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JUN 07 2012



LR-N12-0157

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

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

Subject: Submittal of Relief Request Associated with the Fourth Ten-Year Inservice Inspection (ISI) Interval Code Edition

In accordance with 10 CFR 50.55a (76FR36232), "codes and standards," paragraph (a)(3)(i), PSEG Nuclear LLC (PSEG) hereby requests NRC approval of the attached request for the fourth 10-year ISI interval for Salem Generating Station Unit 2, beginning on November 27, 2013. PSEG is requesting that the Unit 2 ISI inspection plan be developed in accordance with the requirements of the 2004 Edition American Society of Mechanical Engineering (ASME) Boiler and Pressure Vessel Code, Section XI. This request would standardize the ASME Code edition with the current Salem Unit 1 fourth 10-year ISI interval and with the current Salem Unit 1 and Unit 2 second 10-year Containment Inservice Inspection (CISI) interval. In order to support the development of the Salem Unit 2 fourth 10-year inspection plan, PSEG is requesting approval by June 30, 2013.

There are no regulatory commitments contained within this letter. Should you have any questions concerning this matter, please contact Mr. Brian Thomas at 856-339-2022.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul R. Duke, Jr.", is written over the typed name.

Paul R. Duke, Jr.
Manager - Licensing
PSEG Nuclear LLC

Attachment: 10 CFR 50.55a Relief Request S2-I4R-123

JUN 07 2012

cc: W. Dean, Administrator, Region I, NRC
NRC Senior Resident Inspector, Salem
J. Hughey, Project Manager, Salem, USNRC
P. Mulligan, Manager IV, NJBNE
L. Marabella, Corporate Commitment Tracking Coordinator
T. Cachaza, Salem Commitment Tracking Coordinator

ATTACHMENT

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

Relief Request – S2-I4R-123

Proposed Alternative in Accordance with 10 CFR 50.55a(a)(3)(i), the proposed alternatives would provide an acceptable level of quality and safety.

1. ASME Component(s) Affected

Code Class: 1, 2, and 3 components and their supports
Examination Category: All
Item Number: All
Description: All items within the ASME Section XI
Boundaries except IWE and IWL.
Unit/Inspection
Interval Applicability: Salem Unit 2 – Fourth (4th) ISI 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 of Nuclear Power Plant Components," 2007 Edition with the 2008 Addenda.

3. Applicable Regulatory Requirements

10 CFR 50.55a(g)(4)(ii) states in part: *"Inservice examination of components and system pressure tests conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section 12 months before the start of the 120-month inspection interval (or the optional ASME Code cases listed in NRC Regulatory Guide 1.147, Revision 16, that are incorporated by reference in paragraph (b) of this section), subject to the conditions listed in paragraph (b) of this section."*

Paragraph (b)(2) states: *"As used in this section, references to Section XI refer to Section XI, Division 1, of the ASME Boiler and Pressure Vessel Code, and include the 1970 Edition through the 1976 Winter Addenda, and the 1977 Edition through the 2007 Edition with the 2008 Addenda, subject to the following conditions:"*

Salem Unit 2 will begin the fourth 120-month Inservice Inspection (ISI) interval on 11/27/2013 and is required to update the fourth interval Inservice Inspection Program to the 2007 Edition with the 2008 Addenda with the conditions of 10 CFR 50.55a(b)(2) and the additional augmented requirements of 10 CFR 50.55a(g)(6)(ii).

4. Reason for Request

On May 20, 2011, Salem Unit 1 was updated to the 2004 Edition of Section XI in accordance with the requirements of 10 CFR 50.55a(g)(4)(ii). Prior to the Unit 1 update, both units were meeting the requirements of ASME Section XI, 1998 Edition with the 2000 Addenda and the conditions of 10 CFR 50.55a(b). Additionally, on April 22, 2010, the Salem Unit 1 and 2 Containment Inservice Inspection (CISI) programs were updated to the 2004 Edition of Section XI in accordance with the requirements of 10 CFR 50.55a(g)(4)(ii).

PSEG Nuclear shares the same procedures and processes for management and implementation of the Salem Unit 1 and Unit 2 ASME Section XI programs. As a result of the recent Salem ISI and CISI interval updates, the program procedures have been expanded to address two sets of ASME Section XI requirements with the corresponding conditions of 10 CFR 50.55a(b); the 1998 with the 2000 Addenda (Salem Unit 2 current interval) and the 2004 Edition (Salem Unit 1 ISI and Salem Unit 1 and 2 CISI). If Salem Unit 2 is updated to the 2007 Edition with the 2008 Addenda in November 2013, then the requirements representing the 1998 Edition with the 2000 Addenda would be replaced with those of the 2007 Edition with the 2008 Addenda. This will continue to result in programs and common procedures implementing two different Edition/Addenda of ASME Section XI.

For licensees who operate multiple units, it has become common to standardize programs, procedures, and processes like those of ASME Section XI. This has been shown to improve performance by focusing the use to a common set of requirements that are enhanced over time through multiple unit use. Implementing the same ASME standard allows the exchange of personnel knowledge in problem resolution between units, and optimizes the performance of the activity because the same requirements and processes are used repeatedly during multiple outages by the same personnel. PSEG Nuclear, like other licensees, optimizes performance by the sharing of personnel between units and using common refueling outage teams.

5. Proposed Alternative and Basis for Use

Pursuant to 10 CFR 50.55a(a)(3)(i), PSEG Nuclear requests authorization for Salem Unit 2 to utilize the alternative requirements in the 2004 Edition of

Section XI in lieu of the requirements contained in the 2007 Edition with the 2008 Addenda. In implementing this proposal, PSEG will comply with all NRC conditions specified in 10 CFR 50.55a(b) applicable to the 2004 Edition for Section XI. Code cases will be adopted per Regulatory Guide 1.147 as required by 10 CFR 50.55a(b)(5), and selected code cases will be applicable to the 2004 Edition. This alternative does not affect implementation of the augmented requirements contained in 10 CFR 50.55a(g)(6)(ii).

Salem Unit 2 has one remaining outage in the third interval (2RFO19, Fall 2012) and will continue to meet the 1998 Edition with the 2000 Addenda until November 27, 2013.

It is acceptable to update the Salem Unit 2 ASME Section XI Program to the 2004 Edition in lieu of the 2007 Edition with the 2008 Addenda because the changes made to Section XI subsequent to the 2004 Edition were not necessary to ensure an acceptable level of quality and safety. In the latest 10 CFR 50.55a the NRC does not mandate that other plants using earlier edition and addenda as their code of record follow any of the requirements of the 2007 Edition with the 2008 Addenda. Additionally, the NRC uses 10 CFR 50.55a(g)(6)(ii) to identify augmented requirements that are believed by the NRC necessary to provide added assurance of structural reliability. This request does not affect Salem Unit 2's compliance with 10 CFR 50.55a(g)(6)(ii).

PSEG Nuclear believes that updating the Salem Unit 2 Section XI ISI program plan to the 2004 Edition to align with the Salem Unit 1 ISI program plan and the Salem Unit 1 and Unit 2 CISI program plans will improve the level of quality and safety. This improvement is achieved by creating one common set of technical and administrative requirements for personnel who develop, manage, plan, implement, report, and assess the ASME Section XI programs at Salem Unit 1 and 2.

10 CFR 50.55a(a)(3) states:

“Proposed alternatives to the requirements of paragraphs (c), (d), (e), (f), (g), and (h) of this section, or portions thereof, may be used when authorized by the Director, Office of Nuclear Reactor Regulation or Director, Office of New Reactors, as appropriate. Any proposed alternatives must be submitted and authorized prior to implementation. The applicant or licensee shall demonstrate that:

- (i) The proposed alternatives would provide an acceptable level of quality and safety, or*

- (ii) *Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.”*

As discussed in Section 5 above, the proposed alternative to update the Salem Unit 2 ASME Section XI ISI Program to the 2004 Edition in lieu of the 2007 Edition with the 2008 Addenda as required by 10 CFR 50.55a(g)(4)(ii) provides an acceptable level of quality and safety.

Therefore, PSEG Nuclear requests authorization to perform the requested alternative to the Code requirement pursuant to the provisions of 10 CFR 50.55a(a)(3)(i).

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 2 that begins November 27, 2013 and is currently scheduled to end on November 27, 2023.

7. Precedents

Request for alternatives to 10 CFR 50.55a(g)(4)(ii) to use Edition/Addenda that are earlier than the Edition/Addenda referenced in 10 CFR 50.55a(b) for successive 120 month intervals have been requested and approved for Arkansas Nuclear One (ANO) Unit 2 (References 1 and 2).

8. References

1. Request for Alternative to Use 2001 Edition Through 2003 Addenda in Lieu of the 2004 Edition, Arkansas Nuclear One, Unit 2 (ADAMS Accession Number – ML091600248)
2. Arkansas Nuclear One, Unit 2 – Request for Alternative ANO2-ISI-003 to use 2001 Edition Through 2003 Addenda in Lieu of the 2004 Edition for the Fourth 10-Year Inspection Interval (TAC No. ME1452) (ADAMS Accession Number - ML100970659)