



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038

Nuclear Department

APR 23 1993  
NLR-N93050  
LCR 93-01

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

Gentlemen:

LICENSE AMENDMENT APPLICATION  
VENTING THROUGH THE HARDENED TORUS VENT  
HOPE CREEK GENERATING STATION  
FACILITY OPERATING LICENSE NPF-57  
DOCKET NO. 50-354

This letter submits an application for amendment to Appendix A of Facility Operating License NPF-57 for the Hope Creek Generating Station, and is being filed in accordance with 10CFR50.90. This amendment request would revise the Technical Specification for Radioactive Effluents Venting or Purging by allowing the Mark I containment drywell to be vented through the hardened torus vent following Type A Integrated Leakage Rate testing.

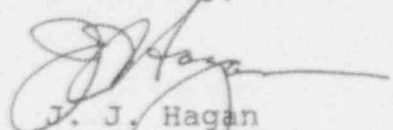
A description of the requested amendment, supporting information and analyses for the change, and the basis for a no significant hazards consideration determination are provided in Attachment 1. The Technical Specification pages affected by the proposed change are marked-up in Attachment 2.

Pursuant to the requirements of 10CFR50.91(b)(1), a copy of this request for amendment has been sent to the State of New Jersey.

Upon NRC approval of this proposed change, PSE&G requests that the amendment be made effective on the date of issuance, but implemented prior to utilization of the hardened torus vent to provide sufficient time for associated administrative activities.

Should you have any questions regarding this request, we will be pleased to discuss them with you.

Sincerely,

  
J. J. Hagan  
Vice President -  
Nuclear Operations

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The power is in your hands  
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P PDR

APR 23 1993

Affidavit  
Attachments (2)

C Mr. T. T. Martin, Administrator - Region I  
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Mr. S. Dembek, Licensing Project Manager  
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Mr. T. P. Johnson (S09)  
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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 Hope Creek  
Generating Station, are true to the best of my knowledge,  
information and belief.



Subscribed and Sworn to before me  
this 23rd day of April, 1993

  
Notary Public of New Jersey

SHERRY L. CAGLE  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires March 5, 1997

My Commission expires on \_\_\_\_\_

ATTACHMENT 1  
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

LICENSE AMENDMENT APPLICATION  
VENTING THROUGH THE HARDENED TORUS VENT  
FACILITY OPERATING LICENSE NPF-57  
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I. DESCRIPTION OF THE PROPOSED CHANGES

As indicated on the marked-up pages in Attachment 2, PSE&G requests that:

- 1) Technical Specification 3.11.2.8, Radioactive Effluents Venting or Purging, be revised such that venting or purging of the Mark I containment through the hardened torus vent is permitted to depressurize the drywell following Type A Integrated Leakage Rate testing of the containment.
- 2) Surveillance Requirement 4.11.2.8 be revised to state that venting or purging of the containment through the hardened torus vent is permitted to depressurize the drywell following Type A Integrated Leakage Rate testing.

II. REASON FOR THE CHANGES

Pursuant to the recommendations of NRC Generic Letter 89-16 and NRC Document SECY 89-017, PSE&G had committed to the voluntary installation of a hardened torus vent (HTV) at the Hope Creek Generating Station under the provisions of 10CFR50.59. This commitment was stated in PSE&G letter NLR-N89220, dated October 30, 1989. The primary benefit derived from the HTV installation was the reduction of risk associated with the TW (loss of decay heat removal) sequence by providing a hard pipe vent capable of withstanding the anticipated severe accident pressure loadings instead of utilizing a low pressure design venting pathway containing sheet metal ductwork.

In addition to this function, the HTV can also provide a monitored pathway for containment pressure relief following Type A Integrated Leakage Rate Tests. The venting of the Mark I containment drywell through the HTV would replace the current method of venting (via various paths with many release points to the secondary containment) with a single vent path to the atmosphere through the HTV. This method will provide a simpler and quicker means of isolating a depressurization release if it should become necessary at any time. No venting via the HTV will be performed following a Type A Integrated Leakage Test until adequate drywell atmosphere samples have been obtained from the

Drywell Leak Detection Radiation Monitoring System (DLD-RMS) sample skid and a Gaseous Effluent Permit has been obtained and approved.

### III. JUSTIFICATION FOR THE CHANGE

Type A Integrated Leakage Rate Tests of the containment are performed at periodic intervals (40 months  $\pm$  10 months) throughout the lifetime of the plant. Currently, upon completion of the Type A test, the Mark I containment drywell is vented via various pathways to the secondary containment. This proposed change, however, utilizes a single venting pathway for drywell depressurization following Type A testing in order to provide the operator with a simpler and quicker means of terminating drywell venting in the unlikely event that it should become necessary.

No venting via the HTV will be performed until adequate drywell atmosphere samples have been obtained from the DLD-RMS sample skid and a Gaseous Effluent Permit has been obtained and approved, however, venting via the HTV provides a monitored and scrubbed pathway, with radiation alarms annunciated both locally and in the control room to key the operator into taking action to terminate a potential release. If a high radiation level alarm is received, the operator would remotely close the HTV isolation valve, and initiate containment atmosphere cleanup via the Filtration, Recirculation, and Ventilation System and the Containment Prepurge Cleanup System. Plant operating procedures will be revised or developed as necessary to incorporate the actions described above.

### IV. Significant Hazards Consideration Evaluation

PSE&G has, pursuant to 10 CFR 50.92, reviewed the proposed amendment to determine whether our request involves a significant hazards consideration. We have determined that operation of the Hope Creek Generating Station in accordance with the proposed changes:

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

A review of the accident scenarios described in the UFSAR Chapter 15 indicated that venting of the Mark I containment via the hardened torus vent (HTV) following a Type A Integrated Leakage Rate Test will neither significantly increase the likelihood of those accidents from occurring nor significantly affect the performance of any system

involved in the occurrence or mitigation of the subject accidents. The venting of the containment drywell through the HTV will replace the current method of venting (via various paths to the secondary containment) with a single vent path. The probability of accidents previously evaluated and the consequences of accidents previously evaluated will not change. As there are no modifications to equipment or logic, all equipment will fail in the same manner as before.

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

The proposed change will not increase the probability of accidents of a different type, nor will it create malfunctions of a different type than any previously evaluated in the SAR. This proposal only changes the venting pathway for the depressurization of the Mark I containment following a Type A Integrated Leakage Rate Test from venting via various pathways to venting via one central pathway, the HTV.

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

The proposed changes do not alter or affect any of the Technical Specification dose rate limits nor do they reduce the margin of safety as defined in the basis for the Technical Specifications. No depressurization via the HTV will be performed until adequate drywell atmosphere samples have been obtained from the DLD-RMS sample skid and a Gaseous Effluent Permit has been obtained and approved.

#### V. Conclusion

Based on the preceding discussion, PSE&G has concluded that the proposed change to the Technical Specifications does not involve a significant hazards consideration insofar as the change: (i) does not involve a significant increase in the probability or consequences of an accident previously evaluated, (ii) does not create the possibility of a new or different kind of accident from any accident previously evaluated, and (iii) does not involve a significant reduction in the margin of safety.