

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Thursday, January 21, 2010 4:01 PM
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Cc: ComanchePeakCOL Resource; Otto, Ngola
Subject: Comanche Peak RCOL Chapter 13.7 - RAI Number 133
Attachments: RAI 4207 (RAI 133).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 January 21, 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

Hearing Identifier: ComanchePeak_COL_Public
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RAI 4207 (RAI 133).doc		34298

Options

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Request for Additional Information (RAI) No. 4207 COLA Revision 1

RAI Number 133

1/21/2010

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

SRP Section: 12.03-12.04 - Radiation Protection Design Features
Application Section: 12.4

QUESTIONS for Health Physics Branch (CHPB)

12.03-12.04-9

10 CFR 20.1101, 1301, 1302, NUREG-0800, 'Standard Review Plan,' Section 12.03-12.04

In RAI No. 3318 (RAI # 119), Question 12.03-12.04-8 (13150), the NRC staff asked the Applicant to change the combined license (COL) final safety analysis report (FSAR) to better define the as low as reasonably achievable (ALARA) program for construction workers.

The requirement of 10 CFR 20.1301(a)(1) is "The total effective dose equivalent to individual members of the public from the licensed operation does not exceed 0.1 rem (1 mSv) in a year," and 10 CFR 20.1101(b) requires exposure to members of the public be as low as reasonably achievable (ALARA). In response to the NRC staff's RAI, the Applicant noted that they would continually monitor construction worker dose during construction, they would take the actions appropriate to maintain exposure ALARA, and they would ensure protection of construction workers to radiation exposure from radiography sources and radioactive materials. However, since the Radiation Protection milestones described in COL FSAR Table 13.4-201 do not require any Radiation Protection program elements until the receipt of radioactive sources under the COL License, the NRC staff is unable to determine who has responsibility for monitoring and controlling cumulative construction worker dose resulting from activities of diverse licensees.

The Applicant is requested to update and revise COL FSAR Section 12.4 to describe how the Applicant will meet the requirements of § 20.1101, 1301 and 1302 to control, limit and monitor exposure to members of the public involved in the construction of CPNPP, Units 3 and 4.

12.03-12.04-10

10 CFR 20.1101, 1301, 1302, NUREG-0800, SRP Section 12.03-12.04

In RAI No. 3318 (RAI# 119), Question 12.03-12.04-5 (13147), the NRC staff asked the Applicant to change the combined license (COL) final safety analysis report (FSAR) to better define the sources of radiation exposure to the construction workers, and to clarify the placement of area monitoring dosimetry used to monitor construction worker exposure.

In response to the NRC staff's RAI, the Applicant noted that they would keep construction worker exposures less than 2 mrem/hr in accordance with the current Radiation Protection Program, STA 650 "General Health Physics Plan" and that monitoring construction worker exposure is unnecessary because limiting construction worker exposure to 2 mrem/hr is as low as reasonably achievable (ALARA). However, controlling construction worker to exposure to dose rates less than 2 mrem/hr does not address § 20.1301(a)(1), which limits doses to members of the public to 100 mrem (1 milli Sv) in a year, nor does it address the requirements of § 20.1101(b), which requires exposure to members of the public be ALARA. The Applicant further noted that construction worker dose will be maintained ALARA in accordance with the Radiation Protection Milestones noted in COL FSAR Table 13.4-201. However, prior to fuel receipt, Table 13.4-201 only requires those Radiation Protection program elements necessary to support COL Licensee receipt of sources. Since the location of the exposure monitoring TLDs are not adequately described in the COL FSAR, the NRC staff is unable to determine that the Applicant is meeting the requirements of § 20.1302(a) to perform surveys sufficient to demonstrate that exposure to members of the public meet the public dose limits of §20.1301(a)(1). Additionally, based on the available information, the NRC staff is unable to determine that the provisions of STA 650 adequately address the requirements of § 20.1101(b) to maintain construction worker radiation exposure ALARA, and § 20.1301(a)(1), which limits doses to members of the public to 100 mrem.

The Applicant is requested to update and revise COL FSAR Section 12.4 to describe how the Applicant will meet the requirements of § 20.1101, 1301 and 1302 to control, limit and monitor exposure to members of the public involved in the construction of CPNPP Units 3 and 4.