

Mr. Steven E. Miltenberger
Vice President and Chief Nuclear
Officer
Public Service Electric and Gas
Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

Dear Mr. Miltenberger:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR INSERVICE INSPECTION PROGRAM,
FIRST 10-YEAR INTERVAL, FINAL RELIEF REQUESTS, SALEM NUCLEAR
GENERATING STATION, UNIT NO. 2 (TAC NO. M84658)

The NRC staff is reviewing and evaluating the First 10-Year Interval Inservice
Inspection Program Plan Final Relief Requests as contained in Public Service
Electric and Gas Company's letter dated September 28, 1992. Additional
information is required for the staff to complete their review of the relief
requests as detailed in the enclosure.

In order for the staff to meet its inservice inspection program plan review
schedule, it is requested that you respond within 60 days of receipt of this
letter. In addition, in order to expedite the review process, please send a
copy of your response to the request for additional information to the NRC's
contractor, INEL, at the following address:

Boyd W. Brown
EG&G Idaho, Inc.
INEL Research Center
2151 North Boulevard
P.O. Box 1625
Idaho Falls, Idaho 83415-2209

This requirement affects 9 or fewer respondents and, therefore, is not subject
to Office of Management and Budget review under P.L. 96-511.

Sincerely,

Original signed by:
James C. Stone, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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P PDR

Enclosure:
Request for Additional
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 5, 1993

Docket No. 50-311

Mr. Steven E. Miltenberger
Vice President and Chief Nuclear
Officer
Public Service Electric and Gas
Company
Post Office Box 236
Hancocks Bridge, New Jersey 08038

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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR INSERVICE INSPECTION PROGRAM,
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The NRC staff is reviewing and evaluating the First 10-Year Interval Inservice Inspection Program Plan Final Relief Requests as contained in Public Service Electric and Gas Company's letter dated September 28, 1992. Additional information is required for the staff to complete their review of the relief requests as detailed in the enclosure.

In order for the staff to meet its inservice inspection program plan review schedule, it is requested that you respond within 60 days of receipt of this letter. In addition, in order to expedite the review process, please send a copy of your response to the request for additional information to the NRC's contractor, INEL, at the following address:

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Sincerely,

A handwritten signature in cursive script that reads "James C. Stone".

James C. Stone, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Request for Additional
Information

PUBLIC SERVICE ELECTRIC & GAS COMPANY
SALEM NUCLEAR GENERATING STATION, UNIT 2
DOCKET NUMBER 50-311

Request for Additional Information - First 10-Year Interval Inservice
Inspection Program, Final Requests for Relief

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2, and Class 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during the successive 120-month inspection interval comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of a successive 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein. Public Service Electric & Gas Company (the licensee) prepared the *Salem Nuclear Generating Station, Unit 2, First 10-Year Interval Inservice Inspection, Final Requests for Relief*, where compliance with the requirements of the 1974 Edition of Section XI of the ASME Code with Addendum through the Summer 1975 was not achieved. As required by 10 CFR 50.55(g)(5), if the licensee determines that certain Code examination requirements are impractical and requests relief, the licensee shall submit information to the Nuclear Regulatory Commission (NRC) to support that determination.

The staff has reviewed the available information in the *Salem Nuclear Generating Station, Unit 2, First 10-Year Interval Inservice Inspection, Final Requests for Relief*, submitted September 28, 1992, which requests relief from the ASME Code Section XI requirements that the licensee has determined to be impractical.

2. Additional Information Required

Based on the above review, the staff has concluded that the following information and/or clarification is required to complete the review of the final requests for relief:

- A. Final Relief Request #1 includes requests for relief due to limited volumetric examination coverage. In February 1990, the licensee requested and received approval for the

use of ASME Code Case N-460, which allows a reduction of examination coverage not to exceed 10 percent of the required volume.

The licensee has provided a table describing the examination areas for which relief is requested. Under the table heading "LIMITATION", the licensee gives the percent of volumetric examination area that received volumetric coverage followed by the statement that coverage was obtained in at least one direction. Based on Code Case N-460, the licensee states that for some of the limited examinations listed in this table, relief would no longer be required.

From the information provided, the extent to which Code-required volume coverage being obtained is unclear to the staff; therefore, the examination areas that would not require relief based on Code Case N-460 cannot be determined. Code examination coverage is satisfied when the ultrasonic beam passes through the cross-sectional volume of a specified examination area in two directions for the specified Code examination length. If coverage is obtained in at least one direction, as stated, but coverage in the second direction is not quantified, the Code-required coverage obtained is not known, and the basis for the claim that relief may no longer be required is not clear.

The staff requests that the licensee provide the accumulative examination volume coverage based on; (1) the percent of volume coverage obtained by two directional, beam component coverage for-scans perpendicular to the weld; (2) the percent of volume coverage obtained for scans performed with the beam component parallel to the weld; and (3) the percent of the total length scanned.

- B. In the table for Final Relief Request #1, it appears that examination areas 29-STG-1240-IRS and 6-SJ-1241-16 both have duplicate examination areas identified under a separate Sum #. Please clarify the apparent duplication.
- C. Final Relief Request #2, Alternative Examination, states: "Public Service Electric and Gas examined at least one valve in a valve group (valves of similar design and function) where at least one valve in the group was disassembled for maintenance purposes during the inspection interval. If any valve examined was found to require corrective action, additional valves in that group would be disassembled and inspected as required by Section XI". It is further stated, in the second paragraph under

"Alternative Examination", that the aforementioned statement is a guideline.

It is unclear to the staff whether the guideline for the "Alternative Examination" is a statement of examinations performed or a statement of requirement (i.e. will examine at least one valve.....). Please clarify the extent of the Code-required examinations that were completed during the first 10-year interval.

- D. Included in Final Relief Request #3 is a reference to Examination Category B-A, Item Number B1.1, for examination of reactor vessel welds in the beltline region. It appears that the licensee is requesting credit for examination area coverage of Category B-A welds that exceeded the Code requirements, as an alternative examination for relief associated with Examination Category B-B and B-D. The licensee states that for vessel welds in the beltline region, 100 percent examination of all the required welds was attempted.

Although the licensee maximized coverage on the Category B-A examination volume, this does not constitute an alternative examination for other examination categories. The licensee should include alternative examinations that are applicable to the examination category and examination areas for which Code-required coverage is not obtained. Please provide a revised relief request that addresses any alternative examinations for limitations associated with Examination Categories B-B and B-D.

- E. Final Relief Request #3 has a table that lists percents of coverage for "Beam Directions," CW, CCW, Up, Down, and Toward RX. Refer to "A" above and provide the percent of examination area coverage obtained.

Mr. Steven E. Miltenberger
Public Service Electric & Gas
Company

Salem Nuclear Generating Station,
Units 1 and 2

cc:

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