Public Service
Electric and Gas
Company

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SEP 24 1998

LR-N98453
LCR H97-16

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

Gentlemen:

**SUPPLEMENT TO A REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
FRVS SURVEILLANCE TESTING REQUIREMENTS
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354**

As the result of a June 24, 1998, meeting held between Public Service Electric & Gas (PSE&G) Company and the NRC, PSE&G is providing the following information concerning Hope Creek License Change Request (LCR) H97-16. On August 26, 1997, by letter LR-N97523, Public Service Electric & Gas (PSE&G) Company transmitted LCR H97-16 to the NRC to request a revision to the Technical Specifications (TS) for the Hope Creek Generating Station. In part, LCR H97-16 requested a revision to the wording contained in the Filtration, Recirculation and Ventilation System (FRVS) monthly surveillance requirements. Specifically, Hope Creek proposed changing TS 4.6.5.3.1.b and 4.6.5.3.2.b to state that the FRVS heaters should be "operable" instead of "on" when performing this 10-hour test. This LCR was supplemented with additional information contained letter LR-N98022, dated April 24, 1998.

On June 24, 1998, PSE&G met with NRC representatives to discuss the proposed changes contained in LCR H97-16. On July 16, 1998, the NRC issued a meeting summary for PSE&G-NRC meeting. At that meeting, PSE&G stated that additional information would be provided concerning 18-month FRVS carbon adsorber moisture content testing and FRVS heater control panel temperatures. The primary purpose of this additional information was to demonstrate how the current surveillance activities (where the FRVS heaters are modulating) compare to the surveillance activities prior to 1991 (where the FRVS heaters were dissipating heat for the 10 hour duration of the surveillance) with respect to the ability to dry the carbon adsorber in the FRVS recirculation and ventilation units.

In response to this NRC request, PSE&G has compiled a representative sample of FRVS recirculation and ventilation unit moisture content data for the pre-1991 and post-1991 time periods. The moisture content of the carbon adsorber units was determined by the carbon adsorber vendor (Nucon International, Inc.) as part of their Iodine-131 removal efficiency tests. From an assessment of this data, PSE&G has concluded that: 1) FRVS carbon adsorber maintenance (with the heaters modulating) since 1991 has effectively reduced the carbon adsorber moisture content to levels that are routinely below the moisture content for new carbon adsorbers (approximately 10% by weight) specified by the vendor; and 2) the FRVS carbon adsorber moisture content results since 1991 (with the heaters modulating) are not higher than the moisture content results of the FRVS carbon adsorber unit samples tested prior to 1991 (with the heaters continuously dissipating heat).

In 1991, modifications were made to the FRVS ventilation units (removal of panel door and installation of muffin fans). Following these modifications, the temperatures of the FRVS ventilation unit heater control circuits were significantly lowered. Specifically, the fuse temperature during the 10 hour FRVS ventilation unit surveillance before the modifications was measured to be 220°F, while the post-modification temperature had dropped to approximately 167°F (with only one muffin fan running). These modifications have provided sufficient margin for post accident FRVS ventilation unit heater control circuit operation since post-accident fuse temperatures postulated in the components' qualified life calculations was 227.1°F. For the FRVS recirculation units, fuse temperatures had dropped from approximately 212°F to 155°F after modifications to the control panel door. Similar to the ventilation units, sufficient margin is provided for post-accident operation since fuse temperatures were postulated to be 208°F in the qualified life calculations. In these calculations, PSE&G concluded that the FRVS recirculation and ventilation unit heater control panel components are capable of performing their post-accident safety related functions.

Based upon the above moisture content test results, as well as the Hope Creek FRVS design capabilities, heater setpoint selection, and surveillance testing results described in the aforementioned LCR submittals and as stated in the June 24, 1998, PSE&G-NRC meeting, PSE&G concludes that: 1) the carbon adsorber in the FRVS recirculation and ventilation units are appropriately maintained; and 2) the carbon adsorbers in the FRVS recirculation and ventilation systems are capable of performing their design basis safety functions at anytime during their monthly surveillance test interval. Therefore, PSE&G believes the changes contained in LCR H97-16 are justified.

PSE&G has determined that the information contained in the attachment to this letter does not alter the conclusions reached in the 10CFR50.92 No Significant Hazards analysis previously submitted with LCR H97-16. In accordance with 10CFR50.91(b)(1), a copy of this submittal has been sent to the State of New Jersey.

Should you have any questions regarding this request, please contact James Priest at 609-339-5434.

Sincerely,

E Simpson

Affidavit

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REF: LR-N98453
LCR H97-16

STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

E. C. Simpson, being duly sworn according to law deposes and says:

I am Senior Vice President - Nuclear Engineering of Public Service Electric and Gas Company, and as such, I find the matters set forth in the above referenced letter, concerning Hope Creek Generating Station, Unit 1, are true to the best of my knowledge, information and belief.

E C Simpson

Subscribed and Sworn to before me
this 24th day of September 1998

Kimberly J. Brown
Notary Public of New Jersey

My Commission expires on 6/13/2003