



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 51 TO FACILITY OPERATING LICENSE NO. NPF-57
PUBLIC SERVICE ELECTRIC & GAS COMPANY
ATLANTIC CITY ELECTRIC COMPANY
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

1.0 INTRODUCTION

By letter dated July 25, 1991, as supplemented by letter dated May 11, 1992, the Public Service Electric & Gas Company (PSE&G) and Atlantic City Electric Company (the licensees) submitted a request for changes to the Hope Creek Generating Station, Technical Specifications (TS). The requested license amendment would change the TS to conform to the NRC staff position on Inservice Inspection (ISI) and monitoring of unidentified leakage as stated in Generic Letter (GL) 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping." Additionally, PSE&G is proposing TS changes to clarify TS 3.4.3.1. TS 3.4.3.1 was found to be confusing and open to different interpretations in an NRC letter dated November 8, 1989. The May 11, 1992 letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 DISCUSSION

NRC GL 88-01, issued January 25, 1988, provided guidance in the form of NRC positions regarding Intergranular Stress Corrosion Cracking (IGSCC) problems in Boiling Water Reactor (BWR) piping made of austenitic stainless steel that is 4 inches or larger in nominal diameter and contains reactor coolant at a temperature above 200°F during reactor power operation, regardless of ASME Code Classification. NRC GL 88-01 requested licensees of operating BWRs and holders of construction permits for BWRs to provide information regarding conformance with the NRC positions. Two of the items which the GL requested licensees to address were: 1) a TS change to include a statement in the TS section on ISI that the program for piping covered by the scope of GL 88-01 will be in conformance with the NRC positions on schedule, methods and personnel, and sample expansion included in the GL, and 2) confirmation of the licensees' plans to ensure that the TS related to leakage detection will be in conformance with the NRC positions on leak detection included in the GL. The NRC position on leakage detection specifically stated that unidentified leakage be limited to an increase of 2 gpm over a 24-hour period, and that leakage be monitored every 8 hours.

By letter dated July 29, 1988, and supplemented on June 2, 1989, PSE&G responded to GL 88-01. By letter dated November 8, 1989, the staff informed PSE&G that their programs were fully acceptable and satisfied all of the requirements in GL 88-01 except for the TSs on ISI and leak detection. Specifically, PSE&G did not propose to incorporate into its TS 1) the unidentified leakage limit of 2 gpm increase in any 24-hour period or less, and 2) a statement regarding a piping ISI program that conforms to the staff positions in GL 88-01.

3.0 EVALUATION

In its July 25, 1991 letter, as supplemented May 11, 1992, PSE&G proposed the following TS changes to fully conform with guidance in GL 88-01 and Supplement 1 to GL 88-01:

1. Add new Surveillance Requirement 4.0.5.f to read "The Inservice Inspection Program for piping identified in NRC Generic Letter 88-01 shall conform to the staff positions on schedule, methods, and personnel, and sample expansion included in that generic letter, or as otherwise approved by the NRC." Additionally, a revision to the applicable bases section was proposed to indicate that TS 4.0.5 conforms to the ISI guidance contained in GL 88-01. The staff has reviewed this proposed TS change and concludes that it meets the intent of GL 88-01. Therefore, the licensees' proposal is acceptable.
2. Rewrite TS 3.4.3.1, LEAKAGE DETECTION SYSTEMS, to clearly identify the individual OPERABILITY requirements and ACTIONs for each leakage detection system. The staff has reviewed this proposed TS change and concludes that it addresses the concerns that the staff previously expressed in an NRC letter dated November 8, 1989. The proposed changes also conform with the guidance of NUREG 1433, BWR 4 Standard Technical Specifications (final draft) and Supplement 1 to GL 88-01. Therefore, the licensees' proposal is acceptable.
3. The licensees requested to add a new Limiting Condition for Operation (LCO) 3.4.3.2.e to read "2 gpm or greater increase in UNIDENTIFIED LEAKAGE within any period of 24 hours or less." With the licensees' concurrence an editorial change was made to the new LCO. The words "or greater" were determined to be unnecessary and left the new LCO open to misinterpretation. For clarity the words "or greater" were deleted. This change was editorial and did not change the intent of the licensees' proposed LCO. The licensees' proposed LCO, as edited, meets the intent of GL 88-01 and is therefore acceptable.

Additionally, a new TS ACTION statement was added to specify actions required when the new LCO is exceeded. With the licensees' concurrence an editorial change was made to the new TS ACTION statement 3.4.3.2.e. The phrase "...exceeding the above limit, implement..." was changed to read "...exceeding the limit in e above,

implement..." This change was made to improve the clarity of the TS ACTION statement and did not change the intent or the applicability of the proposed ACTION statement. The staff has reviewed this proposed TS ACTION statement and concludes that it meets the intent of GL 88-01. Therefore, the licensees' proposal is acceptable.

The licensees' May 11, 1992, letter contained a paragraph to be added to TS Bases Section 3/4.4.3.1. With the licensees' concurrence the staff made editorial changes to the new paragraph. The phrase "...manual quantitative calculation..." was changed to read "...manual quantitative monitoring and calculation..." This editorial change was made to clearly state that the manual method for determining leakage rate involves both monitoring and calculation. Additionally, the phrase "...is of comparable accuracy to..." was changed to read "...should be demonstrated to have accuracy comparable to..." This editorial change was made to improve the clarity of the proposed Bases statement and did not change the intent of the proposed Bases statement.

4. Rewrite parts a, b, c and d of TS 4.4.3.2.1 to change the monitoring frequency from "at least once per 12 hours" to "at least once per 8 hours." The revised monitoring frequency is in conformance with the guidance provided in Supplement 1 to GL 88-01 and the staff's November 8, 1989 letter. Therefore, the licensees' proposal is acceptable.

The above changes did not change the original proposed no significant hazards consideration determination.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Jersey State Official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (56 FR 43812). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: June 1, 1992