



State of New Jersey  
Department of Environmental Protection and Energy  
CN 415  
Trenton, NJ 08625-0402

Scott A. Weiner  
Commissioner

April 6, 1992

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

Dear Sir or Madame,

Subject: Hope Creek Nuclear Generating Station  
Docket No. 50-354  
License Change Request 89-13

In a letter dated February 3, 1992, Public Service Electric and Gas Company (PSE&G) submitted the subject license change request to the Nuclear Regulatory Commission (NRC). The license change request proposes to eliminate the Technical Specification required main steam line isolation and automatic reactor shutdown functions of the main steam line radiation monitors. The NRC generically approved the elimination of such functions in a Safety Evaluation Report (SER) dated May 15, 1991. The SER documented the NRC review of the General Electric Company Licensing Topical Report, NEDO-31400, "Safety Evaluation for Eliminating the Boiling Water Reactor Main Steam Line Isolation Valve Closure Function and SCRAM Function of the Main Steam Line Radiation Monitor."

Pursuant to 10 CFR 50.91(b), the New Jersey Department of Environment Protection & Energy's Bureau Of Nuclear Engineering (BNE) reviewed the subject license change request. The BNE also reviewed the NRC SER on the General Electric Company Licensing Topical Report. Based on this review, the BNE has the following comment.

As stipulated in the NRC SER, nuclear power plant licensees may reference the General Electric Company Licensing Topical Report in support of a license change request to eliminate the control functions of the main steam line radiation monitors provided the change request meets three conditions. One condition is that the change request include "... sufficient evidence (implemented or proposed operating procedures, or equivalent commitments) to provide reasonable assurance that increased levels of radioactivity in the main steam lines will be controlled expeditiously to limit occupational doses and environmental releases (emphasis added)."

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Attachment 3 of License Change Request 89-13 addresses the conditions set forth in the NRC SER for referencing the General Electric Company Licensing Topical Report. In response to the above quoted condition, PSE&G merely states in Attachment 3 that Hope Creek "... has, in place, procedures that ensure any significant increase in the levels of radioactivity in the main steam lines is promptly controlled ..." Such a statement does not give the BNE reasonable assurance that elevated levels of radioactivity will be controlled. PSE&G should provide additional detail regarding the specific procedures that are in place, including required operator actions. The BNE recommends that the NRC not approve License Change Request 89-13 until PSE&G provides the additional detail and the BNE has had the opportunity to review it.

If you have any questions, please contact Suren Singh at (609) 987-2033 or Chris Dell at (609) 987-2086.

Sincerely,

  
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Bureau of Nuclear Engineering

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