

JUL 12 2002



LRN-02-0255

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

Gentlemen:

**REQUEST FOR ADDITIONAL INFORMATION
INSERVICE INSPECTION PROGRAM RELIEF REQUESTS
S1-RR-B01 AND S1-RR-C01
SALEM GENERATING STATION – UNIT 1
FACILITY OPERATING LICENSE DPR-70
DOCKET NOS. 50-272**

By letter dated January 8, 2002, PSEG Nuclear LLC (PSEG) submitted two requests for relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, for Salem Generating Station, Unit No. 1 (Salem 1). The requests for relief are for the second 10-year inservice inspection (ISI) interval in which Salem adopted the 1983 Edition of ASME Section XI, including Summer 1983 Addenda, as the Code of record.

The Nuclear Regulatory Commission staff discussed the subject relief requests with PSEG staff on May 10, 2002, and requested additional information be provided. Pursuant to that request, PSEG is submitting the enclosed response to the request for additional information as well as revised relief requests.

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".

for G. Salamon
Manager – Nuclear Safety and Licensing

Enclosure

Attachments:

- I. ISI Relief Request S1-RR-B01 (with Table I)
- II. ISI Relief Request S1-RR-C01 (with Table II)
- III. Appendix A

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REQUEST FOR ADDITIONAL INFORMATION
SALEM NUCLEAR GENERATING STATION, UNIT NO. 1

By letter dated January 8, 2002, PSEG Nuclear LLC (PSEG) submitted two requests for relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, for Salem Nuclear Generating Station, Unit No. 1 (Salem 1), The requests for relief are for the second 10-year inservice inspection (ISI) interval in which Salem 1 adopted the 1983 Edition of ASME Section XI, including Summer 1983 Addenda, as the Code of record.

1. PSEG's letter does not identify the start and end dates for the Salem 1 second 10-year ISI interval. Please include this information in your response.

PSEG Response: Salem 1 Second 10-year ISI interval was between February 27, 1988 and May 19, 2001. During this time, Salem 1 was shutdown for an extended period [April 7, 1995 through April 17, 1998, i.e., thirty-six (36) months and ten (10) days]. This information is included in body of relief requests.

2. PSEG submitted relief requests SI-RR-B01 and SI-RR-C01 in accordance with 10CFR50.55a(a)(3)(ii). This section of the regulations addresses licensee alternatives where compliance with Code requirements would result in a hardship or unusual difficulty without a compensating increase in the level of quality or safety. Relief Requests S1-RR-B01 and S1-RR-C01, as contained in the letter and attachments, propose no alternatives. Instead, relief is sought for limited examinations, based on accessibility, physical obstructions or material properties of the subject components. No arguments pertaining to hardship or unusual difficulties, or why completing the limited examinations would not provide a compensating increase in quality or safety, is presented. PSEG should review the basis for these requests, then determine and submit the necessary information for a proposed alternative under 10CFR50.55a(a)(3)(i) or 10CFR50.55a(a)(3)(ii), or submit the relief requests based on impracticality pursuant to 10CFR50.55a(g)(5)(iii) (see below).

The licensee may request relief in accordance with 10 CFR 50.55a(g)(5)(iii), if it can be shown that the Code examinations are impractical at their facility. In this case, the licensee must present adequate information to support a determination that the required examinations are impractical (not simply inconvenient) to perform to the extent required by the Code. This information should include drawings, or other physical descriptions, of the component examination areas, including

examination coverage(s), weld cross-sections, etc., as necessary to support the request. In addition, the licensee should submit arguments) as to why the use of other methods would not reasonably increase the examination coverage(s).

For example, in Attachment I for SI-RR-B01 of the licensee's submittal (table on page 5 of 11), the limitation discussion for upper longitudinal seam weld 1-RPV-1042B states that the reduced volumetric coverage (66%) is "due to outlet nozzle boss interference." This discussion does not provide an adequate description of the physical limitation, or indicate whether or not other techniques such as different interrogation angles could have practically increased the coverage.

Similar issues exist with the remainder of the components listed in this table, as well as in the attached table for S1-RR-C01. Provide a technical basis for each component, detailing the examination limitation, and discuss whether other examinations may be used to increase or supplement the limited examinations.

PSEG Response: Attached Relief Requests SI-RR-B01 and SI-RR-C01 (with charts and drawings) are being re-submitted. Relief is being requested in accordance with 10 CFR 50.55a(g)(5)(iii), based on impracticality to perform to the extent required by the Code.