PSE&G Public Service Electric and Gas Company

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Robert L. Mittl General Manager
Nuclear Assurance and Regulation

May 21, 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:

HOPE CREEK GENERATING STATION
DOCKET NO. 50-354
NRC GENERIC LETTER 83-28
REQUEST FOR ADDITIONAL INFORMATION

Pursuant to NRC request for additional information (RAI) pertaining to "Preliminary Staff Review of Generic Letter 83-28 Responses, Hope Creek Generating Station" (letter from A. Schwencer (NRC) to R. L. Mittl (PSE&G) dated March 19, 1985), Public Service Electric and Gas Company hereby submits the enclosed information.

Should you have any questions in this regard, please contact us.

Very truly yours,

R L Mittl

Enclosure

C D. H. Wagner
USNRC Licensing Project Manager

A. R. Blough
USNRC Senior Resident Inspector

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HOPE CREEK GENERATING STATION RESPONSE TO NRC
REQUEST FOR ADDITIONAL INFORMATION - PRELIMINARY STAFF
REVIEW OF GENERIC LETTER 83-28 RESPONSE

Item 2.1 (part 1) EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE (REACTOR TRIP SYSTEM COMPONENTS)

Position

Applicant needs to confirm that the review of the RTS classification program is complete and that it verifies that RTS components are classified as safety-related and identified as such on all documentation and in information handling systems.

Response

a) Review of the Reactor Trip System (RTS) classification is complete.

b) As evidenced by the above review, items identified as required for RTS are classified as Q (safety related) on the appropriate design documents, however, the Hope Creek Generating Station Master Equipment List (MEL) does not currently address the level of component required to comply with this concern. As a result of this, PSE&G is currently expanding the MEL to include miscellaneous electrical devices for Q systems such as relays, trip units, and limit switches. Our initial focus will be the Reactor Trip System, however, all Q systems will be included.

   This effort will be completed by September 30, 1985.

Item 2.2.1 EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE (PROGRAMS FOR ALL SAFETY RELATED COMPONENTS)

Position

Applicant needs to respond to sub-item 6 regarding classification of equipment important to safety.

Response

PSE&G's position is that equipment that is important to safety is safety-related and therefore does not distinguish between these terms. PSE&G does recognize the need for the assurance of the specified operation of certain

non-safety-related structures, systems and components, such as fire protection systems, radioactive waste treatment, handling and storage systems, and Seismic Category II/I items. Such assurance is documented through the specification of limited quality assurance programs (described in FSAR Table 3.2-1, footnotes (22), (50) and (52). Classification of this equipment is provided on various design documents.

Item 2.2.2 EQUIPMENT CLASSIFICATION AND VENDOR INTERFACE (PROGRAMS FOR ALL SAFETY-RELATED COMPONENTS)

Position

Applicant needs to present his evaluation of the NUTAC program and describe how it will be implemented at Hope Creek 2. This program needs to be supplemented because it fails to address the establishment and maintenance of an interface between the applicant and all vendors of safety-related equipment to assure that vendor technical information is kept current, complete, and is incorporated, as appropriate, into plant procedures and maintenance instructions. The response should also address concerns about division of responsibility between applicant and their vendors who provide maintenance or testing services to assure that needed control is maintained over procedures and maintenance instructions.

Response

The Vendor Equipment Technical Information Program (VETIP), as defined in the March 1984 NUTAC document, is considered a valid response to Section 2.2.2 of the NRC Generic Letter 83-28. Public Service Electric and Gas Company has formally recognized the VETIP and implementation of VETIP computer data-base programs are active. The VETIP is utilized as a supplement to existing Vendor Manual review procedures at Hope Creek Generating Station. All vendor technical documents used at Hope Creek Generating Station require engineering approval prior to use. This approval includes vendor interface as required.

Item 3.1.3 POST-MAINTENANCE TESTING (REACTOR TRIP SYSTEM COMPONENTS)

Position

Applicant needs to state if they have found any post maintenance testing requirements for either RTS components or other safety-related equipment that may degrade safety. If

any such are identified, the applicant shall describe actions to be taken including submitting needed Technical Specification changes.

Response

The Draft Hope Creek Technical Specifications have been developed based on the BWR Standard Technical Specifications (i.e., NUREG-0123).

The Draft Hope Creek Technical Specifications do not delineate that post-maintenance testing of the Reactor Protection System (RPS) be performed following maintenance activities.

Post-maintenance testing of the RPS, as well as all other safety-related systems, is required by Station Administrative Procedure SA-AP.ZZ-009(Q), Control of Station Maintenance. In order to demonstrate post-maintenance RPS operability, testing of the effected portion(s) of the RPS will be accomplished by performing the applicable technical specification surveillance(s).

Item 3.2.3 POST-MAINTENANCE TESTING (ALL OTHER SAFETY-RELATED COMPONENTS)

Response

HCGS considers the required performance of the applicable technical specification surveillances to constitute post-maintenance testing. The Draft Hope Creek Technical Specifications have been developed based on the BWR Standard Technical Specifications (i.e., NUREG-0123). As of this date eighteen (18) Draft Hope Creek Technical Specifications explicitly delineate that surveillance (i.e., post-maintenance testing) be performed following maintenance activities. These technical specifications are listed in Attachment I.

The Hope Creek Generating Station has not yet operated and therefore has not generated any historical operating data from which to determine any potential adverse impact on safety as a result of post-maintenance testing. Based on a review and evaluation of the aforementioned Draft Hope Creek Technical Specifications, the Hope Creek Generating Station does not perceive the post-maintenance testing required by the technical specifications to degrade safety. As a result, no changes to these surveillance test (i.e., post-maintenance testing) requirements are required at this time.

Item 4.5.3 REACTOR TRIP SYSTEM RELIABILITY (SYSTEM FUNCTIONAL TESTING)

Position

Applicant needs to describe and present the results of the BWROG's review of the proposed on-line testing intervals. The response shall consider the concerns of sub-items 4.5.3.1 through 4.5.3.5 of the generic letter, show how the selected intervals result in high reactor trip system availability, and present any resulting Technical Specification changes for staff review.

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the technical specification surveillance requirements. The licensee needs to address this conclusion.

Response

PSE&G is an active participant in the BWR Owners Group Technical Specification Improvement Committee which is tasked with evaluating the testing intervals and allowable out of service times for two key BWR systems: the Reactor Protection System (RPS) and the Emergency Core Cooling Systems. As a part of its work scope, the committee was also tasked in preparing the response for Item 4.5.3 of Generic Letter 83-28. The committee submitted the 83-28 response to the NRC in January 1985. Key items of the report are as follows:

- o The Owners Group response evaluated the current Standard Technical Specification testing requirements and concluded that such testing is adequate to assure high reactor protection system availability.
- o While the study was performed on a generic basis, a review of plant specific configurations revealed that the results would not be expected to change significantly from plant to plant.
- o The report shows that while the current testing frequency is adequate, there is room for improvement. The improvements would result in increased plant availability and reduced component wearout while

still maintaining a high degree of RPS availability. These improvements are detailed in a second Owners Group report dealing with changes in RPS testing frequency. This report will be submitted to the NRC in the second quarter of 1985.

PSE&G endorses the BWR Owners Group report and feels that in light of the items highlighted above, no additional input or analysis is required to close out Item 4.5.3. Testing of the backup scram valves is included in the 18 month Reactor Protection System Logic System Functional Tests.

Please be advised that PSE&G has included a modified version of the Standard RPS technical specification in our draft technical specification submittal. The changes to the STS are in accordance with those recommended by the Owners Group in the follow-up report mentioned above.

IM:gs

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ATTACHMENT I

TECHNICAL SPECIFICATION NO.	TECHNICAL SPECIFICATION TITLE	SURVEILLANCE REQ'T NUMBER(S)
3/4.1.3.2	Control Rod Maximum Insertion Times	4.1.3.2.b
3/4.1.3.3	Control Rod Average Scram Insertion Times	4.1.3.3
3/4.1.3.4	Four Control Rod Group Scram Insertion Times	4.1.3.4
3/4.1.3.6	Control Rod Drive Coupling	4.1.3.6.c
3/4.1.3.8	Control Rod Drive Housing Support	4.1.3.8
3/4.4.8	Structual Integrity	4.4.8.2.b
3/4.6.1.3	Primary Containment Air Locks	4.6.1.3.b.2 4.6.1.3.d.3
3/4.6.3	Primary Containment Isolation Valves	4.6.3.1
3/4.6.5	Reactor Building Integrity	4.6.5.2.a
3/4.6.5.3	Filtration, Recirculation and Ventilation System (FRVS)	4.6.5.3.b.1 4.6.5.3.b.2 4.6.5.3.b.3 4.6.5.3.e 4.6.5.3.f

ATTACHMENT I (CONT'D)

TECHNICAL SPECIFICATION NO.	TECHNICAL SPECIFICATION TITLE	SURVEILLANCE REQ'T NUMBER(S)
3/4.7.2	Control Room Emergency Filtration System	4.7.2.c.1 4.7.2.c.2 4.7.2.c.3 4.7.2.f 4.7.2.g
3/4.7.6	Sealed Source Contamination	4.7.6.2.c
3/4.7.8	Fire Barrier Penetrations	4.7.8.f
3/4.8.1	A.C. Sources	4.8.1.1.2.i
3/4.8.4.2	Motor Operated Valves Thermal Overload Protection (Bypassed)	4.8.4.2.1.b
3/4/.8.4.3	Motor Operated Valves Thermal Overload Protection (Not Bypassed)	4.8.4.3
3/4.9.1	Reactor Mode Switch	4.9.1.3
3/4.9.10.2	Multiple Control Rod Removal	4.9.10.2.2