

Public Service
Electric and Gas
Company

Joseph J. Hagan

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Vice President - Nuclear Operations

APR 18 1995

LR-N95041
LCR 95-01

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

Gentlemen:

**LICENSE AMENDMENT APPLICATION
REVISION OF RADIATION MONITOR CHANNEL
FUNCTIONAL TEST FREQUENCY
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 represent changes to Table 4.3.7.1-1 "Radiation Monitoring Instrumentation Surveillance Requirements." This submittal increases the channel functional test interval from monthly to quarterly for each instrument.

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.

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 \$79,000 per year at Hope Creek. Savings over the life of the plant are estimated to be \$2,500,000.

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 page affected by the proposed change is 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,

A handwritten signature in black ink, appearing to be "J. A. [unclear]", with a long horizontal stroke extending to the right.

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
Mail Stop 14E21
Rockville, MD 20852

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

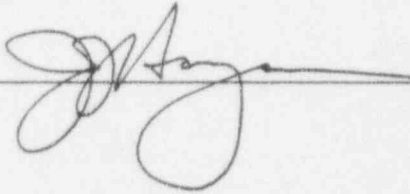
Mr. K. Tosch, Manager IV
NJ Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

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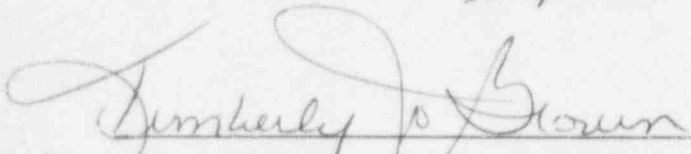
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

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 18th day of April, 1995


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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I. DESCRIPTION OF THE PROPOSED CHANGE

This amendment revises Table 4.3.7.1-1 "Radiation Monitoring Instrumentation Surveillance Requirements" by extending the channel functional test interval from monthly to quarterly for each instrument.

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 channel functional tests for radiation monitoring instrumentation.

III. JUSTIFICATION FOR CHANGE

The radiation monitoring instrumentation can be categorized as those monitoring effluents, those monitoring a specified area(s), and those associated with the reactor protection system and engineered safety features actuation systems. As with other instrumentation, radiation monitors are required to undergo channel checks, channel functional tests, and calibrations. In addition, a source check must also be performed. Such testing can result in a significant number of isolations (e.g., the control room, the fuel handling building, various process lines, etc.). Furthermore, the testing requires a significant allocation of plant personnel and results in a coinciding degradation of equipment.

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

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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 the channel functional test interval for the radiation monitors from monthly to quarterly. This recommendation was discussed further in NUREG-1366 "Improvements to Technical Specifications Surveillance Requirements," dated December 1992. The NRC found that while there is a large variation in the type and reliability of the radiation monitoring equipment among utilities most failures of these monitors can be identified by channel checks, source checks, or alarms. The NRC also concluded that the added operability indication provided by the channel functional tests does not seem to warrant the large allocation of plant resources required for the monthly surveillances. An additional consideration was the fact that various other radiation monitors (e.g., the reactor building exhaust radiation monitor and the main steam line radiation monitor) already have a quarterly channel functional test requirement.

Based upon these findings, the NRC concluded that the interval for channel functional testing of the radiation monitors could be extended without reducing safety while decreasing equipment degradation and removing unnecessary burdens on personnel resources. In light of the NRC's position on this matter 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 the radiation monitor channel functional 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. Increasing the

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interval between channel functional tests for the radiation monitoring 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.

The proposed change is procedural in nature concerning the channel functional test frequency for the radiation monitoring instrumentation not already on a quarterly surveillance. The channel functional test methodology for these instruments remains 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 change is in accordance with recommendations provided by the NRC regarding the improvement of Technical Specifications. These changes will result in 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.