

NUCLEAR DEPARTMENT
LICENSE CHANGE REQUEST

A. IDENTIFICATION

LCR Number 91-04 Station/Unit No. Hope Creek
Sponsor J. Griffin Department Licensing + Regulation
Title/Subject Amendment to Section 4.2.1 of
Environmental Protection Plan

B. DESCRIPTION OF CHANGE: (Attach marked-up text, tables and/or figures)

See Attached

C. JUSTIFICATION FOR CHANGE: (Attach written reasons, and attach or reference supporting documentation, to completely justify proposed change)

See Attached

D. 10CFR50.92: (Attach a Significant Hazards Consideration Evaluation, in accordance with 10CFR50.92, which supports proposed change)

See Attached

E. APPROVALS:

1. Sponsor	<u>Joseph Griffin</u>	Date	<u>5/29/91</u>
2. Department Manager	<u>TX/Mason/Kyle</u>	Date	<u>5/29/91</u>
3. LR Coordinator	<u>Paul J. Thomas</u>	Date	<u>5/29/91</u>
4. Manager - LR	<u>TX/Mason/Kyle</u>	Date	<u>5/29/91</u>
5. Manager - OSR	<u>W. H. Hall</u>	Date	<u>6/4/91</u>
6. SORC Chairman	<u>W. H. Hall</u>	MITG. <u>91-056</u>	Date <u>6/5/91</u>
7. Station GM	<u>[Signature]</u>	Date	<u>6/5/91</u>

F. NRC REVIEW:

Approved in Amendment No. _____ Date _____

-or-

Rejected in letter dated _____ and either:

- (1) Resubmitted as LCR _____ Revision _____
- (2) Further justified in letter dated _____
- (3) Internally cancelled on _____

FORM VPN-008
9-86

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Ref: NLR-N91163

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

S. La Bruna, 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 our letter dated _____, concerning the Hope
Creek Generating Station, are true to the best of my knowledge,
information and belief.

S. La Bruna

Subscribed and Sworn to before me
this 11 day of June, 1991

Elizabeth J. Kidd
Notary Public of New Jersey

My Commission expires on 4/25/95

ELIZABETH J. KIDD
Notary Public of New Jersey
My Commission Expires April 25, 1995

PROPOSED CHANGE TO ENVIRONMENTAL PROTECTION PLAN
HOPE CREEK GENERATING STATION

Description of Change

Replace the existing paragraph in Section 4.2.1., Aquatic Monitoring, of the Environmental Protection Plan, Appendix B of the Hope Creek Facility Operating License, with the attached revised section 4.2.1.

Justification for Change

Under the Endangered Species Act of 1973 a Section 7 Consultation was reopened involving the National Marine Fisheries Service (NMFS), the NRC, and PSE&G to discuss the occurrence of impinged sea turtles on the Salem Generating Station circulating water system trash bars. One outcome of this Consultation was a Biological Opinion issued by the NMFS on January 2, 1991. This document includes an Incidental Take Statement which outlines specific measures the NMFS feels PSE&G should take to facilitate observance and rescue of impinged sea turtles. The Biological Opinion also includes a list of suggested Conservation Recommendations.

On April 11, 1991 the NRC issued a letter to Mr. Miltenberger requesting PSE&G implement the above mentioned changes to the Salem and Hope Creek Environmental Protection Plans. The proposed changes are to reference the Incidental Take Statement and the Conservation Recommendations found in the Biological Opinion issued by the NMFS.

The modified version of Section 4.2.1, will incorporate the above mentioned changes into Appendix B, Environmental Protection Plan for Hope Creek Generating Station.

Significant Hazards Consideration

PSE&G has evaluated the hazards consideration involved with the proposed amendment, focusing on the three standards set forth in 10CFR50.92(c) as quoted below:

"The commission may make a final determination, pursuant to the procedures in paragraph 50.91, that a proposed amendment to an operating license for a facility licensed under paragraph 50.21(b) or paragraph 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) involve a significant reduction in a margin of safety."

The following evaluation is provided for the significant hazards consideration standards.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. This change only extends the monitoring period, enhances and documents monitoring and reporting activities, and educates the monitoring personnel in sea turtle identification and resuscitation procedures.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes do not make any physical changes to the plant or changes in parameters governing normal plant operation. Therefore, the changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the change involve a significant reduction in a margin of safety?

The proposed changes involve increased monitoring, documentation and administrative procedures and do not degrade the existing margin of safety. Therefore, these changes do not involve a significant reduction in the margin of safety.

Conclusion

Based on the above safety evaluation, PSE&G concludes that the activities associated with this license amendment request satisfy the significant hazards consideration standards of 10CFR50.92(c). Accordingly, a no significant hazard consideration finding is justified.

ATTACHMENT 2

PROPOSED CHANGES TO THE ENVIRONMENTAL PROTECTION PLAN, APPENDIX B OF THE HOPE CREEK GENERATING STATION LICENSE

4.0 Environmental Monitoring

4.2.1 Aquatic Monitoring

The certifications and permits required under the Clean Water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decisions made by the State of New Jersey under the authority of the Clean Water Act and, in the case of sea turtles and shortnose sturgeon, decisions made by the National Marine Fisheries Service (NMFS) under the authority of the Endangered Species Act for any requirements pertaining to aquatic monitoring.

In accordance with Section 7 (a) of the Endangered Species Act, on January 2, 1991, the NMFS issued a Section 7 Consultation Biological Opinion related to the operation of Hope Creek Generating Station. This Section 7 Consultation entitled, "Reinitiation of a consultation in accordance with Section 7 (a) of the Endangered Species Act regarding continued operation of the Salem and Hope Creek Nuclear Generating Stations on the eastern shore of the Delaware River in New Jersey," concluded that "...continued operation is not likely to jeopardize the continued existence of listed species."

In accordance with Attachment 1, Incidental Take Statement, to this Biological Opinion, and all subsequent amendments as may be approved by the National Marine Fisheries Service, PSE&G shall:

- (1) Inspect the Hope Creek Generating Station service water intake trash bars once per day and clean as necessary from June 1 through September 30.
- (2) Make use of dip nets and other equipment whenever possible to remove smaller sea turtles from intake water trash racks to reduce trauma caused by the existing cleaning mechanism.
- (3) Implement the sea turtle resuscitation procedures for comatose turtles described in Appendix I of the Section 7 Biological Opinion. These procedures and related materials shall be posted in appropriate areas.

- (4) The monitoring and reporting system established in 1981 and modified in Appendix II of the Section 7 Biological Opinion shall continue. These reports shall be sent to the NMFS, North East Region (NER) within 30 days of any incidental take. Notification and reporting to the NRC shall be in accordance with Section 4.1 of this plan.

Attachment 2, Conservation Recommendations, to this Biological Opinion suggests conservation recommendations for implementation by Hope Creek Generating Station. The Station shall implement these recommendations to the satisfaction of the National Marine Fisheries Service.

ATTACHMENT 2 (cont.)

JB / ~~RAS~~

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APPENDIX B

TO FACILITY OPERATING LICENSE NO. NPF-50
HOPE CREEK GENERATING STATION

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DOCKET NO. 50-354

ENVIRONMENTAL PROTECTION PLAN
(NONRADIOLOGICAL)

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. The following are examples: excessive bird impaction events; onsite plant or animal disease outbreaks; mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973; fish kills; increase in nuisance organisms or conditions; and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

SEE INSERT (ATTACHMENT 2)

The certifications and permits required under the Clean Water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decisions made by the State of New Jersey under the authority of the Clean Water Act for any requirements for aquatic monitoring.