



State of New Jersey

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Department of Environmental Protection
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Robert C. Shinn, Jr.
Commissioner

September 14, 2001

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: Hope Creek Generating Station
Docket No. 50-354
License Change Request H01-02
Request to Eliminate the MSIV Seal System

PSEG requested a revision to the Technical Specifications for Hope Creek by letter to the NRC dated May 17, 2001. The proposed change will allow PSEG to eliminate the Main Steam Isolation Valve (MSIV) Sealing System and to increase the allowable leakage through the MSIVs.

If implemented the resulting change will create an unmonitored, unfiltered containment leakage pathway. By utilizing the alternate source term, recently approved by the NRC for use on a case by case basis, PSEG is able to show that the post accident release through this pathway and other pathways are within NRC limits.

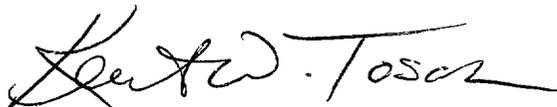
We are concerned that an unmonitored, unfiltered release pathway is being created by this change. We recognize that the resulting analysis show the post accident dose is within limits, however, we question the wisdom of NRC allowing elimination of design features that were intended to limit the release of fission products following an accident, while at the same time, encouraging states to consider implementing distribution of potassium iodide as a supplemental protective action from the release of fission products.

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In addition, enhancements to radiation monitoring systems have not been addressed. Finally, models used to calculate projected dose for decision making during emergency preparedness have not been altered to incorporate this unmonitored unfiltered ground level release pathway.

Your prompt response is requested. If you need to discuss the subject further, please contact Rich Pinney at (609) 984-7558.

Sincerely,

A handwritten signature in black ink, appearing to read "Kent W. Tosch". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kent W. Tosch, Manager
Bureau of Nuclear Engineering

Distribution

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