

12.0 RADIATION PROTECTION

This chapter provides information on radiation protection methods and estimated occupational radiation exposures (OREs) of operating and construction personnel during normal operation and anticipated operational occurrences (AOOs). AOOs may include refueling; fuel handling and storage; radioactive material handling, processing, use, storage, and disposal; maintenance; routine operational surveillance; inservice inspection (ISI); and calibration. Specifically, this chapter provides information on facility and equipment design, planning and procedures programs, and techniques and practices employed by the applicant to meet the radiation protection standards set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Part 20, and to be consistent with the guidance given in the appropriate regulatory guides (RGs), where the practices set forth in such guides are used to implement the U.S. Nuclear Regulatory Commission (NRC) regulations.

12.1 **Assuring That Occupational Radiation Exposures Are As-Low-As-Reasonably Achievable (Related to RG 1.206, Section C.III.1, Chapter 12, C.I.12.1, “Ensuring that Occupational Radiation Exposures are As Low As Is Reasonably Achievable”)**

12.1.1 Introduction

Section 12.1 addresses policy and design considerations to ensure that the ORE to personnel will be kept As Low As Is Reasonably Achievable (ALARA). The ALARA program is addressed in this section and in Appendix 12AA of the Levy Nuclear Plant (LNP) combined license (COL) Final Safety Analysis Report (FSAR).

12.1.2 Summary of Application

Section 12.1 of the LNP COL FSAR, Revision 2, incorporates by reference Section 12.1 of the AP1000 Design Control Document (DCD), Revision 17.

In addition, in LNP COL FSAR Section 12.1, the applicant provided the following:

AP1000 COL Information Item

- STD COL 12.1-1

The applicant provided additional information in Standard (STD) COL 12.1-1 to resolve COL Information Item 12.1-1 (COL Action Item 12.2.1-1), which addresses ALARA and operational policies and compliance with RGs. The applicant provided additional information to incorporate Nuclear Energy Institute (NEI) 07-08A, “Generic FSAR Template Guidance for Ensuring That Occupational Radiation Exposures Are As Low As Is Reasonably Achievable (ALARA),” into LNP COL FSAR Section 12.1 and NEI 07-03A, “Generic FSAR Template Guidance for Radiation Protection Program Description,” in Appendix 12AA.

The applicant also added information in their FSAR that was different from NEI 07-08A, Section 12.1.2, to state that ALARA procedures are consistent with 10 CFR 20.1101 and the

quality assurance criteria described in Part III of the Quality Assurance Program Description. This change is consistent with the applicable requirements.

Supplemental Information

- STD SUP 12.1-1

The applicant provided supplemental (SUP) information by addressing equipment layout at the end of AP1000 DCD Section 12.1.2.4.

12.1.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in NUREG-1793, "Final Safety Evaluation Report Related to Certification of the AP1000 Standard Design."

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for the ALARA program are given in Section 12.1 of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants (LWR Edition)."

The applicable regulatory requirements and guidance for STD COL 12.1-1 and STD SUP 12.1-1 are as follows:

- 10 CFR Part 20, "Standards for protection against radiation"
- 10 CFR 20.1101, "Radiation protection programs"
- 10 CFR 19.12, "Instructions to workers"
- RG 1.8, "Qualification and Training of Personnel for Nuclear Power Plants," Revision 3
- RG 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2
- RG 1.97, "Criteria for Accident Monitoring Instrumentation for Nuclear Power Plants," Revision 4
- RG 8.8, "Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be ALARA," Revision 3
- RG 8.10, "Operating Philosophy for Maintaining Occupational Radiation Exposures ALARA," Revision 1-R
- NUREG-1736, "Consolidated Guidance: 10 CFR Part 20 – Standards for Protection Against Radiation"

12.1.4 Technical Evaluation

The NRC staff reviewed Section 12.1 of the LNP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to ensuring that the ORE to personnel will be kept ALARA. The results of the NRC staff's evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this safety evaluation report (SER) provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the design certification (DC) and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER for the reference COL application Vogtle Electric Generating Plant (VEGP) Units 3 and 4 were equally applicable to the LNP Units 1 and 2 COL application, the staff undertook the following reviews:

- The staff compared the VEGP COL FSAR, Revision 2 to the LNP COL FSAR. In performing this comparison, the staff considered changes made to the LNP COL FSAR (and other parts of the COL application, as applicable) resulting from requests for additional information (RAIs).
- The staff confirmed that all responses to RAIs identified in the corresponding standard content evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the LNP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. Section 1.2.3 of this SER provides an explanation of why the standard content material from the SER for the reference COL application VEGP contains evaluation material from the SER for the Bellefonte Nuclear Plant (BLN), Units 3 and 4 COL application.

The following portion of this technical evaluation section is reproduced from Section 12.1.4 of the VEGP SER:

The following portion of this technical evaluation section is reproduced from Section 12.1.4 of the BLN SER.

¹ See Section 1.2.2 for a discussion of the staff's review related to verification of the scope of information to be included in a COL application that references a DC.

AP1000 COL Information Item

- STD COL 12.1-1

The applicant provided additional information in STD COL 12.1-1, related to ALARA and Operational Policies, to resolve COL Information Item 12.1-1. COL Information Item 12.1-1 states:

Operational considerations of ALARA, as well as operational policies and continued compliance with 10 CFR 20 and RGs 1.8, 8.8, and 8.10, will be addressed by the Combined Operating License applicant. In addition, the Combined Operating License applicant will address operational considerations of the Standard Review Plan to the level of detail provided in RG 1.70. RGs that will be addressed include: 8.2, 8.7, 8.9, 8.13, 8.15, 8.20, 8.25, 8.26, 8.27, 8.28, 8.29, 8.34, 8.35, 8.36, and 8.38.

The commitment was also captured as COL Action Item 12.2.1-1 in Appendix F of the NRC staff's FSER for the AP1000 DCD (NUREG-1793), which states:

The COL applicant will review all plant procedures and modification plans that involve personnel radiation exposure to ensure that the ALARA policy is applied. In addition, a COL applicant referencing the AP1000 certified design will address operational ALARA concerns and will submit an operational ALARA policy which conforms to the requirements of 10 CFR Part 20 and the recommendations of Revision 2 to RG 1.8, RG 8.8, and Revision 1-R to RG 8.10.

In response to COL Action Item 12.2.1-1, in the BLN COL FSAR (Revision 1) as STD COL 12.1-1:

This section incorporates by reference [Nuclear Energy Institute] NEI 07-08 "Generic FSAR Template Guidance for Ensuring That Occupational Radiation Exposures Are As Low As Is Reasonably Achievable (ALARA)," Revision 2, which is currently under review by the NRC staff. See Table 1.6-201. ALARA practices are developed in a phased milestone approach as part of the procedures necessary to support the Radiation Protection Program. Table 13.4-201 describes the major milestones for ALARA procedures development and implementation.

STD COL 12.1-1 includes a commitment to the use of a "Generic FSAR Template Guidance for Ensuring That Occupational Radiation Exposures Are as Low as Is Reasonably Achievable (ALARA)," as an operational program document, based on draft NEI Template 07-08, Revision 2. The NEI template presents the functional elements of an ALARA program, which, if met, would

*demonstrate compliance with 10 CFR 20.1101 and 10 CFR 19.12. Accordingly, BLN FSAR Section 12.1, STD COL 12.1-1 needs to be updated as to its commitment to the final NEI ALARA template if it is accepted by the NRC staff. Therefore, the staff cannot find the applicant's reference to the NEI 07-08 template to be acceptable until the staff completes its review of this template as a method to meet the regulatory requirements of an ALARA program, and the BLN FSAR is updated to reference the final version of this template. This is identified as **Open Item 12.1-1**.*

The NRC staff review finds that BLN FSAR Section 12.1 and Appendix 12AA describe programs and procedures that ensure ORE will be ALARA in accordance with the training requirements in 10 CFR 19.12 and the ALARA provisions of 10 CFR 20.1101(b). The ALARA policy will be described, displayed, and implemented in accordance with the provisions of RG 8.8 (Regulatory Position C.1) and RG 8.10 (Regulatory Position C.1) and NUREG-1736, as it relates to maintaining doses ALARA.

According to BLN FSAR Appendix 12AA, NEI 07-03, NEI 07-08, and Chapter 13, "Conduct of Operations," specific individual(s) will be designated and assigned responsibility and authority for implementing ALARA policy at the BLN site. The Functional Manager in charge of Radiation Protection and the Radiation Protection staff periodically will review, update, and modify as appropriate, plant design features and changes, as well as all operating and maintenance features, using exposure data and experience gained from operating nuclear power plants to ensure that occupational exposures will be kept ALARA in accordance with RG 8.8 guidance.

Using the guidance of Section 12.1 of NUREG-0800, the staff finds BLN FSAR Section 12.1 and Appendix 12AA are in accordance with the ALARA provisions of 10 CFR 20.1101(b) and RG 8.8 (Regulatory Position C.2) and will include incorporation of measures for reducing the need for time spent in radiological areas; measures to control access to radiological areas; measures to reduce the production, distribution, and retention of activated corrosion products throughout the primary system; measures for assuring that ORE during decommissioning will be ALARA; reviews of design modifications by competent radiation protection personnel; instructions to engineers regarding ALARA design; experience from operating plants and past designs; and continuing facility design reviews.

Using the guidance of Section 12.1 of NUREG-0800, the staff finds that BLN COL FSAR Section 12.1 and Appendix 12AA describe an acceptable program to develop plans and procedures in accordance with RGs 1.33, 1.8, 8.8, and 8.10 that can incorporate the experiences obtained from facility operation into facility and equipment design and operations planning and that will implement specific exposure control techniques.

Initially, it was not clear to the NRC staff when the appropriate ALARA program and planning procedures would be implemented as described in the proposed License Conditions (Part 10 of the BLN, Units 3 and 4 COL application).

Therefore, the staff issued request for additional information (RAI) 12.1-1. In a letter dated September 22, 2008, the applicant stated that ALARA focused procedures are developed in conjunction with the Radiation Protection Program (RPP) and thus will follow the RPP milestones for implementation found in FSAR Table 13.4-201. The applicant stated that FSAR Section 12.1, STD COL 12.1-1 text will be updated as to its commitment to the final ALARA program implementation. The NRC staff finds the RAI response acceptable because it clearly identified that ALARA practices will be in place at the same time as the RPP. The NRC staff verified that Revision 1 of the BLN COL FSAR adequately incorporates the above. As a result, RAI 12.1-1 is closed. For a discussion related to the proposed license condition related to the RPP, which includes ALARA practices, refer to SER Section 12.5.5.

In accordance with 10 CFR 20.1101(b), the staff finds that overall facility operations, as well as the RPP as described in BLN COL FSAR Section 12.5, Appendix 12AA, and NEI 07-03 will integrate the procedures necessary to ensure that radiation doses are ALARA, including work scheduling, work planning, design modifications, and radiological considerations. Operating and maintenance personnel will follow specific plans and procedures to ensure that goals related to keeping exposures ALARA are achieved in the operation of the plant. Engineering controls for the protection of personnel will be optimized. Operations involving high person-sievert (person-rem) exposures will be carefully preplanned and carried out by personnel who are well trained in radiation protection and using proper equipment. During maintenance activities, in radiological areas, personnel will be monitored for exposure to radiation and contamination. Their radiation exposures will be reviewed and used to make changes in future job procedures and techniques.

*The BLN FSAR states that COL information item, STD COL 12.1-1 is addressed in NEI 07-08, and Appendix 12AA of the BLN COL FSAR, which references NEI 07-03. The staff has reviewed the current version of NEI 07-03 and NEI 07-08 with respect to compliance with RG 1.8. The NEI 07-03 template states that the Radiation Protection Manager, Radiation Protection Technicians, and Radiation Protection Supervisory and Technical Staff will be trained and qualified in accordance with the guidance of RG 1.8. In a letter dated March 18, 2009 (ML090510379), the NRC accepted NEI 07-03, Revision 7. Specifically, the NRC staff indicated that for COL applications, NEI 07-03, Revision 7 provides an acceptable template for assuring that the RPP meets the applicable NRC regulations and guidance. Since the BLN COL FSAR has not yet adopted the approved version of the NEI template, this is identified as **Confirmatory Item 12.1-1**. At present, the NRC has not accepted NEI-07-08 as an acceptable template to be used by the COL applicants. As a result, this is identified as **Open Item 12.1-1**.*

Supplemental Information

- STD SUP 12.1-1

The applicant added the following text to the end of Section 12.1.2.3, "Facility Layout General Design Considerations for ALARA," of the DCD included in the DC amendment:

A video record of the equipment layout in areas where radiation fields are expected to be high following operations may be used to assist in ALARA planning and to facilitate decommissioning.

The NRC staff acknowledges STD SUP 12.1-1 as a statement of fact not requiring NRC review.

The following portion of this technical evaluation section is reproduced from Section 12.1.4 of the VEGP SER:

Resolution of Standard Content Open Item 12.1-1 and Confirmatory Item 12.1-1

The NRC staff compared the VEGP and BLN COL applications and found them to be essentially identical, with two exceptions: first, the application material under STD COL 12.1-1 in Section 12.1 of the VEGP application references NEI 07-08A and the application material under STD COL 12.1-1 in Section 12.1 of the BLN application references NEI 07-08, Revision 2; and second, the VEGP FSAR Appendix 12AA references NEI 07-03A and the BLN FSAR Appendix 12AA references Revision 3 of NEI 07-03. Regarding these exceptions, the differing material associated with STD COL 12.1-1 in the VEGP FSAR is associated with adopting NEI 07-08A and NEI 07-03A, which are evaluated below as part of resolving Open Item 12.1-1 and Confirmatory Item 12.1-1.

In a letter from NEI to NRC dated October 29, 2009, NEI submitted NEI 07-08A to the NRC, which is the version of NEI 07-08 that has been accepted by the NRC. Accordingly, Open Item 12.1-1 is resolved for VEGP.

Confirmatory Item 12.1-1 is resolved for VEGP because the applicant has adopted the approved version of NEI 07-03, i.e., NEI 07-03A, (see paragraph below).

In Revision 2 of the VEGP COL FSAR, the applicant modified parts of FSAR Chapter 12, Appendix 12.AA that relate to STD COL 12.1-1. Specifically, in the FSAR, Revision 2, NEI 07-03A, is referenced. Accordingly, because NEI 07-03A is the approved version of NEI 07-03, the above conclusions regarding Confirmatory Item 12.1-1 are not affected by the changes to Revision 2 of the FSAR. One other change is the modification of a reference at the end of Appendix 12AA where the reference to RG 1.97 is changed from Revision 4 to Revision 3. The staff found the change acceptable, since Revision 3 provides for

a more comprehensive version of the RG and also provides for portable radiation monitoring equipment. Revision 4 of RG 1.97 indicates that partial implementation is not recommended.

12.1.5 Post Combined License Activities

The post-COL activities related to ALARA practices (part of the RPP) are discussed in Section 12.5.5 of this SER.

12.1.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to ALARA, and there is no outstanding information expected to be addressed in the LNP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes that the relevant information presented in the LNP COL FSAR is acceptable based on the relevant acceptance criteria provided in Section 12.1 of NUREG-0800. The staff based its conclusion on the following:

- STD COL 12.1-1, relating to ALARA and operational policies and compliance with relevant regulatory guidance, is acceptable because the applicant incorporates approved references NEI 07-03A and NEI 07-08A into the LNP COL FSAR and meets the applicable regulatory requirements and guidance specified in Sections 12.1.3 and 12.1.4 of this SER.
- STD SUP 12.1-1, relating to the use of video recording of equipment layout in areas where radiation fields are expected to be high, is acceptable because it is a statement of fact not requiring NRC approval.

12.2 Radiation Sources

12.2.1 Introduction

This section addresses the issues related to contained radiation sources and airborne radioactive material sources during normal operations, AOOs, and accident conditions affecting in-plant radiation protection.

12.2.2 Summary of Application

Section 12.2 of the LNP COL FSAR, Revision 2, incorporates by reference Section 12.2 of the AP1000 DCD, Revision 17.

In addition, in LNP COL FSAR Section 12.2, the applicant provided the following:

AP1000 COL Information Item

- STD COL 12.2-1

The applicant provided additional information in STD COL 12.2-1 to resolve COL Information Item 12.2-1 (COL Action Item 12.3.1-1), which addresses miscellaneous sources.

12.2.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in NUREG-1793 and its supplements.

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for the radiation sources are given in Section 12.2 of NUREG-0800.

The applicable regulatory requirements for STD COL 12.2-1 are as follows:

- 10 CFR 20.1801, "Security of stored material"
- 10 CFR 20.1802, "Control of material not in storage"
- 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 61, "Fuel storage and handling and radioactivity control"

12.2.4 Technical Evaluation

The NRC staff reviewed Section 12.2 of the LNP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to radiation sources. The results of the NRC staff's evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER for the reference COL application (VEGP Units 3 and 4) were equally applicable to the LNP Units 1 and 2 COL application, the staff undertook the following reviews:

- The staff compared the VEGP COL FSAR, Revision 2 to the LNP COL FSAR. In performing this comparison, the staff considered changes made to the LNP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs.

- The staff confirmed that all responses to RAIs identified in the corresponding standard content evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the LNP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. Section 1.2.3 of this SER provides an explanation of why the standard content material from the SER for the reference COL application VEGP contains evaluation material from the SER for the BLN Units 3 and 4 COL application.

The following portion of this technical evaluation section is reproduced from Section 12.2.4 of the VEGP SER:

The following portion of this technical evaluation section is reproduced from Section 12.2.4 of the BLN SER:

AP1000 COL Information Item

- *STD COL 12.2-1*

The applicant provided additional information in STD COL 12.2-1, related to miscellaneous sources, to resolve COL Information Item 12.2-1. COL Information Item 12.1-1 states:

The Combined License applicant will address any additional contained radiation sources not identified in subsection 12.2.1, including radiation sources used for instrument calibration or radiography.

The same commitment was also captured as COL Action Item 12.3.1-1 in Appendix F of the NRC staff's FSER for the AP1000 DCD (NUREG-1793).

The applicant provided additional information in the BLN COL FSAR to address the plant STD COL 12.2-1 dealing with miscellaneous sources. The applicant stated that licensed sources containing byproduct, source and special nuclear material that warrant shielding consideration will meet the applicable requirements of 10 CFR Parts 20, 30, 31, 32, 33, 34, 40, 50 and 70. The applicant indicated that there are byproducts and source materials with known isotopes and activity manufactured for the purpose of measuring, checking, calibrating, or controlling processes quantitatively or qualitatively. Accordingly, written procedures will be established and implemented that address procurement, receipt, inventory, labeling, leak testing, surveillance, control, transfer, disposal, storage, issuance and use of these radioactive sources. Also, the applicant indicated that sources maintained on-site for instrument calibration purposes will be shielded while in storage to keep personnel exposure ALARA.

*The regulatory requirements cited in the above paragraph address the requirements applicable to sources that would likely be used in conjunction with construction, preoperational, and initial testing. The applicant will implement the practices for radioactive material control as described in NEI 07-03, Section 12.5.4.10, "Radioactive Material Control." In a letter dated March 18, 2009 (ML090510379), the NRC accepted NEI 07-03, Revision 7. Specifically, the NRC staff indicated that for COL applications, NEI 07-03, Revision 7 provides an acceptable template for assuring that the RPP meets the applicable NRC regulations and guidance. Since the BLN FSAR has not adopted the approved version of the NEI template, this is identified as **Confirmatory Item 12.1-1**.*

The staff concludes that the information provided by the applicant with respect to radiation sources is acceptable and meets the requirements of 10 CFR Sections 20.1801 and 20.1802 and GDC 61. This conclusion is based on the applicant's commitment to the NEI 07-03 administrative controls to meet the regulatory requirements. These controls apply to the additional contained radiation sources discussed in the COL item. The staff notes that its review did not encompass the entire set of regulatory requirements cited by the applicant (10 CFR Parts 20, 30, 31, 32, 33, 34, 40, 50 and 70), since the staff's review is focused on radiation protection requirements on sources used in conjunction with the RPP.

The following portion of this technical evaluation section is reproduced from Section 12.2.4 of the VEGP SER:

Resolution of Standard Content Confirmatory Item 12.1-1

The NRC staff compared the VEGP and BLN COL applications regarding STD COL 12.2-1, and found them to be essentially identical, with the exception that VEGP FSAR Appendix 12AA references NEI 07-03A, whereas, the BLN FSAR references NEI 07-03, Revision 3. As indicated in Section 12.1.4 above, Confirmatory Item 12.1-1, is resolved for VEGP because the applicant has adopted the approved version of NEI 07-03, which is now designated as NEI 07-03A.

12.2.5 Post Combined License Activities

There are no post-COL activities related to this section.

12.2.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to radiation sources, and there is no outstanding information expected to be addressed in the LNP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the

information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

The staff concludes that the relevant information presented in the LNP COL FSAR is acceptable based on the relevant acceptance criteria provided in Section 12.2 of NUREG-0800. The staff based its conclusion on the following:

- STD COL 12.2-1, which addresses miscellaneous sources, is acceptable because the applicant has incorporated the approved reference NEI 07-03A into the LNP COL FSAR and meets the requirements of 10 CFR 20.1801, 10 CFR 20.1802, and GDC 61.

12.3 Radiation Protection Design Features

Section 12.3, "Radiation Protection Design Features" and the following Section 12.4, "Dose Assessment," are treated as separate sections in the SER (as well as in the AP1000 DCD). However, these two sections are listed as a single section, Section 12.3-12.4, "Radiation Protection Design Features," in both RG 1.206 and NUREG-0800, with the material discussed under the section "Dose Assessment" included in a section at the end of Section 12.3.

12.3.1 Introduction

This section addresses the issues related to radiation protection equipment and design features used to ensure that OREs are ALARA. It takes into account design dose rates, AOOs, and accident conditions. These issues include the facility design features, shielding, ventilation, area radiation and airborne radioactivity monitoring instrumentation, and dose assessment.

12.3.2 Summary of Application

Section 12.3 of the LNP COL FSAR, Revision 2, incorporates by reference Section 12.3 of the AP1000 DCD, Revision 17.

In addition, in LNP COL FSAR Section 12.3, the applicant provided the following:

AP1000 COL Information Items

- STD COL 12.3-1

The applicant provided additional information in STD COL 12.3-1 to resolve COL Information Item 12.3-1 (COL Action Item 12.4.2-1), which addresses the administrative controls for use of the design features provided to control access to radiological restricted areas.

- STD COL 12.3-2

The applicant provided additional information in STD COL 12.3-2 to resolve COL Information Item 12.3-2 (COL Action Item 12.4.4-1), which addresses the criteria and methods for obtaining representative measurement of radiological conditions, including airborne radioactivity concentrations in work areas.

- STD COL 12.3-3

The applicant provided additional information in STD COL 12.3-3 to resolve COL Information Item 12.3-3, which addresses the groundwater monitoring program beyond the normal radioactive effluent monitoring program.

- STD COL 12.3-4

The applicant provided additional information in STD COL 12.3-4 to resolve COL Information Item 12.3-4, which addresses the program to ensure documentation of operational events deemed to be of interest for decommissioning.

- LNP SUP 11.2-1

The applicant provided supplemental information in LNP SUP 11.2-1 describing the liquid radwaste system discharge piping exiting the Radwaste Building and the wastewater system blowdown line piping running to the plant outfall at the Crystal River Energy Complex discharge canal.

12.3.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in the NUREG-1793 and its supplements.

In addition, the acceptance criteria associated with the relevant requirements of Commission regulations for radiation protection design features are given in Section 12.3 of NUREG-0800.

The applicable regulatory requirements and guidance for STD COL 12.3-1 are as follows:

- 10 CFR Part 20
- RG 1.8, Revision 3
- RG 8.9, "Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program," Revision 1
- RG 8.38, "Control of Access to High and Very High Radiation Areas in Nuclear Power Plants," Revision 1
- NUREG-1736

The applicable regulatory requirements and guidance for STD COL 12.3-2 are as follows:

- 10 CFR Part 19, "Notices, instructions, and reports to workers: inspection and investigations"

- 10 CFR Part 20
- 10 CFR Part 50, "Domestic licensing of production and utilization facilities"
- NUREG-0737, "Clarification of TMI Action Plan Requirements," Item III.D.3.3
- RG 1.8, Revision 3
- RG 8.2, "Guide for Administrative Practices in Radiation Monitoring"
- RG 8.8, Revision 3
- RG 8.10, Revision 1-R
- RG 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, Appendix A, "Measuring Radioactive Materials in Liquid and Gaseous Effluents and Solid Waste"
- RG 1.97, Revision 4

The applicable regulatory requirements and guidance for STD COL 12.3-3 and STD COL 12.3-4 are as follows:

- 10 CFR 20.1406, "Minimization of contamination"
- 10 CFR 50.75, "Reporting and recordkeeping for decommissioning planning"
- RG 4.21, "Minimization of Contamination and Radioactive Waste Generation: Life Cycle Planning"

12.3.4 Technical Evaluation

The NRC staff reviewed Section 12.3 of the LNP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to radiation protection design features. The results of the NRC staff's evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

The staff's review of this application included the following COL information and supplementary items:

- STD COL 12.3-1, Administrative Controls for Radiological Protection
- STD COL 12.3-2, Criteria and Methods for Radiological Protection

- STD COL 12.3-3, Groundwater Monitoring Program
- LNP SUP 11.2-1, Supplemental Information on Exterior Radwaste Discharge Piping
- STD COL 12.3-4, Record of Operational Events of Interest for Decommissioning

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER for the reference COL application (VEGP Units 3 and 4) were equally applicable to the LNP Units 1 and 2 COL application, the staff undertook the following reviews:

- The staff compared the VEGP COL FSAR, Revision 2 to the LNP COL FSAR. In performing this comparison, the staff considered changes made to the LNP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the LNP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. Section 1.2.3 of this SER provides an explanation of why the standard content material from the SER for the reference COL application VEGP contains evaluation material from the SER for the BLN Units 3 and 4 COL application.

The following portion of this technical evaluation section is reproduced from Section 12.3.4 of the VEGP SER:

The following portion of this technical evaluation section is reproduced from Section 12.3.4 of the BLN SER:

AP1000 COL Information Items

- *STD COL 12.3-1*

The applicant provided additional information in STD COL 12.3-1, related to the administrative controls for radiological protection, to resolve COL Information Item 12.3-1. COL Information Item 12.3-1 states:

The Combined License applicant will address the administrative controls for use of the design features provided to control access to radiologically restricted areas, including potentially very high radiation areas, such as the fuel transfer tube during refueling operations and to the reactor cavity.

The commitment was also captured as COL Action Item 12.4.2-1 in Appendix F of the NRC staff's FSER for the AP1000 DCD (NUREG-1793), which states:

The COL applicant will address the administrative controls for use of the design features provided to control access to radiologically restricted areas, including potentially very high radiation areas, such as the reactor cavity and the fuel transfer canal during refueling operations. The hatch to the spent fuel transfer canal will be treated as an entrance to a very high radiation area under 10 CFR Part 20 and will be locked during spent fuel transfer operations.

The applicant addressed this STD COL item in BLN COL FSAR, Appendix 12AA. This appendix incorporates by reference NEI 07-03, Revision 7 [sic]. The NEI template directs COL applicants to describe the site-specific plant information for areas requiring administrative controls for very high radiation areas. To supplement NEI 07-03, Section 12.5.4.4, "Access Control," the applicant provided additional measures in Appendix 12AA for access controls such as signs, locks, plant manager (or designee) approval for entry, and radiation protection personnel accompaniment and exposure control for entry into very high radiation areas. The applicant also stated that a closed circuit television system may be installed in high radiation areas to allow remote monitoring of individuals entering high radiation areas by personnel qualified in radiation protection procedures.

The COL applicant will apply the administrative controls for the use of the design features to control access to very high radiation areas, such as the fuel transfer tube during refueling and to the reactor cavity during operations, and other radiologically restricted areas to comply with 10 CFR Sections 20.1601 and 20.1602. The opening of the fuel transfer hatch is administratively controlled, treated as an entrance to a very high radiation area, and is in place during spent fuel transfer operation.

The staff finds the applicant's approach meets the requirements of 10 CFR Sections 20.1601 and 20.1602, and is consistent with RG 8.38, Regulatory Position C1 and C3, which will ensure that an individual is unable to gain unauthorized or inadvertent access to such areas.

*In a letter dated March 18, 2009 (ML090510379), the NRC accepted NEI 07-03, Revision 7. Specifically, the NRC staff indicated that for COL applications, NEI 07-03, Revision 7 provides an acceptable template for assuring that the RPP meets the applicable NRC regulations and guidance. Since the BLN FSAR has not adopted the approved version of the NEI template, this is identified as **Confirmatory Item 12.1-1**.*

The NRC staff reviewed STD COL 12.3-1 dealing with administrative controls for radiological protection, using the text added in Appendix 12AA. The BLN COL FSAR Appendix 12AA, incorporates by reference NEI 07-03.

In Appendix 12AA, the applicant has taken exception to NEI 07-03, Section 12.5 to not conform to the guidance of the following regulatory guides:

RG 8.20, "Applications for Bioassay for I-125 and I-131"

RG 8.26 [sic], "Bioassay at Uranium Mills"

RG 8.32, "Criteria for Establishing a Tritium Bioassay Program"

The guidance documents were identified as outdated regulatory guidance in NUREG-1736, Consolidated Guidance: 10 CFR Part 20, "Standards for Protection Against Radiation," October 2001. NUREG-1736 describes that in conjunction with 10 CFR 20.1502(b), which requires licensees to monitor for likely intakes; 10 CFR 20.1204(a) and (b) prescribe how information obtained through monitoring is to be used when assessing exposures to workers from intakes. The NUREG recommends that licensees (and therefore applicants) consider the methods described in RG 8.9, "Acceptable Concepts, Models, Equations, and Assumptions for a Bioassay Program," for estimating intakes of radionuclides and determining the frequency of bioassay measurements. RG 8.9 provides updated methods and guidance that was previously contained in positions of the three RGs above. The applicant's commitment to RG 8.9 is sufficient to assure proper monitoring for intake of radionuclides.

In BLN COL FSAR, Appendix 12AA, the applicant took exception to the first paragraph of NEI 07-03, Section 12.5.2 to describe the equivalent key radiological protection positions for the BLN site. The description of organizational positions with specific radiation protection responsibilities is in BLN COL FSAR Section 13.1. BLN COL FSAR Section 13.1, "Organizational Structure of the Applicant," provides specific radiation protection responsibilities for key positions within the plant organization and the plant organization overall. Managers and supervisors within the plant operating organization are responsible for establishing goals and expectations for their organization and to reinforce behaviors that promote radiation protection. BLN COL FSAR Section 13.1.1, "Management and Technical Support Organization," and Section 13.1.2, "Operating Organization," provide the responsibilities of the organizations and positions to assure that radiological safety goals and expectations are adhered to.

The staff finds that the applicant's exception to NEI 07-03, Section 12.5.2 is acceptable because BLN COL FSAR Section 13.1 provides the key radiological safety responsibilities and organization consistent with RG 1.8.

The following portion of this technical evaluation section is reproduced from Section 12.3.4 of the VEGP SER:

Correction of Errors in the Standard Content Evaluation Text

The NRC staff identified an error in the text reproduced above from the BLN SER, Section 12.3.4, that requires correction. The BLN SER states that

Appendix 12AA of the BLN COL FSAR incorporates by reference NEI 07-03, Revision 7. The appendix actually incorporates by reference NEI 07-03, Revision 3. The NRC staff also identified an error in the text reproduced above from the BLN SER, Section 12.3.4 regarding the reference to RG 8.22, which was incorrectly referred to as RG 8.26.

Resolution of Standard Content Confirmatory Item 12.1-1

The NRC staff compared the VEGP and BLN COL applications regarding STD COL 12.3-1, and found them to be essentially identical, with the exception that VEGP FSAR Appendix 12AA references NEI 07-03A and BLN FSAR Appendix 12AA references Revision 3 of NEI 07-03. Additional clarifying information has been added to the VEGP FSAR regarding STD COL 12.3-1, which is discussed below. As indicated in Section 12.1.4 above, Confirmatory Item 12.1-1, is resolved for VEGP because the applicant has adopted the approved version of NEI 07-03, which is now designated as NEI 07-03A.

In addition, changes have been made in Revision 2 of the VEGP FSAR Chapter 12 that relate to STD COL 12.3-1. The changes are as follows:

- 1. A new Table 12AA-201 has been added to Appendix 12AA that provides information concerning access to very high radiation areas (VHRA). The table provides VHRA locations, DCD cross references, radiation sources in the locations and other conditions and restrictions.*
- 2. In FSAR Appendix 12AA, new text was added to Section 12.5.4.4 of NEI 07-03A. The text references new Table 12AA-201 and describes the information in it, discusses removal of the primary sources of radiation from the VHRA areas, and discusses verification walk downs of VHRA to ensure consistency with RG 8.38. In addition to the changes to Appendix 12AA discussed above, the applicant has also added text to Section 12.5.4 regarding the possible use of closed circuit television system to allow remote monitoring of individuals entering high radiation areas.*

These items (i.e., the addition of the table, reference to it and discussion of walk downs, and the closed circuit television system) are acceptable because they provide additional clarity and site-specific information regarding controls to VHRAs and more completely describe features that address STD COL 12.3-1.

The following portion of this technical evaluation section is reproduced from Section 12.3.4 of the BLN SER.

- STD COL 12.3-2*

The applicant provided additional information in STD COL 12.3-2, related to the criteria and methods for radiological protection, to resolve COL Information Item 12.3-2. COL Information Item 12.3-2 states:

The Combined License applicant will address the criteria and methods for obtaining representative measurement of radiological conditions, including airborne radioactivity concentrations in work areas. The Combined License applicant will also address the use of portable instruments, and the associated training and procedures, to accurately determine the airborne iodine concentration in areas within the facility where plant personnel may be present during an accident.

The same commitment was also captured as COL Action Item 12.4.4-1 in Appendix F of the NRC staff's FSER for the AP1000 DCD (NUREG-1793).

The staff reviewed STD COL 12.3-2, dealing with criteria and methods for radiological protection. In BLN COL FSAR Section 12.3.4, the applicant presented the procedure detailing the criteria and methods for obtaining representative measurement of radiological conditions, including in-plant airborne radioactivity concentrations in accordance with applicable portions of 10 CFR Part 20 and consistent with the guidance in RGs 1.21, Appendix A, 8.2, 8.8, and 8.10.

The applicant also discussed the surveillance requirements and the frequency of scheduled surveillance that are consistent with the operational philosophy in RG 8.10. In Section 12.3.4, "Area Radiation and Airborne Radioactivity Monitoring Instrumentation," the applicant described the typical survey frequencies and varieties of surveys. The surveys described in general terms include radiation, contamination, airborne radioactivity, and job coverage surveys for occupational radiation workers during normal and off-normal conditions.

Appendix 12AA also describes qualification and training criteria for site personnel consistent with the guidance in RG 1.8 and as described in FSAR Chapter 13. Section 13.2, "Training," incorporates NEI 06-13A, "Template for an Industry Training Program Description." NEI 06-13A, Section 1.2.7, provides training for the use of survey instruments, use of analytical equipment, radiation protection procedures and emergency plan procedures.

The applicant discussed a portable iodine monitoring system used to determine the airborne iodine concentration in areas where plant personnel may be present routinely and during an accident which meets the guidance of NUREG-0737, Item III.D.3.3 and complies with 10 CFR Part 50, Appendix A. The applicant will incorporate the use of this sampling system into the emergency plan implementing procedures.

The NRC staff reviewed BLN COL FSAR Section 12.3.4 and Appendix 12AA, dealing with standards applied to the calibration and maintenance of portable radiation survey instruments. The applicant describes Area and Airborne Radioactivity Monitoring Instrumentation in BLN COL FSAR Section 12.3.4 and also in Section 14.2.9.4.27, "Portable Personnel Monitors and Radiation Survey Instruments."

The portable personnel monitor and radiation survey instrument testing verifies that the devices operate in accordance with their intended function in support of the RPP as described in Chapter 12. The applicant stated as a prerequisite that the monitors, instruments and certified test sources are on site. The applicant also stated that the general test method and acceptance criteria for the monitors and instruments would be source checked and tested in accordance with the manufactures' recommendations. The NRC staff determined that additional information should be provided in addition to the use of manufacturers' recommendations. Additional standards such as American National Standards Institute (ANSI) N42.17A-1989, as it relates to the accuracy and overall performance of portable survey instruments, and ANSI N323A-1997, as it relates to the calibration and maintenance of portable radiation survey instruments should be provided. In response to RAI 12.3-12.4-5, in a letter from the applicant, dated September 22, 2008; the applicant stated that it intends to revise the BLN COL FSAR to include maintenance and calibration of survey instruments and to update the version of the ANSI standard in a future revision of the COL application. The NRC staff finds that Revision 1 of the BLN COL FSAR adequately addresses the above. As a result, RAI 12.3-12.4-5 is closed.

- *STD COL 12.3-3*

The applicant provided additional information in STD COL 12.3-3, related to the groundwater monitoring program, to resolve COL Information Item 12.3-3. COL Information Item 12.3-3 states:

The Combined License applicant will establish a groundwater monitoring program beyond the normal radioactive effluent monitoring program. If and as necessary to support this groundwater monitoring program, the Combined License applicant will install groundwater monitoring wells during the plant construction process. Areas of the site to be specifically considered in this groundwater monitoring program are as follows:

- *West of the auxiliary building in the area of the fuel transfer canal*
- *West and south of the radwaste building*
- *East of the auxiliary building rail bay and the radwaste building truck doors*

The applicant added text in BLN COL FSAR Appendix 12AA, Section 12AA.5.4.14 to the information incorporated from NEI 07-03 regarding the groundwater monitoring program.

The applicant stated that a groundwater monitoring program beyond the normal radioactive effluent monitoring program will be developed, if, and as necessary to support this groundwater monitoring program, design features will be installed during the plant construction process. The applicant discussed areas of the site to be specifically considered in this groundwater monitoring program.

The NRC staff evaluated the applicant's groundwater monitoring program to the criteria in 10 CFR 20.1406. 10 CFR 20.1406 requires the applicant to provide a description of how facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment; facilitate eventual decommissioning; and minimize, to the extent practicable, the generation of radioactive waste. The regulatory guidance which describes an acceptable method for meeting the regulation was published in June 2008, RG 4.21, Revision 0, "Minimization of Contamination and Radioactive Waste Generation: Life Cycle Planning."

The groundwater monitoring program as described in BLN COL FSAR Appendix 12AA included some implementation considerations, but the program lacked a description of the key components of the program such as, types and periodicity of routine samples, threshold activity to be detected, actions to be taken upon detection, and quality assurance practices to be used to ensure reasonable assurance of prompt identification of leakage into the groundwater (RAI 12.3-12.4-1 and RAI 12.3-12.4-2).

*The applicant stated in a letter dated September 22, 2008, that it will adopt the NEI 08-08, "Generic FSAR Template Guidance for Life Cycle Minimization of Contamination," Revision 0 template. If approved by the NRC, the applicant will provide additional description of site specific design features and procedures for operation that minimize contamination of the facility, site, and environment. NEI 08-08 is currently under staff review. This is identified as **Open Item 12.3-1**.*

*As described in Section 11.2.1 2.4 [sic] of the AP1000 DCD, Revision 17, the exterior monitored liquid effluent discharge pipe is engineered to preclude leakage by either enclosure within a guard pipe and leakage monitoring, or is accessible for visual inspection in total from the Radwaste Building to the licensed release point for dilution and discharge. No valves, vacuum breakers, or other fittings are incorporated outside of buildings. In a supplemental response dated December 16, 2008, to RAI 12.3-12.4-1, the applicant provided a proposed revision to the BLN COL FSAR to describe the site-specific design of the external radioactive waste discharge line. The staff agrees with the applicant that the site-specific design will minimize the potential for undetected leakage from this discharge to the environment at a non-licensed release point, and complies with 10 CFR 20.1406. The proposed change to the BLN COL FSAR is acceptable subject to a formal revision to the BLN COL FSAR. Accordingly, this is identified as **Confirmatory Item 12.3-1**.*

The following portion of this technical evaluation section is reproduced from Section 12.3.4 of the VEGP SER:

Resolution of Standard Content Open Item 12.3-1

Revision 2 of the FSAR references NEI 08-08A, which is the version of NEI 08-08 that has been accepted by NRC. Accordingly, Open Item 12.3-1 is resolved for VEGP.

Resolution of Standard Content Confirmatory Item 12.3-1

The NRC staff verified that Section 11.2.1.2.4 of the VEGP FSAR was updated to include the information identified in BLN Confirmatory Item 12.3-1; therefore, Confirmatory Item 12.3-1 is resolved for VEGP.

Evaluation of Site-Specific Information in Standard Content Evaluation (LNP SUP 11.2-1)

The applicant provided supplemental information in LNP SUP 11.2-1 that describes both the exterior radwaste discharge piping and the cooling tower blowdown piping. The exterior radwaste discharge piping runs from the auxiliary building to the radwaste building and then from the radwaste building to the cooling tower blowdown piping. LNP SUP 11.2-1 describes that portion of the cooling tower blowdown piping from the point where the radwaste discharge piping connects to the blowdown piping (where the radwaste is diluted with the cooling tower blowdown) to the discharge point at the Crystal River Energy Complex discharge canal.

The last paragraph of the standard content evaluation of STD COL 12.3-3, reproduced from Section 12.3.4 of the BLN SER above, provides the staff's evaluation of the exterior radwaste discharge piping for BLN. In an April 27, 2009, letter to NRC, the LNP applicant endorsed the December 16, 2008, standard content portions of the BLN supplemental response to RAI 12.3-12.4-1. In a May 4, 2011, letter to NRC, the LNP applicant provided additional plant-specific information regarding the radwaste discharge piping and cooling tower blowdown piping and proposed to modify LNP SUP 11.2-1 in FSAR Section 11.2.1.2.4 to address this additional information. In Section 11.2.4 of this SER, the staff states that LNP SUP 11.2-1 is evaluated in SER Section 12.3.

In LNP SUP 11.2-1, the applicant stated that the exterior radwaste discharge piping is enclosed within a guard pipe and is monitored for leakage. As discussed above, this design is in compliance with 10 CFR 20.1406 and the staff finds it to be acceptable. The cooling tower blowdown piping, which runs approximately 13 miles to the discharge point at the Crystal River Energy Complex discharge canal, will be a buried, 54-inch diameter single-walled pipe constructed of High Density Polyethylene. There will be two cooling tower blowdown pipes, one for each Levy unit. A manual vent valve will be installed just upstream of the elevation drop on each blowdown pipe where the blowdown pipes travel beneath the Cross Florida Barge Canal. These vent valves are included to remove air either coming out of solution or air introduced by the vacuum breakers (located on each blowdown pipe upstream of the point where the radwaste discharge pipe connects with the blowdown pipe) in the event that the air is not swept out of the blowdown line during system startup. The vent valve in each blowdown line is located where air would be most likely to collect in the line. These vent valves would be installed in manholes and therefore would not protrude from the ground. During normal operation, the vent lines are capped and the vent valves are locked closed to prevent any spillage. As required

during pump startup, personnel will be present at the vent valves to allow air to escape from the blowdown lines and then to close the valves when the vent lines fill with water. The applicant stated that any spillage from the vent valves shall be contained and properly disposed of. The applicant also stated that leak detection of the blowdown pipe will be accomplished by ground water monitoring, as part of the groundwater monitoring program, and by performing periodic walkdowns of the vent valves, in accordance with NEI 08-08A. In order to maintain these vent valves in good operating condition and thereby reduce the potential for undetected leakage from the vent valves to the environment, in accordance with the requirements of 10 CFR 20.1406, the applicant will include these vent valves in the site's routine maintenance program. RG 4.21 states that applicants should strive to minimize leaks and spills, provide containment in areas where such events might occur, and provide for detection that supports timely assessment and appropriate response. NEI 08-08A states that the COL applicant will establish an on-site ground water monitoring program to ensure timely detection of inadvertent radiological releases to the ground water. On the basis that LNP Supplement 11.2-1 states that the applicant will cap and keep the vent valves closed when not being used, will maintain these valves in good operating condition to minimize the potential for leakage, and will implement a ground water monitoring program for the cooling tower blowdown pipe, the staff finds that the information provided in LNP Supplement 11.2-1 complies with the requirements of 10 CFR 20.1406 and is therefore acceptable. Until the applicant includes the modified LNP SUP 11.2-1 in a future version of the FSAR, this will be tracked as **LNP Confirmatory Item 12.3-1**.

The following portion of this technical evaluation section is reproduced from Section 12.3.4 of the VEGP SER.

The following portion of this technical evaluation section is reproduced from Section 12.3.4 of the BLN SER.

- *STD COL 12.3-4*

The applicant provided additional information in STD COL 12.3-4, related to the record of operational events of interest for decommissioning, to resolve COL Information Item 12.3-4. COL Information Item 12.3-4 states:

The Combined License applicant will establish a program to ensure documentation of operational events deemed to be of interest for decommissioning, beyond that required by 10 CFR 50.75. This or another program will include remediation of any leaks that have the potential to contaminate groundwater.

The applicant added text in Appendix 12AA, Section 12AA.5.4.15 to the information incorporated from NEI 07-03 dealing with a record of operational events of interest for decommissioning. The applicant discussed procedures established to document the operational events that are deemed of interest for decommissioning, beyond that required by 10 CFR 50.75. These documented operational events assist in developing a historical assessment of the nuclear facilities, thereby reducing time, effort, and hazards to personnel during decommissioning planning. This documentation will include identification of the remediation of any leaks, which have the potential to contaminate groundwater.

The procedures that govern retention of these records, and the records themselves, should specify the retention period required to assure availability when they may be required (e.g., life of facility plus 30 years). The NRC staff requested in RAI 12.3-12.4-3 that the applicant include the operational and design COL information items that fully meet the objectives of RG 4.21, Revision 0 and hence the requirements of 10 CFR 20.1406, 'Minimization of Contamination.'

*In response to the RAI, in a letter dated September 22, 2008, the applicant stated that it intended to adopt NEI 08-08. This document is intended to provide the description of additional site procedures for decommissioning records which will demonstrate compliance with 10 CFR 20.1406. This is identified as **Open Item 12.3-1**.*

The following portion of this technical evaluation section is reproduced from Section 12.3.4 of the VEGP SER:

Resolution of Standard Content Open Item 12.3-1

Revision 2 of the FSAR references NEI 08-08A, which is the version of NEI 08-08 that has been accepted by NRC. Accordingly, Open Item 12.3-1 is resolved for VEGP.

12.3.5 Post Combined License Activities

The post-COL activities related to the RPP are discussed in SER Section 12.5.5.

12.3.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to radiation protection design features and there is no outstanding information expected to be addressed in the LNP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes that, pending the resolution of LNP Confirmatory Item 12.3-1, the relevant information presented in the LNP COL FSAR is acceptable based on the relevant acceptance criteria provided in Section 12.3 of NUREG-0800. The staff based its conclusion on the following:

- STD COL 12.3-1, which addresses the administrative controls for use of the design features provided to control access to radiological restricted areas is acceptable because the applicant has incorporated the approved reference NEI 07-03A into the LNP COL FSAR in order to demonstrate conformance with the applicable regulatory requirements and guidance specified in Sections 12.3.3 and 12.3.4 of this SER.

- STD COL 12.3-2, which addresses the criteria and methods for obtaining representative measurement of radiological conditions, including airborne radioactivity concentrations in work areas, is acceptable because the applicant has demonstrated compliance with the applicable regulatory requirements and guidance specified in Sections 12.3.3 and 12.3.4 of this SER.
- STD COL 12.3-3 and LNP SUP 11.2-1, which address the groundwater monitoring program beyond the normal radioactive effluent monitoring program, are acceptable pending resolution of LNP Confirmatory Item 12.3-1 because the applicant has demonstrated compliance with the applicable regulatory requirements and guidance specified in Sections 12.3.3 and 12.3.4 of this SER.
- STD COL 12.3-4, which addresses the program to ensure documentation of operational events deemed to be of interest for decommissioning is acceptable because the applicant has incorporated the approved reference NEI 08-08A into the LNP COL FSAR in order to demonstrate conformance with the applicable regulatory requirements and guidance specified in Sections 12.3.3 and 12.3.4 of this SER.

12.4 Dose Assessment

12.4.1 Introduction

This section addresses the issues related to estimating the annual personal doses associated with operation, normal maintenance, radwaste handling, refueling, ISI, and special maintenance (e.g., maintenance that goes beyond routine scheduled maintenance, modification of equipment to upgrade the plant, and repairs to failed components), and construction.

12.4.2 Summary of Application

Section 12.4 of the LNP COL FSAR, Revision **2**, incorporates by reference Section 12.4 of the AP1000 DCD, Revision **17**.

In addition, in LNP COL FSAR Section 12.4, the applicant provided the following:

Supplemental Information

- LNP SUP 12.4-1

The applicant provided supplemental information to address dose to construction workers by adding new sections after DCD Section 12.4.1.8.

- STD SUP 12.4-1

The applicant provided supplemental information regarding conduct of radiological surveys in unrestricted and controlled areas and for radioactive materials in effluents discharged to unrestricted and controlled areas.

12.4.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in the NUREG-1793 and its supplements.

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for the dose assessment are given in Section 12.4 of NUREG-0800.

The applicable regulatory requirements for LNP SUP 12.4-1 and STD SUP 12.4-1 are as follows:

- 10 CFR 20.1101
- 10 CFR 20.1301, "Dose limits for individual members of the public"
- 10 CFR 20.1302, "Compliance with dose limits for individual members of the public"

12.4.4 Technical Evaluation

The NRC staff reviewed Section 12.4 of the LNP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to dose assessment. The results of the NRC staff's evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER for the reference COL application (VEGP Units 3 and 4) were equally applicable to the LNP Units 1 and 2 COL application, the staff undertook the following reviews:

- The staff compared the VEGP COL FSAR, Revision 2 to the LNP COL FSAR. In performing this comparison, the staff considered changes made to the LNP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the LNP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting.

The staff reviewed the information in the LNP COL FSAR:

Supplemental Information

- LNP SUP 12.4-1

The applicant provided supplemental information regarding dose to construction workers in LNP COL FSAR Section 12.4.1.9 (Sections 12.4.1.9.1 through 12.4.1.9.5), "Dose to Construction Workers." Section 12.4.1.9.1 describes the site layout as depicted in Figure 2.1.1-203 of the LNP COL FSAR. The sources of radiation exposure to the construction workers are described in Section 12.4.1.9.2. However, since there is not another operating facility on the plant site, there is no source of radiation exposure until LNP Unit 1 is operating. Section 12.4.1.9.3 includes the assumptions used to calculate annual exposure estimates, and Section 12.4.1.9.4 identifies the regulatory requirements that are applicable to the construction workers. Section 12.4.1.9.5 identifies the collective annual exposure estimate for all workers and compares an individual's exposure estimate with the applicable limits.

In LNP COL FSAR Section 12.4.1.9.2, the sources of radiation that could be encountered by construction workers are identified. There is no radiation source until LNP Unit 1 is operational, so LNP Unit 1 construction workers would not receive any radiation exposure from an adjacent nuclear facility. LNP Unit 2 construction workers would potentially receive radiation exposure from direct radiation, gaseous effluents, and liquid effluents from the operation of LNP Unit 1. The applicant stated that there is no direct radiation from the containment or other buildings, as described in AP1000 DCD Section 12.4.2. Gaseous effluents have been identified as contributing to occupational exposure, but liquid effluents are not expected to contribute.

The staff agrees that there is no significant source of radiation exposure for LNP Unit 1 construction workers from an adjacent nuclear facility. The staff issued RAI 12.3-12.4-1 to obtain further information to support the applicant's conclusions that the radiation doses to LNP Unit 2 construction workers from direct radiation and liquid effluents would be negligible. In RAI 12.3-12.4-1, the staff questioned the applicant's statements that the direct radiation contribution from the containment and other plant buildings is negligible, and that no exposure to workers would occur from performing the tie-in of LNP Unit 2 liquid effluent piping. In a letter dated September 3, 2009, the applicant responded to the RAI by stating that according to the DCD, the radiation levels outside the containment building would be less than 0.25 millirem (mrem)/hour (hr). The dose at the fence around the LNP Unit 1 protected area, which is further removed, would be negligible; and, as a result, the contribution of dose to the construction workers would be negligible. The applicant also stated that no exposure to LNP Unit 2 construction workers performing the tie-in of LNP Unit 2 effluent piping would occur because these activities would be completed prior to LNP Unit 1 start of operation. The staff agrees that the potential direct radiation dose from LNP Unit 1 at the LNP Unit 2 construction site, including potential dose from the tie-in of LNP unit 2 effluent piping, would be negligible because of the separation of the two facilities (0.25 miles). The staff finds that these are reasonable bases to substantiate that construction worker doses would be negligible from these sources.

In LNP COL FSAR Section 12.4.1.9.3, the applicant identifies the methodology used for the construction worker dose estimate as a result of LNP Unit 1 gaseous effluents. Although LNP Unit 2 would be situated 402 meters (m) (1320 feet [ft.], 0.25 mile) directly north of LNP Unit 1, the applicant chose to conservatively utilize the highest χ/Q for any sector at that

distance for the dose estimates. In this case, that is a χ/Q of $1.52E-04$ seconds per cubic meter (s/m^3) in the worst meteorological sector (WSW) direction. This section also identified that doses were adjusted by a factor of 0.24 to account for annual construction worker residence time of 2080 hours of work per 8760 hours in a calendar year. The staff has reviewed the methodologies and assumptions used to estimate the worker doses. The use of the worst case (WSW) χ/Q results in a conservative assessment of the estimated worker dose (in the N sector) and is an acceptable approach.

In addition, in RAI 12.3-12.4-1, the staff also requested further information about the assumptions and bases used for selecting the exposure distances (402 m) and exposure time (2080 hours per year) to calculate the construction worker exposures, considering the potential overtime that is typically used on such construction projects. In the letter dated September 3, 2009, the applicant responded to the RAI by stating that 402 m is the distance from LNP Unit 1 to the center of the LNP Unit 2 nuclear island, which is where the majority of the construction activities would take place. The applicant also stated that construction worker exposure time of 2080 hours was selected to represent 40 hours per week for 52 weeks. Given the magnitude of the calculated dose estimates, overtime of up to 84 hours per week would still result in exposures well below applicable limits for members of the public. On the basis of the applicant's response, the staff concludes that the distance of 402 m used to calculate the χ/Q values is an accurate representation of the distance from the LNP Unit 1 where the majority of the construction workers for LNP Unit 2 will be located. The staff also agrees that even though some construction workers may work more than the estimated 2080 hours per year, the resulting increased doses to these workers would still be well below applicable limits for members of the public.

In LNP COL FSAR Section 12.4.1.9.4, "Compliance with Dose Regulations," the applicant states that the annual construction worker dose meets the requirements for members of the public as stated in 10 CFR 20.1301; 10 CFR Part 50, Appendix I; and Title 40 of the *Code of Federal Regulations* (40 CFR) Part 190, "Environmental Radiation Protection Standards for Nuclear Power Operations," during construction of LNP Units 1 and 2; and therefore, the workers would not be classified as radiation workers nor would they require monitoring. The staff agrees with this statement.

LNP COL FSAR Section 12.4.1.9.5, "Collective Doses to LNP Unit 2 Workers," identifies the total exposure that is expected to be received by all construction workers on site, given the results of the gaseous effluent exposure estimate and assumed workers and hours spent at the construction site. The collective construction worker exposure is shown to be less than 1.5 percent of the average annual collective exposure from background sources (both natural and man-made). Section 12.4.1.9.5 also refers to LNP COL FSAR Table 12.4-201, "Comparison of LNP Construction Worker Estimated Radiation Doses to 10 CFR 20.1301 Public Dose Criteria," which describes the construction worker exposure estimate results and compares them to the 10 CFR 20.1301 requirements. This table identifies that the expected construction worker exposure is 4.4 mrem/year (yr) and $2.1E-3$ mrem/hr, compared to 10 CFR 20.1301 limits of 100 mrem/yr and 2 mrem in any one hour. The staff has performed an independent analysis of the construction worker dose estimates and determined that the dose values estimated by the applicant are consistent with the staff's estimates.

In summary, the NRC staff determined that the information provided in LNP SUP 12.4-1, regarding dose to construction workers, in the new Section 12.4.1.9, is acceptable. In accordance with the discussion in the above paragraphs, RAI 12.3-12.4-1 is closed.

The following portion of this technical evaluation section is reproduced from Section 12.4.4 of the VEGP SER:

- *STD SUP 12.4-1*

The applicant provided supplemental information regarding conduct of radiological surveys in unrestricted and controlled areas and for radioactive materials in effluents discharged to unrestricted and controlled areas. The supplemental text states that these surveys are conducted by the operating unit for the purposes of implementing 10 CFR 20.1302 and to demonstrate compliance with the standards of 10 CFR 20.1301 for construction workers. This text is acceptable because it is consistent with applicable regulatory requirements.

12.4.5 Post Combined License Activities

There are no post-COL activities related to this section.

12.4.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to the dose assessment, and there is no outstanding information expected to be addressed in the LNP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes that the relevant information presented in the LNP COL FSAR is acceptable based on the relevant acceptance criteria provided in Section 12.3 of NUREG-0800. The staff based its conclusion on the following:

- LNP SUP 12.4-1, which provides supplemental information to address dose to construction workers, is acceptable because the staff concludes that the doses to workers will be in accordance with the applicable requirements of 10 CFR 20.1101; 10 CFR 20.1301; 10 CFR 20.1302; and the applicable acceptance criteria provided in NUREG-0800, Section 12.3-12.4.
- STD SUP 12.4-1, which provides supplemental information regarding conduct of radiological surveys in unrestricted and controlled areas and for radioactive materials in effluents discharged to unrestricted and controlled areas is acceptable because the applicant incorporates this information into the LNP COL FSAR in order to meet 10 CFR 20.1301 and 10 CFR 20.1302.

12.5 Health Physics Facilities Design (Related to RG 1.206, Section C.III.1, Chapter 12, C.I.12.5, "Operational Radiation Protection Program")

12.5.1 Introduction

This section addresses the objectives and design of the health physics (HP) facilities. The HP facilities are designed with the objectives of:

- Providing capability for administrative control of the activities of plant personnel to limit personnel exposure to radiation and radioactive materials ALARA and within the requirements of 10 CFR Part 20.
- Providing capability for administrative control of effluent releases from the plant to maintain the releases ALARA and within the limits of 10 CFR Part 20 and the plant Technical Specifications.

12.5.2 Summary of Application

Section 12.5 of the LNP COL FSAR, Revision **2**, incorporates by reference Section 12.5 of the AP1000 DCD, Revision **17**.

In addition, in LNP COL FSAR Section 12.5, the applicant provided the following:

AP1000 COL Information Item

- STD COL 12.5-1

The applicant provided additional information in STD COL 12.5-1 to resolve COL Information Item 12.5-1 (COL Action Item 12.6-1), which addresses the RPP description.

License Conditions

- Part 10, License Condition 3, Items C.1, D.2, G.4, and K.1

The actual milestones for the RPP are listed in Table 13.4-201.

- Part 10, License Condition 6, Operational Program Readiness

The applicant proposed a license condition to provide a schedule to support NRC inspection of operational programs including the RPP.

12.5.3 Regulatory Basis

The regulatory basis of the information incorporated by reference is addressed in NUREG-1793 and its supplements.

In addition, the acceptance criteria associated with the relevant requirements of the Commission regulations for the HP facilities design are given in Section 12.5 of NUREG-0800.

The applicable regulatory requirements and guidance for STD COL 12.5-1 and LNP COL 12.5-1 are as follows:

- 10 CFR Part 20
- RG 8.2
- RG 8.4, "Direct Reading and Indirect Reading Pocket Dosimeters"
- RG 8.6, "Standard Test Procedures for Gieger-Muller Counters"
- RG 8.8, Revision 3
- RG 8.9, Revision 1
- RG 8.10, Revision 1-R
- RG 8.28, "Audible Alarm Dosimeters"
- NUREG-1736

The applicable regulatory requirement for License Condition 3, Items C.1, D.2, G.4, and K.1 is as follows:

- 10 CFR 20.1101

12.5.4 Technical Evaluation

The NRC staff reviewed Section 12.5 of the LNP COL FSAR and checked the referenced DCD to ensure that the combination of the DCD and the COL application represents the complete scope of information relating to this review topic.¹ The NRC staff's review confirmed that the information in the application and incorporated by reference addresses the required information relating to the HP facilities design. The results of the NRC staff's evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

Section 1.2.3 of this SER provides a discussion of the strategy used by the NRC to perform one technical review for each standard issue outside the scope of the DC and use this review in evaluating subsequent COL applications. To ensure that the staff's findings on standard content that were documented in the SER for the reference COL application (VEGP Units 3 and 4) were equally applicable to the LNP Units 1 and 2 COL application, the staff undertook the following reviews:

- The staff compared the VEGP COL FSAR, Revision 2 to the LNP COL FSAR. In performing this comparison, the staff considered changes made to the LNP COL FSAR (and other parts of the COL application, as applicable) resulting from RAIs.
- The staff confirmed that all responses to RAIs identified in the corresponding standard content evaluation were endorsed.
- The staff verified that the site-specific differences were not relevant.

The staff has completed its review and found the evaluation performed for the standard content to be directly applicable to the LNP COL application. This standard content material is identified in this SER by use of italicized, double-indented formatting. Section 1.2.3 of this SER provides an explanation of why the standard content material from the SER for the reference COL application VEGP contains evaluation material from the SER for the BLN Units 3 and 4 COL application.

The following portion of this technical evaluation section is reproduced from Section 12.5.4 of the VEGP SER:

The following portion of this technical evaluation section is reproduced from Section 12.5.4 of the BLN SER:

AP1000 COL Information Item

- *STD COL 12.5-1*

The applicant provided additional information in STD COL 12.5-1, addressing the RPP description, to resolve COL Information Item 12.5-1. COL Information Item 12.5-1 states:

The Combined License applicant will address the organization and procedures used for adequate radiological protection and to provide methods so that personnel radiation exposures will be maintained ALARA.

The same commitment was also captured as COL Action Item 12.6-1 in Appendix F of the NRC staff's FSER for the AP1000 DCD (NUREG-1793). The applicant stated that STD COL 12.5-1 is addressed in Appendix 12AA of the BLN COL FSAR. This appendix incorporates by reference NEI 07-03, Revision 3. The applicant described revisions to NEI 07-03 and supplemental information in Appendix 12AA of the BLN COL FSAR. The staff evaluated the revised text and supplemental information provided in conjunction with the referenced NEI 07-03, Revision 3 template. These revisions and supplements address STD COL Items 12.1-1, 12.3-1, 12.3-3, 12.3-4, and 12.5-1. The applicant's proposed revisions and supplements are:

- 1. Specific organizational positions were described in Chapter 13 of BLN COL FSAR; and Sections 12.5.2.1 through 12.5.2.5 are not incorporated in Appendix 12AA.*
- 2. Facilities, as described in general terms in NEI 07-03, Revision 3 are not incorporated in BLN COL FSAR Appendix 12AA; facilities, instrumentation, and equipment are described in DCD Section 12.5.2.*
- 3. Supplemental information was provided for NEI 07-03, Section 12.5.3.3 to describe compliance with 10 CFR 20.1703(b) and 10 CFR 20.1705 when*

National Institute for Occupational Safety and Health (U.S. Public Health Service) tested and certified respiratory protection equipment is not used.

4. *The following headings and associated material that are described in general terms in NEI 07-03, Revision 3 are not incorporated in Appendix 12AA. Radwaste Handling, Spent Fuel Handling, Normal Operation, and Sampling are described in DCD Section 12.5.3.*
5. *Supplemental information was provided for NEI 07-03, Section 12.5.4.4 [sic] to describe the use of a closed circuit television system to allow remote monitoring for high radiation areas access.*
6. *Supplemental information was provided for NEI 07-03, Section 12.5.4.4 to describe access control measures for very high radiation areas. Locations and radiological controls of the radiation zones are described on plant diagrams in DCD Section 12.5.3.*
7. *Appendix 12AA revised NEI 07-03, Section 12.5.4.7 to clarify the location of the COL applicant's management policy, organizational responsibility authorities for implementing an effective ALARA program, and the establishment and implementation of radiation protection.*
8. *The applicant revised the second bullet of NEI 07-03, Section 12.5.4.7 II to require that the functional manager in charge of radiation protection be responsible for defining the value for "Significant exposures" and the associated activities within written procedures. The example value described in NEI 07-03 includes activities that are estimated to involve greater than 1 person-rem of collective dose.*
9. *The COL applicant added text after the last bullet of NEI 07-03, Section 12.5.4.8 to adopt NEI 08-08 that is currently under review by the NRC staff.*
10. *The COL applicant added information to NEI 07-03, Section 12AA.5.4.14 and Section 12AA.5.4.15 [sic] to adopt NEI 08-08 that is currently under review by the NRC staff.*

The applicant describes the exceptions and supplemental information to NEI 07-03 that reference additional design and site-specific information necessary to clearly identify the source of the information addressed in the RPP as described in Appendix 12AA. The applicant's description provides sufficient detailed information supporting the exceptions or revisions such that the information described provides clear direction as to organizational structure, facilities, management policy for ALARA, and where the threshold for significant with exposures will be described. The NRC staff agrees that the applicant's exceptions to NEI 07-03, noted above are acceptable because these exceptions and the supplemental information satisfy the regulatory requirements of 10 CFR 20.1106 (b), the acceptance criteria of Sections 12.1 and 12.5 of

NUREG-0800 and the regulatory guidance in RG 8.8, Position C.1.b, RG 8.9, and RG 8.10, Positions C.1.a, and C.2.

The applicant added Appendix 12AA, "Appendix 12AA, Radiation Protection Program Description," after Section 12.5 of the DCD. In this appendix the applicant incorporates by reference NEI 07-03, Revision 3. The applicant indicated that Table 13.4-201 provides milestones for radiation protection operational program implementation.

The NRC staff reviewed STD COL 12.5-1 dealing with the RPP description in BLN COL FSAR Appendix 12AA. The additional controls described in STD COL 12.5-1 are consistent with the discussion in NUREG-1736 regarding Bioassay programs for personnel monitoring and are consistent with the applicant's commitment to RG 8.9. The staff reviewed the threshold for determining significant exposures. The applicant stated that the functional manager in charge of radiation protection determines the threshold within procedures. Initially, the staff did not consider that the applicant exercised sufficient control related to maintaining ALARA (RAI 12.5-1).

*In response to RAI 12.5-1, in a letter dated September 22, 2008, the applicant provided additional information that the final NEI 07-03 template (Revision 7) would be incorporated without departure concerning significant exposures. In a letter dated March 18, 2009 (ML090510379), the NRC accepted NEI 07-03, Revision 7. Specifically, the NRC staff indicated that for COL applications, NEI 07-03, Revision 7 provides an acceptable template for assuring that the RPP meets the applicable regulations and guidance. Since the BLN COL FSAR has not yet adopted the approved version of the NEI template, this is identified as **Confirmatory Item 12.1-1**.*

The NRC staff reviewed Revision 0 of the BLN COL FSAR Appendix 1AA, which listed the applicant's conformance with radiation protection related RGs. The applicant stated that it will conform in general to RG 8.28, "Audible Alarm Dosimeters," Revision 0, dated August 1981, and specifically stated that it conforms to ANSI N13.7-1981, which was reaffirmed in 1992. ANSI N13.7-1983 is the "American National Standard for Radiation Protection-Photographic Film Dosimeters Criteria for Performance." RG 8.28, Revision 0, endorsed ANSI N13.27-1981, "Performance Specifications for Pocket-Sized Alarming Dosimeters/Ratemeters." This discrepancy was identified in RAI 1-10. In response to RAI 1-10, the applicant stated that BLN COL FSAR Appendix 1AA would be revised to the correct reference of the ANSI standard in a future revision of the BLN COL FSAR. The NRC staff verified that Revision 1 of the BLN COL FSAR adequately addresses the proposed change. As a result, RAI 1-10 is closed.

The following portion of this technical evaluation section is reproduced from Section 12.5.4 of the VEGP SER:

The staff notes that the VEGP FSAR has not been updated to correct the discrepancy identified in RAI 1-10 regarding the reference to ANSI N13.27-1981. Revision 2 of the VEGP FSAR currently references the incorrect standard, ANSI N13.7-1981, under RG 8.28 in Appendix 1AA. Since the VEGP applicant has endorsed RAI 1-10, the staff expects this discrepancy to be corrected in a future revision of the VEGP FSAR. This is **VEGP Confirmatory Item 12.5-2**.

Correction of Error in the Standard Content Evaluation Text

The NRC staff identified two errors in the text reproduced above from the BLN SER, Section 12.5.4 that require correction. In the change numbered 5 above, the reference to "NEI 07-03, Section 12.5.4.4," is incorrect. The correct reference is to "NEI 07-03, Section 12.5.4.2." In the change numbered 10, above, the reference to "Section 12AA.5.4.14 and Section 12AA.5.4.15" is incorrect. The correct reference is to "Section 12.5.4.14 and Section 12.5.4.15."

Resolution of Standard Content Confirmatory Item 12.1-1

The NRC staff compared the VEGP and BLN COL applications regarding STD COL 12.5-1, and found them to be essentially identical, with the exception that VEGP FSAR Appendix 12AA references NEI 07-03A and BLN FSAR Appendix 12AA references Revision 3 of NEI 07-03. Additional clarifying information has been added to the VEGP FSAR regarding STD COL 12.5-1, which is discussed below. As indicated in Section 12.1.4 above, Confirmatory Item 12.1-1, is resolved for VEGP because the applicant has adopted the approved version of NEI 07-03, which is now designated as NEI 07-03A.

In Revision 2 of the FSAR, the applicant modified parts of FSAR Chapter 12, Appendix 12AA, that relate to STD COL 12.5-1. The changes are as follows:

1. Text describing a closed circuit television system associated with high radiation areas has been moved from Appendix 12AA to Section 12.5.2.2 (this text is associated with STD COL 12.3-1, and is evaluated in Section 12.3.4 of this SER).
2. References in NEI 07-03A have been revised to reflect the appropriate sections of the FSAR.
3. Proposed modifications to the second bullet of NEI 07-03, Section 12.5.4.7 have been withdrawn.
4. Bullet number 3 of NEI 07-03A, Section 12.5, has been revised to address aspects of the radiation program functional areas that must be in place at various milestones.
5. A cross reference to NEI 08-08A has been added in NEI 07-03A.

6. *The first paragraph of Section 12.5.4.12 of NEI 07-03A has been revised to address 10 CFR 20.1101 and the Quality Assurance Program.*

Items 1, 2, and 5 are acceptable because they are editorial and do not affect content. The change described in Item 3 is acceptable because NEI 07-03A is acceptable without modification. The changes described in Item 4 are acceptable because they are consistent with the milestones described in FSAR Table 13.4-201 and with applicable regulatory requirements. The changes described in Item 6 are acceptable because they are consistent with 10 CFR 20.1101 and the Quality Assurance Program described in FSAR Section 17.5.

Exceptions to RGs 8.2, 8.4, 8.6, and Section C.3.b of RG 8.8

The following portion of this technical evaluation section is reproduced from Section 12.5.4 of the BLN SER.

The applicant took exception to RG 8.2, "Guide for Administrative Practices in Radiation Monitoring," regarding a reference to a previous version of 10 CFR Part 20 (10 CFR 20.401), because it is no longer valid. The staff agrees with the applicant's exception.

The applicant took exception to RG 8.4, "Direct Reading and Indirect Reading Pocket Dosimeters," regarding references to previous versions of 10 CFR Part 20 (10 CFR 20.202(a), and 10 CFR 20.401) because they are no longer valid. The staff agrees with the applicant's exception. The applicant also took exception to ANSI N13.5-1972 (R-1989), in that two performance criteria, accuracy and leakage, specified in the guidance, are to be met by acceptance standards in ANSI N322-1997, "ANSI Test, Construction, and Performance requirements for Direct Reading Electrostatic/Electroscope Type Dosimeters." The staff finds that by using ANSI N322-1997 for performance criteria, 10 CFR 20 requirements are still met, as the major change is the allowance of an additional one percent leakage over a comparable time period. Test and calibration intervals recommended by RG 8.4 are not affected.

The applicant took exception to RG 8.6, "Standard Test Procedures for Geiger Mueller Counters," to reference an instrument calibration program based upon ANSI Criteria N323A-1997 (with 2004 Correction Sheet), "Radiation Protection Instrumentation Test and Calibration, Portable Survey Instruments." This methodology is acceptable over the previous program referenced in RG 8.6 because the ANSI standard reflects current industry practices. The staff agrees with the applicant's position.

The applicant took exception to part of Position C.3.b in RG 8.8, "Information Relevant to Ensuring that Occupational Radiation Exposure at Nuclear Power Stations will be ALARA." This exception was to the reporting requirements associated with operating exposure. The applicant's basis for justifying the exception to RG 8.8, Position C.3.b, is that reporting of operating exposure

information is no longer required. The staff agrees with the applicant's exception to RG 8.8, Position C3.b, because this specific reporting requirement has been superseded. All licensees are now required to report records of ionizing exposure to the NRC annually in accordance with 10 CFR 20.2206.

License Condition

- *License Condition 3, Items C.1, D.2, G.4, and K.1*

Implementation milestones were provided by the applicant to address the RPP required by 10 CFR 20.1101. A phased-in implementation should include appropriate milestones in the construction of the facility. Staffing levels, equipment, facilities, and procedures necessary to ensure radiation safety of the workers and public for each phase of implementation should be identified. In RAI 12.5-2, the staff requested that the applicant provide the specific programs to be implemented at each milestone identified in Table 13.4-201 of the BLN COL FSAR. In its response to the RAI, the applicant provided clarifying information regarding Table 13.4-201.

*In a supplemental response to RAI 12.5-2, dated December 16, 2008, the applicant provided a proposed revision to BLN COL FSAR Table 13.4-201 to show the specific program(s) for each milestone and assignment of a Radiation Protection Manager and Supervisor. The proposed change to BLN COL FSAR Table 13.4-201 is acceptable subject to a formal revision to the BLN COL FSAR, based on the specific commitment to establish an individual responsible for each milestone. Accordingly, this is identified as **Confirmatory Item 12.5-1**.*

The following portion of this technical evaluation section is reproduced from Section 12.5.4 of the VEGP SER:

Resolution of Standard Content Confirmatory Item 12.5-1

The NRC staff verified that the VEGP FSAR was updated to include the information identified in the initial and supplemental BLN response to RAI 12.5-2. Accordingly, Standard Content Confirmatory Item 12.5-1 is resolved for the VEGP COL FSAR.

- Part 10, License Condition 6, Operational Program Readiness

The applicant proposed a license condition to provide a schedule to support NRC inspection of operational programs including the RPP. The proposed license condition is consistent with the policy established in SECY-05-0197 and is acceptable.

12.5.5 Post Combined License Activities

For the reasons discussed in the technical evaluation section above, the staff finds the following license conditions proposed by the applicant acceptable:

- License Condition (12-1) - The licensee shall implement the RPP including the ALARA principle (or applicable portions thereof) on or before the associated milestones identified below:
 - Receipt of Materials – Prior to initial receipt of byproduct, source, or special nuclear materials onsite (excluding exempt quantities as described in 10 CFR 30.18)
 - Fuel Receipt – Prior to initial receipt of fuel onsite
 - Fuel Loading – Prior to initial fuel load
 - Waste Shipment – Prior to initial radioactive waste shipment
- License Condition (12-2) – No later than 12 months after issuance of the COL, the licensee shall submit to the Director of the NRO a schedule that supports planning for and conduct of NRC inspections of the operational program (RPP). The schedule shall be updated every 6 months until 12 months before scheduled fuel loading, and every month thereafter until this operational program has been fully implemented.

12.5.6 Conclusion

The NRC staff reviewed the application and checked the referenced DCD. The NRC staff's review confirmed that the applicant addressed the required information relating to the HP facilities design, and there is no outstanding information expected to be addressed in the LNP COL FSAR related to this section. The results of the NRC staff's technical evaluation of the information incorporated by reference in the LNP COL application are documented in NUREG-1793 and its supplements.

In addition, the staff concludes that the relevant information presented in the LNP COL FSAR is acceptable based on the relevant acceptance criteria provided in Section 12.5 of NUREG-0800. The staff based its conclusion on the following:

- STD COL 12.5-1, which addresses the RPP description is acceptable because the applicant incorporates NEI 07-03A into the LNP COL FSAR in order to meet the applicable regulatory requirements and guidance specified in Sections 12.5.3 and 12.5.4 of this SER.