



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL
PROTECTION AND ENERGY

CHRISTINE TODD WHITMAN
Governor

ROBERT C. SHINN, JR.
Commissioner

July 13, 1994

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

Gentlemen:

Subject: License Amendment Application
Diesel Generator Surveillance Requirements Changes
Facility Operating License NPF-57
Hope Creek Generating Station
Docket Nos. 50-354
License Change Request 93-23

PSE&G submitted an application for amendment to Appendix A of Hope Creek Facility Operating License NPF-57 in accordance with 10CFR50.90. PSE&G seeks to incorporate NUREG-1433 diesel fuel oil storage operability requirements and revises the five minute diesel hot restart conditions. In addition, the amendment request also revises the surveillance requirements to allow the 24 hour diesel generator endurance test to be conducted during any operational condition.

The New Jersey Department of Environmental Protection's Nuclear Engineering Section (NES) has reviewed the request and the supplemental information in accordance with the requirements of 10 CFR 50.91(b) and has the following comments.

The NES concurs with the revisions to provide a 48 hour period to replenish the diesel fuel oil supply and permit the diesel generator five minute restart test to be conducted not only after the proposed surveillance requirements but also after the diesel generator has operated between 4300 kW and 4400 kW for one hour or anytime the diesel generator operating temperature has stabilized.

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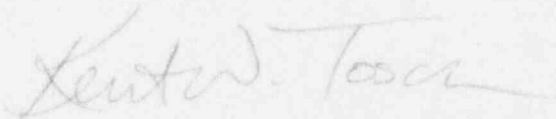
With respect to allowing that the diesel generator 24 hour endurance test be performed during any mode of operation, the NES believes that more information is required before the submittal can be approved. We are not convinced that the unknown risks of testing the diesel generator at power for 24 hours outweigh the benefits outlined by PSE&G. Though most protections are in place and it makes sense to have flexibility in carrying out the endurance test, the monthly NRC approved 1 hour test does not provide enough assurance that the 24 hour test will not induce unwanted electrical perturbations. Is it reasonable to assume that a 1 hour monthly test is as risky as a 24 hour test?

Also, no information was provided on existing plant experience that might offer valuable insights into 24 hour emergency diesel generator testing during power operation. The submittal stated that the Limerick Nuclear Generating Station was approved for 24 hour endurance testing. What has been their experience?

The NES suggests that the NRC better quantify the risk associated with 24 hour emergency diesel generating testing during power operation to estimate the relative impact on plant safety at Hope Creek.

If you have any questions, please contact Dennis J. Zannoni at (609) 987-2037 or Rich Pinney at (609) 987-2086.

Sincerely,



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Bureau of Nuclear Engineering

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