

Public Service
Electric and Gas
Company

Stanley LaBruna

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-4800

Vice President - Nuclear Operations

NLR-N91147

OCT 17 1991

Reference: LCR 91-03

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

REQUEST FOR AMENDMENT
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) hereby transmits an application to amend Appendix A of Facility Operating License No. NPF-57 in accordance with 10CFR50.90. This amendment request would revise the accident monitoring instrumentation section in the Hope Creek Generating station (HCGS) Technical Specifications.

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 marked-up in Attachment 2.

Pursuant to the requirements of 10CFR50.91(b)(1), PSE&G has provided a copy of this amendment request to the State of New Jersey.

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

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

Sincerely,



Attachments
Affidavit

C Mr. T. T. Martin, Administrator
USNRC Region I

Mr. S. Dembek
USNRC Licensing Project Manager

Mr. T. P. Johnson
USNRC Senior Resident Inspector

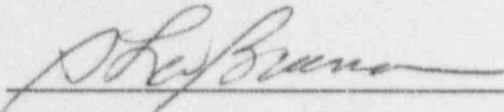
Mr. K. Tosch, Chief,
Bureau of Nuclear Engineering
New Jersey Department of Environmental Protection

REF: NLK-N91147

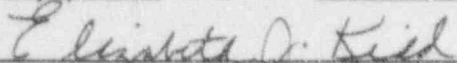
STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

Stanley LaBruna, 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 OCT 17 1991, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 17 day of October, 1991



Notary Public of New Jersey

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

My Commission expires on _____

ATTACHMENT 1

PROPOSED TECHNICAL SPECIFICATIONS AND BASES CHANGE

PROPOSED CHANGE TO THE TECHNICAL SPECIFICATIONS
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

ref: LCR 91-03

I. DESCRIPTION OF THE CHANGE

As shown on the marked-up Technical Specifications (TS) pages in Attachment 2, PSE&G requests that Table 3.3.7.5-1, Accident Monitoring Instrumentation, be revised to reduce the MINIMUM CHANNELS OPERABLE requirement of Suppression Pool Water Temperature Instruments from two (2) to one (1), and to remove ACTION 80 for that instrumentation, leaving the (a) notation and associated footnote. The change would also modify the (a) footnote to state that "Suppression chamber water temperature instrumentation must satisfy the availability requirements of Specification 3.6.2.1, ACTION c. and d." And, finally, footnote (c), which was a one-time-only change, is outdated and should be removed.

II. REASON FOR THE CHANGE

The proposed changes will make the Hope Creek Generating Station (HCGS) TS requirement for this instrumentation agree with the associated instrumentation requirement of HCGS TS 3.6.2.1, Suppression Chamber, ACTIONS c and d, with the GE Standard TS and with the criteria of Regulatory Guide 1.97.

III. JUSTIFICATION FOR THE CHANGE

The Suppression Chamber Water Temperature instrumentation consists of two channels of eight temperature detectors each (plus installed spares) which are averaged electronically to provide two average bulk water temperatures. These can be read at several locations in, and outside of, the control room. In the event that one channel's averaging circuit becomes inoperable, the outputs of each of the temperature detectors in that channel can be read and averaged manually and then compared to the remaining OPERABLE channel in the control room and/or to Remote Shutdown Panel indication of suppression chamber water temperature.

The existing HCGS TS Table 3.3.7.5-1 shows the REQUIRED CHANNELS OPERABLE and the MINIMUM CHANNELS OPERABLE as the same number, two. Therefore one channel's inoperability immediately places the station in the ACTION for one channel less than the MINIMUM CHANNELS OPERABLE. This error bypasses the ACTION that would permit 7 days to restore a single inoperable channel of suppression pool temperature monitoring instrumentation to OPERABLE status. This specification is in direct contradiction to HCGS TS 3.6.2.1, ACTION c.

III. JUSTIFICATION FOR THE CHANGE - Continued

The current TS Table 3.3.7.5-1 is not in agreement with either the GE Standard TS or Regulatory Guide 1.97, Section 1.3.2.c. Reg. Guide 1.97, Table 1 lists suppression pool temperature instruments as Category 2 and Section 1.3.2.c of that guide states (for Category 2 criteria) that "The out of service interval should be based on normal Technical Specifications for out of service for the system it serves where applicable or where specified by other requirements". Footnote (a) of TS Table 3.3.7.5-1 specifies that "Suppression chamber water temperature instrumentation must satisfy the availability requirements of TS 3.6.2.1." and TS 3.6.2.1 ACTION c (the TS for the system served by the subject instruments) requires that "With one suppression pool temperature monitoring channel inoperable, restore the inoperable channel(s) to OPERABLE status within 7 days or verify suppression pool temperature to be within the limits at least once per 12 hours." TS 3.6.2.1 ACTION d. permits 8 hours to restore at least one channel of suppression chamber water temperature indication when both channels are inoperable.

Additionally, TS 3.6.2.1. ACTION d (8 hours for restoration) is in conflict with the TS Table 3.3.7.5-1 ACTION 80 requirement of restoration within 48 hours. The requested change will bring the Accident Monitoring Instrumentation TS Table 3.3.7.5-1 into agreement with HCGS TS 3.6.2.1, ACTIONS c and d.

IV. 10CFR50.92 SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

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:

1. The operation of Hope Creek Generating Station (HCGS) in accordance with the proposed change will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment does not involve a physical or procedural change to any structure, component or system that significantly affects the probability or consequences of any accident or malfunction of equipment important to safety previously evaluated in the Updated Final Safety Analysis Report (UFSAR). The proposed change will, in agreement with the GE Standard TS and HCGS TS 3.6.2.1, ACTION c., provide a reasonable period of time in which to restore the inoperable channel to OPERABLE status while continuing to monitor average bulk temperature. This proposed revision will not affect the probability of the occurrence of any accident and, since this proposed revision will not significantly degrade suppression pool temperature monitoring capabilities, there is no increase in the consequences of any accident or malfunction of equipment important to safety previously evaluated.

2. The operation of Hope Creek Generating Station (HCGS) in accordance with the proposed change will not create the possibility of a new or different kind of accident from any previously evaluated.

There are no physical changes to the plant or to the manner in which the plant is operated involved in the proposed revision. Therefore, no new or different accident is created by the proposed change.

3. The operation of Hope Creek Generating Station (HCGS) in accordance with the proposed change does not involve a significant reduction in a margin of safety.

The proposed revision will, by making all affected TS agree, clarify the specifications for the plant operators. Since alternate methods are available to determine suppression pool temperature and are permitted by TS 3.6.2.1, ACTION c, with one average bulk temperature channel inoperable, this change can be made with no significant resultant change in any margin of safety.

Conclusion:

Based upon the above, we have determined that this proposed change does not involve a Significant Hazards Consideration.