

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Friday, September 04, 2009 7:25 PM  
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**Cc:** Otto, Ngola; ComanchePeakCOL Resource  
**Subject:** Comanche Peak RCOL Section 11.4 - RAI # 38  
**Attachments:** RAI 2749 (RAI 38).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

**Hearing Identifier:** ComanchePeak\_COL\_Public  
**Email Number:** 584

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**Received Date:** 9/4/2009 7:24:59 PM  
**From:** Monarque, Stephen

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**Options**

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Request for Additional Information (RAI) No. 2749 Revision 0

RAI #38

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 - Solid Waste Management System

QUESTIONS for Balance of Plant Branch 1 (AP1000/EPR Projects) (SBPA)

11.04-1

Technical Rationale Section 4 of NUREG-0800, Standard Review Plan (SRP) Section 11.4, "Solid Waste Management System" states, "Compliance with GDC 61 requires that the SWMS [solid waste management system] and other systems (as permanently installed systems or in combination with mobile systems) that may contain radioactivity shall be designed to ensure adequate safety under normal and postulated accident conditions. This criterion specifies that such facilities shall be designed with a capability to permit inspection and testing of components important to safety and with suitable shielding for radiation protection."

Similarly, Regulatory Guide 1.206 "Combined License Applications for Nuclear Power Plants (LWR Edition)" states, the applicant should discuss any mobile or temporary equipment used for storing or processing liquid radwaste in accordance with RG 1.143, 'Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants.' If this guidance is not followed, the applicant should describe the specific alternative methods used. Describe system design features and operational procedures used to ensure that interconnections between plant systems and mobile processing equipment avoids the contamination of nonradioactive systems and uncontrolled releases of radioactivity in the environment (see IE BL-80-10, 'Contamination of Nonradioactive System and Resulting Potential for Unmonitored, Uncontrolled Release of Radioactivity in the Environment,' dated May 6, 1980, and RG 1.11, 'Instrument Lines Penetrating Primary Reactor Containment (Safety Guide 11) Supplement to Safety Guide 11, Backfitting Considerations,' March 1971 for details).

With respect to the mobile de-watering system, Luminant is requested to include in the FSAR, discussion of how contracted mobile de-watering system would meet the design requirements of Regulatory Guide (RG) 1.143, "Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants," Revision 2, November 2001. Additionally, Luminant is requested to include in the FSAR discussions of capability to permit inspection, testing of components, shielding, and operational procedures for contracted mobile systems.

#### 11.04-2

Technical Rationale Section 4 of NUREG-800 Standard Review Plan Section 11.4, states, "Compliance with GDC 61 requires that the SWMS [solid waste management system] and other systems (as permanently installed systems or in combination with mobile systems) that may contain radioactivity shall be designed to ensure adequate safety under normal and postulated accident conditions. This criterion specifies that the design of such facilities' shall enable inspection and testing of components important to safety and with suitable shielding for radiation protection."

In FSAR Section 11.4.1.6, "Mobile or Temporary Equipment," it states, "The de-watering station is contracted for vendor services." Luminant is requested to describe in the FSAR how the contracted de-watering station will meet the guidance of SRP Section 11.4 and RG 1.143, "Design Guidance for Radioactive Waste Management System, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants," Revision 2, November 2001.