



December 2, 2009

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Duane Arnold Energy Center
Docket 50-331
License No. DPR-49

Response to Request for Additional Information Regarding the Duane Arnold Energy Center License Renewal Application - Scoping and Screening Review

- References:
1. Letter, Richard L. Anderson (FPL Energy Duane Arnold, LLC) to Document Control Desk (USNRC), "Duane Arnold Energy Center Application for Renewed Operating License (TSCR-109)," dated September 30, 2008, NG-08-0713 (ML082980623)
 2. Letter, Richard L. Anderson (FPL Energy Duane Arnold, LLC) to Document Control Desk (USNRC), "License Renewal Application, Supplement 1: Changes Resulting from Issues Raised in the Review Status of the License Renewal Application for the Duane Arnold Energy Center," dated January 23, 2009, NG-09-0059 (ML090280418)
 3. Letter, Brian K. Harris (USNRC) to Christopher Costanzo (NextEra Energy Duane Arnold, LLC), "Request for Additional Information for the Review of the Duane Arnold Energy Center License Renewal Application - Scoping and Screening Review (TAC No. MD9769)," dated November 2, 2009 (ML092870453)

By Reference 1, FPL Energy Duane Arnold, LLC submitted an application for a renewed Operating License (LRA) for the Duane Arnold Energy Center (DAEC). Reference 2 provided Supplement 1 to the application. By Reference 3 the U.S. Nuclear Regulatory Commission (NRC) Staff requested additional information for the review of the LRA.

The NextEra Energy Duane Arnold, LLC, responses to the Staff's requests for additional information are provided in Enclosure 1.

During the NRC Region III license renewal inspection conducted November 2 - 20, 2009, it was determined that clarifications should be provided for selected scoping information provided in the LRA. Enclosure 2 provides clarifications regarding the identification of systems, structures and commodity groups; and for mechanical systems and structures that are not in scope.

A137
NRR

Document Control Desk
NG-09-0823
Page 2

This letter contains no new commitments or changes to existing commitments.

If you have any questions or require additional information, please contact Mr. Kenneth Putnam at (319) 851-7238.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2009.



Christopher R. Costanzo
Vice President, Duane Arnold Energy Center
NextEra Energy Duane Arnold, LLC

Enclosures: 1. DAEC Responses to NRC Requests for Additional Information
2. LRA Clarifications Resulting from NRC Region III License Renewal Inspection

cc: Administrator, Region III, USNRC
Project Manager, DAEC, USNRC
Senior Resident Inspector, DAEC, USNRC
License Renewal Project Manager, USNRC
License Renewal Inspection Team Lead, Region III, USNRC
M. Rasmusson (State of Iowa)

Enclosure 1 to NG-09-0823
DAEC Responses to NRC Requests for Additional Information

RAI 2.1-1

Pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 54.4(a)(1), the applicant must consider all safety-related systems, structures and components (SSCs) relied upon to remain functional during and following a design basis event (DBE) to ensure the following functions: (1) the integrity of the reactor coolant pressure boundary; (2) the ability to shut down the reactor and maintain it in a safe shutdown condition; or (3) the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR Part 100.11.

As discussed, during the scoping and screening methodology audit performed on-site August 24-28, 2009, the staff determined that the applicant had not included certain components, classified as safety-related in the equipment database, within the scope of license renewal in accordance with 10 CFR 54.4(a)(1).

The staff requests that the applicant perform a review of the issue and provide the basis for not including certain components, classified as safety-related in the equipment database, within the scope of license renewal in accordance with 10 CFR 54.4(a)(1). Indicate if the review concludes that use of the scoping methodology precluded: (1) the identification of safety-related SSCs which should have been included within the scope of license renewal in accordance with 10 CFR 54.4(a)(1), and (2) the identification of nonsafety-related SSCs that could interact with safety-related SSCs, and which were not specifically exempted by your current licensing basis (CLB), and therefore should have been considered within the scope of license renewal in accordance with 10 CFR 54.4(a)(2). Describe any additional scoping evaluations to be performed to address the 10 CFR 54.4(a)(1) and (a)(2) criteria. As part of your response, list any additional SSCs included within the scope as a result of your efforts, and list those structures and components for which aging management reviews were conducted. For each structure and component, describe the aging management programs, as applicable, to be credited for managing the identified aging effects.

DAEC Response to RAI 2.1-1

This question resulted from an NRC review of selected license renewal database entries during the on-site Scoping and Screening audit.

As discussed in LRA section 2.1.1.1, the license renewal database was populated with the component identification nomenclature and quality classification data that existed in the plant equipment database. DAEC has performed a review of the license renewal database to identify components which showed a safety related classification, as downloaded from the plant equipment database, but were not processed in the license renewal database as being in the scope of license renewal for 10 CFR 54.4(a)(1). With the three exceptions noted below, the review determined that the safety related components had been processed correctly in the license renewal database.

Enclosure 1 to NG-09-0823
DAEC Responses to NRC Requests for Additional Information

For those components which were shown as being safety related in the plant equipment database but were not processed in the license renewal database as being in scope under 10 CFR 54.4(a)(1), the basis for their evaluation satisfied one of the following criteria:

- The component had been broken down into subcomponents to facilitate aging management review. These subcomponents were then processed in place of the parent component as being in the scope of license renewal and subject to aging management review. The component in question had not actually been excluded from the scope of 10 CFR 54.4 (a)(1).
- The component is a subcomponent of another component and was evaluated as part of the parent component as being in the scope of license renewal and subject to aging management review. The component in question had not actually been excluded from the scope of 10 CFR 54.4 (a)(1).
- The component was assigned to be part of a commodity. The commodity is in the scope of license renewal and subject to aging management review. The component in question had not actually been excluded from the scope of 10 CFR 54.4 (a)(1).
- The component was classified as safety related at the time its information was downloaded to the license renewal database, but, prior to LRA submittal, it was reclassified as non-safety related using the appropriate DAEC site process. The component was evaluated as having no license renewal intended function for 10 CFR 54.4(a)(1), (a)(2) or (a)(3).
- The component identification nomenclature was in the plant equipment database and classified as safety related; however, it was either a spare component that is not installed in a system or it did not exist. Therefore, it was evaluated to have no license renewal intended function for 10 CFR 54.4(a)(1), (a)(2) or (a)(3).
- The component was in the plant equipment database and classified as safety related; however, it has been abandoned in place (isolated and drained). The component was, therefore, evaluated to provide no license renewal intended function for 10 CFR 54.4(a)(1), (a)(2) or (a)(3).
- The component was in the plant equipment database and classified as safety related, but the component is part of the non-safety related instrument air system that supplies air to a fail-safe safety related component. The component was evaluated to provide no license renewal intended function for 10 CFR 54.4(a)(1), (a)(2) or (a)(3).
- The component was originally procured and classified as safety related in the equipment database. However, the safety function of the system in which the component is installed has since been amended in the DAEC licensing basis and is no longer required by DAEC Technical Specifications. The component was evaluated to have no license renewal intended function for 10 CFR 54.4(a)(1), (a)(2) or (a)(3).

During the review, the following safety related components were identified to have been inadvertently omitted from aging management review. The scoping and screening documents and the aging management review documents have been updated to classify these components as within the scope of license renewal and subject to aging

Enclosure 1 to NG-09-0823
DAEC Responses to NRC Requests for Additional Information

management review. The components have been included in aging management programs as required. The license renewal application was reviewed for a potential impact from these changes. No LRA changes are required to reflect the scoping, screening and aging management review results for these additional components since the existing LRA information already encompasses these components, materials, environments, and aging management program assignments.

Standby Diesel Generators (SBDG) and Diesel Oil Systems

TW3271B – Thermowell for B SBDG Lube Oil inlet temperature indicator. This carbon steel component will be managed internally by the Lubricating Oil Analysis and One-Time Inspection Programs and externally by the External Surfaces Monitoring Program.

Primary Containment System

MO1900 and MO1900-O – Reactor Head Spray isolation valve and operator. The supply line and reactor head spray line have been cut and capped and are no longer used for reactor head spray. The valve, however, does provide a primary containment license renewal intended function. MO1900-O screened as an active component and is not subject to AMR. MO-1900 (carbon steel body) is exposed to an external environment of air - indoor uncontrolled and is managed externally by the External Surfaces Monitoring Program.

Containment Atmosphere Control System

FCV4301A, FCV4303A, V43-0521, V43-0522, V43-0523, V43-0583, V43-0584, V43-0585 and V43-0610 are all copper alloy valves (body) that provide a pressure boundary for the safety related air system. This system provides control air for the Containment Atmosphere Control System. The internal environment for these valves is dried air, and there are no aging effects. The external environment is air - indoor uncontrolled, and there are no aging effects.

V43-0535 and V43-0536 are stainless steel valves (body) that provide a pressure boundary for the safety related air system. This system provides control air for the Containment Atmosphere Control System. The internal environment is dried air and the external environment is air - indoor uncontrolled. Neither of these environments has any aging effects for stainless steel, so the valve bodies are not assigned to an aging management program.

RAI 2.1-2

Pursuant to 10 CFR 54.4(a)(2), the applicant must consider all nonsafety-related SSCs, whose failure could prevent the satisfactory accomplishment of safety-related functions, for SSCs relied on to remain functional during and following a DBE to ensure (1) the integrity of the reactor coolant pressure boundary; (2) the ability to shut down the reactor and maintain it in a safe shutdown condition; or (3) the capability to prevent or

Enclosure 1 to NG-09-0823
DAEC Responses to NRC Requests for Additional Information

mitigate the consequences of accidents that could result in potential offsite exposures comparable to those referred to in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2), or 10 CFR 100.11. The license renewal application stated that the applicant had used the guidance contained in Appendix F, of NEI 95-10, "Industry Guidelines for Implementing the Requirements of 10 CFR Part 54 - The License Renewal Rule," (NEI 95-10) to identify the nonsafety-related SSCs to be included within the scope of license renewal in accordance with 10 CFR 54.4(a)(2).

- (A) As discussed, during the scoping and screening methodology audit, performed on-site August 24-28, 2009, the staff determined that certain nonsafety-related tubing, which is a portion of a nonsafety-related piping system attached to safety-related SSCs, had not been included within the scope of license renewal. The applicant indicated that the interface between the pipe and the tubing identified the boundary of the nonsafety-related component to be included within the scope of license renewal (the pipe was included while the tubing was not). The staff requests that the applicant perform a review of the issue and provide the basis for not including certain nonsafety-related tubing, which is a portion of a nonsafety-related piping system attached to safety-related SSCs, within the scope of license renewal in accordance with 10 CFR 54.4(a)(2).
- (B) During the scoping and screening methodology audit, performed on-site August 24-28, 2009, the staff determined that the nonsafety-related trash bars and trash rake 1S-83, located adjacent to or within the safety-related intake structure, had not been included within the scope of license renewal. The staff requests that the applicant perform a review of the issue and provide the basis for not including the trash bars and trash rake 1S-83, located adjacent to or within the safety-related intake structure, within the scope of license renewal in accordance with 10 CFR 54.4(a)(2).

Indicate if the review concludes that use of the scoping methodology precluded the identification of nonsafety-related SSCs that could interact with safety-related SSCs, and which were not specifically exempted by your CLB, and therefore should have been considered within the scope of license renewal in accordance with 10 CFR 54.4(a)(2). Describe any additional scoping evaluations to be performed to address the (a)(2) criteria. As part of your response, list any additional SSCs included within the scope as a result of your efforts, and list those structures and components for which aging management reviews were conducted. For each structure and component, describe the aging management programs, as applicable, to be credited for managing the identified aging effects.

DAEC Response to RAI 2.1-2

Part A

Spatial Interactions from Liquid-Filled Tubing and Piping

As discussed in LRA Section 2.1.2.2.c, non-safety related liquid-filled tubing or piping which could produce spatial interactions with safety related components is in scope for license renewal.

Enclosure 1 to NG-09-0823
DAEC Responses to NRC Requests for Additional Information

Non-Safety Related Piping Connected to Safety Related Piping

For non-safety related piping directly connected to safety related piping, as discussed in LRA Section 2.1.2.2.2.b, the in-scope boundary for license renewal extends beyond the safety/non-safety interface into the non-safety related portion of the piping and supports up to and including the first equivalent anchor. Therefore, non-safety related piping which is attached to safety related piping, whether filled with liquid or air/gas, is in scope for license renewal for the structural integrity function out to the first seismic anchor or equivalent anchor.

Non-Safety Related Tubing Connected to Safety Related Piping

For non-safety related tubing that is directly connected to safety related piping, LRA Section 2.1.2.2.2.b states that, if the tubing is not air/gas filled (i.e., contains liquid), it is automatically in scope for 10 CFR 54.4(a)(2) unless it is located in a room that does not contain safety related components. This is consistent with the discussion in LRA Section 2.1.2.2.2.c. However, if the non-safety related tubing that is attached to a safety related pipe is filled with air/gas (i.e., does not contain liquid), it is not in scope for the structural integrity function. This is because the ratio of the moment of inertia of the piping to the moment of inertia of the tubing is equal to or greater than the acceptable ratio, defined by the CLB, at which the tubing does not impose loads on either the larger piping or the piping supports.

It has been determined that the discussion about tubing in LRA Section 2.1.2.2.2.b should be clarified. Accordingly, in Section 2.1.2.2.2.b, the second bullet, Small Bore Lines Attached To Safety Related Large Bore Lines Or Equipment, is revised in its entirety to read as follows:

- Small Bore Lines Attached To Safety Related Large Bore Lines Or Equipment

Small bore lines attached to the safety related portion of large bore lines or safety related equipment are typically safety related to the first isolation valve and non-safety related thereafter. Most of these small bore lines are either drain or vent lines. In addition, many of these lines have no supports (i.e., they are cantilevered). In these instances, the entire line is in scope for license renewal. The drain and vent lines that do have supports generally run to a nearby drain. Again, the entire run of piping and its supports are in scope for license renewal.

In some instances, the small bore non-safety related piping has no seismic anchors. In those instances, the in-scope portion was extended "sufficiently far" from the safety related portion such that the non-safety related piping beyond that point would not have a significant effect on the safety related portion. The definition of "sufficiently far" is the same as for large bore piping, i.e., a minimum of two levels of support in each orthogonal direction.

Enclosure 1 to NG-09-0823
DAEC Responses to NRC Requests for Additional Information

Small bore lines may transition into tubing. For non-safety related tubing that is directly connected to safety related piping, if the tubing contains liquid it is automatically in scope for 10 CFR 54.4(a)(2) unless it is located in a room that does not contain safety related components. This is consistent with the discussion in Section 2.1.2.2.c. However, if the non-safety related tubing that is directly connected to a safety related pipe is filled with air/gas (i.e., does not contain liquid), it is not in scope for the structural integrity function. This is because the moment of inertia ratio of the piping to the tubing is equal to or greater than the acceptable ratio, defined by the CLB, at which the tubing does not impose loads on either the larger piping or the piping supports.

The review did not identify any additional SSCs that should be included in scope. Therefore, no additional evaluations are needed to address 10 CFR 54.4(a)(2) criteria.

Part B

Trash Bars

As discussed in the response to RAI 2.3.3.11-5 in letter NG-09-0646 dated September 3, 2009, the river water supply trash bars are located outboard of the traveling screens and provide a non-safety related function to minimize the potential for large debris to enter the traveling screen bays. The low approach velocity of the river water supply, in itself, minimizes the potential for large debris to be drawn into the traveling screens. In addition, the low velocity ensures that any parts that might be postulated to fail and fall off the trash bars would only fall vertically to the river bed or floor of the intake structure and would not affect the operation of the downstream safety related river water supply traveling screens.

A search of DAEC operating experience found no previous history of aging or damage identified on the intake structure trash bars. A search of industry operating experience did identify plants that had experienced damage to their intake trash bars. One plant identified debris that had entered its intake structure after a portion of its trash bars had corroded and failed. Another plant had a trash bar failure due to high differential pressure from the accumulation of gracilaria (algae) on the bottom of its trash bars. Both of these plants had trash bars that were exposed to a harsh sea water environment. In addition, both of these plants have the entire circulating water flow pass through the trash bars which would greatly exacerbate both the potential for trash buildup and the potential for trash bar failure due to high differential pressures.

At Duane Arnold, the maximum required flow for rated emergency service water and residual heat removal service water pump operation is provided by one river water supply pump per side. The flow rate of 6000 gallons per minute from one river water supply pump per side in the intake structure would provide an approach velocity at the trash bars of approximately 0.375 feet per second at minimum river levels. This low velocity minimizes the potential for large debris to be drawn into the flow path and damage the traveling water screens. One river water supply pump can provide the rated flow of both installed fire pumps (located in the pumphouse) in the unlikely event additional water volume is needed beyond the wet pit.

Enclosure 1 to NG-09-0823
DAEC Responses to NRC Requests for Additional Information

The DAEC trash bars are exposed to a non-harsh river water and atmosphere environment. During normal plant operation, they experience only the flow required to make up for cooling tower evaporation and drift, approximately equivalent to the 6000 gallon per minute requirements of the Emergency Service Water and Residual Heat Removal Service Water Systems during emergency conditions.

Therefore, the non-safety related trash bars do not provide a license renewal intended function as defined in 10 CFR 54.4(a)(1), (2) or (3). The trash bars are not subject to aging management review and are not listed in the LRA tables.

Trash Rake

The trash rake at Duane Arnold, 1S083, is a non-safety related component with a non-safety related function to "provide removal of trash from the inlet to the intake structure." This trash rake has not historically been needed to remove a trash accumulation on the trash bars. With the low inlet approach velocity of approximately 0.375 feet per second, there is not enough flow to pull debris into the trash bars; as a result, the trash rakes have not been needed or used to prevent an adverse affect on safety related functions.

Therefore, the non-safety related trash rake at Duane Arnold does not provide a license renewal intended function as defined in 10 CFR 54.4(a)(1), (2) or (3). The trash rake is not subject to aging management review and is not listed in the LRA tables.

It should be noted that the river water supply intake traveling screens are safety related components with an intended function to remove debris from the water supply to the safety related emergency service water and residual heat removal service water pumps. As discussed in LRA Section 2.3.3.16, Intake and Traveling Screens, the river water supply traveling screens are in the scope of license renewal and are screened as subject to aging management review.

The review did not identify any additional SSCs that should be included in scope. Therefore, no additional evaluations are needed to address 10 CFR 54.4(a)(2) criteria.

Enclosure 2 to NG-09-0823

LRA Clarifications Resulting from NRC Region III License Renewal Inspection

System, Structure, and Commodity Group Identification

The NRC Region III license renewal inspection team requested that the LRA discussion about license renewal systems be expanded to address the reassignment of components from one license renewal system to another. Accordingly, the following LRA changes are made:

In LRA Section 2.1.2.1, System, Structure, and Commodity Group Identification, on page 2.1-7, the discussion under the heading Systems is revised in its entirety to read as follows:

Systems

The plant equipment database has each structure, system and component (SSC) binned in system identifier codes called Startup System Numbers (SUS numbers). These Startup Systems were used as the starting point to identify the systems for license renewal.

License renewal systems were defined to account for all of the plant Startup Systems that contain permanently installed equipment in the equipment database. License renewal systems generally correspond to the plant Startup Systems, except that some license renewal systems represent a group of plant Startup Systems with similar intended functions that were combined together for evaluation. In most cases the assignments of individual components to license renewal systems were consistent with their assignments to plant Startup Systems in the equipment database. Occasionally, selected components that are physically installed in one plant Startup System were assigned to a different license renewal system or a commodity group to logically group components with common characteristics. The final license renewal system boundaries and component assignments to systems and commodity groups were established to maximize the efficiency of screening, aging management review and aging management program assignment. For example, all ventilation system fire dampers, regardless of their plant system affiliation, are logically grouped as part of the Fire Protection System. The aging management review results for fire dampers are addressed in LRA Table 3.3.2-11. Similarly, all pipe supports, regardless of system affiliation, are logically grouped as the commodity, Supports. The aging management review results for supports are addressed in LRA Table 3.5.2-10.

As discussed in Section 2.1.2.2 below, final scoping decisions were made at an individual structure or component level based on whether or not each structure or component had a license renewal intended function. Scoping decisions for individual components were not based solely on the system level scoping classification. The license renewal database contained appropriate controls to assure that all the individual components in the database were evaluated and, where necessary, assigned to an appropriate aging management program, regardless of system affiliation.

Enclosure 2 to NG-09-0823

LRA Clarifications Resulting from NRC Region III License Renewal Inspection

Other information sources, such as the current licensing basis, were also electronically searched using several keywords (e.g., system, new system, system modification) to ensure all plant systems were evaluated for license renewal intended functions regardless of their coverage in the plant equipment database.

In LRA Section 2.2, Plant Level Scoping Results, on page 2.2-1, the discussion is revised in its entirety to read as follows:

Duane Arnold's integrated plant assessment methodology consists of scoping, screening, and aging management reviews. This section provides the plant level scoping results achieved when applying the scoping methodology described in LRA Subsection 2.1.2 to the license renewal systems and structures. LRA Table 2.2-1 lists the mechanical systems that are in scope. LRA Table 2.2-2 lists the mechanical systems that are not in scope. LRA Table 2.2-3 lists the buildings/structures that are in scope. LRA Table 2.2-4 lists the buildings/structures that are not in scope. LRA Table 2.2-5 lists the electrical / instrumentation and controls (I&C) systems that are in scope. LRA Table 2.2-6 lists the electrical / instrumentation and controls (I&C) systems that are not in scope. If a license renewal system or structure, in whole or in part, meets one or more of the license renewal scoping criteria, the system or structure is considered to be within the scope of license renewal. Included in the tables are references to the sections in this application that discuss screening results for in-scope systems and structures.

For license renewal, as discussed in Section 2.1.2.1, some of the systems and structures identified in the plant equipment database were combined to provide a more logical method of evaluation. LRA Tables 2.2-1 and 2.2-3 identify plant systems and buildings/structures, respectively, which have been combined for license renewal processing.

Enclosure 2 to NG-09-0823

LRA Clarifications Resulting from NRC Region III License Renewal Inspection

Plant Level Scoping Results for Mechanical Systems and Structures Not In Scope

The NRC Region III license renewal inspection team requested that certain entries in the LRA Section 2.2 tables for mechanical systems and structures determined not to be in scope for license renewal, be clarified to better explain the basis for the conclusion that they were not in scope. Accordingly, changes are made in LRA Tables 2.2-2 and 2.2-4 as follows.

LRA Table 2.2-2

In LRA Table 2.2-2, Plant Level Scoping Results - Mechanical Systems - Not in Scope, on pages 2.2-5 through 2.2-8, the following line items are revised.

The Containment Atmosphere Dilution System line item on page 2.2-5 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Containment Atmosphere Dilution (CAD) System	No	Original function was to maintain the oxygen concentration below the flammability limit of 5% following an accident. The CAD System was removed from service per License Amendment 265 issued June 28, 2007 (ML071420246). The CAD System is "abandoned in place." Only the primary containment isolation function is being maintained. In-scope components are evaluated as part of the Containment Atmosphere Control System.

The Containment Hardened Wetwell Vent line item on page 2.2-5 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Containment Hardened Wetwell Vent	No	Facilitate the venting of primary containment when the primary containment pressure limit is threatened (beyond design basis event). In-scope Containment Hardened Wetwell Vent components are evaluated as part of the Containment Atmosphere Control system.

Enclosure 2 to NG-09-0823

LRA Clarifications Resulting from NRC Region III License Renewal Inspection

The Low Level Radwaste Processing and Storage Facility Kaman Radiation Monitor line item on page 2.2-6 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Low Level Radwaste Processing and Storage Facility Kaman Radiation Monitor	No	Provides a clear indication whenever abnormal amounts of radioactivity exist in the LLRWSF facility and prompts operator actions.

The Service Air System line item on page 2.2-7 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Service Air system	No	Provides a continuous supply of dry oil-free compressed air for general plant services as required. Service Air components with an isolation function are in scope but are evaluated as part of the Instrument Air System.

The Stack Gas Radiation Monitor System line item on page 2.2-8 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Stack Gas Kaman Radiation Monitor System	No	Provides a clear indication whenever limits on the release of radioactive material to the environs are reached or exceeded.

The Offgas Recombiner System line item on page 2.2-8 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Offgas Recombiner System	No	Recombine radiolytically dissociated hydrogen and oxygen. Recombination substantially reduces the volume of off-gas.

Enclosure 2 to NG-09-0823

LRA Clarifications Resulting from NRC Region III License Renewal Inspection

The Reactor Building Kaman Radiation Monitor System line item on page 2.2-8 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Reactor Building Kaman Radiation Monitor System	No	Provides a clear indication whenever abnormal amounts of radioactivity exist in the reactor building main exhaust stacks and prompts operator actions.

The Turbine Building Kaman Radiation Monitor System line item on page 2.2-8 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Turbine Building Kaman Radiation Monitor System	No	Provides a clear indication whenever abnormal amounts of radioactivity exist in the turbine building ventilation roof vents and prompts operator actions.

LRA Table 2.2-4

In LRA Table 2.2-4, Plant Level Scoping Results - Buildings / Structures - Not in Scope, on pages 2.2-10 through 2.2-16, the following line items are revised.

The Containment Atmosphere Dilution (CAD) Charge House line item on page 2.2-11 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Containment Atmosphere Dilution (CAD) Charge House	No	The CAD Charge House is a metal sided structure, with wood and corrugated sheet metal roof. The structure is on a rectangular reinforced concrete footing and slab on grade. It houses the compressor for the CAD system. The CAD system was removed from service per License Amendment 265.

Enclosure 2 to NG-09-0823
LRA Clarifications Resulting from NRC Region III License Renewal Inspection

The CAD Valve House line item on page 2.2-11 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
CAD Valve House	No	The CAD Valve House is an aluminum prefabricated square structure. The structure is on a rectangular reinforced concrete footing and slab on grade. It houses valves for the CAD system. The CAD system was removed from service per License Amendment 265.

The Liquid Nitrogen Tank Foundation line item on page 2.2-12 is revised to appear as follows:

Building / Structure Name	In License Renewal Scope	Function/UFSAR Reference
Liquid Nitrogen Tank Foundation	No	The Liquid Nitrogen Tank is supported on a concrete foundation slab at grade. It provides nitrogen to CAD compressor and containment. The CAD system was removed from service per License Amendment 265.