

August 31, 2004

MEMORANDUM TO: James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management

FROM: Daniel S. Collins, Senior Project Manager, Section 2 /RA/
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: EMAIL FROM PSEG NUCLEAR, LLC REGARDING HOPE CREEK
GENERATING STATION PROPOSED REMOVAL OF SELECTED
REACTOR PROTECTION SYSTEM SURVEILLANCE REQUIREMENTS
(TAC NO. MC1155)

By letter dated October 24, 2003 PSEG Nuclear, LLC (PSEG) requested a revision to the Hope Creek Generating Station Technical Specifications. During its review, the Nuclear Regulatory Commission staff (NRC or staff) identified that additional information was required and the questions were communicated to PSEG in a letter dated May 7, 2004. By letter dated June 29, 2004 PSEG provided a response to the staff's questions. On July 20, 2004 the staff had a teleconference with Mr. Paul Duke, PSEG to clarify certain aspects of the questions. Additional information, clarifying parts of their response, was provided to the NRC via an e-mail from Mr. Duke. The additional information is provided in attachment 1 to this memorandum.

Docket No. 50-354

Attachment: As stated

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1. The current APRM and RBM functional tests do not check trip setpoints. The procedures were changed in June 2002 (for APRMs) and March 2003 (for RBM) to eliminate the requirement to record trip and reset setpoints. Confirmation of trip setpoints is required by TS for channel calibrations, but not for channel functional tests.
2. The current recirc flow unit functional test procedure records trip setpoint data, but the associated procedure steps are not acceptance criteria for the functional test. If the as-found data exceeds the desired range, the applicable sections of the channel calibration are performed. The desired ranges are more restrictive than the TS allowable values.
3. Since we are not proposing to change any channel calibration intervals, we did not discuss instrument drift in our responses to RAIs 1.a and 1.b. Our responses provide the details on which to base the conclusion that the normal channel functional test frequencies will continue to provide sufficient assurance that the channels are functioning properly: a review of surveillance test results identified no case in the last three years in which a condition discovered during a periodic channel functional test would have prevented the APRMs or RBM from performing their required functions. For the recirc flow units, we identified one instance (a defective test card pushbutton switch in the last three years in which a condition discovered during a periodic channel functional test could have prevented a flow unit from performing its required functions.