

CCNPP3eRAIPEm Resource

From: Arora, Surinder
Sent: Friday, December 20, 2013 6:59 AM
To: 'Infanger, Paul'; 'UNECC3Project@unistarnuclear.com' (UNECC3Project@unistarnuclear.com)
Cc: CCNPP3eRAIPEm Resource; Segala, John; Wilson, Anthony; Miernicki, Michael; Barss, Dan; Swain, Patricia
Subject: CCNPP3 - Final RAI 408 NSIR EP 7297
Attachments: FINAL RAI 408 NSIR EP 7297.docx

Paul,

Attached to this email message is the final RAI No. 408 (eRAI No. 7297) pertaining to Calvert Cliffs Unit 3 FSAR Section 13. 3. This RAI relates to several inconsistencies between Revision 8 of Emergency Plan and previously issued RAI responses and it also addresses some clarification items. . Per request from UniStar, a clarification phone call was held yesterday (December 19, 2013) to discuss the draft questions in the RAI. However, there were no changes made to the draft RAI questions and it was concluded that the RAI can be issued as "final" without any changes.

The schedule that we have established for review of your COL application assumes that your technically complete response to the RAI question or a schedule for providing a complete response must be received within 30 days of the final issuance of the RAI. Please note that if, in lieu of a complete response, you are providing a response schedule, the staff will re-evaluate the completion schedule for the applicable chapter based on the response date provided by you.

Additionally, please make sure to include in your response letter a statement certifying whether or not your response contains any sensitive or proprietary information that needs to be withheld from public disclosure.

Thanks.

SURINDER ARORA, PE
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Request for Additional Information 408 (eRAI 7297)

Issue Date: 12/20/2013
Application Title: Calvert Cliffs Unit 3 - Docket Number 52-016
Operating Company: UniStar
Docket No. 52-016
Review Section: 13.03 - Emergency Planning
Application Section: Part 5

QUESTIONS

13.03-59

Followup to RAI 299, Question 13.03-44:

In a May 19, 2011, response to RAI 299, Question 13.03-44, the applicant provided letters of certification from the State of Delaware, the District of Columbia, and the local counties of St. Mary's, Dorchester, and Calvert County, Maryland. However, these letters of certification were not included in Revision 8 of the CCNPP Unit 3 Emergency Plan. Provide the appropriate letters of certification per the regulations in 10 CFR 52.79(a)(22)(i) or explain why this is not necessary.

13.03-60

Followup to RAI 372, Question 13.03-54:

In a February 28, 2013, response to RAI 372, Question 13.03-54, the applicant revised the emergency plan to reflect the emergency action levels (EALs) developed in accordance with NEI 99-01, Revision 5, and revised license condition 8 in Part 10 of the CCNPP Unit 3 COL application to include State and local government review and approval of the final (complete) EALs to be submitted to the NRC.

The applicant proposes two deviations from NEI 99-01, Revision 5 specifically for (1) Containment Potential Loss Threshold 4.C and (2) Loss of Indication EALs. These specific deviations need to be addressed in the applicable license condition. Please revise the license condition to address these deviations or explain why this is not necessary.

13.03-61

Followup to RAI 155, Question 13.03-14(D):

Based on the staff's review of the applicant's prior response to RAI 155, Question 13.03-14(D) and the information contained in Revision 8 of the CCNPP Unit 3 Emergency Plan, the staff has determined the applicant did not maintain these changes in Revision 8 of the CCNPP Unit 3 Emergency Plan as committed to in the RAI responses and as changed in Revision 7 of the CCNPP Unit 3 Emergency Plan. Specifically,

In a November 19, 2009, response to RAI 155, Question 13.03-14(D), the applicant committed to revise the CCNPP Unit 3 Emergency Plan to address the 24/7 availability of National Weather Service (NWS) information for the Calvert Cliffs area.

Please revise the CCNPP Unit 3 Emergency Plan to include the previously submitted information that was reviewed and found acceptable, or explain why this is not necessary.

13.03-62

Followup to RAI 155, Question 13.03-15(E):

Based on the staff's review of the applicant's prior response to RAI 155, Question 13.03-15(E) and the information contained in Revision 8 of the CCNPP Unit 3 Emergency Plan, the staff has determined that the applicant did not provide these changes in Revision 8 of the CCNPP Unit 3 Emergency Plan as committed to in the RAI response and as changed in Revision 7 of the CCNPP Unit 3 Emergency Plan. Specifically,

In a November 19, 2009, response to RAI 155, Question 13.03-15(E), the applicant committed to revise the CCNPP Unit 3 Emergency Plan to explicitly acknowledge that areas recommended to be evacuated are retained when new PARs are issued for wind shifts.

Please revise the CCNPP Unit 3 Emergency Plan to include the previously submitted information that was reviewed and found acceptable, or explain why this is not necessary.

13.03-63

In the Table of Contents to Revision 8 of the CCNPP Unit 3 Emergency Plan, dated March 2013, and received by NRC on May 13, 2013, Annex 1, "Calvert Cliffs Nuclear Power Plant Unit 3 EAL Technical Bases Manual" is identified, but not included as an annex to the document. Please clarify if this document was intended to be submitted with Revision 8 of the CCNPP Unit 3 Emergency Plan and provide the document.

13.03-64

Table B-1b, "Minimum Staffing Requirements for the CCNPP Unit 3 ERO" in Revision 8 of the CCNPP Unit 3 Emergency Plan includes an asterisk (*) by the column labelled, "**75 Minute Augmentation;" however, the asterisk is not defined in the footnotes to the table. Please revise this table to provide the definition of the asterisk.

13.03-65

Section H.1.d in Revision 8 of the CCNPP Unit 3 Emergency Plan describes the establishment of an alternative mustering facility in the event of a hostile action at the site. According to the final EP rule and guidance in NSIR/DPR-ISG-01, Section IV.D, alternative facilities should have the capability to perform offsite notifications of a plant emergency. Does the alternate mustering facility have the capability to perform offsite notifications in the event of an emergency as required by Appendix E to 10 CFR Part 50, Section IV.E.8.d and in accordance with the guidance in NSIR/DPR-ISG-01, Section IV.D.2?

13.03-66

The Evacuation Time Estimate for CCNPP Unit 3, dated March 2011 and included as Annex 3 in Revision 8 of the CCNPP Unit 3 Emergency Plan, considered 14 evacuation regions and 14 evacuation scenarios. The Evacuation Time Estimate for CCNPP Units 1 and 2, dated November 2012, considered 17 evacuation regions and 15 evacuation scenarios. It is understood that the emergency plans for Units 1 and 2 are dynamic in nature and may change over time, prior to the construction of Unit 3. Explain what actions are planned to ensure a consistent planning basis is used for all units at the site once the emergency preparedness program for Unit 3 is established.