

PMBelCOL PEmails

From: Brian Anderson
Sent: Wednesday, January 14, 2009 2:47 PM
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Cc: Joseph Sebrosky; Brian Anderson
Subject: DRAFT - RAI 1783 - SRP section 13.3 - BELLEFONTE UNITS 3 AND 4 COMBINED LICENSE APPLICATION
Attachments: BLN Draft RAI 1783 - 13.3.doc
Importance: High

Attached is a draft RAI related to SRP section 13.3 for the Bellefonte Units 3 and 4 Combined License Application. Please let me know if you would like to schedule a conference call to discuss this RAI.

Thank you,
Brian

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COMBINED LICENSE APPLICATION
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BLN Draft RAI 1783 - 13.3.doc		32762

Options

Priority: High
Return Notification: No
Reply Requested: No
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Request for Additional Information No. 1783
Bellefonte Units 3 and 4
Tennessee Valley Authority
Docket No. 52-014 and 52-015
SRP Section: 13.03 - Emergency Planning
Application Section: COLA Part 5

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

13.03-***

SITE - 22: Emergency Action Levels

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4), Section IV.B of Appendix E to 10 CFR Part 50; NUREG-0654/FEMA-REP-1, Planning Standard D

SRP ACCEPTANCE CRITERION: Requirement A; Acceptance Criteria 1 and 3

EALs are discussed in Section D, "Emergency Classification System," of COL application Part 5.

The initial EALs, which are required by 10 CFR 50.47(b)(4) and Section IV.B of Appendix E to 10 CFR Part 50, must be approved by the NRC. The Bellefonte combined license (COL) application does not fully address certain aspects of the required EAL scheme. This is because various equipment set points and other information cannot be determined until the as-built information is available; e.g., head corrections, radiation shine, final technical specifications, and equipment calculations and tolerances. The NRC has been evaluating possible options to ensure applicants address the regulations and provide the following:

Option 1 – Submit an entire EAL scheme, which contains all site-specific information, including set points. Until this information is finalized, EALs would remain an open item.

Option 2 – Submit emergency plan Section D, "Emergency Classification System," which addresses the four critical elements of an EAL scheme (listed below). The NRC will determine the acceptability of the EAL scheme.

- *Critical Element 1* – Applicant proposes an overview of its emergency action level scheme including defining the four emergency classification levels, (i.e., Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency), as stated in NEI 99-01, Revision 5, with a general list of licensee actions at each emergency classification level.

- *Critical Element 2* – Applicant proposes to develop the remainder of its EAL scheme by using a specified NRC endorsed guidance document. In the development of its EALs, the proposed EALs should be developed with few or no deviations or differences, other than those attributable to the specific reactor design. NEI 07-01, if endorsed, will be applicable to the AP1000 and ESBWR (passive) reactor designs, and NEI 99-01 is applicable to all (non-passive) reactor designs. If applicable, EALs related to digital instrumentation and control must be included. The NRC must find in the Safety Evaluation Report that this approach is acceptable for each site.

- *Critical Element 3* – Applicant proposes a License Condition (LC) that the applicant will create a fully developed set of EALs in accordance with the specified guidance document. These fully developed EALs must be submitted to the NRC for confirmation at least 180 days prior to fuel load.
- *Critical Element 4* – The EALs must be kept in a document controlled by 10 CFR 50.54(q), such as the emergency plan; or a lower tier document, such as the Emergency Plan Implementing Procedures.

Please review the two options provided above, identify which option will be chosen, and provide the detailed EAL information in support of the chosen option.

DRAFT