

Public Service  
Electric and Gas  
Company

Stanley L. Bruna

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-1200

Vice President - Nuclear Operations

OCT 10 1991

NLR-N91131

LCR 91-08

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

Gentlemen:

LICENSE AMENDMENT APPLICATION  
REMOVAL OF VESSEL MATERIAL WITHDRAWAL SCHEDULE  
GENERIC LETTER 91-01  
HOPE CREEK GENERATING STATION  
FACILITY OPERATING LICENSE NPF-57  
DOCKET NO. 50-354

This letter submits an application for amendment to Appendix A of Facility Operating License NPF-57 for the Hope Creek Generating Station and is being filed in accordance with the provisions of 10CFR50.90. This amendment application proposes changes to Technical Specification (TS) 3/4.4.6, "Pressure/Temperature Limits", and its associated Bases in accordance with the guidance contained in Generic Letter 91-01, "Removal of the Schedule for Withdrawal of Reactor Vessel Material Specimens from Technical Specifications. Specifically, Table 4.4.6.1.3-1, "Reactor Vessel Material Surveillance Program - Withdrawal Schedule", is being removed, and references to the table in TS 3/4.4.6 and the associated Bases are being deleted. In addition to the Generic Letter 91-01 endorsed changes, an additional change to the Bases for TS 3/4.4.6 is being proposed to correct an editorial error.

Attachment 1 contains a detailed description of the proposed changes along with our 10CFR50.92 significant hazards consideration analysis. Marked up TS pages showing the proposed changes are included as Attachment 2.

In accordance with 10CFR50.91(b)(1), a copy of this request has been sent to the State of New Jersey as indicated below. Upon NRC approval, please issue a License Amendment which will be effective upon issuance and shall be implemented within 60 days of issuance. This latitude permits appropriate procedural modifications necessary to implement the proposed changes.

9111010245 911010  
PDR ADOCK 05000354  
P PDR

A001  
11

OCT 10 1991

Should you have any questions or comments on this transmittal, do not hesitate to contact us.

Sincerely,



Affidavit  
Attachments (2)

C Mr. Stephen Dembek  
Licensing Project Manager

Mr. T. P. Johnson  
Senior Resident Inspector

Mr. T. Martin, Administrator  
Region I

Mr. Kent Tosch, Chief  
New Jersey Department of Environmental Protection  
Division of Environmental Quality  
Bureau of Nuclear Engineering  
CN 415  
Trenton, NJ 08625

STATE OF NEW JERSEY           )  
  ) SS.  
COUNTY OF SALEM               )

Stanley LaBruna, being duly sworn according to law deposes and says:

I am Vice President - Nuclear Operations of Public Service Electric and Gas Company, and as such, I find the matters set forth in our letter dated OCT 10 1991, concerning the Hope Creek Generating Station, are true to the best of my knowledge, information and belief.

Stanley LaBruna

Subscribed and Sworn to before me  
this 10 day of Oct., 1991

Elizabeth J. Kidd  
Notary Public of New Jersey

My Commission expires on 4/25/95

ELIZABETH J. KIDD  
Notary Public of New Jersey  
My Commission Expires April 25, 1995

ATTACHMENT 1  
PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS

LICENSE AMENDMENT APPLICATION  
REMOVAL OF VESSEL MATERIAL WITHDRAWAL SCHEDULE  
GENERIC LETTER 91-01  
HOPE CREEK GENERATING STATION  
FACILITY OPERATING LICENSES NPP-57  
DOCKET NO. 50-354

NLR-N91131  
LCR 91-08

I. Description of Change

On January 4, 1991, the NRC issued Generic Letter 91-01, "Removal of the Schedule for Withdrawal of Reactor Vessel Material Specimens from Technical Specifications." The purpose of Generic Letter 91-01 was to provide guidance to licensees on preparation of a license amendment application to remove the Technical Specification (TS) schedule for the withdrawal of reactor vessel material specimens. The Generic Letter 91-01 guidance was followed in preparing this amendment application. In addition to the generic letter endorsed changes, an editorial change to correct an error in the TS Bases is also included in this request. Each of the proposed changes is described below.

1. Table 4.4.6.1.3-1, "Reactor Vessel Material Surveillance Program - Withdrawal Schedule", is being removed.
2. Reference to the Table 4.4.6.1.3-1 in Surveillance Requirement 4.4.6.1.3 is being removed. Specifically, the phrase "in accordance with the schedule in Table 4.4.6.1.3-1" is being deleted.
3. Reference to the Table 4.4.6.1.3-1 in the final paragraph of Bases Section 3/4.4.6 is being replaced with a reference to UFSAR Section 5.3. Specifically, the phrase "Table 4.4.6.1.3-1 to assure compliance with the requirements of Appendix H to 10 CFR Part 50" is being replaced with the phrase "UFSAR Section 5.3 and Appendix 5A."
4. The multiplier for the values of neutron fluence on the ordinate of Bases Figure B 3/4 4.6-1 is being changed from  $10^{-18}$  to  $10^{-18}$ .

II. Reason for Change

This change is being submitted to remove an unnecessary requirement from the TSs and to correct an editorial error in the TS Bases.

III. Justification for Change

The proposed changes are justified as follows:

#### A. Generic Letter Endorsed Changes

The provisions of Section II.B.3 of 10 CFR 50 Appendix H require that any change to the vessel material withdrawal schedule be approved by the NRC prior to implementation. As a result, control of changes to the schedule by way of a TS requirement duplicates the requirements of Appendix H. The NRC concluded in Generic Letter 91-01 that, since changes to the schedule are controlled by Appendix H, removal of the schedule from the TSs will not result in any loss of regulatory control. Since no changes to the withdrawal schedule would be permitted by the proposed changes, and since regulatory control would be maintained, the changes are purely administrative in nature.

The generic letter requires that a licensee proposing to delete the withdrawal schedule from TSs commit to maintaining the NRC approved version of the schedule in the UFSAR. Based on review of the Hope Creek UFSAR, it has been determined that all of the information contained in TS Table 4.4.6.1.3-1 is already included in the UFSAR. The withdrawal schedule is included on Page 5.3-11 and Page 5A-10 while the lead factors and vessel locations are contained on Page 5A-9.

#### B. Correction of Editorial Error

The multiplier for the values of neutron fluence on the ordinate of Bases Figure B 3/4 4.6-1 is incorrect. Since the proposed change corrects an editorial error in the existing TS Bases, the change is purely administrative in nature.

### IV. Significant Hazards Consideration Evaluation

In accordance with the requirements of 10CFR50.91 and using the criteria of 10CFR50.92, a significant hazards consideration analysis has been completed for the proposed changes to the Hope Creek Generating Station Technical Specifications. As a result of this analysis, it has been concluded that the proposed changes:

1. Do not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes remove an unnecessary and redundant requirement from the TSs and correct an editorial error in the TS Bases. These changes are purely administrative in nature. No changes to the vessel material surveillance program would be permitted as a result of these changes. The surveillance program would continue to be implemented in accordance with applicable regulations (10 CFR 50 Appendix H) and regulatory control of the program would be maintained. The changes would in no way impact or alter the configuration or operation of the facility and would not affect any accident initiators or accident analysis assumptions. As a result, the proposed change would not significantly increase the probability or consequences of an accident previously evaluated.

2. Do not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes are purely administrative in nature. The changes would allow regulatory control over the vessel material surveillance program to be maintained in accordance with the requirements of 10CFR50 Appendix H. The changes would in no way impact or alter the configuration or operation of the facility and no new modes of plant operation would be created. As a result, the proposed change would not create the possibility of a new or different kind accident from any accident previously evaluated.

3. Do not involve a significant reduction in a margin of safety.

Removal of the redundant TS requirements and correction of the editorial error in the TS Bases are considered administrative changes. These changes would not affect the material surveillance program and regulatory control over the program would be maintained through the requirements of 10CFR50 Appendix H. The changes would in no way impact or alter the configuration or operation of the facility and would not affect any TS or safety limit. As a result, the proposed change would not significantly reduce any margin of safety.

#### V. Conclusion

As discussed in Item IV above, PSE&G has concluded that the proposed changes to the Technical Specifications do not involve a significant hazards consideration since the changes (i) do not involve a significant increase in the probability or consequences of an accident previously evaluated, (ii) do not create the possibility of a new or different kind of accident from any accident previously evaluated, and (iii) do not involve a significant reduction in a margin of safety.