

during the extended AOT and based on the following discussion of minimum ECCS [Emergency Core Cooling System]/decay heat removal requirements.

The reduction in the margin of safety is not significant since the remaining operable ECCS equipment is adequate to mitigate the consequences of any accident. This conclusion is based on the information contained in the UFSAR [Updated Final SAR] reference documents NEDO-24708A and NEDC-30936-A. These documents describe the minimum requirements to successfully terminate a transient or LOCA initiating event (with scram), assuming multiple failures with realistic conditions were used to justify certain TS AOTs per UFSAR sections 6.3.1.1.2.o and 6.3.3.1. The minimum requirements for short term response to an accident would be either one LPCI pump or one Core Spray loop in conjunction with ADS [Automatic Depressurization System], which would be adequate to re-flood the vessel and maintain core cooling sufficient to preclude fuel damage. For long term response, the minimum requirements would be one loop of RHR for decay heat removal, along with another low pressure ECCS loop. These minimum requirements will be met since implementation of the proposed TS changes will require the operability of HPCI [High Pressure Coolant Injection], ADS, two LPCI subsystems (or one LPCI subsystem and one RHR subsystem during decay heat removal) and one Core Spray subsystem be maintained during the 14 day period. A Special Procedure will be written to ensure the operability of specified components and that other appropriate compensatory measures are implemented.

Compensatory measures will be taken prior to or during the proposed extended AOT for those fire regions that rely on one or more safe shutdown methods which would all be unable to safely shutdown the plant with inoperable loops of the ESW and RHRSW systems or the inoperable systems that ESW or RHRSW support. These compensatory measures will offset the increased risk of a fire event occurring in the vulnerable areas, during the fourteen day versus three day AOT period. Therefore, the proposed extended AOT does not adversely affect the approved level of fire protection as described in UFSAR Appendix 9A (Fire Protection Evaluation Report).

A Special Procedure will be written to administratively control the requirement to maintain the operability of specified components and implementation of any appropriate compensatory measures which are deemed necessary during the proposed AOT. In addition, operations personnel are fully qualified by normal periodic training to respond to and mitigate a Design Basis Accident, including the actions needed to ensure decay heat removal while LGS Unit 1 and Unit 2 are in the operational configurations described within this submittal. Accordingly, procedures are already in place that cover safe plant shutdown and decay heat removal for situations applicable to those in the proposed AOTs.

A Probabilistic Safety Assessment (PSA) Study was performed for an ESW and

RHRSW loop being out-of-service for 14 days on an operating unit. The Core Damage Frequency (CDF) increased by 3.14×10^{-6} , from 5.11×10^{-6} /reactor-year to 8.25×10^{-6} /reactor-year. In absolute terms, this is not a significant increase in risk. In addition, the modifications to be installed during this proposed extended AOT will allow for future maintenance and inspections to be performed on the ESW and RHRSW loops without removing an entire loop from service, which will reduce risk in the future. For example, if the ESW loop unavailability, due to testing or maintenance, is reduced by half, the CDF will decrease by more than four percent. It will also minimize the potential need for future AOT extensions on these systems.

Therefore, the implementation of the proposed one-time TS changes will not involve a significant reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room
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NRC Project Director: John F. Stolz

Public Service Electric & Gas Company, Docket No. 50-354, Hope Creek Generating Station, Salem County, New Jersey

Date of amendment request:
September 29, 1994

Description of amendment request:
The proposed Technical Specification changes represent revisions to Sections 3/4.3.7.2 "Seismic Monitoring Instrumentation" and 3/4.3.7.3 "Meteorological Instrumentation." The proposed revisions remove the requirements from the Technical Specifications and relocates the appropriate descriptive information and testing requirements to the Hope Creek Updated Final Safety Analysis Report (UFSAR).

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes involve no hardware changes, no changes to the

operation of any systems or components, and no changes to existing structures. Neither the relocation of the seismic/meteorological specifications to the UFSAR nor the elimination of the Special Report requirements represent changes that affect plant safety or alter existing accident analyses.

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

The proposed changes are procedural in nature concerning the operability and surveillance of instrumentation that are not safety related and will not impact the operation of any plant safety related component or equipment. Therefore, these changes will not create a new or unevaluated accident or operating condition.

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

In accordance with the guidance provided by the NRC regarding the improvement of Technical Specifications, SECY-93-067, the proposed changes relocate the seismic and meteorological instrumentation portions of the Technical Specifications, with the exception of the Special Report requirements, to the UFSAR. These instruments are not safety related and do not have any associated safety margins which could be affected by this change.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

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Public Service Electric & Gas Company, Docket No. 50-354, Hope Creek Generating Station, Salem County, New Jersey

Date of amendment request:
November 23, 1994

Description of amendment request:
The proposed changes to the Technical Specifications (TSs) would revise TS 4.8.2.1, "Electrical Power Systems D. C. Sources, Surveillance Requirements," and associated Bases Section B 3/4.8.2. The proposed changes would (1) increase the terminal voltage acceptance criteria for the battery discharge test from 106 to 108 VDC, (2) delete a "one time only" test that is no longer applicable, (3) delete the battery load profile from the TS, and (4) revise TS Table 4.8.2.1-1, "Battery Surveillance Requirements," to agree more closely