

CCNPP3COLA NPEmails

From: Arora, Surinder
Sent: Friday, January 22, 2010 12:32 PM
To: 'Poche, Robert'; 'cc3project@constellation.com'
Cc: CCNPP3COL Resource; Dehmel, Jean-Claude; Roach, Edward; Colaccino, Joseph; Jennings, Jason; Biggins, James; Vrahoretis, Susan; Hair, Christopher
Subject: DRAFT RAI No. 207 CHPB 4191
Attachments: DRAFT RAI 207 CHPB 4191.doc

Rob,

Attached is DRAFT RAI No. 207 (eRAI No. 4191). You have until February 5, 2010 to review it and decide whether you need a conference call to discuss any questions in the RAI before the final issuance. After the phone call or after February 5, 2009, the RAI will be finalized and sent to you for response. You will then have 30 days to provide a technically complete response or an expected response date for the RAI.

Thanks.

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From: Arora, Surinder

Created By: Surinder.Arora@nrc.gov

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Tracking Status: None
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Options

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Request for Additional Information No. 207 (eRAI 4191)
DRAFT
1/22/2010

Calvert Cliffs Unit 3
UniStar
Docket No. 52-016

SRP Section: 11.05 - Process and Effluent Radiological Monitoring Instrumentation and Sampling Systems
Application Section: 11.5

QUESTIONS for Health Physics Branch (CHPB)

11.05-1

CCNPP-3 FSAR Tier 2, Rev. 6, Section 11.5.2 endorses the use of NEI ODCM Template 07-09A (Revision 0, March 2009) to meet COL Information Item 11.5-1 until a plant and site-specific ODCM is prepared, before fuel load, under the requirements of a license condition described in CCNPP-3 FSAR Section 13.4, Table 13.4-1. The staff has reviewed NEI ODCM Template 07-09A and found it acceptable (ML091050234). The development of the site specific ODCM and implementing procedures should meet the provisions of GL 89-01 (Supplement No. 1), Radiological Assessment Branch Technical Position (Revision 1, November 1979) included as Appendix A in NUREG-1301, as ODCM guidance for PWRs, and the guidance of NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978. The staff finds this approach acceptable, given the inclusion of COL Information Item 11.5-1 in U.S. EPR FSAR Tier 2, Revision 1, Sections 1.8.1 and 11.5.2, and its implementation in CCNPP-3 FSAR Tier 2, Revision 6, Section 13.4.

However, the CCNPP-3 FSAR Tier 2 does not address unique site-specific conditions that are not covered in the NEI ODCM Template 07-09A. The CCNPP-3 FSAR does not consider how the ODCM will control liquid and gaseous effluent releases and doses to members of the public given that two licensees (Constellation for CCNPP-1&2 and UniStar for CCNPP-3) will be contributing to and competing for a single dose allocation to members of the public under Parts 20.1301 and 20.1302; Part 20.1301(e) in complying with 40 CFR Part 190; and unity-rule in meeting liquid and gaseous effluent concentration limits of Part 20 (App. B, Table 2, Col. 1 and 2). Accordingly, the applicant is requested to:

1. describe in CCNPP-3 FSAR Tier 2, Section 11.5.2 the administrative program and procedures that will be used to coordinate all liquid and gaseous effluent releases and dose allocations to members of the public between Constellation for CCNPP-1&2 and UniStar for CCNPP-3 in complying with NRC regulations.
2. if UniStar has already made specific arrangements with Constellation on this matter, the applicant is requested to describe in CCNPP-3 FSAR Tier 2, Section 11.5.2 the type and duration of such arrangements, the scope of the arrangements made in coordinating the responsibility to control liquid and gaseous effluent releases and doses to members of the public,

and how the arrangements will be implemented in CCNPP-3 administrative programs and procedures in FSAR Tier 2, Section 13.1.

3. include this additional responsibility in the job functional description of the Radiation Protection/Chemistry Manager in CCNPP-3 FSAR Tier 2, Section 13.1.2.2.1.1.3.