PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Saturday, September 26, 2009 2:08 PM
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Cc: Otto, Ngola; ComanchePeakCOL Resource
Subject: Comanche Peak RCOL Section 12.2 - RAI # 89
Attachments: RAI 3317 (RAI 89).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 37 calendar days of September 26, 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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Sent Date: 9/26/2009 2:08:12 PM
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From: Monarque, Stephen

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Request for Additional Information (RAI) No. 3317

RAI # 89

9/26/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 12.02 - Radiation Sources
Application Section: 12.2

QUESTIONS for Health Physics Branch (CHPB)

12.02-2

10 CFR 20.1802 require licensees to secure from unauthorized removal or access, additional materials in controlled or unrestricted areas that are not in storage. NUREG-0800, Standard Review Plan (SRP) Section 12.2 notes that the combined license (COL) applicant is responsible for identifying and quantifying any sources not identified in the referenced design certification document (DCD). 10 CFR 20 Subpart H "Respiratory Protection and Controls to Restrict Internal Exposure in Restricted Areas" requires licensees to use process or engineering controls to control the concentration of airborne radioactive material. SRP Section 12.3-12.4 provides guidance regarding monitoring for airborne radioactivity, and the protection of plant personnel from airborne contamination.

The US-APWR FSAR Tier 2 Section 12.2.3 COL 12.2(1) notes that the applicant is responsible for identifying any additional sources of radiation that are not identified in FSAR Tier 2 Section 12.2.1. Contrary to this requirement, Comanche Peak FSAR 12.2.1.1.10 does not provide any information regarding the corrosion and fission activity contained within the Evaporation Pond, the methods, models and assumptions employed to determine the residual fission and corrosion product activity in the pond, or how the material will be controlled in accordance with the requirements of 10 CFR 20.1801. Nor does the Comanche Peak FSAR describe the estimated airborne activity concentrations that could result from dispersion of the dried pond sediment due to wind, the resultant exposure to operating plant personnel, or the protective/prevent measures required by 10 CFR 20 Subpart H.

In accordance with the requirements of 10 CFR 20.1801 and Subpart H, and the guidance provided in SRP Sections 12.2 and 12.3-12.4, the applicant should revise and update the FSAR to describe:

- The quantity of fission and corrosion product activity in the Evaporation Pond
- The airborne activity exposure to plant personnel due to wind dispersed activity from pond sediment
- The features provided to restrict access to the radioactive material in the pond sediment
- The features provided to provide engineering controls to reduce airborne activity

, or describe and justify the specific alternate approaches employed.