

NorthAnnaRAIsPEm Resource

From: Patel, Chandu
Sent: Thursday, August 18, 2011 3:48 PM
To: 'na3raidommailbox@dom.com'
Cc: NorthAnnaRAIsPEm Resource; Weisman, Robert; LaVera, Ronald; Takacs, Michael
Subject: RAI Letter 84, RAI 5906, Section 13.4, North Anna 3 COLA
Attachments: RAI Letter 84 RAI 5906.doc

By letter dated November 26, 2007, Dominion Virginia Power (Dominion) submitted a Combined License Application for North Anna, Unit 3, pursuant to Title 10 of the *Code of Regulations*, Part 52. The U.S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this COLA.

The NRC staff has identified that additional information is needed to continue portions of the review and a Request for Additional Information (RAI), is enclosed. To support the review schedule, Dominion is requested to respond within 30 days of the date of this request. If the RAI response involves changes to the application documentation, Dominion is requested to include the associated revised documentation with the response.

Sincerely,
Chandu Patel
Lead Project Manager for NA3 COLA

Hearing Identifier: NorthAnna3_eRAI
Email Number: 25

Mail Envelope Properties (8C658E9029C91D4D90C6960EF59FC0D63F0EEB997A)

Subject: RAI Letter 84, RAI 5906, Section 13.4, North Anna 3 COLA
Sent Date: 8/18/2011 3:48:04 PM
Received Date: 8/18/2011 3:48:05 PM
From: Patel, Chandu

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Files	Size	Date & Time
MESSAGE	818	8/18/2011 3:48:05 PM
RAI Letter 84 RAI 5906.doc		31954

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received:

RAI Letter No. 84
8/18/2011
North Anna, Unit 3
Dominion
Docket No. 52-017
SRP Section: 13.04 - Operational Programs
Application Section: 13.4

QUESTIONS for Health Physics Branch (CHPB)

Request for Additional Information No. 5906

13.04-1

10 CFR 20.1406 requires licensees to minimize contamination of the facility and the environment. Regulatory Guide 4.21 notes that a conceptual site model and ground water monitoring programs are part of a leakage detection and minimization program. NEI Template 08-08A "Generic FSAR Template Guidance for Life Cycle Minimization of Contamination", a proposed acceptable method of demonstrating compliance with 10 CFR 20.1406, notes that applicants should develop the appropriate site procedures and implement these procedures and programs consistent with applicant's FSAR section 13.4 (prior to Radiation Protection Milestone 3 initial fuel load). However, COL FSAR Section 13.4 does not contain any milestones for the development of a ground water monitoring program.

Please revise and update COL FSAR Section 13.4 to describe the ground water monitoring implementation milestone, or provide an alternate approach and the associated justification.

13.04-2

10 CFR 50.34.f(2)(xxvi) [NUREG 0737 III.D.1.1] requires leakage control and detection for systems outside containment that might contain highly radioactive fluids, and requires applicants to submit a leakage control program, including an initial test program and a schedule for retesting systems. DCD FSAR Tier 2 Chapter 16 (Technical Specifications), subsection 5.5.2, notes the requirement for a leakage minimization program for systems outside containment that might contain highly radioactive fluids.

1. COL FSAR Section 13.4, Table 13.4-201 "Operational Programs Required by NRC and Program Implementation", Items 1 "Inservice Inspection Program", and 2 "Inservice Testing Program" do not reference this section of the FSAR, nor do they reference 10 CFR 50.34.f(2)(xxvi).
2. Table 13.4-201 also includes Item 6, "Preservice Testing Program", which does not appear to list either the FSAR section or the "Program Source", consistent with the initial test requirements stated in 10 CFR 50.34.f(2)(xxvi) and NUREG 0737 III.D.1.1.

Please revise and update COL FSAR Section 13.4, Table 13.4-201 to reference 10 CFR 50.34.f(2)(xxvi) and FSAR sections that describe the Highly Radioactive Fluid Systems Outside Containment monitoring program requirements, or provide an alternate approach and the associated justification.

