

May 14, 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. MD9336)

The attached draft request for information (RAI) was transmitted on May 14, 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 examinations and tests 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

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G. Bedi, NRR/DCI

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| DATE   | 5/14/09  |

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DRAFT REQUEST FOR ADDITIONAL INFORMATION  
RELATED TO RELIEF REQUEST HC-I3R-04  
FOR THIRD TEN-YEAR INSERVICE INSPECTION INTERVAL  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354

By letter dated July 30, 2008, as supplemented by letters dated January 30, and February 6, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML082200316, ML090490674, and ML090560538 respectively), 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 examinations and tests for snubbers. With respect to relief request HC-I3R-04, PSEG requested relief from certain requirements specified in the American Society of Mechanical Engineers Boiler (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM) for the third inservice inspection (ISI) interval at HCGS.

As followup to a conference call between the Nuclear Regulatory Commission (NRC) staff and PSEG on May 12, 2009, the NRC staff has determined that the following additional information is needed to clarify the submittal:

- 1) The basis for the snubber degradation rate that is assumed in the white paper for Code Case OMN-15 (Reference 2 in PSEG's relief request dated July 30, 2008) is not clear. Please provide the following information to support extension of the functional test interval at HCGS:
  - a. The degradation rate of all installed snubbers at HCGS based on their design, size, age, location and operating environment.
  - b. Available data (i.e., manufacturer, maintenance, service life monitoring (SLM), inspection and testing, and repair and replacement work) to support the quality and operational readiness of snubbers at HCGS for an extended interval without performing ISTD required functional testing.
  - c. Success rate of completing previous test campaigns (using 37 sample plan) at HCGS without performing any additional testing of snubbers as required by ISTD-5420.
- 2) ISTD provides guidance for assigning unacceptable snubbers to a Failure Mode Group (FMG) where they are no longer counted in satisfying the mathematical expression for testing of the Defined Test Plan Group (DTPG) (as defined in ISTD-5331 and ISTD-5431). Conversely, Code Case OMN-15 does not provide any guidance related to assigning unacceptable snubbers found during DTPG testing to a FMG. Additionally,

Attachment

ISTD-5311 (10% sample testing plan) requires that the sample shall include representation from the DTPG, and ISTD-5411 (37 testing sample plan) requires that a sample of 37 snubbers shall be selected randomly from the DTPG. Code Case OMN-15 does not provide any direction related to snubber sample selection method when using Table 1, Column. B. Please provide the following:

- a. Details about the plan for HCGS for assigning any unacceptable snubbers to a FMG, when testing the DTPG using the mathematical expression listed in Table 1, Column B of Code Case OMN-15.
  - b. Details about the sample selection method (e.g., representation or random) for HCGS, when using Table 1, Column B of the Code Case OMN-15.
- 3) The Code Case does not address treatment of isolated snubber failures. To avoid improper classification of unacceptable snubbers as “isolated failures,” the ISTD Subgroup committee is in the process of deleting the “isolated failure” category from ISTD. Please provide the plan regarding categorizing unacceptable snubbers as “isolated failures” for HCGS when using Code Case OMN-15.
- 4) The Code Case does not address how unacceptable snubbers are accounted for during the extended test interval. For example, unacceptable snubbers could be identified during maintenance, service life monitoring, and visual examination (operational readiness testing, when visual exam fails) activities conducted during the extended test interval. Please provide the following:
  - a. Details of plans to address unacceptable snubbers found during the extended test interval to maintain their operational readiness.
  - b. Details about the use of additional means to maintain snubber operational readiness and integrity when the extended interval is more than one fuel cycle.
- 5) Use of Code Case OMN-15 allows skipping of functional testing of snubbers up to three fuel cycles (54 months). Visual examination of snubbers can be skipped up to two fuel cycles (36 months), as permitted by ISTD, Table ISTD-4252-1. During the teleconference on May 12, 2009, PSEG staff mentioned that visual examination is a key element in detecting problems or defects with hydraulic snubbers at HCGS. Please describe actions that will be taken to maintain operational readiness of snubbers in the absence of both visual examination and functional testing during the extended interval.