

Public Service
Electric and Gas
Company

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Vice President - Nuclear Operations

JAN 20 1995

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

Gentlemen:

**LICENSE AMENDMENT APPLICATION
REVISION OF CONTROL ROD MOVEMENT TEST REQUIREMENT
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 change contained herein represents a change to Section 3/4.1.3 "Control Rods." This submittal revises surveillance requirement 4.1.3.1.2.b for when a control rod is immovable because of excessive friction or mechanical interference. The other control rods shall be tested within twenty four hours and every seven days thereafter as opposed to the current requirement of testing every twenty four hours.

The proposed change has 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 page affected by the proposed change is provided in Attachment 2 with pen and ink changes.

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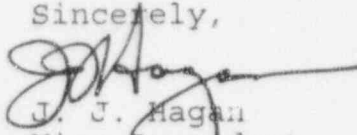
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Upon NRC approval of this proposed change, PSE&G requests that the amendment be made effective on the date of issuance, but implemented within sixty days to provide sufficient time for associated administrative activities.

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

Sincerely,



J. J. Hagan
Vice President
Nuclear Operations

Affidavit
Attachments (2)

C Mr. T. T. Martin, Administrator - Region I
U. S. Nuclear Regulatory Commission
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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

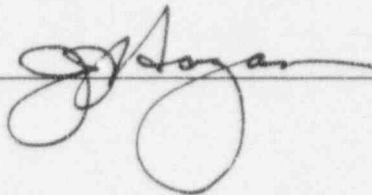
Mr. K. Tosch, Manager IV
NJ Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

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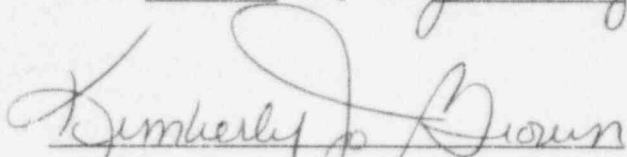
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

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 20th day of January, 1995


Notary Public of New Jersey

KIMBERLY JO BROWN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires April 21, 1996

My Commission expires on _____

ATTACHMENT 1

PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

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I. DESCRIPTION OF THE PROPOSED CHANGE

This amendment revises Surveillance Requirement 4.1.3.1.2.b by replacing the words "At least once per" with "Within."

II. REASONS FOR THE CHANGE

The proposed change to the Technical Specifications is 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 recommendation regarding the frequency of subsequent control rod movement tests when a control rod is found immovable as a result of excessive friction or mechanical interference.

III. JUSTIFICATION FOR CHANGE

The control rods provide negative reactivity for controlling reactor operations and are capable of rapidly establishing a subcritical configuration (e.g., during power transients). The intent of the control rod movement test is to provide confirmation of operability for all withdrawn control rods. The current Hope Creek Surveillance Requirement calls for the performance of a movement test for all withdrawn control rods every 24 hours if any control rod is determined to be immovable due to excessive friction or mechanical interference. This surveillance would require a significant allocation of plant resources.

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.

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One of the recommendations in GL 93-05 was the extension of control rod movement tests from daily to weekly when any control rod is found immovable due to excessive friction or mechanical interference. This 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 the Nuclear Plant Reliability Data System (NPRDS), was that the control rod movement tests took a significant amount of time and personnel resources to perform. Also, a search using NPRDS failed to find a single situation in which an immovable control rod was discovered as a result of this test.

Based upon these findings, the NRC concluded that the control rod movement test frequency for all withdrawn rods could be extended without reducing safety while decreasing equipment degradation and removing unnecessary burdens on personnel resources. The initial movement test would be required within twenty four hours after a control rod had been determined immovable due to excessive friction or mechanical interference. Subsequent control rod movement tests would then be performed every seven days.

Considering the NRC's aforementioned position and the associated benefits, PSE&G believes that the proposed change is justifiable. Based upon a review of Surveillance Requirement results for the past 3 years for control rod movement tests, PSE&G concludes that the proposed change is compatible with plant operating experience and is 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 change:

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

The proposed change involves no hardware changes, no changes to the operation of any systems or components, and no changes to existing structures. The revision of the control rod movement test frequency represents a change that does not affect plant safety and does not alter existing accident analyses.

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

The proposed change is procedural in nature concerning the frequency of control rod movement tests for all withdrawn control rods after a control rod has been determined to be immovable due to excessive friction or mechanical interference. The methodology for determining additional immovable control rods remain unchanged. The proposed change while slightly increasing the possibility of an undetected immovable control rod 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 change is in accordance with recommendations provided by the NRC regarding the improvement of Technical Specifications. This change 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 change does not involve a significant hazards consideration.