

ArevaEPRDCDocsPEm Resource

From: Wunder, George
Sent: Tuesday, March 18, 2014 4:28 PM
To: ArevaEPRDCDocsPEm Resource
Subject: FW: Talking Points for Monday Discussion - FSAR Chapter 2, Table 2.1-2

Importance: High

From: HONMA George (EXTERNAL AREVA) [<mailto:George.Honma.ext@areva.com>]
Sent: Tuesday, March 18, 2014 4:06 PM
To: Clark, Phyllis
Cc: Wunder, George; GUCWA Len (EXTERNAL AREVA); HOTTLE Nathan (AREVA); RINCKEL Mark (AREVA); MCFARLAND Mitch (AREVA); RANSOM Jim (AREVA); SEALS Jeff (AREVA); RYAN Tom (AREVA)
Subject: RE: Talking Points for Monday Discussion - FSAR Chapter 2, Table 2.1-2
Importance: High

Hi Phyllis,

I wanted to check with you to see if you had heard back from the reviewers today regarding our position on Table 2.1-2. Also, what the course of action should be to address this issue (i.e., whether a call is still needed or position as denoted below is acceptable without a call).

Thanks for your support,
George Honma
EPR Licensing
(360) 981-0640

From: HONMA George (EXT)
Sent: Friday, March 14, 2014 2:15 PM
To: phyllis.clark@nrc.gov
Cc: George.Wunder@nrc.gov; GUCWA Len (External AREVA INC); HOTTLE Nathan (EP/PE); RINCKEL Mark (RS/IB); MCFARLAND Mitch (EP/PE); RANSOM Jim (RS/NB); SEALS Jeff (EP/PE); HONMA George (EXT)
Subject: Talking Points for Monday Discussion - FSAR Chapter 2, Table 2.1-2
Importance: High

Hi Phyllis,

Below provides our talking points for Monday discussion. Also, can you advise how FSAR Chapter 2, Table 2.1-2 is being (or will be) discussed in the Chapter 2 SER?.

Thanks,
George Honma
EPR Licensing
(360) 981-0640

NRC Comment:

With respect to the radionuclides and inventories listed in FSAR Table 2.1-2 (Bounding Values for Component Radionuclide Inventory), the staff asked AREVA, once it completes its response to RAI 554, Question 11.02-27, to confirm that the listed data set is still representative and bounding. If needed, AREVA should revise the listing in FSAR Table 2.1-2 using data presented in the next revision of FSAR Sections 12.2 and 11.2.3.7 and Table 11.2-8. In addition, AREVA's preliminary assessment on the impact to Chapter 2 (Table 2.1-2) will be needed prior to the completion of their response to RAI 554, Question 11.02-27. AREVA will inform the staff at the March 17th Group A public meeting of any potential impacts to Chapter 2.

AREVA Talking Points:

- Inventories (concentrations) for radionuclides cited in FSAR Tier 2 Table 2.1-2 are conservative and bounding, and are not impacted by the response to RAI 554, Question 11.02-27 (Supplement 2)
- Table 2.1-2 includes the radionuclides that could potentially seep into the groundwater and are consistent with the radionuclides listed in Attachment A of DC/COL-ISG 013, Assessing the Radiological Consequences of Accidental Releases of Radioactive Materials from Liquid Waste Tanks for Combined License Applications.
- The radionuclides and associated concentrations listed in Table 2.1-2 represent the RCS design basis source terms (used for shielding design, with 0.25% failed fuel) reported in FSAR Tier 2 Table 11.1-2, Columns 1 and 2. (Note that NUREG-0800, SRP 11.2 and BTP 11-6 allow liquid tank failure evaluations to assume 0.12% fuel failure.)
- FSAR Tier 2 Table 2.1-2 represents conservatism in the site design envelope:
 - FSAR Tier 2 Section 2.0 indicates "U.S. EPR standard design is based on a set of conservatively established site parameters. These site parameters represent more demanding site conditions than normally expected for most U.S. nuclear power plant sites. These site-related design basis parameters are provided in Table 2.1-1—U.S. EPR Site Design Envelope."
 - Radionuclides and bounding inventories in Table 2.1-2 are a subset of Reactor Coolant System (RCS) Design Basis Source Term, FSAR Table 11.1-2 (used for shielding design).
 - Based on RCS activity concentration with 0.25% defective fuel, with noble gasses and halogens at Technical Specification limits and activation products per ANSI/ANS-18.1-1999.
 - Maximum concentration without radioactive decay.
 - Radionuclides and bounding inventories in Table 2.1-2 are the same as those listed in FSAR Table 11.2-14, which provide the conservative reactor coolant storage tank activity concentration for liquid tank failure evaluation.
- As described in FSAR Tier 2 Section 2.4.13, COL applicants that reference the U.S. EPR design certification will provide site-specific information on the ability of the groundwater and

surface water environment to delay, disperse, dilute, or concentrate accidental radioactive liquid effluent releases.

- No changes to U.S. EPR Design Certification, FSAR Tier 2 Chapter 2, Table 2.1-2 are required since the inventories of current radionuclides in Table 2.1-2 are conservative, bounding and provide the source term for Chap 11 analyses. No changes are anticipated based on future source term clarifications in Chapters 11 or 12.

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