

March 29, 2012

MEMORANDUM TO: Meena 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: HOPE CREEK GENERATING STATION AND SALEM NUCLEAR
GENERATING STATION, UNIT NOS. 1 AND 2, DRAFT REQUEST
FOR ADDITIONAL INFORMATION (TAC NOS. ME7651, ME7652 AND
ME7653)

The attached draft request for information (RAI) was transmitted on March 29, 2012, to Mr. Paul Duke of PSEG Nuclear LLC (PSEG or the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's submittal dated November 30, 2011, for Hope Creek Generating Station and Salem Nuclear Generating Station, Unit Nos. 1 and 2. PSEG's submittal requested Nuclear Regulatory Commission (NRC) staff approval of an exemption from certain requirements of Title 10 of the *Code of Federal Regulations*, Part 26, "Fitness for Duty Programs," Subpart I, "Managing Fatigue," related to meeting work hour controls during declarations of severe weather conditions involving tropical storm or hurricane force winds or severe winter precipitation.

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

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

Attachment: Draft RAI

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

Attachment: Draft RAI

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ACCESSION NO.: ML120900237

OFFICE	PDI-2/PM
NAME	REnnis
DATE	3/29/12

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

HOPE CREEK GENERATING STATION

AND

SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2

EXEMPTION FROM CERTAIN REQUIREMENTS OF THE FITNESS FOR DUTY RULE

DOCKET NOS. 50-354, 50-272, AND 50-311

By letter dated November 30, 2011 (ADAMS Accession No. ML113350245), PSEG Nuclear LLC (PSEG, the licensee) submitted an exemption request for Hope Creek Generating Station (HCGS) and Salem Nuclear Generating Station, Unit Nos. 1 and 2 (Salem). Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 26.9, PSEG requested an exemption from certain requirements of 10 CFR Part 26, "Fitness for Duty Programs," Subpart I, "Managing Fatigue," related to meeting work hour controls during declarations of severe weather conditions involving tropical storm or hurricane force winds or severe winter precipitation.

The NRC staff has reviewed the information the licensee provided and would like to discuss the following issues to clarify your submittal.

1. Consistent with the lessons-learned from Hurricane Andrew (Reference 1), as much as possible, site preparation for a hurricane should occur prior to the need to sequester individuals. What is the time period that is allocated for personnel to prepare the site for the various severe weather scenarios prior to the arrival of hurricane force winds on-site, excessive snowfall, excessive temperatures or flooding in the vicinity of the plant? Please be as precise as possible with respect to the number of days or hours prior to the arrival of severe conditions.
2. The exemption request discusses entry conditions that would be used prior to entering the Emergency Response Plan. What are the technical considerations that the Senior Vice President for Nuclear Operations or designee will use to determine entry into the exemption?
3. Many factors contribute to fatigue; one of these factors is inconsistent start times. In order to manage fatigue during sequestering, will shift start times be pre-planned and consistent? Please explain the rationale for organizing current shift start times during sequestering.
4. How has the occurrence of previous severe weather at HCGS and Salem informed the development of the sequestering plans and timing and duration expected for the exempted period?
5. Have all the procedures that will need to be updated or developed been identified?

Attachment

6. On page 8 of the provided document OP-AA-108-111-1001, it states that Phase II will be implemented when any potentially damaging severe weather is predicted for the immediate area within 48 hours. Is there a compressive list of the weather conditions to which this statement refers? The NRC staff has observed the definition of Severe Weather on page 2 of this same document and it does not provide a finite list or the cut off for what is considered severe weather.
7. Please provide additional information describing the specific criteria regarding severe winter precipitation and the determination of blizzard conditions as it relates to this exemption request.

References

1. NRC Information Notice 93-53, "Effect of Hurricane Andrew on Turkey Point Nuclear Generating and Lessons Learned," dated July 20, 1993 (ADAMS Accession No. ML031070364).