

## UNITED STATES NUCLEAR REGULATORY COMMISSION REGION I

475 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1415

July 15, 2010

Arthur L. Burritt, Chief Projects Branch 3

**Division of Reactor Projects** 

MEMORANDUM TO:

THRU:

Richard J. Conte, Chief /RA by E. Burket for/ Engineering Branch 1 Division of Reactor Safety

FROM:

Timothy L. OHara, Reactor Inspector /RA/ Engineering Branch 1 Division of Reactor Safety

SUBJECT:

INSERVICE INSPECTION ACTIVITIES INSPECTION FEEDER FOR SALEM UNIT 1, INSPECTION REPORT 05000272/2010003

The enclosed feeder contains input for the subject report resulting from inspection of Inservice Inspection (ISI) activities during the period from April 5, 2010 to June 28, 2010, at Salem Unit 1. The inspection was conducted using Inspection Procedure 71111.08, Inservice Inspection Activities and Temporary Instruction (TI) 2515/172, Reactor Coolant System Dissimilar Metal Butt Welds. The results of this inspection were presented to Mr. Ed Eilola, Salem Plant Manager, at an exit meeting on June 28, 2010.

## Suggested Cover Letter Input

This feeder documents one NRC-identified finding of very low safety significance (Green). This finding was determined to be a violation of an NRC requirement. This feeder also documents a licensee-identified violation, which was determined to be of very low safety significance, in section 4OA7 of this report. This licensee-identified violation is also being documented as an issue of agency concern, in accordance with, IMC 0612-10 and IMC 0612-11. Because these violations are of very low safety significance and because the issues were entered into your corrective action process, these findings are being treated as non-cited violations (NCVs) consistent with Section VI.A.1 of the NRC Enforcement Policy.

Enclosure: Feeder for Salem Unit 1, Inspection Report No. 05000272/2010003, 05000311/2010003

A. Burritt

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<u>cc w/Enclosure</u>: (VIA E-MAIL) A. Burritt, DRP L. Cline, DRP D. Schroeder, DRP, SRI - Salem Unit 1 T. O'Hara, DRS R. Hardies, NRR

DRS Files

## SUNSI Review Complete: <u>TLO/RJC</u> (Reviewer's Initials) Non-Public Designation Category: MD 3.4 Non-Public A.7

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2

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## SUMMARY OF FINDINGS

## **Reactor Safety**

#### Cornerstone: Mitigating Systems

## A. <u>NRC Findings</u>

<u>Green.</u> The inspector identified a non-cited violation (NCV) of very low safety significance (Green) for the PSEG failure to perform Auxiliary Feedwater System (AFW) discharge piping pressure tests on buried piping components as required by 10 CFR 50.55a(g)(4) and the referenced American Society of Mechanical Engineers Code (ASME), Section XI, paragraph IWA-5244 for Salem Unit 1 and Salem Unit 2. The required tests are intended to intended to provide evidence of the structural integrity of the buried piping portions of the system. The affected piping is safety related, ASME Class 3, Seismic Class 1 piping. This performance deficiency is more than minor because the condition affected the Equipment Performance attribute (availability and reliability) of the mitigating systems cornerstone objective to ensure the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage). No Cross Cutting Aspect is assigned to this violation because this condition is not indicative of current performance.

#### B. Licensee Identified Findings

• A violation of very low safety significance, which was identified by PSEG, was reviewed by the inspector. Corrective action taken or planned by PSEG were entered into the corrective action program. The violation and corrective action (Notification) number is described in Section 40A7 of this report.

#### REPORT DETAILS

#### 1R08 Inservice Inspection (ISI) (7111108 - 1 Sample)

#### a. Inspection Scope

The inspector observed a selected sample of nondestructive examination (NDE) activities in process. Also, the inspector reviewed the records of selected additional samples of completed NDE and repair/replacement activities. The sample selection was based on the inspection procedure objectives and risk priority of those components and systems where degradation would result in a significant increase in risk of core damage. The observations and documentation reviews were performed to verify that the activities inspected were performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code requirements.

The inspector reviewed the licensee's performance of a visual inspection (VT) of the Unit 1 Reactor Vessel Closure Head (RVCH) and the installed upper head penetrations. The inspector reviewed the visual procedure, the qualifications of the personnel and reviewed the inspection report documenting the inspection results. The inspector also reviewed the data sheets for the penetrant tests completed on 3 of the penetration welds of the RVCH.

The inspector reviewed records of ultrasonic testing (UT), visual testing (VT), penetrant testing (PT) and magnetic particle testing (MT) NDE processes. PSEG did not perform any radiographic testing (RT) during this outage. The inspector reviewed inspection data sheets and documentation for these activities to verify the effectiveness of the examiner, process, and equipment in identifying degradation of risk significant systems, structures and components and to evaluate the activities for compliance with the requirements of ASME Code, Section XI.

#### Steam Generator Inspection Activities

The inspectors reviewed a sample of the Salem Unit 1 steam generator Eddy Current Testing (ECT) tube examinations, and applicable procedures for monitoring degradation of steam generator tubes to verify that the steam generator examination activities were performed in accordance with the rules and regulations of the steam generator examination program, Salem Unit 1 steam generator examination guidelines, NRC Generic Letters, Code of Federal Regulations 10CFR50, Technical Specifications for Salem Unit 1, Nuclear Energy Institute 97-06, EPRI PWR steam generator examination guidelines, and the ASME Boiler and Pressure Vessel Code Sections V and XI. The review also included the Salem Unit 1 steam generator degradation assessment and steam generator Cycle 21 and 22 operational assessment. The inspector also reviewed and verified the personnel certifications of the personnel participating in the SG ECT inspections during the 1R20 refueling outage.

The inspector reviewed the PSEG efforts in identifying wear degradation to the tubing in the four SGs at Salem U1. The majority of these wear indications was attributed to Anti Vibration Bar (AVB) wear in the u bend regions of the four SGs. The inspector reviewed the analyses and evaluations which determined that a total of 14 SG tubes would be removed from service by plugging.

## Boris Acid Corrosion Control Program Activities

The inspector reviewed the PSEG boric acid corrosion control program. The resident inspectors observed PSEG personnel performing boric acid walkdown inspections, inside containment, and in other affected areas outside of containment, at the beginning of the Unit 1 refueling outage. The inspector reviewed the Notifications generated by the walkdowns and the evaluations conducted by Engineering to disposition the Notifications. Additionally, the inspector reviewed a sample of Notifications and corrective actions carried out to repair the reported conditions.

#### Section XI Repair/Replacement Samples:

<u>AFW System Piping, Control Air & Station Air</u>: The inspector reviewed PSEG's discovery, reporting, evaluation and the repair/replacement of Unit 1 AFW piping which had been excavated for inspection during the April 2010 Unit 1 refueling outage (1R20). PSEG conducted this inspection in accordance with PSEGs Buried Piping Inspection Program.

The inspector reviewed the repair/replacement work orders and the 50.59 screening and evaluation for the AFW, CA and SA piping. The inspector reviewed the fabrication of the replacement piping, reviewed the documentation of the welding and NDE of the replacement piping and reviewed the pressure tests used to certify the replacement piping. Additionally, the inspector reviewed the specified replacement coating, the application of the replacement coating and the backfill of the excavated area after the piping had been tested.

The inspector reviewed the limited UT testing performed on the Unit 2 AFW piping and no significant degradation was reported.

#### Rejectable Indication Accepted For Service After Analysis:

The inspector reviewed the Notification and the UT data report of a rejectable wall thickness measurement on the #11 SG Feedwater elbow during 1R20. The inspector reviewed the additional wall thickness data taken to further define the condition and reviewed the finite element analysis (FEA) which verified that sufficient wall thickness remained to operate the component until the next refueling outage when it will be replaced.

#### Issue of Agency Concern; Buried, Safety Related Piping:

Because of an ongoing issue of Agency Concern about the degradation of buried piping this issue is being documented as a licensee-identified finding in Section 4OA7 in accordance with the guidance of IMC 0612-10.

During a planned excavation and inspection of the Unit 1 AFW buried piping to SG #12 and SG #14, PSEG identified severe corrosion (significantly below minimum wall thickness) of the safety related, ASME Class 3, Seismic Class 1 piping. PSEG repaired or replaced the affected Unit 1 buried AFW piping in May 2010. The inspector subsequently identified that this condition was a violation of 10 CFR 50, Appendix B, Criterion III, Design Control.

#### b. <u>Finding</u>

The inspector identified the following violation related to ASME, Section XI testing of buried Unit 1 and Unit 2 buried AFW piping.

Introduction The inspector identified a GREEN non-cited violation (NCV) of 10 CFR 50.55a(g)(4) and the referenced American Society of Mechanical Engineers (ASME) Code, Section XI, paragraph IWA-5244 for PSEG's failure to perform required pressure tests of buried components. This piping is safety related, 4.0" ID, ASME Class 3, Seismic Class 1 piping.

<u>Description</u> Portions of the Unit 1 and Unit 2 Auxiliary Feedwater (AFW) System piping is buried piping and has not been visually inspected since the plant began operation in 1977 for Unit 1 and since 1979 for Salem Unit 2. In April 2010, approximately 680 ft. (340 ft. of the #12 SG AFW supply and 340 ft. of the #14 SG AFW supply) of piping between the pump discharge manifold and the connection to the Main Feedwater piping to the affected SGs was discovered to be corroded to below minimum wall thickness (0.278") for the 1950 psi design pressure of the AFW System. The lowest wall thickness measured in the affected piping was 0.077". PSEG plans on excavating the Unit 2 buried piping to inspect the condition during the next Unit 2 outage scheduled for the spring of 2011.

10 CFR 50.55(a)(g)(4)(ii) requires licensees to follow the in-service requirements of the ASME Code, Section XI. Paragraph IWA-5244 requires licensees to perform pressure tests on buried components to demonstrate structural integrity of the tested piping. The pressure test required by IWA-5244 is considered to be an inservice inspection and is part of Section XI. Section XI and IWA-5244 do not specify any other non-destructive examinations (NDE) on buried components to ensure structural integrity. Thus, PSEG neglected to perform the only inservice inspection, intended to provide evidence of the structural integrity of this safety related buried piping. PSEG did not perform the required tests for Unit 1 during the 1<sup>st</sup> period (5/19/01 to 6/3/04) and 2<sup>nd</sup> period (6/24/04 to 5/20/08) periods of the 3<sup>rd</sup> In Service Inspection Interval, and for Unit 2 for the 1st period (5/19/01 to 6/3/04) and 2<sup>nd</sup> period (6/24/04 to 5/20/08) of the 3<sup>rd</sup> In Service Inspection Interval.

PSEG sought relief, from the NRC, from the previous Code required pressure testing in 1988 for Unit 1 only. Relief was granted to PSEG, by the NRC, to perform an alternate flow test in 1991 for Unit 1. However, PSEG did not perform the proposed alternate tests during the 2<sup>nd</sup> inservice interval and during the 1<sup>st</sup> (5/19/01 to 6/3/04) and 2<sup>nd</sup> (6/24/04 to 5/20/08) periods of the 3<sup>rd</sup> In Service Inspection Interval for Unit 1. Also, PSEG did not request relief from the required tests or perform perform the proposed alternate tests on the Unit 2 buried piping during the 1st period (5/19/01 to 6/3/04) and 2<sup>nd</sup> period (6/24/04 to 5/20/08) of the 3<sup>rd</sup> In Service Inspection Intervals. Thus, PSEG

missed an opportunity to identify and correct this performance deficiency which affects Unit 1 and Unit 2.

A second opportunity to identify and correct this performance deficiency was missed in 2002 when a similar condition (failure to perform buried piping pressure tests) was reported by Indian Point Unit 3. PSEG's review of operating experience reports did not identify that the same condition potentially existed at Salem Unit 1 and Unit 2.

PSEG replaced the affected buried Unit 1 piping during the refueling outage in April/May 2010. The required pressure tests were successfully completed after the replacement of the Unit 1 buried piping. Because the AFW system functioned as required during the plant shutdown prior to the start of 1R20 (April 2010), the system did not loose operability.

For Unit 2, PSEG completed an Operability Determination and a Risk Assessment for continued operation until the next scheduled refueling outage scheduled for spring 2011 for this issue. These evaluations determined that the condition was acceptable for continued operation until spring 2011.

<u>Analysis</u> The inspector determined that the licensee's failure to perform the required pressure test on this safety related buried piping was a performance deficiency for each Salem Unit. This condition was the result of the licensee's failure to meet the regulatory requirements of 10 CFR 50.55a(g)(4) and the ASME Code, Section XI, paragraph IWA-5244. This performance deficiency was reasonably within the licensee's ability to forsee and correct and should have been prevented.

The inspector determined that the performance deficiency was more than minor because this condition affected the Equipment Performance attribute (availability and reliability) of the mitigating systems cornerstone objective to ensure the availability, reliability and capability of systems that respond to initiating events to prevent undesirable consequences (i.e., core damage).

This finding affects the mitigating systems cornerstone by affecting the secondary, short term decay heat removal capability. Because the finding did not result in loss of operability or functionality the inspector determined that the finding was of very low safety significance, Green.

The inspector determined that a Cross Cutting Aspect did not exist because the issue was not indicative of current performance because the condition existed since 1991, more than 3 years ago.

<u>Enforcement</u> 10 CFR 50.55a(g)(4) states, in part: "Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components ...which are classified as ASME Code Class 1, Class 2 and Class 3 must meet the requirements, ..., set forth in Section XI of editions of the ASME Boiler and Pressure Vessel Code". Paragraph IWA-5244, Buried Components, of Section XI says, in part,

"(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 the rate of pressure loss. Alternatively, the test may determine the change in flow between the ends of the buried components. ..."

Contrary to these requirements, PSEG did not perform the required pressure tests of the buried AFW piping to the #12 SG and #14 SG at Salem Unit 1 during the 2<sup>nd</sup> In Service Inspection Interval (2/27/88 to 5/19/01) and during the 1<sup>st</sup> (5/19/01 to 6/3/04) and 2<sup>nd</sup> (6/24/04 to 5/20/08) periods of the 3<sup>rd</sup> In Service Inspection Interval (5/19/01 to 5/19/11). Also, contrary to these requirements, PSEG did not perform the required pressure tests of the buried piping to the #22 SG and #24 SG for Unit 2 for the 1st period (5/19/01 to 6/3/04) and 2<sup>nd</sup> period (6/24/04 to 5/20/08) of the 3<sup>rd</sup> In Service Inspection Interval. Consequently, from 2/27/88 to 4/20/07) the required pressure tests were not performed to demonstrate structural integrity on the affected buried Unit 1 AFW piping.

Because PSEG entered this condition into the corrective action process (Notification 20459686) and because it is is of very low safety significance (Green), it is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. NCV 50-272/2010-?? and NCV 50-311/2010-??

## 4OA2 Identification and Resolution of Problems (71152)

a. Inspection Scope

The inspectors reviewed a sample of corrective action reports (Notifications), listed in Attachment 2 which involved in-service inspection related issues, to ensure that issues are being promptly identified, reported and resolved. The sample of Notifications selected did demonstrate that non-conformances are being identified, evaluated and appropriately addressed.

b. <u>Findings</u>

No findings of significance were identified.

## 4OA5 Temporary Instruction (TI) 2515/172

#### a. Inspection Scope

The Temporary Instruction (TI), 2515/172 provides for confirmation that owners of pressurized-water reactors (PWRs) have implemented the industry guidelines of the Materials Reliability Program (MRP) -139 regarding nondestructive examination and evaluation of certain dissimilar metal welds in the RCS containing nickel based Alloys 600/82/182.

During 1R20 PSEG inspected the dissimilar metal weld on the 1" reactor vessel drain piping with no detected indications. Salem Unit 1 has dissimilar metal welds in the eight reactor coolant system piping to reactor vessel nozzle safe end welds. No additional inspections or MSIP applications were performed during 1R20.

This TI requires documentation of specific questions in an inspection report. The questions and responses for the IR 05000272/2010003 section 4OA5 are included in this report as Attachment "B-1".

## b. Findings

No findings of significance were identified.

#### 4OA6 Meetings, including Exit

The inspectors presented the ISI inspection and TI 2515/172 inspection results to Mr. Ed Eilola, Salem Plant Manager, and other members of the PSEG staff at the conclusion of the inspection at an exit meeting on June 28, 2010 for Salem Unit 1. The licensee acknowledged the conclusions and observations presented. Some proprietary information was reviewed during this inspection and was properly destroyed. No proprietary information is contained in this report.

## 4OA7 Licensee Identified Violations

The following finding of very low safety significance was identified by PSEG and is a violation of 10 CFR 50, Appendix B, Criterion III, Design Control, an NRC requirement. PSEG did not provide an effective protective coating for the buried AFW piping. This issue has been evaluated via IMC 0609, Attachment 4, Initial Screening and Characterization of Findings and IMC 0612, Appendix B, Issue Screening.

During a planned excavation and inspection of the Unit 1 AFW buried piping to SG #12 and SG #14, PSEG identified severe corrosion (significantly below minimum wall thickness) of the safety related, ASME Class 3, Seismic Class 1 piping. The area of the worst corrosion resulted in a wall thickness of 0.077". PSEG repaired or replaced the affected Unit 1 buried AFW piping before returning the plant to operation.

This finding affects the mitigating systems cornerstone by affecting the secondary, short term decay heat removal capability. Because the finding did not result in loss of operability or functionality the inspector determined that the finding was of very low safety significance, Green. The inspector determined that a Cross Cutting Aspect did not exist because the issue was not indicative of current performance because the condition existed since 1977.

10 CFR 50, Appendix B, Criterion III, Design Control, states, in part "Measures shall be established to assure that applicable regulatory requirements and the design basis, ..., for those structures, systems, and components to which this appendix applies are correctly translated into specifications, drawings, procedures, and instructions. These measures shall include provisions to assure that appropriate quality standards are specified and included in design documents and that deviations from such standards are controlled. Measures shall also be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to the safety-related functions of the structures, systems and components."

Contrary to these requirements, PSEG did not provide engineering evaluations, vendor certification, or testing data to demonstrate that the specified coating would protect the buried AFW piping for the design lifetime of the plant. Also, PSEG did not assure appropriate quality standards which assure that deviations from such standards were controlled. Additionally, PSEG did not provide measures for the selection and review for suitability of the coating materials for the buried AFW piping application, for periodic inspections to ensure that the applied coating was protecting the buried AFW piping, and did not provide engineering details demonstrating the ability of the coating to protect the buried AFW piping for the design life of the plant.

Because PSEG entered this condition into the corrective action process (Notification 20456999) and because the issue is of very low safety significance (Green), this issue is being treated as a non-cited violation consistent with Section VI.A.1 of the NRC Enforcement Policy. **NCV 50-272/2010003-??** 

## ATTACHMENT

#### SUPPLEMENTAL INFORMATION

#### **KEY CONTACTS**

#### Licensee Personnel:

Howard Berrick, PSEG Pat Fabian, PSEG Mohammad Ahmed, PSEG Tony Oliveri, PSEG Tom Roberts, PSEG Ali Fakhar, PSEG Len Rajkowski, PSEG Dave Mora, PSEG Edley Giles, PSEG Walter Sheets, PSEG Bob Montgomery, PSEG Jim Mellchiona, PSEG Bill Mattingly, PSEG Pat Van Horn, PSEG Jim Barnes, PSEG Justin Werne, PSEG **Rick Villar, PSEG** Matthew Murray, PSEG

## LIST OF DOCUMENTS REVIEWED

#### Notifications:

20457869, Control Air Piping Leak\* 20462034, Basis AFW Discharge Line Design Pressure\* 20461785, Untimely retrieval of Design Documents\* 20461255. U2 Containment Liner Blisters\* 20459259. U2 Containment Liner Blisters\* 20459689, failure to do IWA-5244 pressure tests\* 20456999, Guided Wave (GW) pipe wall loss 20% to 44%\*, in Equipment Apparent Cause Evaluation (EQ;ACE) Charter 20457854, see Equipment Apparent Cause Evaluation (EQ: ACE) Charter 20457869, Air Line Leak, in Equipment Apparent Cause Evaluation EQ: ACE Charter 20458147, see Equipment Apparent Cause Evaluation (EQ: ACE) Charter 20458148, see Equipment Apparent Cause Evaluation (EQ: ACE) Charter 20458568, see Equipment Apparent Cause Evaluation (EQ: ACE) Charter 20458554, 11 CA HDR Line In Fuel Xfer Area Degraded\* 20458761, 1R20 CA Buried Pipe Coating Repair\* 20458925, 1R20 SA Buried Pipe Coating Repair\* 20457262, (88) 1R20 AF Buried Pipe Inspection Results\* 20460624, Need Heat Trace on AF lines in FFT Area 20457877, U1 Containment Liner Corrosion at 78' El.\*

20459259, U1 Corrosion on Containment Liner\* 20459303, #14 AF pipe damaged penetration seal\* 20459304, #12 AF pipe damaged penetration seal\* 20459454, Request for Additional UT Data, 4/18/10 (due to 0.077" reading)\* 20344017. Inspect steel liner in 1R19 20235636, NRC noted water running down containment wall 20459189, Question on location of RFO-14 location of a PZR shell weld 20290560, Replace section of 15B FWH shell-S1-R18 20457879, (184) 1R20 FAC(N18) 14# elbow below Tmin 20456828, (66) valve has visible boron buildup 1R20 20459232, Heavy Dry White Boron Vly Packing (1R20) 20456834, Heavy Dry White Boron VIv Packing (1R20) 20456840, Medium Dry White Boron VIv Packing (1R20) 20456839, Medium Dry White Boron VIv Packing (1R20) 20389147, Recordable ISI Indications on CVC Tank 20344017, Inspect Steel Liner in 1R19 @ Containment Sump 20235636, NRC Noted Water Running Down Containment Wall 20392631, ARMA From ISI Program Audit 2008 20460624, Need Heat Trace on AF lines in FTT Area 20333050, Response to NRC NOV EA-07-149 20322039, 2<sup>nd</sup> Interval ISI NRC Violation 20397518, A1CVC-1CV180 Chk Vlv Stuck Open - PI&R review 20444514, Boric Acid Leak from Drain Line - PI&R review 20445314, boron leak - PI&R review 20448241, Minor Packing Leak – BAC - PI&R review 20435861, 21SJ313 Has Boric Acid Leakage - PI&R review 20417331. Boric Acid Leak at 11 CV156 - PI&R review 20411151, Tubing leak on 1SS653 - PI&R review 20414343, 12 Charging Pump seal inj. Line - PI&R review 20395346, 12 Bat PP Seal Leak - PI&R review 20450330, Containment Liner Corrosion - PI&R review 20385733, Severe Corrosion on FP Valve - PI&R review 20438320, (217) Op Eval. Of Containment Corrosion - PI&R review 20387897, Significant outlet pipe corrosion - PI&R review 20397225, MIC Corrosion Causing Through Wall Leak - PI&R review 20436836, Repair Cracks in Battery Cells - PI&R review 20392145, Update U1 ISI Relief Request Book - PI&R review 20449447, Update Salem Unit 1 ISI 10 Yr Plan - PI&R review 20449744, Update Salem Unit 1 Containment ISI 10 Yr Plan - PI&R review 20449442, Update Salem Unit 2 Containment ISI 10 Yr Plan - PI&R review 20449554, Salem U2 RFO18 ISI Scope - PI&R review 20416605, INPO PSIRV Alloy 600 Program - PI&R review 20404057, Unit 2 ISI (MSIP) - PI&R review 20392631, ARMA FROM ISI PROGRAM AUDIT 2008 - PI&R review 20388065, Water leaking in decon room - PI&R review 20439023, 23 CFCU Head Leakage - PI&R review 20439022, SW Header Leakage 23 CFCU - PI&R review 20389148, 1R19 ISI Weld Exam Limitations - PI&R review 20416605, INPO PSIRV Alloy 600 Program - PI&R review 20449442, Update Salem 2 Containment ISI 10 vr. Plan - PI&R review 20449554, Salem Unit 2 RFO18 ISI Scope - PI&R review

20449747, Update Salem 2 ISI 10 Yr. Plan - PI&R review 20401542, Perform ISI BMV Exam on RPV Upper Head - PI&R review 20449063, SA U1 Service Inspec – ISI & U1 TI 2515 - PI&R review 20389147, Recordable ISI Indications on CVC Tank - PI&R review 20392145, Update U1 ISI Relief Request Book - PI&R review 20449744, Update Salem U1 Containment ISI 10 Yr. Plan - PI&R review 20409943, NRC RIS 2009-04 SG Tube Insp Rqmts – PI&R review 20459851, Section XI Exams Limited to 90% or Less – PI&R review 20450520, Recoat Affected Areas of Liner 2R18 – PI&R review 20457388, Excavation Issues – PI&R review

\*Denotes this Notification was generated as a result of this inspection

Section XI Repair/Replacement Samples:

W.O. 60079414, 14" Carbon Steel Elbow FAC indication below minimum wall

- W.O. 60084266, Salem U1 AF Buried Piping Inspection
- W.O. 60089561, 80101381: Replace Aux FW U/G Piping
- W.O. 60064104; Repair 15B FWH Area
- W.O. 60084375, BACC Program repair to 1PS1
- W.O. 60089612, BACC Program repair to S1CVC-14CV392
- W.O. 60089615, BACC Program repair to S1SJ-13SJ25
- W.O. 60089848, 80101382 Advanced Work Authorization #2 FTTA Replace Aux. Feedwater Pipe
- W.O. 60089561, 80101381 Advanced Work Authorization Replace Aux. FW U/G Piping, 4/9/10

Non-Code Repair

W.O. 60089848, Repair Non-nuclear, safety related CA Pipe, Unit 1 FTTA W.O. 60089757, Test Non-nuclear, safety related CA Pipe Repair, Unit 1 FTTA

Miscellaneous Work Orders:

W.O. 60089917, Penetrations for CA & SA Lines, 4/23/10

W.O. 941017262, Activity 04, Excavate and Examine Auxiliary Feedwater Piping, Unit 2, 12/94 W.O. 941017262, Activity 03, Excavate and Examine Auxiliary Feedwater Piping, Unit 2, 12/94 W.O. 941017262, Activity 02, Excavate and Examine Auxiliary Feedwater Piping, Unit 2, 12/94 W.O. 941017262, Activity 01, Excavate and Examine Auxiliary Feedwater Piping, Unit 2, 12/94 W.O. 941017262, Activity 01, Excavate and Examine Auxiliary Feedwater Piping, Unit 2, 12/94 W.O. 941017262, Activity 01, Excavate and Examine Auxiliary Feedwater Piping, Unit 2, 12/94 W.O. 941017262, Activity 01, Excavate and Examine Auxiliary Feedwater Piping, Unit 2, 12/94 W.O. 90089561, Flush New AFW piping 12 and 14

#### Drawings & Sketches:

205236A8761-54, Salem Nuclear Generating Station, Unit No. 1, Auxiliary Feedwater Salem Unit 1 Aux Feed Piping, Allan Johnson, 4/10/10 80101381RO, Buried Pipe, Replaced AFW Piping Arrangement 207483A8923-11, Salem Nuclear Generating Station, Unit No. 1 – Reactor Containment

Auxiliary Feedwater, Plans & Sections – Elev. 78' 10" & 100' 0", Mechanical Arrangement, Revision 8, 9/31/86

- 207483A8923-28, Sheet 1 of 4, Salem Nuclear Generating Station, Unit No. 1 Reactor Containment Auxiliary Feedwater, Plans & Sections – Elev. 84',Mechanical Arrangement, Revision 8, 9/31/86
- 207483A8923-31, Sheet 2 of 4, Salem Nuclear Generating Station, Unit No. 1 Reactor Containment Auxiliary Feedwater, Plans & Sections – Elev. 84', Mechanical Arrangement, Revision 8, 9/31/86
- 207483A8923-28, Sheet 3 of 4, Salem Nuclear Generating Station, Unit No. 1 Reactor Containment Auxiliary Feedwater, Plans & Sections – Elev. 84',Mechanical Arrangement, Revision 8, 9/31/86
- 207483A8923-30, Salem Nuclear Generating Station, Unit No. 1 Reactor Containment Auxiliary Feedwater, Plans & Sections – Elev. 84', Mechanical Arrangement, Revision 8, 9/31/86
- 207610A8896-12, Salem Nuclear Generating Station, Unit No. 1 Auxiliary Building & Reactor Containmnet Compressed Air Piping, Aux. Building El. 84 East & React. Contain. El. 78, Mechanical Arrangement, Revision 8, 9/31/86

## Design Change Packages/Equivalent Change Packages

- 80101382, Revision 2, Replace Salem Unit 1 AFW Piping from the Unit Mechanical Penetration Area El. 78'-0" to the Unit 1 Fuel Transfer Tube Area El. 100'-0"
- 80101381, Revision 1, Replace in-kind the Salem Unit 1 AF Piping that runs underground from the Unit 1 Fuel Transfer Tube Area to the Unit 1 Main Steam Outer Penetration Area

## 50.59 Applicability Reviews, Screenings & Evaluations

80101382; Salem Unit 1 12/14 AF Piping Reroute; 4/24/10

## System & Program Health Reports & Self-Assessments:

Salem Boric Acid Corrosion Control Program Focused Area Self-Assessment, 1/2010 70106830, Salem S1R20 NRC ISI Inspection Check-In Self Assessment 70095327, Salem Boric Acid Corrosion Control Program Focused Area Self-Assessment, 4/29/09

#### Program Documents

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#### **Procedures**

## DETAILED AND GENERAL, VT-1 AND VT-3 VISUAL EXAMINATION OF ASME CLASS MC AND CC CONTAINMENT SURFACES AND COMPONENTS

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- ER AP 331 1001, Revision 2, Boric Acid Corrosion Control (BACC) Inspection Locations, Implementation And inspection Guidelines
- ER AP 331 1002, Revision 3, Boric Acid Corrosion Control (BACC) Program Identification, Screening, and Evaluation

ER - AP - 331 - 1003, Revision 1, RCS Leakage Monitoring And Action Plan

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ER - AA - 330 - 001, Revision 7, SECTION XI PRESSURE TESTING

LS - AA - 125, Revision 13; Corrective Action Program (CAP) Procedure

- LS AA 120, Revision 8; Issue Identification And Screening Process
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- SH.RA-IS.ZZ-0150(Q) Revision 8, 10/19/04; Nuclear Class 1, 2, 3 and MC Component Support Visual Examination
- OU-AP-335-043, Revision 0; <u>BARE METAL VISUAL EXAMINATION (VE) OF CLASS 1 PWR</u> COMPONENTS CONTAINING ALLOY 600/82/182 AND CLASS 1 PWR REACTOR
  - VESSEL UPPER HEADS
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003753, VT-10-113, PRV nozzle sliding support 003754, VT-10-114, RPV nozzle sliding support 006325, UT-10-041, PZR longitudinal shell weld J (100%) 007500, UT-10-132, PZR surge line nozzle (100%) 007901, UT-10-028, 13 SG lower head to tubesheet weld (67%) 006073, VE-10-026, CRDM TO VESSEL PENETRATION WELD, 4/12/10 008001, VE-10-027, 31-RCN-1130-IRS 008026, VE-10-028, 29-RCN-1130-IRS 009070, VE-10-030, 12-STG Channel Head Drain (100%) 033300, UT-10-027, 4-PS-1131-27 (100%) 033200, UT-10-029, 4-PS-1131-26 (100%) A-6

033100, UT-10-032, 4-PS-1131-25 (100%) 032300, UT-10-033, 4-PS-1131-17 (100%) 031700, UT-10-040, 4-PS-1131-12 (100%) 032600, UT-10-034, 4-PS-1131-20 (100%) 047600, UT-10-045, 29-RC-1140-3 (100%) 051200, UT-10-048, 29-RC-1120-3 (100%) 203901, UT-10-047, 32-MSN-2111-1 (100%) 204001, UT-10-046, 16-BFN-2111-1 (70.64%) 210586, UT-10-025, 14-BF-2141-19 (100%) 210588, UT-10-024, 14-BF-2141-20 (100%) 836300, IWE: VT-10-338, PNL-S1-343-1 836400, IWE: VT-10-333, ALK-S1-100-tubing 840000, IWE: Vert Leak Channels 1 - 14 006073, VE-10-026, RPV Upper Head Inspection 006051, PT-10-004, CRDM Housing Weld Exams, penetrations #66, 67, and 72 Salem Unit 1, VT-2, Visual Examination Record, 12/14 AF FTTA, W.O. 60089848, 4/26/10 (VT) Salem Unit 1, VT-2, CA Repair Snoop Test, W.O. 60089575, 4/27/10 Salem Unit 1, UT, W.O. 60084266, Yard AF, 4/18/10 Salem Unit 2, UT, W.O.60089851, Exam of containment liner Salem Unit 1, UT 1-SGF-31-L2 FW elbow below min. wall Salem Unit 1, UT, W.O. 30176541, 1-SGF-31-L2 FW elbow below min. wall Salem Unit 1, UT, W.O. 60084266, AFW Order 50113214, ST 550D, Surveillance: ISI Perform PORV Check Order 50118090, ST 550D, Surveillance: OPS Perform PORV Check W.O. 60089848, VT-2 Visual Examination Record, 12/14 AFW in FTTA, 4/26/10 W.O. 941017262, Activity 02; Salem Unit 2, Excavate and Examine Auxiliary Feedwater Piping, 12/2/94 W.O. 60084266, UT Unit 1 AFW (thinnest area), 4/20/10 UT Analysis, Component 1-SGF-31-L2 (14" FW Elbow below Minimum wall), 4/10/10 W.O. 60089851, Unit 2 Containment Liner blister UT measurements, 4/21/10 W.O. 60086175, Unit 1 Containment corrosion 78' elevation W.O. 60084266, Unit 1 AFW piping UT measurements, 4/12/10 W.O. 30176541, Unit 1 AFW piping UT measurements, 4/12/10 W.O. 60084266, Unit 1 AFW piping UT measurements, 4/7/10 W.O. 60084266, Unit 1 AFW piping UT measurements, 4/5/10 W.O. 60084266, Unit 1 AFW pipe UT measurements at supports, 4/18/10 W.O. 30176541, Unit 1 CA piping UT measurements in FTTA 401600, VE-04-198; Hope Creek system pressure test CST to HPCI/RCIC and Core Spray, 11/5/04 VT-2, Salem Unit 1 AF 12 & 14 Pressure Test, 4/25/10 W.O. 60089661, UT measurements, Unit 2 AFW Piping #24 in FTTA, 4/25/10

W.O. 60089661, UT measurements, Unit 2 AFW Piping #22 in FTTA, 4/26/10

Eddy Current	Testing Personnel Qualification Records
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B8 B0 B5 B5 B2 F3 C D7 D9 H2 F3 B5 B5 B5 B5 B5 B5 B5 B5 B5 B5 B5 B5 B5	2421 3731 0500 5127 5128 2576 3961 1560 7895 9573 5502 2039 5380 9460 0427 5664 4260 3502 9815 5436 5042 3589 4014 2573 3530 3368 4305 4052 5975 3910 0268 3025 1465 3079 1756	C2028 C4596 C3340 D3858 H6267 H0282 I4048 J1978 2010983302133 P6459 R0830 R1164 S0608 2509981330193 K5858 1007951330114 L9168 L4332 F7460 F0037 3107943330158 6206070744 6507061922 1803983330125 2709977301226 P5304 P4006 R4201	R6452 R8002 S7752 T8251 V3197 R4142 R6279 G3380 B3720 R6900 A9608 N2574 I3805 T2170 N4815 M0945 P2963 M9715 K1903 D5318 W6070 M5096 J1945 L4588 C8042 N5330 L8267 F3453	T5616 R9311 G4943 C5542 F0075 F6623 F3453 G4943 G1311 H7791 J9141 M0950 M2665 M7006 M9459 M7007 M9082 N7035 N9952 R9311 S9098 T5616 T5565 W2639 W7912
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	3071			
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Multiple Weld History Record: 74587 Multiple Weld History Record: 74588 Multiple Weld History Record: 74589 Multiple Weld History Record: 74590 Multiple Weld History Record: 74591 Multiple Weld History Record: 74592 Multiple Weld History Record: 74593 Multiple Weld History Record: 74577 Multiple Weld History Record: 74625 Multiple Weld History Record: 74574 Multiple Weld History Record: 74624 Multiple Weld History Record: 74573 Multiple Weld History Record: 74572 Multiple Weld History Record: 74570 Multiple Weld History Record: 74571 Multiple Weld History Record: 74623 Multiple Weld History Record: 74622 Multiple Weld History Record: 74621 Multiple Weld History Record: 74537 Multiple Weld History Record: 74538 Multiple Weld History Record: 74537 Welder Stamp Number: P-664 Welder Stamp Number: P-65 Welder Stamp Number: P-466 Welder Stamp Number: P-57 Welder Stamp Number: E-64 Welder Stamp Number: P-710 Welder Stamp Number: P-207 Welder Stamp Number: P-666 Welder Stamp Number: P-708 Welder Stamp Number: E-89 Welder Stamp Number: P-84 Welder Stamp Number: P-228 Surface Exam Record: 60089561-0041 Surface Exam Record: 60089848-0001 Surface Exam Record: 60089848-0001 Surface Exam Record: 60089561-0041 Surface Exam Record: 60089561-0860

#### Miscellaneous Documents

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Electric Power Research Institute (EPRI), Steam Generator Integrity Assessment Guidelines, Technical Report 1012987, Revision 2, July 2006

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Salem Unit 1 – Buried Piping Risk Ranking

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## LIST OF ACRONYMS

ASME	American Society of Mechanical Engineers
BAST	Boric Acid Storage Tank
CEA	Control Element Assembly
CEDM	Control Element Drive Mechanism
CFR	Code of Federal Regulations
EDG	Emergency Diesel Generator
EPRI	Electric Power Research institute
EQ;ACE	Equipment Apparent Cause Evaluation
EQ	Environmental Qualification
ER	Engineering Request
FTTA	Fuel Transfer Tube Area
IMC	Inspection Manual Chapter
IP	Inspection Procedure
IR	NRC Inspection Report
LER	Licensee Event Report
LOCA	Loss of Coolant Accident
MT	Magnetic Particle Testing
MSIP	Mechanical Stress Improvement Process
NCV	Non-cited Violation
Notification	Corrective Action Notification
NRC	Nuclear Regulatory Commission
NDE	Nondestructive Examination
OE	Operating Experience
PDI	Performance Demonstration Initiative
PI&R	Problem Identification and Resolution
PSEG	Public Service Electric & Gas, LLC
PWSCC	Primary Water Stress Corrosion Cracking
PQR	Procedure Qualification Record (Welding Procedures)
RCS	Reactor Coolant System
RT	Badiographic Test (Badiography)
PT	Dye Penetrant Testing
SDP	Significance Determination Process
SE	Safety Evaluation

SG	Steam Generator
SI	Stress Improvement
SSC	Structure, System, and Component
TS	Technical Specifications
UT	Ultrasonic Test
UFSAR	Updated Final Safety Analysis Report
VT	Visual Examination
WPS	Weld Procedure Specification

## A-13

# INSPECTION SAMPLE COMPLETION STATUS

PROCEDURE or TI	MINIMUM REQUIRED SAMPLES Annual (A) Biennial (B)	CURRENT INSPECTION SAMPLES	RPS TOTAL SAMPLES TO DATE	PROCEDURE STATUS OPEN (O) CLOSED (C)	RPS UPDATED (Y) (N)
7111108 (G)	1				Y
2515/172	1				YES

#### Attachment B-1

#### TI 172 MSIP Documentation Questions Salem Unit 1

#### Introduction:

The Temporary Instruction (TI), 2515/172 provides for confirmation that owners of pressurized-water reactors (PWRs) have implemented the industry guidelines of the Materials Reliability Program (MRP) -139 regarding nondestructive examination and evaluation of certain dissimilar metal welds in the RCS containing nickel based Alloys 600/82/182. This TI requires documentation of specific questions in an inspection report. The questions and responses for MSIP for the IR 05000311/2009005 section 4OA5 are included in this Attachment "B-1".

In summary the Salem Units 1 and 2 have MRP-139 applicable Alloy 600/82/182 RCS welds in the four hot and four cold leg piping to reactor pressure vessel nozzle connections for each plant.

For Unit 1 during the 1R20 refueling outage in April 2010 PSEG inspected one dissimilar metal weld, a SG channel head drain line weld. No indications were reported from this inspection. PSEG plans on replacing this valve, and the dissimilar metal weld, during refueling outage 1R22.

#### TI 2515/172 requires the following questions to be answered for MRP-139 MSIP inspections:

<u>Question 1:</u> For each mechanical stress improvement used by the licensee during the Salem U1 1R20 outage, was the activity performed in accordance with a documented qualification report for stress improvement processes and in accordance with demonstrated procedures?

<u>Response Question 1</u>: No MSIP activities were conducted on U1 during 1R20.

<u>Question d.1</u>: Are the nozzle, weld, safe end, and pipe configurations, as applicable, consistent with the configuration addressed in the stress improvement (SI) qualification report?

Response – Question d.1: No MSIP activities were conducted on U1 during 1R20.

<u>Question d.2.</u>: Does the SI qualification report address the location radial loading is applied, the applied load, and the effect that plastic deformation of the pipe configuration may have on the ability to conduct volumetric examinations?

Response Question d.2: No MSIP activities were conducted on U1 during 1R20.

<u>Question d.3.</u>: Do the licensee's inspection procedure records document that a volumetric examination per the ASME Code, Section XI, Appendix VIII was performed prior to and after the application of the MSIP?

<u>Response: Question d.3.</u>: No MSIP activities were conducted on U1 during 1 R20.

<u>Question d.4.</u>: Does the SI qualification report address limiting flaw sizes that may be found during pre-SI and post-SI inspections and that any flaws identified during the volumetric examination are to be within the limiting flaw sizes established by the SI qualification report?

Response: Question d.4.: No MSIP activities were conducted on U1 during 1 R20.

<u>Question d.5.</u>: Was the MSIP performed such that deficiencies were identified, dispositioned, and resolved?

Response Question d.5.: No MSIP activities were conducted on U1 during 1 R20.

## A-15