

PSEGSPeRAIPEm Resource

From: Chowdhury, Prosanta
Sent: Thursday, September 20, 2012 10:07 AM
To: 'PSEGRAIResponses@pseg.com'
Cc: PSEGSPeRAIPEm Resource; 'James.Mallon@pseg.com'; 'David.Robillard@pseg.com'; Segala, John; Roach, Kevin; Clark, Phyllis; McLellan, Judith; Musico, Bruce; Barss, Dan; Williams, Kevin
Subject: PSEG Site ESPA FINAL RAI 66 (eRAI 6719) SRP-14.03.10 (NSIR-LIB-EP)
Attachments: PSEG Site ESPA Final RAI 66 (eRAI 6719).pdf

Please find attached RAI 66 (eRAI 6719) for the PSEG Site ESP Application. A draft of the RAI was provided to you on September 4, 2012. You informed via email on September 18, 2012, that you would not need a clarification call involving this specific RAI, and therefore, we are issuing this RAI as final with no changes made to it.

The schedule we have established for review of your application assumes technically correct and complete responses within 30 calendar days of receipt of RAIs. For any RAIs that cannot be responded to within 30 calendar days, it is expected that a date for receipt of this information will be provided to the staff within the 30-calendar day period so that the staff can assess how this information will impact the published schedule.

If you have any questions, please contact me.

Prosanta Chowdhury
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301-415-1647

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Request for Additional Information 66

Application Revision 1

FINAL

9/20/2012

PSEG Site ESP
PSEG Power LLC, PSEG Nuclear LLC
Docket No. 52-043

Review Section: 14.03.10 - Emergency Planning - Inspections, Tests, Analyses, and Acceptance Criteria
Application Section: Part 5, Attachment 10

QUESTIONS

14.03.10-1

Supplemental RAI (for sub-question i, refer to RAI 22, Question 13.03-11 [RAI B-5]):

Revision 1 of the early site permit (ESP) application proposes emergency planning inspections, tests, analyses, and acceptance criteria (EP ITAAC) in Attachment 10 to Part 5, "Emergency Plan." The staff reviewed these EP ITAAC, and identified necessary revisions. Please make the following revisions, or explain why they are not required:

- a. In ITAAC 4.0, Public Education and Information, delete the last sentence in Inspections, Tests, Analyses (ITA) 4.1, which reads "The space provides adequate equipment to support ENC/JIC operation." The staff believes that this sentence would be more appropriate in the Acceptance Criteria (AC) column, and is unnecessary here

In addition, in AC 4.1, revise item c. to replace "Limited number of news media" with a specific number, or "The news media." In Table 14.3.10-1 of NUREG-0800 Section 14.3.10, generic EP ITAAC acceptance criterion 7.1 includes the following, bracketed statement: "[The COL applicant will specify the number of news media to be accommodated.]" This criterion is equally applicable to an ESP application that proposes a complete and integrated emergency plan; as does the PSEG Site ESP application. The staff notes that Section 9.6 of the Emergency Plan (Part 5) states in part that the ENC/JIC "has sufficient facilities to support use by 100 or more media personnel."

- b. In ITAAC 6.0, Accident Assessment, delete the word "expeditiously" from AC 6.1.g. The AC includes a time of 15 minutes to notify authorities.
- c. In ITAAC 6.0, revise AC 6.3 to identify specific capabilities that will demonstrate completion of the AC criteria (see NUREG-0800 Table 14.3.10-1, AC 9.3 bracketed statement). For example, similar to the preceding AC 6.2, revise AC 6.3 to replace "that the means exist to" with "that EIPs provide direction to". The reference to EIPs provides objective criteria that address specific capabilities.
- d. In ITAAC 6.0, revise AC 6.5 to identify specific capabilities to determine release rate and projected dose rates when instruments are off-scale or inoperable (e.g., in accordance with EIPs), such that objective evaluation criteria are available to judge successful ITAAC completion.
- e. In ITAAC 6.0, revise EP Program Element 6.6 to replace "environmental monitoring" with "field monitoring". This will properly reflect NUREG-0654 evaluation criteria [I.7], and provide consistency with the terminology used in the related Inspections, Tests, Analyses (ITA) and AC columns. In addition, in AC 6.6, revise the sentence to end as

follows: ". . . within the plume exposure EPZ during a radioactive release scenario." This will clarify the context of the activity, and be consistent with other such references in the EP ITAAC table.

- f. In ITAAC 6.0, revise AC 6.8 to identify specific capabilities (e.g., reference to EIPs), and add the words "during a radioactive release scenario."
- g. Revise ITAAC AC 8.1.1.E.2.b to clarify what "pc" means (e.g., replace with "personal computer" - if appropriate). In contrast to the use of "pc" in the ITAAC, ESP application Part 2, Table 1.1-1 defines "pc" as "pre-consolidation stress."
- h. In ITAAC AC 8.1.3, replace "of rated power" with "of rated thermal power". This will reflect 10 CFR 50.54(gg)(1), and eliminate possible confusion regarding the specific power measurement unit in the acceptance criterion.
- i. Delete ITAAC 10.0 in its entirety. Previously, in RAI 22, Question 13.03-11 [RAI B-5], the staff asked PSEG to add an EP ITAAC associated with revising or updating letters of agreement before fuel load, and ITAAC 10.0 was added to ESP application Revision 1. Upon further consideration of the timing associated with the review of these letters of agreement, the staff determined that the updated letters of agreement (or memoranda of understanding) must be available for review at the combined license (COL) application stage, and not after issuance of the COL. Importantly, the updated letters/memoranda are required at the COL application stage for review by the Federal Emergency Management Agency (FEMA), in support of their reasonable assurance finding associated with offsite emergency preparedness.