



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

FEB 12 1985

Docket No. 50-354

Mr. Richard E. Shapiro, Director
Department of the Public Advocate
Division of Public Interest Advocacy
CN 850
Trenton, New Jersey 08625

Dear Mr. Shapiro:

Subject: Hope Creek Power Ascension Program

By letter dated November 4, 1985 (received December 2, 1985), you notified the NRC of your concern regarding Public Service Electric and Gas Company's (PSE&G) proposal to accelerate the Hope Creek Power Ascension Program (PAP). Your concerns included:

1. The proposed program appears to represent a radical and safety significant departure from current and past NRC practices and from PSE&G's operating license commitments in the Final Safety Analysis Report (FSAR).
2. The truncated testing program will be implemented without sufficient review and evaluation.
3. The precise details of the PSE&G PAP test modifications have not been formulated.
4. PSE&G appears to be proposing to expand its authority under 10 CFR 50.59 to unilaterally make changes, while reducing the NRC's authority under Sections 50.95 and 50.12(a) to regulate licensing amendments and regulatory exemptions.

This letter is in response to your concerns.

Regarding your first comment, at the request of PSE&G, a public meeting (meeting notice issued July 18, 1985) was held on August 1, 1985, to discuss the proposed compression of the Hope Creek PAP. At this meeting, PSE&G identified five methods (and examples of each) by which compression of the PAP could be accomplished. These methods included: 1.) replacing some testing with Technical Specification surveillances, 2.) deleting non-essential testing, 3.) simplifying some tests, 4.) replacing some tests with data from other tests, and 5.) deleting certain Regulatory Guide 1.68 suggested testing. Upon examination of the power ascension tests suggested by Regulatory Guide 1.68, it is evident that many of those tests duplicate each other, are duplicated by technical specification surveillances, or are of such a nature that test results from other tests (performed both at Hope Creek and other boiling water reactor facilities with identical equipment configurations) may be substituted. Although PSE&G is not the first utility to modify PAP tests, it is the first utility to do so on this scale. In all, PSE&G has requested the staff's acceptance on 26 proposed PAP test modifications. In

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our review of each of these 26 proposed modifications we will ensure that adequate justification for the test modifications exists, such that the overall intent of the regulatory guidance is maintained. Overall, we are receptive to PSE&G's approach, and encourage its development.

Regarding your second and third comments, PSE&G requested our review of a total of 26 PAP test modifications by letters dated August 21, September 20 and 30, October 4 and 17, November 6, and December 9, 1985. For each proposed test modification, PSE&G submitted a PSE&G safety evaluation, a General Electric Company (GE) technical evaluation, and marked-up FSAR pages indicating how the FSAR will be amended if the test modification is accepted. These letters have provided sufficient information to permit us to conduct our review. These letters are available for review in the Public Document Room in Washington, DC and the Local Public Document Room in Pennsville, New Jersey. We have initiated a review program for evaluating the proposed test modifications. We have been working closely with NRC Region I personnel in developing staff positions regarding the test modifications to ensure that they are reviewed for both their technical acceptability and their operational acceptability. For each proposed test modification, we will perform a detailed review prior to determining the acceptability of the proposed changes to ensure that the PAP tests demonstrate facility performance and adhere to the intent of the regulatory guidance in place. By letters dated January 22 and February 4, 1986, we forwarded to PSE&G safety evaluations detailing our review of a total of twenty of the proposed test modification. You received copies of these letters as a service list addressee.

Finally, regarding your fourth comment, when PSE&G met with the staff on August 1, 1985, to discuss the PAP, PSE&G identified two methods by which the modifications could be implemented. The first method was to submit the test modifications for staff review prior to licensing. The second method was to submit the test modifications for staff review after licensing, invoking 10 CFR 50.59 (which pertains to licensed facilities only). The applicant and the staff agreed that the best method was the first and that is the method being implemented. Accordingly, PSE&G's authority is not being expanded under 10 CFR 50.59 as 10 CFR 50.59 does not pertain to Hope Creek at this time. Reviewing the modifications prior to licensing is also preferable since it allows the staff more time to review proposed test modifications.

In summary, we believe PSE&G's proposed PAP acceleration represents a feasible approach to eliminating redundant power ascension testing. PSE&G has provided technical justifications for the test modifications and is proceeding in a manner which will allow thorough consideration of the issues at hand. We trust this letter is responsive to your concerns.

In your letter, you stated your desire to meet with the staff to discuss this issue. If you still wish to have a meeting, please contact the Hope Creek Licensing Project Manager, Dave Wagner (301)492-9418.

Elinor G. Adensam

Elinor G. Adensam, Director
BWR Project Directorate No. 3
Division of BWR Licensing

cc: See next page

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Certified By *John M. Ch...*

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Hope Creek Generating Station

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