

State of New Jersey

Department of Environmental Protection

Division of Environmental Safety, Health, and Analytical Programs Radiation Protection Programs Bureau of Nuclear Engineering P. O. Box 415 Trenton, New Jersey 08625-0415 Tel (609) 984-7700

January 23, 2002

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

Dear Sir:

James E. McGreevev

Governor

Subject:

Salem Generating Station Units 1 and 2 Docket No. 50-272 and 50-311 License Change Request S01-05 Request to Eliminate the Post Accident Sampling System

PSEG requested a revision to the Technical Specifications for Salem Units 1 and 2 by letter to the NRC dated August 17, 2001. The proposed change will allow PSEG to eliminate the Post Accident Sampling System.

We noted, that in Attachment 1 to the August 17 letter, PSEG commits to develop and maintain contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump and containment atmosphere. In order to better understand the options available to PSEG to meet this commitment, we held a conference call with PSEG Chemistry and Licensing personnel on January 22, 2002. Based on this conversation, it is our understanding that post accident sampling will be performed, but sampling locations and the potential dose rates to sampling personnel are not yet known.

It is our expectation, that following an accident, the radionuclide mix be characterized within a reasonable length of time, say within 24 hours, by whatever means available. This mix must be defined prior to consideration of protective action recommendations being developed for ingestion pathway issues. We believe that the federal Department of Energy with their role in post accident radiation surveys and assessment would have similar needs.

Our concern is that the NRC has established no acceptance criteria associated with the development of these contingency plans. Our discussion with PSEG personnel

Bradley M. Campbell Acting Commissioner

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revealed that for other plants the time to define the mix of radionuclides available for release was as long as 7 days. Clearly, this would not meet our needs.

I would also recommend that the federal Department of Energy personnel be consulted as to their expectations for sampling. If you need to discuss the subject further, please contact Kent Tosch at (609) 984-7700 or Rich Pinney at (609) 984-7558.

Sincerely,

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Kent W. Tosch, Manager Bureau of Nuclear Engineering

Distribution

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