



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BLVD., Suite 100
KING OF PRUSSIA, PA 19406-2713**

April 29, 2019

Mr. Peter Sena, III
President and Chief Nuclear Officer
PSEG Nuclear LLC – N09
P.O. Box 236
Hancocks Bridge, NJ 08038

**SUBJECT: RESIDENT INSPECTOR STAFFING REQUEST AT SALEM AND HOPE CREEK
GENERATING STATIONS**

Dear Mr. Sena:

I am responding to your letter (LR-N18-0122) dated December 4, 2018, (ADAMS Accession No. ML18340A024¹) in which you requested that the NRC review and adjust the resident inspector staffing levels at Salem and Hope Creek to be consistent with the staffing levels for a single, multi-unit site consisting of three units. Currently Salem and Hope Creek are treated as separate inspection programs consisting of one dual unit and one single unit program respectively. The basis for your request, as stated in the letter, included organizational and governance alignment initiatives which have been implemented over the last two years that were designed to operate the site as a single nuclear generating facility. You indicated that this site management approach is different than when the NRC Commission approved SECY-99-227, "N+1 Resident Inspector Staffing Policy," and also provided a view that differences in the technologies and design of the units should not preclude approval of this request.

My staff, in consultation with NRR, reviewed the request and carefully considered the points raised in your letter. In addition we had multiple discussions with members of your staff and management to ensure a complete understanding of the basis for your request. We reviewed a number of relevant factors including applicable agency guidance, the inspection programs at other multi-unit sites, the distinct organizations at Salem and Hope Creek, and the technological and design differences between the plants to assess the impact that approval of your request would have on the effectiveness of the resident inspection program. Resident inspectors perform many vital roles including maintaining an awareness of plant conditions, event response, and conducting independent inspections. Our program relies on their ability to develop and maintain an in-depth knowledge and familiarization with both the site staff and plant systems.

We determined that maintaining the current inspection program is necessary to support the continued effective and efficient oversight of Salem and Hope Creek. Key factors in arriving at this decision included the fact that PSEG maintains separate staff and managers for most of the major departments at Salem and Hope Creek, the significant technological and design differences between the units, and comparison to the inspection programs at other multi-unit sites. Further, the implementation of many important programs and activities at your site

¹ The designation in parentheses refers to an Agencywide Documents Access and Management System (ADAMS) Accession Number. Documents referenced in this letter are publicly available using the Accession Number in ADAMS.

remains distinctly different between Salem and Hope Creek. As such, resident inspector activities to satisfy all inspection program objectives would need to remain separate between Salem and Hope Creek. For comparison, our review regarding other units across the country determined that multi-unit sites with a common NRC inspection program predominantly have the same technology and same organizational structure for each unit.

Notwithstanding the above, NRC has adjusted its inspection program in areas (i.e., security and emergency preparedness) where PSEG operates under a common organizational structure. We recognize there may be additional commonalities in your programs and processes related to other NRC inspection areas and are always open to feedback where we may be able to gain further inspection program efficiencies. It is also important to note that the on-going Reactor Oversight Process (ROP) program review may identify or result in further inspection program changes.

Should you have any questions or comments concerning this letter, please contact Brice Bickett at (610) 337-5312.

Sincerely,

/RA/

David C. Lew
Regional Administrator
Region I

Docket Nos. 50-354, 50-311, 50-272
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