

March 30, 2000

MEMORANDUM FOR: Docket File

FROM: Jack N. Donohew, Project Manager for Callaway **/RA/**
Project Directorate IV-2
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: CONFERENCE CALL WITH PUBLIC SERVICE ELECTRIC &
GAS COMPANY TO ANSWER CLARIFYING QUESTIONS ON
ITS APPLICATION FOR RETS RELOCATION FROM THE
TECHNICAL SPECIFICATIONS FOR SALEM GENERATING
STATION UNITS 1 AND 2 (TAC NOS. MA8060 AND MA8061)

On March 15, 2000, there was a conference call with Public Service Electric & Gas Company (PSE&GC) on its application of January 24, 2000, (LR-N990402, LCR S99-19) for the relocation of the radiological effluent technical specifications (RETS) from the plant Technical Specifications (TSs) to the offsite dose calculation manual (ODCM) and process control program (PCP). The relocation is in accordance with Generic Letter (GL) 99-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (RETS) in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or the Process Control Program," dated January 31, 1989.

Enclosed are the 21 clarifying questions for the Salem 1/2 application. The licensee's response to each question is given below the question. The persons representing the Nuclear Regulatory Commission were Robert Fretz (Salem Project Manager) and Jack Donohew (reviewer). The persons representing the licensee were Brook Knieriem and Vince Ciarlante.

For the licensee's responses that change the application, the licensee will submit the information by letter, and it is stated in the response that a letter will be submitted. For the other responses, at the request of the PDI-2 section chief, the information the staff relies upon in making its determinations will be contained in either correspondence docketed by the licensee or in documents such as the plant Technical Specifications or Final Safety Analysis Report.

Docket Nos. 50-272 and 50-311

Enclosure: Questions for Salem 1/2 Application

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Enclosure: Clarifying Questions for Salem 1/2 Application

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CLARIFYING QUESTIONS FOR SALEM 1/2 APPLICATION
FOR RELOCATION OF RETS TO ODCM/PCP

1. May I have a copy of the PCP that clearly shows the changes from the relocation of requirements from the Salem 1/2 Technical Specifications (TSs)? [Only pages showing what has changed because of the implementation of GL 89-01 are needed.]

Response: The PCP will be revised after the amendment relocating the RETS from the TSs to the ODCM and PCP is approved. The changes to the PCP will be made during the implementation of the approved amendment. The licensee will state this in a future letter that will supplement its application of January 24, 2000.

2. In what amendments (and dates) were the ODCM and PCP added to the TSs?

Response: For the ODCM, the amendments are 59 (Unit 1) and 28 (Unit 2). For the PCP, the amendments are 139 (Unit 1) and 117 (Unit 2). [The amendment dates are the following: 59/28 (Units 1/2) is December 5, 1984 and 139/117 is January 5, 1993.]

3. In your application of January 24, 2000, there is a discussion on the staff's letter of June 30, 1993, and the "new" Part 20. Explain what you are intending by restating a paragraph from the NRC's letter about "retaining their existing level of effluent control as implementing the ALARA requirements after January 1, 1994, without submitting individual requests for amending their technical specifications to comply with new 10 CFR 20.1101(b)." What does this mean and what are you asking the staff to do or not do. Are the current TSs in conflict with 10 CFR 20.1101(b)?

Response: The safety evaluation for Hope Creek Amendment No. 121 dated September 8, 1999, addresses the same request concerning the "new" 10 CFR Part 20. [The following is from the review of the Hope Creek amendment: Section 3.4 of the safety evaluation for the amendment provides the explanation about Salem 1/2's request about the "new" Part 20. Part 20 was revised and became effective January 1, 1994. This is the "new" Part 20. The NRC staff in the Thomas Murley letter June 30, 1993, allowed the nuclear power plant licensees to defer changing their plant Technical Specifications to conform to the "new" Part 20 until the Technical Specifications are changed. This is addressed in the Hope Creek amendment.]

4. The chemical waste basin line is in Tables 3.3-12 and 4.3-12 for only Unit 2. Should not the ODCM have "(Unit 2)" added to these tables in the ODCM to show that line applies only to Unit 2 or are you applying the requirements in these tables to that same line in Unit 1 also?

Response: A reference to Unit 2 for this line should not be added to the ODCM because the line is common to both units. This fact should be stated in the future letter.

5. For notes (2).3 and (2).4 in ODCM Table 4.3-12, “{Unit 1}” should be listed and not “{Unit 2}.” These notes are only in the Unit 1 TSs.

Response: The staff comment is correct, and the licensee will make the correction in the ODCM after the amendment is approved, in the same manner as for the changes to the PCP in the response to question 1. The licensee will state this in its future letter.

6. For ODCM Table 4.3-12, where does the second note # (“The 2R18 channel is an off-line which ... a CHANNEL CHECK for compliance purposes.) come from? The first note # comes from TS Tables 4.3-12 for the two units.

Response: The reference to “2R18 channel” means the R18 channel for Unit 2. This note is in the Unit 2 TSs. However, the notes for both units should be to the source check, and not to the channel check. The licensee will make the correction in the ODCM after the amendment is approved, in the same manner as for the changes to the PCP in the response to question 1.

7. In proposed Specification 6.8.4.g.6 for the radioactive effluent controls program, the words you proposed came from GL 89-01 except for the reference to a 92-day period and exceeding a suitable fraction instead of GL’s words of a 31-day period and exceeding 2 percent. Explain why did you proposed these different requirements?

Response: The 92-day period and exceeding a suitable fraction are in the current TSs and Bases to the TSs.

8. Are there any specifications in the TSs on gas storage tanks?

Response: There are no specifications on gas storage tanks in the TSs.

9. In the proposed change to Specification 6.13.2 on the PCP, why are you listing regulations that the PCP must meet instead of stating the words in the GL that refer to the “existing requirements to federal, state, or other applicable regulations.” We request that you use the words in the GL and revise your proposal for this specification.

Response: The licensee will change the wording for the PCP to be the same wording that is in GL 89-01, and will submit a new page for the TSs in its future letter.

10. Controls 3.12.1 refers to Specification 6.8.4.g.h.1. The “g” in the specification being referenced is incorrect and should not be listed.

Response: The letter “g” will be removed in a correction to the ODCM after the amendment has been approved. This will be done in the implementation of the amendment. See the response to question 1.

11. In ODCM Table 3.12-1 for direct radiation, the frequency of sampling and collection and the frequency of analysis was changed from “Monthly, Quarterly, or Semi-annually” to “Quarterly.” Explain why this change is being made.

Response: The licensee wants to have the ODCM Table 3.12-1, on the radiological environmental monitoring program, for Salem 1/2 to be the same as the ODCM table for Hope Creek. The licensee stated it operates the adjoining sites and wants to have the same Table 3.12-1 in the ODCMs for both the sites. The licensee will state this in its future letter.

12. In ODCM Table 3.12-1 for surface, ground, and drinking water, the quantity of the sample given in the TS Table 3.12-1 (under the column for sampling and collection frequency) is not being relocated to the ODCM table. Explain why this change is being made.

Response: Same as the response to question 11.

13. In ODCM Table 3.12-1 for direct radiation, why is the outer ring of stations being change from the 2- to 8-km range in the TS Table 3.12-1 to the 6- to 8-km range in the ODCM table?

Response: Same as the response to question 11.

14. Why were notes (c) for airborne radioiodine and particulates and (f) for background locations in TS Table 3.12-1 not relocated to ODCM Table 3.12-1? These notes should be added to the ODCM table. Note (f) could be attached to the background locations listed in the ODCM table.

Response: Same as response to question 11.

15. Where in ODCM Table 3.12-1 does note (6) apply?

Response: The note applies to drinking water.

16. Explain the similarity of the equations in the ODCM for calculating doses with the equations in Regulatory Guide 1.109, Revision 1, dated October 1977.

Response: The Bases to the RETS in the TSs explain that the equations in the ODCM for calculating doses are the equations in Regulatory Guide 1.109, Revision 1, dated October 1977.

17. See question 9 above. In the proposed words for changes to the PCP for Specification 6.13.2, you have used the same text in the GL for changes to the ODCM for the text to address changes to the PCP. You need to use the GL text for a.2) for changes to the PCP. The

reference to 20.106, 40 CFR Part 190, 50.36a, and Appendix I to Part 50 apply to the ODCM not the PCP. I request that you propose the following words from the GL: 6.13.2.1.b) A determination that the change will maintain the overall conformance of the solidification waste product to existing requirements of federal, State, or other applicable regulations.

Response: The licensee will change the wording for the PCP to be the same wording that is in GL 89-01, and will submit a new page for the TSs in its future letter.

18. For changes to the Bases for Specification 3/4.3.3.9 of the TSs, the markup for Unit 1 shows text being deleted in the paragraph whereas the markup for Unit 2 does not show the same text being deleted. Why is this?

Response: The markup for the Bases for Unit 2 should have had the same deletions as provided for Unit 1. A corrected page will be submitted with the corrections for questions 9 and 17.

19. Have the Controls and SRs in the ODCM and PCP been incorporating into unit 1/2 operating procedures?

Response: They have not. They will be incorporated during the implementation of the amendment after it has been approved. The licensee will state this in its future letter.

20. In the Bases for 3/4.11.4, Total Dose, the first sentence for the TS Bases refers to 10 CFR Part 10 and the proposed ODCM Bases refers to 10 CFR Part 20. Which is correct?

Response: The ODCM page is correct because the reference to 10 CFR Part 10 was incorrect. The error was corrected in making the ODCM page.

21. There are a few changes (only affecting 5 pages) to the ODCM in Revision 13 in the calculational methodologies, Part II, of the ODCM. For example, equation 1.2 on page 76 of 157 of the ODCM. Are any of the changes in the calculational methodologies associated with the relocation of the RETS to the ODCM? And if so, what is the change (including page number) and its relationship to the relocation?

Response: There are no changes to the ODCM equations because of the relocation of RETS procedural details to the ODCM. The explanation of changes to these 5 pages is given on page 3 of 157 of the ODCM where revisions to Part II, "Calculational Methodologies," of the ODCM are listed.