

Public Service
Electric and Gas
Company

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Vice President and Chief Nuclear Officer

SEP 29 1994

NLR-N94117

LCR 94-18

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

Gentlemen:

LICENSE AMENDMENT APPLICATION
REMOVAL OF SEISMIC AND METEOROLOGICAL INSTRUMENTATION
FROM THE TECHNICAL SPECIFICATIONS
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 Sections 3/4.3.7.2 "Seismic Monitoring Instrumentation" and 3/4.3.7.3 "Meteorological Instrumentation." The proposed revision removes the specifications from the Technical Specifications and relocates the appropriate descriptive information and testing requirements in the Hope Creek Updated Final Safety Analysis Report (UFSAR).

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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SEP 29 1994

Document Control Desk
NLR-N94117

-2-

In accordance with the guidance presented in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" as published in the Federal Register (58 FR 39132), 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,



Affidavit
Attachments (2)

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

Mr. D. Moran, Licensing Project Manager - Hope Creek
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Mr. R. Summers (S09)
USNRC Senior Resident Inspector

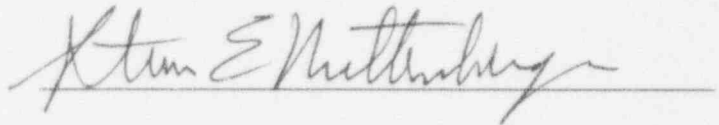
Mr. K. Tosch, Manager IV
NJ Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

REF: NLR-N94117
LCR 94-18


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 29th day of September, 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

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NLR-N94117
LCR 94-18

I. DESCRIPTION OF THE PROPOSED CHANGES

This amendment removes Specifications 3/4.3.7.2 "Seismic Monitoring Instrumentation" and 3/4.3.7.3 "Meteorological Monitoring Instrumentation" and their associated Bases from the Technical Specifications with corresponding changes to the Table of Contents.

II. REASONS FOR THE CHANGE

The proposed changes to the Technical Specifications conforms with the NRC's current policy, SECY-93-067, of improving the Technical Specifications. During the development of NUREG-1433 "Standard Technical Specifications, General Electric Plants, BWR/4" the NRC issued a letter to the B&W Owners Group, T.E. Murley to W.S. Wilgus dated May 9, 1988, which identified seismic and meteorological instrumentation as Limiting Conditions for Operation (LCO) which may be relocated to other licensee-controlled documentation contingent upon NRC staff approval of the location of and controls over relocated requirements. Through this submittal, PSE&G is requesting implementation of the NRC's recommendations regarding seismic and meteorological technical specifications. Relocation of these Technical Specifications, with the exception of the Special Report requirements, to the Updated Final Safety Analysis Report (UFSAR) would reduce regulatory burden. Future changes will be conducted using the 10CFR50.59 process.

III. JUSTIFICATION FOR CHANGES

The current Technical Specifications regarding seismic and meteorological monitoring instrumentation are due in part to NRC recommendations provided in Regulatory Guides (RG) 1.12 "Instrumentation for Earthquakes" and 1.23 "Meteorological Programs in Support of Nuclear Power Plants," respectively. In addition, 10CFR50.36 provides that the Technical Specifications shall include surveillance requirements to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be

ATTACHMENT 1
REMOVAL OF SEISMIC AND
METEOROLOGICAL INSTRUMENTATION
FROM THE TECHNICAL SPECIFICATIONS

NLR-N94117
LCR 94-18

met. In addition, 10CFR50.36b specifies the inclusion of requirements for reporting and keeping records of environmental data, and any conditions and monitoring requirements for the protection of the nonaquatic environment.

The regulatory guidance utilized for the establishment of the subject Technical Specifications has since been reviewed by the NRC during its recent Technical Specification Improvement Program (TSIP). The purpose of the TSIP was to identify Technical Specifications that could be eliminated or relocated in order to decrease equipment degradation and alleviate unnecessary personnel burden while improving or maintaining plant safety. The NRC staff concluded that if an LCO does not meet any one of four criteria set forth in SECY-93-067, then that LCO and its associated Surveillance Requirements and Bases sections may be proposed for removal from the Technical Specifications and relocated in a licensee-controlled document(s). The NRC further clarified its application of the four criteria as imposing those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

As provided by the NRC in SECY-93-067, neither the seismic or meteorological instrumentation are considered:

- Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary,
- A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier,
- A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier,
- A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

While the meteorological instrumentation is significant to public health and safety in regards to supporting Emergency

ATTACHMENT 1
REMOVAL OF SEISMIC AND
METEOROLOGICAL INSTRUMENTATION
FROM THE TECHNICAL SPECIFICATIONS

NLR-N94117
LCR 94-18

Preparedness and Radiological Assessment, it does not provide constraints of prime importance in limiting the likelihood or severity of analyzed reactor accident scenarios. As established by the NRC when determining those specifications which may be relocated to licensee-controlled documentation, PSE&G believes that this submittal for relocating the seismic and meteorological instrumentation specifications, with the exception of the Special Report requirements, from the Technical Specifications to the UFSAR is justified. The Special Report requirements will be deleted since 10CFR50.36(c)(7) will no longer be applicable to the seismic or meteorological instrumentation. These changes will reduce regulatory burden while maintaining existing levels of plant safety.

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 involve no hardware changes, no changes to the operation of any systems or components, and no changes to existing structures. Neither the relocation of the seismic/meteorological specifications to the UFSAR nor the elimination of the Special Report requirements represent changes that affect plant safety or alter existing accident analyses.

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 the operability and surveillance of instrumentation that are not safety related and will not impact the operation of any plant safety related component or equipment. Therefore, these changes will not create a new or unevaluated accident or operating condition.

ATTACHMENT 1
REMOVAL OF SEISMIC AND
METEOROLOGICAL INSTRUMENTATION
FROM THE TECHNICAL SPECIFICATIONS

NLR-N94117
LCR 94-18

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

In accordance with the guidance provided by the NRC regarding the improvement of Technical Specifications, SECY-93-067, the proposed changes relocate the seismic and meteorological instrumentation portions of the Technical Specifications, with the exception of the Special Report requirements, to the UFSAR. These instruments are not safety related and do not have any associated safety margins which could be affected by this change.

V. CONCLUSIONS

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