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RECORD #254

TITLE: HEALTH PHYSICS POSITION: DEFINITION OF UNPLANNED RELEASE

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

February 18, 1992

MEMORANDUM FOR:

James H. Joyner, Chief, EPRBP, DRSS, Region I
William E. Cline, Chief, EPRPB, DRSS, Region II
L. Robert Greger, Chief, RPB, DRSS, Region III
L. Joseph Callan, Director, DRSS, Region IV
Gregory P. Yuhas, Chief, EPRPB, DRSS, Region V

FROM:

LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

SUBJECT: DEFINITION OF UNPLANNED RELEASE

Our November 26, 1992 memorandum presented to you for comment the definition for the term "unplanned release" for inclusion as a Health Physics Position (HPPOS). Comments were received from two of the Regions. These comments have been incorporated into the HPPOS. The changed page is shown with the former verbiage struckout and the replacement verbiage redlined.

If there are any questions, please contact Jack Hayes (504-3167).

LeMoine J. Cunningham, Chief
Radiation Protection Branch
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

Enclosure: As stated

Definition of Unplanned Release

UNPLANNED RELEASE

Definition: The unintended discharge of a volume of liquid or airborne radioactivity to the environment.

Guidance: An unplanned release is the unintended discharge of radioactive material from a source. Typical examples of an unplanned release are the discharge of the contents of the wrong waste gas decay tank or the wrong liquid radwaste release tank. Another example of an unplanned release is the discharge of a source, e. g. turbine building sump, that is designed to divert its contents to the liquid radwaste system for processing on either the detection of activity or a certain level of activity and, instead of being diverted, is discharged offsite. It should be noted that instances as described above are rare.

Clarification: It should be noted that a change in activity level from a release source or the release from a new or different source is not necessarily considered an unplanned release. Consider the following cases.

Case 1: Inadvertent release of the contents of a waste gas decay tank through the plant vent.

The release point is the same as that for other sources and although the source is new, the important fact is that the discharge is unplanned. Therefore, the release would be considered an unplanned release because no discharge of any waste gas decay tank was planned.

Case 2: Inadvertent release of the contents of the wrong waste gas decay tank through the plant vent.

The release point is the same as that for all waste gas decay tanks and although the source is new, the important fact is that the discharge is not the intended one. It is the wrong tank. The release was meant to be the contents of a different tank. Therefore, the release is unplanned.

Case 3: Leakage from various pipes and valves in the Auxiliary Building are released from the plant vent via the Auxiliary Building ventilation system.

The function of the Auxiliary Building Ventilation System is to ventilate areas of the Auxiliary Building. In the course of performing this function, it is designed to handle the leakage associated with various pipes and valves. This would not be considered an unplanned release since the design of the system is to treat the airborne leakage associated with various pipes and valves. Normal expected leakage would not be considered an unplanned release since the system is designed to treat routine leakage from various pipes and valves. However, large leaks due to unexpected valve or pipe failures that resulted in a quantity of release such that a 10 CFR 50.72 or 10 CFR 50.73 report is required, would be considered an unplanned release.

The function of the Auxiliary Building Ventilation System is to ventilate areas of the Auxiliary Building. In the course of performing this function, it is designed to handle the leakage associated with various pipes and valves. This would not be considered an unplanned release since the design of the system is to treat the airborne leakage associated with various pipes and valves. ~~leakage. Has the source changed? No! It is still the leakage associated with the various pipes and valves. Has the quantity of the release changed? Possibly! But quantity plays no role in determining whether a release is planned or unplanned. The key concept is intent. Normal expected leakage would not be considered an unplanned release since the system is designed to treat routine leakage from various pipes and valves. However, large leaks due to unexpected valve or pipe failures that resulted in a quantity of release such that a 10 CFR 50.72 or 10 CFR 50.73 report is required, would be considered an unplanned release.~~

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Original signed by LeMoine J. Cunningham

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Enclosure: As stated

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