

Public Service
Electric and Gas
Company

Steven E. Miltenberger

Public Service Electric and Gas Company P.O. Box 236, Hancocks Bridge, NJ 08038 609-339-4199

Vice President and Chief Nuclear Officer

May 26, 1988

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

Gentlemen:

INSERVICE INSPECTION PROGRAM
ASME SECTION XI, EXAMINATION CATEGORY B-A RELIEF REQUESTS
HOPE CREEK GENERATING STATION
DOCKET NO. 50-354

In your letter of December 11, 1987, the Hope Creek Generating Station Inservice Inspection (ISI) Program for the First 10-year Interval was determined to be acceptable and in compliance with 10CFR50.55a(g)(4). All submitted relief requests were granted except for three concerning reactor vessel welds to be examined pursuant to ASME Section XI, Table IWB-2500-1, Examination Category B-A. The NRC Safety Evaluation Report (SER) attached to the aforementioned letter indicates that these relief requests were not granted and that "...the procedure for the examination of these welds is under review by the regulatory staff at this time."

Although the staff does not agree at this time with the statements made in the INEL Technical Evaluation Report (TER) EGG-SD-7829 attached to the SER regarding these reactor pressure vessel weld examinations, certain statements cannot be ignored with regard to PSE&G's ability to perform the examinations in accordance with the letter of the Code. In particular, the INEL TER statement that "...the reactor pressure vessel would have to be redesigned and refabricated in order to complete the remainder (of the examinations)" is not a matter of interpretation.

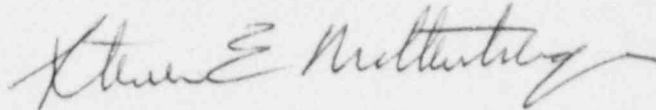
While PSE&G acknowledges the staff's prerogative to assess weld examination procedures before establishing a formal position, we ask that these relief requests remain under consideration while the procedures are reviewed until a firm NRC position is developed and a practical means for licensee compliance has been established. Until that time, PSE&G contends that our prescribed program will accomplish volumetric examination of these welds to the maximum extent practical. PSE&G also contends that 100% volumetric examination of these welds cannot practically be performed and that specific compliance with the requirements of ASME Section XI would result in undue hardship and unusual difficulties without a compensating increase in the level of quality and safety.

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Your cooperation in this matter is appreciated. Should you have any further questions with regard to this submittal, please do not hesitate to contact us.

Sincerely,



- C Mr. G. W. Rivenbark
USNRC Licensing Project Manager

- Mr. G. W. Meyer
USNRC Senior Resident Inspector

- Mr. W. T. Russell, Administrator
USNRC Region I

- Mr. D. M. Scott, Chief
Bureau of Nuclear Engineering
Department of Environmental Protection
380 Scotch Road
Trenton, NJ 08628