



ND-2014-0014
May 12, 2014

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

Subject: **Request for NRC to Suspend Review of the PSEG Early Site Permit Application (Docket 52-043) Analysis of Probable Maximum Surge Flooding**

- Reference:
- 1) PSEG Power, LLC Letter ND-2010-0073 to U.S. NRC, Application for Early Site Permit for the PSEG Site, dated May 25, 2010
 - 2) PSEG Power, LLC Letter No. ND-2014-0010 to U.S. NRC, Submittal of Revision 3 of the Early Site Permit Application for the PSEG Site, dated March 31, 2014
 - 3) PSEG Power, LLC Letter No. ND-2014-0013 to U.S. NRC, Request for Temporary Exemption Regarding the PSEG Early Site Permit Application (Docket 52-043) Analysis of Probable Maximum Surge Flooding, dated April 30, 2014

PSEG Power, LLC and PSEG Nuclear, LLC (PSEG) hereby request that the NRC suspend the review of the storm surge flood analysis for the PSEG Site Early Site Permit (ESP) application (ESPA) in Site Safety Analysis Report Subsection 2.4.5 until PSEG's exemption request submitted in Reference 3 has been resolved. This request applies only to the PSEG ESPA storm surge flood analysis, and does not apply to the Salem and Hope Creek response to the 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, submitted under PSEG letter numbers LR-N14-0042 and LR-N14-0041, respectively.

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PSEG submitted an application for an ESP for the PSEG Site on May 25, 2010 (Reference 1). On March 31, 2014, PSEG submitted Revision 3 to the ESPA (Reference 2). On April 30, 2014, PSEG submitted a request for a temporary exemption pursuant to 10 CFR 52.7 and 10 CFR 50.12, to the extent necessary to authorize the deferral of the performance of the final analysis for the maximum probable storm surge flooding hazard at the PSEG Site until such time that PSEG submits a Combined License (COL) application (Reference 3).

In support of the ESPA for the PSEG Site, PSEG performed an analysis of the Probable Maximum Surge and Seiche Flooding expected at the PSEG Site. In performing the analysis for the probable maximum surge and seiche flooding, PSEG followed the NRC guidance in effect at the time of the development of the ESPA. Subsequent to PSEG's ESPA submittal, new analysis methodologies became available, and the NRC guidance for performing storm surge analyses was revised. In response to NRC Request for Additional Information No. 67, Probable Maximum Surge and Seiche Flooding, Application Section: 2.4.5, issued on October 29, 2012, PSEG re-analyzed the storm surge flooding hazard using the Joint Probability Method (JPM) in accordance with the revised NRC guidance. PSEG submitted the revised storm surge analysis for the PSEG Site to the NRC on November 27, 2013.

The JPM with Optimal Sampling (JPM-OS) method described in the RAI No. 67 response represents the current state-of-the-art for flood analysis. This same methodology has been used by other operating reactor licensees to perform the flood reanalysis directed in the March 12, 2012 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".

On February 4 - 6, 2014, the staff conducted a regulatory audit involving SSAR Section 2.4, "Hydrology", of the ESP application. During the audit, the staff identified several areas where further information or documentation is needed for the staff to complete its review of this new, first application, of probabilistic storm surge. On March 5, 2014, NRC transmitted a letter to PSEG stating, in part:

The staff recognizes that the PSEG-proposed probabilistic approach may represent an improvement in the state-of-the-art and may be more widely applicable. However, approval of this approach will require more time and technical activity by both PSEG and the NRC staff. In light of the above, the staff is presently unable to issue a revised review schedule to complete its safety evaluation of the "Hydrology" portions of the PSEG Site ESP application.

In order to minimize the impact on NRC and PSEG resources involved in continuing the analysis and reviewing the probable maximum storm surge flooding hazard, PSEG requests that the NRC suspend the review of the PSEG ESPA storm surge flood analysis in Site Safety Analysis Report Subsection 2.4.5 until the PSEG request for temporary exemption submitted in Reference 3 has been resolved.

There are no commitments in this letter.

If there are any questions regarding this matter, please contact me at (856) 339-7908, or David Robillard, PSEG Nuclear Development Licensing Engineer at (856) 339-7914.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 12th day of May, 2014.

Sincerely,



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

cc: G. Holahan, Deputy Director, Office of New Reactors
F. Akstulewicz, Director, Division of New Reactor Licensing
M. Delligatti, Deputy Director, Division of New Reactor Licensing
S. Flanders, Director, Division of Site Safety and Environmental Analysis