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July 29, 1983

Dr. Thomas E. Murley, Administrator  
U. S. Nuclear Regulatory Commission  
Office of Inspection and Enforcement  
Region I  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Dr. Murley:

NRC INSPECTION REPORT 50-354/83-08  
NO. 1 UNIT  
HOPE CREEK GENERATING STATION

On July 1, 1983 we received the Notice of Deviation that accompanied the above referenced Inspection Report. The following responds to the Notice of Deviation, which stated in part:

The Hope Creek PSAR, Tables 15.4-1 and 15.4-2, states that valves classified as Quality Group C shall comply with the requirements of the ASME Nuclear Pump and Valve Code, Class III.

Contrary to this requirement, RHR heat exchanger secondary side pressure relief valves supplied by General Electric complied with the requirements of Section VIII of the ASME Code.

PSAR Table 15.4-1 specifies the use of the Nuclear Pump and Valve Code for Quality Group C valves. These valves channel, block or regulate the flow of fluids through the system. However, the valves in question are not system action valves, but rather are provided to protect the tube side of the vessel against excessive pressure caused by increased fluid temperature (thermal relief). We are required by the code to design these protective devices in accordance with the design code of the vessel. The tube side of the vessel is designed to the requirements of ASME Section VIII, Division 1. Paragraph UG-125 therein states, "all pressure vessels

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within the scope of this Division of Section VIII, irrespective of size or pressure, shall be provided with protective devices in accordance with the requirements" specified in Division I of Section VIII.

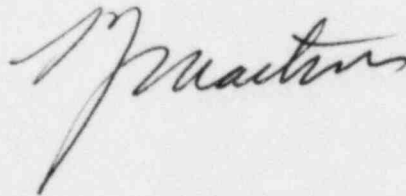
In contrast, the Nuclear Pump and Valve Code (1968) was a draft document that contained no specific criteria for the design of pressure relief devices.

We have investigated the code compliance status of the pressure relief valves on the shell side of the heat exchanger and concluded that they are also appropriate for their intended service.

At our request, Bechtel Power Corporation, our Architect/Engineer had investigated compliance of Hope Creek Generating Station equipment to the codes specified in Table 15.4-1. The results of the investigation indicate that the subject deviation is unique to the equipment purchased by General Electric prior to the effective date of the 1971 edition of the ASME Code. Subsequently, all ASME Code requirements for relief valves were consolidated.

In order to prevent any additional confusion, we have instructed our Architect/Engineer, Bechtel Power Corporation, to generate an FSAR Change Notice to expand Section 5.4.7.2.4 to specifically address the code requirements for the RHR heat exchanger relief valves.

Very truly yours,



cc: Office of Inspection and Enforcement  
Division of Reactor Construction Inspection  
Washington, D. C.

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