

Britt T. McKinney
Sr. Vice President & Chief Nuclear Officer

PPL Susquehanna, LLC
769 Salem Boulevard
Berwick, PA 18603
Tel. 570.542.3149 Fax 570.542.1504
btmckinney@pplweb.com



APR 06 2006

Chief, Rules Review and Directives Branch
U. S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

1/31/06
71 FR 5089
①

RECEIVED

2006 APR 13 AM 9:23

RULES AND DIRECTIVES
BRANCH
U.S.NRC

**SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON DRAFT REVISION 3,
"STANDARD REVIEW PLAN, SECTION 12.5,
OPERATIONAL RADIATION PROTECTION PROGRAM"
OF NUREG-0800
PLA-6040**

**Docket Nos. 50-387
and 50-388**

Reference: (Materials published in the Federal Register on January 31, 2006, Pages 5089-5090)

The following are PPL Susquehanna, LLC's comments on the Draft Revision 3 of "Standard Review Plan, Section 12.5 of NUREG-0800." The proposed rule was published in the *Federal Register* on Tuesday, January 31, 2006, Pages 5089-5090.

GENERAL:

Responding to the types of information requested of the applicant, and the level of detail requested for those types, results in a very substantial effort on the part of the applicant and a very substantial amount of material for NRC staff to review. Some of the information requested becomes available in phases as the construction of the facility and its readiness for handling of radioactive materials progresses. The draft Section 12.5 is, at several locations, written to recognize that progression. It may be helpful, however, if the document were further clarified as to the level of detail expected of the applicant at the time of submission of the application and what detail may be provided at specified later milestones in the construction, testing and initial operation phases of the station.

SPECIFIC COMMENTS:

1. Sections I.B.1 and I.B.4, page 12.5-2 – The draft document requests detailed information on numbers of instruments of various types and specifications of those instruments. Clearly, the applicant needs to express a commitment to having and using an adequate inventory of instruments appropriate for the types of radiation and levels of radiation fields expected to be observed during phases of construction,

SESP Review Complete
Temp letter = ADM-013

R-RIDS = ADM-03
Add = R. Pedersen
(RLP)

testing, and operation of the facility. Numbers of instruments of specific types may, however, vary throughout the life of the facility; that is, the numbers and specifications of instruments are dynamic rather than static. The wording of Section I.B may be able to be modified to provide NRC staff with sufficient information to be comfortable with the commitments of station staff to adequate radiation measurement without requiring the level of detail implied by the existent wording of the sections.

2. Sections I.C.3, I.C.4, and I.D.1, page 12.5-3 – Similar to comment #1 above, the draft document requests detailed information on staffing, equipment, and procedures. Staffing size is dynamic and will vary according to experiences and improvements in efficiency and effectiveness of staff operations. Equipment needs will vary also with station experience and staff effectiveness. Procedural development will occur as construction and testing phases progress, and procedural changes will occur throughout plant life. Again, for the applicant, the balance is to provide sufficient information for NRC reviewers to be comfortable that compliance with regulations will be ensured without spending effort providing unnecessary levels of detail. If NRC could provide clarifying information as to the level of detail expected of the applicant, at specific times in the construction, testing, and initial operational periods, that would be helpful.
3. Section II, page 12.5-12 paragraph 7 (d). With the use of scrubs as modesty garments, a change room for donning protective clothing and storage of personal items is no longer a minimum required radiation protection facility.
4. Section II.B.7.c, page 12.5-12 and Section IV, page 12.5-18, line 20 – Since single-use protective clothing is used at some stations within the U.S.A., the stated facilities and equipment for all types of personnel protective equipment may not be needed. For example, a laundry may not be required at the facility.
5. Section II.C, page 12.5-13, line 6 of Section II.C – Regarding the words “allowable working time”, applicants may choose to specify individual working or “stay” times for only jobs where the work may be expected to exceed a pre-selected dose or dose-rate criterion. The current wording of the draft document seems to suggest that stay times must be specified for all work on all RWPs. More flexible wording, to allow for applicant action as specified above, may be appropriate.
6. Section II.C, page 12.5-13, line 9 of Section II.C – The word “reviewed” at the end of the line is potentially confusing. Is the sentence referring to a review performed by the applicant or to a review performed by NRC staff? Also, if the implication is that all of the listed procedures would be completely developed by the time of the license

application, then the wording would not seem to reflect the progression of activities anticipated to occur at stations as they move from early construction, through later construction, through testing, and into operational phases for the plant. (Similar wording is noted to exist in Section IV on page 12.5-19.)

7. Section II.C, page 12.5-14, lines 3 and 7 – The word “possible” should be replaced with a word more like “appropriate,” “warranted,” or “reasonable.” The current word “possible” can be taken to imply measures should be taken which would go beyond those taken to ensure exposures are “as low as reasonably achievable.” (Underline added).
8. Section IV, page 12.5-18, last paragraph, lines 1 to 3 – The wording of the sentence appears to go beyond regulations on personnel monitoring. The word “will” as opposed to “shall” appears, but it is preferable that the wording of the sentence reflect more clearly the regulations on personnel monitoring.
9. Section IV, page 12.5-18, last paragraph, notably lines 1, 4, and 7 of that paragraph – Several types of accredited personnel dosimetry devices are available and more may be expected to become available. One option would be to remove references to particular device types in this paragraph and replace those references to “accredited personnel dosimetry devices” or similar words. Another option would be as follows: (a) in line 1, change “i.e.” to “e.g.,” and (b) in lines 4 and 7, to move toward current options, add “OSL” to the listings of device types. (This issue is also addressed in editorial comment #8 below.)
10. Section IV, page 12.5-19, lines 1 to 3 – The wording of the sentence (and especially the first phrase, including the words “whole” through “basis”) appears to go beyond regulations on personnel monitoring for internal dose. The word “will” as opposed to “shall” appears, but it is preferable that the wording of the sentence reflect more clearly the regulations on personnel monitoring for internal dose.

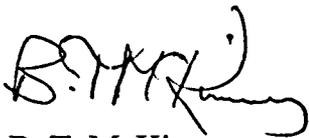
EDITORIAL COMMENTS:

1. Section II, page 12.5-7, item #12 – “Respirator” should be “Respiratory.”
2. Section II, page 12.5-8, item #14 – the second “the” of three in line 1 appears to be unnecessary.
3. Section II, page 12.5-8, item #21 – there appears to be something amiss in the wording of lines 2 and 3.

4. Section II, page 12.5-8, item #22 – should the comma on line 3 be placed after “of” rather than in its current location?
5. Section II.B.5.d, page 12.5-11, line 2 – should “ocularly” be “optically”?
6. Section II. C, page 12.5-13, line 19 – should “speed” be “spread”?
7. Section II.E, page 12.5-15, item #3, line 1 – “regulation” should be “regulations.”
8. Section IV, page 12.5-18, last paragraph – in line 2, “or optically stimulated” should be placed after “thermoluminescent;” in line 4, “, OSL,” should be placed after “TLD;” and in line 7, “, OSL,” should be placed after “TLD.”
9. Section IV, page 12.5-19, last paragraph of the section, line 5 – should the words “to members of the general public” be added between “exposures” and “as”?

If you have any questions, please contact Mr. R. A. Tombasco at (610) 774-7720.

Sincerely,



B. T. McKinney

cc: NRC Region I
Mr. A. J. Blamey, NRC Sr. Resident Inspector
Mr. R. V. Guzman, NRC Project Manager
Mr. R. Janati, DEP/BRP