Public Service
Electric and Gas
Company

Steven E. Miltenberger
Vice President and Chief Nuclear Officer

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

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NLR-N88190

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

Gentlemen:

RESUBMITTAL OF INSERVICE INSPECTION PROGRAM RELIEF REQUEST
SALEM GENERATING STATION
UNIT NO. 1
DOCKET NO. 50-272

On June 6, 1988, Public Service Electric and Gas Company (PSE&G) submitted a request for relief from the requirements of ASME Section XI regarding the 10-year hydrostatic testing of buried piping in the Salem Unit 1 Auxiliary Feedwater System. In an effort to begin NRC staff review of this relief request, Mr. J. Stone, the NRR Project Manager for Salem Generating Station, informed us that a page from the Attachment to the June 6, 1988 letter was not received by the NRC Docket Room. We apologize for any inconvenience this may have caused. Another copy of the attachment is enclosed with this letter.

A check in the amount of $150.00 was submitted with the June 6, 1988 letter in accordance with the requirements of 10CFR170.21.

If you have any questions with regard to this relief request, please do not hesitate to contact us.

Sincerely,

Steven E Miltenberger

Attachment

A047
1/1

C Mr. J. C. Stone
Licensing Project Manager

Ms. K. Halvey Gibson, Acting
Senior Resident Inspector

Mr. W. T. Russell, Administrator
Region I

Ms. J. Moon, Interim Chief
New Jersey Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

ATTACHMENT

ASME SECTION XI RELIEF REQUEST FROM 10 YEAR HYDROSTATIC TEST REQUIREMENTS FOR BURIED PIPING IN THE AUXILIARY FEEDWATER SYSTEM

ASME SECTION XI EXAMINATION REQUIREMENT - 1974 Edition through Summer 1975 Addenda.

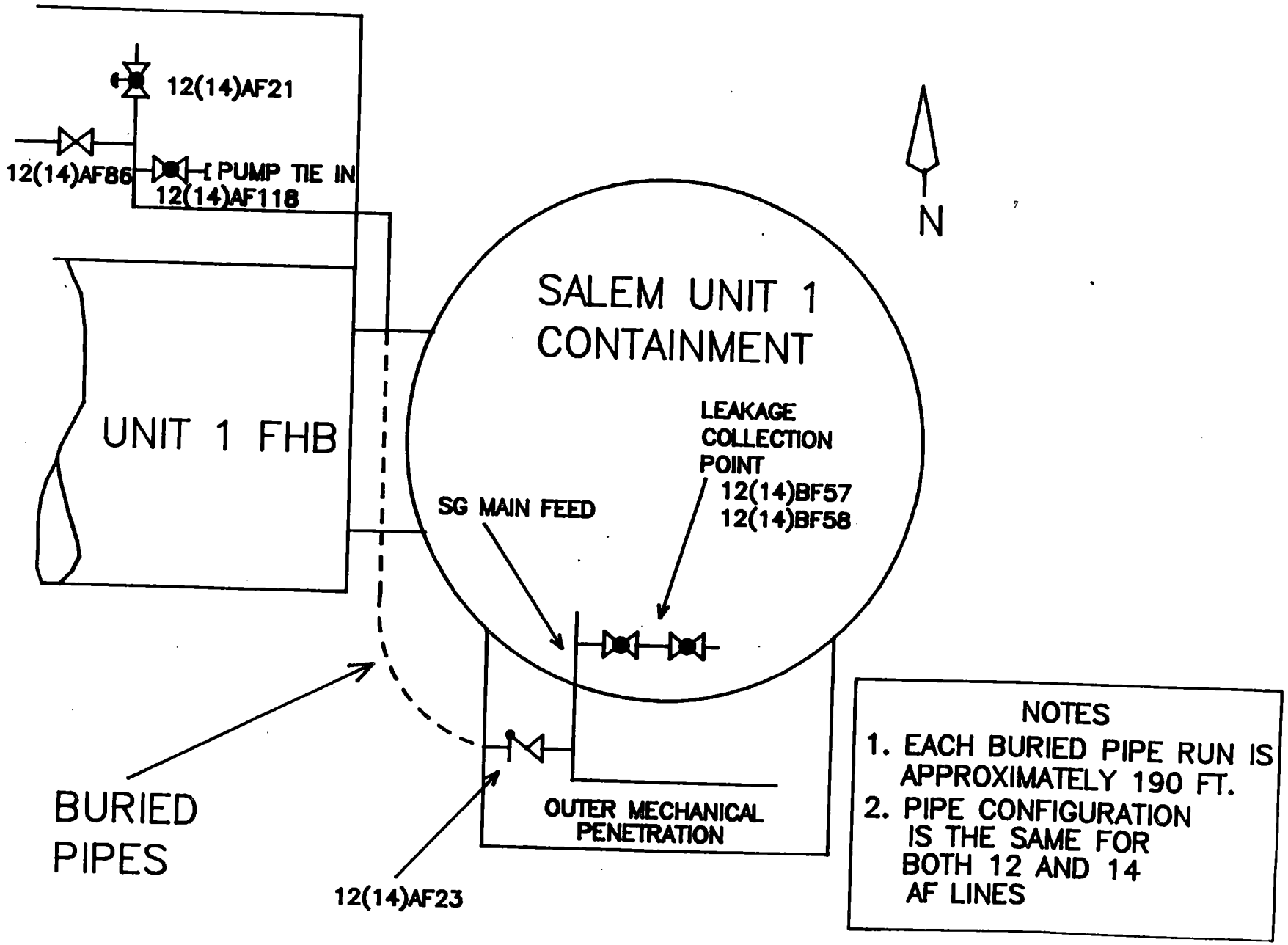
Article IWD - 2600(b) - In the case of buried components (e.g., underground piping), valves shall be provided to permit isolation of the buried portions of piping for the purpose of conducting a system pressure test in lieu of the visual examination. A loss of system pressure during the test shall constitute evidence of component leakage.

ALTERNATE EXAMINATION PROPOSAL - PSE&G conducted a pressure test of buried piping between valves 12AF23, 12AF21 and 12AF86 for Steam Generator #12 and 14AF23, 14AF21 and 14AF86 for Steam Generators #14 (see attached sketch) using the following alternate test method. The header was pressurized to the required hydrostatic test pressure and header pressure was maintained with the hydrostatic test pump. While the pressure was maintained, and for the duration of the test, both the volume of water used by the pump and that collected downstream of the leaking test boundary valves 12AF23 and 14AF23 were measured. The two measured volumes were then compared to provide assurance that the inaccessible portion of the pipe had no identified leakage. The buried pipe in each case was approximately 190 feet in length.

REASON FOR RELIEF REQUEST

1. The buried piping was initially tested by a pressure drop test using boundary valves as prescribed in the Code. The pressure drop test failed because of excessive leakage through the test boundary. The leakage was suspected to be past the 12AF23 and 14AF23 valves. In order to substantiate this suspected leakage path, the alternate test method described above was used. Relief is being requested as the Code does not provide for an alternate method of testing inaccessible pipe.

2. This matter was considered unresolved (Unresolved Item 272/87-32-01) in the routine Resident Safety Inspection performed between November 3, 1987 to November 30, 1987 (NRC Combined Inspection Report 50-272/87-32 and 50-311/87-33). The inspector found the alternate test method to be a reasonable alternative to the pressure drop test since the boundary valves could not be made leak tight. The inspector also requested that a relief request be submitted to acquire a formal approval for the use of the alternate test method.


12(14)AF21
12(14)AF86
PUMP TIE IN
12(14)AF118
N
SALEM UNIT 1
CONTAINMENT
UNIT 1 FHB
LEAKAGE
COLLECTION
POINT
12(14)BF57
12(14)BF58
SG MAIN FEED
BUIRED
PIPES
OUTER MECHANICAL
PENETRATION
12(14)AF23
NOTES
1. EACH BURIED PIPE RUN IS APPROXIMATELY 190 FT.
2. PIPE CONFIGURATION IS THE SAME FOR BOTH 12 AND 14 AF LINES