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United States Nuclear Regulatory Commission
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Washington, DC 20555-001



**INSERVICE INSPECTION PROGRAM
RELIEF REQUEST HC-RR-A02
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSES NPF-57
DOCKET NOS. 50-354**

Pursuant to 10 CFR 50.55a(a)(3)(i), PSEG Nuclear, LLC requests relief to incorporate the alternate examination requirements of ASME Code Case N-598, *Alternative Requirements to Required Percentages of Examinations, Section XI Division 1*, to determine the required percentage of examinations each inspection period for Class 1, 2, and 3 components and associated component supports at Hope Creek.

The attachment to this letter includes the proposed alternative and supporting justification for the relief. Based on the evaluation contained in the attachment, PSEG Nuclear has concluded that the proposed alternative provides an acceptable level of quality and safety. Accordingly, this proposal satisfies the requirements of 10 CFR 50.55a(a)(3)(i).

This relief request is applicable to PSEG Nuclear LLC Hope Creek Generating Station. PSEG Nuclear requests that the NRC approve this request by April 2003 in order to support Hope Creek refueling outage RFO11 scheduled to commence April 12, 2003. Similar relief has been granted for Salem Units 1 and 2 [Docket Numbers 50-272 and 50-311 via approved TAC numbers MB6086 and MB6087, respectively, dated October 4, 2002].

Should you have any questions regarding this request, please contact Mr. Howard Berrick at 856-339-1862.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Salamon".

G. Salamon
Manager – Nuclear Safety and Licensing

Attachment:
ISI Relief Request HC-RR-A02

A047

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1. **ASME Code Component(s) Affected**
ASME Section XI Class 1, 2, 3 component and their component supports.
2. **Applicable Code Edition and Addenda**
The code of record for Hope Creek ISI Program is Section XI of the ASME Code, 1989 Edition.
3. **Applicable Code Requirement**
For Hope Creek, ASME XI 1986 Edition subparagraphs IWB-2412, IWC-2412, IWD-2412, IWF-2410; and Tables IWB IWB-2412-1, IWC-2412-1, IWD-2412-1 and Table -2410-2 of Code Case N-491-1 require approximately one-third of the Code examinations be performed each inspection period and that 100 percent of the examinations be completed each inspection interval.
4. **Proposed Alternative**
PSEG Nuclear, LLC proposes to fully implement the alternative requirements of Code Case N-598 for Class 1, 2, and 3 components, and their associated Component Supports.
5. **Basis of Alternative for Providing Acceptable Level of Quality and Safety**
Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative provides an acceptable level of quality and safety.

PSEG Nuclear, LLC requests relief to incorporate the alternate examination requirements of ASME Code Case N-598, titled 'Alternative Requirements to Required Percentages of Examinations, Section XI Division 1', to determine the required percentage of examinations each inspection period for Class 1, 2, and 3 components and associated component supports at Hope Creek.

Although Code Case N-598 also addresses Class MC components, relief is not being requested for scheduling of Class MC components in this Request for Alternative.

The ASME Code tables referenced above were originally established such that approximately one third of the non-deferred examinations would be performed each period. Over the past 20 years, it has become increasingly more difficult to meet these percentages. The emergence of longer fuel cycles increases the likelihood that one of the periods will only have one refueling outage in it. In addition, efforts to shorten refueling outages have limited the amount of time available to perform examinations. These factors have made it difficult to complete the Code required percentages of examinations in the allotted time.

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Code Case N-598 was developed to address this issue. It expands the range of examination completion percentages to allow examinations to be distributed more evenly between outages. This minimizes the need to schedule an excessive number of examinations during one outage just to meet the percentages required by ASME, Section XI, Tables IWB-2412-1, IWC-2412-1, IWD-2412-1, and IWF-2410-2 (-2410-2). In addition, Code Case N-598 allows for a more uniform distribution between outages that is more conducive to performing quality examinations.

During the development of Code Case N-598, two additional factors were considered when evaluating the impact of the Code Case on plant safety. The first was that the existing tables allow up to 50 percent of the examinations to be performed in the second and third periods, but only 34 percent can be performed in the first period. Therefore, the Inspection Plan B schedule is biased towards delaying examinations until the end of the interval. The more flexible percentages stated in Code Case N-598 allow for more examinations to be performed earlier in the interval. This should improve safety because any problems, should they exist, would be detected earlier in the interval.

The second factor that was considered when developing Code Case N-598 was that some minimum amount of examinations should be required in each period. To address this consideration, the Code Case, including Note (1), is structured such that examinations will be required during all three periods. Due to the factors documented above, PSEG Nuclear, LLC considers that the alternative criteria of Code Case N-598 provide an acceptable, or improved, level of quality and safety during the Second Ten-Year Inspection Interval at Hope Creek

Granting the proposed alternative will provide an acceptable level of quality and safety, and will not adversely impact the health and safety of the public.

6. Duration of Proposed Alternative

Proposed alternative relief is requested for the duration of the second ten-year ISI interval at Hope Creek. The use of the Code Case is requested until the NRC publishes the Code Case in a future revision of the applicable Regulatory Guide.

7. Precedents

Previous relief has been granted for Salem Units 1 and 2 [Docket Numbers 50-272 and 50-311 via approved TAC numbers MB6086 and MB6087, respectively, dated October 4, 2002].

8. References

None

Proposed Alternative In Accordance with 10 CFR 50.55a(a)(3)(i)
-- Alternative Provides Acceptable Level of Quality and Safety --