

June 5, 2007

MEMORANDUM TO: Timothy Frye, Chief
Health Physics Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors

FROM: Sara Bernal, General Engineer - NSPDP */RA/*
Health Physics Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors

SUBJECT: SUMMARY OF MAY 10, 2007, CATEGORY 2 PUBLIC MEETING
WITH THE NUCLEAR ENERGY INSTITUTE TO DISCUSS HEALTH
PHYSICS ISSUES FOR NEW REACTORS

On May 10, 2007, the Nuclear Regulatory Commission (NRC) staff met with members of the Nuclear Energy Institute (NEI) to discuss new reactor health physics issues with NEI. The meeting took place at NRC headquarters located in Rockville, MD. Enclosure 1 lists the meeting attendees.

A public meeting notice was issued on April 30, 2007, and was posted on the NRC's external (public) web page (Agencywide Document Access Management System (ADAMS) Accession No. ML071160039). The notice included the meeting agenda, which was also available as a handout at the meeting. The discussions included:

- (1) Design certification lessons learned,
- (2) Proposed industry radwaste cost benefit analysis, and
- (3) Update on the status of draft guide 4012, "Minimization of Contamination and Radioactive Waste Generation in Support of Decommissioning."

After brief opening remarks, NRC staff provided an overview of high-level "lessons learned" gathered during past and present design certification reviews, including:

- (1) Unclear status of Requests for Additional Information (RAIs) due to problematic bookkeeping by both industry and the NRC.

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- (2) Design Control Document (DCD) modifications, made in response to current RAIs, deleting or impacting DCD modifications made in response to previous RAIs.
- (3) RAI responses referencing other RAI responses that have not yet been received by the NRC.
- (4) DCD chapters not referencing other DCD chapters where more detailed relevant information is available to assist the technical reviewer.
- (5) Combined Operating License (COL) action items not being explicitly called out as such in the DCD.

Additional "lessons learned" presented by NRC staff can be found in ADAMS (Accession Numbers ML071410117 and ML071410120).

Following the NRC staff presentation on design certification lessons learned, NEI representatives introduced a proposed industry method for performing the radwaste cost benefit analysis required by 10 CFR 50 Appendix I, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As Low As Is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactors." NEI also discussed their desire to submit the new method to the NRC as a generic alternative to the approach described in Regulatory Guide 1.110, "Cost Benefit Analysis for Radwaste Systems for Light-Water-Cooled Nuclear Power Plants." If endorsed by the NRC, future COL applicants could reference the submittal to meet the Appendix I radwaste cost benefit analysis requirement. NRC staff agreed to contact NEI at a later date regarding the best way to document and submit the proposed alternative method for NRC review.

NRC staff presented information on the status of Draft Guide DG 4012, "Minimization of Contamination and Radioactive Waste Generation in Support of Decommissioning." A summary of the information presented can be found in ADAMS (Accession No. ML071410123). The purpose of the draft guide is to provide industry with NRC approved methods of meeting the requirements of 10 CFR 20.1406, "Minimization of Contamination." DG 4012 is on schedule to be issued for public comment in July 2007.

Industry representatives responded to the presentation on DG 4012 by stating that, with respect to 10 CFR 20.1406 implementation, there continues to be confusion about what kind of information NRC staff would like to see in COL applications. NRC staff pointed out that future applicants should follow the guidance contained in an NRC memorandum entitled "List of Decommissioning Lessons-Learned in Support of the Development of a Standard Review Plan for New Reactor Licensing" (Accession No. ML062620355). This memorandum is referenced in the Standard Review Plan (NUREG 0800) and is serving as a placeholder until DG 4012 is finalized.

Industry expressed further concerns about the level of detail required at the time of licensing to describe the applicant's radioactive waste management systems. Industry representatives emphasized that the information requested by the NRC would require detailed engineering work that would not be complete at the time of COL application submittal. NRC staff said that they understood, but that certain information was needed at the time of COL application submittal in order for the staff to make a reasonable assurance determination that the plant will operate in

T. Frye

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conformity with its license, the Atomic Energy Act, and the Commission's regulations. To address the lack of engineering detail, NRC staff suggested that each document providing information on the radioactive waste management systems be split into two groups: items that are known and those items that are not known. Nominal, or best estimates, should be provided for undefined system specifications or parameters at the time of COL application submittal until actual values are finalized and documented based on installed and tested plant systems and components.

The discussion on Regulatory Guide 1.206 Chapters 11 and 12 was tabled until the next meeting, to be held on June 6, 2007.

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

Enclosure:

List of Attendees

Meeting Handouts

cc w/encl: See next page

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The discussion on Regulatory Guide 1.206 Chapters 11 and 12 was tabled until the next meeting, to be held on June 6, 2007.

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

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Meeting Handouts

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Meeting Summary Accession Number: ML071550012

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

**May 10, 2007
Meeting Attendees**

Name	Organization
Tim Frye	NRC
Jean-Claude Dehmel	NRC
Charles S. Hinson	NRC
Sara Bernal	NRC
Mark Paul	Dominion/COL Project
Yumi Kawanago	MNES (Mitsubishi)
Pedro Salas	AREVA
Ralph Anderson	NEI
George Oliver	NEI
Steven Schaffer	NRC
Deann Raleigh	LIS, Scientech
Cal Reid	Bechtel
Marlayna Vaaler	NRC
Gene Imbro	NRC
Glenn Tracy	NRC
Ron Shippee	Areva/Unistar
William Ott	NRC
Harold Rothstein*	Washington group International
Michael Waselus*	Worleyparsons Group
Gerald Lahti*	Washington Group International

* By telephone.

ENCLOSURE

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