

From: Ennis, Rick
Sent: Tuesday, July 18, 2017 9:14 AM
To: Duke, Paul R.
Cc: Timberman, Tanya J
Subject: Request for Additional Information - Salem Units 1 and 2 - Accident Monitoring Instrumentation License Amendment Request (CACs MF8859 & 60)
Attachments: final rai01 mf8859-60.doc

By letter dated November 17, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16323A279), PSEG Nuclear LLC (PSEG, the licensee) submitted a license amendment request (LAR) for Salem Nuclear Generating Station (Salem), Unit Nos. 1 and 2. The amendments would revise Technical Specification (TS) requirements regarding accident monitoring instrumentation. Specifically, the amendments would modify the list of instruments required to be operable based on implementation of Regulatory Guide 1.97, Revision 2, dated December 1980, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident" (ADAMS Accession No. ML06075052). In addition, allowed outage times (AOTs) and required actions for inoperable accident monitoring instrumentation channels would be revised to be consistent with NUREG-1431, Revision 4, "Standard Technical Specifications – Westinghouse Plants" (ADAMS Accession Nos. ML12100A222 and ML12100A228).

The Nuclear Regulatory Commission's (NRC) staff is reviewing your submittal and has determined that additional information is needed to complete its review. The specific request for additional information (RAI) questions are attached. The RAI questions were provided in draft form to Mr. Paul Duke of the PSEG staff via e-mail on July 17, 2017. The draft questions were sent to ensure that the questions were understandable, the regulatory basis for the questions was clear, and to determine if the information was previously docketed.

By e-mail dated July 18, 2017, Mr. Duke stated that a conference call to discuss the draft RAIs was not needed. Mr. Duke indicated that PSEG would provide a response to the RAI questions by August 17, 2017.

If you have any questions, please contact me at (301) 415-1420.

Richard B. Ennis, Senior Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-272 and 50-311

REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED LICENSE AMENDMENT
ACCIDENT MONITORING INSTRUMENTATION TECHNICAL SPECIFICATIONS
PSEG NUCLEAR LLC
EXELON GENERATION COMPANY, LLC
SALEM NUCLEAR GENERATING STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-272 AND 50-311

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Division of Operating Reactor Licensing (DORL)

Reviewer: Rick Ennis

RAI-DORL-1

On July 22, 1993 (58 FR 39132), the Commission published a "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (Final Policy Statement) which discussed the criteria to determine which items are required to be included in the TSs as Limiting Conditions for Operation (LCOs). The criteria were subsequently incorporated into the regulations by an amendment to 10 CFR 50.36 (60 FR 36953, July 19, 1995). Specifically, 10 CFR 50.36(c)(2)(ii) requires that a TS LCO be established for each item meeting one or more of the following criteria:

- Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.
- Criterion 2: A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

- Criterion 3: A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.
- Criterion 4: A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

As discussed in the *Federal Register* notice for the final rule dated July 19, 1995 (60 FR 36955):

LCOs that do not meet any of the criteria, and their associated actions and surveillance requirements, may be proposed for relocation from the technical specifications to licensee-controlled documents, such as the FSAR [Final Safety Analysis Report]. The criteria may be applied to either standard or custom technical specifications.

As discussed in the Final Policy Statement (58 FR 39138):

When licensees submit amendment requests based on this Policy Statement, they should identify the location of and controls for the technical and administrative requirements of the relocated requirements. The NRC staff will carefully review these submittals to ensure the accountability and the acceptability of controls for each relocated requirement. Many of the requirements will be relocated to the FSAR and will be enforceable through 10 CFR 50.59. Other requirements will be relocated to more appropriate documents (e.g., Security Plan, QA Plan) and controlled by the applicable regulatory requirements. The adequacy of controls for relocated requirements which do not fit in the above categories will be reviewed and approved by the NRC staff on a case-by-case basis to determine, among other things, whether an enforceable control method will need to be established.

Salem TS Limiting Condition for Operation (LCO) 3.3.3.7 requires that the accident monitoring instrumentation channels shown in TS Table 3.3-11 be operable in Modes 1, 2 and 3. The proposed amendments would delete several of the accident monitoring instrumentation channels listed in the Table. However, the LAR does not identify the location of and controls for the technical and administrative requirements of the relocated requirements. Consistent with the expectations stated in the Final Policy Statement, please identify the specific licensee-controlled document for the proposed relocated requirements (e.g., FSAR, Technical Requirements Manual). In addition, specify the regulatory controls that will pertain to the relocated requirements (e.g., 10 CFR 50.59).