

September 7, 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. 12  
(SRP SECTIONS: 11.03–GASEOUS WASTE MANAGEMENT SYSTEM)  
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 U.S. 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. 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 Tekia Govan at (301) 415-6197 or [Tekia.Govan@nrc.gov](mailto:Tekia.Govan@nrc.gov).

Sincerely,

*/RA/*

Tekia V. Govan, Project Manager  
BWR Projects Branch  
Division of New Reactor Licensing  
Office of New Reactors

Docket No. 52-042

Enclosure: Request for Additional Information

September 7, 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. 12  
(SRP SECTIONS: 11.03–GASEOUS WASTE MANAGEMENT SYSTEM)  
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 U.S. 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. 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 Tekia Govan at (301) 415-6197 or [Tekia.Govan@nrc.gov](mailto:Tekia.Govan@nrc.gov).

Sincerely,

*/RA/*

Tekia V. Govan, Project Manager  
BWR Projects Branch  
Division of New Reactor Licensing  
Office of New Reactors

Docket No. 52-042

Enclosure: Request for Additional Information

Distribution:

TGovan, NRO            LGoldin, OGC            NRO\_DNRL\_BWR  
SGreen, NRO            SPrice, OGC            SWilliams, NRO  
ZGran, NRO            ERoach, NRO

E-RAI Tracking No: 5956  
ADAMS Accession No.: ML112500298

OFFICE	BC: NRO/RSAC	BC:NRO/RSAC	PM:DNRL:BWR
NAME	ZGran*	ERoach*	TGovan*
DATE	7/27/2011	8/11/2011	9/6/2011

\*Approval captured electronically in the electronic RAI system.

**OFFICIAL RECORD COPY**

Request for Additional Information No. 5956 Revision 0

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

QUESTIONS for Health Physics Branch (CHPB)

11.03-3

During the staff's independent verification of SSAR Table 11.3.3-5, the staff reviewed the calculated values, comparing the staff's values to Table 11.3.3-5. The staff generated version of Table 11.3.3-5 identified values 2-3 times higher than what is presented by the applicant's Table 11.3.3-5. The differences in this table also results in changes in the results for the staff's version of Table 11.3.3-6 and Table 11.3.3-7.

In comparing the dose objectives of 10 CFR 50 Appendix I, the staff calculated values for Table 11.3.3-6 that do not meet the dose objectives for skin and total body dose at the site boundary. Comparison of the results for Table 11.3.3-7 also shows a significant difference in the value obtained for Total Body Dose.

Upon comparison of the inputs provided in the Response to Request for Additional Information Letter No. 10 dated June 23, 2011, and what is referenced in the application for the inputs into GASPARE, there is a discrepancy (difference) over the values used for the XOQ and DOQ values for the MEI calculations, Table 2.3.5-8. When compared, the results of Table 11.3.3-6 dose to the skin's value either falls below the limits using data from the RAI response, or above of the limits using data provided in the Victoria County ESP application. This difference in XOQ and DOQ values result in differences between the External and Inhalation Dose Pathways in the staff generated version of Table 11.3.3-5 and the applicants Table 11.3.3-5 which is used as a source of data for Tables 11.3.3-6 and 11.3.3-7. Please verify values described in the SSAR and explain the difference between the XOQ and DOQ values used. Please revise SSAR and affected tables to correct values or explain the differences.