PSEG Nuclear LLC
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MAR 1 3 2003

PSEG Nuclear LLC

LR-N03-0050
LCR H02-011

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
POST ACCIDENT SAMPLING
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354

Pursuant to 10 CFR 50.90, PSEG Nuclear LLC (PSEG) hereby requests a revision to the Technical Specifications for the Hope Creek Generating Station.

The proposed amendment would delete Technical Specification (TS) 6.8.4.c, "Post Accident Sampling," and thereby eliminate the requirements to have and maintain the post accident sampling station at Hope Creek. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the *Federal Register* on March 20, 2002 as part of the consolidated line item improvement process (CLIIP).

PSEG has evaluated the proposed changes in accordance with 10CFR50.91(a)(1), using the criteria in 10CFR50.92(c), and has determined this request involves no significant hazards considerations. Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides revised clean technical specification pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal.

In accordance with 10CFR50.91(b)(1), a copy of this submittal has been sent to the State of New Jersey.

PSEG requests approval of the proposed License Amendment by December 30, 2003, with the amendment being implemented within 180 days after approval.

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If you should have any questions regarding this submittal, please contact Mr. Michael Mosier at 856-339-5434.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 13, 2003

Sincerely,

Timothy J. O'Connor
Vice President - Operations

Attachments (4)

MAR 1 3 2003

C Mr. H. J. Miller, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. George Wunder, Project Manager – Hope Creek
U. S. Nuclear Regulatory Commission
Mail Stop 08B1
Washington, DC 20555-0001

USNRC Senior Resident Inspector - HC (X24)

Mr. K. Tosch, Manager IV
Bureau of Nuclear Engineering
PO Box 415
Trenton, NJ 08625

Attachment 1

Description and Assessment

1.0 DESCRIPTION

The proposed License amendment deletes the program requirements of Technical Specification (TS) 6.8.4.c, "Post Accident Sampling."

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-413. The availability of this technical specification improvement was announced in the *Federal Register* on March 20, 2002 as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

PSEG has reviewed the safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. This verification included a review of the NRC staff's evaluation (as modified slightly by the notice of availability) as well as the supporting information provided to support TSTF-413 (i.e., NEDO-32991, "Regulatory Relaxation for BWR Post Accident Sampling Stations (PASS)," submitted November 30, 2000, and the associated NRC safety evaluation dated June 12, 2001). PSEG has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to Hope Creek and justify this amendment for the incorporation of the changes to the Hope Creek Technical Specifications.

2.2 Optional Changes and Variations

PSEG is not proposing any variations or deviations from the technical specification changes described in TSTF-413 or the NRC staff's model safety evaluation published on December 27, 2001.

The Hope Creek TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. PASS is specifically listed in TS 6.8.4.a as falling under the scope of this requirement. As described in the staff's model safety evaluation published on December 27, 2001, PSEG is proposing to maintain the PASS isolation valves fully functional, and therefore, it will continue to be a potential leakage path outside containment for highly radioactive fluids (e.g., the PASS piping will penetrate the containment with valves or other components in the system from which highly radioactive fluid could leak). Therefore, no changes to TS 6.8.4.a are being requested.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

PSEG has reviewed the proposed no significant hazards consideration determination published on December 27, 2001 (66 FR 66949) as part of the CLIIP. PSEG has concluded that the proposed determination presented in the notice is applicable to Hope Creek and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the model SE published in Federal Register on December 27, 2001 for this technical specification improvement, plant-specific verifications were performed as follows:

1. PSEG is making a regulatory commitment to develop contingency plans for obtaining and analyzing highly radioactive samples from the RCS, suppression pool, and containment atmosphere. The contingency plans will be contained in plant procedures and implementation will be completed within 180 days after the implementation of the License amendment. Establishment and maintenance of contingency plans is considered a regulatory commitment.

2. The capability for classifying fuel damage events at the Alert level threshold has been established for Hope Creek at radioactivity levels of 300 mCi/cc dose equivalent iodine. This capability is described in plant implementing procedures and implementation is complete. The capability for classifying fuel damage events is considered a regulatory commitment.

3. PSEG verified that it has an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines will be maintained within plant implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

PSEG has reviewed the environmental evaluation included in the model safety evaluation published on December 27, 2001 (66 FR 66949) as part of the CLIIP. PSEG has concluded that the staff's findings presented in that evaluation are applicable to Hope Creek and the evaluation is hereby incorporated by reference for this application.

Attachment 2

HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354
REVISIONS TO THE TECHNICAL SPECIFICATIONS

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK UP)

The following Technical Specifications for Facility Operating License No. NPF-57 are affected by this change request:

Technical Specification	Page
6.8.4.c	6-16

PROCEDURES AND PROGRAMS (Continued)

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the HPCI, CS, RHR, RCIC, Containment Hydrogen Recombiner, H2/02 analyzer, Post-Accident Sampling, Control Rod Drive Hydraulic (Scram Discharge portion) systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and

2. A service pressure leak test for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

c. Post-accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions.

The program shall include the following:

1. Training of personnel,

2. Procedures for sampling and analysis, and

3. Provisions for maintenance of sampling and analysis equipment.

c. Deleted

Attachment 3

HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354
REVISIONS TO THE TECHNICAL SPECIFICATIONS

PROPOSED TECHNICAL SPECIFICATION PAGES

The following Technical Specifications for Facility Operating License No. NPF-57 are affected by this change request:

Technical Specification	Page
6.8.4.c	6-16

PROCEDURES AND PROGRAMS (Continued)

6.8.4 The following programs shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the HPCI, CS, RHR, RCIC, Containment Hydrogen Recombiner, H2/02 analyzer, Post-Accident Sampling, Control Rod Drive Hydraulic (Scram Discharge portion) systems. The program shall include the following:

1. Preventive maintenance and periodic visual inspection requirements, and

2. A service pressure leak test for each system at refueling cycle intervals or less.

b. In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

c. Deleted

Attachment 4

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by PSEG in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

REGULATORY COMMITMENTS	Due Date/Event
PSEG is making a regulatory commitment to develop contingency plans for obtaining and analyzing highly radioactive samples from the RCS, suppression pool, and containment atmosphere. The contingency plans will be contained in appropriate plant procedures and will be completed within 180 days after the implementation of the License amendment. Establishment and maintenance of contingency plans is considered a regulatory commitment.	Implemented within 180 days of implementation of amendment.
The capability for classifying fuel damage events at the Alert level threshold has been established for Hope Creek at radioactivity levels of 300 μCi/cc dose equivalent iodine. This capability will be described in plant implementing procedures and implementation is complete. The capability for classifying fuel damage events is considered a regulatory commitment.	Complete
PSEG verified that it has an I-131 site survey detection capability, including an ability to assess radioactive iodines released to offsite environs, by using effluent monitoring systems or portable sampling equipment. The capability for monitoring iodines will be maintained within plant implementing procedures. Implementation of this commitment is complete. The capability to monitor radioactive iodines is considered a regulatory commitment.	Complete