



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

January 24, 2020

Mr. Eric Carr  
President and Chief Nuclear Officer  
PSEG Nuclear LLC - N09  
P.O. Box 236  
Hancocks Bridge, NJ 08038

SUBJECT: HOPE CREEK GENERATING STATION – AUDIT PLAN AND SETUP OF  
ONLINE REFERENCE PORTAL FOR LICENSE AMENDMENT REQUEST TO  
ADOPT 10 CFR 50.69, "RISK-INFORMED CATEGORIZATION AND  
TREATMENT OF STRUCTURES, SYSTEMS AND COMPONENTS FOR  
NUCLEAR POWER REACTORS" (EPID L-2019-LLA-0265)

Dear Mr. Carr:

By letter dated November 25, 2019 (Agencywide Documents Access and Management System Accession No. ML19330C961), PSEG Nuclear LLC (the licensee) submitted a license amendment request for the Hope Creek Generating Station (Hope Creek). The licensee proposed to modify the Hope Creek licensing basis by the addition of a license condition to allow for the implementation of the provisions of Title 10 of the *Code of Federal Regulations* Section 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors."

To improve the efficiency of the U.S. Nuclear Regulatory Commission (NRC) reviews, the licensee's representatives and the NRC staff have discussed the use of an audit using an online reference portal that would allow the NRC staff and contractors limited read-only access to the basis documents and other reference materials cited in the application. The staff plans to initially conduct an online audit to review the documentation provided on the portal. The online reference portal would allow the NRC staff to audit basis documents to determine whether the information included in the documents is necessary to reach a safety conclusion on the application. Documents identified as necessary for analysis of the application will be identified by the NRC staff. The NRC will formally request the licensee to submit those documents on the NRC docket. Use of the online reference portal is acceptable, as long as the following conditions are met:

- The online reference portal will be password-protected, and passwords will be assigned to those directly involved in the review on a need-to-know basis.
- The online reference portal will be sufficiently secure to prevent staff from printing, saving, or downloading any documents.
- Conditions of use of the online reference portal will be displayed on the login screen and will require concurrence by each user.

The NRC staff would like to request that the portal be populated with the documents listed in the enclosure to this letter. This is the initial list identified by the NRC staff. The staff may request additional documents during the review, which will be transmitted to you by e-mail. This audit will

potentially obviate the need for an onsite audit and potential requests for additional information. Please provide NRC staff access to the portal and send me the information needed to access the portal, such as user name and password, as soon as possible.

The conditions associated with the online reference portal must be maintained throughout the duration of the review process. Please provide written confirmation that PSEG Nuclear LLC agrees to the terms and conditions set forth in this letter.

Should you have any questions regarding the audit and online reference portal, please contact me at 301-415-4125 or by e-mail to [James.Kim@nrc.gov](mailto:James.Kim@nrc.gov).

Sincerely,

*/RA/*

James S. Kim, Project Manager  
Plant Licensing Branch I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-354

cc: Listserv

AUDIT PLAN  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION TO SUPPORT  
REVIEW OF LICENSE AMENDMENT REQUEST TO ADOPT 10 CFR 50.69,  
“RISK-INFORMED CATEGORIZATION AND TREATMENT OF STRUCTURES, SYSTEMS  
AND COMPONENTS FOR NUCLEAR POWER REACTORS”  
PSEG NUCLEAR LLC  
HOPE CREEK GENERATING STATION  
DOCKET NO. 50-354

1.0 BACKGROUND

By letter dated November 25, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19330C961), PSEG Nuclear LLC (the licensee) submitted a license amendment request (LAR) for the Hope Creek Generating Station (Hope Creek). The proposed amendment would modify the licensing basis of Hope Creek to allow for the implementation of the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.69, “Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors.” As stated in the LAR, the provisions of 10 CFR 50.69 allow adjustment of the scope of equipment subject to special treatment controls (e.g., quality assurance, testing, inspection, condition monitoring, assessment, and evaluation). For equipment determined to be of low safety significance, alternative treatment requirements can be implemented in accordance with this regulation. For equipment determined to be of high safety significance, requirements will not be changed or will be enhanced. This allows improved focus on equipment that has safety significance resulting in improved plant safety.

2.0 REGULATORY AUDIT BASES

A regulatory audit is a planned license or regulation-related activity that includes the examination and evaluation of primarily non-docketed information. The U.S. Nuclear Regulatory Commission (NRC) staff determined an audit to be the most efficient approach toward a timely resolution of questions associated with this LAR review since the staff will have an opportunity to minimize the potential for further rounds of requests for additional information (RAIs) and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination. The staff is requesting online access to an initial set of documentation to be reviewed at NRC headquarters. Upon completion of this online audit, the staff is expected to achieve the following:

1. Determine the need for additional documentation.
2. Develop a request for additional information, as needed.
3. Decide if a site audit is required to verify information.

Any RAIs will be issued soon after the audit with an expected response being delivered by the licensee by an agreed upon date. The information discussed in the audit to be included in the

Enclosure

development of the NRC staff's safety evaluation will be requested to be submitted on the docket.

### 3.0 REGULATORY AUDIT SCOPE OR METHOD

The online audit is being conducted to gain a better understanding of the submittal and to assess whether a site audit is required to verify information. The area of focus for the regulatory audit is the information requested by the NRC staff in Section 4.0 of this audit plan. The staff will review the documentation and generate any RAIs necessary to complete the review.

### 4.0 INFORMATION NECESSARY FOR THE REGULATORY AUDIT

The following information is requested by the NRC staff for the online audit through the reference portal:

- uncertainty notebooks for the Hope Creek internal events, internal flooding, and fire probabilistic risk assessments (PRAs);
- documentation on evaluation of the generic and plant-specific uncertainties with respect to the LAR;
- reports of peer reviews (full-scope and focused-scope), self-assessments, and Facts & Observations (F&Os) closure reviews for the internal events, internal flooding, and fire PRAs cited in the LAR;
- PRA notebooks for the modeling of FLEX equipment and FLEX human error probabilities;
- any other supporting documentation that the licensee may determine is responsive to the staff's above information requests;
- results of the fire PRA and resolution of F&Os; and
- seismic screening notebook using the Electric Power Research Institute Report No. 3002012988 methodology.

The licensee will be informed by e-mail if there is a need for additional supporting documentation.

### 5.0 TEAM ASSIGNMENTS

The audit will be conducted by NRC staff from the Office of Nuclear Reactor Regulation (NRR), Division of Risk Assessment (DRA), Probabilistic Risk Assessment Licensing Branches A and C (APLA and APLC), and NRC contractors from Pacific Northwest National Laboratories (PNNL). Licensee personnel familiar with the requested information should be made available on a mutually agreeable schedule to respond to any questions from the NRC audit team.

Members of the NRC audit team are noted below:

- James Kim (project manager), NRR/Division of Operating Reactor Licensing/LPL-1
- Todd Hilsmeier (technical reviewer), NRR/DRA/APLA
- Jeff Circle (technical reviewer), NRR/DRA/APLA
- Earl Bousquet (technical reviewer), NRR/DRA/APLC
- De (Wesley) Wu (technical reviewer), NRR/DRA/APLC
- Mark Wilk (NRC contractor), PNNL
- Steve Short (NRC contractor), PNNL

## 6.0 LOGISTICS

The audit will be started once an electronic portal is set up and the documentation is made available to the NRC audit team. The online audit will be conducted over a few weeks, consistent with the internal review schedule for the issuance of the RAIs. The licensee will be kept informed on a regular basis during biweekly discussions with the project manager regarding the progress.

## 7.0 DELIVERABLES

The NRC audit team will develop an audit summary report to convey the results. The report will be placed in ADAMS within 30 working days of the completion of the final audit session. The NRC will also finalize the RAIs after completion of the audit and issue them to the licensee.

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DATED JANUARY 24, 2020

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THilsmeier, NRR

EBousquet, NRR

JCircle, NRR

EBousquet, NRR

DWu, NRR

**ADAMS Accession No.: ML20023A994**

\*by e-mail

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DRA/APLA/BC*
NAME	JKim	LRonewicz	RPascarelli
DATE	01/23/2020	01/23/2020	01/23/2020
OFFICE	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM	
NAME	JDanna	JKim	
DATE	01/24/2020	01/24/2020	

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