



November 13, 2013
ND-2013-0036

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

Subject: **PSEG POWER, LLC**
Docket No. 52-043
Documents in Support of Application
Early Site Permit for the PSEG Site
Comments on Advanced Safety Evaluation for Chapter 13, Section
13.6, "Physical Security"

Reference: 1) Letter from P. Chowdhury, USNRC, to J. Mallon, PSEG Power, LLC,
PSEG EARLY SITE PERMIT APPLICATION – ADVANCED SAFETY
EVALUATION WITH NO OPEN ITEMS FOR CHAPTER 13,
SECTION 13.6, "PHYSICAL SECURITY", dated October 31, 2013

In Reference 1, USNRC transmitted the Advanced Safety Evaluation with No Open Items for Chapter 13, Section 13.6, "Physical Security", associated with PSEG's Early Site Permit (ESP) application, for review to confirm that the Advanced Safety Evaluation does not include any proprietary information that PSEG would seek to withhold under 10 CFR 2.390, or contain any factual errors.

PSEG has completed the review of the above referenced safety evaluation and has determined that the safety evaluation does not include any proprietary information that PSEG would seek to withhold under 10 CFR 2.390.

During PSEG's review of the advanced safety evaluation for Section 13.6, PSEG compiled a list of comments that could improve the accuracy and clarity of the safety evaluation. These comments are included in Enclosure 1 to this letter.

If additional information is needed, please contact David Robillard, PSEG Nuclear Development Licensing Engineer, at (856) 339-7914.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of November, 2013.

Respectfully,



James Mallon
Early Site Permit Manager
Nuclear Development
PSEG Power, LLC

Enclosure 1: List of Comments on Advanced Safety Evaluation for Chapter 13, Section 13.6, "Physical Security"

cc: USNRC Project Manager, Division of New Reactor Licensing, PSEG Site
(w/enclosure)
USNRC Environmental Project Manager, Division of New Reactor Licensing
(w/enclosure)
USNRC Region I, Regional Administrator (w/o enclosure)
~~ORNL (w/enclosure)~~ *220 11/14/13*

PSEG Letter ND-2013-0036, dated November 13, 2013

Enclosure 1

**List of Comments on Advanced Safety Evaluation for
Chapter 13, Section 13.6, "Physical Security"**

3 Pages

Draft SER Review Comments

SER Chapter/Section: 13.6 Title: Physical Security		
Comment No.	Page	Comment
1	13-1	Chapter 13 Heading: Change "PSEG EARLY SITE PERMIT" to "CONDUCT OF OPERATIONS"
2	13-1	13.6.1, 2nd para., 3rd sentence: Delete "SSAR" in front of "Figure 2.1-3." This figure is in the Environmental Report.
3	13-1	Section 13.6.2, 2nd para., 1st sentence: For the longitude, add the degree symbol after 75 and the second symbol after 24.3316 and for latitude, add the degree symbol after 39 and the second symbol after 23.7436.
4	13-2	13.6.3, 4 th para., 1st bullet: Change "...adequate security plans and measurements can be developed." to "...adequate security plans and measures can be developed."
5	13-2	Section 13.6.3, 5th para., Item 2: Change "... Early Site Permit," Revision 1; October 2010..." to "... Early Site Permit," Revision 0; March 2007 ..." The PSEG Site ESP application was submitted to the NRC on May 25, 2010. Revision 1 of NUREG-0800, Section 13.6.3 is therefore not applicable to the PSEG Site ESP application. NUREG-0800, Section 13.6.3, Revision 0, March 2007 is the revision that is applicable.
6	13-3	Section 13.6.4.1, 1st para.,: Change "In SSAR Section 13.6, the applicant stated: "The PSEG site is sufficiently large to provide adequate distances between structures and the probable location of security boundaries. When a reactor technology selection is made and a combined license application is prepared, the specific design features to assure site security in compliance with 10 CFR 73.55, will be defined." to "In SSAR Section 13.6, the applicant stated: "The PSEG site is sufficiently large to provide adequate distances between structures and the probable location of security boundaries" and then goes on to state: "When a reactor technology selection is made and a combined license application is prepared, the specific design features to assure site security in compliance with 10 CFR 73.55, will be defined." The statements that are quoted in the draft SER are in different paragraphs in the ESPA.

**Draft SER Review Comments
(cont.)**

Comment No.	Page	Comment
7	13-3	Section 13.6.4.1, 2nd para., 1st sentence: Delete "safety-related" in front of "water structures."
8	13-3	Section 13.6.4.1, 2nd para., 2nd sentence: For the longitude, add the degree symbol after 75 and the second symbol after 24.3316 and for latitude add, the degree symbol after 39 and the second symbol after 23.7436.
9	13-4	Section 13.6.4.2, 1st para., 3rd sentence: For the longitude, add the degree symbol after 75 and the second symbol after 24.3316 and for latitude, add the degree symbol after 39 and the second symbol after 23.7436.
10	13-4	Section 13.6.4.2, 1st para., last sentence: Delete "safety-related" in front of "water sources."
11	13-5	Section 13.6.4.2, 5th para., 1st bullet: Change "... Question 03.06.03-1 ..." to "... Question 13.06.03-1..."
12	13-5	Section 13.6.4.3, 1st para., 2nd sentence: Change "... railroad line is 13.12 km ..." to "... railroad line is 13.2 km ..."
13	13-6	Section 13.6.4.3, 3rd para., 2nd sentence: Change "...and is located 23.2 km ..." to "... and is located 23.3 km ..."
14	13-6	Section 13.6.4.3, 3rd para., 3rd sentence: Change "...Air Force Base, located 38.08 km ..." to "... Air Force Base, located 38.3 km ..."
15	13-6	Section 13.6.4.3, 4th para., 3rd sentence: Change "...extends from the PSEG Site 7.52 km ..." to "... extends from the PSEG Site 7.6 km ..."
16	13-7	Section 13.6.4.3, 9th para., 3rd sentence: Change "The only highway near the proposed PSEG Site is Delaware Route 9..." to "The only highway within 5 miles of the PSEG Site is Delaware Route 9..." This change is to make the SER consistent with SSAR Section 2.2.2.5.

**Draft SER Review Comments
(cont.)**

Comment No.	Page	Comment
17	13-7	Section 13.6.4.3, 11th para., 1st sentence: Change "... finds the applicant's April 15, 2011 ..." to "... finds the applicant's April 5, 2011 ..."
18	13-8	Section 13.6.4.4, 2nd para., 2nd sentence: Change "... U.S. Route 13, and is located 9.44 km ..." to "... U.S. Route 13, and is located 9.5 km ..."