

April 18, 2007

MEMORANDUM TO: Timothy Frye, Chief  
Health Physics Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

FROM: Sara Bernal, General Engineer - NSPDP */RA/*  
Health Physics Branch  
Division of Inspection and Regional Support  
Office of Nuclear Reactor Regulation

SUBJECT: SUMMARY OF MARCH 28, 2007, CATEGORY 2 PUBLIC MEETING  
WITH THE NUCLEAR ENERGY INSTITUTE (NEI) TO DISCUSS  
HEALTH PHYSICS ISSUES FOR NEW REACTORS

On Wednesday, March 28, 2007, a Category 2 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) staff and representatives of NEI at NEI Headquarters, 1776 I Street, Suite 400, Washington, D.C. The purpose of the meeting was to discuss new reactor health physics issues with NEI. A list of attendees is enclosed.

In opening remarks, Mr. Frye of the NRC staff provided a brief update on the status of several items related to health physics topics in new reactors, including Chapter 11 (source terms and waste management systems) and Chapter 12 (radiation sources and radiation protection) of the Standard Review Plan (NUREG-0800, March 2007), regulatory guide updates and prioritization, Requests for Additional Information (RAIs) for the ESBWR design application, Regulatory Guide 1.206 (Draft Guide DG-1145), Vogtle early site permit RAIs, construction inspection procedures, and the date when several members of the Office of Nuclear Reactor Regulation's health physics branch will transfer to the Office of New Reactors.

NEI asked for NRC comments and feedback on a proposed NEI guidance document entitled "Generic FSAR Template Guidance for Radiation Protection Program Description" (this document is available in the NRC's Agencywide Documents Access and Management System (ADAMS) as Accession No. ML071020206). NEI indicated that the intention of the guidance was to provide a complete generic radiation protection program description for use in developing construction and operating license (COL) applications. The document reflects, and is an extension of, the current NRC guidance, including Regulatory Guide 1.206 (Draft Guide DG-1145), "COL applications for Nuclear power Plants (LWR Edition)," and NRC and industry discussions of applicable standard review plan sections. NRC staff provided feedback on the document.

NEI's Design Centered Working Group (DCWG) presented information on construction and operating licence application (COLA) Chapter 11 topics of concern (presentation slides can be found in ADAMS as Accession No. ML071010078). Topics presented included the DCWG's thoughts on how Chapter 11 of a COLA could describe the Offsite Dose Calculation Manual (ODCM), including the Radiological Environmental Program (REMP) and the Process Control Program (PCP). Proposed equipment design descriptions and regulatory guidance related to

liquid and gaseous effluents releases and associated dose calculations were also discussed. NRC staff provided feedback on the presentation, while emphasizing that the sections of the COLA on Chapter 11 topics would need to present sufficient information and technical details for the staff to reach conclusions on regulatory compliance with reasonable assurance, as described in evaluation findings of the SRP. Industry representatives were encouraged by the NRC staff to provide as much information and technical details as is possible in light of the guidance of DG-1145. However, industry representatives noted that in many instances information on mobile and portable waste processing systems will not be available at the time that the COLA is submitted to the NRC, and that such information should be available by the time the ODCM and PCP documents and associated procedures are finalized. A deadline for the submittal of the completed ODCM, REMP, and PCP of 1 year prior to fuel loading was proposed as part of the DCWG presentation. NRC staff stated that the DCWG presentation was on the right track. However, NRC staff reminded NEI representatives that under 10 CFR Part 50.120 licensees have to establish, implement and maintain an operational training program 18 months prior to fuel loading. Because of the information it contains, the ODCM, REMP and PCP would have to be completed prior to designing the training program, which would conflict with the deadline the DCWG was proposing. NRC staff also indicated that the licensing process was uncertain at this time as to whether the approval of the ODCM, REMP and PCP would be a licensing action, and in the absence of that information, were unable to say whether the proposed submittal date would provide enough time for NRC review and resolution of NRC comments on the above noted documents, including the time to conduct site inspections of the installed systems and operating procedures, and confirm training of plant personnel.

NRC staff presented information on Regulatory Guide RG-1.206 (Draft Guide DG-1145) in particular indicating that sections of it would be posted on the NRC website for preliminary use starting the week of April 2<sup>nd</sup>, 2007. The staff stated that public comments on this regulatory guide would no longer be accepted. RG-1.206 will be formally issued following the publication of the final rulemaking for combined license applications.

The meeting ended with a discussion on the status of Draft Guide DG-4010 (Regulatory Guide RG-4.15) "Quality Assurance for Radiological Monitoring Programs (Inception through Normal Operations to License Termination) - Effluent Streams and the Environment." NRC staff from the Office of Research summarized the changes that had been incorporated into the new version of RG-4.15, and reassured members of the industry that the regulatory guide had been issued for an additional 60 days of public comment in response to feedback from NEI. During the 60 days of public comment, it was suggested that operating reactor licensees evaluate their current programs against the revised RG-4.15 or they could make and submit additional comments. NRC staff emphasized that operating reactors could continue to follow the previous version of RG-4.15, but all new reactors would have to use the revised version of RG-4.15. Industry expressed dissatisfaction at having to implement two different Quality Assurance programs at sites where a new reactor would be built alongside one or more operating reactors. Difficulty in implementing the changes required under the new guidance also caused some concern. However, no technical comments or objections were identified by the attendees. The public was invited to attend the meeting. No Public Meeting Feedback forms were received.

The next public meeting to discuss new reactor health physics topics will be held on May 10, 2007.

T.J. Frye

-3-

Enclosure:  
List of Attendees  
Meeting handouts

cc w/encl: See next page

T.J. Frye

-3-

The public was invited to attend the meeting. No Public Meeting Feedback forms were received.

The next public meeting to discuss new reactor health physics topics will be held on May 10, 2007.

Enclosure:  
List of Attendees  
Meeting Handouts

cc w/encl: See next page

DISTRIBUTION:

L. Quinones  
M. Vaaler  
T. Kevern  
T. Frye  
J. Dehmel  
C. Hinson  
G. E. Powers  
PUBLIC  
PMNS  
IHPB R/F  
A. Cabbage  
RidsNrrAdro  
RidsNrrDirs  
RidsOpaMail  
RidsOgcMailCenter  
RidsAcrcAcnwMailCenter  
RidsDirslhpb  
RidsNrrAdes  
RidsNrrAdra  
Nrr\_Dirs\_Ihpb Distribution  
RAnderson, internet: rla@nei.org

ADAMS Package Accession Number: ML071020327  
Meeting Notice Accession Number: ML070750078  
Meeting Handout Accession Numbers: ML071020206, ML071010078  
Meeting Summary Accession Number: ML071020329

OFFICE	IHPB/HP	IHPB/BC	
NAME	SBernal	TFrye	
DATE	4/16/07	4/18/07	

OFFICIAL RECORD COPY

**Public Meeting with the Nuclear Energy Institute (NEI)  
Discussion of New Reactor Health physics Issues**

**March 28, 2007  
Meeting Attendees**

<b>Name</b>	<b>Organization</b>
Tim Frye	NRC
Jean-Claude Dehmel	NRC
Charles S. Hinson	NRC
Roger Pedersen	NRC
Sara Bernal	NRC
Karen Kim	EPRI
Sean Bushet	EPRI
George Oliver	NEI
Cal Reid	Bechtel
Leslie Kass	NEI
Russ Bell	NEI
Fred Rippee	GE
Milton Rejcek	STPNOC units 3/4
Dave McCullough	GE
Ronald J Shippee	Unistar/Areva
Patrick W. Daly	Exelon/Braidwood
Larry E. Hagnes	Duke Energy/Corp
Paul Mothena	Southern California Edison
Charles Pierce	Southern Nuclear
Richard Ely	Enercon Services
Neil Haggerty	NuStart
Thomas Hicks	NuStart
Ralph Andersen	NEI
Amy Cubbage	NRC/NRO
Lauren Quinones-Navarro	NRC/NRO
Bill Reckley	NRC/NRO
Marlayna Vaaler	NRC/NRO

Nuclear Energy Institute

cc:

Mr. Anthony Pietrangelo, Vice President  
Regulatory Affairs  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

Mr. H. A. Sepp, Manager  
Regulatory and Licensing Engineering  
Westinghouse Electric Company  
P. O. Box 355  
Pittsburgh, PA 15230-0355

Mr. Jack Roe  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

Mr. Charles B. Brinkman  
Washington Operations  
ABB-Combustion Engineering, Inc.  
12300 Twinbrook Parkway, Suite 330  
Rockville, MD 20852

Mr. Gary L. Vine, Executive Director  
Federal and Industry Activities, Nuclear  
Sector  
EPRI  
2000 L Street, NW, Suite 805  
Washington, DC 20036

Mr. Pedro Salas  
Regulatory Assurance Manager - Dresden  
Exelon Generation Company, LLC  
6500 N. Dresden Road  
Morris, IL 60450-9765

Ms. Barbara Lewis  
Assistant Editor  
Platts, Principal Editorial Office  
1200 G St., N.W., Suite 1100  
Washington, DC 20005

Mr. Gary Welsh  
Institute of  
Nuclear Power Operations  
Suite 100  
700 Galleria Parkway, SE  
Atlanta, GA 30339-5957

Alexander Marion, Executive Director  
Nuclear Operations & Engineering  
Nuclear Energy Institute  
1776 I Street, NW, Suite 400  
Washington, DC 20006-3708

Mr. James H. Riley, Director  
Engineering  
Nuclear Energy Institute  
Suite 400  
1776 I Street, NW  
Washington, DC 20006-3708