



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 48 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 November 29, 1991, and supplemented on January 31, 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 (HCGS) Technical Specifications (TS). The requested changes would revise TS 4.6.1.2.a to allow a one-time interval of 56 months between the first and second Type A Containment Integrated Leakage Rate Tests (ILRT). The present TS interval is  $40 \pm 10$  months. Additionally, the note pertaining to TS 4.6.1.2.d would be deleted. This note allowed a one-time extension, to the first refueling outage, for the Type C test interval, for specific valves. This note is no longer applicable. The supplemental letter did not affect the original no significant hazards determination.

2.0 EVALUATION

Paragraph III.D.1(a) of 10 CFR Part 50, Appendix J (Appendix J) states: "After the preoperational leakage rate tests, a set of three Type A tests shall be performed, at approximately equal intervals during each 10-year service period. The third test of each set shall be conducted when the plant is shutdown for the 10-year plant inservice inspections." In addition to the above quoted Appendix J requirement, Section 4.6.1.2.a of the HCGS TS also specifies that: "Three Type A Overall Integrated Containment Leakage Rate tests shall be conducted at  $40 \pm 10$  month intervals during shutdown at P<sub>0</sub>, 48.1 psig, during each 10-year service period. The third test of each set shall be conducted during the shutdown for the 10-year plant inservice inspection."

In its November 29, 1991 submittal, the licensee stated that the first operational Type A ILRT of the Hope Creek containment was successfully completed during the second refueling outage in November 1989. This was about 33 months after the plant commenced commercial operations. The third Type A ILRT must be completed during the 10-year inservice inspection (ISI) outage scheduled for March through May 1997. Therefore, an option exists as to whether to perform the second test during the fourth or fifth refueling

outage. Completion of the second ILRT during the fourth refueling outage, scheduled for September through November 1992, would result in an interval of 34-36 months between the first and second tests, thus fulfilling the TS limit of  $40 \pm 10$  months. However, this would then result in an interval of 54-56 months between the second and third tests, which exceeds the TS limit by 4 to 6 months. Completion of the second ILRT during the fifth refueling outage, scheduled for March through April 1994, would result in intervals of 52-53 months between the first and second tests and 35-38 months between the second and third tests. In this case the second test interval would exceed the TS limit by 2 or 3 months. The licensee provided the following justification to support its proposed amendment:

1. The intent of the established testing intervals is to conduct three tests at approximately equal intervals within a given ten year period with the third test coinciding with the 10-year ISI outage.
2. The first Type A test was completed successfully during the second refueling outage in November 1989. Since then, there has not been any modifications made to the plant which could adversely effect the test results.
3. Type B and C tests have been completed satisfactorily during each of the three previous Hope Creek outages and are scheduled to be performed during the upcoming fourth refueling outage. Demonstrated operability of the associated components and penetrations provides additional assurance that the integrated containment leakage rate remains satisfactory.
4. Additionally, it should be noted that the most recent Proposed Rule, Appendix J to 10 CFR Part 50 (April 8, 1991), Section III.A.3.c allows a single Type A test interval to be extended for up to 25% of the specified 4-year interval (i.e. up to 60 months). The proposed change to TS 4.6.1.2.a to the fifth refueling outage would remain within the test frequency allowed in the proposed rule.
5. This is a one-time Type A test interval extension request. A new Type A test schedule will be preplanned for the next 10-year service period.

In its January 31, 1992 letter, PSE&G revised its initial request. The TS changes that were originally proposed required the second type A test to be conducted during the fifth refueling outage. In order to provide the flexibility of performing the test prior to the fifth refueling outage due to unforeseen contingencies, PSE&G proposed a maximum 56-month limit between the first and second tests. PSE&G is still planning to conduct the Type A test during the fifth refueling outage. The request for a 56-month interval is based on 53 months between the second and fifth refueling outages plus 3 months for unforeseen scheduling contingencies.

The staff has reviewed PSE&G's submittals and finds that TS 4.6.1.2.a was written to explicitly quantify the Appendix J statement: "... a set of three Type A tests shall be performed at approximately equal intervals during each 10 year service period." The intent of the Appendix J statement and TS 4.6.1.2.a was to allow the licensee to perform the ILRTs at the refueling shutdowns that would provide approximately equal spacing between the ILRTs. It was not intended for the licensee to conduct a shortened cycle in order to perform the ILRT within the  $40 \pm 10$  month TS 4.6.1.2.a surveillance interval. Since the licensee must conduct the third ILRT during the scheduled shutdown for the 10-year ISI and because PSE&G has justified the leaktight integrity of the containment based on previous leakage test results, the staff concludes that a one-time delay of 6 months beyond the permitted test interval will not, for the reasons stated above, have a significant safety impact. The staff, therefore, concludes that PSE&G's proposed TS amendment requesting a delay in conducting the second ILRT meets the intent of Appendix J and is acceptable.

### 3.0 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.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes the surveillance requirements. 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 66928). 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.

### 5.0 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: March 9, 1992