August 11, 2000

MEMORANDUM TO: James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Robert J. Fretz, Project Manager, Section 2 ***/RA/***
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: SALEM GENERATING STATION, ELECTRONIC TRANSMISSION, LICENSEE'S RESPONSE TO ISSUES TO BE DISCUSSED IN AN UPCOMING CONFERENCE CALL (TAC NO. MA8600 AND MA8601)

The attached information was received by electronic mail on August 4, 2000, from the Public Service Electric & Gas Company (PSE&G or the licensee). This information was transmitted to facilitate an upcoming telephone call in order to clarify the licensee's relief request dated March 17, 2000, which requested approval to incorporate ASME Code Case N-597 into the Salem Generating Station Inservice Inspection program. This memorandum and the attachment does not convey or represent an NRC staff position.

Docket Nos. 50-272 and 50-311

Attachment: PSE&G Response to Additional Clarification Questions based on Supplemental Response dated July 7, 2000, and review of site procedure SC.DE-AP.ZZ-0055(Q) Rev 3

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Additional Clarification Questions based on Supplemental Response dated July 7, 2000 and copy of procedure SC.DE-AP.ZZ-0055(Q) Rev 3

- **Is B.31.1, "Power Piping Code", the design code for the feedwater elbow and, if so, are there additional owner's requirements?**

    - ANSI B31.1 is the design code for the Salem Feed Water system. ANSI B31.7 is also applicable for the materials, fabrication, examination, testing and quality control requirements. B31.1 is used only for the design. In addition, the design specification establishes the following additional "Owner Requirements". The piping system is officially classified as Class 2 (for functional consideration), however, materials, fabrication, examination and quality control requirements shall be Class 1 (ANSI B31.7)

- **Page 24 of 38, 5.2.6.a.2 and 3: Clarify that there are Section III piping at Salem and that "repairs and replacements" meet IWA 4000 and that Section III piping "replacements" should meet IWA 7000.**

    - There are some piping systems and components at Salem Unit 1 and Unit 2 that were constructed in accordance with ASME Section III. The Feed Water system was not. Essentially, all of Hope Creek was constructed in accordance with ASME Section III. Irrespective of the original construction code(s) employed for either station, all repairs and replacements are performed in accordance ASME Section XI, IWA-4000 and IWA-7000 respectively, along with the use of supplementary Owner Requirements. IWA-4000 and IWA-7000 and Owner Requirements are also employed for any system modifications.

- **Page 25 of 38, 5.2.6.a.6 "For replacements where chromium-molybdenum is being used, the need for pre- and post-weld heat treatments should be considered and resolved prior to the replacement..."**

  Does this meet the requirement for where pre- and post-weld heat treatments from the construction code?

    - The material used for replacement of FAC degraded piping is SA-335 P22 (piping) and SA-182 F-22 or SA-234 WP22 (fittings). All of these materials are classified for welding as P5A. P5A materials require either a pre-heat of 300 ^{0} F for weld joints on items up to 4" NPS or require a PWHT. This is in accordance the both the piping specification(s) and original construction codes.

- **Page 25 of 38, 5.3.1.a. "...an examination package should be assembled which includes UT data sheets..."**

  "Should" must be changed to "shall" for safety related components seeking relief under this code case.

    - Internal to PSEG, in accordance with Nuclear Administrative procedure NC.NA-AP.ZZ-0001(Q) section 7.2, the terms Shall, Should and May are defined for global usage in all controlled procedures. The definitions are as follows:

"Shall is to be adhered to without exception. It can be either a regulatory requirement, commitment or Nuclear Business requirement."

"Should denotes a management expectation that is to be adhered to unless Supervision determines otherwise."

From an internal implementation perspective, the use of the word "should" is appropriate, since there is no direct regulatory requirement or License commitment associated with the assembly of the UT data, cited on Page 25 of 38, section 5.3.1.a. The use of this term however should not be misconstrued by the reader as being an activity that may be casually dismissed or waived. The use of these two different terms is simply a mechanism to distinguish actions that have a direct regulation or License commitment basis versus those which do not.

- **Page 26 of 38, 5.3.2 "...FAC sponsor engineer should summarize and transmit... results of the component evaluations..."**

  "Should" must be changed to "shall" for safety related components.

  - Internal to PSEG, in accordance with Nuclear Administrative procedure NC.NA-AP.ZZ-0001(Q) section 7.2, the terms Shall, Should and May are defined for global usage in all controlled procedures. The definitions are as follows:

    "Shall is to be adhered to without exception. It can be either a regulatory requirement, commitment or Nuclear Business requirement."

    "Should denotes a management expectation that is to be adhered to unless Supervision determines otherwise."

    From an internal implementation perspective, the use of the word "should" is appropriate, since there is no direct regulatory requirement or License commitment associated with the summary and transmittal of evaluations, cited on Page 26 of 38, section 5.3.2. The use of this term however should not be misconstrued by the reader as being an activity that may be casually dismissed or waived. The use of these two different terms is simply a mechanism to distinguish actions that have a direct regulation or License commitment basis versus those which do not.

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ORIGINATOR: R. Fretz

SECRETARY: N/A

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*******ROUTING LIST*******

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1. R. Fretz	/ /
2. Secretary - Dispatch	