PMSTPCOL PEmails

From: Eudy, Michael
Sent: Wednesday, July 22, 2009 2:52 PM
To: Stephens, Scot
Cc: STPCOL
Subject: STP RAI 3014 Letter 145 - Chapter 12.01, 12.02 and 12.05
Attachments: ML0919007640 RAI 3014 LTR 145.pdf

Scot,

With respect to the recently issued STP RAI letter 145, dated July 9, 2009 however received by STP v.i.a. electronic distribution today, 7/22/09, we have updated the eRAI database to reflect a new issue date of July 22, 2009 and a new due date of August 21, 2009 accordingly.

Michael A. Eudy - Project Manager
NRO/DNRL/NGE1&2
301-415-3104

Hearing Identifier: SouthTexas34Public_EX
Email Number: 1479

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Subject: STP RAI 3014 Letter 145 - Chapter 12.01, 12.02 and 12.05
Sent Date: 7/22/2009 2:52:20 PM
Received Date: 7/22/2009 2:52:21 PM
From: Eudy, Michael

Created By: Michael.Eudy@nrc.gov

Recipients:
"STPCOL" <STP.COL@nrc.gov>
Tracking Status: None
"Stephens, Scot" <scstephens@STPEGS.COM>
Tracking Status: None

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MESSAGE	368	7/22/2009 2:52:21 PM
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Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

July 9, 2009

Mr. Scott Head, Manager
Regulatory Affairs
STP Nuclear Operating Company
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 145 RELATED TO SRP SECTIONS 12.01, 12.02 AND 12.05 FOR THE SOUTH TEXAS PROJECT COMBINED LICENSE APPLICATION

Dear Mr. Head

By letter dated September 20, 2007, STP Nuclear Operating Company (STP) submitted for approval a combined license application pursuant to 10 CFR Part 52. The U. S. Nuclear Regulatory Commission (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 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, I can be reached at 301-415-3104 or by e-mail at Michael.Eudy@nrc.gov or you may contact George Wunder at 301-415-1494 or George.Wunder@nrc.gov.

Sincerely,

/RA/

Michael Eudy, Senior Project Manager
ABWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-012
52-013

eRAI Tracking Nos. 2667, 2820, 3013, and 3014

Enclosure:
Request for Additional Information

cc: William Mookhoek
Scot Stephens

If you have any questions or comments concerning this matter, I can be reached at 301-415-3104 or by e-mail at Michael.Eudy@nrc.gov or you may contact George Wunder at 301-415-1494 or George.Wunder@nrc.gov.

Sincerely,

/RA/

Michael Eudy, Project Manager
ABWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Docket Nos. 52-012
52-013

eRAI Tracking No. 2667, 2820, 3013, and 3014

Enclosure:
Request for Additional Information

cc: William Mookhoek
Scot Stephens

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***Approval captured electronically in the electronic RAI system.**

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Request for Additional Information No. 3014 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 12.01 - Assuring that Occupational Radiation Exposures Are As Low as is Reasonably Achievable
Application Section: 12.1

QUESTIONS for Health Physics Branch (CHPB)

12.01-1

STP 3 & 4 COL FSAR Section 12.1.4.3, Occupational Radiation Exposures, states "occupational radiation exposures will be maintained ALARA by means of the Operational Radiation Protection Program described in Section 12.5S" and that "The operational plans, procedures and policies currently in use at STP 1 & 2 reflect industry experience and guidance. They will be used, in conjunction with the guidance contained in the documents identified above, to develop the policies, plans and procedures for STP 3 & 4. Many of these plans, procedures and policies will be common to all four units."

In keeping with the above stated policy of utilizing "industry experience and guidance" in development of the Radiation Protection Program, please answer the following:

1) Verify that STP has reviewed Draft Nuclear Energy Institute (NEI) document NEI 07-08, "Generic FSAR Template Guidance for Ensuring That Occupational Radiation Exposures Are As Low As is Reasonably Achievable (ALARA)" for applicability and possible incorporation into the STP 3 & 4 COL.

2) NEI 07-03 alone is not enough to fully describe all elements of an ALARA program. NEI 07-08 supplements the ALARA program description in NEI 07-03 with information describing the roles and responsibilities of management and staff, training requirements, as well as keys elements of an effective ALARA program. If STP has reviewed NEI 07-08 and determined that it will not be incorporated into the FSAR, modify applicable FSAR Sections to fully describe all elements of the ALARA program, or justify an alternative. Otherwise, reference NEI 07-08 in the STP FSAR.

Request for Additional Information No. 2667 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 12.02 - Radiation Sources
Application Section: 12.2.1.2.6.2

QUESTIONS for Health Physics Branch (CHPB)

12.02-4

RG 1.206, Part C.I.12.2.1, Contained Sources, states that the applicant should describe the sources of radiation, during normal plant operations and accident conditions, that are the bases for the radiation protection design and that the sources should be described in the manner needed for input to the shield design calculation.

In accordance with RG 1.206, include radiation source information in FSAR Table 12.2-5a for the skid mounted Low Conductivity and High Conductivity Waste (LCW and HCW) filter/demineralizer systems that will be utilized in the STP 3 & 4 radwaste building.

12.02-5

RG 1.206, Part C.I.12.2.1, Contained Sources, states that the applicant should describe the sources of radiation, during normal plant operations and accident conditions, that are the bases for the radiation protection design and that the sources should be described in the manner needed for input to the shield design calculation.

Radiation source information contained in Section 12.2 of the STP 3 & 4 FSAR appears to be incomplete in several areas.

Given that Table 12.2-5a of the STP 3 & 4 FSAR contains no radiation source information for the proposed skid mounted LCW and HCW filter/demineralizer systems, provide information concerning how the associated dose rates, shield design, and radiation zone maps for the radwaste building were developed.

12.02-6

RG 1.206, Part C.I.12.2.1 states that the applicant describe any required radiation sources containing byproduct, source, and special nuclear material that may warrant shielding design consideration and provide a listing of isotope, quantity, form, and use of all sources that exceed 3.7 E+9 Bq (100 millicuries).

In accordance with RG 1.206, provide information about, and include a list of radiation sources containing byproduct, source, and special nuclear material in FSAR Section 12.2 including isotope, quantity, form, and use of all sources that exceed 3.7 E+9 Bq (100 millicuries).

Request for Additional Information No. 2820 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 12.05 - Operational Radiation Protection Program
Application Section: 12.5S.4.4

QUESTIONS for Health Physics Branch (CHPB)

12.05-1

FSAR Section 12.5S.4.4 identifies three Very High Radiation Areas (VHRA) requiring additional administrative controls for entry including access control, use of an RWP and additional monitoring. Section 12.5S also incorporates by reference Nuclear Energy Institute Report No. NEI 07-03, "Generic FSAR Template Guidance for Radiation Protection Program Description" (NEI 07-03). As specified in Section 12.5.4.4 of NEI 07-03, please include the following additional information in FSAR Section 12.3-4:

1) Anticipated frequency of accessing each of the Very High Radiation Areas.

2) Detailed drawings for each Very High Radiation Area that indicate physical barriers that completely enclose the respective area in a manner that is sufficient to thwart undetected entry into the area. Alternatively, if such detailed drawings are not available, describe how such barriers will be verified in the final design of the facility.

Request for Additional Information No. 3013 Revision 2

South Texas Project Units 3 and 4
South Texas Project Nuclear Operating Co
Docket No. 52-012 and 52-013
SRP Section: 12.05 - Operational Radiation Protection Program
Application Section: 12.5

QUESTIONS for Health Physics Branch (CHPB)

12.05-2

The applicant has not addressed this operational program directly; however STP COL FSAR Supplement 12.5S, “Operational Radiation Protection Program” discusses items related to this operational program. In this supplement the applicant incorporates by reference, with site specific supplements, NEI 07-03, "Generic FSAR Template Guidance for Radiation Protection Program Description," which is currently under review by the NRC staff. The applicant indicates that in the STP COL FSAR, Table 13.4S-1 provides milestones for radiation protection program implementation. The description of the operational program and proposed implementation milestone for the radiation protection program is reviewed in accordance with 10 CFR 20.1101. Its implementation is required by a license condition. The applicant has not described the radiation protection procedures/programs to be implemented at each phase of the operational program implementation in accordance with Table 13.4S-1. Please provide a description of the program aspects to be implemented prior to each milestone.

12.05-3

The applicant has not described the radiation protection procedures to be implemented at each phase of the operational program implementation in accordance with Table 13.4S-1 in the STP COL FSAR. Sections 12.5 and 12.5S of the STP 3 & 4 FSAR do not list or identify the milestones and do not provide sufficient detail to allow for a determination of whether adequate procedures will be implemented prior to each milestone. Please describe the procedures to be implemented prior to each milestone.

12.05-4

The applicant's FSAR, Section 12.5S, includes a commitment to use the guidance of NEI 07-03, “Generic FSAR Template Guidance for a Radiation Protection Program Description”, which is currently under NRC staff review. This NEI template includes the Radiation Protection Program Description as well as program implementation milestones for specific portions of the program. Should the staff accept NEI Template 07-03, please update the final version of this template (or otherwise update the FSAR to address any differences for consistency with an approved template). Accordingly, the applicant should update all internal citations to an approved template in applicable FSAR subsections and references.