

Public Service  
Electric and Gas  
Company

**Steven E. Miltenberger**

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-4199

Vice President and Chief Nuclear Officer

July 21, 1988  
NLR-N87232

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Gentlemen:

INSERVICE INSPECTION PROGRAM RELIEF REQUESTS AND  
ASME SECTION XI CODE CASE APPLICATIONS  
SALEM GENERATING STATION  
UNIT NOS. 1 AND 2  
DOCKET NOS. 50-272 AND 50-311  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354

Recent Inservice Inspection (ISI) Program submittals for Salem Unit 1 and Hope Creek incorporate the requirements of the 1983 Edition of Section XI, Division 1 of the ASME Boiler and Pressure Vessel Code with addenda through the Summer 1983 Addenda. Under the 1983 Edition of ASME Section XI, the use of Form NIS-2 for repairs or replacements becomes mandatory. Additionally, those NIS-2 forms which are generated for the repair or replacement of ASME Code Class 1 and 2 pressure retaining components and their supports must be included in the inservice inspection summary report that must be filed within 90 days of completion of inservice inspections conducted during a refueling outage. The use of Form NIS-2 was not required under the earlier editions of ASME Section XI to which Salem and Hope Creek were previously committed.

Presently, PSE&G possesses a National Board of Boiler and Pressure Vessel Inspectors (National Board) "NR" Certificate of Authorization, which is required by New Jersey state law (New Jersey Administrative Code 12:90). In accordance with the National Board Inspection Code and New Jersey state requirements, all repairs and replacements performed under the NR Certificate of Authorization must be done under the provisions of ASME Section XI and must be documented on the National Board Form NR-1.

8808020054 880721  
PDR ADDCK 05000272  
Q PDC

A047 w/check  
11 1150  
# 2157

PSE&G requests relief from the Section XI requirement to use the NIS-2 form and proposes the use of National Board Form NR-1 to document repairs and replacements performed under the provisions of ASME Section XI. These NR-1 forms would be used in the generation of the inservice inspection summary reports. To generate both documents is essentially a duplication of effort, and creates the possibility of inconsistencies between two forms that would be describing the same repair/replacement. Both forms require the involvement and subsequently the signature of an Authorized Nuclear Inspector. Both forms require certification by the Owner, by signature, that work has met the requirements of the ASME Code. In addition, unlike Form NIS-2, a copy of Form NR-1 must be submitted upon completion to the National Board and to the State of New Jersey. Copies of the NR-1 and NIS-2 forms are attached for your review.

Related to this matter, PSE&G intends to employ ASME Section XI Code Case N-389 for Salem Unit 2. This NRC approved code case (see NRC Reg. Guide 1.147, Rev. 5, 8/86) permits repairs and replacements to be made to later Editions/Addenda of ASME Section XI than that specified in the Inservice Inspection Program. In accordance with NRC Regulatory Guide 1.147, PSE&G is providing formal notification to NRC, via this letter, of our intention to use ASME Section XI Code Case N-389. In particular, with the exception of preservice inspection requirements, PSE&G will use the repair and replacement rules of the 1983 Edition of ASME Section XI through the Summer 1983 Addenda in its employment of N-389 for the Salem Unit 2 ISI Program. Preservice and inservice inspections will continue to meet the requirements of the 1974 Edition of ASME Section XI through Summer 1975 Addenda.

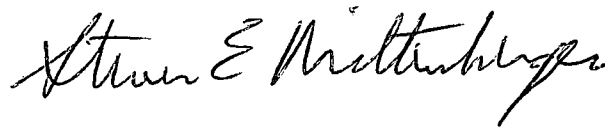
With NRC approval of the relief request noted above and the subsequent employment of ASME Section XI Code Case N-389 for Salem Unit 2, the Salem Unit 1, Salem Unit 2 and Hope Creek ISI programs will all use Form NR-1 in lieu of ASME Form NIS-2.

Additionally, PSE&G requests NRC approval for the use of ASME Section XI, Division 1 Code Cases N-448, "Qualification of VT-2 and VT-3 Visual Examination Personnel" and N-449, "Qualification of VT-4 Visual Examination Personnel" dated July 27, 1987 and Code Case N-356, "Certification Period for Level III NDE Personnel" dated July 16, 1982. Code Cases N-448 and N-449 indicate that personnel performing VT-2, VT-3 and VT-4 visual examinations may be qualified in accordance with ASME Section XI, Articles IWA-2300 (a) and (b) in lieu of IWA-2300 (c). Code Case N-356 indicates that the certification period for Level III NDE personnel may be extended to five years. PSE&G concurs with these assessments and believes that the use of these code cases would provide an acceptable level of quality and safety.

In accordance with the requirements of 10CFR170.21, a check in the amount of \$150.00 is enclosed.

Should you have any questions regarding this transmittal, please do not hesitate to contact us. Your attention to these matters is appreciated.

Sincerely,



Attachments

C Mr. G. W. Rivenbark  
USNRC Licensing Project Manager - Hope Creek

Mr. G. W. Meyer  
USNRC Senior Resident Inspector - Hope Creek

Mr. D. C. Fischer  
USNRC Licensing Project Manager - Salem

Mr. R. W. Borchardt  
USNRC Senior Resident Inspector - Salem

Mr. W. T. Russell, Administrator  
USNRC Region I

Mr. D. M. Scott, Chief  
Bureau of Nuclear Engineering  
Department of Environmental Protection  
380 Scotch Road  
Trenton, NJ 08628













