



LR-N17-0127
August 17, 2017

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: Request to Use a Later Edition of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants, 2012 Edition with No Addenda, for the Fourth Inservice Test Interval

- References:**
1. PSEG Letter LR-N15-0250, "Inservice Testing (IST) Program - Fourth Ten-Year Interval," dated December 18, 2015 (ADAMS Accession No. ML15352A127)
 2. PSEG Letter LR-N16-0105, "Request for Additional Information Regarding Relief Requests Associated with the Fourth 10-Year Inservice Test Interval," dated June 10, 2016 (ADAMS Accession No. ML16162A709)
 3. PSEG Letter LR-N16-0174, "Response to Second Request for Additional Information Regarding Relief Request VR-02 Associated with the Fourth 10-Year Inservice Test Interval," dated September 23, 2016 (ADAMS Accession No. ML16267A370)
 4. NRC Letter to PSEG, "Hope Creek Generating Station - Requests for Relief GR-01, PR-01, PR-02, VR-01, AND VR-02, for the Fourth Inservice Testing Interval (CAC Nos. MF7200, MF7201, MF7202, MF7203, AND MF7204) dated December 20, 2016 (ADAMS Accession No. ML16343A057)

Pursuant to 10 CFR 50.55a(f)(4)(iv), and in accordance with the guidance provided in NRC Regulatory Issue Summary (RIS) 2004-12, "Clarification on the Use of Later Editions and Addenda to the ASME OM Code and Section XI," PSEG Nuclear LLC (PSEG) hereby requests NRC approval to use a later edition of the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) for the fourth inservice testing (IST) interval for Hope Creek Generating Station (Hope Creek). Specifically, PSEG proposes to use the 2012 Edition of the OM Code, subject to the conditions in 10 CFR 50.55a(b)(3), for all pumps and valves contained in the Hope Creek IST Program

scope. The approval of the 2012 Edition of the OM Code for use was announced in the Federal Register on July 18, 2017 (82 FR 32934).

Hope Creek is currently in the third IST interval, which uses the 2001 Edition through the 2003 addenda of the OM Code. The current interval, originally scheduled to end on December 20, 2016, is being extended as allowed by ISTA-3120(d). The fourth interval is required to begin no later than December 21, 2017, as required by ISTA-3120(d).

In the Reference 1 letter, as supplemented by the Reference 2 and 3 letters, PSEG submitted relief requests for the fourth interval. In Reference 4, the NRC approved the relief requests as alternatives to the requirements of the 2004 Edition with 2006 Addenda of the OM Code. PSEG intends to use four of the approved relief requests as alternatives to the requirements of the 2012 Edition of the OM Code for the fourth interval as discussed below:

- PSEG Alternative Request PR-01 – Instrument Accuracy for High Pressure Coolant Injection (HPCI) Pump and HPCI Booster Pump Flow Instrumentation

The approved alternative permits use of installed flow instrumentation for HPCI pump and HPCI booster pump inservice testing. As discussed in Reference 2, there are no differences in the applicable code requirements between the 2004 Code Edition with 2006 Addenda and the 2012 Code Edition.

- PSEG Alternative Request PR-02 – Instrument Accuracy for Reactor Core Isolation Cooling (RCIC) Pump Flow Instrumentation

The approved alternative permits use of installed flow instrumentation for RCIC pump inservice testing. As discussed in Reference 2, there are no differences in the applicable code requirements between the 2004 Code Edition with 2006 Addenda and the 2012 Code Edition.

- PSEG Alternative Request VR-01 – Excess Flow Check Valves (EFCVs) Test Frequency

The approved alternative permits EFCV testing to be performed at a frequency specified in Hope Creek Technical Specifications (TS) Surveillance Requirement (SR) 4.6.3.4. As discussed in Reference 2, there are no differences in the applicable code requirements between the 2004 Code Edition with 2006 Addenda and the 2012 Code Edition.

- PSEG Alternative Request VR-02 – Main Steam Safety Relief Valve (SRV) Testing Frequency

The approved alternative permits the Hope Creek SRVs to be tested in accordance with TS SR 4.4.2.2 and 4.4.2.3. As discussed in Reference 2, there are no differences in the applicable code requirement between the 2004 Code Edition with 2006 Addenda and the 2012 Code Edition.

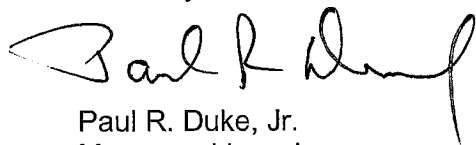
Approved Alternative Request GR-01 permits use of ASME OM Code Case OMN-20, "Inservice Test Frequencies," for flexibility in IST scheduling for pump and valve test frequencies. Because ASME Code Case OMN-20 has been incorporated by reference into

10 CFR 50.55a(a)(1)(iii)(G), and 10 CFR 50.55a(b)(3)(x) allows licensees to implement OMN-20 for editions and addenda of the ASME OM Code listed in 10 CFR 50.55a(a)(1)(iv), including the 2012 edition, PSEG will not require approved relief request GR-01 for the fourth interval.

As noted in RIS 2004-12, licensees seeking to use later editions and addenda of the ASME Code, pursuant to 10 CFR 50.55a(f)(4)(iv) or 10 CFR 50.55a(g)(4)(iv), are not required to request an alternative pursuant to 10 CFR 50.55a(a)(3) (now 10 CFR 50.55a(z)), or to request relief pursuant to 10 CFR 50.55a(f)(5)(iv) or 10 CFR 50.55a(g)(5)(iv). RIS 2004-12 also notes that the regulations do not specify when a licensee must submit a letter requesting approval to use later editions and addenda of the Code, only that the letter must be submitted before using the proposed later Code edition and addenda. Therefore, PSEG plans to update applicable procedures and processes to comply with the provisions of the 2012 Code Edition, subject to the conditions in 10 CFR 50.55a(b)(3), and commence using the proposed later Code Edition at the beginning of the Hope Creek fourth IST interval, scheduled to start no later than December 21, 2017.

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

Sincerely,



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Manager, Licensing

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