PMComanchePeakPEm Resource

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Sent: Wednesday, September 30, 2009 9:21 PM
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Cc: Otto, Ngola; ComanchePeakCOL Resource
Subject: Comanche Peak RCOL Section 12.5 - RAI # 100
Attachments: RAI 3319 (RAI 100).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 36 calendar days of September 29, 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. 3319

RAI # 100

9/30/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 12.05 - Operational Radiation Protection Program
Application Section: 12.5

QUESTIONS for Health Physics Branch (CHPB)

12.05-1

Regulatory Guide (RG) 8.15, 'Acceptable Programs for Respiratory Protection,' Revision 1 (October 1999) provides guidance to licensees regarding methods acceptable to the NRC staff for demonstrating compliance with the respiratory protection requirements of 10 CFR 20 Subpart H “Respiratory Protection and Controls to Restrict Internal Exposure in Restricted Areas”. RG 8.15 notes that in 1988, the NRC and the Occupational Safety and Health Administration (OSHA) signed a Memorandum of Understanding (MOU) to clarify jurisdictional responsibilities at NRC-licensed facilities. The MOU makes it clear that if an NRC licensee is using respiratory protection to protect workers against non-radiological hazards, the OSHA requirements apply. In RG 8.15, Licensees are cautioned, that in situations involving mixed hazards, such as airborne radioactive materials and nonradioactive hazardous materials, compliance with 10 CFR Part 20 alone may not provide sufficient protection. The USAPWR DCD FSAR Tier 2 Chapter 1 indicates that the applicant complies with Regulatory Guide 8.15. However, COL FSAR Chapters 1, 12 and 13 are silent with respect to respiratory protection program elements for non-radiological hazards from work activities in radiological controlled areas, or for respiratory protection training and equipment provided for dual use (radiological and non-radiological conditions such as the Control Room where respiratory protection equipment may be required for chemical or radiological accident or Anticipated Operational Occurrence conditions).

The applicant should revise and update the FSAR Section 12.5 to describe those program elements that will be used to satisfy the respiratory protection program requirements associated with non-radiological hazards (i.e. Toxic gases, smoke or immediate danger to life and health (IDLH) atmospheres) that may be encountered in the radiological controlled areas of the plant.

12.05-2

10 CFR 20.1101(b) requires that the licensee develop and implement a radiation protection program that includes exposure reduction measures that implement the as low as reasonably achievable (ALARA) concept. Regulatory Guide (RG) 1.206 notes that the applicant should describe the methods that will be used to maintain operational exposures ALARA. 10 CFR 20.1406 requires that the applicant minimize the contamination of the facility and the environment. RG 4.21 notes that facility design can reduce the amount of activity present during decommissioning. RG 8.8 C.1.a notes that instructions provided to design personnel should reflect ALARA, while C.2.e notes that reducing cobalt content is an integral part of maintaining radiation exposure ALARA. NUREG-0800, Standard Review Plan (SRP) Section 12.5 III.6 “Operational Programs” notes that the radiation protection program is to be fully described.

The following Inspection Procedures (IP) provide guidance to NRC inspection personnel regarding the implementation of the elements expected for source term identification and reduction strategy. The radiation protection program should contain elements sufficient, that when inspected will provide:

a. Inspection Procedures (IP) -71121.02 "ALARA Planning and Controls" notes that Licensees are required to manage risks at ALARA levels. The guidance in the inspection procedure has the inspector determine if the licensee has developed an understanding of the plant source term, including knowledge of input mechanisms to reduce the source term and whether the licensee has a source-term control strategy in place. The inspection procedure notes that a cobalt reduction strategy is one of the minimum elements.
b. IP-79702 "Control and Monitoring or Radiological Source Term" part 02.01 "Implementation of the Source Term Control Program" notes that the licensee needs to understand the plant source term, and to have elements in place to reduce cobalt containing components. This document specifically references the EPRI "Radiation Field Control Manual".

The applicant is relying on NEI 07-03 to describe the radiation protection program. Since NEI 07-03 does not specifically address “Cobalt Reduction Strategy”, the applicant is requested to revise and update the COL FSAR 12.5 to describe those program elements related to establishing knowledge of the plant source term, understanding of input mechanisms and program elements to reduce unnecessary cobalt containing components. Alternately, the applicant is requested to describe the use of a different approach.