



November 13, 2013  
ND-2013-0037

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 15, Section**  
**15.0.3, "Radiological Consequences of Design Basis Accidents"**

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 15, SECTION 15.0.3, "RADIOLOGICAL CONSEQUENCES OF DESIGN BASIS ACCIDENTS", dated October 31, 2013

In Reference 1, USNRC transmitted the Advanced Safety Evaluation with No Open Items for Chapter 15, Section 15.0.3, "Radiological Consequences of Design Basis Accidents", 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 15.0.3, 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.

D079  
MRO

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 15, Section 15.0.3, "Radiological Consequences of Design Basis Accidents"

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)~~ *2012 11/14/13*

**PSEG Letter ND-2013-0037, dated November 13, 2013**

**Enclosure 1**

**List of Comments on Advanced Safety Evaluation for**

**Chapter 15, Section 15.0.3,**

**“Radiological Consequences of Design Basis Accidents”**

**2 Pages**

## Draft SER Review Comments

| <b>SER Chapter/Section: 15.0.3</b><br><b>Title: Radiological Consequences of Design Basis Accidents</b> |      |   |
|---|------|---|
| Comment No.   | Page | Comment   |
| 1   | iii  | List of Tables on page iii does not include Table 15.0.3.4.3-2, and there is no page number for Table 15.0.3.4.3-4.   |
| 2   | 15-1 | Chapter 15 Heading:<br>Change "PSEG EARLY SITE PERMIT" to "TRANSIENT AND ACCIDENT ANALYSIS"   |
| 3   | 15-1 | 15.0.3.1, 1st para., 2nd sentence:<br><br>Change ".. (3) Single Unit Advanced Passive 1000 and (4) Dual Unit U.S. Advanced Pressurized-Water Reactor .." to ".. (3) Dual Unit Advanced Passive 1000 and (4) Single Unit U.S. Advanced Pressurized-Water Reactor ..".<br><br>Also, there is a close quote missing at the end of the paragraph. |
| 4   | 15-1 | Section 15.0.3.2, 1st para., 3rd bullet:<br><br>There is a close parenthesis missing at the end of the sub-bullet.  |
| 5   | 15-2 | 15.0.3.2, 3rd para., 2nd sentence:<br><br>Table 15.4.2 only addresses APWR dose consequences. Equivalent tables for other technologies are: 15.4-4 (ABWR); 15.4-10 (AP1000); and 15.4-19 (EPR).   |
| 6   | 15-2 | Section 15.0.3.2, 3rd para., 3rd sentence:<br><br>Tables 15.3-1 thru 15.3-33 provide source terms only, not dose consequences.  |
| 7   | 15-4 | Section 15.0.3.4.1, 1st para., 1st sentence:<br><br>Change ".. the design certification document .." to ".. the design control document .."   |
| 8   | 15-4 | Section 15.0.3.4.1, 1st para., 2nd sentence:<br><br>Change "... categorized in Section 15.2 of this report." to "... categorized in Section 15.0.3.2 of this report."   |
| 9   | 15-5 | Table 15.0.3.4.2-1, 6th row, 2nd column:<br><br>Change "96-120" to "96-720"   |

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

| Comment No. | Page | Comment  |
|-------------|------|--|
| 10          | 15-7 | <p>Section 15.0.3.4.3, 5th para., 2nd, 3rd and 4th sentences:</p> <p>Change "... other than LOCA ..." to "... All Other Accidents ..." in all cases.</p> <p>The actual phrase that is used in the DCD, SSAR and referenced RAI is "All Other Accidents".</p>   |
| 11          | 15-9 | <p>Section 15.0.3.5, 2nd para., 1st sentence:</p> <p>Change "... boundary of the proposed ESP site, in conjunction with the PPE design parameter source terms in SSAR Table 2.0-1,..." to "... boundary of the proposed ESP site in SSAR Table 2.0-1, in conjunction with the PPE design parameter source terms,..."</p> <p>The first sentence implies the source terms are in Table 2.0-1, whereas Table 2.0-1 contains the site characteristics.</p> |