UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 12, 2009

MEMORANDUM TO: Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: HOPE CREEK GENERATING STATION, DRAFT REQUEST FOR ADDITIONAL INFORMATION (TAC NO. MD9337)

The attached draft request for information (RAI) was transmitted on January 12, 2009, to Mr. Jeff Keenan of PSEG Nuclear LLC (the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's letter dated July 30, 2008, which submitted relief request HC-I3R-04 and an associated license amendment request for Hope Creek Generating Station related to requirements for snubbers.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket No. 50-354

Attachment: Draft RAI

DRAFT REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED LICENSE AMENDMENT

TECHNICAL SPECIFICATION REQUIREMENTS FOR SNUBBERS

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

By letter dated July 30, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML082200316), PSEG Nuclear LLC (PSEG or the licensee) submitted relief request HC-I3R-04 and an associated license amendment request for Hope Creek Generating Station (HCGS) related to requirements for snubbers. The proposed amendment would relocate Technical Specification (TS) 3/4.7.5, "Snubbers," to the HCGS Technical Requirements Manual (TRM). TS 6.10.3.l, which specifies retention requirements for records of snubber service life monitoring pursuant to TS 4.7.5, would also be relocated to the TRM. In addition, the amendment would add new TS Limiting Condition for Operation (LCO) 3.0.8, "Inoperability of Snubbers," and would modify LCO 3.0.1 to reference LCO 3.0.8.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed amendment and would like to discuss the following issues to clarify the submittal.

1) PSEG's application stated that the proposed addition of LCO 3.0.8 is consistent with NRC approved Technical Specification Task Force (TSTF) change TSTF-372, Revision 4, as published in the *Federal Register* on May 4, 2005 (70 FR 23252) as part of the Consolidated Line Item Improvement Process (CLIIP). The *Federal Register* notice for TSTF-372 included a model safety evaluation (SE). Section 3.1 of the model SE discusses implementation of the three-tiered approach discussed in Regulatory Guide (RG) 1.177 to support the proposed addition of LCO 3.0.8. Section 3.1.2 of the model SE states, in part, that:

> The second tier of the three-tiered approach recommended in RG 1.177 involves the identification of potentially high-risk configurations that could exist if equipment, in addition to that associated with the TS change, were to be taken out of service simultaneously. Insights from the risk assessments, in conjunction with important assumptions made in the analysis and defense-in-depth considerations, were used to identify such configurations. To avoid these potentially high-risk configurations, specific restrictions to the implementation of the proposed TS changes were identified.

Section 3.1.2 of the model SE identifies the following restrictions, applicable to boiling water reactor (BWR) plants, to prevent potentially high-risk configurations (hereafter referred to as the "Tier 2 restrictions"):

Attachment

1. For BWR plants, one of the following two means of heat removal must be available when LCO 3.0.8a is used:

   - At least one high pressure makeup path (e.g., using high pressure coolant injection (HPCI) or reactor core isolation cooling (RCIC) or equivalent) and heat removal capability (e.g., suppression pool cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s), or

   - At least one low pressure makeup path (e.g., low pressure coolant injection (LPCI) or containment spray (CS)) and heat removal capability (e.g., suppression pool cooling or shutdown cooling), including a minimum set of supporting equipment required for success, not associated with the inoperable snubber(s).

2. When LCO 3.0.8b is used at BWR plants, it must be verified that at least one success path exists, using equipment not associated with the inoperable snubber(s), to provide makeup and core cooling needed to mitigate LOOP [loss of offsite power] accident sequences.

Please provide specific information which describes how PSEG proposes to ensure that HCGS operation will be in accordance with the above Tier 2 restrictions.

2) In addition to the Tier 2 restrictions, discussed in question 1 above, Section 3.2, item 1(e), of the model SE requires that appropriate plant procedures and administrative controls be used to implement the following restriction:

> Every time the provisions of LCO 3.0.8 are used licensees will be required to confirm that at least one train (or subsystem) of systems supported by the inoperable snubbers would remain capable of performing their required safety or support functions for postulated design loads other than seismic loads. LCO 3.0.8 does not apply to non-seismic snubbers. In addition, a record of the design function of the inoperable snubber (i.e., seismic vs. non-seismic), implementation of any applicable Tier 2 restrictions, and the associated plant configuration shall be available on a recoverable basis for staff inspection.

Please provide specific information which describes how PSEG proposes to ensure that HCGS operation will be in accordance with the above restriction.

3) As required by 10 CFR 50.34(b), the Updated Final Safety Analysis Report (UFSAR) "shall include information that describes the facility, presents the design bases **and the limits on its operation,..** [emphasis added]." Please provide a regulatory commitment to revise the UFSAR (upon implementation of the amendment) to describe the restrictions discussed in questions 1 and 2 above.

January 12, 2009

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