

Callaway2COLPEm Resource

From: Surinder Arora
Sent: Monday, February 02, 2009 4:08 PM
To: Shafer, David E
Cc: Callaway2COL Resource; Don Johnson; Dan Barss; Kevin Williams; Joseph Colaccino; Meena Khanna; Ann Hodgdon; NPUnit2-EPR@ameren.com; John Rycyna
Subject: Draft RAI No. 2 (eRAI No. 1902)
Attachments: RAI 1902.doc

Dave,

Attached is DRAFT RAI No. 2 (eRAI No. 1902). You have until February 17, 2009 to review it and decide whether you need a conference call to discuss it. After the call or after February 17, 2009, the RAI will be finalized and sent to you for response. You will then have 30 days to respond.

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Hearing Identifier: CallawayPlant_Unit2_COL_Public
Email Number: 5

Mail Envelope Properties (CB87FC66F95637428C5E0D066E756B6F99380B3300)

Subject: Draft RAI No. 2 (eRAI No. 1902)
Sent Date: 2/2/2009 4:07:55 PM
Received Date: 2/2/2009 4:07:55 PM
From: Surinder Arora

Created By: Surinder.Arora@nrc.gov

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Files	Size	Date & Time
MESSAGE	512	2/2/2009 4:07:55 PM
RAI 1902.doc	33274	

Options

Priority: Standard

Return Notification: No

Reply Requested: Yes

Sensitivity: Normal

Expiration Date:

Recipients Received:

Request for Additional Information No. 1902 Revision 0

2/2/2009

Callaway Unit 2
AmerenUE
Docket No. 52-037
SRP Section: 13.03 - Emergency Planning
Application Section: Part 5 - Emergency Plan: Part 2 Section D - EALs

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

13.03-1

[Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4), Section IV.B of Appendix E to 10 CFR Part 50]

Emergency Action Levels (EALs) are discussed in Part 2, Section D, “Emergency Classification System,” of COL application reference ADAMS Accession No. ML082140630

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. Recent combined license (COL) applications have been submitted that do 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 provides 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

also 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.

Please inform the NRC which option you intend to pursue within two-weeks of receipt of this RAI.