



10 CFR 50.90

LR-N22-0051
LAR S22-03
LAR H22-01
June 22, 2022

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

Salem 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: License Amendment Request to Relocate Technical Specification Facility/Unit Staff Qualification Requirements to the PSEG Nuclear LLC Quality Assurance Topical Report

Reference: 1. NRC Administrative Letter 95-06: "Relocation of Technical Specification Administrative Controls Related to Quality Assurance"

In accordance with the provisions of 10 CFR 50.90, PSEG Nuclear LLC (PSEG) is submitting a request for an amendment to the Technical Specifications (TS) for Salem Generating Station Units 1 and 2 (Salem) and for Hope Creek Generating Station (Hope Creek).

The proposed change relocates the Salem Facility Staff Qualification ANSI N18.1-1971 and Hope Creek Unit Staff Qualification ANSI/ANS-3.1-1981 Requirements to the PSEG Quality Assurance Topical Report (QATR), consistent with the NRC Administrative Letter 95-06 (Reference 1) guidance.

The Enclosure provides a description and assessment of the proposed changes. Attachment 1 provides the existing TS pages marked up to show the proposed changes.

PSEG requests review and approval of this license amendment request within one year of acceptance. Once approved, the amendment shall be implemented within 120 days.

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In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated State of New Jersey Official.

There are no regulatory commitments contained in this letter.

If there are any questions or if additional information is needed, please contact Mr. Brian Thomas at 856-339-2022.

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

Executed on June 22, 2022
(Date)

Respectfully,

David Mannai
Executive Director - Regulatory Affairs & Nuclear Oversight

Enclosure: Description and Assessment of the Proposed Changes
Attachment 1 Technical Specification Marked-Up Pages

cc: Mr. D. Lew, Administrator, Region I, NRC
Mr. J. Kim, NRC Project Manager, NRC
NRC Senior Resident Inspector, Salem
NRC Senior Resident Inspector, Hope Creek
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PSEG Corporate Commitment Tracking Coordinator
Site Commitment Tracking Coordinator

Enclosure

Description and Assessment of the Proposed Changes

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1 SUMMARY DESCRIPTION

The proposed change relocates the Salem Unit 1 and 2 Facility Staff Qualification ANSI N18.1-1971 and Hope Creek Unit Staff Qualification ANSI/ANS-3.1-1981 Requirements (References 1 and 2) to the PSEG Nuclear LLC (PSEG) Quality Assurance Topical Report (QATR) (Reference 3).

2 DETAILED DESCRIPTION

2.1 Proposed Changes

The specific Technical Specification (TS) changes are shown in Attachment 1 and are discussed below.

Salem Unit 1 and Unit 2 TS 6.3.1 currently states:

Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the individual designated as the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, the individual designated as the Operations Manager who shall meet or exceed the minimum qualifications of ANSI N18.1-1971 except as modified by Specification 6.3.3, and the licensed operators who shall comply with the requirements of 10 CFR 55.

The proposed change will revise Salem TS 6.3.1 to read as follows:

Each member of the facility staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the PSEG Nuclear Quality Assurance Topical Report.

Hope Creek TS 6.3.1 currently states:

Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 for comparable positions, except for the individual designated as the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, the individual designated as the operations manager who shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 except as modified by Specification 6.3.3, and the licensed operators who shall comply with the requirements of 10 CFR Part 55.

The proposed change will revise Hope Creek TS 6.3.1 to read as follows:

Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions as specified in the PSEG Nuclear Quality Assurance Topical Report.

2.2 Reason for the Proposed Change

The existing TS requirements for unit staff qualifications are based on NRC endorsed industry standards to ensure that a licensee's staff is appropriately qualified for their respective positions. Currently, Regulatory Guide (RG) 1.8 Revision 4, June 2019, "Qualification and Training of Personnel for Nuclear

Power Plants," endorses ANSI/ANS-3.1-2014, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants" (Reference 4), with certain exceptions and clarifications. PSEG desires to relocate to the QATR the TS ANSI N18.1-1971 and ANSI/ANS 3.1-1981 (References 1 and 2) in order to eliminate future license amendment requests due only to upgrades to future revisions to the ANSI/ANS 3.1 standard and RG 1.8.

3 TECHNICAL EVALUATION

The proposed change will relocate the TS Facility/Unit Staff Qualification ANSI N18.1-1971 and ANSI/ANS 3.1-1981 requirements to the PSEG QATR. The requirements will be relocated verbatim to the QATR.

This LAR does not change any current staff qualification requirements for Salem or Hope Creek and is only an administrative TS change.

10 CFR 50.36(c)(5) requires TS to include administrative controls. Items include provisions relating to organization and management, procedures, recordkeeping, review and audit and reporting to assure operation of the facility in a safe manner. In 1995, the NRC acknowledged that many license amendments were being processed (e.g., organizational changes, position title changes, organization description changes, procedure review process, etc.) to relocate TS items to the licensee's quality assurance plan. The items being relocated from TS did not satisfy the criteria of 10 CFR 50.36 for inclusion as a limiting condition for operation and were adequately controlled by other regulations and related licensee programs. The NRC issued Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," to address this issue and to provide additional guidance for relocating TS administrative controls to the licensee's quality assurance plan.

AL 95-06 stated that the quality assurance program is a logical candidate for such relocations due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of U.S. Nuclear Regulatory Commission-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The relocation of technical specification requirements in cases where adequate controls are provided by such other methods can reduce the resources spent by licensees and the NRC staff in preparing and reviewing license amendment requests.

The proposed changes are consistent with the guidance in AL 95-06 for relocating a licensee's TS administrative control requirements to its quality assurance plan. The facility/unit staff qualifications do not satisfy the criteria of 10 CFR 50.36 for inclusion in TS as a limiting condition for operation and are adequately controlled by other regulations and PSEG training programs. PSEG meets the training requirements specified in 10 CFR 55, "Operators' Licenses," 10 CFR 50.120, "Training and qualification of nuclear power plant personnel," and NUREG-1021, "Operator Licensing Examination Standards for Power Reactors." In addition, on March 20, 1985, the NRC issued the Commission Policy Statement on Training and Qualification of Nuclear Power Plant Personnel, which endorsed the training accreditation program developed by INPO, in association with National Academy for Nuclear Training (NANT). The NRC has documented discussion, approval, and acceptance of NANT guidelines in RIS 01-001, "Eligibility of Operator License Applicants," and NUREG 1021, "Operator Licensing Examinations Standards for Power Reactors." PSEG training programs employ the systematic approach to training (SAT) required by

10 CFR 50.120 as embodied in the INPO NANT standards for plant staff personnel and their qualifications.

In summary, the proposed changes do not change current staff qualification requirements. The TS facility/unit staff qualification requirements will be relocated verbatim to the PSEG QATR. Future changes to the PSEG QATR are required to be made in accordance with 10 CFR 50.54(a).

4 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met. PSEG has determined that existing requirements continue to be met and that the proposed changes do not require any exemptions or relief from regulatory requirements. The following current applicable regulations and regulatory requirements were reviewed in making this determination:

10 CFR 50.36

10 CFR 50.36, "Technical specifications," Paragraph (c)(5), "Administrative controls," requires provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting to be included in the technical specification that are necessary to assure operation of the facility in a safe manner. The proposed changes conform to 10 CFR 50.36(c)(5) requirements.

10 CFR 50.120

10 CFR 50.120, "Training and qualification of nuclear power plant personnel," requires that each nuclear power plant licensee or applicant for an operator license to establish, implement, and maintain the training and qualification programs that are derived from a systems approach to training as defined in 10 CFR 55.4. The proposed changes conform to 10 CFR 50.120 requirements.

10 CFR 55

10 CFR 55, "Operators' Licenses," Subpart D, "Applications," requires that operator license applications include information concerning an individual's education, experience, and other related matters to provide evidence and certification that the applicant has successfully completed the facility licensee's training program that is based on a systems approach to training. The proposed changes conform to 10 CFR 55 requirements.

NUREG-1021, Revision 12

NUREG-1021, "Operator Licensing Examination Standards for Power Reactors," establishes the policies, procedures, and practices for examining licensees and applicants for reactor operator and senior reactor operator licenses at nuclear power reactor facilities under 10 CFR Part 55, "Operators' Licenses." The PSEG operator training program meets the current requirements of NANT document, ACAD 10-001. The proposed changes conform to NUREG-1021 requirements.

Regulatory Guide 1.8

Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," describes a method that the NRC staff finds acceptable for complying with the NRC's regulations regarding training and qualification of nuclear power plant personnel. The proposed changes maintain the current commitments and exceptions to RG 1.8, as identified in current TS staff qualifications requirements, and are being relocated verbatim to the QATR.

Administrative Letter 95-06

AL 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance," discusses relocation of technical specification administrative controls related to quality assurance requirements to licensee controlled documents. The proposed change to relocate TS facility/unit staff qualification requirements is consistent with the guidance in AL 95-06, as discussed in Section 3 above.

4.2 Precedent

The proposed change is consistent with NRC-approved license amendments issued to Pacific Gas and Electric Company on September 11, 2020 (References 5 and 6); Duke Energy Corporation on August 12, 2020 (References 7 and 8); Exelon Generation Company, LLC on August 2, 2018 (References 9 and 10); and Tennessee Valley Authority (TVA) on March 27, 2017 (References 11 and 12).

The amendments revised the technical specifications for each facility to relocate the licensees' staff qualification requirements to licensee controlled documents.

4.3 No Significant Hazards Consideration Determination Analysis

PSEG has evaluated whether a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change is administrative in nature, does not make any physical changes to the plants, and does not alter accident analysis assumptions, add any initiators or affect the function of plant systems, or the manner in which systems are operated, maintained, tested, or inspected. The proposed change does not require any plant modifications which affect the performance capability of the structures, systems and components relied upon to mitigate the consequences of postulated accidents. The facility/unit staff qualification requirements remain the same and are being relocated from the Technical Specifications (TS) to the PSEG Quality Assurance Topical Report (QATR).

Therefore, it is concluded that this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not involve changes to unit/facility staff selection, qualification and training programs. The proposed change is administrative in nature and does not impact physical plant systems. The qualification standards are being relocated from the TS to the PSEG QATR. As a result, the ability of the plant to respond to and mitigate accidents is unchanged by the proposed change. The proposed change does not alter accident analysis assumptions, add any initiators, or affect the function of plant systems or the manner in which systems are operated, maintained, modified, tested, or inspected.

Therefore, it is concluded that this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed change is administrative in nature. The proposed change does not affect plant design, hardware, system operation, or procedures for accident mitigation system. The proposed change does not impact any plant safety margins that are established in existing limiting conditions for operation, limiting safety systems settings and specified safety limits. There is no change in the established safety margins of these systems. The proposed change does not impact the performance or proficiency requirements for licensed operators or unit/facility staff, since the qualification standards are not changing and are only being relocated from the TS to the PSEG QATR. As a result, the ability of the plant to respond to and mitigate accidents is unchanged by the proposed change.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6 REFERENCES

1. ANSI N18.1-1971, "American National Standard for Selection and Training of Nuclear Power Plant Personnel."
2. ANSI-ANS-3.1-1981, "Selection, Qualification and Training of Personnel for Nuclear Power Plants."
3. PSEG Nuclear LLC Quality Assurance Topical Report (QATR).
4. ANSI/ANS 3.1 2014, "Selection, Qualification, and Training of Personnel for Nuclear Power Plants"
5. Diablo Canyon Nuclear Power Plant, Units 1 and 2 - Issuance of Amendment Nos. 237 and 239 to Relocate Technical Specification 5.3, "Unit Staff Qualifications," to the updated Final Safety Analysis Report (EPID L-2019-LLA-0268), dated September 11, 2020 (ADAMS Accession No. ML20218A276).
6. License Amendment Request to Relocate Technical Specification 5.3, "Unit Staff Qualifications," to the Updated Final Safety Analysis Report, dated December 5, 2019 (ADAMS Accession No. ML19339F388)
7. Brunswick Steam Electric Plant, Units 1 and 2; Catawba Nuclear Station, Units 1 and 2; Shearon Harris Nuclear Power Plant, Unit 1; McGuire Nuclear Station, Units 1 and 2; Oconee Nuclear Station, Units 1, 2, and 3; and H. B. Robinson Steam Electric Plant, Unit No. 2 – Issuance of Amendments to Relocate the Unit/Facility/Plant Staff Qualification Requirements to the Duke Energy Quality Assurance Program Description (EPID L-2019-LLA-0142), dated August 12, 2020 (ADAMS Accession No. ML20083F927).
8. License Amendment Application to Relocate Technical Specification Unit/Facility Staff Qualification ANSI N18.1-1971, ANSI/ANS-3.1-1978 and ANSI/ANS-3.1-1981 Requirements to the Duke Energy Corporation Quality Assurance Program Description (DUKE-QAPD-001-A), dated July 8, 2019 (ADAMS Accession No. ML19189A033).
9. Exelon Fleet Issuance of Amendments to Relocate the Staff Qualification Requirements (EPID L-2018-LLA-0053), dated August 2, 2018 (ADAMS Accession No. ML18206A282).
10. Exelon Fleet License Amendment Request to Relocate Technical Specification Unit/Facility/Plant Staff Qualification ANSI N18.1-1971 and ANSI/ANS-3.1-1978 Requirements to the Exelon Quality Assurance Topical Report (QATR), dated March 1, 2018 (ADAMS Accession No. ML18060A266).
11. Browns Ferry Nuclear Plant, Units 1, 2, and 3, and Sequoyah Nuclear Plant, Units 1 and 2 - Issuance of Amendments Re: Changes to Technical Specification 5.3, "Unit Staff Qualifications" (CAC Nos. MF7607, MF7608, MF7609, MF7610, and MF7611), dated March 27, 2017 (ADAMS Accession No. ML17034A360).

12. Application to Revise the Technical Specifications for the Browns Ferry Nuclear Plant (TS-504) and Sequoyah Nuclear Plant (TS 16-02) on Unit Staff Qualifications to Achieve Consistency between the Tennessee Valley Authority Nuclear Plants, dated April 14, 2016 (ADAMS Accession No. ML16105A287).

Attachment 1
Technical Specification Marked-Up Pages

The following Technical Specifications pages for Renewed Facility Operating License DPR-70 are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
6.3.1, Facility Staff Qualifications	6-7

The following Technical Specifications pages for Renewed Facility Operating License DPR-75 are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
6.3.1, Facility Staff Qualifications	6-7

The following Technical Specifications pages for Renewed Facility Operating License NPF-57 are affected by this change request:

<u>Technical Specification</u>	<u>Page</u>
6.3.1, Unit Staff Qualifications	6-6

ADMINISTRATIVE CONTROLS

6.2.3 SHIFT TECHNICAL ADVISOR

6.2.3.1 The Shift Technical Advisor shall serve in an advisory capacity to the Senior Nuclear Shift Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

6.2.3.2 The Shift Technical Advisor shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.

6.3 FACILITY STAFF QUALIFICATIONS

referenced for comparable positions as specified in the PSEG Nuclear Quality Assurance Topical Report



~~6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the individual designated as the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, the individual designated as the Operations Manager who shall meet or exceed the minimum qualifications of ANSI N18.1-1971 except as modified by Specification 6.3.3, and the licensed operators who shall comply with the requirements of 10CFR55.~~

6.3.2 The Operations Manager or Assistant Operations Manager shall hold an SRO license. The Senior Nuclear Shift Supervisors and Nuclear Shift Supervisors shall each hold a senior reactor operator license. The Nuclear Control Operators shall hold reactor operator licenses.

6.3.3 The Operations Manager shall meet one of the following:

- 1) Hold an SRO license, or
- 2) Have held an SRO license for a similar unit (PWR), or
- 3) Have been certified at an appropriate simulator for equivalent senior operator knowledge.

6.4 DELETED

ADMINISTRATIVE CONTROLS

6.2.3 SHIFT TECHNICAL ADVISOR

6.2.3.1 The Shift Technical Advisor shall serve in an advisory capacity to the Senior Nuclear Shift Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

6.2.3.2 The Shift Technical Advisor shall have a Bachelor's Degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents.

6.3 FACILITY STAFF QUALIFICATIONS

referenced for comparable positions as specified in the PSEG Nuclear Quality Assurance Topical Report



~~6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the individual designated as the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, the individual designated as the Operations Manager who shall meet or exceed the minimum qualifications of ANSI N18.1-1971 except as modified by Specification 6.3.3, and the licensed operators who shall comply with the requirements of 10CFR55.~~

6.3.2 The Operations Manager or Assistant Operations Manager shall hold an SRO license. The Senior Nuclear Shift Supervisors and Nuclear Shift Supervisors shall each hold a senior reactor operator license. The Nuclear Control Operators shall hold reactor operator licenses.

6.3.3 The Operations Manager shall meet one of the following:

- 1) Hold an SRO license, or
- 2) Have held an SRO license for a similar unit (PWR), or
- 3) Have been certified at an appropriate simulator for equivalent senior operator knowledge.

6.4 DELETED

ADMINISTRATIVE CONTROLS

6.2.3 SHIFT TECHNICAL ADVISOR

6.2.3.1 The Shift Technical Advisor shall provide advisory technical support to the Senior Nuclear Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capability to operate in the control room.

referenced for comparable positions as specified in the PSEG Nuclear Quality Assurance Topical Report

6.3 UNIT STAFF QUALIFICATIONS

~~6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 for comparable positions, except for the individual designated as the Radiation Protection Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, the individual designated as the operations manager who shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1981 except as modified by Specification 6.3.3, and the licensed operators who shall comply with the requirements of 10 CFR Part 55.~~

6.3.2 The Operations Manager or Assistant Operations Manager shall hold a senior reactor operator license. The Senior Nuclear Shift Supervisors, and Nuclear Shift Supervisors, shall hold a senior reactor operator license. The Nuclear Control Operators shall hold a reactor operator license.

6.3.3 The Operations Manager shall meet one of the following:

- (1) Hold a senior reactor operator license, or
- (2) Have held a senior reactor operator license for this or a similar unit (BWR), or
- (3) Have been certified at an appropriate simulator for equivalent senior operator knowledge.

6.4 TRAINING

6.4.1 DELETED

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Fire Protection Manager and shall meet or exceed the requirements of the SRP (NUREG-0800) Section 13.2.2.II.6, 10 CFR 50 Appendix R and Branch Technical Position CMEB 9.5.1, Section C.3.d.

6.5 REVIEW AND AUDIT (THIS SECTION DELETED)