



10 CFR 50.90

**DEC 19 2017**

LR-N17-0187  
LAR H17-03

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Hope Creek Generating Station  
Renewed Facility Operating License No. NPF-57  
NRC Docket No. 50-354

Subject: **RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING  
LICENSE AMENDMENT REQUEST FOR MEASUREMENT UNCERTAINTY  
RECAPTURE POWER UPRATE (CAC NO. MF9930)**

- References
1. PSEG letter to NRC, "License Amendment Request for Measurement Uncertainty Recapture (MUR) Power Uprate," dated July 7, 2017 (ADAMS Accession No. ML17188A260)
  2. NRC e-mail to PSEG, "Hope Creek MUR - Final Request for Additional Information (ABHP)," dated December 14, 2017 (ADAMS Accession No. ML17348A624)

In the Reference 1 letter, PSEG Nuclear LLC (PSEG) submitted a license amendment request for Hope Creek Generating Station (HCGS). The proposed amendment will increase the rated thermal power (RTP) level from 3840 megawatts thermal (MWt) to 3902 MWt, and make Technical Specification (TS) changes as necessary to support operation at the uprated power level.

In Reference 2, the U.S. Nuclear Regulatory Commission staff provided PSEG a Request for Additional Information (RAI) to support the NRC staff's detailed technical review of Reference 1.

PSEG has determined that the information provided in this submittal does not alter the conclusions reached in the 10 CFR 50.92 no significant hazards determination previously submitted. In addition, the information provided in this submittal does not affect the bases for

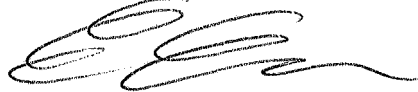
concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

No new regulatory commitments are established by this submittal. If you have any questions or require additional information, please do not hesitate to contact Mr. Brian Thomas at (856) 339-2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 12/19/17  
(Date)

Respectfully,

A handwritten signature in black ink, appearing to read 'Eric Carr', with a stylized, flowing script.

Eric Carr  
Site Vice President  
Hope Creek Generating Station

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Attachment

1. Response to Request for Additional Information Regarding MUR Power Uprate

cc: Mr. D. Dorman, Administrator, Region I, NRC  
Ms. L. Regner, Project Manager, NRC  
NRC Senior Resident Inspector, Hope Creek  
Mr. P. Mulligan, Chief, NJBNE  
Mr. L. Marabella, Corporate Commitment Tracking Coordinator  
Mr. T. MacEwen, Hope Creek Commitment Tracking Coordinator

**Response to Request for Additional Information Regarding MUR Power Uprate**

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
REGARDING LICENSE AMENDMENT REQUEST FOR  
MEASUREMENT UNCERTAINTY RECAPTURE POWER UPRATE

Hope Creek Generating Station  
Docket No. 50-354  
CAC No. MF9930

**APHB-1**

NRC Regulatory Issue Summary 2002-03, "Guidance on the Content of Measurement Uncertainty Recapture Power Uprate Applications," Attachment 1, Section VII.4 requests the licensee for confirmation of its intent to revise existing plant operating procedures related to temporary operation above "full steady-state licensed power levels" to reduce the magnitude of the allowed deviation from the licensed power level. The magnitude should be reduced from the pre-power uprate value of 2 percent to a lower value corresponding to the uncertainty in power level credited by the proposed power uprate application.

In the licensee submittal dated July 7, 2017, the cross-reference for this section refers to Enclosure 1, Section 3.2.6, *Reactor Power Monitoring* which states:

*Plant procedures provide requirements for monitoring and controlling reactor power in compliance with the TS.*

The licensee's statement does not specify whether these procedures will be revised as part of the MUR to reduce the magnitude of the allowed deviation from the licensed power level.

Please summarize the revisions to be made to plant procedures associated with reduction of the magnitude of the allowed deviation from the licensed power level.

**Response:**

The reduction in uncertainty for measurement of licensed thermal power level does not impact how Hope Creek controls operation of the plant at the allowed licensed thermal power limit. Procedures HC.OP-IO.ZZ-0006, *Power Changes During Operation*, and OP-HC-300-2020, *Review of Reactor Core Performance Information*, implement controls for operation at the licensed thermal power level. Hope Creek monitors a 1-hour average of core thermal power and takes action to ensure that the 1-hour average does not exceed the Licensed Power Limit. In addition to monitoring the 1-hour average, Hope Creek also monitors a 5-minute average of core thermal power. If the 5-minute average exceeds a value of 3848 MWt (current licensed power limit plus 8MWt) then prompt action is taken to reduce the 5 minute average below this value. In addition the procedures require that core thermal power level over a completed shift does not exceed the Licensed Power Limit. These controls are consistent with Regulatory Information Summary (RIS) 2007-21, Rev 1, *Adherence to Licensed Power Limits*, and the NEI Position Statement – Guidance to Licensees on Complying with the Licensed Power Limit (ADAMS No. ML081750537). The NEI Position Statement was endorsed by NRC Safety Evaluation issued on October 8, 2008 (ADAMS No. ML082690105). The above procedures will be revised during implementation of the license amendment request to reflect the new licensed thermal power limit.