

## SeabrookNPEM Resource

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**From:** Plasse, Richard  
**Sent:** Tuesday, March 15, 2011 1:28 PM  
**To:** Cliche, Richard  
**Subject:** FW: Follow-up RAI for Seabrook 4.7.11.  
**Attachments:** Draft Follow up RAI Seabrook Section 4 7 11 - oyee ng.docx

[Another draft RAI](#)

**Hearing Identifier:** Seabrook\_License\_Renewal\_NonPublic  
**Email Number:** 2223

**Mail Envelope Properties** (Richard.Plasse@nrc.gov20110315132800)

**Subject:** FW: Follow-up RAI for Seabrook 4.7.11.  
**Sent Date:** 3/15/2011 1:28:21 PM  
**Received Date:** 3/15/2011 1:28:00 PM  
**From:** Plasse, Richard

**Created By:** Richard.Plasse@nrc.gov

**Recipients:**  
"Cliche, Richard" <Richard.Cliche@fpl.com>  
Tracking Status: None

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MESSAGE	19	3/15/2011 1:28:00 PM
Draft Follow up RAI Seabrook Section 4 7 11 - oyee ng.docx		26331

**Options**

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**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
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## Draft Follow up RAI for Seabrook Station LRA related to 4.7.11

### Follow-up RAI 4.7.11-1b

#### Background:

In its response to RAI 4.7.11 dated ~~xxx~~February 3, 2011, the applicant stated that only normal service radiation exposure of MEQ was subjected to a TLAA. The applicant clarified that it has a calculation of total integrated radiation dose design values for a 60-year plant life for various environmental zones and the calculation has been used to evaluate the 60-year dose impact on MEW equipment in their respective zones. The applicant stated that the 60-year design dose values were compared to the current design dose limits of the equipment and it was determined that the 60-year dose limits are bounded by the existing equipment design dose limits. The applicant's disposition of this TLAA in accordance with 10 CFR 54.21(c)(1)(ii) indicating that the effect of aging on the intended functions of equipment have been projected to be bounded by existing equipment design limits. The staff finds the disposition not acceptable because the existing analyses (equipment design dose limits) has not been revised and extended.

Comment [o1]: Is this right? Was this missing?

Comment [o2]: What does this mean?

Comment [o3]: Define. Is this MEW or MEQ?

Comment [C4]: Added (ii) not acceptable

#### Issue:

While the applicant stated that the 60-year dose limits are bounded by the existing equipment design dose limit, the applicant has not provided the projected 60-year doses for all the zones and the dose limits of the equipment within the scope of mechanical equipment qualification (MEQ). Without such information, the staff cannot evaluate the adequacy of the TLAA. There is not enough information for the staff to make the determination that the TLAA of normal service radiation exposure in MEQ has been properly dispositioned. The Analysis section, as amended, of the LRA Section 4.7.11, as amended by letter dated ~~xxx~~February 3, 2011, does not discuss the detail regarding the calculated dose limits and equipment design dose limits for normal service radiation exposure. Furthermore, the applicant did not amend the proposed Commitment No. 45. Commitment No. 45, as its current stated, did not identify what portion of the mechanical equipment qualification files that will be revised and what is the acceptance criteria of the such revision.

Comment [o5]: define.

Comment [o6]: Why do they need to amend it? The second sentence sounds awkward.

~~The staff finds the applicant's disposition in accordance with 10 CFR 54.21(c)(1)(ii) not acceptable because the existing analyses (equipment design dose limits) has not been revised and extended. Rather, the~~ The applicant demonstrated that the existing analyses (equipment design dose limits) are bounding for the projected 60-year doses for all zones. The staff noted that this demonstration demonstration and the TLAA of the normal service radiation exposure is consistent with a dispositioned in accordance with 10 CFR 54.21(c)(1)(i). As discussed in SRP-LR Section 4.7.3.1.1 states that for the disposition of 10 CFR 54.21(c)(1)(i), the existing analyses should be shown to be bounding during the period of extended operation.

Comment [o7]: Clarify what the applicant's actual disposition was to begin with. Maybe put that in the BG section.

#### Request

(1) Provide the design dose limits of the equipment within the scope of MEQ and the calculated total integrated radiation dose 60-year doses for all the zones to justify that TLAA of normal service radiation exposure in MEQ has been properly dispositioned.

(2) Amend the Analysis section of the LRA Section 4.7.11 and provide sufficient detail to support the TLAA disposition to delineate the TLAA of normal service radiation exposure to in MEQ. Provide sufficient detail to support the TLAA disposition. Revise Commitment No. 45 to identify the information to be revised and the acceptance criteria of the revision or justify why the existing Commitment No. 45 is acceptable.

Comment [o8]: We should not be telling the applicant what to do. Is there a better way that you can word this?

Comment [C9]: I add that "... or justify..."

(3) ~~Revise the Disposition Section of the LRA Section 4.7.11 accordingly.~~ Amend the disposition of TLAA of normal service radiation exposure to MEQ to 10 CFR 54.21(c)(1)(i) or justify why ~~other the existing TLAA dispositions are~~ disposition is acceptable. ~~If LRA Section 4.7.11 is amended as a result of RAI 4.7.11-1b, Pp~~ provide an updated UFSAR supplement section in LRA Appendix A ~~consistent with the revisions, commensurate with the amended LRA Section 4.7.11.~~

**Comment [o10]:** Should it be amend the disposition or justify why your existing disposition is appropriate?

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