

From: Nanette Gilles
To: Eddie Grant; Tom Mundy
Date: 7/22/04 3:12PM
Subject: DRAFT REQUEST FOR ADDITIONAL INFORMATION

Please find attached a draft request for additional information (RAI) for the Clinton ESP review. This question pertains to the staff's review in the area of emergency planning (this is the formerly "missing" RAI 13.3-12). Exelon may request a phone call to seek clarification on the question before it is issued by letter. Please contact me to let me know if you wish to arrange such a call or if you have other questions.

Sincerely,

Nanette Gilles
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U.S. Nuclear Regulatory Commission
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CC: Michael Scott; Raj Anand; Robert Moody

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Subject: DRAFT REQUEST FOR ADDITIONAL INFORMATION
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From: Nanette Gilles
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eddie.grant (Eddie Grant)		
thomas.mundy (Tom Mundy)		

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DRAFT
Exelon Early Site Permit Application
SSAR Section 2.2, Nearby Industrial, Transportation, and Military Facilities
Requests for Additional Information

SSAR Section 2.2.2, Descriptions

RAI 2.2.2-1

In reference to Section 2.2.2.5.3, describe the types of aircraft and provide estimates of the annual number of operations for the three private airstrips within 6 miles of the proposed ESP site.

RAI 2.2.2-2

In reference to Section 2.2.2.5.3, clarify the statement "... ESP safety related facilities would have to be sighted within a footprint of 386,000 ft² in order to meet the 1.0E-07 impact probability criterion. This area is **less** than the effective impact area computed for Clinton, which ranges from 235,000 ft² to 192,000 ft²." The use of the word "**less**" appears to be incorrect.

RAI 2.2.2-3

In reference to Section 2.2.2.5.3, clarify what is meant by "separation distance" in the phrase "... do not fully credit the separation distance of 4 of the 5 runways resulting in the tabulated probabilities being conservative." Also, describe how this separation distance relates to the probabilities provided in CPS USAR Table 3.5-7.

RAI 2.2.2-4

In reference to Section 2.2.2.6, clarify the apparent inconsistency in the statement "While DeWitt County's Comprehensive Plan identifies **industrial growth, including a public airport**, as intermediate term objectives, **there are no pending new industries or expansion of existing industries** in the vicinity of the EGC ESP Site." Also, clarify what is considered the 'vicinity' of the EGC ESP Site.

SSAR Section 2.2.3, Evaluation of Potential Accidents

RAI 2.2.3-1

In reference to Sections 2.2.3 and 2.2.3.1.1, transportation accidents on State Route 54 passing about 1 mile from the EGC ESP Facility are described as not needing to be considered as design basis events for the CPS. This conclusion is described as also being valid for the EGC ESP Facility on the basis of similar **proximity** and traffic **volumes**. It is not clear as to how each of these hazard attributes is being used in the EGC ESP site hazard evaluation. Provide clarification with respect to these hazard attributes.

If transportation accidents are dismissed from consideration in the ESP application on the basis of **proximity**, then overpressure and toxic gas hazards need to be addressed in terms of facility design (or applicable PPE values). If, however, dismissal is based on traffic **volume**, this needs to be indicated explicitly.

For example, in Section 2.2.3.1.1, overpressure is judged to not require specific design considerations on the basis of the separation distance being similar or greater than that for the

CPS. Separation distance provides a basis for estimating the overpressure, but does not address the capacity of a facility to withstand its effects. Hence, consideration of structural design capacity for withstanding a given overpressure is needed to support the conclusion that an overpressure accident need not be considered as a design basis event.

Similarly, in Section 2.2.3.1.3, conclusions of “no adverse effects” regarding postulated toxic gas hazards for the CPS are judged to apply to the EGC ESP Facility, primarily on the basis of similar separation distances. Describe the extent to which plant features (e.g., control room habitability system design) may be required in order to support the “no adverse effect” conclusion for the EGC ESP Facility.