

Davis-Besse
NRC Request for Additional Information (RAI)

RAI #	EAL	Question
	GENERIC	It is expected that licensee's adhere to endorsed guidance, particularly for Initiating Conditions and Definitions, with no differences or deviations other than those related to a licensee's particular design. This is to ensure regulatory stability by enforcing the expectation that licensees adhere to NRC reviewed and endorsed guidance with no non-design related deviations and little to no differences. While the NRC is not proposing verbatim compliance with the endorsed guidance, where applicable, the NRC will be pointing out areas where we expect compliance with the endorsed guidance. This is primarily based upon industry and NRC experience with issues related to the particular EAL.
1	DEFINITIONS	1. Explain why you deviated from the endorsed guidance by not including a definition for "extortion," "sabotage," or "security condition," or incorporate the definitions as expected. 2. The site definition of "large aircraft" is considered potential official use only (OUO) by the NRC and is not to be incorporated into the EAL scheme.
2	ISFSI, HU6	It is expected that the EAL related to ISFSI be incorporated using a separate numbering convention. The endorsed guidance uses E-HU1, but EU1 has been found acceptable at other utilities. Please explain why this deviation is necessary.
3	PAGE 5, 1 ST PARAGRAPH	This is a deviation from endorsed guidance. Please explain why this deviation is necessary or follow endorsed guidance.
4	FISSION BARRIER	Does your site use Critical Function Status Trees?
5	FUEL CLAD, POTENTIAL LOSS	Please explain why low level AND high temperatures are needed for this barrier? As high temperature is already considered in the FB matrix, this appears redundant and unnecessary.
6	RG1, RS1, RA1, RU1, HU4, SS1, SA1, SU1, SS2, SS4, SA4, SU4, CA1, CU1, CU2, CG7, CS7, CA7, CU7, CU8, CU10	Add the timing notes from the endorsed guidance or explain their omission. These were added due to the numerous issues related to licensee's understanding the NRC's expectations related to the timeliness of EAL declarations.
7	RG1, RS1	Please explain how you will address CDE Thyroid for adults. This question was answered via telecon between NSIR reviewer D.Johnson and Davis-Besse licensing, dated 10/15/2008
8	RS1	"...using actual meteorology" in the IC is a deviation from the endorsed guidance. Please explain the deviation or follow the endorsed guidance.

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9	RA1	Please explain how EAL decision-makers will be able to differentiate between "top of scale" as an EAL entry condition versus failed instrumentation.
10	RA3	You included site specific information as to why CAS is on the list but did not mention that maintaining access through site doors and security barriers is the basis for CAS being on this list. This may lead to misconceptions as to the intent of the EAL. Please explain why this was not incorporated or revise to reflect the above information.
11	HA1	Please explain why you deviated from endorsed guidance and added potentially 'official use only' information to the EAL by stating "large aircraft" instead of "airliner". While the term does not create a potential OUO issue directly in the EAL, it's use led to it being defined, which leads to the potential OUO.
12	HU1	The term "security condition" was developed by a joint EP-Security industry team to better align EALs with the upcoming revision to site security contingency plans via a revision to NEI 03-12. This term is important to this needed alignment. Please explain the deviation or revise to follow endorsed guidance.
13	HA3, HU3, HA4, HU4	Please explain why your diesel generator room(s) are not considered a safe shutdown vital area.
14	HU4	You stated "For the purposes of declaring an emergency event, the term "extinguished" means no visible flames." Explain why excessive smoke or other indications of a possible fire are not included as a discriminator for defining when a fire is extinguished.
15	SA1, SA3	Please explain the deviation in the IC or revise accordingly.
16	SS3	Please elaborate as to what "controls area" means. Is this synonymous with the reactor control console?
17	SA3	Please explain the deviation of not adding the expected EAL 1b or add accordingly.
18	SS4, SA4, SU4	The expectation for the logic is an "or" or "either". Please elaborate on why consideration must be given to endorse a new EAL scheme or revise accordingly.