.1, Position Indication Systems - Operating for both Salem Units. As discussed in Attachment 1 to this letter, PSE&G's conclusion is that granting this request would not involve a significant hazards consideration. Attachment 2 contains the Technical Specifications marked up pages.

Upon NRC approval of this proposed change, PSE&G requests that the amendment be made effective on the date of issuance, and to be implemented within sixty (60) days to provide sufficient time for associated administrative activities.

Sincerely,



9408300319 940819
PDR ADOCK 05000272
P PDR

ADD 1

AUG 19 1994

Document Control Desk
NLR-N94150

2

Attachment (2)

C Mr. J. C. Stone, Licensing Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. C. S. Marschall (S09)
USNRC Senior Resident Inspector

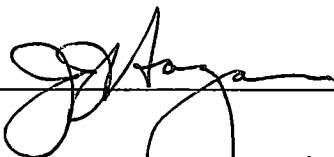
Mr. T. T. Martin, Administrator - Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Kent Tosch, Manager, VI
New Jersey Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

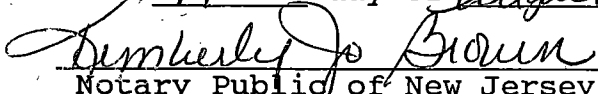
NLR-N94150
LCR 94-30

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

J. J. Hagan, being duly sworn according to law deposes and says:
I am Vice President - Nuclear Operations of Public Service
Electric and Gas Company, and as such, I find the matters set
forth in the above referenced letter, concerning the Salem
Generating Station, Unit No. 1, are true to the best of my
knowledge, information and belief.



Subscribed and Sworn to before me
this 19th day of August, 1994



Notary Public of New Jersey

My Commission expires on _____

KIMBERLY JO BROWN
NOTARY PUBLIC OF NEW JERSEY
~~My Commission Expires April 21, 1998~~

I. DESCRIPTION OF THE PROPOSED CHANGES

- IA Proposed change adds a new action statement (b) to Limiting Condition for Operation (LCO) 3.1.3.2.1 for both Salem Units.

The new action (b) will read;

With two or more analog rod position indicators per bank inoperable, within one hour restore the inoperable rod position indicator(s) to OPERABLE status or be in Hot Standby within the next 6 hours. A maximum of one rod position indicator per bank may remain inoperable following the hour, with Action (a) above being applicable from the original entry time into the LCO.

- IB As a result of the above proposed change the presently existing action statement (b) should be changed to (c).

II. REASON FOR THE PROPOSED CHANGES

- IIA The proposed change adds a new Action Statement to the LCO. Thus eliminating the need to enter Technical Specification (T.S.) 3.0.3 whenever two or more individual rod position indications (IRPIs) are lost during adjustment.

- IIB The proposed change is an editorial change to accomodate the addition of the new action statement requirement.

III. JUSTIFICATION AND EVALUATION OF THE SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES OF THE REQUEST

IIIA

The analog rod position indication system is designed to provide actual individual rod position indication (IRPI) to the control board Dixon modules, the SPDS computer, the P-250 computer, and locally at the IRPI rack via the Digital Multi Meter (DMM).

Due to electronic drift IRPIs occasionally need to be adjusted. Components that require adjustment/recalibration are the Dixon modules and the Signal Conditioning Modules (SCM).

Each Dixon module provides indication for two rods, dual channels. This arrangement provides for a better utilization of space in the control room, and facilitates performance of the required rod control system technical specification surveillances. To adjust an IRPI the Dixon module must be removed from service and placed in an extender card. Because of the duality of the Dixon module, whenever one is removed for single IRPI adjustment two IRPI indications are lost.

The loss of indication lasts approximately 30 seconds, the time it takes to remove the Dixon from the control board and place it in the extender card. Following the adjustment evolution, which normally takes a few minutes, indication is again lost in returning the Dixon back to the control board.

The Westinghouse analog rod position indication design is such that the SCM ground wire for each of the 13 VDC power supplies is daisy-chained. Electronic drift that involves adjustment of the SCM also requires placing the SCM in an extender card. This evolution has a high potential of shorting out the main DC power supplies. Failure of either the main or auxiliary power supplies could result in the total loss of IRPI indication and a potentially complex corrective maintenance activity depending on the number of power supplies affected. To prevent this situation the power supplies fuse is removed. Removal of this fuse causes a total loss of indication; however, this temporary loss of indication only lasts approximately 30 seconds, which is the time necessary to remove/replace the SCM.

However, since in both cases more than one analog position indication is lost and the present technical specification does not provide for an action statement within the confines of the LCO, entry into technical specification 3.0.3 is required.

Technical Specification 3.0.3 requires, in part, that;

When a Limiting Condition for Operation is not met as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in a MODE in which the specification does not apply by placing it, as applicable, in :

1. At least HOT STANDBY within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

Entry into T.S. 3.0.3 is reportable via the License Event Report (LER) as a condition prohibited by T.S. The proposed change would eliminate this unnecessary reporting.

The proposed change does not alter the operator response or operator response time. The proposed change incorporates, into the applicable LCO, the action requirements already established in technical specification 3.0.3.

The proposed change is consistent with NUREG 1431 Vol.1 (Standard Technical Specifications Westinghouse Plants) issued November 1992. Since the LCO is only applicable in Modes 1 and 2, the proposed new action only requires to place the unit in HOT STANDBY (Mode 3), which is the first operational mode in which the LCO is no longer applicable.

The proposed change is also more conservative than NUREG 1431, which allows for either continued (reduced) power operation with one or more rod position indication inoperable or up to 4 hours to determine the rod(s) position.

IIIB

The proposed change is a notation change due to the addition of a new action statement.

No physical changes to the facility are proposed by either change.

IV. DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

The discussion below applies to both proposed changes.

This proposed Amendment request:

1. Does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The request (both proposed changes) does not change any assumption or parameter assumed to function in any of the design/licensing basis analysis, and therefore the probability or consequences of an accident previously evaluated are not increased. The change, as described in section IB, incorporates into the applicable LCO the action statement which is already taken under technical specification 3.0.3, and does not alter the operator response or response time.

2. Does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not introduce any design or physical configuration changes to the facility which could create new accident scenarios.

NLR-N94150
LCR 94-30

ATTACHMENT 1

3. Does not involve a significant reduction in a margin of safety.

As stated in response to question number 1 above, the change does not change any assumption or parameter assumed to function in any of the design/licensing basis analysis. No changes to the operator response or operator response time is proposed, only that the response is now taken under the confines of the LCO.

Therefore, there is no reduction in any margin of safety from the proposed changes.

NLR-N94150
LCR 94-30

ATTACHMENT 2

Insert A

- b) With two or more analog rod position indicators per bank inoperable, within one hour restore the inoperable rod position indicator(s) to OPERABLE status or be in Hot Standby within the next 6 hours. A maximum of one rod position indicator per bank may remain inoperable following the hour, with Action (a) above being applicable from the original entry time into the LCO.

REACTIVITY CONTROL SYSTEMS

POSITION INDICATION SYSTEMS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.3.2.1 The shutdown and control rod position indication systems shall be OPERABLE and capable of determining the actual and demanded rod positions as follows:

- a. Analog rod position indicators, within one hour after rod motion (allowance for thermal soak);

All Shutdown Banks: + 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 200-228 steps.

Control Bank A: + 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 200-228 steps.

Control Bank B: + 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 160-228 steps.

Control Banks C and D: + 12 steps of the group demand counters for withdrawal range of 0-228 steps.

- b. Group demand counters; + 2 steps of the pulsed output of the Slave Cyclor Circuit over the withdrawal range of 0-228 steps.

APPLICABILITY: MODES 1 and 2.

ACTION:

- a. With a maximum of one analog rod position indicator per bank inoperable either:
1. Determine the position of the non-indicating rod(s) indirectly by the movable incore detectors at least once per 8 hours and within one hour after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of the rod's position, or
 2. Reduce THERMAL POWER to less than 50% of RATED THERMAL POWER within 8 hours.

INSERT A

- c. With a maximum of one group demand position indicator per bank inoperable either:

REACTIVITY CONTROL SYSTEMS

POSITION INDICATION SYSTEMS - OPERATING

LIMITING CONDITION FOR OPERATION

3.1.3.2.1 The shutdown and control rod position indication systems shall be OPERABLE and capable of determining the actual and demanded rod positions as follows:

- a. Analog rod position indicators, within one hour after rod motion (allowance for thermal soak);

All Shutdown Banks: + 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 200-228 steps.

Control Bank A: + 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 200-228 steps.

Control Bank B: + 12 steps of the group demand counters for withdrawal ranges of 0-30 steps and 160-228 steps.

Control Banks C and D: + 12 steps of the group demand counters for withdrawal range of 0-228 steps.

- b. Group demand counters; + 2 steps of the pulsed output of the Slave Cyclor Circuit over the withdrawal range of 0-228 steps.

APPLICABILITY: MODES 1 and 2.

ACTION:

- a. With a maximum of one analog rod position indicator per bank inoperable either:
1. Determine the position of the non-indicating rod(s) indirectly by the movable incore detectors at least once per 8 hours and within one hour after any motion of the non-indicating rod which exceeds 24 steps in one direction since the last determination of the rod's position, or

INSERT A

2. Reduce THERMAL POWER to less than 50% of RATED THERMAL POWER within 8 hours.

- C. X. With a maximum of one group demand position indicator per bank inoperable either: