PSEG

Public Service Electric and Gas Company P.O. Box 236 Hancocks Bridge, New Jersey 08038-0236

Nuclear Business Unit

APR 7 2000

LR-N000119

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

Gentlemen:

ADDITIONAL INFORMATION ASSOCIATED WITH CONTAINMENT EXAMINATION RELIEF REQUESTS
HOPE CREEK AND SALEM GENERATING STATION
FACILITY OPERATING LICENSES DPR-70, DPR-75, AND NPF-57
DOCKET NOS. 50-272, 50-311, AND 50-354

This letter provides additional information regarding Public Service Electric and Gas Company's request for relief associated with containment examinations at the Hope Creek and Salem Generating Stations.

Should you have any questions regarding this request, please contact Mr. C. E. Manges, Jr. at 856-339-3234.

Sincerely,

G. Salamon
Manager – Licensing

Attachment

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Attachment to LR-N000119
Additional Information Associated With Containment Inspection Relief Request

Additional information relating to the PSE&G response to an NRC Request for Additional Information (RAI) associated with the PSE&G containment inspection program is provided below. The RAI response was submitted on February 22, 2000. The additional information clarifies RAI Item (1)(D) and revises the response to RAI Item (2) in response to telephone conversations between PSE&G, INEL, and the NRC on March 20, 2000 and March 28, 2000.

RAI Item (1)(D) Clarification

What are PSE&G's initial training and work experience requirements for concrete examination personnel?

PSE&G Response:

An excerpt from PSE&G Procedure SH.MD-AS.ZZ-0001(Q), "Qualification and Certification Program for Nondestructive Examination (NDE) Personnel", is provided below.

Required Minimum Initial Training and Work Experience for VT Containment Method Certification

TRAINING (HOURS)				
Level	II	II	II	II
Technique	VT-1C* (Concrete)	VT-3C* (Concrete)	VT-1M (Metal)	VT-3M (Metal)
Completion with a passing grade of at least 2 years of engineering or science study in a university, college or technical school.	3	3	3	3
High School graduation or equivalent	3	3	3	3
Additional experience (months)	3	3	none	none

Notes:

1. Personnel must be Level II trained and certified VT-1 and/or VT-3/4 accordingly, prior to receiving the appropriate supplementary training for containment examination certification.

Notes: (continued)

2. VT-1C and VT-3C are certifications for concrete visual examination as specified in IWL-2000 ASME Section XI, 1992 Edition and 1992 Addenda.

   * VT-1C visual examinations are conducted to determine concrete containment deterioration and distress for suspect areas detected by VT-3C.

   * VT-3C visual examinations are conducted to determine the structural condition of concrete surfaces of containments by identifying areas of concrete deterioration and distress, such as defined in ACI 201.1 R-69.

   * Prior documented experience in civil/concrete examinations may be substituted for the required experience as approved by the Level III Administrator.

RAI Item (2)

"The 1992 Edition of the Code requires a visual examination (VT-1) of bolting when a connection is disassembled. The 1998 Edition requires a General visual, performed in place, with no requirement for visual examination when the joint is disassembled. It is not clear what, if any examinations will be performed on disassembled bolted connections. If VT-1 will not be performed on this type of connection, please provide an explanation and basis for how this practice provides an acceptable level of quality and safety."

PSE&G Response (Rev. 1):

PSE&G plans to perform a General visual examination of pressure retaining containment bolting during each Inspection Period, in accordance with ASME Section XI 1998/1998 Addenda as follows:

1) The pressure retaining bolting will be examined at least once during each Inspection Period, as scheduled in the ISI Program Long Term Plan, either in-place or removed.
   NOTE: If the bolting is found installed, the bolting will be examined in-place. If the bolting is found removed, the bolting will be examined in the removed condition.
2) If the bolting is found to be outside the General visual acceptance criteria, then a Detailed examination will be performed on the unacceptable bolting.
   NOTE: The unacceptable bolting examined in-place, will then be removed to perform the required Detailed visual examination.
3) Bolted connections will not be disassembled for the sole purpose of performing the General visual examination.

The VT-1 visual examination will be replaced by the General and Detail visual examination, in accordance with ASME Section XI 1998 Edition / 1998 Addenda, Subsection IWE. The VT-1 visual examination requirements were primarily written for the examination of components and items within the reactor coolant pressure boundary. Bolted connections associated with primary containment are not subject to the service conditions (e.g., pressure, temperature, loading, boric acid) as the bolting within the reactor coolant pressure boundary. VT-1 examinations are not required for Class 2 and 3 bolted connections. Bolted connections associated with the primary containment are not subject to conditions that cause accelerated degradation or aging.

Additionally, pressure retaining containment bolted connections that are disassembled and not examined by ASME Section XI, would be examined using PSE&G procedures based on normal maintenance practices (i.e., mechanics working on IWE boundary bolted connections would examine and either reuse or replace the bolting as necessary, using their professional training and the skill of their craft).

Also, when an IWE boundary component is disassembled then reassembled for maintenance activities, an Appendix "J" Local Leak rate test would be performed to determine the leak-tight integrity of the component.

The General visual examination, in conjunction with the existing maintenance practices and the Appendix "J" Local Leak Rate Test, for disassembled bolted connections, provides an acceptable level of quality and safety.