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PSEG Nuclear LLC

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DELAY OF INSERVICE INSPECTION PROGRAM EXAMINATIONS
SALEM GENERATING STATION UNITS NO. 1 AND 2
DOCKET NOS. 50-272 AND 50-311
FACILITY OPERATING LICENSE NOS. DPR-70 AND DPR-75

References:
1. Letter W. H. Bateman (NRC) to G. L. Vine (EPRI) October 28, 1999, *Safety Evaluation Report Related to EPRI Risk-Informed Inservice Inspection Procedure (TR-112657, Rev. B)*
2. LRN-01-0310, G. Salamon (PSEG) to NRC dated September 25, 2001, *Salem Unit 1 Third Ten-Year Inservice Inspection Program Submittal*
3. LRN-01-0060, G. Salamon (PSEG) to NRC dated February 12, 2001, *Inservice Inspection Activities 90 Day Report, 2R11*

Gentlemen:

PSEG Nuclear LLC (PSEG) plans to delay performance of currently scheduled ASME Section XI class 1 and 2 Inservice Inspection (ISI) piping examinations at Salem Generating Station Units 1 and 2 by one refueling cycle. The total number of required examinations will be conducted during the second of two refueling outages during the inspection period, rather than the normal practice of performing half at each outage, thereby retaining full compliance with ASME Section XI inspection requirements. Since Code compliance is maintained, PSEG believes that a formal request for relief from NRC requirements is not needed. This delay allows for the preparation, approval and implementation of a Risk Informed ISI (RI-ISI) program at each Unit.

NRC Information Notice 98-44, *Ten-Year Inservice Inspection (ISI) Program Update for Licensees that Intend to Implement Risk-Informed ISI of Piping,* states that the staff will consider authorizing a delay of up to two years in implementation of the next ten-year ISI program in order to allow sufficient time to develop and obtain approval for a RI-ISI program. Other Code requirements

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(e.g., supports, class 3 inspections, pressure testing, repairs and replacements, etc.) will be conducted as required per current inservice inspection program requirements.

PSEG Nuclear intends to submit RI-ISI programs for Salem Generating Station Units 1 and 2, class 1 and 2 systems, in September 2002 in accordance with the alternative provision of 10 CFR 50.55a (a)(3)(i). This submittal will be based upon the risk-informed methodology of EPRI Technical Report TR-112657, Rev. B-A, accepted by the NRC in a letter and supporting Safety Evaluation Report dated October 28, 1999 (Ref. 1). Subsequent implementation of RI-ISI for ASME XI Categories B-F, B-J, C-F-1 and C-F-2 is expected to eliminate many inspections and contribute to significantly reduced accumulated personnel exposure, greater focus for risk significant welds, increased efficiency for inservice inspections and cost savings.

Salem Unit 1

Salem Unit 1 satisfactorily completed its second ten-year inspection interval on May 19, 2001 (ASME XI 1983 Edition through Summer 1983 Addenda).

By letter LRN-01-0310 dated September 25, 2001 (Ref. 2), PSEG submitted its third interval inservice inspection program for Salem Unit 1, commencing with refueling outage 1R15 in the Fall of 2002. That submittal did not incorporate risk informed methodology. A revision to the inservice inspection program will be made to reflect risk informed methodology.

PSEG will modify the third interval's examination schedule for piping categories B-F, B-J, C-F-1, C-F-2 such that all required first period inspections will be performed during the second of the two refueling outages scheduled for the period (1R16 in Spring 2004). This maintains full compliance with the inspection completion percentages for the period required by ASME Section XI, Articles IWB-2412 and IWC-2412. Scheduling in this manner will coincide with the expected implementation date of the RI-ISI program and will avoid any lapses in the inspection cycle.

Other Code required examinations (e.g., supports, class 3 inspections, pressure testing, repairs and replacements, etc.) will continue to be conducted as required by the inservice inspection program.

Salem Unit 2

Completion of the Salem Unit 2 second inspection interval, second period, has resulted in ASME XI 1986 Edition IWB-2412 and IWC-2412 requirements being met for Category B-F, B-J, C-F-1 and C-F-2 piping welds, as documented in letter LRN-01-0060 (Ref. 3).

Salem Unit 2 is scheduled to complete its second inspection interval in the Fall of 2003 after refueling outage 2R13. Salem Unit 2 has yet to perform any third period inspections. Two refueling outages remain in the third period, with the next outage (2R12) currently scheduled for the Spring 2002.

PSEG Nuclear intends to delay Salem Unit 2 ISI piping examinations for Categories B-F, B-J, C-F-1 and C-F-2 required during the third period of the second inspection interval, until the second of two outages during that period. The delay will permit sufficient time for the preparation, submittal and NRC review of the Salem Unit 2 RI-ISI program for piping. PSEG plans to complete the second inspection interval by implementing RI-ISI during the final refueling outage of the third period, currently scheduled for Fall 2003. Other Code required examinations (e.g., supports, class 3 inspections, pressure testing, repairs and replacements, etc.) will continue to be conducted as required per the current inservice inspection program's requirements.

The Salem Unit 2 RI-ISI Program submittal will incorporate a mid-interval implementation. Such an approach is addressed in the NRC's SER associated with EPRI risk informed ISI, report TR-112657, Rev. B-A. The only caveat is maintenance of an examination schedule "consistent with the interval requirements contained in Article IWA-2000 of ASME Section XI as applied to Inspection Program B." Such a schedule will be maintained.

Conclusions

PSEG intends to delay performance of the Salem Unit 1 third ISI interval, first period, for piping examination Categories B-F, B-J, C-F-1 and C-F-2 scheduled during the first refueling outage of the period (1R15) until the second outage (1R16). This will result in delaying a portion of first period inspections approximately 20 months, from September 2002 until May 2004, but still remaining within the period.

For Salem Unit 2, PSEG intends to delay the second interval, third period ISI examinations for Categories B-F, B-J, C-F-1 and C-F-2 scheduled during the first refueling outage of the period (2R12) until the second outage (2R13). This will result in delaying a portion of third period inspections approximately 18 months, from April 2002 until October 2003, also remaining within the period.

In both cases, all required Class 1 and 2 piping examinations would be performed during the second of two refueling outages planned for that period, therefore maintaining compliance with Code requirements. Other Code examinations (e.g., supports, class 3 inspections, pressure testing, repairs and replacements, etc.) will be conducted as required per the current inservice inspection program's requirements. Since compliance with ASME Section XI is

maintained, PSEG believes that a formal request for relief from NRC requirements is not needed. The delay will permit sufficient time for the preparation, submittal and NRC review of each unit's RI-ISI program for piping.

Please direct any comments or questions to Carl Berger at (856) 339-1432.

Sincerely,

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