

DEC 22 2014



LR-N14-0249

NEI 99-04

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

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

Subject: 2013 Summary of Revised Regulatory Commitments- Salem

In accordance with the Nuclear Energy Institute (NEI) process for managing Nuclear Regulatory Commission (NRC) commitments and associated NRC notifications, PSEG Nuclear LLC (PSEG) submits this correspondence to discuss commitments that were changed and not reported by other means during 2013.

The attached commitments were evaluated in accordance with the requirements of the PSEG Regulatory Commitment Change Process, which is consistent with the guidance in NEI 99-04, "Guidelines for Managing NRC Commitments."

There are no new commitments in this letter.

If there are any questions, please contact Thomas Cachaza at 856-339-5038.

Sincerely,


John F. Perry
Site Vice President – Salem

Attachments (1)

1. Summary of Changed/Closed Commitments

- C D. Lew, Administrator – Region 1(Acting)
 Ms. C. Sanders, Licensing Project Manager – Salem
 P. Finney, USNRC Senior Resident Inspector – Salem
 P. Mulligan, Manager, IV, Bureau of Nuclear Engineering
 T. Cachaza, Salem Commitment Coordinator
 L. Marabella, Corporate Commitment Coordinator

Attachment 1

Summary of Changed/Closed Commitments

	Revised Commitment Description	Justification for Change
Original Commitment: New PM Recurring Tasks (RT's) have been initiated to implement a 54 month PM to open and inspect Reactor head vent valve internals and to repair as needed. A New Maintenance Department procedure has been issued to provide guidance on the disassembly, inspection, and refurbishment of the Reactor head vent valves. These Corrective actions will be completed prior to restart of the affected unit Source Document: LR-N95196 References: CM-U2-1995-008 70151899 Date of Change: 03/11/2013	Deleted	The Reactor Head Vent valves at Salem unit 1 and 2 are 3/4- inch Target Rock direct acting solenoid valves which have a safety function to be manually opened from the Main Control Room during a LOCA to vent non-condensable gasses from the reactor vessel to allow natural recirculation. The valves also have a safety function to close to maintain RCS integrity. These valves are listed as non-critical, low duty cycle and severe service conditions per the PMI tool (Classification 6). Per the PCM templates for this classification there is no internal inspection PM required. The valves have a stroke time test performed every outage IAW S1 (2).OP-ST.PZR-0003. The stroke time test ensures that these valves are cable of opening to perform their safety function to open to vent non-condensable gasses if required during a LOCA, Movement is verified during this outage testing by verifying PRT level increase. Leakage thru these valves can be detected during power operations by monitoring PRT level. Control room position indication is provided on these valves. The intention of this commitment change is to remove the 54 month commitment to open and inspect these valves and to perform this internal inspection either on condition or at a frequency determined by internal and external operating experience. In addition to this open and inspect PM, there are two other environmentally qualified PMs (EQPM) performed on these valves to replace the relays and to replace the O-Ring. An

		internal valve inspection is not required to perform these EQPMs and these PMs will remain in place. These valves have been opened and inspected at least 16 times (2 times for each valve) since the original commitment and there has been no documented internal issue with the valves. There has been no indication of boric acid build-up on the seating surface which was the original suspected cause for the failure in 1994. The original root cause of this failure was inconclusive. Disassembly of the valves indicated steam cutting which was the cause for leakage, but found no cause for the failure to stroke. An OE search was performed for reactor head vent valve and Target rock solenoid valve failures. The majority of failures were caused by position indication issues which do not require an internal valve inspection to correct. Other OE failures to stroke and failed LLRT have been attributed to foreign material internal to the valve seat, which is sometimes corrected by flushing. Based on the previous inspections which have not found any internal valve issues or foreign material, the redundancy of the valves and the alternate methods for determining the condition of these valves, it is safe to remove this commitment to perform internal inspections every 54 months. The other electrical and EQ PMs will continue to be performed at their current frequencies.
Original Commitment:	Submit an updated seismic walk down report	Commitment CM.U1.2012-866 was included in

Submit an updated seismic walkdown report for Salem Unit 1. Within 90 days following restart from Salem Unit 1 Refueling Outage 22, scheduled for Spring 2013. Source Document: LR-N12-0372 References: CM-U1-2012-866 70138628 Date of Change: 08/20/2013	for Salem Unit 1. By December 31, 2013 or by an alternative date specified in future NRC correspondence regarding Fukushima Near Term Task Force Recommendation 2.3 Seismic.	the original SGS seismic walk down submittal (Reference 1) because some of the Salem Unit 1 components and areas selected for walk downs were inaccessible during power operations, and those walk downs were therefore deferred to the S1 R22 refueling outage. The commitment milestone to submit the report within 90 days of restart from 1R22 results in a due date of 8/26/13, based on a Breaker closure date of 5/2/13. The proposed commitment change to extend the submittal date is based on information received from the NRC staff during a 8/15/13 public meeting and an 8/19/13 telephone conversation between PSEG (P. Duke, Manager Licensing, G. Ruf, Fukushima Response Engineering Manager, and W. McTigue, Fukushima Response Licensing) and the NRC staff (J. Hughey, Licensing Project Manager - PSEG, and L. Regner, Sr. Project Manager NRRJLD). The NRC is in the process of developing specific questions and guidance to address generic issues that they have identified during seismic walk down audits and reviews of docketed walk down submittals. During the 8/19/13 conference call, PSEG explained that our commitment to submit a Salem Unit 1 report update by 8/26/13 would likely result in multiple submittals of the walk down report information unless we defer the submittal until after the new NRC information requests are received. The NRC concurred, and suggested that we set a target date of the end of calendar year 2013, with a caveat that generic communications may result in an
---	---	--

		earlier submittal. This commitment date change would avoid repeated management reviews and re-submittal of the extensive (greater than 600 pages) Unit 1 walk down report. It would also allow for a common Salem 1 and 2 submittal to address any generic NRC issues (Salem 2 is not affected by the commitment, but will likely be affected by the generic NRC request). The proposed change would therefore improve efficiency of PSEG and NRC resources, by ensuring that emerging NRC issues regarding seismic walk down reports are addressed prior to completing and submitting the 'final report revision.
Original Commitment: PSEG will implement a formal training program for all the mechanical and electrical maintenance, quality control, and operating personnel, including supervisors, who will be responsible for the maintenance and availability of the diesel generators through a procedurally controlled process. Source Document: SER Supplement 5, Section 8.3.4 Diesel Generator Reliability, training [In response to NUREG/CR-0660, "Enhancement of Onsite Emergency Diesel Generator Reliability"] References: CM-SC-1981-28 70133076 LR-N09-0103 Date of Change: 01/25/2013	PSEG provided an "initial" complete formal training and a qualification program for Emergency Diesel Generator (EDG) maintenance for applicable personnel who work on and supervise EDG maintenance. Continuing (future) training will be decided using the systems approach to training IAW 10CFR50.120 and the training process description. Continuing (future) training for quality control personnel will be determined by management personnel responsible for the quality control function and implemented through a procedurally controlled process.	The training provided to quality control personnel is based on current industry practices. The commitment was forcing quality control personnel to attend training to learn how a diesel generator is torn apart and put back together, which does not improve on their ability to perform basic QV inspections, e.g., to examine worker procedure adherence, verify component cleanliness, and ensure quality of workmanship. Quality control training must provide the skills necessary for the "type" of inspections they are certified for regardless of the component they are inspecting, whether it is a diesel engine, a valve, or a pump, etc. For example, a welding inspection on a diesel takes no different skills than a welding inspection on a charging pump. For these fundamental reasons, it is appropriate to change the commitment.