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TITLE: Waste Confidence—Continued Storage of Spent Nuclear Fuel

COMMENT#: 00630

From: Duke, Paul R. [<mailto:Paul.Duke@pseg.com>]
Sent: Friday, December 20, 2013 1:23 PM
To: RulemakingComments Resource
Cc: Daly, Brendan M; Kraus, Alison R.
Subject: Docket ID NRC-2012-0246

PSEG Nuclear LLC's comments are attached. Please let me know if you need any other information.

Paul Duke
Manager - Licensing, PSEG Nuclear LLC
856-339-1466
856-285-6347(c)

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LR-N13-0296
December 20, 2013

Secretary, U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
ATTN: Rulemakings and Adjudications Staff

Subject: Response to Request for Comments - Waste Confidence-Continued Storage of
Spent Nuclear Fuel (78FR56776, dated September 13, 2013, Docket ID NRC-
2012-0246)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments published in the Federal Register on September 13, 2013 (78FR56776) concerning the NRC's proposed revision to the generic determination on the environmental impacts of the continued storage of spent nuclear fuel beyond a reactor's licensed life for operation and prior to ultimate disposal.

PSEG Nuclear LLC (PSEG) appreciates the opportunity to comment on this subject and offers the attached comment for consideration by the NRC.

If you have any questions or require additional information, please contact Mr. Brendan Daly at 856-339-7903.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul R. Duke, Jr.", written over a horizontal line.

Paul R. Duke, Jr.
Manager - Licensing

Attachment

Response to Request for Comments
Waste Confidence-Continued Storage of Spent Nuclear Fuel

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments published in the Federal Register on September 13, 2013 (78FR56776) concerning the NRC's proposed revision to the generic determination on the environmental impacts of the continued storage of spent nuclear fuel beyond a reactor's licensed life for operation and prior to ultimate disposal.

Appendix E to Draft NUREG-2157, "Waste Confidence Generic Environmental Impact Statement" (DGEIS), describes the environmental impacts of spent fuel pool leaks that may occur during the short-term storage timeframe. Section E.3 reviews the history of spent fuel pool leaks at commercial nuclear power plants.

Table E-4, "Occurrence of Spent Fuel Pool Leakage at U.S. Nuclear Power Plants." lists sites at which spent fuel pool leakage has occurred based on data and information available to the NRC. Salem Unit 2 is incorrectly listed as having released radioactive liquid to the environment from spent fuel pool leakage.

As noted in NUREG/CR-7111, "A Summary of Aging Effects and Their Management in Reactor Spent Fuel Pools, Refueling Cavities, Tori, and Safety-Related Concrete Structures," in 2010, evidence of a small leak was noted to be present in the Unit 2 telltale drain system.

The Unit 2 spent fuel pool leakage is properly characterized as contained within spent fuel pool leakage-collection system. DGEIS Table E-4 should be revised accordingly.