



LR-N09-0140
June 25, 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: Supplement to Response to Request for Additional Information Regarding
Relief Request for Examinations and Tests of Snubbers

- References:
- 1) Letter from George P. Barnes (PSEG Nuclear LLC) to USNRC, "Relief Request for Third Interval Inservice Inspection Program for Examinations and Tests of Snubbers and Associated License Amendment Request," dated July 30, 2008
 - 2) Letter from Jeffrie Keenan (PSEG Nuclear LLC) to USNRC, "Response to Request for Additional Information Regarding Relief Request for Examinations and Tests of Snubbers," dated June 11, 2009

In Reference 1, PSEG Nuclear LLC (PSEG) 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. The relief request proposed an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants for snubber operational readiness testing. In Reference 2, PSEG provided additional information concerning the relief request.

Attachment 1 to this letter provides clarifications to the information provided in Reference 2.

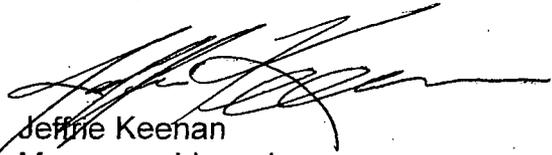
There are no commitments contained in this letter.

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

Sincerely,



Jeff Keenan
Manager - Licensing
PSEG Nuclear LLC

Attachment

1. Supplement to 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

SUPPLEMENT TO RESPONSE TO REQUEST FOR ADDITIONAL INFORMATIONRELATED TO RELIEF REQUEST HC-I3R-04FOR THIRD TEN-YEAR INSERVICE INSPECTION INTERVALHOPE CREEK GENERATING STATIONDOCKET 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.

By letter dated June 11, 2009 PSEG provided additional information concerning the relief request. In response to a request from the NRC staff, the following information is provided as clarifications to information contained in the June 11, 2009 letter.

1. In Response to RAI # 1.b, second paragraph, fourth line, PSEG states that "The most recent series of tests conducted during RF15 in the spring of 2009 resulted in 55 acceptable tests, and no unacceptable tests on snubbers." Whereas in response to RAI # 1.c, first paragraph, PSEG states that "There have been eight test campaigns successfully completed using the sample plan described in Technical Specification Surveillance Requirement 4.7.5.e.2 (similar to the 37 sample plan from ISTD)."

Please clarify the number of snubbers tested or sample plan used (37 snubber plan or different 55 plan) during RF15 at Hope Creek.

Response

Hope Creek tested 55 snubbers during RF15, in anticipation of implementing the proposed alternative during RF16. There were no operational readiness test failures among the 55 snubbers tested. Upon authorization of the proposed alternative, PSEG plans to extend the test interval to two cycles (i.e., bypass a test campaign at RF16), based on the successfully completed test campaigns during RF13, RF14 and RF15.

The RF 15 total consisted of 37 snubbers to satisfy current Technical Specification (TS) Surveillance Requirement 4.7.5.e.2; 15 additional snubbers to satisfy OMN-15, Table 1, Column A; two non-TS snubbers; and a snubber found

to have an empty fluid reservoir (described in the response to RAI 1.a in PSEG's letter dated June 11, 2009).

2. In Response to RAI # 1.b, second paragraph, eighth line, PSEG states that "During the past eight fuel cycles, visual examinations have been conducted in accordance with the schedule specified in HCGS Technical Specification Table 4.7.5-1 (similar to Table ISTD-4252-1) on all accessible and inaccessible snubbers." Whereas in response to RAI # 5, fourth line, it states that "PSEG will continue to perform approximately half of the visual examinations during each fuel cycle (accessible/inaccessible)."

Please verify the difference in these statements. Table ISTD-4252-1 allows the licensee to skip the visual examination based on snubbers' performance. Please explain and verify, if PSEG is planning to use a different approach (half of the visual examination of snubbers during each cycle) for visual examination than as required by ISTD Table-4252-1.

Response

PSEG currently performs the HCGS accessible and inaccessible snubber visual examinations during alternating refueling outages. This results in approximately one half of the snubber population being examined each refueling outage. Visual examinations will be performed in accordance with the requirements of Table ISTD-4252-1 of Subsection ISTD. However, when Table ISTD-4252-1 permits the examination interval to be extended to two fuel cycles, PSEG plans to continue the current practice of performing visual examinations on the accessible and inaccessible snubbers during alternating refueling outages.

3. PSEG's RAI response indicates that TS 3/4.7.5 is still being used for snubber examination and testing at Hope Creek, which was authorized via Relief Request HC-13R-02 for its third 10-year interval program.

When is PSEG planning to convert Hope Creek's third 10-year interval program to ISTD to make use of requirements as specified in Code Case OMN-15?

Response

PSEG plans to adopt Subsection ISTD upon implementation of the license amendment adding Limiting Condition for Operation (LCO) 3.0.8 and relocating TS 3/4.7.5 to the HCGS Technical Requirements Manual (TRM). Upon implementation of the license amendment, PSEG will make appropriate changes to the TRM reflecting adoption of Subsection ISTD.