

Public Service
Electric and Gas
Company

Stanley LaBruna

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-4800

Vice President - Nuclear Operations

JAN 11 1990
NLR-N90011

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

Gentlemen:

REVISION TO ATTACHMENT 1 OF RESPONSE TO
NRC GENERIC LETTER NO. 89-04
SALEM GENERATING STATION
UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

Public Service Electric and Gas Company (PSE&G) hereby submits a revision to Attachment 1 of our revised response to Generic Letter 89-04 dated December 21, 1989 (ref: NLR-N89240). Position 5 on page 2 of Attachment 1 states "Any procedural revisions brought about by design value changes or by the addition/deletion of any valves will be incorporated by January 15, 1990 (which corresponds to the current test frequency)". We request that the January 15, 1990 date be changed to read February 15, 1990. All appropriate procedures have been revised; however, since they must be technically reviewed by the Operations Department and approved by the Station Operations Review Committee (SORC) it is felt that the February 15, 1990 dated is more appropriate.

The need for this additional extension request is two-fold;
a) the In-Service Inspection program is in the process of being transferred to the Salem Technical Department from In-Service Testing Group and b) the upcoming NRC inspection on Salem Emergency Operating Procedures (EOPs) which has delayed the required operations review.

Should you have any questions with regard to this submittal, we will be pleased to discuss them with you.

Sincerely,



Attachment

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C Mr. J. C. Stone
Licensing Project Manager

Mr. T. Johnson
Senior Resident Inspector

Mr. W. T. Russell, Administrator
Region I

Mr. Kent Tosch, Chief
New Jersey Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

Position 4 - PRESSURE ISOLATION VALVE TESTING

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The pressure isolation valves (PIV's) at Salem Generating Station units are identified in each plant's Technical Specifications (TS) along with their maximum allowable leakage. The IST Program was reviewed to ensure that all of these valves, and their associated allowable leakage values, are included in its scope. Additionally, the test procedures for these valves were reviewed to assure that the valves were being individually tested as required.

Position 5 - LIMITING VALUES OF FULL-STROKE TIMES FOR POWER OPERATED VALVES

The Code intent, with respect to measuring the full-stroke times of power operated valves is to detect valve degradation. PSE&G's Salem Generating Station presently complies fully with ASME Section XI, subsection IWV, regarding limiting stroke time values for power operated valves and required corrective actions. Presently, if the stroke time increases by the code specified amount from the previous stroke time, the test frequency is increased to once per month (if the testing in that operating mode is possible) until corrective action can be taken. At Salem Station, the 4.0.5(V) - Maintenance Procedure controls the monthly testing requirements and issuance of work requests for corrective actions.

Because, as the Generic Letter states, "The code does not provide any requirements or guidelines for establishing these limits nor does it identify the relationship that should exist between these limits and any limits identified for the relevant valves in the plant TS or safety analysis", we have reviewed the licensing and/or design bases for each power operated valve in our program and taken the following position:

- 1) All valves have been reviewed and provided with a "design basis or licensing value" for declaring valve operability (sources are Technical Specifications, UFSAR, Manufacturer, NSSS Vendor, etc.).
- 2) The standard code requirements of IWV-3413(a) and IWV-3417(b) will continue to be followed by comparing previous valve stroke times with present stroke time and taking the appropriate actions.
- 3) PSE&G continues to follow industry efforts and is presently reviewing our 4.0.5 (V) Programs for changes that will enhance our trending capabilities for power operated valves.

In summary, for each power operated valve in our program, a "design value" for determining operability has been established and if that value is exceeded that valve or its associated system will be declared inoperable in accordance with the Technical Specifications. Any procedural revisions brought about by design value changes or by the addition/deletion of any valves will be incorporated by February 15, 1990, (which corresponds to the current test frequency).

Based upon their review of our current 4.0.5 (V) Program techniques, an IST task team (comprised of a Central Preventative Maintenance Group and Technical Department personnel from each station) will detail improvements in IST testing, trending and tracking by March 31, 1990. These improvements will be implemented in accordance with existing Reliability Centered Maintenance methodology.