

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

Gentlemen:

# INSERVICE INSPECTION PROGRAM RELIEF REQUEST RR-B6-1 HOPE CREEK AND SALEM GENERATING STATIONS FACILITY OPERATING LICENSES DPR-70, DPR-75, AND NPF-57 DOCKET NOS. 50-354, 50-272, AND 50-311

Pursuant to 10 CFR 50.55a(a)(3)(i), PSEG Nuclear LLC requests a revision to relief request RR-B6, Alternative to Length Sizing Criterion for ASME XI Code Inspections, previously granted by letter dated September 14, 2000. PSEG Nuclear seeks to amend RR-B6 to use the Root Mean Square Error (RMSE) calculations of 3.2(a) and 3.2(b) in lieu of the statistical parameters of 3.2(c).

The attachment to this letter includes the proposed alternative and supporting justification for the relief. Based on the evaluation contained in the attachment, PSEG Nuclear has concluded that the proposed alternative provides an acceptable level of quality and safety. Accordingly, the proposed alternative satisfies the requirements of 10 CFR 50.55a(a)(3)(i).

Similar relief was granted for Millstone Nuclear Power Station Nos. 2 and 3 (TAC Nos. MA9857 and MA9858) in a Nuclear Regulatory Commission (NRC) Safety Evaluation dated January 26, 2001.

PSEG Nuclear requests that the NRC approve this relief request by April 1, 2001 in order to support the Salem Unit 1 outage currently scheduled to begin April 7, 2001.

Should you have any questions regarding this request, please contact Mr. Howard Berrick at 856-339-1862.

Sincerely,

G. Salamon

Manager - Nuclear Safety & Licensing

Attachment: ISI Relief Request No. RR-B6-1

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# PSEG Nuclear LLC HOPE CREEK AND SALEM GENERATING STATIONS ISI RELIEF REQUEST RR-B6-1

### COMPONENT DESCRIPTION:

ASME Section XI, Class 1, Examination category B-A, Item no. B1.10 reactor pressure vessel (RPV) longitudinal and circumferential shell welds and B1.20 RPV head welds subject to Appendix VIII, Supplement 4 examination.

#### ASME CODE CLASS:

**ASME Section XI Class 1** 

#### ASME EXAMINATION REQUIREMENTS:

10CFR50.55a(b)(2) was amended to reference Section XI of the Code through the 1995 Edition with the 1996 Addenda (64 FR 51370). ASME Section XI, 1995 Edition, 1996 Addenda, Appendix VIII, Supplement 4, Subparagraph 3.2(c), requires that the UT performance demonstration results be plotted on a twodimensional plot with the measured depth plotted along the ordinate axis and the true depth plotted along the abscissa axis. For qualification, the plot must satisfy the following statistical parameters: (1) the slope of the linear regression line is not less than 0.7; (2) the mean deviation of flaw depth is less than 0.25 inches; and (3) the correlation coefficient is not less than 0.70.

### **RELIEF REQUESTED:**

Pursuant to 10CFR50.55a(a)(3)(i) relief is requested to use the RMSE calculations of 3.2(a) and 3.2(b) in lieu of the statistical parameters of 3.2(c). These examinations will be performed during the second inspection intervals for PSEG Nuclear Salem Unit Nos. 1 and 2 and Hope Creek.

#### **BASIS FOR RELIEF:**

The NRC granted relief to PSEG Nuclear's request RR-B6 to use a length sizing tolerance of 0.75-inch root mean square error (RMSE) in lieu of the requirements of Subparagraph 3.2(b) to Supplement 4 to Appendix VIII of the Code (ref. 2). Relief request RR-B6, however, failed to request eliminating the use of Supplement 4, Subparagraph 3.2(c) for depth sizing.

In a public meeting on October 11, 2000, the Performance Demonstration Initiative (PDI) identified the discrepancy between Subparagraph 3.2(c) and the PDI program. After review, the NRC has agreed that 10CFR50.55a(b)(2)(xv) (C)(1) should have excluded Subparagraph 3.2(c) as a requirement.

Subsequently, the NRC granted similar relief for Milestone Nuclear Power Station Nos. 2 and 3 (TAC Nos. MA9857 and MA9858) in a Safety Evaluation dated January 26, 2001 (ref. 3).

# PSEG Nuclear LLC HOPE CREEK AND SALEM GENERATING STATIONS ISI RELIEF REQUEST RR-B6-1

### ALTERNATIVE EXAMINATIONS

Pursuant to 10 CFR 50.55a(a)(3)(i), PSEG Nuclear proposes to use the RMS values of 10 CFR 50.55a(b)(2)(xv)(C)(1) which modifies the depth sizing criterion of Appendix VIII, Supplement 4, Subparagraph 3.2(a), in lieu of Subparagraph 3.2(c).

### **REFERENCE:**

- 1. Memorandum from D.G. Naujock to E.J. Sullivan titled, Summary of Public Meeting Held on October 11, 2000, with PDI Representatives," dated November 13, 2000.
- Letter from J. Clifford, NRC NRR to H. Keiser, PSEG Nuclear LLC titled, Hope Creek Generating Station and Salem Generating Station, Units 1 and 2 – Evaluation of Relief Request; Alternative to Length Sizing Criterion on ASME Section XI Code Inspections (TAC Nos. MA9606, MA9607, and MA9718), dated September 14, 2000.
- Letter from J. Clifford, NRC NRR to R. G. Lizotte, Northeast Nuclear Energy Company titled, Millstone Nuclear Power Station, Unit Nos. 2 and 3 – Request for Relief (TAC Nos. MA9857 and MA9858), dated January 26, 2001, Enclosure 1 – Safety Evaluation.