

FEB 9 2001

LRN-00-0503



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

Gentlemen:

**INSERVICE INSPECTION PROGRAM
RELIEF REQUEST RR-B9
SALEM GENERATING STATIONS
FACILITY OPERATING LICENSES DPR-70 AND DPR-75
DOCKET NOS. 50-272 AND 50-311**

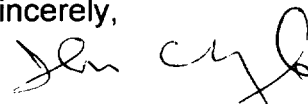
Pursuant to 10 CFR 50.55a(a)(3)(ii), PSEG Nuclear LLC requests relief from a requirement of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for Salem Generating Stations. Specifically, PSEG Nuclear is requesting relief from Code Case N-498-1 system pressure test hold time of 4 hours for the insulated portions of the Safety Injection system pump discharge piping on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

The attachment to this letter includes the proposed alternative and supporting justification for the relief. Based on the evaluation contained in the attachment, PSEG Nuclear has concluded that the proposed alternative provides an acceptable level of quality and safety. Accordingly, this proposal satisfies the requirements of 10 CFR 50.55a(a)(3)(ii).

PSEG Nuclear requests that the NRC approve this relief request by April, 2001 in order to support the Salem Unit 1 outage currently scheduled to begin April 7, 2001.

Should you have any questions regarding this request, please contact Mr. Howard Berrick at 856-339-1862.

Sincerely,


for G. Salamon
Manager – Licensing

Attachment: ISI Relief Request No. RR-B9

AD-47

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**PSEG NUCLEAR LLC
SALEM GENERATING STATION
ISI RELIEF REQUEST RR-RR-B9**

COMPONENT DESCRIPTION:

Insulated portions of Safety Injection (SJ) pump discharge piping and associated vents and drains.

ASME CODE CLASS:

ASME Section XI Class 1 and Class 2 components

ASME SECTION XI EXAMINATION REQUIREMENTS:

ASME Section XI Code Case N-498-1 was approved for ISI application in Regulatory Guide 1.147 and for use at Salem Generating Station by NRC letter dated March 17, 1995. Code Case N-498-1 allows a system pressure test to be performed at nominal operating pressure on Class 1 and Class 2 components as an alternative to the ten year system hydrostatic test required by ASME, Section XI Table IWB-2500-1, Category B-P (for Class 1), and Table IWC-2500-1, Category C-H (for Class 2). However, the system pressure test alternative provided by the Code Case requires a four-hour hold time at nominal operating pressure before performing the required visual examination for components that are partially insulated (approximately 10% of the piping). Since the components identified above are partially insulated, a four-hour hold time would be required for this test.

BASIS FOR RELIEF:

Pursuant to 10 CFR 50.55a(a)(3)(ii), PSEG Nuclear is requesting relief on the four hour hold time requirement on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

As part of the Emergency Core Cooling System (ECCS), the SJ system is not required to operate during normal plant operation. However, the system is periodically tested in accordance with applicable requirements. These periodic tests are conducted to verify the operability of the applicable components. The functional test of the SJ pumps normally includes about sixty minutes of pump run time. In order to satisfy the hold time requirement of Code Case N-498-1, the test would require a SJ pump run in excess of 4 hours (hold time plus examination time).

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Running the SJ pump for this duration represents an undue hardship on the facility without a compensating increase in the level of quality and safety. Operating the SJ pump for the period of time required to satisfy the four hour hold time on recirculation, would cause overheating of the pump, due to low recirculation flow.

Removal of the insulation from the subject components in order to use the ten minutes hold time allowed by Code Case N-498-1 would be equally burdensome. The costs associated with insulation removal and reinstallation, including resource diversion, radiation exposure and additional radwaste, are not justified by a compensating increase in the level of quality and safety.

Performing an SJ system hydrostatic test would also be burdensome. A hydrostatic test would require installation of blank flanges and temporary pipe supports, and gagging or removal of relief valves. The time, costs and radiation exposure incurred in carrying out a hydrostatic test would result in a hardship without a compensating increase in the level of quality and safety.

ALTERNATIVE EXAMINATION:

The system pressure test described in Code Case N-498-1 will be conducted as required, except that a sixty-minute hold time will be used in lieu of the four-hour hold time requirement. The sixty-minute hold period will allow time for potential leaks to migrate through the insulation without over heating the SJ pump.