

ENCLOSURE 1

**HOPE CREEK GENERATING STATION
IMPROVED TECHNICAL SPECIFICATIONS SUBMITTAL**

**CONTENTS OF THE HOPE CREEK
IMPROVED TECHNICAL SPECIFICATIONS (ITS) SUBMITTAL**

(25 TOTAL PAGES, INCLUDING COVER SHEETS)

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CONTENTS OF THE HOPE CREEK GENERATING STATION IMPROVED TECHNICAL SPECIFICATIONS SUBMITTAL

Executive Summary

The proposed changes from the Hope Creek Generating Station (Hope Creek) current Technical Specifications (CTS) to the Improved Technical Specifications (ITS) are based on Revision 5.0 of NUREG 1433, "Standard Technical Specifications – General Electric BWR/4 Plants." Generic BWR/4 Improved Standard Technical Specification (ISTS) changes (Technical Specification Task Force (TSTF) change travelers) incorporated into NUREG-1433, up to and including Revision 5.0, apply to Hope Creek and have been incorporated into the Hope Creek ITS without deviation, except where noted in this ITS Conversion LAR in the Justification for Deviations. Table 1 of this enclosure lists notable TSTF travelers and status of Hope Creek adoption of these TSTF travelers into the CTS. There are two additional Nuclear Regulatory Commission (NRC) approved TSTF change travelers since approval of NUREG-1433, Revision 5, addressed in this license amendment request. TSTF-GG-13-01, "Improved Technical Specifications Conversion Guidance," Revision 0, was used to prepare the content of the license amendment request. Additionally, there are no linked Hope Creek submittals associated with this ITS license amendment request.

Risk Informed Initiatives

Several risk informed initiatives incorporated into the ISTS and associated Bases specified in NUREG-1433, Revision 5.0, have been previously approved and incorporated into the Hope Creek Technical Specifications. Therefore, information related to the NRC reviewer notes provided in the ISTS and ISTS Bases associated with these risk informed initiatives are provided in this ITS Conversion LAR. PSEG is not adopting TSTF-505, Revision 1, "Provide Risk-Informed Extended Completion Times - RITSTF Initiative 4b" at this time. Therefore, the Hope Creek ITS does not include Risk Informed Completion Times in the Specifications or a Risk Informed Completion Time Program in ITS Chapter 5.

Surveillance Frequency Control Program (TSTF-425)

Hope Creek previously adopted a Surveillance Frequency Control Program (SFCP) on February 25, 2011, in License Amendment 187 (NRC ADAMS Accession No. ML103410243). In the NRC safety evaluation accompanying the SFCP amendments, the NRC concluded that the adoption of TSTF-425, Revision 3, and risk-informed methodology of NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1, as referenced in the Administrative Controls section of the Technical Specifications, satisfies the key principles of risk-informed decisionmaking applied to the relocated Surveillance frequencies as delineated in Regulatory Guide 1.177, Revision 1, and Regulatory Guide 1.174, Revision 2. Changes to Surveillance frequencies listed in the SFCP are made in accordance with NEI 04-10, Revision 1, as specified in CTS Chapter 6 (ITS Chapter 5).

Technical Specifications End States (TSTF-423)

Hope Creek is requesting to adopt TSTF-423, "Technical Specifications End States, NEDC-32988-A," Revision 1. As stated in several NRC reviewer notes in the ISTS Bases, the adoption of a MODE 3 end state requires the licensee to make commitments to follow the guidance established in Section 11 of NUMARC 93-01, "Industry Guidance for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants," Nuclear Management and Resource Council, Revision [4F] and to follow the guidance established in TSTF-IG-05-02, "Implementation Guidance for TSTF-423, Rev. 1, 'Technical Specifications End States, NEDC-32988-A,'" Revision 2, November 2009. TSTF-IG-05-02 states that implementation of the preferred end states initiative requires some modification of the current program for implementing 10 CFR 50.65(a)(4), the Maintenance Rule. These modifications are intended to preclude preventive maintenance and operational activities being performed on equipment combinations that could lead to reduced defense-in-depth and potentially high risk configurations, and to identify actions for expeditiously exiting a risk-significant configuration should it occur. These modifications are discussed in TSTF-IG-05-02 and require plants submitting a license amendment to adopt the preferred end states, described in NEDC-32988-A and TSTF-423, to commit to following the guidance in TSTF-IG-05-02.

PSEG Nuclear LLC (PSEG) has previously committed to assess and manage risk at HCGS in accordance with the guidance of NUMARC 93-01, Rev. 4F, Section 11 (e.g., Amendment 228 (ADAMS Accession No. ML21098A087)). In addition, PSEG commits to following the guidance of TSTF-IG-05-02 when evaluating the use of the risk-informed preferred end states at HCGS as indicated in Enclosure 5.

Industry Initiatives Proposing to Adopt

Additionally, several notable non-risk informed industry initiatives are requested to be adopted as indicated in Table 1 to this enclosure. Information related to the associated adoption of these initiatives is provided in the ISTS and ISTS Bases.

Battery Monitoring and Maintenance Program (TSTF-500)

The Battery Monitoring and Maintenance Program is included to provide for battery restoration and maintenance per the guidance of IEEE 450-2010, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications." The Notice of Availability for TSTF-500, Revision 2, "DC Electrical Rewrite - Update to TSTF-360," (76FR54510) references the model application and safety evaluation for plant-specific adoption of TSTF-500, Revision 2 (NRC ADAMS Accession No. ML111751792). PSEG has verified the applicable information specified in Section 2.2 of the TSTF-500 model application, including applicable UFSAR information. PSEG has verified the following information in support of the Hope Creek adoption of TSTF-500, Revision 2:

- A letter has been obtained from the manufacturer of the batteries used at Hope Creek verifying the acceptability of using float current monitoring instead of specific

gravity monitoring as a reliable and accurate indication of the state-of-charge of the battery and that this will hold true over the life of the battery.

- The battery room temperature is routinely monitored such that a room temperature excursion could reasonably expect to be detected and corrected prior to the average battery electrolyte temperature dropping below the minimum electrolyte temperature.
- The measurement equipment used to monitor float current has the necessary accuracy and capability to measure electrical currents in the expected range.
- The cell resistance limits in CTS 4.8.2.1 are relocated to the Battery Monitoring and Maintenance Program.
- The modified performance discharge test completely encompasses the load profile of the battery service test and that it adequately confirms the intent of the service test to verify the battery capacity to supply the design basis load profile.

Commitments associated with TSTF-500 are provided in Enclosure 5. A description of the UFSAR changes associated with TSTF-500 are provided in Enclosure 6. Commitments and UFSAR revision packages associated with TSTF-500 will be completed prior to implementation of the ITS Amendment.

Proposed NRC Approved Travelers not in NUREG-1433 Revision 5

Two NRC approved TSTF travelers not incorporated into NUREG-1433, Revision 5 are proposed to be adopted.

Eliminate Automatic RWCU System Isolation on SLC Initiation (TSTF-584)

For the reduction of risk from an Anticipated Transient Without Scram (ATWS) event for Boiling Water Reactors (BWRs), 10 CFR 50.62(c)(4) states that the Standby Liquid Control (SLC) System initiation must be automatic and must be designed to perform its function in a reliable manner for plants granted a construction permit after July 26, 1984, and for plants granted a construction permit prior to July 26, 1984, that have already been designed and built to include this feature. Hope Creek voluntarily committed to incorporate a Redundant Reactivity Control System (RRCS) to automatically initiate ATWS features in order to bound possible future NRC requirements for ATWS. However, the SLC System alternately can be manually initiated by the operators as directed by plant emergency operating procedures.

Since the Reactor Water Cleanup (RWCU) System isolation signal on SLC System initiation is a fail-close signal for the RWCU system return isolation valves, it complicates plant maintenance evolutions that interrupt power to the signal, resulting in isolation of the RWCU system. Isolation of the RWCU System has an undesirable effect on reactor coolant system chemistry. Restarting the RWCU System is a lengthy process that requires warming the of system prior to starting the pump, typically requires control room and field actions, and diverts operator attention from more safety significant tasks. Further, shutdown and restart of the RWCU System increases wear on the pump motors. The RWCU System motors and pumps are typically replaced

together as a unit requiring extensive maintenance being conducted in a high radiation area.

The NRC staff found that the changes specified in TSTF-584 satisfy 10 CFR 50.36(c)(2)(i) and 10 CFR 50.62(b) because the specified acceptable fuel design limits will not be affected during an ATWS event and remedial actions to be taken until each limiting condition for operation (LCO) can be met continue to provide adequate protection to the public health and safety.

PSEG has reviewed the NRC safety evaluation associated with TSTF generic traveler TSTF-584 provided in an NRC letter to the TSTF dated July 31, 2023. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-584. Although the ATWS analysis assumes that the SLC System is automatically initiated by the RRCS, PSEG confirms that the SLC System can also be manually initiated from the main control room by operators in accordance with the plant emergency operating procedures within the timing assumptions in the ATWS analysis. PSEG further confirms that the ATWS analysis shows that reactor water level will reach the Reactor Vessel Water Level – Low Low, Level 2 to support automatic isolation of the RWCU System. Therefore, PSEG has concluded that the justifications presented in TSTF-584 and the safety evaluation prepared by the NRC staff are applicable to Hope Creek. As such, this NRC approved change to NUREG-1433 is included in the ITS Conversion LAR.

Revise Automatic Depressurization System (ADS) Instrumentation Requirements (TSTF-592)

The OPERABILITY of the ECCS instrumentation is dependent upon the OPERABILITY of the individual instrumentation Functions specified in ISTS Table 3.3.5.1-1. Each Function must have a required number of OPERABLE channels. When a channel is discovered inoperable, in applicable MODES or other specified conditions, ISTS 3.3.5.1 Condition A is entered for that channel and provides for transfer to the appropriate subsequent Condition by Required Action A.1. Required Action A.1 directs entry into the appropriate Condition referenced in Table 3.3.5.1-1. The applicable Condition referenced in Table 3.3.5.1-1 is Function dependent.

NUREG-1433 Table 3.3.5.1-1 currently references Condition G for ECCS Instrumentation Functions 4.c, 4.e, 4.f, 4.g, 4.h, 5.c, 5.e, 5.f, 5.g, and 5.h. Inoperability of a single ECCS instrumentation channel associated with the subject instrument Functions ultimately, if not restored after a maximum of 8 days, results in entry into Condition H, requiring immediate declaration of the ADS valves as inoperable, and a plant shutdown.

Traveler TSTF-592 proposes to revise the ADS instrumentation remedial action requirements contained in the ECCS instrumentation specification, ISTS 3.3.5.1, to correct overly restrictive action requirements, and to treat less significant channel inoperabilities consistently.

The NRC staff concluded that the proposed changes to ISTS 3.3.5.1 for BWR/4 and BWR/6 in Traveler TSTF-592 are acceptable because the remedial actions to be taken until the LCO can be met provide protection to the health and safety of the public. The

NRC staff also concluded that there is reasonable assurance that plants adopting TSTF-592 will continue to ensure that when LCO 3.3.5.1 is not met, the licensee will shut down or follow any remedial action permitted by the Technical Specifications until the condition can be met.

PSEG has reviewed the NRC safety evaluation associated with TSTF generic traveler TSTF-592 provided in an NRC letter to the TSTF dated January 31, 2024. This review included a review of the NRC staff's evaluation, as well as the information provided in TSTF-592. PSEG has concluded that the justifications presented in TSTF-592 and the safety evaluation prepared by the NRC staff are applicable to Hope Creek. As such, this NRC approved change to NUREG-1433 is included in the ITS Conversion LAR.

Content of Hope Creek Improved Technical Specifications Submittal, Volumes 1 through 17

Enclosure 2 of the submittal for the conversion of the Hope Creek CTS to the ITS provides the proposed changes to the CTS, discussion of changes for the proposed CTS changes, the Hope Creek ITS and ITS Bases, as marked up utilizing NUREG-1433, and justification for deviations from the NUREG. Enclosure 2 consists of the following seventeen volumes:

Volume Titles

Volume	Title
1	Application of Selection Criteria to the Hope Creek Technical Specifications
2	Generic Determination of No Significant Hazards Considerations and Environmental Assessment
3	ITS Chapter 1.0, Use and Application
4	ITS Chapter 2.0, Safety Limits (SLs)
5	ITS Section 3.0, Limiting Condition for Operation (LCO) Applicability and Surveillance Requirement (SR) Applicability
6	ITS Section 3.1, Reactivity Control Systems
7	ITS Section 3.2, Power Distribution Limits
8	ITS Section 3.3, Instrumentation
9	ITS Section 3.4, Reactor Coolant System (RCS)
10	ITS Section 3.5, Emergency Core Cooling Systems (ECCS), RPV Water Inventory Control, and Reactor Core Isolation Cooling (RCIC) System
11	ITS Section 3.6, Containment Systems
12	ITS Section 3.7, Plant Systems
13	ITS Section 3.8, Electrical Power Systems
14	ITS Section 3.9, Refueling Operations
15	ITS Section 3.10, Special Operations

Volume	Title
16	ITS Chapter 4.0, Design Features
17	ITS Chapter 5.0, Administrative Controls

Volume 1 is provided to assist the NRC in the review and approval of Volumes 2 through 17. The following provides a brief description of the content of each of the volumes in this submittal:

Volume 1

Volume 1 provides details concerning the application of the selection criteria to the individual Hope Creek CTS. Each CTS Specification is evaluated, and a determination is made as to whether the CTS Specification meets the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the proposed ITS.

Volume 2

Volume 2 contains generic evaluations required by 10 CFR 50.91(a), which support a finding of No Significant Hazards Consideration (NSHC). Based on the inherent similarities in the NSHC evaluations, generic evaluations for a finding of NSHC have been provided for the following categories of CTS changes:

- Administrative Changes
- More Restrictive Changes
- Relocated Specifications
- Removed Detail Changes
- Less Restrictive Changes
 - Less Restrictive Changes - Category 1 - Relaxation of LCO Requirements
 - Less Restrictive Changes - Category 2 - Relaxation of Applicability
 - Less Restrictive Changes - Category 3 - Relaxation of Completion Time
 - Less Restrictive Changes - Category 4 - Relaxation of Required Action
 - Less Restrictive Changes - Category 5 - Deletion of Surveillance Requirement
 - Less Restrictive Changes - Category 6 - Relaxation of Surveillance Requirement Acceptance Criteria
 - Less Restrictive Changes - Category 7 - Relaxation of Surveillance Frequency
 - Less Restrictive Changes - Category 8 - Deletion of Reporting Requirements

For less restrictive changes not covered by a generic Less Restrictive Change category, specific NSHC evaluations have been provided in the applicable Chapter,

Section, or Specification in Volumes 3 through 16. Additionally, specific NSHC evaluations have been provided for changes that have been identified beyond the CTS and the ISTS consistent with the guidance of TSTF-GG-13-01.

In addition, Volume 2 contains an evaluation of environmental consideration in accordance with 10 CFR 51.21. It has been determined that the proposed license amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(b), and no environmental impact statement or environmental assessment need be prepared in connection with the proposed license amendment.

Volumes 3 through 17

Volumes 3 through 17 provide the details and justification to support the proposed changes. Each volume corresponds to a Chapter, Section, or Specification of NUREG-1433. Volumes 3, 4, and 16 are arranged by ITS Chapter. Volumes 5 and 17 are arranged by ITS Section. Volumes 6 through 15 are arranged by ITS Specification. Each volume contains the required information to review the conversion to ITS, and include the following:

- Individual Chapter, Section, or Specification, as applicable, in ITS order.
- Relocated/Deleted CTS Specifications (if applicable); and
- ISTS Specifications not adopted in the Hope Creek ITS (if applicable).

The information for each Chapter, Section, and Specification, as applicable, is organized as follows:

CTS Markup and Discussion of Changes (DOCs)

This section contains a markup of the CTS pages, either for CTS pages associated with an Individual ITS Specification or for Relocated/Deleted CTS Specifications, and the DOCs from the CTS. Other CTS license amendment requests under NRC review, as described in Enclosure 4 of this submittal, are not linked to this license amendment request and have not been incorporated in the proposed change.

The CTS markup pages for each ITS Specification are normally in numerical order. However, more than one CTS Specification is sometimes used in the generation of an ITS Specification. In this case, the CTS pages that are the major contributor to the ITS Specification are shown first, followed by the remaining associated CTS pages in numerical order.

The left-hand margin of the CTS markup pages includes a cross-reference to the equivalent ITS requirement. The upper right-hand corner of the CTS markup pages is annotated with the ITS Specification number to which it applies. Items on the CTS markup pages that are addressed in other proposed ITS Chapters, Sections, or Specifications are annotated with the appropriate reference.

The CTS markup pages are annotated with an alphanumeric designator to identify the differences between the CTS and the proposed ITS. The designator corresponds to a DOC, which provides the description and justification of the change to the CTS. The

DOCs are located directly following the associated CTS markup for each Chapter, Section, or Specification, as applicable.

Each proposed change to the CTS is designated as one of the following DOC categories:

Designator Category

- A ADMINISTRATIVE CHANGES – Changes to the CTS that do not result in new requirements or change operational restrictions or flexibility. These changes are supported in aggregate by a single generic NSHC.
- M MORE RESTRICTIVE CHANGES - Changes to the CTS that result in added restrictions or reduced flexibility. These changes are supported in aggregate by a single generic NSHC.
- R RELOCATED SPECIFICATIONS - Changes to the CTS that relocate specifications that do not meet the selection criteria of 10 CFR 50.36(c)(2)(ii). These changes are supported in aggregate by a single generic NSHC.
- LA REMOVED DETAIL CHANGES - Changes to the CTS that eliminate detail and relocate the detail to a licensee controlled document. Typically, this involves details of system design and function, or procedural detail on methods of conducting a Surveillance Requirement. These changes are supported in aggregate by a single generic NSHC. In addition, the generic type of removed detail change is identified in italics at the beginning of the DOC.
 - Type 1 – Removing Details of System Design and System Description, Including Design Limits
 - Type 2 – Removing Descriptions of System Operation
 - Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements
 - Type 4 – Removal of LCO, SR, or other TS Requirement to the TRM, UFSAR, ODCM, QAP, CLRT Program, IST Program, ISI Program, or Surveillance Frequency Control Program
 - Type 5 – Removal of SR Frequency to the Surveillance Frequency Control Program
- L LESS RESTRICTIVE CHANGES - Changes to the CTS that result in reduced restrictions or added flexibility. These changes are supported either in aggregate by a generic NSHC that addresses a particular category of less restrictive change, or by a specific NSHC if the change is not covered by one of the generic categories of less restrictive changes. If the less restrictive change is covered by a generic NSHC, the category of the change is identified in italics at the beginning of the DOC.

The DOCs are numbered sequentially within each letter designator for each ITS Chapter, Section, or Specification.

CTS Bases

The CTS Bases pages are replaced in their entirety by the proposed Hope Creek ITS Bases. Therefore, the CTS Bases markup pages are not provided in the ITS submittal.

Type and Category Descriptions

Type Descriptions

The following is a summary description of each LA-DOC type. Changes to the Hope Creek CTS involving the removal of specific detailed information from individual specifications evaluated to be Types 1 through 5 are as described below:

Type 1 – Removing Details of System Design and System Description, Including Design Limits

The design of the facility is required to be described in the UFSAR by 10 CFR 50.34. In addition, the quality assurance requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings and maintained in accordance with an NRC-approved Quality Assurance Topical Report (QATR). The regulation of 10 CFR 50.59 specifies controls for changing the facility as described in the UFSAR. The regulation of 10 CFR 50.54(a) specifies criteria for changing the QATR. The Technical Requirements Manual (TRM) is a licensee-controlled document, which is also subject to 10 CFR 50.59. Additionally, the ITS Bases contain descriptions of system design. ITS 5.5.8, "Technical Specification (TS) Bases Control Program," specifies controls for changing the Bases. Removing details of system design is acceptable because the associated CTS requirements being retained without these details within the Technical Specifications (TSs) are adequate to ensure safe operation of the facility.

Type 2 – Removing Descriptions of System Operation

The plans for normal and emergency operation of the facility are required to be described in the UFSAR by 10 CFR 50.34. ITS 5.4.1.a and 5.4.1.d requires written procedures to be established, implemented, and maintained for plant operating procedures required by the QATR and for all programs specified in ITS 5.5, "Programs and Manuals," respectively. The ITS Bases also contain descriptions of system operation. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the UFSAR and TRM. The TS Bases Control Program of ITS 5.5.8 specifies controls for changing the Bases. Removing details of system operation is acceptable because the associated CTS requirements being retained without these details within the TSs are adequate to ensure safe operation of the facility. In addition, retaining such details in ITS is unnecessary to ensure proper control of changes.

Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements

Details for performing TS SRs or for regulatory reporting are more appropriately specified in the plant procedures. Changes to procedural details include those associated with limits retained in the ITS. For example, ITS 5.4.1 requires written procedures covering activities that include all programs specified in Specification 5.5 to be established, implemented, and maintained.

Prescriptive procedural information in a TS requirement is unlikely to contain all procedural considerations necessary for the plant operators to comply with TS and all regulatory reporting requirements, and referral to plant procedures is, therefore, required in any event. Therefore, it is acceptable to relocate these type of details from the CTS to licensee-controlled documents.

Type 4 – Removal of LCO, SR, or other TS Requirement to the TRM, UFSAR, ODCM, QAP, CLRT Program, IST Program, ISI Program, or Surveillance Frequency Control Program

Certain CTS administrative requirements are redundant with respect to current regulations and thus are relocated to the UFSAR or other appropriate licensee-controlled documents. The Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors (Federal Register 58 FR 39132) allows licensees to relocate any CTS requirement that does not meet any of the criteria for mandatory inclusion in the TS to licensee-controlled documents.

Examples of the proposed changes include moving details out of the CTS and into the TS Bases, the UFSAR, the Containment Leakage Rate Testing (CLRT) Program, the TRM, and other documents under regulatory control such as the Offsite Dose Calculation Manual (ODCM), the Quality Assurance Program (QAP), the Inservice Testing (IST) Program, the Inservice Inspection (ISI) Program, and the SFCP. The removal of this information is considered to be less restrictive administratively, because it is no longer controlled by the TS change process. Typically, the information moved is descriptive in nature and its removal conforms to NUREG-1433. Changes made in accordance with the provisions of licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QAP, while ITS 5.5.8 governs changes to the ITS Bases. Therefore, it is acceptable to relocate these type of requirements from the CTS to licensee-controlled documents.

To the extent that information has been relocated to licensee-controlled documents, such information is not required to prevent the possibility of an abnormal situation or event giving rise to an immediate threat to public health and safety. Further, where such information is contained in LCOs and associated requirements in the TS, the information does not fall within any of the four criteria set forth in 10 CFR 50.36(c)(2)(ii) as discussed in the Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors. Accordingly, existing detailed information, such as described above, may be removed from the CTS and not included in the ITS.

Type 5 – Removal of SR Frequency to the Surveillance Frequency Control Program

Licensees have the option to retain SR Frequencies within the TSs or adopt TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b." TSTF-425 is a Traveler that is incorporated in NUREG-1433, Revision 5, that requires a formal technical review. Hope Creek has previously adopted TSTF-425 and has relocated periodic frequencies of TS SRs to the licensee-controlled SFCP. ITS 5.5.13, "Surveillance Frequency Control Program," describes the requirements for the program to control changes to the relocated Surveillance Frequencies. Surveillance test requirements remain in the TSs. The SFCP ensures that SRs specified in the TS are performed at intervals sufficient to assure the associated LCOs are met. These changes are designated as a less restrictive removal of detail change because Surveillance Frequencies are being removed from the TSs.

Category Descriptions

The following is a summary description of each L-DOC category:

Less restrictive changes include deletions of and relaxations to portions of the Hope Creek CTS requirements that are being retained in the Hope Creek ITS. When requirements have been shown to give little or no safety benefit, the relaxation or removal of such requirements from the CTS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new NRC staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups' comments on ISTS. Generic relaxations contained in NUREG-1433, Revision 5.0 (ISTS), are generally acceptable because the relaxations are consistent with current licensing practices and the Commission's regulations.

Category 1 – Relaxation of LCO Requirements

Certain CTS LCOs specify limits on operational and system parameters beyond those necessary to ensure meeting safety analysis assumptions and, therefore, are considered overly restrictive. The CTS also contain operating limits that have been shown to give little or no safety benefit to the operation of the plant. The ITS, consistent with the guidance in the ISTS, would delete or revise such operating limits.

These changes reflect the ISTS approach to provide LCO requirements that specify the protective conditions required to meet safety analysis assumptions for required features. These conditions replace the lists of specific devices used in the CTS to describe the requirements needed to meet the safety analysis assumptions.

TS changes represented by this category allow operators to more clearly focus on issues important to safety. The resultant ITS LCOs maintain an adequate degree of protection consistent with the safety analysis. These changes also improve focus on issues important to safety and provide reasonable operational flexibility without adversely affecting the safe operation of the plant. Changes involving the relaxation

of LCOs are consistent with the guidance established by the ISTS taking into consideration the Hope Creek current licensing basis (CLB).

Category 2 – Relaxation of Applicability

The CTS require compliance with an LCO during the applicable Mode(s) or other conditions specified in a Specification's Applicability statement. CTS Applicability tends to be more generalized for reactor conditions. ITS takes into consideration the ISTS which adds a level of detail to the applicable conditions that are consistent with the application of the plant safety analyses assumptions for operability of the required features.

Further, where CTS Applicability requirements are inconsistent with the applicable accident analyses assumptions for a system, subsystem, or component specified in the LCO, changes are proposed to the LCO to establish a consistent set of requirements in the ITS. These modifications or deletions are acceptable because, during the operational or other conditions specified in the ITS Applicability requirements, the LCOs are consistent with the applicable safety analyses. Changes involving relaxation of applicability requirements are consistent with the guidance established by the ISTS, taking into consideration the Hope Creek CLB.

Category 3 – Relaxation of Completion Time

Upon discovery of a failure to meet an LCO, the TSs specify time limits for completing Required Actions of the associated TS Conditions. Required Actions establish remedial measures that must be taken within specified Completion Times. Completion Times specify limits on the duration of plant operation in a degraded condition. Incorporating longer Completion Times is acceptable because such Completion Times continue to be based on the operability status of redundant TS required features, the capacity and capability of remaining TS required features, provision of a reasonable time for repairs or replacement of required features, vendor developed standard repair times, and the low probability of a design basis accident (DBA) occurring during the repair period. Changes involving relaxation of Completion Times are consistent with the guidance established by the Commission, taking into consideration the Hope Creek CLB. These changes are generally made to conform to NUREG-1433 and have been evaluated to not be detrimental to plant safety.

Category 4 – Relaxation of Required Action

LCOs specify the lowest functional capability or performance level of equipment that is deemed adequate to ensure safe operation of the facility. When an LCO is not met, the TSs specify actions to restore the equipment to its required capability or performance level, or to implement remedial measures providing an equivalent level of protection. These actions minimize the risk associated with continued operation while providing time to repair inoperable features. Some of the Required Actions are modified to place the plant in a MODE in which the LCO does not apply. Adopting Required Actions from NUREG-1433 is acceptable because the Required Actions take into account the operability status of redundant systems of required features,

the capacity and capability of the remaining features, and the compensatory attributes of the Required Actions as compared to the LCO requirements.

Compared to CTS required actions, certain proposed ITS actions would result in extending the period during which the licensee may continue to operate the plant with specified equipment inoperable. Upon expiration of this period, further action, which may include shutting down the plant, is required. These ITS actions provide measures that adequately compensate for the inoperable equipment and are commensurate with the safety importance of the inoperable equipment, plant design, and industry practice. Therefore, these action requirements will continue to ensure safe operation of the plant. Changes involving relaxations of action requirements are consistent with the guidance established by the ISTS, taking into consideration the Hope Creek CLB.

Category 5 – Deletion of Surveillance Requirement

The CTS requires maintaining LCO specified structures, systems, and components (SSCs) operable by meeting SRs in accordance with specified SR frequencies. This includes conducting tests to demonstrate that such SSCs are operable and that LCO-specified parameters are within specified limits. When the test acceptance criteria and any specified conditions for the conduct of the test are met, the equipment is deemed operable. The changes of this category relate to deletion of CTS SRs, deletion of acceptance criteria, and deletion of the conditions required for performing the SR.

The ITS eliminates unnecessary CTS SRs that do not contribute to verification that equipment can perform its required functions to meet an LCO. Deleting the SRs, including acceptance criteria and/or conditions for performing the SRs, for these items is consistent with the objective of the ISTS, without reducing confidence that the equipment is operable. Appropriate equipment continues to be tested in a manner and at a frequency necessary to give confidence that the equipment can perform its safety functions. For example, the CTS contain SRs that are not included in the ISTS for a variety of reasons. These SRs include measuring values and parameters that are not necessary to meet ISTS LCO requirements. In addition, the ISTS may not include reference to specific acceptance criteria contained in the CTS, because these acceptance criteria are not necessary to meet ISTS LCO requirements or are defined in other licensee-controlled documents.

The deletion of SRs is acceptable because appropriate testing standards are retained for determining that the LCO required features are operable as defined by the ISTS.

Category 6 – Relaxation of Surveillance Requirement Acceptance Criteria

Prior to placing the plant in a specified operational Mode or other condition stated in the Applicability of an LCO, and in accordance with the specified SR time interval thereafter, the CTS requires establishing the operability of each LCO required component by meeting the SRs associated with the LCO. This usually entails performance of tests to demonstrate the operability of the LCO required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance

criteria, as well as any specified conditions, for the conduct of the test. Relaxations of CTS SRs can include relaxing both the acceptance criteria and the conditions of performance.

For example, the ITS allows some SRs to verify operability under actual or test conditions. Adopting the ITS allowance for these conditions is acceptable because required features cannot distinguish between an "actual" signal or a "test" signal. Also included are changes to CTS SRs that are replaced in the ITS with separate and distinct testing requirements that, when combined, provide operability verification of all components required in the LCO for the features specified in the CTS. Changes that provide exceptions to SRs to allow for variations that do not affect the results of the test are also included in this category.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. The CTS SR relaxations are consistent with the guidance established by the ISTS in consideration of the Hope Creek CLB.

Category 7 – Relaxation of Surveillance Frequency

Prior to placing the plant in a specified operational Mode or other condition stated in the applicability of an LCO, and in accordance with the specified SR time interval (frequency) thereafter, the CTS requires establishing the operability of each LCO required component by meeting the SRs associated with the LCO. This usually entails performance of tests to demonstrate the operability of the LCO required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria, as well as any specified conditions, for the conduct of the test, at a specified frequency based on the reliability and availability of the LCO required components.

Category 7 relaxations of CTS SRs include extending the interval between the SRs. Increasing the time interval between Surveillance tests in the ITS results in decreased equipment unavailability due to testing. Relaxation of Surveillance Frequency can also include the addition of Surveillance Notes that allow testing to be delayed until appropriate unit conditions for the test are established, or exempt testing in certain Modes or specified conditions in which the testing cannot be performed.

Reduced testing is also acceptable where operating experience or other deterministic criteria have demonstrated that these components usually pass the Surveillance when performed at the specified interval, thus the Surveillance Frequency is acceptable from a reliability standpoint. Surveillance Frequency changes to incorporate alternate train testing have also been shown to be acceptable where other qualitative or quantitative test requirements are required that are established predictors of system performance.

These CTS SR frequency relaxations are consistent with the guidance established by the ISTS taking into consideration the Hope Creek CLB.

New Surveillance Frequencies have been evaluated to ensure that an acceptable level of equipment reliability is provided. The performance of the Surveillances will

continue to be limited to conditions where an assessment has determined that plant safety will either be maintained or enhanced.

Category 8 – Deletion of Reporting Requirements

CTS includes requirements to submit reports to the NRC under certain circumstances. However, the ITS eliminates these requirements for many such reports and, in most cases, relies on the reporting requirements of 10 CFR 50.73 or other regulatory requirements. Deletion of reporting requirements is acceptable because applicable regulations provide adequate reporting requirements, or the reports do not affect continued plant operation. Additionally, deletion of these reporting requirements reduces the administrative burden on the plant and allows efforts to be concentrated on restoring Technical Specification required systems and limits.

Therefore, these reporting requirement relaxations have no effect on plant safety and are consistent with the guidance established by the ISTS taking into consideration the Hope Creek CLB.

ISTS Markup and Justification for Deviations (JFDs)

This section contains a markup of the NUREG-1433, Volume 1, ISTS pages, either for ISTS pages associated with an Individual ITS Specification or ISTS Specifications not adopted in the Hope Creek ITS, and JFDs from the ISTS. The ISTS pages are annotated with a numeric designator to identify the differences between the ISTS and the proposed ITS. The designator corresponds to a JFD, which provides the justification for the difference. The JFDs are located directly following the associated ISTS markup for each Chapter, Section, or Specification, as applicable.

The left-hand margin of the ISTS markup pages includes a cross-reference to the equivalent CTS requirement.

ISTS Bases Markup and JFDs

This section contains a markup of the NUREG-1433, Volume 2, ISTS Bases pages, either for ISTS Bases pages associated with an individual ITS Specification or ISTS Specifications not adopted in the Hope Creek ITS, and JFDs from the ISTS Bases. The ISTS Bases pages are annotated with a numeric designator to identify the differences between the ISTS Bases and the proposed ITS Bases. The designator corresponds to a JFD, which provides the justification for the difference. The Bases JFDs are located directly following the associated ISTS Bases markup for each Chapter, Section, or Specification, as applicable. The volumes for ITS Chapters 1.0, 4.0, and 5.0 do not include this section, because NUREG-1433 does not include any Bases for these Chapters.

Specific No Significant Hazards Consideration (NSHC) Determinations

This section contains the determination in accordance with 10 CFR 50.91(a)(1) using the criteria of 10 CFR 50.92(c) to support a finding of NSHC. For changes covered by a generic NSHC, the generic NSHCs are contained in Volume 2 of Enclosure 2. For

less restrictive changes not covered by a generic less restrictive category or have been determined to be a change beyond the CTS and the ITS, a specific NSHC evaluation has been performed. Each evaluation is annotated to correspond to the DOC discussed in the specific NSHC evaluation. For ITS Chapters, Sections, or Specifications for which the changes are covered by a generic NSHC evaluation, a statement that there are no specific NSHCs is provided.

Table 1 – Notable TSTF Travelers and Adoption Status at Hope Creek
(Page 1 of 7)

Traveler No.	Traveler Rev.	Traveler Title	HCGS License Amendment No.	HCGS License Amendment Date	Proposed in ITS Conversion LAR	Plant Specific Deviations	Comments
2	1	Relocate the 10 year sediment cleaning of the fuel oil storage tank to licensee control			Yes	No	TSTF-2 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5.
258	4	Changes to Section 5.0, Administrative Controls			Yes	Yes	TSTF-258 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5, except as shown in Justification for Deviations.
332	1	ECCS Response Time Testing	85	10/24/1995		Yes	Not based on TSTF.
358	5	Missed Surveillance Requirements	145	03/31/2003		No	
359	9	Increase Flexibility in MODE Restraints	180	12/8/2009		No	
369	1	Removal of Monthly Operating Report and Occupational Radiation Exposure Report	161	1/11/2006		No	

Table 1 – Notable TSTF Travelers and Adoption Status at Hope Creek (continued)
(Page 2 of 7)

Traveler No.	Traveler Rev.	Traveler Title	HCGS License Amendment No.	HCGS License Amendment Date	Proposed in ITS Conversion LAR	Plant Specific Deviations	Comments
423	1	Technical Specifications End States, NEDC-32988-A			Yes	Yes	TSTF-423 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5, except as shown in Justification for Deviations.
425	3	Relocate Surveillance Frequencies to Licensee Control - RITSTF Initiative 5b	187	2/25/2011		Yes	ITS proposes plant specific deviations as shown in the Justification for Deviations.
427	2	Allowance for Non Technical Specification Barrier Degradation on Supported System OPERABILITY	228	4/26/2021		No	
454	1	Extend PCIV Completion Times (NEDC-33046)			No	N/A	This risk based initiative is not adopted in anticipation of future adoption of TSTF-505.
460	0	Control Rod Scram Time Testing Frequency	183	9/27/2010		No	Frequency moved to SFCP consistent with the TSTF-425.

Table 1 – Notable TSTF Travelers and Adoption Status at Hope Creek (continued)
(Page 3 of 7)

Traveler No.	Traveler Rev.	Traveler Title	HCGS License Amendment No.	HCGS License Amendment Date	Proposed in ITS Conversion LAR	Plant Specific Deviations	Comments
493	4	Clarify Application of Setpoint Methodology for LSSS Functions			Yes	Yes	TSTF-493, Option A is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5, except as shown in Justification for Deviations. An instrumentation Setpoint Summary Report (Attachment 2 to the LAR) is provided to assist the NRC review.
500	2	DC Electrical Rewrite - Update to TSTF-360			Yes	Yes	TSTF-500 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5, except as shown in Justification for Deviations.
514	3	Revise BWR Operability Requirements and Actions for RCS Leakage Instrumentation			Yes	Yes	TSTF-514 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5, except as shown in Justification for Deviations.

Table 1 – Notable TSTF Travelers and Adoption Status at Hope Creek (continued)
(Page 4 of 7)

Traveler No.	Traveler Rev.	Traveler Title	HCGS License Amendment No.	HCGS License Amendment Date	Proposed in ITS Conversion LAR	Plant Specific Deviations	Comments
522	1	Revise Ventilation System Surveillance Requirements to Operate for 10 hours per Month	199	11/30/2015		No	
523		Generic Letter 2008-01, Managing Gas Accumulation			No	N/A	TSTF-523 is not applicable to HCGS. Refer to PSEG response letters to GL 2008-01. (See ADAMS Accession Nos ML081130672, ML082970219, ML092230347, & ML110400201)
529	2	Clarify Use and Application Rules	214	3/6/2019		No	
535	1	Revise Shutdown Margin Definition to Address Advanced Fuel Designs	208	12/13/2017		No	
541	2	Add Exceptions to Surveillance Requirements for Valves and Dampers Locked in the Actuated Position			Yes	No	TSTF-541 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5.

Table 1 – Notable TSTF Travelers and Adoption Status at Hope Creek (continued)
(Page 5 of 7)

Traveler No.	Traveler Rev.	Traveler Title	HCGS License Amendment No.	HCGS License Amendment Date	Proposed in ITS Conversion LAR	Plant Specific Deviations	Comments
542	2	Reactor Pressure Vessel Water Inventory Control	213	10/30/2018		No	
545	3	TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing	205	6/28/2017		No	
546	0	Revise APRM Channel Adjustment Surveillance Requirement	220	11/7/2019		No	
551	3	Revise Secondary Containment Surveillance	218	9/6/2019		Yes	TSTF-551 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5, except as shown in Justification for Deviations.
554	1	Revise Reactor Coolant Leakage Requirements			Yes	No	TSTF-554 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5.
557	1	Spent Fuel Storage Rack Neutron Absorber Monitoring Program			No	N/A	This is a bracketed item in NUREG-1433, Rev. 5 and HCGS Technical Specifications does not require this Program.

Table 1 – Notable TSTF Travelers and Adoption Status at Hope Creek (continued)
(Page 6 of 7)

Traveler No.	Traveler Rev.	Traveler Title	HCGS License Amendment No.	HCGS License Amendment Date	Proposed in ITS Conversion LAR	Plant Specific Deviations	Comments
563	0	Revise Instrument Testing Definitions to Incorporate the Surveillance Frequency Control Program	223	3/24/2020		No	
564	2	Safety Limit MCPR	219	9/19/2019		No	
565	1	Revise the LCO 3.0.2 and LCO 3.0.3 Bases	Bases change	12/10/2019		No	
566	0	Revise Actions for Inoperable RHR Shutdown Cooling Subsystems			Yes	No	TSTF-566 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5.
568	2	Revise Applicability of BWR/4 TS 3.6.2.5 and TS 3.6.3.2			Yes	Yes	TSTF-568 is partially applicable to HCGS. HCGS Technical Specifications do not include ISTS 3.6.2.5 requirements. Propose adoption as specified in NUREG-1433, Rev. 5, except as shown in Justification for Deviations.

Table 1 – Notable TSTF Travelers and Adoption Status at Hope Creek (continued)
(Page 7 of 7)

Traveler No.	Traveler Rev.	Traveler Title	HCGS License Amendment No.	HCGS License Amendment Date	Proposed in ITS Conversion LAR	Plant Specific Deviations	Comments
580	1	Provide Exception from Entering Mode 4 With No Operable RHR Shutdown Cooling			Yes	No	TSTF-580 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5.
582	0	RPV WIC Enhancements	227	3/12/2021		No	
584	0	Eliminate Automatic RWCU System Isolation on SLC Initiation			Yes	No	TSTF-584 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5.
587-T	0	Delete LCO 3.5.2 Note			Yes	No	TSTF-587-T is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5.
592	2	Revise Automatic Depressurization System (ADS) Instrumentation Requirements			Yes	No	TSTF-592 is applicable to HCGS. Propose adoption as specified in NUREG-1433, Rev. 5.

ENCLOSURE 3

**HOPE CREEK GENERATING STATION
IMPROVED TECHNICAL SPECIFICATIONS SUBMITTAL
LICENSEE IDENTIFIED CHANGES THAT MAY REQUIRE
TECHNICAL BRANCH REVIEW**

(2 TOTAL PAGES, INCLUDING COVER SHEETS)

Changes included in the Improved Technical Specifications (ITS) conversion submittal that are not consistent with the Current Technical Specifications (CTS) and are not the result of adopting the Improved Standard Technical Specifications (ISTS) as described in NUREG-1433, Rev. 5.0. The following is a list of changes identified in Enclosure 2 that meet this criterion in the HCGS ITS conversion submittal, but do not involve a design change to the plant:

1. The periodic frequency of selected Surveillances in ITS Section 5.5 are proposed to be relocated to the Surveillance Frequency Control Program (SFCP). This deviation from ISTS Rev. 5 and Technical Specification Task Force (TSTF) Traveler TSTF-425 has been previously approved for at least three (3) plants. Hope Creek currently has an approved SFCP. (Refer to Enclosure 2, Volume 17, ITS 5.5, DOC LA01)

ENCLOSURE 4

**HOPE CREEK GENERATING STATION
IMPROVED TECHNICAL SPECIFICATIONS SUBMITTAL
DISPOSITION OF EXISTING LICENSE AMENDMENT REQUESTS
(2 TOTAL PAGES, INCLUDING COVER SHEETS)**

The following license amendment request is under NRC review. The following table describes the request, and its effect on the Improved Technical Specification conversion, and its disposition.

DISPOSITION OF EXISTING LICENSE AMENDMENT REQUESTS				
Submittal Date	Description of Change	Affected ITS Submittal Specifications	Affected CTS Pages	Disposition
September 6, 2023	License Amendment Request (LAR) to Modify the Salem and Hope Creek Exclusion Area Boundary	None	None	There is no impact.
May 2024	LAR to Revise Hope Creek Generating Station Technical Specification to Change Surveillance Intervals to Accommodate a 24-Month Fuel Cycle	None	Facility Operating License New Condition C.(29), Page 15	Proposed license condition to avoid overlap with ITS 5.5.13 Surveillance Frequency Control Program (SFCP)
		None	Table 1.1, Page 1-10	Table not included in the ITS
		SR 3.6.1.3.11	4.6.1.2.f, Page 6-4	ITS relocates Frequency to the Primary Containment Leakage Rate Program
		SR 3.6.1.3.13	4.6.1.2.g, Page 6-4	ITS relocates Frequency to the Primary Containment Leakage Rate Program
		SR 3.6.1.3.12	4.6.1.2.h, Page 6-4	ITS relocates Frequency to the Primary Containment Leakage Rate Program
		5.5.12	6.16d, Page 6-27	ITS relocates Frequency to the SFCP.

ENCLOSURE 5

**HOPE CREEK GENERATING STATION
IMPROVED TECHNICAL SPECIFICATIONS SUBMITTAL**

REGULATORY COMMITMENTS

(2 TOTAL PAGES, INCLUDING COVER SHEETS)

No.	Commitments for TSTF-500	Due Date / Event
1	<p>Revise or develop plant procedures, as applicable, to address the following:</p> <ul style="list-style-type: none"> • minimum required procedural time to measure battery float current is at least 30 seconds or as recommended by the float current measurement instrument manufacturer. This minimum float current measurement time is required to provide a more accurate battery float current reading. • routinely monitor battery room temperature such that a room temperature excursion could reasonably expect to be detected and corrected prior to the average battery electrolyte temperature dropping below the minimum electrolyte temperature. • verification of the selection of the pilot cell or cells when performing the Surveillance that verifies the float voltage of each connected battery cell. • ensure that the modified performance discharge test completely encompasses the load profile of the battery service test and that it adequately confirms the intent of the service test to verify the battery capacity to supply the design basis load profile. 	Upon Implementation
2	<p>Relocate the following requirements to the Battery Monitoring and Maintenance Program and implementing procedures:</p> <ul style="list-style-type: none"> • Battery cell resistance limits in existing Surveillance • Monitoring of battery parameters (i.e., specific gravity, electrolyte level, cell temperature, float voltage, connection resistance, and physical condition) 	Upon Implementation
	Commitments for TSTF-423	
3	<p>PSEG Nuclear will follow the guidance established in TSTF-IG-05-02, "Implementation Guidance for TSTF-423, Rev. 1, 'Technical Specifications End States, NEDC-32988-A,'" upon implementation of the end state requirements.</p>	Upon Implementation

ENCLOSURE 6

**HOPE CREEK GENERATING STATION
IMPROVED TECHNICAL SPECIFICATIONS SUBMITTAL**

**LIST OF REQUIRED UPDATED FINAL SAFETY ANALYSIS REPORT
DESCRIPTIONS FOR TSTF-500**

(2 TOTAL PAGES, INCLUDING COVER SHEETS)

The following table identifies Updated Final Safety Analysis Report (UFSAR) descriptions for the Class 1E 125 VDC and 250 VDC batteries required by Hope Creek Generating Station (HCGS) as part of the adoption of TSTF-500, DC Electrical Rewrite – Update to TSTF-360, Revision 2 in the HCGS Improved Technical Specifications. These changes will be included with the required implementation date upon the issuance of Improved Technical Specifications license amendment.

REQUIRED UFSAR DESCRIPTION	DUE DATE /EVENT
<p>HCGS will change or verify that the UFSAR:</p> <ol style="list-style-type: none">1. Describes how a 5 percent design margin for the batteries corresponds to a 2 amp float current value indicating that the battery is 95 percent charged.2. States that long term battery performance is supported by maintaining a float voltage greater than or equal to the minimum established design limits provided by the battery manufacturer.3. Describes how the batteries are sized with correction margins that include temperature and aging and how these margins are maintained.4. States the minimum established design limit for battery terminal float voltage.5. States the minimum established design limit for electrolyte level.6. States the minimum established design limit for electrolyte temperature.7. Describes how each battery is designed with additional capacity above that required by the design duty cycles to allow for temperature variations and other factors.8. Describes normal DC system operation, i.e., powered from the battery chargers with the batteries floating on the system, and a loss of normal power to the battery charger describing how the DC load is automatically powered from the station batteries.	<p>Upon Implementation (applied to all)</p>

ENCLOSURE 7

**HOPE CREEK GENERATING STATION
IMPROVED TECHNICAL SPECIFICATIONS SUBMITTAL**

**PROPOSED REVISIONS TO HOPE CREEK RENEWED FACILITY
OPERATING LICENSE NPF-57**

(4 TOTAL PAGES, INCLUDING COVER SHEETS)

Prior NRC approval, under 10 CFR 50.90, is required for a change to the categorization process specified above (e.g., change from the alternate seismic approach (referenced above) to a seismic probabilistic risk assessment approach).

(29) Improved Technical Specifications Implementation License Conditions

a. Relocation of Certain Technical Specification Requirements

License Amendment 23X authorizes the relocation of certain Technical Specifications previously included in Appendix A to other licensee controlled documents. Implementation of this amendment shall include relocation of the requirements to the specified documents, as described in Table R, Relocated Specifications and Removed Detail Changes, attached to the NRC staff's Safety Evaluation, which is enclosed in this amendment.

b. Schedule for New and Revised Surveillance Requirements (SRs)

The schedule for performing SRs that are new or revised in License Amendment 23X shall be as follows:

1. For SRs that are new in this amendment, the first performance is due at the end of the first Surveillance interval, which begins on the date of implementation of this amendment.
2. For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced Surveillance interval begins upon completion of the first Surveillance performed after implementation of this amendment.
3. For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended Surveillance interval begins upon completion of the last Surveillance performed prior to implementation of this amendment.
4. For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance subject to the modified acceptance criteria is due at the end of the first Surveillance interval that began on the date the Surveillance was last performed prior to the implementation of this amendment.

- D. The facility requires exemptions from certain requirements of 10 CFR Part 50 and 10 CFR Part 70. An exemption from the criticality alarm requirements of 10 CFR 70.24 was granted in Special Nuclear Material License No. 1953, dated August 21, 1985. This exemption is described in Section 9.1 of Supplement No. 5 to the SER. This previously granted exemption is continued in this renewed operating license. An exemption from certain requirements of Appendix A to 10 CFR Part 50, is described in Supplement No. 5 to the SER. This exemption is a schedular exemption to the requirements of General Design Criterion 64, permitting delaying functionality of the Turbine Building Circulating Water System-Radiation Monitoring System until 5 percent power for local indication, and until 120 days after fuel load for control room indication (Appendix R of SSER 5). Exemptions from certain requirements of Appendix J to 10 CFR Part 50, are described in Supplement No. 5 to the SER. These include an exemption from the requirement of Appendix J, exempting main steam isolation valve leak-rate testing at 1.10 Pa (Section 6.2.6 of SSER 5); an exemption from Appendix J, exempting Type C testing on traversing incore probe system shear valves (Section 6.2.6 of SSER 5); an exemption from Appendix J, exempting Type C testing for instrument lines and lines containing excess flow check valves (Section 6.2.6 of SSER 5); and an exemption from Appendix J, exempting Type C testing of thermal relief valves (Section 6.2.6 of SSER 5). These exemptions are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. These exemptions are hereby granted. The special circumstances regarding each exemption are identified in the referenced section of the safety evaluation report and the supplements thereto. These exemptions are granted pursuant to 10 CFR 50.12. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.
- E. The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, submitted by letter dated May 19, 2006 are entitled: "Salem-Hope Creek Nuclear Generating Station Security Training and Qualification Plan," and "Salem-Hope Creek Nuclear Generating Station Security Contingency Plan." The plans contain Safeguards Information protected under 10 CFR 73.21.

PSEG Nuclear LLC shall fully implement and maintain in effect all provisions of the Commission-approved Cyber Security Plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Salem-Hope Creek CSP was approved by License Amendment No. 189 as supplemented by changes approved by License Amendment Nos. 192, 197 and 204.

- F. DELETED
- G. The licensees shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.
- H. This renewed license is effective as of the date of issuance and shall expire at midnight on April 11, 2046.

FOR THE NUCLEAR REGULATORY COMMISSION

- original signed by E. J. Leeds -

Eric J. Leeds, Director
Office of Nuclear Reactor Regulation

Enclosures:

1. Appendix A - Technical Specifications
(NUREG-1202)
2. Appendix B - Environmental Protection Plan
3. Appendix C - Additional Conditions

Date of Issuance: July 20, 2011

Renewed License No. NPF-57
Amendment No. 22423x