

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 3, 2010

LICENSEE: PSEG Nuclear, LLC

FACILITY: Hope Creek Generating Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON

AUGUST 16, 2010, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND PSEG NUCLEAR, LLC, CONCERNING A DRAFT REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO THE

HOPE CREEK GENERATING STATION LICENSE RENEWAL APPLICATION

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of PSEG Nuclear, LLC (the applicant), and Exelon held a telephone conference call on August 16, 2010, to discuss and clarify the staff's draft request for additional information (D-RAI) concerning the Hope Creek Generating Station license renewal application. The telephone conference call was useful in clarifying the intent of the staff's D-RAI.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a brief summary of the discussion and status of the items. Enclosure 3 contains the D-RAI.

The applicant had an opportunity to comment on this summary.

Bennett M. Brady, Project Manager

Projects Branch 1

Division of License Renewal

Benutt M. Brace

Office of Nuclear Reactor Regulation

Docket Nos. 50-354

Enclosures:

1. List of Participants

2. Summary of meeting discussion

3. Generic D-RAI

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TELEPHONE CONFERENCE CALL HOPE CREEK GENERATING STATION LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS AUGUST 16, 2010

AFFILIATIONS

| Bennett Brady | U.S. Nuclear Regulatory Commission (NRC) | |
|---------------|--|--|
| Raj Aulick | NRC | |

Cliff Doutt **NRC** Bo Pham **NRC** Duc Nguyen **NRC** Samuel Cuadrado De Jesus **NRC** John Hufnagel Exelon Mike Gallagher Exelon Ali Fakhar **PSEG** Don Warfel Exelon John Hilditch **PSEG** Ken Petroff **PSEG** Andy Hak **PSEG** George Daves **PSEG** John Kozakowski Exelon Jim Stavely **PSEG** Phil O'Donnell Exelon

PARTICIPANTS

SUMMARY OF MEETING ON THE DRAFT REQUEST FOR ADDITIONAL INFORMATION FOR HOPE CREEK GENERATING STATION LICENSE RENEWAL APPLICATION

AUGUST 16, 2010

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of PSEG Nuclear, LLC (PSEG) held a telephone conference call on August 16, 2010, to discuss and clarify the draft request for additional information (D-RAI) concerning the Hope Creek Generating Station, license renewal application "Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements" aging management program (AMP).

During the discussion, PSEG discussed their proposal and agreed to:

- 1. Submit a license renewal application supplement that would:
 - a) Revise the "Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements AMP to increase the scope to include inaccessible low voltage power cables from 480 to 2kV that are in the presence of significant moisture.
 - b) Discuss the Hope Creek operating experience concerning inaccessible low voltage power cable failures.
 - c) Discuss that the GALL definition that "significant voltage exposure is defined as being subjected to system voltage for more than twenty-five percent of the time" did not exclude any inaccessible power cable exposed to significant moisture from the program.
 - d) Discuss the frequency of testing and inspection of manholes and cable vaults based on the plant-specific operating experience.

NRC agreed that this was acceptable and the D-RAI would not be necessary.

Generic RAI on Submerged Inaccessible Low Voltage Cables

Plant Name - RAI XXXX-X Inaccessible Cables

Background:

NUREG-1801, Rev. 1, "Generic Aging Lessons Learned," (the GALL Report) addresses inaccessible medium voltage cables in Aging Management Program (AMP) XI.E3, "Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements." The purpose of this program is to provide reasonable assurance that the intended functions of inaccessible medium voltage cables (2 kV to 35 kV), that are not subject to environmental qualification requirements of 10 CFR 50.49 and are exposed to adverse localized environments caused by moisture while energized, will be maintained consistent with the current licensing basis. The scope of the program applies to inaccessible (in conduits, cable trenches, cable troughs, duct banks, underground vaults or direct buried installations) medium-voltage cables within the scope of license renewal that are subject to significant moisture simultaneously with significant voltage.

The application of AMP XI.E3 to medium voltage cables was based on the operating experience available at the time Revision 1 of the GALL Report was developed. However, recently identified industry operating experience indicates that the presence of water or moisture can be a contributing factor in inaccessible power cables failures at lower service voltages (480V to 2kV). Applicable operating experience (OE) was identified in licensee responses to Generic Letter (GL) 2007-01, "Inaccessible or Underground Power Cable Failures that Disable Accident Mitigation Systems or Cause Plant Transients," which included failures of power cable operating at service voltages of less than 2kV where water was considered a contributing factor. The staff has proposed changes to be included in the next revision of the GALL Report AMP XI.E3 to address recently identified operating experience concerning the failure of inaccessible low voltage power cables, which includes general water intrusion as a failure mechanism and increases the scope of program to include power cables greater than or equal to 480V.

<u>lssue</u>:

The staff has concluded, based on recently identified industry operating experience concerning the failure of inaccessible low voltage power cables (480v to 2kV) in the presence of significant moisture, that these cables should be included in an aging management program. The staff notes that your aging management program does not address these low voltage cables.

Request:

 Provide a summary of your evaluation of recently identified industry operating experience and any plant specific operating experience concerning inaccessible low voltage power cable failures within the scope of license renewal (not subject to 10 CFR 50.49 environmental qualification requirements), and how this operating experience applies to the need for additional aging management activities at your plant for such cables. 2. Provide a discussion of how Hope Creek Generating Station will manage the effects of aging on inaccessible low voltage power cables within the scope of license renewal and subject to aging management review; with consideration of recently identified industry operating experience and any plant specific operating experience. The discussion should include assessment of your aging management program description, program elements (i.e., Scope of Program, Parameters Monitored/Inspected, Detection of Aging Effects, and Corrective Actions), and FSAR summary description to demonstrate reasonable assurance that the intended functions of inaccessible low voltage power cables subject to adverse localized environments will be maintained consistent with the current licensing basis through the period of extended operation.

September 3, 2010

LICENSEE: PSEG Nuclear, LLC

FACILITY:

Hope Creek Generating Station

SUBJECT:

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The applicant had an opportunity to comment on this summary.

/RA/

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

Docket Nos. 50-354

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| DATE | 09/01/10 | 09/03/10 | 09/03/10 | 09/03/10 |

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Memorandum to PSEG Nuclear, LLC from B. Brady, dated September 3, 2010

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON

AUGUST 16, 2010, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND PSEG NUCLEAR, LLC, CONCERNING A. DRAFT REQUEST FOR ADDITIONAL INFORMATION PERTAINING TO THE

HOPE CREEK GENERATING STATION, LICENSE RENEWAL APPLICATION

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