PSEG

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Nuclear Business Unit

LR-N000095

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

Gentlemen:

ASME CODE SECTION XI
ANALYTICAL EVALUATION OF WALL THINNING
ALTERNATIVE TO REQUIREMENTS OF ASME SECTION XI
HOPE CREEK AND SALEM GENERATING STATIONS
DOCKET NOs. 50-354, 50-272, AND 50-311.

Pursuant to 10CFR50.55a (a) (3) (i), Public Service Electric and Gas Company (PSE&G) hereby requests the Nuclear Regulatory Commission (NRC) to approve the use of an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI (IWA-4000) regarding the evaluation of a component where the section thickness has been reduced below minimum design thickness. ASME Boiler and Pressure Vessel Code Section XI (IWA-4000) provides the process for assessing a component for continued service after a defect has been removed. This provision stipulates that where the section thickness has been reduced below the minimum design thickness, the component shall be repaired.

As an alternative to the requirements of IWA-4000, PSE&G proposes to use the provisions of ASME Boiler and Pressure Vessel Code Case N-597 for the analytical evaluation of Class 1, 2 and 3 carbon and low-alloy steel piping items subjected to wall thinning as a result of flow accelerated or other corrosion phenomena. ASME approved Code Case N-597 on March 2, 1998. Presently, Code Case N-597 is not contained in the most recent listing of approved Code cases contained in Revision 12 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI, Division 1." However, the NRC has previously approved use of this code to the Millstone Nuclear Power Station, Units 2 and 3 on February 23, 1999.

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PSE&G intends to apply the Code Case N-597 analytical alternative to replacement, if necessary, for the 14" feed water elbows. Presently, all the elbows meet or exceed the minimum wall thickness of the original design requirements; however two of the elbows in the feed water system are expected to reach minimum wall thickness during Cycle 12.

Due to the locations of the elbows and other planned outage activities, replacement of these elbows cannot be accomplished without significantly increasing the scope and duration of the 2R11 refueling outage, which is scheduled to start on October 6, 2000. Therefore, NRC approval of Code Case N-597 will allow the replacement of these elbows to be deferred until the 2R12 refueling outage.

If you have any questions concerning this submittal, do not hesitate to contact Mr. E. H. Villar at 856-339-5456.

Sincerely,

Dave Garchow
Vice President
Technical Support

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