PMVictoriaESPPEm Resource

From: Jessie, Janelle
Sent: Friday, February 25, 2011 11:04 AM
To: david.distel@exeloncorp.com
Cc: Hale, Jerry; VictoriaESP Resource; Joshua.Trembley@exeloncorp.com
Subject: Victoria County Station ESP Application - Courtesy Copy of RAI Ltr#4
Attachments: RAI Letter No. 4--ML1105601250.pdf

Good Morning David,

Attached is a courtesy copy of RAI Letter# 4 which was issued today, February 25, 2011.

This letter covers the RAIs that were discussed during the clarification calls held this week.

Please note that the RAIs have a 30 day response period.

Thanks

Janelle

Hearing Identifier: Victoria_ESP_Public
Email Number: 187

Mail Envelope Properties (65FB43187ED87C46B3F00CB97D081E6026D1A48F14)

Subject: Victoria County Station ESP Application - Courtesy Copy of RAI Ltr#4
Sent Date: 2/25/2011 11:04:09 AM
Received Date: 2/25/2011 11:04:09 AM
From: Jessie, Janelle

Created By: Janelle.Jessie@nrc.gov

Recipients:
"Hale, Jerry" <Jerry.Hale@nrc.gov>
Tracking Status: None
"VictoriaESP Resource" <VictoriaESP.Resource@nrc.gov>
Tracking Status: None
"Joshua.Trembley@exeloncorp.com" <Joshua.Trembley@exeloncorp.com>
Tracking Status: None
"david.distel@exeloncorp.com" <david.distel@exeloncorp.com>
Tracking Status: None

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MESSAGE	322	2/25/2011 11:04:09 AM
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Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

February 25, 2011

Ms. Marilyn C. Kray
Vice President
New Plant Development
Exelon Generation
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION LETTER NO. 04 (SRP SECTIONS: 3.5.1.6 – AIRCRAFT HAZARDS, 11.02-LIQUID WASTE MANAGEMENT SYSTEM, 11.03-GASEOUS WASTE MANAGEMENT SYSTEM, AND 17.05-QUALITY ASSURANCE PROGRAM DESCRIPTION RELATED TO THE VICTORIA COUNTY STATION EARLY SITE PERMIT APPLICATION

Dear Ms. Kray:

By letter dated March 25, 2010, Exelon Nuclear Texas Holdings, LLC (Exelon) submitted an early site permit application for Victoria County Station pursuant to 10 CFR Part 52. The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application.

The staff has identified that additional information is needed to continue portions of the review and the request for additional information (RAI) is contained in the enclosure to this letter. To support the review schedule, Exelon is requested to respond within 30 days of the date of this letter. If the RAI response involves changes to application documentation, Exelon is requested to include the associated revised documentation with the response.

Should you have questions, please contact Janelle Jessie at (301) 415-6775 or Janelle.Jessie@nrc.gov.

Sincerely,

/RA/

Janelle B. Jessie, Project Manager
BWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-042

Enclosure: Request for Additional Information

February 25, 2011

Ms. Marilyn C. Kray
Vice President
New Plant Development
Exelon Generation
200 Exelon Way
Kennett Square, PA 19348

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By letter dated March 25, 2010, Exelon Nuclear Texas Holdings, LLC (Exelon) submitted an early site permit application for Victoria County Station pursuant to 10 CFR Part 52. The Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this application.

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Should you have questions, please contact Janelle Jessie at (301) 415-6775 or Janelle.Jessie@nrc.gov.

Sincerely,

/RA/

Janelle B. Jessie, Project Manager
BWR Projects Branch
Division of New Reactor Licensing
Office of New Reactors

Docket No. 52-042

Enclosure: Request for Additional Information

Docket No. 52-042
Enclosure: Request for Additional Information
Distribution:

JJessie, NRO	RRasmussen, NRO	LGoldin, OGC	NRO_DNRL_BWR
SGreen, NRO	ACubbage, NRO	D Brown, NRO	ERoach, NRO
SEdmonds, NRO	STammara, NRO	SWilliams, NRO	ZGran, NRO

E-RAI Tracking No: 5396, 5289, 5291, 5290, 5407
ADAMS Accession No.: ML110560125

OFFICE	BC: CQVB	BC: NRO/RSAC	BC: NRO/CHPB	PM:DNRL:BWR	TL:DNRL:BWR
NAME	RRasmussen*	DBrown*	ERoach*	JJessie*	ACubbage*
DATE	01/20/11	01/25/11	12/08/10	02/11/11	2/11/11

*Approval captured electronically in the electronic RAI system.

OFFICIAL RECORD COPY

Request for Additional Information No. 5396
Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: 03.05.01.06 - Aircraft Hazards
Application Section: 3.5.1.6

03.05.01.06-1

RS-002 provides guidance regarding the information that is needed to ensure that 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).

Request for Additional Information No. 5289
Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: 11.02 - Liquid Waste Management System
Application Section: 11.2

11.02-1

10 CFR Part 50 Appendix I, SRP 11.2, and RG 1.109 require that main parameters to calculate the liquid effluent off site dose to the public be identified for review and evaluation. The liquid effluent flow rate utilized in performing liquid effluent dose calculations identified in section 11.2 does not match the confirmatory calculations. Table 11.2.3-3 of the SSAR indicates in the notes at the bottom of the table that an effluent flow rate of 480 cfs was used.

Based on staff independent verification of the radionuclide concentrations calculated in Table 11.2-3, it appears that 240 cfs or one of half the value noted at the bottom of the table was used. Please confirm that the current values in Table 11.2.3-3 are correct, or change this table or the note to be in agreement and update the liquid effluent dose calculations as necessary.

Request for Additional Information No. 5291
Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: 11.02 - Liquid Waste Management System
Application Section: 11.2

11.02-2

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. The staff evaluation of Table 11.2.3-1 yielded the following concerns:

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.

Request for Additional Information No. 5290
Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: 11.03 - Gaseous Waste Management System
Application Section: 11.3

11.03-1

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 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 sec/m^3. The staff's 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. 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.

Request for Additional Information No. 5407
Victoria County Station ESP
Exelon Texas
Docket No. 52-042
SRP Section: 17.5 - Quality Assurance Program Description
Application Section: 17.5

17.5-1

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.

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.

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.

17.5-2

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.

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.

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.