

May 4, 2005

Mr. William Levis
Senior Vice President & Chief Nuclear Officer
PSEG Nuclear LLC - X04
Post Office Box 236
Hancocks Bridge, NJ 08038

SUBJECT: SALEM NUCLEAR GENERATING STATION, UNIT NO. 2, EVALUATION OF
RELIEF REQUEST S2-I3-RR-F01 (TAC NO. MC6668)

Dear Mr. Levis:

By letter dated April 8, 2005, PSEG Nuclear, LLC (PSEG) submitted Relief Request (RR) S2-I3-RR-F01 for the Salem Nuclear Generating Station, Unit No. 2 (Salem 2). The request was submitted pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(a)(3)(i) as a proposed alternative to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code). The submittal proposed the use of the Salem 2 Technical Specification (TS) 3/4.7.9, "Snubbers," in lieu of ASME Code, Section XI requirements outlined in Article IWF-5000. On April 24, 2005, PSEG submitted a revised RR that superseded the April 8, 2005, submittal in its entirety.

The Nuclear Regulatory Commission (NRC) staff has reviewed the request against the requirements of 10 CFR 50.55a as related to the implementation of ASME Code, Section XI. Based on the information provided, the NRC staff concludes that the proposed alternative provides an acceptable level of quality and safety. Hence the proposed alternative for the use of the Salem 2 TS 3/4.7.9 in lieu of ASME Code, Section XI, Article IWF-5000 requirements, is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the Salem 2 third 10-year ISI interval. The NRC staff's review of this RR is documented in the enclosed Safety Evaluation (SE).

The NRC staff notes that your submittal of this RR was not timely in that it was submitted after the Salem 2, 2005 refueling outage had begun and the request was not the result of conditions or issues identified after shutdown. Indeed, the staff notes that a draft version of this relief request was available in October 2004. Late submission of this request required reallocation of NRC staff resources from other ongoing work in order to support the Salem 2 outage schedule. Furthermore, because the submittal was not timely, this RR would not have been a suitable candidate for the NRC staff to provide verbal authorization for its implementation, had PSEG requested such consideration.

W. Levis

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If you have any questions regarding this SE, please contact the Salem Project Manager, Daniel Collins at (301) 415-1427.

Sincerely,

/RA/

Darrell J. Roberts, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-311

Enclosure: As stated

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

THIRD 10-YEAR INSERVICE INSPECTION INTERVAL

RELIEF REQUEST NO. S2-I3-RR-F01 RELATED TO THE

SNUBBER TESTING AND INSPECTION

PSEG NUCLEAR, LLC

SALEM GENERATING STATION, UNIT NO. 2

DOCKET NO. 50-311

1.0 INTRODUCTION

By letter dated April 8, 2005, PSEG Nuclear, LLC (PSEG or the licensee) proposed an alternative (Relief Request (RR) S2-I3-RR-F1) to the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 1998 Edition up to and including the 2000 Addenda, Article IWF-5000, with regard to snubber inservice inspection (ISI) activities at Salem Nuclear Generating Station, Unit 2 (Salem 2). The licensee subsequently revised its request by letter dated April 24, 2005. The April 24, 2005, submittal superceded the April 8, 2005, submittal in its entirety.

ASME Code, Section XI, paragraphs IWF-5200(a), IWF-5300(a), IWF-5200(b) and IWF-5300(b) reference the 1988 Addenda to ASME/ANSI [American National Standards Institute] OM-1987, Part 4 (OMa-1988, Part 4), for snubber visual examination and functional testing. In addition, paragraphs IWF-5200(c) and IWF-5300(c) require that integral and non-integral attachments for snubbers, including lugs, bolting, pins, and clamps, be examined in accordance with the requirements of ASME Code, Section XI, Subsection IWF.

In RR No. S2-I3-RR-F01, PSEG requested that visual examination¹ and functional testing of snubbers be performed utilizing Technical Specification (TS) 3/4.7.9, "Snubbers," and associated bases, in lieu of the ASME Code requirements outlined in Section XI, Article IWF-5000. The alternative was requested for the third 10-year ISI interval for Salem 2.

¹ ASME Code Section XI, Article IWF-5000 provides requirements for "visual examination" and testing of snubbers. Salem 2 TS 3/4.7.9 provides requirements for "visual inspection" and testing of snubbers. For the purposes of this Safety Evaluation (SE), the terms "visual examination" and "visual inspection" are considered to be synonymous.

The Code of Record for Salem 2 for ISI and testing of snubbers is the 1998 Edition up to and including 2000 Addenda of the ASME Code, Section XI, Article IWF-5000.

2.0 REGULATORY EVALUATION

The ISI of ASME Code Class 1, 2, and 3 components must be performed in accordance with Section XI of the ASME Code and applicable edition and addenda as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Nuclear Regulatory Commission (NRC or Commission) pursuant to 10 CFR 50.55a(g)(6)(i) or alternatives have been authorized pursuant to 10 CFR 50.55a(a)(3). Section 50.55a(a)(3) of 10 CFR states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, Director of the Office of Nuclear Reactor Regulation, if the licensee demonstrates that: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that the inservice examination of components and system pressure tests conducted during the first 10-year ISI interval, and subsequent intervals, comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b), 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The applicable edition of Section XI of the ASME Code for the Salem 2 third 10-year ISI interval is the 1998 Edition up to and including the 2000 Addenda.

The NRC's findings with respect to authorizing alternatives and granting or denying the RR are given below.

3.0 TECHNICAL EVALUATION

3.1 Snubber RR S2-I3-RR-F01

3.1.1 Licensee Relief Request

The licensee requested authorization of an alternative to the requirements in the ASME Code, Section XI, paragraphs IWF-5200(a), IWF-5300(a), IWF-5200(b), IWF-5300(b), IWF-5200(c), and IWF-5300(c) for visual examinations and functional testing of ASME Code Class 1, 2 and 3 snubbers at Salem 2.

3.1.2 ASME Code Requirements

ASME Code Section XI, paragraphs IWF-5200(a) and IWF-5300(a) require that snubber preservice and inservice examinations be performed in accordance with ASME/OM, Part 4 (OM-4), using the VT-3 visual examination method described in IWA-2213. Paragraphs

IWF-5200(b) and IWF-5300(b) require that snubber preservice and inservice tests be performed in accordance with OM-4. Paragraphs IWF-5200(c) and IWF-5300(c) require that integral and non-integral attachments for snubbers, including lugs, bolting, pins, and clamps, be examined in accordance with Subsection IWF. The alternative was requested for all Salem 2 safety-related ASME Code Class 1, 2, and 3 snubbers.

3.1.3 Licensee's Proposed Alternative

PSEG proposes to use Salem 2 TS 3/4.7.9, and its associated bases, to perform visual examinations and functional testing on ASME Code Class 1, 2 and 3 snubbers in lieu of meeting the ASME Code, Section XI, Article IWF-5000 requirements.

3.1.4 Licensee's Basis of Requesting Relief (as stated, in part)

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.

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

Performance of [snubber] examinations and testing to the requirements of the TS meet[s] the intent of the ASME Code requirements. However, use of the TS 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 [Updated Final Safety Analysis Report]. 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 [the] Plant TS.

The NRC reviewed several areas of the ASME OM Code, subsection ISTD, to TS Surveillance Requirement (SR) 4.7.9 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) is equivalent to ASME Code qualification requirements for VT-3 NDE [non-destructive examination] personnel. This July 28, 2003 SER [safety evaluation report] is also applicable to this Unit 2 request.

Visual inspections in accordance with TS SR 4.7.9.b shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up.

The applicable visual inspection guidelines do not differentiate between integral and non-integral attachments. This provides an acceptable level of quality and safety.

[Similar] relief has been previously granted for Salem Unit 1 to perform the examination and testing in accordance with the plant TSs ([Reference] NRC letter dated July 28, 2003, TAC NO. MB6098).

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

3.1.5 NRC Staff Evaluation of RR S2-I3-RR-F01

The licensee requested authorization of an alternative to the requirements of the ASME Code, Section XI, paragraphs IWF-5300(a), (b), and (c). The licensee proposed that the visual examinations and functional testing on ASME Code Class 1, 2 and 3 snubbers be performed in accordance with the requirements of Salem 2 TS 3/4.7.9, and its associated bases, in lieu of meeting the requirements in ASME Code, Section XI, paragraphs IWF-5300(a), (b), and (c).

ASME Code Section XI, paragraphs IWF-5200(a) and IWF-5300(a) require that snubber preservice and inservice examinations be performed in accordance with ASME/OM, Part 4 (OM-4), using the VT-3 visual examination method described in IWA-2213. Paragraphs IWF-5200(b) and IWF-5300(b) require that snubber preservice and inservice tests be performed in accordance with OM-4. Paragraphs IWF-5200(c) and IWF-5300(c) require that integral and non-integral attachments for snubbers, including lugs, bolting, pins, and clamps, be examined in accordance with Subsection IWF.

OM-4 specifies the requirements for visual examination (paragraph 2.3), and functional testing (paragraph 3.2) of snubbers. Similarly, Salem 2 TS 3/4.7.9 imposes Surveillance Requirements (SRs) for visual inspection and functional testing of all safety-related snubbers. A visual inspection is the observation of the condition of installed snubbers to identify those that are damaged, degraded, or inoperable as caused by physical means, leakage, corrosion, or environmental exposure. To verify that a snubber can operate within specific performance limits, the licensee performs functional testing that typically involves removing the snubber and testing it on a specially-designed stand or bench. The performance of visual examinations is a separate process that complements the functional testing program and provides additional confidence in snubber operability.

Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," was issued on December 11, 1990. Salem 2 TS 3/4.7.9 incorporates GL 90-09, which has been approved for use by the NRC. GL 90-09 acknowledges that the

visual inspection schedule (as contained in OM-4) is excessively restrictive and that licensees with large snubber populations have expended resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements. GL 90-09 specifically states that its alternate schedule for visual inspection provides the same confidence level as that provided by OM-4.

With regard to the ASME Code Section XI requirement for performance of VT-3 examinations on snubbers and associated attachments, paragraph IWF-5300(a) requires that inservice examinations be performed in accordance with OM-4, using the VT-3 examination method as described in IWA-2213, and paragraph IWF-5300(b) requires that inservice tests be performed in accordance with OM-4. The licensee states that a previously-provided response to an NRC request for additional information related to VT-3 for snubbers at Salem 1, dated July 10, 2003, (Salem Letter No. LR-N03-0305) is also applicable to Salem 2. PSEG states that it performs a VT-3 type visual examination of its snubbers. Salem 2 TS 3/4.7.9 defines inspection requirements, initial sample size, failure evaluation, additional sampling, corrective actions, subsequent inspection intervals, and personnel qualifications that are similar to those provided by OM-4. OM-4 and TS 3/4.7.9 are compared and evaluated in the following table:

Criteria	ASME/ANSI OM Part 4 -1988	Salem, Unit 2, TS 3/4.7.9 Requirements
Examination requirements	Paragraph 2.3.1.1, "Visual Examination," states that snubber visual examinations shall identify impaired functional ability due to physical damage, leakage, corrosion, or degradation. Paragraph 3.2.1.1, Operability Test, states that snubber operational readiness tests shall verify activation, release rate, and breakaway force or drag force 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 foundation or 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, and 4.7.9.e require in-place or bench tests to verify activation, snubber bleed or release rate, and maximum drag force for mechanical snubbers.
Snubber sample size	Paragraph 3.2.3 states that each defined test plan group shall use either a 10% sampling plan; a "37 testing sample plan;" or a "55 testing sample plan" during each refueling outage.	TS 4.7.9.c states that 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.

Criteria	ASME/ANSI OM Part 4 -1988	Salem, Unit 2, TS 3/4.7.9 Requirements
Additional sampling	The snubbers which have been found unacceptable per the testing criteria shall be subject to paragraph 3.2.3.1 (b), which states that the additional sample size must be at least one-half the size of the initial sample size of the “defined test plan group” of snubbers.	TS 4.7.9.c requires an additional 10% of the type of snubber that failed functional testing be tested.
Failure evaluation	Paragraphs 2.3.4.1 and 3.2.4.1 state that snubbers not meeting examination and operability testing acceptance criteria in paragraph 3.2.1, shall be evaluated to determine the cause of the failure in accordance with paragraph 3.2.4.	TS 4.7.9.c states that if a snubber does not meet functional testing acceptance criteria in TSs 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.
Subsequent examination intervals	Paragraph 2.3.2 provides guidance for inservice examination intervals based on the number of unacceptable snubbers discovered.	TS Table 4.7-3 provides a snubber visual inspection interval based on the number of unacceptable snubbers discovered. These requirements are similar to NRC GL 90-09.
Corrective actions	Paragraph 3.2.5.1 states that unacceptable snubbers shall be adjusted, repaired, modified, or replaced.	TS limiting condition for operation 3/4.7.9 requires that inoperable snubbers be adjusted, repaired, modified, or replaced before operability can be restored.
Personnel qualifications for VT-3	IWA-2310 states that NDE personnel shall be qualified in accordance with ANSI/ASNT [American Society for Nondestructive Testing] CP-189. IWA-2317 provides alternative qualifications for VT-3 examination personnel.	PSEG letter dated July 10, 2003, states that its qualification and certification program for NDE personnel satisfies the requirements of ASNT CP-189 (1991 edition) and supplemental requirements of IWA-2300.

Examination Requirements

TS 4.7.9.b states that visual inspections shall verify that: (1) there are 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, and 4.7.9.e require in-place or bench tests to verify activation, snubber bleed or release rate, and maximum drag force for mechanical snubbers. These requirements are similar to snubber visual examination and operability test requirements of OM-4 paragraphs 2.3.1 and 3.2.1. Additionally, in PSEG's letter dated July 10, 2003, the licensee states that its VT-3 type visual examinations include verification of clearances, settings, physical displacement, loose or missing parts, debris, corrosion, wear, erosion, and loss of integrity at bolted or welded connections. The licensee's snubber examinations provided in TS 3/4.7.9 are similar to the VT-3 examination requirements of ASME Code, IWA-2213.

Snubber Sample Size

Salem TS SR 4.7.9 requires that 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, at least once per 18 months, during shutdown. These tests are normally performed during refueling outages. OM-4 requires either a 10% testing sampling plan, a "37 testing sample plan," or a "55 testing sample plan." The Salem TS sample size would, therefore, be comparable to the 10% sample testing requirements of the ASME OM Code. As a result, the number of snubbers tested during the 18-month period is essentially equivalent to the OM-4 requirements.

Additional Sampling

OM-4, paragraph 3.2.3.1(b) states that the additional sample size must be at least one-half the size of the initial sample size of the "defined test plan group" of snubbers. That is, for a 10% sample program, an additional 5% of the same type of snubber in the overall population would need to be tested. If additional snubbers are required to be tested due to the failure of a snubber to meet acceptance criteria, the Salem TSs require that an additional 10% of the type of snubber that had failed be tested. The TS requirements are more conservative than the OM-4 requirements. Therefore, the NRC staff finds the TS additional sampling requirements to be acceptable.

Failure evaluation

OM-4 requires that snubbers not meeting examination and/or operability testing criteria shall be evaluated to determine the cause (paragraphs 2.3.4.1 and 3.2.4.1). The root cause evaluation shall review information related to other unacceptable snubbers and determine whether other snubbers of similar design would require further examination. Salem TS 4.7.9.c states that if a snubber does not meet functional testing acceptance criteria, the cause will be evaluated. Therefore, the NRC staff considers Salem's TS requirements to be equivalent to the OM-4 requirements.

Subsequent Examination Intervals

OM-4, paragraph 2.3.2 provides guidance for examination intervals. This paragraph provides a table based on the number of unacceptable snubbers. TS Table 4.7-3 provides a snubber visual inspection interval based on the number of unacceptable snubbers discovered. TS Table 4.7-3 is similar to the guidance contained in NRC GL 90-09, which has been approved for use by the NRC. The Salem 2, TS 3/4.7.9 has been approved for use by the NRC via Amendment No. 142, dated December 12, 1994. Therefore, the NRC staff finds examination intervals contained in TS 3/4.7.9 acceptable.

Corrective Actions

OM-4, paragraph 3.2.5.1.8 states that unacceptable snubbers shall be adjusted, repaired, modified, or replaced. Salem TS 3/4.7.9 requires that inoperable snubbers be similarly adjusted, repaired, modified, or replaced prior to restoring system operability. Therefore, the NRC staff considers the TS corrective actions associated with the discovery of unacceptable snubbers at Salem 2 to be equivalent to the OM-4 requirements.

Personnel Qualifications

In its letter dated July 10, 2003, PSEG stated that NDE personnel assigned to conduct snubber visual examinations are, at a minimum, certified Level I, VT 1-3 in accordance with the licensee's qualification and certification program for NDE personnel. PSEG further stated its NDE qualification and certification program satisfies the requirements of: (1) American Society for Nondestructive Testing (ASNT) Recommended Practice No. SNT-TC-1A (1980, 1984, and 1992 Edition), "Personnel Qualification and Certification in Nondestructive Testing;" (2) ASNT CP-189 -1991, "ASNT Standard for Qualification and Certification of Nondestructive Testing Personnel;" and (3) supplemental requirements of the ASME Code, Section XI (1995 Edition, 1996 Addenda), Subsection IWA-2300. The qualification and certification program for personnel conducting snubber examinations at Salem 2 is equivalent to the minimum ASME Code qualification requirements for VT-3 NDE personnel. Therefore, the NRC staff finds the licensee's qualification program acceptable.

ASME Code Section XI, IWF-5300(c) requires that integral and non-integral attachments be examined. TS 3/4.7.9 makes no distinction between integral and non-integral attachments. Both integral and non-integral attachments are included in the inspection to verify overall structural integrity. The licensee stated that visual inspections performed in accordance with TS 4.7.9.b verify that: (1) there are no visible indications of damage or impaired operability, and (2) attachments to the foundation or supporting structure are secure. The staff considers that the above TS 3/4.7.9 visual inspections include inspections of the integral and non-integral attachments and, hence, provide an equivalent examination to that required by IWF-5300(c). Therefore, use of the TS 3/4.7.9 inspection requirements, in lieu of the IWF-5300(c) requirements, is acceptable.

Based on the discussion above, the NRC staff finds that snubber visual inspections and functional testing, conducted in accordance with TS 3/4.7.9, provide reasonable assurance of snubber operability and provide a level of quality and safety equivalent to that of the ASME Code, Section XI. Therefore, the staff finds the licensee's proposed alternative provides an

acceptable level of quality and safety with respect to snubber inspection and functional testing. Thus, TS 3/4.7.9 may be used in lieu of ASME Code, Section XI requirements for performing inservice examination and testing of snubbers as authorized.

4.0 CONCLUSION

Based on the information provided, the staff concludes that the proposed alternative to use TS 3/4.7.9 for snubber visual inspection and functional testing provides an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the licensee's proposed alternative is authorized for the Salem 2 third 10-year ISI interval.

5.0 REFERENCES

U.S. Code of Federal Regulations, Domestic Licensing of Production and Utilization Facilities, Part 50, Chapter I, Title 10, "Energy," Section 50.55a, Codes and standards.

Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990.

American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components.

American Society of Mechanical Engineers Operation and Maintenance Code, Inservice Testing of Nuclear Power Plant Components.

Letter from G. Salamon, of PSEG Nuclear, LLC to NRC "Inservice Inspection Program Third Interval Relief Request Submittals Salem Generating Station Unit 1 and 2 Facility Operating License DPR-70 and DPR-75, Docket Nos. 50-272 and 50-311" dated July 8, 2002.

Letter from G. Salamon, of PSEG Nuclear, LLC to NRC "Request for Additional Information Inservice Inspection Program Relief Request S1-RR-F1, Salem Generating Station-Unit 1 Facility Operating License DPR-70, Docket No. 50-272" dated July 10, 2003.

Letter from Christina L. Perino, of PSEG Nuclear, LLC to NRC "Inservice Inspection Program Relief Request S2-I3-RR-F01, Salem Generating Station Unit 2 Facility Operating License DPR-75, Docket No. 50-311" dated April 8, 2005.

Letter from Christina L. Perino, of PSEG Nuclear, LLC to NRC "Inservice Inspection Program Revised Relief Request S2-I3-RR-F01, Salem Generating Station Unit 2 Facility Operating License DPR-75, Docket No. 50-311" dated April 24, 2005.

Principal Contributor: G. Bedi

Date: May 4, 2005