

**Preliminary comments on NEI 08-08 [Draft revision 0], Generic FSAR Template
Guidance for Life Cycle Minimization of Contamination**

Section	Page	Comment or question	Reviewer	Resolved (yes /no)
General	n/a	Template appears to focus on “design” features when the intent was to address the operational guidance aspects of RG 4.21, if the DCD did not address those features	CH/JCD/EHR	
General	n/a	The template needs to address surface water. In many instances, surface water is also impacted after spills and leaks. Also, some systems can leak directly into surface water and have little or no impacts on ground water.	JCD	
1	1	The section should address NEI 07-07(Ref 3) in more detail since NEI 08-08 makes frequent reference to it.	CH	
1	1	There should be an upfront section that indentifies the relevant elements of RG .4.21 and NEI 07-07, and then explain why these are important in the context of this template. They should be ranked in order of applicability and importance. In referencing the objectives of NEI 07-07 (GWPI), there are a need to discuss why these specific objectives were selected and how do they address these particular portions of the life-cycle of a plant. The template should also acknowledge and discuss the implications of RIS 2008-03 on previously discharged radioactive effluents.	JCD	
1	1	3 rd paragraph discusses consideration of RG 4.21 A following sentence in the same Para, states that; “... a COL applicant’s program consistent with this guidance document is an acceptable alternative to RG 4.21.” Which elements or concepts were not considered from RG 4.21? Why were these elements not considered? Insert “NEI 08-08, Rev 0” in place of “this guidance document”, for clarification	EHR	
1	1	Please discuss in Section 1, that where design features do not exist to minimize contamination, as practicable, the COL applicant should describe operational programs, processes, and/or procedures which address the element or concept.	EHR	
3.1.1	3	The information in the double parentheses in Section 3.1.1 is not needed since this template applies to all of these facilities.	CH	

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3.1.1 et al	3	The information under “Note” in each of these sections should be in bold letters to be consistent with the information in the “Note” in Section 3.2.1. (Fonts are inconsistently used in Appendices)	CH/EHR	
3.1.4	3	The discussion on SSC needs to include condensate storage tanks; as such tanks can contain several hundred of thousand gallons of radioactive water.	JCD	
3.1.4	3	The information in the double parentheses states that the applicant should identify the design features based on the risk of the potential for contamination. This should state that all or most design features should be listed, ranked by risk. The current wording implies that the applicant can determine the risk and arbitrarily list only those features that have the greatest risk for potential contamination (i.e., where is the risk cutoff?).	CH	
3.1.4	3	The discussion on SSC needs to address the use of temporary liquid and solid waste processing systems and their operations and how leak/spill prevention would be integrated into overall precautionary measures. (Should such systems be installed in bays or cubicles with sumps and steel liners? If not, how should such needs be identified and what types of protective measures should be considered (e.g., temporary waste processing skids)?	JCD	
3.1.4	3	Work practices should be described (or identified in a procedure or program where the actions are controlled) in a manner which addresses how they will evaluate all SSCs or site specific features.	EHR	
3.1.4.a	3	The double parentheses should tell the COL applicant to provide a listing of the <u>DCD sections</u> (see Appendix B) that describe the design features, not the features themselves.	CH	
3.1.4	3	The discussion on SSC needs to include condensate storage tanks; as such tanks can contain several hundred of thousand gallons of radioactive water.	JCD	
3.1.4 b-f	4	There are no apparent site-specific items addressing these details or referencing a procedure which will contain these details.	EHR	

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3.1.4 b-f	4	Items b through f asks the applicant to identify methods, enhancements, etc. If these items are not in double parentheses, then how will NRC staff to determine the methods, enhancements, etc. selected by the COL applicant?	CH	
3.2	4	The discussion should clearly define the boundary of plant systems, e.g., LWMS and SWMS, etc. For example, the boundary of the LWMS begins at the interface from plant systems provided for the collection of process streams and radioactive wastes to the point of controlled discharges to the environment or point of recycling to primary or secondary water system storage tanks. The discussion should note that releases of radioactive material (as liquids, etc.) outside of these defined boundaries are unmonitored and uncontrolled releases and that it is the purpose of this template to identify precautionary measures. See guidance of Regulatory Guide 1.143 for more details.	JCD	
3.2.2	4	In selecting the placement of monitoring wells, one should note that the boundary defined in the FSAR is not necessarily the one that would be defined by a GW/SW site conceptual model. Established release points described in the FSAR may be, in part, irrelevant since the objective is to locate wells at locations where SW/GW flows are governed by different flow regimes.	JCD	
3.2.2.c	5	The discussion needs to be expanded to address possible changes in the scope of environmental media being sampled, and recognize that the suite of radiological analyses and detection limits may change as well. The point about dispute resolution is too negative. Shift the argument to point out that these issues need to be addressed to ensure a common understanding of sample results and consistent interpretation of results when compared to NRC limits and other acceptance criteria.	JCD	
3.3	5	Section lacks site-specific brackets for COL applicant to describe either the site specific items or where programs containing the protocol/aspects of Section 3.3.2 are addressed.	EHR	
3.3.2.c	5	Last sentence in this item is confusing and unclear.	CH	

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3.4.3	6	Lacks site specific brackets or information. How will the operational ALARA program do this? See NEI 07-08, the focus is operational health physics, with minor references to contamination control.	EHR	
3.5	6	The seven lines of text are insufficient coverage of the topics	JCD	
3.5.1	6	Lacks site specific brackets or information	EHR	
3.5.2	6	Lacks site specific brackets or information	EHR	
4.1	6-7	NRC will solicit input from hydrology branch	EHR	
4.1.5	7	Explain what is meant by "substantial" in items a-d.	JCD	
4.2		The four lines of text are insufficient coverage of the topics.	JCD	
4.2	7	There are no site specific brackets or references to actual PM or surveillance programs the COL applicant should implement.	EHR	
4.3.3	8	The protocol for response to leaks and spills should be site specific, reference 3.3.2 and 3.5.2, neither reference site specific brackets.	EHR	
5	8	The discussion needs to consider the guidance of NUREG-1757, especially those addressing the historical site assessment process in reconstructing past operational practices and events, recognition of the needs to conduct scoping and characterization surveys to make up for incomplete or lost data, etc.	JCD	
5	8	If decommissioning is invoked in addressing residual levels of radioactivity, then one needs to refer to the criteria of Part 20.1402. Similarly, the discussion could note that the annual dose limit of 25 mrem/0.25 mSv could be applied in deriving an interim cleanup criterion before the onset of decommissioning.	JCD	
5.1.1	8	Decommissioning is described in Env. Report of COL applicant. Site specific information should be referenced.	EHR	
5.2	8	Appears to require site specific records retrieval information.	EHR	
6		The discussions should refer to specific NRC guidance addressing the interim storage of LLW, e.g., waste form stability and containerization to prevent internal and external container corrosion and leaks, etc. See SRP Section 11.4 and its references.	JCD	

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6.1	9	Section appears to reference a site-specific waste management plan, approach, or program. Inconsistent use of terminology and no site specific information required.	EHR	
6.2.1	9	Should describe <u>process</u> for determining and obtaining additional onsite waste storage.	EHR	
6.2.2	9	Should reference where site specific periodic assessments are required or controlled.	EHR	
7	9	There are important terms in the body of the template that should be added to the definitions, e.g., boundary of discharge or release path for liquid effluents, site conceptual model, substantial, etc.	JCD	
7	9	Add definitions for: Surface Water and Waste Management Program	EHR	
APP A	11	Should line items 6 and 7 be preceded with an item a)? Is there something missing? On the second page, line item 4, should the discussion also include inaccessible pipe chases in addition to trenches?	JCD	
App A	11	- Add "AND PROCEDURAL" AFTER "OPERATIONAL" in the title.	CH	
App B	14	Add to the listing the following systems: LWMS, SWMS, GWMS, condensate storage tanks, refueling water storage tanks, established discharge blowdown lines, etc. The listing should be expanded to include systems commonly used at existing plants and others described in current DCD applications.	JCD	
App B	14	The list of systems listed should be expanded.	CH	
App C	15	The four entries are insufficient coverage of the topics.	JCD	
App C	15	This list does not address all potential sources	EHR	