**NRC Comments on NASA PBRF Final Status Survey Report**

**FSSR: ____ Attachments 1-5_____**

| *Cmt #* | *Section # Page #* | *Comment* | *Comment Class** | *Commentor's Proposed Resolution* |
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| **Generic Comments** | | | | |
| 1. | Attachment 3, Fan House, Section 2.4, Page 5, 1st and 2nd paragraph | First paragraph notes that all piping was drained and removed except for the cold sump in the basement which was maintained to control water leakage, and second paragraph states the FSS does not include piping embedded in Fan House concrete or piping buried beneath or adjacent to the building. These results are reported in a separate attachment to the FSSR (Attachment 9).<br><br>Provide basis for not including FSS for embedded piping in Fan House FSSR. Based on NASA's FSSP (Section 3.3), "Embedded piping (EP) is any pipe below the minus (-3) foot elevation that is totally encased in concrete or piping directly beneath building floors that may not be totally encased in concrete, but contained within the structural foundation of the building." | 2 | Address this comment generically as it applies to other FSSRs. |
| 2. | Attachment 2, SEB, Section 4.3, Table 7, Page 17; and Section 5.5, Page 27 | Footnote 3 to Table 7 states "The Design No.21 DCGLw, 10,560 dpm/100-cm2, was obtained by adjusting CPT DCGL, 11,000 dpm/100-cm2, by a factor of 24/25 to account for embedded piping." Survey Design No. 21 contains Survey Unit SE-3-34 which includes Rm 20/21 Sump #4 (per Table 4). This implies that Survey Design No. 21 is the only survey unit containing embedded piping in the SEB. Please confirm that Survey Design No. 21 is the only SEB survey unit containing embedded | 2 | Address this comment generically as similar DCGL adjustments are noted in some building survey design tables (e.g., SEB, FH, HRA), but not in others (ROLB). |

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| | | piping. Otherwise, assess and revise to account for all survey units in SEB.<br><br>Section 5.5 concludes that the SEB meets the release criteria. This conclusion requires that the dose from each survey unit be assessed in demonstrating that the release criteria are met. As you know, the survey unit is the fundamental unit of compliance. | | |
| 3. | Attachment 2, SEB, Section 4.3, Table 7, Page 17 | Footnote 4 states "In Survey Design No. 34, survey units SE-4-1 and SE-4-2 (building exterior surfaces), the DCGLw, 24,449 dpm/100-cm2, was obtained by adjusting the default value, 27, 166 dpm/100-cm2, by a factor of 22.5/25 to account for deselected insignificant radionuclides."<br><br>Is this approach for adjusting the default DCGL value consistent with approach used for other buildings? | 3 | Please address this comment generically as similar adjustments are noted in some building survey design tables (e.g., ROLB, FH, and HRA). |
| 4. | Attachments 3, Fan House, Section 4.1, Page 10 | Table 2 list investigation levels for Class 1, 2 and 3 survey units. However, the actual level that triggers an investigation appears to be less than the level indicated in Table 2. For example, Table 2 of FSSRs state that the scan investigation level for a Class 1 survey unit is >DCGLemc, however the ROLB and SER FSSRs indicate that scan investigations were triggered with activity levels above background.<br><br>Identify the actual scan investigation level used in the field if different than the level indicated in Table 2. | 3 | Please address this comment generically if applicable to other FSSRs. |
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| **Specific Comments** | | | | |
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| | Attachment 2, SEB, Section 5.1, Page 23 | First bullet refers to values listed in Survey Design 10, Table 6. The referenced values appear to be in Table 7 rather than Table 6. | 3 | Confirm accuracy of referenced table and revise if appropriate. |
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| | Attachment 3, Fan House, Section 4.1, Table 1, Page 10 | In determining the DCGLw (36,857 dpm/100 cm2) for the Fan House Building, the licensee evaluated the isotopic mixture of the Fan House Building and determined the following mixture: 1) H-3 (77.7%), 2) U-234 (16.7%), and Cs-137 (5.6%). NRC staff observed that the sum of the fraction for the Exterior Concrete Wall in Table 1 is greater than 1. It appears to be a typographical error for Co-60 (Observed 0.966 vs Reported 0.0965) | 2 | Correct Table 1 so isotopic mixture of radionuclides in exterior concrete walls sum to 1. |
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*Urgency Classification:

1 – Major – substantive comment (RAI) formally transmitted in concurrence package for licensee response.

2 – Minor - comment or question that warrants response by licensee.

3 – Other - comment that may be addressed during periodic call with licensee.