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PSEG
Nuclear LLC

LR-N10-0281

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: Response to Request for Additional Information- Risk Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program

Reference: (1) Letter from PSEG to NRC, "Application for Technical Specification Change Regarding Risk Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program," dated March 19, 2010 (ML100900224)

(2) Email from NRC to PSEG, "Draft Request for Additional Information," dated July 2, 2010 (ML101830347)

In Reference 1 PSEG Nuclear LLC (PSEG) submitted a license amendment request (H10-01) for the Hope Creek Generating Station. Specifically, the proposed change would modify HCGS Technical Specifications (TS) by relocating specific surveillance frequencies to a licensee-controlled program, the Surveillance Frequency Control Program, with the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk Informed Method for Control of Surveillance Frequencies."

The changes are consistent with NRC-approved Industry Technical Specifications Task Force Standard Technical Specification Change Traveler, TSTF-425, Revision 3 "Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b."

In Reference 2 the NRC requested additional information regarding PSEG's license amendment request. The information requested by the NRC and PSEG's responses are in Attachment 1. No new regulatory commitments are established by this submittal.

If you have any questions or require additional information, please contact Mrs. Erin West at (856) 339-5411.

A001
NRR

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

Executed on 7/28/10
(Date)

Sincerely,

Robert C. Braun
Sr. Vice President – Nuclear Operations

Attachments (1)

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 Commitment Coordinator - Corporate

ATTACHMENT 1

HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED LICENSE AMENDMENT FOR RISK-INFORMED JUSTIFICATION
FOR THE RELOCATION OF SPECIFIC SURVEILLANCE FREQUENCY REQUIREMENTS

RAI #1

Table 2.2-1 of Attachment 2 of the application dated March 19, 2010, identifies supporting requirements from the Probabilistic Risk Assessment (PRA) standard for internal events which are not at capability category II as required to support this application. Only four supporting requirements are identified. Does Table 2.2-1 identify all supporting requirements not met at capability category II for the HCGS internal events PRA model, or do the four items represent those judged by the licensee to be relevant to this application? The licensee should clarify the scope of the items in Table 2.2-1 and identify and disposition any other supporting requirements not at capability category II, if applicable.

PSEG Response:

Section 2.2.3 of Attachment 2 of the submittal (Ref. 1) identifies the Supporting Requirements (SR) in Table 2.2-1 as all of the Supporting Requirements (SRs) not meeting capability category II. Thus, there are no other supporting requirements not at capability category II.

RAI #2

With regards to supporting requirement DA-D1, the Table 2.2-1 entry identifies that not all component failure data is based on plant-specific experience, but the importance of this item to the application is not discussed. Instead, it is stated that a majority of important systems use plant-specific data, and then the requirement of Nuclear Energy Institute 04-10 to perform sensitivity studies is identified. The licensee needs to more specifically identify the scope of this deficiency in plant data and characterize why it is not significant for the calculation of risk associated with surveillance frequency extensions for those systems to which the deficiency applies.

PSEG Response:

The systems using plant specific experience for failure rates are those monitored by the MSPI program: HPCI, RCIC, EDGs, RHR, SACS and SSWs. Additionally, plant specific testing and maintenance unavailability data is used for these and other systems. The remainder of the systems use generic data from sources such as NUREG /CR 6928 (Ref. 2). As indicated in the submittal, NEI 04-10 recognizes that the failure rates used in the Surveillance Test Interval (STI) assessments are a key part of the PRA calculations. The NEI 04-10 methodology therefore requires a specific sensitivity on the failure rate for all STI evaluations. This required sensitivity and any other sensitivities arising from assumptions or limitations of the modeling will ensure that a STI is only extended if there is high assurance that the change in risk is acceptable.

References:

1. Application for Technical Specification Change Regarding Risk-informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a licensee Controlled Program, March, 10 2010

2. NUREG/CR 6928 Industry-Average Performance for Components and Initiating Events at U.S. Commercial Nuclear Power Plants