

## PMComanchePeakPEm Resource

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**From:** Monarque, Stephen  
**Sent:** Tuesday, September 15, 2009 5:00 PM  
**To:** John.Only@luminant.com; Donald.Woodlan@luminant.com; Eric.Evans@luminant.com; cp34-rai-luminant@mnes-us.com; Diane Yeager; joseph tapia; Kazuya Hayashi; Matthew.Weeks@luminant.com; MNES RAI mailbox; Russ Bywater  
**Cc:** ComanchePeakCOL Resource; Otto, Ngola  
**Subject:** Comanche Peak RCOL- Section 11.5 - RAI # 59  
**Attachments:** RAI 3602(RAI 59).doc

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC 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 15, 2009.

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

thanks,

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

**Hearing Identifier:** ComanchePeak\_COL\_Public  
**Email Number:** 612

**Mail Envelope Properties** (3DF2506A7257014AAC5857E5E852DEAC0762E94BBA)

**Subject:** Comanche Peak RCOL- Section 11.5 - RAI # 59  
**Sent Date:** 9/15/2009 4:59:37 PM  
**Received Date:** 9/15/2009 4:59:39 PM  
**From:** Monarque, Stephen

**Created By:** Stephen.Monarque@nrc.gov

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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	575	9/15/2009 4:59:39 PM
RAI 3602(RAI 59).doc	30202	

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

Request for Additional Information (RAI) No. 3602

RAI # 59

9/15/2009

Comanche Peak Units 3 and 4  
Luminant Generation Company, LLC.  
Docket No. 52-034 and 52-035

SRP Section: 11.05 - Process and Effluent Radiological Monitoring Instrumentation and Sampling  
Systems

Application Section: 11.5

QUESTIONS for Health Physics Branch (CHPB)

11.05-3

The NRC staff's review of Sections 11.5.2.6 and 11.5.2.8 of the COLA, Part 2, FSAR (Rev 0) indicates an inconsistency in regards to implementation of site-specific procedures to satisfy CP COL 11.5(4) and CP COL 11.5(5) under the quality assurance program (QAP) in FSAR Chapter 17. The COL information items address development of procedures for acquiring and evaluating samples of radioactive effluents; equipment inspection, calibration, and maintenance of monitoring and sampling equipment; radioactive waste systems; analytical procedures; and regulated record using the applicable guidance of Regulatory Guide (RG) 1.21, 'Measuring, Evaluating, and Reporting Radioactive Material in Liquid and Gaseous Effluents and Solid Waste,' (October 2008), RG 1.33, 'Quality Assurance Program Requirements,' (February 1978) and RG 4.15, 'Quality Assurance for Radiological Monitoring Programs (Inception Through Normal Operations to License Termination - Effluent Streams and the Environment,' (November 2006) to comply with 10 CFR Parts 20 and 50.

FSAR Sections 11.5.2.6 and 11.5.2.8 indicate site-specific procedures are prepared and implemented under the QAP described in Chapter 17. However, Section 17.5.3 discusses use of an existing NRC approved QAP for CPNPP, Units 1 and 2 (based on ANSI/ASME N45.2-1971) which differs from SRP 17.5 (based on ASME NQA-1-1994, RG 1.8, 'Qualification and Training of Personnel for Nuclear Power Plants,' (May 2000), RG 1.28, 'Quality Assurance Program Requirements (Design and Construction),' (August 1985), and RG 1.33). Please justify use of ANSI/ASME N45.2-1971 (revised in 1977 - inactive standard) and departure from SRP 17.5 on the QAP for CPNPP Units 3 and 4. Revise the COLA to include this information and provide a markup in your response.