

PMComanchePeakPEm Resource

From: Monarque, Stephen
Sent: Thursday, March 10, 2011 9:59 AM
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Cc: ComanchePeakCOL Resource; Otto, Ngola
Subject: Comanche Peak RCOL Chapter 11 - Section 11.2 - RAI Number 208
Attachments: RAI 5474 (RAI 208).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 March 10, 2011.

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

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Request for Additional Information (RAI), COLA No. 5474 Revision 1

RAI Letter Number 208

3/10/2011

Comanche Peak Units 3 and 4
Luminant Generation Company, LLC.
Docket No. 52-034 and 52-035
SRP Section: 11.02 - Liquid Waste Management System
Application Section: 11.2

QUESTIONS for Balance of Plant Branch 2 (SBPB)

11.02-17

In response to RAI 11.2-4, Luminant provided information on the administrative controls regarding the bypass around the discharge radiation monitor in the liquid waste management system. However, the following additional information is needed in the COLA FSAR to confirm compliance with Part 50, Appendix A, General Design Criterion (GDC) 60:

The RAI response states: "Prior to opening VLV-531 to establish the alternate flow path, the tanks (ATK-006A and ATK-006B) will be sampled and the contents confirmed to meet the discharge specifications." This statement should be included in the FSAR to ensure that tank concentrations are less than the effluent concentration limits (ECLs) specified in 10 CFR 20, Appendix B prior to opening the bypass valve, in order to comply with Part 50, Appendix A GDC 60 and 64.

Provide additional information in the FSAR to confirm that an unmonitored release will not occur during the scenario where the unmonitored discharge bypass is being used for an offsite discharge and the monitor tank sample is not indicative of the actual radionuclide concentration of the tanks (for example due to human error, or analysis equipment error). Provide additional details in the FSAR to ensure that this unmonitored discharge effluent will be less than the effluent concentration limits specified in 10 CFR 20, Appendix B.

NUREG-0800, Standard Review Plan (SRP) Section 11.2, "Review Procedures," 3.F specifies that NRC guidance includes industry standards including ANS 55.6. ANS 55.6 Section 5.5 "Process and Effluent Radiation Monitoring" states: "The process and effluent radiation monitoring devices shall be designed to provide continuous monitoring and recording of information about radioactive liquids being released to the environment from the [Liquid Radwaste Processing Systems] (LRWPS). Effluent radiation monitors in the system shall automatically terminate the release of radioactive waste upon determination of high radiation (above a predetermined set point) in the discharge... All pathways of liquid radioactive releases to the environment shall be monitored." The current design has a bypass around the radiation monitor, therefore creating a pathway of liquid radioactive release to the environment that is not monitored. In addition, the design has isolation provisions for the radiation monitor as well, so it cannot be relied upon for monitoring in bypass discharge configurations. Table 1.9 -212, "Comanche

Peak Nuclear Power Plant Units 3 & 4 Conformance with Standard Review Plan Chapter 11 Radioactive Waste Management,” does not show this exception from SRP 11.2 guidance. Provide additional details in the FSAR either addressing how the design ensures the pathway of liquid radioactive release to the environment will always be monitored or specifically justify the exception from SRP 11.2 and ANS 55.6 in FSAR Section 11.2 and Table 1.9.-212.