

OCT 10 2002
LRN-02-0325



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

Gentlemen:

**REQUEST FOR ADDITIONAL INFORMATION
INSERVICE INSPECTION PROGRAM
RELIEF REQUEST SC-RR-A06
SALEM GENERATING STATIONS - UNIT 1 and 2
FACILITY OPERATING LICENSE DPR-70 and DPR-75
DOCKET NOS. 50-272 and 50-311**

By letter dated July 8, 2002, PSEG Nuclear LLC (PSEG) submitted the subject relief request for Nuclear Regulatory Commission (NRC) approval. The request for relief is for the second 10-year inservice inspection (ISI) interval in which Salem adopted the 1983 Edition of ASME Section X1, including Summer 1983 Addenda, as the Code of record.

The NRC staff discussed the subject relief request with PSEG staff on September 10, 2002. The relief request, SC-RR-A06, was submitted for use of Code Case N-566-2. Although the relief request specifically requested use of Code Case N-566-2, the body of the relief request text refers to Code Case N-566-1. The NRC requested clarification of the Code Case revision being requested.

Pursuant to that request, PSEG is re-submitting the corrected relief request with the body of the relief request text reflecting use of Code Case N-566-2.

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".

G. Salamon
Manager – Nuclear Safety and Licensing

Attachment: ISI Relief Request SC-RR-A06 (corrected)

A047

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Relief Request: SC-RR-A06 (corrected)**Use of Code Case N-566-2**

NRC Approved (Yes or No): _____ Date: _____ Ref: _____

Component Description

Bolted connections for Class 1, 2, & 3 components.

ASME Section XI Class 1, 2, & 3 bolted connections.**Code Requirement**

For Salem, Unit 1, sub-paragraph IWA-5250(a)(2) of the 1995 Edition, including the 1996 Addenda of Section XI requires the removal of the bolt closest to the source of the leakage, performance of VT-3 visual examination of the bolt, and performance of an evaluation in accordance with IWA-3100 when leakage occurs at bolted connections on systems other than gaseous systems.

For Salem, Unit 2, sub-paragraph IWA-5250(a)(2) of the 1986 Edition, without Addenda of Section XI requires the removal of all the bolting, performance of VT-3 visual examination of all the bolting, and performance of an evaluation in accordance with IWA-3100 when leakage occurs at bolted connections.

Basis for Relief

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative provides an acceptable level of quality and safety.

PSEG Nuclear, LLC requests the use of Code Case N-566-2, titled 'Corrective Action for Leakage at Bolted Connections, Section XI, Division 1' for the Third Inspection Interval.

Removal of bolts for VT-3 visual examination is not always the most prudent action when leakage is discovered at a bolted connection. Leakage at bolted connections is typically identified during system leakage tests. For Class 1 systems, this leakage test is conducted prior to plant startup following each refueling outage. This test is performed at full operating pressure (2235 psig) and temperature. When leakage is discovered during this test, the corrective action (i.e. removal of bolts) must be performed with the system at full temperature and pressure, or the plant must be cooled down. The removal of a bolt at full temperature and pressure conditions can be extremely physically demanding due to the adverse heat environment. Cooling down the plant subjects the plant to additional heat up and cool down cycles, and can add 3-4 days to the duration of the refueling outage. Bolted connections associated with pumps and valves are typically studs threaded into the body of the component. Removal of these studs is typically very difficult and time consuming due to length of time they have been installed and are often damaged during the removal process. This difficulty is compounded when the removal must be performed under heat stress conditions.

Relief Request: SC-RR-A06 (corrected)**Use of Code Case N-566-2**

The requirements of IWA-5250(a)(2) must be applied regardless of the significance of the leakage or the corrosion resistance of the materials used in the bolted connection. Implementation of Code Case N-566-2 permits factors such as the number and service age of the bolts, the bolting materials, the corrosiveness of the system fluid, the leakage location and system function, leakage history at the connection or at other system components, and visual evidence of corrosion at the bolted connection be used to evaluate the need for corrective measures.

Alternate Requirements

PSEG Nuclear, LLC proposes to implement the alternative requirements of Code Case N-566-2 when leakage occurs at bolted connections (other than gaseous systems).

Applicability

This Relief Request is applicable to the following:

Salem, Unit 1 - Third Ten-Year Inservice Inspection Interval.

Salem, Unit 2 - Second Ten-Year Inservice Inspection Interval.