Public Service
Electric and Gas
Company

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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.

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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

FORM NIS-2 OWNER'S REPORT FOR REPAIRS OR REPLACEMENTS
As Required by the Provisions of the ASME Code Section XI

1. Owner _____ Name Date _____

_____ Address Sheet _____ of _____

2. Plant _____ Name Unit _____

_____ Address _____ Repair Organization P.O. No., Job No., etc.

3. Work Performed by _____ Name Type Code Symbol Stamp _____

_____ Address Authorization No. _____

Expiration Date _____

4. Identification of System _____

5. (a) Applicable Construction Code _____ 19____ Edition _____ Addenda _____ Code Case
(b) Applicable Edition of Section XI Utilized for Repairs or Replacements 19____

6. Identification of Components Repaired or Replaced and Replacement Components

Name of Component	Name of Manufacturer	Manufacturer's Serial No.	National Board No.	Other Identification	Year Built	Repaired, Replaced, or Replacement	ASME Code Stamped (Yes or No)

7. Description of Work _____

8. Tests Conducted: Hydrostatic ☐ Pneumatic ☐ Nominal Operating Pressure ☐
Other ☐ Pressure _____ psi Test Temp. _____ °F

NOTE: Supplemental sheets in form of lists, sketches, or drawings may be used, provided (1) size is 8½ in. x 11 in., (2) information in items 1 through 6 on this report is included on each sheet, and (3) each sheet is numbered and the number of sheets is recorded at the top of this form.

This Form (E00030) may be obtained from the Order Dept., ASME, 345 E. 47th St., New York, N.Y. 10017

SAMPLE

FORM NIS-2 (Back)

9. Remarks _____

Applicable Manufacturer's Data Reports to be attached

_____

_____

_____

CERTIFICATE OF COMPLIANCE

We certify that the statements made in the report are correct and this _____ conforms to the rules of the ASME Code, Section XI.
repair or replacement

Type Code Symbol Stamp _____

Certificate of Authorization No. _____ Expiration Date _____

Signed _____ Date _____, 19 _____
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the components described in this Owner's Report during the period _____ to _____, and state that to the best of my knowledge and belief, the Owner has performed examinations and taken corrective measures described in this Owner's Report in accordance with the requirements of the ASME Code, Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the examinations and corrective measures described in this Owner's Report. Furthermore, neither the Inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

_____ Commissions _____
Inspector's Signature — National Board, State, Province, and Endorsements

Date _____ 19 _____

SAMPLE

FORM NR-1 REPORT OF REPAIR ☐ MODIFICATION ☐ OR INSTALLATION OF REPLACEMENT(S) ☐ TO NUCLEAR COMPONENTS AND SYSTEMS IN NUCLEAR POWER PLANTS

1. Work performed by _____ (name) _____ (repair organization's P.O. no., job no., etc.)

   _____ (address)

2. Owner _____ (name)

   _____ (address)

3. Name, address and identification of nuclear power plant _____

4. Identification of system _____

5. a: Identification of component repaired, modified or replaced _____

   b: Name of manufacturer _____

   c: Identifying nos. _____ (mfr.'s serial no.) _____ (Nat'l. Bd. no.) _____ (jurisdictional no.) _____ (other) _____ (year built)

6. Applicable section(s) _____ of ASME Code, 19____ edition _____ addenda _____ Code Case _____

7. Design responsibilities _____

8. Tests conducted: hydrostatic ☐ pneumatic ☐ design pressure ☐ pressure _____ psi.

9. Description of work _____ (use of additional sheet(s) or sketch(es) is acceptable if properly identified)

10. **Remarks:** _____

CERTIFICATE OF COMPLIANCE

We certify that the statements made in this report are correct and that all design, material and workmanship on this _____ (repair, modification or replacement) conforms to the applicable section of the ASME Code.

Certificate of Authorization no. _____ to use the "NR" stamp expires _____ 19____.

Signed _____ (repair organization) _____ (authorized representative) _____ (title) _____, 19____ (date)

CERTIFICATE OF INSPECTION

I, the undersigned, holding a valid commission issued by The National Board of Boiler and Pressure Vessel Inspectors, and certificate of competency issued by the state or province of _____ and employed by _____ of _____ have inspected the repair, modification or replacement described in this report on _____, 19____ and state that to the best of my knowledge and belief, this repair, modification or replacement has been made or constructed in accordance with Section XI and Section III of the ASME Code and the National Board rules as defined in the publications NB-65 and NB-102, current editions. By signing this certificate, neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the repair, modification or replacement described in this report. Furthermore, neither the Inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

Date _____, 19____ Signed _____ (Authorized Inspector) Commissions _____ (Nat'l. Bd. no. (including endorsements) state or province and number)

This form may be obtained from The National Board of Boiler and Pressure Vessel Inspectors, 1055 Crupper Ave., Columbus, OH 43229

FORM NIS-2 OWNER'S REPORT FOR REPAIRS OR REPLACEMENTS
As Required by the Provisions of the ASME Code Section XI

1. Owner _____ Name Date _____

   _____ Address Sheet _____ of _____

2. Plant _____ Name Unit _____

   _____ Address _____ Repair Organization P.O. No., Job No., etc.

3. Work Performed by _____ Name Type Code Symbol Stamp _____

   _____ Address Authorization No. _____

   Expiration Date _____

4. Identification of System _____

5. (a) Applicable Construction Code _____ 19____ Edition _____ Addenda, _____ Code Case

   (b) Applicable Edition of Section XI Utilized for Repairs or Replacements 19____

6. Identification of Components Repaired or Replaced and Replacement Components

Name of Component	Name of Manufacturer	Manufacturer Serial No.	National Board No.	Other Identification	Year Built	Repaired, Replaced, or Replacement	ASME Code Stamped (Yes or No)

7. Description of Work _____

8. Tests Conducted: Hydrostatic ☐ Pneumatic ☐ Nominal Operating Pressure ☐
   Other ☐ Pressure _____ psi Test Temp. _____ °F

NOTE: Supplemental sheets in form of lists, sketches, or drawings may be used, provided (1) size is 8½ in. x 11 in., (2) information in items 1 through 6 on this report is included on each sheet, and (3) each sheet is numbered and the number of sheets is recorded at the top of this form.

This Form (E00030) may be obtained from the Order Dept., ASME, 345 E. 47th St., New York, N.Y. 10017

SAMPLE

FORM NIS-2 (Back)

9. Remarks _____

Applicable Manufacturer's Data Reports to be attached

_____

_____

_____

CERTIFICATE OF COMPLIANCE

We certify that the statements made in the report are correct and this _____ conforms to the rules of the ASME Code, Section XI.

repair or replacement

Type Code Symbol Stamp _____

Certificate of Authorization No. _____ Expiration Date _____

Signed _____ Date _____, 19 _____

Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the components described in this Owner's Report during the period _____ to _____, and state that to the best of my knowledge and belief, the Owner has performed examinations and taken corrective measures described in this Owner's Report in accordance with the requirements of the ASME Code, Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the examinations and corrective measures described in this Owner's Report. Furthermore, neither the Inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

_____ Commissions _____

Inspector's Signature — National Board, State, Province, and Endorsements

Date _____ 19 _____

SAMPLE

FORM NR-1 REPORT OF REPAIR ☐ MODIFICATION ☐ OR INSTALLATION OF REPLACEMENT(S) ☐ TO NUCLEAR COMPONENTS AND SYSTEMS IN NUCLEAR POWER PLANTS

1. Work performed by _____ (name) _____ (repair organization's P.O. no., job no., etc.)

   _____ (address)

2. Owner _____ (name)

   _____ (address)

3. Name, address and identification of nuclear power plant _____

4. Identification of system _____

5. a: Identification of component repaired, modified or replaced _____

   b: Name of manufacturer _____

   c: Identifying nos. _____ (mfr.'s serial no.) _____ (Nat'l. Bd. no.) _____ (jurisdictional no.) _____ (other) _____ (year built)

6. Applicable section(s) _____ of ASME Code, 19____ edition _____ addenda _____ Code Case _____

7. Design responsibilities _____

8. Tests conducted: hydrostatic ☐ pneumatic ☐ design pressure ☐ pressure _____ psi.

9. Description of work _____ (use of additional sheet(s) or sketch(es) is acceptable if properly identified)

10. **Remarks:** _____

CERTIFICATE OF COMPLIANCE

We certify that the statements made in this report are correct and that all design, material and workmanship on this _____ (repair, modification or replacement) conforms to the applicable section of the ASME Code.

Certificate of Authorization no. _____ to use the "NR" stamp expires _____ 19____.

Signed _____ (repair organization) _____ (authorized representative) _____ (title) _____, 19____ (date)

CERTIFICATE OF INSPECTION

I, the undersigned, holding a valid commission issued by The National Board of Boiler and Pressure Vessel Inspectors, and certificate of competency issued by the state or province of _____ and employed by _____ of _____ have inspected the repair, modification or replacement described in this report on _____, 19____ and state that to the best of my knowledge and belief, this repair, modification or replacement has been made or constructed in accordance with Section XI and Section III of the ASME Code and the National Board rules as defined in the publications NB-65 and NB-102, current editions. By signing this certificate, neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the repair, modification or replacement described in this report. Furthermore, neither the Inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

Date _____, 19____ Signed _____ (Authorized Inspector) Commissions _____ (Nat'l. Bd. no. (including endorsements) state or province and number)

This form may be obtained from The National Board of Boiler and Pressure Vessel Inspectors, 1055 Crupper Ave., Columbus, OH 43229