

Ziev, Tracey

From: OHara, Timothy *RI*
Sent: Thursday, May 06, 2010 9:42 PM
To: Modes, Michael; Conte, Richard
Cc: Ennis, Rick; Burritt, Arthur; DeFrancisco, Anne; Farrar, Karl
Subject: RE: Salem Violation Consensus

Rich,

I think this is the best way to handle the situation and address all the possibilities.

I propose we arrange a call with PSEG on Monday to communicate the following:

- (1) "clarify" the preliminary violation we informed them about at the Debrief on Wednesday with the details (below), i.e. add that they are in violation of the structural integrity tech. spec. and,
- (2) inform PSEG that a relief request explaining the missed "inservice inspections (pressure tests)" will be needed to eventually restore compliance (when approved by NRR).

I'll be working at home on Monday and I'll be available to lead the call or participate. I can call Howard Berrick on Friday to ask him to coordinate the PSEG people for a Monday call if you want. Please keep me involved in what happens on this so that I get the violation and report correct.

Tim OHara

From: Modes, Michael *RI*
Sent: Thursday, May 06, 2010 4:15 PM
To: Conte, Richard
Cc: OHara, Timothy; Ennis, Rick; Burritt, Arthur; DeFrancisco, Anne; Farrar, Karl
Subject: Salem Violation Consensus

We are going to site the regulation 50.55a

In turn the ASME requirement they did not comply with.

This will then result in a failure to show structural integrity.

We will cover the absence of a NOED by also citing, concurrently, the tech spec violation as a subtier of the violation.

We will issue an NOV (with 30 day reply) if they have not submitted the relief request by the time we issue the report in order to facilitate the correct behavior.

If NRR has the request in hand we will issue this as non-cited.

As a secondary benefit we establish a precedent for pressure testing and structural integrity for buried piping that will stand in the absence of the tech spec requirement. This tech spec requirement does not exist in Standard Tech Specs, nor will it last long in the Salem tech specs.

All in favor say "Aye".

The ayes have it ... the motion carries.