



10 CFR 50.55a

LR-N12-0185
June 19, 2012

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

Subject: Submittal of Snubber Program Plans for the Hope Creek Third Ten-Year Inservice Inspection Interval.

In accordance with American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants (ASME OMB Code), Subparagraph ISTA-3200(a), attached for your information is a copy of the Snubber Program Plan for the Hope Creek Third Ten-Year Inservice Inspection Interval.

The Hope Creek Third Ten-Year ISI Interval began on December 13, 2007 and concludes on December 12, 2017.

There are no new commitments contained in this letter. If you have any questions or require additional information, please contact Mr. Lee Marabella at (856) 339-1208.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul R. Duke, Jr.", written in a cursive style.

Paul R. Duke, Jr.
Licensing Manager
PSEG Nuclear LLC

Attachment:

- Hope Creek Nuclear Generating Station Snubber Program Plan - Third ISI Ten-year Inspection Interval

LR-N12-0185

June xx, 2012

Page 2

cc: W. Dean, Administrator, Region I, NRC
NRC Senior Resident Inspector, Hope Creek
J. Hughey, Project Manager, Hope Creek and Salem USNRC
P. Mulligan, Manager IV, NJBNE (w/o attachments)
L. Marabella, Corporate Commitment Tracking Coordinator (w/o attachments)
K. Yearwood, Hope Creek Commitment Tracking Coordinator (w/o attachments)

HOPE CREEK NUCLEAR GENERATING STATION

SNUBBER PROGRAM PLAN

REV. 1

THIRD ISI TEN-YEAR INSPECTION INTERVAL

DECEMBER 13, 2007 TO DECEMBER 12, 2017

Commercial Service Date: December 20, 1986

Hope Creek Nuclear Generating Station

Post Office Box 236

Hancocks Bridge, NJ 08038

PREPARED:  6/4/2012
Bill Brammeier
ISI Program Owner

REVIEWED:  6/11/12
Tim Giles
Peer Reviewer

APPROVED:  6/11/12
Anthony Traylor
Hope Creek Engineering Programs Manager

Snubber Program Plan

Hope Creek Generating Station, Third ISI Interval

REVISION CONTROL SHEET

Major changes to this document should be outlined within the table below.
Editorial and formatting revisions are not required to be logged.

Revision	Date	Revision Summary
0	01/27/12	Initial issuance.
1	4/28/12	1.1, 1.2 and 1.6 Corrected References to LAR and Relief Request HC-13R-04, corrected Code Edition and Addenda. 5.1 Reference the approved use of Code Case OMN-15.

Notes:

1. This Snubber Program Plan is controlled by the Hope Creek Nuclear Generating Station Engineering Programs Department.
2. Revision 1 of this document was submitted to the NRC. Future revisions of this document made within the Third ISI Interval will be maintained and controlled at the station; however, they are not required to be and will not be submitted to the NRC. The exception to this is that new or revised Relief Requests shall be submitted to the NRC for safety evaluation and approval.

Snubber Program Plan

Hope Creek Generating Station, Third ISI Interval

1. General

- 1.1. For the Hope Creek Third ISI Interval as permitted by 10 CFR 50.55a(b)(3)(v), PSEG has submitted Relief Request HC-I3R-04 for use of Code Case OMN-15 and License Amendment Request to remove the Snubber Inspection and test requirements from Technical Specifications (PSEG Letter LR-N08-0150 dated July 30, 2008)
- 1.2. NRC Safety Evaluation Report, dated July 15, 2009 (ML091600683) Amendment No. 179 to License No. NPF-57 approved the relocation of snubber inspection and test requirements to the Technical Requirements Manual. NRC Safety Evaluation Report, dated July 14, 2009 (ML091870040), approved the use of Code Case OMN-15.
- 1.3. The inspection and testing of all safety related Snubbers shall be implemented and performed in accordance with PSEG Nuclear Procedure SH.RA-ST.ZZ-0105(Q), "Snubber Examination & Testing ", to ensure the required operability of these Snubbers during a seismic or other design basis event that initiates dynamic loads.
- 1.4. The Snubber program, as defined within SH.RA-ST.ZZ-0105(Q), establishes visual examination, functional testing and service life monitoring requirements, pertaining to hydraulic safety related Snubbers.
- 1.5. The examination boundaries shall include the Snubber assembly from pin to pin inclusive. Coordination with the ISI program owner will be required to complete the surveillance requirements for piping and structural attachments.
- 1.6. The Snubber Program described in SH.RA-ST.ZZ-0105(Q) adheres to the requirements of ASME OM Code, Subsection ISTA and ISTD 2001 Edition 2003 Addenda.
- 1.7. Hope Creek Generating Station Procedure ER-AA-330-004, in conjunction with SH.RA-ST.ZZ-0105(Q) establishes a Snubber Visual Examination program for Hydraulic Snubbers which adheres to the requirements of ISTD-4200.
- 1.8. Hope Creek Generating Station Procedure ER-AA-330-010, in conjunction with SH.RA-ST.ZZ-0105(Q) establishes a Snubber Functional Testing program for Hydraulic Snubbers

Snubber Program Plan

Hope Creek Generating Station, Third ISI Interval

which adheres to the requirements of ISTD-5000.

- 1.9. Hope Creek Generating Station Procedure ER-AA-330-011, in conjunction with SH.RA-ST.ZZ-0105(Q) establishes a Snubber Service Life Monitoring program for Hydraulic Snubbers which adheres to the requirements of ISTD-6000.

2.0 Examination, Testing and Monitoring Requirements

- 2.1. Visual Examinations and Functional Testing shall be performed to the extent specified within SH.RA-ST.ZZ-0105(Q).
- 2.2. Snubbers are grouped into defined test plan groups (DTPG) by design type, in accordance with ISTD-5252 for testing purposes. The two groups are Lisega Hydraulics and Pacific Scientific Snubbers.
- 2.3. The service life of all Snubbers shall be monitored and Snubbers replaced or reconditioned as required to ensure that the service life is not exceeded between surveillance inspections, during a period when the Snubber is required to be operable.

3.0 Examination and Testing Methods

- 3.1. Visual Examinations shall be performed by individuals qualified in accordance with PSEG Nuclear Procedures using the examination attributes as described in ASME Section XI, IWA-2213. Visual Examinations and Functional Testing shall be performed to meet the requirements specified within SH.RA-ST.ZZ-0105(Q) in accordance with ISTD.

4.0 Examination and Testing Frequency

- 4.1. Visual examinations and functional testing shall be performed at the frequency specified within SH.RA-ST.ZZ-0105(Q), which requires accessible and inaccessible Snubber visual examinations during alternating refueling outages, which results in approximately one half of the Snubber population being examined during each

Snubber Program Plan

Hope Creek Generating Station, Third ISI Interval

refueling outage.

- 4.2. Baseline visual examinations shall be performed whenever new Snubbers are installed, reinstallation of existing or swapped Snubbers that were functionally tested, or after repairs, replacements or modifications.
- 4.3. Functional testing requirements for new installations or spares shall be equal to or more stringent than that specified within SH.RA-ST.ZZ-0105(Q).

5.0 ASME OM Code Case

- 5.1. Hope Creek Snubber Program has implemented Code Case OMN-15 as approved by NRC (ML091870040).

6.0 Examination, Testing and Monitoring Evaluation

- 6.1. Snubbers that do not appear to conform to the Visual Examination requirements of SH.RA-ST.ZZ-0105(Q), shall be reported for evaluation and appropriate corrective action.
- 6.2. Snubbers that do not appear to conform with the visual examination acceptance requirements and are later confirmed as operable as a result of functional testing may be used to accept the Snubber for the purpose of establishing the next visual inspection interval, providing the unacceptable condition did not affect operational readiness.
- 6.3. Snubbers that do not meet the operability testing acceptance criteria in SH.RA-ST.ZZ-0105(Q) shall be evaluated to determine the cause of the failure and appropriate corrective action taken.
- 6.4. The service life of a Snubber is evaluated using manufacturing input and engineering information gained through consideration of the Snubber service conditions and in-service functional test results. Service life monitoring is included in SH.RA-ST.ZZ-0105(Q) and Procedure ER-AA-330-011.

Snubber Program Plan

Hope Creek Generating Station, Third ISI Interval

7.0 **Repair, Replacement and Modification Requirements**

- 7.1. Repairs, Replacements and Modifications performed on Snubbers under this program shall conform, as applicable, to the requirements specified within PSEG Nuclear Repair Program.

8.0 **Scheduling**

- 8.1. The Visual Examinations and Functional Testing schedules shall be established, tracked and maintained by Engineering Programs.
- 8.2. The Snubber database software shall identify and track expanded or additional testing and/or examinations as specified and required by SH.RA-ST.ZZ-0105(Q).

9.0 **Reports and Records**

- 9.1. Reports and records generated during implementation of the Snubber program shall maintained in accordance with RM-AA-101, Records Management Program.