

September 24, 2007

MEMORANDUM TO: Timothy Frye, Chief
Health Physics Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors

FROM: Sara Bernal, General Engineer – NSPDP */RA/*
Health Physics Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors

SUBJECT: SUMMARY OF AUGUST 30, 2007, CATEGORY 2 PUBLIC MEETING
WITH THE NUCLEAR ENERGY INSTITUTE TO DISCUSS HEALTH
PHYSICS ISSUES FOR NEW REACTORS

On August 30, 2007, the Nuclear Regulatory Commission (NRC) staff met with members of the Nuclear Energy Institute (NEI) to discuss new reactor health physics issues. Enclosure 1 lists the meeting attendees.

A public meeting notice was issued on August 18, 2007, and was posted on the NRC's external (public) web page (Agencywide Document Access Management System (ADAMS) Accession No. ML072270646). The notice included the meeting agenda, which was also available as a handout at the meeting. The discussions included:

- Offsite Dose Calculation Manual (ODCM) and Radwaste Cost Benefit Analysis Template Development
- Implementation of Regulatory Guide 4.15, Revision 2, at Co-Located Sites
- Industry Approach for Addressing 10 CFR 20.1406 in Combined License Applications

NEI representatives presented two draft templates developed for use by Combined Operating License (COL) applicants. They were "NEI 07-11 Generic FSAR Template Guidance for Cost-Benefit Analysis for Radwaste Systems" (ML072430796) and "NEI 07-09, Generic FSAR Template Guidance for ODCM Program Description" (ML072430775). The NRC staff provided feedback to NEI on what was an acceptable level of detail for each template. In response to NRC comments, NEI representatives raised a concern about the possibility of a COL holder wanting to change an operational program description after COL issuance. What regulatory process would the COL holder have to follow in this instance and would such a change require a license amendment? The NRC staff agreed to provide an answer to the question at the next public meeting.

NEI representatives also presented their concerns regarding the implementation plan described in the recently issued Regulatory Guide (RG) 4.15, Revision 2, "Quality Assurance for Radiological Monitoring Programs." NEI concerns included: inconsistent implementation (only new reactor applicants appeared to be restricted from using revision 1 of the Regulatory Guide); no technical basis for the revision (revision 1 is still considered technically adequate to meet regulatory requirements); and the high cost of implementing two different QA programs, or converting an existing reactor, at co-located sites. NEI asked the NRC staff to consider allowing COL applicants to choose which revision of RG 4.15 they would implement. They also asked that the NRC staff provide industry with a final policy position on the implementation of RG 4.15, as soon as possible, so that COL applicants could move forward with their submittals. The NRC staff agreed to provide an answer within the next few weeks. NRC staff also committed to providing industry with a summary of the long-term benefits of using the revised RG 4.15. NEI representatives agreed that this would give industry a better understanding of the benefits of using the revised RG.

NRC staff presented information on the level of detail with which COL applicants would be expected to address the requirements of 10 CFR 20.1406 in their license applications. NRC staff stated that in addition to referring to the recently issued Draft Guide DG 4012, applicants would be expected to provide a general description of plant design and operational program attributes that demonstrate compliance with the regulation. NEI representatives pointed out that industry would be better able to describe the details of their compliance with 20.1406 several years from now, when the detailed plant engineering work would begin. In addition, Industry wished to focus on complying with 20.1406 instead of complying with the "checklist" of items which were currently in DG 4012. Finally, NEI asked that NRC defer 20.1406 reviews until after DG 4012 was adopted in final form, and requested that a workshop be conducted when DG 4012 was finalized.

The public was invited to attend the meeting. Public Meeting Feedback forms were not received.

Enclosure:
List of Attendees
Meeting Handouts

cc w/encl: See next page

NEI representatives also presented their concerns regarding the implementation plan described in the recently issued Regulatory Guide (RG) 4.15, Revision 2, "Quality Assurance for Radiological Monitoring Programs." NEI concerns included: inconsistent implementation (only new reactor applicants would be restricted from using revision 1 of the Regulatory Guide; no technical basis for the revision (revision 1 is still considered technically adequate to meet regulatory requirements); and the high cost of implementing two different QA programs, or converting an existing reactor, at co-located sites. NEI asked the NRC staff to consider allowing COL applicants to choose which revision of RG 4.15 they would implement. They also asked that the NRC staff provide industry with a final policy position on the implementation of RG 4.15, as soon as possible, so that COL applicants could move forward with their submittals. The NRC staff agreed to provide an answer within the next few weeks. NRC staff also committed to providing industry with a summary of the long-term benefits of using the revised RG 4.15. NEI representatives agreed that this would give industry a better understanding of the benefits of using the revised RG.

The NRC staff presented information on the level of detail with which COL applicants would be expected to address the requirements of 10 CFR 20.1406 in their license applications. NRC staff stated that in addition to referring to the recently issued Draft Guide DG-4012, applicants should provide a general description of plant design and operational program attributes which demonstrate compliance with the regulation.

The public was invited to attend the meeting. Public Meeting Feedback forms were not received.

Enclosure:
List of Attendees
Meeting Handouts

cc w/encl: See next page

DISTRIBUTION:

A. Cabbage
W. Reckley
NRO_DCIP_CHPB
RidsOpaMail
RidsRgn2MailCenter

I. Berrios
CHPB r/f
RidsNroDcipChpb
RidsOgcMailCenter
RidsRgn3MailCenter

A. Johnson
RidsAcraAcnwMailCenter
PUBLIC
RidsRgn1MailCenter
RidsRgn4MailCenter

ADAMS Package Accession Number: ML072270656
Meeting Notice Accession Number: ML072270646
Meeting Handout Accession Number: ML072430796
Meeting Handout Accession Number: ML072430775
Meeting Summary Accession Number: ML072620468

OFFICE	NRO/DCIP/CHPB	NRO/DCIP/CHPB (BC)
NAME	SBernal:hpm1	TFrye
DATE	09/21/07	09/24/07

OFFICIAL RECORD COPY

**Public Meeting with the Nuclear Energy Institute (NEI)
Discussion of New Reactor Health physics Issues**

**August 30, 2007
Meeting Attendees**

Name	Organization
Richard Ely	Enercon Services
J. Stewart Bland	Chesapeake Nuclear
Pedro Salas	Areva
William E. Smith	Southern Nuclear
Edward Roach	NRC
Charles Hinson	NRC
Jean Claude Dehmel	NRC
George Cicotte	NRC
Steven Schaffer	NRC
Tim Frye	NRC
Ralph Andersen	NEI
Sara Bernal	NRC
Andrea Johnson	NRC
Milton Rejcek*	STPNOC
Philip Shultz*	SCANA
Ron Shippee*	UNISTAR
Mark Strum*	Areva
Jo Ann Pelczar*	Areva
Gordon Williams*	STPNOC

* By Telephone

ENCLOSURE

Nuclear Energy Institute

Project No. 689

cc:

Mr. Anthony Pietrangelo, Vice President
Regulatory Affairs
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

Mr. H. A. Sepp, Manager
Regulatory and Licensing Engineering
Westinghouse Electric Company
P. O. Box 355
Pittsburgh, PA 15230-0355

Mr. Jack Roe
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

Mr. Charles B. Brinkman
Washington Operations
ABB-Combustion Engineering, Inc.
12300 Twinbrook Parkway, Suite 330
Rockville, MD 20852

Mr. Gary L. Vine, Executive Director
Federal and Industry Activities, Nuclear
Sector
EPRI
2000 L Street, NW, Suite 805
Washington, DC 20036

Mr. Pedro Salas
Regulatory Assurance Manager - Dresden
Exelon Generation Company, LLC
6500 N. Dresden Road
Morris, IL 60450-9765
pedro.salas@areva.com

Ms. Barbara Lewis
Assistant Editor
Platts, Principal Editorial Office
1200 G St., N.W., Suite 1100
Washington, DC 20005

Mr. Gary Welsh
Institute of
Nuclear Power Operations
Suite 100
700 Galleria Parkway, SE
Atlanta, GA 30339-5957

Alexander Marion, Executive Director
Nuclear Operations & Engineering
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708

Mr. James H. Riley, Director
Engineering
Nuclear Energy Institute
Suite 400
1776 I Street, NW
Washington, DC 20006-3708

Ralph Andersen
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, DC 20006-3708
rla@nei.org

J. Stewart Bland
Chesapeake Nuclear
jsbland@chesnuc.com

William E. Smith
Southern Nuclear
x2wesmit@southernco.com

Ronald Shippee
UNISTAR
ronald.shippee@areva.com

Milton Rejcek
STPNOC
mfrejcek@stpegs.com

Richard Ely
Enercon Services
rely@enercon.com

Mark Strum
AREVA
mark.strum@areva.com

Jo Ann Pelczar
AREVA
joann.pelczar@areva.com