

## PMComanchePeakPEm Resource

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**From:** ComanchePeakCOL Resource  
**Sent:** Monday, September 10, 2012 3:31 PM  
**To:** PMComanchePeakPEm Resource  
**Subject:** FW: Comanche Peak Cat III review Analysis-Discussion for September 7, 2012 call  
**Attachments:** Comanche Peak Cat III review Analysis-Discussion 9-6-12.doc

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**From:** Monarque, Stephen  
**Sent:** Thursday, September 06, 2012 8:36 AM  
**To:** Woodlan, Don; Conly, John; ComanchePeakCOL Resource  
**Subject:** FW: Comanche Peak Cat III review Analysis-Discussion for September 7, 2012 call

Don/John,

I am sending this discussion points to you in advance of our call tomorrow.

Thanks,

Stephen Monarque  
Lead Project Manager  
Comanche Peak COL  
NRO/DNRL/LB2  
301-415-1544

**Hearing Identifier:** ComanchePeak\_COL\_Public  
**Email Number:** 1735

**Mail Envelope Properties** (0AA17736E4C4154CA37233EEBFC8DEB2010B2CA0B91B)

**Subject:** FW: Comanche Peak Cat III review Analysis-Discussion for September 7, 2012 call  
**Sent Date:** 9/10/2012 3:31:27 PM  
**Received Date:** 9/10/2012 3:31:29 PM  
**From:** ComanchePeakCOL Resource

**Created By:** ComanchePeakCOL.Resource@nrc.gov

**Recipients:**  
"PMComanchePeakPEm Resource" <PMComanchePeakPEm.Resource@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR02.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	462	9/10/2012 3:31:29 PM
Comanche Peak Cat III review Analysis-Discussion 9-6-12.doc		38906

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

Comanche Peak – COL Application On-site and transportation of fresh fuel analysis

**Basis:**

Applicant's SNM Physical Protection Program (SNM PPP) Description, DEC 2011

CAT III orders

RIS 2005-22

**Discussion:**

Standard protocols for new reactors in the aspects of fresh fuel transport delivery to the site, fuel transport off of the site and on-site physical protection have been as follows:

1. Have the SNM PPP sent in as an annex to the physical security site plan if the PA will not be operational at the time of fuel delivery

1.a. Have the annex rescinded via 50.54p after the PA is operational

2. Develop a transportation plan for fresh fuel.

2.a. This plan remains as a stand-alone plan and accommodates damaged fuel transport off the site and delivery of fresh fuel.

2.c. The plan may take credit for the transport plan of the manufacturer; however a licensee plan will remain in place to refer to the reliance on the manufacture's plan and describe the administrative tasks associated with transportation operations.

3. An RAI is written covering the CAT III orders.

**Analysis:**

a. The CP applicant has provided a SNM PPP that is a stand-alone document. They may consider rescinding it and sending an annex for the fixed site portion of the plan. In addition they could also send in a stand-alone plan for fresh fuel transport. The annex can be 50.54p rescinded after the PA is operational and the transport plan would remain in place.

The transport security plan may take credit for a fuel manufacturer to provide security for fresh fuel delivery or transport out from the PA. The words in the FSAR could be incorporated in this manner:

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*In accordance with [10] CFR 73.67(g) 1-3, as clarified by RIS 2005-22, written agreements will be developed and implemented with the supplying fuel manufacturer to transport new fuel assemblies (including returning shipments) between the fuel manufacturing facility and the CP 3 & 4 site under the fuel manufacturer's Transportation Physical Security Plan. Under these agreements, the transfer of responsibility for transportation security of new fuel assemblies, including damaged new fuel assemblies, occurs at the CP 3&4 site when CP accepts delivery of new fuel assemblies from the carrier (manufacturer) or the carrier accepts new fuel from CP 3&4. Under these agreements, the fuel manufacturer will be responsible for the in transit physical protection of the new fuel assemblies. The manufacturer and CP will maintain responsibility for the appropriate administrative and Material Control and Accounting (MC&A) requirements when acting as a shipper or receiver.*

However a transport security plan must be maintained by the applicant/licensee that indicates such and has the administrative and MC&A provision outlined in it as well.

b. It is not clear that the CAT III orders were conveyed to this applicant as an RAI. UF6 has been covered as seen in the documents for the application review; this implies they (i.e., the orders) may have been conveyed

c. The RIS 2005-22 in regard to the requirements of retaining plans for 3 years is not addressed in their SNM PPP.

**Conclusion:**

We can develop RAIs to request:

1. For a transport security plan be developed and sent in as a stand-alone plan
  - 1.a. The plan address the 3 year retention requirement
  - 1.b. They can rely on the manufacturer's transport plan with the correct wording in the FSAR
2. The existing SNM PPP be rescinded and sent back in w/ as an annex to the site plan
  - 2.a. The plan address the 3 year retention requirements
  - 2.b. The plan only address the fixed site CAT III requirements before PA is operational
3. How the applicant plans to address the CAT III orders

It probably would be best to discuss this approach with the applicant before we send out RAIs. This approach will keep us establishing a consistent manner with how these requirements are being addressed.

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