June 25, 2007

MEMORANDUM TO: Stephanie M. Coffin, Chief
AP1000 Projects Branch
Division of New Reactor Licensing
Office of New Reactors

FROM: Christian J. Araguas, Vogtle ESP Project Manager **/RA/**
AP1000 Projects Branch
Division of New Reactor Licensing
Office of New Reactors

SUBJECT: TRIP REPORT FROM SITE VISIT TO THE VOGTLE EARLY SITE PERMIT (ESP) SITE AND AUDIT OF HYDROLOGY, GEOLOGY, GEO-TECHNICAL ENGINEERING, SEISMOLOGY, AND HEALTH PHYSICS ASPECTS OF THE VOGTLE ESP APPLICATION

On January 10-12, 2007, NRC staff of the Office of New Reactors visited the Vogtle ESP site to familiarize itself with the site and to conduct an audit of the ESP application and reference documents pertaining to hydrology, geology, geotechnical engineering, seismology, and health physics. Enclosed is the trip report from this activity.

Docket No. 52-011

Enclosure:

As Stated

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DATE	04/02/07	04/02/07	05/04/07	6/25/07

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TRIP REPORT
SITE VISIT AND AUDIT
VOGTLE EARLY SITE PERMIT APPLICATION REVIEW
January 10-12, 2007

Subject

Site visit and audit at the Vogtle early site permit (ESP) site in support of the review of hydrology, geology, geotechnical engineering, seismology, and health physics aspects of the Vogtle ESP application.

Date of Travel

January 10-12, 2007

NRC Staff Participants

- Christian Araguas, NRC Safety Project Manager
- Mark Notich, NRC Environmental Project Manager
- Goutam Bagchi, NRC Technical Reviewer
- Hosung Ahn, NRC Technical Reviewer
- Clifford Munson, NRC Technical Reviewer
- Yong Li, NRC Technical Reviewer
- Gerry Stirewalt, NRC Technical Reviewer
- Jean-Claude Dehmel, NRC Technical Reviewer
- Charlie Hinson, NRC Technical Reviewer
- Lance Vail, Pacific Northwest National Laboratory (PNNL) Technical Reviewer
- Christopher Cook, Pacific Northwest National Laboratory (PNNL) Technical Reviewer
- Charles Kincaid, Pacific Northwest National Laboratory (PNNL) Technical Reviewer
- Russ Wheeler, US Geological Survey (USGS) Technical Reviewer
- Anthony Crone, US Geological Survey (USGS) Technical Reviewer
- Charles Mueller, US Geological Survey (USGS) Technical Reviewer

Applicant Staff Participants

- Jim Davis, SNC
- Tom Moorer, SNC
- Tom McCallum, SNC
- Don Moore, SNC
- Amy Aughtman, SNC
- Matt Montz, SNC
- Dale Fulton, SNC
- Bill Lettis, William Lettis and Associates (WLA)
- Scott Lindvall, William Lettis and Associates (WLA)
- Ross Hartleb, William Lettis and Associates (WLA)
- Phil Young,TtNus
- Gary Gunter, TtNus
- Joe Britt, SNC

- Joe Mancuso, SNC
- Mary Beth Lloyd, SNC
- Dan Patton, Bechtel
- Bob Prunty, Bechtel
- Louise Headland, Bechtel
- Loran Matthews, Bechtel
- Mustafa Samad, Bechtel
- Randy Cumbest, Bechtel
- John Prebula, Bechtel
- Jim Marrone, Bechtel
- David Fenster, Bechtel
- Jose Clemente, Bechtel
- Robin McGuire, Risk Engineering, Inc. (REI)

Purpose

As part of the NRC staff's review of the Vogtle ESP application, the staff assesses the compliance of the applicant's site safety analysis report Site Safety Analysis Report (SSAR) with applicable regulations. In support of the staff's review of the applicant's SSAR, staff technical reviewers visit the ESP site to observe relevant onsite and local area conditions. The staff also audits information in the site safety analysis report (SSAR) and its references. These audits may include visits to the applicant's offices to obtain a better understanding of the applications content through technical discussions with knowledgeable applicant staff.

This trip report documents the staff's site visit and audit conducted at the Vogtle ESP site.

Discussion

On January 10-12, 2007, the NRC and its consultants from Pacific Northwest National Laboratory (PNNL), and the U.S. Geological Survey conducted a site visit and audit of the proposed Vogtle Early Site Permit Site outside of Waynesboro, GA. The specific subject matters discussed during the audit were hydrology, geology, geotechnical engineering, seismology, and health physics. During the audit, the NRC staff separated into three groups: geological reviewers, hydrological reviewers, and health physics reviewers.

On Wednesday, January 10, 2007, the NRC geological reviewers traveled to the Savannah River Site (SRS) with Southern Nuclear Operating Company Inc. (SNC), William Lettis and Associates (WLA) and Bechtel staff to visit the Savannah River fluvial terraces. NRC staff viewed the Ellenton Terrace (Qte) surface in the vicinity of the surface projection of the Pen Branch fault. WLA discussed the results of the geologic and geophysical investigations, including the global positioning systems surveys of the Qte terrace, used to support the absence of Quaternary deformation related to reverse slip on the Pen Branch fault.

Upon returning to the Vogtle site, NRC staff had the opportunity to view core samples from ESP boring B-1003. The available core samples included portions of the Barnwell Group, Utley Limestone, and Blue Bluff Marl. This was followed by a tour of the Vogtle site in the vicinity of the proposed intake structure. NRC staff visited one of several locations at the Vogtle site where small-scale deformation structures in the Barnwell Group are exposed. These

deformation structures are interpreted by WLA to be non-tectonic and the result of localized dissolution of the underlying Utley Limestone.

The latter part of the day consisted of several presentations and discussions related to the NRC's draft requests for additional information (RAIs) on geology and surface faulting. WLA further discussed the Savannah River fluvial terraces mapping results and their interpretations of the small-scale deformation structures in Barnwell Group at the Vogtle site. They also described the available seismic reflection surveys and borehole data that were used to constrain the location of the Pen Branch fault beneath SRS and Vogtle site.

The NRC hydrological reviewers spent the first half of the day viewing presentations and initiating discussions on the questions that the staff sent to SNC prior to arriving for the audit (see questions below). During the latter part of the day, all of the hydrological experts participated in a tour of the principal hydrologic features of the proposed Vogtle ESP site. These locations included the existing and proposed intake structures, natural and man-made site drainage features, the proposed/existing barge slip, the proposed reactor and cooling tower construction sites, and Mallard Pond.

The NRC health physics reviewers began the day with a site tour which included the proposed locations of the liquid effluent discharge points, ground and surface water monitoring stations, Department of Energy's SRS liquid effluent discharge points, key radiological environmental monitoring program (REMP) stations, and the onsite dose calculation manual (ODCM) defined dose receptors. Following the tour, the staff met with SNC and its consultants to discuss staff concerns and questions developed during the staff's review of the Vogtle ESP application. Prior to the audit, the staff sent a list of questions to SNC to be prepared to discuss during the audit (see below). Some of the discussion questions relate to how SNC calculated the liquid and gaseous source terms that were used in determining the estimated dose to site construction workers. Other questions focused on radiological impacts from liquid and gaseous effluent releases, and radiological monitoring.

On Thursday, January 11, 2007, SNC spent the day providing a series of presentations that focused on the NRC's draft ground motion and geotechnical RAIs. The presentations and resulting discussions related to ground motion primarily focused on the update of the Charleston seismic source and the methodology used to determine the control point site specific uniform hazard response spectra (UHRS) and the vertical safety shutdown earthquake (SSE). WLA described the process they used to elicit expert opinion in order to update the Charleston seismic source. Bechtel described some of the sensitivity studies from their site response analysis. They noted that site response at the Vogtle site is dominated by variations in the Coastal Plain sediments as well as the contact between the Coastal Plain sediments and the underlying Dunbarton Triassic basin.

The ground motion discussions were followed by a geotechnical presentation given by Bechtel. Bechtel discussed the criteria (based on Standard Penetration Test (SPT) N-values and Cone Penetant Test (CPT) tip resistance) used to determine the presence of any weak zones within the three soils groups. Based on these results, Bechtel determined that no weak zones were identified in the Blue Bluff Marl at the Vogtle site. SNC also discussed its plans to perform dynamic testing on soil samples at the Vogtle site in order to verify suitability of the Electric Power Research Institute (EPRI) and SRS shear modulus and damping curves that were used as inputs to the site response modeling at the Vogtle site.

The NRC hydrological reviewers spent all day Thursday discussing with the applicant the list of questions that were provided before the audit (see questions below). SNC was able to resolve ten of the staff's listed questions with the discussions that were held with the NRC staff. The remaining thirteen questions were separated into two categories. One category was created for the questions that the staff plans to issue as formal RAIs in March 2007, and another category was created for the questions that the staff felt were pertinent for the development of RAIs in March 2007 (urgent information needs). At the conclusion of the hydrological audit, the staff gave a summary of how the questions provided would be dispositioned.

Following the site audit which was concluded Thursday, January 11, 2007, on Friday, January 12, 2007, staff from the US Nuclear Regulatory Commission and a consultant from PNNL met with employees of the US Army Corps of Engineers (USACE) at the Savannah District Office. The purpose of this meeting was to discuss both environmental and safety aspects of the Vogtle ESP application. The agenda for the meeting consisted of four items: (a) process, steps, and timeline associated with dredging permits required for construction/operation of the ESP facility; (b) low water conditions and minimum in-stream flows in the Savannah River at the ESP site; (c) status regarding plans for decommissioning or rehabilitation of the New Savannah Bluffs Lock and Dam; and (d) the cascade failure of dams upstream of the ESP site described in SSAR Section 2.4.

Site Audit Discussion Questions

1. (SSAR Section 2.4.1.2) Provide the reservoir operation rules (or regulation schedules) for Hartwell Lake, Russell and Thurmond reservoirs during the wet and dry seasons, and discusses the potential impact of the Proposed Water Management Changes of these reservoirs to the site especially during the dry season (2.4.1.2.4). Also needed are discussions related to local intense precipitation and site area drainage.

Staff Determination: **CLOSED**

The requested information is contained in the USACE Water Control Manual, the USACE Drought EA on the Savannah River Basin, and NOAA HMR 51 and 52. No further information is necessary.

2. (SSAR Section 2.4.3.3) Describe briefly the procedures and the parameters to compute wave run-up and wind set-up estimates on the Table 2.4.3-4.

Staff Determination: **CLOSED**

The requested information is contained in the USACE Coastal Engineering Manual. No additional information is needed.

3. (SSAR Section 2.4.4.2) The dam breach model from HEC-RAS was based upon cross-sections obtained from the Corps of Engineers. These cross sections were compared to ones developed from USGS topographic maps. Please present these comparisons.

Staff Determination: **CLOSED**

Cross-sectional information was obtained from USACE. These cross-sections were compared with USGS Topographic Maps of the areas near Augusta and Thurmond Dam. No additional information is needed.

4. (SSAR Section 2.4.4.2) Present the calculations used to estimate the dam breach parameters discussed on page 2.4.4-4 and outlined in the USBR reference.

Staff Determination: **URGENT INFORMATION NEED**

Provide a narrative describing the process used to compute the maximum stage due to a cascade failure of upstream dams, including the sensitivity of the initial conditions (e.g., initial water surface elevations in each reservoir), and show how the calculations provide the bounding case. In addition, provide a detailed parameter list (including alternate methods that were considered in the analysis) associated with the dam breach parameters.

5. (SSAR Section 2.4.4.3) Describe briefly the procedures and parameters used to compute wave height and run-up.

Staff Determination: **CLOSED**

The requested information is contained in the USACE Coastal Engineering Manual. No additional information is needed.

6. (SSAR Section 2.4.7.3) Present the rates of cooling water, make-up water, and fire protection water needed for both existing and new plants.

Staff Determination: **FORMAL RAI**

The requested information is contained in environmental report (ER) Section 2.3.2, Tables 2.3.2-12 and -13. The SSAR is to be revised by including a reference to the ER in Section 2.4.7.3 of the SSAR.

7. (SSAR Section 2.4.8.1) Provide the amount of make-up water to the heat sink-service water system pumped from site ground wells and the type of aquifer(s) to be used. Discuss that the on-site aquifer system has enough capacity to provide the maximum make-up water requirement.

Staff Determination: **CLOSED**

Pumped groundwater is not required for the ultimate heat sink, and the proposed reactors will employ a passive ultimate heat sink design. No additional information is needed.

8. (SSAR Section 2.4.10) Define and describe the hydrologic parameters, such as intensity of short term rainfall for roof drainage, probable maximum winter precipitation that combines with the snow accumulation for roof loading of all safety-related structures.

Staff Determination: **FORMAL RAI**

This requested information is contained in SSAR Section 2.3.1.3.4. The SSAR is to be revised by providing a reference to SSAR Section 2.3.1.3.4 in Section 2.4.10 of the SSAR.

9. (SSAR Section 2.4.11) Describe briefly how the parameters of different distribution functions are estimated in Table 2.4.11-4, either the method of moment or the maximum likelihood.

Staff Determination: **CLOSED**

The parameters were developed using the method of moments. No additional information is needed.

10. (SSAR Section 2.4.12) (P. 2.4.12-7, last para.): Discuss the reasons why OW-1001 well failed. How far is the replacement well (OW-1001A) located from the failed one?

Staff Determination: **FORMAL RAI**

SSAR Appendix 2.4A text (e.g. 2.4A-6) will be clarified to explain which wells were abandoned. Because well OW-1001A data are not indicative of hydraulic head in the water table aquifer, data from this well shown in Figures 2.4.12-8 through -11 in the SSAR and ER Figures 2.3.1-17 through -20 will be removed, and updated figures will be provided. [The staff viewed the wells (OW-1001, OW-1002, and OW-1001A while on the site visit, and they are in the immediate vicinity of one another, i.e., all within 20 to 30 feet.]

11. (SSAR Section 2.4.12) (P. 2.4.12-8, Water Table Aquifer) Figure 2.4.12-4 indicates that the recovery of groundwater levels, after dewatering activities, were completed in a year or so. Discuss the main source(s) of the recovery water, either recharge or nearby groundwater body, or both. What are the main driving factors that govern on-site groundwater levels in the Water Table aquifer? Also, discuss the reason why the temporal variability of groundwater levels were reduced substantially during the year 2005 (Figure 2.4.12-6) compared to those before 2005 (Figures 2.4.12-4&5).

Staff Determination: **FORMAL RAI. A RESPONSE TO THIS QUESTION WILL BE INCORPORATED INTO THE RESPONSE TO QUESTION #19 BY APPLICANT**.

12. (SSAR Sections 2.4.12 & 2.4.13) The report describes that the outflow from Mallard Pond is at least 250 gpm (2.4.13-2, 3rd para.). Also Figures 2.4.12-4 & 5 show that groundwater heads in the water table aquifer vary significantly from year to year or even from month to month. These facts indicate that the water table aquifer is somewhat transmissible and interactive with surface water bodies, and that the groundwater travel times may be much faster than the applicant's estimates which are based on a steady-state mode. This issue should be clarified.

Staff Determination: **A RESPONSE TO THE FIRST PART OF THIS QUESTION (OUTFLOW FROM MALLARD POND) WILL BE ADDRESSED IN THE RESPONSE TO QUESTION #23 BY THE APPLICANT. THE LATTER PORTION OF THIS QUESTION IS RELATED TO QUESTION #11 AND WILL BE ADDRESSED UNDER THE RESPONSE TO #19.**

13. (SSAR Section 2.4.12) Discuss the process used to develop the site hydrogeologic conceptual model. Discuss of the various conceptual models considered in developing the final conceptual model, and how your model contrasts with the conceptual models of the Vogtle Electric Generating Station (VEGP), updated final safety analysis report (UFSAR), and USGS studies (Clarke and West 1997, 1998; Cherry 1996). Describe the datasets and rationale used to establish the final conceptual model. This discussion of the conceptual model should cover the continuity or discontinuity of the hydrologic units, their connectivity to the Savannah River and other surface water features.

Staff Determination: **CLOSED**

The safety-related aspect of this concern will adequately be addressed through ongoing environmental monitoring, such as the Radiological Environmental Monitoring Program (REMP). The REMP is described in ER Section 6.2. No additional information is needed. The process related portion of this issue will be addressed in response to issue #19.

14. (SSAR Section 2.4.12) Discuss data supporting the statement that the Utley Limestone member is not continuous beneath the ESP site and especially between the Powerblock and Mallard Pond.

Staff Determination: **A RESPONSE TO THIS QUESTION WILL BE COMBINED IN THE APPLICANT'S RESPONSE TO QUESTION #19.**

15. (SSAR Section 2.4.12) Discuss the Utley Limestone underlying the Vogtle Site including its composition and the presence or absence of Karst characteristics.

Staff Determination: **A RESPONSE TO THIS QUESTION WILL BE COMBINED IN THE APPLICANT'S RESPONSE TO QUESTION #19.**

16. (SSAR Section 2.4.12) Discuss the process used to conservatively bound the hydraulic properties (gradient, hydraulic conductivity, etc) currently, during construction, and during operation.

Staff Determination: **URGENT INFORMATION NEED**

A summary dataset utilizing data in both the SSAR and ER will be compiled that presents the bounding hydraulic properties of soil overlying the Blue Bluff Marl.

17. (SSAR Section 2.4.13) Please provide outflow measurements from the Mallard Pond, if any, as well as dam heights, widths and crest elevations of spillways of Mallard Pond as these data are important to determine the water budgets at the ponds. Discuss the way

of making regulatory releases at the new sites. Are they through the ponds or to the river directly?

Staff Determination: **CLOSED**

The quantity of flow passing through Mallard Pond is not recorded and no historical information on the discharge rate, other than the approximate 250 gpm cited in the VEGP UFSAR, is available. No additional data and information are available. All information supporting the 250 gpm rate will be provided in response to question #23b.

18. (SSAR Section 2.4.13) For the new plants, describe briefly the facilities to prevent accidental releases from radwaste tanks and piping systems to the surface and the ground water bodies. What are the failure modes of the radwaste tanks and pipes and scenarios under which accidental liquid radiological waste can be released, including points and likely locations of release?

Staff Determination: **FORMAL RAI**

Provide a response to this question, and include a discussion regarding how waste is transferred to the hold-up tank. Also, describe why the bounding failure occurred in the Auxiliary Building, and why the bounding scenario could not occur in the Radwaste Building.

19. (SSAR Section 2.4.13) Discuss the process used to establish that the conceptual model for the transport pathways and travel times presented in the SSAR represents the most conservative pathway from various other feasible alternative pathways.

Staff Determination Part 1: **URGENT INFORMATION NEED**

A separate calculation will be prepared that outlines four pathway scenarios. The bounding analysis will be further developed and used in the SSAR Section 2.4.13 analysis.

Staff Determination Part 2: **FORMAL RAI**

Provide a response to the process question (per question 19 and 13). Incorporate issues described in Items 11 (dynamic water table, source of water (rise), reasonableness of drainage (decline)), 14 (continuity of the Utley Limestone, and 15 (composition, integrity of the Utley Limestone relative to Huddlestun and Summerour 1996 report; presence or absence of Karst characteristics) into the discussion of the subsurface conceptual model.

20. (SSAR Section 2.4.13) Discuss the basis for the 0.12/0.25 ratio used to adjust the failed fuel rate.

Staff Determination: **CLOSED**

The basis for use of this ratio was provided by Westinghouse (see SSAR Section 2.4.13, Westinghouse 2006 reference). No additional information is needed.

21. (SSAR Section 2.4.13) Discuss the process used to evaluate the potential and impact of chelation and complexation agents (e.g. organic acids) to mix with radiological liquid effluents either within the facility or along the transport pathway in the environment outside the facility.

Staff Determination: **FORMAL RAI**

A response will be provided declaring if any chelation agents will be mixed with radiological liquid effluents within the facility.

22. (SSAR Section 2.4.13) Discuss the mapping of the top of Blue Bluff marl and estimated water table elevation.

Staff Determination: **CLOSED**

The requested information is contained in SSAR Figures 2.5.1-34 and -39, and in water table hydraulic plots that will be provided in response to question #10. The applicant stated that no evidence exists that might indicate a hydraulic connection between the unconfined and confined aquifers at the site. No additional information is needed.

23. (SSAR Section 2.4.13) (a) Discuss any measurements of the Mallard Pond outflow during the Tritium Study; (b) Discuss the process used to estimate the outflow to Mallard Pond (0.7 gpm)**;** and (c) Discuss the approximate retention time of Mallard Pond for a range of meteorological conditions.

Staff Determination Part 1: **CLOSED**

Georgia Environmental Protection Division (EPD) did not sample Mallard Pond during their Tritium Study. No additional information is available.

Staff Determination Part 2: **URGENT INFORMATION NEED**

The typographic error reporting a value of 0.7 gpm will be corrected to 0.07 gpm in the next revision of the SSAR. All parameters and assumptions used in the calculation of the 0.07 gpm rate (e.g. thickness of the aquifer units) will be provided. In addition, all parameters, measurements, and assumptions leading to the minimum flow estimate of 250 gpm for Mallard Pond will be provided.

Staff Determination Part 3: **CLOSED**

Discharge passing through Mallard Pond Dam is not, and has not, been recorded. The only discharge value is from the VEGP UFSAR, which states that outflow may be conservatively estimated at 250 gpm. No additional information is available.

24. (ER Section 4.5) Revision of the dose contribution to construction workers from gaseous effluents by using the XOQDOQ and GASPAR codes to calculate these doses instead of deriving these dose estimates from dose estimates to the maximally exposed member of the public.

Staff Determination: **FORMAL RAI**

25. (ER Section 4.5) Include the location, number of, and reading of the thermoluminescence dosimeter used to estimate the direct dose to construction workers.

Staff Determination: **FORMAL RAI**

26. (ER Section 4.5) Provide an estimate of the direct dose to construction workers working on Unit 4 from Unit 3.

Staff Determination: **FORMAL RAI**

27. (ER Section 5.4) ER Section 5.4 does not provide information used to model exposure pathways and does not include a listing of all input parameters in deriving dose estimates to members of the public.

Staff Determination: **FORMAL RAI**

27. (ER Section 5.4) ER Section 5.4 excludes potential exposure pathways (for liquid and gaseous effluents), with no basis provided for their omissions, such as boating, shoreline activity, crop and pasture irrigation, livestock watering, and goat milk production.

Staff Determination: **FORMAL RAI**

28. (ER Section 5.4) ER Section 5.4 does not explain why some nearby residences that are closer to the plant, than the one considered in the ER analysis, were not considered in assessing doses.

Staff Determination: **FORMAL RAI**

29. (ER Section 3.0 and 5.4) ER Sections 3.0 and 5.4 do not demonstrate compliance with liquid and gaseous effluent concentration limits of Part 20, Appendix B, Table 2, Columns 1 and 2.

Staff Determination: **FORMAL RAI**

30. (ER Section 3.5 and 5.4) ER Sections 3.5 and 5.4 list radiological effluent source terms that are different than that based on the AP1000 Design Control Document (Rev. 15).

Staff Determination: **FORMAL RAI**

31. (ER Section 5.4) ER Section 5.4.1.1 and Table 5.4-1 do not qualify the stated dilution factor as to the location of the dose receptor.

Staff Determination: **FORMAL RAI**

32. (ER Section 3.0 and 5.4) ER Tables 5.4-1, 3.0-1, and 3.1-1, and ER Figure 3.3-1 present inconsistent values for the cooling tower blowdown flow rates.

Staff Determination: **FORMAL RAI**

33. (ER Section 2.7.6, 5.4 and SSAR Section 2.3.5) The ER and SSAR present inconsistent information describing the basis of atmospheric dispersion data. See SSAR Section 2.3.5, ER Section 2.7.6, ER Section 5.4.1.2, and ER Tables 5.4-3 and 5.4-5.

Staff Determination: **FORMAL RAI**

34. (ER Section 2.7.6, 5.4 and SSAR Section 2.3.5) The ER and SSAR present inconsistent information for the designations of wind sectors and distances for the maximally exposed individual and nearest site boundary. See ER Section 5.4.1.2 and ER Tables 5.4-3 and 5.4-5, ER Section 2.7.6, and SSAR Section 2.3.5.

Staff Determination: **FORMAL RAI**

35. (ER Section 2.5, 2.9, 5.4) The ER presents inconsistent information for the size of the total population within the 50-mile radius used in assessing collective doses. See ER Section 5.4.3 and ER Table 5.4-10, ER Section 2.5.1 (Table 2.5.1-1), and ER Section 2.9 (Table 2.9-1).

Staff Determination: **FORMAL RAI**

36. (ER Section 6.2) SSAR Section 2.4.12 states that onsite ground water wells will be used as a source of potable water as well as supplying plant systems, but it does not describe how ground water from onsite wells will be monitored in ER Section 6.2 for the presence of radioactivity generated by plant operations.

Staff Determination: **FORMAL RAI**

37. (ER Section 6.2) ER Section 6.2 does not state whether the current REMP program would be augmented in light of the Nuclear Energy Institute (NEI) and nuclear utility initiative in response to the NRC's Liquid Radioactive Release Lessons Learned Task Force Report on contamination of ground and surface water (ADAMS Accession No. ML062650312).

Staff Determination: **FORMAL RAI**