

May 17, 2005

MEMORANDUM TO: Cathy Haney, Program Director
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

FROM: Joseph L. Birmingham, Project Manager */RA/*
Policy and Rulemaking Program
Division of Regulatory Improvement Programs, NRR

SUBJECT: SUMMARY OF MAY 5, 2005 PUBLIC MEETING ON RADIATION
PROTECTION ISSUES TO BE ADDRESSED WHEN APPLYING FOR A
COMBINED OPERATING LICENSE UNDER 10 CFR PART 52

On May 5, 2005, Nuclear Regulatory Commission (NRC) staff met with a representative of the Nuclear Energy Institute (NEI) and industry in a public meeting at NRC headquarters in Rockville, Maryland, to continue discussion of radiation protection issues that an applicant would need to address when applying for a Combined Operating License (COL) under 10 CFR Part 52. Attachment 1 is a list of meeting attendees. Attachment 2 is an NRC handout for discussion of radiation surveys, sampling, and monitoring that should be included in a COL application.

After introductions, the group discussed the agenda for the meeting scheduled May 26, 2005, in conference room 4 at NEI headquarters. The group agreed to modify the agenda to allow treatment of high radiation barriers under the reactor oversight process to be discussed approximately from 9:00 - 10:30 a.m. A revised meeting notice will be issued with the change.

Ralph Andersen, of NEI, discussed a path forward for writing the guidance for the radiation protection portion of an COL application (COLA). Mr. Andersen proposed that he provide an early draft of the guidance to the staff for comment the week of May 9, 2005. After staff feedback on the early draft, he would provide a complete draft May 23 for discussion at the meeting on May 26. He then noted that draft NUREG 0761 could provide a good basis for developing the COLA guidance. Roger Pedersen, of the NRC, said he agreed that the NUREG covered most of the issues that should be addressed in the guidance but the NUREG was not organized in the same format as the NRC Standard Review Plan (SRP) and, in the interest of efficiency, it would be good if the issues and discussion in NUREG-0761 could be organized in a similar order as in the SRP. Mr. Andersen agreed that it would be a good approach to have the guidance parallel the format of the SRP.

The group continued the discussion from their previous meeting on the appropriate level of detail that should be in the COLA guidance. As an example of the appropriate level of detail, the group generally agreed that the guidance should describe the typical activities that would be performed under a radiation protection section rather than give an example of an activity that would be performed under that section. The group further agreed that it was not necessary to identify in an application specific details such as the number or type of instruments that would be used for an activity but the application should commit to have a sufficient number of instrumentation to carry out the regulatory required function. This approach was considered

appropriate because technology could change and render specific numbers or types of instruments inappropriate. Further, individual applicants would vary in their approaches for implementing the activities and therefore the details would vary.

Industry revisited the objectives for the guidance and suggested that, in addition to minimizing the need for additional requests for information, the guidance should be developed to provide a model that would require a minimum of long-term maintenance. The group agreed this was appropriate and that it fit with the approach of an application committing to provide sufficient procedures, training, equipment, etc. for specific regulatory requirements without detailing numbers or types unless necessary to met the requirement.

The group noted that the detail of a final safety analysis report (FSAR) for a COLA should be more descriptive than the safety analysis report for a construction permit but should not be expected to contain the same level of detail as a finished plant. Further, a provision would be needed to provide scheduling as to when certain commitments would be in place. The example used by NEI was that certain aspects of the radiation protection program would need to be in place before sources or other radiological material were brought on site but other aspects of the program must be in place prior to fuel being on site.

The group discussed that when NEI 04-01 stated "in accordance with regulatory guide x.xx", it would be appropriate not to identify the regulatory guide by revision and date. However, the COLA should identify the applicable revision and date. This approach would allow for future revisions to regulatory guides not to affect the guidance.

The NRC provided a list (Attachment 2) of radiation surveys, sampling, and monitoring that would be expected to be in a standard review plan and discussed how NEI 04-01 could better the review process by addressing the information in its guidance. The group discussed the information on the list as being appropriate to be addressed in the guidance.

Having completed the discussion of the agenda, the meeting was adjourned.

Project No. 689

Attachments: As stated

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Distribution: Summary of Mtg. w/NEI regarding RP COL applications 5/5/05

ADAMS/PUBLIC OGC ACRS

Email

BBoger	DMatthews/FGillespie	CHaney	EMcKenna	SKlementowicz
RPedersen	CHinson TQuay	RNimitz, R-I	GKuzo, R-II	RAlexander, R-III
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Nuclear Energy Institute

Project No. 689

Accession: # ML051310137

OFFICE	RPRP	IEPB	RPRP
NAME	JBirmingham	RPedersen	EMcKenna
DATE	05/11/2005	05/16/2005	05/17/2005

OFFICIAL RECORD COPY

**List of Attendees for May 5, 2005
Meeting on Radiation COL Issues**

Name	Organization
Roger Pedersen	NRC\DIPM\IPSB
Charles Hinson	NRC\DIPM\IPSB
Joe Birmingham	NRC\DRIP\RPRP
Ralph Andersen	Nuclear Energy Institute
Richard Getz*	Framatome ANP
Jenny Weil*	McGraw Hill

* via telecon

Draft for Discussion
SRP
RADIATION SURVEYS, SAMPLING, AND MONITORING

PART 20 SUBPART F [12.5]*

- Survey equipment, staffing, training, procedures
- Monitoring 1) external: equipment, issuance (facilities, frequency, etc), NVLAP;
2) internal: equipment, facilities, frequency
- Types, sensitivities, LLDs, calibrations, sufficient quantities, etc.

Part 50 GDC 64

	Normal Ops.	AOOs	Accidents
Containment	RG 1.97 [12.5]	RG 1.97 [12.5]	RG 1.97 [12.5]
Spaces <u>w</u> LOCA	RG 1.97 [12.5]	RG 1.97 [12.5]	RG 1.97 [12.5]
Effluent Pathways	RETS/REMP [11.5]	RETS/REMP [11.5]	RG 1.97 [11.5]
Plant Environs	RETS/REMP [11.5]	RETS/REMP [11.5]	NUREG 0654 [13.3]

Part 50.34 (f)

(xvii) (II.F.1) & (xix) (II.F.3) - overlap with RG 1.97 [12.5 & 11.5]

(xxvii) (III.D.3) - [12.5] capability of onsite sampling and analysis of airborne radio iodine during accidents.

(viii) (II.B.3) - [9.3.2] capability to sample coolant and containment atmosphere.

* [] indicate SRP section