

February 7, 2011

MEMORANDUM TO: Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager */ra/*
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2,
DRAFT REQUEST FOR ADDITIONAL INFORMATION
(TAC NOS. ME4796 AND ME4797)

The attached draft request for information (RAI) was transmitted on February 7, 2011, to Mr. Jeff Keenan of PSEG Nuclear LLC (the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's amendment request for Salem Nuclear Generating Station (Salem), Unit Nos. 1 and 2, dated October 4, 2010. The proposed amendment would revise the Technical Specification (TS) requirements for snubbers to conform to planned revisions to the inservice inspection program.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-272 and 50-311

Attachment: Draft RAI

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED LICENSE AMENDMENT

SNUBBER SURVEILLANCE REQUIREMENTS

SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-272 AND 50-311

By letter dated October 4, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102780066), PSEG Nuclear LLC (PSEG or the licensee) submitted an amendment request for Salem Nuclear Generating Station (Salem), Unit Nos. 1 and 2. The proposed amendment would revise the Technical Specification (TS) requirements for snubbers to conform to planned revisions to the inservice inspection (ISI) program.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed amendment and would like to discuss the following issues to clarify the submittal.

Background

PSEG's application dated October 4, 2010, states that for the current third 10-year ISI intervals at Salem Units 1 and 2, snubber testing and examination are performed in accordance with the specific requirements of TS 3/4.7.9 in lieu of the requirements contained in the American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code* (Code), Section XI, Article IWF-5000. The NRC previously authorized use of TS 3/4.7.9 in lieu of the ASME Code requirements pursuant to 10 CFR 50.55a(a)(3)(i) for the third 10-year ISI intervals for Salem Units 1 and 2.

The application states that for the Salem Unit 1 fourth 10-year ISI interval, beginning May 20, 2011, PSEG intends to adopt Subsection ISTD, of the ASME *Code for Operation and Maintenance of Nuclear Power Plants* (OM Code), 2004 Edition, in place of the current requirements. PSEG also intends to adopt Subsection ISTD of the OM Code, 2004 Edition, for the remainder of the Salem Unit 2 third 10-year ISI interval which ends November 27, 2013.

Request for Additional Information

1. Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(c)(3), "Surveillance requirements," states that, "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met." The proposed amendment would delete the specific requirements for demonstrating snubber operability, currently in surveillance requirement (SR) 4.7.9. A reference to "the program for examination, testing and service life monitoring for snubbers" would be added in place of the specific requirements. The proposed changes do not provide sufficient detail necessary to adequately demonstrate snubber operability. Please propose TS changes consistent with the requirements in 10 CFR 50.36(c)(3) and provide the technical evaluation supporting these changes.

2. 10 CFR 50.55a(g)(5)(ii) requires that if a revised ISI program for a facility conflicts with the TSs, the licensee shall submit a license amendment request to conform the TSs to the revised program. The licensee's application states that the proposed changes to TS 3/4.7.9 are required to conform the TSs to the revised ISI program for snubbers. However, rather than changing the specific requirements currently contained in SR 4.7.9 to conform to Subsection ISTD of the OM Code, the licensee has proposed to delete the SRs and add a reference to "the program for examination, testing and service life monitoring for snubbers."

The licensee's application dated October 4, 2010, provides no analysis of the specific changes to the snubber examination, testing and service life monitoring that would result from the revised ISI program. Since the licensee is not relocating TS 3/4.7.9 out of the TSs in its entirety (i.e., based on the criteria in 10 CFR 50.36(c)(2)), the NRC staff needs further information to adequately evaluate the actual change being made. The following additional information should be provided:

- a) Consistent with 10 CFR 50.55a(g)(5)(ii), please identify which planned revised ISI program requirements for Salem Units 1 and 2 conflict with the current requirements in SR 4.7.9.
 - b) Provide a detailed comparison of the changes that would result from the revised ISI program with respect to the visual inspection requirements (SR 4.7.9.a); visual inspection acceptance criteria (SR 4.7.9.b), functional tests (SR 4.7.9.c), hydraulic snubbers functional test acceptance criteria (SR 4.7.9.d), mechanical snubbers functional acceptance criteria (SR 4.7.9.e), snubber service life monitoring (SR 4.7.9.f), and snubber visual inspection interval requirements (Table 4.7-3). The information provided should justify why the proposed changes are sufficient to demonstrate snubber operability consistent with the requirements in 10 CFR 50.36(c)(3).
3. Please provide a copy of the document describing the snubber program for snubber examination and testing that is based on Subsection ISTD of the OM code.