

APR 8 2005

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United States Nuclear Regulatory Commission  
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**INSERVICE INSPECTION PROGRAM  
RELIEF REQUEST S2-I3-RR-F01  
SALEM GENERATING STATION UNIT 2  
FACILITY OPERATING LICENSE DPR-75  
DOCKET NOS. 50-311**

Pursuant to 10 CFR 50.55a(a)(3)(i), PSEG Nuclear LLC (PSEG) requests relief from American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, requirements for testing dynamic restraints at Salem Nuclear Generating Station Unit 2. PSEG requests the continued use of Plant Systems Technical Specification (TS) 3/4.7.9, Snubbers, and associated bases, as found within the Salem Nuclear Generating Station Unit 2 TS.

The attachment to this letter includes the proposed alternative and supporting justification for the relief. Based on the evaluation contained in the attachment, PSEG has concluded that the proposed alternative provides an acceptable level of quality and safety. Accordingly, this proposal satisfies the requirements of 10 CFR 50.55a(a)(3)(i).

This relief request is applicable to Salem Generating Station Unit 2. PSEG requests approval by the end of April 2005 in order to support Salem Generating Station Unit 2 refueling outage 2R14 which commenced April 6, 2005. Similar relief was granted for Salem Nuclear Generating Station Unit 1, third 10-year interval (NRC letter dated July 28, 2003, TAC NO. MB6098).

Should you have any questions regarding this request, please contact Mr. Michael Mosier at 856-339-5434.

Sincerely,

A handwritten signature in black ink, appearing to read "Christina L. Perino".

Christina L. Perino  
Director – Regulatory Assurance

Attachment:  
ISI Relief Request S2-I3-RR-F01

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**Relief Request S2-I3-RR-F01**  
**Snubber Testing and Inspection**

**Proposed Alternative In Accordance with 10 CFR 50.55a(a)(3)(i)**  
**-- Alternative Provides Acceptable Level of Quality and Safety --**

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1. ASME Code Component(s) Affected

ASME Section XI, Class 1, 2, 3, MC, CC Component Supports.

2. Applicable Code Edition and Addenda

1998 Edition, including 2000 Addenda

3. Applicable Code Requirement

Paragraphs IWF-5200(a) and IWF-5300(a) require Preservice and Inservice examinations to be performed in accordance with ASME/ANSI OM, Part 4, using the VT-3 visual examination method described in IWA-2213. Additionally, Paragraphs IWF-5200(b) and IWF-5300(b) require Preservice and Inservice tests to be performed in accordance with ASME/ANSI OM, Part 4. Table IWA-1600-1 specifies use of the 1987 Edition, with OMA-1988 Revision of ASME/ANSI OM, Part 4.

The regulation in 10 CFR 50.55a(b)(3)(v) permits the use of Subsection ISTD, titled '*Inservice Testing of Dynamic Restraints (Snubbers) in Light-water Reactor Power Plants*,' ASME OM Code, 1995 Edition up to and including the 1998 Edition with the 2000 Addenda, in lieu of the requirements for snubbers in Section XI, IWF-5200(a) and (b) and IWF-5300(a) and (b), by making appropriate changes to their technical specifications or licensee controlled documents. Preservice and inservice examinations shall be performed using the VT-3 visual examination method described in IWA-2213.

4. Proposed Alternative

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 (PSEG) requests the use of Plant Systems Technical Specification (TS) 3/4.7.9, Snubbers, and associated bases, as found within the Salem Nuclear Generating Station Unit 2 TS.

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5. **Basis of Alternative for Providing Acceptable Level of Quality and Safety**

The Salem Nuclear Generating Station Unit 2 TS contain specifically developed and approved visual examination and functional testing requirements.

Performance of examinations and testing to the requirements of the TS meet the intent of the ASME Code requirements. However, use of the Technical Specification differs in the areas of examination scheduling, re-examinations and functional testing requirements. Visual examination and testing to the more stringent requirements of the TS will continue to result in an increase in the overall level of Plant quality and safety.

These mechanical and hydraulic snubbers were constructed and installed in accordance with the requirements of the Salem UFSAR. Documentation of fabrication and installation examinations is stored at the plant site. Subsequent to the plant going into operation, these snubbers have been and continue to be visually inspected and functionally tested in accordance with Plant TS.

The NRC reviewed several areas of the ASME OM Code, subsection ISTD, to TS Surveillance Requirement (SR) 4.7.9. Table 1 is the comparison performed by the NRC as detailed in the July 28, 2003 Safety Evaluation Report (SER). Based on this the NRC found that the TS 3/4.7.9 provides essentially equivalent visual and functional testing of snubbers when compared to the ASME Code requirements. In addition, the staff found that the qualification and certification program for personnel conducting snubber examinations at Salem (LR-N03-0305, dated July 10, 2003) are equivalent to ASME Code qualification requirements for VT-3 NDE personnel. This same comparison is applicable to this request.

6. **Duration of Proposed Alternative**

This Request, upon approval, will be applicable for the third 10-year interval at Salem Nuclear Generating Station Unit 2 that began on November 23, 2003.

7. **Precedents**

Relief has been previously granted for Salem Unit 1 to perform the examination and testing in accordance with the plant TS (NRC letter dated July, 28, 2003, TAC NO.MB6098).

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Table 1

Criteria	ASME Code Section XI and/or OM Code (Subsection ISTD) Requirements	Salem, Unit Nos. 1 and 2, TS 3/4.7.9 Requirements
Snubber sample size	ISTD 7.6.1 states that each defined test plan group shall use either a 10% sampling plan; or a "37 testing sample plan" during each refueling outage.	At least once per 18 months during shutdown, a representative sample of 10% of the total of each type of snubber in use shall be functionally tested either in place or in a bench test.
Examination requirements	ISTD 6.1 states that snubber visual examinations shall identify physical damage, leakage, corrosion, or degradation. Also, ISTD 7.1 and 7.2 state that operational readiness tests shall verify activation, release rate, and breakaway force or drag force shall be verified by either an in-place or bench test. IWA-2213 also provides requirements for VT-3 examinations of snubbers.	TS 4.7.9.b requires that visual inspections shall verify that there are: (1) no visible indications of damage or impaired operability; (2) attachments to the supporting structure are secure; and (3) where possible, freedom of movement is checked to ensure the snubber is not frozen up. TSs 4.7.9.c, 4.7.9.d, 4.7.9.e requires in-place or bench tests to verify activation, snubber bleed or release rate, and maximum drag force for mechanical snubbers.
Failure evaluation	Snubbers not meeting test requirements shall be evaluated to determine the root cause for the failure in accordance with ISTD 7.7.	TS 4.7.9.c states that if a snubber does not meet functional testing acceptance criteria in TS 4.7.9.d and 4.7.9.e, the cause will be evaluated. If the failure is caused by the manufacturer or design deficiency, all snubbers of the same design, subject to the same defect, shall be functionally tested.

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**Table 1 (cont'd)**

Criteria	ASME Code Section XI and/or OM Code (Subsection ISTD) Requirements	Salem, Unit Nos. 1 and 2, TS 3/4.7.9 Requirements
Additional sampling	Additional snubbers are to be tested based on the number of failures in accordance with ISTD 7.10.	TS 4.7.9.c requires that an additional 10% of the type of snubber that failed functional testing be tested.
Corrective actions	ISTD 7.8 states that unacceptable snubbers shall be adjusted, repaired, modified, or replaced.	TS LCO 3/4.7.9 requires that inoperable snubbers would be adjusted, repaired, modified, or replaced before operability can be restored.
Subsequent examination intervals.	ISTD 6.5.2 provides guidance for examination intervals. Intervals are to be based on Table ISTD 6.5.2-1.	TS Table 4.7-3 provides a snubber visual inspection interval based on the number of unacceptable snubbers discovered. Requirements are similar to Table ISTD 6.5.2-1.
Personnel qualifications	IWA-2310 states that nondestructive examination (NDE) personnel shall be qualified in accordance with ANSI/ASNT CP-189. IWA-2317 provides alternative qualifications for VT-3 examination personnel.	Qualification and certification program for PSEG's NDE personnel satisfies the requirements of ASNT CP-189 (1991 edition) and supplemental requirements of IWA-2300. (REF: PSEG letter dated July 10, 2003 to NRC)