

Public Service
Electric and Gas
Company

Stanley LaBruna

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Vice President - Nuclear Operations

JUN 04 1992
NLR-N91166
LCR 91-13

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

Gentlemen:

LICENSE AMENDMENT APPLICATION
UNIT STAFF LICENSE REQUIREMENTS
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) hereby submits a request for amendment of Facility Operating License NPF-57 for the Hope Creek Generating Station in accordance with 10 CFR 50.90. A copy of this submittal has been sent to the state of New Jersey as indicated below pursuant to the requirements of 10 CFR 50.91(b)(1).

Technical Specifications currently require the Operations Manager to hold a senior reactor operator (SRO) license. The proposed change would require the Operations Manager to either hold a SRO license or to have held a SRO license on a similar unit (BWR).

Attachment 1 includes a description, justification and significant hazards analysis for the proposed change.

Attachment 2 contains marked up Technical Specification (TS) pages which reflect the proposed change. Please note that the pages affected by this change request are also affected by Hope Creek LCR 89-15 submitted on January 24, 1990 and which is currently under NRC review. Although the changes requested by these two submittals are different and independent, they affect some of the same TS items. Therefore, if LCR 89-15 is approved while this amendment request is under review, the format and location of the changes contained in Attachment 2 will be affected. In this event, PSE&G will submit a revision to this submittal.

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JUN 04 1992

PSE&G believes that this submittal contains sufficient technical justification to conclude that a detailed specialist review should not be required and that the proposed change can be classified as a Category 2 change.

Upon NRC approval, please issue a License Amendment which will be effective upon issuance and shall be implemented within 60 days of issuance.

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

Sincerely,



Affidavit
Attachments (2)

C Mr. S. Dembek
Licensing Project Manager

Mr. T. Johnson
Senior Resident Inspector

Mr. W. T. Russell
Administrator - Region I

Mr. Kent Tosch,
Chief -New Jersey 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)
)
COUNTY OF SALEM) SS.

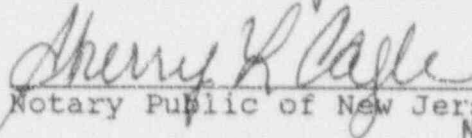
S. LaBruna, being duly sworn according to law deposes and says:

I am Vice President - Nuclear Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth on our letter dated JUN 04 1992, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 4th day of June, ~~1991~~ 1992

Letter prepared for review
and approval in 1991 -
final approval obtained in 1992



Notary Public of New Jersey **SHERRY L. CAGLE**
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires March 5, 1997

My Commission expires on _____

ATTACHMENT 1

REQUEST FOR LICENSE AMENDMENT
UNIT STAFF LICENSE REQUIREMENTS
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I. Description of the Proposed Changes

This amendment request proposes the following:

1. Specification 6.2.2.f is revised to delete the Operations Manager as a position requiring a SRO license.
2. A new Specification 6.2.2.g is added to delineate the requirements for the Operations Manager position.
3. Specification 6.3.1 is revised and a new Specification 6.3.2 is added to delineate the requirements for the Operations Manager position.

II. Reason for the Proposed Changes

In order to maintain a SRO license as currently required, the Operations Manager (OM) must attend requalification training for four two-week segments each year. During the time that the OM is in training, that individual is displaced from the position's managerial activities and the Operating Engineer (OE) must fulfill the responsibilities of both positions. This creates additional burden for both individuals.

The deletion of the requirement for the OM to hold a SRO license will enhance both the OM's and OE's ability to effectively carry out their primary responsibilities and will improve the consistency and continuity of managerial oversight for the Operations Department. PSE&G believes that this change will have an overall positive impact on the safe and efficient operation of the Hope Creek Generating Station.

III. Justification for the Proposed Changes

The Operations Department at Hope Creek Generating Station is managed through the Operations Manager (OM), Operating Engineer (OE) and the on-shift supervision consisting of the Senior Nuclear Shift Supervisor (SNSS) and Nuclear Shift Supervisor (NSS). Technical Specifications currently require all of these positions to hold a SRO license. This requirement is in accordance with ANSI/ANS-3.1-1981, "Selection, Qualification and Training of Personnel for Nuclear Power Plants".

Current industry guidance provided by ANSI/ANS-3.1-1987 allows relaxation of the SRO license requirement for the OM position, provided certain conditions are met. This allows greater management flexibility while maintaining the high standards necessary to ensure safe and efficient operation of a nuclear power plant. PSE&G supports this philosophy and is therefore submitting this amendment request.

The proposed change would require the Operations Manager to either hold a SRO license or to have held a SRO license on a similar (BWR) unit. These special requirements ensure that a selected candidate has demonstrated knowledge at the SRO level, although he/she may not hold a current SRO license. Insofar as the OE is required to hold a SRO license, senior licensed personnel on shift will continue to be directly managed by a SRO licensed individual.

Based on the specific knowledge requirements to fulfill the OM position, and the requirement for the OE to hold a SRO license, PSE&G believes that the issuance of this amendment request will not adversely impact plant safety.

IV. Significant Hazards Consideration Evaluation

PSE&G has, pursuant to 10 CFR 50.92, reviewed the proposed amendment to determine whether our 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.

An individual selected to fill the OM position will have met current industry guidance on the selection, qualification and training of personnel for nuclear power plants in accordance with ANSI/ANS-3.1-1987 and as specified in Technical Specifications.

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

The deletion of the requirement for the OM to hold a SRO license, unlike a procedure or design change, does not constitute a potential new accident precursor.

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

Operations Department personnel will continue to be directly managed by a SRO licensed individual.

Candidates who are not currently holding SRO licenses and who are selected for the OM position must meet the education, experience and training requirements of ANSI N18.1-1971 and the special requirements delineated in Technical Specifications.

Additionally, this change is expected to have an overall positive impact on safety by enhancing both the OM's and OE's ability to effectively carry out their primary responsibilities and by improving the consistency and continuity of managerial oversight for the Operations Department.

V. Conclusion

Based on the preceding discussion, PSE&G has concluded that the proposed change to the Technical Specifications does not involve a significant hazards consideration insofar as the change: (i) does not involve a significant increase in the probability or consequences of an accident previously evaluated, (ii) does not create the possibility of a new or different kind of accident from any accident previously evaluated, and (iii) does not involve a significant reduction in a margin of safety.

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ATTACHMENT 2

REQUEST FOR LICENSE AMENDMENT
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