

NRC Preliminary Comments on NEI Template 07-03, Revision 5
“Generic FSAR Template Guidance for Radiation Protection Program Description”

1. The inclusion of a bracketed “Note” in the template means that a COL applicant referencing the template must include supplemental information in the FSAR to address the information described in the bracketed Note. The use of the bracketed “Note” in Section 12.5.2.4 (page 6) does not meet this criteria for requesting additional information.

Suggested fix: Remove the word “Note” in Section 12.5.2.4 (page 6) and reword the sentence in brackets to state that the COL applicants may modify the list of radiation protection technician responsibilities listed in the template based on company and site-specific information.

2. In Section 12.5.3.1, “Facilities” (page 8), the section describing the laboratory/counting room facility and instrumentation (part of the Radiochemistry Laboratory) implies that the guidance in NUREG-0737, Item II.B.3 applies to the area where post-accident samples are to be counted and analyzed (i.e., the laboratory/counting room facility). NUREG-0737, Item II.B.3 applies only to the sampling line system areas where the post-accident samples are to be drawn from.

Suggested fix: Modify the wording in Section 12.5.3.1 (page 8) to state that NUREG-0737, Item II.B.3 applies only to the sampling line system areas where the post-accident samples are to be drawn from.

3. The use of the bracketed “Note” in Section 12.5.3.3 (page 12) does not meet the criteria for requesting additional information described in RAI #1 above.

Suggested fix: Remove the word “Note” in Section 12.5.3.3 (page 12) and replace the word “applicant” with “COL applicants”.

4. In response to an earlier staff comment (submitted to NEI as comment number 6 on February 11, 2008), NEI modified the information under the heading “Refueling” (Section 12.5.4.2, “Methods to Maintain Exposures ALARA”) so that the heading referred to all reactor types instead of only BWRs. The revised wording is unclear and deleted some of the information contained in the original text.

Suggested fix: Replace the second and third sentences under the heading “Refueling” in Section 12.5.4.2 (page 15) to read, “Prior to and during refueling, the refueling pool water is continually purified in order to maintain exposures from activity in the water ALARA. During refueling operations, irradiated fuel assemblies are maintained underwater at all times.”

Editorial RAIs:

1. (Page 12, Section 12.5.3.2) In the last bullet under the heading “Portable Monitoring Instrumentation and Equipment”, the sentence should have a single period instead of two.

2. (Page 15, Section 12.5.4.2) Add a period at the end of the fourth sentence (after the word “progress”) under the heading “Refueling”.
3. (Page 19, Section 12.5.4.4) Eliminate the large space gap on page 18 by relocating Section 12.5.4.4 to page 18.
4. (Page 19, Section 12.5.4.4) Add a period after the word “escort” in the 4th line from the bottom of page 19 and begin the following sentence with “The designated...”
5. The References section of Revision 5 (page 27) has the incorrect title for Revision 4 of Regulatory Guide 1.97. The correct title is “Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants.”