

NRR-DRMAPEm Resource

From: Kim, James
Sent: Thursday, October 3, 2019 2:36 PM
To: Duke, Paul R.
Cc: Marabella, Lee A.
Subject: Hope Creek, Salem 1 and 2 - Final RAI RE: Emergency Plan Staffing Requirements (L-2019-LLA-0145)
Attachments: Final RAI-PSEG Radiological EP Plan.docx

Mr. Duke,

By letter dated July 8, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML ML19189A316), Public Service Enterprise Group Nuclear, LCC (PSEG, the licensee) submitted a license amendment request (LAR) for Hope Creek Generating Station and Salem Generating Station Units 1 and 2. The amendments would revise certain Emergency Response Organization (ERO) positions for the facilities listed with the minimum staff ERO guidance specified in the "Alternative Guidance for Licensee Emergency Response Organizations."

The NRC staff has determined that the additional information is required for the staff to complete its review. On September 24, 2019, the NRC staff sent PSEG the draft Request for Additional Information (RAI). This RAI relates to the licensee's request to revise certain Emergency Response Organization (ERO) staffing requirements.

On October 3, 2019, the NRC staff and the licensee held a conference call to clarify the request. A publicly available version of this final RAI (attached) will be placed in the NRC's ADAMS. Subsequently, the licensee agreed to respond to this request by November 4, 2019.

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REQUEST FOR ADDITIONAL INFORMATION
RELATED TO LICENSE AMENDMENT REQUEST
FOR CHANGES TO THE RADIOLOGICAL EMERGENCY PREPAREDNESS PLAN
HOPE CREEK GENERATING STATION
AND SALEM GENERATING STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-354, 50-272 AND 50-311

By letter dated July 8, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19189A316), PSEG Nuclear LLC submitted proposed changes to the Radiological Emergency Preparedness Plan for Hope Creek Generating Station (Hope Creek) and Salem Generating Station (Salem) Unit Nos. 1 and 2 pursuant to Section 50.54(q) of Title 10 of the *Code of Federal Regulations* (10 CFR). The staff has reviewed the licensee's submittal and determined that additional information is required to enable the staff to make an independent assessment regarding its technical review.

RAI-PSEG-1

Currently, for the major functional area of Radiological Accident Assessment and Support of Operation Accident Assessment, both Hope Creek and Salem possess a Chemistry Technician to perform Chemistry/Radio-Chemistry. PSEG has proposed to remove these two on-shift positions currently filled by a Chemistry Technician at each station from this major functional area.

Section 3.1, "Functional Analysis," of Attachment 1, "Evaluation of Proposed Changes" (page 3), states, in part:

...the unaffected station Chemistry Technician "should" support the affected station Chemistry Technician and if needed, support Radiation Protection with onsite/offsite monitoring (driver)...The proposed Emergency Plan revision will clarify this support duty for the unaffected station Radiation Protection Technicians. As a result of the above, there is no longer a need for the on-shift Chemistry Technician role in the Emergency Plan.

Section 3.1 further states, "A review of the on-shift staffing analysis under 10 CFR 50, Appendix E, Section IV.A.9 was performed to ensure that the Chemistry major task is not required per the Salem or Hope Creek procedures prior to augmentation." However, analysis is limited to the Chemistry Technician with no evaluation of the impact on the Radiation Protection (RP) major functional area by the addition of the driver function to the unaffected station's RP Technicians.

- a) Please provide an analysis for the impact to the RP major functional area for this additional duty to the on-shift RP staffing. Assuming that the Shift RP Technician is performing dose assessment and the on-site (near site) survey team is dispatched to perform surveys, this analysis should describe the ability of the remaining on-shift RP Technician to perform in-plant surveys, access control, personnel monitoring, dosimetry, and RP coverage for repair and corrective actions, search and rescue, first aid, and

firefighting during emergency response operations as identified in the Radiological Emergency Preparedness Plan.

- b) Clarify whether an analysis was performed on the current on-shift staffing to identify any other potential drivers for the onsite/offsite monitoring team to minimize the impact to the RP major functional area (e.g., unaffected station's maintenance personnel).