

## NorthAnnaRAIsPEm Resource

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**From:** Buckberg, Perry  
**Sent:** Thursday, October 30, 2014 8:56 AM  
**To:** 'na3raidommailbox@dom.com' (na3raidommailbox@dom.com)  
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**Cc:** NorthAnnaRAIsPEm Resource; Weisman, Robert; Carpentier, Marcia; Hinson, Charles; Williams, Stephen; McCoppin, Michael  
**Subject:** North Anna 3 COLA RAI 137-7683 (13.04 - Operational Programs)  
**Attachments:** NA3 COLA RAI 137 RPAC 7683.pdf

By letter dated November 26, 2007, Dominion Virginia Power (Dominion) submitted a Combined License Application for North Anna, Unit 3, pursuant to Title 10 of the *Code of Regulations*, Part 52. The U.S. Nuclear Regulatory Commission (NRC) staff is performing a detailed review of this COLA.

The NRC staff has identified that additional information is needed to continue portions of the review and a Request for Additional Information (RAI), is enclosed. To support the review schedule, Dominion is requested to respond within 30 days of the date of this request. If the RAI response involves changes to the application documentation, Dominion is requested to include the associated revised documentation with the response.

Thanks,

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U.S. Nuclear Regulatory Commission

Office of New Reactors

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**From:** Buckberg, Perry

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## **Request for Additional Information - 137**

Issue Date: 10/30/2014

Application Title: North Anna, Unit 3 - Docket Number 52-017

Operating Company: Dominion

Docket No. 52-017

Review Section: 13.04 - Operational Programs

Application Section: 13.04

### **QUESTION 13.04-3**

10 CFR 20.1406 requires licensees to minimize contamination of the facility and the environment. Regulatory Guide 4.21 notes that a conceptual site model and ground water monitoring programs are part of a leakage detection and minimization program. NEI Template 08-08A "Generic FSAR Template Guidance for Life Cycle Minimization of Contamination," a proposed acceptable method of demonstrating compliance with 10 CFR 20.1406, notes that applicants should develop the appropriate site procedures and implement these procedures and programs consistent with applicant's FSAR Section 13.4 (prior to Radiation Protection Milestone 3 initial fuel load).

NAPS SUP 11.2-2 (in NA3 COL FSAR Section 11.2.3.2) states that monitoring for leakage is per NEI 08-08A as described in FSAR Section 12.3.1.5.2. NAPS SUP 11.2-2 also states that monitoring is implemented as part of the ground water monitoring program. Item 22 of NA3 COL FSAR Table 13.4-201 is entitled, "Lifecycle Minimization of Contamination." However, COL FSAR Table 13.4-201 does not appear to contain any milestones for the development of a ground water monitoring program.

Please provide your justification for not including the ground water monitoring program in this table.