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Company

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U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Attention: Dr. Thomas E. Murley,
Regional Administrator

Gentlemen:

INITIAL START-UP TEST PROGRAM CHANGES
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

In accordance with license condition 2.c.11 of Operating License NPF-50 and the provisions of 10 CFR 50.59, Public Service Electric and Gas Company (PSE&G) is submitting 39 copies of the changes made to the Hope Creek Initial Start-up Test Program. This program is described in Chapter 14 of the Final Safety Analysis Report (FSAR). Attachment 1 contains a description, justification, and safety evaluation for each change. Attachment 2 contains the marked up FSAR pages incorporating these changes.

Per the requirements of 10 CFR 50.59, paragraph (a)(2), none of these changes involve an unreviewed safety question. The safety evaluations in Attachment 1 provide the basis for this conclusion.

If you have any questions in regard to this matter, please do not hesitate to contact us.

Sincerely,

CORBIN A. MCNEILL JR.

Attachments

IE01

C Mr. D. H. Wagner
USNRC Licensing Project Manager

Mr. R. W. Borchardt
USNRC Senior Resident Inspector

Mr. J. M. Taylor
Director - Inspection and Enforcement

ATTACHMENT I

Description of Change

An addition was made to FSAR Section 1.8.1.68 to indicate PSE&G's position with respect to Regulatory Guide 1.68, Revision 2, Appendix A, Paragraph 4. This paragraph states that licensees should conduct "appropriate low-power tests (normally at less than 5% power)" to confirm the design and operation of the plant and to validate the analytical models used in the safety analysis. This change indicates that the turbine-generator testing scheduled in the Low-Power Testing Program will be conducted at 10% power rather than the 5% power level. All other low-power testing will be conducted within the 5% power level.

Reason for Change

By initiating turbine roll to rated speed and generator synchronization at a power greater than 5%, we are assured that there is adequate steam for pressure control.

10CFR 50.59 Safety Evaluation

Pursuant to 10CFR 50.59, paragraph (a)(2), the following three questions are responded to in order to determine if an unreviewed safety question is involved in this change.

1. Does the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the FSAR increase?

   No. All safety related equipment that is required to be operable per the Technical Specifications will be operable regardless of whether the plant is at 5% or 10% of rated reactor power. There is no increase in the probability of occurrence of an accident or malfunction of safety equipment that was previously evaluated in the FSAR.

2. Is the probability for an accident or malfunction of a different type than any previously evaluated in the FSAR created?

   No. Existing accident analyses envelope the low power turbine-generator test condition. The probability of an accident or malfunction of a different type than any previously evaluated in the FSAR is not created.

3. Is the margin of safety as defined in the basis for any Technical Specification reduced?

   No. Testing will be performed within the same Technical Specification limits as originally planned. There are no reductions to the Technical Specification margins of safety.

Since the response to these questions is no, the change does not involve any unreviewed safety question.

ATTACHMENT 2

x. Appendix A, Paragraph 5.gg - The ATWS subsystems are thoroughly checked out logically and functionally during the preoperational test program, as described in Sections 14.2.12.1.2.c.6, 14.2.12.1.3.c.3, 14.2.12.1.4.c.4, 14.2.12.1.8.c.9, 14.2.12.1.9.c.7, and 14.2.12.1.10.c.4. The recirculation pump trip (RPT) is tested as part of the recirculation system tests and generator/turbine trips that are performed in Phase III testing.

y. Appendix A, Paragraph 5.ii - Hope Creek design does not incorporate the recirculation flow control valve.

insert A →

1.8.1.68.1 Conformance to Regulatory Guide 1.68.1, Revision 1, January 1977: Preoperational and Initial Startup Testing of Feedwater and Condensate Systems for Boiling Water Reactor Power Plants

HCGS complies with the intent of Regulatory Guide 1.68.1. For further discussion of the initial test program, see Section 14.

1.8.1.68.2 Conformance to Regulatory Guide 1.68.2, Revision 1, July 1978: Initial Startup Test Program to Demonstrate Remote Shutdown Capability for Water-Cooled Nuclear Power Plants

HCGS complies with the intent of Regulatory Guide 1.68.2.

For further discussion of the initial test program, see Chapter 14.

INSERT A

Z. Appendix A, Paragraph 4.0 - For the purpose of initial turbine-generator testing conducted in the Low-Power Testing Program the nominal 5% power limitation will be extended to 10% power. All other low-power testing will be conducted within the 5% power limitation.