



10 CFR 50.90

LR-N15-0050  
April 9, 2015

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

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

Hope Creek Generating Station  
Renewed Facility Operating License No. NPF-57  
NRC Docket No. 50-354

Subject: Response to Request for Additional Information Regarding License Amendment Request to Update Appendix B to Renewed Facility Operating Licenses (TAC Nos. MF5389, MF5390, and MF5391)

Reference: NRC Letter, "Hope Creek Generating Station and Salem Nuclear Generating Station, Unit Nos. 1 and 2, Request for Additional Information Regarding Request to Update Appendix B to Renewed Facility Operating License DPR-70, DPR-75 and NPF-57 (TAC NOs. MF5389, MF5390, and MF5391)," dated March 10, 2015

This letter responds to the referenced letter requesting PSEG Nuclear LLC (PSEG) provide additional information regarding the License Amendment Request (LAR) to Update Appendix B of the Renewed Facility Operating Licenses for Salem Nuclear Generating Station, Units 1 and 2, and Hope Creek Generating Station. Attachment 1 provides a detailed response to the request for additional information. Attachment 2 provides a copy of the PSEG letter to the National Marine Fisheries Service and Attachment 3 provides a revised mark-up of a proposed Technical Specification page for the Hope Creek Generating Station Renewed Facility Operating License.

There are no changes to the No Significant Hazards Consideration.

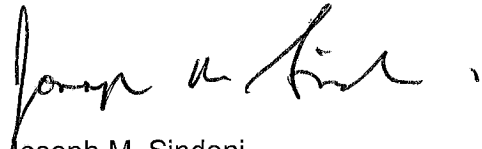
There are no regulatory commitments contained in this letter.

If you have any questions or require additional information, please contact Mr. Paul Duke at 856-339-1466.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 9, 2015

Respectfully,



Joseph M. Sindoni  
Director - Regulatory Affairs

Attachments:

1. Response to Request for Additional Information Regarding License Amendment Request to Update Appendix B to Renewed Facility Operating Licenses.
2. PSEG letter to the National Marine Fisheries Service (LR-E14-0162) dated November 10, 2014.
3. Revised mark-up of proposed Technical Specification page for the Hope Creek Generating Station Renewed Facility Operating License.

cc: Mr. D. Dorman, Administrator, Region I, NRC  
Ms. C. Sanders-Parker, Project Manager, NRC  
NRC Senior Resident Inspector, Salem  
NRC Senior Resident Inspector, Hope Creek  
Mr. P. Mulligan, Manager IV, NJBNE  
PSEG Corporate Commitment Tracking Coordinator  
Salem Commitment Tracking Coordinator  
Hope Creek Commitment Tracking Coordinator

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**Attachment 1**

**Response to Request for Additional Information Regarding License Amendment Request  
to Update Appendix B to Renewed Facility Operating Licenses**

**Response to Request for Additional Information Regarding License Amendment Request  
to Update Appendix B to Renewed Facility Operating Licenses  
Hope Creek Generating Station and  
Salem Nuclear Generating Station, Units 1 and 2  
Docket Nos. 50-354, 50-272, and 50-311**

By letter dated December 9, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14343A926), PSEG Nuclear LLC (PSEG) submitted a license amendment request (LAR) to revise Appendix B of the Renewed Facility Operating Licenses for Salem Nuclear Generating Station, Units 1 and 2 (Salem, Units 1 and 2), and Hope Creek Generating Station, Unit 1 (Hope Creek) for Nuclear Regulatory Commission (NRC) staff review and approval.

The proposed amendments would revise the PSEG Environmental Protection Plans (EPPs) to clarify that PSEG must adhere to the currently applicable biological opinion issued by the National Marine Fisheries Service. The proposed changes would also simplify the Aquatic Monitoring section of the EPPs, modify reporting requirements related to the New Jersey Pollutant Discharge Elimination System permits, modify the criteria for reporting Unusual or Important Environmental Events, and remove the requirement for PSEG to submit an Annual Environmental Operating Report. To complete its review, the NRC staff requests a response to the questions below.

**REQUEST FOR ADDITIONAL INFORMATION**

1. Under the proposed LAR, Section 3.2 of the EPPs for Salem, Units 1 and 2 and Hope Creek would no longer contain requirements to provide copies of proposed changes to or renewals of New Jersey Pollutant Discharge Elimination System (NJPDES) permits to the NRC. PSEG's justification for this proposed change is that it "...would reduce unnecessary duplication of reports..." Under the proposed LAR, what regulation or other NRC requirement would continue to require PSEG to provide copies of proposed changes to or renewals of NJPDES permits to the NRC, such that the proposed LAR would reduce unnecessary duplication?

**PSEG Response 1:**

The NRC relies on the State of New Jersey for matters involving water quality. Section 3.1 of the EPP requires PSEG to provide a written evaluation and obtain NRC approval for any significant change in station effluents. The Section 3.1 reporting requirement ensures that the NRC would be notified regarding any significant proposed change to the facilities' NJPDES permits. Submitting copies of proposed changes to the NJPDES permits as currently specified in Section 3.2 of the EPP which do not meet the criteria in Section 3.1 is unnecessary inasmuch as the NRC relies on the State of New Jersey for matters involving water quality. As required by the proposed revisions to Section 3.2, PSEG will be required to ensure that the NRC has a copy of the currently applicable version of the facilities' NJPDES permits. Changes to the NJPDES permits or State certifications shall be reported to the NRC within 30 days of the date the change is approved.

2. The LAR proposes to delete the list of examples of unusual or important events from EPP Section 4.1 for Salem, Units 1 and 2, and Hope Creek. PSEG states that the list "may

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conflict with other regulatory guidance.” Explain how each of the following conflicts with NRC regulations or regulatory guidance:

PSEG Response 2:

PSEG is required under 10 CFR 50.72 to report “Any event or situation, related to ... protection of the environment, for which a news release is planned or notification to other government agencies has been or will be made.” PSEG also has obligations under many other State and Federal statutes to notify regulatory agencies regarding events involving protected species or unauthorized discharges to the environment. PSEG is required to report to the NRC within four hours of notifying another government agency regarding environmental issues. Having a separate list of generally described events or situations as currently specified in Section 4.1 of the EPP can be interpreted to be inconsistent with other State and Federal regulations and can create confusion and an unnecessary regulatory burden. The reporting examples proposed to be deleted from Section 4.1 are discussed in more details below.

a. Excessive bird impaction events

PSEG Response 2.a:

If some highly unusual event involving large numbers of birds were to occur onsite, PSEG would notify the New Jersey Department of Environmental Protection (NJDEP) as required by Fish and Game Law, and the U.S. Fish and Wildlife Services (USFWS) as prompted by the Migratory Bird Treaty Act. PSEG is required by 10 CFR 50.72 to report to the NRC non-routine notifications to other government agencies.

b. Onsite plant or animal disease outbreaks

PSEG Response 2.b:

These types of events would likely trigger involvement by the Salem County Health Department and/or the NJ Division of Fish and Wildlife if they were associated in some way with facility operation. PSEG is already required by 10 CFR 50.72 to report to the NRC non-routine notifications to these regulatory agencies.

c. Mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973

PSEG Response 2.c:

Regulatory reporting is already covered by the recently updated Section 7 Consultation, the Endangered Species Act (ESA), the Marine Mammal Protection Act, the Migratory Bird Treaty Act, and other state regulations. PSEG is required by 10 CFR 50.72 to report to the NRC non-routine notifications to other government agencies.

d. Fish kills or impingement events on the intake screens

PSEG Response 2.d:

The NJDEP has primary responsibility for implementing §316(b) [U.S.C. 1326(b)] of the Clean Water Act (CWA). Unusual events regarding fish would be reported to the NJ

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Division of Fish and Wildlife, which would in turn, trigger reporting in accordance with 10 CFR 50.72 to the NRC.

- e. Increase in nuisance organisms or conditions

PSEG Response 2.e:

Increases in nuisance organisms or conditions relating to thermal discharge are specifically addressed by NJDEP under CWA §316(a) [U.S.C. 1326(a)]. Some other episodic occurrence would likely involve discussion/reporting to the NJ Division of Fish and Wildlife, which would in turn, trigger reporting to the NRC.

- f. Unanticipated or emergency discharge of waste water or chemical substances

PSEG Response 2.f:

The unauthorized discharge of hazardous materials is strictly prohibited by NJ regulations, and requires immediate reporting to the NJDEP. Reporting to the NJDEP would trigger reporting to the NRC.

- 3. Under the proposed LAR, Salem, Units 1 and 2 EPP Section 4.2.1 would state, "PSEG Nuclear LLC shall adhere to the specific requirements within the currently applicable Incidental Take Statement, to the Biological Opinion."

- a. Describe or list the specific requirements within the Incidental Take Statement (ITS) that PSEG would adhere to under the currently applicable July 2014 Biological Opinion (BiOp) (ADAMS Accession No. ML 14202A146) (i.e., specify the Reasonable and Prudent Measures (RPMs) and Terms and Conditions (T&Cs) by number provided in the BiOp).

PSEG Response 3.a:

Specific listing of the RPMs with their non-discretionary implementing terms and conditions within the EPP is not necessary. Upon NRC approval of the LAR, PSEG is obligated to implement T&C #1 through #34. Compliance with the T&Cs is intended to satisfy the regulatory requirements of the RPMs.

- b. Clarify whether PSEG intends to include in the EPP all RPMs and T&Cs or only those that apply to both NRC and PSEG in the current BiOp and any future BiOps.

PSEG Response 3.b:

PSEG does not propose to include specific RPMs and T&Cs in the EPP. The proposed change includes reference to "the specific requirements within the currently applicable Incidental Take Statement, to the Biological Opinion" to allow future modifications to the ITS without requiring an LAR.

As explicitly stated in the ITS, the NRC has regulatory responsibility for only T&Cs #1 through #23. PSEG alone is responsible for compliance with T&Cs #24 through #34.

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- c. Concerning the ITS in the July 2014 BiOp, describe how PSEG intends to notify NRC of the distinct population segment for each Atlantic sturgeon that is incidentally taken at the trash bars or travelling screens to ensure that the NRC can reinstate consultation with National Marine Fisheries Service (NMFS) in a timely manner if the ITS limit is exceeded.

PSEG Response 3.c:

As specified by T&C #8, the NRC will be notified within 24 hours regarding the incidental take of any sturgeon (10 CFR 50.72 requires reporting within 4 hours of notifying the NMFS). If PSEG is able to get any genetic information from analyses of the required fin clips, that data would be provided in the annual report specified in T&C #9.

- d. Concerning T&C #1 of the July 2014 BiOp, provide a copy of the estimated trash bar cleaning frequency by season, which this T&C required PSEG to provide to the NMFS within 30 days of issuance of the BiOp.

PSEG Response 3.d:

PSEG has submitted an estimated cleaning frequency to the NMFS as required by T&C #1 (See Attachment 2). PSEG estimates that cleaning of the intake trash bars will occur at least once per week during all seasons.

- e. Concerning T&C #2 of the July 2014 BiOp, describe whether and what changes to inspection of the cooling water intake structures (if any) PSEG has implemented or intends to implement under the July 2014 BiOp.

PSEG Response 3.e:

PSEG's current procedures require periodic inspection of the Salem circulating water intake trash racks. Actions to review and revise procedures as necessary for inspection of cooling water intake trash bars to ensure compliance with T&C #2 will be completed before implementation of the proposed amendment.

- f. Concerning T&C #3 of the July 2014 BiOp, describe whether and what changes to lighting at the intake structure or trash racks (if any) PSEG has implemented or intends to implement under the July 2014 BiOp.

PSEG Response 3.f:

PSEG's current procedures address the use of supplemental lighting at night when performing inspections at the Salem circulating water intake trash racks. Actions to review and revise procedures as necessary for maintenance of lighting at the Salem intake structure / trash racks to ensure compliance with T&C #3 will be completed before implementation of the proposed amendment.

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- g. Concerning T&C #4 of the July 2014 BiOp, describe whether and what sea turtle rescue equipment changes (if any) PSEG has implemented or intends to implement under the July 2014 BiOp.

PSEG Response 3.g:

PSEG's current procedures address the use of dip nets, baskets and lifting equipment for recovery of sea turtles observed on the trash racks. Actions to review and revise procedures as necessary for availability of sea turtle rescue equipment at the Salem intake structure / trash racks to ensure compliance with T&C #4 will be completed before implementation of the proposed amendment.

- h. Concerning T&C #7 of the July 2014 BiOp, provide a copy of the formal letter from PSEG to NMFS specified in this T&C to be sent to NMFS within 60 days of receiving the July 2014 BiOp that details arrangements made with a NMFS-approved lab for Shortnose and Atlantic sturgeon fin clip processing.

PSEG Response 3.h:

A copy of the formal letter from PSEG to NMFS is provided as Attachment 2.

- i. Concerning T&C #8 of the July 2014 BiOp, describe changes, if any, PSEG intends to make to its procedures concerning reporting of live or dead sea turtles or sturgeon incidentally take[n] at the Salem, Units 1 and 2 trash bars or traveling screens as a result of this T&C.

PSEG Response 3.i:

PSEG's current procedures address reporting requirements for turtles and sturgeon taken at the Salem circulating water intake trash bars or traveling screen. Actions to review and revise procedures as necessary to ensure compliance with T&C #8 will be completed before implementation of the proposed amendment.

- j. Concerning T&C #9 of the July 2014 BiOp, confirm whether PSEG intends to submit to NMFS and the NRC an annual report for 2014 that includes the information specified in this T&C by March 15, 2015.

PSEG Response 3.j:

The ITS becomes effective upon approval of this LAR. PSEG will submit the first Annual Report for the year in which this LAR is approved.

- k. Concerning T&C #10 of the July 2014 BiOp, what stranding/rehabilitation facility has PSEG made arrangements with to respond to live and dead sea turtles collected from the Salem, Units 1 and 2 intakes?

PSEG Response 3.k:

PSEG has reaffirmed our relationship with the Marine Mammal Stranding Center (MMS) which will respond to live and dead sea turtles collected from the Salem Units 1 and 2 intakes (See Attachment 2).



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- I. Concerning T&C #11 of the July 2014 BiOp, what facility has PSEG made arrangements with to perform necropsies on dead sea turtles?

PSEG Response 3.l:

PSEG has reaffirmed our relationship with the MMSC which has made arrangements to work with the State of New Jersey, Department of Agriculture, Animal Health Diagnostic Lab to perform necropsies on dead sea turtles (See Attachment 2).

- m. Concerning T&Cs #15-23 of the July 2014 BiOp, describe any measures PSEG has taken to educate personnel regarding the July 2014 BiOp's T&Cs regarding Radiological Environmental Monitoring Program (REMP) gillnet sampling for Salem, Units 1 and 2, and Hope Creek.

PSEG Response 3.m:

The T&Cs regarding REMP gillnet sampling for Salem, Units 1 and 2, and Hope Creek have been provided to personnel responsible for implementing the REMP. Actions to review and revise procedures as necessary to ensure compliance with T&Cs #15-23 will be completed before REMP gillnet sampling is first performed after implementation of the proposed amendment.

- n. Concerning T&C #17 of the July 2014 BiOp, describe arrangements, if any, PSEG has made to ensure that at least one crew member performing REMP gillnet sampling is experienced in the identification of shortnose and Atlantic sturgeon.

PSEG Response 3.n:

PSEG's biological sampling personnel are experienced in the identification of shortnose and Atlantic sturgeon. Actions to review and revise sampling procedures as necessary to ensure compliance with T&C #17 will be completed before REMP gillnet sampling is first performed after implementation of the proposed amendment.

- o. Concerning T&C #18 of the July 2014 BiOp, describe any arrangements PSEG has made regarding the collection of shortnose and Atlantic sturgeon fin clip samples during REMP gillnet sampling pursuant to the T&C.

PSEG Response 3.o:

PSEG has not yet made arrangements regarding T&C #18. Actions to review and revise procedures regarding the collection of shortnose and Atlantic sturgeon fin clip samples during REMP gillnet sampling as necessary to ensure compliance with T&C #18 will be completed before REMP gillnet sampling is first performed after implementation of the proposed amendment.

As noted in PSEG's November 10, 2014 letter to NMFS (Attachment 2), NMFS has not yet provided a list of laboratories that can conduct the specified analyses, but PSEG will store any collected fin clips as per the BiOp Appendix B procedures until such time as a laboratory can be identified.

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- p. Concerning T&C #19 of the July 2014 BiOp, describe any arrangements PSEG has made regarding Passive Integrated Transponder tagging during REMP gillnet sampling pursuant to the T&C.

PSEG Response 3.p:

PSEG routinely scans captured sturgeon for Passive Integrated Transponder tags. Actions to review and revise procedures regarding the scanning of captured sturgeon during REMP gillnet sampling as necessary to ensure compliance with T&C #19 will be completed before REMP gillnet sampling is first performed after implementation of the proposed amendment.

- q. Concerning T&C #23 of the July 2014 BiOp, confirm whether PSEG intends to submit to NMFS and the NRC an annual report for 2014 that includes the information specified in this T&C by March 15, 2015.

PSEG Response 3.q:

The ITS becomes effective upon approval of this LAR. PSEG will submit the first Annual Report for the year in which this LAR is approved.

- r. Concerning the Conservation Recommendations in the July 2014 BiOp, describe whether PSEG has implemented or intends to implement any of NMFS's six recommendations concerning scientific study of shortnose and Atlantic sturgeon.

PSEG Response 3.r:

PSEG presently has no plans to conduct additional biological monitoring or scientific studies specifically targeting sturgeon. PSEG will continue to make available data from any ongoing biological monitoring programs regarding the presence and distribution of juvenile sturgeon within the vicinity of the Station.

- s. Concerning reinitiation of consultation, describe how PSEG intends to monitor and notify the NRC if it finds that any of the conditions, as provided in 50 CFR 402.16 and described under Section 13.0 of the July 2014 BiOp, are met that would require NRC to reinitiate consultation with NMFS.

PSEG Response 3.s:

The annual reports submitted by PSEG to NRC and the NMFS in accordance with T&C #9 will provide data to address the regulatory criteria triggering reinitiation, and also serve as a regular reminder regarding the issue.

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4. Under the proposed LAR, Hope Creek EPP Section 4.2.1 does not contain a statement that PSEG will adhere to the specific requirements within the currently applicable ITS to the BiOp as is proposed for Salem, Units 1 and 2 EPP Section 4.2.1. However, the ITS in the July 2014 BiOp contains requirements that apply to both Salem Units, 1 and 2, and Hope Creek.
  - a. Explain why PSEG does not propose to include such a statement.

PSEG Response 4.a:

As summarized in Section 9 of the BiOp, the NMFS does not anticipate any take of any listed species due to impingement or entrainment at Hope Creek. As a result, T&C #1 through #14 apply only to Salem Station. REMP sampling is required by the operating licenses for Salem Units 1 and 2, and Hope Creek, so T&C #15 through #23 apply to all three facilities. An additional proposed change to Hope Creek EPP Section 4.2.1 is described in Response 4.b below.

- b. Does PSEG believe the language in Hope Creek EPP Section 4.2.1, as proposed, requires PSEG to adhere to the specific requirements concerning Hope Creek in the currently applicable ITS to the BiOp?

PSEG Response 4.b:

PSEG proposes to revise Hope Creek EPP Section 4.2.1 to refer to “the specific requirements within the currently applicable Incidental Take Statement, to the Biological Opinion,” consistent with the changes already proposed to the Salem EPPs. A revised marked up Section 4.2.1 of the Hope Creek EPP is provided as Attachment 3.

5. Under the proposed LAR, EPP Section 5.4.1 for Salem, Units 1 and 2, and Hope Creek would be deleted, which would remove the requirement for PSEG to provide the NRC with an Annual Environmental Operating Report (AEOR).
  - a. In the LAR, PSEG states that "information previously contained in the AEOR would continue to be gathered and available through other reporting and/or inspection mechanisms." Describe these reporting and inspection mechanisms.

PSEG Response 5.a:

As specified in Section 3.2 of the EPP, PSEG will continue to report any changes to the facilities' NJPDES Permits. As discussed in Sections 4.1 and 5.4.2 of the EPP, PSEG will continue to submit nonroutine reports following unusual or important environmental events. Finally, as required by Section 3.1, PSEG will maintain records of all changes to the facility design or operation, including the determination regarding unreviewed environmental questions. This onsite documentation will continue to be available for NRC inspection.

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- b. The AEOR includes information on threatened and endangered species removed from the Circulating Water System each year. Confirm that the information typically included in the AEOR regarding threatened and endangered species would be provided to the NRC in the annual report of incidental takes required by T&C #9 of the July 2014 BiOp.

PSEG Response 5.b:

PSEG will submit an annual report of incidental takes at the trash bars and traveling screens to both the NRC and the NMFS. As specified in T&C #9, this annual report will include detailed information regarding each incidental take, and any potential additional measures implemented to further reduce the mortality of protected species.

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**Attachment 2**

**PSEG letter to the National Marine Fisheries Service (LR-E14-0162),  
dated November 10, 2014**

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



**CERTIFIED MAIL # 7013 2630 0000 0535 8023**

November 10, 2014  
LR-E14-0162

NMFS Greater Atlantic Regional Fisheries Office  
55 Great Republic Drive  
Gloucester, MA 01930  
Attn: Section 7 Coordinator

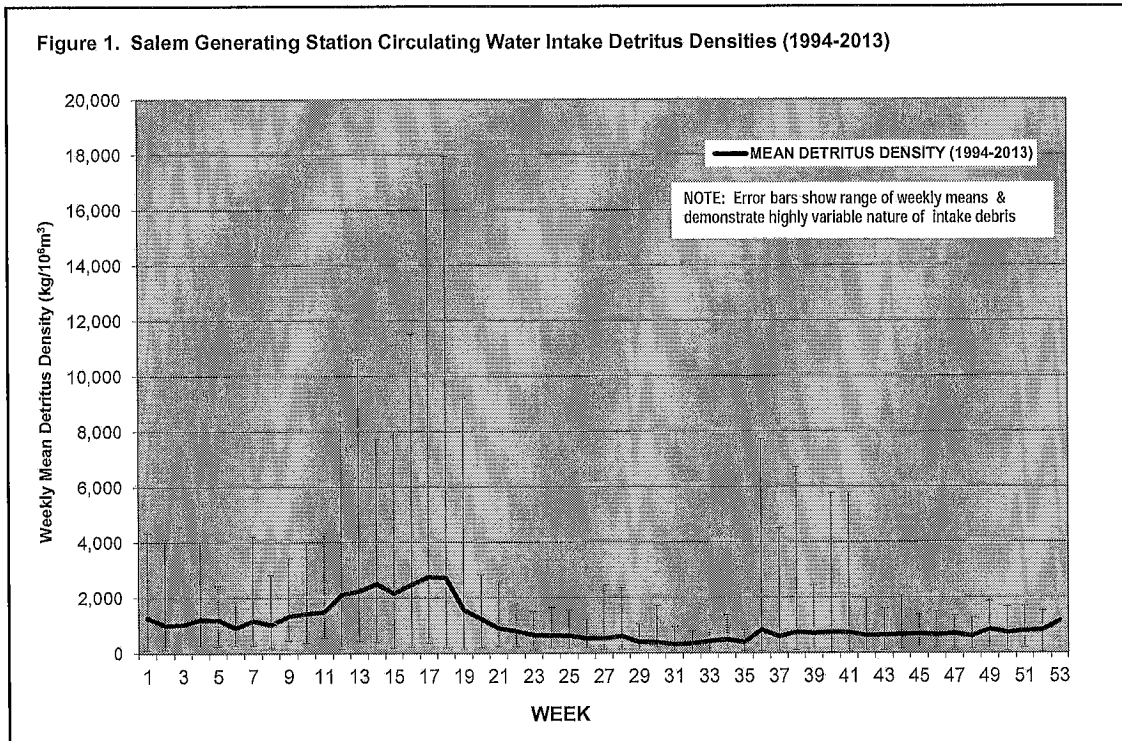
Dear Coordinator:

**BIOLOGICAL OPINION FOR SALEM UNITS 1 AND 2  
TERMS AND CONDITIONS #1, #7 AND #10**

The U.S. Nuclear Regulatory Commission (NRC) and the National Marine Fisheries Service (NMFS) concluded formal consultation under section 7 of the Endangered Species Act of 1973, as amended (ESA) on July 17, 2014, with NMFS's issuance of a final biological opinion for Salem Nuclear Generating Station, Units 1 and 2 (Salem), and Hope Creek Generating Station, Unit 1 (Hope Creek). PSEG has received a copy of the Biological Opinion from the NRC and is preparing for implementation of the Terms and Conditions contained therein upon NRC approval of modifications to Renewed Facility Operating Licenses DPR-70, DPR-75, and NPF-57. Certain of the Terms and Conditions require submittal of additional information to NMFS Greater Atlantic Regional Fisheries Office (GARFO). The following information is being submitted by PSEG in satisfaction of these requirements.

**Terms & Conditions Paragraph No.1:** As specified in Paragraph No. 1 of the Terms and Conditions, PSEG must provide NMFS with an estimated frequency by season for cleaning of the circulating water intake trash bars. PSEG must maintain flow through the intake trash bars as necessary to minimize intake velocity, to provide sufficient cooling water flow to the steam condensers, and to maintain full-power operation. Salem, therefore, has operational incentives to clean the trash bars as dictated by river conditions. Historical data on the stranding of sea turtles indicates that turtles are no longer being recovered from below the water surface by raking; and that raking of the trash bars may, in fact, cause some mortality of healthy sturgeon that use the river bottom habitat immediately adjacent to the trash racks.

The amount of river debris that will accumulate on the intake trash bars and require raking is highly variable and is difficult to predict. As shown below in Figure 1, the density of river detritus generally remains relatively steady during most of the year and increases during late winter-early spring. Although increased frequency of trash rack raking is required during the peak detritus season, the timing and level of detritus is notoriously difficult to predict, and elevated levels do not even occur during some years with milder weather.



Given the difficulty in predicting seasonal periods when increased trash rack raking may be required, PSEG cannot estimate when more frequent cleaning will be required, but can estimate that cleaning of the intake trash bars will occur at least once per week during all seasons.

**Terms & Conditions Paragraph No.7:** As specified in Paragraph No. 7 of the Terms and Conditions, PSEG will be collecting fin clips from any shortnose or Atlantic sturgeon recovered from the Salem intake for genetic analyses. Genetic analyses using mitochondrial DNA (mtDNA), which is maternally inherited, and nuclear DNA (nDNA), which reflects the genetics of both parents, can be used to differentiate individual subpopulations. PSEG has contacted the NMFS Section 7 Coordinator to ask for a list of individuals/facilities with the appropriate ESA authority and technical ability to carry out the genetic identification (K. Strait to J. Crocker, email 10/09/2014). NMFS has not yet provided a list of laboratories that can conduct the specified analyses, but PSEG will store any collected fin clips as per the BiOp Appendix B procedures until such time as a

laboratory can be identified. Once a list of laboratories can be provided, PSEG will make arrangements for sample transfer and discuss the schedule for sample processing with the identified facility.

**Terms & Conditions Paragraph No.10:** As specified in Paragraph No. 10 of the Terms and Conditions, PSEG must make arrangements with a stranding/rehabilitation facility for response to any sea turtles collected from the Salem intakes. PSEG has a long-standing relationship with the Marine Mammal Stranding Center (MMSC) in Brigantine, New Jersey and has re-affirmed that the MMSC is willing to provide the necessary assistance with transport, evaluation, veterinary care, tagging, and release of any potential sea turtles recovered at Salem Station. The MMSC works with the State of New Jersey, Department of Agriculture, Animal Health Diagnostic Lab on the conduct of necropsies for dead marine mammals and sea turtles. When necessary, the MMSC will arrange for necropsy on any dead sea turtles recovered at Salem Station, and will coordinate with Department of Agriculture's veterinary pathologist to obtain necropsy reports.

PSEG may be able to provide additional information regarding arrangements with the individual/facility identified for genetic analyses of sturgeon fin clips once NMFS provides a list. If you have any questions or require additional information, please do not hesitate to contact Alison Kraus, Manager - Nuclear Environmental Affairs at (856) 339-7900, or Kenneth Strait, Manager- Biological Programs at (856) 339-3929.

Sincerely



Lawrence M. Wagner  
Plant Manager – Salem



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**Attachment 3**

**Revised mark-up of proposed Technical Specification page for the Hope Creek  
Generating Station Renewed Facility Operating License**

**Revised TS Page**  
Appendix B, 4-1

4.0 Environmental Conditions

If an event is reportable under 10 CFR 50.72, then a duplicate immediate report under this Subsection is not required. However, a written report is required in accordance with Section 5.4.2.

4.1 Unusual or Important Environmental Events

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and reported to the NRC within 24 hours followed by a written report per Subsection 5.4.2. ~~The following are examples: excessive bird impaction events; onsite plant or animal disease outbreaks; mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973; fish kills; increase in nuisance organisms or conditions; and unanticipated or emergency discharge of waste water or chemical substances.~~

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Aquatic Monitoring

threatened or endangered species

The certifications and permits required under the Clean Water Act provide mechanisms for protecting water quality and, indirectly, aquatic biota. The NRC will rely on the decisions made by the State of New Jersey under the authority of the Clean Water Act and, in the case of ~~sea turtles and shortnose sturgeon~~, decisions made by the National Marine Fisheries Service (NMFS) under the authority of the Endangered Species Act for any requirements pertaining to aquatic monitoring.

INSERT: PSEG Nuclear LLC shall adhere to the specific requirements within the currently applicable Incidental Take Statement, to the Biological Opinion.