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OCT 31 2005

LR-N04-0473



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

**SALEM GENERATING STATION – UNIT 1
DOCKET NO. 50-272
FACILITY OPERATING LICENSE NO. DPR-70
RELIEF REQUEST SC-I3-RR-A14 SYNCHRONIZATION OF SALEM UNITS 1 AND 2
ISI PROGRAMS TEN-YEAR INSERVICE INSPECTION INTERVALS**

In accordance with the provisions of 10 CFR 50.55a(a)(3), PSEG Nuclear LLC (PSEG) hereby transmits a request to use an alternative to the requirements of 10 CFR 50.55a(g)(4)(ii) and American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI, Subparagraph IWA-2430 (d). Licensees are required to revise and update their Inservice Inspection (ISI) Programs every 120 months to the latest edition and addenda of Section XI of the ASME Code referenced in 10 CFR 50.55a as of twelve months prior to the start of a new inspection interval.

The attached proposed alternative for ISI proposes extending the third Ten-Year Interval for Salem Generating Station Unit 1 and aligning the date for commencing the fourth Ten-Year Interval with Salem Generating Station Unit 2. Altering the start date of the interval for Unit 1 will allow PSEG ISI processes and procedures for both units to meet the same requirements of the applicable edition and addenda of ASME Section XI.

Should you have any questions regarding this request, please contact Mr. Paul Duke at (856) 339-1466.

Sincerely,

A handwritten signature in black ink that reads "Thomas P. Joyce".

Thomas P. Joyce
Site Vice President
Salem Generating Station

Enclosure:
Relief Request SC-I3-RR-A14

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OCT 31 2005

C Mr. S. Collins, Administrator - Region I
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475 Allendale Road
King of Prussia, PA 19406

U. S. Nuclear Regulatory Commission
Mr. S. Bailey, Project Manager - Salem Unit 1 and Unit 2
Mail Stop 08B1
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USNRC Senior Resident Inspector – Salem (X24)

Mr. K. Tosch, Manager IV
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P. O. Box 415
Trenton, NJ 08625

Relief Request SC-I3-RR-A14

Proposed Alternative to Align Unit 1 and Unit 2
Ten-Year Inservice Inspection Intervals

Relief Requested

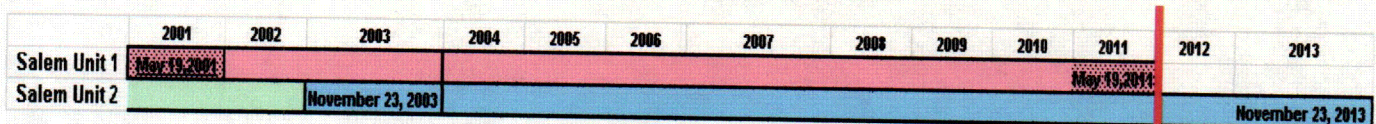
Pursuant to the requirements of 10CFR50.55a(a)(3)(i) and (ii), PSEG Nuclear LLC (PSEG) requests use of a proposed alternative to the requirements of 10 CFR 50.55a(g)(4)(ii) and American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI, Subparagraph IWA-2430 (d) for updating the Salem Units 1 and 2 Inservice Inspection (ISI) Programs on a frequency required by ASME Section XI and the Code of Federal Regulations. PSEG requests that the start date for the Unit 1 fourth Ten-Year ISI Interval be aligned with that of Unit 2 so that both commence on November 23, 2012. Paragraph IWA-2432 requires each inspection interval to consist of ten-year duration; except as modified by IWA-2430 (d) which permits the inspection interval to be extended or decreased by as much as one year, provided that successive intervals are not altered by more than one year from the original pattern of intervals.

Basis for Relief

The Salem Generating Station Unit 1 first Ten-Year ISI Interval started July 11, 1977 with the issuance of the Operating License and ended February 27, 1988. This interval included 7 Months and 16 Days to coincide with end of refueling outage per the 1974 Edition with summer 1975 Addenda of IWA-2400. The second Ten-Year ISI Interval commenced on February 27, 1988 and ended May 19, 2001. This interval excluded 36 Months and 10 Days (April 7, 1995-April 17, 1998) for extended shutdown, and 2 Months and 13 days to coincide with end of the refueling outage per the 1983 Edition with summer 1983 Addenda of IWA-2412 (b).

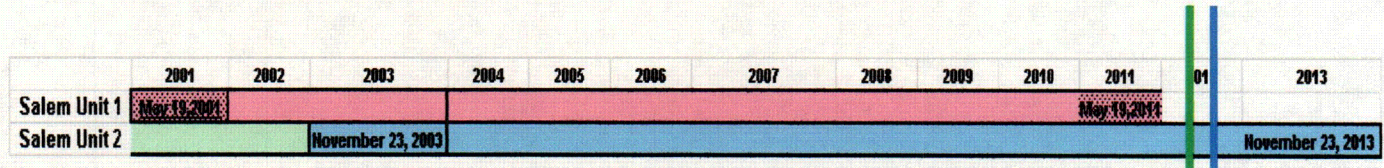
The Salem Generating Station Unit 2 first Ten-Year ISI Interval started October 13, 1981 with the issuance of the Operating License and ended May 10, 1992. The second Ten-Year ISI Interval commenced on May 10, 1992 and ended November 23, 2003. This interval excludes 26 Months and 21 Days (June 8, 1995-August 29, 1997) for an extended shutdown, and 7 Months and 16 days to coincide with the end of the refueling outage per the 1986 Edition of IWA-2430 (d)(3).

The illustration below depicts the current schedule of Salem Units 1 and 2 third Ten-Year ISI intervals.



Relief Request SC-I3-RR-A14

On May 19, 2011, Salem Unit 1 is scheduled to conclude its third Ten-Year ISI interval. On November 23, 2013, Salem Unit 2 is scheduled to conclude its third Ten-Year ISI interval.



If Salem Unit 1 and 2 take advantage of the combined benefits of ASME Section XI paragraph IWA-2430 (d)(3) permitting the inspection interval to be extended or decreased by as much as one year, Salem Unit 1 would conclude its third Ten-Year ISI interval on May 19, 2012 and Salem Unit 2 would conclude its ISI interval November 23, 2012. This would still result in approximately 6.5 months separation. Alignment of end of the third Ten-Year ISI interval for both Salem units is not possible without exceeding ASME Section XI paragraph IWA-2430 (d)(3) requirements. Unless relief is granted, Salem Units 1 and 2 successive ten-year inservice inspection intervals will not coincide because 10 CFR 50.55a(g)(4)(ii) states "Inservice examination of components and system pressure tests conducted during successive 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section 12 months prior to the start of the 120-month inspection interval, subject to the limitations and modifications listed in paragraph (b) of this section."

Maintaining both Salem units to the same edition of the ASME Code and schedule has distinct advantages without any reduction in the level of quality or safety:

1. Site procedures will meet the requirements of one edition of the ASME Code instead of two different editions.
2. The ISI Programs can be written as one document covering both units.
3. The probability of applying a wrong inspection and/or test requirement is reduced.
4. Having one set of procedures and documents reduces the administrative burden of complying with the ISI requirements without a reduction in the level of quality of the ISI Programs.

With the proposed alternative schedule for Unit 1, the required third Ten-Year Interval (and following examinations and tests) will be completed. There will be no reduction in the number of ISI examinations as a result of the date change.

Relief Request SC-I3-RR-A14

Alternative Requirement

PSEG Nuclear proposes to align the end of each unit's third Ten-Year ISI interval and perform subsequent successive 120-month program update requirements per 10CFR50.55a(g)(4)(iv) commencing on November 23, 2012.

Justification of Relief

Altering the third ISI Ten-Year interval so that both Salem Unit 1 and Unit 2 end on the same date and begin the fourth ISI Ten-Year interval on the same date reduces the administrative costs and burden of complying with two different editions of the ASME ISI code. The possibility of working to the wrong procedures or documents (both NDE and administrative) is reduced because both units would be governed by the same edition of the ASME code.

The proposed action does not result in a reduction of examinations or tests and provides an acceptable level of safety and quality.

Implementation Schedule

The ISI Programs for Salem Units 1 and 2 will be updated and become effective on November 23, 2012. The new interval schedule will remain in effect for the fourth and subsequent Ten-Year intervals.

Precedent

The safety evaluation (TAC Nos. MB7564 and MB7565) issued to Prairie Island Nuclear Generating Plant, Docket Nos. 50-282 and 50-306, on October 2, 2003 approved a similar request.