

APR 01 2002



LRN-02-0115

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

Gentlemen:

**INSERVICE INSPECTION PROGRAM
RELIEF REQUEST SH-RR-W01
SALEM GENERATING STATION UNITS 1 AND 2
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSES NPFDP-70, DPR-75 AND NPF-57
DOCKET NOS. 50-272, 50-311 and 50-354**

Pursuant to 10CFR50.55a(a)(3)(i), PSEG Nuclear is submitting Inservice Inspection (ISI) relief request HC-RR-W01 for NRC approval. Relief is requested from the requirements for welding and brazing procedure qualifications as stated in the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, IWA-4000. This request also includes relief for all Procedure Qualification Records (PQR) supporting alternative repair procedures in accordance with ASME, Section XI, IWA-4500.

PSEG Nuclear LLC (PSEG Nuclear) requests to utilize ASME Code Case N-573, *Transfer of Procedure Qualification Records Between Owners, Section XI, Division 1* as an alternative method to qualify welding procedures.

This relief request is intended as an alternate method of qualifying welding procedures at Salem Units 1, Unit 2 and Hope Creek. However, it is desired to use the provisions of this Code Case prior to the October 2002 Salem Unit 1 refueling outage.

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, this proposal satisfies the requirements of 10 CFR 50.55a(a)(3)(i).

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

Sincerely,

A handwritten signature in black ink, appearing to read "G. Salamon", written over the word "Sincerely,".

G. Salamon
Manager – Nuclear Safety and Licensing

Attachment:

1. ISI Relief Request No. SH-RR-W01
2. TABLE 1 – Comparison of ASME Code Case N-573 to PSEG Nuclear Relief Request

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**PSEG NUCLEAR LLC
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Description

Use of ASME Code Case N-573, "Transfer of Procedure Qualification Records Between Owners, Section XI, Division 1.

ASME Section XI Class

ASME Class 1, 2 and 3

Code Requirement

ASME, Section XI, IWA-4440(a), 1995 Edition, 1996 Addenda edition requires that the Owner qualify all welding procedures utilized for ASME XI repair/replacements.

Basis for Relief

Pursuant to 10CFR50.55a(a)(3)(i), relief is requested from the requirements for welding and brazing procedure qualifications as stated in ASME, Section XI, IWA-4440. This request also seeks similar relief for all Procedure Qualification Records (PQRs) that would be required in support of alternative repair procedures in accordance with ASME, Section XI, IWA-4600.

PSEG Nuclear LLC (PSEG Nuclear) requests to utilize ASME Code Case N-573 as an additional alternative method to qualify welding procedures.

Exclusively adhering to the present welding and brazing qualification requirements presents an undue hardship, as considerable utility specific resources are unnecessarily duplicated when qualified procedures from other NRC licensed facilities have already been demonstrated to provide an acceptable level of quality and safety. The requested alternative will not reduce safety or quality but will provide for an alternative means by which to qualify welding procedures.

Similar relief has been granted to a number of utilities, including TXU Electric, Comanche Peak Units 1 and 2 (TAC Nos. MA9406 and MA9407) and Niagara Mohawk Power Corporation Nine Mile Point Nuclear Station (TAC No MA7129).

Alternate Requirements

PSEG Nuclear seeks the approval of Code Case N-573, in order to allow the use of other Owners' PQRs that have been developed and controlled under comparable 10CFR50 Appendix B program controls. Steps to be taken by PSEG Nuclear to ensure the technical correctness of other Owner's PQRs and to ensure the resulting Welding Procedure Specifications (WPS) produce sound welds are presented in Table 1 of this request. In summary, PSEG Nuclear shall:

- a. Verify that the source Owner has certified, by signing the PQR, that testing was performed in accordance with ASME Section IX.

**PSEG NUCLEAR LLC
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- b. Verify that the providing source Owner, (utility) has certified in writing that the procedure qualification was conducted in accordance with a Quality Assurance Program that satisfies the requirements of IWA-1400, (e.g., 10CFR50 Appendix B).
- c. Be responsible for obtaining any additional supporting information needed for WPS development.
- d. Document, on each resulting WPS, the parameters applicable to welding. Each WPS shall be supported by all necessary PQR's.
- e. Accept responsibility for the PQR and document said acceptance by signature approval of each WPS that references the PQR.
- f. Demonstrate technical competence in application of the received PQR by completing a performance qualification test using the parameters of a resulting WPS.
- g. Accept and use a PQR only when it is received directly from the Owner that certified the PQR (source Owner).
- h. Document the use of Code Case N-573 within the repair/replacement plan where the implementing welding procedure(s) have been qualified through this alternative qualification method. This is a departure from the stated conditions within Code Case N-573. This is necessary, however, since ASME NIS-2 forms are not utilized at Salem Unit 1, Salem Unit 2 or Hope Creek. Instead ASME NIS-2A forms are employed in accordance with ASME Code Case N-523, previously approved for use at PSEG Nuclear.

Applicable Time Period

Approval for the use of this alternative, as provided by the Code Case, is requested to support the Salem Unit 1 fall outage in October of 2002, and subsequent Salem Unit 1&2 and Hope Creek outages.

PSEG NUCLEAR LLC
SALEM GENERATING STATION, UNITS 1 and 2 & HOPE CREEK GENERATING STATION
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TABLE 1

Comparison of ASME Code Case N-573 Requirements to PSEG Nuclear Relief Request

Code Case N-573		PSEG Relief Request
It is the opinion of the Committee that as an alternative to the welding and brazing procedure qualification requirements of IWA-4000, a procedure qualification record (PQR) qualified by one Owner may be used by another Owner. When this alternative is used, the following requirements shall be met:		PSEG Nuclear will meet the following requirements in using Code Case N-573:
1	(a) The Owner that performed the procedure qualification test shall certify, by signing the PQR, that testing was performed in accordance with Section IX.	a. PSEG Nuclear shall verify that the source Owner has certified, by signing the PQR, that testing was performed in accordance with Section IX.
2	(b) The Owner that performed the procedure qualification test shall certify, in writing, that the procedure qualification was conducted in accordance with a Quality Assurance Program that satisfies the requirements of IWA-1400.	b. PSEG Nuclear shall verify that the source Owner has certified in writing that the procedure qualification was conducted in accordance with a Quality Assurance Program that satisfies the requirements of IWA-1400.
3	(c) The Owner accepting the completed PQR shall accept responsibility for obtaining any additional supporting information needed for WPS development	c. PSEG Nuclear shall be responsible for obtaining any additional supporting information needed for WPS development.
4	(d) The Owner accepting the completed PQR shall document, on each resulting WPS, the parameters applicable to welding. Each WPS shall be supported by all necessary PQR's.	d. PSEG Nuclear shall document, on each resulting WPS, the parameters applicable to welding. Each WPS shall be supported by all necessary PQR's.
5	(e) The Owner accepting the completed PQR shall accept responsibility for the PQR. Acceptance shall be documented by the Owner's approval of each WPS that references the PQR.	e. PSEG Nuclear shall accept responsibility for the PQR and shall document said acceptance by signature approval of each WPS that references the PQR.
6	(f) The Owner accepting the completed PQR shall demonstrate technical competence in application of the received PQR by completing a performance qualification test using the parameters of a resulting WPS.	f. PSEG Nuclear shall demonstrate technical competence in application of the received PQR by completing a performance qualification test using the parameters of a resulting WPS.
7	(g) The Owner may accept and use a PQR only when it is received directly from the Owner that certified the PQR.	g. PSEG Nuclear shall accept and use a PQR only when it is received directly from the Owner that certified the PQR (source Owner).
8	(h) Use of this Case shall be shown on the <u>NIS-2</u> form documenting welding or brazing.	h. Document the use of Code Case N-573 within the repair/replacement plan where the implementing welding procedure(s) have been qualified through this alternative qualification method.