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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Gentlemen:

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING A
CHANGE TO TECHNICAL SPECIFICATIONS
MECHANICAL VACUUM PUMP TRIP INSTRUMENTATION
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354**

By letter dated November 12, 2002, the NRC requested additional information to facilitate completion of the staff's review of the request for license amendment submitted by PSEG Nuclear LLC (PSEG) on January 4, 2002 to add a Limiting Condition for Operation (LCO) for mechanical vacuum pump trip instrumentation. PSEG's response is provided in Attachment 1.

Per discussion with Mr. Robert Taylor of the NRC staff, this response is being submitted within 60 days of the NRC's written request.

PSEG has determined that the information contained in Attachment 1 does not alter the conclusions reached in the 10CFR50.92 no significant hazards analysis previously submitted.

Should you have any questions regarding this response, please contact Mr. Paul Duke at 856-339-1466.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Salamon", with a long horizontal flourish extending to the right.

G. Salamon
Manager – Nuclear Safety & Licensing

Attachment

A001

C Mr. H. J. Miller, Administrator - Region I
U. S. Nuclear Regulatory Commission
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U. S. Nuclear Regulatory Commission
ATTN: Mr. G. Wunder, Licensing Project Manager - Hope Creek
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USNRC Senior Resident Inspector - HC (X24)

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PO Box 415
Trenton, NJ 08625

**HOPE CREEK GENERATING STATION UNIT NO. 1
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
MECHANICAL VACUUM PUMP TRIP INSTRUMENTATION**

By letter dated November 12, 2002, the NRC requested additional information to facilitate completion of the staff's review of the request for license amendment submitted by PSEG Nuclear LLC (PSEG) on January 4, 2002 to add a Limiting Condition for Operation (LCO) for mechanical vacuum pump trip instrumentation. This attachment contains PSEG's response.

NRC Question:

The amendment request stated on page 5 of Attachment 1 that, "The 12 hour allowed outage time was shown to be acceptable in NEDC-30851P-A, Supplement 2" By letter dated January 6, 1989, (C.E. Rossi, Director, Division of Operational Events Assessment, to D.N. Grace, BWR Owners Group) the NRC stated that for plant-specific applications of NEDC-30851P-A, Supplement 2, the licensee must:

- (1) Confirm the applicability of the generic analysis to the plant.

PSEG Response:

As noted in Appendix A to NEDC-30851P-A, Supplement 2, Hope Creek was a participating plant in the BWR Owners' Group Technical Specification Improvement analyses conducted for isolation instrumentation. Upon issuance, PSEG reviewed NEDC-30851P-A, Supplement 2, and concluded the generic analysis is applicable to Hope Creek.

NRC Question:

- (2) Confirm that any increase in instrument drift due to the extended surveillance test intervals (STIs) is properly accounted for in the setpoint calculation methodology. (For additional information on this issue, see letter from C. E. Rossi to R. F. Janecek, dated April 27, 1988).

PSEG Response:

The proposed STIs for the CHANNEL FUNCTIONAL TEST and the CHANNEL CALIBRATION are consistent with those previously approved for the main steam line radiation - high, high function in Technical Specification Amendment 70 (TAC No. M88064). The loop setpoint calculation is based on an eighteen month calibration interval. Therefore, the instrument drift for the proposed STIs is bounded by the allowance for drift in the current setpoint calculation.

NRC Question:

Additionally, your amendment request stated on page 6 of Attachment 1 that the nominal trip setpoint is specified in setpoint calculations. The NRC staff requests that you provide the details of the setpoint calculation methodology or demonstrate that the setpoint calculation methodology has been approved by the NRC in the past.

PSEG Response:

The current setpoint calculation for main steam line radiation – high, high function calculates the total loop allowance (including loop accuracy, drift, and calibration error) following the guidelines described in Instrument Society of America Standard ISA-S67.04, 1982, "Setpoints for Nuclear Safety-Related Instrumentation Used in Nuclear Power Plants." In Regulatory Guide 1.105, Rev. 2 (the revision current when the calculation was performed), the NRC endorsed ISA-S67.04-1982 as establishing acceptable requirements for ensuring that instrument setpoints are initially within and remain within the Technical Specification limits.