

December 20, 2010

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. ME3574 AND ME3575)

The attached draft request for information (RAI) was transmitted on December 20, 2010, 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 March 23, 2010, as supplemented on November 19, 2010. The proposed amendment would modify the Technical Specifications by relocating specific surveillance frequencies to a licensee-controlled document. The proposed amendment is based on Nuclear Regulatory Commission (NRC)-approved Technical Specification Task Force (TSTF) Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF [Risk-Informed TSTF] Initiative 5b."

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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OFFICE	LPL1-2/PM
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DATE	12/20/2010

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DRAFT REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED LICENSE AMENDMENT
RISK-INFORMED RELOCATION OF SURVEILLANCE FREQUENCY REQUIREMENTS
SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

By letter dated March 23, 2010, as supplemented by letter dated November 19, 2010, (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML100910154 and ML103230482, respectively), 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 modify the Technical Specifications by relocating specific surveillance frequencies to a licensee-controlled document. The proposed amendment is based on Nuclear Regulatory Commission (NRC)-approved Technical Specification Task Force (TSTF) Traveler TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control - RITSTF [Risk-Informed TSTF] Initiative 5b."

The NRC 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.

In Table 2-1 of Attachment 2 of the March 23, 2010, submittal, the licensee has provided a tabulation of the findings from the 2008 peer review conducted to assess the Salem internal events PRA model against the requirements of capability category II of the internal events PRA standard. Several findings were characterized by the peer reviewer as documentation deficiencies (rather than an actual technical issue) while in other cases it appears that the licensee has determined the finding to be a documentation deficiency.

In its initial review, the NRC staff requested additional information on several of these peer review findings which were characterized as related to documentation, and not to the technical adequacy of the model. This request for additional information (RAI) was satisfied by the November 19, 2010, response by PSEG.

In developing its safety evaluation of this amendment request, the NRC staff has determined that additional peer review findings, characterized by the licensee as related to documentation, need further justification for the staff to find the internal events PRA model technically adequate to support the application. The licensee is therefore requested to respond to the following additional RAI:

1. Finding IE-A5-01: Describe how events occurring during plant shutdown or which resulted in a controlled plant shutdown are addressed in the development of initiating events, and confirm that the supporting requirement of the standard is met except for adequacy of the documentation.
2. Finding AS-A7-01: Describe how subsuming of non-minimal sequences in the single-top fault tree model has been determined not to result in a loss of risk insights or masking of importance of non-standard configurations, and confirm that the supporting requirement of the standard is met except for adequacy of the documentation.

3. Finding AS-A7-01: Describe how the potential for flooding damage prior to isolation of the interfacing system flowpath has been evaluated and determined to not affect the capability to achieve safe shutdown, and confirm that the supporting requirement of the standard is met except for adequacy of the documentation.
4. Finding AS-A8-01: The peer review team identified three technical issues: (1) recovery of mitigating systems following restoration of offsite power; (2) double crediting of offsite power recovery; and (3) mission times of the mitigating systems. Only the third item appears to be addressed directly by the entry in Table 2-1 as a documentation issue. Address the full scope of this finding, and confirm that the supporting requirement of the standard is met except for adequacy of the documentation.
5. Findings SY-A6-01, SY-A8-01, SY-A10-01, SY-A12-01, and SY-A13-01: Collectively these findings relate to system and data boundaries and modeled failure modes. Failure modes for some components are specifically identified as excluded or otherwise missing from the model. Describe how these issues were determined not to represent technical deficiencies and confirm that the supporting requirements of the standard are met except for adequacy of the documentation.