

PSEG Nuclear LLC
P.O. Box 236, Hancocks Bridge, NJ 08038-0236



AUG 25 2013

Order EA-12-049

LR-N13-0175

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

Salem Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

Subject: PSEG Nuclear LLC's First Six-Month Status Report for the Salem 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-N13-0034, "PSEG Nuclear LLC's Overall Integrated Plan for the Salem 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 28, 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. In accordance with Reference 1, PSEG submitted an Overall Integrated Plan for the Salem Generating Station (SGS), Units 1 and 2, on February 28, 2013 (Reference 5). 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 Salem Generating Station (SGS) Units 1 and 2 initial status report regarding diverse and flexible coping strategies (FLEX). Reference 5 provided the SGS Units 1 and 2 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 SGS Units 1 and 2, and reflects status of FLEX implementation as of July 31, 2013. There are no changes in compliance method or requests for regulatory relief identified in Enclosure 1.

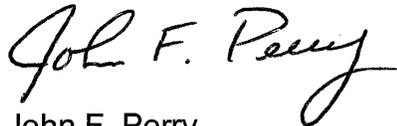
There are no regulatory commitments contained in this letter.

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 8/25/2013
(Date)

Sincerely,



John F. Perry
Site Vice President
Salem Generating Station

Enclosure 1: Salem Generating Station Units 1 and 2 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, Salem
Ms. Jessica A. Kratchman, NRR/JLD/PMB, NRC
Mr. P. Mulligan, Manager IV, NJBNE
Salem Commitment Tracking Coordinator
PSEG Corporate Commitment Coordinator

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ENCLOSURE 1

LR-N13-0175

**Salem Generating Station Units 1 and 2 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**

**Salem Generating Station Units 1 and 2
PSEG Nuclear LLC**

Salem Generating Station Units 1 and 2 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 Salem Generating Station (SGS) Units 1 and 2, documenting the diverse and flexible coping strategies (FLEX) in response to NRC Order EA-12-049 (Reference 2). Provided herein is the SGS Units 1 and 2 first six-month status report associated with the Reference 1 FLEX OIP, 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 (Section 4) and no issues requiring regulatory relief (Section 5) associated with this report.

2 Milestone Accomplishments

The following milestones 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 SGS Units 1 and 2 FLEX OIP to the NRC (Reference 1).
- **Develop FLEX Strategies:** PSEG has developed SGS Units 1 and 2 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 Overall Integrated Plan. 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 – SGS Unit 1	Dec 2013	Not Started	Mar 2014
Implement Modifications – SGS Unit 1	Oct 2014	Not Started	Nov 2014
Develop Modifications – SGS Unit 2	Dec 2013	Not Started	May 2014
Implement Modifications – SGS Unit 2	Oct 2015	Not Started	Nov 2015
Develop Flex Support Guidelines (FSGs)	Dec 2013	Not Started	Mar 2014
Validation Walk-throughs or Demonstrations of FLEX Strategies and Procedures (Note 1)	Nov 2014	Not Started	
Perform Staffing Analysis (Note 2)	Dec 2013	Not Started	Jun 2014
Develop Training Plan	Jun 2014	Not Started	
Implement Training			
Unit 1 Training	Dec 2014	Not Started	Nov 2014
Unit 2 Training	Dec 2014	Not Started	Nov 2015
Develop Strategies/Contract with Regional Response Center (RRC)	Oct 2013	Started	Nov 2014
Procure Equipment			
SGS Unit 1 Procurement	Dec 2013	Started	Oct 2014
SGS Unit 2 Procurement	Dec 2013	Started	Oct 2014

Milestone	Target Completion Date	Activity Status	Revised Target Completion Date
Create Maintenance Procedures	May 2014	Started	Nov 2014
Emergency Preparedness (EP) Communications Improvements (Note 3)	Jun 2014	Started	
SGS Unit 1 Implementation Outage	Oct 2014	Not Started	Nov 2014
SGS Unit 1 Report to NRC When Full Compliance is Achieved (Note 4)	Feb 2015	Not Started	
SGS Unit 2 Implementation Outage	Oct 2015	Not Started	Nov 2015
SGS Unit 2 Report to NRC When Full Compliance is Achieved (Note 4)	Feb 2016	Not Started	

Section 3 Table Notes

- 1) The validation walk-through milestone is not specifically identified in the Reference 1 FLEX OIP 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 4).
- 3) The EP communications improvement milestone is included here, consistent with Reference 5. The target completion date is associated with the Reference 5 milestone to complete installation, procedure revision, and training for satellite phone base units and antennae.
- 4) The milestone for reporting full compliance to the NRC 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 SGS Units 1 and 2 FLEX OIP (Reference 1).

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

PSEG expects to comply with the Order EA-12-049 (Reference 2) implementation date for SGS Units 1 and 2, and no relief or relaxation is required at this time.

6 Open Items from Overall Integrated Plan and Draft Safety Evaluation

None.

7 Potential Draft Safety Evaluation Impacts

SGS Units 1 and 2 have 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-N13-0034, "PSEG Nuclear LLC's Overall Integrated Plan for the Salem 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 28, 2013
2. 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
3. Nuclear Energy Institute (NEI) Report NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August, 2012
4. 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.
5. 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