



LR-N09-0029
February 6, 2009

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 License
Amendment Request - Snubbers

References: 1) Letter from George P. Barnes (PSEG Nuclear LLC) to USNRC,
July 30, 2008
2) U.S. Nuclear Regulatory Commission e-mail dated January 12, 2009,
Hope Creek Generating Station, Draft Request for Additional
Information (TAC NO. MD9337), Accession No. ML090120593

In Reference 1, PSEG Nuclear LLC (PSEG) submitted a relief request and associated license amendment request for Hope Creek Generating Station (HCGS). The proposed license amendment would modify Technical Specifications (TS) by relocating the current snubber TS requirements to the HCGS Technical Requirements Manual (TRM) and adding LCO 3.0.8 for inoperable snubbers to the TS.

In Reference 2, the NRC transmitted a draft request for additional information concerning the license amendment request. 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.

This submittal makes additional regulatory commitments which are summarized in Attachment 2.

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NRR

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 February 6, 2009
(date)

Sincerely,



Christine T. Neely
Director - Regulatory Affairs
PSEG Nuclear LLC

Attachments

1. Response to Request for Additional Information
2. Revised Summary of Commitments

cc: S. Collins, Regional Administrator – NRC Region I
R. Ennis, Project Manager - USNRC
NRC Senior Resident Inspector - Hope Creek
P. Mulligan, Manager IV, NJBNE
L. Marabella - Corporate Commitment Tracking Coordinator
T. Devik - HC Commitment Tracking Coordinator

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

In Reference 1, PSEG Nuclear LLC (PSEG) submitted a relief request and associated license amendment request for Hope Creek Generating Station (HCGS). The proposed license amendment would modify Technical Specifications (TS) by relocating the current snubber TS requirements to the HCGS Technical Requirements Manual (TRM) and adding LCO 3.0.8 for inoperable snubbers to the TS.

In Reference 2, the NRC transmitted a draft request for additional information concerning the relief request. PSEG's response is provided below.

- 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 (CLIP). 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"):

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.

Response:

PSEG will ensure appropriate plant procedures and administrative controls are revised to implement 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.

Response:

PSEG will ensure appropriate plant procedures and administrative controls are revised to implement the above Tier 2 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.

Response

Upon implementation of the amendment, PSEG will revise the UFSAR to describe the restrictions in questions 1 and 2 above.

ATTACHMENT 2

Hope Creek Generating Station

Facility Operating License No. NPF-57
NRC Docket No. 50-354Relocation of Technical Specification 3/4.7.5 and Addition of
LCO 3.0.8 Regarding Snubbers

Revised Summary of Commitments

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		One-Time Action (Yes/No)	Programmatic (Yes/No)
PSEG will establish the Technical Specification Bases for LCO 3.0.8 as adopted with the applicable license amendment.	To be implemented with the license amendment	Yes	No
<p>PSEG will ensure appropriate plant procedures and administrative controls are revised to implement the following Tier 2 Restrictions:</p> <p>1. For BWR plants, one of the following two means of heat removal must be available when LCO 3.0.8a is used:</p> <ul style="list-style-type: none"> • 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). <p>2. When LCO 3.0.8b is used at BWR plants, it</p>	To be implemented with the license amendment	Yes	No

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		One-Time Action (Yes/No)	Programmatic (Yes/No)
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.			
<p>PSEG will ensure appropriate plant procedures and administrative controls are revised to implement the following Tier 2 Restriction:</p> <ul style="list-style-type: none"> • 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. 	To be implemented with the license amendment	Yes	No
PSEG will revise the UFSAR to describe the restrictions in questions 1 and 2 above.	Upon implementation of the amendment	Yes	No