PSE&G Public Service Electric and Gas Company

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Robert L. Mittl General Manager
Nuclear Assurance and Regulation

May 31, 1984

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

Attention: Mr. Albert Schwencer, Chief
Licensing Branch 2
Division of Licensing

Gentlemen:

HOPE CREEK GENERATING STATION
DOCKET NO. 50-354
RESPONSE TO GENERIC LETTER 84-11; INSPECTIONS OF BWR STAINLESS STEEL PIPING, DATED APRIL 9, 1984

The following information is submitted in response to those sections of the NRC Generic Letter 84-11 pertinent to Hope Creek Generating Station (HCGS). In accordance with 10CFR50.54(f), three (3) signed originals of the required affidavit are enclosed.

Our review of the generic letter indicates that Items 1 through 5 on pages 1 and 2 are not applicable to HCGS, as they pertain to operating plants.

Public Service Electric and Gas Company's (PSE&G) current plans relative to inspections for intergranular stress corrosion cracking (IGSCC) and leak detection at HCGS are as follows:

Request: Scope and schedule of planned inspections (Page 2, Item (a)).

Response: The Pre-Service Inspection (PSI) program for HCGS is being performed using the ASME Code 1977 Edition, Summer 1978 Addenda of Section XI. All Nuclear Class I welds in the reactor recirculation piping system will be volumetrically inspected.

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PSE&G's In-Service Inspection (ISI) program for HCGS includes a volumetric examination of the Nuclear Class I welds in the recirculation piping system. ISI inspections shall be in accordance with the ASME Code Section XI in effect twelve (12) months prior to commercial operation.

PSE&G is currently engaged with EPRI and Southwest Research Institute (SWRI), the PSI-ISI inspection agency at HCGS, in developing an acceptance program to ultrasonically examine fifty-one (51) corrosion resistant clad (CRC) welds within this boundary.

Techniques developed during the PSI inspection of the CRC welds will be employed during ISI.

Request: Availability and qualification of examiners (Page 2, Item (b)).

Response: Examination techniques, equipment and examination personnel will be qualified to the requirements of NRC Bulletins 82-03 and 83-02 using programs administered by EPRI at the NDE Center, Charlotte, N.C.

Request: Description of any special surveillance measures in effect or proposed, for primary system leak detection, beyond those measures already required by your Technical Specifications (Page 2, Item (c)).

Response: The HCGS Technical Specification will commit to the surveillance measures, techniques and frequencies of surveillance for leak detection. Further, the Technical Specification will identify the unidentified leakage rate and the procedure for dealing with the leakage rate.

Request: Results of the Bulletin inspections not previously submitted to NRC (Page 2, Item (d)).

Response: Not applicable to HCGS.

Request: Remedial measures, if any, to be taken when cracks are discovered (Page 2, Item (e)).

Response: If cracks are uncovered during subsequent ISI at HCGS, PSE&G will utilize the latest industry accepted techniques to accomplish repairs.

PSE&G has been and is currently an active member of the BWROG - Technical Advisory Committee and the EPRI - Nuclear Systems and Materials Task Force. This involvement has provided PSE&G a forum to gather firsthand the results of research into those issues generic to BWRs.

It is significant that PSE&G has completed the following activities which were outlined in the HCGS response submittals to the NRC of September 28, 1979, (R. L. Mittl, PSE&G to Director of Nuclear Reactor Regulation) and July 7, 1981, (R. L. Mittl, PSE&G to D. G. Eisenhut, NRC), on NUREG-0313:

> Measures were taken to minimize the possibility of IGSCC of austenitic stainless steel piping in accordance with NUREG-0313 Rev. 1. The RPV nozzle safe-ends and extensions were replaced with corrosion resistant materials and redesigned to eliminate the thermal sleeves that were part of the pressure boundary and formed crevices. Corrosion resistant cladding was applied to field weld connections of the type 304 stainless steel recirculation system piping and all shop welds were furnace solution heat treated before installation. To minimize the number of stagnant lines, the recirculation system bypass line and control rod drive return line were eliminated. The stainless steel piping in the core spray system and residual heat removal (RHR) system (low-pressure coolant injection line and core spray line) was replaced with impact-tested carbon steel piping from the RPV to the outboard isolation valve of the containment. The RHR shutdown cooling suction and return lines contain type 316L stainless steel transition pieces between the recirculation line connections and the impact-tested carbon steel pipe that extends to the containment outboard isolation valve.

This information is scheduled to be incorporated into the FSAR at a future date. Should you have any questions in this regard, please contact us.

Very truly yours,

R L Mittl/RD Douglas

Enclosure - three (3) signed originals of affidavit

C D. H. Wagner
USNRC Licensing Project Manager

W. H. Bateman
USNRC Senior Resident Inspector

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
DOCKET NO. 50-354

PUBLIC SERVICE ELECTRIC AND GAS COMPANY
HOPE CREEK GENERATING STATION
RESPONSE TO NRC GENERIC LETTER 84-11
INSPECTIONS OF BWR STAINLESS STEEL PIPING

Public Service Electric and Gas Company hereby submits the response to NRC Generic Letter 84-11, Inspections of BWR Stainless Steel Piping, for the Hope Creek Generating Station. The matters set forth in this response are true to the best of my knowledge, information, and belief.

Respectfully submitted,
Public Service Electric
and Gas Company

By: Thomas J. Martin

Thomas J. Martin
Vice President -
Engineering and Construction

Sworn to and subscribed
before me, a Notary Public
of New Jersey, this 31st day
of May 1984.

David K. Burd

DAVID K. BURD
NOTARY PUBLIC OF NEW JERSEY
My Comm. Expires 10-23-85