



**PSE&G** Public Service  
Electric and Gas  
Company

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Robert L. Mittl General Manager  
Nuclear Assurance and Regulation

May 23, 1985

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

Attention: Mr. Walter Butler, Chief  
Licensing Branch 2  
Division of Licensing

Gentlemen:

REQUEST FOR ADDITIONAL INFORMATION - QUALITY ASSURANCE  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354

In a letter to Public Service Electric and Gas Company (PSE&G) dated March 7, 1985, the NRC staff requested additional information regarding the quality assurance program to be implemented at Hope Creek during the operations phase. The information below provides PSE&G's response to this request for additional information.

Item 1 - Information Requested

FSAR Amendment 8 (page 1.8-11) added the words underlined below to PSE&G's commitment to Regulatory Guide 1.26: "In addition, items designated 'R' in Table 3.2-1 will be included in the QA Program during operation to the extent required by Regulatory Guide 1.143." Regulatory Guide 1.143, "Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants," addressed QA for design and construction, but it does not address QA for operations. Identify what QA measures will be applied to items designated 'R' in Table 3.2-1 during the operations phase of the Hope Creek Generating Station.

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The Energy People

PSE&G Response

Items designated 'R' are covered by the QA Program during operations.

Section 17.2.2 of the HCGS FSAR states, in part:

- a. "This (QA) program is applied to items and activities that can affect the health and safety of the public, ..." During the operational phase, this includes..."

-and-

- b. "Safety-related activities delineated in Regulatory Guide 1.33 and summarized in Table 17.2-1, Section A and additional NRC requirements contained in Table 17.2-1, Section B."

This section further states:

"The quality assurance program is applied during the operational phase using a graded approach to the extent consistent with the item's or activity's importance to safety."

Table 17.2-1, Hope Creek Q Activities/Services states, in part:

The listing below identifies those activities and services, to which the quality assurance program applies during operations:

- A. Safety-related activities delineated in Regulatory Guide 1.33, Appendix A (see Regulatory Guide for further breakdown of activities)..."

-and-

"6. Control of radioactivity

- (a) Liquid radioactive waste system
- (b) Solid waste system
- (c) BWR gaseous effluent system.."

Item 2 - Information Requested

FSAR Amendment 9 addresses PSE&G's QA Program for fire protection in several locations:

- a) Page 20 of Table 11.1-1, describing differences from SRP acceptance criteria, states:  
  
"...certain fire system components purchased and installed prior to July 1, 1978, such as the fire water storage tanks, the tank heaters and associated controls, and the valve pit heaters are excluded from the 'F' program."
- b) Section 9.5.1.1.19 on page 9.5.12, discussing the QA program for Bechtel's responsibilities, says the same thing.
- c) Comment 61 added to page 40 of Table 3.2-1, states:  
" 'F' Program is not retroactive to components purchased and installed prior to July 1, 1978. Fire water storage tanks, the tank heaters and associated controls, and the valve pit unit heaters are excluded from the 'F' program."

Clarify that each of these statements refer to the design and construction phase, and identify what QA measures will be applied to these items during the operations phase.

PSE&G Response

The QA program for fire protection will be applied to the above components during the operations phase. The last sentence of comment 61, Table 3.2-1, will be revised to read:

"Fire water storage tanks, the tank heaters and associated controls, and the valve pit unit heaters are excluded from the 'F' Program during the design and construction phase, but will be included in the QA Program for fire protection during the operations phase."

In addition, applicable drawings and specifications will be revised as required to reflect F-designated classification.

Item 3 - Information Requested

FSAR Amendment 9 (page 33 of Table 3.2-1) changed the seismic category of the unit vent stacks from I to NA and the corresponding QA requirements from Y (10 CFR 50, Appendix B) to N (QA requirements not applicable). Justify or eliminate these changes.

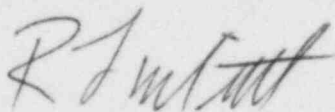
PSE&G Response

The unit vent stack, North and South (including structural steel support framing) is not seismic category I. The justification is as follows:

- a) Adequate ventilation would still be available for all safety-related equipment in the event of blockage or failure of these vent paths.
- b) FSAR Section 11.5.2.2.1 also states that, during accident conditions, all flows from compartments that could be expected to release significant radioactive materials can be isolated.
- c) The only radiation monitoring systems that are located in the unit vent stacks, north and south, are classified as non-Class 1E, as described in FSAR Sections 11.5.2.2.1 and 11.5.2.2.2, respectively.

Should there be any further questions or concerns regarding the above subjects, please contact us.

Very truly yours,



C D. H. Wagner  
USNRC Licensing Project Manager

A. R. Blough  
USNRC Senior Resident Inspector