

LRN-02-0318

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

SEP 10 2002



Gentlemen:

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

By letter dated April 1, 2002, PSEG Nuclear LLC (PSEG) submitted the subject request for relief 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, for Salem Generating Station, Units 1 and 2, and Hope Creek Generating Station. The request also included relief for all Procedure Qualification Records (PQR) supporting alternative procedures in accordance with ASME, Section XI, IWA-4500.

The Nuclear Regulatory Commission staff discussed the subject relief request with PSEG staff by telephone on September 4, 2002, and requested additional clarification on information provided. Pursuant to that request, PSEG is submitting the enclosed response to the request for additional clarification.

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 a horizontal line.

G. Salamon

Manager – Nuclear Safety and Licensing

Enclosure

A047

SEP 10 2002

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ADDITIONAL INFORMATION
SALEM NUCLEAR GENERATING STATIONS, UNITS NO. 1 AND 2
HOPE CREEK GENERATING STATION

By letter dated April 1, 2002, PSEG Nuclear LLC (PSEG) submitted the subject request for relief 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, for Salem Generating Station, Units 1 and 2, and Hope Creek Generating Station. The request also included relief for all Procedure Qualification Records (PQR) supporting alternative procedures in accordance with ASME, Section XI, IWA-4500.

The Nuclear Regulatory Commission staff discussed the subject relief request with PSEG staff by telephone on September 4, 2002. The NRC requested that additional clarification be provided regarding why PSEG Nuclear LLC, in its request for approval to utilize ASME Section XI, Code Case N-573, *Transfer of Procedure Qualification Records Between Owners*, specifically only referenced ASME Section XI, 1995 Edition, 1996 Addenda and articles IWA 4440 and IWA-4600. Pursuant to that request, PSEG is submitting the enclosed response.

PSEG Response: PSEG Nuclear LLC operating licenses include the Salem Unit 1, Salem Unit 2 and Hope Creek plants. For the individual plant's respective Inservice Inspection (ISI) programs, Salem Unit 1 is presently committed to ASME Section XI, 1995 Edition, 1996 Addenda; Salem Unit 2 is committed to ASME Section XI, 1986 Edition; and Hope Creek is committed to ASME Section XI, 1989 Edition.

Unlike the individual ISI programs, the PSEG Nuclear LLC Repair Program, which implements ASME Section XI Repair and Replacement requirements, is applicable to Salem Unit 1, Salem Unit 2, and Hope Creek and is commonly scoped to meet ASME Section XI, 1995 Edition, 1996 Addenda. The Repair Program has been developed in this manner in order to unify and simplify the requirements for the engineering and maintenance organizations that support the day-to-day implementation of the ASME Section XI Repair and Replacement requirements.

The adoption of a later code edition for Repairs and Replacements is authorized in ASME Section XI, Code Case N-389-1, *Alternative Rules for Repairs, Replacements or Modifications*. The code case states, in part, "that editions and addenda of ASME Section XI subsequent to those referenced in the plants In-Service Inspection may be used for repairs, replacements and modifications", provided the subsequent edition and addenda have been accepted by the Regulatory and Jurisdictional authorities having jurisdiction at the plant site. The NRC has accepted Code Case N-389-1 without exception via Regulatory Guide 1.147, *In-Service Inspection Code Case Acceptability, ASME Section XI, Division 1*.

Therefore, PSEG Nuclear LLC was able, within the parameters of both Code Case N-389-1 and Regulatory Guide 1.147, to update the basis for its common Repair Program to a single version of the ASME Section XI Code, which is 1995 Edition, 1996 Addenda.

Since ASME Section XI, Code Case N-573, *Transfer of Procedure Qualification Records Between Owners*, addresses welding related functions which are activities controlled by ASME Section XI, IWA-4000 Repair / Replacement requirements, it is appropriate to cite the single edition and addenda (i.e., 1995 Edition, 1996 Addenda) of ASME Section XI that was referenced in the PSEG Nuclear relief request submittal letter LRN-02-0115, dated April 1, 2002.