

Public Service
Electric and Gas
Company

E. C. Simpson

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-1700

Senior Vice President - Nuclear Engineering

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LR-N95169

United States Nuclear Regulatory Commission
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Washington, DC 20555

Gentlemen:

**ASME CODE CASE N-532
SALEM GENERATING STATION UNIT NOS. 1 & 2
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NOS. DPR-70, DPR-75 & NPF-57
DOCKET NOS. 50-272, 50-311 & 50-354**

Public Service Electric and Gas Company (PSE&G) requests approval, in accordance with the requirements of 10CFR50.55a(a)(3), to use American Society Of Mechanical Engineers (ASME) Code Case N-532, "Alternate Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000" (Copy Attached) for Salem Generating Station Unit Nos. 1 and 2 and Hope Creek Generating Station. The use of this Code Case is not presently referenced in NRC Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1", Revision 11 dated October, 1994.

Code Case N-532 provides an alternative to the current ASME Section XI repair and replacement documentation requirements, and regulatory reporting requirements related to Inservice Inspections. NRC Letter SECY-94-093 dated April 1, 1994 provides the NRC's recommendation to eliminate the need to submit summary Inservice Inspection (ISI) reports to the NRC following each refueling outage in accordance with ASME Section XI, Article IWA-6000. The NRC recommended that code reporting requirements per IWA-6000 be modified through its representation on the ASME Code Committee to reduce licensee burden and eliminate the need to submit the ISI summary reports. Consistent with the recommendations in the NRC SECY Letter, it is PSE&G's intent to not submit periodically the Owner's Activity Report identified by Code Case N-532. The Owner's Activity Report will be completed by PSE&G in accordance with Code Case N-532 and will be available for NRC review upon request.

The cost effective alternatives afforded by this Code Case have been determined by the ASME to provide an acceptable alternative to existing requirements. The alternatives provide a substantial

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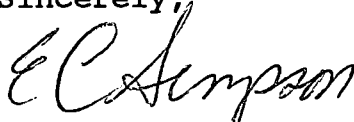
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LR-N95169

2

reduction in the overall administrative burden each of PSE&G's plants are required to meet in accordance with the requirements of IWA-6000. Further, this Code Case does not create any technical changes that would impact the existing ISI programs or the Technical Specifications at either Salem or Hope Creek, and does not introduce a condition that would compromise existing levels of safety or quality.

Should you have any questions on this submittal, please contact us.

Sincerely,



C Mr. T. T. Martin, Administrator - Region 1
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. L. N. Olshan, Licensing Project Manager - Salem
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 14E21
Rockville, MD 20852

Mr. D. Jaffe, Licensing Project Manager - Hope Creek
U. S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Mail Stop 14E21
Rockville, MD 20852

Mr. C. S. Marschall (X24)
USNRC Senior Resident Inspector

Mr. R. Summers (X24)
USNRC Senior Resident Inspector

Mr. Kent Tosch, Manager, IV
NJ Department of Environmental Protection
Division of Environmental Quality
Bureau of Nuclear Engineering
CN 415
Trenton, NJ 08625

Approval Date: December 12, 1994

See Numeric Index for expiration
and any reaffirmation dates.

Case N-532
Alternative Requirements to Repair and
Replacement Documentation Requirements and
Inservice Summary Report Preparation and
Submission as Required by IWA-4000 and IWA-
6000¹
Section XI, Division 1

Inquiry: What alternatives may be used to the requirements of IWA-4910(d) and IWA-6210(e) for completion of Form NIS-2 following repair or replacement, and IWA-6210(c) and (d), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(h) for preparation and submittal of the inservice summary report and Form NIS-1?

Reply: It is the opinion of the Committee that as an alternative to the requirements of IWA-4910(d), IWA-6210(c), (d), and (e), IWA-6220, IWA-6230(b), (c), and (d), and IWA-6240(b), the following provisions may be used. This Case shall be utilized at least until the end of the inspection period in which it was invoked.

1.0 CERTIFICATION OF THE REPAIR OR REPLACEMENT

(a) The Owner's Repair/Replacement Program shall identify use of this Case.

(b) A Repair/Replacement Plan shall be prepared in accordance with IWA-4140¹, and shall be given a unique identification number.

(c) Upon completion of all required activities associated with the Repair/Replacement Plan, the Owner shall prepare a REPAIR/REPLACEMENT CERTIFICATION RECORD, FORM NIS-2A.

(d) Form NIS-2A shall be presented to the Inspector for certification.

¹All references to IWA-4000 and IWA-6000 used in this Case refer to the 1992 Edition.

(e) The completed Form NIS-2A shall be maintained by the Owner.

(f) The Owner shall maintain an index of Repair/Replacement Plans in accordance with IWA-6340. The index shall identify the identification number required by (b) above and the inspection interval and period during which each repair or replacement was completed.

2.0 OWNER'S ACTIVITY REPORT PREPARATION AND SUBMITTAL

An OWNER'S ACTIVITY REPORT FORM OAR-1 shall be prepared and certified upon completion of each refueling outage. Each Form OAR-1 prepared during an inspection period shall be submitted following the end of the inspection period. Each Form OAR-1 shall contain the following:

(a) Abstract of applicable examinations and tests with the information and format of Table 1.

(b) A listing of item(s) with flaws or relevant conditions that required evaluation to determine acceptability for continued service, whether or not the flaw or relevant condition was discovered during a scheduled examination or test. The listing shall provide the information in the format of Table 2.

(c) Abstract for repairs, replacements and corrective measures performed, which were required due to an item containing a flaw or relevant condition that exceeded IWB-3000, IWC-3000, IWD-3000, IWE-3000, IWF-3000, or IWL-3000 acceptance criteria; even though the discovery of the flaw or relevant condition that necessitated the repair, replacement or corrective measure, may not have resulted from an examination or test required by this Division. If acceptance criteria for a particular item is not specified in this Division, the provisions of IWA-3100(b) shall be used to determine which repairs, replacements, and corrective measures are required to be included in the abstract. The abstract shall provide the information in the format of Table 3.

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N-532

FORM OAR-1. OWNER'S ACTIVITY REPORT

Report Number: _____

Owner _____
(Name and Address of Owner)

Plant _____
(Name and Address of Plant)

Unit No. _____ Commercial service date _____ Refueling outage no. _____
(If applicable)

Current inspection interval _____
(1st, 2nd, 3rd, 4th, other)

Current inspection period _____
(1st, 2nd, 3rd)

Edition and Addenda of Section XI applicable to the inspection plan _____

Date and revision of inspection plan _____

Edition and Addenda of Section XI applicable to repairs and replacements, if different than the inspection plan _____

CERTIFICATE OF CONFORMANCE

I certify that the statements made in this Owner's Activity Report are correct, and that the examinations, tests, repairs, replacements, evaluations, and corrective measures represented by this report conform to the requirements of Section XI.

Certificate of Authorization No. _____ Expiration Date _____
(If applicable)

Signed _____ Date _____
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of _____ and employed by _____ of _____ have inspected the items described in this Owner's Activity Report, during the period _____ to _____ and state that to the best of my knowledge and belief, the Owner has performed all activities represented by this report in accordance with the requirements of Section XI.

By signing this certificate neither the inspector nor his employer makes any warranty, expressed or implied, concerning the examinations, tests, repairs, replacements, evaluations and corrective measures described in this report. Furthermore, neither the inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

Inspector's Signature _____ Commissions _____ National Board, State, Province, and Endorsements _____

Date _____

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N-532

TABLE 1
ABSTRACT OF EXAMINATIONS AND TESTS

Examination Category	Total Examinations Required for The Interval	Total Examinations Credited for This Period	Total Examinations Credited (%) For The Period	Total Examinations Credited (%) To Date for The Interval	Remarks
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TABLE 2
ITEMS WITH FLAWS OR RELEVANT CONDITIONS THAT
REQUIRED EVALUATION FOR CONTINUED SERVICE

Examination Category	Item Number	Item Description	Flaw Characterization (IWA-3300)	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes or No)
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TABLE 3
ABSTRACT OF REPAIRS, REPLACEMENTS, OR CORRECTIVE MEASURES
REQUIRED FOR CONTINUED SERVICE

Code Class	Repair, Replacement, or Corrective Measure	Item Description	Description of Work	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes/No)	Date Complete	Repair/ Replacement Plan Number
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