

NorthAnnaRAIsPEm Resource

From: David B Evans (Generation - 6) [David.B.Evans@dom.com]
Sent: Thursday, October 23, 2014 2:12 PM
To: Buckberg, Perry
Cc: Regina Borsh (Generation - 6); Joseph Hegner (Generation - 6); Barry Bryant (Generation - 6)
Subject: Clarification on Draft RAIs Received 10/20/14

Hello Perry,

We have evaluated the draft RAIs received on Monday (10/20/14), and are requesting clarification as specified below.

7689: We understand the question, and can provide general information on the pump's use, capabilities, and the requirements that will be factored into the design of the pump. However, we do not have specific details available such as the location of the pump. If that is satisfactory with the NRC, we are prepared to respond to the question.

7691: The details requested in this question are within the scope of the DCD. Our FSAR is consistent with the R-COLA and the DCWG. We feel this RAI is unnecessary and would ask the NRC to please withdraw the question.

7692: The DCD discusses this RG in Table 12.3-18. We are consistent with the R-COLA and the DCWG. We are committed to comply with the RG as described in our COLA, and per this commitment we will consider adding this item. However, we think we should not add this bullet to our FSAR and deviate from the R-COLA. Therefore, we feel this RAI is unnecessary and would ask the NRC to please withdraw the question.

7697: For item 1, this statement is correct. We have provided an analysis in FSAR Section 2.4.13 because of the guidance in BTP 11-6 and SRP 11.2, which we state on FSAR page 2-199 of Revision 8 (see left margin annotation NAPS ESP PC 3.E(3)). We are consistent with the R-COLA and DCWG. For item 2, while BTP 11-6 is not specifically referenced in DCD Section 15.3.16, it is addressed. For item 3, we disagree that DCD Sections 11.2.3.2 and 15.3.16 should not be incorporated by reference because they are still applicable to the NA3 FSAR. Liquid releases are not credible, as stated in the DCD; we are consistent with the R-COLA and the DCWG. For item 4, we do not feel we should change this section because we are consistent with the R-COLA and the DCWG. We feel the issues identified are adequately addressed and no FSAR changes are required, therefore we would ask the NRC to please withdraw the question.

7703: For item 1, we are consistent with the R-COLA. We can provide an explanation in the RAI response on how the table columns were calculated, but we do not feel we should have to add a footnote to the end of the table based on the DCWG approach. For item 2, the intent of Table 12.2-17R is to replace DCD Table 12.2-17, which has the same title. If we changed the name of the table, we would be deviating from the R-COLA and the DCWG. Additionally, FSAR Section 12.2.2.1 states, "Based on the inputs and criteria described above, the annual airborne releases for Unit 3 normal operations and the Unit 3 airborne concentrations at the site boundary are provided in Table 12.2-17R." From this statement, it is clear that the table displays annual concentrations. Therefore, we do not feel this item of the RAI question is necessary and would ask the NRC to please remove it from consideration.

7704: See 7703, Item 1.

7709: The Chapter 12 SER (ML091740254) states, "The applicant stated that two standard calibration sources that exceed 3.7 E+9 Bq (100 millicuries) will be purchased. Details of isotope type, quantity, form, shielding requirements, and use of future contained sources will be available when these required sources are purchased. Because these sources will be controlled by the applicant's Radiation Protection Program, the staff finds this response acceptable and RAI 12.02-7 is closed." As described in the SER, the use of these sources will be later determined as the program is developed. The Fermi Chapter 12 SER also includes this statement, and our table is consistent with R-COLA FSAR Table 12.2-208, which does not list the two sources in the table. Therefore, we feel this RAI is unnecessary and would ask the NRC to please withdraw the question.

Additionally, we determined no clarification is needed for draft RAI **7696**.

Thanks,

Ben Evans

Licensing Engineer - North Anna 3 Project

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