Public Service Electric and Gas Company

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

Gentlemen:

INSERVICE INSPECTION - LONG TERM PLAN FINAL RELIEF REQUESTS - FIRST INTERVAL SALEM GENERATING STATION UNIT NO. 2 DOCKET NO. 50-311

In accordance with 10CFR50.55a(q)5, Public Service Electric & Gas Company (PSE&G) hereby submits the final relief requests of the Salem Unit 2 ISI Long Term Plan for the first inspection interval. These relief requests address examinations that were not performed or completed in their entirety during the interval. The examinations were not performed due to component restrictions, ALARA concerns, or NRC approved changes to subsequent editions of ASME Section XI Boiler and Pressure Vessel Code which deleted certain requirements.

Enclosure 1 contains five final relief requests for the first inspection interval. These relief requests detail which component examinations were not completed and the basis for not performing the examinations.

The component restrictions listed in the final relief requests have been reviewed and appropriate actions taken for submittal of the Salem Unit 2 ISI Long Term Plan for the second inspection interval.

Should there be any questions with regard to this submittal, please do not hesitate to contact us.

Sincerely, Naskana

Enclosure (1)

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COMPONENT DESCRIPTION:

Pressure vessels, components, and piping welds and integrally welded attachments subject to surface and/or volumetric examination.

ASME CODE CLASS:

ASME Section XI Class 1, 2 welds.

ASME EXAMINATION REQUIREMENTS:

In accordance with the examination requirements of Subsection IWB, Table IWB-2500 of examination categories: B-B, B-D, B-F, B-J and B-K-1 and Subsection IWB, Table IWC-2520 examination categories: C-A, C-C, C-E-1, C-F and C-G when an examination (surface or volumetric) is performed, essentially 100% of the weld length is required to be inspected.

BASIS FOR RELIEF:

The ASME Code requires surface and volumetric examination of various Class 1 vessel and piping welds as defined in Paragraph IWB-2500 and various Class 2 vessel and piping welds as defined in Paragraph IWC-2500.

During the inservice examinations performed at SALEM NUCLEAR GENERATING STATION UNIT 2 it has been the position of PUBLIC SERVICE ELECTRIC AND GAS COMPANY that examinations which could not be performed completely, (i.e., performed from two (2) directions because of component configuration or restrictions from permanent structures) the examination would be performed to the greatest extent possible and whatever limitation that existed be documented.

It has also been PUBLIC SERVICE ELECTRIC AND GAS COMPANY's position that when there was a "removable" structure, (i.e., hanger, support) these items were removed, when practical, providing greater access to the component being examined. The basis for this position is as follows:

The Code of Federal Regulations, 10CFR50, "Domestic Licensing of Production and Utilization Facilities" defines those requirements which must be adhered to by the utility in order to be issued and maintain an operating license. This document states in Paragraph 55a(g) that inservice inspections shall meet the requirements of the ASME Boiler & Pressure Vessel Code.

Throughout 10CFR50 numerous references are made allowing performance of these inspections "to the extent practical".

Some of the specific paragraphs are:

Paragraph 50.55a(g)4 states that throughout the service life of a nuclear power facility components which are classified as ASME Code Class 1, 2 and 3 shall meet the requirements of Section XI of the ASME B&PV Code, "to the extent practical within the limitations of design, geometry and materials of construction of the components".

Paragraph 50.55a(2)i of this document states that inspection of systems and components is performed "to the maximum extent practical, in accordance with generally recognized codes and standards" i.e., ASME Boiler & Pressure Code.

Paragraph 50.55g(1) states that components (including supports) shall meet the requirements of (ASME Code) "to the extent practical".

The ASME Code itself provides allowance for "limited" examinations. The 1986 Edition, Section V, Article 4, Paragraph T-441.3.2.4 states: "Whenever feasible, the scanning of the examination volume shall be carried out from both sides of the weld on the same surface. Where configuration of adjacent parts of the component are such that the scanning from both sides is not feasible, this fact shall be included in the report of the examination".

PUBLIC SERVICE ELECTRIC AND GAS COMPANY has utilized approved technical procedures written in accordance with the applicable Section/Paragraph of the ASME Code in regard to the area/volume to be examined and the specified requirements of the examination for the 1st inspection interval. Recognizing that because of component design, construction, etc. there are cases when examinations can only be performed "to the greatest extent possible". PUBLIC SERVICE ELECTRIC & GAS has already submitted a list of those identified limitations after performing the preservice examination. This relief request is submitted in addition to the original preservice examination list to identify limitations found while performing scheduled examinations for the 1st inspection interval.

ALTERNATIVE EXAMINATION:

Weld selection for this interval was made to minimize known limitations identified during preservice examination (PSI). For limitations found during the 1st inservice inspection interval, additional components were scheduled and examined, when possible, to meet the allocation table requirements of ASME Section XI 1974 Edition, Summer 75 Addenda. Below is a listing by Category of all limitations found during the inspection interval and alternate exams performed, if any.

PSE&G requested and received approval for use of ASME Code Case N-460 in February, 1990 allowing a reduction of examination coverage not to exceed 10% of the required volume. Utilizing that acceptance criteria, some of the exams listed below would no longer be considered limitations requiring relief requests.

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<u>sum #</u>	<u>CLS</u>	CAT	<u>ITEM</u>	EXAM	TYPE	LIMITATION	BASIS	ALT ·
010100	1 ·	B-B	B2.1	2-PZR-CIRC-LHA Lower head to shell A	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 80.1 % of code required volume in at least 1 direction.	Close proximity of insulation support bracket limits effective examination of code required volume.	None
010700	1	B-B	B2.1	2-PZR-CIRC-BC Shell B to Shell C	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 93.6% of code volume examined in at least 1 direction.	Permanently welded insulation supports limits effective examination of code volume.	None
010800	1	B-B	B2.1	2-PZR-CIRC-CD Shell C to Shell D	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 95.2% of code volume examined in at least 1 direction.	Permanently welded insulation supports limits effective examination of code volume.	None
002700	1	B-C	B1.3	29-STG-1240-IRS Inlet nozzle IRS	VOL	Complete volumetric examination not obtained.	Inspection limited due to permanently welded insulation support.	None
002800	1	B-C	B1.3	2-RPVCH-6446A Head to flange	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 100 % of code required volume in at least 1 direction.	Flange configuration limits examination of the code required volume.	None
020600	1	B-D	B3.2	31-STG-1240-IRS Outlet nozzle IRS	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 85.0 % of code required volume in at least 1 direction.	Close proximity of insulation support bracket limits effective examination of code required volume.	None
020900	1	B-D	B3.2	31-STG-1210-IRS Outlet nozzle IRS	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 79.0 % of code required volume in at least 1 direction.	Close proximity of insulation support bracket limits effective examination of code required volume.	None
021000	1	B-D	B3.2	29-STG-1240-IRS Inlet nozzle IRS	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 86.0 % of code required volume in at least 1 direction.	Close proximity of insulation support bracket limits effective examination of code required volume.	None

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<u>sum #</u>	<u>CLS</u>	<u>CAT</u>	<u>ITEM</u>	EXAM	TYPE	LIMITATION	BASIS	ALT
021300	1	B-D	B3.2	29-STG-1210-IRS Inlet nozzle IRS	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 82.0 % of code required volume in at least 1 direction.	Close proximity of insulation support bracket limits effective examination of code required volume.	None
020800	1	B-D	B3.2	31-STG-1220-IRS Inner radius	VOL	Complete volumetric examination of the code volume is not obtainable. Ut performed on 74.0 % of code required volume in at least 1 direction.	Insulation support limits effective examination of code required volume.	None
021200	1	B-D	B3.2	29-STG-1220-IRS Inner radius	VOL	Complete volumetric examination of the code volume is not obtainable. Ut performed on 66.0 % of code required volume in at least 1 direction.	Insulation support limits effective examination of code required volume.	None
050000	1	B-F	B4.1	6-PR-1205-1 Nozzle to safe-end	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. No UT performed in the axial direction.	Nozzle to safe-end configuration limits examination of code required volume.	None
051200	1	B-F	B4.1	6-PR-1204-1 Nozzle to safe-end	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. UT not performed on code required volume.	Nozzle to safe-end configuration limits examination of code required volume.	None
052400	1	B-F	B4.1	6-PR-1203-1 Nozzle to safe-end	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 52.5% of code volume examined in at least 1 direction.	Nozzle and safe-end configuration limits examination of code volume.	None
070000	1	₿~F	B4.1	31-RC-1240-1 Nozzle to elbow	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. UT not performed on code required volume in the axial direction.	Nozzle to safe-end configuration limits examination of code required volume.	None
072300	1	B-F	B4.1	31-RC-1230-1 Nozzle to Elbow	SUR/ VOL	Complete Volumetric examination not obtained no UT performed in the axial direction.	Examination not performed due to the acoustic properties of cast elbow and nozzle configuration.	None

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SUM #	<u>CLS</u>	<u>CAT</u>	ITEM	EXAM	TYPE	LIMITATION	BASIS	<u>ALT</u>
074600	1	B-F	B4. 1	31-RC-1220-1 Nozzle to elbow	SUR/ VOL	Complete volumetric not obtained no examination performed in the axial direction.	Examination not performed due to the acoustic properties of the cast elbow and nozzle configuration.	None .
076800	1	B-F	B4.1	31-RC-1210-1 Nozzle to elbow	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. No UT performed in the axial direction.	Examination not performed due to the acoustic properties of the cast elbow and nozzle configuration.	None
080000	1	B-F	B4.1	29-RC-1240-5 Elbow to nozzle	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. No UT performed on code required volume in the axial direction.	Acoustic properties of cast elbow as well as nozzle configuration limits effective examination of code required volume.	None
081200	1	B-F	B4.1	29-RC-1230-5 Elbow to nozzle	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. No UT performed on code required volume in the axial direction.	Acoustic properties of cast elbow as well as nozzle configuration limits effective examination of code required volume.	None
082200	1	B-F	B4.1	29-RC-1220-5 Elbow to nozzle	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. No UT performed on code required volume in the axial direction.	Acoustic properties of cast elbow as well as nozzle configuration limits effective examination of code required volume.	None
083300	1	B-F	B4.1	29-RC-1210-5 Elbow to nozzle	SUR/ VOL	Complete volumetric examination of the code volume is not obtainable. UT not performed on code required volume in the axial direction.	Acoustic properties of cast elbow and nozzle configuration limits examination of the code required volume.	None
030800	1	B−J	B4.5	3-CV-1243-4 Valve to elbow	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 100 % of code required volume in at least 1 direction.	Valve configuration limits examination of the code required volume.	None

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<u>sum #</u>	<u>CLS</u>	<u>CAT</u>	ITEM	EXAM	TYPE	LIMITATION	BASIS	ALT
034800	1	B-J	B4.5	3-CV-1231-2 Valve to elbow	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 72.8 % of code required volume in at least 1 direction.	Sharp elbow curvature limits examination of the code required volume.	None ,
070500	1	B−J	B4.5	31-RC-1240-3 Pipe to elbow	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 50 % of code required volume in at least 1 direction.	Acoustic properties of elbow limits examination of code required volume.	None
075100	1	B-J	B4.5	31-RC-1220-3 Pipe to elbow	VOL	Complete volumetric examination of the code volume is not obtainable. 61% of the code volume will be examined with at least 4 directions.	Examination not performed due to the acoustic properties of the cast elbow.	None
078200	1	B-J	B4.5	31-RC-1210-4 Elbow to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 50.0 % of code required volume in at least 1 direction.	Acoustic properties of cast elbow and branch connection configuration limits effective examination of code required volume.	SUR
083200	1	B-J	B4.5	29-RC-1210-4 Pipe to elbow	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 50.0% of code required volume in at least 1 direction.	Acoustic properties of cast elbow limits examination of code required volume.	None
083400	1	B-J	B4.5	27.5-RC-1240-1 Pump to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 47.7 % of code required volume in at least 1 direction.	Pump configuration and branch connection limits examination of code required volume.	None
151800	1	B-J	B4.5	14-RH-1211-15 Valve to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 86.2% of code volume examined in at least 1 direction.	Valve configuration limits effective examination of code volume.	None

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<u>sum #</u>	<u>CLS</u>	<u>CAT</u>	ITEM	EXAM	TYPE	LIMITATION	BASIS	ALT
160750	1	B-J	B4.5	10-SJ-1241-8 Elbow to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 50.0% code required volume in at least 1 direction.	Penetration sleeve limits accessibility and examination of code required volume.	None
172400	1	B−J	B4.5	6-SJ-1241-16 Valve to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 79.3% of code volume in at least 4 directions.	Valve configuration limits effective examination of code volume.	None
172 4 50	1	B-J	B4.5	6-SJ-1241-16 Valve to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 79.3% of code volume in at least 1 direction.	Valve configuration limits effective examination of code volume.	None
174550	1	B-J	B4.5	6-SJ-1222-1 Reducer to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. No UT performed on code required volume in the axial direction.	Reducer to valve configuration prevents examination of code required volume.	None
174600	1	B-J	B4.5	6-SJ-1222-2 Valve to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 80.1% of code volume in at least 1 direction.	Valve configuration limits effective examination of code volume.	None
179000	1	B-J	B4.5	4-SJ-1282-10 Pipe to elbow	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 82.5% of code volume in at least 1 direction.	Structural member limits effective examination of code volume.	None 🖤
161900	1	B-K-1	B4.9	10-SJ-1231-5PS Penetration to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 91.1% of code volume examined in at least 1 direction.	Penetration configuration limits examination of code required volume.	SUR

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<u>sum #</u>	<u>CLS</u>	<u>CAT</u>	ITEM	EXAM	<u>type</u>	LIMITATION	BASIS	ALT
275210	2	С-А	c1.1	2-LHEX-1 Flange to shell	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 82.4% of code volume in at least 1 direction.	Flange configuration and the close proximity of 4" sensing lines limits the effective examination of code volume.	None ·
275230	2	C-A	c1.1	2-RCF-1 Upper head to flange	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 50.0 % of code required volume in at least 1 direction.	Adjacent flanges and supports limits effective examination of code required volume.	None
275040	2	с-с	C1.3	2-CVCT-2VS-1&2 Vessel support	SUR	Complete surface examination of the code volume is not obtainable. PT performed on 62.0% of code volume. 6" of weld not inspected.	Inaccesibilty of weld limits the effective examination of code volume.	None
380050	2	C-E-1	C2.5	34-MS-2241-2PS-1&2 Pipe support	SUR	Complete surface examination of the code volume is not obtainable. 50 % of the code required inspected.	Adjacent pipe support limits effective examination of code required volume.	None
573383	2	C-E-1	C2.5	12-SJ-2252-38PS-1&2 Pipe support	SUR	Complete surface examination of the code volume is not obtainable. All but 8" of weld on each lug inspected.	Piping orientation limits examination of code required volume.	None
360010	2	C-F	C2. 1	8-CV-2201-1 Valve to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 69.7 % of code required volume in at least 1 direction.	Pipe restraint and valve configuration limits examination of code required volume.	None
360110	2	C-F	C2.1	8-CV-2201-11 Pipe to tee	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 69.7 % of code required volume in at least 1 direction.	Pipe restraint limits examination of code required volume.	None

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SUM #	CLS	CAT	ITEM	EXAM	<u>TYPE</u>	LIMITATION	BASIS	<u>ALT</u>
500810	2	C-F	c2.1	6-PR-2203-2 Elbow to pipe	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 55.9 % of code required volume in at least 1 direction.	Close proximity of permanent pipe support limits examination of the code required volume.	None
502410	2	C-F	C2.1	8-RH-2273-1 Tee to reducer	VOL	Complete volumetric examination of the code volume is not obtainable. No UT performed on code required volume in the axial direction.	Tee to valve configuration limits examination of code required volume.	None
503340	2	C-F	c2.1	8-RH-2216-4 Flange to valve	VOL	Complete volumetric examination of the code volume is not obtainable. No UT performed on code required volume in the axial direction.	Flange to valve configuration limits examination of code required volume.	SUR
330930	2	C-G	C2.1	14-BF-2211-2 Pipe to elbow	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 81.3% of code required volume in at least 1 direction.	Whip restraint and 4" branch connection limits examination of code required volume.	None
380040	2	C-G	C2.3	34-MS-2241-2/8-MS-2241 8" branch connection	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 82.4% of code volume in at least 1 direction.	Flange configuration and the close proximity of 4" sensing lines limits the effective examination of code volume.	SUR
380050	2	C-G	C2.1	34-MS-2241-3 Pipe to valve	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 83.8 % of code required volume in at least 1 direction.	Valve configuration and branch connection limits examination of code required volume.	None
380780	2	C-G	C2. 1	34-MS-2211-3 Pipe to valve	VOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 82.3 % of code required volume in at least 1 direction.	Valve configuration limits effective examination of code required volume.	None

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SUM #	<u>CLS</u>	CAT	ITEM	EXAM	1	YPE	LIMITATION	BASIS	ALT
384545	2	C-G	C2. 1	6-MS-2211-16A Pipe to valve	v	/OL	Complete volumetric examination of the code volume is not obtainable. Ut performed on 72.0 % of code required volume in at least 1 direction.	Valve configuration limits effective examination of code required volume.	None
384548	2	C-G	C2. 1	6-MS-2211-16B Valve to pipe	V.	/OL	Complete volumetric examination of the code volume is not obtainable. Ut performed on 73.0 % of code required volume in at least 1 direction.	Valve configuration limits effective examination of code required volume.	None
384630	2	C-G	C2.1	6-MS-2231-4 Pipe to valve		/OL	Complete volumetric examination of the code volume is not obtainable. UT performed on 77.6% of code volume in at least 1 direction.	Valve configuration and limits the effective examination of code required volume.	None
384683	2	C-G	C2.1	6-MS-2231-9A Pipe to valve	v	/OL	Complete volumetric examination of the code volume is not obtainable. UT performed on 80.0 % of code required volume in at least 1 direction.	Flange configuration limits effective examination of code required volume.	None
384685	2	C-G	C2.1	6-MS-2231-9B Pipe to valve	v	JOL	Complete volumetric examination of the code volume is not obtainable. UT performed on 80.0 % of code required volume in at least 1 direction.	Valve configuration limits effective examination of code required volume.	None

<u>COMPONENT DESCRIPTION:</u>

Pressure Retaining Valves

ASME CODE CLASS:

ASME Section XI, Class 1 Valves

ASME EXAMINATION REQUIREMENTS:

Relief is being requested from the visual (VT) examination requirements of Table IWB-2500 Examination Category B-M-2 Item No. B6.7.

BASIS FOR RELIEF:

The disassembly of functional valves during the first ten year inspection interval for the sole purpose of performing a visual examination of the internals would have increased the likelihood for component failure in the future and was contrary to good maintenance practices. Considering the uncertainy of the benefit involved with this examination, it is difficult to justify the additional radiation exposure that would be incurred as a result of the disassembly, examination and reassembly these valves. For example, estimates from radiation surveys performed on and around valve 2RH1 indicate that the total job dose that would be received in disassembling, examining and reassembling this valve be in excess of 4 man-rem. Public Service Electric & Gas feels implementation of this examination is impractical for valves not scheduled for disassembly because of preventive or corrective maintenance. In later editions of Section XI, this examination is only required to be performed on valves scheduled for disassembly for maintenance purposes.

ALTERNATIVE EXAMINATION:

Public Service Electric and Gas examined at least one value in a value group (values of similar design and function) where at least one value in the group was disassembled for maintenance purposes during the inspection interval. If any value examined was found to require corrective action, additional values in that group would be disassembled and inspected as required by Section XI.

Utilizing the above guidelines, the following valves listed by group were never disassembled during the first inspection interval and therefore, the internals were not visually examined. A similar relief request has been submitted for the second ten year interval per later editions of the Code.

Valve	Valve	Valve	Valve
<u>Group</u>	<u>Group</u>	<u>Group</u>	<u>Group</u>
2RH1	2RH26	21SJ49	21SJ54
2RH2		22SJ49	22SJ54

COMPONENT DESCRIPTION:

Reactor Pressure Vessel and Nozzles

ASME CODE CLASS:

ASME Section XI, Class 1 Vessel

ASME EXAMINATION REQUIREMENTS:

Relief is being requested from the ultrasonic (UT) examination requirements of Table IWB-2500 Examination Categories B-A, B-B and B-D, Item No.'s B1.1, B1.2 and B1.4, respectively.

BASIS FOR RELIEF:

Due to the geometry of the reactor vessel and the proximity of some of the vessel penetrations, code required coverage of all the applicable welds cannot be obtained utilizing automated UT equipment.

ALTERNATIVE_EXAMINATION:

Ultrasonic examinations were performed on as much of the weld geometry that could be examined. For vessel welds in the beltline region (Categ. B-A), Public Service Electric & Gas attempted to perform a 100% examination of all the required vessel welds which exceeds the Code requirement to examine 10% of all circumferential welds and 5% of all longitudinal welds. Attached is a listing of those welds where the Code required volume could not be examined due to geometry and interferences.

REF. #	EXAM Cat.	WELD NUMBER/ EXAM AREA	BEAM DIR.	ै COVER	REMARKS
001900	В-В	2-RPV-3443 LOWER HEAD DISK TO PEEL SEGMENT CIRC. WELD	CW CCW UP DOWN	4.79% 4.79% 3.66% 4.80%	EXAMINATION LIMITED DUE TO PROXIMTY OF INSTRUMENTATION TUBES
002900	B-D	29-RCN-1240 OUTLET NOZZLE @ 22-DEG	CW CCW TOWARD RX	25.60% 25.60% 96.66%	LIMITED DUE TO INTEGRAL EXTENSION AND GEOMETRIC SHADOWING
003200	B-D	29-RCN-1230 OUTLET NOZZLE @ 158-DEG	CW CCW TOWARD RX	25.60% 25.60% 96.66%	LIMITED DUE TO INTEGRAL EXTENSION AND GEOMETRIC SHADOWING
003300	B-D	29-RCN-1230 OUTLET NOZZLE @ 203-DEG	CW CCW TOWARD RX	25.60% 25.60% 96.66%	LIMITED DUE TO INTEGRAL EXTENSION AND GEOMETRIC SHADOWING
003600	B-D	29-RCN-1230 OUTLET NOZZLE @ 338-DEG	CW CCW TOWARD RX	25.60% 25.60% 96.66%	LIMITED DUE TO INTEGRAL EXTENSION AND GEOMETRIC SHADOWING

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COMPONENT DESCRIPTION:

Interior Clad Surfaces of Class 1 Vessels

ASME CODE CLASS:

ASME Section XI, Class 1 Vessels

ASME EXAMINATION REQUIREMENTS:

Relief is being requested from the visual and surface, or volumetric examinations in Examination Category B-I-1 Item No. B1.13 and the visual examination examinations required by Table IWB-2500 Examination Category B-I-2 Item No.'s B2.9 and B3.8 as required by ASME Section XI 1974 Edition, Summer '75' Addenda, Table IWB-2500.

BASIS FOR RELIEF:

The requirement to perform these examinations has been deleted in later editions of ASME Section XI. In addition, the radiation dose required to complete these inspections is in conflict with the station's ALARA guidelines. Visual and surface examinations were completed on two (2) of the six (6) required Reactor Pressure Vessel closure head cladding patches (Cat. B-I-1, Item B1.13) in the first inspection period with no reportable indications noted.

The cladding patch on the pressurizer (Cat. B-I-2, Item B2.9) was not examined during the inspection interval.

Two (2) of the required eight (8) visual examinations on the steam generator cladding patches (Cat. B-I-2, Item B3.9) were completed in the first inspection period with no reportable indications noted.

ALTERNATIVE EXAMINATION:

There are no alternative examinations proposed for these examinations.

COMPONENT DESCRIPTION:

Support Components for Piping, Pumps and Valves

ASME CODE CLASS:

ASME Section XI, Class 2 and 3 Supports

ASME EXAMINATION REQUIREMENTS:

Relief is being requested from the visual examinations required by ASME Section XI 1974 Edition, Summer '75' Addenda, Table IWC-2520 Examination Category C-E-2, Item No C2.6 and IWD-2600 (c).

BASIS FOR RELIEF:

Some of the supports scheduled for examination during the inspection interval could not be examined due to their accessibility. These supports cannot be examined because they are either encased within concrete or encapsulated by guardpipe. In our submittal for Salem Unit 2, 2nd Ten Year Inspection Interval, Public Service Electric & Gas has requested the use of ASME Code Case N-491 which exempts these types of components from examination.

ALTERNATIVE EXAMINATION:

There are no alternative examinations proposed for these examinations at this time. Below is a listing of those component supports which could not be examined during the 1st inspection interval.

2C-21-FWH-018	2A-CCH-054	2A-CCH-079	2A-SWG-317
2C-24-FWH-024	2A-CCS-064	2A-CCH-080	2A-SWG-318
2C-MSH-207	2A-CCG-065	2A-CCA-088	2A-SWG-319
2A-CCH-030	2A-CCA-066	2A-CCG-101	2A-SWG-320
2A-CCA-031	2A-CCH-067	2A-CCG-102	2A-SWG-321
2A-CCG-032	2A-CCS-073	2A-CCS-104	2A-SWG-322
2A-CCG-033	2A-CCG-074	2A-CCS-126	2A-SWG-323
2A-CCS-034	2A-CCG-075	2P-CCA-367	2A-SWG-324
2A-CCA-052	2A-CCA-076	2P-CCA-368	
2A-CCG-053	2A-CCH-077	2F-SFCG-007	