

Salem Generating Stations, Unit 1 and 2, and Hope Creek Generating Station

Facility Operating License Nos. DPR-70, DPR-75 and NPF-57

NRC Docket Nos. 50-272, 50-311 and 50-354

July 21, 2020

LR-N20-0049

To: James Kim, NRC Licensing Project Manager
Document Control Desk

CC: Justin Hawkins, Salem Senior Resident Inspector, Jigar Patel, Hope Creek NRC Senior Resident Inspector; Brice Bickett, Div. Reactor Projects Branch Chief,

Reference: NRC Letter from H. Nieh and J. Lubinski to NEI, "U.S. Nuclear Regulatory Commission Planned Actions Related to the Requirements for Part 73, Appendix B, Section VI During the Coronavirus Disease 2019 Public Health Emergency," April 20, 2020 (ADAMS Accession Number ML20105A483).

As a result of the Coronavirus Disease 2019 (COVID-19) public health emergency (PHE) PSEG Nuclear LLC (PSEG) expects that it will no longer be able to comply with the requirements of the specific subsections of 10 CFR Part 73, Appendix B, Section VI listed in the table below and will implement site specific COVID-19 PHE training requalification controls consistent with those outlined in the Reference letter and its enclosures. These controls are documented in the table.

PSEG requests a temporary exemption from the identified security training requalification requirements listed in the table. Granting of the requested exemption will allow deviation from the associated items in the PSEG Security Training and Qualification Plan. This temporary exemption supports the isolation restrictions (e.g., social distancing, group size limitations, self-quarantining, etc.) necessary to protect required site personnel in response to the 2020 COVID-19 virus. These restrictions are needed to ensure personnel are isolated from the COVID-19 virus and remain capable of maintaining plant security. PSEG implemented isolation restrictions for site personnel on March 25, 2020.

This exemption is specific to security personnel who have previously demonstrated proficiency and are currently qualified in accordance with 10 CFR Part 73, Appendix B, Section VI, "Nuclear Power Reactor Training and Qualification Plan for Personnel Performing Security Program Duties." Additionally, because of the rigorous nature of PSEG's nuclear security personnel training programs, which consist of regularly scheduled training activities to include weapons training, contingency response drills and exercises, and demonstrated acceptable performance of day-to-day job activities (e.g., detection and assessment, patrols, searches, and defensive operations), it is reasonable to conclude that security personnel will continue to maintain their proficiency even though the requalification periodicity is temporarily exceeded.

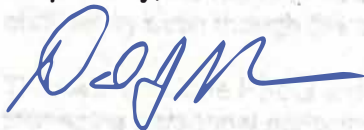
The date and time PSEG will begin implementing its site-specific COVID-19 PHE controls for managing personnel performing Security Program duties is indicated in the table.

10 CFR 73 Appendix B Section VI	Controls	Begin Implementation
<p>Subsection C.3.(I)(1) Annual force-on-force (FOF) exercises</p>	<p>PSEG will maintain a list of the names of the individuals who will not meet the requalification requirements and will include the dates of the last annual FOF exercise.</p> <p>and</p> <p>will ensure contingency response readiness of security personnel not participating in annual FOF exercise by continuing conduct of quarterly tactical response drills which include:</p> <ul style="list-style-type: none"> • a table top exercise, and • a walkdown of previous exercise route of travel <p>and</p> <p>will complete the FOF exercise, within the time period in this request, when isolation restrictions are ended.</p>	<p>PSEG will begin implementing COVID-19 PHE controls for managing personnel performing Security Program duties at 00:01 on 08/07/2020.</p>

The time period during which the exemptions are required is not currently known, but the exemption will be in effect until 90 days after the PHE is ended or until December 31, 2020, whichever occurs first. Near the end of the exemption period, if more time is needed, an additional email supplement request may be submitted to extend the exemption period.

PSEG requests a written confirmation of this request.

Respectfully,



David Mannai
Senior Director Regulatory Affairs and Nuclear Oversight
PSEG Nuclear LLC