

MAR 17 2004

LR-N04-0113



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

**RISK-INFORMED TECHNICAL SPECIFICATIONS
PILOT PLANT REQUEST FOR FEE WAIVER
HOPE CREEK NUCLEAR GENERATING STATION UNIT 1
FACILITY OPERATING LICENSE NO. NPF-57
DOCKET NO. 50-354**

The purpose of this letter is to request the NRC Staff to consider Hope Creek to become a pilot plant for the risk-informed Technical Specifications (RITS) for "Flexible Allowable Outage Times (AOT)", RITS Initiative 4b and "Extending Limiting Condition for Operation (LCO) 3.0.3 for Selected Systems", RITS Initiative 6.

In this effort we will work with the BWR Owners Group and NEI to assure that our efforts are compatible with the approaches already underway by the other Owners Groups.

We request that NRC reviews of our submittals, including any required reviews of our Probabilistic Risk Analysis (PRA) Model necessary to support our application, be granted a fee waiver pursuant to the provisions of 10 CFR 170.11, specifically:

1. The request is to assist in developing a NRC regulatory guide (to provide/endorse the risk management process) in accordance with 10 CFR 170.11(a)(1)(ii).
2. The request is to support NRC generic regulatory improvements (risk management technical specifications), in accordance with 10 CFR 170.11(a)(1)(iii).

Provided a fee waiver is granted, we expect to provide a draft of the proposed Technical Specifications and Bases during the second quarter of 2005 and the upgraded PRA during the last quarter of 2005. The full License Amendment request would be submitted by the end of the last quarter of 2005.

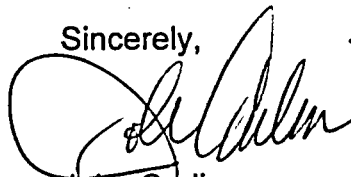
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Please inform us of your decision on our request for fee waiver as soon as practical so we may begin the preparation of our PRA upgrades and development of our licensing application.

If you have any questions or require additional information, please contact Mr. John Nagle at (856) 339-3171.

Sincerely,

A handwritten signature in black ink, appearing to read "John Carlin". The signature is fluid and cursive, with a large loop at the beginning.

John Carlin
Vice President - Nuclear Assessments

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

U. S. Nuclear Regulatory Commission
Mr. John Boska, Licensing Project Manager – Hope Creek
Mail Stop 8B2
Washington, DC 20555-001

U. S. Nuclear Regulatory Commission
Mr. Theodore Tjader, Technical Specification Branch (DIPM/IROB)
Mail Stop 12H2
Washington, DC 20555-001

Richard A. Hill
BWROG RITS Program Manager
GE Nuclear
175 Curtner Ave.
San Jose, CA 95125

USNRC Senior Resident Inspector – Hope Creek (X24)

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

Mr. Biff Bradley
Nuclear Energy Institute
1776 I Street, N. W.
Suite 400
Washington, DC 20006-3708