



State of New Jersey

Department of Environmental Protection
Division of Environmental Safety, Health,
Analytical Programs
Radiation Protection Programs
Bureau of Nuclear Engineering
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James E. McGreevey
Governor

Bradley M. Campbell
Commissioner

October 9, 2002

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

To Whom It May Concern:

Subject: Salem Generating Station Units -1 and 2
Docket No. 50-272/50-311
Amendment to Facility Operating License
License Change Request S02-04

The subject request was submitted to the NRC in a letter from PSEG dated July 18, 2002. The request proposes to revise the Surveillance Requirements 4.6.2.1.d of the Salem Technical Specifications for the containment spray nozzles. Currently, the containment spray piping and nozzles are inspected every ten years. The license change request proposes to change this requirement to "following activities that could result in nozzle blockage, either evaluate the work performed to determine the impact to the containment spray system, or perform an air or smoke flow test through each spray header and verifying each spray nozzle is unobstructed."

The New Jersey Department of Environmental Protection's Bureau of Nuclear Engineering has reviewed the request in accordance with the requirements of 10 CFR 50.91 (b) and has the following comments for your review and consideration.

We agree that the potential for containment spray piping and nozzle blockage is low but not zero. The containment spray system for pressurized water reactors is much more safety significant than the containment spray system for the boiling water reactor (BWR). Therefore, referencing BWRs as a basis for elimination of this requirement is not appropriate. We recommend that PSEG perform a visual inspection of the Salem containment spray system following activities that could result in nozzle blockage. This is a much more meaningful test. Also, if PSEG applies for life extension for Salem 1 and 2, then we will recommend that the containment spray piping and spray nozzles be visually inspected as part of the life extension approval process. Since it is possible that the nozzles may never be inspected, this seems reasonable. The dose saving justification is not supported by any data. The radiation environment is low on the refueling floor and even lower at

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higher elevations. The real savings comes from the reduced refueling outage time.

If you have any questions, please contact Rich Pinney at (609) 984-7558.

Sincerely,

Dennis J. Zannoni For

Kent W. Tosch, Manager
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