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Nuclear Business Unit

AUG 07 1996

LR-N96183

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

Gentlemen:

REVISION TO RELIEF REQUEST V-20 OF THE INSERVICE TESTING PROGRAM
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354

Public Service Electric and Gas Company (PSE&G) requests approval of the attached revision to Relief Request Number V-20 to the Hope Creek Generating Station Inservice Testing Program. Relief Request V-20 had been previously submitted as part of Revision 2 to the Hope Creek Generating Station (HCGS) Inservice Testing Program submittal pursuant to 10CFR50.55a(f)(6)(i) and was subsequently approved.

This Relief Request is applicable to the Emergency Diesel Generator (EDG) air start solenoid valves. The Alternate Testing associated with Relief Request V-20 submitted in Revision 2 states, "Stroke time testing of these valves will be indirectly observed by verifying the startup times of the Emergency Diesel Generators to be less than 10 sec by performing monthly (or more frequent) surveillance operability testing per HCGS Technical Specification 4.8.1.1.2."

A self-assessment of the HCGS Inservice Testing Program has identified that, contrary to the above Alternate Testing, one air start solenoid valve per EDG is isolated every third month on an alternating basis during the referenced surveillance testing. For the air start valve that is isolated every third month, the described stroke time testing has not been performed. The isolation of one air start solenoid valve was in response to INPO SOER 80-1. The purpose for this action is to ensure independent testing of the redundant EDG air start subsystems.

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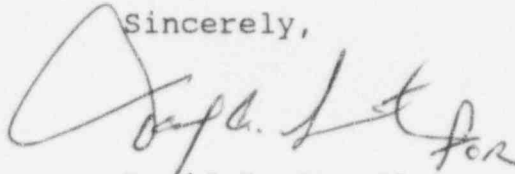
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As an interim compensatory action, two EDG starts are now being performed on the third month when the air start solenoids are independently isolated. This interim measure assures compliance with the current alternate test frequency and the SOER response commitment.

The attached revised relief request adopts a quarterly alternate testing frequency which is consistent with Subsection IWV-3411 of Section XI of the ASME Code and provides continued compliance with the SOER commitment without requiring a redundant EDG start each quarter.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. R. Powell", is written over the word "Sincerely,".

David R. Powell
Manager-
Licensing and Regulation

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Attachments: 1. Revised Relief Request V-20

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HOPE CREEK GENERATING STATION
INSERVICE TESTING PROGRAM
SECTION 5 - REQUESTS FOR RELIEF

RELIEF REQUEST NO. V-20

COMPONENTS: 1KJ-SV-7535A 1KJ-SV-7536A
1KJ-SV-7535B 1KJ-SV-7536B
1KJ-SV-7535C 1KJ-SV-7536C
1KJ-SV-7535D 1KJ-SV-7536D

FUNCTION: Admit starting air to the air distribution header on each Emergency Diesel Generator (EDG).

ASME CLASS CATEGORY: 3/B

TEST REQUIREMENT: Subsection IWV-3413(b) requires the stroke time of all power operated valves to be measured to the nearest second, for stroke times 10 sec or less, whenever such a valve is full-stroke tested. Subsection IWV-3411 requires that Category A and B valves be exercised at least once every 3 months.

BASIS FOR RELIEF: It is impractical to directly measure the stroke times of these valves due to a lack of remote or local valve position indication. These valves are sealed solenoid valves and have no external indication of actual stem or obturator movement. Also, these valves are not provided with an independent handswitch and cannot be independently operated. Valve operation is controlled by the EDG circuitry.

Additionally, these valves are integral components of the EDG skids and can be considered "skid-mounted". Per section 3.4 of NUREG-1482, the staff has determined that the testing of the major component is an acceptable means for verifying the operational readiness of skid-mounted and component subassemblies. Hope Creek Technical Specification 4.8.1.1.2 specifies the surveillance testing required to prove EDG operability and requires, in part, that each EDG start from standby condition and achieve 3950 volts and ≥ 58.8 hz in ≤ 10 seconds. Performance of this surveillance will verify the operational readiness of these solenoid valves.

ALTERNATE TESTING: Verification of the stroke times of these valves will be performed quarterly coincident with the required operability testing specified by Hope Creek Technical Specification 4.8.1.1.2. The valve stroke times will be indirectly observed by verifying that the EDG start parameters are achieved in less than or equal to 10 seconds. Individual valve operation will be verified by observing a subsequent pressure drop in the associated starting air reservoir. This position is supported by Section 3.4 of NUREG-1482.