

Public Service
Electric and Gas
Company

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Vice President and Chief Nuclear Officer

SEP 29 1994

NLR-N94125

LCR 94-21

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

Gentlemen:

LICENSE AMENDMENT APPLICATION
REVISION OF SRM AND IRM CHANNEL CALIBRATION FREQUENCIES
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 3/4.3.6 "Control Rod Block Instrumentation." This submittal revises the surveillance requirement for channel calibration frequency for the Source Range Monitors and the Intermediate Range Monitors from once per 184 days to once per refuel interval.

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 the proposed changes would yield a cost savings of \$30,000 per refuel cycle at Hope Creek. Savings over the life of the plant are estimated to be \$630,000.

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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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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U. S. Nuclear Regulatory Commission
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Mr. C. S. Marschall (S09)
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Mr. K. Tosch, Manager IV
NJ Department of Environmental Protection
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CN 415
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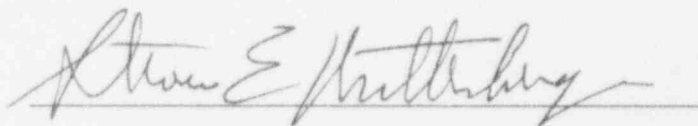


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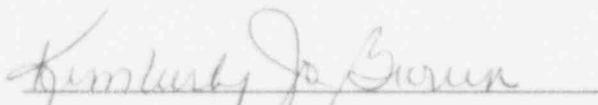
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

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 27th 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

LICENSE AMENDMENT APPLICATION

REVISION OF SRM AND IRM CHANNEL CALIBRATION FREQUENCIES

FACILITY OPERATING LICENSE NPF-57

HOPE CREEK GENERATING STATION

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I. DESCRIPTION OF THE PROPOSED CHANGES

This amendment revises Table 4.3.6-1 "Control Rod Block Instrumentation Surveillance Requirements." The channel calibration frequencies for the Source Range Monitor (SRM) upscale trip function and the downscale trip function are changed from "SA" once per 184 days to "R" once per refuel interval. The same changes are made for the Intermediate Range Monitor (IRM) upscale and downscale trip functions.

II. REASONS FOR THE CHANGE

The proposed changes to the Technical Specifications are consistent with the NRC's recommendation of improving the Technical Specifications by reducing surveillance requirements for testing during power operation, Generic Letter (GL) 93-05. Through this submittal, PSE&G is requesting implementation of the NRC's recommendations regarding the channel calibration frequencies of SRM and IRM trip functions.

III. JUSTIFICATION FOR CHANGES

The control rod block functions are provided to prevent excessive control rod withdrawal. Current Hope Creek Surveillance Requirements for SRM and IRM channel calibrations specify an interval of once per 184 days.

In GL 93-05 the NRC announced its completion of a comprehensive examination of surveillance requirements in technical specifications that require testing during power operation. The results of this effort, part of the NRC's Technical Specification Improvement Program (TSIP), indicated that while the majority of the testing at power was important, safety could still be improved while decreasing equipment degradation and removing unnecessary burdens on personnel resources by reducing the amount of testing that the Technical Specifications require during power operation.

One of the recommendations in GL 93-05 was the extension of channel calibrations for SRM and IRM upscale and downscale trip functions to once each refueling interval. This

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CALIBRATION FREQUENCIES

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recommendation was discussed further in NUREG-1366 "Improvements to Technical Specifications Surveillance Requirements," dated December 1992. The NRC's findings, which included a review of set point trend data for IRMs, was that there was very little drift in equipment calibration. A further consideration was that the IRMs were also being calibrated for compliance with operability requirements for Limiting Conditions for Operability (LCO) for Reactor Protection System (RPS) instrumentation.

Based upon the set point trend data and supported by the current RPS IRM Surveillance Requirement channel calibration frequency of once per refuel interval, the NRC concluded that the channel calibration frequencies for control rod block functions by SRMs and IRMs could be changed to once per refuel interval.

Considering the NRC's aforementioned position and the benefits of reduce regulatory burden while maintaining existing levels of plant safety, PSE&G believes that the proposed changes are justifiable. Based upon a review of Surveillance Requirement results for the past 3 years for SRM and IRM channel calibrations, PSE&G concludes that the proposed changes are compatible with plant operating experience and are consistent with the guidance provided by Generic Letter 93-05.

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. The revision of channel calibration frequencies for the SRM and IRM trip function portion of the control rod block instrumentation represent changes that do not affect plant safety and do not alter existing accident analyses.

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

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The proposed changes are procedural in nature concerning the calibration frequency of instrumentation that have historically shown little set point drift. The channel calibration methodology for the SRM and IRM control rod block trip functions remain unchanged. The proposed changes while slightly increasing the possibility of an undetected instrument error will not create a new or unevaluated accident or operating condition.

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

The proposed changes are in accordance with recommendations provided by the NRC regarding the improvement of Technical Specifications. These changes will result in the perpetuation of current safety margins while reducing regulatory burden and decreasing equipment degradation.

V. CONCLUSIONS

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