June 16, 2000

Mr. Harold W. Keiser
Chief Nuclear Officer & President -
Nuclear Business Unit
Public Service Electric & Gas
Company
Post Office Box 236
Hancocks Bridge, NJ 08038

SUBJECT: HOPE CREEK GENERATING STATION, ISSUANCE OF AMENDMENT RE: RESIDUAL HEAT REMOVAL SYSTEM FLOW (TAC NO. MA7796)

Dear Mr. Keiser:

The Commission has issued the enclosed Amendment No. 128 to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated December 27, 1999, as supplemented April 11, 2000.

This amendment revises TSs 4.6.2.2.b, "Suppression Pool Spray," and 4.6.2.3.b, "Suppression Pool Cooling," to modify the acceptance criteria associated with flow rate testing of the Residual Heat Removal system pumps.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

***/RA/***

Richard B. Ennis, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosures:
1. Amendment No. 128 to License No. NPF-57
2. Safety Evaluation

cc w/encls: See next page

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Chief Nuclear Officer & President -
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PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-354

HOPE CREEK GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 128
License No. NPF-57

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment filed by the Public Service Electric & Gas Company (PSE&G) dated December 27, 1999, as supplemented April 11, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-57 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 128, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into the license. PSE&G shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance, and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

***/RA/***

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

Attachment: Changes to the Technical Specifications

Date of Issuance: June 16, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 128

FACILITY OPERATING LICENSE NO. NPF-57

DOCKET NO. 50-354

Replace the following pages of the Appendix "A" Technical Specifications with the attached revised pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change.

| Remove | Insert |
| --- | --- |
| 3/4 6-15 | 3/4 6-15 |
| 3/4 6-16 | 3/4 6-16 |
| B 3/4 6-4 | B 3/4 6-4 |
| B 3/4 6-4a | B 3/4 6-4a |

CONTAINMENT SYSTEMS

SUPPRESSION POOL SPRAY

LIMITING CONDITION FOR OPERATION

3.6.2.2 The suppression pool spray mode of the residual heat removal (RHR) system shall be OPERABLE with two independent loops, each loop consisting of:

a. One OPERABLE RHR pump, and

b. An OPERABLE flow path capable of recirculating water from the suppression chamber through an RHR heat exchanger and the suppression pool spray sparger.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

a. With one suppression pool spray loop inoperable, restore the inoperable loop to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With both suppression pool spray loops inoperable, restore at least one loop to OPERABLE status within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN* within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.2 The suppression pool spray mode of the RHR system shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve, manual, power operated or automatic, in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.

b. By verifying that each of the required RHR pumps develops a flow of at least 540 gpm on recirculation flow through the RHR heat exchanger (after consideration of flow through the closed bypass valve) and suppression pool spray sparger when tested pursuant to Specification 4.0.5.

*Whenever both RHR subsystems are inoperable, if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by use of alternate heat removal methods.

## SUPPRESSION POOL COOLING

### LIMITING CONDITION FOR OPERATION

3.6.2.3 The suppression pool cooling mode of the residual heat removal (RHR) system shall be OPERABLE with two independent loops, each loop consisting of:

a. One OPERABLE RHR pump, and

b. An OPERABLE flow path capable of recirculating water from the suppression chamber through an RHR heat exchanger.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

a. With one suppression pool cooling loop inoperable, restore the inoperable loop to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With both suppression pool cooling loops inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN* within the next 24 hours.

### SURVEILLANCE REQUIREMENTS

4.6.2.3 The suppression pool cooling mode of the RHR system shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve, manual, power operated or automatic, in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.

b. By verifying that each of the required RHR pumps develops a flow of at least 10,160 gpm on recirculation flow through the RHR heat exchanger (after consideration of flow through the closed bypass valve) and the suppression pool when tested pursuant to Specification 4.0.5.

*Whenever both RHR subsystems are inoperable, if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by use of alternate heat removal methods.

DEPRESSURIZATION SYSTEMS (Continued)

tested during the Humboldt Bay and Bodega Bay tests was 170°F and this is conservatively taken to be the limit for complete condensation of the reactor coolant, although condensation would occur for temperatures above 170°F.

Should it be necessary to make the suppression chamber inoperable, this shall only be done as specified in Specification 3.5.3.

The Hope Creek design contains a bypass line around each of the RHR heat exchangers. The line contains a valve that is used for adjusting flow through the heat exchanger. The valve is not designed to be a tight shut-off valve. With the bypass valve closed, a portion of the total flow travels through the bypass line, which can affect overall heat transfer, although no heat transfer performance requirement of the heat exchanger is intended by the Technical Specification RHR pump Surveillance Requirements.

One of the Surveillance Requirements for the Suppression Pool Cooling (SPC) and Suppression Pool Spray (SPS) modes of the RHR system demonstrate that each RHR pump develops the required flowrate while operating in the applicable mode with flow through the associated heat exchanger and its closed bypass valve. Verifying that each RHR pump develops the required flow rate, while operating in the applicable mode with flow through the heat exchanger (after consideration of flow through the closed bypass valve), ensures that pump performance has not degraded during the cycle. Flow is a normal test of centrifugal pump performance required by ASME Code, Section XI. This test confirms one point on the pump baseline curve and is indicative of overall performance. Such inservice inspections confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance.

To provide for consistent pump performance data, during the SPC surveillance test the RHR test return valve (HV-F024A(B)) is fully opened and an upper limit of 250 gpm for heat exchanger bypass valve leakage is established in the surveillance procedure acceptance criteria. By establishing a maximum 250 gpm leakage rate for the heat exchanger bypass valves and opening the test return valve fully, a constant system resistance is established for every pump test required by Surveillance Requirement 4.6.2.3.b. RHR pump degradation would then be more readily detectable if the total flow decreased between tests. In addition, instrument uncertainty is accounted for by applying a flow penalty of 160 gpm to the acceptance criteria in the SPC surveillance. Since the flow rate for this surveillance test is measured downstream of the combined RHR heat exchanger and heat exchanger bypass flow paths, the surveillance procedure acceptance criteria specifies a minimum RHR pump flow rate of 10,410 gpm. For SPS, the ability to provide the required flow is independent of the heat exchanger bypass valve leakage rates because the flow to the SPS header branches far downstream of the heat exchanger and represents only a small percentage (<5%) of the total flow. However, to account for instrument uncertainty, a flow margin of 40 gpm is applied to the acceptance criteria in the SPS surveillance.

DEPRESSURIZATION SYSTEMS (Continued)

Under full power operating conditions, blowdown from an initial suppression chamber water temperature of 95°F results in a water temperature of approximately 135°F immediately following blowdown which is below the 200°F used for complete condensation via mitered T-quencher devices. At this temperature and atmospheric pressure, the available NPSH exceeds that required by both the RHR and core spray pumps, thus there is no dependency on containment overpressure during the accident injection phase. If both RHR loops are used for containment cooling, there is no dependency on containment overpressure for post-LOCA operations.

Experimental data indicates that excessive steam condensing loads can be avoided if the peak local temperature of the suppression pool is maintained below 200°F during any period of relief valve operation. Specifications have been placed on the envelope of reactor operating conditions so that the reactor can be depressurized in a timely manner to avoid the regime of potentially high suppression chamber loadings.

Because of the large volume and thermal capacity of the suppression pool, the volume and temperature normally changes very slowly and monitoring these parameters daily is sufficient to establish any temperature trends. By requiring the suppression pool temperature to be frequently recorded during periods of significant heat addition, the temperature trends will be closely followed so that appropriate action can be taken. The requirement for an external visual examination following any event where potentially high loadings could occur provides assurance that no significant damage was encountered. Particular attention should be focused on structural discontinuities in the vicinity of the relief valve discharge since these are expected to be the points of highest stress.

In addition to the limits on temperature of the suppression chamber pool water, operating procedures define the action to be taken in the event a safety-relief valve inadvertently opens or sticks open. As a minimum this action shall include: (1) use of all available means to close the valve, (2) initiate suppression pool water cooling, (3) initiate reactor shutdown, and (4) if other safety-relief valves are used to depressurize the reactor, their discharge shall be separated from that of the stuck-open safety relief valve to assure mixing and uniformity of energy insertion to the pool.

In conjunction with the Mark I containment Long Term Program, a plant unique analysis was performed which demonstrated that the containment, the attached piping and internal structures meet the applicable structural and mechanical acceptance criteria for Hope Creek. The evaluation followed the design basis loads defined in the Mark I Load Definition Report, NEDO-21888, December 1978, as modified by NRC SER NUREG 0661, July 1980 and Supplement 1, August 1982, to ensure that hydrodynamic loads, appropriate for the life of the plant, were applied.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 128 TO FACILITY OPERATING LICENSE NO. NPF-57

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

## 1.0 INTRODUCTION

By letter dated December 27, 1999, as supplemented April 11, 2000, the Public Service Electric & Gas Company (PSE&G or the licensee) submitted a request for changes to the Hope Creek Generating Station (HCGS) Technical Specifications (TSs). The proposed amendment would revise TSs 4.6.2.2.b, “Suppression Pool Spray,” and 4.6.2.3.b, “Suppression Pool Cooling,” to modify the acceptance criteria associated with flow rate testing of the Residual Heat Removal (RHR) system pumps. The April 11, 2000, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination or expand the scope of the amendment request.

## 2.0 BACKGROUND

As described in the HCGS Updated Final Safety Analysis Report (UFSAR) Sections 5.4.7 and 6.2.2, the RHR system consists of four independent loops which are designated as A, B, C, and D. Each loop consists of a motor-driven pump, piping, valves, instrumentation and controls. In addition, RHR Loops A and B each have a heat exchanger that is cooled by an independent loop of the Safety Auxiliaries Cooling system (SACS). The design for RHR Loops A and B also includes a bypass line around each of the heat exchangers. Each bypass line includes a control valve that is used to regulate the flow through the respective heat exchanger. As described in the Bases for TS 3/4.6.2, the valve is not designed to be a tight shut-off valve and a portion of the total RHR flow travels through the bypass line even when the valve is closed.

Containment heat removal is accomplished during and after an accident by operating the RHR system in the Suppression Pool Cooling (SPC) mode and/or the Suppression Pool Spray (SPS) mode. During the SPC mode, water is drawn from the suppression pool, pumped through the RHR heat exchangers, and is delivered to the suppression pool. During the SPS mode, water is drawn from the suppression pool, pumped through the RHR heat exchangers, and is delivered to the suppression pool spray sparger. During both of these modes the containment heat loads are transferred to the SACS via the RHR heat exchangers. The design basis purpose of the SPC and SPS modes is to maintain containment integrity following a loss-of-coolant accident (LOCA) by preventing excessive containment temperatures and pressures, respectively.

Currently, TS 4.6.2.3.b requires that the SPC mode of the RHR system be demonstrated operable:

> By verifying that each of the required RHR pumps develop a flow of at least 10,000 gpm on recirculation flow through the RHR heat exchanger, its associated closed bypass valve, and the suppression pool when tested pursuant to Specification 4.0.5.

Similarly, TS 4.6.2.2.b requires that the SPS mode of the RHR system be demonstrated operable:

> By verifying that each of the required RHR pumps develop a flow of at least 500 gpm on recirculation flow through the RHR heat exchanger, its associated closed bypass valve, and the suppression pool spray sparger when tested pursuant to Specification 4.0.5.

Technical Specification 4.0.5 invokes the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code (the Code), Section XI Inservice Testing (IST) of pumps and valves, indicating that the intent of TSs 4.6.2.2.b and 4.6.2.3.b is to confirm the performance of the RHR pumps when aligned to the respective flowpath. The periodic testing of the RHR pumps is required in order to comply with General Design Criteria (GDC) 40, of Appendix A to Title 10 of the Code of Federal Regulations (10 CFR) Part 50. This GDC requires, in part, that the containment heat removal system be designed to permit appropriate testing to assure the operability and performance of the active components of the system.

As discussed in the licensee's submittal dated December 27, 1999, the current surveillance requirements specified in TSs 4.6.2.2.b and 4.6.2.3.b were established by HCGS Amendment No. 94. The purpose of that amendment was to provide surveillance requirements that permit the RHR flow acceptance criteria to account for RHR heat exchanger bypass valve leakage. The justification for the Amendment No. 94 changes relied, in part, on: 1) the containment heat removal analyses, which determined that only 8,985 gpm of RHR flow was required through the heat exchanger to provide for adequate heat removal in the SPC mode; and 2) periodic verification of actual heat exchanger flow rates. Subsequent to the issuance of Amendment No. 94, PSE&G re-evaluated containment heat removal analyses in order to modify the Ultimate Heat Sink (UHS) temperature limits at HCGS (reference Amendment No. 120). The analyses used to support the UHS temperature limit changes assumed a flow rate of 10,000 gpm through the RHR heat exchanger with the RHR system in the SPC mode of operation. Therefore, the current design basis analyses assume that the amount of flow necessary to ensure adequate containment heat removal is 10,000 gpm through the heat exchanger itself (i.e., 10,000 gpm flow rate does not consider leakage through the closed bypass valve). The licensee's application also states that the 500 gpm RHR pump flow acceptance criteria for the SPS mode (as stated in TS 4.6.2.2.b) is based on all of the 500 gpm passing through the heat exchanger. Therefore, in order to ensure that the RHR system is tested in a manner that is consistent with the current design basis analyses and assumptions, the licensee has proposed to revise TSs 4.6.2.2.b and 4.6.2.3.b to replace the words “its associated closed bypass valve” with “(after consideration of flow through the closed bypass valve).”

In addition, the licensee has proposed to revise the RHR flow rate acceptance criteria to account for instrument uncertainties of 40 gpm for the SPS mode and 160 gpm for the SPC mode. Therefore, the TS 4.6.2.2.b acceptance criteria would be changed from 500 gpm to 540 gpm and the TS 4.6.2.3.b acceptance criteria would be changed from 10,000 gpm to 10,160 gpm. Changes to the associated TS Bases would also be made to reflect the TS wording changes described above and to discuss the surveillance testing methodology for the SPS and SPC modes of RHR operation.

## 3.0 EVALUATION

The intent of TSs 4.6.2.2.b and 4.6.2.3.b, based on the reference to the IST requirements associated with TS 4.0.5, is to confirm RHR pump performance. As discussed in UFSAR Section 3.9.6, the IST program verifies that pumps and valves required for safety remain in a state of operational readiness to perform their safety-related functions throughout the lifetime of the plant. As discussed in the HCGS Bases for TS 3/4.6.2, verifying that each RHR pump develops the required flow rate while operating in the applicable mode, with flow through the associated heat exchanger and its closed bypass valve, ensures that pump performance has not degraded during the cycle. Flow is a normal test of centrifugal pump performance required by Section XI of the ASME Code. This test confirms one point on the pump baseline curve and is indicative of overall performance. The IST confirms component operability, trends performance, and detects incipient failures by indicating abnormal performance.

As discussed in the Section 2.0 above, for the SPS and SPC modes of RHR operation to be considered capable of performing their design basis containment heat removal functions, the flow through the RHR heat exchanger (not including bypass line flow) must be 500 gpm for the SPS mode and 10,000 gpm for the SPC mode. The RHR system flow rate is measured downstream of the combined RHR heat exchanger and heat exchanger bypass line flow paths when performing the surveillance testing associated with TSs 4.6.2.2.b and 4.6.2.3.b. These surveillance tests are performed with the associated bypass valve closed. Since the bypass valves are not leak-tight, a portion of the total measured RHR flow is through the bypass line. The current wording in TSs 4.6.2.2.b and 4.6.2.3.b can be interpreted to imply that the RHR pump acceptance criteria flow rates (i.e., 500 gpm and 10,000 gpm respectively) include the flow leaking through the closed bypass valves. With this interpretation, there is no margin between the flow rates assumed in the design basis analyses and the flow rates specified in the TS acceptance criteria. The licensee’s proposed replacement of the words “its associated closed bypass valve” with “(after consideration of flow through the closed bypass valve)” in TSs 4.6.2.2.b and 4.6.2.3.b clarifies the wording such that the TS acceptance criteria flow rates will apply to the flow through the heat exchanger only. In addition, the licensee has proposed to revise the TS 4.6.2.2.b acceptance criteria from 500 gpm to 540 gpm and the TS

4.6.2.3.b acceptance criteria from 10,000 gpm to 10,160 gpm to account for instrument uncertainties in the flow measurement.

The proposed TS changes do not affect the design or operation of the RHR system. The proposed changes affect the flow acceptance criteria when testing the RHR pumps in the SPS and SPC modes of operation. These changes will ensure that the RHR system is tested in a manner that is consistent with the current design basis analyses and assumptions. The changes will also provide assurance that the RHR pumps will be capable of performing their containment heat removal functions in the SPS and SPC modes of operation, consistent with the requirements of GDC 40. Based on the above evaluation, the staff concludes that the proposed changes are acceptable.

The staff has also reviewed the proposed changes to the TS Bases and finds that they appropriately reflect the changes to TSs 4.6.2.2.b and 4.6.2.3.b and clarify the surveillance testing methodology for the SPS and SPC modes of RHR operation.

## 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State Official was notified of the proposed issuance of the amendment. The State official had no comments.

## 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (65 FR 4289). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Ennis

Date: June 16, 2000