

10 CFR 50.90

LR-N08-0102 LCR H05-01, Rev. 1 May 02, 2008

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, DC 20555-0001

> Hope Creek Generating Station Facility Operating License No. NPF-57 NRC Docket No. 50-354

Subject: Supplement to License Amendment Request for Extended Power Uprate

Reference: 1) Letter from George P. Barnes (PSEG Nuclear LLC) to USNRC, September 18, 2006

In Reference 1, PSEG Nuclear LLC (PSEG) requested an amendment to Facility Operating License NPF-57 and the Technical Specifications (TS) for the Hope Creek Generating Station to increase the maximum authorized power level to 3840 megawatts thermal (MWt).

Reference 1 proposed a new License Condition to allow leak rate tests required by Surveillance Requirement (SR) 4.6.1.2.a to be considered to be performed per SR 4.0.1, upon implementation of the license amendment approving the proposed extended power uprate, until the next scheduled performance.

The attachment to this letter modifies the proposed License Condition to also include hydrostatic leak rate testing required by SR 4.6.1.2.h.

PSEG has determined that the information contained in this letter and attachment does not alter the conclusions reached in the 10CFR50.92 no significant hazards analysis previously submitted.

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There are no regulatory commitments contained within this letter.

Should you have any questions regarding this submittal, please contact Mr. Paul Duke at 856-339-1466.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 2, 2008

Sincerely,

and ricrai

George P. Barnes Site Vice President Hope Creek Generating Station

Attachment: Supplement to Request for License Amendment

cc: S. Collins, Regional Administrator – NRC Region I J. Lamb, Project Manager - USNRC NRC Senior Resident Inspector - Hope Creek P. Mulligan, Manager IV, NJBNE

# **ATTACHMENT 1**

### Hope Creek Generating Station

## Facility Operating License NPF-57 Docket No. 50-354

### Extended Power Uprate

#### Supplement to License Amendment Request

In Reference 1, PSEG Nuclear LLC (PSEG) requested an amendment to Facility Operating License NPF-57 and the Technical Specifications (TS) for the Hope Creek Generating Station (HCGS) to increase the maximum authorized power level to 3840 megawatts thermal (MWt).

Reference 1 proposed a new License Condition to allow leak rate tests required by Surveillance Requirement (SR) 4.6.1.2.a to be considered to be performed per SR 4.0.1, upon implementation of the license amendment approving the proposed extended power uprate (EPU), until the next scheduled performance.

This attachment modifies the proposed License Condition to also include hydrostatic leak rate testing required by SR 4.6.1.2.h.

#### Modified Proposed License Condition

Leak rate tests required by Surveillance Requirement 4.6.1.2.a and 4.6.1.2.h to be performed in accordance with the Primary Containment Leakage Rate Testing Program are not required to be performed until their next scheduled performance, which is due at the end of the first test interval that begins on the date the test was last performed prior to implementation of Amendment No. [XXX].

### Primary Containment Leakage Rate Testing Program

Surveillance Requirement 4.6.1.2.a requires that primary containment leakage rates be demonstrated in accordance with the Primary Containment Leakage Rate Testing Program. The testing program is required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J and is described in Technical Specification 6.8.4.f. Test intervals are established on a performance basis in accordance with 10 CFR 50 Appendix J, Option B. Surveillance Requirement 4.6.1.2.h requires that all containment isolation valves in hydrostatically tested lines which penetrate the primary containment be leak tested at least once per 18 months. The combined leakage rate is limited to less than or equal to 10 gpm when tested at 1.10 times Pa, the calculated peak containment pressure (Pa).

The Type A integrated leak rate test and the Type B and C local leak rate tests are performed at the calculated peak containment pressure (Pa). Pa increases to 50.6

psig for the EPU; and Technical Specification 6.8.4.f is being revised to reflect the change. The hydrostatic leak testing required by SR 4.6.1.2.h is performed at 1.10 times Pa. The required hydrostatic test pressure increases from 52.9 psig to 55.7 psig for the EPU. However, with substantial margin to the leakage rate acceptance limits based upon current leak rate test results, it is not necessary to reperform all of the leak rate tests at the higher pressures before implementation of the EPU.

The proposed License Condition would allow leak rate tests required by Surveillance Requirements 4.6.1.2.a and 4.6.1.2.h to be considered to be performed per SR 4.0.1, upon implementation of the license amendment approving the proposed EPU, until the next scheduled performance. This would preclude having to perform the affected leak rate tests before their next scheduled performance solely for the purpose of documenting compliance. The allowance provided in the proposed License Condition would not supercede that aspect of SR 4.0.1 that governs cases where it is believed that, if the SR were performed, it would not be met. Performance of the leak rate tests merely to document compliance would unnecessarily divert resources, interfere with plant operations, potentially incur additional personnel dose, and would not improve plant safety.

#### **Reference**

1) Letter from George P. Barnes (PSEG Nuclear LLC) to USNRC, September 18, 2006