50-272/311
50-354

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

November 12, 1997

Mr. Leon R. Eliason
Chief Nuclear Officer & President-
Nuclear Business Unit
Public Service Electric & Gas
Company
Post Office Box 236
Hancocks Bridge, NJ 08038

SUBJECT: INFORMATION PERTAINING TO HOPE CREEK GENERATING STATION AND SALEM NUCLEAR STATION, UNITS 1 AND 2, IMPLEMENTATION OF MODIFICATIONS ASSOCIATED WITH GENERIC LETTER 96-06, "ASSURANCE OF EQUIPMENT OPERABILITY AND CONTAINMENT INTEGRITY DURING DESIGN-BASIS ACCIDENT CONDITIONS" (TAC NOS. M96821, M96860, AND M96861)

Dear Mr. Eliason:

The staff issued Generic Letter (GL) 96-06 on September 30, 1996. The generic letter requested licensees to determine (1) if containment air cooler cooling water systems are susceptible to either waterhammer or two-phase flow conditions during postulated accident conditions, and (2) if piping systems that penetrate the containment are susceptible to thermal expansion of fluid so that overpressurization of piping could occur. By letter dated January 27, 1997, you submitted your 120-day response to GL 96-06 for Hope Creek Generating Station. In addition, by letter dated January 28, 1997, as supplemented October 20, 1997, you submitted your 120-day response to GL 96-06 for Salem Nuclear Generating Station Units 1 and 2. The staff is currently performing a detailed review of your responses.

Implementing corrective actions to resolve the GL 96-06 issues can have a significant impact on outage schedules and resources. Some licensees have indicated that it would be prudent to take more time to better understand the specific concerns that have been identified in order to optimize whatever actions are needed and to assure that they do not ultimately result in a detriment to safety. Current issues and ongoing efforts that could influence a licensee's decision in planning corrective actions include (1) risk implications of installing relief valves to deal with the thermal overpressurization issue, (2) feasibility of using the acceptance criteria contained in Appendix F to Section III of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) for the permanent resolution of the GL 96-06 issues, (3) ongoing tests by the Electric Power Research Institute to support a generic resolution of the overpressurization of piping issue, and (4) questions regarding the staff's closure of Generic Safety Issue 150, "Overpressurization of Containment Penetrations." Risk insights and industry initiatives that are being considered or that may be proposed could also influence the course of action that licensees take to resolve the GL 96-06 issues.

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Licensees are responsible for assessing equipment operability, determining actions, and establishing schedules that are appropriate for resolving the specific conditions that have been identified. In determining the appropriate actions and schedules for resolving GL 96-06 issues, licensees should consider, for example, the continued validity of existing operability determinations, compensatory actions required to maintain operability, the safety significance associated with the specific nonconformances or degraded conditions that have been identified, risk insights, and the time required to complete any generic initiatives and/or plant-specific actions (e.g., engineering evaluations, design change packages, material procurement, and equipment modification and installation). Also, analytical solutions employing the permanent use of the acceptance criteria contained in the ASME Code, Section III, Appendix F (or other acceptance criteria) may present viable alternatives to plant modifications and can be used where appropriate, justified, and evaluated in accordance with NRC requirements such as 10 CFR 50.59, as applicable. Licensees may find the revised guidance contained in GL 91-18, "Information to Licensees Regarding Two NRC Inspection Manual Sections on Resolution of Degraded and Nonconforming Conditions and on Operability," Revision 1, dated October 8, 1997, helpful in determining appropriate actions and schedules. Although adjustments in schedules may be warranted on the basis of these (and other) considerations, specific actions that have been defined and are clearly needed should not be delayed without suitable justification.

It is the staff's current position that licensees can use the ASME Code, Section III, Appendix F, criteria for interim operability determinations for degraded and nonconforming piping and pipe supports until permanent actions have been identified and approved by the NRC (as applicable) for resolving the GL 96-06 issues. This guidance supplements the guidance provided by GL 91-18 for resolution of the GL 96-06 issues.

In order to further facilitate resolution of the GL 96-06 issues, the NRC will participate in a public workshop on this topic later this fall. The workshop proceedings will be summarized by the NRC staff and made publicly available. The need for additional NRC guidance and generic communication will be considered upon completion of the workshop.

If you choose to revise your commitments for resolving the GL 96-06 issues, you should submit a revised response to the generic letter. Your revised response should include appropriate discussion of the considerations discussed above, the current resolution status, and actions remaining to be completed, and plans being considered for final resolution of the GL 96-06 issues.

If you have any questions, please contact me at (301) 415-1430.

Sincerely,

John F. Stolz, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-272, 50-311,
and 50-354

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