

WBN2Public Resource

From: Poole, Justin
Sent: Friday, March 04, 2011 4:55 PM
To: Crouch, William D
Cc: WBN2HearingFile Resource; Milano, Patrick
Subject: Discussion topics for a planned meeting on Chapter 11 and 12

Bill,

The staff has done a preliminary review of your RAI responses to Chapters 11 and 12. Below I have included some of the concerns/clarifications the staff has after their this initial review. Based on the complexity of these concerns/clarifications, we would like to have a public meeting with your staff. We will use what's discussed below as initial discussion topics for the meeting. Since the reviewer has not finished his review in detail, I will inform you if we intend to discuss any additional topics that may result from the detailed review.

Justin C. Poole
Project Manager
NRR/DORL/LPWB
U.S. Nuclear Regulatory Commission
(301)415-2048
email: Justin.Poole@nrc.gov

The biggest issues are associated with the calculation of offsite doses from gaseous effluent releases (Table 11.3-10 FSAR Section 11.3). TVA has not provided an adequate basis for the changes they made to the feeding factor (in Amendment 98) nor the terrain adjustment factors (and X/Q, D/Q) in Amendment 100, and in the mark up Amendment 103 included in their response. The information in the responses to questions (22), and (23) in Enclosure 1 (& 11.3.a in Enclosure 2), respectively, do not provide an adequate basis for either. These changes form the basis for the complete revision to Table 11.3-10 that is included in the Amendment 103 mark up (Enclosure 3). The TVA re-analysis of the offsite doses may impact their Environmental Impact Statement (EIS), as well as the NRC's draft EIS.

TVA still has not cleared up the uncertainty over which source term was used to calculate the offsite doses (both the liquid effluent doses in Table 11.2-7 and the gaseous doses in Table 11.3-10). The answer to question (9) in Enclosure 1, concerning the source term used for liquid effluent doses, appears inconsistent with the answer to question (3.c) in Enclosure 2. In addition, answer to questions (18) and (20) in Enclosure 1 appear to be incorrect. The answer to (18) states that table 3-20 of TVA's FSEIS is in error and that the correct source term that was used to calculate the offsite doses is given in FSAR Table 11.3-7c. The answer to (20) indicates that Table 11.3-7c is based on the normal values in NUREG-0017 adjusted for WBN. However, The isotopic source term in Table 11.3-7c reflects a 1% failed fuel maximum design basis, not the normal release assumptions of NUREG-0017 which are the appropriate source term assumptions for demonstrating that the design criteria of 10 CFR 50 Appendix A are met.

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Created By: Justin.Poole@nrc.gov

Recipients:

"WBN2HearingFile Resource" <WBN2HearingFile.Resource@nrc.gov>
Tracking Status: None
"Milano, Patrick" <Patrick.Milano@nrc.gov>
Tracking Status: None
"Crouch, William D" <wdcrouch@tva.gov>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

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