

Public Service  
Electric and Gas  
Company

Stanley LaBruna

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Vice President - Nuclear Operations

OCT 17 1991  
NLR-N91143

Reference: LCR 91-10

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 Explosive Gas Mixture and the Radioactive Gaseous and Liquid Effluent Monitoring Instrumentation sections 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 administrative activities.

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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

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.

*Stanley LaBruna*

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

*Elizabeth J. Kidd*  
Notary Public of New Jersey

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

My Commission expires on \_\_\_\_\_

Ref: LCR 91-10

ATTACHMENT 3

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 91-10

I. DESCRIPTION OF THE CHANGE

As shown on the marked-up Technical Specifications (TS) pages in Attachment 2, PSE&G requests that TS 3.11.2.6, ACTION b, be revised to agree with the corresponding ACTION b of TS 3.3.7.11 and ACTION 124 of Table 3.3.7.11-1.

II. REASON FOR THE CHANGE

The current TS involved in this request are in disagreement with each other and require clarification. With Effluent monitoring instrumentation inoperable, ACTION b of specification 3.3.7.11 and ACTION 124 of Table 3.3.7.11-1, as well as several other TS sections that contain similar grab sampling provisions, permit continued discharge via the affected pathway provided that grab samples are obtained and analyzed on a specific frequency. In those TS, if inoperable monitoring equipment that is being compensated for by grab sampling is not restored to OPERABLE status within 30 days, an explanation is required in the next Semi-annual Radiological Effluent Release Report; however, the discharges are not restricted to 30 days. Currently, with the same effluent monitors as in TS table 3.3.7.11-1 inoperable, Section 3.11.2.6, ACTION b, permits continued use of the main condenser off-gas treatment system for only 30 days and has no reporting requirement.

III. JUSTIFICATION FOR THE CHANGE

ACTION 124 of Table 3.3.7.11-1 and other TS requirements that contained similar grab sampling provisions were originally written in a manner resembling the current TS 3.11.2.6, ACTION b to agree with the NRC staff's original model Radiological Environmental Technical Specifications (RETS) guidance, NUREG 0473. However, in accordance with a subsequent revision to the NUREG 0473 guidance, the HCGS Facility Operating License was modified, in Amendment 2, to read as it now exists in all but TS 3.11.2.6, ACTION b. This one specification was overlooked when the change in wording was requested by PSE&G. As described in the NRC's Safety Evaluation supporting that amendment, the proposed wording is consistent with the intent of, and follows closely the staff's revised RETS guidance provided in NUREG 0473, Revision 2. Since an alternate method is available to assess the measured parameter when the primary method is unavailable, the intent of the TS is satisfied. This change will eliminate conflicting requirements for the same equipment and make all similar TS sampling requirements consistent.



## 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:

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 bring the affected TS into agreement with other similar specifications and is essentially administrative in nature.

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.

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.

This change is administrative in nature. The proposed wording change was previously reviewed and approved by the NRC staff in Amendment 2 to the FOL. As described in the Safety Evaluation supporting that amendment, the proposed wording is consistent with the intent of, and follows closely the staff's revised Radiological Environmental Technical Specifications (RETS) guidance provided in NUREG 0473, Revision 2. We, therefore, have determined that there is no significant reduction in any margin of safety involved in this change.

### Conclusion:

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