

PSEG Nuclear LLC
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AUG 22 2013

Order EA-12-049

LR-N13-0173

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Hope Creek Generating Station
Renewed Facility Operating License No. NPF-57
NRC Docket No. 50-354

Subject: PSEG Nuclear LLC's First Six-Month Status Report for the Hope Creek Generating Station in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012
3. Nuclear Energy Institute (NEI) Report NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August, 2012
4. PSEG Letter LR-N12-0329, "PSEG Nuclear LLC's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated October 31, 2012

5. PSEG Letter LR-N13-0031, "PSEG Nuclear LLC's Overall Integrated Plan for the Hope Creek Generating Station in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013
6. NRC Order EA-12-050, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents," dated March 12, 2012
7. NRC Order EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Effective Immediately)," dated June 6, 2013

On March 12, 2012, the Nuclear Regulatory Commission (NRC) issued an Order (Reference 1) to PSEG Nuclear LLC (PSEG). Reference 1 was immediately effective and directs PSEG to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1. The purpose of this letter is to provide the first six-month status report which delineates progress made in implementing the requirements of the Order, pursuant to Condition IV.C.2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an Overall Integrated Plan pursuant to Section IV.C. Reference 2 endorses, with clarifications, industry guidance document NEI 12-06, Revision 0 (Reference 3) as an acceptable means of meeting the requirements of Reference 1. Reference 4 provided the Hope Creek Generating Station (HCGS) initial status report regarding diverse and flexible coping strategies (FLEX). Reference 5 provided the HCGS FLEX Overall Integrated Plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the Overall Integrated Plan. NEI 12-06 (Reference 3) provides direction regarding the content of the status reports; i.e., the reports should include an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if applicable.

Enclosure 1 provides the first six-month status report for HCGS, and reflects the milestone accomplishments, status, and schedule for FLEX implementation as of July 31, 2013. There are no changes in compliance method identified in Enclosure 1. However, the strategies described in the HCGS Overall Integrated Plan (Reference 5) depend, in part, upon hardened containment venting capabilities that assume implementation of NRC Order EA-12-050 (Reference 6) coincident with implementation of the FLEX Overall Integrated Plan. NRC Order EA-13-109 (Reference 7) rescinds Reference 6 and imposes additional requirements for HCGS hardened containment venting capabilities. PSEG is evaluating the impact of Reference 7 on implementation of the HCGS FLEX strategies. If PSEG determines that relief from the requirements of

Reference 1 is necessitated by the change in containment venting requirements, then PSEG will request such relief via separate correspondence.

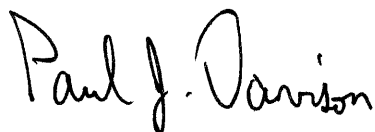
There are no regulatory commitments contained in this letter.

If you have any questions or require additional information, please do not hesitate to contact Mrs. Emily Bauer at 856-339-1023.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 8/22/2013
(Date)

Sincerely,



Paul J. Davison
Site Vice President
Hope Creek Generating Station

Enclosure 1 – Hope Creek Generating Station First Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: Mr. E. Leeds, Director of Office of Nuclear Reactor Regulation
Mr. W. Dean, Administrator, Region I, NRC
Mr. J. Hughey, Project Manager, NRC
NRC Senior Resident Inspector, Hope Creek
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC
Mr. P. Mulligan, Manager IV, NJBNE
Hope Creek Commitment Tracking Coordinator
PSEG Corporate Commitment Coordinator

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ENCLOSURE 1

LR-N13-0173

**Hope Creek Generating Station First Six-Month Status Report for the
Implementation of Order EA-12-049, Order Modifying Licenses with Regard to
Requirements for Mitigation Strategies for Beyond-Design-Basis External Events**

**Hope Creek Generating Station
PSEG Nuclear LLC**

Hope Creek Generating Station First Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

1 Introduction

PSEG Nuclear LLC (PSEG) developed an Overall Integrated Plan (OIP) (Reference 1) for the Hope Creek Generating Station (HCGS), documenting the diverse and flexible coping strategies (FLEX) in response to NRC Order EA-12-049 (Reference 2). Provided herein is the HCGS first six-month status report associated with the FLEX OIP (Reference 1), for the reporting period ending July 31, 2013. This update follows the guidance in Section 13.2 of Nuclear Energy Institute (NEI) report NEI 12-06 (Reference 3), which states that the six-month status reports should include an update of milestone accomplishments since the previous report, changes to the compliance method, schedule, and the need for relief and the basis for relief, if applicable. Sections 2 and 3 of this status report include milestone accomplishments and schedule status, respectively. There are no changes to compliance method identified in Section 4 of this report. Section 5 addresses the potential need for relief associated with the severe accident-capable hardened containment venting capabilities required by NRC Order EA-13-109 (Reference 4).

2 Milestone Accomplishments

The following milestone(s) have been completed since the development of the FLEX OIP (Reference 1), and are current as of July 31, 2013.

- Submit Integrated Plan: PSEG submitted the HCGS OIP for FLEX (Reference 1).
- Develop FLEX Strategies: PSEG has developed HCGS FLEX strategies as described in Reference 1 and has identified design, analysis, procurement, and programmatic actions necessary to achieve compliance with Order EA-12-049 (Reference 2). Changes to the FLEX strategies may be identified as PSEG proceeds with implementation of these actions, in which case they will be described in future six-month updates or via more timely correspondence, as appropriate.

3 Milestone Schedule Status

The following table provides an update to Attachment 2 of the FLEX OIP (Reference 1). The table provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed. The revised milestone target completion dates do not impact the Order EA-12-049 (Reference 2) implementation date.

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Submit Overall Integrated Plan	Feb 2013	Complete	
Six-Month Status Update	Aug 2013	Complete	
	Feb 2014	Not Started	
	Aug 2014	Not Started	
	Feb 2015	Not Started	
	Aug 2015	Not Started	
Develop Strategies	May 2013	Complete	
Modifications			
Develop Modifications	Apr 2014	Not Started	
Implement Modifications	Apr 2015	Not Started	May 2015
Develop Flex Support Guidelines (FSGs)	Dec 2013	Not Started	Mar 2014
Validation Walk-throughs or Demonstrations of FLEX Strategies and Procedures (Note 1)	May 2015	Not Started	
Perform Staffing Analysis (Note 2)	Dec 2013	Not Started	Dec 2014
Develop Training Plan	Jun 2014	Not Started	
Implement Training	Dec 2014	Not Started	
Develop Strategies/Contract with Regional Response Center (RRC)	Oct 2013	Started	Nov 2014
Procure Equipment	Dec 2013	Started	Nov 2014
Create Maintenance Procedures	Jun 2014	Started	May 2015

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Emergency Preparedness (EP) Communications Improvements (Note 3)	Jun 2014	Started	
HC Implementation Outage	Apr 2015	Not Started	May 2015
Report to NRC When Full Compliance is Achieved (Note 4)	Aug 2015	Not Started	

Section 3 Table Notes

- 1) The validation walk-through milestone is not specifically identified in the FLEX OIP (Reference 1) milestone schedule, but is added here as a follow-up to the milestone for development of FSGs.
- 2) The staffing analysis milestone's revised target completion date is aligned with the FLEX staffing study required by the 10 CFR 50.54(f) information request dated March 12, 2012 (Reference 6)
- 3) The EP communications improvement milestone is included here, consistent with Reference 7. The target completion date is associated with the Reference 7 milestone to complete installation, procedure revision, and training for satellite phone base units and antennae.
- 4) The milestone for reporting full compliance is not included in Attachment 2 to Reference 1, but is included here for completeness.

4 Changes to Compliance Method

There are no changes to the compliance method as documented in the HCGS FLEX OIP (Reference 1).

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

PSEG is evaluating the impact of NRC Order EA-13-109 (Reference 4) on the implementation of FLEX strategies as described in the HCGS FLEX OIP (Reference 1). The HCGS FLEX strategies depend, in part, on the ability to vent primary containment using a hardened containment vent system as prescribed by NRC Order EA-12-050 (Reference 5). Reference 4 rescinded Reference 5 and imposes additional requirements on containment venting capability in order to ensure reliable venting capability during severe accident conditions. Order EA-13-109 (Reference 4) also extends the implementation milestone for hardened containment venting via the wetwell by one refueling outage, commensurate with the increase in venting system requirements. HCGS is required to comply with the wetwell venting requirements of

Reference 4 prior to restart from Refueling Outage 20 (RFO20) in the Fall 2016, whereas FLEX implementation pursuant to Reference 2 is required prior to restart from RFO19 in Spring 2015.

PSEG is evaluating the need for relief from the requirements of Reference 2, in light of the revised containment venting requirements in Reference 4. If PSEG determines that relief from the requirements of Reference 2 is necessitated by the change in containment venting requirements, then PSEG will request such relief via separate correspondence.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

None.

7 Potential Draft Safety Evaluation Impacts

HCGS has not yet received a Draft Safety Evaluation for FLEX. There are no potential impacts to the Draft Safety Evaluation identified at this time.

8 References

1. PSEG letter LR-N13-0031, "PSEG Nuclear LLC's Overall Integrated Plan for the Hope Creek Generating Station in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)," dated February 27, 2013
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5. NRC Order EA-12-050, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents," dated March 12, 2012
6. US Nuclear Regulatory Commission (NRC) letter, "Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-Ichi Accident," dated March 12, 2012
7. PSEG letter LR-N13-0026, "PSEG Nuclear LLC's Response to NRC Follow-up Letter on Technical Issues for Resolution Regarding Licensee Communication Submittals Associated with Fukushima Near-Term Task Force Recommendation 9.3," dated February 21, 2013