

Public Service
Electric and Gas
Company

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Vice President - Nuclear Engineering

DEC 15 1994

NLR-N94213

LCR 94-31

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

Gentlemen:

**LICENSE AMENDMENT APPLICATION
EDG SURVEILLANCE REQUIREMENTS CHANGES
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
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. This request consists of a proposed change to Technical Specification 3/4.8.1.1, "AC Sources - Operating," which includes the requirement to subject each of the diesel generators to an inspection in accordance with the manufacturer's recommendations for this class of standby service. PSE&G proposes to remove this requirement from the Technical Specifications to be consistent with the improved Standard Technical Specifications (NUREG-1433). Plant-controlled programs will continue to govern diesel generator maintenance. This change is similar to that approved by the NRC for Illinois Power's Clinton Generating Station (Docket No. 50-461) in a Safety Evaluation Report dated January 31, 1994.

Attachment 1 contains a detailed description of and justification for the proposed changes. Based upon the justification provided, PSE&G believes that the proposed changes do not involve a significant hazards consideration pursuant to 10CFR50.92.

Attachment 2 contains a marked up Technical Specification page which reflects the proposed changes.

Pursuant to the requirements of 10CFR50.91(b)(1), a copy of this submittal has been sent to the state of New Jersey.

Upon NRC approval, please issue a license amendment which will be effective upon issuance and shall be implemented within 60 days of issuance. This latitude permits appropriate procedural modifications necessary to implement the proposed changes.

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Should you have any questions or comments on this submittal,
please do not hesitate to contact us.

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



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

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

I am Vice President - Nuclear Engineering 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.

S. LaBruna

Subscribed and Sworn to before me
this 15th day of December, 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 THE TECHNICAL SPECIFICATIONS

LICENSE AMENDMENT APPLICATION
EDG SURVEILLANCE REQUIREMENT CHANGES
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354

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I. DESCRIPTION OF THE PROPOSED CHANGES:

In accordance with 10CFR50.90, PSE&G proposes to remove Technical Specification Surveillance Requirement 4.8.1.1.2.h.1, and utilize plant-controlled programs to govern diesel generator maintenance. To ensure procedural consistency and reduce the impact of this change on Hope Creek procedures, the remaining Surveillance Requirements of Technical Specification 4.8.1.1.2.h are not renumbered.

The proposed change is identified on the marked-up copies of the pages from the current Hope Creek Technical Specifications contained in Attachment 2.

II. REASON FOR THE PROPOSED CHANGES:

Hope Creek Technical Specification 3/4.8.1.1 identifies the minimum AC electrical power sources required to be operable during Operational Conditions 1, 2 and 3, as well as the associated actions to be taken in the event these requirements are not met. The Surveillance Requirements for demonstrating the operability of the AC electrical power sources are also prescribed. Technical Specification Surveillance Requirement 4.8.1.1.2.h.1 requires that at least once per 18 months, each diesel generator be subjected to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service. PSE&G proposes to remove this requirement from the Technical Specifications and utilize plant-controlled programs to govern diesel generator maintenance, in order to be consistent with the improved Standard Technical Specifications (NUREG-1433) for BWR/4 plants, and to allow greater flexibility in controlling diesel generator inspection activities under the 10CFR50.59 process.

III. JUSTIFICATION FOR THE PROPOSED CHANGES:

As noted above, the improved Standard Technical Specifications (NUREG-1433) do not specifically include the surveillance requirement to perform an inspection of the diesel generators in accordance with the manufacturer's recommendations. This inspection is a preventative maintenance activity that is assumed to occur under the plant preventative maintenance program. Any changes to the

diesel generator inspection activities governed by current Technical Specification 4.8.1.1.2.h.1 will now be controlled using the 10CFR50.59 process. Thus, the proposed change is consistent with NUREG-1433.

In addition, the NRC has previously concluded in a SER for the Clinton Power Station, dated January 31, 1994, that these inspection and testing provisions could be controlled by the maintenance program because sufficient surveillance requirements are retained in the Technical Specifications to demonstrate the functional capability of the diesel generators.

Since PSE&G will continue to utilize EDG performance history, engineering analyses and manufacturer's recommendations to perform diesel generator inspections/maintenance as appropriate, removal of the Surveillance Requirement 4.8.1.1.2.h.1 from the Technical Specifications will have no detrimental effect on operability or reliability of the diesel generators. The diesel generators will continue to be maintained, under the PSE&G preventative maintenance program, in a manner which ensures system operability, and any changes will be controlled by the 10CFR50.59 process. All other Surveillance Requirements demonstrating that the AC power system functions as required remain unchanged.

IV. SIGNIFICANT HAZARDS CONSIDERATION EVALUATION

PSE&G has, pursuant to 10 CFR 50.92, reviewed the proposed amendment to determine whether the request involves a significant hazards consideration. We have determined that 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 is consistent with the improved Standard Technical Specifications (NUREG-1433) and does not result in any changes to the existing plant design. The Hope Creek preventative maintenance program will utilize diesel generator performance history, engineering analyses and manufacturer's recommendations as appropriate for determining diesel generator inspection requirements. Since the changes do not impact the ability of the diesel generators and the AC electrical power sources to perform their function, the changes do not result in a significant increase in the consequences of any accident previously evaluated. The

diesel generators will continue to function as designed. Therefore, the proposed change will not impact the probability of occurrence of any accident previously evaluated.

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

This request does not result in any change to the plant design nor does it involve a significant change in current plant operation. The diesel generators will be inspected utilizing diesel generator operating history, engineering analyses and manufacturer's recommendations as appropriate, and the remaining surveillance requirements will not be changed. As a result, no new failure modes will be introduced, and the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed request does not adversely impact the reliability of the diesel generators. As stated above, the diesel generator operating history, engineering analyses and the manufacturer's recommendations will be utilized as appropriate to perform the diesel generator inspections. In addition, the diesel generators will continue to perform their design functions. This request does not involve an adverse impact on diesel generator operation or reliability. Since the diesel generator function is not affected by the proposed changes, this request does not involve a significant reduction in a margin of safety.

V. CONCLUSION

As discussed above, PSE&G has concluded that the proposed changes to the Technical Specifications do not involve a significant hazards consideration since the changes: (i) do not involve a significant increase in the probability or consequences of an accident previously evaluated, (ii) do not create the possibility of a new or different kind of accident from any accident previously evaluated, and (iii) do not involve a significant reduction in a margin of safety.