

March 17, 2003

Mr. Harold W. Keiser  
Chief Nuclear Officer & President  
PSEG Nuclear LLC-X04  
Post Office Box 236  
Hancocks Bridge, NJ 08038

SUBJECT: HOPE CREEK GENERATING STATION - ISSUANCE OF AMENDMENT RE:  
EMERGENCY DIESEL GENERATOR (TAC NO. MB6084)

Dear Mr. Keiser:

The Commission has issued the enclosed Amendment No. 144 to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated August 20, 2002. The amendment modifies the diesel generator action statements and surveillance requirements defined in the plant's TSs, in order to reduce degradation of the diesel generators associated with fast starting and rapid loading.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

*/RA/*

George F. Wunder, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosures: 1. Amendment No. 144 to  
License No. NPF-57  
2. Safety Evaluation

cc w/encls: See next page

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**Package No.: ML030780683**

**TS Pages No.: ML030770799**

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\* Provided Hope Creek is a GDC plant

\*\* Safety Evaluation dated December 23, 2002

\*\*\* See previous concurrence NRR-058

OFFICE	PD1-2/PM	PD1-2/LA	EEIB/SC **	OGC *	PD1-2/SC	PD1-2/SC
NAME	GWunder	CRaynor	CHolden ***	RWeisman ***	JBoska for JClifford	RDennig
DATE	03/13/03	3-13-03	12/23/02	4 March 2003	3-14-03	3/14/2003

DOCUMENT NAME: G:\PD1-2\Hope Creek\amdb6084.wpd

OFFICIAL RECORD COPY

Hope Creek Generating Station

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Hancocks Bridge, NJ 08038

PSEG NUCLEAR LLC

DOCKET NO. 50-354

HOPE CREEK GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 144  
License No. NPF-57

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by PSEG Nuclear LLC on August 20, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-57 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 144, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated into the license. PSEG Nuclear LLC shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA by John P. Boska for/*

James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical  
Specifications

Date of Issuance: March 17, 2003

ATTACHMENT TO LICENSE AMENDMENT NO. 144

FACILITY OPERATING LICENSE NO. NPF-57

DOCKET NO. 50-354

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

3/4 8-1  
3/4 8-2  
3/4 8-3  
3/4 8-4  
3/4 8-6  
3/4 8-7  
3/4 8-9

Insert

3/4 8-1  
3/4 8-2  
3/4 8-3  
3/4 8-4  
3/4 8-6  
3/4 8-7  
3/4 8-9

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 144 TO FACILITY OPERATING LICENSE NO. NPF-57

PSEG NUCLEAR LLC

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

## 1.0 INTRODUCTION

By letter dated August 20, 2002, PSEG Nuclear, LLC (the licensee), submitted a request for an amendment to modify the Technical Specifications (TSs) associated with NPF-57 for Hope Creek Generating Station. The proposed changes would modify the diesel generator action statements and surveillance requirements (SRs) defined in the plant's TSs, in order to reduce degradation of the diesel generators associated with fast starting and rapid loading. In its request, the licensee states that change to the TS requirements for inoperable diesel generators will permit operating personnel to increase their focus on implementing corrective action for the inoperable diesel generators. According to the licensee, the requested changes to the voltage and load ranges for diesel generator surveillance testing will reduce the burden on plant personnel performing the tests. The licensee also proposes other changes to clarify and eliminate duplication in TS requirements and to ensure consistency with the plant's current design basis. The proposed changes are consistent with NUREG-1433, "Standard Technical Specifications - General Electric Plants, BWR/4," Revision 2, and with Regulatory Guide (RG) 1.9, "Selection, Design, Qualification and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants," Revision 3.

## 2.0 REGULATORY EVALUATION

General Design Criterion (GDC) 17, "Electric Power System," of Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10, Part 50, of the Code of Federal Regulation (10 CFR Part 50) requires, in part, that nuclear power plants must have both onsite and offsite electric power systems to permit the functioning of structures, systems and components that are important to safety. The onsite power supplies are required to have sufficient independence, redundancy, and testability to perform their safety functions, assuming a single failure, and electric power from the offsite transmission network is required to be supplied by two physically independent circuits. In addition, this criterion requires provisions to minimize the probability of losing electric power from the remaining electric power supplies as the result of a loss of power from the unit, the offsite transmission network, or the onsite power supplies. GDC-18, "Inspection and Testing of Electric Power System," requires, in part, that electric power systems important to safety must be designed to permit appropriate periodic inspection and testing.

As described in the licensee's amendment application, dated August 20, 2002, the standby alternating current power source for Hope Creek Generating Station consists of four separate and independent diesel generators. The sizing of these standby diesel generators and the loads assigned among them is such that any combination of three out of four of the diesel generators is capable of shutting down the plant safely, maintaining the plant in a safe shutdown condition, and mitigating the consequences of accident conditions. Each generator is driven by a Colt-Pielstick PC 2.3V 12-cylinder engine. Each diesel generator is rated at 4,430 kW for continuous operation and at 4,873 kW for 2 hours of short-term operation in any 24-hour period. Each generator is connected exclusively to its dedicated 4.16-KV Class 1E bus. Each of the four Class 1E power supply channels feeds loads in its own dedicated load group. The four diesel generators are completely independent. Their mechanical and electrical systems are designed so that a single failure affects the operation of only one diesel generator.

### 3.0 TECHNICAL EVALUATION

#### 3.1 TS 3.8.1.1, Actions b, c, e, and g

The licensee proposes to modified TS 3.8.1.1, Actions b, c, e, and g, to eliminate the requirement to perform SR 4.8.1.1.2.a.5 (1-hour load-run test) when demonstrating the operability of the remaining diesel generators with one or two inoperable diesel generators. Under such circumstances, the licensee would continue to perform SR 4.8.1.1.7.a.4. The licensee states that this change would reduce the burden on operating personnel associated with synchronizing, loading, unloading, and cooling each operable generator. This would permit operating personnel to increase their focus on implementing corrective actions for the inoperable diesel generators.

The staff finds that when the absence of any potential common mode failure has not been demonstrated, satisfactory performance of SR 4.8.1.1.2.a.4 (start from standby conditions) would be sufficient to demonstrate operability of each of the remaining diesel generators. In addition, the proposed change would reduce the unnecessary burden on the licensee. Therefore, the proposed change is acceptable. In addition, the proposed change is consistent with NUREG-1433.

#### 3.2 TS 3.8.1.1, Action b

This limiting condition of operation (LCO) currently requires, in part, that with one diesel generator inoperable, the license must demonstrate the operability of the remaining diesel generators within 16 hours. The licensee proposes to extend the time for demonstrating operability of the remaining diesel generators from 16 hours to 24 hours. The licensee states that this change would provide additional time to determine the cause of the inoperability and would further reduce the number of unnecessary tests and the associated wear and stress on operable diesel generators. The staff finds that the proposed change is consistent with the guidance in Generic Letter (GL) 84-15, "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability," and would reduce unnecessary diesel generator starts and, therefore, is acceptable. In addition, the proposed change is consistent with NUREG-1433.

#### 3.3 TS 3.8.1.1, Actions e and g

The licensee proposes to modify TS 3.8.1.1, Actions e and g, to eliminate the requirement to test the remaining operable diesel generators when two diesel generators became inoperable



as a result of an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, or when the absence of any potential common mode failure for the remaining diesel generators is demonstrated. The licensee states that the proposed change would eliminate unnecessary diesel generator starts when the cause of inoperability is known and there is no common mode failure, and would permit operating personnel to increase their focus on implementing corrective actions for the inoperable diesel generators. The requirement to restore at least one of the two inoperable diesel generators to operable status within 2 hours would not be changed. The staff finds that the proposed change is consistent with the guidance provided in Generic Letter (GL) 84-15 "Proposed Staff Actions to Improve and Maintain Diesel Generator Reliability" and would reduce unnecessary diesel generator starts and, therefore, is acceptable. In addition, the proposed change is consistent with NUREG-1433.

### 3.4 Changes to the Diesel Generator Start Surveillance Requirement

- a. SR 4.8.1.1.2.a.4 currently requires verification at least once per 31 days that each diesel generator starts from standby conditions and achieves the minimum required voltage and frequency within 10 seconds after receiving the start signal. The licensee proposes to delete the start time constraint and the start signal requirements for the monthly surveillance start test. In making this change, the licensee proposes to add a footnote to SR 4.8.1.1.2.a.4 to state that a modified start involving idling and gradual acceleration to synchronous speed may be used for this SR and that, when modified start procedures are not used, the time, voltage and frequency of SR 4.8.1.1.2.g must be met.
- b. The licensee proposes to add a new SR 4.8.1.1.2.g to verify at least once per 184 days that each diesel starts and achieves the minimum required voltage and frequency within the required time and subsequently achieves the required steady-state voltage and frequency.

Deleting the start time constraint and adding a modified start involving idling and gradual acceleration to synchronous speed would significantly reduce the amount of stress and wear on the diesel generators. Regulatory Guide 1.9, Revision 3, states that, for the monthly start test, the diesel generator can be slow-started and reach rated speed on a prescribed schedule to minimize stress and wear. It also recommends that the "fast-start test" which verifies that the diesel generator reaches the required voltage and frequency within the required time should be performed once every 184 days. Limiting the fast-starts to a 184-day frequency instead of once every month would significantly reduce the amount of stress and wear on the diesel generators and their components and systems. The staff finds that the proposed changes are consistent with RG 1.9, Revision 3, and would reduce diesel generator stress and wear, and, therefore, are acceptable. In addition, the proposed changes are consistent with NUREG-1433.

### 3.5 Proposed Changes to the Minimum Steady-State Voltage Criterion in SRs 4.8.1.1.2.a.4, 4.8.1.1.2.h.2, 4.8.1.1.2.h.4.b, 4.8.1.1.2.h.5, 4.8.1.1.2.h.6.b, 4.8.1.1.2.k.1, and 4.8.1.1.2.k.2

The licensee proposes to change the steady-state voltage criterion in SRs 4.8.1.1.2.a.4, 4.8.1.1.2.h.2, 4.8.1.1.2.h.4.b, 4.8.1.1.2.h.5, 4.8.1.1.2.h.6.b, 4.8.1.1.2.k.1, and 4.8.1.1.2.k.2 from  $4,160 \pm 420$  volts to a range between 3,828 and 4,580 volts. The licensee's voltage analysis performed in accordance with Branch Technical Position PSB-1, "Adequacy of Station Electric

Distribution System Voltages,” Revision 0, July 1981, confirmed that the onsite distribution system voltages are adequate to support Class 1E loads within the equipment ratings, and setting the undervoltage relays on the source side of the incoming offsite source breakers on the Class 1E 4.16 kV buses will protect Class 1E loads from degraded voltages resulting from a sustained low offsite system voltage condition. The licensee has determined that the degraded voltage must be 0.92 per unit in order to maintain acceptable voltage on downstream buses. Therefore, the undervoltage relays are set at 0.92 per unit of 4.16 kV with sufficient time delay to ensure that automatic bus transfer does not occur on transient undervoltage conditions.

The current minimum voltage acceptance criterion in SRs 4.8.1.1.2.a.4, 4.8.1.1.2.h.2, 4.8.1.1.2.h.4.b, 4.8.1.1.2.h.5, 4.8.1.1.2.h.6.b, 4.8.1.1.2.k.1, and 4.8.1.1.2.k.2 is 3,740 volts, which is less than the minimum acceptable voltage calculated in the degraded voltage analysis. The licensee states that its review of recent test data indicates that the actual steady-state voltage is greater than or equal to 4,100 volts. Therefore, the proposed minimum steady-state voltage of 3,828 volts is readily achievable. The staff finds that the proposed change of the minimum voltage to 3,828 volts is consistent with the minimum acceptable voltage calculated in degraded voltage analysis and, therefore, is acceptable.

### 3.6 Changes to Diesel Generator Loading Criteria

- a. The licensee proposes to change the minimum diesel generator loading criterion in SRs 4.8.1.1.2.a.5, 4.8.1.1.2.k.1, and 4.4.1.1.2.k.2 from 4,300 kW to 4,000 kW. In making this change, the licensee also proposes to revise the footnotes to the SRs on pages 3/4 8-4 and 3/4 8-9 to be consistent with NUREG-1433.
- b. For the 2-hour margin test, the licensee proposes to change the minimum diesel generator loading criterion in SR 4.8.1.1.2.k.1 from 4,800 kW to 4,652 kW.

SR 4.8.1.1.2.a.5 currently requires that each diesel generator must be loaded to between 4,300 and 4,400 kW for 1 hour at least once per month. Diesel generator loading for the test is accomplished by synchronizing the generator with the offsite power source. The footnotes on pages 3/4 8-4 and 3/4 8-9 explain that the band is meant as guidance to avoid routine overloading of the engine. Loads in excess of this band shall not invalidate the test; however, the load shall not be less than 4,300 kW. The licensee proposes to change the lower limit in SR 4.8.1.1.2.a.5 from 4,300 kW to 4,000 kW. The licensee also proposes to change the footnote on pages 3/4 8-4 and 3/4 8-9 to state that momentary transients outside the load range do not invalidate this test. The licensee states that changing the lower limit in SR 4.8.1.1.2.a.5 from 4,300 kW to 4,000 kW (90.2% of the continuous rating) will reduce the burden on plant personnel performing the test, while maintaining the effectiveness of the SR.

The currently specified range of 4,300 to 4,400 kW is equivalent to 97.1% to 99.3% of the continuous rating of 4,430 kW. Thus, the current SR is more restrictive than the guidance in RG 1.9, Revision 3, Section 2.2.2 which permits the diesel generator to be loaded to between 90% and 100% of the continuous rating for the monthly load test. The relatively narrow range load limits in the footnotes are unnecessary. The proposed changes to the footnotes to SR 4.8.1.1.2.a.5 and SR 4.8.1.1.2.k.1 on pages 3/4 8-4 and 3/4 8-9 are consistent with NUREG-1433 and are considered administrative in nature. The staff finds that the proposed changes to the lower limit in SR 4.8.1.1.2.a.5 is consistent with RG 1.9, Revision 3, and testing at the proposed minimum load would continue to demonstrate the diesel generators' operability, and, therefore, is acceptable.

SR 4.8.1.1.2.k.1 requires that the licensee must perform an endurance test for each diesel generator once per refueling cycle. For the first 22 hours of the test, the diesel generator is currently required to be loaded between 4,300 kW and 4,400 kW, which is equivalent to 97.1% to 99.3% of the continuous rating of 4,430 kW. For the remaining 2 hours of the test, the diesel generator is required to be loaded to between 4,800 kW and 4,873 kW, which is equivalent to 108.3% to 110% of the continuous rating of 4,430 kW. Diesel generator loading for this test is accomplished by synchronizing the generator with the offsite power source. The licensee states that operation in this mode within the relatively narrow load ranges currently required by SR 4.8.1.1.2.k.1 requires close operator attention for the duration of the test. The licensee, therefore, proposes to change the lower load limit for the first 22 hours from 4,300 kW to 4,000 kW (90.2% of continuous rating) and the lower limit for the remaining 2 hours from 4,800 kW to 4,652 kW (105% of the continuous rating).

The current requirements are more restrictive than the guidance in RG 1.9, Revision 3, Section 2.2.9. For the endurance and margin test, RG 1.9 permits the diesel generator to be tested for 2 hours at a load equal to 105% to 110% of the continuous rating and for 22 hours at a load, equal to 90% to 100% of the continuous rating. The staff finds that proposed change to the lower limit in SR 4.8.1.1.2.k.1 is consistent with RG 1.9, will reduce the burden on the licensee, and will continue to demonstrate diesel generator operability with respect to endurance and margin, and, therefore, is acceptable.

The hot restart test (SR 4.8.1.1.2.k.2) may be performed either within 5 minutes of completing the 24-hour endurance test or within 5 minutes of shutting down the diesel generator after operation for 2 hours between 4,300 kW and 4,400 kW. Similar to the discussion above for SRs 4.8.1.1.2.a.5 and 4.8.1.1.2.k.1, the relatively narrow range currently specified in SR 4.8.1.1.2.k.2 represents an operational burden on the licensee unnecessary for demonstrating operability in this regard. Consequently, as previously discussed, the staff finds that changing the lower limit of this range from 4,300 kW to 4,000 kW is acceptable.

### 3.7 Deleting the Fast-Loading Requirement in SR 4.8.1.1.2.a.5

SR 4.8.1.1.2.a.5 currently requires, in part, that at least once per 31 days, the licensee must verify that the diesel generator is synchronized, and loaded to between 4,300 kW and 4,400 kW in less than or equal to 130 seconds. The licensee proposes to delete the fast-loading requirement in SR 4.8.1.1.2.a.5. The licensee also proposes to revise the footnote to SR 4.8.1.1.2 on page 3/4 8-4 to reflect this change.

Fast-loading is identified as the most significant cause of accelerated degradation of diesel generators because it can cause rapid piston ring and cylinder liner wear. In GL 84-15, the staff stated that it has determined that many licensees use a method of testing that does not consider those manufacturer-recommended preparatory actions (such as prelubrication of all moving parts and warmup procedures) that are necessary to reduce engine wear, extend life, and improve availability. The existing TSs require fast starts from ambient conditions for all surveillance testing, which, in many engine designs and operating practices, subject the diesel engine to undue wear and stress on engine parts. The staff finds that the proposed changes are consistent with GL 84-15 and would avoid undue wear and stress on the diesels, and, therefore, are acceptable. In addition, the proposed changes are consistent with NUREG-1433.

### 3.8 Deleting KW Value in SR 4.8.1.1.2.h.2

The licensee currently performs SR 4.8.1.1.2.h.2 at least once every 18 months during shutdown to verify each diesel generator's capability to reject a load of greater than or equal to that of the residual heat removal (RHR) pump motor (1,003 kW) while maintaining voltage and frequency within the required range. The licensee proposes to delete the kW value for the RHR pump motor.

While the RHR pump motor is the largest single post-accident load for each diesel generator, 1,003 kW is a design value that does not correspond to the load required when the RHR pump is operating at the design-basis flow and differential pressure conditions. Under design-basis condition, the actual RHR pump motor load is less than 1,003 kW. The motor loading rating is not part of the verification performed during the surveillance test. Deleting the parenthetical load rating for the RHR pump motor does not change the manner in which the test is performed. Therefore, the staff find that the proposed change is administrative in nature and is acceptable. In addition, the proposed change is consistent with SR 3.8.1.9 in the NUREG-1433, Revision 2.

### 3.9 Editorial Changes

The licensee proposes the following changes to correct typographical errors or eliminate duplication in TS requirements:

1. The footnote to TS 3.8.1.1, Action c, on page 3/4 8-2 contains an unnecessary comma after the word "restored."
2. "Verify" should be changed to "Verifying" in SR 4.8.1.1.2.a.4.
3. The footnote to SR 4.8.1.1.2.h.4.b on page 3/4 8-6 is redundant to the footnote to SR 4.8.1.1.2 on page 3/4 8-4 and can be deleted without affecting the SR.
4. The footnote to SR 4.8.1.1.2.h.6.b on page 3/4 8-7 is redundant to the footnote to SR 4.8.1.1.2 on page 3/4 8-4 and can be deleted without affecting the SR.
5. TS 3.8.1.1, Actions d and e, referred to SRs 4.8.1.1.2.a.4 and 4.8.1.1.2.a.5 as satisfying the diesel generator test requirements of Action a. However, Hope Creek Generation Station TS Amendment No. 72 (TAC Nos. M89219 and M90272) removed the requirement in Action a to perform diesel generator testing when an offsite power circuit becomes inoperable. Incorrect references to diesel generator test requirements in TS 3.8.1.1 Actions d and e would be deleted.

The staff finds that the proposed editorial changes are acceptable.

### 3.10 Summary

The staff finds that the proposed changes meet the guidance of GL 84-15 and are consistent with RG 1.9, Revision 3, and NUREG-1433, and would reduce unnecessary wear and stress on the diesel generators while continuing to provide appropriate demonstrations of operability. The

staff, therefore, concludes that the Hope Creek Generating Station continues to meet the requirements of GDC-17 and, the proposed changes are acceptable.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State Official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (67 FR 61684). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: D. Nguyen

Date: