

September 3, 2009

MEMORANDUM TO: Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager */ra/*
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2,
DRAFT REQUEST FOR ADDITIONAL INFORMATION
(TAC NOS. ME1279 AND ME1280)

The attached draft request for information (RAI) was transmitted on September 3, 2009, to Mr. Jeff Keenan of PSEG Nuclear LLC (the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's amendment request for Salem Nuclear Generating Station (Salem), Unit Nos. 1 and 2, dated April 9, 2009. The proposed amendment would relocate Technical Specification (TS) requirements pertaining to communications during refueling operations (TS 3/4.9.5), manipulator crane operability (TS 3/4.9.6), and crane travel (TS 3/4.9.7) to the Technical Requirements Manual.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-272 and 50-311

Attachment: Draft RAI

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PDI-2 Reading

RidsNrrDorlLpl1-2 Resource

RidsNrrDorlDpr Resource

RidsNrrPMHopeCreek Resource

SJones, SBPB

RGrover, ITSB

ACCESSION NO.: ML092460678

OFFICE	PDI-2/PM
NAME	REnnis
DATE	9/3/09

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED LICENSE AMENDMENT

RELOCATION OF REQUIREMENTS FOR REFUELING OPERATIONS

SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-272 AND 50-311

By letter dated April 9, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML091340092), PSEG Nuclear LLC (PSEG or the licensee) submitted an amendment request for Salem Nuclear Generating Station (Salem), Unit Nos. 1 and 2. The proposed amendment would relocate Technical Specification (TS) requirements pertaining to communications during refueling operations (TS 3/4.9.5), manipulator crane operability (TS 3/4.9.6), and crane travel (TS 3/4.9.7) to the Technical Requirements Manual (TRM).

The Nuclear Regulatory Commission (NRC or the Commission) staff has reviewed the information the licensee provided that supports the proposed amendment and would like to discuss the following issues to clarify the submittal.

- 1) PSEG's letter dated April 9, 2009, states that the proposed change would relocate the subject TS requirements to the Salem TRM. The letter also states that future changes to the TRM would be controlled under 10 CFR 50.59. It is the NRC staff's understanding that the Salem TRM does not yet exist. As such, there is no discussion of the TRM in the Salem Updated Final Safety Analysis Report (UFSAR). The NRC staff needs additional information regarding the TRM in order to provide assurance that future changes to the relocated material will be adequately controlled under the provisions of 10 CFR 50.59.

For example, Nuclear Energy Institute (NEI) guidance document NEI 98-03, Revision 1, "Guidelines for Updating Final Safety Analysis Reports" (ADAMS Accession No. ML003779028) lists the following methods of controlling the TRM on page 7 of Appendix A:

- The TRM or other licensee controlled document is explicitly "incorporated by reference" into the UFSAR. Under this approach, the referenced document is subject to the change control requirements of 10 CFR 50.59 and the update/reporting requirements of 10 CFR 50.71(e), e.g., periodic submittal of change pages, etc.
- The TRM or other licensee controlled document is treated in a manner consistent with procedures fully or partially described in the UFSAR. Under this approach, the referenced document is maintained on-site in accordance with licensee administrative processes, and changes are evaluated using 10 CFR 50.59.

Regulatory Guide 1.181, "Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)" dated September 1999, states that Revision 1 of NEI 98-03 provides methods that are acceptable to the NRC staff for complying with the provisions of 10 CFR 50.71(e).

Please provide information regarding the planned change control mechanisms for the Salem TRM including a discussion of UFSAR changes planned as part of the implementation of the amendment. Note, similar information was provided regarding the Hope Creek TRM in PSEG's letter dated August 23, 2007 (ADAMS Accession No. ML072480611). The associated information regarding the TRM was later incorporated into Section 13.5.4 of the Hope Creek UFSAR.