



OCT 12 2010

10 CFR 50.55a

LR-N10-0361

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: Request for Relief from ASME Code Pressure Test for Service Water Supply
Buried Piping

In accordance with 10 CFR 50.55a(a)(3), "Codes and standards," PSEG Nuclear LLC (PSEG), hereby requests NRC approval of proposed Relief Requests S1-I4R-102 and S2-I3R-104 for Salem Units 1 and 2, respectively. The proposed reliefs will allow Salem to use an alternative examination for buried components in the Nuclear Service Water System at Salem Nuclear Station in lieu of system pressure tests as required by ASME Section XI, IWA-5244(b).

For Unit 1, PSEG requests approval of the proposed request by October 30, 2011 to align with first scheduled Unit 1 refueling outage in the 4th Inservice Inspection Interval. Relief Request S1-I4R-102 applies to the fourth 10-year Inservice Inspection (ISI) Interval, which begins on May 20, 2011. The Code of Record for the fourth ISI interval will be American Society of Mechanical Engineers (ASME) Code, Section XI, 2004 Edition.

For Unit 2, PSEG requests approval of the proposed request by October 30, 2011 to support inspections scheduled during the second outage of the 3rd period in the 3rd ISI Interval. Relief Request S2-I3R-104 applies to the third 10-year Inservice Inspection (ISI) Interval, which began on November 27, 2003. The Code of Record for the Unit 2 third ISI interval is ASME Code, Section XI, 1998 Edition 2000 Addenda

The proposed relief requests are provided in Attachments 1 and 2 to this letter.


There are no commitments contained in this letter.

A047
LIRR

OCT 12 2010

If you have any questions or require additional information, please contact Mrs. Erin West of my staff at 856-339-5411.

Sincerely,



Jeffrey J. Keenan
Manager - Licensing
PSEG Nuclear LLC

Attachment:

1. Relief Request S1-I4R-102
2. Relief Request S2-I3R-104
3. ASME Code Interpretation XI-1-07-28
4. ASME Code Interpretation XI-1-07-37
5. PSEG drawing 219563

cc: William Dean, Regional Administrator - NRC Region I
R. Ennis, Project Manager - USNRC
NRC Senior Resident Inspector Salem
P. Mulligan, Manager IV, NJBNE
H. Berrick - Salem Commitment Tracking Coordinator
L. Marabella - Corporate Commitment Tracking Coordinator

ATTACHMENT 1

Salem Nuclear Generating Station, Unit 1
Facility Operating License No. DPR-70
NRC Docket No. 50-272

Relief Request – S1-I4R-102

Proposed Alternative in Accordance with 10 CFR 50.55a(a)(3)(ii)
Hardship or Unusual Difficulty without Compensating
Increase in Level of Quality or Safety

1. ASME Code Component(s) Affected

Code Class:	3
Examination Category:	D-B
Item Number:	D2.10
Description:	Buried portions of the 11 & 12 Nuclear Service Water (SW) Supply Headers
Unit/Inspection:	Salem Unit 1 / fourth (4 th) 10-Year Interval

2. Applicable Code Edition and Addenda

American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection and Testing of Components of Light-Water Cooled Plants," 2004 Edition. The fourth interval will begin on May 20, 2011 and will end on May 20, 2021.

3. Applicable Code Requirement

ASME Section XI IWD-2500 Table IWB-2500-1, Inspection Program B, requires system leakage test of pressure retaining boundary of Class 3 components once each period of the ISI ten-year interval. The system pressure tests and visual examinations shall be conducted in accordance with IWA-5000. A portion of the Service Water Supply Piping is buried and IWA-5244 applies.

ASME Section XI IWA-5244, Buried Component, states:

- (b) For buried components where a VT-2 visual examination cannot be performed, the examination requirement is satisfied by the following:
- (1) The system pressure test for buried components that are isolable by means of valves shall consist of a test that determines that rate of pressure loss. Alternatively, the test may determine the change in flow between the ends of the buried components. The acceptable rate of pressure loss or flow shall be established by the owner.
 - (2) The system pressure test for nonisolable buried components shall consist of a test to confirm that flow during operation is not impaired.

Salem Unit 1 Inservice Inspection Program
Relief Request S1-I4R-102
10 CFR 50.55a

4. Reason for Request

The requirements of IWA-5244 have been the subject of a number of relief requests, as cited in Section 7.0 and NRC violations as cited in Section 8.0 of this request. The alternative proposed in this request will eliminate the risk of misinterpreting (or misapplying) the requirements of either IWA-5244(b)(1) or IWA-5244(b)(2), and will eliminate or minimize the risk of receiving additional NRC violations for non-compliance with the ASME Code, Section XI.

In order to perform the pressure testing necessary to meet the requirements of IWA-5244 (b)(1), the butterfly valves which isolate 11 and 12 SW Nuclear Headers would need to be removed from the system and blind flanges installed to allow system isolation for pressure testing. The affected valves for 11 SW are 12SW20, 11SW21, 11SW22 and 11SW416 and for 12 SW the affected valves are 14SW20, 12SW21, 12SW22 and 12SW416. The cost and potential outage impact would result in hardship or unusual difficulty without compensating increase in level of quality or safety.

The following additional information is provided in support of this request:

1. Salem Generating Station, Unit 1 recently received a violation for the failure to perform auxiliary feedwater (AFW) discharge piping system pressure tests on buried piping components in accordance with the ASME Code, Section XI, IWA-5244. This NRC violation supports the need to seek relief from the requirement of IWA-5244(b)(1) of the 2004 Edition.
2. ASME has issued the following interpretations pertaining to IWA-5244:
 - a. On November 21, 2007, ASME issued interpretation XI-1-07-28 that clarified examination requirements specified in IWA-5244(b)(2). The ASME interpretation is included as Attachment 3 to this request. Using this interpretation would require a licensee to comply with IWA-5244(b)(2) when testing buried components with valves that are not capable of isolating the portion of the component under test. The test required by IWA-5244(b)(2) is a test to confirm that flow during operation is not impaired.
 - b. On October 14, 2008, ASME issued interpretation XI-1-07-37 pertaining to the intent of IWA-5244(b)(1) as it applies to buried components with butterfly valves that are not designed to be leak-tight. This interpretation is included as Attachment 4 to this request. It supports the position that buried components with butterfly valves that are not leak-tight should receive an unimpaired flow test.

Salem Unit 1 Inservice Inspection Program
Relief Request S1-I4R-102
10 CFR 50.55a

5. Proposed Alternative and Basis for Use

The proposed alternative for testing the buried portion of Service Water piping in lieu of performing the periodic test required by IWA-5244(b)(1) shall consist of:

- (1) A visual examination of the ground surface areas (includes surfaces of asphalt or other pavement materials) above all SW piping buried in soil shall be performed during all current and subsequent inspection outages to detect evidence of through-wall leakage in the buried components. The system shall have been in operation at nominal operating conditions for at least 24 hours prior to performing the visual examinations, in lieu of performing the periodic test required by IWA-5244(b)(1). The ASME Section XI code only requires a pressure test once each period. Since the SW system is in-service for extended periods of time, any leakage would be readily identified by plant personnel performing routine inspections during rounds.
- (2) Visual examination of the inside surface of all SW buried piping are performed to ensure that piping is unobstructed and any evidence of piping degradation is identified and is evaluated or repaired.

The basis for the proposed alternative is as follows:

The requirements of IWA-5244 (b)(1) to perform a pressure drop test cannot be performed. The valves installed in the SW system that would isolate the piping for drop testing are butterfly valves and are not capable of the leak tightness required to perform a pressure drop test. There are no locations available for installation of flow measuring devices in the SW system near the buried portions that would be capable of measuring flow with sensitivity adequate for comparing flow at inlet and outlet of headers.

Industry experience indicates that neither the change in flow test IWA-5244(b)(1) nor the unimpaired flow test IWA-5244(b)(2) are sufficiently sensitive to detect small through-wall leakage in these buried components. This is due to relatively high system flow rates and accuracy of flow measurement instrumentation. As such, there is no appreciable difference between the level of quality and safety achieved by performing either of these tests.

Visual examinations of ground surface areas are capable of detecting potentially small through-wall leakage in the buried component. These visual examinations and visual examination of piping inside diameter provide reasonable assurance of the structural and leak-tight integrity of the buried components.

The SW Nuclear Headers are inspected under the GL 89-13 program, where valves are opened and/or removed and visual inspection and repairs are performed on entire buried SW Nuclear Header piping sections.

Inspection frequency information for these inspections is contained in Table 1.

Salem Unit 1 Inservice Inspection Program
Relief Request S1-I4R-102
10 CFR 50.55a

Table 1: Current Inspection frequency for Service Water

Inspection Frequency	Last Inspection	Scope/actions	Next Inspection
36 Month (2RFO)	1R20 (S2010)	11 SW header: crawl through inspection performed; inspection performed using remote video inspection system	1R22 (S2013)
36 Month (2RFO)	1R19 (F2008)	12 SW header, crawl through inspection performed; inspection performed using remote video inspection system	1R21 (F2011)

Most recent visual internal inspections on the buried portions of the 11 and 12 nuclear headers indicate that the piping is maintained in good condition and is unobstructed. The inspections cover approximately 300 feet for each header and spans from the service water intake structure to the auxiliary building. The buried piping is prestressed concrete cylinder piping with rubber and steel joints (reference PSEG drawing 219563, Attachment 5)

Pursuant to 10CFR50.55a(a)(3)(ii), relief is requested because performing the tests on the Nuclear Service Water system at Salem in accordance with the code would result in hardship or unusual difficulty without compensating increase in level of quality or safety on the basis.

6. Duration of Proposed Alternative

The proposed alternative will be used for the fourth ten-year interval of the Inservice Inspection Program for Salem Unit 1, which begins May 20, 2011 and is currently scheduled to end on May 20, 2021.

7. Precedents

Relief from the requirements of IWA-5244 (for various ASME Code Editions/Addenda) has been granted to other licensees, as documented in the following relief requests:

- 7.1. Millstone Power Station, Units 2 and 3, Relief Request IR-2-40, RR-89-57, and IR-2-41, Approved July 10, 2008, TAC Nos. MD7732 and MD7733.

Salem Unit 1 Inservice Inspection Program
Relief Request S1-I4R-102
10 CFR 50.55a

- 7.2. Vermont Yankee Nuclear Power Station, Relief Request ISI-PT-01, Approved January 31, 2008, TAC No. MD5436.
- 7.3. Duane Arnold Energy Center, Relief Request NDE-R007, Approved June 12, 2007, TAC No. MD2523.
- 7.4. Prairie Island Nuclear Generating Plant, Units 1 and 2, Relief Request Nos. 1-RR-4-7 and 2-RR-4-7, Approved October 31, 2007, TAC Nos. MD3809 and MD3810.
- 7.5. Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2, Relief Requests I3R-07 and I2R-46, Approved January 16, 2007, TAC Nos. MD1757, MD1758, MD1759, and MD1760.
- 7.6. Cooper Nuclear Station, Relief Request PR-06, Approved October 2, 2006, TAC No. MD0286.
- 7.7. Brunswick Steam Plant, Relief Request RR-11 SER, Dated February 17, 2000, TAC Nos. MA2108 and MS2109.

8. **Reference**

- 8.1. ASME Boiler and Pressure Vessel Code, Section XI, Interpretations, Volume 58, XI-1-07-28, issued November 21, 2007. [Attachment 3]
- 8.2. ASME Boiler and Pressure Vessel Code, Section XI, Interpretations, Volume 59, XI-1-07-37, issued October 14, 2008. [Attachment 4]
- 8.3. Salem Nuclear Generating Station – NRC Integrated Inspection Report 05000272/2010003 and 05000311/2010003, dated August 10, 2010.

ATTACHMENT 2

Salem Nuclear Generating Station, Unit 2
Facility Operating License No. DPR-75
NRC Docket No. 50-311

Relief Request – S2-I3R-104

Proposed Alternative in Accordance with 10 CFR 50.55a(a)(3)(ii)
Hardship or Unusual Difficulty without Compensating
Increase in Level of Quality or Safety

1. **ASME Code Component(s) Affected**

Code Class:	3
Examination Category:	D-B
Item Number:	D2.10
Description:	Buried portions of the 21 & 22 Nuclear Service Water (SW) Headers
Unit/Inspection:	Salem Unit 2 / third (3 rd) 10-Year Interval

2. **Applicable Code Edition and Addenda**

American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection and Testing of Components of Light-Water Cooled Plants," 1998 Edition 2000 Addenda. The third interval began on November 27, 2003 and is scheduled to end on November 27, 2013.

3. **Applicable Code Requirement**

ASME Section XI IWD-2500 Table IWB-2500-1, Inspection Program B, requires system leakage test of pressure retaining boundary of Class 3 components once each period of the ISI ten-year interval. The system pressure tests and visual examinations shall be conducted in accordance with IWA-5000. A portion of the Service Water Supply Piping is buried and IWA-5244 applies.

ASME Section XI IWA-5244, Buried Component, states:

- (b) For buried components where a VT-2 visual examination cannot be performed, the examination requirement is satisfied by the following:
- (1) The system pressure test for buried components that are isolable by means of valves shall consist of a test that determines that rate of pressure loss. Alternatively, the test may determine the change in flow between the ends of the buried components. The acceptable rate of pressure loss or flow shall be established by the Owner.
 - (2) The system pressure test for nonisolable buried components shall consist of a test to confirm that flow during operation is not impaired.

Salem Unit 2 Inservice Inspection Program
Relief Request S2-I4R-104
10 CFR 50.55a

4. Reason for Request

The requirements of IWA-5244 have been the subject of a number of relief requests, as cited in Section 7.0 and NRC violations as cited in Section 8.0 of this request. The alternative proposed in this request will eliminate the risk of misinterpreting (or misapplying) the requirements of either IWA-5244(b)(1) or IWA-5244(b)(2), and will eliminate or minimize the risk of receiving additional NRC violations for non-compliance with the ASME Code, Section XI.

In order to perform the pressure testing necessary to meet the requirements of IWA-5244 (b)(1), the butterfly valves which isolate 21 and 22 Service Water Nuclear Headers would need to be removed from the system and blind flanges installed to allow system isolation for pressure testing. The affected 21 SW valves are 22SW20, 21SW21, 21SW22 and 21SW416 and the affected 22 SW valves are 24SW20, 22SW21, 22SW22 and 22SW416. The cost and potential outage impact would result in hardship or unusual difficulty without compensating increase in level of quality or safety.

The following additional information is provided in support of this request:

1. Salem Generating Station, Unit 1, recently received a violation for the failure to perform auxiliary feedwater (AFW) discharge piping system pressure tests on buried piping components in accordance with the ASME Code, Section XI, IWA-5244. This NRC violation supports the need to seek relief from the requirement of IWA-5244(b)(1) of the 1998 Edition through the 2000 Addenda.
2. ASME has issued the following interpretations pertaining to IWA-5244:
 - a. On November 21, 2007, ASME issued interpretation XI-1-07-28 that clarified examination requirements specified in IWA-5244(b)(2). The ASME interpretation is included as Attachment 3 to this request. Using this interpretation would require a licensee to comply with IWA-5244(b)(2) when testing buried components with valves that are not capable of isolating the portion of the component under test. The test required by IWA-5244(b)(2) is a test to confirm that flow during operation is not impaired.
 - b. On October 14, 2008, ASME issued interpretation XI-1-07-37 pertaining to the intent of IWA-5244(b)(1) as it applies to buried components with butterfly valves that are not designed to be leak-tight. This interpretation is included as Attachment 4 to this request. It supports the position that buried components with butterfly valves that are not leak-tight should receive an unimpaired flow test.

Salem Unit 2 Inservice Inspection Program
Relief Request S2-I4R-104
10 CFR 50.55a

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The basis for the proposed alternative is as follows:

The requirements of IWA-5244 (b)(1) to perform a pressure drop test cannot be performed. The valves installed in the SW system that would isolate the piping for drop testing are butterfly valves and are not capable of the leak tightness required to perform a pressure drop test. There are no locations available for installation of flow measuring devices in the SW system near the buried portions that would be capable of measuring flow with sensitivity adequate for comparing flow at inlet and outlet of headers.

Industry experience indicates that neither the change in flow test IWA-5244(b)(1) nor the unimpaired flow test IWA-5244(b)(2) are sufficiently sensitive to detect small through-wall leakage in these buried components, due to relatively high system flow rates and accuracy of flow measurement instrumentation. As such, there is no appreciable difference between the level of quality and safety achieved by performing either of these tests.

Visual examinations of ground surface areas are capable of detecting potentially small through-wall leakage in the buried component. These visual examinations and visual examination of piping inside diameter provide reasonable assurance of the structural and leak-tight integrity of the buried components.

The SW Nuclear Headers are inspected under the GL 89-13 program, where valves are opened and/or removed and visual inspection and repairs are performed on entire buried SW Nuclear Header piping sections.

Inspection frequency information for these inspections is located in Table 1.

Salem Unit 2 Inservice Inspection Program
Relief Request S2-I4R-104
10 CFR 50.55a

Table 1: Current Inspection frequency for Service Water

Inspection Frequency	Last Inspection	Scope/actions	Next Inspection
36 Month (2RFO)	2R16 (S2008)	21 SW header: crawl through inspection performed; inspection performed using remote video inspection system	2R18 (S2011)
36 Month (2RFO)	2R17 (F2009)	22 SW header, crawl through inspection performed; inspection performed using remote video inspection system	2R19 (F2012)

Most recent visual internal inspections on the buried portions of the 21 and 22 nuclear headers indicate that the piping is maintained in good condition and is unobstructed. The inspections cover approximately 300 feet for each buried header and span from the service water intake structure to the pipe chase under refueling water storage tanks and then continues back underground to the auxiliary building. The buried piping is prestressed concrete cylinder piping with rubber and steel joints. (reference PSEG drawing 219563, Attachment 5)

Pursuant to 10CFR50.55a(a)(3)(ii), relief is requested because performing the tests on the Nuclear Service Water system at Salem in accordance with the code would result in hardship or unusual difficulty without compensating increase in level of quality or safety on the basis.

6. Duration of Proposed Alternative

The proposed alternative will be used for the remainder of the third ten-year interval of the Inservice Inspection Program for Salem Unit 2, which began November 27, 2003 and is currently scheduled to end on November 27, 2013.

7. Precedents

Relief from the requirements of IWA-5244 (for various ASME Code Editions/Addenda) has been granted to other licensees, as documented in the following relief requests:

- 7.1. Millstone Power Station, Units 2 and 3, Relief Request IR-2-40, RR-89-57, and IR-2-41, Approved July 10, 2008, TAC Nos. MD7732 and MD7733.

Salem Unit 2 Inservice Inspection Program
Relief Request S2-I4R-104
10 CFR 50.55a

- 7.2. Vermont Yankee Nuclear Power Station, Relief Request ISI-PT-01, Approved January 31, 2008, TAC No. MD5436.
- 7.3. Duane Arnold Energy Center, Relief Request NDE-R007, Approved June 12, 2007, TAC No. MD2523.
- 7.4. Prairie Island Nuclear Generating Plant, Units 1 and 2, Relief Request Nos. 1-RR-4-7 and 2-RR-4-7, Approved October 31, 2007, TAC Nos. MD3809 and MD3810.
- 7.5. Byron Station, Units 1 and 2, and Braidwood Station, Units 1 and 2, Relief Requests I3R-07 and I2R-46, Approved January 16, 2007, TAC Nos. MD1757, MD1758, MD1759, and MD1760.
- 7.6. Cooper Nuclear Station, Relief Request PR-06, Approved October 2, 2006, TAC No. MD0286.
- 7.7. Brunswick Steam Plant, Relief Request RR-11 SER, Dated February 17, 2000, TAC Nos. MA2108 and MS2109.

8. Reference

- 8.1. ASME Boiler and Pressure Vessel Code, Section XI, Interpretations, Volume 58, XI-1-07-28, issued November 21, 2007. [Attachment 3]
- 8.2. ASME Boiler and Pressure Vessel Code, Section XI, Interpretations, Volume 59, XI-1-07-37, issued October 14, 2008. [Attachment 4]
- 8.3. Salem Nuclear Generating Station – NRC Integrated Inspection Report 05000272/2010003 and 05000311/2010003, dated August 10, 2010.
- 8.4. PSEG Drawing 219563

Attachment 3

Salem Nuclear Generating Stations
Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

ASME Boiler and Pressure Vessel Code, Section XI, Interpretations
Volume 58

ASME Boiler and Pressure Vessel Code

SECTION XI

INTERPRETATIONS

Volume 58

Interpretations of the Code are distributed annually in July with the issuance of the edition and subsequent addenda. Interpretations posted in January at www.cstools.asme.org/interpretations are included in the July distribution. Interpretations of Section III, Divisions 1 and 2, are part of the update service to Section III, Subsection NCA.

Interpretations Volumes 54 through 56 were included with the update service to the 2004 Edition of the Code; Volume 57 is the first Interpretations volume to be included with the update service to the 2007 Edition.

Section	Vol. 57	Vol. 58	Vol. 59
I	7/07	7/08	
II-A	7/07	7/08	
II-B	
II-C	
II-D (Customary)	7/07	...	
II-D (Metric)	
III-NCA	7/07	7/08	
III-3	7/07	...	
IV	7/07	7/08	
V	7/07	7/08	
VI	
VII	
VIII-1	7/07	7/08	
VIII-2	7/07	7/08	
VIII-3	7/07	7/08	
IX	7/07	7/08	
X	...	7/08	
XI	7/07	7/08	
XII	

SECTION XI — INTERPRETATIONS VOL. 58

Interpretation: XI-1-07-28

Subject: IWA-5244 (1995 Edition With the 1995 Addenda Through the 2007 Edition)

Date Issued: November 21, 2007

File: IN07-009

Question: Does the requirement of IWA-5244(b)(2) apply to buried components with valves that are not capable of isolating the portion of the component under test?

Reply: Yes.

Attachment 4

Salem Nuclear Generating Stations
Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

ASME Boiler and Pressure Vessel Code, Section XI, Interpretations
Volume 59

ASME Boiler and Pressure Vessel Code

SECTION XI

INTERPRETATIONS

Volume 59

Interpretations of the Code are distributed annually in July with the issuance of the edition and subsequent addenda. Interpretations posted in January at www.cstools.asme.org/interpretations are included in the July distribution. Interpretations of Section III, Divisions 1 and 2, are part of the update service to Section III, Subsection NCA.

Interpretations Volumes 54 through 56 were included with the update service to the 2004 Edition of the Code; Volume 57 is the first Interpretations volume to be included with the update service to the 2007 Edition.

Section	Vol. 57	Vol. 58	Vol. 59
I	7/07	7/08	7/09
II-A	7/07	7/08	7/09
II-B
II-C
II-D (Customary)	7/07	...	7/09
II-D (Metric)	7/09
III-NCA	7/07	7/08	7/09
III-3	7/07
IV	7/07	7/08	7/09
V	7/07	7/08	...
VI
VII
VIII-1	7/07	7/08	7/09
VIII-2	7/07	7/08	7/09
VIII-3	7/07	7/08	7/09
IX	7/07	7/08	7/09
X	...	7/08	...
XI	7/07	7/08	7/09
XII	7/09

SECTION XI — INTERPRETATIONS VOL. 59

Interpretation: XI-1-07-36

Subject: Table IWC-2500-1, Examination Categories C-B, C-C, and C-D (1989 Edition Through the 2007 Edition With the 2008 Addenda); Table IWD-2500-1, Examination Category D-A (1995 Edition With the 1995 Addenda Through the 2007 Edition With the 2008 Addenda)

Date Issued: September 15, 2008

File: 08-674

Question (1): Is it the intent of Table IWC-2500-1 that Category C-B applies to pressure-retaining nozzle welds in storage tanks, in addition to pressure vessels?

Reply (1): No.

Question (2): Is it the intent of Table IWC-2500-1 that Categories C-C and C-D apply to storage tanks, in addition to pressure vessels?

Reply (2): No.

Question (3): Is it the intent of Table IWD-2500-1 that Category D-A applies to storage tanks, in addition to pressure vessels?

Reply (3): No.

Interpretation: XI-1-07-37

Subject: IWA-5244 (1995 Edition Through the 2007 Edition With the 2008 Addenda)

Date Issued: October 14, 2008

File: 08-701

Question: Is it the intent of IWA-5244(b)(1) that the configuration of isolable by means of valves applies to buried components with butterfly valves that are not designed to be leak tight?

Reply: No.

Interpretation: XI-1-07-38

Subject: Fig. IWD-2500-1(b) (1989 Edition Through the 2007 Edition With the 2008 Addenda); Table IWF-2500-1 (1989 Edition With the 1990 Addenda Through the 2007 Edition With the 2008 Addenda)

Date Issued: October 14, 2008

File: 08-675

Question (1): Is it the intent of Fig. IWD-2500-1(b) that only exterior surfaces of the welded attachment require examination?

Reply (1): Yes.

Question (2): Is it the intent of Table IWF-2500-1 that examinations are required only on portions of component supports that are accessible for examination without disassembly or removal of support members?

Reply (2): Yes.

Attachment 5

Salem Nuclear Generating Stations
Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

PSEG Drawing 219563

**THIS PAGE IS AN
OVERSIZED DRAWING OR
FIGURE,**

**THAT CAN BE VIEWED AT THE
RECORD TITLE: DRAWING NO:**

**SALEM NUCLEAR GENERATING
STATION
YARD SERVICEWATER PIPING TO
AUX. BLDG.**

PSEG NUCLEAR, L.L.C.

D01X