

Public Service  
Electric and Gas  
Company

MAY 27 1998

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Senior Vice President - Nuclear Operations

LR-N980190

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

Gentlemen:

**ONE TIME REVISION TO COMMITMENT  
SALEM GENERATING STATION  
UNIT NO. 1  
DOCKET NO. 50-272**

By letter dated November 18, 1994, Public Service Electric and Gas (PSE&G) requested approval to use an alternative to the American Society of Mechanical Engineers (ASME) Code Section XI pursuant to the provisions of 10 CFR 50.55a(a)(3). Specifically, PSE&G requested approval to use ASME Code Case N-416-1, "Alternative Pressure Test Requirements for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2, and 3, Section XI, Division 1."

The Nuclear Regulatory Commission (NRC) granted approval by NRC letter dated January 20, 1995 (Reference TAC Nos. M91325 and M91327). In approving the use of Code Case N416-1, the NRC staff imposed additional restrictions for Class 3 piping. Specifically, the NRC staff required that additional surface examinations be performed on the root pass layer of butt and socket welds on the pressure retaining boundary of Class 3 components in addition to the surface examinations used in accordance with ASME Section III, as established by the Code Case.

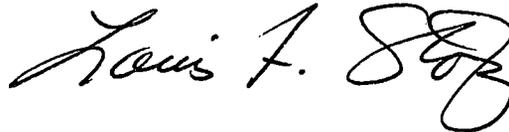
According to the PSE&G commitment management program and on a one time only basis, PSE&G has revised its commitment to the specific provisions contained in the NRC SER to perform a weld root pass surface NDE. Instead a volumetric examination (i.e.; radiography) on this pressure boundary ASME Class 3 component was performed. This one time only change was found acceptable under the requirements of 10CFR50.59. Details concerning the change are provided in Attachment I to this letter.

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

Sincerely,



Attachment (1)

C Mr. Hubert J. Miller, Administrator - Region I  
U. S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Mr. P. Milano, Licensing Project Manager - Salem  
U. S. Nuclear Regulatory Commission  
One White Flint North  
11555 Rockville Pike  
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Mr. S. Morris - Salem (S09)  
USNRC Senior Resident Inspector

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



**ATTACHMENT I**  
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On January 20, 1995, the Nuclear Regulatory Commission (NRC) issued its Safety Evaluation Report (SER)(TAC Nos. M91325 and M91327) granting permission to Public Service Electric and Gas (PSE&G) to use American Society of Mechanical Engineers (ASME) Code Case N-416-1, "Alternative Pressure Test Requirements for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2, and 3, Section XI, Division 1." In granting the use of this Code Case, additional NDE requirements were imposed by the NRC Staff. For Code Class III piping socket welds, as in this application, a surface examination (e.g., penetrant test - PT) is additionally required by the SER to be performed on the root pass weld layer in order to employ the Code Case. The Staff's basis for stipulating additional examinations in Class 3 welds is due to the fact that the Code Case requires NDE to meet ASME Section III Class 3 criteria, which does not generally require volumetric examinations to be performed on Class 3 components.

In November 1997, repairs were made to the inlet taper bore insert to the spool attaching the 1AF128 relief valve. The work was done via work order 930922127 and repair plan number S97-258. In preparation of the repair plan, Code Case N-416-1, exemption from an ASME Section XI hydrostatic pressure test, was not identified. This was in error since the line in question is interconnected to 13 Auxiliary Feedwater Pump Turbine governor coolers that can not be hydrostatically tested without significant hardship. Invoking Code Case N-416-1 eliminates the need for hydrostatic test pressures and allows a Section XI System Leakage test at nominal operating pressure and temperature to be performed in its place.

In March, 1998, during completion of the work package maintenance personnel identified that the Code Case N-416-1 was not identified. Since Code Case N-416-1 was not originally specified by the repair plan, a root pass surface examination was not performed. Also, as explained above, a Section XI System Hydrostatic test can not be performed without significant hardships due to the unisolable coolers that would be required to be included in the test boundary along with the need to gag the 1AF128 relief valve for purposes of testing.

Removing the existing weld and rewelding this joint in order to satisfy the SER additional NDE requirements (i.e., weld root pass surface examination) would have necessitated declaring the 13 Auxiliary Feedwater Pump inoperable and re-entering a 72-hour Technical Specification Action Statement, thus removing the pump from service for a second time.

On April 3, 1998, PSE&G performed a radiograph of the socket weld as an alternative to the weld root pass surface examination. The radiography revealed that there are no unacceptable discontinuities present in the weld root area, or in the through volume of the weld. The alternate use of the volumetric examination (i.e., RT) provides equal assurance of the integrity of the entire weld volume. Although, the substitution of this NDE method is not strictly in accordance with the specific provisions of the SER, the RT

**ATTACHMENT I**  
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demonstrates the weld root integrity and is clearly consistent with the intent of the supplementary NDE requirements imposed by the SER accepting ASME Code Case N-416-1.

The requirement to perform the weld root pass surface examination is not an ASME Code requirement, if it were, the Code (i.e., ASME Section XI IWA-2240) does allow for the substitution of NDE methods, provided that the results are demonstrated to the satisfaction of the Authorized Nuclear Inservice Inspector (ANII). The repair plan for this work and the associated radiographs of the weld involved have been reviewed by the ANII and found to be acceptable. All other provisions of the Code Case have been satisfied. This included performing a final weld surface penetrant examination in accordance with the 1992 Edition of ASME Section III Class 3, ND-5000 requirements and the performance of a Section XI System Leakage Test in accordance with ASME Section XI 1992 Edition.

The change to the SER provision to perform a root pass surface NDE, and alternately to perform a volumetric examination (i.e.; radiography) on this pressure boundary ASME Class 3 component, was found acceptable under the requirements of 10CFR50.59. Therefore, based on the above discussion, PSE&G has revised its commitment to the specific provisions contained in the SER, for this weld examination, and performed a volumetric examination (i.e.; radiography) on this pressure boundary ASME Class 3 component.