

Public Service
Electric and Gas
Company

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Vice President Nuclear Operations

FEB 24 1992
NLR-N91220
LCR 91-18

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

LICENSE AMENDMENT APPLICATION
SNUBBER VISUAL INSPECTION INTERVALS
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) hereby submits a request for amendment of Facility Operating License NPF-57 for the Hope Creek Generating Station in accordance with 10 CFR 50.90. A copy of this submittal has been sent to the state of New Jersey as indicated below pursuant to the requirements of 10 CFR 50.91(b)(1).

The proposed change would revise the requirements for snubber visual inspection intervals. This amendment request has been developed, and is being submitted, in accordance with the guidance provided in NRC Generic Letter 90-09, "Alternative Requirements For Snubber Visual Inspection Intervals and Corrective Actions".

Attachment 1 includes a description, justification and significant hazards analysis for the proposed change.

Attachment 2 contains marked up Technical Specification (TS) pages which reflect the proposed change.

PSE&G believes that this submittal contains sufficient technical justification to conclude that a detailed specialist review should not be required and that the proposed change can be classified as a Category 2 change.

Upon NRC approval, please issue a License Amendment which will be effective upon issuance and shall be implemented within 60 days of issuance.

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Should you have any questions or comments on this submittal,
please do not hesitate to contact us.

Sincerely,



Affidavit
Attachments (2)

C Mr. T. T. Martin, Administrator - Region I
U. S. Nuclear Regulatory Commission
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Mr. S. Dembek, Licensing Project Manager
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Mr. T. P. Johnson (S05)
USNRC Senior Resident Inspector

Mr. K. Tosch, Chief
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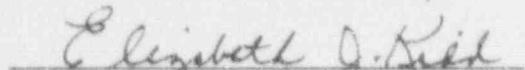
STATE OF NEW JERSEY)
)
COUNTY OF SALEM) SS.

S. LaBruna, being duly sworn according to law deposes and says:

I am Vice President - Nuclear Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth on our letter dated FEB 24 1992, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 24th day of February, 1992


Notary Public of New Jersey

ELIZABETH J. KIDD
Notary Public of New Jersey
My Commission Expires April 25, 1995

My Commission expires on _____

ATTACHMENT 1

REQUEST FOR LICENSE AMENDMENT
SNUBBER VISUAL INSPECTION INTERVALS
FACILITY OPERATING LICENSE NPF-57
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

I. Description of the Proposed Changes

This amendment request proposes to revise the snubber visual inspection requirements which are delineated in Specification 4.7.5. The proposed changes fully incorporate all recommendations delineated in Generic Letter 90-09 which apply to the Hope Creek Generating Station.

II. Reason for the Proposed Changes

Specification 4.7.5 presently delineates a schedule for snubber visual inspections that is based on the number of inoperable snubbers found during the previous visual inspection, irrespective of the size of the population that was tested. Insofar as Hope Creek has a large number of snubbers, 1186 total, this schedule has proven to be excessively restrictive. Compliance with this schedule requires a significant amount of resources and subjects personnel to unnecessary radiological exposure. During the third refueling outage conducted in Winter, 1991, performance of snubber visual inspections accounted for 3.092 man rems.

The proposed changes contained in this submittal would incorporate an alternate schedule for snubber visual inspections which was recommended by the NRC in Generic Letter 90-09. This alternate schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories.

The incorporation of the alternate snubber visual inspection schedule in accordance with Generic Letter 90-09 would reduce future occupational radiological exposure. This philosophy is consistent with the guidance provided in Regulatory Guide 8.10, "Operating Philosophy For Maintaining Occupational Radiation Exposures As Low As Reasonably Achievable", which, in part, states:

"Modifications to operating and maintenance procedures and to plant equipment and facilities should be made where they will substantially reduce exposures at a reasonable cost."

PSE&G is therefore requesting these changes.

III. Justification for the Proposed Changes

All changes proposed in this submittal are encompassed by the discussion and recommendations contained in Generic Letter 90-09. With the exception of minor grammatical and/or administrative differences, all changes that are proposed for the Hope Creek Technical Specifications in Attachment 2 are identical to the changes recommended by the NRC in Enclosure B of Generic Letter 90-09 which apply to Hope Creek. For each difference that exists, an explanation is provided below. Please note that only the differences that effect the proposed changes are discussed.

- The sentence in recommended Specification 4.7.9.c pertaining to "...common hydraulic fluid reservoir..." does not apply to Hope Creek and consequently does not appear in the plant's specifications; therefore, the changes affecting this sentence do not appear in this submittal.
- The intent of the last sentence in Hope Creek specification 4.7.5.c pertaining to "...snubbers common to more than one system..." is fully encompassed and more clearly delineated by the changes in recommended specification 4.7.9.c. This submittal therefore seeks to replace this sentence in its entirety with the recommended changes.
- Table 4.7-2 in the recommended specifications has been changed to Table 4.7.5-1 in order to maintain consistency with the numbering system used in the Hope Creek specifications.
- A typographical error was corrected in Note 4 of the Table ("that" was changed to "than").
- For clarity and ease of use, the verbiage in Note 5 of the table which explains how the previous interval shall be reduced proportionally by interpolation has been re-formatted as a mathematical formula.
- Hope Creek Basis 3/4.7.5 has been changed to reflect the incorporation of Generic Letter 90-09.

IV. Significant Hazards Consideration Evaluation

PSE&G has, pursuant to 10 CFR 50.92, reviewed the proposed amendment to determine whether our request involves a significant hazards consideration. We have determined that operation of the Hope Creek Generating Station in accordance with the proposed changes:

1. Will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes will, in accordance with Generic Letter 90-09, incorporate an alternate snubber visual inspection schedule which maintains the same confidence level as the existing schedule.

2. Will not create the possibility of a new or different kind of accident from any accident previously evaluated.

There are no physical changes to the plant or to the manner in which the plant is operated involved in the proposed revision. Therefore, no new or different accident is created by the proposed change.

3. Will not involve a significant reduction in a margin of safety.

Insofar as the alternate snubber visual inspection schedule proposed in this submittal will maintain the same confidence level as the current schedule, there will be no resultant change in any margin of safety.

V. Conclusion

Based on the preceding discussion, PSE&G has concluded that the proposed change to the Technical Specifications does not involve a significant hazards consideration insofar as the change: (i) does not involve a significant increase in the probability or consequences of an accident previously evaluated, (ii) does not create the possibility of a new or different kind of accident from any accident previously evaluated, and (iii) does not involve a significant reduction in a margin of safety.