



10 CFR 50.90

NOV 04 2009

LAR H09-05  
LR-N09-0237

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Hope Creek Generating Station  
Facility Operating License No. NPF-57  
NRC Docket No. 50-354

Subject: **LICENSE AMENDMENT REQUEST (LAR) H09-05  
REVISION TO TECHNICAL SPECIFICATION 4.0.5,  
SURVEILLANCE REQUIREMENTS FOR INSERVICE INSPECTION  
AND TESTING OF ASME CODE COMPONENTS**

In accordance with the provisions of 10 CFR 50.90, PSEG Nuclear, LLC (PSEG) hereby requests an amendment of the Technical Specifications (TS) for the facility operating license listed above.

This license amendment request proposes changes for consistency with the requirements of 10 CFR 50.55a(f)(4) for inservice testing of pumps and valves, and removes TS requirements that are redundant to the requirements of 10 CFR 50.55a. TS 4.0.5 would be revised consistent with NRC-approved Technical Specification Task Force (TSTF) Travelers TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a," TSTF 497, Revision 0, "Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less," and NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4, Revision 3."

PSEG has determined that this LAR does not involve a significant hazard consideration as determined per 10 CFR 50.92. PSEG's technical and regulatory evaluation of this LAR, the TS changes, and the TS Bases changes (for information only), are provided in Attachments 1, 2 and 3. Attachment 4 summarizes the formal regulatory commitments pending NRC approval of the proposed amendment.

The changes in this LAR are not required to address an immediate safety concern. PSEG requests approval of this LAR no later than November 30, 2010. Once approved, the amendment will be implemented within 60 days from the date of issuance.

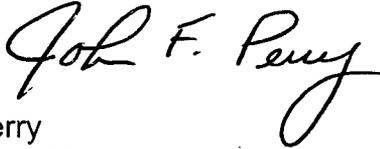
A047  
NRR

Should you have any questions regarding this submittal, please contact Mr. Jeff Keenan at (856) 339-5429.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 11/4/09  
(Date)

Sincerely,



John F. Perry  
Site Vice President  
Hope Creek Generating Station

Attachments (4)

CC

S. Collins, Regional Administrator - NRC Region I  
R. Ennis, Project Manager - USNRC  
NRC Senior Resident Inspector – Hope Creek  
P. Mulligan, Manager IV, NJBNE  
Commitment Coordinator – Hope Creek  
PSEG Corporate Commitment Manager

**LICENSE AMENDMENT REQUEST (LAR) H09-05  
HOPE CREEK GENERATING STATION, NRC DOCKET NO. 50-354  
REVISION TO TECHNICAL SPECIFICATION 4.0.5, SURVEILLANCE  
REQUIREMENTS FOR INSERVICE INSPECTION AND TESTING OF ASME CODE  
COMPONENTS**

Table of Contents

1.	DESCRIPTION .....	1
2.	PROPOSED CHANGE .....	1
3.	BACKGROUND .....	3
4.	TECHNICAL ANALYSIS .....	4
5.	REGULATORY SAFETY ANALYSIS.....	5
5.1	No Significant Hazards Consideration.....	6
5.2	Applicable Regulatory Requirements/Criteria.....	7
5.3	Precedents .....	8
5.4	Conclusions.....	8
6.	ENVIRONMENTAL CONSIDERATION .....	8
7.	REFERENCES .....	8

## 1.0 DESCRIPTION

This submittal requests an amendment to Technical Specification (TS) 4.0.5 of Facility Operating License No. NPF-57, Hope Creek Generating Station. TS 4.0.5, Surveillance Requirements for Inservice Inspections and Testing of ASME Code Components, would be revised to (1) update references to the source of requirements for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves and (2) to address the applicability of Surveillance Requirement (SR) 4.0.2 to some pump and valve testing frequencies. In addition, the revised inservice testing requirements would be relocated to Section 6.0 of TS, while the inservice inspection requirements would be removed from TS as they are redundant to the existing 10 CFR 50.55a ISI Program. The proposed changes are consistent with<sup>1</sup> NRC-approved Technical Specification Task Force (TSTF) Travelers TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a," (Reference 1), TSTF 497, Revision 0, "Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less," (Reference 2), and NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4, Revision 3."

## 2.0 PROPOSED CHANGE

The proposed changes to TS 4.0.5 would provide consistency with (i) TSTF 479, (ii) TSTF 497, and (iii) NUREG-1433:

- (i) TSTF-479 updates references for Inservice Testing of ASME Code Components, providing consistency with the requirements of 10 CFR 50.55a(f)(4) for pumps and valves which are classified as American Society of Mechanical Engineers (ASME) Code Class 1, Class 2 and Class 3. The specification is revised to indicate that the Inservice Testing Program shall include testing frequencies applicable to the ASME Code for Operations and Maintenance (ASME OM Code), replacing the current reference to ASME Section XI.
- (ii) TSTF-497 revises TS 4.0.5 to indicate that there may be some frequencies specified as 2 years or less in the Inservice Testing (IST) Program to which the provisions of SR 4.0.2 are applicable.
- (iii) NUREG-1433 relocates the Inservice Testing (IST) Program portion of TS 4.0.5 to the Administrative Controls section of TS and removes the Inservice Inspection (ISI) Program from TS. The NUREG also removes the superfluous statement that the inservice requirements are in addition to other required surveillances and further clarifies that the provisions of SR 4.0.3 are applicable to the IST Program. Other TS that currently reference TS 4.0.5 are accordingly revised to reference the IST or ISI Programs as appropriate.

---

<sup>1</sup> The changes are consistent with both TSTF-479 and TSTF-497; however, since Hope Creek does not have Improved Standard Technical Specifications (ISTS), NUREG-1433, the impacted TS at Hope Creek are not numbered the same as ISTS, and have minor wording differences. In the Hope Creek TS the IST program is currently TS 4.0.5 (vs. 5.5.7 in ISTS), and the surveillance frequency extension allowance is TS 4.0.2 (vs. 3.0.2 in ISTS).

The specific changes to 4.0.5, additions and deletions, are provided below (see Attachment 2 for complete marked up TS pages):

TS 4.0.5.a will be deleted and replaced with new TS 6.8.4.i:

Inservice Testing Program

This Program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

~~Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50 Sections 50.55a(f) and 50.55a(g) except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(f)(6)(i) or Section 50.55a(g)(6)(i).~~

TS 4.0.5.b, which will be relocated as TS 6.8.4.i.a, is revised to state:

~~Surveillance Intervals specified in Testing frequencies applicable to Section XI of the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable addenda Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:~~

<del>ASME OM Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</del>	<del>Required Frequencies for performing inservice inspection and testing activities</del>
<del>Weekly</del>	<del>At least once per 7 days</del>
<del>Monthly</del>	<del>At least once per 31 days</del>
<del>Quarterly or every 3 months</del>	<del>At least once per 92 days</del>
<del>Semiannually or every 6 months</del>	<del>At least once per 184 days</del>
<del>Every 9 months</del>	<del>At least once per 276 days</del>
<del>Yearly or annually</del>	<del>At least once per 366 days.</del>
<del>Biennially or every 2 years</del>	<del>At least once per 731 days</del>

TS 4.0.5.c, which will be relocated as TS 6.8.4.i.b, is revised to state:

The provisions of Specification 4.0.2 are applicable to the above required frequencies ~~for performing inservice inspection and testing activities.~~ to other normal and accelerated frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities,

TS 4.0.5.d, which will be relocated as TS 6.8.4.i.c, is revised to state:

~~Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements. The provisions of Specification 4.0.3 are applicable to inservice testing activities, and~~

TS 4.0.5.e, which will be relocated as TS 6.8.4.i.d, is revised to state:

~~Nothing in the ASME Boiler and Pressure Vessel OM Code shall be construed to supersede the requirements of any Technical Specification.~~

TS 4.0.5.f will be deleted; the requirements are redundant to Generic Letter (GL) 88-01 requirements in the existing ISI Program required by 10 CFR 50.55a. A commitment to maintain these requirements in the ISI Program is included in this submittal:

~~The Inservice Inspection Program for piping identified in NRC Generic Letter 88-01 shall conform to the staff positions on schedule, methods, and personnel, and sample expansion included in that generic letter, or as otherwise approved by the NRC~~

Sections of the TS Bases are also revised (see Attachment 3) for consistency with the requirements of 10 CFR 50.55a(f)(4). The changes to the affected TS Bases pages will be incorporated in accordance with TS 6.15 "Technical Specifications (TS) Bases Control Program."

### **3.0 BACKGROUND**

The purpose of the IST Program is to assess the operational readiness of pumps and valves, to detect degradation that might affect component operability, and to maintain safety margins with provisions for increased surveillance and corrective action. 10 CFR 50.55a defines the requirements for applying industry codes to each licensed nuclear powered facility. Section XI of the ASME Code has been revised on a continuing basis over the years to provide updated requirements for the inservice inspection and inservice testing of components. Until 1990, the ASME Code requirements addressing the inservice testing of pumps and valves were contained in Section XI, Subsections IWP (pumps) and IWV (valves). Subsequently, the ASME OM Code replaced Section XI of the Boiler and Pressure Vessel Code for inservice testing of pumps and valves. As identified in NRC SECY-99-017 (Reference 4), the NRC has generally considered evolution of the ASME Code to result in a net improvement in the measures for inspecting piping and components and testing pumps and valves. By final rule issued on September 22, 1999 (Reference 5), the NRC amended 10 CFR 50.55a(f)(4)(ii) to require licensees to update their IST Program to the latest approved edition of the ASME OM Code incorporated by reference 5 into 10 CFR 50.55a(b).

TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a," revised the Inservice Testing Program to reflect the latest NRC-approved version of the ASME

Code. TSTF-479 also revised the surveillance extension paragraph of the Inservice Testing Program to state, "The provisions of SR 3.0.2 are applicable to the above required Frequencies and other normal and accelerated Frequencies specified in the Inservice Testing Program for performing inservice testing activities." The NRC approved TSTF-479 (Reference 7) as an administrative change to the Improved Standard Technical Specifications (ISTS) NUREGs. TSTF-479 was incorporated into Revision 3.0 of the ISTS NUREGs.

Subsequently, members of the Component Branch of the NRC stated that TSTF-479 did not provide an adequate justification for applying SR 3.0.2 to Frequencies specified in the Inservice Testing Program as greater than 2 years and the NRC would not approve plant-specific amendments based on TSTF-479 incorporating this change without further justification. The NRC stated that they would accept applying SR 3.0.2 to IST Frequencies not listed in the Inservice Testing Program table provided that those Frequencies are specified in the Inservice Testing Program as 2 years or less. Consequently, TSTF 497, Revision 0, "Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less," was developed to address the "2 years or less" provision, and was subsequently approved by the NRC (Reference 8).

The ISTS were developed based on the criteria in the Final Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors, dated July 22, 1993 (58 FR 39132), which was subsequently codified by changes to Section 36 of Part 50 of Title 10 of the Code of Federal Regulations (10 CFR 50.36) (60 FR 36953). Licensees are encouraged to upgrade their technical specifications consistent with those criteria and conforming, to the practical extent, to Revision 3 to the improved STS. Licensees adopting portions of the ISTS to existing technical specifications should adopt all related requirements, as applicable, to achieve a high degree of standardization and consistency.

#### **4.0 TECHNICAL ANALYSIS**

TS 4.0.5 currently references the ASME Boiler and Pressure Vessel Code, Section XI, as the source of the IST Program requirements for ASME Code 1, 2, and 3 components. The ASME OM Code replaced Section XI of the Boiler and Pressure Vessel Code for inservice testing of pumps and valves. The ASME OM Code applies to the current 10-year IST Interval at Hope Creek. The proposed changes to TS 4.0.5 will provide consistency with the IST requirements of 10 CFR 50.55a.

Additionally, TS 4.0.5 is revised to indicate that the provisions of SR 4.0.2 are applicable to other IST Frequencies that are not specifically listed in the testing frequencies identified in TS 4.0.5. The IST Program may have frequencies (normal and accelerated) for testing that are based on risk or other factors and do not conform to the standard testing Frequencies specified in TS 4.0.5. The Frequency of the Surveillance may be determined through a mix of risk informed and performance based means in accordance with the IST Program. Application of SR 4.0.2 to other

IST Frequencies specified as 2 years or less is consistent with the guidance in NUREG-1482, paragraph 3.1.3 (Reference 6). Consequently, the 25 percent tolerance specified in SR 4.0.2 is applicable to any IST Frequency specified as 2 years or less.

Relocation of the IST Program portion of TS 4.0.5 to Section 6.0 of TS is consistent with the improved Standard Technical Specifications (STS), NUREG-1433. NUREG-1433 established that the IST Program is appropriately located in Section 5.0, "Administrative Controls" (Section 6.0 for Hope Creek). The NUREG also removed the superfluous statement that the inservice requirements are in addition to other required surveillances and further clarifies that the provisions of SR 4.0.3 are applicable to the IST Program (consistent with NUREG-1433, Section 5.5.7.c).

Similarly, NUREG-1433 established that the ISI Program was not required to be maintained in TS (i.e., it did not meet the requirements of 10 CFR 50.36). During each ISI 10-year interval, 10 CFR 50.55a(g)(4) requires PSEG to meet the ISI requirements for ASME Code Class 1, Class 2 and Class 3 components set forth in Section XI of editions of the ASME Boiler and Pressure Vessel Code and Addenda that are incorporated by reference in 10 CFR 50.55a(b) 12 months before the start of the interval. The ISI requirements in current TS SR 4.0.5 are identical and redundant to the requirements of 10 CFR 50.55a. The proposed change does not eliminate any inservice inspections; they are covered by the existing ISI Program required by 10 CFR 50.55a. For inspections determined to be impractical, PSEG will still be required to seek relief in accordance with 10 CFR 50.55a(g)(5).

In addition, the requirements of TS 4.0.5.f, relating to the inspections required by GL 88-01, are redundant to GL 88-01 requirements in the existing ISI Program required by 10 CFR 50.55a. The current GL 88-01 wording in TS 4.0.5.f was included via Amendment 51 (Reference 9), as this was a requirement of the GL (as documented in the Amendment 51 Safety Evaluation). However, subsequent to the GL, the ISI Program was removed from Improved Standard TS (NUREG-1433), as it no longer meets the requirements of 10CFR50.36 for inclusion in TS, as discussed above. Therefore, it is no longer appropriate or consistent to maintain a reference to GL 88-01 inservice inspection requirements in TS<sup>2</sup>. To provide appropriate tracking and control to the original GL 88-01 requirement, a commitment is included in this submittal that incorporates the TS 4.0.5.f wording into the 10CFR50.55a ISI Program. Therefore, TS 4.0.5.f can be deleted.

## 5.0 REGULATORY SAFETY ANALYSIS

The proposed changes revise the requirements in TS 4.0.5, Surveillance Requirements for Inservice Inspections and Testing of ASME Code Components. TS 4.0.5 would be revised to (1) update references to the source of requirements for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves and (2) to address the applicability of

---

<sup>2</sup> In addition, Hope Creek TS 3/4.4.3, Reactor Coolant System Leakage, remains consistent with NUREG-1433 and GL 88-01 requirements.

Surveillance Requirement (SR) 4.0.2 to some pump and valve testing frequencies. In addition, the revised inservice testing requirements would be relocated to Section 6.0 of TS, while the inservice inspection requirements would be removed. The proposed changes are consistent with NRC-approved Technical Specification Task Force (TSTF) Travelers TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a," (Reference 1), TSTF 497, Revision 0, "Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less," (Reference 2), and NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4, Revision 3,"

### 5.1 Significant Hazards Consideration

PSEG has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes revise TS 4.0.5, Surveillance Requirements for Inservice Inspections and Testing of ASME Code Components, for consistency with 10 CFR 50.55a(f)(4) requirements regarding inservice testing of pumps and valves. The proposed change incorporates revisions to the ASME OM Code and clarifies testing frequency requirements for testing pumps and valves. The proposed change also relocates the ISI and IST Programs consistent with NUREG-1433. A commitment is made to maintain GL 88-01 inspection requirements in the ISI Program.

The proposed changes do not impact any accident initiators or analyzed events or assumed mitigation of accident or transient events. They do not involve the addition or removal of any equipment, or any design changes to the facility.

Therefore, the proposed changes do not represent a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed changes do not involve a modification to the physical configuration of the plant (i.e., no new equipment will be installed) or change in the methods governing normal plant operation. The proposed change will not impose any new or different requirements or introduce a new accident initiator, accident precursor, or malfunction mechanism. Therefore, this proposed change does not create the possibility of an accident of a different kind than previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed changes revises and relocates TS 4.0.5, Surveillance Requirements for Inservice Inspections and Testing of ASME Code Components, for consistency with (1) the requirements of 10 CFR 50.55a(f)(4) regarding the inservice testing of pumps and valves and (2) NUREG-1433. The proposed change updates references to the ASME OM Code, clarifies testing frequency requirements for testing pumps and valves, and relocates the IST Program to Section 6.0 of TS, and the ISI Program to a licensee controlled document. The safety function of the affected pumps and valves will be maintained; the programs will continue to be implemented with the required regulations and codes. A commitment is made to maintain GL 88-01 inspection requirements in the ISI Program; there will be no change to these requirements.

Therefore, this proposed change does not involve a significant reduction in a margin of safety.

Based on the above, PSEG concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

## 5.2 Applicable Regulatory Requirements/Criteria

NRC regulation, 10 CFR 50.55a, defines the requirements for applying industry codes to each licensed nuclear powered facility. The regulations require that during successive 120-month intervals, programs be developed utilizing the latest edition and addenda incorporated into paragraph (b) of 10 CFR 50.55a 12 months before the start of the 120-month interval of the operating license subject to the limitations and modifications identified in paragraph (b).

Section 50.55a(f)(4) of Title 10 of the *Code of Federal Regulations* (10 CFR), requires, in part, that ASME Class 1, 2, and 3 components must meet the requirements of the ASME Code. Section 50.55a(f)(4)(ii) requires that IST programs be revised every 10 years (120-months) to comply with the requirements of the latest edition and addenda of the ASME Code that is incorporated by reference in 10 CFR 50.55a(b)(3). Section 50.55a(f)(5)(ii) requires that, if a revised IST program for a facility conflicts with the TS for that facility, the licensee shall apply to the Nuclear Regulatory Commission (NRC or Commission) for amendment of the TS to conform the TS to the revised program. The licensee is required to submit the application, at least 6 months before the start of the period during which the provisions become applicable, in accordance with 10 CFR 50.55a(f)(4).

There are no changes being proposed that would result in non-compliance with any of the regulatory requirements. The evaluations documented above confirm that PSEG will continue to comply with all applicable regulatory requirements.

### **5.3 Precedent**

The NRC accepted TSTF-479 in December 2005 (Reference 7) and TSTF-497 in October 2006 (Reference 8). A similar TS change was approved for the Limerick Generating Station, Amendment No. 194 (Unit 1) and Amendment No. 155 (Unit 2), dated August 28, 2008; and for the Brunswick Steam Electric Plant, Amendment No. 247 (Unit 1) and Amendment No. 275 (Unit 2), dated April 23, 2008. , ..

### **5.4 Conclusions**

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

## **6.0 ENVIRONMENTAL CONSIDERATION**

PSEG has evaluated the proposed amendment for environmental considerations. The review has determined that the proposed amendment would change requirements with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, and would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

## **7.0 REFERENCES**

1. Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-479, Revision 0, "Changes to Reflect Revision of 10 CFR 50.55a"
2. Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-497, Revision 0, "Limit Inservice Testing Program SR 3.0.2 Application to Frequencies of 2 Years or Less"

3. ASME Operation and Maintenance Code for Operation and Maintenance of Nuclear Power Plants, 2001 Edition including the OMa-2002 and OMb-2003 Addenda
4. SECY-99-017, "Proposed Amendment to 10 CFR 50.55a," January 13, 1999
5. Federal Register Notice: Industry Codes and Standards; Amended Requirements, published September 22, 1999 (64 FR 51370)
6. NUREG-1482, Revision 1, "Guidelines for Inservice Testing at Nuclear Power Plants," January 2005
7. Letter dated December 6, 2005, from USNRC to Technical Specifications Task Force
8. Letter dated October 4, 2006, from USNRC to Technical Specifications Task Force
9. Letter from NRC to PSEG, "SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 51 TO FACILITY OPERATING LICENSE NO. NPF-57," dated June 1, 1992

## TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES

## Facility Operating License NPF-57

<u>Technical Specification</u>	<u>Page</u>
4.0.5	3/4 0-3, 4
4.1.5	3/4 1-20
4.4.3.2.2	3/4 4-12
4.4.7	3/4 4-26
4.4.8	3/4 4-27
4.5.1	3/4 5-4, 5
4.6.2.2	3/4 6-15
4.6.2.3	3/4 6-16
4.6.3.3	3/4 6-18
4.7.4	3/4 7-11
6.8.4.i (new)	6-16e (new)
6.10.3	6-22

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

---

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified frequency shall be a failure to meet the Limiting Condition for Operation, except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within its specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified frequency, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met and the applicable Actions must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met and the applicable Actions must be entered.

Pending change  
to TS 4.0.4 per  
LAR H08-06

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

~~4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:~~

~~a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50 Sections 50.55a(f) and 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(f)(6)(i) or Section 50.55a(g)(6)(i).~~

~~b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and~~

APPLICABILITY

SURVEILLANCE REQUIREMENTS (Continued)

~~Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:~~

~~ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities~~      ~~Required frequencies for performing inservice inspection and testing activities~~

<del>Weekly</del>	<del>At least once per 7 days</del>
<del>Monthly</del>	<del>At least once per 31 days</del>
<del>Quarterly or every 3 months</del>	<del>At least once per 92 days</del>
<del>Semiannually or every 6 months</del>	<del>At least once per 184 days</del>
<del>Every 9 months</del>	<del>At least once per 276 days</del>
<del>Yearly or annually</del>	<del>At least once per 366 days</del>

~~c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.~~

~~d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.~~

~~e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.~~

~~f. The Inservice Inspection Program for piping identified in NRC Generic Letter 88-01 shall conform to the staff positions on schedule, methods, and personnel, and sample expansion included in that generic letter, or as otherwise approved by the NRC.~~

REACTIVITY CONTROL SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

---

- b. At least once per 31 days by:
1. Verifying the continuity of the explosive charge.
  2. Determining that the available weight of sodium pentaborate is greater than or equal to 5,776 lbs and the concentration of boron in solution is within the limits of Figure 3.1.5-1 by chemical analysis.\*
  3. Verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.
- c. Demonstrating that, when tested pursuant to the IST Program Specification ~~4.0.5~~, the minimum flow requirement of 41.2 gpm, per pump, at a pressure of greater than or equal to 1255 psig is met.
- d. At least once per 18 months by:
1. Initiating one of the standby liquid control system subsystem, including an explosive valve, and verifying that a flow path from the pumps to the reactor pressure vessel is available by pumping demineralized water into the reactor vessel and verifying that the relief valve does not actuate. The replacement charge for the explosive valve shall be from the same manufactured batch as the one fired or from another batch which has been certified by having one of that batch successfully fired. Both injection subsystems shall be tested in 36 months.
  2. \*\*Demonstrating that all heat traced piping between the storage tank and the injection pumps is unblocked and then draining and flushing the piping with demineralized water.
  3. Demonstrating that the storage tank heaters are OPERABLE by verifying the expected temperature rise of the sodium pentaborate solution in the storage tank after the heaters are energized.

---

\* This test shall also be performed anytime water or boron is added to the solution or when the solution temperature drops below 70°F.

\*\* This test shall also be performed whenever both heat tracing circuits have been found to be inoperable and may be performed by any series of sequential, overlapping or total flow path steps such that the entire flow path is included.

## REACTOR COOLANT SYSTEM

### SURVEILLANCE REQUIREMENTS

---

4.4.3.2.1 The reactor coolant system leakage shall be demonstrated to be within each of the above limits by:

- a. Monitoring the drywell atmospheric gaseous radioactivity at least once per 8 hours (not a means of quantifying leakage),
- b. Monitoring the drywell floor and equipment drain sump flow rate at least once per 8 hours, and
- c. Monitoring the drywell air coolers condensate flow rate at least once per 8 hours, and
- d. Monitoring the drywell pressure at least once per 8 hours (not a means of quantifying leakage), and
- e. Monitoring the reactor vessel head flange leak detection system at least once per 24 hours (not a means of quantifying leakage), and
- f. Monitoring the drywell temperature at least once per 24 hours (not a means of quantifying leakage).

4.4.3.2.2 Each reactor coolant system pressure isolation valve specified in Table 3.4.3.2-1 shall be demonstrated OPERABLE by leak testing pursuant to the IST Program Specification 4.0.5 and verifying the leakage of each valve to be within the specified limit:

- a. At least once per 18 months,\*\* and
- b. Prior to returning the valve to service following maintenance, repair or replacement work on the valve which could affect its leakage rate.

The provisions of Specification 4.0.4 are not applicable for entry into OPERATIONAL CONDITION 3.

4.4.3.2.3 The high/low pressure interface valve leakage pressure monitors shall be demonstrated OPERABLE with alarm setpoints per Table 3.4.3.2-2 by performance of a:

- a. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
- b. CHANNEL CALIBRATION at least once per 18 months.

---

\*\* P.I.V. leak test extension to the first refueling outage is permissible for each RCS P.I.V. listed in Table 3.4.3.2-1, that is identified in Public Service Electric & Gas Company's letter to the NRC (letter No. NLR-N87047), dated April 3, 1987, as needing a plant outage to test. For this one time test interval, the requirements of Section 4.0.2 are not applicable.

REACTOR COOLANT SYSTEM

3/4.4.7 MAIN STEAM LINE ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

---

3.4.7 Two main steam line isolation valves (MSIVs) per main steam line shall be OPERABLE with closing times greater than or equal to 3 and less than or equal to 5 seconds.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

- a. With one or more MSIVs inoperable:
  - 1. Maintain at least one MSIV OPERABLE in each affected main steam line that is open and within 8 hours, either:
    - a) Restore the inoperable valve(s) to OPERABLE status, or
    - b) Isolate the affected main steam line by use of a deactivated MSIV in the closed position.
  - 2. Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. The provisions of Specification 3.0.4 are not applicable.

Pending change  
to TS 3.4.7 per  
LAR H08-06

SURVEILLANCE REQUIREMENTS

---

4.4.7 Each of the above required MSIVs shall be demonstrated OPERABLE by verifying full closure between 3 and 5 seconds when tested pursuant to the IST Program ~~Specification 4.0.5.~~

## REACTOR COOLANT SYSTEM

### 3/4.4.8 STRUCTURAL INTEGRITY

#### LIMITING CONDITION FOR OPERATION

---

3.4.8 The structural integrity of ASME Code Class 1, 2 and 3 components shall be maintained in accordance with Specification 4.4.8.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4 and 5.

#### ACTION:

- a. With the structural integrity of any ASME Code Class 1 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature more than 50°F above the minimum temperature required by NDT considerations.
- b. With the structural integrity of any ASME Code Class 2 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature above 200°F.
- c. With the structural integrity of any ASME Code Class 3 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) from service.

#### SURVEILLANCE REQUIREMENTS

---

4.4.8 No requirements other than the ISI Program ~~Specification 4.0.5.~~

## EMERGENCY CORE COOLING SYSTEMS

### SURVEILLANCE REQUIREMENTS

---

4.5.1 The emergency core cooling systems shall be demonstrated OPERABLE by:

- a. At least once per 31 days:
  1. For the core spray system, the LPCI system, and the HPCI system:
    - a) Verifying by venting at the high point vents that the system piping from the pump discharge valve to the system isolation valve is filled with water.
    - b) Verifying that each valve, manual, power operated or automatic, in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct\* position.
    - c) Verify the RHR System cross tie valves on the discharge side of the pumps are closed and power, if any, is removed from the valve operators.
  2. For the HPCI system, verifying that the HPCI pump flow controller is in the correct position.
- b. Verifying that, when tested pursuant to the IST Program Specification 4.0.5:
  1. The two core spray system pumps in each subsystem together develop a flow of at least 6150 gpm against a test line pressure corresponding to a reactor vessel pressure of  $\geq 105$  psi above suppression pool pressure.
  2. Each LPCI pump in each subsystem develops a flow of at least 10,000 gpm against a test line pressure corresponding to a reactor vessel to primary containment differential pressure of  $\geq 20$  psid.
  3. The HPCI pump develops a flow of at least 5600 gpm against a test line pressure corresponding to a reactor vessel pressure of 1000 psig when steam is being supplied to the turbine at 1000, +20, -80 psig.\*\*
- c. At least once per 18 months:
  1. For the core spray system, the LPCI system, and the HPCI system, performing a system functional test which includes simulated automatic actuation of the system throughout its emergency operating sequence and verifying that each automatic valve in the flow path actuates to its correct position. Actual injection of coolant into the reactor vessel may be excluded from this test.

---

\*Except that an automatic valve capable of automatic return to its ECCS position when an ECCS signal is present may be in position for another mode of operation.

\*\*The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.

EMERGENCY CORE COOLING SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

---

2. For the HPCI system, verifying that:
    - a) The system develops a flow of at least 5600 gpm against a test line pressure corresponding to a reactor vessel pressure of  $\geq 200$  psig, when steam is being supplied to the turbine at  $200 + 15, -0$  psig.\*\*
    - b) The suction is automatically transferred from the condensate storage tank to the suppression chamber on a condensate storage tank water level - low signal and on a suppression chamber - water level high signal.
  3. Performing a CHANNEL CALIBRATION of the CSS, and LPCI system discharge line "keep filled" alarm instrumentation.
  4. Performing a CHANNEL CALIBRATION of the CSS header  $\Delta P$  instrumentation and verifying the setpoint to be  $\leq$  the allowable value of 4.4 psid.
  5. Performing a CHANNEL CALIBRATION of the LPCI header  $\Delta P$  instrumentation and verifying the setpoint to be  $\leq$  the allowable value of 1.0 psid.
- d. For the ADS:
1. At least once per 31 days, performing a CHANNEL FUNCTIONAL TEST of the Primary Containment Instrument Gas System low-low pressure alarm system.
  2. At least once per 18 months:
    - a) Performing a system functional test which includes simulated automatic actuation of the system throughout its emergency operating sequence, but excluding actual valve actuation.
    - b) Verify that when tested pursuant to the IST Program ~~Specification 4.0.5~~, that each ADS valve is capable of being opened.
    - c) Performing a CHANNEL CALIBRATION of the Primary Containment Instrument Gas System low-low pressure alarm system and verifying an alarm setpoint of  $85 \pm 2$  psig on decreasing pressure.

---

\*\*The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.

## CONTAINMENT SYSTEMS

### SUPPRESSION POOL SPRAY

#### LIMITING CONDITION FOR OPERATION

---

3.6.2.2 The suppression pool spray mode of the residual heat removal (RHR) system shall be OPERABLE with two independent loops, each loop consisting of:

- a. One OPERABLE RHR pump, and
- b. An OPERABLE flow path capable of recirculating water from the suppression chamber through an RHR heat exchanger and the suppression pool spray sparger.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

#### ACTION:

- a. With one suppression pool spray loop inoperable, restore the inoperable loop to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With both suppression pool spray loops inoperable, restore at least one loop to OPERABLE status within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN\* within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.6.2.2 The suppression pool spray mode of the RHR system shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve, manual, power operated or automatic, in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.
- b. By verifying that each of the required RHR pumps develops a flow of at least 540 gpm on recirculation flow through the RHR heat exchanger, (after consideration of flow through the closed bypass valve) and suppression pool spray sparger when tested pursuant to the IST Program Specification 4.0.5.

---

\*Whenever both RHR subsystems are inoperable, if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by use of alternate heat removal methods.

CONTAINMENT SYSTEMS

SUPPRESSION POOL COOLING

LIMITING CONDITION FOR OPERATION

---

3.6.2.3 The suppression pool cooling mode of the residual heat removal (RHR) system shall be OPERABLE with two independent loops, each loop consisting of:

- a. One OPERABLE RHR pump, and
- b. An OPERABLE flow path capable of recirculating water from the suppression chamber through an RHR heat exchanger.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

- a. With one suppression pool cooling loop inoperable, restore the inoperable loop to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With both suppression pool cooling loops inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN\* within the next 24 hours.

SURVEILLANCE REQUIREMENTS

---

4.6.2.3 The suppression pool cooling mode of the RHR system shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve, manual, power operated or automatic, in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.
- b. By verifying that each of the required RHR pumps develops a flow of at least 10,160 gpm on recirculation flow through the RHR heat exchanger (after consideration of flow through the closed bypass valve) and the suppression pool when tested pursuant to the IST Program Specification 4.0.5.

\*Whenever both RHR subsystems are inoperable, if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by use of alternate heat removal methods.

## CONTAINMENT SYSTEMS

### SURVEILLANCE REQUIREMENTS

---

4.6.3.1 Each primary containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time.

4.6.3.2 Each primary containment automatic isolation valve shall be demonstrated OPERABLE at least once per 18 months by verifying that on a containment isolation test signal each automatic isolation valve actuates to its isolation position.

4.6.3.3 The isolation time of each primary containment power operated or automatic valve shall be determined to be within its limit when tested pursuant to the IST Program Specification ~~4.0.5~~.

4.6.3.4 At least once per 18 months, verify that a representative sample of reactor instrumentation line excess flow check valves<sup>#</sup> actuates to the isolation position on a simulated instrument line break signal.

4.6.3.5 Each traversing in-core probe system explosive isolation valve shall be demonstrated OPERABLE\*:

- a. At least once per 31 days by verifying the continuity of the explosive charge.
- b. At least once per 18 months by removing the explosive squib from at least one explosive valve such that each explosive squib in each explosive valve will be tested at least once per 90 months, and initiating the explosive squib. The replacement charge for the exploded squib shall be from the same manufactured batch as the one fired or from another batch which has been certified by having at least one of that batch successfully fired. No squib shall remain in use beyond the expiration of its shelf-life or operating life, as applicable.

---

\* Exemption to Appendix J of 10 CFR Part 50.

# The reactor vessel head seal leak detection line (penetration J5C) is not required to be tested pursuant to this requirement.

PLANT SYSTEMS

3/4.7.4 REACTOR CORE ISOLATION COOLING SYSTEM

LIMITING CONDITION FOR OPERATION

=====

3.7.4 The reactor core isolation cooling (RCIC) system shall be OPERABLE with an OPERABLE flow path capable of automatically taking suction from the suppression pool and transferring the water to the reactor pressure vessel.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3 with reactor steam dome pressure greater than 150 psig.

ACTION:

With the RCIC system inoperable, operation may continue provided the HPCI system is OPERABLE; restore the RCIC system to OPERABLE status within 14 days or be in at least HOT SHUTDOWN within the next 12 hours and reduce reactor steam dome pressure to less than or equal to 150 psig within the following 24 hours.

SURVEILLANCE REQUIREMENTS

=====

4.7.4 The RCIC system shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
  - 1. Verifying by venting at the high point vents that the system piping from the pump discharge valve to the system isolation valve is filled with water.
  - 2. Verifying that each valve, manual, power operated or automatic in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.
  - 3. Verifying that the pump flow controller is in the correct position.
- b. When tested pursuant to the IST Program ~~Specification 4.0.5~~ by verifying that the RCIC pump develops a flow of greater than or equal to 600 gpm in the test flow path with a system head corresponding to reactor vessel operating pressure when steam is being supplied to the turbine at 1000 + 20, - 80 psig.\*

---

\*The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.

6.8.4.i INSERVICE TESTING PROGRAM

This Program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as follows:

<u>ASME OM Code and applicable Addenda terminology for inservice testing activities</u>	<u>Required Frequencies for performing inservice testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of Specification 4.0.2 are applicable to the above required frequencies and to other normal and accelerated frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities,

c. The provisions of Specification 4.0.3 are applicable to inservice testing activities, and

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any Technical Specification.

## ADMINISTRATIVE CONTROLS

---

### RECORD RETENTION (Continued)

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Table 5.7.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections ~~performed pursuant to these Technical Specifications.~~
- i. Records of quality assurance activities required by the Quality Assurance Program.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of SORC meetings and activities of the Nuclear Review Board (and activities of its predecessor, the Offsite Safety Review (OSR) staff).
- l. DELETED
- m. Records of analyses required by the radiological environmental monitoring program which would permit evaluation of the accuracy of the analyses at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATIONAL MANUAL and the PROCESS CONTROL PROGRAM.

**TECHNICAL SPECIFICATION BASES PAGES WITH  
PROPOSED CHANGES**  
(Provided for INFORMATION ONLY)

### 3/4.0 APPLICABILITY

#### BASES (Con't)

---

ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to assume that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITIONS of operation.

~~Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.~~

~~This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.~~

~~Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL CONDITION or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision that allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of OPERABLE does not allow a grace period before a component, which is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision that allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.~~

~~This specification includes inservice inspection requirements that conform to the guidance of Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping."~~

### LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by PSEG in this document. Any other statements in this submittal are provided for information only purposes and are not considered to be regulatory commitments.

Regulatory Commitment	Committed Date	Commitment Type	
		One-Time Action (Yes/No)	Programmatic (Yes/No)
The Hope Creek ISI Program, required by 10CFR 50.55a, will include the following requirement: "The Inservice Inspection Program for piping identified in NRC Generic Letter 88-01 shall conform to the staff positions on schedule, methods, and personnel, and sample expansion included in that generic letter, or as otherwise approved by the NRC. "	Concurrent with approval and subsequent implementation of this proposed license amendment	No	Yes