

PMBelCOL PEmails

From: Robert Schaaf
Sent: Friday, June 06, 2008 1:39 PM
To: Mark Melnicoff
Cc: Jay Lee; Lynn Mrowca; Mallecia Hood; Linda Tello; Stacey Imboden; PMBelCOL PEmails
Subject: RE: Tasks Assigned to Me re: BLN Environmental Report Review
Attachments: RAI Environmental Impacts of Accidents.doc

Mark,

I can't offer assistance regarding the RD TACs - are those related to the Lee site? If so, then you should confer with Linda Tello, the environmental PM for that site.

We have draft RAIs from PNNL, see attached. Please coordinate with PNNL's technical lead, Dan Strom, as some of these questions may be resolved by supplemental information being provided by TVA before the RAIs are issued.

We should have scoping comment responses available for review shortly.

As far as the overlap between Phase 1 and Phase 2 dates, there is some overlap in most of the phases, so it is not unusual to see some "later phase" tasks that finish before "earlier phase" tasks begin.

Hope that helps. Please contact Mallecia if you have additional questions.

Bob

From: Mark Melnicoff
Sent: Wednesday, June 04, 2008 2:54 PM
To: Robert Schaaf; Stacey Imboden
Cc: Donald Palmrose; Lynn Mrowca; Jay Lee
Subject: FW: Tasks Assigned to Me re: BLN Environmental Report Review

Robert, Stacey,

I had sent the below e-mail to Mallecia, who is listed as a BLN environmental PM, but had not yet received a reply. Given that due dates for a couple of the items are virtually upon me, I am trying to get a clarification on what is expected before my name winds up on some sort of EPM late report.

Are you able to clarify expectations for me, and/or provide appropriate relief from these due dates?

Thanks.

Mark Melnicoff
Risk&Reliability Engineer
U.S. Nuclear Regulatory Commission
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(301)415-1921

From: Mark Melnicoff
Sent: Monday, June 02, 2008 8:50 AM
To: Mallecia Hood
Subject: Tasks Assigned to Me re: BLN Environmental Report Review

Mallecia,

Although I apparently do not have access to the ER review Project Center on EPM (only the DCD/FSAR review Project Centers), based on prior discussions with Mr Emch and ER PMs, I have been assigned some tasks associated with AP1000 COL ER review project. This was discussed in a meeting back in March or April, and an agreement on specific TACs was arrived at.

Somehow I was able to get to the TAC listings back then, and copied them into a spreadsheet that I keep in one of my folders. Five of them, associated with BLN and WLS, appear to have upcoming due dates; yet I haven't received any inputs or communications on what I should be expecting, or what is expected from me. I copy-pasted them from my spreadsheet below, FYI:

Task ID	TAC_ID	Task Name	Resource Name	SchedD	Work S
1793	RB9342	P1 - NRC Reviews Responses to BLN EIS Scoping Comments (NRC)	Melnicoff	2	6/2
1810	RB9354	P2 - Review BLN EIS RAIs (NRC)	Melnicoff	8	5/2
1811	RB9355	P2 - Resolution of BLN EIS RAIs with Contractor	Melnicoff	1	6/1
1280	RD1665	P2 - Review WLS EIS RAIs (NRC)	Melnicoff	8	5/2
1281	RD1666	P2 - Resolution of WLS EIS RAIs with Contractor	Melnicoff	1	6/6

For starters, I guess I am asking for relief from tasks RB9354, RD1665, and RD1666. I have a due date of June 10 for Chapter 19 of the BLN FSAR - end of Phase 1 - PSER and all RAIs need to be completed (and this is an extended due date). It will take 100% of the time available to me between now and then to complete this.

Secondly, please let me know who I should be getting the information that I will need (contractor review materials), and about when I can expect it.

Also, I am puzzled how some Phase 2 "Finish" dates are scheduled to precede one of the Phase 1 tasks. Please enlighten me on this.

Thanks.

Mark Melnicoff
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Hearing Identifier: Bellefonte_COL_Public_EX
Email Number: 288

Mail Envelope Properties (C4A4C9A16294FB4CBA5A36312D05FFAC0A9AD9462F)

Subject: RE: Tasks Assigned to Me re: BLN Environmental Report Review
Sent Date: 6/6/2008 1:38:59 PM
Received Date: 6/6/2008 1:39:01 PM
From: Robert Schaaf

Created By: Robert.Schaaf@nrc.gov

Recipients:

"Jay Lee" <Jay.Lee@nrc.gov>
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Tracking Status: None
"Mark Melnicoff" <Mark.Melnicoff@nrc.gov>
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Post Office: HQCLSTR02.nrc.gov

Files	Size	Date & Time
MESSAGE	3974	6/6/2008 1:39:01 PM
RAI Environmental Impacts of Accidents.doc		44026

Options

Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received:

RAI Number	Question Summary (RAI)	Full Text (supporting information)
2.7.4.2-1	<p>(a) Provide a completed version of ER Table 2.7-119.</p> <p>(b) Provide revisions of the normal atmospheric dispersion (χ/Q) calculations and incorporate the results into Table 2.7-119 so that it can be reconciled with FSAR Figure 2.1-206.</p>	<p>The GASPAR input data in Table 2.7-119 need to be substantiated according to NUREG-1555, or upper bound assumptions need to be made.</p> <p>Table 2.7-119 appears to be incomplete (e.g., no residences in 13 sectors and yet gardens in most sectors) and hard to reconcile with FSAR Figure 2.1-206.</p>

RAIs
Bellefonte Units 3&4 COL
Radiological/Fuel Cycle/Waste Systems

RAI Number	Question Summary (RAI)	Full Text (supporting information)
5.4.1-1	<p>(a) Provide reanalysis of the maximum individual exposure based on the revised χ/Q values.</p> <p>(b) Provide the input and output decks for the XOQDOQ code.</p> <p>(c) Specify whether XOQDOQ used ground-level or elevated release assumptions, and whether building wake effects were turned on.</p> <p>(d) Provide well-documented data of the locations of every kind of data in Section 5.4.1 (Exposure Pathways) under "Data and Information Needs" that are used in GASPAR, so that the reviewer could verify that the maximally-exposed vegetable garden, milk cow/goat, house, animal for meat, and school is identified by compass sector and distance. Revise Table 5.4-6 to list all necessary GASPAR input data and reference the sources or specify the assumptions behind those data.</p> <p>(e) Update all affected tables in which these data are found or from which these data derive.</p> <p>(f) Provide a copy of the input and output data decks for the PAVAN and GASPAR codes.</p>	<p>The GASPAR input data in Table 5.4-6 need to be substantiated according to NUREG-1555, or upper bound assumptions need to be made.</p> <p>Table 5.4-6 has some, but not all, of the information regarding grazing seasons and fraction of daily intake of cows, meat animals, and milk goats derived from pasture or fresh forage during the grazing season, and conflicts with Table 2.7-119 on distance to nearest residence/house. Table 5.4-6 claims to define "Nearest" as "the location at which the highest radiation dose to an individual from the applicable pathways has been estimated. Locations by all compass directions and distances are not provided because the highest dose location is identified." The source of much of the data in Table 5.4-6 is not given.</p>
5.4.3-1	Provide occupational doses from normal operations.	ESRP 5.4.3 III "(3) Include an estimate of the collective occupational dose using the format of Table 5.4.3-2." Occupational collective doses are not provided.

RAIs
Bellefonte Units 3&4 COL
Environmental Impacts of Accidents

RAI Number	Question Summary (RAI)	Full Text (supporting information)
2.7-2	Provide X/Q computation for routine operations based on the DCD AP-1000 revision 16.	It was noted in the detailed materials that were provided by the applicant that the X/Q computation for routine operations given in the ER is based on the DCD AP-1000 revision 15 rather the DCD AP-1000 revision 16 used in other similar computations. It is requested that the applicant provide the results of an X/Q computation using the PAVAN code for routine operations from the proposed Bellefonte Units 3 and 4 based on the DCD AP1000, revision 16. This information is needed to provide consistency in the other X/Q values that are provided in the Environmental Statement.
7.2-1	What surface water pathways exist for severe accidents in addition the ingestion pathways?	In the severe accident analysis, an expanded discussion of the potential for impacts from the surface water pathways is requested that will address potential pathways in addition to direct water ingestion. For example the local region has an very active sport fishing industry and the potential for impacts from fish ingestion needs to be addressed. The requested discussion should cover any significant such pathways within 50 miles of the site.
7.2-2	What groundwater pathways exist for severe accidents?	In the severe accident analysis, a discussion of the potential for impacts from the groundwater pathway is requested.

RAIs
Bellefonte Units 3&4 COL
Environmental Impacts of Accidents

RAI Number	Question Summary (RAI)	Full Text (supporting information)
3.8-1	<p>The analysis in Section 3.8 incorrectly assumes NRC has approved higher enrichments and burnup levels for advanced reactors and cites NUREG-1437 and NUREG-1555 as basis. A full and detailed analysis of transportation impacts is not provided as required by 10 CFR 51.52(b).</p>	<p>10 CFR 51.52(a) provides reactor and fuel conditions that, if met by the proposed action, allows Applicants to use 10 CFR 51.52 Table S-4 to represent the contribution of fuel and waste transportation to the environmental costs of licensing the reactor. The proposed reactor's fuel parameters exceed the fuel enrichment condition given in 10 CFR 51.52(a)(2) and the burnup level condition given in 10 CFR 51.52(a)(3). Based on these conditions being exceeded, 10 CFR 51.52(b) requires the Applicant to provide a full description and detailed analysis of the environmental effects of transporting fuel and waste to and from the reactor. However, the analysis provided by the Applicant incorrectly assumed that the NRC has approved higher fuel enrichment and burnup levels than the 10 CFR 51.52(a) conditions, citing NUREG-1437 and NUREG-1555 as the basis. It is NRC's position that increases to the 10 CFR 51.52(a) conditions are approved only for existing light water reactors and cannot be used as the initial licensing basis for advanced reactors. Therefore, the Applicant for an advanced reactor is required to provide a full and detailed analysis of the environmental effects of transporting fuel and waste to and from the proposed reactors, as required by 10 CFR 51.52(b). Note that a draft revision to NUREG-1555, available on the NRC website, explicitly addresses this limitation.</p>