

Public Service
Electric and Gas
Company

Steven E. Miltenberger

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-1100

Vice President and Chief Nuclear Officer

JUN 10 1991

NLR-N91092

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

Gentlemen:

AMENDED REQUEST FOR
REVISION TO IST PROGRAM
HOPE CREEK GENERATING STATION
DOCKET NO. 50 -354

Public Service Electric and Gas Company (PSE&G) hereby forwards an amendment to our letter, dated February 1, 1991 - REVISION TO IN-SERVICE TESTING PROGRAM. In that letter, PSE&G requested relief from the requirements of ASME Section XI, Paragraph IWV - 3512 and PTC 25.3 and recognition of current Technical Specification reference to ANSI/ANS 3.1-1981 qualification requirements.

The specific relief requested includes the qualification requirements of personnel supervising testing of the 'C' relief valves. Per the cited provisions of the Code, " a person who has obtained a degree in a branch of Engineering from a recognized school of Engineering and in addition, has had at least two years of practical experience in fluid-flow measurement, may be considered qualified to supervise the test".

PSE&G proposes that personnel supervising this testing meet all of the requirements cited in PTC 25.3-1976 with the exception of two years practical experience in fluid-flow measurement.

No fluid-flow measurement is required by ASME Section XI, and none is performed to satisfy this requirement. The requirement provides no compensating increase in the level of quality or safety and has no effect on the performance of relief valve testing.

Sincerely,



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JUN 10 1991

C Mr. S. Dembek
USNRC Licensing Project Manager

Mr. T. P. Johnson
USNRC Senior Resident Inspector

Mr. T. T. Martin, Administrator
USNRC Region I

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