PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Sunday, September 20, 2009 1:27 PM
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Cc: ComanchePeakCOL Resource; Takacs, Michael
Subject: Comanche Peak RCOL- Section 13.4 - RAI # 71
Attachments: RAI 3592 (RAI 71).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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Request for Additional Information (RAI) No. 3592

RAI # 71

9/20/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 13.04 - Operational Programs
Application Section: 13.4

QUESTIONS for Health Physics Branch (CHPB)

13.04-1

10 CFR 20.1406 requires licensees to minimize contamination of the facility and the environment. Regulatory Guide 4.21, Minimization of Contamination and Radioactive Waste Generation: Life Cycle Planning," (June 2008) notes that a conceptual site model and ground water monitoring programs are part of a leakage detection and minimization program. NEI Template 08-08 (Draft) “Generic FSAR Template Guidance for Life Cycle Minimization of Contamination”, a proposed acceptable method of demonstrating compliance with 10 CFR 20.1406, notes that applicants should develop the appropriate site procedures and implement these procedures and programs consistent with applicant’s FSAR section 13.4 (prior to initial fuel load as referenced in Radiation Protection Milestone 3). However, COL FSAR Section 13.4 does not contain any milestones for the development of a ground water monitoring program.

Please revise and update COL FSAR Section 13.4 to describe the ground water monitoring implementation milestone, or provide an alternate approach and the associated justification.

13.04-2

DCD FSAR Tier 2 Section 5.4.2.2 notes the requirement for a Primary-to-Secondary Leakage program in accordance with the criterion of NEI 97-06 “Steam Generator Program Guidelines”. COL FSAR Section 13.4, Table 13.4-201 “Operational Programs Required by NRC and Program Implementation”, Items 1 “Inservice Inspection Program”, and 2 “Inservice Testing Program” do not reference this section of the FSAR, nor do they reference 10CFR 50.55a.b(2)(iii) “Steam Generator Tubing”. The implementation milestones listed for these two items do not appear to be consistent with the monitoring criteria noted in Technical Specifications 3.4.13.2.

Please revise and update COL FSAR Section 13.4 Table 13.4-201 to reflect the FSAR and 10 CFR 55a sections that drives the Primary-to-Secondary Leakage monitoring program requirements, or provide an alternate approach and the associated justification.

13.04-3

10 CFR 50.34.f(2)(xxvi) [NUREG- 0737 III.D.1.1] requires leakage control and detection for systems outside containment that might contain highly radioactive fluids, and requires applicants to submit a leakage control program, including an initial test program and a schedule for retesting systems. DCD FSAR Tier 2 Chapter 16 (Technical Specifications), subsection 5.5.2, notes the requirement for a leakage minimization program for systems outside containment that might contain highly radioactive fluids.

1. COL FSAR Section 13.4, Table 13.4-201 "Operational Programs Required by NRC and Program Implementation", Items 1 "Inservice Inspection Program", and 2 "Inservice Testing Program" do not reference this section of the FSAR, nor do they reference 10 CFR 50.34.f(2)(xxvi).
2. Table 13.4-201 also includes Item 6, "Preservice Testing Program", which does not appear to list either the FSAR section or the "Program Source", consistent with the initial test requirements stated in 10 CFR 50.34.f(2)(xxvi) and NUREG- 0737 III.D.1.1.

Please revise and update COL FSAR Section 13.4 Table 13.4-201 to reference 10 CFR 50.34.f(2)(xxvi) and the FSAR sections that describe the Highly Radioactive Fluid Systems Outside Containment monitoring program requirements, or provide an alternate approach and the associated justification.