Docket No. 50-354

August 28, 1989

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: INCREASE HYDROSTATIC TEST PRESSURE FOR CONTAINMENT ISOLATION VALVES (TAC NO. 73382)

Re: HOPE CREEK GENERATING STATION

The Commission has issued the enclosed Amendment No. 32 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 June 6, 1989.

This amendment increases the hydrostatic test pressure for containment isolation valves provided with a water seal from the suppression pool, clearly defines as-left penetration leakage for these same valves, and deletes an incorrect cross-reference.

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

Sincerely,

/S/

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

Enclosures:
1. Amendment No. 32 to License No. NPF-57
2. Safety Evaluation

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1/1

cc w/enclosures:
See next page

DISTRIBUTION w/enclosures:

Docket File	MO'Brien (2)	Wanda Jones	SVarga
NRC PDR	OGC	JCalvo	BBoger
Local PDR	DHagan	Tech Branch	JDyer
PDI-2 Reading	EJordan	ACRS (10)	EWenzinger
WButler	BGrimes	CMiles, GPA/PA	
CShiraki(3)/SBrown	TMeek (4)	RDiggs, ARM/LFMB	

[73382]

PDI-2/LA	PDI-2/PM	PDI-2/D	OGC
MO'Brien	CShiraki:tr	WButler	
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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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. 32
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 June 6, 1989 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. 32, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PSE&G shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This 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

Walter R. Butler

Walter R. Butler, 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: August 28, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 32

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.*

Remove	Insert
3/4 6-1*	3/4 6-1*
3/4 6-2	3/4 6-2
3/4 6-3	3/4 6-3
3/4 6-4	3/4 6-4
3/4 6-41*	3/4 6-41*
3/4 6-42	3/4 6-42

3/4.6 CONTAINMENT SYSTEMS

3/4.6.1 PRIMARY CONTAINMENT

PRIMARY CONTAINMENT INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.1 PRIMARY CONTAINMENT INTEGRITY shall be maintained.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2* and 3.

ACTION:

Without PRIMARY CONTAINMENT INTEGRITY, restore PRIMARY CONTAINMENT INTEGRITY within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.1 PRIMARY CONTAINMENT INTEGRITY shall be demonstrated:

a. After each closing of each penetration subject to Type B testing, except the primary containment air locks, if opened following Type A or B test, by leak rate testing the seals with gas at Pa, 48.1 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Surveillance Requirement 4.6.1.2.d for all other Type B and C penetrations, the combined leakage rate is less than or equal to 0.60 La.

b. At least once per 31 days by verifying that all primary containment penetrations** not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position, except as provided in Table 3.6.3-1 of Specification 3.6.3.

c. By verifying each primary containment air lock is in compliance with the requirements of Specification 3.6.1.3.

d. By verifying the suppression chamber is in compliance with the requirements of Specification 3.6.2.1.

---

*See Special Test Exception 3.10.1

**Except valves, blind flanges, and deactivated automatic valves which are located inside the primary containment, and are locked, sealed or otherwise secured in the closed position. These penetrations shall be verified closed during each COLD SHUTDOWN except such verification need not be performed when the primary containment has not been de-inerted since the last verification or more often than once per 92 days.

LIMITING CONDITION FOR OPERATION

3.6.1.2 Primary containment leakage rates shall be limited to:

a. An overall integrated leakage rate of less than or equal to L_a, 0.5 percent by weight of the containment air per 24 hours at P_a, 48.1 psig.

b. A combined leakage rate of less than or equal to 0.60 L_a for all penetrations and all valves listed in Table 3.6.3-1, except for main steam line isolation valves*, valves which form the boundary for the long-term seal of the feedwater lines, and other valves which are hydrostatically tested per Table 3.6.3-1, subject to Type B and C tests when pressurized to P_a, 48.1 psig.

c. *Less than or equal to 46.0 scfh combined through all four main steam lines when tested at 5 psig (seal system ΔP).

d. A combined leakage rate of less than or equal to 10 gpm for all containment isolation valves which form the boundary for the long-term seal of the feedwater lines in Table 3.6.3-1, when tested at 1.10 Pa, 52.9 psig.

e. A combined leakage rate of less than or equal to 10 gpm for all other penetrations and containment isolation valves in hydrostatically tested lines in Table 3.6.3-1 which penetrate the primary containment, when tested at 1.10 Pa, 52.9 psig Δp.

APPLICABILITY: When PRIMARY CONTAINMENT INTEGRITY is required per Specification 3.6.1.1.

ACTION:

With:

a. The measured overall integrated primary containment leakage rate exceeding 0.75 L_a or

b. The measured combined leakage rate for all penetrations and all valves listed in Table 3.6.3-1, except for main steam line isolation valves*, valves which form the boundary for the long-term seal of the feedwater lines, and other valves which are hydrostatically tested per Table 3.6.3-1, subject to Type B and C tests exceeding 0.60 L_a, or

c. The measured leakage rate exceeding 46.0 scfh combined through all four main steam lines, or

d. The measured combined leakage rate for all containment isolation valves which form the boundary for the long-term seal of the feedwater lines in Table 3.6.3-1 exceeding 10 gpm, or

e. The measured combined leakage rate for all other penetrations and containment isolation valves in hydrostatically tested lines in Table 3.6.3-1 which penetrate the primary containment exceeding 10 gpm,

restore:

a. The overall integrated leakage rate(s) to less than or equal to 0.75 L_a, and

*Exemption to Appendix "J" of 10 CFR 50.

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

b. The combined leakage rate for all penetrations and all valves listed in Table 3.6.3-1, except for main steam line isolation valves*, valves which form the boundary for the long-term seal of the feedwater lines, and other valves which are hydrostatically tested per Table 3.6.3-1, subject to Type B and C tests to less than or equal to 0.60 L_a, and

c. The leakage rate to less than or equal to 46.0 scfh combined through all four main steam lines, and

d. The combined leakage rate for all containment isolation valves which form the boundary for the long-term seal of the feedwater lines in Table 3.6.3-1 to less than or equal to 10 gpm, and

e. The combined leakage rate for all other penetrations and containment isolation valves in hydrostatically tested lines in Table 3.6.3-1 which penetrate the primary containment to less than or equal to 10 gpm,

prior to increasing reactor coolant system temperature above 200°F.

SURVEILLANCE REQUIREMENTS

4.6.1.2 The primary containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR 50 using the methods and provisions of ANSI N45.4 - 1972:

a. Three Type A Overall Integrated Containment Leakage Rate tests shall be conducted at 40 $\pm$ 10 month intervals during shutdown at P_a, 48.1 psig, during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection.

b. If any periodic Type A test fails to meet 0.75 L_a, the test schedule for subsequent Type A tests shall be reviewed and approved by the Commission. If two consecutive Type A tests fail to meet 0.75 L_a, a Type A test shall be performed at least every 18 months until two consecutive Type A tests meet 0.75 L_a, at which time the above test schedule may be resumed.

c. The accuracy of each Type A test shall be verified by a supplemental test which:

1. Confirms the accuracy of the test by verifying that the difference between the supplemental data and the Type A test data is within 0.25 L_a.

2. Has duration sufficient to establish accurately the change in leakage rate between the Type A test and the supplemental test.

3. Requires the quantity of gas injected into the containment or bled from the containment during the supplemental test to be between 0.75 L_a and 1.25 L_a.

*Exemption to Appendix "J" of 10 CFR 50.

SURVEILLANCE REQUIREMENTS (Continued)

The formula to be used is: $[L_o + L_{am} - 0.25\ L_a] \leq L_c \leq [L_o + L_{am} + 0.25\ L_a]$ where $L_c \equiv$ supplement test result; $L_o \equiv$ superimposed leakage; and $L_a \equiv$ measured Type A leakage.

d. Type B and C tests shall be conducted with gas at P_a, 48.1 psig*, at intervals no greater than 24 months** except for tests involving:

1. Air locks,
2. Main steam line isolation valves,
3. Valves pressurized with fluid from a seal system,
4. All containment isolation valves in hydrostatically tested lines in Table 3.6.3-1 which penetrate the primary containment, and
5. Purge supply and exhaust isolation valves with resilient material seals.

e. Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.6.1.3.

f. Main steam line isolation valves shall be leak tested at least once per 18 months.

g. Containment isolation valves which form the boundary for the long-term seal of the feedwater lines in Table 3.6.3-1 shall be hydrostatically tested at 1.10 P_a, 52.9 psig, at least once per 18 months.

h. All containment isolation valves in hydrostatically tested lines in Table 3.6.3-1 which penetrate the primary containment shall be leak tested at least once per 18 months.

i. Purge supply and exhaust isolation valves with resilient material seals shall be tested and demonstrated OPERABLE per Surveillance Requirements 4.6.1.8.2.

j. The provisions of Specification 4.0.2 are not applicable to Specifications 4.6.1.2.a, 4.6.1.2.b, 4.6.1.2.c, 4.6.1.2.d, and 4.6.1.2.e.

*Unless a hydrostatic test is required per Table 3.6.3-1.

**A type C test interval extension to the first refueling outage is permissible for primary containment isolation valves listed in Table 3.6.3-1, which are identified in Public Service Electric & Gas Company's letter to the NRC (letter No. NLR-N87047), dated April 3, 1987, as needing a plant outage to test. For this one time test interval, the requirements of Section 4.0.2 are not applicable.

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

VALVE FUNCTION AND NUMBER	PENETRATION NUMBER	MAXIMUM ISOLATION TIME (Seconds)	NOTE(S)	P&ID
6. Group 51 - Reactor Core Isolation Cooling System				M-49-1
Outside				
FC-XV-4150A	J20A	NA	6	
FC-XV-4150B	J40B	NA	6	
FC-XV-4150C	J20B	NA	6	
FC-XV-4150D	J40A	NA	6	
7. Group 52 - Residual Heat Removal System				M-51-1
Outside				
BC-XV-4411A	J33A	NA	6	
BC-XV-4411B	J23B	NA	6	
BC-XV-4411C	J35A	NA	6	
BC-XV-4411D	J36B	NA	6	
BC-XV-4429A	J33D	NA	6	
BC-XV-4429B	J23A	NA	6	
BC-XV-4429C	J35C	NA	6	
BC-XV-4429D	J36A	NA	6	
8. Group 53 - Core Spray System				M-52-1
Outside				
BE-XV-F018A	J19C	NA	6	
BE-XV-F018B	J30F	NA	6	
9. Group 54 - High Pressure Coolant Injection System				M-55-1
Outside				
FD-XV-4800A	J19A	NA	6	
FD-XV-4800B	J29A	NA	6	
FD-XV-4800C	J19B	NA	6	
FD-XV-4800D	J29B	NA	6	

TABLE 3.6.3-1

PRIMARY CONTAINMENT ISOLATION VALVES

NOTES

NOTATION

1. Main Steam Isolation Valves are sealed with a seal system that maintains a positive pressure of 5 psig above reactor pressure. Leakage is in-leakage and is not added to 0.60 La allowable leakage.*

2. Containment Isolation Valves are sealed with a water seal from the HPCI and/or RCIC system to form the long-term seal boundary of the feedwater lines. The valves are tested with water at 1.10 Pa, 52.9 psig, to ensure the seal boundary will prevent by-pass leakage. Seal boundary liquid leakage will be limited to 10 gpm.

3. Containment Isolation Valve, Type C gas test at Pa, 48.1 psig. Leakage added to 0.60La allowable leakage.

4. Containment Isolation Valve, Type C water test at 1.10 Pa, 52.9 psig Δ P. Leakage added to 10 gpm allowable leakage.

5. Containment boundary is discharge nozzle of relief valve, leakage tested during Type A test.*

6. Drywell and suppression chamber pressure and level instrument root valves and excess flow check valves, leakage tested during Type A.*

7. Explosive shear valves (SE-V021 through SE-V025) not Type C tested.*

8. Surveillances to be performed per Specification 3.6.1.8.

9. All valve I.D. numbers are preceded by a numeral 1 which represents an Unit 1 valve.

10. The reactor vessel head seal leak detection line (penetration J5C) excess flow check valve (BB-XV-3649) is not subject to OPERABILITY testing. This valve will not be exposed to primary system pressure except under the unlikely conditions of a seal failure where it could be partially pressurized to reactor pressure. Any leakage path is restricted at the source; therefore, this valve need not be OPERABILITY tested.

*Exemption to Appendix J of 10 CFR Part 50.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO.32 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 June 6, 1989, Public Service Electric & Gas Company requested an amendment to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. The proposed amendment would revise: (a) Technical Specification (TS) Section 3.6.1.2.e and Table 3.6.3-1 to increase the hydrostatic test pressure from 1.0 P(a) to 1.10 P(a) for containment isolation valves provided with a water seal from the suppression pool, (b) reword Technical Specification 3.6.1.2.e to clearly define as-left penetration leakage for these same valves, and (c) delete an incorrect cross-reference in Section 4.6.1.2.i.

2.0 EVALUATION

A. The valves at issue in this change are those which provide containment isolation for lines which penetrate the suppression pool and are water filled following an accident scenario which requires their long-term isolation. TS 3.6.1.2.e addresses these valves and requires:

> A combined leakage rate of less than or equal to 10 gpm for all other containment isolation valves in hydrostatically tested lines in Table 3.6.3-1 which penetrate the primary containment, when tested at P(a), 48.1 psig delta pressure.

This requirement is also reiterated in TS Table 3.6.3-1, Note 4. However, Paragraph III.C.2 of 10 CFR 50, Appendix J requires:

(a) Valves, unless pressurized with a fluid (e.g. water, nitrogen) from a seal system, shall be pressurized with air or nitrogen at a pressure of P(a).

(b) Valves, which are sealed with fluid from a seal system shall be pressurized with that fluid to a pressure not less than 1.10 P(a).

Since the subject valves are provided with a seal system as discussed in Updated Final Safety Analysis Report (UFSAR) Section 6.2.3, 10 CFR 50 Appendix J, Paragraph III.C.2.b applies and the valves should be tested with water to a test pressure of 1.10 P(a).

Therefore, PSE&G has concluded that the TS for the subject valves is in error and should require a Type C water test at 1.10 P(a) with the combined leakage not exceeding 10 gpm.

In order to demonstrate that the results of the Type C test conducted during the last refueling outage (at a pressure of 48.1 psig, 1.0 P(a) provided satisfactory assurance of containment integrity, PSE&G has calculated what the leak rate would have been at a pressure of 52.9 psig (1.10 P(a)). A conversion calculation has been utilized based upon Equation 3-21 on page 3.5 of Crane Technical Paper No. 410. The measured leak rate, at a test pressure of 48.1 psig and accounting for the maximum pathway leakage, totaled 2.4 gpm; while the calculated leak rate, which could be expected if testing were performed at 52.9 psig, would have been 2.5 gpm. The difference in leakage rates is less than 5% and when compared to the maximum leakage limit of 10 gpm, the difference is a negligible 1%. As a result, PSE&G has concluded that the hydrostatic testing conducted during the last refueling outage, at a test pressure of 1.0 P(a), is representative of the leakage which could have been expected if testing was performed at a pressure of 1.10 P(a).

Since the hydrostatic test pressure requirement of 10 CFR 50, Appendix J must be met, a change to the TS is required to increase the test pressure from 1.0 P(a) to 1.10 P(a) for hydrostatically tested containment isolation valves. Attachment 2 contains the necessary TS changes.

B. A second change to TS 3.6.1.2.e is necessary to indicate that the 10 gpm leak rate criteria applies to penetrations and valves in order to account for in-series containment isolation valves. When testing containment penetrations with in-series valves, the as-left leakage for the subject penetration is calculated using the valve with the highest leakage (i.e. a worst case single failure of the valve with the lowest leakage is assumed.) The current TS wording could be misconstrued to mean that, for penetrations with in-series valves, the as-left leakage rate is the sum total of all valves in the given penetration. In order to eliminate this ambiguity, a reference to penetrations should be added to this specification as shown in Attachment 2.

The proposed wording would be the same as wording contained in TS 3.6.1.2.b which identifies the requirement to maintain containment isolation valve leakage "...less than or equal to 0.60 L(a) for all penetrations and all valves..." Since this specification makes specific mention of "all penetrations and all valves," when in-series valves in a given penetration are tested the as-left leakage rate assigned to the subject penetration is calculated using the valve with the highest leakage. From a physical standpoint, even if one of two valves in a given penetration is leaking at rate

greater than the other, the leakage rate of the entire penetration cannot be any greater than the leakage associated with the valve with the lowest leakage. However, applying single failure criterion requires assuming the failure of the valve with the lowest leakage. Hence, the leakage rate calculated for the penetration uses the leakage associated with the valve with the highest leakage.

This change clarifies the wording of the TS to correctly calculate the leakage rate of a penetration and therefore is acceptable.

C. Amendment 16 revised the Drywell and Suppression Chamber Purge System specification to permit the operation of the purge system for up to 120 hours per year. Original Surveillance Requirements 4.6.1.8.2 and 4.6.1.8.3 discussed the test requirements for the purge supply and exhaust valves with resilient material seals. Amendment 16 combined these two test criteria under current Surveillance Requirement 4.6.1.8.2. Therefore, TS 4.6.1.2.i must be revised to delete the reference to TS 4.6.1.8.3. The remaining reference to Surveillance Requirement 4.6.1.8.2 assures that the proper cross-reference between the two TS exists. This change is simply an administrative revision to TS 4.6.1.2.i [and is an acceptable clarification to the Technical Specifications.]

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The 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 this amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, this 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 this amendment.

4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (54 FR 31118) on July 26, 1989 and consulted with the State of New Jersey. No public comments were received and the State of New Jersey did not have any comments.

The staff 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributor: C. Y. Shiraki

Dated: August 28, 1989