



MAY 07 2018

10 CFR 72.30(c)(1)-(4)

LR-N18-0040

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

Salem and Hope Creek Independent Spent Fuel Storage Installation
NRC Docket No. 72-48

Peach Bottom Independent Spent Fuel Storage Installation
NRC Docket No. 72-29

Subject: Response to Request for Additional Information (RAI), Regarding
Decommissioning Funding Plan Update for Salem and Hope Creek, and Peach
Bottom Independent Spent Fuel Storage Installations, Docket Nos. 72-48 and
72-29 (CAC No. 001028)

Reference:

1. NRC letter to PSEG, Request for Additional Information Regarding
Decommissioning Funding Plan Update for Salem and Hope Creek, and Peach
Bottom Independent Spent Fuel Storage Installations, Docket Nos. 72-48 and
72-29, CAC No. 001028, dated April 5, 2018 (ADAMS Accession Nos.
ML18094B084 and ML18094B083) (CAC No. 001028)
2. PSEG Nuclear letter to the NRC, Decommissioning Funding Plan for
Independent Spent Fuel Storage Installations, dated December 17, 2015
3. PSEG Nuclear letter to the NRC, Report on Status of Decommissioning Funding
for Reactors and Independent Spent Fuel Storage Installations, dated
March 29, 2017

By letter dated December 17, 2015 (Reference 2), PSEG Nuclear LLC (PSEG) submitted the required decommissioning funding plan for the Salem and Hope Creek, and Peach Bottom Independent Spent Fuel Storage Installations (ISFSIs).

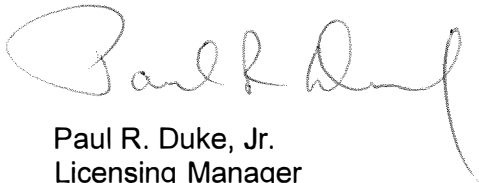
The Nuclear Regulatory Commission (NRC) staff reviewed PSEG's decommissioning funding plan updates for each ISFSI and concluded that additional information is necessary to meet the intent of the requirement in 10 CFR 72.30(c). Specifically, the NRC needs additional information to determine that the events listed in 10 CFR 72.30(c)(1)-(4) have been specifically addressed with respect to the 2015 PSEG decommissioning funding plan updates submittal. By letter dated April 5, 2018 (Reference 1), the additional information was requested. The PSEG response to the request for additional information (RAI) is provided in Attachment 1 to this letter.

By letter dated March 29, 2017 (Reference 3), PSEG again submitted required decommissioning funding plan updates covering the ISFSIs, which contains the same level of detail regarding the four events in 10 CFR 72.30(c) as the 2015 submittal (Reference 1). Therefore, the PSEG response to the RAI provided in Attachment 1 to this letter also specifically addresses the events listed in 10 CFR 72.30(c)(1)-(4) with respect to the 2017 decommissioning funding plan updates.

There are no regulatory commitments contained in this letter.

Should you have any questions regarding this submittal, please contact Ms. Tanya Timberman at 856-339-1426.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul R. Duke, Jr.", written in black ink.

Paul R. Duke, Jr.
Licensing Manager

Attachment:

1. Response to Request for Additional Information

cc: Administrator, Region I, NRC
Project Manager, NRC
NRC Senior Resident Inspector, Salem
NRC Senior Resident Inspector, Hope Creek
Mr. P. Mulligan, Chief, NJBNE
Salem Commitment Tracking Coordinator
Hope Creek Commitment Tracking Coordinator
Corporate Commitment Tracking Coordinator

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Attachment 1

Response to Request for Additional Information

**Response to Request for Additional Information (RAI)
Regarding PSEG Nuclear LLC/s Decommissioning Fund Plan Update for
Hope Creek Generating Station, Salem Generating Station, Units 1 and 2
And Peach Bottom Atomic Power Station, Units 2 and 3
Independent Spent Fuel Storage Installations
Docket Nos. 72-48 and 72-29**

Regulatory Requirement

Pursuant to Title 10 of the *Code of Federal Regulations* (CFR) 72.30(c), at the time of license renewal and at intervals not to exceed 3 years, the decommissioning fund plan (DFP) required to be submitted by 10 CFR 72.30(b) must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. The DFP must update the information submitted with the original or prior approved plan. In addition, the DFP must also specifically consider the effect of the following events on decommissioning costs, as required by 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

Background

By letter dated December 17, 2015, PSEG Nuclear LLC (PSEG) submitted, for U.S. Nuclear Regulatory Commission (NRC) staff review and approval, decommissioning fund plan updates (DFP Updates) for the independent spent fuel storage installations at Hope Creek Generating Station, Salem Generating Station, Units 1 and 2 and Peach Bottom Atomic Power Station, Units 2 and 3 (Agencywide Documents Access and Management System Accession No. ML15351A336). The NRC staff reviewed PSEG's DFP updates for each independent spent fuel storage installation (ISFSI) and believes PSEG's submittal was not sufficient to meet the intent of the requirement in 72.30(c). Specifically, the DFP updates do not provide sufficient information to allow the NRC to determine that the events listed in 10 CFR 72.30(c)(1)-(4) have been specifically considered.

RAI 1:

For each ISFSI, provide a revised DFP that includes the effect on decommissioning costs of each of the events listed in 10 CFR 72.30(c)(1)-(4): (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material, (2) facility modifications, (3) changes in authorized possession limits, and (4) actual remediation costs that exceed the previous cost estimate.

PSEG Response to RAI 1:

With respect to the 2015 PSEG decommissioning funding plan updates for the Hope Creek Generating Station, Salem Generating Station, Units 1 and 2 and Peach Bottom Atomic Power Station, Units 2 and 3 ISFSIs submitted to the NRC by letter dated December 17, 2015 (Reference 1), the following statements specifically address the events defined in 10 CFR 72.30(c):

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Attachment 1

1. No spills of radioactive material producing additional residual radioactivity in onsite subsurface material have occurred.
2. Facility modifications have not had an effect on ISFSI decommissioning costs.
3. There were no changes in authorized possession limits.
4. No active decommissioning has occurred; thus, there have not been any actual remediation costs that exceed the previous cost estimate.

Therefore, based on the above information and the fact that the events defined in 10 CFR 72.30(c)(1)-(4) have had no effect on decommissioning costs, PSEG has concluded that the decommissioning funding plan updates (both 2015 and 2017) for each plant's ISFSI remain valid.

References:

1. PSEG Nuclear letter to the NRC, Decommissioning Funding Plan for Independent Spent Fuel Storage Installations, dated December 17, 2015
2. PSEG Nuclear letter to the NRC, Report on Status of Decommissioning Funding for Reactors and Independent Spent Fuel Storage Installations, dated March 29, 2017