

# Comments/Suggestions Regarding NEI 04-01

Chapter/ Section #	Tracking #	NRC Action	Page #	Proposed Change
C	C-1	S		Section 5, last paragraph: Add "the emergency planning program" to the last sentence, which lists the existing programs.
D	D-1	C		Emergency plans addressed in the COL [combined license] template. NEI should review re-proposed Part 52 language.
1.1	1.1-1	C	1	Last paragraph: Regarding the statement "The COL process has not been utilized, however, the industry recognizes it as a key to deployment of new nuclear plants in the U.S., and to achieving the Part 52 goal of a more stable, predictable and efficient licensing process:" While the goal of creating Part 52 may have included the need for stability, predictability, and efficiency, Part 52 does not mention these within its text. As stated, these are not "Part 52 goals."
D	D-2	S	1	Paragraph 5: The staff proposed that a COL applicant should adopt a standard fire protection license condition similar to what is currently incorporated in operating power reactor approved licenses. Generic Letter 86-10 provides standard fire protection license condition wording.
2.3	2.3-2	S	4	The term "COL Information Items (COL Items)" should be changed to "COL Action Items" to be consistent with the term defined in Appendix A to 10 CFR Part 52.
2.3	2.3-3	S	6	The following definition should be added to the list of definitions and terms provided in this section:  Permit Conditions: The inclusion of limitations and conditions in an Early Site Permit as authorized in 10 CFR § 52.24.
4.3.4	4.3.4-3	S	6	The following definition should be added to the list of definitions and terms provided in Section 2:  Plant Parameter Envelope (PPE): A set of design parameters listed in the Early Site Permit [ESP] that are expected to bound the characteristics of a reactor that might later be deployed at the ESP site.
3	3.0-3	S	9	Include a public meeting and LWA-1 site prep in first 18-24 months. The public meeting is to discuss the proposed submittal of a COL application [COLA] and site prep may be done prior to COLA submittal.

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4.1.1	4.1-1	C	11	Table 4.1-1 (Roadmap to Guidance for COLA Requirements), the second column entry for DCR.IV.A.2.f should read "Other information required by 52.47(a) (e.g., USIs/GSIs)," instead of "50.47."
4.1.3	4.1.3-1	C	13	Figure 4-1: Box stating that the "Part 50 change & updated processes govern" for Emergency Plans. NEI should review re-proposed Part 52 language.
4.3.4	4.3.4-4	S	25	This section should also discuss that COL applicants that refer to an ESP must also address any and all of the COL Action Items identified in the ESP.
4.3.5	4.3.5-1	C	27	Paragraph 7: Replace AP600 with AP1000 (For example, Section 9.5.1.3 and Appendix 9A of the AP600 generic DCD present the Fire Protection)
4.3.5	4.3.5-2	S	27	Paragraph 7: If the plant-specific departures from the approved design is a modification from the COL, the applicant should submit those changes to NRC for review. (For example, Section 9.5.1.3 and Appendix 9A of the AP600 generic DCD present the Fire Protection. This information would be incorporated by reference in a plant-specific DCD portion of the FSAR [final safety analyses report] and would not be subject to further NRC review or public hearing.)
4.3.5	4.3.5-3	C	27	Paragraph 8: Replace AP600 with AP1000 (For example, a COL applicant would be expected to supplement Appendix 9A, Fire Protection Analysis, of the AP600 generic DCD)
4.3.8	4.3.8-1	C	29	Address consideration of unresolved new or additional emergency preparedness information. NEI should review re-proposed Part 52 language.

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4.3.9.1	4.3.9.1-1	C	33	<p>Section 52.79(b) requires that COL applications include the FSAF and other technically relevant information required by 10 CFR 50.34. Regulatory Guide (RG) 1.70 provides guidance for satisfying the information requirements of Section 50.34(b). Within the scope of the standard plant design, the requirements of 10 CFR 50.34(b) are satisfied by referencing the design certification for all information specified in RG 1.70. However for each section of RG 1.70, the guidance identifies specific information necessary for the review of specific systems. In reviewing NEI 04-01, Revision D, the staff finds that there is a significant information gap between what is specified for an applicant to provide in its FSAR and what is specified in RG 1.70. Table 4.3.9.3-1 of NEI 04-01 shows the information to be provided in the FSAR. Table 4.3.9.3-1 includes only COL items, which satisfy a small portion of the information specified in RG 1.70. The FSAR should provide additional information to fill this gap. Referencing applicable design control document (DCD) sections is acceptable, but referencing a whole DCD without specifics is not adequate because the DCD contains tens of volumes and thousands of pages.</p> <p>Flood Protection Example: Item No. 3.4.1-1 - Description: Identify the safety-related systems and components that should be protected against floods - Applicable Sections of DCD: 3.4.1.x.a.</p> <p>Only one, which is a COL item, out of five items specified in RG 1.70 is required to be addressed in the FSAR according to NEI 04-01. Assuming the rest of the information is contained in the DCD, a pointer to reference specific applicable DCD sections for each item in RG 1.70 should be required in the FSAR. This requirement needs to be explicitly stated in NEI 04-01.</p> <p>Fire Protection Example: An example, which was provided by NEI (FSAR Section 9.5.1, Fire Protection System) and references specific DCD sections in its text, is acceptable. The ADAMS accession number for this example is ML050670455.</p> <p>NEI 04-01 may chose any of the formats (e.g., text description, or tabular form) to explicitly reference applicable DCD sections as required information in the FSAR.</p>
4.3.9.2.1	4.3.9.2.1-1	S	37	<p>Paragraph 2, Item d: Should be changed to read:</p> <p>The COL applicant must comply with all terms and conditions of the ESP, including addressing the COL Action Items listed within the ESP.</p>

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4.3.9.2.1	4.3.9.2.1-2	C	37	<p>Paragraph 3: The statement "In accordance with 10 CFR 52.39, information approved in the ESP is not subject to further NRC review at the COL stage." should be replaced by:</p> <p>In the absence of a compliance or adequate protection issue, information approved in the ESP is not subject to further NRC review at the COL stage. However, if the applicant should become aware of new and significant information that the ESP site is no longer in compliance with the terms and conditions of the ESP, the applicant should seek to modify the ESP in accordance with the provisions of 10 CFR 52.39.</p>
4.3.9.2.3	4.3.9.2.3-2	S	38	Last paragraph: Some of the information presented in these paragraphs appears to be redundant to what is presented in the previous section (4.3.9.2.2).
4.3.9.2.3	4.3.9.2.3-3	S	39	Paragraph 1: Some of the information presented in these paragraphs appears to be redundant to what is presented in the previous section (4.3.9.2.2).
4.3.9.2.7	4.3.9.2.7-1	S	40	Potential climatic and weather changes (e.g., resulting from global warming) should be added to the list of potential significant adverse changes in time-sensitive aspects of the site environs which the COL applicant may need to address in the FSAR.
4.3.9.2	4.3.9.2-1	C	43	Table 4.3.9.2-1: The "Completion Timing Code" should be changed from "ESP" to "ESP/COLA."
4.3.9.2	4.3.9.2-2	C	43	Table 4.3.9.2-1: The "Completion Timing Code" should be changed from "ESP" to "COLA." As stated in the Comment column, analyses for evaluating impacts of external hazards on control room habitability, emergency diesels, and other safety related equipment may be required at COL.
4.3.9.2	4.3.9.2-12	S	44	Table 4.3.9.2-1, Item 2-6: COL applicants will provide analyses of accidents (fire and explosion) external to the plant. Accidents leading to high heat flux...
4.3.9.2	4.3.9.2-13	S	44	Table 4.3.9.2-1, Item 2-7: Add following text in the Comment column. Depending on ESP treatment, impact to control room habitability from external fire hazards, if any, would be evaluated with the final design established at COL.
4.3.9.2	4.3.9.2-3	C	44	Table 4.3.9.2-1: The "Completion Timing Code" should be changed from "ESP" to "COLA." Analyses for evaluating impacts of accidental releases of flammable liquids or vapors on control room habitability may be required at the COL because the control room envelope design is not known at the ESP stage.
4.3.9.2	4.3.9.2-4	C	44	Table 4.3.9.2-1: The "Completion Timing Code" should be changed from "ESP" to "COLA." Analyses for evaluating impacts of accidental releases of toxic chemicals on control room habitability may be required at the COL because the control room envelope design is not known at the ESP stage.

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4.3.9.2	4.3.9.2-5	C	44	Table 4.3.9.2-1: The "Completion Timing Code" should be changed from "ESP" to "COLA." Analyses for evaluating impacts of external fires (e.g., high heat fluxes, smoke, chemical-bearing clouds) on control room habitability may be required at the COL because the control room envelope design is not known at the ESP stage.
4.3.9.2	4.3.9.2-6	C	45	Table 4.3.9.2-1: The "Completion Timing Code" should be changed from "ESP" to "COLA." Analyses for evaluating the hazards from the storage of on-site chemicals on control room habitability may be required at the COL because the type, amount, and location of chemicals stored on-site, as well as the control room envelope design, are not known at the ESP stage.
4.3.9.2	4.3.9.2-7	C	45	Table 4.3.9.2-1: The Comment column should discuss that if the applicant should become aware of new and significant information that the ESP site is no longer in compliance with the terms and conditions of the ESP (e.g., the climate site characteristics no longer represent extreme weather conditions due to climate change), the applicant should seek to modify the ESP in accordance with the provisions of 10 CFR 52.39.
4.3.9.2	4.3.9.2-8	C	45	Table 4.3.9.2-1: The Comment column statement should be modified. If cooling towers are to be used for the normal plant heat sink, they may have significant impacts on local meteorology and SSCs important to safety. Since the specific layout and design of the facility is not known at the ESP stage, it may not be possible to accurately predict the impact of cooling tower plumes on specific plant features. The potential impact of cooling towers on the design and operation of the facility may need to be considered as part of the COL detailed engineering.
4.3.9.2	4.3.9.2-9	S	46	Table 4.3.9.2-1: The Comment column statement should be modified. The ESP does not need to discuss the operational meteorological monitoring program. The intent of Section 2.3.3 of the ESP SSAR is to describe the meteorological monitoring program used to compile the onsite database presented in the ESP SSAR. The COL applicant should be defining the operational onsite meteorological program.
4.3.9.2	4.3.9.2-10	S	47	Table 4.3.9.2-1: The description column statement should be modified as follows:  COL applicants will address short term site-specific $\chi/Q$ values specified in Subsection 2.3.4 for the EAB [exclusion area boundary], LPZ [low-population zone], and CR [control room]. The COL applicant will compare site-specific (ESP) EAB and LPZ $\chi/Q$ values to the DCD EAB and LPZ $\chi/Q$ values. The COL applicant will also generate site-specific CR $\chi/Q$ values for comparison with the DCD CR $\chi/Q$ values. If the site-specific $\chi/Q$ values exceed the DCD $\chi/Q$ values, the COL applicant will address how the radiological consequences associated with all design-basis accidents continue to meet the dose reference values given in 10 CFR 50.34 and CR operator dose limits given in GDC 19 using site-specific $\chi/Q$ values.

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4.3.9.2	4.3.9.2-11	S	48	<p>Table 4.3.9.2-1: The description column statement should be modified as follows:</p> <p>COL applicants will address long-term site-specific <math>\chi/Q</math> values specified in Subsection 2.3.5 for the site boundary and special receptors of interest (e.g., nearest resident, garden, milk, and meat animals). The COL applicant will confirm that the site-specific (ESP) site boundary <math>\chi/Q</math> values are bounded by the DCD site boundary <math>\chi/Q</math> values. The COL applicant will also confirm that the specific release point characteristics (e.g., location, release height above grade, release height above adjacent buildings, building wake dimensions, effluent temperature, effluent flow rate, effluent velocity) and specific locations of receptors of interest (e.g., distance and direction to nearest resident and garden) used to generate the ESP long-term <math>\chi/Q</math> values bound the actual values provided at the COL stage. Otherwise, the COL applicant will revise (where necessary) the long-term site specific <math>\chi/Q</math> values and address how the off-site effluent concentrations and doses from normal plant operations will comply with 10 CFR Part 20 and Appendix I to 10 CFR Part 50.</p>
4.3.9.3	4.3.9.3-2	S	58	<p>The term “environmental qualification” applies to equipment important to safety to assure this equipment remains functional during and following design-basis events. Describe the acceptance criteria to ensure that the equipment is capable of performing its design safety functions under all normal environmental conditions, anticipated operational occurrences, and accident and post accident environmental conditions. Acceptance criteria are based on 10 CFR 50.49 as it relates to specific requirements regarding the qualification of electrical equipment important to safety that is located in a harsh environment. Specific review criteria are contained in SRP Section 3.11.</p>
4.3.9.3	4.3.9.3-3	S	58	<p>General Comment: Combined license applicants should provide the list of all the regulatory guides and IEEE standards and generic safety issues applicable to their licensing basis.</p>
4.3.9.3	4.3.9.3-1	S	61	<p>Table 4.3.9.2-1, Items 3-5 and 3-6: In DCD Tier 2, Section 3.6.4.2, the applicant states that COL applicants referencing the AP1000 certified design will complete the LBB[leak-before-break] evaluation, which may necessitate lowering the detection limit for unidentified leakage in containment from 1.89 L/min (0.5 gpm) to 0.945 L/min (0.25 gpm). If so, the COL applicant shall provide a leak detection system capable of detecting a 0.945 L/min (0.25 gpm) leak within 1 hour and shall modify appropriate portions of the DCD including DCD Tier 2, Sections 5.2.5, 3.6.3.3, and 11.2.4.1, “Sump Level Instrument Testing.”</p> <p>In addition, the applicant will also need to modify portions of DCD Tier 2, Chapter 16, “ Technical Specifications.” TS 3.4.7 (and Bases), TS Bases B3.4.9 and TS 3.7.8 (and Bases).</p>

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4.3.9.5	4.3.9.5-2	S	75	<p>Table 4.3.9.5-1, Item 5-2: The preservice inspection program will include examinations of the reactor vessel closure head equivalent to those outlined in Section 5.3.4.7.</p> <p>The inservice inspection program will address the susceptibility calculations, inspection categorization, inspection of the reactor vessel closure head, and associated reports and notifications as defined in NRC Order, EA-03-009, "Interim Inspection Requirements for Reactor Vessel Heads at PWRs," or NRC requirements that may supercede the Order.</p> <p>The COL applicant will identify any areas of inspection required by Order EA-03-009, or required by subsequent NRC requirements that may supercede the Order, that the applicant will be unable to perform or choose to perform an alternate. The applicant will submit to the NRC for review and approval a description of the proposed inspections to be performed, a description of any differences from applicable NRC requirements, and an assessment of the applicability of the inspections the applicant proposes to perform to address NRC requirements.</p> <p>The inservice inspection program will also include provisions to ensure that boric acid corrosion does not degrade the reactor coolant pressure boundary. (DCD 5.4)</p>
4.3.9.6	4.3.9.6-1	C	79	<p>Update reference to combustible gas control requirements. Replace "50.34(f)" with "50.44." Effective October 16, 2003, the NRC extensively revised 10 CFR 50.44, "Combustible Gas Control for Nuclear Power Reactors," and made associated changes to 50.34. 50.44 is now the correct reference.</p>

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4.3.9.6	4.3.9.6-2	S	83	<p>Table 4.3.9.6-1, Items 6-11 and 6-12: The preservice inspection program will include examinations of the reactor vessel closure head equivalent to those outlined in Section 5.3.4.7.</p> <p>The inservice inspection program will address the susceptibility calculations, inspection categorization, inspection of the reactor vessel closure head, and associated reports and notifications as defined in NRC Order, EA-03-009, "Interim Inspection Requirements for Reactor Vessel Heads at PWRs," or NRC requirements that may supercede the Order.</p> <p>The COL applicant will identify any areas of inspection required by Order EA-03-009, or required by subsequent NRC requirements that may supercede the Order, that the applicant will be unable to perform or choose to perform an alternate. The applicant will submit to the NRC for review and approval a description of the proposed inspections to be performed, a description of any differences from applicable NRC requirements, and an assessment of the applicability of the inspections the applicant proposes to perform to address NRC requirements.</p> <p>The inservice inspection program will also include provisions to ensure that boric acid corrosion does not degrade the reactor coolant pressure boundary. (DCD 5.4)</p>
4.3.9.8	4.3.9.8-2	S	91	Perform a grid stability analysis to verify that the electrical grid remains stable in event of loss of the nuclear unit generator, the largest other unit on the grid, or the most critical transmission line.
4.3.9.8	4.3.9.8-4	S	91	Describe how the Class 1E power systems meet RG 1.75.
4.3.9.8	4.3.9.8-5	S	91	Describe the details of the station blackout (SBO) that involves the loss of offsite power concurrent with turbine trip and failure of the onsite emergency ac power system and the plant's ability to cope with and recovery from an SBO event based on 10 CFR 50.63. Specific review criteria are contained in SRP Section 8.1 and Appendix B to SRP 8.2. (Not described.)
4.3.9.8	4.3.9.8-6	S	91	Describe how you meet IEEE Std. 384, "Criteria for Independence of Class 1E Equipment and Circuits." (Not described.)
4.3.9.8	4.3.9.8-3	S	92	Describe the uninterruptible power supply (UPS) system. Failures of UPS system have been shown to constitute one of the main causes of forced plant outages. Verify that the failure or unavailability of a single battery, battery charger, or inverter will not result in a plant trip.

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4.3.9.9	4.3.9.9-3	S	94	Paragraph 3: Provide a discussion and example of the FSAR fire protection information that would be expected to be submitted in a COL application. The fire protection program-specific discussion was discussed in March 3, 2005, meeting between NRC and NEI.
4.3.9.9	4.3.9.9-5	S	95	General guidance provided by RG 1.70 for FSAR Chapters 9 (Auxiliary Systems) and 10 (Power Conversion Systems ) states that the capability of the system to function without compromising the safe operation of the plant under both normal or transient situations should be clearly shown by the information provided (i.e., a failure analysis). Using as examples a system which performs safety-related functions from FSAR Chapters 9 and 10, summarize how the RG 1.70 guidance has been implemented in the reference DCD.  Explain how design features that affect the initiating frequency of design-basis accidents (DBAs) have been addressed (i.e., main feedwater system reliability).
4.3.9.9	4.3.9.9-6	S	95	Describe the normal and emergency lighting systems. Identify the vital areas and hazardous areas where lighting is needed for safe shutdown of the plant and the evacuation of the personnel in the event of an accident. Describe also the emergency lighting in plant areas for safe ingress and egress of personnel following loss of all ac power e.g., battery packs.
4.3.9.9	4.3.9.9-1	C	97	Table 4.3.9.9-1, Exception 3: RG 1.78, Revision 1, December 2001, replaces RG 1.78, June 1974. Therefore, NEI 04-01 should state that the COL applicant needs to conform with the appropriate guidance of the current version of RG 1.78 "Regulatory Position" instead of the previous version of RG Position C.3 and C.7 for the site-specific offsite toxic sources.
4.3.9.9	4.3.9.9-2	C	97	Table 4.3.9.9-1, Exception 4: RG 1.78, Revision 1, December 2001, replaces RG 1.95, Revision 1, January 1977 (RG 1.95 has been withdrawn). Therefore, NEI 04-01 should state that the COL applicant needs to conform with the appropriate guidance of the current version of the RG 1.78 "Regulatory Position" instead of RG 1.95, Revision 1, January 1977, Positions C.4.a and C..4 (note that Position C.49 does not exist and therefore, NEI 04-01 should be revised accordingly) for the site-specific offsite chlorine sources.
4.3.9.9	4.3.9.9-4	C	104	Table 4.3.9.9-2, Item 10: Revised NFPA publications according to the NUREG-1793, Vol. 1, Section 9.5.1.
4.3.9.10	4.3.9.10-1	S	109	Table 4.3.9.10-1, Item 10-1: Flow-Accelerated Corrosion (erosion-corrosion) can affect carbon steel portions of other systems beyond the main steam and power conversion system. The FSAR requirements entry on erosion-corrosion should be broadened to other systems containing carbon steel that may be susceptible to erosion-corrosion.

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4.3.9.10	4.3.9.10-2	S	109	General guidance provided by RG 1.70 for FSAR Chapters 9 (Auxiliary Systems) and 10 (Power Conversion Systems ) states that the capability of the system to function without compromising the safe operation of the plant under both normal or transient situations should be clearly shown by the information provided (i.e., a failure analysis). Using as examples a system which performs safety-related functions from FSAR Chapters 9 and 10, summarize how the RG 1.70 guidance has been implemented in the reference DCD.  Explain how design features that affect the initiating frequency of design-basis accidents (DBAs) have been addressed (i.e., main feedwater system reliability).
4.3.9.10	4.3.9.10-3	C	109	Guidance provided by RG 1.70 for FSAR Section 10.4.5 (Circulating Water System) states that the potential for flooding safety-related equipment due to the failure of a system component such as an expansion joint should be discussed. Explain how the RG 1.70 guidance has been addressed for the circulating water system in the reference DCD.
4.3.9.13.1	4.3.9.13.1-1	S	133	Under Description, Item 13-3: Change Operating to Operations and 0654-FEMA to 0654/FEMA.
4.3.9.13.2	4.3.9.13.2-1	S	136	Paragraph 5: Provide a discussion on fire protection program implementation and its availability for NRC inspection prior to new fuel arrival at the site. Also, revise Table 4.3.9.13-2 and include schedule of fire protection inspections prior to fuel arrival at the site.
4.3.9.13.3	4.3.9.13.3-3	S	138	2nd sentence: Change ESPs to ESP applications
4.3.9.13.3	4.3.9.13.3-4	C	138	"Subject of on-going discussions." NEI should review re-proposed Part 52 language.
4.3.9.13.3	4.3.9.13.3-5	C	139	Paragraph 1: Add language to reflect 10 CFR 52.17(b)(3) requirements associated with a description of contacts and arrangements made with Federal, State, and local agencies.
4.3.9.14.3.2	4.3.9.14.3.2-4	S	152	Table 4.3.9.14-1 (ITAAC for Ultimate Heat Sink [UHS]): Provide sequence numbers for the four interface requirements.
4.3.9.14.3.2	4.3.9.14.3.2-5	S	152	Table 4.3.9.14-1 (ITAAC for UHS): On the first interface requirement of sufficient cooling water, explain how the specified ITAAC acceptance criteria associated with elevations of the suction lines for Item 1 can demonstrate that sufficient cooling water will be provided at the plant specific UHS to satisfy the interface requirement 1.(a). There is no information in the DCD nor in the FSAR as specified in Section 4.3.9.9 of NEI 04-01 to support the adequacy of the acceptance criteria for Items 1.(a) and 1.(b).
4.3.9.14.3.2	4.3.9.14.3.2-6	S	159	Table 4.3.9.14-3 identifies ABWR Tier 1 interface requirements for reactor service water system and circulating water system. Identify the corresponding site specific ITAAC tables in Section 4.3.9.14.3.2.

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4.3.9.14.3.3	4.3.9.14.3.3-2	S	161	Table 4.3.9.14-4: Revise title to be consistent with other Section 4.3.9.14 tables, such as the following: Center the following text: Table 4.3.9.14-4 Emergency Planning Form and Content of Inspections, Tests, Analyses, & Acceptance Criteria (ITAAC) Combined License (COL) Application - Generic Basis
4.3.9.14.3.3	4.3.9.14.3.3-1	C	162	Characterize Table 4.3.9.14-4 as the minimum EP [emergency planning] ITAAC required. The "future revision" of Table 4.3.9.14-4 will need to be reviewed.
4.3.9.15	4.3.9.15-4	S	173	This section should discuss the generic requirements for the case where the applicant is not using a certified design's DCD. Something similar to the following could be inserted in the text:  For a COL application that does not refer to a certified design, a description of the analyzed design-basis accidents [DBAs], the relevant design and dose criteria, and the DBA analyses, including methodology, inputs and assumptions and the analysis results, should be supplied in sufficient detail so that the NRC staff may make a finding against 10 CFR 50.34(a)(1).
4.3.9.15	4.3.9.15-5	S	173	This section should also remind potential applicants that use a certified design that they should address any conditions on use of the design control document and any COL Action Items listed within DCD and the NRC staff's FSER for the referenced design certification.
4.3.9.15	4.3.9.15-6	S	174	Table 4.3.9.15-1: This table only addresses the AP1000 DCD COL Action Items for the DBA dose analyses. This should be more general and refer to the information needed for the FSAR Chapter 15 analyses, including analyses other than dose analyses, regardless of whether a certified design is referenced (see the SRP).
4.3.9.15	4.3.9.15-7	S	174	Table 4.3.9.15-1: If the table is only referring to the AP1000 DCD and its COL Action Items, change the title of the table to "AP1000 DCD Site Specific Information Requirements - Chapter 15." Add a second table for generic requirements to provide the required information for FSAR Chapter 15 analyses, including analyses other than the radiological consequences analyses.

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4.3.9.15	4.3.9.15-8	S	174	<p>Table 4.3.9.15-1: Item 15-2 should cross-reference AP1000 COL Action Items 2.3.4-1 and 2.3.4-2 on short-term atmospheric dispersion factors. Using the language from the NRC staff's FSER on the AP1000 design would make the necessary information for the action items consistent. The following is suggested:</p> <p>Combined license applicants referencing the AP1000 certified design will confirm that the site-specific <math>\chi/Q</math> values are bounded by the values in AP1000 DCD Tier 2, Table 15A-5, for offsite receptors and values in AP1000 DCD Tier 2, Table 15A-6, for the control room. No further DBA dose analyses are required for sites within the bounds of the site parameters for atmospheric dispersion, as given in AP1000 DCD Tier 1, Table 5.0-1.</p> <p>For a selected site with any of the offsite <math>\chi/Q</math> values in excess of the bounding <math>\chi/Q</math> values in AP1000 DCD Tier 2, Table 15A-5, the COL applicant will address how the radiological consequences associated with all DBAs continue to meet the radiological dose consequence criteria given in 10 CFR 50.34(a)(1)(ii)(D)(1) and (2). This is AP1000 COL Action Item 2.3.4-1.</p> <p>For a selected site with control room <math>\chi/Q</math> values in excess of the bounding <math>\chi/Q</math> values in AP1000 DCD Tier 2, Table 15A-6, the COL applicant will address how the radiological consequences associated with all DBAs will stay within the control room operator dose limits given in General Design Criteria (GDC) 19, "Control Room," using site specific <math>\chi/Q</math> values. This is AP1000 COL Action Item 2.3.4-2.</p>
5.2	5.2-4	C	263	Paragraph 4: The word "inspectors" should be replaced by "staff."
5.2	5.2-5	C	264	Paragraph 2: The word "inspectors" should be replaced by "staff"... However, NRC staff will audit plant-specific design changes and configuration management.
5.3.1	5.3.1-1	S	264	Paragraph 1: The licensee must submit a letter to NRC prior to fuel arrival at the site and that fire protection program is available for inspection.
6.2.2.1	6.2.2.1-3	C	271	Last paragraph: The staff does not agree with the factors used to define whether there is a substantial increase in the consequences to the public. The staff does not believe that these criterion have been previously defined and no justification for the factors exists. The threshold for these factors seems much too high. For example, the uncertainty associated with these calculations is very large. Using this uncertainty to define a substantial increase is not appropriate. Likewise the 25% is not justified, nor is the use of the values in 10 CFR 50.34(a)(1)(i)(D).
6.4.1	6.4.1-1	S	273	Title: Add "... Environmental Report (ER) ..." to the title.

Chapter/ Section #	Tracking #	NRC Action	Page #	Proposed Change
6.4	6.4-1	C	273	Changes that materially affect approved ESP emergency preparedness information. NEI should review re-proposed Part 52 language.
6.4	6.4-2	S	273	Paragraph 2: Add the following to the last sentence:  ... the final safety evaluation report (FSER) ...
6.4.2	6.4.2-1	S	276	Title: Add "... Final Safety Evaluation Report (FSER) ..." to the title.
6.4.2	6.4.2-2	S	277	Paragraph 1: Change the second sentence in the first paragraph to read:  If the design changes are bounded by the site characteristics and PPE in the SSAR, no ....
6.4.2	6.4.2-3	S	277	Paragraph 1: Change the last sentence to read:  ... design changes that affect source terms and therefore, the radiological consequences at the EAB and, LPZ, ...

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**S - Suggested change to improve guidance.**

**C - Comment NRC Staff believes needed to make guidance reflective of NRC regulations and guidance.**