



## State of New Jersey

Department of Environmental Protection  
Division of Environmental Safety, Health,  
and Analytical Programs  
Bureau of Nuclear Engineering  
P.O.Box - 415  
Trenton, NJ 08625-0415

Robert C. Shinn, Jr.  
Commissioner

DONALD T. DiFRANCESCO  
Acting Governor

July 17, 2001

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555

Gentlemen:

Subject: Hope Creek Generating Station  
Docket No. 50-354  
Amendment to Facility Operating License  
License Change Request H00-01

The subject request was submitted to the NRC by PSEG letter dated October 12, 2001, and revised April 9, 2001. The request proposes to modify Technical Specification sections 3/4.3.6.2.1, 3.6.4.1, and 3.6.4.2 Containment System. The purpose of this request is to allow extended frequency of performing Surveillance Requirements of Vacuum Breakers, delete the operability requirements of Vacuum Breaker Position Indicator circuit, and relocate portions of the Technical Specifications to the Hope Creek Updated Final Safety Analysis Report (UFSAR).

The New Jersey Department of Environmental Protection's Bureau of Nuclear Engineering has reviewed the request in accordance with the requirements of 10CFR50.91 (b). The State of New Jersey has no the following comment.

Removing the operability requirements for vacuum breaker position indication in conjunction with doubling the required surveillance interval, increases the risk associated uncertainty in vacuum breaker position. PSEG's justification for doubling the surveillance interval is based on experience. We request that a more risk informed justification be provided. Many technical specification changes make use of the Standard Technical Specifications. This one is another important example of that trend. The continued piecemeal use of the Standard Technical Specifications raises the necessity for PSEG to convert to the Standard Technical Specifications. The NRC was encouraging licensees to adopt the Standard Technical Specifications. That approach seems to have changed in the last few years.

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If you have any questions, please contact Rich Pinney at (609) 984-7558.

Sincerely,

A handwritten signature in black ink that reads "Kent W. Tosch" with a stylized flourish at the end that includes the letters "KT".

Kent W. Tosch, Manager  
Bureau of Nuclear Engineering

c: Distribution

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