

REVISED

**DRAFT REQUEST FOR ADDITIONAL INFORMATION RELATED TO REQUEST FOR
EXEMPTION FROM CERTAIN REQUIREMENTS OF THE FITNESS FOR DUTY RULE
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 November 30, 2011 (ADAMS Accession No. ML113350245), PSEG Nuclear LLC (PSEG, the licensee) submitted an exemption request for Hope Creek Generating Station (Hope Creek) and Salem Nuclear Generating Station, Units 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. PSEG provided a supplement on June 4, 2012, (ADAMS Accession No. ML12157A061) in response to an NRC staff request for additional information. The NRC staff has determined that additional information is needed to complete the review, as described below.

RAI-08: Attachment 1 of the submittal dated November 30, 2011, describes the geographical location of Hope Creek and Salem in terms of the potential impact that severe weather can have on the site. Please describe the local history and policies for cleaning the streets/roads accessing the site.

RAI-09: Attachment 1 of the submittal dated November 30, 2011, states the following:

The proposed exemption does not include discretionary maintenance. Work necessary to maintain the plant in a safe and secure condition or to protect equipment required for safety or power generation from potential storm damage may be performed during periods when the proposed exemption would apply.

Because of the importance and high priority assigned to restoration of electrical power to the area affected by the storm, PSEG does not consider work required to allow the plant to restart following a storm to be discretionary.

Please state whether restarting the units to restore power is considered discretionary.

RAI-10: Attachment 1 of the PSEG letter dated June 4, 2012, provides the response to NRC

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request for additional information RAI-07 (ADAMS Accession No. ML12157A061). The response lists the proposed entry conditions for the exemption during severe winter conditions. The forecast for unsafe travel gives an example of wind conditions but not an example for unsafe road conditions due to severe winter weather such as ice accumulations or snow accumulations. Please provide examples for unsafe road conditions.

RAI-11: Does PSEG specifically communicate with the local government regarding how unsafe travel conditions are determined, or what various levels of travel restrictions are issued? If so, please state the local government entity (e.g. city, county, or state Department of Transportation). How much lead time would the local government give site personnel when preparing to declare travel restrictions?

RAI-12: Attachment 1 of the submittal dated November 30, 2011, describes the exit condition for the requested exemption as being when enough personnel are available to support meeting full compliance with the work hour rule. Attachment 1 of the PSEG letter dated June 4, 2012, provides responses to the requests for additional information RAI-02 and RAI-07. The responses provided criteria for entry into the requested exemption. Is there a documented method used by the deciding official that describes the criteria for determining when adequate personnel are available to support exiting the exemption period? An example would be the use of staffing rosters that are tied to a departmental or organizational function, in order to monitor compliance with Part 26 Subpart I requirements. If so, please provide the same level of detail as was provided for the entry criteria.

The response to RAI-07 provided in Attachment 1 of your supplement dated June 4, 2012, states that one of the entry conditions for the exemption is unsafe travel (i.e. sustained wind conditions over 40 miles per hour).

RAI-13.1: Is the sustained wind speed condition determined by onsite meteorological personnel or is it determined from an official forecast from the national weather service?

RAI-13.2: Is there a specific definition used on-site which specifies the minimum time period necessary to qualify wind conditions as "sustained winds?"

RAI-13.3: How long must the wind speed exceed 40 miles per hour for the deciding official to determine that entry into the exemption period is necessary?

RAI-13.4: Why is the entry condition for hazardous travel conditions due to sustained winds necessary? What circumstances are anticipated that would result in this entry condition being present when the other entry conditions for severe weather are not?