

## CCNPP3COLA NPEmails

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**From:** Arora, Surinder  
**Sent:** Friday, January 22, 2010 11:24 AM  
**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. 206 CHPB 4190  
**Attachments:** DRAFT RAI 206 CHPB 4190.doc

Rob,

Attached is DRAFT RAI No. 206 (eRAI No. 4190). 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.

**SURINDER ARORA, PE**  
**PROJECT MANAGER,**  
**Office of New Reactors**  
**US Nuclear Regulatory Commission**

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**Hearing Identifier:** CalvertCliffs\_Unit3Cola\_NonPublic\_EX  
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**Subject:** DRAFT RAI No. 206 CHPB 4190  
**Sent Date:** 1/22/2010 11:24:20 AM  
**Received Date:** 1/22/2010 11:24:20 AM  
**From:** Arora, Surinder

**Created By:** Surinder.Arora@nrc.gov

**Recipients:**

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Tracking Status: None  
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Tracking Status: None  
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**Post Office:** HQCLSTR01.nrc.gov

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**Options**

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Request for Additional Information No. 206 (eRAI 4190)  
DRAFT  
1/22/2010

Calvert Cliffs Unit 3  
UniStar  
Docket No. 52-016  
SRP Section: 11.04 - Solid Waste Management System  
Application Section: 11.4

QUESTIONS for Health Physics Branch (CHPB)

11.04-1

CCNPP-3 FSAR Tier 2, Rev. 6, Section 11.4.3 endorses the use of NEI PCP Template 07-10A (Revision 0, March 2009) to meet COL Information Item 11.4-1 until a plant and site-specific PCP is prepared under the requirements of a license condition described in CCNPP-3 FSAR Section 13.4, Table 13.4-1. The staff has reviewed NEI PCP Template 07-10A and found it acceptable (ML091460627). The development of the site specific PCP and implementing procedures should meet the acceptance criteria of SRP Section 11.4 and Appendix 11.4-A on temporary storage. The staff finds this approach acceptable, given the inclusion of COL Information Item 11.4-1 in U.S. EPR FSAR Tier 2, Revision 1, Sections 1.8.1 and 11.4.2, and its implementation in CCNPP-3 FSAR Tier 2, Revision 6, Section 13.4.

However, a review of CCNPP-3 FSAR Tier 2, Rev. 6, Section 11.4.2 indicates the applicant has not addressed storage provisions beyond eight years in the event that access to a low-level radioactive waste disposal site is not available. U.S. EPR, FSAR Tier 2, Section 11.4.1 describes provisions within the Radioactive Waste Processing Building used to store low-level radioactive wastes for about eight years of waste generation. The applicant is requested to describe in CCNPP-3 Tier 2, Section 11.4.2 provisions for long-term storage beyond eight years using the provisions of Regulatory Guide 1.206 and 1.143 and acceptance criteria of SRP Section 11.4 and Appendix 11.4-A (NUREG-0800). The applicant should identify options and address associated regulatory compliance for a chosen long-term storage option, including:

- constructing a separate onsite storage facility that would complement the existing storage capacity of the Radioactive Waste Processing Building
- arrangements for the transfer low-level radioactive wastes to licensed third party facilities
- arrangements for the transfer low-level radioactive waste to an operating nuclear power plant managed by a parent or holding company with a license to store radioactive waste generated by CCNPP-3

The applicant should provide enough details about the chosen long-term storage option for the staff to evaluate compliance with NRC regulations, including Part 20 and Parts 50.34a and 50.59; Parts 61.55 and 61.56 as they relate to waste classification and

characteristics; NRC guidance and acceptance criteria of SRP Section 11.4 (NUREG-0800) and Regulatory Guide 1.143; and industry guidance as applicable.