

Suggested additions/changes to NEI Template 07-03  
“Generic FSAR Template Guidance for Radiation Protection Program Description”  
Revision 1 (February 11, 2008)

1. Issue: There is currently no mention in the template about the meaning of the bracketed “Notes” in the body of the template.

Suggested fix: Add a new paragraph at the beginning of the template entitled “Incorporation of this template by reference by a COL applicant.” In this paragraph, state that the template includes several bracketed “Notes” which are to be used by the COL applicant to provide site-specific data pertaining specifically to the reference COL applicant. In this new paragraph, you may want to identify the specific section numbers where each of these bracketed “Notes” occur in the template.

2. Issue: Some of the types of ALARA methods discussed in Section 12.5.4.2, “Methods to Maintain Exposures ALARA”, of the draft template are very specific and may differ from the actual ALARA methods used by a COL applicant which would reference this template.

Suggested fix: Although the introduction to Section 12.5.4.2 states that the ALARA methods listed are “some *examples* (emphasis added) of the types of methods that will be used to maintain exposures ALARA”, by the way the ALARA methods are worded in the draft template, it could be easily inferred that a COL applicant referencing the NEI 07-03 template will commit to using the specific ALARA methods described in Section 12.5.4.2 of the template.

One possible fix would be to make Section 12.5.4.2 a bracketed “Notes” section and have each COL applicant which references the NEI 07-03 template provide their own site specific list of methods (for the eight categories listed in Section 12.5.4.2) used to maintain exposures ALARA. If the methods used by the COL applicant do not differ significantly from the methods described in the template, then the COL applicant can just state that the methods listed in the template will apply to the COL applicant’s program.

3. Issue: Similar to Issue 2 above, in addition to the bracketed “Notes” sections and Section 12.5.4.2 (Methods to Maintain Exposures ALARA), there may be other sections of the template which may describe parts of the radiation protection program (e.g., organization, facilities, instrumentation and equipment, or procedures) that may differ, in some respects, from similar parts of the COL applicant’s radiation protection program.

Suggested fix: Add words at the beginning of the template stating that in those areas where the COL applicant’s radiation protection program differs from the program described in the template, the COL applicant must identify these departures or differences from the material described in the template.

4. Issue: Tables 2 and 3 of RG 1.97 (Rev. 3) list a Type E portable radiation monitor that can be used for post-accident measurement of airborne radiohalogens and particulates for the purpose of estimating release rates of radioactive materials released during an accident. It is not clear if the list of portable monitoring instrumentation and equipment provided in Section 12.5.3.2 of the draft template

includes a listing of a portable radiation monitor(s) that can be used to make these types of post-accident measurements.

Suggested fix: Modify Section 12.5.3.2 (under the heading Portable Monitoring Instrumentation and Equipment) to add a listing of a Type E portable radiation monitor(s) that can be used for post-accident measurement of airborne radiohalogens and particulates for the purpose of estimating release rates of radioactive materials released during an accident (to specified in Tables 2 and 3 of RG 1.97 (Rev. 3)). (Note: If this type of monitor is described elsewhere in the COL application, state what section of the COL application contains a description of this monitor type).

5. Issue: The draft template currently makes reference to Revision 4 of RG 1.97. Revision 4 of RG 1.97 does not contain the BWR or PWR variables (and corresponding footnotes) for post-accident area radiation and airborne radioactivity monitors contained in Tables 2 and 3 of Revision 3 of RG 1.97. (Note: Since the fixed area and airborne radioactivity monitors listed in Tables 2 and 3 Revision 3 of RG 1.97 are described elsewhere in the DCD (e.g. in Chapters 11.5 and 12.3), this template should only make reference to those portable monitors listed in Tables 2 and 3 of Revision 3 of RG 1.97 used for post-accident monitoring of radiation levels and portable sampling of airborne radiohalogens and particulates).

Suggested fix: Modify the draft template to state that the template will reference Revision 4 of RG 1.97 as applied by the COL applicant using the guidance provided in SRP BTP 7-10 (Revision 5) (NUREG 0800). Use of the guidance provided by this BTP will permit COL applicants using Revision 4 of RG 1.97 to use the ranges and footnotes for radiation instrumentation that are provided in Revision 3 of Regulatory Guide 1.97.

In the References Section of the template, separate references should be made to Revision 4 of RG 1.97, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants," and SRP BTP 7-10, "Guidance on Application of Regulatory Guide 1.97" NUREG-0800.

6. Issue: In Section 12.5.4.2, "Methods to Maintain Exposures ALARA", the bracketed "Notes" section under Refuelings describes ALARA practices for boiling water reactor applications only.

Suggested fix: This section should be amended to also contain a description of ALARA refueling practices for pressurized water reactor applications.

7. Issue: Numerous word and editorial changes should be made to the draft template.

Suggested fix: See marked-up pages of draft template.

8. The text in NEI 07-03 should be consistent with the text in NEI 07-08.

9. Issue: In Section 12.5.3.1, "Facilities", (page 8) the Radiochemistry Laboratory, specifically the laboratory/counting room facility and instrumentation, are to be sufficiently shielded to maintain low background radiation levels to permit analysis of samples during routine and accident conditions. The COL applicant should provide

site-specific or design specific information which supports this capability consistent with the guidance in NUREG-0737, Item II.B.3

Suggested fix: This section should be amended to either contain a description of the ALARA analysis which demonstrates this capability or reference the design application information where it is listed (e.g., Table or Figure in Design Certification Document).