



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 6, 2010

Mr. Thomas Joyce  
President and Chief Nuclear Officer  
PSEG Nuclear LLC  
P.O. Box 236  
Hancocks Bridge, NJ 08038

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
HOPE CREEK GENERATING STATION LICENSE RENEWAL APPLICATION  
FOR BURIED PIPING INSPECTION PROGRAM (TAC NO. ME1832)

Dear Mr. Joyce:

By letter dated August 18, 2009, Public Service Enterprise Group Nuclear, LLC, submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54) for renewal of Operating License No. NPF-57 for the Hope Creek Generating Station. The staff of the U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing this application in accordance with the guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants." During its review, the staff has identified areas where additional information is needed to complete the review. The staff's request for additional information is included in the Enclosure. Further requests for additional information may be issued in the future.

Items in the enclosure were provided to John Hufnagel and other members of your staff, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me by telephone at 301-415-2981 or by e-mail at [bennett.brady@nrc.gov](mailto:bennett.brady@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Bennett M. Brady".

Bennett M. Brady, Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosure:  
As stated

cc w/encl: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE HOPE CREEK  
GENERATING STATION LICENSE RENEWAL APPLICATION FOR BURIED PIPING  
INSPECTION PROGRAM (TAC NO ME1832)

**RAI B.2.1.24**

Background:

The license renewal application (LRA) states that aging management program (AMP) B.2.1.24, Buried Piping Inspection Program, is an existing program with one enhancement and is consistent with the program elements in GALL AMP XI.M34. This AMP addresses buried piping, (i.e., piping in direct contact with soil). The LRA also states that AMP B.2.1.25, External Surfaces Monitoring Program, is a new program and is consistent with the program elements in GALL AMP XI.M36. This AMP addresses aging management of the external surfaces of piping exposed to air, which would normally include underground inaccessible piping (i.e., piping not in direct contact with soil, but located below grade in a vault, pipe chase, or other structure where it is exposed to air and where access is limited).

There have been a number of recent industry events involving leakage from buried and underground piping and tanks.

Issue:

In light of this recent industry operating experience (OE), the staff is concerned about the continued susceptibility to failure of buried and/or underground piping that are within the scope of 10 CFR 54.4 and subject to aging management for license renewal. In reviewing the AMPs cited above along with the applicable aging management review (AMR) items associated with them, the staff is not clear whether: (1) the components addressed by these AMPs clearly include both buried and underground piping (piping which is below grade and contained in a vault or other structure where it is exposed to air and where access is limited); and (2) whether such programs are being updated to incorporate lessons learned from these recent events as well as any OE from the applicant's own history.

Request:

1. Provide a list and a brief summary of any leaks or adverse conditions discovered during inspections (e.g., coating damage that directly exposes the piping or tank to the environment, presence of any coarse material in backfill within six inches of the pipe or tank, unexpected corrosion or damage to piping walls or component pressure boundaries) which have occurred in buried or underground piping or tanks at the station in the past five years that were entered in your corrective action program but are not included in your LRA. Describe how your current AMPs or proposed changes to the AMPs address these issues.
  
2. Provide a discussion of how the AMPs used in managing the aging of buried and underground piping and tanks within the scope of license renewal will address recent industry OE as well as any OE from the applicant's own history.

ENCLOSURE

August 6, 2010

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Sincerely,

*/RA/*

Bennett M. Brady, Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-354

Enclosure:  
As stated

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DATE	08/05/10	06/04/10	08/06/10	08/06/10

OFFICIAL RECORD COPY

Letter to T. Joyce from B. Brady dated August 6, 2010

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