

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Monday, October 05, 2009 11:42 AM
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Cc: Otto, Ngola; ComanchePeakCOL Resource
Subject: Comanche Peak RCOLA - Section 12.1 - RAI # 118
Attachments: RAI 3316 (RAI 118).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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Subject: Comanche Peak RCOLA - Section 12.1 - RAI # 118
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Received Date: 10/5/2009 11:42:23 AM
From: Monarque, Stephen

Created By: Stephen.Monarque@nrc.gov

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Files	Size	Date & Time
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RAI 3316 (RAI 118).doc		35322

Options

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Request for Additional Information (RAI) No. 3316

RAI # 118

10/5/2009

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035

SRP Section: 12.01 - Assuring that Occupational Radiation Exposures Are As Low as is Reasonably Achievable

Application Section: 12.1

QUESTIONS for Health Physics Branch (CHPB)

12.01-1

10 CFR 20.1101 and NEI 07-03

The applicant's FSAR Sections 12.1 and 12.5 includes a commitment to the use of the NEI Template 07-03, Generic FSAR Template Guidance for Radiation Protection Description to describe, at the functional level, elements of the radiation protection program required by 10 CFR 20.1101. The applicant is requested to update the commitment of FSAR Section 12.5 to reference the final version of this template (or otherwise update the FSAR to address any differences from this final template version), consistent with Regulatory Guide 1.206 and Section 12.5 of the Standard Review Plan (NUREG 0800), or justify an alternative. Accordingly, the applicant is also requested to update all internal citations to the final NEI Template 07-03 in applicable FSAR subsections and references.

12.01-2

10 CFR 20 and RG 1.206

The applicant's FSAR, Section 12.1, includes a commitment on the use of guidance for ensuring that occupational radiation exposures are as low as is reasonably achievable (ALARA), based on draft NEI Template 07-08 "Generic FSAR Template Guidance for Ensuring that Occupational Radiation Exposures are as Low as is Reasonably Achievable (ALARA)", which is currently under NRC staff review. This NEI template discusses operational policies and operational considerations to ensure that occupational radiation exposures are ALARA.

Should the NRC staff accept NEI Template 07-08, please revise and update the FSAR to reflect the use of the final version of this template (or otherwise update the FSAR to address any differences for consistency with an approved template). Accordingly, the applicant is requested to also update all internal citations to the final approved NEI Template 07-08 in applicable FSAR subsections and references.

12.01-3

10 CFR 20.1101

COL Information Item 12.1(3), Operational Radiation Protection Program, references several Regulatory Guides (RGs) which are outdated according to the consolidated guidance of NUREG 1736, and are not mentioned in NEI 07-03 or NEI 07-08. Please revise COL item 12.1(3) so that RGs 8.20 and 8.32 are deleted from the listing of RGs, and that RGs 1.206 and 4.21 are added to the listing of RGs.

The applicant is requested to revise and update the Comanche Peak Nuclear Power Plant FSAR to add references to RG 1.206, RG 4.21 and to delete references to RG 8.20 and 8.32, or describe and justify the alternate approaches used.

12.01-4

10 CFR 20.1406

The applicant's FSAR, Sections 12.1 and 12.5 do not include a commitment to the use of Guidance for Life-Cycle Minimization of Contamination, based on draft NEI Template 08-08 "Generic FSAR Template Guidance for Life-Cycle Minimization of Contamination", which is currently under NRC staff review. This NEI template discusses operational policies and operational programs to ensure that meet the programmatic requirements of 10 CFR 20.1406 for life cycle minimization of contamination, in part by addressing the applicable regulatory position elements of Regulatory Guide 4.21.

The applicant is requested to revise and update the COL FSAR to describe:

1. The applicant's position with respect to that adoption of NEI template 08-08.
2. If the applicant decides to fully adopt NEI 08-08, then should the staff accept NEI Template 08-08, please update the COL FSAR to reflect the use of the final version of this template,
3. If the applicant decides to adopt portions of NEI 08-08 then the applicant is requested to revise and update the FSAR to address any differences with an approved template, and the alternate applicant methods of ensuring compliance with the intent of the guidance provided in RG 4.21.
4. Update the COL FSAR to include the COL Applicant data items specified within NEI 08-08.

Alternately using acceptable guidance, Luminant may provide a description, and associated justification, of all the operational programs and COL information items necessary to demonstrate how the application meets the requirements of 10 CFR 20.1406.