



Public Service Electric and Gas Company 80 Park Place Newark, N.J. 07101 Phone 201/622-7000

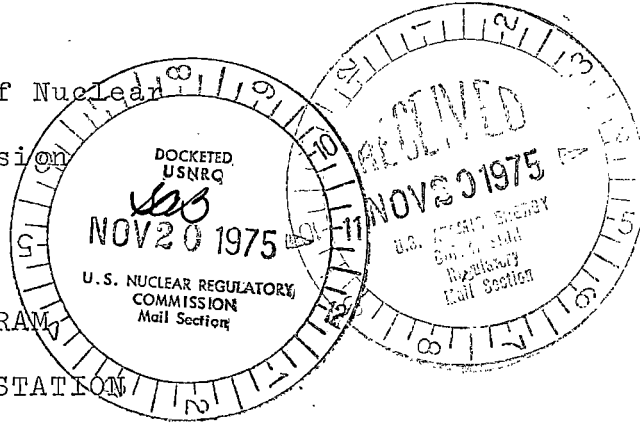
Regulatory

File Clk

November 14, 1975

50-272  
50-311

Mr. Bernard Rusche  
Director of the Offices of Nuclear  
Reactor Regulation  
Nuclear Regulatory Commission  
Washington, D. C. 20555



Dear Sir:

INSERVICE INSPECTION PROGRAM  
NO. 1 AND 2 UNITS  
SALEM NUCLEAR GENERATING STATION  
AUTHORIZATION A-6267

Preoperational baseline examination of Salem No. 1 is presently being conducted in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1971 edition to Winter 1972 addenda, to the extent practicable. This edition of the Code references Appendix IX of Section III of the Code for non-destructive examination procedures. Paragraph IX-3451.1(c)(3) of Appendix IX of the 1971 edition of Section III states that "transfer mechanisms shall be used to correlate the responses from the basic calibration block and from the production material", in ultrasonic examination.

Southwest Research Institute, who is under contract to Public Service Electric and Gas Company to perform the major portion of the preservice examination, contends that the use of transfer method to adjust ultrasonic equipment sensitivity level has been found to be accompanied by inherent inaccuracies and they have waived the requirement in their UT procedures. They advise us that verbal permission has been granted by the NRC to waive the requirement and in recent revisions of their UT procedures cite ASME Code Case 1698 to further support their position. However, Code Case 1698 is too recent to have been included in the latest revisions of Regulatory Guides 1.84 and 1.85 (June 1975) and we have no written evidence in our possession of the NRC's acceptance of this position.

We request that you confirm to us that the waiving of sub-subparagraph IX-3451.1(c)(3) of Appendix IX of ASME Section III, 1971 edition, has been approved by the NRC.

Very truly yours,

R. D. Rippe  
Chief Mechanical Engineer  
Engineering Department

13242

JER,RFB:pac

The Energy People  
Clarence Lautzenheiser, SwRI  
Wayne Flach, SwRI