

Public Service
Electric and Gas
Company

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Vice President - Nuclear Operations

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United States Nuclear Regulatory Commission
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Gentlemen:

REQUEST FOR REGIONAL WAIVER OF COMPLIANCE
TECHNICAL SPECIFICATIONS 4.8.1.1.2.f.2 AND 4.0.3
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) hereby requests Regional Waiver of Compliance from the provisions of Technical Specification 4.8.1.1.2.f.2 AND 4.0.3. As discussed in Attachment 1 to this letter, PSE&G's conclusion is that granting this request would involve neither a significant hazards consideration nor any irreversible environmental consequences.

This relief is requested to allow sufficient time to perform Surveillance Requirement 4.8.1.1.2.f.2 without requiring unit shutdown. The surveillance test requires that the impurity level of diesel fuel oil samples meet the criteria of ASTM-D2274-70. At 1630 hours on August 23, 1990, PSE&G personnel determined that this surveillance had not been properly performed for fuel oil samples.

The requested duration of this waiver is from approval prior to 1630 hours on August 24, 1990 until 1630 hours, on August 26, 1990. Regional Waiver of Compliance is being requested because Technical Specifications 4.8.1.1.2.f.2, 4.0.3 and 3.0.3 would require actions to initiate unit shutdown by 1630 hours on August 24, 1990. PSE&G therefore requests expeditious review of this submittal.

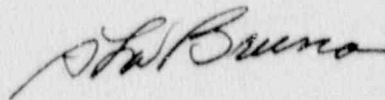
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This request has been reviewed and recommended for approval by the Hope Creek Generating Station Station Operations Review Committee.

Sincerely,



Attachment

C Mr. C. Y. Shiraki
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
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TECHNICAL SPECIFICATIONS 3/4.8.1.1, 4.0.3 AND 3.0.3

Hope Creek Technical Specification 3/4.8.1.1 requires that four separate and independent diesel generators be Operable in Operational Conditions 1, 2 and 3. Surveillance Requirement 4.8.1.1.2.f.2 requires that, within one week of obtaining a diesel fuel oil sample, an impurity level of less than 2 mg of insoluble per 100 ml, when tested in accordance with ASTM-D2274-70, be verified. Fuel oil samples are required to be taken at least once per 92 days and upon receipt of new fuel.

Technical Specification 4.0.3 states that "Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that the Surveillance Requirement has not been performed. The ACTION requirements may be delayed up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours..."

Technical Specification 3.0.3 requires that "When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in an OPERATIONAL CONDITION in which the specification does not apply ..."

SUMMARY OF CURRENT SITUATION

On August 23, 1990, Hope Creek Generating Station (HCGS) personnel received test results from a vendor who had performed an analysis of new diesel fuel oil samples. PSE&G contacted the vendor to discuss the test results of a particular sample which apparently did not meet the test criteria. The ensuing discussions led the PSE&G personnel to discover that the testing did not meet the criteria of ASTM-D2274-70, but were, in fact, performed to ASTM D2276. Therefore, Surveillance Requirement 4.8.1.1.2.f.2 had not been performed. Additionally, since it appears that the testing laboratory has tested previous fuel oil samples incorrectly with regard to meeting the criteria of the subject ASTM standard, the OPERABILITY of all emergency diesel fuel storage, hence all four Emergency Diesel Generators (EDGs), is in question. Consequently, the 24 hour provision of Technical Specification 4.0.3 was placed into effect upon discovery of the improperly performed surveillance (i.e., at 1630 hours on August 23, 1990).

Due to the specific testing requirements, particularly a 16 hour sample aging step, the number of samples to be tested, and the limitations of individual laboratories to perform multiple tests in parallel, the ASTM-D2274-70 test cannot be performed for all of the EDG fuel storage tanks within the 24 hours allowed by Specification 4.0.3. Technical Specification 4.8.1.1.2.f.2 normally allows one week from the time the sample is taken until completion of the test.

Therefore, unless the requested waiver is granted, the failure to properly perform Surveillance Requirement 4.8.1.1.2.f.2 will result in entry to Technical Specification 3.0.3 as a result of declaring all four Emergency Diesel Generators inoperable.

This situation could not be reasonably avoided because PSE&G had no reason to question the laboratory testing results wherein the discovery would have been made that the lab was not doing the correct testing specified by PSE&G, and because the provisions of Specification 4.0.3 became effective immediately upon discovery of the incorrect performance of the surveillance, not allowing sufficient time to successfully complete the tests.

REQUEST FOR REGIONAL WAIVER OF COMPLIANCE

PSE&G hereby requests a waiver of compliance for the requirements of Hope Creek Generating Station Technical Specifications 4.8.1.1.2.f.2 and 4.0.3. Specifically, it is requested that the allowable time period to perform the required surveillances be extended an additional 48 hours on a one-time-only basis.

COMPENSATORY MEASURES

Lacking ASTM D2276 test results for "D" EDG, it will be declared administratively INOPERABLE until test results are received that permit us to reverse that decision.

JUSTIFICATION FOR THE PROPOSED WAIVER OF COMPLIANCE

Justification for Proposed Time Duration of the Request

The time necessary for completion of the required ASTM testing is greater than the 24 hours permitted by Technical Specifications. An additional 48 hours will be sufficient time to complete the testing for all affected fuel storage tanks. The normal interval permitted for the subject ASTM testing is one week after a sample is obtained. The required oil samples have been taken and distributed to two laboratories for ASTM D2274 analysis to expedite receipt of the results. The first testing results have returned for one of two "A" EDG Storage Tanks well within the Technical Specification limit. Additionally, testing in

accordance with ASTM D2276 has been performed on all tanks. Due to the delays associated with the ASTM D2274 testing, the results from the ASTM D2276 testing for each tank have been correlated against the ASTM D2274 data received on the "A" EDG tank to project ASTM D2274 results for the remaining tanks. The results of this correlation of test results projects that the ASTM D2274 tests for the A, B, and C EDGs will satisfy the Technical Specification limit. Lacking even ASTM D2276 test results for the two "D" EDG Storage Tanks, we have decided to declare that EDG administratively INOPERABLE until test results can be obtained to reverse that decision. The results for the remaining diesel generators, in conjunction with satisfactory "clear and bright" tests for all tanks which were performed on August 23, 1990, provide a level of confidence that the ongoing ASTM D2274-70 tests will demonstrate that Emergency Diesel Generator fuel oil meets the acceptance standards of the Technical Specifications.

As described in the following sections, there is no significant hazard to the public nor are there any irreversible environmental consequences introduced by granting the requested time extension for completion of the required testing. Absent the requested relief, a plant shutdown will be required.

Determination of No Significant Hazards Consideration

This proposed Waiver of Compliance:

- 1) Does not involve a significant increase in the probability or consequences of any accident previously evaluated.

All four Emergency Diesel Generators have been demonstrated OPERABLE by recent and current successful completion of all other surveillance testing. With the exception of the specific incorrectly performed ASTM test, the fuel oil has been tested to, and satisfied, all other ASTM criteria required by the Technical Specifications.

Hope Creek has sent oil samples out to have the proper testing performed and the results from the first sample have returned with a value of .4858 mg per 100 ml...a factor of 5 below the Technical Specification (TS) limit. Fuel oil used at HCGS is all purchased from the same supplier...providing a level of confidence that the remaining samples will also be satisfactory.

The EDGs have duplex filters and duplex strainers on the fuel oil supply lines which will prevent fuel oil contaminants from degrading the injector nozzles. The strainers and filters are instrumented and alarm on high d/p in sufficient time to permit manual transfer. Therefore, the diesels can be reasonably expected to remain operable even with fuel oil contamination.

The above all provide reasonable assurance that the EDGs will remain capable of performing their intended function when called upon. There are no other plant components directly affected by the quality of the fuel oil. Therefore, permitting an additional 48 hours in which to complete the required ASTM testing will cause no significant increase in the probability or consequences of any accident or malfunction of equipment important to safety previously evaluated.

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

An additional 48 hour delay in completing the ASTM testing that was improperly performed will not create any new or different kind of accident.

- 3) Does not involve a significant reduction in a margin of safety.

The type and quantity of testing performed, the results of the first samples tested to the proper ASTM standard, the correlation of test data and the design of the fuel delivery system provide reasonable assurance that the EDGs will remain capable of performing their intended function. Thus, permitting an additional 48 hours in which to complete the prescribed ASTM testing will cause no significant reduction in the margins of safety associated with the operability of the EDGs as discussed in the bases for the Technical Specifications.

Determination that the Request does not Involve Irreversible Environmental Consequences

The requested waiver does not allow for any increase in effluents that may be released offsite, does not involve an increase in radiation exposure to personnel, and does not involve a Determination of No Significant Hazards Consideration.

Therefore, the request does not involve any irreversible environmental consequences.