



10 CFR 50.90

LR-N16-0175
LAR S16-08
LAR H16-09
October 17, 2016

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

Salem Nuclear 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 - Administrative Controls

Pursuant to 10 CFR 50.90, PSEG Nuclear LLC (PSEG) hereby requests an amendment to Renewed Facility Operating License Nos. DPR-70 and DPR-75 for Salem Nuclear Generating Station Units 1 and 2 and NPF-57 for Hope Creek Generating Station. In accordance with 10 CFR 50.91(b)(1), a copy of this request for amendment has been sent to the State of New Jersey.

The proposed changes would remove the Technical Specification Section 6.4 plant training program requirements which refer to the requirements of 10 CFR 55 for licensed operators or which have been superseded by the requirements contained in 10 CFR 50.120. The proposed changes are consistent with the Standard Technical Specifications.

Attachment 1 to this letter provides an evaluation supporting the proposed changes. The marked-up TS pages with the proposed changes are provided in Attachment 2.

There are no regulatory commitments contained in this letter.

PSEG requests NRC approval of the proposed License Amendments by February 6, 2017 to enable PSEG to fully implement industry initiatives associated with general employee training in advance of the Spring 2017 refueling outage at Salem Unit 2. Upon approval, the amendments will be implemented within 60 days.

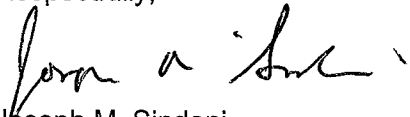
The proposed changes have been reviewed by the respective Plant Operations Review Committees.

If you have any questions or require additional information, please contact Mr. Paul Duke at 856-339-1466.

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

Executed on October 17, 2016
(Date)

Respectfully,



Joseph M. Sindoni
Senior Director - Regulatory Affairs
PSEG Nuclear LLC

Attachments:

1. Description of Proposed Changes, Technical Analysis, and Regulatory Analysis
2. Markup of Technical Specification pages

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

Attachment 1

Salem Nuclear Generating Station
Renewed Facility Operating License Nos. DPR-70 and DPR-75
NRC Docket Nos. 50-272 and 50-311

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License Amendment Request - Administrative Controls

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1. DESCRIPTION

The proposed changes would revise the Salem Unit 1 and Unit 2 and Hope Creek Technical Specifications (TS) to remove the administrative TS Section 6.4 plant training program requirements which refer to the requirements of 10 CFR 55 for licensed operators or which have been superseded by the requirements contained in 10 CFR 50.120.

2. PROPOSED CHANGE

The proposed change would remove Salem Unit 1 and Unit 2 and Hope Creek administrative TS Section 6.4, "Training," plant training program requirements which refer to the requirements of 10 CFR 55 for licensed operators or which have been superseded by the requirements for non-licensed personnel contained in 10 CFR 50.120.

Salem Unit 1 and 2 TS 6.4.1 currently states:

A retraining and replacement training program for the facility staff shall:

- 1) be coordinated by each functional level manager (Department Head) at the facility and maintained under the direction of the Director - Nuclear Training
- 2) meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 for all affected positions except licensed operators and
- 3) comply with the requirements of 10 CFR 55 for licensed operators.

Administrative TS Section 6.4 would be deleted from the Salem Unit 1 and Unit 2 TS. The TS Index for the Salem Unit 1 and Unit 2 TS would be revised to reflect deletion of Section 6.4.

Hope Creek TS 6.4.1 currently states:

A retraining and replacement training program for the unit staff shall: 1) be maintained under the direction of the Director - Nuclear Training, 2) shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI/ANS 3.1-1981 for all affected positions except licensed operators, and 3) comply with the requirements of 10 CFR Part 55 for licensed operators.

Administrative TS 6.4.1 would be deleted from the Hope Creek TS. Hope Creek administrative TS 6.4.2 is unaffected by the proposed change.

3. BACKGROUND

The existing TS requirements for the licensed operator retraining and replacement training program refer to the requirements of 10 CFR 55. The existing TS requirements for retraining and replacement training programs for non-licensed personnel are based on NRC endorsed industry standards to ensure that a licensee's staff is appropriately qualified and trained for their respective positions. These requirements were developed prior to the 1993 edition of 10 CFR 50.120.

10 CFR Part 55 contains the regulatory requirements for licensed operators at nuclear power plants, including requirements for their training. Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR 55 and Confirming Amendments," dated March 19, 1987 (Reference 1), transmitted the revised version of 10 CFR 55 to licensees and informed licensees of their option to substitute an accredited training program based on a systems approach to training for initial and requalification training programs previously approved by the NRC.

10 CFR 50.120, "Training and qualification of nuclear power plant personnel," which became effective on May 26, 1993, requires that nuclear power plant licensees establish, implement and maintain a training program derived from a systems approach to training as defined in 10 CFR 55.4 for specified categories of nuclear plant personnel. The training program must incorporate the instructional requirements necessary to provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation.

The Salem and Hope Creek training programs for licensed operators and for the nine categories of personnel listed in 10 CFR 50.120 have been accredited by INPO and are based on a systems approach to training.

4. TECHNICAL ANALYSIS

The NRC concluded in NUREG-1262 (Reference 2) and RIS 2001-01 (Reference 3) that the standards and guidelines applied by INPO in their training accreditation program are equivalent to those put forth or endorsed by the NRC. Therefore, maintaining an INPO accredited, systems based licensed operator training program is equivalent to maintaining an NRC approved licensed operator training program which conforms to applicable NRC Regulatory Guides or NRC endorsed industry standards.

TS 6.4.1 refers to 10 CFR 55 for licensed operator retraining and replacement training program requirements. Therefore, the requirements for licensed operator retraining and replacement training requirements may be deleted from TS because they are redundant to the requirements of 10 CFR 50.55.

The training program for appropriate unit staff personnel other than licensed operators is addressed by 10 CFR 50.120. With the 10 CFR 50.120 rule, the NRC is emphasizing the need to ensure that industry personnel training programs are based upon job performance requirements. Personnel who are subjected to training based on job performance requirements should be able to perform their jobs more efficiently and with fewer errors. This is accomplished using the systems approach to training implemented by INPO accredited training programs for selected nuclear personnel. Included within the rule is the requirement that the training program must reflect industry experience. Therefore, due to the existence of 10 CFR 50.120, there is no need to maintain the reference to training of unit staff personnel within TS 6.4.1.

The proposed changes remove TS requirements that are were redundant to or superseded by the requirements contained in 10 CFR 55 and 10 CFR 50.120; and, therefore, their removal from the TSs will not affect the requirement of 10 CFR 50.36(c)(5) to maintain administrative controls that assure the operation of the facility in a safe manner. The proposed changes do not affect the accident analyses contained in the Salem and Hope Creek updated final safety analyses reports (UFSARs).

Responsibility for the coordination and direction of the retraining and replacement training program is not required to be included in Technical Specifications to assure operation of the facility in a safe manner.

The proposed changes are consistent with NUREG-1431, Volume 1, Revision 4, "Standard Technical Specifications Westinghouse Plants" (Reference 4), and with NUREG-1433, Volume 1, Revision 4, "Standard Technical Specifications General Electric BWR/4 Plants" (Reference 5).

5. REGULATORY ANALYSIS

5.1. No Significant Hazards Consideration

PSEG Nuclear has evaluated whether or not 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 an administrative change to remove the plant staff retraining and replacement training program requirements from the TS. The proposed change does not directly impact accidents previously evaluated. The Salem and Hope Creek licensed operator training programs have been accredited by the Institute of Nuclear Power Operations (INPO) and are based on a systems approach to training. The proposed TS changes take credit for the INPO accreditation of the licensed operator training programs and require continued compliance with the requirements of 10 CFR 55. The TS requirements for all other unit staff qualifications remain unchanged.

The training program for appropriate unit staff personnel other than licensed operators is addressed by 10 CFR 50.120. With the 10 CFR 50.120 rule, the NRC is emphasizing the need to ensure that industry personnel training programs are based upon job performance requirements. Personnel who are subjected to training based on job performance requirements should be able to perform their jobs more efficiently and with fewer errors. This is accomplished using the systems approach to training implemented by INPO accredited training programs for selected nuclear personnel. Included within the rule is the requirement that the training program must reflect industry experience.

Therefore, the proposed 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 TS changes are administrative changes to clarify the current requirements for training programs and conform to 10 CFR 55 and 10 CFR 50.120.

The Salem and Hope Creek training programs for licensed operators and for non-licensed in the nine categories of personnel listed in 10 CFR 50.120 have been accredited by INPO and are based on a systems approach to training. The proposed TS changes take credit for the INPO accreditation of training programs and require continued compliance with the requirements of 10 CFR 55 and 10 CFR 120. The TS requirements for unit staff qualifications remain unchanged.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No.

The proposed changes are administrative in nature and do not affect the plant design, hardware, system operation, or operating procedures. The change does not exceed or alter a design basis or safety limit and thus does not reduce the margin of safety.

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

Based on the above, PSEG Nuclear concludes that the proposed amendment(s) present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2. Applicable Regulatory Requirements/Criteria

10 CFR 50.120, "Training and qualification of nuclear power plant personnel," which became effective on May 26, 1993, requires that nuclear power plant licensees establish, implement and maintain a training program derived from a systems approach to training as defined in 10 CFR 55.4. The training program must incorporate the instructional requirements necessary to provide qualified personnel to operate and maintain the facility in a safe manner in all modes of operation.

10 CFR 50.36 contains requirements for items to be included in Technical Specifications. Administrative controls are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

10 CFR Part 55 contains the regulatory requirements for licensed operators at nuclear power plants, including requirements for their training and qualification.

5.3. Precedent

The NRC approved similar proposed changes to remove plant staff retraining and replacement training program requirements listed below:

1. St. Lucie Units 1 and 2, Amendments 210 and 159 dated December 28, 2010 (TAC Nos. ME3489 AND ME3490), Accession No. ML103440495
2. Diablo Canyon Units 1 and 2, Amendments 187 and 189 dated May 26, 2006 (TAC Nos. MC8880 AND MC8881), Accession No. ML061280564
3. Limerick Units 1 and 2, Amendments 160 and 122 dated June 14, 2002 (TAC Nos. MB2692 AND MB2693), Accession No. ML021270233
4. Turkey Point Units 3 and 4, Amendments 201 and 195 dated October 6, 1999 (TAC Nos. MA4964 AND MA4965), Accession No. ML013390567

The precedent licensing actions are similar to the proposed changes for Salem and Hope Creek. The regulatory basis for the precedent licensing actions is the same as the regulatory basis for the proposed changes for Salem and Hope Creek.

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.

6. ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to 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.

7. REFERENCES

1. Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing - 10 CFR 55 and Confirming Amendments," March 19, 1987
2. NUREG-1262, "Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on Operators' Licenses," November 1987
3. Regulatory Issue Summary 2001-01, "Eligibility of Operator License Applicants," January 18, 2001
4. NUREG-1431, Volume 1, Revision 4, "Standard Technical Specifications Westinghouse Plants"
5. NUREG-1433, Volume 1, Revision 4, "Standard Technical Specifications General Electric BWR/4 Plants"

Attachment 2

Salem Nuclear Generating Station
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Hope Creek Generating Station
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NRC Docket No. 50-354

TECHNICAL SPECIFICATION PROPOSED CHANGES

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

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


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

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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

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 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall:

- 1) be coordinated by each functional level manager (Department Head) at the facility and maintained under the direction of the Director - Nuclear Training
- 2) meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 for all affected positions except licensed operators and
- 3) comply with the requirements of 10CFR55 for licensed operators.

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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

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 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall:

- 1) be coordinated by each functional level manager (Department Head) at the facility and maintained under the direction of the Director - Nuclear Training
- 2) meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 for all affected positions except licensed operators and
- 3) comply with the requirements of 10CFR55 for licensed operators.

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 capabilities of instrumentation and controls in the control room.

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 A retraining and replacement training program for the unit staff shall 1) be maintained under the direction of the Director - Nuclear Training, 2) shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI/ANS 3.1-1981 for all affected positions except licensed operators, and 3) comply with the requirements of 10 CFR Part 55 for licensed operators.

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)