

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Monday, October 05, 2009 10:15 AM
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Cc: Otto, Ngola; ComanchePeakCOL Resource
Subject: Comanche Peak RCOLA - Section 12.5 - RAI # 117
Attachments: RAI 3510 (RAI 117).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 35 calendar days of October 5, 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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From: Monarque, Stephen

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Request for Additional Information (RAI) No. 3510

RAI # 117

10/5/2009

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)

12.05-3

10 CFR 20.1101 requires each licensee to have a Radiation Protection Program. Guidance for the content of this program is provided in Regulatory Guides 8.8, 'Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations will be as Low as is Reasonably Achievable, Revision 3 (June 1978) and 8.10, 'Operating Philosophy for Maintaining Occupational Radiation Exposures as Low as is Reasonably Achievable,' Revision 1-R (September 1975). NUREG-0800, Standard Review Plan (SRP) Section 12.5 provides guidance regarding the content of the radiation protection program. Comanche Peak Nuclear Power Plant (CPNPP) FSAR Sections 12.1 and 12.5 note that they address the required Radiation Protection Program elements with information provided in NEI templates NEI 07-03A "Generic FSAR Template Guidance for Radiation Protection Program Description" and 07-08, "Generic FSAR Template Guidance for Ensuring That Occupational Radiation Exposures Are As Low As Is Reasonably Achievable (ALARA)", in combination with existing or modified CPNPP Units 1 and 2 site program information. However, the applicant does not provide any additional information regarding the pre-existing radiation program at CPNPP Units 1 and 2, and in particular, how those programs may have elements or features that deviate from the guidance provided in NEI Templates 07-03A and 07-08.

Adherence to the guidance provided in NEI Templates 07-03A and 07-08 provides the basis for the staff finding for a radiation protection program that meets the requirements of 10 CFR 20.1101. Please revise and update the CP FSAR Chapter 12, to describe those program elements that deviate from the information provided in the NEI Templates.

12.05-4

10 CFR 20.1501(b) requires that instruments used for radiation measurements be periodically calibrated. NUREG-1736 "Consolidated Guidance: 10 CFR Part 20 – Standards for Protection Against Radiation" notes that this is normally done by adjusting an instrument response to reflect the value from a known standard. The applicant is relying on NEI 07-03 to describe the radiation protection program elements described in SRP Section 12.5. While NEI 07-03A discusses instrument calibration, neither NEI 07-03A or the CPNPP FSAR specifically address the process to be used to ensure that calibration of portable and laboratory instruments is performed using known standards (i.e. traceability to the National Institute of Standards and Technology (NIST) or equivalent international standards).

Since NEI 07-03 does not specifically address methods for establishing reference values for calibration standards, the applicant is requested to revise and update the COL FSAR 12.5 to describe those program elements related to establishing traceability of portable and laboratory radiation protection instruments to recognized national or international standards. Alternately, the applicant may describe the use of a different approach.