

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Sunday, September 20, 2009 1:18 PM
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Cc: ComanchePeakCOL Resource; Takacs, Michael
Subject: Comanche Peak RCOL- Section 13.3 - RAI # 70
Attachments: RAI 3295 (RAI 70).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. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within 43 calendar days of September 20, 2009.

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

thanks,

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

Hearing Identifier: ComanchePeak_COL_Public
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RAI 3295 (RAI 70).doc	33274	

Options

Priority: Standard

Return Notification: No

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Recipients Received:

Request for Additional Information (RAI) No. 3295

RAI # 70

9/20/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 13.03 - Emergency Planning
Application Section: 13.3

QUESTIONS for Licensing and Inspection Branch (NSIR/DPR/LIB) (EP)

13.03-1

SITE-4: Emergency Action Levels (EALs)

Basis: 10 CFR 52.79(a)(21), 10 CFR 50.47(b)(4), Section IV.B of Appendix E to 10 CFR Part 50

EALs are discussed in Part 5 – Emergency Plan, Appendix 1 of the Comanche Peak Units 3 and 4 COL application.

D.1. The initial EALs, which are required by 10 CFR 50.47(b)(4) and Section IV.B of Appendix E to 10 CFR Part 50, must be approved by the NRC. Recent combined license (COL) applications have been submitted that do not fully address certain aspects of the required EAL scheme. This is because various equipment set points and other information cannot be determined until the as-built information is available; e.g., head corrections, radiation shine, final technical specifications, and equipment calculations and tolerances. The NRC has been evaluating possible options to ensure applicants address the regulations and provides the following options:

Option 1 – Submit an entire EAL scheme, which contains all site-specific information, including set points. Until this information is finalized, EALs would remain an open item.

Option 2 – Submit emergency plan Section D, “Emergency Classification System,” which addresses the four critical elements of an EAL scheme (listed below). The NRC will determine the acceptability of the EAL scheme.

- *Critical Element 1* – Applicant proposes an overview of its emergency action level scheme including defining the four emergency classification levels, (i.e., Notification of Unusual Event, Alert, Site Area Emergency, and General Emergency), as stated in NEI 99-01, Revision 5, with a general list of licensee actions at each emergency classification level.
- *Critical Element 2* – Applicant proposes to develop the remainder of its EAL scheme by using a specified NRC endorsed guidance document. In the development of its EALs, the proposed EALs should be developed with few or no deviations or differences, other than those attributable to the specific reactor design. NEI 07-01, if endorsed, will be applicable to the AP1000 and ESBWR (passive) reactor designs, and NEI 99-01 is applicable to all (non-passive) reactor

designs. If applicable, EALs related to digital instrumentation and control must be included. The NRC must find in the Safety Evaluation Report that this approach is acceptable for each site.

- *Critical Element 3* – Applicant proposes a License Condition (LC) that the applicant will create a fully developed set of EALs in accordance with the specified guidance document. These fully developed EALs must be submitted to the NRC for confirmation at least 180 days prior to fuel load.
- *Critical Element 4* – The EALs must be kept in a document controlled by 10 CFR 50.54(q), such as the emergency plan; or a lower tier document, such as the Emergency Plan Implementing Procedures.

Please review the two options provided above, identify which option will be chosen, and provide the detailed EAL information in support of the chosen option.