

**From:** Naquin, Tyrone  
**Sent:** Tuesday, November 10, 2009 1:25 PM  
**To:** Wyatt Padgett (LES); Stephen Cowne (LES); Don Dotson (CTR)  
**Cc:** Smith, Brian; Wescott, Rex; Roman, Cinthya  
**Subject:** LAR 09-14 Comments to RAI Response

As a follow-up to our telephone call of November 6, 2009, the following comments are provided to assist in development of supplemental information relevant to the LAR:

### **OC1-1**

LES states that IROFS36e applies to construction vehicles allowed on the pad. IROFS36e does not apply to vehicles not on the pad. If IROFS50 should fail, then the sloped concrete pad portion of IROFS36e should help to lessen the likelihood that a resulting fire may breach a cylinder. Because of this more limited application of IROFS36e to preventing a consequence, the FPIN of 36e should be reduced from -3 to -2.

The crash data provided was inadequate to warrant an FPIN of -2. Unless a larger data set is available for justification, an initiation index of -1 only would be acceptable.

In regard to IROFS50, the acceptable choices of barriers should be substantial enough, such that encountering the barrier will get the attention of the driver. The barrier must be effective for the specific situation being planned for.

Contact with a UF6 component is a Failure of IROFS50, as opposed to including a release. LES agreed.

### **OC2-1**

A better developed description of the types of construction sequences for OC-2 is needed, to possibly include separate sections to clarify the process for indoor work, outdoor work, and outdoor crane work.

In regard to IROFS50, the acceptable choices of barriers should be substantial enough, such that encountering the barrier will get the attention of the driver. The barrier must be commensurate for the specific situation being planned for.

Describe how the functional attributes of IRFS51, identified in your response, will be applied? What dictates consideration for inclusion/exclusion of the attributes and requirements listed?

It is unclear whether or not you are attempting to establish the independence of IROFS50 and IROFS51. Consider other reliability qualities of your IROFS.

### **For the ISA**

The NRC agrees that temporary systems are not construction activities and the specific contents of LAR 09-14, did not per se, include ISA Rev. 10 (which was submitted as separate correspondence). Rev 10 had limited applicability to the the phased aspect of LAR 09-14. It is understood that Revision 10 has been superseded by the November 3, 2009 correspondence

on the 'Phased Approach.' The ISA submitted under this correspondence will be reviewed in detail for adequacy as it applies to temporary systems.

TDN

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