

November 2, 1999

MEMORANDUM TO: File Center

FROM: Richard B. Ennis, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: HOPE CREEK GENERATING STATION, FACSIMILE TRANSMISSION,
ISSUES TO BE DISCUSSED IN AN UPCOMING CONFERENCE CALL
(TAC NO. MA6342)

The attached information was transmitted by facsimile on November 2, 1999, to Mr. Charles Manges of Public Service Electric & Gas Company (PSE&G or the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's submittal dated August 26, 1999, which requested a revision to the Hope Creek Generating Station Technical Specifications to raise the condensate storage tank low level setpoint. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Original signed by R. Ennis

Docket No. 50-354

Attachment: Issues for Discussion in Upcoming Telephone Conference

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**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

WASHINGTON, D.C. 20555-0001

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Attachment: Issues for Discussion in Upcoming Telephone Conference

Issues for Discussion in Upcoming Telephone Conference
Related to PSE&G License Change Request H99-08, dated August 26, 1999
Raise Condensate Storage Tank Low Level Setpoint

The PSE&G submittal dated August 26, 1999, states that raising the Hope Creek Generating Station (HCGS) condensate storage tank (CST) low level setpoint impacted the previously established methods of maintaining the 135,000 gallon reserve volume in the CST for use by the high pressure coolant injection (HPCI) and reactor core isolation cooling (RCIC) systems. The submittal provides the following information:

- a) The new CST low level setpoint at which the HPCI and RCIC pump suctions will transfer to the suppression pool is 67,675 gallons.
- b) A control room low level alarm at 266,000 gallons and operator action are being relied on to maintain a minimum operational CST level above 203,000 gallons. The 203,000 gallons is the minimum CST volume that ensures that 135,000 gallons are reserved for HPCI and RCIC.
- c) A procedure change crediting the CST low level alarm function and subsequent operator actions to maintain the reserve volume was implemented. The procedure requires that operators preemptively transfer HPCI and RCIC suction to the safety related suppression pool supply if the CST level decreases below 203,000 gallons during plant operation with no actuation of RCIC or HPCI.

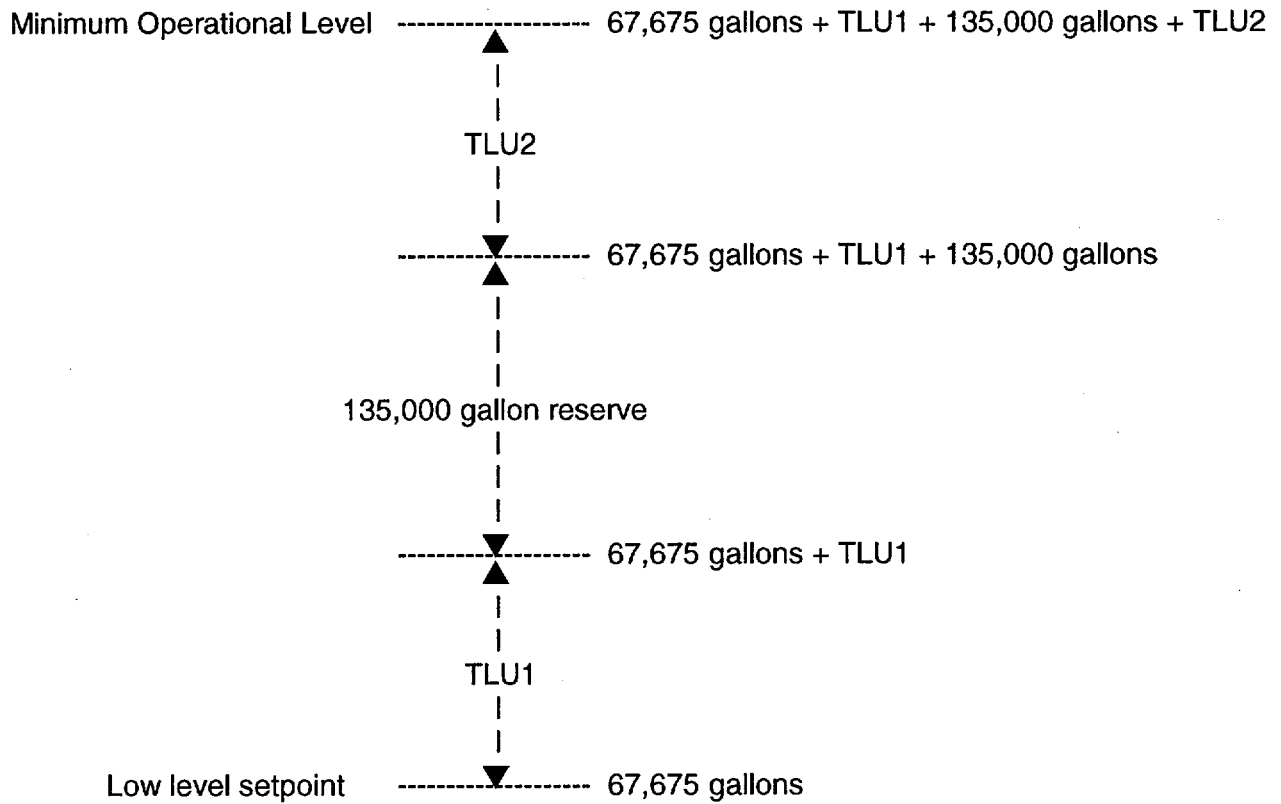
As described in the HCGS Updated Final Safety Analysis Report (UFSAR) section 9.2.6.1, the 135,000 gallon reserve volume for use by HPCI and RCIC is a design basis requirement for the CST. Since the new CST low level setpoint is 67,675 gallons and the reserve volume is 135,000 gallons, the minimum operational CST level must be at least 202,675 gallons (i.e., $67,675 + 135,000$) not including any instrument uncertainties. This leaves a maximum of 325 gallons to account for all instrument uncertainties (i.e., $203,000 - 202,675$).

Given the information described above, it is not clear if sufficient instrument uncertainties were accounted for in establishing the minimum operational CST level (i.e., 203,000 gallons) in order to ensure that the 135,000 gallon design basis value will be maintained.

- 1) What is the total instrument loop uncertainty (in gallons) on the CST low level setpoint of 67,675 gallons?
- 2) What instrumentation is used by the ensure that the minimum operational CST level of 203,000 gallons is maintained?
- 3) What is the total instrument loop uncertainty (in gallons) of the instrumentation used in question (2)?
- 4) What instrument uncertainties (e.g., basic accuracy, setting tolerance, maintenance and test equipment, temperature effects) were included in the total loop uncertainty calculations for the instrumentation in questions (1) and (3)?
- 5) What process effects (if any) were included in the total loop uncertainty calculations in questions (1) and (3)?

Note, Figure 1 depicts how the minimum operational CST level could be determined by taking the appropriate uncertainties into account.

FIGURE 1
Determination of CST Minimum Operational Level



- TLU1 = Total Loop Uncertainty associated with instrumentation used for CST low level setpoint
- TLU2 = Total Loop Uncertainty associated with instrumentation used by operators to ensure that the minimum operational CST level is maintained