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Nuclear Business Unit

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

CLARIFICATION TO NRC SAFETY EVALUATION REPORT SALEM NUCLEAR GENERATING STATION LICENSE AMENDMENT NOS. 217 AND 199. DATED FEBRUARY 26, 1999 **SALEM GENERATING STATION UNITS 1 AND 2 FACILITY OPERATING LICENSES DPR-70 AND DPR-75 DOCKET NOS. 50-272 AND 50-311**

Gentlemen:

This letter clarifies the design and fabrication code requirements and the postinstallation test requirements for the Salem Outage Equipment Hatch (OEH), as described in Salem Nuclear Generating Station Units 1 and 2, License Amendment Nos. 217 and 199, Safety Evaluation Report. These license amendments modified Salem Technical Specification 3/4.9.4, Containment Building Penetrations to permit the use of equivalent methods to achieve containment closure for the Containment Equipment Hatch and for containment penetrations.

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The Safety Analysis Report for License Amendments 217 and 199 states that the design and fabrication of a device used as an equivalent method will be governed by American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section III for Class B Vessels, 1968. In a telephone conference held on March 3, 1999 between PSE&G licensing and engineering personnel and the U.S. NRC, Office of Nuclear Reactor Regulation (NRR), NRR staff personnel indicated that this statement was based upon the original design specification for the OEH that was informally provided to NRR. The original design specification for the Salem OEH specified that design and fabrication be in accordance with ASME Boiler and Pressure Vessel (B&PV) Code, Section III for Class B Vessels, 1968. The OEH design specification was subsequently revised to require that the design and fabrication of the OEH be governed by B&PV Code, Section VIII, 1989 edition or later, and the OEH was designed and fabricated to that code requirement. This revision was made because the original requirement to design and fabricate the OEH in accordance with ASME Boiler and

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Pressure Vessel (B&PV) Code, Section III for Class B Vessels, 1968 exceeded the design code requirements for the Containment Equipment Hatch inside door.

The design objective of the Salem Containment Equipment Hatch inside door is to support the design function of the containment to prevent the release of radioactive material to the outside atmosphere following a loss of coolant accident (LOCA). The LOCA is postulated to occur in Modes 1 through 4. To support that design objective, the Containment Equipment Hatch inside door was designed as a pressure retaining component in accordance with 1968 edition of the ASME B&PV Code, Section III for Class B vessels. The code was used as a guide; therefore the N-stamp requirement was waived. The stresses and welding for the containment equipment hatch inside door were accomplished in accordance with ASME Unfired Pressure Vessel Code, Section VIII.

The design objective of the Salem OEH is to provide containment closure equivalent to the Containment Equipment Hatch inside door (installed with a minimum of four bolts) during Modes 5 and 6 when containment pressurization is not likely. To support that design objective, the OEH was designed and fabricated in accordance with ASME B&PV Code Section VIII, 1989 edition. PSE&G considers this to be appropriate and equivalent considering the design and fabrication code requirements of the Containment Equipment Hatch inside door.

The Safety Analysis Report for License Amendments 217 and 199 further stated that the OEH would be leak tested following installation. PSE&G does not intend to perform a leak test on the OEH following installation. A requirement to perform leakage testing following OEH installation was not included in our license submittal. The OEH will be installed in accordance with an approved procedure. This procedure will require that OEH be aligned to ensure that the double gasketed seal is properly seated and aligned. The procedure requires that the OEH attachment swing bolts be properly installed and torqued to specified torque values in accordance with a specified torquing pattern. Finally, the procedure requires that the seal between the OEH and the Containment Equipment Hatch barrel be checked to verify that no air gaps exist that would compromise containment closure.

PSE&G requests confirmation of your concurrence with these clarifications.

Should you have any questions please do not hesitate to contact us.

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Sincerely,

D. R. Powell

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Director -

Licensing/Regulation and Fuels

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