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United States Nuclear Regulatory Commission
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Washington, DC 20555-001



**INSERVICE INSPECTION PROGRAM
RELIEF REQUEST HC-RR-F02
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 proposes to implement the alternative requirements of Code paragraphs IWF-3112.3 and IWF-3122.3 from the 1995 Edition, including the 1997 Addenda of Section XI for component supports. Currently, sub-paragraphs –3112.3 and –3122.3 of Code Case N-491-2 provide requirements for acceptance of a component support or a portion of a component support by evaluation or test.

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 MB6099 and MB6100, respectively, dated October 30, 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", written over a horizontal line.

G. Salamon
Manager – Nuclear Safety and Licensing

Attachment:
ISI Relief Request HC-RR-F02

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C Mr. H. Miller, Administrator
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USNRC Senior Resident Inspector – Hope Creek (X24)

Mr. K. Tosch, Manager IV
Bureau of Nuclear Engineering
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1. **ASME Code Component(s) Affected**
ASME Section XI Class 1, 2, 3 and MC 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, sub-paragraphs –3112.3 and –3122.3 of Code Case N-491-2 provide requirements for acceptance of a component support or a portion of a component support by evaluation or test.
4. **Proposed Alternative**
PSEG Nuclear, LLC proposes to implement the alternative requirements of Code paragraphs IWF-3112.3 and IWF-3122.3 from the 1995 Edition, including the 1997 Addenda of Section XI for 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 to use Sub-paragraphs IWF-3112.3 and IWF-3122.3 from the 1995 Edition, including the 1997 Addenda of Section XI. The 1997 Addenda incorporated revisions to these paragraphs as was shown within sub-paragraphs –3112.3 and –3122.3 of Code Case N-491-2.

Under the requirements of Sub-paragraphs IWF-3112.3 and IWF-3122.3 of the 1995 Edition, including the 1996 Addenda of Section XI, and similar paragraphs within the above quoted Code Cases; examination results that exceed the acceptance standards of IWF-3410 are initially considered to be unacceptable for service, but may be accepted without performing corrective measures based on an analysis and/or test to substantiate its integrity for continued service. However, if the owner optionally elects to perform the corrective measures of IWF-3112.2 or IWF-3122.2, re-examination requirements of IWF-2220 are then required.

The requirement to perform re-examination of acceptable component supports that are optionally adjusted or have a repair/replacement activity performed to restore the component support to its original design condition is unnecessary.

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

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The re-examination following these corrective measures on acceptable supports requires expenditure of visual examiner resources, potentially incur additional radiation dose, and potentially require additional critical path duration without a compensating increase in quality or safety.

In the 1997 Addenda, sub-paragraphs IWF-3112.3 and IWF-3122.3 were revised to clarify that corrective measures may be performed on a component support to return the support to its original design condition, after acceptance by an evaluation or test, without additionally requiring the re-examinations of IWF-2220.

This revision provides a realistic approach to the inspection of component supports. Examination results that exceed the acceptance standards of IWF-3410 are first evaluated or tested to determine whether the component support is acceptable for service. This is similar to an operability determination. If the component support is determined to be acceptable for service, no corrective measures are required. However, if PSEG Nuclear, LLC optionally elects to perform corrective measures in order to return the component support to its original design condition, the additional re-examination requirements of IWF-2220 are not required.

All related requirements will be met, because these revisions to sub-paragraphs IWF-3112.3 and IWF-3122.3 are the only revisions to Subsection IWF in the 1997 Addenda. All other provisions of Article IWF remain identical to the 1995 Edition, including the 1996 Addenda of Section XI.

This revision to the Code, therefore, has the net effect of encouraging the owner to perform corrective measures on degraded but acceptable component supports.

Based on the alternative requirements of sub-paragraphs IWF-3112.3 and IWF-3122.3 in the 1997 Addenda there is reasonable assurance of continued structural integrity, and an acceptable level of quality and safety will be maintained during the Second Inspection Interval.

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. The use of the Code Case is requested until the NRC publishes the Code Case in a future revision of the applicable Regulatory Guide.

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

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7. Precedents

Previous relief has been granted for Salem Units 1 and 2 [Docket Numbers 50-272 and 50-311 via approved TAC numbers MB6099 and MB6100, respectively, dated October 30, 2002].

8. References

None.