



Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038-0236

Nuclear Business Unit

NOV 16 1999

LR-N990477

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

**CHANGE TO COMMITMENTS/REVISION TO LCR
GENERIC LETTER 94-02/LCR H99-01
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354**

Gentlemen:

This letter modifies commitments made by Public Service Electric and Gas Company (PSE&G) in response to Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal Hydraulic Instabilities in Boiling Water Reactors" and revises the associated license change request (LCR H99-01).

In Letter LR-N94140, dated September 9, 1994, PSE&G responded to Generic Letter 94-02 and committed to installing an Oscillation Power Range Monitor (OPRM) to detect and suppress reactor core thermal hydraulic instabilities. As part of this commitment, PSE&G indicated that the objective was to have the OPRM installed prior to startup from the seventh refueling outage and to have it operational following completion of the acceptance testing and expiration of the interim evaluation/familiarization period (at least six months following startup from the outage). PSE&G committed to continue using the interim corrective actions (ICAs) while the trip was disabled. PSE&G also committed to modify the Technical Specifications to reflect installation of the OPRM but indicated that the existing Technical Specifications would be used without modification during the interim period.

In Letter LR-N970385, dated July 1, 1997, PSE&G clarified the "at least six months" commitment. In that letter, PSE&G committed to operate with the OPRM trip function disabled for a full operating cycle and to have the OPRM operational following startup from the eighth refueling outage.

In Letter LR-N980326, dated August 6, 1998, PSE&G informed the NRC that the OPRM had been installed during the seventh refueling outage but changed the commitment for enabling the trip from during the eighth refueling outage to during the ninth refueling outage. The deferral was a result of software changes identified as a result of lessons learned from the installation at the Susquehanna Steam Electric Station.

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The power is in your hands.

PDR ADDUC 0500354 P

In LCR H99-01, dated May 17, 1999, PSE&G submitted Technical Specifications for the OPRM and noted that the trip function would be enabled during the ninth refueling outage. The LCR also requested that the license amendment be made effective immediately upon NRC approval and be implemented prior to exceeding 25% of rated thermal power during return to power from the ninth refueling outage.

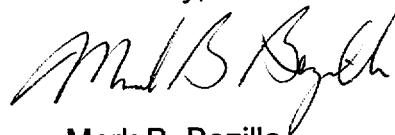
Monitoring/analyzing the performance of the OPRM has been hampered as a result of the following:

- The default flow deviation alarm setpoint of 4% proved to be too small and resulted in almost constant alarms,
- Other alarms were caused by a problem that was determined to be a Part 21 issue,
- A logic problem was discovered while analyzing an OPRM trip following a unique LPRM failure,
- The vendor requested that OPRM modules be returned for repair of three design/manufacturing defects (interrupted monitoring for several months), and
- A time stamp problem in the Maintenance Terminal software has made data analysis more difficult.

The OPRM modules are currently unable to perform their intended function (beyond monitoring) due to the Part 21 issue. Although the vendor has estimated that the Part 21 resolution will be available by December 31, 1999, PSE&G recognizes that this is a target and that delays are possible. PSE&G has determined that the prudent course of action is to defer completion of the OPRM installation until the tenth refueling outage (currently scheduled to begin in October 2001). This deferral will allow a full cycle of monitoring with the corrected software (correcting the Part 21 issue, the LPRM downscale failure logic problem, and the Maintenance Terminal time stamp problem). The deferral will also allow a complete assessment of the Part 21 resolution. PSE&G will keep the established ICAs in place until the trip is enabled and the modified Technical Specifications are implemented. In addition to changing the Generic Letter 94-02 commitment, this letter also revises LCR H99-01. References to the ninth refueling outage in the LCR cover letter should be changed to the tenth refueling outage. PSE&G has concluded that the change from the ninth to the tenth refueling outage does not alter the conclusions reached in the 10CFR50.92 No Significant Hazards analysis previously submitted with LCR H98-01.

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

Sincerely,

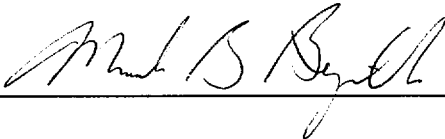


Mark B. Bezilla
Vice President – Operations

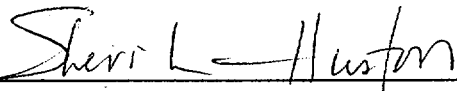
STATE OF NEW JERSEY)
COUNTY OF SALEM) SS.

Mark B. Bezilla being duly sworn according to law deposes and says:

I am Vice President – Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth in the above referenced letter, concerning Hope Creek Generating Station, Unit 1, are true to the best of my knowledge, information and belief.



Subscribed and Sworn to before me
this 16 day of Nov., 1999



Notary Public of New Jersey

My Commission expires on 12/8/2003

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