

September 24, 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 AUGUST 30, 2007, CATEGORY 2 PUBLIC MEETING  
WITH THE NUCLEAR ENERGY INSTITUTE TO DISCUSS HEALTH  
PHYSICS ISSUES FOR NEW REACTORS

On August 30, 2007, the Nuclear Regulatory Commission (NRC) staff met with members of the Nuclear Energy Institute (NEI) to discuss new reactor health physics issues. Enclosure 1 lists the meeting attendees.

A public meeting notice was issued on August 18, 2007, and was posted on the NRC's external (public) web page (Agencywide Document Access Management System (ADAMS) Accession No. ML072270646). The notice included the meeting agenda, which was also available as a handout at the meeting. The discussions included:

- Offsite Dose Calculation Manual (ODCM) and Radwaste Cost Benefit Analysis Template Development
- Implementation of Regulatory Guide 4.15, Revision 2, at Co-Located Sites
- Industry Approach for Addressing 10 CFR 20.1406 in Combined License Applications

NEI representatives presented two draft templates developed for use by Combined Operating License (COL) applicants. They were "NEI 07-11 Generic FSAR Template Guidance for Cost-Benefit Analysis for Radwaste Systems" (ML072430796) and "NEI 07-09, Generic FSAR Template Guidance for ODCM Program Description" (ML072430775). The NRC staff provided feedback to NEI on what was an acceptable level of detail for each template. In response to NRC comments, NEI representatives raised a concern about the possibility of a COL holder wanting to change an operational program description after COL issuance. What regulatory process would the COL holder have to follow in this instance and would such a change require a license amendment? The NRC staff agreed to provide an answer to the question at the next public meeting.

NEI representatives also presented their concerns regarding the implementation plan described in the recently issued Regulatory Guide (RG) 4.15, Revision 2, "Quality Assurance for Radiological Monitoring Programs." NEI concerns included: inconsistent implementation (only new reactor applicants appeared to be restricted from using revision 1 of the Regulatory Guide); no technical basis for the revision (revision 1 is still considered technically adequate to meet regulatory requirements); and the high cost of implementing two different QA programs, or converting an existing reactor, at co-located sites. NEI asked the NRC staff to consider allowing COL applicants to choose which revision of RG 4.15 they would implement. They also asked that the NRC staff provide industry with a final policy position on the implementation of RG 4.15, as soon as possible, so that COL applicants could move forward with their submittals. The NRC staff agreed to provide an answer within the next few weeks. NRC staff also committed to providing industry with a summary of the long-term benefits of using the revised RG 4.15. NEI representatives agreed that this would give industry a better understanding of the benefits of using the revised RG.

NRC staff presented information on the level of detail with which COL applicants would be expected to address the requirements of 10 CFR 20.1406 in their license applications. NRC staff stated that in addition to referring to the recently issued Draft Guide DG 4012, applicants would be expected to provide a general description of plant design and operational program attributes that demonstrate compliance with the regulation. NEI representatives pointed out that industry would be better able to describe the details of their compliance with 20.1406 several years from now, when the detailed plant engineering work would begin. In addition, Industry wished to focus on complying with 20.1406 instead of complying with the "checklist" of items which were currently in DG 4012. Finally, NEI asked that NRC defer 20.1406 reviews until after DG 4012 was adopted in final form, and requested that a workshop be conducted when DG 4012 was finalized.

The public was invited to attend the meeting. Public Meeting Feedback forms were not received.

Enclosure:  
List of Attendees  
Meeting Handouts

cc w/encl: See next page

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cc w/encl: See next page

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| OFFICE | NRO/DCIP/CHPB | NRO/DCIP/CHPB (BC) |
|--------|---------------|--------------------|
| NAME   | SBernal:hpm1  | TFrye              |
| DATE   | 09/21/07      | 09/24/07           |

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

**August 30, 2007  
Meeting Attendees**

| <b>Name</b>        | <b>Organization</b> |
|--------------------|---------------------|
| Richard Ely        | Enercon Services    |
| J. Stewart Bland   | Chesapeake Nuclear  |
| Pedro Salas        | Areva               |
| William E. Smith   | Southern Nuclear    |
| Edward Roach       | NRC                 |
| Charles Hinson     | NRC                 |
| Jean Claude Dehmel | NRC                 |
| George Cicotte     | NRC                 |
| Steven Schaffer    | NRC                 |
| Tim Frye           | NRC                 |
| Ralph Andersen     | NEI                 |
| Sara Bernal        | NRC                 |
| Andrea Johnson     | NRC                 |
| Milton Rejcek*     | STPNOC              |
| Philip Shultz*     | SCANA               |
| Ron Shippee*       | UNISTAR             |
| Mark Strum*        | Areva               |
| Jo Ann Pelczar*    | Areva               |
| Gordon Williams*   | STPNOC              |

\* By Telephone

ENCLOSURE

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