

PMComanchePeakPEm Resource

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Sent: Thursday, September 03, 2009 5:12 PM
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Cc: Otto, Ngola; ComanchePeakCOL Resource
Subject: Comanche Peak RCOL Section 11.3 - RAI # 36
Attachments: RAI 3400 (RAI 36).doc

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The staff's request for additional information (RAI) is contained in the attachment.

The response to this RAI is due within 42 calendar days of September 3, 2009.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed wording changes

thank you,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

Hearing Identifier: ComanchePeak_COL_Public
Email Number: 579

Mail Envelope Properties (3DF2506A7257014AAC5857E5E852DEAC07625A4352)

Subject: Comanche Peak RCOL Section 11.3 - RAI # 36
Sent Date: 9/3/2009 5:12:08 PM
Received Date: 9/3/2009 5:12:09 PM
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Post Office: HQCLSTR02.nrc.gov

Files	Size	Date & Time
MESSAGE	574	9/3/2009 5:12:09 PM
RAI 3400 (RAI 36).doc	33274	

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Priority: Standard
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Request for Additional Information (RAI) No. 3400

RAI # 36

9/3/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 11.03 - Gaseous Waste Management System
Application Section: 11.3

QUESTIONS for Health Physics Branch (CHPB)

11.03-2

Tables 11.3-8R and 11.3-203 in the COLA, Part 2, FSAR (Rev 0) present GASPAR II code input parameter values for the site-specific application to calculate doses from gaseous effluents for compliance with 10 CFR 50 Appendix I and 40 CFR 190. The NRC staff's review of Section 11.3 indicates insufficient information is presented on site-specific parameter values and their basis to support Luminant's conclusions. Because GASPAR II applies effluent release concentrations calculated from a modified version of the PWR-GALE code (Refer to US-APWR DCD RAI 402-3028), the NRC staff is unable to independently confirm Luminant's dose calculations for a reasonable assurance of safety conclusion. Please provide the following information.

1. Provide a full description and supporting rationale for all modifications made to the code subroutines and submit the PWR-GALE input/output files for the site-specific application
2. Submit the GASPAR II code input/output files for the site-specific applications.
3. Submit the calculation and supporting technical basis documents including references for selecting the site-specific input parameter values in the GASPAR II code calculations.
4. Section 11.3.3.1 indicates doses calculated from site-specific parameters listed in Table 11.3-8R and presented in Table 11.3-9R result in a gamma air dose of 5.77E-03 mrad/yr, beta air dose of 4.46E-02 mrad/yr, total body dose of 4.72E-02 mrem/yr, skin dose of 8.55E-02 mrem/yr, and organ (child's bone) dose of 1.40E+00 mrem/yr. However, Table 11.3-9R presents a total body dose of 3.69E-03 mrem/yr and skin dose of 3.45E-02 mrem/yr (tabulated gamma and beta air doses and child's bone dose are the same as those in Section 11.3.3.1). Please address this inconsistency.
5. Section 11.3.3.1 indicates doses calculated from site-specific parameters listed in Table 11.3-8R and presented in Table 11.3-201 result in a total body dose of 1.58 person-rem and thyroid dose of 1.98 person-rem. However, there is no tabulated data in Section 11.2 that presents this population dose information (similar to individual doses presented in Table 11.3-9R). Please address this inconsistency.

6. Section 11.3.3.1 describes an evaluation for calculating gaseous effluent doses from the evaporation pond that conservatively assumes 50% of the liquid effluent release from Comanche Peak Nuclear Power Plant (CPNPP), Units 3 and 4 is diverted to this pond and is discharged to atmosphere as aerosol and vapor. However, another postulated scenario involving the pond was not addressed. Please provide an evaluation to address the onsite and offsite dose consequences from a postulated release of windblown dust emissions containing plant-derived corrosion and fission products into the environment if the liquid from evaporation pond should dry out during drought periods experienced at the site. Submit the analysis and technical basis documents including references addressing the potential onsite and offsite dose consequences of this postulated scenario, or justify its exclusion.
7. Section 11.3.3.3 indicates the offsite dose calculation manual (ODCM) for CPNPP, Units 3 and 4 is to be developed using guidance in NEI 07-09. This section also indicates that CPNPP, Units 1 and 2 have an existing ODCM that is to reflect the new reactor units (CPNPP Units 3 and 4). However, it is not clear whether the existing ODCM adequately addresses all elements in NEI 07-09A (Rev 0) approved by the NRC in March 2009. Please clarify this statement.

Revise the COLA to include this information and provide a markup of the FSAR in your response.