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United States Nuclear Regulatory Commission
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**CHANGE TO COMMITMENTS REGARDING CABLE RACEWAY FIRE WRAP
RESOLUTION PLAN AND 4160 VOLT SWITCHGEAR ROOM SUPPRESSION
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311**

Ladies and Gentlemen:

On June 6, 1997, PSEG Nuclear submitted letter LR-N97357 entitled, "Cable Raceway Resolution Plan," for Salem Units 1 and 2. In this letter PSEG stated that, "...the overall schedule for resolving the cable fire barrier wrap issue is prior to restart from the third refueling outage after the restart of each Salem Unit." The outages referred to in letter LR-N97357 are the upcoming refueling outages scheduled for this year at Salem Unit 1 and 2 (Unit 1 Refueling Outage 15 in the fall 2002 and Unit 2 Refueling Outage 12 in the spring 2002). As discussed with the NRC in the public meetings held on April 5, 2001 and September 6, 2001, PSEG Nuclear informed the NRC that an alternative approach was being taken to resolve some of the fire barrier wrap issues. This alternative approach requires the installation of system cross-ties between Salem Unit 1 and 2 for the Charging (Chemical and Volume Control) system and the power to the Hot Shutdown panel. These cross-ties require the completion of modifications to both Salem Units 1 and 2 in order for the cross-ties to become functional. As a result of the installation of the cross-ties, resolution of the cable fire barrier wrap issues will not be completed until the final system interconnections are installed in the Salem Unit 1 outage in the fall. Based upon this, PSEG Nuclear is revising our commitment associated with Salem Unit 2 in letter LR-N97357 as follows:

"...the overall schedule for completing plant modifications to resolve the cable fire barrier wrap issue is prior to restart from Salem Unit 1 Refueling Outage 15 in the fall of 2002."

In conjunction with the installation of the cross-ties discussed above, PSEG Nuclear has also reassessed our plans to upgrade the suppression system in the 4160 VAC Switchgear Room as outlined below. In letter LR-N000259, dated July 14, 2000, entitled, "Follow-Up Reply to Notice of Violation Inspection Report

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05000272/1999010 & 05000311/1999010," PSEG informed the NRC staff that an assessment was performed to determine the necessary changes to the fire protection systems in the 4160 VAC Switchgear Rooms to address the overall fire risks of these rooms. As a result of this assessment PSEG had determined that risk reduction could be accomplished through the installation of automatic suppression in this area. Based upon this assessment, PSEG committed to install an automatic water suppression system in the 4160 VAC Switchgear Room by November 2002. Upon completion of a conceptual design for the automatic water suppression system, water drainage from the room became an insuperable design issue.

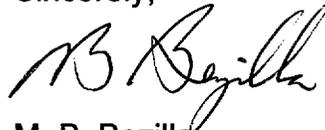
At the time the original risk assessment discussed above was performed, the 4160 VAC Switchgear Room was considered a normal shutdown area in accordance with 10CFR50 Appendix R Section III.G.2. As a III.G.2 area, equipment in this area was relied upon to bring the plant to safe shutdown in the event of fire. Therefore, upgrading the suppression system in the area to automatic would reduce the risk in this area by ensuring that a fire was suppressed prior to damage to required safe shutdown cables and equipment in the area. Using the system cross-ties discussed above, PSEG has re-evaluated the safe shutdown compliance strategy for this area. In the revised safe shutdown strategy, this area will use the system cross-ties to allow equipment from the opposite unit to be used to bring the fire impacted unit to a safe shutdown state. Use of these cross-ties has been determined to be an alternate shutdown strategy in accordance with 10 CFR 50 Appendix R Section III.G.3. In this new safe shutdown strategy, the necessary actions to shutdown the fire affected unit can be performed without reliance on any equipment in that Unit's 4160 VAC Switchgear Room. As a result, upgrading the suppression system in the 4160 VAC Switchgear Room provides very little risk reduction for a fire in the area compared to the new safe shutdown strategy that relies upon equipment outside of the fire area. Maintaining a manual carbon dioxide system in this area will meet the requirements for a fixed suppression system in accordance with 10 CFR 50 Appendix R Section III.G.3.

Based on the above PSEG is no longer pursuing the installation of automatic water suppression in the 4160 VAC switchgear room. The carbon dioxide system in this area will continue to be operated in manual. To address the violation cited in Inspection Report 05000272/1999010 & 05000311/1999010 for the failure of the carbon dioxide system to achieve 50% concentration during initial system testing, PSEG has been pursuing actions to determine the proper discharge time for the room to achieve the 50% concentration requirement.

Modifications will be made to the carbon dioxide system to achieve the proper concentration by the end of November 2002.

If you have any questions regarding this submittal, please contact Brian Thomas at 856-339-2022.

Sincerely,



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