

Public Service
Electric and Gas
Company

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Vice President and Chief Nuclear Officer

AUG 30 1994

NLR-N94141
LCR 94-17

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

Gentlemen:

LICENSE AMENDMENT APPLICATION
LOOSE PARTS DETECTION SYSTEM RELOCATION
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NO. 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 changes will relocate the Loose Parts Detection System (LPDS) from the Technical Specifications (TS) to the Updated Final Safety Analysis Report. Removal of the LPDS from the TS is consistent with the NRC Final Policy Statement on TS Improvements. In addition, the proposed revisions offer the opportunity to minimize resource demands upon the NRC and Public Service Electric & Gas (PSE&G). As a result of the proposed changes, subsequent revisions to the LPDS can be processed in accordance with 10CFR50.59 as opposed to 10CFR50.90.

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.

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.

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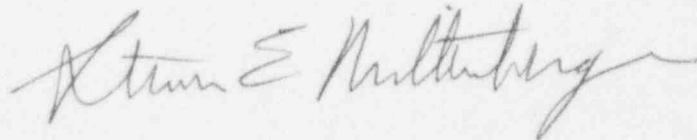
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In accordance with the requirements presented in the Final Policy Statement (58 FR 39138), the proposed changes have received a multidisciplinary review by responsible technical supervisory personnel, including onsite operations personnel.

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,

A handwritten signature in cursive script, appearing to read "Steven E. Muthenberg".

Affidavit
Attachments (2)

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Mr. D. Moran, Licensing Project Manager -
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Mr. R. Summers (S09)
USNRC Senior Resident Inspector

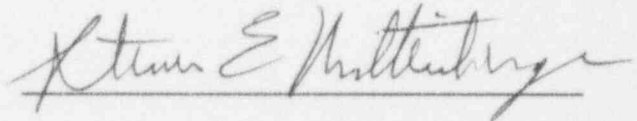
Mr. K. Tosch, Manager IV
NJ Department of Environmental Protection
Division of Environmental Quality
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CN 415 Trenton, NJ 08625

REF: NLR-N94141


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.



Subscribed and Sworn to before me
this 30th 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

ATTACHMENT 1
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

LICENSE AMENDMENT APPLICATION
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HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NO. NPF-57
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I. DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes to the Hope Creek Generating Station (HCGS) Technical Specifications (TS) will remove the specifications associated with the Loose-Part Detection System (LPDS). Specifically, TS 3.3.7.9 "Loose-Part Detection System," Surveillance Requirement 4.3.7.9, associated Bases and the index will be revised to indicate that the LPDS has been removed. The LPDS will subsequently be relocated to the Updated Final Safety Analysis Report (UFSAR).

II. REASONS FOR THE CHANGES

The proposed changes will relocate the LPDS from the TS to the UFSAR. Removal of the LPDS from TS is consistent with the NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors (58 FR 39132). As noted in the Final Policy Statement, the purpose of TS is to impose conditions or limitations on reactor operation which are necessary to avoid the possibility of an abnormal situation or an immediate threat to the public health and safety by identifying those features of controlling importance to safety and establishing on them certain conditions of operation which cannot be changed without prior NRC approval.

Retaining the LPDS within the TS is not consistent with the Final Policy Statement. The function of the LPDS is to detect and alarm for loose parts in the Reactor Coolant System (RCS) (UFSAR Section 7.5.1.3.7.2). The LPDS is intended to be used for informational purposes only and is not a safety related system (UFSAR Section 7.5.1.3.7.6). Plant operators do not rely solely on the LPDS or information provided by the LPDS for the performance of any safety-related action (UFSAR Section 7.5.1.3.7.6). Therefore, based on the Final Policy Statement and LPDS

design, Public (PSE&G) proposes to relocate the LPDS from the TS to the UFSAR.

The proposed revisions offer the opportunity for a more efficient utilization of resources. Removal of the LPDS from the TS would allow PSE&G to process subsequent changes under the provisions of 10CFR50.59 as opposed to 10CFR50.90. This will minimize the demands upon the NRC Staff and PSE&G.

The proposed changes are consistent with the improved Standard Technical Specifications (STS) (NUREG-1433, "Standard Technical Specifications General Electric Plants," BWR/4). In response to the Interim Report on Technical Specification Improvements, the LPDS was identified as an item which could be removed from the improved STS and relocated to other licensee controlled documents (e.g., the UFSAR). The improved STS do not contain limiting conditions for operation (LCO), surveillance requirements (SRs) or a bases for the LPDS.

III. JUSTIFICATION FOR CHANGES

The proposed changes will relocate the LPDS from the TS to the UFSAR. This change is based on a review of industry initiative on TS improvements and a plant specific assessment of this amendment. Each of these areas is further addressed as follows:

Industry Initiative on TS Improvements

On February 6, 1987, the NRC published its Interim Policy Statement on Technical Specification Improvements for Nuclear Power Plants in the Federal Register (52 FR 3788). In part, the Interim Policy Statement provided the criterion to be utilized in determining which requirements need to be governed by the TS. The goal of the policy statement was to assure that TS requirements are consistent with 10CFR50.36 and have a sound safety basis.

In 1987, based on the Interim Policy Statement, the four nuclear steam supply system (NSSS) owners groups submitted proposals identifying requirements in the existing STS that could be relocated from the STS to

other licensee controlled documents.

The NRC Staff reviewed the owners group submittals and published its conclusion in the report "NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications," (Split Report) dated May 9, 1988. The Split Report identified which STS requirements must be retained in the new STS (having met one or more of the criterion) and those which could be relocated (having met none of the criterion).

The Split Report identified the LPDS as an item which could be relocated from the TS to other licensee controlled documents. The LPDS met none of the screening criterion of the Interim Policy Statement.

Plant Specific Assessment of LPDS Relocation

The above relocation for the LPDS was developed in accordance with the Interim Policy Statement. However, on July 22, 1993, the NRC published the Final Policy Statement on Technical Specification Improvements for Nuclear Power Plants in the Federal Register (58 FR 39132). The Final Policy Statement reflected public comments on the Interim Policy Statement and experience gained in developing the improved STS. The Final Policy Statement criterion was used to assess applicability of the proposed changes to the HCGS.

As previously noted, LCO's which did not meet the screening criterion of the Final Policy Statement could be proposed for relocation from the TS. Consistent with this guidance, a plant specific assessment of the Final Policy Statement against the HCGS LPDS is as follows:

Criterion 1 - Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

This criterion is intended to ensure that the Technical Specifications control those instruments specifically installed to detect excessive reactor coolant system leakage (58 FR 39137). The function of the LPDS is to detect and alarm for

loose parts in the RCS (UFSAR Section 7.5.1.3.7.2). The LPDS does not indicate that there is a degradation in the reactor coolant pressure boundary. A loose part could possibly result in fuel channel failure, flow blockage or component degradation. Detection of such damage is not consistent with the design of the LPDS. However, if this damage would occur it would be detected by existing control and monitoring instrumentation or during periodic inspections (e.g., fuel failure from fuel bundle flow blockage would be detected by radiation monitoring).

As part of the Final Policy Statement on Technical Specification Improvements (58 FR 39137), it was noted that instrumentation such as the LPDS which functions to detect precursors to reactor coolant pressure boundary leakage should not be interpreted to be included in Criterion 1.

Consequently, the LPDS does not meet Criterion 1.

Criterion 2 - A process variable, design feature or operating restriction that is an initial condition of a Design Basis Accident (DBA) or Transient analyses that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

The purpose of this criterion is to capture those process variables that have initial values assumed in transient analyses, and which are monitored and controlled during power operation (58 FR 39137). The LPDS is not a safety-related system (UFSAR Section 7.5.1.3.7.6). Presence/detection of loose parts does not function as an initial condition of a DBA or Transient Analyses. The LPDS does not involve process variables chosen as reference bounds in the DBA or Transient analyses which are monitored and controlled during power operation.

Consequently, the LPDS does not meet Criterion 2.

Criterion 3 - A structure, system or component that is part of the primary success

path and which functions or actuates to mitigate a DBA or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

It is the intent of this criterion to capture into Technical Specifications only those structures, systems and components that are part of the primary success path of a safety sequence analysis (58 FR 39137). The LPDS is intended to be used for informational purposes only and is not a safety-related system (UFSAR Section 7.5.1.3.7.6). Plant operators do not rely solely on this system or information provided by this system for the performance of any safety-related action (UFSAR Section 7.5.1.3.7.6).

Consequently, the LPDS does not meet Criterion 3.

Criterion 4 - A structure system or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

It is the intent of this criterion that those requirements that Probabilistic Safety Assessment (PSA) or operating experience exposes as significant to public health and safety, consistent with the Commission's Safety Goal and Severe Accident Policies, be retained or included in TS (58 FR 39137). The relocation of the LPDS from the TS does not result in a significant increase of core damage frequency or offsite release. The LPDS is not modeled in the Hope Creek Probabilistic Risk Assessment.

Consequently, the LPDS does not meet Criterion 4.

Upon approval of the proposed changes, the LPDS will be relocated to the UFSAR. Subsequent changes to LPDS requirements would require a review, in accordance with the provisions of 10CFR50.59 to determine if an unreviewed safety question exists.

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 changes relocate the Loose Parts Detection System (LPDS) from the Technical Specifications (TS) to the UFSAR. Subsequent changes to LPDS requirements would require a review, in accordance with the provisions of 10CFR50.59 to determine if an unreviewed safety question exists.

Relocation of the LPDS is consistent with the NRC Final Policy Statement on TS improvements. In part, the Final Policy Statement provides screening criterion to evaluate TS requirements for the purpose of relocation to other licensee controlled documents. Limiting Conditions for Operation (LCOs) which do not meet any of the Final Policy Statement criterion may be proposed for relocation. The LPDS does not satisfy any of the Final Policy Statement screening criterion.

The proposed changes do not affect any material conditions of the plant that could directly contribute to causing or mitigating the effects of an accident. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed changes do not involve any changes to plant structures, systems or

components. Also, the proposed changes were compared to the criterion presented in the Final Policy Statement. The proposed changes do not meet any of the screening criterion presented in the Final Policy Statement and, therefore, may be proposed for relocation from the TS.

Upon approval of the proposed changes, the LPDS will be relocated to the UFSAR. Subsequent changes to LPDS requirements would require a review, in accordance with the provisions of 10CFR50.59 to determine if an unreviewed safety question exists.

The relocation of the LPDS from the TS does not result in a significant increase of core damage frequency or offsite release. The LPDS is not modeled in the Hope Creek Probabilistic Risk Assessment.

These proposed changes do not affect equipment or its operation. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

The proposed changes do not involve a significant reduction in the margin of safety. These changes were compared against the screening criterion of the Final Policy Statement. The changes do not meet any of the Final Policy Statement screening criterion and, therefore, may be proposed for relocation from the TS.

V. CONCLUSION

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

ATTACHMENT 2
LICENSE AMENDMENT APPLICATION
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