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United States Nuclear Regulatory Commission
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Washington, DC 20555

Gentlemen:

INSERVICE TESTING (IST) PROGRAM, REVISION 1
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) hereby submits Revision 1 to the Hope Creek Generating Station (HCGS) Inservice Testing (IST) Program for pumps and valves. This submittal supercedes the transmittal from R. L. Mittl (PSE&G) to W. Butler (NRC) dated July 21, 1985 and includes changes identified in the attached discussion. PSE&G requests the NRC to conduct a review and provide interim approval by November 2, 1987, i.e. until a complete, detailed review can be accomplished or until April 11, 1988, so that HCGS can implement IST Revision 1 in a timely manner. The basis for interim approval and the expiration date of April 11, 1988, is Facility Operating License NPF-57, License Condition 2.C(3).

Should you have any questions with regard to this transmittal, please do not hesitate to contact us.

Sincerely,

Attachments

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C Mr. G. W. Rivenbark
USNRC Licensing Project Manager

Mr. R. W. Borchardt
USNRC Senior Resident Inspector

Mr. W. T. Russell, Administrator
USNRC Region I

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ATTACHMENT

JUSTIFICATION FOR AND SUMMARY OF THE
HOPE CREEK GENERATING STATION
INSERVICE TESTING PROGRAM REVISION 1

The attached revision to the Hope Creek Generating Station (HCGS) Pump and Valve Inservice Testing (IST) Program supercedes Revision 0 submitted via letter dated July 12, 1985 (R. L. Mittl, PSE&G, to W. Butler, NRC). In accordance with Facility Operating License NPF-57, License Condition 2.C(3) and Supplemental Safety Evaluation Report (SSER) No. 4, Section 3.9.6, Public Service Electric and Gas Company, (PSE&G) was granted interim approval for use of Revision 0 of the IST Program. As discussed below, IST Program, Revision 1 is being submitted to address program management and implementation improvements, update specific testing, revise the format and incorporate various miscellaneous changes. The NRC is requested to review the revised Program and provide the necessary interim approval by November 2, 1987, in order to support timely station implementation.

Salem Generating Station (SGS) Licensee Event Report (LER) 86-02 dated February 28, 1986, identified concerns within SGS regarding the Inservice Inspection and Testing Programs required by 10CFR50.55a. Corrective actions proposed included a review of the IST Program for pumps and valves with a view toward proper assignment of responsibility for various portions of the Program and a clear definition of the content and procedural implementation of the Program. In order to implement the results of this review, both the SGS and the HCGS IST Programs required revision. This submittal of the HCGS IST Program, Revision 1 reflects the results of this review.

A key element to the redefinition of the IST Program's organizational structure and responsibility requirements was the HCGS System Engineering review of all station pumps and valves. This group is responsible for identifying the safety function for each component which forms the true basis for the IST Program. Therefore, Revision 0 of the IST Program has been changed to either amend or delete components whose safety function was not originally properly defined. Section 2 of the attached Program summarizes the changes between Revision 0 and Revision 1 and includes a brief description for those items being deleted.

This submittal also incorporates the requirements of ASME Code, Section XI, 1983 Edition with Addenda up to and including the Summer of 1983, rather than the 1980 Edition with Addenda up to and including the Winter of 1981 identified in Revision 0, as permitted by 10CFR50.55a(g)(4). This code update was initiated in order for the IST Program and the Inservice Inspection (ISI)

Program to adhere to the same requirements. The reason for the upgrade is to maintain consistency between the two Programs such that testing, repair, replacement and modification of components follows the same requirements. This upgrade has been incorporated throughout the submittal; however, since the two code editions do not contain any major differences in testing requirements, a specific summary of these changes is not necessary.

The IST Program has been revised to incorporate additional components not previously identified within the program. Examples of these changes include excess flow check valves (and their subsequent relief requests) and the documentation of 10CFR50, Appendix J testing. These changes have been made to identify all pump and valve testing within one document - the IST Program. Additionally, due to the System Engineering review discussed above, improved system testing has been identified; therefore, the IST Program has been updated to document changes in various component's test frequencies. These changes are conservative in nature in that the change in test frequency permits several components to meet the requirements of the code and hence eliminates the need for associated relief requests. These changes are listed in Section 2 while the individual relief requests appear in Section 5.

Finally, the program has been reformatted to enhance cross-references between documents when using or reviewing the Program. Changes include additional descriptive identifiers for pumps, valves and valve operators, how these components are tested including the test requirements, and a revision to the relief requests to facilitate cross-referencing to the specific components for which relief is sought, and vice-versa.

A review of Section 2, a comparison to the Revision 0, IST Program and Section 5, a summary of the relief requests, provide the best method of comparing the July 12, 1985, Revision 0 submittal with this submittal. The IST Program identifies pumps and valves with safety functions and documents compliance with ASME code with the exception of those components identified in Section 5. In this latter case, compliance with the code is either not attainable, not practical or testing is accomplished in another manner for which credit is taken. Regardless, the appropriate justification is provided.