CCNPP3eRAIPEm Resource

From: Arora, Surinder
Sent: Monday, September 10, 2012 2:23 PM
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Cc: CCNPP3eRAIPEm Resource; Segala, John; Wilson, Anthony; Vrahoretis, Susan; McCoppin, Michael; Stutzcage, Edward; Clark, Phyllis; McLellan, Judith
Subject: CCNPP3 - DRAFT RAI 371 RPAC 6595
Attachments: DRAFT RAI 371 RPAC 6595.doc

Paul,

Attached is Draft RAI No. 371 (eRAI No. 6595) pertaining to sections 12.3.-12.4 of the Calvert Cliffs Unit 3 FSAR. This is a **Phase 4** RAI and was necessitated because the technical reviewer needs additional information on the changes that were incorporated during Revision 8 of your application. You have until September 24, 2012 to review it and decide whether you need a conference call to discuss the RAI before the final issuance. After the phone call or after September 24, 2012, the RAI will be finalized and sent to you for your response. You will then have 30 days to provide a technically complete response or an expected response date for the RAI.

Thanks

SURINDER ARORA, PE
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From: Arora, Surinder

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Request for Additional Information 371 (eRAI 6595)

DRAFT
Issue Date: 9/10/2012
Application Title: Calvert Cliffs Unit 3 - Docket Number 52-016
Operating Company: UniStar
Docket No. 52-016
Review Section: 12.03-12.04 - Radiation Protection Design Features
Application Section: 12.3

QUESTIONS

12.03-11

10 CFR 52.79(a) requires in part that the final safety analysis report describes the facility, presents the design bases and the limits on its operation, and presents a safety analysis of the structures, systems, and components of the facility as a whole. Furthermore, the final safety analysis report shall include information at a level sufficient to enable the Commission to reach a final conclusion on all safety matters, including information on the kinds and quantities of radioactive materials expected to be produced and the means for controlling and limiting radiation exposures within the limits set forth in 10 CFR Part 20.

In addition, 10 CFR 20.1101(b) requires that the licensee use, to the extent practical, procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses and doses to members of the public that are as low as is reasonably achievable.

COL Item 12.3-4 (in FSAR Section 12.3.2.3) states that, "A COL applicant that references the U.S. EPR design certification will maintain dose rates below the administrative limits shown in Table 12.3-14 or revise nearby or adjacent radiation zone designations as necessary based on site-specific dose analysis for the areas listed in Table 12.3-14." In response to this COL Item, in order for the staff to adequately evaluate the application, it is the staffs position that the applicant commit to one of the above two COL options (i.e, commit to maintain dose rates below the administrative dose rate limits shown in FSAR Table 12.3-14, or if any of these administrative dose rate limits are exceeded, revise the radiation zone designations where applicable, for those areas where the administrative dose rate limits have been exceeded). If the applicant's response to COL Item 12.3-4 does not specify the selection of only one of the two COL options, then it is the staff's position that the applicant provide sufficient information in the FSAR for the staff to perform an independent evaluation of both options to determine their acceptability.

In the applicant's response to COL Item 12.3-4, the applicant must ensure that all sections of the FSAR are accurate, consistent, and complete regarding the approach taken. For example, if the applicant chooses to maintain dose rates below the administrative limits shown in U.S. EPR FSAR Table 12.3-14, the FSAR should be modified, as necessary, to reflect the amount of resin use, boric acid use, waste generation rates, etc., that will be necessary in each of these areas to maintain the associated dose rates below the administrative limits.

Alternately, if the applicant chooses to update the radiation zone maps, the applicant must ensure that all other FSAR changes that are necessary as a result of updating the maps, such as possible changes to worker dose estimates, are made as a result of the zoning changes.