July 24, 2003

MEMORANDUM TO: James W. Clifford, Chief, Section 2

Project Directorate I

Division of Licensing Project Management Office of Nuclear Reactor Regulation

FROM: Robert J. Fretz, Project Manager, Section 2

/RA/

Project Directorate I

Division of Licensing Project Management Office of Nuclear Reactor Regulation

SUBJECT: SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2, FACSIMILE

TRANSMISSION, ISSUES TO BE DISCUSSED IN AN UPCOMING

CONFERENCE CALL (TAC NOS. MB8448 AND MB8449)

The attached information was transmitted by facsimile on July 23, 2003, to PSEG Nuclear LLC (PSEG or the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's submittal dated April 11, 2003, which requested a revision the Salem Nuclear Generating Station, Unit Nos. 1 and 2, Technical Specifications Surveillance Requirements and Bases to eliminate response time testing of certain sensors that are a part of the Engineered Safety Features Actuation System and the Reactor Trip System. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket Nos. 50-272 and 50-311

Attachment: Issues for Discussion in Upcoming Telephone Conference

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REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED CHANGES TO TECHNICAL SPECIFICATIONS FOR

PRESSURE SENSOR RESPONSE TIME TESTING

SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2

By letter dated April 11, 2003, PSEG Nuclear, LLC (PSEG) submitted a request to modify the Salem Nuclear Generating Station (Salem), Unit Nos. 1 and 2, Technical Specifications (TSs) Surveillance Requirements (SRs) and Bases regarding response time testing (RTT) of the Engineered Safety Features Actuation System (ESFAS) and the Reactor Trip System (RTS). The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing your request and has determined that additional information is necessary in order to complete its evaluation.

- In order to verify that the bounding response times for each protective function are properly allocated, and that each sensor is accounted for, please provide a listing of the bounding values for each sensor for all RTS and ESFAS functions where RTT is being eliminated. Additionally, provide the method and analysis used in determining sensor response times. The listing should be in table format, and any of the following tables could serve as a guide:
 - Duke Energy Corporation response to an RAI, Catawba Nuclear Station, Tables 1 and 2 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML020440424)
 - Carolina Power and Light request for license amendment, Shearon Harris Nuclear Power Plant, Enclosure 1, Tables 1 and 2 (ADAMS Accession No. ML022520060)
 - South Carolina Electric and Gas Company request for license amendment,
 Virgil C. Summer Nuclear Station, Attachment 2, Tables on Pages 3 through 7 (ADAMS Accession No. ML003703671)
- 2. The Safety Evaluation (SE) for the topical report requires that utilities perform a RTT on transmitters and switches that use capillary tubes after initial installation, and after any maintenance or modification activity that could damage the capillary tubes. In addition, the SE identifies a concern that the response times for sensors with variable damping could be inadvertently changed during maintenance activities. Therefore, in order for the NRC staff to complete its review, please identify all the sensors for which RTT is to be eliminated that:
 - a. use capillary tubes
 - b. use variable damping.

Also, verify that appropriate plant procedures, and/or administrative controls, will be in place prior to implementation of the proposed TS change to ensure that the damping potentiometer cannot be inadvertently changed. Identify the procedures, and/or administrative controls, as appropriate.

- 3. PSEG states that surveillance testing procedures will be reviewed, and/or revised, to meet action (2) of the alternative approach to drift monitoring for Rosemount transmitters. Please identify and verify that the appropriate surveillance testing procedures will be revised prior to implementation of the proposed TS change.
- 4. "Insert A" of Attachment 2 differs from the wording used in WCAP-13632-P-A, Revision 2. Specifically, the reference to WCAP-13632-P-A, Revision 2, as a methodology "in the overall verification of the channel response time for specific sensors identified in the WCAP" was deleted, and the sentence "[r]esponse time verification for other sensor types must be demonstrated by test" was deleted. In addition, there appears to be a typographical error on line 12 of the insert. WCAP-13632-P-A, Revision 2, is referred to as WCAP-13632-P-A, "Revision 1." Please explain the reasons deviating from the approved text, and provide a correction for the reference to the WCAP.
- 5. The NRC staff has identified the following typographical errors in PSEG's TS Amendment request. Please correct these mistakes:
 - Pages 2 and 3, in Section 4 of Attachment 1: While referring to variable damping, PSEG uses the word dampening. This is done twice in this section.
 - Page 4, line 8, in Section 4 of Attachment 1: The NRC SE on WCAP 13632-P-A, Revision 2, is dated September 5, 1995. PSEG lists this date as September 8, 1995.