

PMTurkeyCOLPEm Resource

From: Comar, Manny
Sent: Thursday, November 08, 2012 4:11 PM
To: orthen, Richard; Raymond Burski; Steve Franzone; STEVEN.HAMRICK; TurkeyCOL Resource; William Maher
Cc: Comar, Manny
Subject: Draft RAI 6918 related to SRP Section 11.05 Process and Effluent Radiological Monitoring Instrumentation and Sampling for the Turkey Point Units 6 and 7 combined license application.
Attachments: draft RAI 6918_TPN.doc

To All,

Attached is the draft of RAI No:6918 regarding section 11.05 Process and Effluent Radiological Monitoring Instrumentation and Sampling for the Turkey Point Units 6 and 7 combined license application.

If you need a conference call to discuss the question(s) of the draft RAIs please contact me at 301-415-3863. Unless you request additional clarification we will normally issue the RAI as final within 3 to 5 days, from today.

Thanks

Manny Comar
Senior Project Manager
NRO/DNRL/NWE1
Nuclear Regulatory Commission
301-415-3863
<mailto:manny.comar@nrc.gov>

Hearing Identifier: TurkeyPoint_COL_Public
Email Number: 718

Mail Envelope Properties (377CB97DD54F0F4FAAC7E9FD88BCA6D0B1658F8941)

Subject: Draft RAI 6918 related to SRP Section 11.05 Process and Effluent Radiological Monitoring Instrumentation and Sampling for the Turkey Point Units 6 and 7 combined license application.
Sent Date: 11/8/2012 4:10:40 PM
Received Date: 11/8/2012 4:10:41 PM
From: Comar, Manny

Created By: Manny.Comar@nrc.gov

Recipients:

"Comar, Manny" <Manny.Comar@nrc.gov>
Tracking Status: None
"orthen, Richard" <richard.orthen@fpl.com>
Tracking Status: None
"Raymond Burski" <raymond.burski@fpl.com>
Tracking Status: None
"Steve Franzone" <steve.Franzone@fpl.com>
Tracking Status: None
"STEVEN.HAMRICK" <steven.hamrick@fpl.com>
Tracking Status: None
"TurkeyCOL Resource" <TurkeyCOL.Resource@nrc.gov>
Tracking Status: None
"William Maher" <William.maher@fpl.com>
Tracking Status: None

Post Office: HQCLSTR01.nrc.gov

Files	Size	Date & Time
MESSAGE	640	11/8/2012 4:10:41 PM
draft RAI 6918_TPN.doc		33786

Options

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

Request for Additional Information

Application Title: Turkey Point Units 6 and 7 Operating Company: Florida P and L
Docket No. 52-040 and 52-041

Review Section: 11.05 - Process and Effluent Radiological Monitoring Instrumentation and Sampling
Systems

Application Section: 11.5.8

QUESTIONS

FSAR Tier 2, Rev. 3, Section 11.5.8 endorses the use of NEI ODCM Template 07-09A (Revision 0, March 2009) to meet COL Information Item 11.5-1 until a plant and site-specific ODCM is prepared, before fuel load, under the requirements of a license condition described in FSAR Section 13.4, Table 13.4-201, Item 9. The development of the site specific ODCM and implementing procedures should meet the provisions of GL 89-01 (Supplement No. 1), Radiological Assessment Branch Technical Position (Revision 1, November 1979) included as Appendix A in NUREG-1301, as ODCM guidance for PWRs, and the guidance of NUREG-0133, "Preparation of Radiological Effluent Technical Specifications for Nuclear Power Plants," October 1978, and NUREG-0543, "Methods for Demonstrating LWR Compliance with the EPA Uranium Fuel Cycle Standard (40 CFR Part 190)."

However, FSAR Tier 2, Rev. 3, Section 11.5.8 does not address unique site-specific conditions that are not covered in the NEI ODCM Template 07-09A. The FSAR does not consider how the ODCM will control gaseous effluent releases and doses to members of the public given that Turkey Point 3&4 and Turkey Point 6&7 will be contributing to and sharing a single dose allocation to members of the public under 10 CFR 20.1301 and 20.1302; 10 CFR 20.1301(e) in complying with 40 CFR Part 190; and the unity-rule in meeting liquid and gaseous effluent concentration limits of 10 CFR Part 20 (Appendix B, Table 2, Columns 1 and 2). NUREG-0543 addresses compliance issues for sites with multiple reactor units when considering all sources of radiation exposures, including doses due to liquid and gaseous effluent releases and contributions from external radiation from buildings and staging areas containing radioactive materials and wastes.

Accordingly, the applicant is requested to describe in FSAR Tier 2, Section 11.5.8 the administrative program and procedures that will be used to coordinate all liquid and gaseous effluent releases and dose allocations to members of the public between Turkey Point 3&4 and Turkey Point 6&7 in complying with NRC regulations, as noted above.