



10 CFR 50.90

LR-N11-0151  
May 23, 2011

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

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

Subject: Response to Draft Request for Additional Information - License Amendment  
Request: Changes to Snubber Surveillance Requirements

- References:
1. Letter from Carl J. Fricker, PSEG Nuclear LLC, to U.S. Nuclear Regulatory Commission, "License Amendment Request: Changes to Snubber Surveillance Requirements," dated October 4, 2010 (ADAMS Accession No. ML102780066)
  2. Letter from Carl J. Fricker, PSEG Nuclear LLC, to U.S. Nuclear Regulatory Commission, "Response to Draft Request for Additional Information - License Amendment Request: Changes to Snubber Surveillance Requirements," dated April 7, 2011 (ADAMS Accession No. ML110980107)
  3. Email from R. Ennis, USNRC to PSEG, "Salem Nuclear Generating Station, Unit Nos. 1 and 2, Draft Request for Additional Information (TAC NOS. ME4796 and ME4797)," dated April 25, 2011 (ADAMS Accession No. ML111160150)

In Reference 1, as supplemented in Reference 2, PSEG Nuclear LLC (PSEG) submitted a license 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.

In Reference 3 the NRC requested additional information regarding the PSEG license amendment request. The information requested by the NRC and the PSEG response are provided in Attachment 1.

PSEG has determined that the information provided in this response does not alter the conclusions reached in the 10 CFR 50.92 no significant hazards determination previously submitted.

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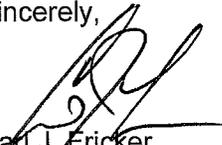
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There are no new commitments contained in this letter. If you have any questions or require additional information, please contact Paul Duke at (856) 339-1466.

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

Executed on     **MAY 23** 2011      
(date)

Sincerely,



Carl J. Fricker  
Site Vice President - Salem

Attachment (1)

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

**Response to Draft Request for Additional Information Regarding Proposed  
License Amendment - Snubber Surveillance Requirements  
Salem Nuclear Generating Station - Units 1 and 2  
NRC Docket Nos. 50-272 and 50-311**

By letter dated October 4, 2010, as supplemented on April 7, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML102780066 and ML110980107, respectively), 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.

1. Based on previous discussions with the NRC staff and in response to the NRC staff's draft RAI dated February 7, 2011 (ADAMS Accession No. ML110390175), the licensee, in its letter dated April 7, 2011, proposed to add new TS 6.8.4.m, "Snubber Testing Program," to the Administrative Controls section of the TSs. Paragraph iv in TS 6.8.4.m would read as follows:

The 120-month program updates shall be made in accordance with 10 CFR 50.55a(g)(4), 10 CFR 50.55a(g)(3)(v) and 10 CFR 50.55a(b) (including 10 CFR 50.55a(b)(3)(v)) subject to the limitations and modifications listed therein.

Since snubbers are subject to both inservice testing as well as ISI, the program update provisions in 10 CFR 50.55a(f) and 10 CFR 50.55a(g) are applicable. As such, the NRC staff suggests that the above paragraph be revised to read as follows:

The 120-month program updates shall be made in accordance with 10 CFR 50.55a (including 10 CFR 50.55a(b)(3)(v)) subject to the limitations and modifications listed therein.

**Response:**

PSEG proposes to revise paragraph iv in new TS 6.8.4.m as suggested above. The revised TS 6.8.4.m is provided below:

**6.8.4.m**      *Snubber Testing Program*

*This program conforms to the examination, testing and service life monitoring for dynamic restraints (snubbers) in accordance with 10 CFR 50.55a inservice inspection (ISI) requirements for supports. The program shall be in accordance with the following:*

- (i) *This program shall meet 10 CFR 50.55a(g) ISI requirements for supports.*
- (ii) *The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of*

*Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure (BPV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a(b) subject to limitations and modifications listed in 10 CFR 50.55a(b) and subject to Commission approval.*

- (iii) The program shall, as allowed by 10 CFR 50.55a(b)(3)(v), meet Subsection ISTA, "General Requirements" and Subsection ISTD, "Preservice and Inservice Examination and Testing of Dynamic Restraints (Snubbers) in Light-Water Reactor Nuclear Power Plants" in lieu of Section XI of the ASME BPV Code ISI requirements for snubbers, or meet authorized alternatives pursuant to 10 CFR 50.55a(a)(3).*
- (iv) The 120-month program updates shall be made in accordance with 10 CFR 50.55a (including 10 CFR 50.55a(b)(3)(v)) subject to the limitations and modifications listed therein.*

All other proposed TS changes are as stated in PSEG's letter dated April 7, 2011.