

Lessons Learned from the Acceptance Reviews of Reference and  
Subsequent COLAs for SAR Chapters 11 and 12  
January 29, 2008 Public Meeting with NEI on New Reactor HP Issues

Overall the COL applications have addressed all regulatory requirements and have been technically sufficient to begin our detailed technical review.

However, the following are examples of areas where information will require RAIs:

1. The COL applicants should spend time making sure they describe where each FSAR section provides the information required by 10CFR52 and RG 1.206.
  - **Example 1:** compliance with 20.1406 is an acceptance criterion for SRP Chapter 11 and Section 12.5, where operational procedures to reduce contamination should be described. In some applications this information has been omitted. Having wording in 11.2 that refers the reader to the template (or another section of the FSAR) would be acceptable.
  - **Example 2:** Compliance with 20.1301(e), where the applicant has to demonstrate compliance with EPA general radiation protection standard in 40 CFR 190, is an acceptance criterion in SRP sections 11.2 and 11.3 for the Safety Analysis Report (SAR). In some applications this information has been omitted, although compliance has been demonstrated in the Environmental Report.
2. COL applicants should make sure to fully and clearly explain each approach or methodology used, and to provide supporting references for methodologies (or numbers) provided in the application.
  - **Example 1:** Applicants have provided the values of the parameters they used for the individual and population dose modeling in SAR Chapter 11, but omitted any justification for the values or references where these values come from.
  - **Example 2:** Applicants have provided the dose calculations for site pathways in SAR Chapter 11, but omitted an explanation why these pathways were included and others excluded.
3. COL applicants should make sure to provide all site specific information required by the SAR chapter 11 and 12 operational program templates

- **Example 1:** COL applicants have referenced the Radiation Protection Program template NEI 07-03 without providing the site specific information called out in the template.

4. COL Applicants should ensure that the application is consistent with LWMS and SWMS performance or characteristics described in DCDs.

- **Example 1:** DCDs offer the optional use of supplemental mobile processing subsystems to be selected by the COL applicant. However, the DCD is not clear as whether the performance characteristics of such mobile subsystems will match that specified in DCD.