

Public Service
Electric and Gas
Company

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January 25, 1988
NLR-N88011

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

Gentlemen:

ADDITIONAL INFORMATION
INSERVICE TESTING PROGRAM, REVISION 1
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) hereby transmits additional information in support of the Inservice Testing Program (IST), Revision 1, previously submitted in letters from C. A. McNeill, Jr. dated September 21, 1987 and January 14, 1988. Pursuant to discussions with G. W. Rivenbark of your staff on January 21, 1988, PSE&G requests an immediate NRC review for interim approval of the additional information contained in the January 14, 1988 letter. Without this expedited review, a significant startup delay is anticipated in the upcoming refueling outage.

The current NRC schedule for completion of the review of Revision 1 to the Hope Creek Generating Station (HCGS) IST Program (March 1988), along with the time required for any subsequent questions and responses, will not afford PSE&G time to adequately plan and schedule the affected testing activities for the upcoming refueling outage. If interim approval is not immediately addressed, HCGS will not be able to return to service following the upcoming refueling outage. This conclusion is drawn as a result of the ramifications associated with the NRC decision to reject Relief Request V-07, that the HCGS Technical Specifications 4.6.1.2.f and 4.6.1.2.g do not adequately specify leakage criteria for valves associated with the Main Steam Isolation Valve Sealing System and the long term Feedwater sealing system. Without the requested relief from the 1983 ASME Code, Section XI, Paragraph IWV-3426 (which has been granted for other facilities with similar arrangements), design changes must be developed and implemented (including the acquisition of the

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required materials) in order to physically permit the leak rate testing of each individual valve to its own specified leakage criteria. Currently the HCGS Technical Specifications (as well as the specifications for similar facilities) only require leak rate testing each penetration and specifies leakage criteria for the entire sealing system defined by all boundary valves.

PSE&G is available to discuss these two referenced letters, as well as the information provided in this letter regarding system design and the impact on that design if the requested relief is not granted. In order to expedite the review process, PSE&G suggests a meeting during the week of January 25, 1988 to discuss any staff concerns. Your immediate attention to this issue is requested in order for PSE&G to adequately plan and schedule the upcoming HCGS refueling outage.

Should you have any questions or comments, do not hesitate to contact us.

Sincerely,

Steve E. Mittleberg for
CAM

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USNRC Licensing Project Manager

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