PSEG Nuclear LLC
P.O. Box 236,, Hancocks Bridge, NJ 08038-0236

PSEG
Nuclear L.L.C.

APR 10 2008

10 CFR 50.54(f)

LR-N08-0074

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Salem Nuclear Generating Station, Units 1 and 2
Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

Subject: Three-Month Response to NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems"

Reference: NRC Generic Letter 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" dated January 11, 2008.

The U. S. Nuclear Regulatory Commission (NRC) issued NRC Generic Letter (GL) 2008-01 (Reference) to request that each licensee evaluate its Emergency Core Cooling System (ECCS), Decay Heat Removal (DHR) (Residual Heat Removal (RHR)) System, and Containment Spray (CS) System licensing basis, design, testing, and corrective actions to ensure that gas accumulation is maintained less than the amount that challenges operability of these systems, and that appropriate action is taken when conditions adverse to quality are identified.

The NRC, in GL 2008-01, requested each licensee to submit a written response in accordance with 10 CFR 50.54(f) within nine months of the date of the GL to provide the following information:

> "(a) A description of the results of evaluations that were performed pursuant to the requested actions of the GL. This description should provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems of the GL;
>
> (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,

A134
NRR

(c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule."

Additionally, the NRC requested that if a licensee cannot meet the requested response date, the licensee "shall provide a response within three months of the date of this GL". In the three-month response, the licensee was requested to describe the alternative course of action that it proposes to take, including the basis for the acceptability of the proposed alternative course of action.

PSEG Nuclear does not expect to complete the requested actions at Salem Nuclear Generating Station Units 1 and 2 prior to the nine-month schedule, and, therefore, is providing the attached three-month response to document the planned actions and associated schedule.

This letter contains the following new commitments, which are entered into the Commitment Management Database under SAP order 70079735:

1. Complete the detailed walkdowns of inaccessible sections of GL 2008-01 subject systems prior to startup from the next refueling outages 1R19 and 2R17 (0050, 0070).

2. Evaluations of GL 2008-01 subject systems complete within 90 days following the completion of the next refueling outages 1R19 and 2R17 (0060, 0080).

If there are any questions regarding this response, please contact Lee Marabella at (856) 339-1208.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/10/08

Sincerely,

Robert C. Braun
Site Vice President - Salem

Attachments: 1. Salem Nuclear Generating Station Units 1 And 2 Three Month Response to NRC Generic Letter 2008-01

2. List Of Commitments

C Mr. S. Collins, Administrator - Region I
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

U. S. Nuclear Regulatory Commission
Mr. R. Ennis, Project Manager – Salem Unit 1 and Unit 2
Mail Stop 08C2
Washington, DC 20555-0001

USNRC Senior Resident Inspector – Salem Generating Station

Mr. P. Mulligan, Manager IV
Bureau of Nuclear Engineering
P. O. Box 415
Trenton, NJ 08625

Attachment 1
SALEM GENERATING STATION UNITS 1 AND 2 THREE MONTH RESPONSE TO NRC GENERIC LETTER 2008-01

This response to Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems," addresses the Salem Generating Station Units 1 and 2 three-month response requested in NRC GL 2008-01, which was dated January 11, 2008. This response discusses:

1. the required evaluations that will not be complete by October 11, 2008 (nine months from the date of GL 2008-01),
2. the alternative course of action planned, and
3. the basis for the acceptability of the alternative course of action.

Scope of Effort

The scope of evaluations required to support the response to Generic Letter 2008-01 include the following systems:

- Residual Heat Removal System (Low Head Safety Injection and Shutdown Cooling portion)
- Chemical Volume Control System (High Head Safety Injection portion)
- Safety Injection System (Intermediate Head Safety Injection)
- Containment Spray System

The evaluations will include the review of the four principle areas addressed in the GL 2008-01: Licensing Basis; Design; Testing and Corrective Actions. Actions that will be taken include performance of a thorough review of licensing bases, plant and programmatic procedures, technical specifications, design drawings and our Corrective Action Program database. Walkdowns will be performed for piping systems to confirm items such as adequate vent capability for system high points and verification of design drawings. Previous drawing reviews and design basis verifications will be used as part of this process.

The evaluations of these systems will be performed as requested in GL 2008-01, however, not all evaluations will be completed within the schedule provided for in the generic letter.

Evaluations that will not be complete by October 11, 2008

The requested information in GL 2008-01 includes "A description of the results of evaluations that were performed....". The evaluations performed are those required to ensure that gas accumulations are maintained less than the amount that challenges operability of these systems. It will not be possible to perform the walkdowns on portions of these systems before October 11, 2008 because of the need for a refueling outage to perform the walkdowns.

Therefore, due to the inability to finish the walkdowns, the requested evaluations for these systems will not be complete by October 11, 2008. The requirement for performance of the inspections during a refueling outage is based on the following:

- The walkdowns of these systems require entry into areas of high radiation (such as inside the bioshield wall) during power operations.

- Restrictions on removal of insulation, if required, from piping during power operations prevent removal of sections of insulation from piping needed to perform proper evaluations of the piping systems.

- Erection of scaffolding may be prohibitive during power operations for locations over safety related equipment or if high radiation levels exist in the area of concern precluding scaffolding installation.

Alternative Course of Actions Planned

Salem Unit 1

For Salem Unit 1 the next available refueling outage, 1R19, is currently scheduled to commence in October 2008. PSEG Nuclear will perform walkdowns during this outage of those areas only accessible during an outage and evaluate the findings upon completion. All other system walkdowns will be performed during the nine-month timeframe as prescribed by GL 2008-01.

Salem Unit 2

For Salem Unit 2, refueling outage 2R16 is currently in progress (March - May, 2008) and the next refueling outage 2R17 is scheduled to begin in October, 2009. During the present refueling outage, walkdowns are being performed to the extent possible. Since this is an emergent issue, it was not feasible to complete all required walkdowns. There was insufficient lead-time to perform the proper pre-planning prior to the outage. Therefore, Unit 2 additional system walkdowns of those areas only accessible during an outage will be completed during 2R17 (October, 2009) and the findings evaluated upon completion. All other system walkdowns will be performed during the nine-month timeframe as prescribed by GL 2008-01.

Acceptability of Alternative Course of Action:

The alternative course of action is acceptable based on the operational experience and previous actions taken to resolve identified issues.

- Previous surveillance testing performed on GL2008-01 subject systems and interviews with operations personnel have confirmed that there are currently no gas voiding issues with either of the Salem Units.
- Pre-existing operating procedures include monthly venting of the GL2008-01 subject systems to ensure systems are maintained sufficiently filled. No current issues have been identified in the performance of these procedures.
- In-service testing of the GL2008-01 subject systems is routinely performed and no known issues impacting pump operability have been identified during this testing.
- Salem Generating Station has improved venting procedures and added vent valves to ensure adequate system venting and filling as part of corrective actions for previous gas accumulation issues.

PSEG Nuclear has confidence that the GL2008-01 subject systems can perform their required design functions based on the above described operating experience, surveillance and performance testing and past corrective actions that have been performed to manage gas intrusion issues at Salem Generating Station Units 1 and 2.

For these reasons, PSEG Nuclear concludes that completing performance of detailed walkdowns on portions of subject piping systems that require refueling outages and subsequent evaluations outside the requested nine-month period is an acceptable alternative course of action for Salem Generating Station Units 1 and 2.

Attachment 2
Document Control Desk
LR-N08-0074

List of Commitments
Salem Generating Station Units 1 and 2

The following table identifies those actions committed to by PSEG. Any other statements in this letter are provided for information purposes and are not considered regulatory commitments.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM-MATIC (YES/NO)
Unit 1: Complete the detailed walkdowns of inaccessible sections of GL 2008-01 subject systems prior to startup from the next refueling outage. (70079735 – 0050)	End of 1R19	Yes	No
Unit 1: Evaluations of GL 2008-01 subject systems complete within 90 days following the completion of the next refueling outage. (70079735 – 0060)	End of 1R19 + 90 days	Yes	No
Unit 2: Complete the detailed walkdowns of inaccessible sections of GL 2008-01 subject systems prior to startup from the next refueling outage. (70079735 – 0070)	End of 2R17	Yes	No
Unit 2: Evaluations of GL 2008-01 subject systems complete within 90 days following the completion of the next refueling outage. (70079735 – 0080)	End of 2R17 + 90 days	Yes	No