



Palo Verde Nuclear Generating Station Request for Use of MURUROA V4F1 and MTH2 Supplied Air Suits

Pre-Submittal Meeting with the NRC
March 1, 2023



Agenda

- Introductions
- Issue Description
- Proposed Application Options
- Precedents
- Submittal Timeline



Issue Description

- 10 CFR 20.1703(b), states:

*If the licensee wishes to use equipment that has not been tested or certified by NIOSH, or for which there is no schedule for testing or certification, **the licensee shall submit an application to the NRC for authorized use of this equipment** except as provided in this part. The application must include evidence that the material and performance characteristics of the equipment are capable of providing the proposed degree of protection under anticipated conditions of use. This must be demonstrated either by licensee testing or on the **basis of reliable test information**.*

- APS requests authorization for use of the MURUROA supplied air suits, Models MTH2 and V4F1, which have not been tested or certified by the National Institute for Occupational Safety and Health (NIOSH).

- 10 CFR 20.1705, states:

The licensee shall obtain authorization from the Commission before using assigned protection factors in excess of those specified in Appendix A to Part 20.

- APS also requests to use an Assigned Protection Factor (APF) of 5,000 associated with the use of the MURUROA MTH2 and V4F1 supplied air suits.



Proposed Application Options

OPTION 1

- Application consistent with guidance document titled "Guidance for Review of Licensee Requests to Use Delta Protection BLU Suit Systems Based on the NRC Approved Topical Report," dated August 18, 2006 (ADAMS Accession No. ML062340554).
- It is recognized that the Topical Report refers to the "BLU" model suit.
- The MURUROA MTH2 and V4F1 suits are specifically identified in the Topical Report, included in the paragraph referencing "a single technical basis and approval that can be referenced by licensees in future approval requests under Section 20.1703(b)."
- The MURUROA MTH2 and V4F1 suits are essentially the same as the MURUROA BLU, with the only difference being the supplied air source. The MURUROA BLU suit uses a Powered Air Purifying Respirator (PAPR) while the MURUROA MTH2 and V4F1 suits supply air from compressed gas cylinders or a compressor through a hose.
- Both MURUROA MTH2 and V4F1 suits have been accepted by the NRC for many licensees over the past 20 years.
- List regulatory commitments required in the guidance document.
- This provides a streamlined approach and is the preferred option.



Proposed Application Options

OPTION 2

- Submittal consistent with applications submitted over the last 20 years for MURUROA MTH2 and V4F1 suits.
 - Both MURUROA MTH2 and V4F1 suits have been accepted by the NRC for many licensees.
- Submittal to include similar supporting documentation provided in previous applications.
- Submittal to include list of regulatory commitments.
 - List of regulatory commitments is also required in the guidance document referenced in Option 1. Using the “streamlined” Option 1 does not exempt us from the same commitments.



Precedents

OPTION 1

- Callaway Plant Unit 1, Request for Authorization for Use of Delta Protection MURUROA BLU Single-Use Suits, dated October 10, 2006 (ML062910238)
- Beaver Valley, Units 1 & 2, Davis-Besse, Unit 1 & Perry, Unit 1, Request for Authorization for Use of Delta Protection MURUROA BLU Single-Use Suits, dated August 2, 2010 (ML102350162)

OPTION 2

- Fermi 2, Request for Use of MURUROA Supplied Air Suits Models MTH2 & V4F1 and the MURUROA BLU Suit Systems, dated February 12, 2015 (ML15043A782)
- Brunswick, Units 1 & 2, Crystal River Unit 3, Shearon Harris Unit 1, H. B. Robinson Unit 2; Application for Authorized Use of Delta Protection MURUROA Single Use, Supplied Air Suits, Models V4 F1 and V4 MTH2, dated May 1, 2006 (ML061320253)
- Constellation Energy Company, LLC, Request for Use of Honeywell MURUROA V4F1 R Supplied Air Suits, dated June 20, 2022 (ML22181A094)



Submittal Timeline

- Submittal planned for March 2023
- Based on precedents, requesting a 6-month NRC review period



Questions