Public Service
Electric and Gas
Company

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United States Nuclear Regulatory Commission
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Gentlemen:

ASME CODE SECTION XI
REPAIR, REPLACEMENT AND MODIFICATION PROGRAM
SALEM GENERATING STATION
UNIT NO. 1
DOCKET NO. 50-272

Pursuant to 10CFR50.55(a)(g)(5)(iii), Public Service Electric and Gas Company (PSE&G) hereby submits a request to use a portion of the 1992 Edition of the ASME Boiler and Pressure Vessel Code Section XI (IWA-4500). During the 1995 Salem Unit No. 1 twelfth refueling outage (1R12), the feedwater thermal sleeve upgrade project may require weld repair on the steam generator feedwater nozzle inner diameter (ID) surface areas. The nozzle is constructed of SA-508 Class 2 material (P3 - Group 3) which requires post weld heat treatment.

Because of the change in sectional thickness of the feedwater nozzle along its principal axis, post weld heat treatment of these repair welds is extremely difficult and represents undue hardship. Additionally, the performance of any post weld heat treatment would unnecessarily contribute to the total permissible cumulative post weld heat treatment time, qualified during the original construction of the Salem steam generators. Consequently, it is desirable to employ a welding technique that does not require post weld heat treatment.

The Salem Unit No. 1 commitment to the ASME Code Section XI, 1983 Edition, Summer 1983 Addenda, only permits the use of Shielded Metal Arc Welding process to accomplish such repairs. An automatic (machine) Gas Tungsten Arc Welding process is preferred to the manual Shielded Metal Arc Welding process. The Gas Tungsten Arc Welding process is superior for controlling vital process variables, which contribute to the quality of such welds.

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NRC approved Code Case N-432, allows the Gas Tungsten Arc Welding process for temperbead repairs on Class 1 components. However, full compliance with this Code Case requires that the welding procedure qualification test assembly be made from the same material (i.e., specification, type, grade, class including a post weld heat treatment at least equivalent to the time and temperature already applied to the material, to the material being repaired). When Code Case N-432 was incorporated into the 1992 Edition of the ASME Code, Section XI, some relaxations of these requirements were provided.

Although the 1992 Edition of the ASME Code has not been approved by the NRC, the 1992 Edition allows the procedure qualification test assembly to meet the same P number and group number of the material being repaired. This change provides acceptable material properties for the procedure qualification test assembly, without imposing undue complications of replicating the materials for the test assembly to that which is being repaired.

Approval of this relief request is to support the 1R12 refueling outage (Scheduled to start in September 1995). A similar relief request for San Onofre Nuclear Generating Station was approved by the NRC in a letter to Southern California Edison dated July 27, 1993.

If you have any questions concerning this submittal, do not hesitate to contact me.

Sincerely,

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