

August 2, 2004

Mr. A. Christopher Bakken, III
President & Chief Nuclear Officer
PSEG Nuclear, LLC - X15
Post Office Box 236
Hancocks Bridge, NJ 08038

SUBJECT: HOPE CREEK NUCLEAR GENERATING STATION, SECOND REQUEST FOR
ADDITIONAL INFORMATION REGARDING REQUEST FOR CHANGE TO
TECHNICAL SPECIFICATIONS EMERGENCY DIESEL GENERATOR
SURVEILLANCE TESTING REQUIREMENTS (TAC NO. MC1224)

Dear Mr. Bakken:

By letter dated October 23, 2003, PSEG Nuclear, LLC (PSEG) submitted license amendment request LCR H03-07 for the Hope Creek Generating Station (Hope Creek) seeking approval of proposed changes to the Hope Creek Technical Specifications. Specifically, the requested change would delete surveillance requirements associated with the emergency diesel generator lockout features.

By letter dated June 24, 2004, you responded to the Nuclear Regulatory Commission staff's May 7, 2004, request for additional information. The staff has reviewed your letter and found that additional information, and clarification of PSEG's response to the staff's May 7, 2004, information request, is required in order for the NRC staff to complete its review. This request has been discussed with Mr. John Nagle of your staff on August 2, 2004. Please provide your response to this letter within 30 days. If circumstances result in a need to delay your response, please contact me at (301) 415-1427.

Sincerely,

/RA/

Daniel S. Collins, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosure: As stated

cc w/encl: See next page

August 2, 2004

Mr. A. Christopher Bakken, III
President & Chief Nuclear Officer
PSEG Nuclear, LLC - X15
Post Office Box 236
Hancocks Bridge, NJ 08038

SUBJECT: HOPE CREEK NUCLEAR GENERATING STATION, SECOND REQUEST FOR
ADDITIONAL INFORMATION REGARDING REQUEST FOR CHANGE TO
TECHNICAL SPECIFICATIONS EMERGENCY DIESEL GENERATOR
SURVEILLANCE TESTING REQUIREMENTS (TAC NO. MC1224)

Dear Mr. Bakken:

By letter dated October 23, 2003, PSEG Nuclear, LLC (PSEG) submitted license amendment request LCR H03-07 for the Hope Creek Generating Station (Hope Creek) seeking approval of proposed changes to the Hope Creek Technical Specifications. Specifically, the requested change would delete surveillance requirements associated with the emergency diesel generator lockout features.

By letter dated June 24, 2004, you responded to the Nuclear Regulatory Commission staff's May 7, 2004, request for additional information. The staff has reviewed your letter and found that additional information, and clarification of PSEG's response to the staff's May 7, 2004, information request, is required in order for the NRC staff to complete its review. This request has been discussed with Mr. John Nagle of your staff on August 2, 2004. Please provide your response to this letter within 30 days. If circumstances result in a need to delay your response, please contact me at (301) 415-1427.

Sincerely,

/RA/

Daniel S. Collins, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosure: As stated

cc w/encl: See next page

DISTRIBUTION

PUBLIC PDI-2 Reading JClifford RJenkins ECobey, RGN-I
ACRS OGC DCollins OChoppra GMiller
JHardy

ACCESSION NUMBER: ML042150363

OFFICE	PDI-2/PE	PDI-2/PM	PDI-2/SC
NAME	GMiller	DCollins	JClifford
DATE	8/2/04	8/2/04	8/2/04

OFFICIAL RECORD COPY

Hope Creek Generating Station

cc:

Mr. John T. Carlin
Vice President - Nuclear Assessment
PSEG Nuclear - N10
P.O. Box 236
Hancocks Bridge, NJ 08038

Mr. David F. Garchow
Vice President - Engineering/Technical
Support
PSEG Nuclear - N28
P.O. Box 236
Hancocks Bridge, NJ 08038

Mr. Michael Brothers
Vice President - Site Operations
PSEG Nuclear - N10
P.O. Box 236
Hancocks Bridge, NJ 08038

Mr. James A. Hutton
Plant Manager
PSEG Nuclear - X15
P.O. Box 236
Hancocks Bridge, NJ 08038

Mr. Steven Mannon
Acting Manager - Nuclear Safety and
Licensing
PSEG Nuclear - N21
P.O. Box 236
Hancocks Bridge, NJ 08038

Jeffrie J. Keenan, Esquire
PSEG Nuclear - N21
P.O. Box 236
Hancocks Bridge, NJ 08038

Ms. R. A. Kankus
Joint Owner Affairs
Exelon Generation Company, LLC
Nuclear Group Headquarters KSA1-E
200 Exelon Way
Kennett Square, PA 19348

Lower Alloways Creek Township
c/o Mary O. Henderson, Clerk
Municipal Building, P.O. Box 157
Hancocks Bridge, NJ 08038

Dr. Jill Lipoti, Asst. Director
Radiation Protection Programs
NJ Department of Environmental
Protection and Energy
CN 415
Trenton, NJ 08625-0415

Brian Beam
Board of Public Utilities
2 Gateway Center, Tenth Floor
Newark, NJ 07102

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Senior Resident Inspector
Hope Creek Generating Station
U.S. Nuclear Regulatory Commission
Drawer 0509
Hancocks Bridge, NJ 08038

SECOND REQUEST FOR ADDITIONAL INFORMATION
REGARDING AMENDMENT REQUEST TO
DELETE EMERGENCY DIESEL GENERATOR SURVEILLANCE REQUIREMENTS
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

By letter dated October 23, 2003, PSEG Nuclear, LLC (PSEG) submitted license amendment request LCR H03-07 for the Hope Creek Generating Station (Hope Creek) seeking approval of proposed changes to the Hope Creek Technical Specifications. Specifically, the requested change would delete surveillance requirements associated with the emergency diesel generator lockout features.

By letter dated June 24, 2004, you responded to the Nuclear Regulatory Commission staff's May 7, 2004, request for additional information (RAI). The staff has reviewed your letter and found that the following information is required in order for the NRC's review to be completed:

1. The proposed change would essentially perform a line-item conversion to the improved standard technical specifications (ISTS) for the Hope Creek EDG surveillance requirements. Conversion to the ISTS involves an evaluation of proposed changes as discussed in the Nuclear Regulatory Commission's "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," published on July 22, 1995 (60 FR 36953). As discussed in this policy statement, removal of requirements from the technical specifications in the process of converting to the ISTS involves relocation of those requirements to licensee controlled documents (such as a Technical Requirements Manual or other document controlled under a 10 CFR 50.59 change control process). The PSEG submittal does not indicate where the surveillance requirements currently in TS 4.8.1.1.2.f will be relocated to. Identify and describe the licensee controlled document that will subsequently govern this requirement.
2. On Page 4 of PSEG's June 24 RAI response, it states:

"Furthermore, the listed features will continue to be functional and will be maintained in accordance with the diesel preventive maintenance program."

Provide a detailed description of the EDG preventive maintenance program. Identify if this program collects any as-found data regarding the subject lockout features. If no such as-found data is collected, explain how this program will maintain the EDG lockout features' design function and prevent interference with the EDG's safety function.
3. a) In both the initial submittal and subsequent response to the May 7, 2004, NRC RAI, PSEG stated that each successful EDG run demonstrates that the lockout relay features do not prevent the diesel from automatically starting. Provide a detailed justification for this claim. Specifically, demonstrate that the method(s) of starting the diesel used for the monthly tests do not have the potential to

ENCLOSURE

bypass or circumvent the lockout features. In making this justification, you should include any relevant diagrams and a list of the actual procedures used for these tests.

b. In addressing Criterion 4 of 10 CFR 50.36(c)(2)(ii) you state:

“The lockout features are tested frequently (at least monthly) and have been reliable. Therefore, operating experience has not shown the EDG lockout features to be significant to public health and safety.”

The staff takes issue with the claim that the monthly EDG run tests the lockout features. Although this run may be evidence that the lockout features are not actively blocking the diesel from starting, it does not provide any additional insight into their operability. Either provide information to demonstrate that the monthly testing fully tests the lockout features (from sensor to relay) rather than merely confirming that the lockout relays are not blocking the start signal, or provide available operating experience, including any applicable as-found data, sufficient to demonstrate acceptable reliability.

Additionally, significance to public health and safety is a combination of both reliability of operation and consequence of failure. Provide a justification that the likelihood of failure combined with its consequence has not been shown by operating experience or probabilistic risk assessment to be significant to public health and safety.