

PMTurkeyCOLPEm Resource

From: Comar, Manny
Sent: Wednesday, November 20, 2013 3:34 PM
To: Franzone, Steve (Steve.Franzone@fpl.com)
Cc: TurkeyCOL Resource
Subject: FW: FPL L-2013-260, Response to NRC RAI Letter 77, eRAI7112, Q.11.03-1

From: Dehmel, Jean-Claude
Sent: Monday, November 04, 2013 2:16 PM
To: Comar, Manny
Cc: McCoppin, Michael; TurkeyCOL Resource
Subject: FW: FPL L-2013-260, Response to NRC RAI Letter 77, eRAI7112, Q.11.03-1

Manny...

In light of the joint telecom, NRC & FPL on Oct. 31, and staff observations on FPL's response to NRC RAI Letter 77, please note the expected status of staff observations listed in my email of Oct. 18 (see below):

1. For item 1, the applicant recognized that a met parameter entry provided in its Aug. 9, 2013 letter was a typo and agreed to revise that entry on p.4 of 9 in a revised RAI response to NRC RAI Letter 77.
2. For item 2, the applicant recognized that the proposed revision of the FSAR (p.6 of 9, Aug. 9, 2013 letter) was incomplete in that it does not acknowledge compliance with SRP Section 11.3 acceptance criteria in transferring the results of the consequence analysis from the AP1000 DCD to FPL site-specific met data. The applicant agreed to revise the proposed FSAR text insert in an updated RAI response to NRC RAI Letter 77.
3. For item 3, the applicant recognized that demonstration of compliance with 40 CFR 190 was incomplete in its Aug. 9, 2013 letter (p.7 of 9) in that it did not quantify doses from external radiation (e.g., buildings and radioactive material storage, etc.) and did not explain in the footnotes how doses from TP Units 3&4 were developed and reported in the RAI response since the posted results could not be inferred from the cited references. The applicant agreed to revise the proposed FSAR text insert and footnotes in an updated RAI response to NRC RAI Letter 77.
4. For items 4 and 5, the staff and applicant compared a number of parameters in trying to reconcile discrepancies between Staff and applicant GASPARD II MEI dose results using data presented in Enclosure 2 of FPL's letter of Aug. 9, 2013. The applicant has made available to the staff the associated dose calculation package through its electronic reading room. Based on a review of the calculation package, I was able to reconcile one parameter entry, that when applied, resolved the apparent differences in a specific set of dose results, as noted below. The calculation package that was review is pdf file No.: 25409-000-M0C-HARA-00001-006, Rev. 6, 6/18/2012. This review of the calculation package and re-running of my GASPARD II case and confirmation of FPL's results close out Items 4 and 5 of my prior email.
6. New Item – A comparison of the AP1000 DCD FSAR, Rev. 19, Section 11.3.3.5 and DCD Table 11.3-4 against TP Units 6&7 FSAR Rev. 4, Table 2.3.5-202 indicates that the site boundary met data presented in TP Units 6&7 FSAR Rev. 4, Table 2.3.5-202 is more conservative than that applied in the DCD in demonstrating compliance with 10 CFR Part 20, App. B, Col. 1 ECLs. The met data used in the AP1000 DCD FSAR Table 11.3-4 (Sheet 2, Footnote c) is 2.0E-05 sec/m³ while the corresponding FPL site-specific boundary met data is 3.4E-05 sec/m³ (SSE, 0.35 miles). As a result, FPL needs to confirm

compliance with 10 CFR Part 20, App. B, Col. 1 ECLs using its site-specific met data and tabulate its corresponding version of that AP1000 DCD table in the FPL FSAR.

Given the above, the staff is on hold pending a submission of a revised RAI response from the applicant in addressing Items 1 to 3 as summarized here. Items 4 and 5 are closed out and require no further action.

Please transmit the new item 5 to FPL for discussion as it can be added to the response of the existing RAI.

Regards, Jean-Claude...

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From: Dehmel, Jean-Claude

Sent: Friday, October 18, 2013 10:26 AM

To: Comar, Manny

Cc: Michael.McCoppin@nrc.gov

Subject: FPL L-2013-260, Response to NRC RAI Letter 77, eRAI7112, Q.11.03-1

Manny...

Please convey the flowing staff observations to FPL on its response to NRC RAI Letter 77, eRAI7112, Q.11.03-1. We will need to go over them for clarification and issue a supplemental RAI as needed.

1. Attachment, p.4 of 9 – The X/Q entry for the vegetable garden (NW, 4.8 miles) has been changed from 9.6E-8 to 9.8E-8 s/m³ in the proposed revision of FSAR Table 2.3.5-202. The applicant is requested to confirm this change since it is not described in the body of the response.
2. Attachment, p.6 of 9 – The suggested insertion (single sentence) for FSAR, Section 11.3.3.4 does not tie the comparison of the AP1000 met data and confirm that the resulting dose from a postulated failure of an offgas system component does not exceed the SRP acceptance criterion of 100 mrem. The applicant is requested to acknowledge in the TP 6&7 FSAR that, based on a comparison of FPL site-specific met data against that assumed in the AP1000 DCD's consequence analysis, the result indicates that the SRP dose acceptance of 100 mrem is met after adjusting for the difference in met data between the AP1000 DCD and FPL site-specific atmospheric dispersion at the TP Units 6&7 site boundary.
3. Attachment, p.7 of 9 – Using the information provided in five new references (No. 205 to 209 on annual radiological effluent releases), the staff cannot duplicate the reported doses for TP Units 3&4 in TP Units 6&7 FSAR, Rev. 4, Table 11.3-206 in demonstrating compliance with 40 CFR 190 dose standards for all plants. Moreover, the applicant is requested to confirm whether the results attributed to TP Units 3&4 in FSAR Rev. 4, Table 11.3-206 also include dose contributions from external penetrating radiation from plant buildings containing radioactive materials and radwaste storage facilities.
4. Enclosure 2, p.4 of 4 – A review of the met data listed for the dose receptors of interest indicates that the data set for the "Meat Animal" exposure pathway is not listed when compared to FSAR, Rev. 4, Table 2.3.5-202. The applicant is requested to confirm whether the met data set and ingestion rates are complete and consistent with the locations of the identified dose receptors of interest in demonstrating compliance with 10 CFR Part 50, Appendix I design objectives for gaseous effluents.
5. In attempting to confirm MEI dose results using the additional information provided in this FPL response, the staff noted the following:
 - a. Agreement on MEI results for beta and gamma air doses, plume and ground external doses, inhalation doses at the residence, and infant total doses, and population thyroid and total body collective doses.

- b. Disagreement on garden vegetable pathway doses for adult, teen, and child age groups for all organs, except for thyroid doses.
- c. Agreement on garden vegetable pathway doses to thyroid of adult, teen, and child age groups.
- d. Disagreement on meat pathway doses for adult, teen, and child age groups over all organs.

For this item, the applicant is requested to confirm whether the applicant's analysis has applied consistent consumptions rates and met data for these locations and age groups.

Regards, Jean-Claude...

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"Franzone, Steve (Steve.Franzone@fpl.com)" <Steve.Franzone@fpl.com>

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