April 15, 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 ***/ra/***
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. ME0341)

The attached draft request for information (RAI) was transmitted on April 15, 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 amendment request for Hope Creek Generating Station dated January 5, 2009. The proposed amendment would modify Technical Specifications (TS) requirements for mode change limitations in accordance with Revision 9 of Nuclear Regulatory Commission (NRC)-approved TS Task Force (TSTF) change TSTF-359, "Increase Flexibility in Mode Restraints."

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

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Attachment: Draft RAI

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED LICENSE AMENDMENT

MODE CHANGE LIMITATIONS

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

By application dated January 5, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML090130384), PSEG Nuclear LLC (PSEG or the licensee) submitted a license amendment request for the Hope Creek Generating Station (HCGS). The proposed amendment would modify Technical Specifications (TS) requirements for mode change limitations in accordance with Revision 9 of Nuclear Regulatory Commission (NRC)-approved TS Task Force (TSTF) change TSTF-359, "Increase Flexibility in Mode Restraints."

In a *Federal Register* notice dated April 4, 2003 (68 FR 16579), the NRC staff issued a notice of availability of a model application for proposed license amendments adopting TSTF-359 using the consolidated line item improvement process (CLIIP). The notice also included a model safety evaluation (SE). In its application dated January 5, 2009, the licensee affirmed the applicability of the model SE.

The 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) Licensees interested in increasing flexibility in mode restraints by implementing Revision 9 of TSTF-359 must, as applicable, delete pre-existing limiting condition for operation (LCO) 3.0.4 exceptions in the current TSs. Deletion of pre-existing LCO 3.0.4 exceptions that contain plant-specific non-standard LCO 3.0.4 exceptions may result in TS requirements that are different from those justified by the CLIIP model SE (i.e., CLIIP SE is based on TSTF-359 changes to the Standard Technical Specifications (STS)).

   HCGS LCO 3.6.3 provides the operability requirements for primary containment isolation valves (PCIVs). ACTION a.4 in LCO 3.6.3, which contains a plant-specific non-standard LCO 3.0.4 exception, would be deleted by the proposed amendment. ACTION a.4 states:

   > The provisions of Specification 3.0.4 are not applicable provided that within 4 hours the affected penetration is isolated in accordance with ACTION a.2, or a.3, above, and provided that the associated system, if applicable, is declared inoperable and the appropriate ACTION statements for that system are performed.

   Provide further justification for the proposed deletion of ACTION a.4 in LCO 3.6.3. Specifically, demonstrate that the proposed amendment:

a. Establishes a set of requirements that are equivalent to the current LCO 3.0.4 exception specified in ACTION a.4 of LCO 3.6.3; or

b. Establishes a set of requirements that are equivalent to STS (NUREG-1433) LCO 3.6.1.3, Primary Containment Isolation Valves, ACTIONS Note 3, which states "Enter applicable Conditions and Required Actions for systems made inoperable by PCIVs;" or

c. Establishes a set of requirements that ensures appropriate remedial actions are taken, if necessary, if the affected system(s) are rendered inoperable by an inoperable PCIV.

2) Section 3.1.1, "Temporary Risk Increases," of the model SE for the CLIIP states, in part, that:

> A major element that limits the risk of the proposed mode change flexibility is the exclusion of certain systems and associated LCOs for the mode change allowance. Technical specifications allow operation in Mode 1 (power operation) with specified levels of inoperability for specified times. This provides a benchmark of currently acceptable risk against which to measure any incremental risk inherent in the proposed LCO 3.0.4(b).....However, the risk management process evaluated in Section 3.1.3 is adequate if higher-risk systems/components are excluded from the scope of LCO 3.0.4(b).

The SE identified the following systems and components, applicable to BWR/4 plants, as higher-risk systems and components, when the plant is entering a new mode (excluding entering Mode 4).

- High Pressure Coolant Injection System
- Reactor Core Isolation Cooling System
- Diesel Generators (including other Emergency/Shutdown AC Power Supplies)
- Hardened Wetwell Vent System

Provide a plant-specific evaluation of the risk-importance of the Hardened Wetwell Vent System and the Emergency/Shutdown AC Power Supplies to show that they are not higher risk systems which should be excluded from the scope of LCO 3.0.4(b) to meet the SE findings contained in Section 3.1.3, "Risk Assessment and Risk Management of Mode Changes."

3) Please address the following comment provided by the New Jersey (NJ) Bureau of Nuclear Engineering (BNE):

> The proposed changes to the Bases pages (Attachment 4) state on the third page that "The LCO 3.0.4.b risk assessments do not have to be documented." The position of the NJ BNE is that documentation of these risk assessments is necessary in order to provide a method for verifying that these risk assessments address all risk concerns, are performed and reviewed correctly, and become a permanent record. Without documentation, any future inquiries as to a specific operational condition change that required a risk assessment would be severely hampered. Therefore, we suggest that the above quoted sentence be deleted from the proposed Bases pages.