

Public Service  
Electric and Gas  
Company

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United States Nuclear Regulatory Commission  
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Gentlemen:

**TECHNICAL SPECIFICATION AFFIRMATION  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354**

Prior to start-up following the sixth refueling outage, as a result of a question by the NRC Resident Inspector, a determination was made that some control rods that had undergone maintenance had not been scram time tested during the cold hydrostatic test of the reactor coolant system. This was an oversight of Technical Specification requirements for a conditional surveillance (4.1.3.2.b), which requires that the maximum scram insertion time of control rods be demonstrated following maintenance that could affect their scram insertion time. As a result, the prerequisite conditions were re-established and scram time testing was successfully accomplished.

In response to this discovery and other similar issues identified by PSE&G during the refueling outage, a Technical Specification review was performed to assure that required Technical Specification surveillance tests were completed prior to start-up. As part of the affirmation, each department reviewed the Technical Specification surveillances assigned to them and verified that surveillance requirements were met. In addition, the Operations Department reviewed the work orders that were completed during the outage, the inoperable equipment log, and the pending retests to ensure that required surveillance tests and retests were identified and performed. The Quality Assurance/Nuclear Safety Review organization performed an independent assessment of the affirmation process. The Licensing organization performed a review of start-up procedures to ensure specific Technical Specification required surveillances were addressed. In addition, Licensing provided the conditional Technical Specification surveillances to System Engineering. System Engineering field verified that the conditional Technical Specifications were performed, as required.

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Additionally, Hope Creek management, including Senior Nuclear Shift Supervisors, attended training on the Technical Specifications prior to start-up. This training re-enforced Senior Management expectations concerning Technical Specification usage and compliance.

During the affirmation process, the following was determined:

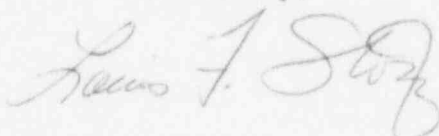
Some valves in the Residual Heat Removal system remained in service during the outage potentially without being properly surveillance tested. Investigation has determined that the surveillance requirements did not apply; therefore, this issue was closed.

Two circuit breakers did not pass the surveillance requirements of Technical Specification 4.8.4.1.a.2. The Technical Specification requires an expanded sample size if any of the circuit breakers fail their surveillance tests. The sample was not originally expanded because credit was taken for the larger than required original sample size. During the Technical Specification Affirmation process, a determination was made that this decision was inappropriate. The sample size was expanded and the additional circuit breakers were tested satisfactorily prior to start-up; thereby averting a Technical Specification violation.

The adequacy of the documentation for the implementation of the Leakage Reduction Program to meet the requirements of Technical Specification 6.8.4 was questioned. After this issue was identified, the appropriate documentation was completed.

With the exception of the above-listed items, the review demonstrated that the plant had maintained control over the Technical Specification surveillance process. The net effect of the above discoveries was minimal. Should you have any questions or comments, please contact us.

Sincerely,



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