

## KHNPDCDRAIsPEm Resource

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**From:** Ciocco, Jeff  
**Sent:** Monday, September 14, 2015 7:40 AM  
**To:** apr1400rai@khnp.co.kr; KHNPDCDRAIsPEm Resource; Harry (Hyun Seung) Chang; Andy Jiyong Oh; Christopher Tyree  
**Cc:** Stutzcage, Edward; McCoppin, Michael; Olson, Bruce; Lee, Samuel  
**Subject:** APR1400 Design Certification Application RAI 213-8222 (12.01 - Assuring that Occupational Radiation Exposures Are As Low as is Reasonably Achievable)  
**Attachments:** image001.jpg; APR1400 DC RAI 213 RPAC 8222.pdf

KHNP,

The attachment contains the subject request for additional information (RAI). This RAI was sent to you in draft form. Your licensing review schedule assumes technically correct and complete responses within 30 days of receipt of RAIs. We may adjust the schedule accordingly.

Please submit your RAI response to the NRC Document Control Desk.

Thank you,

Jeff Ciocco  
New Nuclear Reactor Licensing  
301.415.6391  
[jeff.ciocco@nrc.gov](mailto:jeff.ciocco@nrc.gov)



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**From:** Ciocco, Jeff

**Created By:** Jeff.Ciocco@nrc.gov

**Recipients:**

"Stutzcage, Edward" <Edward.Stutzcage@nrc.gov>  
Tracking Status: None  
"McCoppin, Michael" <Michael.McCoppin@nrc.gov>  
Tracking Status: None  
"Olson, Bruce" <Bruce.Olson@nrc.gov>  
Tracking Status: None  
"Lee, Samuel" <Samuel.Lee@nrc.gov>  
Tracking Status: None  
"apr1400rai@khnp.co.kr" <apr1400rai@khnp.co.kr>  
Tracking Status: None  
"KHNPDCDRAIsPEm Resource" <KHNPDCDRAIsPEm.Resource@nrc.gov>  
Tracking Status: None  
"Harry (Hyun Seung) Chang" <hyunseung.chang@gmail.com>  
Tracking Status: None  
"Andy Jiyong Oh" <jiyong.oh5@gmail.com>  
Tracking Status: None  
"Christopher Tyree" <Christopher.tyree@aeacom.com>  
Tracking Status: None

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## REQUEST FOR ADDITIONAL INFORMATION 213-8222

Issue Date: 09/14/2015

Application Title: APR1400 Design Certification Review – 52-046

Operating Company: Korea Hydro & Nuclear Power Co. Ltd.

Docket No. 52-046

Review Section: 12.01 - Assuring that Occupational Radiation Exposures Are As Low as is Reasonably Achievable

Application Section: 12.1

### QUESTIONS

12.01-1

10 CFR 20.1101(a) requires that each licensee develop, document, and implement a radiation protection program commensurate with the scope and extent sufficient to ensure compliance with 10 CFR Part 20.

10 CFR 20.1101(b) requires that each licensee 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).

In FSAR Sections 12.1 and 12.5, the applicant indicates that the COL applicant will provide the radiation protection program. While it is acceptable for the COL applicant to provide this information, COL 12.1(2) only specifies that the program will ensure that occupational exposure will be ALARA and none of the other COL Information Items in 12.1 or 12.5 are clear on if the radiation protection program will ensure that public radiation exposure is ALARA.

In addition, NEI 07-03A, "Generic FSAR Template Guidance for Radiation Protection Program Description" discusses how the radiation protection program will also ensure that doses to members of the public are ALARA. NEI 07-03A is approved by the NRC staff.

Therefore, please update the COL information items in FSAR Section 12.1 and/or 12.5, as appropriate, to clarify that in addition to ensuring the occupational exposure will be ALARA, the radiation protection program described by the applicant will also ensure that public exposure will be ALARA.