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Nuclear Business Unit

JUN 16 1999

LR-N990295

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

**RELIEF REQUEST RR-A1, CHANGE 1
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354**

Gentlemen:

This letter submits Change 1 to Relief Request RR-A4 that was submitted as part of the Hope Creek Second Interval Inservice Inspection Program on May 11, 1998. The change clarifies requirements regarding snubber visual inspections. Specifically, the change clarifies that, although the frequency of the visual examinations is governed by the Technical Specifications, the requirements associated with performing the examinations are in accordance with the ASME Code. In addition, the change clarifies requirements associated with snubber repair and replacements by requiring that repair and replacements be performed in accordance with ASME Section XI, IWA-4000 and IWA-7000, respectively. The change also includes some editorial changes.

Should you have any questions regarding this response, please contact Mr. C. Manges at 609-339-3234.

Sincerely,

D. R. Powell

Director - Licensing/Regulation & Fuels

Handwritten initials and number: 1/1
A1047

Attachment: Relief Request No. RR-A1, Change 1

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The power is in your hands.

JUN 16 1999

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HOPE CREEK GENERATING STATION
ISI PROGRAM
RELIEF REQUEST RR-A1, CHANGE 1

RELIEF REQUEST RR-A1

NRC Approved (Yes or No): _____ Date _____

COMPONENT DESCRIPTION:

Mechanical and Hydraulic Snubbers

ASME CODE CLASS:

ASME Section XI Class 1, Class 2 and Class 3

ASME EXAMINATION REQUIREMENTS:

Article IWF-5000 requires VT-3 inservice visual examinations and inservice tests of mechanical and hydraulic snubbers. Article IWF-5000 (1989) specifically requires that inservice examinations be performed in accordance with the first Addenda to ASME/ANSI OM-4-1987, Part 4 (published in 1988). This is consistent with the requirements as published in the Federal Register, Vol. 57, No. 152, dated August 6, 1992, on Page 34671 second paragraph, which states: "Licensees are required to implement the rules for examination of snubbers that are provided in OM Part 4 as referenced in Subsection IWF, Article IWF-5000, in the applicable Section XI addenda and edition of this final rule.

This paragraph further states that, "The testing requirements specified in OM Part 4 and referenced in Section XI, Subsection IWF, Article IWF-5000 are not incorporated by reference into § 50.55a." "Requirements for the testing of snubbers are generally governed by plant technical specifications."

BASIS FOR RELIEF:

Pursuant to 10CFR50.55a(g)5(iii), relief is requested from scheduling the inservice VT-3 visual examinations and scheduling and performing inservice (functional) testing to the requirements of the ASME Code.

The Hope Creek Technical Specifications (NUREG-1202) contain specifically developed and approved visual examination scheduling and functional testing requirements. The visual examination scheduling and functional testing will therefore be performed on Code Class 1, 2 and 3 snubbers in compliance with Hope Creek Generating Station Technical Specification 3/4.7.5 and its associated bases and the VT-3 examination in accordance with ASME Section XI.

Performance of examinations and testing to the requirements of the Technical Specification meet some of the Code requirements. However, this approach differs in the areas of examination scheduling, re-examinations and functional testing requirements. Visual examination and testing to the Technical Specification results in an increase in the overall level of plant quality and safety.

RELIEF REQUEST RR-A1 (cont'd)

These Hope Creek snubbers and compensating struts were constructed and installed in accordance with the requirements of ASME Section III, subsection NF. Documentation of fabrication and installation examinations is stored at the plant site. Subsequent to the plant going into operation, these snubbers have been and continue to be visually inspected and functionally tested in accordance with Plant Technical Specifications and ASME Section XI.

ALTERNATIVE EXAMINATION:

Visual examination scheduling and functional testing will be performed on Code Class 1, 2 and 3 snubbers in compliance with the Hope Creek Generating Station's Technical Specification 3/4.7.9 and its associated bases and the VT-3 examination in accordance with ASME Section XI.

NOTE: Repair and Replacements shall be performed in accordance with ASME Section XI, IWA-4000 & IWA-7000 respectively.