

Public Service  
Electric and Gas  
Company

Stanley LaBruna

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-4800

Vice President - Nuclear Operations

APR 01 1991

NLR-N91044

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

IN-SERVICE TESTING REQUIREMENTS  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354

On January 29, 1991, Public Service Electric and Gas Company (PSE&G) submitted a commitment to NRC to implement Revision 2 of the In-Service Testing (IST) program as approved in Safety Evaluation Report transmitted on September 27, 1990. The majority of program elements become due on April 1, 1991, with the balance requiring implementation by September 1, 1991. PSE&G is able to fulfill that commitment with exceptions listed below.

1. Generic Pump Relief - I, (Section 3.1.1 of TER and Item 11 of Appendix C), allows interim relief from the requirements of IWP-4110 & 4120 for six months to obtain specific systems' permanently installed instrument ranges and accuracy data for resubmittal and NRC evaluation.

PSE&G requests that this Relief Request be withdrawn, and resubmitted on a case by case basis as scheduled plant modifications are implemented. The modifications include changes to the affected systems' instrumentation and subsequently any evaluation used to support this Relief Request.

To fulfill the requirements of IWP-4110 & 4120, PSE&G will continue to utilize appropriate portable measuring and test equipment (M&TE). This equipment will include the necessary accuracy and ranges specified by the code.

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2. Category B, Category B/C, and Rapid Acting Valves (Sections 4.4.1.1, 4.3.3.1, and 4.1.6.1 of TER and Items 5, 7, and 6 of Appendix C), are allowed a one year relief to develop a suitable method for solenoid valve actuation testing.

The primary method under investigation includes the use of acoustic monitoring. Preliminary results of this testing has not been encouraging. Based on this, it is expected that another method needs to be determined and the one year relief extended. If extension of the one year relief is necessary, a revised Relief Request will be provided at that time.

3. Compliance with relief requests V-03 (TER 4.1.3.1), V-04 (TER 4.1.3.2), and V-07 (TER 4.1.5.1) requires the revision of one Hope Creek ISI procedure, M9-ILP-03H, "Local Leak Rate Testing". Due to back-to-back refueling outages at Hope Creek and Salem Unit 1, this procedure will not be able to be revised until June 1, 1991.

This procedure applies to tests that are performed on an 18 month interval. Since these tests were performed during the recent refueling outage, the procedure will not be utilized again until the next refueling outage, scheduled for mid-1992.

If you have any questions regarding this transmittal, please do not hesitate to contact us.

Sincerely,



C Mr. T. T. Martin, Administrator  
USNRC Region 1

Mr. S. Dembek  
USNRC Licensing Project Manager

Mr. T. P. Johnson  
USNRC Senior Resident Inspector

Mr. K. Tosch, Chief,  
Bureau of Nuclear Engineering  
New Jersey Department of Environmental Protection