

## SummerRAIsPEm Resource

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**From:** Gleaves, Bill  
**Sent:** Thursday, October 20, 2016 3:15 PM  
**To:** SummerRAIsPEm Resource  
**Cc:** Kallan, Paul  
**Subject:** FW: LAR 13-09 Annex and Radwaste Building Changes

**Importance:** High

Clarifications from 10-20-2016 meeting on the subject.

Billy  
William (Billy) Gleaves  
Lead Project Manager for  
V.C. Summer Units 2 and 3  
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US NRC, Office of New Reactors

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**From:** Kallan, Paul  
**Sent:** Thursday, October 20, 2016 3:02 PM  
**To:** Gleaves, Bill  
**Subject:** LAR 13-09 Annex and Radwaste Building Changes  
**Importance:** High

Hi Billy,

Please put this email in ADAMS and once there is a ML number please send a copy of the pdf to April Rice and Nick Kellenberger. I am out till Tuesday morning.

Thank you Paul

NRC staff has the following comments with the response to RAI 11, which we will discuss in the meeting tomorrow on Thursday October 20, 2016. All comments are related to the response to item 11. The responses to items 9 and 10 are acceptable.

1. The last paragraph on the bottom of Page 9 of 15 of the response, starts with the sentence, "The radwaste bunkers were included into the design of the AP1000 Radwaste Building to allow the segregation of materials with radioactivity content higher than the dry active waste (DAW) secondary side spent resin and miscellaneous contaminated / activated components or tools exhibiting medium to high levels of radioactivity that reflect the isotopic activity limits imposed by the Category IIc design of the Radwaste Building and are limited by the radiation zoning requirements of adjacent spaces." This sentence is confusing and needs to be removed or revised. It appears to be indicated that the bunkers will be used to store radioactive material higher than what is allowed by the RW-IIc building classification, which would be unacceptable.

2. In the proposed FSAR update on Page 14 of 15, the second paragraph states that, “The evaluation assumes two storage scenarios of the maximum amounts of CPS and EDI resins that could be generated over one cycle of operation and then stored in a single, unventilated bunker for one year.” I don’t believe that it should state that the two storage scenarios represent, “the maximum amounts of CPS and EDI resins that could be generated over one cycle of operation” Because neither of the two scenarios appear to account for the maximum amount generated in one year of both CPS and EDI resin (the first scenario assumes 11 cubic feet of EDI resin, which is much less than even a single EDI unit, and the second scenario doesn’t even consider CPS resin, so neither assumes the maximum amount of both stored in one bunker). Therefore, the language indicating that it is the maximum amount of resin that could be generated over one cycle of operation, should be removed/revise.
3. In the proposed FSAR update on Page 14 of 15, the last sentence of the second paragraph should be removed, because there is no commitment that a year worth of resin will not be stored all in the same bunker and it is misleading to state that the calculated hydrogen concentration volume percent will be reduced because there are multiple bunkers.
4. There is no discussion in the FSAR of administrative controls to ensure that the 4% hydrogen concentration will not be exceeded (it says that a new evaluation will need to be performed if the total volume, higher activity, or storage period are exceeded, but there is no firm commitment that administrative controls will ensure that 4% hydrogen will not be exceeded). Also there is no commitment to ensure that the type of resin or the contents of the resin will be such that the assumed G-value will not be exceeded or that there will not be materials added that could create the possible generation of gases by biological or chemical processes.

Assuming that the review of the calculations do not result in additional questions/problems (which we won’t know until we look at the calculations), appropriately resolving the above items will resolve this issue.

**Paul Kallan**

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