June 2, 2000

MEMORANDUM TO: James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Project Manager, Section 2 ***/RA/***
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: HOPE CREEK GENERATING STATION, FACSIMILE TRANSMISSION, ISSUES TO BE DISCUSSED IN AN UPCOMING CONFERENCE CALL (TAC NO. MA7322)

The attached information was transmitted by facsimile on May 24, 2000, to Mr. James Priest of Public Service Electric & Gas Company (PSE&G). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's submittal dated November 24, 1999, which requested changes to the Hope Creek Generating Station Technical Specifications to establish charcoal filter testing requirements consistent with Generic Letter 99-02. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket No. 50-354

Attachment: Issues for Discussion in Upcoming Telephone Conference

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Issues for Discussion in Upcoming Telephone Conference
Related to PSE&G License Change Request H99-10, dated November 24, 1999
Hope Creek Generating Station
Charcoal Filter Testing Changes Required By Generic Letter 99-02

1. For all three systems, (1) Filtration Recirculation Ventilation System (FRVS) Ventilation, (2) Filtration Recirculation Ventilation System (FRVS) Recirculation, and (3) Control Room Emergency Filtration System (CREFS), please refer to or provide docketed information that states the residence times.

2. Since the residence times are directly related to the actual system face velocities, please provide clarification for the following statements:

   a) PSE&G Letter LR-N99474, dated November 24, 1999, Attachment 1, page 2 of 4, at the end of the third paragraph: "Since the Hope Creek CREF and FRVS design utilizes safety-related heaters for humidity control, the ASTM D3803-1989 testing will be conducted at 70 percent RH. In addition, system face velocities for CREF and FRVS will be below 110% of 40 ft/min."

   b) PSE&G Letter LR-N990466, dated November 24, 1999, Attachment 1, page 2 of 2, table for Hope Creek: For the CREF, FRVS-VENT and FRVS-RECIRC, it is stated for each system that the "Velocity" is 40 FPM.

   PART 1: Specifically, please indicate whether the two statements above are intended to state that the ASTM D3803-1989 test velocities for each system are 40 ft/min and that the actual system face velocities are less than 110% of 40 ft/min. Also, what is meant by the face velocities "**will** be below 110% of 40 ft/min?" Does the word "will" mean that something has changed or does it mean that it will be below 110% of 40 ft/min during an accident?

   PART 2: Please indicate how the actual system face velocities were determined. The actual system face velocities can be calculated by dividing the worst case design-basis accident flow rates (typically the maximum technical specification flow rates, nominal +10% upper value) by the total exposed surface area of the charcoal filter media. Per GL 99-02, if this value is >110% of 40 ft/min, then the technical specification (TS) should be revised to specify that value as the test face velocity. (The guidance on calculation of the residence times in ANSI N510-1975, Section 8.3.3, and ASME AG-1-1997, Division II, Sections FD and FE, Articles I-1000 can be used to calculate the actual system face velocities).

   PART 3: Please discuss any impact on the residence times provided in response to Question 1 above. The residence times should be consistent with the actual system face velocity. (face velocity = bed depth ÷ residence time)