

PMComanchePeakPEm Resource

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Sent: Friday, September 04, 2009 8:08 PM
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Cc: Otto, Ngola; ComanchePeakCOL Resource
Subject: Comanche Peak RCOL Section 11.4 - RAI # 39
Attachments: RAI 3401 (RAI 39).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 45 calendar days of September 4, 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

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Request for Additional Information (RAI) No. 3401

RAI # 39

9/4/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 11.04 - Solid Waste Management System
Application Section: 11.4

QUESTIONS for Health Physics Branch (CHPB)

11.04-3

Section 11.4.1.5 in the combined license application (COLA), Part 2, FSAR (Rev 0) states, "... there is no unique direct release pathway from the solid waste handling operation to the environment, and a cost benefit analysis for the SWMS [solid waste management system] is included in the consideration of the LWMS [liquid waste management system] and GWMS [gaseous waste management system]." The site-specific cost benefit analysis using guidance in Regulatory Guide 1.110, "Cost-Benefit Analysis for Radwaste Systems for Light-water-Cooled Nuclear Power Reactors," (March 1976) for the LWMS in Section 11.2.1.5, and the GWMS in Section 11.3.1.5 concludes that the addition of processing equipment of reasonable treatment technology is not favorable or cost beneficial. The NRC staff's review of these sections indicate insufficient information was provided to independently confirm Luminant's conclusion for compliance with 10 CFR 50, Appendix I, Section II.D. Please provide the values, bases and assumptions used in the cost benefit analysis for the LWMS, GWMS, and SWMS.

11.04-4

Section 11.4.2.3 in the COLA, Part 2, FSAR (Rev 0) identifies a common radioactive waste interim storage facility between the proposed Comanche Peak Nuclear Power Plant (CPNPP), Units 3 and 4 that will be used to store classes A, B, and C wastes from all four CPNPP units for up to 10 years to satisfy COL 11.4(1). COL 11.4(1) in the US-APWR design certification document (DCD), Tier 2, FSAR (Rev 1) instructs the COL Applicant to identify plant-specific needs for onsite low-level radioactive waste storage and to provide a discussion of this onsite storage if additional storage capacity is desired beyond that provided in the DCD, Tier 2, FSAR, Section 11.4. The NRC staff's review of Section 11.4 in the COLA, Part 2, FSAR (Rev 0) indicates insufficient information is provided on the design of the interim radioactive waste storage facility for compliance with 10 CFR Parts 20, 50, 61, 71, 40 CFR 190, and 49 CFR 171-180. Please address the following items.

1. Provide the interim radioactive waste storage facility design information in Section 11.4. Specifically,
 - a. Identify the applicable Federal (Titles 10, 40, and 49 CFRs, etc.) regulations and describe how the design complies with these requirements.

- b. Identify the applicable NRC regulatory guidance and communications (such as NUREG/CR-4062, NUREG-0800, RIS 2008-12, GL 81-38, RG 4.21, etc.) and industry guidance (such as EPRI, etc.) and describe how the design conforms to these guidance documents and standards for compliance with the regulations in 1.a., or justify their exclusion.
- c. Identify other design information (such as ventilation exhaust system, structural requirements, shielding considerations, capacity, sizing, airborne radioactivity and area radiation monitoring, etc.) and describe their bases.
- d. Identify and describe the design features such as provisions for leakage prevention and/or detection that will be used to minimize contamination of the facility and environment.
- e. Identify and describe the associated programs and procedures that will be used to comply with Federal regulations and conform to NRC regulatory guidance, communications, and industry guidance.
- f. Identify and describe the ITAAC that will be used to ensure acceptable construction and operation of the interim radioactive waste storage facility, or justify its exclusion.

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