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United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

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

Subject: Deviation from BWRVIP-25 Inspection Requirements

Reference: BWR Vessel and Internals Project, BWR Core Plate Inspection and Flaw Evaluation Guidelines (BWRVIP-25), EPRI Report TR-107284, December 1996

BWRVIP-25 requires that 50% of the core plate rim hold-down bolts of BWR/2-5 plants without repair wedges be examined by enhanced VT-1 from below the core plate (or by UT from above core plate once the technique is developed). However, it was determined that the bolts cannot be inspected by UT due to configuration issues and it has recently been concluded that an EVT-1 exam does not provide meaningful results. Accordingly, a technical justification for deviation from the BWRVIP guidance was developed.

The technical justification included an analysis that found that the bolting has a relatively low susceptibility to cracking and a very high flaw tolerance. Therefore, postulated flaws would not grow to a size that significantly reduces the bolt preload over the life of the plant. Even if significant cracking did occur in the bolting, redundant structural components will prevent adverse displacement of the core plate. Furthermore, even with the extremely conservative assumptions of failures of both the bolting and the redundant hardware, the Standby Liquid Control (SLC) system could be used to bring the reactor to a safe shutdown.

The BWRVIP is currently working on developing revised guidance for the Core Plate bolts and expects to complete that work, including gaining NRC approval of the revised guidance, by the end of 2015. Given the low likelihood that the function of the core plate will be compromised by bolting failures, there is little risk in postponing inspections of the bolts until such time as the BWRVIP develops revised guidance.

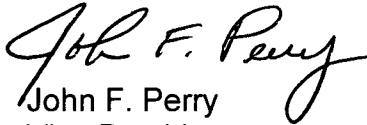
This letter is being transmitted for information only and PSEG Nuclear is not requesting any action from the NRC staff.

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There are no regulatory commitments contained in this correspondence.

Should you have any questions concerning this letter, please contact Phil Duca, at (856)-339-1640.

Respectfully,



John F. Perry
Vice President
Hope Creek Generating Station

Cc: Mr. W. Dean, Administrator – Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. R. Ennis, Project Manager Salem and Hope Creek
U.S. Nuclear Regulatory Commission
One White Flint North
Mail Stop 08 B1A
11555 Rockville Pike
Rockville, MD 20852

USNRC Senior Resident Inspector – Hope Creek (X24)

Jonathan Rowley, NRC
U.S. Nuclear Regulatory Commission
Mail Stop OO12D20
11555 Rockville Pike
Rockville, MD 20852

Matt Mitchell, NRC
U.S. Nuclear Regulatory Commission
Mail Stop O9H6
11555 Rockville Pike
Rockville, MD 20852

P. Mulligan, Manager IV
Bureau of Nuclear Engineering
PO Box 415
Trenton, NJ 08625

Hope Creek Commitment Tracking Coordinator (H02)