

RT

From: David Vito
To: Joseph Schoppy
Date: 9/23/02 7:45AM
Subject: Re: Hope Creek allegation f/u

Thanks Joe - we will process

>>> Joseph Schoppy 09/23/02 07:38AM >>>
UPON FURTHER REVIEW, THE RULING IN THE FIELD STANDS - NO VIOLATION.

The attached documents my followup to a recent Hope Creek allegation. I have no plan to document this in my current inspection report. It is my understanding that this completes the residents' action item from that particular allegation panel. Please acknowledge receipt of this email. Thanks!

Joe

CC: Glenn Meyer; Raymond Lorson; Richard Barkley; Sharon Johnson

F-421

Concern: Technical Specification (TS) required surveillance tests (STs) are periodically scheduled in the grace period. Due to Salem and Hope Creek's use of a 12-week work week cycle, some of the STs are scheduled early to fit into the 12-week cycle (as the 52 week year is not evenly divisible by 12, unlike a 13-week cycle used at other sites). Subsequent STs are scheduled late (in the grace period) to fit into the 12-week cycle.

Surveillance Scheduling Regulatory Framework

Inspection Scope

Prior to launching a detailed review of the ST scheduling practices, the inspector reviewed the regulatory framework behind the concern: What if PSEG Nuclear periodically scheduled STs in the grace period? The inspector found the following sources of information relative to ST scheduling: (inspector comments are in bold)

Hope Creek Technical Specification 4.0.2: Each Surveillance Requirement shall be performed within its specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval. **(No mention of repeatedly using the grace period. The combined time interval for any 3 consecutive surveillance intervals (3.25 times the specified surveillance interval) limitation was eliminated by Amendment No. 37 to the Hope Creek Operating License. Salem Unit 1 & 2 TS 4.0.2 are identical to Hope Creek's.)**

Hope Creek Technical Specification Bases Specification 4.0.2: Establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval. **(Permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling. However, it is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances. Salem Unit 1 & 2 TS 4.0.2 bases are identical to Hope Creek's.)**

BWR Standard TS 4.0.2: Each Surveillance Requirement shall be performed within the specified time interval with: (a.) A maximum allowable extension not to exceed 25% of the surveillance interval, but (b.) The combined time interval for any 3 consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. **(The combined time interval for any 3 consecutive surveillance intervals limitation was eliminated by Amendment No. 37 to the Hope Creek Operating License.)**
Safety Evaluation by the Office of Nuclear Reactor Regulation Supporting Amendment No. 37

to Facility Operating License No. NPF-57 (dated April 3, 1990): The NRC staff has concluded that the removal of the 3.25 limit from Specification 4.0.2 results in a greater benefit to safety than limiting the use of the 25% allowance to extend surveillance intervals. This safety benefit can be demonstrated by extending the interval of a surveillance that, if performed rigidly to its schedule, would require its performance under conditions that are not suitable for performing the surveillance. Examples of this include conditions present during plant operating transients or times when safety systems are out of service because of ongoing surveillance testing or maintenance activities. In such cases, the safety benefit of allowing a 25-percent extension of the surveillance interval would outweigh any benefit derived by limiting three consecutive surveillance intervals to the 3.25 limit. Additionally, the requested change would provide relief of the administrative burdens associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit. Based upon the above, the NRC staff has concluded that the proposed change is consistent with the guidance in GL-89-14 and removal of the 3.25 limit will have an overall positive impact on safety. Thus, these changes are acceptable. **(We were ahead of our time: we ensured that safety was maintained while reducing unnecessary regulatory burden.)**

Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements (Generic Letter 87-09): (Provided guidance to address three specific problems encountered with the applicability of LCO and surveillance requirements.)

Line-Item Improvements in Technical Specifications - Removal of the 3.25 Limit on Extending Surveillance Intervals (Generic Letter 89-14): The intent of the 3.25 limit is to preclude routine use of the provision for extending a surveillance interval by 25 percent. Licensees and applicants are encouraged to propose changes to plant TS that are consistent with the guidance provided in the enclosure. Licensees should also propose changes to update the Bases Section of Specification 4.0.2. Generic Letter 87-09 provided updated Bases for Specification 4.0.2. The following changes to the Bases of Specification 4.0.2, as provided in Generic Letter 87-09, are shown underlined to reflect this change. "Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval." (PSEG Nuclear placed the above guidance, word for word, into the Hope Creek Technical Specification Bases for TS 4.0.2.)

Findings

Based on this review, the inspector determined that periodically scheduling STs in the grace period would not be a violation of the Hope Creek TSs and would not conflict with NRC guidance provided in NRC Inspection Manual Part 9900 or Generic Letters (GL 87-09, GL 89-14). However, this would be a concern if PSEG Nuclear repeatedly extended surveillance intervals beyond that specified for surveillances.

Surveillance Scheduling Review

Inspection Scope

The inspector performed a limited sample of completed STs to verify that PSEG Nuclear had not repeatedly extended surveillance intervals beyond that specified for surveillances (routinely scheduled STs in the grace period). The inspector reviewed three consecutive STs for four randomly chosen STs of varying periodicity (weekly, monthly, quarterly, and semi-annually).

The inspectors reviewed the following documents:

- *Control Rod Drive Accumulator Operability Check - Weekly* (HC.OP-ST.BF-0002); dated 7/16/02, 7/22/02, 7/29/02
- *Emergency Diesel Generator AG400 Operability Test - Monthly* (HC.OP-ST.KJ-0001); dated 7/22/02, 8/19/02, 9/16/02
- *B&D Core Spray Pumps-BP206 and DP206 - In-Service Test* (HC.OP-IS.BE-0002); dated 3/28/02, 6/12/02, 9/6/02
- *Containment Recombiner Functional Test - Semi-Annual* (HC.OP-ST.GS-0005); dated 12/15/01, 6/01/02, 8/22/02

Findings

The inspector determined that all sampled STs were scheduled and performed within the specified ST interval without relying on the grace period. Based on this limited review and previous inspections of surveillances performed using Inspection Procedure 71111-22, *Surveillance Testing*, the inspector determined that PSEG Nuclear does not repeatedly extend surveillance intervals (abuse grace period flexibility).