

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Sunday, January 17, 2010 2:16 PM
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Cc: ComanchePeakCOL Resource; Otto, Ngola
Subject: Comanche Peak RCOL Section 14.2 - RAI Number 129
Attachments: RAI 4209 (RAI 129).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 January 17, 2010.

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

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Email Number: 786

Mail Envelope Properties (9C2386A0C0BC584684916F7A0482B6CA0B7A45DDED)

Subject: Comanche Peak RCOL Section 14.2 - RAI Number 129
Sent Date: 1/17/2010 2:15:52 PM
Received Date: 1/17/2010 2:15:54 PM
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Files	Size	Date & Time
MESSAGE	652	1/17/2010 2:15:54 PM
RAI 4209 (RAI 129).doc	32250	

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

Request for Additional Information No. 4209 (RAI) COLA Revision 1

RAI No. 129

1/17/2010

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

SRP Section: 14.02.01 - Generic Guidelines for Extended Power Uprate Testing Programs 08/2006
Application Section: 12.2

QUESTIONS for Health Physics Branch (CHPB)

14.02.01-1

10 CFR 20.1501, NUREG-0800, Standard Review Plan, Section 14.02

In RAI No. 3593 (CP RAI # 86), Question 14.02-14, the NRC staff asked the applicant to change the combined license (COL) final safety analysis report (FSAR) to reflect the use of consensus standards as part of the bases for determining the method of calibrating portable radiation protection (RP) instrumentation, and the RP laboratory instrumentation. Regulatory Guide 1.206, Section C.I.12.5.2.1 "Equipment and Instrumentation" notes that the Applicant is to describe the calibration methods for portable and laboratory technical equipment and instrumentation.

NRC Information Notice No. 93-30: "NRC Requirements for Evaluation of Wipe Test Results; Calibration of Count Rate Survey Instruments" notes that the licensee must demonstrate that the instrument is calibrated to make measurements and sufficiently sensitive to meet the applicable regulatory requirements in 10 CFR Parts 20. Calibration information can be found in the instrument manufacturer's guidance, however, the licensee, not the instrument manufacturer, is responsible for demonstrating that the instrument and method used are sensitive enough to meet NRC regulatory requirements.

In response to the NRC staff's RAI # 86, the applicant noted that the radiation protection program described in COLA FSAR Section 12.5 references NEI 07-03A, which in turn references the appropriate consensus standards. It is not clear which consensus standards the Applicant will utilize to define the calibration methods for the following types of RP instrumentation and standards:

- Portable radiation survey instruments
- Laboratory Proportional detectors
- Laboratory scintillation detectors
- High Resolution Gamma spectroscopy systems
- Whole Body counting systems
- Portal radiation monitors
- Portable Continuous Air Monitoring
- Personnel Contamination Monitors

- Personnel Electronic dosimeters
- Portable RP Instrument calibration facility sources and standards

Therefore, the applicant is requested to update and revise COL FSAR Section 14.2.12.1.112 to reflect that the applicant will use of consensus standards, in addition to vendor recommendations, as part of the guidance for determining the method of calibration of portable and laboratory radiation protection instrumentation, or describe an alternate approach and the associated justification.