



November 13, 2013
ND-2013-0038

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 17, Section
17.5, "Quality Assurance Program Description"

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 17, SECTION 17.5, "QUALITY ASSURANCE PROGRAM DESCRIPTION", dated October 31, 2013

In Reference 1, USNRC transmitted the Advanced Safety Evaluation with No Open Items for Chapter 17, Section 17.5, "Quality Assurance Program Description", 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.

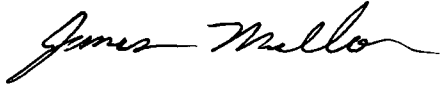
During PSEG's review of the advanced safety evaluation for Section 17.5, PSEG compiled a list of comments that could improve the accuracy and clarity of the safety evaluation. These comments are included in Enclosure 1 to this letter.

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 17, Section 17.5, "Quality Assurance Program Description"

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)~~ *DRIC 11/14/13*

PSEG Letter ND-2013-0038, dated November 13, 2013

Enclosure 1

List of Comments on Advanced Safety Evaluation for

Chapter 17, Section 17.5,

“Quality Assurance Program Description”

2 Pages

Draft SER Review Comments

SER Chapter/Section: 17 Title: Quality Assurance and Reliability Assurance		
Comment No.	Page	Comment
1	17-3	<p>Section 17.4.2, 3rd para., 1st sentence:</p> <p>Change ".. and Supplements 2S-1, 2S-2, 2S-3, and 2S-4, .." to ".. and Supplements 2S-1, 2S-3, and 2S-4, .."</p> <p>The QAPD does not commit to comply with Supplement 2S-2; 2S-2 is Qualification of NDE Personnel which is not applicable to an ESP-only QAP.</p>
2	17-6	<p>17.4.7, 2nd para., 2nd sentence:</p> <p>The sentence states: "Purchased items (e.g., components, spares, and replacement parts necessary for plant operation, refueling, maintenance, and modifications) and services are subject to quality and technical requirements at least equivalent to those specified for original equipment or by properly reviewed and approved revisions to ensure that the items are suitable for the intended service and are of acceptable quality to maintain safety."</p> <p>What is the regulatory basis for this statement? It is not in the QAPD, NQA-1 1994, NEI 06-14A, or 10 CFR 50 Appendix B.</p>
3	17-9	<p>Section 17.4.9, 3rd sentence:</p> <p>Change " ...in the combined operating license application ..." to "... in the combined license application ..."</p>
4	17-10	<p>Section 17.4.10, 5th para., 1st bullet:</p> <p>The bullet states: "As an alternative for sites that may not meet the requirement of ASME Standard NQA-1-1994, Supplement 10S-1, Section 3.1, for independent reporting, the QAPD proposes that the inspector must report to quality control management while performing the inspection. This alternative is consistent with staff guidance provided in SRP 17.5, Paragraph II.J.1."</p> <p>The bullet appears to be out of place as it does not provide clarification of the preceding paragraph. Additionally, PSEG has not taken this exception to NQA-1, 1994, Supplement 10S-1.</p>
5	17-12	<p>17.4.17, 2nd para.:</p> <p>The QAPD also commits to TG16-1998, "Software Configuration Management and Quality Assurance"; should this standard be included here?</p>
6	17-13	<p>Section 17.4.18, 1st para., 8th sentence:</p> <p>The sentence reads: "A responsible management documents and reviews audit results."</p> <p>This is an incomplete sentence; the intended meaning of the sentence is unclear.</p>

**Draft SER Review Comments
(cont)**

Comment No.	Page	Comment
7	17-13	<p>Section 17.4.20, 1st para., 2nd bullet:</p> <p>Change "RG 1.28, Revision 3, "Quality Assurance Program Requirements (Design and Construction)," August 1985. The QAPD utilizes the NRC endorsed NQA-1-1994 Standards. RG 1.29, "Seismic Design Classification," Revision 3, September 1978. The QAPD commits the applicant to comply with RG 1.29. Exceptions to this regulatory guide are addressed in SSAR Chapter 2, "Site Characteristics and Site Parameters."</p> <p>To "RG 1.28, Revision 3, "Quality Assurance Program Requirements (Design and Construction)," August 1985. The QAPD commits the applicant to comply with RG 1.28. Exceptions to this regulatory guide are addressed in SSAR Chapter 1, Table 1.9-1.</p> <p>New Bullet: RG 1.29, "Seismic Design Classification," Revision 4, March 2007. The QAPD commits the applicant to comply with RG 1.29. Exceptions to this regulatory guide are addressed in SSAR Chapter 2, "Site Characteristics and Site Parameters."</p>
8	17-13	<p>Section 17.4.20, 1st para., 3rd bullet:</p> <p>Change ".. as described in Sections 17.3.1 through 17.3.18 of .." to ".. as described in Sections 17.4.1 through 17.4.18 of .."</p>
9	17-13	<p>Section 17.4.20, 1st para., 4th bullet:</p> <p>Change ".. as described in Section 17.3.17 of .." to ".. as described in Section 17.4.17 of .."</p>