Public Service
Electric and Gas
Company

E. C. Simpson

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LR-N97245
LCR H97-01

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

**SUPPLEMENT TO REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
REVISED 10CFR50.92 NO SIGNIFICANT HAZARDS ANALYSIS
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354**

Gentlemen:

On March 3, 1997, Public Service Electric & Gas (PSE&G) Company transmitted License Change Request (LCR) H97-01 to the NRC. That LCR requested several changes to various Technical Specifications (TS) and TS Bases for the Hope Creek Generating Station (HC). The purpose of this submittal is to provide a revised 10CFR50.92 No Significant Hazards Analysis which: 1) addresses each one of the proposed changes individually; and 2) provides additional details on the nature of some of the requested changes. Other than the No Significant Hazards Analysis, no changes are being made to LCR submittal made on March 3, 1997.

The revised 10CFR50.92 evaluation, with a determination of no significant hazards consideration, is provided in Attachment 1 of this letter. In accordance with 10CFR50.91(b)(1), a copy of this submittal has been sent to the State of New Jersey.

Should you have any questions regarding this request, we will be pleased to discuss them with you.

Sincerely,

E C Simpson

Affidavit
Attachment (1)

C Mr. H. Miller, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. D. Jaffe, Licensing Project Manager - HC
U. S. Nuclear Regulatory Commission
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11555 Rockville Pike
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Mr. R. Summers (X24)
USNRC Senior Resident Inspector - HC

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33 Arctic Parkway
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REF: LR-N97245
LCR H97-01

STATE OF NEW JERSEY)
) SS.
COUNTY OF SALEM)

E. C. Simpson, being duly sworn according to law deposes and says:

I am Senior Vice President - Nuclear Engineering of Public Service Electric and Gas Company, and as such, I find the matters set forth in the above referenced letter, concerning Hope Creek Generating Station, Unit 1, are true to the best of my knowledge, information and belief.

E C Simpson

Subscribed and Sworn to before me
this 5th day of May, 1997

Kimberly Jo Brown
Notary Public of New Jersey

KIMBERLY JO BROWN
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires April 21, 1998

My Commission expires on _____

HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354
REVISIONS TO THE TECHNICAL SPECIFICATIONS (TS)

10CFR50.92 EVALUATION

Public Service Electric & Gas (PSE&G) has concluded that the proposed changes to the Hope Creek Generating Station (HC) Technical Specifications do not involve a significant hazards consideration. In support of this determination, an evaluation of each of the three standards set forth in 10CFR50.92 is provided below.

REQUESTED CHANGE

The proposed changes affect the following sections of the Hope Creek TS: 1) 3/4.3.1, "Reactor Protection System Instrumentation"; 2) 3/4.3.2, "Isolation Actuation Instrumentation"; 3) 3/4.3.3, "Emergency Core Cooling System Actuation Instrumentation"; 4) Surveillance Requirement 4.0.5; 5) 3/4.6.1, "Primary Containment" and associated Bases; 6) 3/4.7.7, "Main Turbine Bypass System"; and 7) the Bases for 3/4.8, "Electrical Power Systems". Specifically, these changes are being made to: 1) provide additional information pertaining to response time testing; 2) update references to 10CFR50 requirements; 3) reflect plant modifications to containment isolation valves; 4) provide appropriate guidance for the main turbine bypass system and 5) incorporate Bases changes associated with implementation of Hope Creek TS Amendment No. 75.

BASIS

1. *The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.*

The proposed changes for the TS related to response time testing reflect testing methodologies that were approved by the NRC in Amendment No. 85 to the Hope Creek TS. These proposed TS revisions involve: 1) no hardware changes; 2) no significant changes to the operation of any systems or components in normal or accident operating conditions; and 3) no changes to existing structures, systems or components. Therefore, these changes will not increase the probability of an accident previously evaluated. Since the plant systems associated with these proposed changes will still be capable of: 1) meeting all applicable design basis requirements; and 2) retain the capability to mitigate the

consequences of accidents described in the HC UFSAR, the proposed changes were determined to be justified. As a result, these changes will not involve a significant increase in the consequences of an accident previously evaluated.

The proposed changes to Surveillance Requirement 4.0.5 do not alter the current requirements for the Hope Creek inservice inspection and inservice testing programs and are considered to be editorial in nature. These proposed TS revisions involve: 1) no hardware changes; 2) no significant changes to the operation of any systems or components in normal or accident operating conditions; and 3) no changes to existing structures, systems or components. Therefore, these changes will not increase the probability of an accident previously evaluated. Since the plant systems associated with these proposed changes will still be capable of: 1) meeting all applicable design basis requirements; and 2) retain the capability to mitigate the consequences of accidents described in the HC UFSAR, the proposed changes were determined to be justified. As a result, these changes will not involve a significant increase in the consequences of an accident previously evaluated.

The proposed changes to the drywell and suppression chamber purge system are being made to justify design modifications to that system. As discussed in NRC Notice of Violation 50-354/96-10-01, this design modification replaced isolation valves containing resilient material seals with metal seated valves under 10CFR50.59. As a result of this modification, a 24 month frequency has been implemented to perform Type C tests on these new metal seated valves. PSE&G has concluded that the 24 month frequency is appropriate for the new valves since: 1) this frequency is imposed by Surveillance Requirement 4.6.1.2.d, which is applicable to similar containment isolation valves in Table 3.6.3-1 that penetrate the primary containment; and 2) concerns raised about severe environment-induced degradation and frequent use for the previously installed resilient seal material valves are not applicable to the replacement metal seat valves. PSE&G has concluded that the valve modification was an enhancement to the Hope Creek design that did not impact the isolation capability of the drywell and suppression chamber purge system. No significant changes were made to the operation of these valves in normal or accident operating conditions. As a result, these changes will not increase the probability of an accident previously evaluated. Since the plant systems associated with these proposed changes will still be capable of: 1) meeting all applicable design basis requirements; and 2) retain the capability to mitigate the consequences of accidents described in the HC UFSAR, the proposed changes were determined to be

justified. As a result, these changes will not involve a significant increase in the consequences of an accident previously evaluated.

The proposed changes to LCO 3.7.7 establish consistent and appropriate requirements for main turbine bypass valve operability requirements. These changes do not impact the assumptions contained in these UFSAR analyses since they do not change the manner in which Hope Creek is currently permitted to operate. Since the ACTION Statement for LCO 3.7.7 already allows indefinite continued operation below 25% of RATED THERMAL POWER with an inoperable main turbine bypass valve system, the proposed modification to the APPLICABILITY statement for this LCO does not involve: 1) hardware changes; 2) significant changes to the operation of any systems or components in normal or accident operating conditions; or 3) changes to existing structures, systems or components. Therefore these changes will not increase the probability of an accident previously evaluated. Since the plant systems associated with these proposed changes will still be capable of: 1) meeting all applicable design basis requirements; and 2) retain the capability to mitigate the consequences of accidents described in the HC UFSAR, the proposed changes were determined to be justified. As a result, these changes will not involve a significant increase in the consequences of an accident previously evaluated.

The proposed changes to the HC emergency diesel generator (EDG) TS Bases include information contained in the Safety Evaluation Report for Technical Specification Amendment No. 75. This information concerns the bases for the allowed-outage-time (AOT) for the C and D EDGs. Concerning the revisions to planned C and D EDG outages, PSE&G believes that implementation of 10CFR50.65 requirements to monitor EDG unavailability will provide an acceptable and more clearly defined method for maintaining EDG availability within acceptable limits. As stated in PSE&G's letter LR-N97167, dated March 21, 1997, Hope Creek will not plan C or D EDG outages that exceed 72 hours if the total unavailability of the EDG will be greater than 720 hours on a 12 month rolling basis. The proposed TS revisions involve: 1) no hardware changes; 2) no significant changes to the operation of any systems or components in normal or accident operating conditions; and 3) no changes to existing structures, systems or components. Therefore these changes will not increase the probability of an accident previously evaluated. Since the plant systems associated with these proposed changes will still be capable of: 1) meeting all applicable design basis requirements; and 2) retain the capability to mitigate the consequences of accidents described in the HC UFSAR, the proposed changes were

determined to be justified. As a result, these changes will not involve a significant increase in the consequences of an accident previously evaluated.

2. *The proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.*

The proposed changes for the TS related to response time testing reflect testing methodologies that were approved by the NRC in Amendment No. 85 to the Hope Creek TS and are being made to clarify the licensing basis for performing response time testing. The proposed changes will not adversely impact the operation of any safety related component or equipment. Since the proposed changes involve: 1) no hardware changes; 2) no significant changes to the operation of any systems or components; and 3) no changes to existing structures, systems or components, there can be no impact on the occurrence of an accident previously evaluated. Furthermore, there is no change in plant testing proposed in this change request that could initiate an event. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes to Surveillance Requirement 4.0.5 do not alter the current requirements for the Hope Creek inservice inspection and inservice testing programs and are considered to be editorial in nature. The proposed changes will not adversely impact the operation of any safety related component or equipment. Since the proposed changes involve: 1) no hardware changes; 2) no changes to the operation of any systems or components; and 3) no changes to existing structures, systems or components, there can be no impact on the occurrence of an accident previously evaluated. Furthermore, there is no change in plant testing proposed in this change request that could initiate an event. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes to the drywell and suppression chamber purge system are being made to justify design modifications to that system. As discussed in NRC Notice of Violation 50-354/96-10-01, this design modification replaced isolation valves containing resilient material seals with metal seated valves under 10CFR50.59. As a result of this modification, a 24 month frequency has been implemented to perform Type C tests on these new metal seated valves. PSE&G has concluded that the 24 month

frequency is appropriate for the new valves since: 1) this frequency is imposed by Surveillance Requirement 4.6.1.2.d, which is applicable to similar containment isolation valves in Table 3.6.3-1 that penetrate the primary containment; and 2) concerns raised about severe environment-induced degradation and frequent use for the previously installed resilient seal material valves are not applicable to the replacement metal seat valves. PSE&G has concluded that the valve modification was an enhancement to the Hope Creek design that did not impact the isolation capability of the drywell and suppression chamber purge system. Since the proposed changes will not adversely impact the operation of any safety related component or equipment, there can be no impact on the occurrence of any accident. Furthermore, there is no change in plant testing proposed in this change request that could initiate an event. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes to LCO 3.7.7 establish consistent and appropriate requirements for main turbine bypass valve operability requirements. These changes do not impact the assumptions contained in these UFSAR analyses since they do not change the manner in which Hope Creek is currently permitted to operate. Since the ACTION Statement for LCO 3.7.7 already allows indefinite continued operation below 25% of RATED THERMAL POWER with an inoperable main turbine bypass valve system, the proposed modification to the APPLICABILITY statement for this LCO does not involve: 1) hardware changes; 2) significant changes to the operation of any systems or components in normal or accident operating conditions; or 3) changes to existing structures, systems or components. The proposed changes will not adversely impact the operation of any safety related component or equipment. Since the proposed changes involve: 1) no significant hardware changes; 2) no significant changes to the operation of any systems or components; and 3) no changes to existing structures, systems or components, there can be no impact on the occurrence of any accident. Furthermore, there is no change in plant testing proposed in this change request that could initiate an event. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes to the HC emergency diesel generator (EDG) TS Bases include information contained in the Safety Evaluation Report for Technical Specification Amendment No. 75. This information concerns the bases for the allowed-outage-time (AOT) for the C and D EDGs. Concerning the revisions to planned C and D EDG outages, PSE&G believes that implementation of 10CFR50.65

requirements to monitor EDG unavailability will provide an acceptable and more clearly defined method for maintaining EDG availability within acceptable limits. As stated in PSE&G's letter LR-N97167, dated March 21, 1997, Hope Creek will not plan C or D EDG outages that exceed 72 hours if the total unavailability of the EDG will be greater than 720 hours on a 12 month rolling basis. The proposed changes will not adversely impact the operation of any safety related component or equipment. Since the proposed changes involve: 1) no hardware changes; 2) no significant changes to the operation of any systems or components; and 3) no changes to existing structures, systems or components, there can be no impact on the occurrence of any accident. Furthermore, there is no change in plant testing proposed in this change request which could initiate an event. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. *The proposed change does not involve a significant reduction in a margin of safety.*

The proposed changes for the TS related to response time testing reflect testing methodologies that were approved by the NRC in Amendment No. 85 to the Hope Creek TS. No changes are being made to methodologies with this proposal. Therefore, the changes contained in this request do not result in a significant reduction in a margin of safety.

The proposed changes to Surveillance Requirement 4.0.5 do not alter the current requirements for the Hope Creek inservice inspection and inservice testing programs and are considered to be editorial in nature. Therefore, the changes contained in this request do not result in a significant reduction in a margin of safety.

The proposed changes to the drywell and suppression chamber purge system are being made to reflect design modifications that have been installed. This design modification replaced isolation valves containing resilient material seals with metal seated valves under 10CFR50.59. PSE&G has concluded that the 24 month frequency is appropriate for the new valves since: 1) this frequency is imposed by Surveillance Requirement 4.6.1.2.d, which is applicable to other containment isolation valves in Table 3.6.3-1 that penetrate the primary containment; and 2) concerns raised about severe environment-induced degradation and frequent use for the previously installed resilient seal material valves are not applicable to the replacement metal seat valves. The valve modification was an enhancement to the Hope Creek design

that did not impact the isolation capability of the drywell and suppression chamber purge system, and does not result in a significant reduction in a margin of safety.

The proposed changes to LCO 3.7.7 establish consistent and appropriate requirements for main turbine bypass valve operability requirements. These changes do not impact the assumptions contained in these UFSAR analyses since they do not change the manner in which Hope Creek is currently permitted to operate. Since the ACTION Statement for LCO 3.7.7 already allows indefinite continued operation below 25% of RATED THERMAL POWER with an inoperable main turbine bypass valve system, the proposed modification to the APPLICABILITY statement for this LCO would be editorial in nature. Therefore, the changes contained in this request do not result in a significant reduction in a margin of safety.

The HC TS Bases will be revised to include information contained in the Safety Evaluation Report for Technical Specification Amendment No. 75. This information concerns the bases for the allowed-outage-time (AOT) for the C and D emergency diesel generators (EDGs). PSE&G believes that implementation of 10CFR50.65 requirements to monitor EDG unavailability limits will provide an acceptable and more clearly defined method for maintaining EDG availability within acceptable limits and not result in a significant reduction in a margin of safety.

CONCLUSION

Based on the above, PSE&G has determined that the proposed changes do not involve a significant hazards consideration.