

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Tuesday, April 27, 2010 3:04 PM
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Cc: ComanchePeakCOL Resource; Takacs, Michael
Subject: Comanche Peak RCOL Chapter 13 Section 13.3 - RAI Number 159
Attachments: RAI 4579 (RAI 159).docx

The NRC staff has identified that additional information is needed to continue its review of the combined license application. The NRC staff's request for additional information (RAI) is contained in the attachment. Luminant is requested to inform the NRC staff if a conference call is needed.

The response to this RAI is due within 35 calendar days of April 27, 2010.

Note: If changes are needed to the safety analysis report, the NRC staff requests that the RAI response include the proposed changes.

thanks,

Stephen Monarque
U. S. Nuclear Regulatory Commission
NRO/DNRL/NMIP
301-415-1544

Hearing Identifier: ComanchePeak_COL_Public
Email Number: 894

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RAI 4579 (RAI 159).docx		24475

Options

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Request for Additional Information (RAI) No. 4579 COLA Revision 1

RAI Number 159

4/27/2010

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 13.03 - Emergency Planning
Application Section: Part 5: Emergency Planning

QUESTIONS for USAPWR Projects Branch (NMIP)

13.03-38

Open Item 13.03-08: On-site Emergency Response Organization (ERO)
[Basis: 10 CFR 50, Appendix E.IV.A: 1, 2, 4, 5; NUREG-0654/FEMA-REP-1, Evaluation Criterion B1 through 9]
Acceptance Criteria: (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1 and 2.

In **RAI 13.03-3.B-2**, the NRC staff requested information regarding other employees and non-employees in supporting organizations and their special qualifications by position and function to be performed that may be called upon for assistance for emergencies. In response, the applicant stated that individuals who are not members of the ERO, but who may be called on for assistance are many and varied, and are considered outside the Emergency Plan. However, 10 CFR 50, Appendix E.IV.A.5 states, that the applicant shall identify employees with special qualifications for coping with emergency conditions by position and function to be performed during an emergency. Staff requests that the Emergency Plan identify, by position and function to be performed, other employees of the licensee with special qualifications for coping with emergency conditions that may arise as required under 10 CFR 50, Appendix E.IV.A.5.

13.03-39

Open Item 13.03-09: Recovery and Reentry Planning and Post-Accident Operations
[Basis: 10 CFR 50.47(b)(13), Planning Standard M; 10 CFR 50, Appendix E.IV.H; NUREG-0654/FEMA-REP-1, Evaluation Criterion M.1 through M.4]
ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A; Acceptance Criteria 1

In **RAI 13.03-11.M-1**, the NRC staff requested the applicant identify the position/title and authorities of key positions of the Operations Support staff and Technical Support staff that have the responsibility for analyzing and developing plans and procedures to support restoration of the site to operational status. In its response, the applicant provided information for the Recovery Manager; however, the position titles and authorities are needed for the Technical Support and Operations Support positions. Staff requests information regarding the position title and authorities of key positions of the Operations Support and Technical Support staff be identified in the Emergency Plan.

13.03-40

Open Item 13.03-10: Radiological Emergency Training

[Basis: 10 CFR 50.47(b)(15), Planning Standard O; 10 CFR 50, Appendix E.IV.F.1, Appendix E.IV.F.2.g; NUREG-0654/FEMA-REP-1, Evaluation Criterion O.1 through O.5] ACCEPTANCE CRITERIA (NUREG-0800, section 13.3): Requirements A and B; Acceptance Criteria 1 and 2

In RAI 13.03-13.O-1, the NRC staff requested the applicant discuss whether the training provided to the first-aid team is equivalent to the Red Cross “first responder” training. In its response, the applicant stated that the NRC will assure that training for the First Aid Team is appropriate. Staff requests that the applicant discuss whether the training provided to the first aid team is equivalent to the Red Cross “first responder” training, as provided in NUREG 0654/FEMA-REP-1; Evaluation Criterion O.3. Include this information in the Emergency Plan.

13.03-41

Open Item 13.03-11: Subject: Hostile Action Considerations

[Basis: 10 CFR 50.47; Appendix E to 10 CFR 50; Regulatory Guide 1.206, Section C.I.13.3.1]

NUREG-0800, Chapter 13.3, SRP Acceptance Criteria: 1, 2, and 30

Regulatory Guide 1.206 requests that applicants for a combined license address the NRC orders issued February 25, 2002, as well as any subsequent NRC guidance, to determine what security-related aspects of emergency planning and preparedness are addressed in the emergency plan. NRC Bulletin 2005-02, “Emergency Preparedness and Response Actions for Security-Based Events,” provides guidance for identifying alternative facilities to support emergency response organization augmentation during hostile-action events. Describe in the emergency plan, or provide reference to where this information is contained, an alternative facility to support rapid response to a hostile-action event, or provide justification as to why this information is not necessary. As stated in BL 2005-02, the alternative facility should include the following characteristics:

- Accessibility even if the site is under threat or attack;
- Communication links with the emergency operations facility, control room, and security;
- Capability to notify offsite response organizations if the emergency operations facility is not performing this action;
- Capability for engineering and damage control teams to begin planning mitigative actions (e.g., general drawings and system information)

13.03-42

Open Item 13.03-12: Subject: Hostile Action Considerations

[Basis: 10 CFR 50.47; Appendix E to 10 CFR 50; Regulatory Guide 1.206, Section C.I.13.3.1]

NUREG-0800, Chapter 13.3, SRP Acceptance Criteria: 1, 2, and 30

Regulatory Guide 1.206 requests that applicants for a combined license address the NRC orders issued February 25, 2002, as well as any subsequent NRC guidance, to determine what security-related aspects of emergency planning and preparedness are addressed in the emergency plan. NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," provides guidance for onsite protective measures for site workers during hostile-action events. Describe in the emergency plan, or provide reference to where this information is contained, specific provisions to protect onsite emergency responders and personnel, in emergencies resulting from hostile-action events, or provide justification as to why this information is not necessary. As stated in BL 2005-02, these provisions may include:

- o Evacuation of personnel from target buildings (including security personnel);
- o Site evacuation by opening security gates (while continuing to defend);
- o Dispersal of licensed operators;
- o Sheltering of personnel in structures away from potential site targets;
- o Arrangements for accounting for personnel after the attack