

Vogle PEmails

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Subject: DRAFT RAI for LAR 17-017, Containment Air Filtration Exhaust Rooms West Walls Removal, on removable shielding
Attachments: RAI for LAR 17-017 (Containment Air Filtration Exhaust Rooms West Walls Removal) on removable shielding.docx

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Draft Request for Additional Information (RAI) on LAR 17-017,
“Containment Air Filtration Exhaust Rooms West Walls Removal”
regarding Removable Shielding

10 CFR 52.47(a)(5) requires applicants to identify the kinds and quantities of radioactive materials expected to be produced in the operation and the means for controlling and limiting radiation exposures.

10 CFR 20.1101(b) requires that licensees 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 (ALARA).

10 CFR Part 50, Appendix A, General Design Criterion (GDC) 61, requires in part that systems that may contain radioactivity shall be designed with suitable shielding for radiation protection.

In LAR 17-017, the licensee proposes to remove labyrinth shield walls on the west side of the containment air filtration exhaust rooms A and B in the Annex building. The licensee indicates in the LAR that the removal of the walls is necessary to allow skid mounted maintenance equipment to navigate through the area. In addition, the licensee indicates that the removal of the walls is consistent with the requirement to maintain doses ALARA because if the walls were retained custom built equipment would be required or workers would be required to disassemble the equipment to get it inside and outside of the rooms. These options would increase cost or dose. However, the LAR does not discuss the option of using removable shielding in place of the permanent shield walls. Regulatory Guide (RG) 8.8 specifies that shielding that can be quickly removed and reinstalled can be used as part of the effort to maintain occupational radiation exposures ALARA.

Therefore, consistent with RG 8.8, the staff requests that the applicant provide additional information regarding if removable shielding is being considered in place of the permanent shield walls that are requested to be removed. If removable shielding is not going to be used, please discuss why it is not necessary. Update the UFSAR to include removable shielding or describe why it was not needed.