



NOV 21 2008

10CFR20.1703(b)

LR-N08-0249

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

Hope Creek Generating Station  
Facility Operating License No. NPF-57  
NRC Docket No. 50-354

Salem Generating Station, Units 1 and 2  
Facility Operating License Nos. DPR 70 and DPR-75  
NRC Docket Nos. 50-272 and 50-311

**Subject: Response to RAI - Request for Authorization to Use Delta Protection  
French Designed Respiratory Protection Equipment**

**Reference** (1) Letter from PSEG to NRC: "Request for Authorization to Use Delta  
Protection French Designed Respiratory Protection Equipment, Hope Creek  
Generating Station, Salem Nuclear Generating Station, Units 1 and 2," dated  
July 3, 2008

In Reference 1, PSEG Nuclear LLC (PSEG) submitted an authorization request, in accordance with the provisions of 10CFR20.1703(b), to (1) use French designed respiratory protection equipment that has not been tested and certified by the National Institute for Occupational Safety and Health (NIOSH), (2) take credit for an assigned protection factor of 2,000 for this equipment and (3) not provide standby rescue persons whenever this equipment is used.

The NRC provided PSEG a Request for Additional Information (RAI) on the authorization request. The response to the RAI is provided in Attachment 1 to this submittal. Regulatory commitments as a result of this submittal are identified in Attachment 2.

If you have any questions or require additional information, please do not hesitate to contact Mr. Jeff Keenan at (856) 339-5429.

Sincerely,

A handwritten signature in black ink, appearing to read "Christine T. Neely", written over a horizontal line.

Christine T. Neely  
Director-Regulatory Affairs

A.001  
HRR

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Attachments: (2)

C Mr. S. Collins, Administrator – Region I  
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USNRC Senior Resident Inspector – Hope Creek

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Commitment Coordinator – Salem

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PSEG Commitment Coordinator - Corporate

REQUEST FOR ADDITIONAL INFORMATION  
REGARDING REQUEST FOR AUTHORIZATION TO USE  
DELTA PROTECTION RESPIRATORY PROTECTION EQUIPMENT  
FOR  
HOPE CREEK GENERATING STATION  
AND SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-354, 50-272 AND 50-311

By letter dated July 3, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081980090), PSEG Nuclear LLC (PSEG or the licensee) requested authorization, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 20, Section 20.1703(b), for Hope Creek Generating Station and Salem Nuclear Generating Station, Unit Nos. 1 and 2, to: (1) use French-designed respiratory protection equipment that has not been tested and certified by the National Institute for Occupational Safety and Health; (2) take credit for an assigned protection factor of 2,000 for this equipment; and, (3) not provide standby rescue persons whenever this equipment is used.

The Nuclear Regulatory Commission (NRC) staff has reviewed your request and would like to discuss the following to clarify the submittal.

- 1) Page 2 of the cover letter states that PSEG will implement the following controls for use of the Mururoa V4 F1 and V4 MTH2 single use respiratory protection suits:
  1. The Mururoa V4 F1 and V4 MTH2 single use suit will be integrated into the PSEG respiratory protection programs using the information provided by the manufacturer.
  2. New lesson plans will be developed to train workers on Mururoa's features, donning, use and removal, cautions and use of mouth strip and tear off strips for routine and emergency egress.
  3. Radiation Protection personnel will be provided additional training for selection, approval, issue, equipment set-up, operation and maintenance instructions for the Mururoa suit.

Although Enclosure 1 to your submittal addressed some of the following issues, the cover letter did not specifically include the following controls in the above list of controls. Please address whether the following controls will also be implemented and, if not, provide justification:

1. The manufacturer's instructions for use and storage of the Delta Protection Mururoa V4F1 and V4 MTH2 suits will be integrated into the respiratory protection programs.
2. The Mururoa V4F1 and V4 MTH2 suits will be discarded after a single use and will not be used in atmospheres that are immediately dangerous to life and health (IDLH).
3. Any defects discovered will be entered into the Corrective Action Program and reported to the manufacturer, as necessary. Industry notifications, when required, will be made through the Operating Experience Program.

## **RESPONSE**

The latter list of three controls will be implemented. The controls listed in the July 3, 2008 cover letter were not all-inclusive; the complete discussion of controls related to implementation of the use of the Delta Protection Mururoa V4F1 and V4 MTH2 suits is provided in Enclosure 1, Sections 2.3.2 and 2.3.4, of the July 3, 2008 submittal. These controls are listed below, and are provided in Attachment 2 of this submittal as commitments PSEG is making related to use of the Delta Protection Mururoa V4F1 and V4 MTH2 suits.

1. The manufacturer's instructions for use and storage of the Delta Protection Mururoa V4F1 and V4 MTH2 suits will be adhered to and integrated into the respiratory protection programs, with the exception of "instructions for donning and removal", Attachment 2.5.5, Caution Step 2 (stand-by rescue person not required).
  2. New lesson plans will be developed to train workers on Mururoa's features, donning, use and removal, cautions and use of mouth strip and tear off strips for routine and emergency egress.
  3. Radiation Protection personnel will be provided additional training for selection, approval, issue, equipment set-up, operation and maintenance instructions for the Mururoa suit.
  4. The Mururoa V4F1 and V4 MTH2 suits will be discarded after a single use and will not be used in atmospheres that are immediately dangerous to life and health (IDLH).
  5. Any defects discovered with the Mururoa suit will be entered into the Corrective Action Program and reported to the manufacturer, as necessary. Industry notifications, when required, will be made through the Operating Experience Program.
- 2) As required by 10 CFR 50.34(b)(3), the Updated Final Safety Analysis Report (UFSAR) shall include information describing the means for controlling and limiting radiation exposures within the limits set forth in 10 CFR Part 20. Please provide a regulatory commitment to include the controls discussed in question 1 in the Hope Creek and Salem UFSARs upon implementation of the requested authorization.

**RESPONSE**

As discussed in the response to Question 1, PSEG is committing to establish appropriate controls related to implementation of the requested authorization. These controls will be included in the Hope Creek and Salem UFSARs, and be captured as commitments in the Commitment Management Program (see Attachment 2 of this submittal) to be integrated into appropriate procedures and programs.

## List of Regulatory Commitments

PSEG implement the following controls at the **Salem and Hope Creek** Generating Stations:

COMMITMENT	COMMITTED DATE	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes / No)	PROGRAMMATIC (Yes / No)
The manufacturer's instructions for use and storage of the Delta Protection Mururoa V4F1 and V4 MTH2 suits will be adhered to and integrated into the respiratory protection programs, with the exception of "instructions for donning and removal", Attachment 2.5.5, Caution Step 2 (stand-by rescue person not required).	March 31, 2009, upon NRC approval and subsequent implementation	No	Yes
New lesson plans will be developed to train workers on Mururoa's features, donning, use and removal, cautions and use of mouth strip and tear off strips for routine and emergency egress.	March 31, 2009, upon NRC approval and subsequent implementation	No	Yes
Radiation Protection personnel will be provided additional training for selection, approval, issue, equipment set-up, operation and maintenance instructions for the Mururoa suit.	March 31, 2009, upon NRC approval and subsequent implementation	No	Yes
The Mururoa V4F1 and V4 MTH2 suits will be discarded after a single use and will not be used in atmospheres that are immediately dangerous to life and health (IDLH).	March 31, 2009, upon NRC approval and subsequent implementation	No	Yes
Any defects discovered with the Mururoa suit will be entered into the Corrective Action Program and reported to the manufacturer, as necessary. Industry notifications, when required, will be made through the Operating Experience Program.	March 31, 2009, upon NRC approval and subsequent implementation	No	Yes
The above five (5) controls will be included in the Hope Creek and Salem UFSARs.	March 31, 2009, upon NRC approval and subsequent implementation	Yes	No