

ArevaEPRDCPEm Resource

From: WELLS Russell D (AREVA NP INC) [Russell.Wells@areva.com]
Sent: Tuesday, March 31, 2009 6:08 PM
To: Getachew Tesfaye
Cc: Pederson Ronda M (AREVA NP INC); BENNETT Kathy A (OFR) (AREVA NP INC); DELANO Karen V (AREVA NP INC)
Subject: Response to U.S. EPR Design Certification Application RAI No. 192, FSAR Ch 12
Attachments: RAI 192 Response US EPR DC.pdf

Getachew,

Attached please find AREVA NP Inc.'s response to the subject request for additional information (RAI). The attached file, "RAI 192 Response US EPR DC.pdf" provides a technically correct and complete response to question 12.05-1.

Appended to this file are affected pages of the U.S. EPR Final Safety Analysis Report in redline-strikeout format which support the response to RAI Question 12.05-1.

The following table indicates the respective pages in the response document, "RAI 192 Response US EPR DC.pdf" that contain AREVA NP's response to the subject questions.

Question #	Start Page	End Page
RAI 12.05 - 1	2	2

This concludes the formal AREVA NP response to RAI 192, and there are no questions from this RAI for which AREVA NP has not provided responses.

Sincerely,

(Russ Wells on behalf of)

Ronda Pederson

ronda.pederson@areva.com

Licensing Manager, U.S. EPR Design Certification

New Plants Deployment

AREVA NP, Inc.

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From: Getachew Tesfaye [mailto:Getachew.Tesfaye@nrc.gov]
Sent: Wednesday, March 04, 2009 7:39 PM
To: ZZ-DL-A-USEPR-DL
Cc: Sara Bernal; Timothy Frye; Surinder Arora; Joseph Colaccino; ArevaEPRDCPEm Resource
Subject: U.S. EPR Design Certification Application RAI No. 192 (2231), FSARCh. 12

Attached please find the subject requests for additional information (RAI). A draft of the RAI was provided to you on February 23, 2009, and on March 3, 2009, you informed us that the RAI is clear and no further clarification is needed. As a result, no change is made to the draft RAI. The schedule we have established for review of your application assumes technically correct and complete responses within 30 days of receipt of RAIs. For any RAIs that cannot be answered within 30 days, it is expected that a date for receipt of this

information will be provided to the staff within the 30 day period so that the staff can assess how this information will impact the published schedule.

Thanks,
Getachew Tesfaye
Sr. Project Manager
NRO/DNRL/NARP
(301) 415-3361

Hearing Identifier: AREVA_EPR_DC_RAIs
Email Number: 359

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Subject: Response to U.S. EPR Design Certification Application RAI No. 192, FSAR Ch 12
Sent Date: 3/31/2009 6:08:27 PM
Received Date: 3/31/2009 6:08:30 PM
From: WELLS Russell D (AREVA NP INC)

Created By: Russell.Wells@areva.com

Recipients:

"Pederson Ronda M (AREVA NP INC)" <Ronda.Pederson@areva.com>

Tracking Status: None

"BENNETT Kathy A (OFR) (AREVA NP INC)" <Kathy.Bennett@areva.com>

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"DELANO Karen V (AREVA NP INC)" <Karen.Delano@areva.com>

Tracking Status: None

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Tracking Status: None

Post Office: AUSLYNCMX02.adom.ad.corp

Files	Size	Date & Time
MESSAGE	2321	3/31/2009 6:08:30 PM
RAI 192 Response US EPR DC.pdf		141138

Options

Priority: Standard

Return Notification: No

Reply Requested: No

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Expiration Date:

Recipients Received:

Response to

Request for Additional Information No. 192

03/04/2009

U. S. EPR Standard Design Certification

AREVA NP Inc.

Docket No. 52-020

SRP Section: 12.05 - Operational Radiation Protection Program

Application Section: Section 12.5, Operational Radiation Protection Program

QUESTIONS for Health Physics Branch (CHPB)

Question 12.05-1:

COL Information Item 12.05-1, Operational Radiation Protection Program, references several Regulatory Guides (RGs) which are outdated according to the consolidated guidance of NUREG 1736. In addition, the reference to Part 72 in this item is incorrect. Please revise COL item 12.05-1 so that the Part 72 reference is changed to Part 71, RGs 8.20, 8.26, and 8.32 are deleted from the listing of RGs, and RG 1.206 is added.

Response to Question 12.05-1:

The references to outdated Regulatory Guides 8.20, 8.26, and 8.32 will be removed from U.S. EPR FSAR, Tier 2, Table 1.8-2, ("U.S. EPR Combined License Information Items") Item 12.5-1, and from U.S. EPR FSAR, Tier 2, Section 12.5 ("Operational Radiation Protection Program"). These deletions will make these items consistent with NEI 07-03, Revision 7, "Generic FSAR Template Guidance for Radiation Protection Program Description (November 2008)."

In addition, the above two locations in the U.S. EPR FSAR have references to 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste." This reference is inappropriate because 10 CFR Part 72 licensing requirements are not within the scope of the operational radiation protection program. Accordingly, this reference will be changed in both locations to 10 CFR Part 71, "Packaging and Transportation of Radioactive Material," which is within the scope of the operational radiation protection program.

Regulatory Guide 1.206 will be added to the list of Regulatory Guides referenced in the above two locations in the U.S. EPR FSAR.

FSAR Impact:

U.S. EPR FSAR, Tier 2, Table 1.8-2 and Section 12.5 will be revised as described in the response and indicated on the enclosed markup.

U.S. EPR Final Safety Analysis Report Markups

**Table 1.8-2—U.S. EPR Combined License Information Items
Sheet 35 of 44**

Item No.	Description	Section	Action Required by COL Applicant	Action Required by COL Holder
12.3-3	A COL applicant that references the U.S. EPR design certification will describe the use of portable instruments, and the associated training and procedures, to accurately determine the airborne iodine concentration within the facility where plant personnel may be present during an accident, in accordance with requirements of 10 CFR 50.34(f)(2)(xxvii) and the criteria in Item III.D.3.3 of NUREG-0737. The procedures for locating suspected high-activity areas will be described.	12.3.4.5	Y	
12.5-1	A COL applicant that references the U.S. EPR design certification will fully describe, at the functional level, elements of the Radiation Protection Program. The purpose of the Radiation Protection Program is to maintain occupational and public doses ALARA. The program description will identify how the program is developed, documented, and implemented through plant procedures that address quality requirements commensurate with the scope and extent of licensed activities. This program will comply with the provisions of 10 CFR Parts 19, 20, 50, 52, and 72.71 and be consistent with the guidance in RGs <u>1.206</u> , 1.8, 8.2, 8.4, 8.5, 8.6, 8.8, 8.9, 8.10, 8.19, 8.15, 8.20, 8.26, 8.27, 8.28, 8.29, 8.32 , 8.35, 8.36, 8.38, and the consolidated guidance in NUREG-1736.	12.5	Y	
13.1-1	A COL applicant that references the U.S. EPR design certification will provide site-specific information for management, technical support, and operating organizations.	13.1	Y	
13.2-1	A COL applicant that references the U.S. EPR design certification will provide site-specific information for training programs for plant personnel.	13.2	Y	
13.3-1	A COL applicant that references the U.S. EPR design certification will provide a site-specific emergency plan in accordance with 10 CFR 50.47 and 10 CFR 50 Appendix E.	13.3	Y	

12.5 Operational Radiation Protection Program

A COL applicant that references the U.S. EPR design certification will fully describe, at the functional level, elements of the Radiation Protection Program. The purpose of this Radiation Protection Program is to maintain occupational and public doses ALARA. The program description will identify how the program is developed, documented, and implemented through plant procedures that address quality requirements commensurate with the scope and extent of licensed activities. This program will comply with the provisions of 10 CFR Parts 19, 20, 50, 52, and ~~72~~71 and be consistent with the guidance in RGs ~~1.206~~, RG 1.8, RG 8.2, RG 8.4, RG 8.5, RG 8.6, RG 8.8, RG 8.9, RG 8.10, RG 8.13, RG 8.15, ~~8:20~~, ~~8:26~~, RG 8.27, RG 8.28, RG 8.29, ~~8:32~~, RG 8.34, RG 8.35, RG 8.36, RG 8.38, and the consolidated guidance in NUREG-1736 (Reference 1).

12.5.1 References

1. NUREG-1736, "Consolidated Guidance: 10 CFR Part 20—Standards for Protection Against Radiation," U.S. Nuclear Regulatory Commission~~NRC~~, October 2001.