



REGULATORY DOCKET FILE COPY

Public Service Electric and Gas Company 80 Park Place Newark, N.J. 07101 201/430-6468

Richard Fryling, Jr. Assistant General Solicitor

June 28, 1978

Mr. Victor Stello, Jr.
Director
Division of Operating Reactors
Office of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Request for 10CFR21 Exemption
No. 1 and 2 Units
Salem Nuclear Generating Station
Dockets 50-272 and 50-311

Dear Mr. Stello:

Pursuant to 10CFR 21.7, Public Service Electric and Gas Company requests an exemption from the requirements of 10CFR21 for the purchase of replacement parts and repair services from Fischer and Porter Company, Warminster, Pennsylvania for electronic transmitters. These transmitters are used in the control circuits for Salem Units 1 and 2. Since these transmitters were manufactured by Fischer and Porter, we cannot obtain replacement parts and repair service necessary for maintenance from any other supplier.

We were advised by Fischer and Porter that they will not accept any purchase order that specifies 10CFR21. It is therefore not possible to order the essential replacement parts for No. 1 Unit Salem. Fischer and Porter has rejected our orders imposing 10CFR21 for the following reasons:

1. Their subtier suppliers refuse to accept orders which include 10CFR21 as a requirement.

2006
1/10
ADD STENO
VASSALLO
1/23/80
DORR
1/23/80

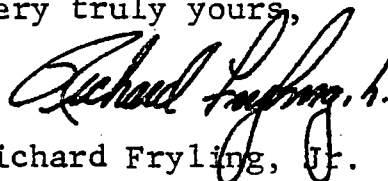
2. Although Fischer and Porter has internal control systems to assure that component parts meet acceptable quality requirements for use prior to their installation in transmitters, their record system does not permit traceability of individual component parts to transmitter purchasers. Fischer and Porter will not revise their record system to attain the necessary degree of traceability required for full compliance with 10CFR21.

These "off-the-shelf" generic type transmitters have been previously qualified for our intended use in Salem No. 1 and 2 safety related systems. The restoration of these transmitters through replacement of parts and repairs will not alter this qualified status.

PSE&G will evaluate any deviations found in Fischer and Porter transmitters and will report promptly to the NRC if it should be determined that a defect exists. We believe that this approach, which constitutes substantial compliance with 10CFR21 and with Section 206 of the Energy Reorganization Act of 1974, will not endanger life or property or the common defense and security and is in the public interest. In addition, the granting of the exemption will neither increase the probability or consequences of accidents previously considered nor decrease safety margins and, thus, does not involve a significant hazards consideration. Furthermore, the granting of the exemption will not result in any significant environmental impact.

A prompt favorable response would be greatly appreciated since we do not wish to delay test and startup of Unit 2 and we wish to avoid any possible impact upon the operation of Unit 1.

Very truly yours,



Richard Fryling, Jr.

CC Office of the Executive Legal Director
Nuclear Regulatory Commission
Washington, D. C. 20555