

PMVictoriaESPPEm Resource

From: Jessie, Janelle
Sent: Friday, February 11, 2011 4:20 PM
To: david.distel@exeloncorp.com
Cc: christopher.kerr@exeloncorp.com; Hale, Jerry; VictoriaESP Resource
Subject: Response Requested: Draft RAIs for Victoria County Station ESP Application
Attachments: Draft RAIs 3.5.1.6, 11.2, 11.3 and 17.5.pdf

Good Afternoon David,

Attached are draft RAIs in support of the safety review for the Victoria County Station ESP application. Please take a moment to review the questions to ensure that you understand what the staff is asking.

There are five RAIs. RAI 5396 has 1 question, RAI 5289 has 1 question, RAI 5291 has 1 question, RAI 5290 has 1 question and RAI 5407 has 3 questions for a total of 7 questions.

Be sure to let me know if a clarification call is needed *by no later than Friday, February 18, 2011.*

As a reminder, the purpose of a clarification call is to clarify what the staff is asking; it is not a forum to debate a technical issue in the question or share your intended response with the staff as either of those types of calls require a public teleconference. So, please keep this mind.

If a clarification call is not needed, please let me know this information as well.

Thanks

Janelle

Hearing Identifier: Victoria_ESP_Public
Email Number: 182

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Subject: Response Requested: Draft RAIs for Victoria County Station ESP Application
Sent Date: 2/11/2011 4:19:30 PM
Received Date: 2/11/2011 4:19:30 PM
From: Jessie, Janelle

Created By: Janelle.Jessie@nrc.gov

Recipients:

"christopher.kerr@exeloncorp.com" <christopher.kerr@exeloncorp.com>
Tracking Status: None
"Hale, Jerry" <Jerry.Hale@nrc.gov>
Tracking Status: None
"VictoriaESP Resource" <VictoriaESP.Resource@nrc.gov>
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Tracking Status: None

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Draft RAIs 3.5.1.6, 11.2, 11.3 and 17.5.pdf		70436

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
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VICTORIA COUNTY STATION EARLY SITE PERMIT COURTESY RAIs

Title	Victoria County Station ESP - 17.5 - Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants - Question 19904
RAI ID	5407
Acceptance Criteria	NUREG 0800 Section 17.5 part II, Subsection A and NEI 06-17A, Rev 7
Description	<p>SRP Section 17.5 part II, subsection A, "Organization," states that the applicant's QAPD should 1) contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces, 2) include the onsite and offsite organizational elements that function under the cognizance of the QA program, 3) define the interface responsibilities for multiple organizations.</p> <p>The applicant commits to Nuclear Energy Institute (NEI) QAPD template (NEI 06-14A, Revision 7, "Quality Assurance Program Description") as conditionally endorsed by an NRC SER dated November 3, 2009 (ML102370305). The template provides organizational charts that include all on-site and off-site organizations and applicable phases of the QAPD.</p> <p>Please describe the title, role, and interfaces for each of the on-site and off-site organizations for each phase described in the organization section of the QAPD, and annotate their position in the appropriate organizational chart, or provide justification for any exceptions to the guidance provided in SRP Section 17.5 part II, subsection A, and NEI 06-14A, Revision 7.</p>

Title	Victoria County Station ESP - 17.5 - Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants - Question 19917
RAI ID	5407
Acceptance Criteria	NUREG 0800 Section 17.5 part II, Subsection A
Description	<p>SRP Section 17.5 part II, subsection A, "Organization," states that the applicant or holder may delegate part or all of the activities of planning, establishing, and implementing the overall QA program to others but is to retain the responsibility for the program.</p> <p>The "Organization" section of Section 17.5 of the applicant's COL FSAR does not provide for the delegation of part or all of the activities of planning, establishing, and implementing the overall QA program to others nor state that the applicant retains responsibility for the QA program.</p> <p>Please clarify how the Victoria County Station's QAPD section "Organization" meets the acceptance criteria in SRP Section 17.5 part II, subsection A, "Organization," or please explain the basis for any exceptions.</p>

Title	Victoria County Station ESP - 17.5 - Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants - Question 19920
RAI ID	5407
Acceptance Criteria	NUREG 0800 Section 17.5 part II, Subsection A and NEI 06-17A, Rev 7
Description	<p>SRP Section 17.5 part II, subsection A, "Quality Assurance Program" states that the QAPD includes criteria used to identify items and activities to which the QA program applies. A list of the structures, systems and components (SSC's) and/or activities under the control of the QA program is required to be established and maintained at the applicant's or holder's facility.</p> <p>The applicant commits to Nuclear Energy Institute (NEI) QAPD template (NEI 06-14A, Revision 7, "Quality Assurance Program Description") as conditionally endorsed by an NRC SER dated November 3, 2009 (ML102370305). The template states that for ESP applications, the QAPD applies to those applicant activities that can affect either directly or indirectly the safety-related site characteristics or analysis of those characteristics. In addition, the QAPD applies to engineering activities that are used to characterize the site or analyze that characterization.</p> <p>Please clarify how the Victoria County Station's QAPD section "Quality Assurance Program" meets the acceptance criteria in SRP Section 17.5 part II, subsection A, "Quality Assurance Program" and aligns with the guidance mentioned above in NEI 06-14A, Revision 7, or please explain the basis for any exceptions.</p>

Title	Victoria County Station ESP - 03.05.01.06 - Aircraft Hazards - Question 19878
RAI ID	5396
Acceptance Criteria	SRP 3.5.1.6
Description	RS-002 provides guidance regarding the information that is needed to ensure potential hazards in the site vicinity (such as airports, dams, transportation routes, military and chemical facilities) are identified and evaluated to meet the siting criteria in 10 CFR 100.20 and 10 CFR 100.21. SSAR Section 2.2.3.1.4 does not provide sufficient information for the NRC staff to perform an independent determination of aircraft impact probability. Provide the aircraft crash rate, the assumptions for effective area determination, and the parameters for aircraft crash location conditional probability (per square mile) for each aircraft type and for each flight phase used in determining the total annual aircraft crash impact probability (F).

Title	Victoria County Station ESP - 11.02 - Liquid Waste Management System - Question 19672
RAI ID	5291
Acceptance Criteria	10 CFR Part 50 Appendix I, SRP 11.2, RG 1.109
Description	<p>10 CFR Part 50 Appendix I, SRP 11.2, RG 1.109 require various parameters to calculate the liquid effluent offsite doses to the public to be identified for review and evaluation. Values from Table 11.2.3-1 used in the NRC LADTAP code used to demonstrate compliance with 10 CFR 50 Appendix I cannot be verified. Regulatory Guide 1.109 is referenced as the basis for calculating values listed in Table 11.2.3.1.</p> <p>The staff evaluation of Table 11.2.3-1 yielded the following concerns:</p> <ol style="list-style-type: none">1. Several notes in Table 11.2.3-1 indicate that 12 counties are included in the area surrounding the site. Section 2.1.3.2 indicates 16 counties fall within the 10-50 mile radius of the Victoria County Station site, and section 2.1.3.3.2 specifically lists 16 different counties. What are the 12 counties being used for Table 11.2.3-1?2. In Table 11.2.3-1, The 50 Mile Parameters use a reference to justify a percentage to obtain a value for each parameter. Please provide the process and calculations used to determine these percentage values from the references for all 50 Mile Parameters in Table 11.2.3-1.3. Regulatory Guide 1.109 Appendix D and Table E-4 is listed as the basis for the values of consumption rates for fish consumed, invertebrate consumed and shoreline recreation. However it does not explain how the values were obtained based on the site specific consumption rates. Please verify and provide the process and calculations used to determine the consumption rate values for 5.9 kg/yr of fish consumed, 0.85 kg/yr of invertebrate consumed, and 12.8 hr/yr of shoreline recreation in Table 11.2.3-1.

Title	Victoria County Station ESP - 11.03 - Gaseous Waste Management System - Question 19661
RAI ID	5290
Acceptance Criteria	10 CFR Part 50 Appendix I, SRP 11.3, RG 1.109
Description	<p>10 CFR Part 50 Appendix I, SRP 11.3, and RG 1.109 require the main parameters required to calculate the gaseous effluent off site dose to the public to be identified for review and evaluation. The identification of the gaseous effluent dispersion parameter (X/Q) utilized in performing gaseous effluent dose calculations described in section 11.3.3.1 does not match the actual calculations. The X/Q value documented in Section 2.3.5.2 at the property boundary is $1.3E-5 \text{ sec/m}^3$. Verification of the calculations of the radionuclide concentrations in Table 11.3.3-3 indicates the X/Q is a value between $2.5E-5$ and $2.6E-5 \text{ sec/m}^3$.</p> <p>The staff evaluation of the X/Q value used to demonstrate compliance with 10 CFR 50 Appendix I and 10 CFR 20 Appendix B cannot be verified.</p> <p>Please confirm the X/Q dispersion parameter value and verify radionuclide concentrations listed in Table 11.3.3-3. Make changes as appropriate to any sections that may be impacted. Provide information as to the correct values.</p>

Title	Victoria County Station ESP - 11.02 - Liquid Waste Management System - Question 19660
RAI ID	5289
Acceptance Criteria	SRP 11.2 10 CFR Part 50 Appendix I, RG 1.109
Description	<p>10 CFR Part 50 Appendix I, SRP 11.2, RG 1.109 require main parameters required to calculate the liquid effluent off site dose to the public to be identified for review and evaluation. The identification of the liquid effluent flow rate utilized in performing liquid effluent dose calculations explained in section 11.2 does not match the actual calculations.</p> <p>NRC staff review of Section 11.2 determined that Table 11.2.3-3 indicated in the notes at the bottom of Table 11.2.3-3 that an effluent flow rate of 480 cfs was used. Staff verification of the radionuclide concentrations calculated in Table 11.2-3 indicate that 240 cfs or one half the value noted at the bottom of the table were used. Please confirm the current values in Table 11.2.3-3 are correct, or change this table or the note to be in agreement. Utilize any changes made to either the table or the note in any additional liquid effluent dose calculations.</p>