

NRC comments on ALARA template NEI 07-08  
December 13, 2007 Public Meeting

After a followup review of the NEI 07-08 [draft revision 1] "Generic FSAR Template Guidance for Ensuring That Occupational Radiation Exposures Are as Low as Is Reasonably Achievable (ALARA), revision 0, I would make the following additional comments:

**NEI 07-08 Comment-1.** The general layout of the NEI template is different than NEI 07-10 (PCP), in that it does not state that the "COL or license applicant or licensee should designate,....., identify, define, establish, describe, etc...(see page 7 or 8, of 07-08). It just says

It needs to state what the applicant should establish to conform to the guidance and template.

**NEI 07-08 Comment-2** NEI template does not specify any guidance (RG 8.8) for ALARA review of new or modified designs and equipment selection (See RG 8.8 C.1.d.) or direct the applicant where in the COL/DC it should be described.

How should the applicant describe the process/program for reviews of new or modified designs and equipment selection. (e.g.-Has the applicant reviewed the design to identify flushing connections to mitigate crud build-up.)

**NEI 07-08 Comment-3** NEI template does not discuss the need to establish configuration controls on temporary shielding installation to prevent a violation of the analyzed stresses on components.

Where would the licensee/applicant describe such controls?

**NEI 07--08 Comment-4** NEI template page 8, eighth bullet, refers to general area radiation levels that are greater than 1.5rem/h or when an individual exposure is expected greater 500mrem per entry that stay times are considered. Don't RWP's describe stay time requirements?

Why aren't stay times required for entries greater than 1000 mrem/h?(RG 8.38, rev. 1, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants", page 7, section 2.4, Alternative Methods for Access Control second paragraph from the bottom of the page)

Comment on third bullet from the bottom, .should be " outside of posted radiation areas or in lower radiation level areas.

reason: underlined to clarify location meaning.