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LRN-00-0388

Docket Nos. 50-272, 50-311, &
50-354

Ms. Annette Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: NRC Request for Public Comments on the Union of Concerned
Scientists Petition of Rulemaking (65FR42305, July 10, 2000)

Dear Ms. Vietti-Cook:

PSEG LLC, as operator of the Salem and Hope Creek Generating Stations submits the following comments on the Union of Concerned Scientists Petition for Rulemaking that was published in the July 10, 2000, *Federal Register* and endorses the comments submitted on the same topic by the Nuclear Energy Institute (Anthony R. Pietrangelo, NEI to Ms. Annette Vietti-Cook, NRC dated September 22, 2000).

The Union of Concerned Scientists alleged, in a 10 CFR 2.206 petition filed on May 13, 2000, that the liquid and gaseous radwaste systems at Hatch Nuclear Plant are being operated outside their licensing and design bases. This petition was based upon UCS review of the Hatch license renewal application. The petition documents two contentions and requests the Commission to amend the regulations contained in 10 CFR Part 51 and Part 54.

The NRC should deny the request to amend the license renewal regulations based on the following:

The design and licensing basis of the liquid and gaseous radwaste systems are sufficiently conservative such that the required analyses demonstrate that the assumed catastrophic failure of components in the systems will result in doses substantially below 10 CFR Part 100 guidelines and within 10 CFR Part 20 guidelines. In other words, the radiological inventory in these systems is controlled and limited, and a postulated event or malfunction will not adversely impact public health or safety. Thus, there is no safety benefit to including these

Template = SECY-067

SECY-02
95-2168 REV. 7/99

OCT 05 2000

systems within the scope of license renewal for either aging management reviews (Part 54) or environmental impacts (Part 51).

In addition, we note that the NRC, in a June 20, 2000 letter to the petitioner, found no evidence to support the assertion that the liquid and gaseous radwaste systems at Hatch Nuclear Plant were being operated outside of their design and licensing basis. However, the NRC staff forwarded to the licensee all of the questions posed in the petition as a request for additional information. We believe this request was unwarranted based on the specious nature of the petition.

In conclusion, the design and licensing basis of the liquid and gaseous radwaste systems are sufficiently conservative such that the required analyses demonstrate that the assumed catastrophic failure of components in the systems will result in doses substantially below 10 CFR Part 100 guidelines and within 10 CFR Part 20 guidelines. The radiological inventory in these systems is controlled and limited, and a postulated event or malfunction will not adversely impact public health or safety. Thus, there is no safety benefit to including these systems within the scope of license renewal for either aging management reviews (Part 54) or environmental impacts (Part 51).

Sincerely,



Gabor Salamon

Manager – Licensing

JCN/