

July 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. ME0341)

The attached draft request for additional information (RAI) was transmitted on July 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 amendment request for Hope Creek Generating Station dated January 5, 2009. The proposed amendment would modify Technical Specification (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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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, as supplemented by letter dated June 9, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML090130384 and ML091670251, respectively), PSEG Nuclear LLC (the licensee) submitted a license amendment request for the Hope Creek Generating Station (HCGS). The proposed amendment would modify Technical Specification (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."

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.

Background

During the license amendment review of TSTF-359 for HCGS a generic issue was identified by the NRC staff. TSTF-359 proposed changes that would modify limiting condition for operation (LCO) 3.0.4 and surveillance requirement 3.0.4 by risk-informing limitations on entering the mode of applicability of an LCO. The issue is that TSTF-359 will remove the current LCO 3.0.4 exceptions and insert new LCO 3.0.4(b) exceptions in accordance with the list of higher risk systems in Section 3.1.1 of the Consolidated Line Item Improvement Process (CLIIP) model safety evaluation. The list of high risk systems had been determined using the owners groups generic qualitative risk assessments. LCO 3.0.4(a) states, "When the associated ACTIONS to be entered permit continued operation in the OPERATIONAL MODE or other specified condition in the Applicability for an unlimited period of time." Licensees can now apply LCO 3.0.4(a) to systems that were previously prohibited, without a risk assessment. Neither the licensee nor the NRC have evaluated and documented why this is acceptable. This is a generic issue that applies to all licensees that have adopted TSTF-359, or may apply to adopt TSTF-359. Further details are provided below.

The proposed LCO 3.0.4(a) retains the current LCO 3.0.4 allowance for when the required actions allow indefinite operation. TSTF-359 removes the current, "LCO 3.0.4 is not applicable" exceptions in the individual specifications. Some plant-specific LCOs contain ACTIONS that allow an unlimited period of time, and currently do not allow LCO 3.0.4 to be applied.

The model safety evaluation addresses the current notes in individual specifications stating that they are now encompassed by LCO 3.0.4(b) and can be removed. The model safety evaluation does not address allowing the use of LCO 3.0.4(a) (risk assessment not required) on LCOs that were previously prohibited. Future TSTF-359 adoptions will require licensees to provide a safety assessment for removal of each plant-specific LCO 3.0.4 exception.

As an alternative, licensees can opt to adopt TSTF-359 without LCO paragraph (a) or retain the current LCO exceptions and change them to read LCO 3.0.4(a) instead of LCO 3.0.4.

Request for Additional Information

- 1) Licensees interested in increasing flexibility in mode restraints by implementing TSTF-359, Revision 9 must, as applicable, remove pre-existing limiting condition for operation (LCO) 3.0.4 exceptions in the current TSs. The CLIIP model TSs for BWR/4 plants (i.e., NUREG-1433) identified the following LCOs as having LCO 3.0.4 exceptions to be removed:

<u>TS</u>	<u>DESCRIPTION</u>
3.3.3.1	Post Accident Monitoring (PAM) Instrumentation
3.3.3.2	Remote Shutdown System
3.3.6.3	Low-Low Set (LLS) Instrumentation
3.4.6	RCS Leakage Detection Instrumentation
3.4.7	RCS Specific Activity
3.4.8	Residual Heat Removal (RHR) Shutdown Cooling System – Hot Shutdown
3.6.3.1	Primary Containment Hydrogen Recombiners (if permanently installed)
3.6.3.2	Drywell Cooling System Fans
3.6.3.4	Containment Atmosphere Dilution (CAD) System
3.7.3	Diesel Generator (DG) [1B] Standby Service Water (SSW) System

The proposed amendment would remove HCGS-specific pre-existing LCO 3.0.4 exceptions from the TSs. Removal of any plant-specific pre-existing LCO 3.0.4 exceptions not included in the generic CLIIP for TSTF-359 would be considered a plant-specific deviation from the CLIIP and must be justified. As such, please provide justification for the proposed removal of the pre-existing LCO 3.0.4 exceptions from the following HCGS TSs:

<u>TS</u>	<u>DESCRIPTION</u>
3.1.3.1	Control Rod Operability
3.1.3.2	Control Rod Maximum Scram Insertion Times
3.1.3.4	Four Control Rod Group Scram Insertion Times
3.1.3.5	Control Rod Scram Accumulators
3.1.3.6	Control Rod Drive Coupling
3.1.3.7	Control Rod Position Indication
3.2.3	Minimum Critical Power Ratio
3.3.1	Reactor Protection System Instrumentation
3.3.2	Isolation Actuation Instrumentation
3.3.7.1	Radiation Monitoring Instrumentation
3.3.7.4	Remote Shutdown System Instrumentation And Controls
3.3.10	Mechanical Vacuum Pump Trip Instrumentation
3.4.1.1	Recirculation System
3.4.7	Main Steam Line Isolation Valves
3.6.1.3	Primary Containment Air Locks
3.8.4.1	Primary Containment Penetration Conductor Overcurrent Protective Devices
3.8.4.5	Class 1E Isolation Breaker Overcurrent Protective Devices