

May 7, 1992

Mr. Steven E. Miltenberger
 Vice President and Chief Nuclear
 Officer
 Public Service Electric & Gas
 Company
 Post Office Box 236
 Hancocks Bridge, New Jersey 08038

Dear Mr. Miltenberger:

SUBJECT: SNUBBER VISUAL INSPECTION INTERVALS LICENSE AMENDMENT, HOPE CREEK
 GENERATING STATION (TAC NO. M82877)

The Commission has issued the enclosed Amendment No. 50 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 February 24, 1992.

This amendment revised the snubber visual inspection requirements which are delineated in TS Surveillance 4.7.5. The revision incorporated an alternate schedule for snubber visual inspections which was recommended by the NRC in Generic Letter 90-09.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice. You are requested to inform the NRC,2 in writing, when this amendment has been implemented.

Sincerely,

/S/

Stephen Dembek, Project Manager
 Project Directorate I-2
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 50 to
 License No. NPF-57
2. Safety Evaluation

cc w/enclosures:

See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 7, 1992

Docket No. 50-354

Mr. Steven E. Miltenberger
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Public Service Electric & Gas
Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

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Sincerely,

A handwritten signature in cursive script, reading "Stephen Dembek", is written above the typed name.

Stephen Dembek, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

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2. Safety Evaluation

cc w/enclosures:
See next page

Mr. Steven E. Miltenberger
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Hope Creek Generating Station

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-354

HOPE CREEK GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 50
License No. NPF-57

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Public Service Electric & Gas Company (PSE&G) dated February 24, 1992 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. 50, 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 of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Charles L. Miller

Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 7, 1992

ATTACHMENT TO LICENSE AMENDMENT NO. 50

FACILITY OPERATING LICENSE NO. NPF-57

DOCKET NO. 50-354

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages provided to maintain document completeness.*

<u>Remove</u>	<u>Insert</u>
xiii	xiii
xiv	xiv*
3/4 7-13	3/4 7-13
3/4 7-14	3/4 7-14
3/4 7-17	3/4 7-17*
---	3/4 7-17a
---	3/4 7-17b
3/4 7-18	3/4 7-18*
B 3/4 7-1	B 3/4 7-1*
B 3/4 7-2	B 3/4 7-2
B 3/4 7-3	B 3/4 7-3
B 3/4 7-4	B 3/4 7-4*

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3/4.7.5 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.5 All snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1,2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.5.g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.5 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.5-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.5-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment 50.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection period, providing that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type on that system that may be generically susceptible; or (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.4.f. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

d. Transient Event Inspection

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients, as determined from a review of operational data or a visual inspection of the systems, within 72 hours for accessible systems and 6 months for inaccessible systems following this determination. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement, or (2) evaluation of in-place snubber piston setting.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

OPERABILITY of other snubbers irrespective of type which may be subject to the same failure mode.

For the snubbers found inoperable, an engineering evaluation shall be performed on the components to which the inoperable snubbers are attached. The purpose of this engineering evaluation shall be to determine if the components to which the inoperable snubbers are attached were adversely affected by the inoperability of the snubbers in order to ensure that the component remains capable of meeting the designed service.

If any snubber selected for functional testing either fails to lock up or fails to move, i.e., frozen-in-place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same type subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated in Specification 4.7.5.e. for snubbers not meeting the functional test acceptance criteria.

h. Functional Testing of Repaired and Replaced Snubbers

Snubbers which fail the visual inspection or the functional test acceptance criteria shall be repaired or replaced. Replacement snubbers and snubbers which have repairs which might affect the functional test result shall be tested to meet the functional test criteria before installation in the unit. Mechanical snubbers shall have met the acceptance criteria subsequent to their most recent service, and the freedom-of-motion test must have been performed within 12 months before being installed in the unit.

i. Snubber Service Life Replacement Program

The service life of all snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The maximum expected service life for various seals, springs, and other critical parts shall be extended or shortened based on monitored test results and failure history. Critical parts shall be replaced so that the maximum service life will not be exceeded during a period when the snubber is required to be OPERABLE. The parts replacements shall be documented and the documentation shall be retained in accordance with Specification 6.10.3.

TABLE 4.7.5-1

SNUBBER VISUAL INSPECTION INTERVAL

NUMBER OF UNACCEPTABLE SNUBBERS

Population or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, that decision shall be made and documented before any inspection and shall serve as the basis upon which the next inspection interval for that category is determined.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use the next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

(Continued)

TABLE 4.7.5-1 (Continued)

SNUBBER VISUAL INSPECTION INTERVAL

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is:

$$I_1 = I_0 - I_0 \cdot \frac{1}{3} \cdot \frac{U - B}{C - B}$$

where:

I_1 = next inspection interval

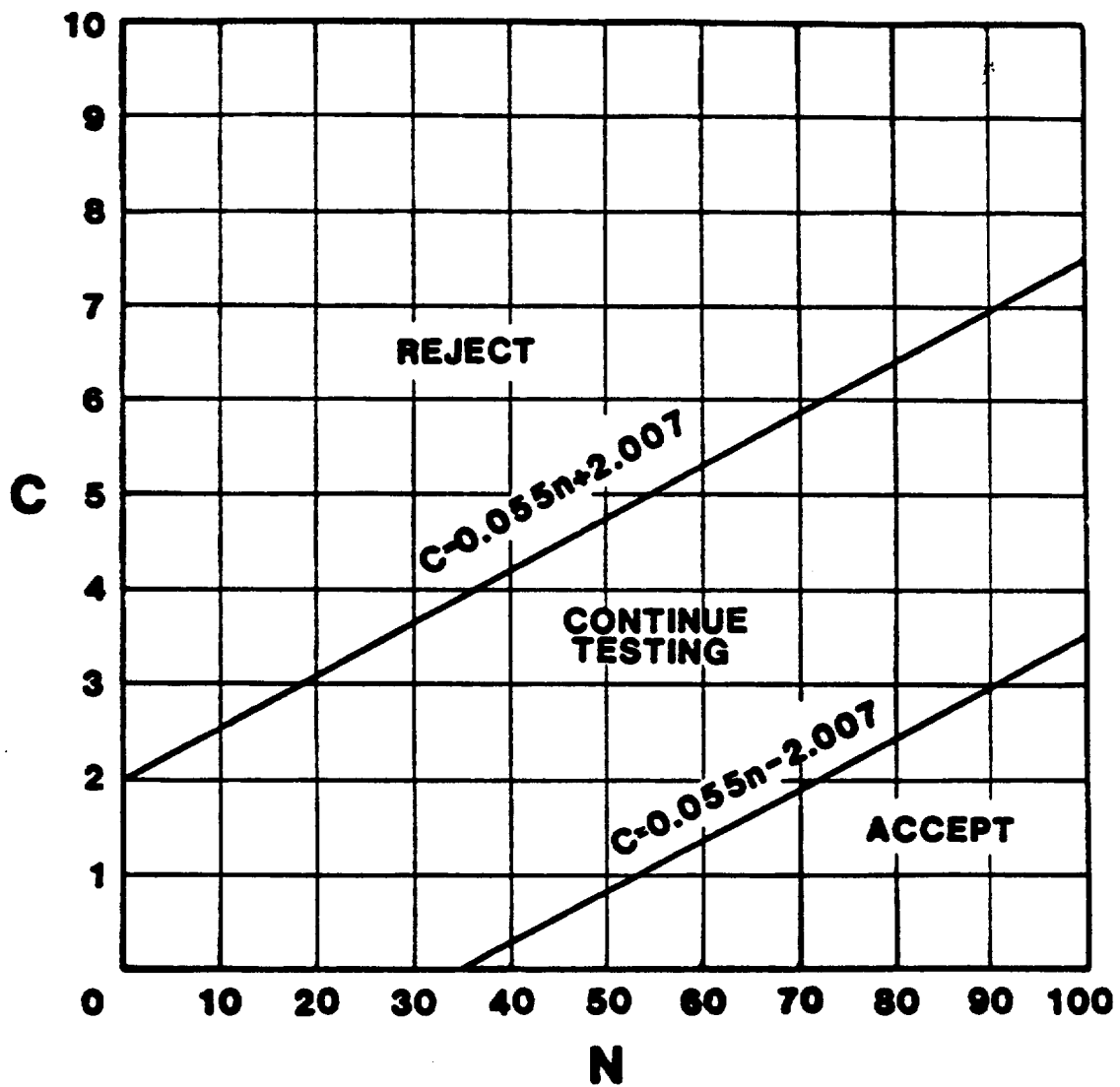
I_0 = previous inspection interval

U = number of unacceptable snubbers found during the previous inspection interval

B = number in Column B

C = number in Column C

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.



SAMPLE PLAN 2) FOR SNUBBER FUNCTIONAL TEST

Figure 4.7.5-1

3/4.7 PLANT SYSTEMS

BASES

3/4.7.1 SERVICE WATER SYSTEMS

The OPERABILITY of the station service water and the safety auxiliaries cooling systems ensures that sufficient cooling capacity is available for continued operation of the SACS and its associated safety-related equipment during normal and accident conditions. The redundant cooling capacity of these systems, assuming a single failure, is consistent with the assumptions used in the accident conditions within acceptable limits.

3/4.7.2 CONTROL ROOM EMERGENCY FILTRATION SYSTEM

The OPERABILITY of the control room emergency filtration system ensures that 1) the ambient air temperature does not exceed the allowable temperature for continuous duty rating for the equipment and instrumentation cooled by this system and 2) the control room will remain habitable for operations personnel during and following all design basis accident conditions. Continuous operation of the system with the heaters and humidity control instruments OPERABLE for 10 hours during each 31 day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system in conjunction with control room design provisions is based on limiting the radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR Part 50.

3/4.7.3 FLOOD PROTECTION

The requirement for flood protection ensures that facility flood protection features are in place in the event of flood conditions. The limit of elevation 10.5' Mean Sea Level is based on the elevation at which facility flood protection features provide protection to safety related equipment.

3/4.7.4 REACTOR CORE ISOLATION COOLING SYSTEM

The reactor core isolation cooling (RCIC) system is provided to assure adequate core cooling in the event of reactor isolation from its primary heat sink and the loss of feedwater flow to the reactor vessel without requiring actuation of any of the Emergency Core Cooling System equipment. The RCIC system is conservatively required to be OPERABLE whenever reactor steam dome pressure exceeds 150 psig. This pressure is substantially below that for which the RCIC system can provide adequate core cooling for events requiring the RCIC system.

The RCIC system specifications are applicable during OPERATIONAL CONDITIONS 1, 2 and 3 when reactor vessel steam dome pressure exceeds 150 psig because RCIC is the primary non-ECCS source of emergency core cooling when the reactor is pressurized.

With the RCIC system inoperable, adequate core cooling is assured by the OPERABILITY of the HPCI system and justifies the specified 14 day out-of-service period.

PLANT SYSTEMS

BASES

REACTOR CORE ISOLATION COOLING SYSTEM (Continued)

The surveillance requirements provide adequate assurance that RCIC will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest possible moment.

3/4.7.5 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety related system.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Plant Operations Review Committee. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guide 8.8 and 8.10. The addition or deletion of any snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to each safety-related system. Therefore, the required inspection interval is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories. This inspection schedule is based on the guidance provided in Generic Letter 90-09. In order to establish the inspection frequency for each type of snubber on a safety-related system, it was assumed that the frequency of snubber failures and initiating events is constant with time and that the failure of any snubber on that system could cause the system to be unprotected and to result in failure during an assumed

PLANT SYSTEMS

BASES

SNUBBERS (Continued)

initiating event. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results required a shorter inspection interval will override the previous schedule.

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers.

To provide assurance of snubber functional reliability one of three functional testing methods is used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure, or
2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7.5-1, or
3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.

Figure 4.7.5-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubbers for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

The service life of a snubber is evaluated via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (i.e., newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

PLANT SYSTEMS

BASES

3/4.7.6 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism, i.e., sealed sources within radiation monitoring devices, are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.7.7 MAIN TURBINE BYPASS SYSTEM

The main turbine bypass system is required to be OPERABLE consistent with the assumptions of the feedwater controller failure analysis for FSAR Chapter 15.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 50 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 February 24, 1992, the Public Service Electric & Gas Company and Atlantic City Electric Company (the licensees) submitted a request for changes to the Hope Creek Generating Station, Technical Specifications (TS). The requested changes would revise the snubber visual inspection requirements which are delineated in TS Surveillance 4.7.5. The revision incorporated an alternate schedule for snubber visual inspections which was recommended by the NRC in Generic Letter (GL) 90-09.

2.0 EVALUATION

The TS specify a schedule for snubber visual inspections that is based on the number of inoperable snubbers found during the previous visual inspection. Because the current schedule for snubber visual inspections is based only on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the snubber population, licensees having a large number of snubbers find that the visual inspection schedule is excessively restrictive. Some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements. To alleviate this situation the NRC staff (the staff) issued GL 90-09, "ALTERNATIVE REQUIREMENTS FOR SNUBBER VISUAL INSPECTION INTERVALS AND CORRECTIVE ACTIONS." The GL 90-09 snubber inspection schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the size of the various snubber populations or categories.

The staff has reviewed the licensees' submittal. The staff finds that the licensees' submittal is consistent with the guidance in GL 90-09. Therefore, the licensees' submittal is acceptable.

The staff, with the concurrence of the licensees, made the following editorial changes to the TS:

Reference to the newly created TS Table 4.7.5-1 was added to TS index page xiii.

In Note 1 on TS Table 4.7.5-1 the word "unaccessible" was changed to read "inaccessible."

The two above changes were purely administrative and did not increase the scope of the original amendment request and did not affect the staff's original no significant hazards determination.

3.0 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.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a surveillance requirement. 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 (57 FR 11116). 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.

5.0 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.

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Date: May 7, 1992