

PMLevyCOLPEm Resource

From: Brian Anderson
Sent: Friday, May 08, 2009 1:18 PM
To: robert.kitchen@pgnmail.com; david.waters@pgnmail.com; tillie.wilkins@pgnmail.com; PMLevyCOLPEm Resource
Cc: Brian Anderson
Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 027 RELATED TO SRP SECTION 14.3.10 FOR THE LEVY COUNTY UNITS 1 AND 2 COMBINED LICENSE APPLICATION
Attachments: LNP RAI 027 - ML091280225.pdf
Importance: High

Attached is RAI Letter No. 027 related to SRP Section 14.3.10 for the Levy County Units 1 and 2 combined license application. The ADAMS Accession number is ML091280225.

Brian Anderson
301-415-9967
Lead Project Manager, AP1000 Projects Branch 1
Office of New Reactors
U.S. Nuclear Regulatory Commission

Hearing Identifier: Levy_County_COL_Public
Email Number: 107

Mail Envelope Properties (CB87FC66F95637428C5E0D066E756B6FBFFFFD150B)

Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 027 RELATED TO
SRP SECTION 14.3.10 FOR THE LEVY COUNTY UNITS 1 AND 2 COMBINED LICENSE
APPLICATION

Sent Date: 5/8/2009 1:17:55 PM

Received Date: 5/8/2009 1:17:57 PM

From: Brian Anderson

Created By: Brian.Anderson@nrc.gov

Recipients:

"Brian Anderson" <Brian.Anderson@nrc.gov>

Tracking Status: None

"robert.kitchen@pgnmail.com" <robert.kitchen@pgnmail.com>

Tracking Status: None

"david.waters@pgnmail.com" <david.waters@pgnmail.com>

Tracking Status: None

"tillie.wilkins@pgnmail.com" <tillie.wilkins@pgnmail.com>

Tracking Status: None

"PMLevyCOLPEm Resource" <PMLevyCOLPEm.Resource@nrc.gov>

Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	328	5/8/2009 1:17:57 PM
LNP RAI 027 - ML091280225.pdf		151915

Options

Priority: High

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

LevyCountyRAIsPEm Resource

From: Brian Anderson
Sent: Friday, May 08, 2009 11:12 AM
To: LevyCountyRAIsPEm Resource
Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 027 RELATED TO SRP SECTION 14.3.10 FOR THE LEVY COUNTY UNITS 1 AND 2 COMBINED LICENSE APPLICATION
Attachments: LNP-RAI-LTR-027.doc
Importance: High

Hearing Identifier: Levy_County_COL_eRAIs
Email Number: 28

Mail Envelope Properties (CB87FC66F95637428C5E0D066E756B6FBFFFD146C)

Subject: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 027 RELATED TO
SRP SECTION 14.3.10 FOR THE LEVY COUNTY UNITS 1 AND 2 COMBINED LICENSE
APPLICATION

Sent Date: 5/8/2009 11:12:23 AM

Received Date: 5/8/2009 11:12:25 AM

From: Brian Anderson

Created By: Brian.Anderson@nrc.gov

Recipients:

"LevyCountyRAIsPEm Resource" <LevyCountyRAIsPEm.Resource@nrc.gov>

Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	3	5/8/2009 11:12:25 AM
LNP-RAI-LTR-027.doc	77818	

Options

Priority: High

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

May 8, 2009

Mr. Garry Miller
General Manager, Nuclear Plant Development
Progress Energy Florida, Inc.
PO Box 1551
411 Fayetteville Street Mall
Raleigh, NC 27602

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 027 RELATED TO
SRP SECTION 14.3.10 FOR THE LEVY COUNTY NUCLEAR PLANT, UNITS 1
and 2 COMBINED LICENSE APPLICATION

Dear Mr. Miller:

By letter dated July 28, 2008, as supplemented by a letter dated September 12, 2008, Progress Energy Florida, Inc. submitted its application to the U. S. Nuclear Regulatory Commission (NRC) for a combined license (COL) for two AP1000 advanced passive pressurized water reactors pursuant to 10 CFR Part 52. The NRC staff is performing a detailed review of this application to enable the staff to reach a conclusion on the safety of the proposed application.

The NRC staff has identified that additional information is needed to continue portions of the review. The staff's request for additional information (RAI) is contained in the enclosure to this letter.

To support the review schedule, you are requested to respond within 30 days of the date of this letter. If changes are needed to the final safety analysis report, the staff requests that the RAI response include the proposed wording changes.

If you have any questions or comments concerning this matter, you may contact me at 301-415-9967.

Sincerely,

/RA/

Brian C. Anderson, Lead Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-029
52-030

eRAI Tracking No. 2408

Enclosure:
Request for Additional Information

If you have any questions or comments concerning this matter, you may contact me at 301-415-9967.

Sincerely,

/RA/

Brian C. Anderson, Lead Project Manager
AP1000 Projects Branch 1
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-029
52-030

eRAI Tracking No. 2408

Enclosure:
Request for Additional Information

Distribution:

Public	SCoffin	TSimms	ABowers
RidsNroDnrlNwe1	JSebrosky	SGoetz	DBarss
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RidsAcrsAcnw_MailCenter	CAraguas	SBrock	
RidsRgn2MailCenter	RJoshi	BAnderson	

NRO-002

OFFICE	LIB/BC	NWE1/PM	OGC	NWE1/L-PM
NAME	KWilliams *	BAnderson *	JMartin*	BAnderson*
DATE	03/23/09	03/23/09	04/16/09	05/08/09

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information
Levy County, Units 1 and 2
Progress Energy Florida, Inc.
Docket No. 52-029 and 52-030
SRP Section: 14.03.10 - Emergency Planning - Inspections, Tests, Analyses,
and Acceptance Criteria
Application Section: COL Part 10 - ITAAC

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

14.03.10-1

ITAAC-1: ITAAC

Basis: 10 CFR 52.80(a)

SRP Acceptance Criteria: Requirement E; Acceptance Criterion 23

- A. Some EP ITAAC will be completed for Unit 1 before those ITAAC applicable to Unit 2. To allow closure of common ITAAC for both units when Unit 1 is constructed, discuss whether the development of separate ITAAC tables for each unit was considered and why separate tables were not developed.
- B. In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," the acceptance criteria are prefaced with the phrase, "Test records demonstrate ..." or "Report exists and concludes ..." ITAAC Acceptance Criteria must be specific and objective in order to clearly identify specific requirements and compliance. NRC Regulatory Issue Summary (RIS) 2008-05, "Lessons Learned to Improve Inspections, Tests, Analyses, and Acceptance Criteria Submittal," dated February 27, 2008, provides the following guidance:

"If applicants use the phrase, "a report exists and concludes that ...," they should consider specifying the scope and the type of report. For example, they should explain whether the scope of the report includes the design, the as-built construction (as reconciled with the design), or any other information."

The use of phrases "test records demonstrate" or "a report exists that confirms" in the acceptance criteria does not clearly describe how verification is actually conducted to confirm compliance. An area that might be appropriate for using a report to confirm that various ITAAC have been met is in Planning Standard 8.0, "Exercises and Drills," for which an Exercise Report could serve to verify that various exercise-related ITAAC (e.g., exercise objectives) have been met.

Consistent with RIS 2008-05, discuss the type and scope of the reports cited in ITAAC Table 3.8-1, including how the report will serve to provide accurate and reliable confirmation that compliance with acceptance criteria is evident, or consider removing the words "test records demonstrate" or "a report exists that confirms" from the Table.

- C. In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," three acceptance criteria are provided for planning standard 8.0, "Exercises and Drills." Address the following questions pertaining to the full-participation exercise, and the applicable guidance provided in Regulatory

Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)":

1. Table C.II.1-B1, acceptance criterion 14.1.2, includes the bracketed statement that "[t]he COL applicant will identify responsibilities and associated acceptance criteria." Explain why Table 3.8-1, acceptance criterion 8.1.2, does not identify any responsibilities and associated acceptance criteria, in relation to onsite emergency response personnel successfully performing their assigned responsibilities. Provide the appropriate acceptance criterion or explain why it is not required.
 2. Table C.II.1-B1, acceptance criterion 14.1.1, includes the bracketed statement that "[t]he COL applicant will identify exercise objectives and associated acceptance criteria." Table 3.8-1, acceptance criterion 8.1.1, states that exercise objectives have been met for each of the listed emergency planning program elements. However, Table 3.8-1 does not identify the associated acceptance criteria for each objective listed. Provide the appropriate acceptance criterion or explain why it is not required.
 3. Table C.II.1-B1, acceptance criterion 14.1.3, references offsite exercise objectives associated with the full participation exercise. Table 3.8-1, acceptance criterion 8.1.3, does not include offsite exercise objectives and associated acceptance criterion. Provide offsite exercise objectives and associated acceptance criterion or explain why it is not required.
- D. In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," Acceptance Criterion 3.1 for Planning Standard 3.0, "Emergency Communications," states, "...communications (both primary and secondary methods/systems) were established among the Control Rooms and the EOF with Florida Division of Emergency Management (DEM) Warning Point and EOC; Levy County Warning Point and EOC...Communications are established between the Control Rooms and the EOF with the LNP radiological field monitoring teams....." Table C.II.1-B1 of NRC RG 1.206, acceptance criterion 6.1, states, "Communications are established among the control room, TSC, EOF, principal State and local EOCs, and radiological field assessment teams." Revise ITAAC Acceptance Criterion 3.1 to include the TSC or explain why it is not required.
- E. In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," Acceptance Criterion 5.1.2 for Planning Standard 5.0, "Emergency Facilities and Equipment," states, "...communications equipment is installed and voice transmission and reception are accomplished between the emergency response facilities." Acceptance criterion 5.1.4 states, "...communications....and reception are accomplished between the Control Rooms, OSCs, and EOF." Clarify whether both acceptance criteria are needed or whether they are duplicates of each other. If acceptance criterion 5.1.4 remains, explain why communications are not established with the TSC or discuss why it is not required.
- F. In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," Acceptance Criterion 5.1.6 for Planning Standard 5.0, "Emergency Facilities and Equipment," states, "There is an OSC located inside the Units Protected Area. It is separate from the Control Room within the Protected Area." Table C.II.1-B1 of NRC RG 1.206, acceptance criterion 8.1.6 states, "The OSC is located onsite, separate from the control room and TSC." Revise ITAAC Acceptance Criterion 5.1.6 to include the TSC or explain why it is not required.

- G. In NRC Regulatory Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)," acceptance criterion 8.1.2 for Planning Standard 8.0, "Emergency Facilities and Equipment," states, "The TSC is close to the control room, and the walking distance from the TSC to the control room does not exceed two minutes." In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," Planning Standard 5.0, "Emergency Facilities and Equipment," the reference Acceptance Criterion is missing. Provide the associated ITAAC Acceptance Criterion or explain why it is not required.
- H. In NRC Regulatory Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)," acceptance criterion 8.2.4 for Planning Standard 8.0, "Emergency Facilities and Equipment," states, "The EOF has the means to acquire, display and evaluate radiological, meteorological, and plant system data pertinent to determining offsite protective measures." In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," Planning Standard 5.0, "Emergency Facilities and Equipment," Acceptance Criterion 5.2.4 states, "Radiological data, meteorological data, and plant system data is displayed in the EOF." Clarify the capability of the EOF consistent with the associated ITAAC Acceptance Criterion in NRC RG 1.206 or explain why it is not required.
- I. In NRC Regulatory Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)," acceptance criterion 8.3 to 8.6 for Planning Standard 8.0, "Emergency Facilities and Equipment," exists. In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," Planning Standard 5.0, "Emergency Facilities and Equipment," does not include Acceptance Criterion for this ITAAC. Provide the associated ITAAC Acceptance Criterion consistent with NRC RG 1.206 or explain why it is not required.
- J. In NRC Regulatory Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)," acceptance criterion for Planning Standard 7.0, "Public Education and Information," includes the bracketed statement that "[t]he COL applicant will specify the number of news media to be accommodated." In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," the acceptance criterion for Planning Standard 4.0, "Public Education and Information," states, "The as-built ENS includes designated space available for news media briefings." Provide the specific number of news media personnel to be accommodated consistent with NRC RG 1.206 or explain why it is not required.
- K. In NRC Regulatory Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-ITAAC)," acceptance criterion 9.1 for Planning Standard 9.0, "Accident Assessment," states, "The means exists to provide initial and continuing radiological assessment throughout the course of an accident." In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," the acceptance criterion 6.1 for Planning Standard 6.0, "Accident Assessment," states, ".....initial and continuing radiological assessment throughout displays of instrumentation indicators in the Control Room, TSCs and EOF during the course of drills and/or exercises." Explain why the capability to provide initial

and continuing radiological assessment would only be needed during drills and/or exercises versus during the duration of an accident. Revise the ITAAC Acceptance Criterion consistent with NRC RG 1.206 or explain why it is not required.

- L. In NRC Regulatory Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-IT AAC)," acceptance criterion 9.1 to 9.9 for Planning Standard 9.0, "Accident Assessment," includes the bracketed statement, "[t]he COL applicant will identify specific capabilities." In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," acceptance criterion 6.1 to 6.9 for Planning Standard 6.0, "Accident Assessment," does not all identify specific capabilities. Provide specific capabilities for this ITAAC Acceptance Criterion or explain why they are not required.
- M. In NRC Regulatory Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-IT AAC)," acceptance criterion for Planning Standard 10.0, "Protective Response," includes the bracketed statement, "[t]he COL applicant will identify specific capabilities." In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," acceptance criterion 7.1 for Planning Standard 7.0, "Accident Assessment," does not identify specific capabilities to warn and advise onsite individuals of an emergency. Provide specific capabilities for this ITAAC Acceptance Criterion or explain why they are not required.
- N. In NRC Regulatory Guide (RG) 1.206, Appendix C.II.1-B, Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-IT AAC)," acceptance criterion 10.4 for Planning Standard 10.0, "Protective Response," states, "The means exists to register and monitor evacuees at relocation centers." In Part 10 of the COL application, "Proposed License Conditions (Including ITAAC)," Table 3.8-1, "Inspections, Tests, Analyses, and Acceptance Criteria," acceptance criterion 7.4 does not exist. Provide the associated ITAAC and specific capabilities per NRC RG 1.206 or explain why it is not required.
- O. Table C.II.1-B1, "Emergency Planning – Generic Inspection, Test, Analysis, and Acceptance Criteria (EP-IT AAC)," in Appendix C.II.1-B, "Development Guidance for Emergency Planning ITAAC," to RG 1.206 contains the generic EP-IT AAC table. The table includes 17 Planning Standards and the accompanying EP Program Elements, Inspection, Tests, Analysis, and Acceptance Criteria. The COL application EP-IT AAC Table 3.8-1 does not address eight of the generic ITAAC Planning Standards. The following generic ITAAC Planning Standards are not addressed:
 - 1. Assignment of Responsibility-Organizational Control--10 CFR 50.47(b)(1)
 - 2. Onsite Emergency Organization--10 CFR 50.47(b)(2)
 - 3. Emergency Response Support and Resources--10 CFR 50.47(b)(3)
 - 4. Radiological Exposure Control--10 CFR 50.47(b)(11)
 - 5. Medical and Public Health Support--10 CFR 50.47(b)(12)
 - 6. Recovery and Reentry Planning and Post-Accident Operations --10 CFR 50.47(b)(13)

7. Radiological Emergency Response Training--10 CFR 50.47(b)(15)
8. Responsibility for Planning Effort: Development, Periodic Review, and Distribution of Emergency Plans --10 CFR 50.47(b)(16)

Discuss why ITAAC were not developed for the above Planning Standards, or propose appropriate ITAAC.