

Public Service
Electric and Gas
Company

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Vice President and Chief Nuclear Officer

JUL 28 1994

NLR-N94110

LCR 94-16

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

Gentlemen:

**LICENSE AMENDMENT APPLICATION
REVISION AND RELOCATION OF EDG FUEL OIL SURVEILLANCE REQUIREMENTS
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. 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.

The proposed Technical Specification changes contained herein represent changes to Section 3/4.8.1 "AC Sources." The revised specification removes the surveillance requirements, methodology and frequency for Emergency Diesel Generator (EDG) fuel oil from the Technical Specifications and relocates them in a controlled plant procedure, VSH.SS-CA.ZZ-0013(Q) "Procedure for Testing Diesel Fuel and #2 Fuel Oil at Artificial Island for PSE&G Nuclear Operations." The changes also delete an unnecessary lab test for the fuel oil and extends the surveillance frequency from once per 92 days to once per 184 days.

The proposed changes have been evaluated in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and it has been determined that this request involves no significant hazards considerations.

In response to the NRC Cost Beneficial Licensing Action (CBLA) initiative, Public Service Electric & Gas (PSE&G) met with the NRR Staff on November 12, 1993, to discuss our CBLA Program. PSE&G considers this submittal a CBLA. We have estimated that under optimal conditions, the proposed changes would yield a cost savings of 14,000 \$/yr at Hope Creek. Savings over the life of the plant are estimated to be \$448,000.

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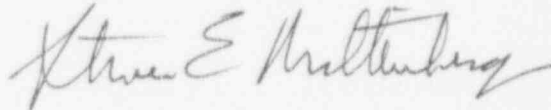
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A description of the requested amendment, supporting information and analyses for the change, and the basis for a no significant hazards consideration determination are provided in Attachment 1. The Technical Specification pages affected by the proposed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

Upon NRC approval of this proposed change, PSE&G requests that the amendment be made effective on the date of issuance, but implemented within sixty days 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,



Affidavit
Attachments (2)

C Mr. T. T. Martin, Administrator - Region I
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Mr. J. C. Stone, Licensing Project Manager -
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One White Flint North
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Mr. C. S. Marschall (S09)
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Mr. K. Tosch, Manager IV
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CN 415
Trenton, NJ 08625

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

S. E. Miltenberger, being duly sworn according to law deposes and says:

I am Vice President and Chief Nuclear Officer 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.

Steve E. Miltenberger

Subscribed and Sworn to before me
this 28th day of July, 1994

Kimberly Jo Brown
Notary Public of New Jersey

My Commission expires on _____

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

ATTACHMENT 1

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

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I. DESCRIPTION OF THE PROPOSED CHANGES

This amendment revises specification 4.8.1.1.2.f regarding Emergency Diesel Generator (EDG) fuel oil quality surveillance. The change replaces the current Surveillance Requirements with:

"In accordance with the surveillance interval specified in the Diesel Fuel Oil Testing Program and prior to the addition of new fuel oil to the storage tank, samples shall be taken to verify fuel oil quality. Sampling and testing of new and stored fuel oil shall be in accordance with the Diesel Fuel Oil Testing Program to maintain fuel oil properties within established limits."

The replaced Surveillance Requirements are relocated to the Diesel Fuel Oil Testing Program and the tested parameters revised to reflect the requirements established in Regulatory Guide 1.137, Revision 1 and ASTM-D975-77. In addition, the surveillance frequency for stored fuel oil is revised in the Diesel Fuel Oil Testing Program from once per 92 days to once per 184 days.

II. REASONS FOR THE CHANGE

The current Surveillance Requirements specify that stored fuel oil shall be sampled and tested once per 92 days. Surveillance Requirement 4.8.1.1.2.f also requires that new fuel oil shall be sampled and tested prior to addition to the storage tanks. The samples are to be obtained in accordance with ASTM-D4057 and the fuel oil properties tested as specified in Regulatory Guide 1.137, ASTM-D975-77, and ASTM-D2274-70.

These requirements were reviewed against NUREG-1433 "Standard Technical Specifications for General Electric Boiling Water Reactors (BWR/4)" and applicable American Society for Testing and Materials (ASTM) standards.

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The Standard Technical Specifications (STS) allows for the removal of EDG fuel oil surveillance frequency and surveillance methodology from the Technical Specifications and relocation in a controlled plant procedure. This is consistent with the Commission's policy statement on Technical Specification improvements, SECY-93-067. This change along with the elimination of an unnecessary lab test and the reduction in surveillance frequency will allow better allocation of plant resources while maintaining a high confidence in fuel oil quality and EDG operability.

III. JUSTIFICATION FOR CHANGES

The surveillance requirements for EDG fuel oil currently requires testing for the following properties:

- * water and sediment content
- * kinematic viscosity
- * specific or API gravity
- * total insolubles (impurity level)
- * % ash
- * % sulfur
- * flashpoint
- * cloudpoint
- * cetane number
- * copper corrosion
- * distillation (90%)
- * ramsbottom carbon

In comparing these parameters against those specified by RG 1.137 and recommended by ASTM-D975-77, PSE&G has determined that deleting the test for total insolubles will not alter the accuracy of the surveillance in establishing fuel oil quality assurance. It was also noted that ASTM-D-2274-70, which provides guidance for determining impurity levels in the fuel oil, had been withdrawn April 1974. This change is, therefore, justifiable since the removal of this unnecessary lab test when compared with those specified by the Commission in RG 1.137 will not adversely affect EDG fuel oil quality or EDG operability while improving utilization of plant resources.

PSE&G's request for extending the EDG fuel oil surveillance interval from 92 days to 184 days is based on past test results for fuel oil quality. A review of these test results going back 2 years indicate that stored fuel oil quality has consistently remained within the acceptable limits of the Technical Specification requirements. The affects of long

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term storage of fuel oil shows up as an insignificant increase in particulates, mostly due to oxidation. The presence of these particulates does not prevent the fuel oil from burning properly in the EDG's. The Commission's position on surveillance frequencies, established in the STS, is to take into consideration fuel oil degradation trends that indicate that particulate concentration is unlikely to change significantly between frequency intervals. Therefore, based on fuel oil quality history, PSE&G feels that the request for surveillance interval extension is justifiable.

PSE&G has reviewed Hope Creek Generating Station's technical specification status regarding the applicability of adopting the STS fuel oil surveillance requirement position. Given the historical data supporting Hope Creek's fuel oil quality and the detailed nature of PSE&G's diesel fuel oil testing program, PSE&G believes that relocating the EDG fuel oil surveillance requirements from the Technical Specifications to a plant controlled procedure will not result in any reduction in EDG operability and will continue to ensure high fuel oil quality. PSE&G believes that this proposed change is justifiable based on the Commission's policy position, SECY-93-067, providing "... an allowance for licensees to adopt portions of the improved Standard Technical Specifications"

IV. DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

PSE&G has, pursuant to 10CFR50.92, reviewed the proposed amendment to determine whether our request involves a significant hazards consideration. We have determined that the 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.

The proposed change to delete a test not required by Regulatory Guide 1.137 or ASTM-D975-77 will not result in degradation of fuel oil quality below acceptable limits. Based on established fuel oil quality history, the proposed increase in surveillance frequency from once per 92 days to once per 184 days will not significantly decrease confidence in fuel oil quality and EDG operability, nor will the relocation of fuel oil quality surveillance from the Technical Specifications to the Diesel Fuel Oil Testing Program have any effect on established plant practices in regards to the testing of

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EDG fuel oil. The proposed changes involve no hardware changes, no changes to the operation of any systems or components, and no changes to existing structures. Therefore, these changes will not alter or impact previously evaluated accidents.

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

The proposed changes are procedural in nature concerning fuel oil testing and, therefore, will not directly impact the operation of any plant safety related component or equipment. Any reduction in fuel oil quality will not be significant or result in a decrease in EDG operability. Therefore, these changes will not create a new or unevaluated operating condition.

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

The proposed changes concern how EDG fuel oil quality is to be determined, how frequently this determination is to be performed, and how to control the process for determining fuel oil acceptability, and therefore EDG operability. There are no associated safety margins and the only margin of concern is that of fuel oil combustibility due to the presence of either contaminants or particulate buildup from long term storage. Based on historical data, PSE&G believes that EDG fuel oil quality will not be affected or impacted by the proposed changes. Therefore, the proposed amendment does not involve any reduction in a safety margin.

V. CONCLUSIONS

Based on the above, PSE&G has determined that the proposed changes do not involve a significant hazards consideration.