



LR-N08-0237
October 20, 2008

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: Response to Request for Additional Information Regarding Proposed
License Amendment - Technical Specification Requirements for
Inoperable Inverters

References: 1) Letter from George P. Barnes (PSEG Nuclear LLC) to USNRC,
July 30, 2008
2) Letter from Christine T. Neely (PSEG Nuclear LLC) to USNRC,
September 29, 2008
3) U.S. Nuclear Regulatory Commission e-mail dated October 2, 2008,
Hope Creek Generating Station, Draft Request for Additional
Information (TAC No. MD9355), Accession No. ML082760761

In Reference 1, PSEG Nuclear LLC (PSEG) requested an amendment to Facility
Operating License No. NPF-57 for Hope Creek Generating Station (HCGS). The
proposed license amendment would revise Technical Specification (TS) 3.8.3.1,
"Distribution - Operating," to establish a separate TS Action statement for inoperable
inverters in Operational Conditions 1, 2 and 3. In Reference 2, PSEG provided
responses to NRC requests for additional information.

In Reference 3, the NRC transmitted an additional draft request for additional
information concerning the proposed change. Attachment 1 to this letter provides
PSEG's response.

PSEG has determined that the information provided in response to this request for
additional information does not alter the conclusions reached in the 10 CFR 50.92 no
significant hazards determination previously submitted.

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There are no regulatory commitments contained within this letter or attachment.

Should you have any questions regarding this submittal, please contact Mr. Paul Duke at 856-339-1466.

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

Executed on October 20, 2008
(date)

Sincerely,



Christine T. Neely
Director - Regulatory Affairs
PSEG Nuclear LLC

Attachment

1. Response to Request for Additional Information

cc: S. Collins, Regional Administrator – NRC Region I
R. Ennis, Project Manager - USNRC
NRC Senior Resident Inspector - Hope Creek
P. Mulligan, Manager IV, NJBNE

ATTACHMENT 1**Hope Creek Generating Station****Facility Operating License NPF-57
Docket No. 50-354****Response to Request for Additional Information****Action for Inoperable Inverters**

In Reference 1, PSEG Nuclear LLC (PSEG) submitted a license amendment request for Hope Creek Generating Station (HCGS). The proposed amendment would revise Technical Specification (TS) 3.8.3, "Onsite Power Distribution Systems," to establish a separate TS Action statement for inoperable inverters associated with the 120 volt alternating current (VAC) distribution panels. The intent of the proposed amendment is to extend the allowed outage time for inoperable inverters from 8 hours to 24 hours. In Reference 2, PSEG provided responses to NRC requests for additional information.

In Reference 3, the NRC transmitted an additional draft request for additional information concerning the proposed change. PSEG's response is provided below.

1. PSEG is requesting a change to the TSs such that when one or both of the inverters in a channel is inoperable, the 120 VAC distribution panel should be energized within 8 hours and the inverter restored in 24 hours. NUREG-1433, "Standard Technical Specifications (STS) General Electric Plants, BWR/4", STS Limiting Condition for Operation (LCO) 3.8.7, "Inverters - Operating," indicates that the inverter should be restored to operable status in 24 hours and requires entering STS LCO 3.8.9, "Distribution Systems - Operating" with any AC vital bus de-energized. STS LCO 3.8.9 B requires that the AC vital bus distribution subsystem(s) be restored within 2 hours. Provide justification for the proposed 8 hour timeframe to restore the 120 VAC distribution panel(s) versus the 2 hour timeframe shown in the STS.

Response

1. The proposed TS requirement to re-energize the 120 VAC distribution panel associated with an inoperable inverter within 8 hours is consistent with the current HCGS TS requirements. With one of the required AC distribution system channels (including 120 VAC distribution panels) not energized, current HCGS TS Action 3.8.1.3.a requires the channel to be re-energized within 8 hours.
2. When one or both 120 VAC distribution panels in one channel are de-energized, there is a loss of redundancy, but not a loss of function. The

remaining OPERABLE 120 VAC distribution panels are capable of supporting the minimum safety functions.

3. The Bases provided for the 2 hour Completion Time in NUREG-1433 also support the 8 hour allowed outage time in the HCGS TS. Specifically, the 8 hour limit is more conservative than the allowed outage times for the majority of components that are without adequate 120 VAC power. The 8 hour allowed outage time is justified based on the following considerations:
 - The potential for decreased safety when requiring a change in plant conditions (i.e., requiring a shutdown) while not allowing stable operations to continue,
 - The potential for decreased safety when requiring entry into numerous applicable LCOs and TS Actions for components without adequate 120 VAC power, while not providing sufficient time for plant operators to perform the necessary evaluations and actions to restore power to the affected division, and
 - The potential for an event in conjunction with a single failure of a redundant component.

The 8 hour allowed outage takes into account the importance to safety of restoring the 120 VAC distribution panels to OPERABLE status, the redundant capability afforded by the other OPERABLE 120 VAC distribution panels, and the low probability of a design basis event occurring during this period.

References

1. Letter from George P. Barnes (PSEG Nuclear LLC) to USNRC, July 30, 2008
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