From:	James Kim
Sent:	Tuesday, January 3, 2023 11:06 AM
To:	Thomas, Brian J.
Cc:	Montgomery, Richard; Wiwel, Michael; Hipo Gonzalez
Subject:	Final NVIB RAI regarding Salem Unit 2 Relief Request for 4th ISI Interval (EPID: L-2022-LLR-0066)
Attachments:	NVIB RAI - Salem 4th ISI Interval Relief Request.docx

SUBJECT: Salem 2 - Final NVIB RAI regarding Relief Request for 4th ISI Interval (EPID: L-

2022-LLR-0066) (EPID L-2022-LLR-0066)

Mr. Thomas,

By letter dated September 27, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession ML22270A326), PSEG Nuclear, LLC, (the licensee) requested relief in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii) from the requirement of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI. Relief request S2-I4R-211, Revision 0 pertains partially to the examination coverage of ASME Code Class 1 piping welds in the fourth 10-year inservice inspection (ISI) interval of the Salem Unit 2.

The NRC staff has determined that additional information is needed to complete its review of the request. On January 3, 2023, the NRC staff sent PSEG the draft Request for Additional Information (RAI) from the Vessels and Internals Branch (DNRL/NVIB). On January 3, 2023, the licensee informed that a clarification call was not required and PSEG agreed to provide the RAI responses by February 6, 2023. A publicly available version of this final RAI (attached) will be placed in the NRC's ADAMS.

James Kim
Project Manager –Salem
NRR/DORL/LPL1
301-415-4125

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From: James Kim

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Tracking Status: None

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Options
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Reply Requested: No
Sensitivity: Normal
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REQUEST FOR ADDITIONAL INFORMATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELIEF REQUEST S2-I4R-211
ALTERNATE EXAMINATION COVERAGE OF WELDS
SALEM GENERATING STATION UNIT 2
PSEG NUCLEAR LLC
DOCKET NO. 50-311

By letter dated September 27, 2022 (Agencywide Documents and Access Management System (ADAMS) Accession No. ML22270A326), PSEG Nuclear LLC (the licensee) requested relief from the examination coverage requirement of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, at Salem Generating Station Unit 2. Pursuant to Title 10, Code of Federal Regulations, Part 50.55a (10 CFR 50.55a(g)(5)(iii)), the licensee submitted Relief Request S2-I4R-211 for Nuclear Regulatory Commission (NRC) review and approval on the basis that the required examination coverage is impractical due to physical obstructions and limitations imposed by design, geometry, and materials of construction of the subject components. The relief request presents welds that were inspected during the fourth 10-year interval for which relief from the ASME Code examination coverage requirement is being requested. To complete its review, the NRC staff requests additional information as follows.

2.0 REGULATORY BASIS

The regulation in 10 CFR 50.55a(g)(5)(iii) states that. "…If the licensee has determined that conformance with a code requirement is impractical for its facility, the licensee shall notify the [Nuclear Regulatory Commission (NRC)] and submit, as specified in Section 50.4, information to support the determinations. Determinations of impracticality in accordance with this section must be based on the demonstrated limitations experienced when attempting to comply with the code requirements during the inservice inspection interval for which the request is being submitted. Requests for relief made in accordance with this section must be submitted to the NRC no later than 12 months after the expiration of the initial or subsequent 120-month inspection interval for which relief is sought."

Pursuant to 50.55a(g)(6)(i), Impractical ISI Requirements: Granting of Relief, the Commission will evaluate determinations under paragraph (g)(5) of 10 CFR 50.55a, that ASME code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines are authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

3.0 Request for Additional Information

RAI-1

Issue
Table 1 of Attachment 1 of the alternative request shows that the examination coverage achieved for the lower head disc to the peel segments circumferential weld 2-RPV-3443 was

27.9 % of the required volume. The NRC staff understands that this low examination coverage was caused by the inference of the incore instrumentation nozzles.

Request
Discuss whether as part of the ultrasonic examination of weld 2-RPV-3443, a visual inspection was performed on the weld to ensure the surface of the portion of the weld that was not examined is not degraded, if a visual inspection was achievable.

RAI-2

Issue
In Attachment 1 of the alternative request, the licensee reported that the following four welds have recordable indications that were not recorded during previous examinations--2-RPV-10442 (W13), 2-RPV-1442B (W02), 2-RPV-3442B (W09), and 2-RPV-3442C (W10). The licensee stated that these indications originated during the manufacturing process.

Request
(1) Discuss whether these four welds will be volumetrically examined in the future ISI intervals to monitor potential growth of the indications. If not, provide justifications.
(2) Discuss why these indications were not identified in the previous examinations.