State of New Jersey

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December 9, 2005

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

Dear Sir:

Subject: Salem Generating Station Units 1 and 2
Docket Nos. 50-272 and 50-311
License Change Request S05-08
Containment Isolation Valves

PSEG Nuclear LLC submitted the proposed change to the Salem Technical Specifications by letter to the NRC dated September 26, 2005. The proposed amendment would eliminate the Surveillance Requirement for containment isolation valves that are being returned to service after maintenance, repair or replacement as allowed by Section 4.4.2 of NUREG-1482, Revision 1.

The BNE is opposed to the elimination of this surveillance requirement. Since NUREG-1482, Revision 1, allows for this surveillance to be eliminated only if certain conditions are met, we recommend that the surveillance requirement be revised as follows:

> Each containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by performance of a cycling test and verification of isolation time, unless the conditions of Section 4.4.2 of NUREG-1482, Revision 1, are met.

If you need to discuss this subject further, please contact Elliot Rosenfeld at (609) 984-7548.

Sincerely,

Kent W. Tosch, Acting Assistant Director
Radiation Protection and Release Prevention Element

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