



State of New Jersey
Department of Environmental Protection and Energy

Robert C. Shinn, Jr.
Commissioner

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June 28, 1994

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Hope Creek Generating Station
Docket No. 50-354
License Change Request LCR 94-07
Elimination of 10CFR50 Appendix J, Type C Test

On April 25, 1994, Public Service Electric and Gas Company submitted the subject license change request to the Nuclear Regulatory Commission (NRC). The proposed change would eliminate the 10CFR50 Appendix J, Type C leak rate testing for certain Containment Isolation Valves (CIVs), which are located in lines that penetrate the Primary Containment and terminate below the minimum water level in the Torus.

The New Jersey Department of Environmental Protection and Energy's Bureau of Nuclear Engineering reviewed the above amendment in accordance with the requirements of 10CFR50.91(b), and has the following comments.

PSE&G stated in their letter that "This request is based upon an Exemption issued by the NRC on October 30, 1986 for Georgia Power Company's Hatch Nuclear Plant." However, the note on page 1 of Attachment 1 says that this amendment request is not an exemption to 10CFR50 Appendix J, Type C Testing. They are proposing the substitution of ASME XI testing for the subject CIVs. Does it mean an Exemption from Type C testing was issued to Hatch and no substitution with an appropriate ASME test was required? Also, shouldn't the details (CIVs and systems involved) of the Exemption, issued to Hatch, be provided in the Justification Section of this amendment? The BNE believes that an appropriate ASME code case could have been considered for Hatch.

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If you have any questions, please contact Suren Singh at (609) 987-2039 or Rich Pinney at (609) 987-2086.

Sincerely,



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