

Nuclear Institute Energy (NEI) Update to NEI 07-11 (Draft Revision 1)
Generic FSAR Template Guidance for Cost-Benefit Analysis for Radwaste Systems

The template was developed in accordance with the prescribed criteria and methodology in 10 CFR Part 50, Appendix I, Section II.D, and Regulatory Guide 1.110 (March 1976). Regulatory Guide 1.110 is endorsed without qualification or exceptions in Regulatory Guide 1.206 and NUREG 0800 (Standard Review Plan) as providing a method acceptable to the staff for demonstrating compliance with 10 CFR Part 50, Appendix I, Section II.D.

Revision 0 of the template was submitted to the NRC on September 28, 2007. NRC provided comments on the template in a public meeting on November 13, 2007. The template is being updated as described below and will be resubmitted as Revision 1 in February 2008.

The numerical references shown in parentheses below correspond to the numbered preliminary comments provided by NRC on November 13 (ML073400046).

(1-3) These comments simply reflect staff observations about the template and no changes are being made in response to them.

(4) The template is being revised to better clarify that the background information (taken from an NRC document) regarding currently operating nuclear power plants is included solely to provide a context for developing a generic template to address new construction and operating license (COL) applications. To the extent practical, the data will be expanded to express radiological impacts on a per unit basis.

(5) The template will be revised to clarify that the analysis is intended to be of a bounding nature and therefore conservative assumptions are used, including the assumption that each radwaste equipment augment included in Regulatory Guide 1.110 would have the effect of completely (100%) reducing the respective gaseous or liquid radiological effluent. The template will include an explanation that actual performance may be equal to (e.g. in the case of radioiodines) or much less than (e.g., in the case of tritium) the 100% reduction that is assumed for the purpose of conducting a bounding analysis.

(6-7) These comments call for additional information and analysis that, in effect, reflects an evaluation of the regulatory guide itself. While the comments may be pertinent to an NRC staff evaluation of if and how the regulatory guide might be updated in the future, they are considered to be outside the scope of what is needed to reach a reasonable assurance conclusion in the context of a COL application. No changes will be made to the template in response to these comments.

(8) Comments a, b, and e will be addressed in the update to the template. Comments c and d are viewed as outside the scope of the purpose of the template.