



**APR 10 2008**

10 CFR 50.54(f)

LR-N08-0073

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

Hope Creek Generating Station  
Facility Operating License No. NPF-57  
NRC Docket No. 50-354

**Subject:** Three-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

**Reference:** NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" dated January 11, 2008.

The U. S. Nuclear Regulatory Commission (NRC) issued NRC Generic Letter (GL) 2008-01 (Reference) to request that each licensee evaluate its Emergency Core Cooling System (ECCS), Decay Heat Removal (DHR) (Residual Heat Removal (RHR)) System, and Containment Spray System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine months of the date of the GL to provide the following information:

(a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL;

(b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,

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(c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.”

Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee “shall provide a response within three months of the date of this GL”. In the three-month response, the licensee was requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

PSEG Nuclear does not expect to complete the requested actions at Hope Creek Generating Station prior to the nine-month schedule, and, therefore, is providing the attached three-month response to document the planned actions and associated schedule.

This letter contains the following new commitments:

1. Complete the detailed walkdowns of inaccessible sections of GL 2008-01 subject systems prior to startup from the next refueling outage RF15. **(CM-2)**
2. Evaluations of GL 2008-01 subject systems complete within 90 days following the completion of the next refueling outage RF15. **(CM-3)**

If there are any questions regarding this response, please contact Lee Marabella at (856) 339-1208.

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

Executed on 4/10/08

Sincerely,



George P. Barnes  
Site Vice President – Hope Creek

Attachments:

1. Hope Creek Generating Station Three Month Response to NRC Generic Letter 2008-01
2. List Of Commitments

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Records Management

**Attachment 1**  
**HOPE CREEK GENERATING STATION THREE MONTH RESPONSE TO NRC**  
**GENERIC LETTER 2008-01**

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," addresses the Hope Creek Generating Station three-month response requested in NRC GL 2008-01, which was dated January 11, 2008. This response discusses:

1. the required evaluations that will not be complete by October 11, 2008 (nine months from the date of GL 2008-01),
2. the alternative course of action planned, and
3. the basis for the acceptability of the alternative course of action.

Scope of Effort

The scope of evaluations required to support the response to GL 2008-01 include the following systems:

- Residual Heat Removal System (Various modes of operation)
- High Pressure Core Injection (HPCI)
- Core Spray System

The evaluations will include the review of the four principle areas addressed in the GL 2008-01: Licensing Basis; Design; Testing and Corrective Actions. Actions that will be taken include performance of a thorough review of the licensing bases, plant and programmatic procedures, technical specifications, design drawings and our Corrective Action Program database. Walkdowns will be performed for piping systems to confirm items such as adequate vent capability for system high points and verification of design drawings. Previous drawing reviews and design basis verifications will be used as part of this process.

The evaluations of these systems will be performed as requested in GL 2008-01, however, not all evaluations will be completed within the schedule provided for in the generic letter.

Evaluations that will not be complete by October 11, 2008

The requested information in GL 2008-01 includes "A description of the results of evaluations that were performed....". The evaluations performed are those required to ensure that gas accumulations are maintained less than the amount that challenges operability of these systems. It will not be possible to perform the walkdowns on portions of these systems before October 11, 2008 because of the need for a refueling outage to perform the walkdowns.

Therefore, due to the inability to finish the walkdowns, the requested evaluations for these systems will not be complete by October 11, 2008. The requirement for performance of the inspections during a refueling outage is based on the following:

- The walkdowns of these systems require entry into areas of high radiation or inerted atmosphere (less than 4% oxygen inside the drywell) during power operations.

**Attachment 1**  
**HOPE CREEK GENERATING STATION THREE MONTH RESPONSE TO NRC**  
**GENERIC LETTER 2008-01**

- Restrictions on removal of insulation, if required, from piping during power operations prevent removal of sections of insulation from piping needed to perform proper evaluations of the piping systems.
- Erection of scaffolding may be prohibitive during power operations for locations over safety related equipment or if high radiation levels exist in the area of concern preclude installing scaffolding.

Alternative Course of Actions Planned

The next available refueling outage, RF15, is currently scheduled for April 2009. Therefore, PSEG Nuclear will perform these walkdowns during this outage and evaluate the findings upon completion. All other system walkdowns will be performed during the nine-month timeframe prescribed by GL 2008-01.

Acceptability of Alternative Course of Action:

The alternative course of action is acceptable based on the operational experience and previous actions taken to resolve identified issues.

- Previous surveillance testing performed on GL 2008-01 subject systems and interviews with operations personnel have confirmed that there are currently no gas voiding issues with the Hope Creek Unit.
- Pre-existing operating procedures include monthly venting of the GL 2008-01 subject systems to ensure systems are maintained sufficiently filled. No current issues have been identified in the performance of these procedures.
- In-service testing of the GL 2008-01 subject systems are routinely performed and no known issues impacting pump operability have been identified during this testing.  
Hope Creek Generating Station has improved venting procedures and added vent valves to ensure adequate system venting and filling as part of corrective actions for previous gas accumulation issues.

PSEG Nuclear has confidence that the GL 2008-01 subject systems can perform their required design functions based on the above-described operating experience, surveillance and performance testing, and past corrective actions that have been performed to manage gas intrusion issues at the Hope Creek Generating Station.

For these reasons, PSEG Nuclear concludes that completing performance of detailed walkdowns on a portion of subject piping systems that require refueling outages and subsequent evaluations outside the requested nine month period is an acceptable alternative course of action for Hope Creek Generating Station.

**List of Commitments  
 Hope Creek Generating Station**

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

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM- MATIC (YES/NO)
Complete the detailed walkdowns of inaccessible sections of GL 2008-01 subject systems prior to startup from the next refueling outage. <b>(CM-2)</b>	End of RF15	Yes	No
Evaluations of GL 2008-01 subject systems complete within 90 days following the completion of the next refueling outage. <b>(CM-3)</b>	End of RF15 + 90 days	Yes	No