



NOV 15 2010

10 CFR 50
10 CFR 51
10 CFR 54

LR-N10-0406

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Hope Creek Generating Station
Facility Operating License No. NPF-57
NRC Docket No. 50-354

Subject: PSEG Nuclear, LLC Review of the Safety Evaluation Report with Open Items
Associated with the Hope Creek Generating Station License Renewal Application

References: 1. Letter from Mr. Carl J. Fricker, PSEG Nuclear LLC, "Application for Renewed
Operating License – Hope Creek Generating Station," dated August 18, 2009

2. Letter from Brian E. Holian, USNRC, "SAFETY EVALUATION REPORT
RELATED TO THE LICENSE RENEWAL OF HOPE CREEK GENERATING
STATION," dated September 30, 2010

In the Reference 1 letter, PSEG Nuclear, LLC (PSEG) submitted a License Renewal Application for the Hope Creek Generating Station; which would extend the term of the current operating license an additional 20 years.

In Reference 2, the U.S. Nuclear Regulatory Commission issued the Safety Evaluation Report with Open Items related to the Hope Creek Generating Station License Renewal Application (SER) and requested PSEG to review the SER and provide comments to the staff within 45 days of the date of that letter.

PSEG has completed its review of the SER. Enclosure A contains the responses to Open Item OI 3.0.3.1.2-1 and Confirmatory Item CI 3.0.3.1.20-1. Confirmatory Item CI 4.3.5.2-1 remains under evaluation and will be addressed in a separate letter. Enclosure B provides PSEG comments on the SER.

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NRC

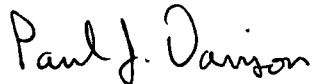
NOV 15 2010

If you have any questions, please contact Mr. Ali Fakhar, PSEG Manager - License Renewal, at 856-339-1646.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 11/15/2010

Sincerely,



Paul J. Davison
Vice President, Operations Support
PSEG Nuclear LLC

- Enclosures:
- A. Responses to Open and Confirmatory Items Associated with Safety Evaluation Report with Open Items – Hope Creek Generating Station
 - B. Comments Related to Safety Evaluation Report with Open Items – Hope Creek Generating Station

- cc:
- William M. Dean, Regional Administrator – USNRC Region I
 - B. Brady, Project Manager, License Renewal – USNRC
 - R. Ennis, Project Manager – USNRC
 - NRC Senior Resident Inspector – Hope Creek
 - P. Mulligan, Manager IV, NJBNE
 - L. Marabella, Corporate Commitment Tracking Coordinator
 - T. Devik, Hope Creek Commitment Tracking Coordinator

Enclosure A

**Responses to Open and Confirmatory Items Associated with Safety Evaluation
Report with Open Items - Hope Creek Generating Station**

Open Item	OI 3.0.3.1.2-1
Confirmatory Item	CI 3.0.3.1.20-1

Open Item OI 3.0.3.1.2-1: (SER Section 3.0.3.2.12 - Buried Piping and Tanks Inspection Program)

LRA Section B.2.1.24 describes the existing Buried Piping Inspection Program as consistent, with an enhancement, with GALL AMP XI.M34, "Buried Piping and Tanks Inspection." The applicant stated that the program provides aging management of carbon steel, galvanized steel, ductile cast iron, and gray cast iron buried piping susceptible to general corrosion, pitting, crevice corrosion, and microbiologically-influenced corrosion. The applicant also stated that the program relies on the visual inspection of excavated piping, including the associated coatings and wrappings. The applicant further stated that there are no buried tanks within the scope of license renewal. LRA Section B.2.2.4 describes the existing Buried Non-Steel Piping Inspection Program as a plant-specific program. The applicant stated that the Buried Non-Steel Piping Inspection Program is a condition monitoring program used to manage buried reinforced concrete piping and components in its service water system for cracking, loss of bond, increase in porosity and permeability, and loss of material. The Buried Non-Steel Piping Inspection Program also manages buried stainless steel piping and components in the condensate storage and transfer system and fire protection systems for loss of material.

Given the recent industry events involving leakage from buried or underground piping, the staff needs further information to evaluate the applicant's account for the industry and any plant-specific operating experience in its Buried Piping Inspection Program. This issue remains an open item as OI 3.0.3.1.2-1.

PSEG Response:

On August 6, 2010, the NRC staff issued RAI B.2.1.24 requesting additional information about the Hope Creek Generating Station Buried Piping Program, including relevant information to evaluate the applicant's account for the industry and any plant-specific operating experience. PSEG Nuclear responded to that request in its letter LR-N10-0323, dated September 1, 2010.

After reviewing that response, the staff determined that additional information was required, and issued RAI B.2.1.24-02 on October 12, 2010. PSEG Nuclear provided that additional information in its letter LR-N10-0371, dated October 29, 2010.

PSEG believes that the information provided in its License Renewal Application and the two letters described above constitute sufficient information for the NRC staff to close Open Item OI 3.0.3.1.2-1.

Confirmatory Item CI 3.0.3.1.20-1: (SER Section 3.0.3.1.20 - Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements)

LRA Section B.2.1.37 describes the new Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Program as consistent with GALL AMP XI.E3, "Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements." The applicant stated that its program manages inaccessible medium voltage cables that are exposed to significant moisture simultaneously with significant voltage. The applicant stated that significant moisture is defined as periodic exposure to moisture that lasts more than a few days (e.g., cable in standing water). The applicant also stated that significant voltage exposure is defined as being subject to system voltage for more than 25 percent of the time.

During its review, the staff noted that recently identified industry operating experience has shown that the presence of water or moisture can be a contributing factor in inaccessible power cable failures at lower service voltages (480 volts (V) to 2 kilovolts (kV)). The applicant has provided a commitment to expand the scope of the Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Program to include cables at lower service voltages (480 V to 2 kV) and to eliminate the exclusion of cables not subject to system voltage for more than 25 percent of the time. The staff and the applicant have reached an agreement regarding the applicant's proposed frequency for manhole inspections and cable testing. However, the staff has not received the applicant's commitment at this time. This issue remains a confirmatory item CI 3.0.3.1.20-1.

PSEG Response:

PSEG Nuclear provided its commitment to shorten the maximum frequencies for manhole inspections and cable testing under its Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Program in PSEG letter LR-N10-0360, dated September 30, 2010. PSEG believes that the information provided in that letter constitutes sufficient information for the NRC staff to close Confirmatory Item CI 3.0.3.1.20-1.

Enclosure B

Comments Related to Safety Evaluation Report with Open Items

Hope Creek Generating Station

The table on the following pages contains comments and suggestions for NRC staff consideration, based upon PSEG Nuclear's review of the Hope Creek Generating Station Safety Evaluation with Open Items (SER).

An item number is provided in column 1, the SER Section number is given in column 2, the SER page number is listed in column 3 and the comment is provided in column 4.

PSEG Comments on Safety Evaluation Report With Open Items Related to the License Renewal of Hope Creek Generating Station			
Where suggested changes to the SER are provided, they are highlighted with <i>bolded italics</i> for inserted text and strikethroughs for deleted text.			
#	Section #	Page #	Comment
1	Abstract	iii	Page iii, line thirteen, the Hope Creek station gross electrical output is approximately 1,268 megawatt electric, not 1,061. Sentence should be revised as follows: "The licensed power output of the unit is 3,840 megawatt thermal with a gross electrical output of approximately 1,061 1,268 megawatt electric."
2	1.1	1-1	Page 1-1, Section 1.1 second full paragraph, second to last sentence, the estimated gross electrical output should be 1,268 megawatt not 1,061. Sentence should be revised as follows: "The licensed power output of the unit is 3,840 megawatt thermal with a gross electrical output of approximately 1,061 1,268 megawatt electric."
3	1.3	1-6	Page 1-6, should the second full paragraph on page 1-6 that discusses the 10 CFR 54.21(b) requirement also contain a statement acknowledging that the requirement was met as documented in PSEG letter LR-N10-0234, dated June 24, 2010?
4	1.6	1-8	Page 1-8, Section 1.6, first paragraph, there are two (not one) confirmatory items identified by the Staff. Paragraph should be revised as follows: "As a result of its review of the LRA, including additional information submitted through September 21, 2010, the staff identified one two confirmatory items (CIs). An item is considered confirmatory if the staff and the applicant have reached a satisfactory resolution but the applicant has not yet formally submitted the resolution. The staff has assigned a unique identifying number to the each CI."
5	2.1.4.1	2-9	Page 2-9, first paragraph, Exposure Limits section, sixth line revise as follows so statement agrees with UFSAR. "The exposure limit requirements in 10 CFR 50.34(a)(1) and 10 CFR 50.67(b)(2) are is not applicable to HCGS license renewal." The very next sentence states "The UFSAR refers to both 10 CFR 50.67 and 10 CFR 100 for accident exposure limits."

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#	Section #	Page #	Comment
6	2.1.5.2.2	2-25	Page 2-25, first paragraph, ninth line revise as follows: "During the scoping and screening methodology audit, the staff discussed the screening methodology with the applicant and reviewed the applicant's screening reports for the makeup demineralizer system, the radwaste system, <i>and</i> the service water system, and auxiliary feedwater system , to verify proper implementation of the screening process." HC does not have an aux feedwater system.
7	2.3.2.5	2-38	Page 2-38, Section 2.3.2.5.1 third paragraph, last sentence, suggest revision as follows to clarify: "There is also a lube oil system for HPCI which provides control oil to operate the main pump bearings, the turbine stop and control valve, and multiple other components."
8	2.3.3.10.2	2-54	Page 2-54, first paragraph, revise second sentence as follows: "Active components that are part of the diesel engine assembly are not in the scope of license renewal and <i>but</i> are not subject to an AMR."
9	2.4.7	2-87	Page 2-87, the second paragraph, the bullet items and third paragraph should be changed to read: <i>The drywell houses the RPV, the reactor coolant recirculation system, safety relief valves, the branch connections of the reactor primary system, the drywell spray header, and internal structures. The internal structures consist of a fill slab, reactor pedestal, biological shield wall and its lateral support structural steel, and miscellaneous steel.</i> <ul style="list-style-type: none"> ● pressure suppression chamber (torus) ● vent system ● vacuum breaker system ● pipng, instrument lines, and electrical penetrations

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#	Section #	Page #	Comment
10	2.4.7	2-88	<p>Page 2-88, the third, fourth and fifth paragraphs should be revised as follows to include the RPV ring girders:</p> <p>"In a letter dated March, 31, 2010, the staff issued RAI 2.4-5 and requested that the applicant clarify the inclusion of the RPV and torus ring girders (shown in UFSAR Figure 3.8-1) as one of the components subject to an AMR per Table 2.4-7, "primary containment," since LRA Table 2.4-7 does not include both components."</p> <p>"In its response dated April 22, 2010, the applicant stated that the torus ring girder is included in LRA Table 2.4-7 and is within the scope of license renewal and is, therefore, subject to an AMR. Furthermore, the response stated that the RPV ring girder is included in LRA Table 2.4-4 as component type "Supports for ASME Class 1 Piping and Components (support members; welds; bolted connections; support anchorage to building structure)."</p> <p>"Based on its review, the staff finds the response to RAI 2.4-5 acceptable because the torus and RPV ring girders has have been included within the scope of license renewal and is are subject to an AMR."</p>
11	3.0.3.1.7	3-28	<p>Page 3-28, third bullet item related to BWRVIP-27-A should be deleted as LRA Page C-2 states it is not included for HGGS. • BWRVIP-27-A, "BWR Standby Liquid Control System/Core Plate AP Inspection and Flaw Evaluation Guidelines"</p>
12	3.0.3.1.7	3-28	<p>Page 3-28, fourth bullet item related to BWRVIP-47-A should be deleted as LRA page C-6 states "Fatigue usage is considered a TLAA for lower plenum components". • BWRVIP-47-A, "BWR Lower Plenum Inspection and Flaw Evaluation Guidelines"</p>

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#	Section #	Page #	Comment
13	3.0.3.1.7	3-30	Page 3-30, fourth paragraph second sentence appears to be inaccurate with respect to information contained in the LRA. SER states "The applicant stated that it has performed flaw evaluations for previously identified indications which are discussed in LRA Section 4.3." HC LRA Page C-9 states "Hope Creek has not performed flaw evaluations for found indications in accordance with subsection IWB-3600 of ASME Section XI for the 40-year life of the plant. Therefore there are no indications that require re-evaluation for the period of extended operation."
14	3.0.3.1.10	3-36	Page 3-36, third line suggest revising as follows to better align with the program description in the LRA: "The applicant also stated that this program includes frequent <i>periodic</i> leak testing of valves, piping, and other system components, especially those constructed of carbon and stainless steel; and preventive monitoring that checks air quality at multiple locations in the system to ensure that oil, water, rust, dirt, and other contaminants are kept within accepted limits."
15	3.0.3.1.20	3-54	Page 3-54, concerning Section 3.0.3.1.20, based on responses to RAI's B.2.1.37-1, B.2.1.37-2, and information provided in the LRA supplement dated September 7, 2010, and pending resolution of confirmatory item CI 3.0.3.1.20-1, the E3 Program has been enhanced to include 480 volt power cables and reduced the maximum testing and inspection frequencies. This enhanced program should be in SER section 3.0.3.2, AMPs That Are Consistent with the GALL Report with Exceptions or Enhancements.
16	3.0.3.2.4	3-83	Page 3-83, first paragraph, last sentence states "...the following bolting materials should not be used..." It should say "the following bolting materials should not be <i>reused</i> ..."

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#	Section #	Page #	Comment
17	3.0.3.2.6	3-87	Page 3-87 - sub-section "Enhancement 1" -1st sentence: wrong program element is referenced, suggest revision as follows: "LRA Section B.2.1.15 states that an enhancement will be made to the "scope of the program" and "detection of aging effects" <i>"parameters monitored and inspected"</i> program elements."
18	3.0.3.2.6	3-88	Page 3-88, sub-section "Enhancement 2" - 1st sentence: wrong program element is referenced, suggest revision as follows: "LRA Section B.2.1.15 states that an enhancement will be made to the "scope of the program" and "detection of aging effects" <i>"parameters monitored and inspected"</i> program elements."
19	3.0.3.2.12	3-109	Page 3-109, sub-section "UFSAR Supplement" - 2nd paragraph does not include discussion about the additional 6 inspections being performed during years 50-60, as documented in RAI B.2.1.24. Suggest revision as follows: "The applicant also committed to perform a focused excavation and inspection of each of the above materials in the first 10 years upon entering the period of extended operation, unless an opportunistic inspection occurs within this 10-year period. <i>In the applicant's response to RAI B.2.1.24, submitted September 1, 2010, the applicant revised Commitment 24 to also include excavation and inspection of each of the above materials during the second 10 year interval of the period of extended operation.</i> "
20	3.0.3.2.12	3-109	Page 3-109, sub-section "UFSAR Supplement"- 2nd paragraph, 2nd sentence: does not completely reflect the content of Commitment 24, as revised in RAI B.2.1.24, submitted 9/1/2010. Suggest revision as follows: "Specifically, the applicant committed to perform at least one opportunistic or focused excavation and inspection of carbon steel, <i>galvanized steel</i> , ductile cast iron and gray cast iron piping and components within 10 years prior to entering the period of extended operation."

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#	Section #	Page #	Comment
21	3.0.3.2.17	3-129	Page 3-129, Section 3.0.3.2.17, first paragraph starting on the sixth line, suggest revision to paragraph as shown below to better reflect descriptions in LRA Appendix B B.2.1.33. "The applicant further stated that HCGS is not committed to RG 1.127; however, HCGS has been implementing the guidance of RG 1.127 for the structures within the scope of license renewal. These structures include The water control structures included in scope of license renewal are the service water intake structure and shoreline protection and dike structures. The applicant further stated that accessible structures are monitored on a frequency of 5 years, consistent with the frequency for implementing the requirements of the 10 CFR 50.65 Maintenance Rule, and that its The program will be enhanced to include an inspection frequency of 5 years for all structural components including submerged portions of the Service Water Intake Structure. inspection frequency of 5 years for SCs submerged in water."
22	3.0.3.2.19	3-145	Page 3-145, first paragraph, second sentence should be revised as follows: "The staff noted the applicant evaluated this condition and indicated that the latest trend for these events is 3.5 heat-up transients per year and 3.5 cool-down transients per year, which is more frequent than the previous average trend of 3 heat-up transients per year and 3 cool-down transients per year based on a 40 year life limit of 120 transients. "
23	3.0.3.2.19	3-145	Page 3-145, second paragraph, fourth line, change as follows: "The staff noted that, as of December 2007, the total number of heat-up cycles and cool-down cycles was 79, and that according to the UFSAR Technical Specifications , each of these transients had a limiting design basis allowable of 120."

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#	Section #	Page #	Comment
24	3.0.3.3.3	3-158	Section 3.0.3.3.3 revise last paragraph to clarify as follows: "The staff reviewed the LRA and noted that the condensate storage tank and its associated tank vent bird screen are the only <i>outdoor</i> aboveground non-steel tanks <i>and components</i> being managed by this AMP. The staff also noted all the other non-steel tanks <i>in scope for license renewal</i> are <i>located indoor and are</i> managed under different AMPs (e.g., Water Chemistry Program, <i>Periodic Inspection Program</i> and Closed-Cycle Cooling Water System Program)."
25	3.1.2.1.2	3-207	Page 3-207, third and fourth paragraphs, last sentence in each paragraph should be re-worded to remove the statements "that is not conducive for loss of material" and replace with statement such as "to reduce susceptibility to IGSCC". Section topic is related to Cracking Due to Stress-Corrosion Cracking, Intergranular Stress-Corrosion Cracking, and Irradiation-Assisted Stress-Corrosion Cracking, not loss of material.
26	3.1.2.2.1	3-218	Page 3-218 second paragraph, last two sentences appear to be errors, as the two sentences are discussing pump and valve closure bolting and the paragraph topic item 3.1.1-5 is associated with reactor internals.
27	3.1.2.2.8	3-228	Page 3-228, section 3.1.2.2.8 item 1, third paragraph, appears to be in error as the paragraph discusses isolation condensers and refers to SRP-LR Section 3.1.2.2.4 item 2, section 3.1.2.2.8.1 is associated with jet pump sensing lines.
28	3.3	3-269	Page 3-268, list of systems beginning on page 3-268 does not include the Primary Containment Leakage Rate Testing System. This system should be added to the list since it is an Auxiliary System.

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#	Section #	Page #	Comment
29	Table 3.3.1	3-272	Page 3-272, Item number 3.3.1-11 references both the Periodic Inspection and Structures Monitoring AMPs. In the response to RAI 3.3.2.2.5.2 the Structures Monitoring AMP was deleted from this item number. Suggest revising to delete Structures Monitoring from the "AMP in LRA, Supplements, or Amendments" column for item number 3.3.1-11.
30	Table 3.3.1	3-272	Page 3-272, Item number 3.3.1-12 references the Structures Monitoring AMP and states that the line is consistent with GALL. In the response to RAI 3.3.2.2.5.2 the Structures Monitoring AMP was deleted from this item number and the line became not applicable to HCGS. Suggest revising to delete Structures Monitoring from the "AMP in LRA, Supplements, or Amendments" column for item number 3.3.1-12. This item number is not applicable.
31	Table 3.3.1	3-275	Page 3-275, Item number 3.3.1-28 references both the Fire Protection and Fire Water System AMPs. In the response to RAI 3.3.2.2.10.6-01 the Fire Protection AMP was deleted from this item number. Suggest revising to delete Fire Protection from the "AMP in LRA, Supplements, or Amendments" column for item number 3.3.1-28.
32	Table 3.3.1	3-283	Page 3-283, Item number 3.3.1-71 references both the Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components and the Fire Protection AMPs. In the response to RAI 3.3.1-01 the Fire Protection AMP was deleted from this item number. Suggest revising to delete Fire Protection System from the "AMP in LRA, Supplements, or Amendments" column for item number 3.3.1-71.

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#	Section #	Page #	Comment
33	3.3.2.1.3	3-298	Page 3-298, last sentence, suggest revision as follows to delete aging mechanism so statement is accurate: "For all AMR lines associated with item 3.3.1-45, the environment is air - indoor and the aging effect being managed is loss of preload due to self-loosening. " The aging effect/aging mechanism for the AMR line items in the mechanical systems (except for fuel handling and storage and cranes & hoists) associated with 3.3.1-45 is loss of preload due to thermal effects, gasket creep and self loosening.
34	3.3.2.1.4	3-301	Page 3-301, fourth paragraph needs clarification based upon LRA Table 3.3.2-10 in that the paragraph states that the LRA credits the Fire Protection program to manage aging of carbon steel doors and halon gas bottles and that a generic E note and plant-specific note 1 are cited. Plant-specific note 1 states that the Fire Protection AMP is substituted for the External Surfaces Monitoring AMP recommended by GALL for the "Doors" component type, however, the "Gas Bottles (Halon)" component type cites plant-specific note 15. Plant-specific note 15 states that the Fire Protection AMP will be used in addition to the External Surfaces Monitoring AMP recommended by GALL.
35	3.3.2.2.5.1	3-316 & 3-317	Page 3-316, last paragraph and Page 3-317, fourth paragraph discuss and evaluate how the Structures Monitoring program will be used to manage Hardening and Loss of Strength Due to Elastomer Degradation for the inflatable pool seals in the Reactor Building. Response to RAI 3.5.2.2.5.2 provided information that these pool seals are not subject to AMR and revised the LRA as such. Based on the RAI response the Structures Monitoring AMP does not manage aging of the inflatable pool seals in the Reactor Building.

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#	Section #	Page #	Comment
36	3.5.2.1.3	3-408	<p>Page 3-408, based upon RAI 3.3.2.2.5.2 as discussed in SER section 3.3.2.2.5 (2) the second, third and fourth paragraphs should be deleted and a conclusion statement such as the following should be added.</p> <p><i>Based on the staff's review, including the response to RAI 3.3.2.2.5.2 as discussed in SER Section 3.3.2.2.5 (2), Hardening and Loss of Strength Due to Elastomer Degradation, the staff finds the applicant's evaluation acceptable.</i></p>
37	4.2.7.2	4-13	<p>Page 4-13, Section 4.7.2, second paragraph, fourth sentence is not accurate with respect to the thickness of the HCGS RPV compared to a BWR/6 RPV and also does not represent an accurate summary of the LRA discussion in the Analysis section on page 4-20 of the LRA on the subject. The sentence currently reads "The staff also noted that because the RPV wall thickness is a major parameter in determining stresses due to thermal shock, it was reasonable for the applicant to conclude that stresses in the thinner HCGS RPV would be bounded by those from a thicker BWR/6 RPV."</p>
38	4.3.1.2	4-16	<p>Page 4-16, second full paragraph, third line, revise as follows: "In UFSAR Table 3.9-1a, the loss of feedwater heaters transient is separated into two transients of turbine trip with 100 percent steam bypass, and turbine trip with partial feedwater heater bypass, with 3 cycles and 20 cycles, respectively."</p>
39	4.3.1.2	4-16	<p>Revise the last paragraph on the page as follows: "Based on its review, the staff finds the applicant's response, as amended, to RAI 4.3-01, Part 1 acceptable because the applicant clarified that the fatigue analyses for the feedwater nozzle account for the turbine trip with 100 percent steam bypass and the turbine trip with partial..."</p>

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#	Section #	Page #	Comment
40	4.3.5.2	4--28	Page 4-28, sixth paragraph, third line, uses the phrase "most representative of the sample locations". Suggest re-word to better reflect information provided in response to RAI 4.3-05. "The applicant provided a table that clarified its basis for selecting the RCPB locations that were considered to be <i>the equivalent bounding HCGS</i> most representative of the sample locations recommended in NUREG/CR-6260, as applied to new-vintage General Electric designed BWRs."
41	4.3.5.2	4-29	Page 4-29, the following changes are suggested to Table 4.3.5-1 "Basis for Accepting Applicant EAF Analysis Locations": (1) First column, first row remove the words "RV Feedwater Nozzle", (2) Third column first row change the weld material for the CRD housing-to-nozzle weld from nickel-alloy to stainless steel, (3) fourth column, first row change "60-year CUF" to "60-year EAF."
42	4.3.5.2	4-31	Page 4-31, Table 4.3.5-1, last row of table in Staff's Basis for Accepting the Applicant's EAF Component Location for Class 1 Feedwater Piping conflicts with Confirmatory Issue CI 4.3.5.2-1 on page 1-8 of the SER.
43	4.3.5.2	4-32	Page 4-32, second bulleted statement at top of page should be corrected as follows to be consistent with the RAI 4.3-06 response: "For all cases, the temperatures used in derivation of the Fen factors assumed a design temperature of 550 °F; for the feedwater nozzles, the derivation of the Fen factor used the <i>maximum</i> temperature for each transient analyzed load <i>pair</i> in the CUF calculation for the component."
44	4.6.3.2	4-40	Page 4-40, section 4.6.3.2, second sentence, suggest revising "179 cycles" to "174 cycles" to be consistent with LRA Table 4.3.1-1 on page 4-26.
45	Appendix A	A-19	Page A-19, for Item No. 50, in the Source column, the Source is Section 3.0.2 of NUREG-1800, not Section 3.0.2 of the LRA.

**PSEG Comments on Safety Evaluation Report
With Open Items Related to the License Renewal of Hope Creek Generating Station**

Where suggested changes to the SER are provided, they are highlighted with ***bolded*** ***italics*** for inserted text and strikethroughs for deleted text.

#	Section #	Page #	Comment
46	Appendix B	N/A	Four PSEG letters to NRC were omitted from Appendix B. These letters are LR-N10-0136 (April 22, 2010), LR-N10-0248 (July 19, 2010), LR-N10-0308 (August 18, 2010) and LR-N10-0305 (September 1, 2010). For completeness, these should be added.