



January 31, 2014
ND-2014-0003

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

Subject: **PSEG POWER, LLC
Docket No. 52-043
Documents in Support of Application
Early Site Permit for the PSEG Site
Comments on Advanced Safety Evaluation for Chapter 13, Section
13.3, "Emergency Planning"**

Reference: 1) Letter from P. Chowdhury, USNRC, to J. Mallon, PSEG Power, LLC, PSEG EARLY SITE PERMIT APPLICATION - ADVANCED SAFETY EVALUATION WITH NO OPEN ITEMS FOR CHAPTER 13, SECTION 13.3, "EMERGENCY PLANNING", dated January 15, 2014

In Reference 1, USNRC transmitted the Advanced Safety Evaluation with No Open Items for Chapter 13, Section 13.3, "Emergency Planning", associated with PSEG's Early Site Permit (ESP) application, for review to confirm that the Advanced Safety Evaluation does not include any proprietary information that PSEG would seek to withhold under 10 CFR 2.390, or contain any factual errors.

PSEG has completed the review of the above referenced safety evaluation and has determined that the safety evaluation does not include any proprietary information that PSEG would seek to withhold under 10 CFR 2.390.

During PSEG's review of the advanced safety evaluation for Chapter 13, Section 13.3, PSEG compiled a list of comments that could improve the accuracy and clarity of the safety evaluation. These comments are included in Enclosure 1 to this letter.

If additional information is needed, please contact David Robillard, PSEG Nuclear Development Licensing Engineer, at (856) 339-7914.

AX45
D079
NRD

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 31st day of January, 2014.

Respectfully,

A handwritten signature in black ink, appearing to read "James Mallon", written in a cursive style.

James Mallon
Early Site Permit Manager
Nuclear Development
PSEG Power, LLC

Enclosure 1: List of Comments on Advanced Safety Evaluation for Chapter 13, Section 13.3, "Emergency Planning"

cc: USNRC Project Manager, Division of New Reactor Licensing, PSEG Site
(w/enclosure)
USNRC Environmental Project Manager, Division of New Reactor Licensing
(w/enclosure)
USNRC Region I, Regional Administrator (w/o enclosure)

PSEG Letter ND-2014-0003, dated January 31, 2014

Enclosure 1

List of Comments on Advanced Safety Evaluation for

Chapter 13, Section 13.3, "Emergency Planning"

5 Pages

Advanced SER Review Comments

SER Chapter/Section: Chapter 13 Title: Chapter 13, Section 13.3, "Emergency Planning"		
Comment No.	Page	Comment
1.	13-5	Section 13.3.4, 2 nd complete paragraph on the page, 1 st sentence: Change to: "... Section 13.3, "Emergency Plan ..."
2.	13-6	Section 13.3.4.1, 1 st para., 1 st sentence: Change to: "...after consultation with FEMA ..." 10 CFR 52.18 refers to consultation with FEMA, not DHS
3.	13-6	Section 13.3.4.1, 1 st para., 2 nd sentence: Change to: "... Site Permit Application ", ..." This is the full title of NUREG-0654, Supplement 2.
4.	13-7	2 nd para. on page, last sentence: Suggest revising to: "... ETE Report.)
5.	13-8	Section 13.3.4.2, 1 st para., last sentence: Change to: "... Section IV.B, and NUREG-0800, Section 13.3, Subsection II. "
6.	13-8	Section 13.3.4.2, 2 nd para., last sentence: Change to: "... Section IV.B, and NUREG-0800, Section 13.3, Subsection II. "
7.	13-9	The text in the paragraph preceding the COL Action Item states, in part: "... a COL that references this ESP shall update the emergency preparedness information that was provided under 10 CFR 52.17(b), and discuss whether the updated information materially changes the bases for compliance with applicable NRC requirements." The COL Action Item requests PSEG to do what it is already required to do under the regulations. PSEG requests that the COL Action Item be deleted for this reason. This justification also applies to COL Action Items 13.3-2 through 13.3-8.
8.	13-9	Section 13.3.4.2, para., after COL Action Item 13.3-1, 2 nd sentence: Change to: "... are consistent with NUREG-0800, Section 13.3, Subsection II. "
9.	13-9	Section 13.3.4.2, para., after COL Action Item 13.3-1, 3 rd sentence: Change to: "... are consistent with NUREG-0800, Section 13.3, Subsection II. "
10.	13-10	Section 13.3.4.3.1, last para., 1 st sentence: Change to: "ESP Plan Section 2.2.0 , ..."

Comment No.	Page	Comment
11.	13-11	Section 13.3.4.3.1, 3 rd para., 2 nd sentence: Suggest revising to: "... 3-1 through 3-4."
12.	13-12	Section 13.3.4.3.1, 2 nd para. on page, 4 th sentence: Change to: "... Section 7, "Emergency Communications ," describes ..."
13.	13-14	Section 13.3.4.3.2, 2 nd para., on page, 1 st sentence: Change to: "ESP Plan Section 3.2.0 , "Normal ..."
14.	13-16, 13-68, 13-69	Permit Conditions 1 and 2: Suggest revising the wording to indicate that the staffing assessment be performed in accordance with the latest NRC-endorsed revision of NEI 12-01.
15.	13-16, 13-68, 13-69	Permit Conditions 1 and 2: Suggest revising the wording to clarify the timing of the staffing assessment. Although the conditions discuss a COL applicant performing the assessment, the conditions also state that the licensee will submit the assessment to the NRC at least 180 days before fuel load. It appears that these conditions should utilize the language that a COL applicant shall propose a license condition to perform the assessment, similar to the language for Permit Conditions 3, 4, and 5.
16.	13-18, 13-69	Permit Condition 3: Suggest revising the wording to indicate that the on-shift staffing analysis be completed in accordance with the latest NRC-endorsed version of NEI 10-05.
17.	13-18	Section 13.3.4.3.2, second to last para., last sentence: Suggest revising to: "... addressed in Permit Condition 3."
18.	13-21	Section 13.3.4.3.4, 1 st para., 2 nd complete sentence: Suggest revising to: "... emergency conditions that involve alerting or activating progressively larger segments of the total emergency organization,..." This is the wording in 10 CFR Part 50, Appendix E, Section IV.C(1).
19.	13-22	Continuation of sentence from Page 13-21: Change to: "... provided in the Event Classification Guide (ECG)."
20.	13-22	Section 13.3.4.3.4, 7th para., third sentence: Change to: "Permit Conditions 4 and 5 (below) address ..."
21.	13-23, 13-69	Permit Condition 4: This condition states that the EALs are to be developed in accordance with the specified revision of NEI 07-01 "with no deviations." This restriction could result in unnecessary amendment requests. Instead, suggest revising "with no deviations" to "any deviations should be fully described." This is similar to the wording in Permit Condition 5.

Comment No.	Page	Comment
22.	13-25	Section 13.3.4.3.5, 2 nd complete para. on page, last sentence: The sentence states, in part: "(See Permit Condition 11 in Section 13.3.4.3.10 of this report, ..." There is no Permit Condition 11 in Section 13.3.4.3.10 or in the SER.
23.	13-25	3 rd full paragraph, 1 st sentence: Change to: "... Control Room, TSC or EOF."
24.	13-25	Last para. on page, 5 th sentence: Change to: "... in Section 13.3.4.3.9 of this report."
25.	13-25	Last para. on page, 6 th sentence: Change to: "... in Section 13.3.4.3.10 of this report."
26.	13-30	Under Fukushima Dai-ichi – NTTF Recommendation 9.3, 4 th para., 1 st sentence: Should "Permit Condition 2" be "COL Action Item 13.3-2"?
27.	13-32	Section 13.3.4.3.7, 1 st para., 2 nd complete sentence: Change to: "... local EOCs and a limited number of news media."
28.	13-32	Section 13.3.4.3.7, 4 th para., last sentence: ITAAC 8.1.1.F is not included in Table 13.3-1.
29.	13-32	Section 13.3.4.3.7, 5 th para., 2 nd sentence: ITAAC 6.3, 6.5, 6.6, 6.8, 8.1.1.E.2.b, 8.1.3, and 10 are not included in Table 13.3-1.
30.	13-35	Section 13.3.4.3.8, 8 th para., last sentence: ITAAC 8.1.1.D.2 is not included in Table 13.3-1.
31.	13-35	Section 13.3.4.3.8, 9 th para., last sentence: ITAAC 6.4 is not included in Table 13.3-1.
32.	13-36	Section 13.3.4.3.8, 13 th para., 2 nd bullet: Suggest revising the wording to: "... Team Response – TSC"
33.	13-37	Under Emergency Operations Facility, 2 nd sentence: Suggest revising the wording to: "... PSEG Energy and Environmental Center ..."
34.	13-40	Section 13.3.4.3.9, 3 rd para., 1 st sentence: Suggest revising the wording to: "... Section 10.1.1 ..."
35.	13-42	Section 13.3.4.3.9, 10 th para., 2 nd and 3 rd sentences: ITAAC 6.2 and 6.3 are not included in Table 13.3-1.
36.	13-42	Section 13.3.4.3.9, 11 th para., 3 rd sentence: Suggest revising the wording to: "... located 118 m (386 ft) south of the primary ..." (See ESPA Rev. 2, SSAR Section 2.3.3.2, page 2.3-38)

Comment No.	Page	Comment
37.	13-42	Section 13.3.4.3.9, 11 th para., last sentence: ITAAC 6.4 is not included in Table 13.3-1.
38.	13-42	Section 13.3.4.3.9, 12 th para., last sentence: ITAAC 6.5 is not included in Table 13.3-1.
39.	13-43	Section 13.3.4.3.9, 14 th para., last sentence: ITAAC 6.8 is not included in Table 13.3-1.
40.	13-43	Section 13.3.4.3.9, 16 th para., 1 st sentence: ITAAC 6.6 is not included in Table 13.3-1.
41.	13-46	First full sentence at top of page: Change to: "... also lists EPIP NC.EP-EP.ZZ-0902(Q) ..."
42.	13-47	Section 13.3.4.3.10, 14 th para., last sentence: ITAAC 8.1.1.D.2 is not included in Table 13.3-1.
43.	13-49	Section 13.3.4.3.11, 4 th para., last sentence: ITAAC 8.1.1.E.2.b is not included in Table 13.3-1.
44.	13-50	Section 13.3.4.3.11, 5 th para., 6 th sentence: ITAAC 8.1.1.E.2.a is not included in Table 13.3-1.
45.	13-55	Section 13.3.4.3.13, 1 st para., next to last sentence: Change to: "... radiation dose rates and dose limits ..."
46.	13-57	Section 13.3.4.3.14, 4 th para., 4 th sentence: Suggest revising the wording to: "... with an 8-year period."
47.	13-57	Section 13.3.4.3.14, 4 th para., 5 th sentence: Suggest revising the wording to: "... once every 8 years ..."
48.	13-57	Section 13.3.4.3.14, 7 th para., 2 nd sentence: ITAAC 8.1.1.G.1 is not included in Table 13.3-1.
49.	13-57	Section 13.3.4.3.14, 8 th paragraph, 2 nd sentence: ITAAC 8.1.2 is not included in Table 13.3-1
50.	13-58	Section 13.3.4.3.14, 9 th para., 7 th bullet, last sentence: Suggest revising the wording to: "... once every 8 years ."
51.	13-58	Section 13.3.4.3.14, 9 th para., 8 th bullet, last sentence: Suggest revising the wording to: "... once every 8 years ."
52.	13-58	Section 13.3.4.3.14, 9 th para., 9 th bullet: Suggest revising the wording to: "... once every 8 years ."

Comment No.	Page	Comment
53.	13-59	Section 13.3.4.3.14, 10 th para., 3 rd sentence: ITAAC 8.1.3 is not included in Table 13.3-1.
54.	13-63	Section 13.3.4.3.17, 2 nd para., 2 nd sentence: Suggest revising the wording to: "... February 2012)."
55.	13-64	Section 13.3.4.3.17, 2 nd full paragraph on page, 4 th sentence: Change to: "... evacuation of vehicles from the Shadow Region. "
56.	13-68	Permit Condition 1, 1 st sentence: Change to: "... plan for response to a multi-unit event." The phrase "to satisfy the regulatory requirements" is not contained in Permit Condition 1 in Section 13.3.4.3.2.
57.	13-68	Permit Condition 1, 4 th sentence: Change to: "... 180 days ..."
58.	13-70	ITAAC 2.1 Acceptance Criteria: Change to: "... Control Room, TSC or EOF."
59.	13-72	EP Program Element 3.2: Suggest revising the wording to: "... [F.1.f]. "
60.	13-75	Acceptance Criteria 6.9: Suggest revising the wording to: "... were successfully compared ..."
61.	13-77	Table 13.3-1, ITAAC 8.0: Under Acceptance Criteria 8.1.1.B.1.b: Change to: "...classification for an Alert or higher."