



**PSEG** Public Service  
Electric and Gas  
Company

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Robert L. Mittl General Manager  
Nuclear Assurance and Regulation

May 1, 1985

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, MD 20814

Attention: Mr. Albert Schwencer, Chief  
Licensing Branch 2  
Division of Licensing

Gentlemen:

REACTOR BUILDING NEGATIVE LEAK RATE TEST CRITERION  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354

The HCGS reactor building and its penetrations are designed to limit the leakage rate into the building to 10 percent of the buildings free volume per day with a negative internal pressure of 0.25 inches water gauge. Based on the 10 percent per day design inleakage criteria, the drawdown of the reactor building pressure by the Filtration Recirculation Ventilation System (FRVS) is completed within approximately the first 168 seconds following a LOCA.

The drawdown times and doses associated with a reactor building inleakage of 100 percent per day have been evaluated for HCGS. The results of these analyses, provided in FSAR Sections 6.2.3.3 and 15.6.5.5.3, demonstrate that with a reactor building inleakage rate of 100 percent per day the resulting doses would be less than the allowable limits of GDC 19 and 10CFR100. Based on the results of these analyses the HCGS Draft Technical Specifications, submitted for NRC review on January 17, 1985, provide surveillance requirements for the FRVS (Technical Specification Section 3/4.6.5) that verify at least once per 18 months that the four FRVS vent units will drawdown the reactor building to greater than or equal to 0.25 inches of vacuum water gauge in less than or equal to 375 seconds and that the FRVS, operating for four hours, maintains greater than or equal to 0.25 inches vacuum water gauge in the reactor building at an exhaust rate not exceeding 3324 CFM. The reactor building drawdown time of 375 seconds and exhaust rate of 3324 CFM are based on a 100 percent per day reactor building inleakage.

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1/0* *Add: L. Ruth - CSR  
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The HCGS Safety Evaluation Report (SER) Section 6.2.3 documents the commitment to verify the design inleakage rate and drawdown time by preoperational and periodic tests. It is PSE&G's position that establishing the reactor building design inleakage rate of 10 percent per day and the associated drawdown time as acceptance criteria for preoperational and periodic tests of the FRVS is overly conservative. As the analyses referenced above indicate that the consequences of assuming a 100 percent per day reactor building inleakage rate are acceptable, PSE&G respectfully requests NRC concurrence on using a 100 percent per day inleakage rate and associated drawdown time as the acceptance criteria for preoperational and periodic testing of the FRVS.

We are available to discuss at the earliest opportunity any questions or concerns you may have in this regard.

Very truly yours,

*R. L. Mittel* / *RAP*

C D. H. Wagner  
USNRC Licensing Project Manager

A. R. Blough  
USNRC Senior Resident Inspector