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Electric and Gas
Company

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APR 07 1998
LR-N98172

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

**ASME BOILER AND PRESSURE VESSEL CODE
PUMP INSERVICE TESTING RELIEF REQUEST
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354**

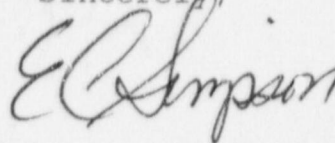
Gentlemen:

Public Service Electric and Gas Company (PSE&G) hereby requests relief from the requirements to declare a pump inoperable if the baseline vibration levels exceed the "required action" levels as prescribed in ASME/ANSI OM-1987, Addenda 1988, Part 6, Section 6. In lieu of declaring the pump inoperable, Hope Creek proposes to provide the ability to analyze the test data and determine if the pump is still capable of performing its intended safety function consistent with the requirements contained in OMC-1994 Addenda (ISTB 6.2.2) and the OM 1995 Edition (ISTB 5.2.2).

Since the request affects the current implementation of the Hope Creek Inservice Testing Program, prompt resolution of this relief request is required. An essentially identical relief request, submitted by Southern Company for Plant Hatch, was reviewed and approved by the NRC in an SER dated, April 12, 1996.

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

Sincerely,



Attachment

AD471/

9804150061 980407
PDR ADOCK 05000354
P PDR

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PUMP RELIEF REQUEST

P - 03

SYSTEM: All included in IST Program

PUMPS: All included in IST Program

CLASS: 2 and 3

TEST REQUIREMENT: OMa-1988, Part 6, Section 6, Paragraph 6.1 states, in part - If deviations fall within the required action range of Table 3, the pump shall be declared inoperable until the cause of the deviation has been determined and the condition corrected.

BASIS FOR RELIEF: The 1983 ASME Section XI Code, subsection IWP-3230(c) stated that;

“Corrective action shall be either replacement or repair per IWP-3111, or shall be an analysis to demonstrate that the condition does not impair pump operability and that the pump will fulfill its function. A new set of reference values shall be established after such analysis.”

The OMc-1994 Addenda (ISTB 6.2.2) and the OM 1995 Edition (ISTB 6.2.2) both state that;

“If the measured test parameter values fall within the required action range of Table 5.2.1-1, Table 5.2.1-2, Table 5.2.2-1, or Table 5.2.3-1, as applicable, the pump shall be declared inoperable until either the cause of the deviation has been determined and the condition is corrected, or an analysis of the pump is performed and new reference values are established in accordance with ISTB 4.6.”

The Code applicable for the first interval IST Program and the latest issued Code both provide for analysis of pump test data in lieu of repair or replacement of the pump if the test parameters fall within the required action range. The OMa Code-1988 Edition did not include such provisions. Communications with members of the OM Code Committee indicate that this was an oversight and that it was never intended to delete the ability to analyze the test data and determine if the pump is still capable of performing its intended safety function.

ALTERNATE
TESTING:

Should pump test parameters fall within the required action range of Table 3 (OMa Code 1988 Edition), then the OM Code 1995 Edition, subsection ISTB 6.2.2 will be utilized. Since subsection ISTB 4.6 in the 1995 Code Edition references ISTB 6.2.2, subsection ISTB 4.6 from the OM Code 1995 Edition will also be applied.