



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

September 20, 2010

LICENSEE: PSEG Nuclear, LLC

FACILITY: Hope Creek Generating Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON
AUGUST 18, 2010, BETWEEN THE U.S. NUCLEAR REGULATORY
COMMISSION AND PSEG NUCLEAR, LLC, CONCERNING QUESTIONS
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, and Exelon held a telephone conference call on August 18, 2010, to discuss and clarify the staff's questions concerning the Hope Creek Generating Station license renewal application. The telephone conference call was useful in clarifying the intent of the staff's questions.

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

The applicant had an opportunity to comment on this summary.

A handwritten signature in black ink, reading "Bennett Brady", is positioned above the typed name.

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

Docket No. 50-354

Enclosures:

1. List of Participants
2. Summary of meeting discussion

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TELEPHONE CONFERENCE CALL
HOPE CREEK GENERATING STATION
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
AUGUST 18, 2010

PARTICIPANTS

AFFILIATIONS

Bennett Brady	U.S. Nuclear Regulatory Commission (NRC)
Andrew Prinari	NRC
William Holston	NRC
Michelle Kichline	NRC
Samuel Cuadrado De Jesus	NRC
John Hufnagel	Exelon
Don Warfel	Exelon
Kevin Muggleston	Exelon
Casey Muggleston	Exelon
John Kozakowski	Exelon
Phil O'Donnell	Exelon
Ali Fakhar	PSEG Nuclear
Ron Panko	PSEG Nuclear
John Hilditch	PSEG Nuclear

SUMMARY OF MEETING ON QUESTIONS ON THE
HOPE CREEK GENERATING STATION LICENSE RENEWAL APPLICATION

AUGUST 18, 2010

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of PSEG Nuclear, LLC (PSEG or the applicant) held a telephone conference call on August 18, 2010, to discuss and clarify the questions concerning the Hope Creek Generating Station (Hope Creek) license renewal application (LRA) regarding the Bolting Integrity Program, the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components Program, and Periodic Inspection Program.

QUESTION 1 ON THE BOLTING INTEGRITY PROGRAM

The PSEG response to Hope Creek RAI 3.3.2.3.10-01 states:

The following Summary of Aging Management Evaluations system tables credit the Bolting Integrity Aging Management Program (Hope Creek LRA Appendix B, Section B.2.1.12 Bolting Integrity) to manage aging of carbon and low alloy steel bolting in a soil or groundwater/soil external environment:

- Table 3.3.2-10, Fire Protection System
- Table 3.3.2-27, Service Water System

The tables listed above have line items for carbon and low alloy steel buried bolting which credit the Hope Creek Bolting Integrity aging management program to prevent loss of intended function. The buried carbon steel bolting line items are assigned plant specific notes. The plant specific notes explain that external inspections of buried bolting in these systems will occur in accordance with the frequency outlined in the Buried Piping Inspection Aging Management Program (Hope Creek LRA Appendix B, Section B.2.1.24). These plant specific notes do not indicate exceptions to the inspection recommendations in the GALL Bolting Integrity Program. The intent of these plant specific notes is to indicate that the Bolting Integrity Program will perform buried bolting inspections when buried bolting in these systems is exposed during the directed and opportunistic excavations of buried piping required by the Buried Piping Inspection Program.

Station documentation and site interviews indicate buried bolting in the above listed systems were coated. Some carbon steel bolts in the Fire Protection System have been observed without a coating. However, the Hope Creek Bolting Integrity Program does not take credit for coating or wrapping of buried bolting on any of the above listed systems to prevent loss of intended function.

As indicated above, buried bolts are inspected during the directed and opportunistic excavations of buried piping that are required by the Buried Piping Inspection Program. The buried portion of the Service Water System contains bolting that is ASME Class 3 and inaccessible. GALL AMP XI.M18, Bolting Integrity, recommends that inspections for this system be performed in accordance with ASME Section XI for ASME Class 3 Systems, Sections IWD-2500 and IWD-5000 of ASME Section XI, 2001 Edition with

ENCLOSURE 2

2003 Addenda require a flow test to confirm no significant leakage from pressure retaining ASME Class 3 components.

The remaining buried bolts on the Fire Protection System are non-ASME bolts and are inaccessible. Periodic inspections of inaccessible non-ASME bolts are not recommended by GALL AMP XI.M18, Bolting Integrity, and are not required by ASME Section XI, 2001 Edition with 2003 Addenda.

In the second paragraph of the PSEG response to Hope Creek RAI 3.3.2.3.10-01, the applicant states that inspections will be performed for buried bolting by the frequency outlined in the Buried Piping Inspection aging management program (AMP). However, the wording in the last paragraph implies that they are not performing any inspections for non-ASME buried bolting. Please clarify if the last paragraph actually means that inspections will not be performed for non-ASME buried bolting, or if the paragraph was intended as justification for using the frequency in the Buried Piping Inspection AMP.

RESPONSE:

The applicant responded that inspection of non-ASME buried bolting is not a requirement of the Bolting Integrity according to the Program Basis Document (PBD). However, in the implementing procedures for the AMP, the applicant included the Buried Piping procedures and added a step, which is linked to the Bolting Integrity Program, to inspect any bolting that is exposed during the buried piping inspections. So on the one hand the PBD program description and 10 elements do not say that inspections of non-ASME buried bolting are required. However, procedurally anytime buried bolting is exposed it will be inspected whether it is ASME or non-ASME.

SUMMARY:

The NRC staff found this response to be acceptable as non-ASME bolting will be inspected when exposed during the buried piping inspections.

QUESTION 2 on both: B.2.1.26, Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components, and B.2.2.2, Periodic Inspection

Background:

The SRP-LR, Section A.1.2.3.4, in the "detection of aging effects" program element, recommends that when sampling is used to inspect a group of structures and components (SCs), its population should consider similarity of materials of construction, fabrication, procurement, design, installation, operating environment, or aging effects. Its size should account for the location of SCs, existing technical information, system and structure design, service environment, or previous failure history. The samples should be biased toward locations most susceptible to the specific aging effect of concern in the period of extended

operation, but provisions should be made to expand the sample size when degradation is detected in the initial sample.

Issue:

The AMPs listed above require inspection of a representative sample of material and environment combinations for systems within the scope of each of the referenced programs. However, these AMPs present no details of the proposed sampling plan and provide no assurance that a representative population of sufficient size and scope will be inspected.

Request:

Describe the sampling methodology, including how the population for each of the material-environment-aging effect combinations is being selected, and what type of engineering, design, or operating experience considerations would be used to select the sample of components for both the scheduled and supplemental inspections.

RESPONSE:

- The Programs will ensure that for each material/environment and aging effect combination, representative inspections will be performed as directed by formal preventive maintenance or recurring tasks within the work management system. While the intent is to utilize existing preventive maintenance or recurring task activities, new recurring tasks activities will be implemented to address representative inspection of material/environment and aging effect combinations not adequately addressed by existing activities.
- If adverse conditions are identified (i.e., aging), the condition will be entered into the corrective action program as discussed in the LRA and appropriate actions will be directed, including extent of condition and cause evaluations as appropriate.

SUMMARY:

The staff found the response acceptable as these programs are designed to ensure that each material/environment/aging effect combination would be represented in the inspections and that when degradation is found, it is entered in the corrective actions program.

September 20, 2010

LICENSEE: PSEG Nuclear, LLC

FACILITY: Hope Creek Generating Station, Units 1 and 2

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/RA/

Bennett M. Brady, Project Manager
Projects Branch 1
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NAME	IKing	BBrady	BPham	BBrady
DATE	9/13/10	9/16/10	9/16/10	9/20/10

OFFICIAL RECORD COPY

Memorandum to PSEG Nuclear, LLC from B. Brady, dated September 20, 2010

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON
AUGUST 18, 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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