ACRSR-1885

April 13, 2000

The Honorable Richard A. Meserve
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Dear Chairman Meserve:

SUBJECT: DRAFT FINAL TECHNICAL STUDY OF SPENT FUEL POOL ACCIDENT RISK AT DECOMMISSIONING NUCLEAR POWER PLANTS

During the 471st meeting of the Advisory Committee on Reactor Safeguards, April 5-7, 2000, we met with representatives of the NRC staff and discussed the subject document. We also had the benefit of the documents referenced, which include the available stakeholders comments. This report is in response to the Commission's request in the Staff Requirements Memorandum dated December 21, 1999, that the ACRS perform a technical review of the validity of the draft study and risk objectives.

BACKGROUND

Decommissioning plants are subject to many of the same regulatory requirements as operating nuclear plants. Because of the expectation that the risk will be lower at decommissioning plants, particularly as time progresses to allow additional decay of fission products, some of these requirements may be inappropriate. Exemptions from the regulations are frequently requested by licensees after a nuclear power plant is permanently shut down. To increase the efficiency and effectiveness of decommissioning regulations, the staff has engaged in rulemaking activities that would reduce the need to routinely process exemptions. The staff has undertaken the technical study and risk analysis discussed here to provide a firm technical basis for rulemaking concerning several exemption issues.

In the draft study the staff has concluded that, provided certain industry decommissioning commitments are implemented at the plants, after one year of decay time the risk associated with spent fuel pool fires is sufficiently low that emergency planning requirements can be significantly reduced. It also concluded that after five years the risk of zirconium fires is negligible even if the fuel is uncovered and that requirements intended to ensure spent fuel cooling can be reduced.

RECOMMENDATIONS

1. The integrated rulemaking on decommissioning should be put on hold until the staff provides technical justification for the proposed acceptance criterion for fuel uncovery frequency. In particular, the staff needs to incorporate the effects of enhanced release of ruthenium under air-oxidation conditions and the impact of the MELCOR Accident

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Consequence Code System (MACCS) code assumptions on plume-related parameters in view of the results of expert elicitation.

2. The technical basis underlying the zirconium-air interactions and the criteria for ignition needs to be strengthened. In particular, the potential impact of zirconium-hydrides in high burnup fuel and the susceptibility of the clad to breakaway oxidation need to be addressed.

3. Uncertainties in the risk assessment need to be quantified and made part of the decisionmaking process.

DISCUSSION

The staff's conclusion that the risk after one year of decay time is sufficiently low that emergency planning requirements can be reduced is based partially on the assessed value of fuel uncovery frequency (3.4×10^{-6}/yr) being less than the Regulatory Guide 1.174 large, early release frequency (LERF) acceptance value (1×10^{-5}/yr). This LERF risk-acceptance value was derived to be a surrogate for the Safety Goal early fatality quantitative health objectives (QHO) *for operating reactors.* The derivation from the QHO is based, however, on the fission product releases that occur under severe accident conditions which are driven by steam oxidation of the zircaloy and the fuel. These releases include only insignificant amounts of ruthenium. Under air-oxidation conditions of spent fuel fires, significant data indicate much enhanced releases of ruthenium as the very volatile oxide. Indications are that, under air oxidation conditions, the release fractions of ruthenium may be equivalent to those for iodine and cesium. In the accident at Chernobyl significant releases of ruthenium were observed and attributed to the interactions of fuel with air.

These findings have significant implications. The ruthenium inventory in spent fuel is substantial. Ruthenium has a biological effectiveness equivalent to that of Iodine-131 and has a relatively long half-life. If there are significant releases of ruthenium, the Regulatory Guide 1.174 LERF value may not be an appropriate surrogate for the prompt fatality QHO. In addition, because of the relatively long half-life of ruthenium-106, it is likely that the early fatality QHO would no longer be the controlling consequence.

In response to our concerns about the effects of substantial ruthenium release, the staff has made additional MACCS calculations in which it assumed 100 percent release of the ruthenium inventory. For a one-year decay time with no evacuation, the prompt fatalities increased by two orders of magnitude over those in the report which did not include ruthenium release, the societal dose doubled and the cancer fatalities increased four-fold.

Our concern is not just with ruthenium. We are concerned with the appropriateness of the entire source term used in the study. There is a known tendency for uranium dioxide in air to decrepitate into fine particles. The decrepitation is caused by lattice strains produced as the dioxide reacts to form U_3O_8. This decrepitation is a bane of thermogravimetric studies of air oxidation of uranium dioxide since it can cause fine particles to be entrained in the flowing air of the apparatus. This suggests that decrepitating fuel would be readily entrained in vigorous natural convection flows produced in an accident at a spent fuel pool. The decrepitation process provides a low-temperature, mechanical, release mechanism for even very refractory

radionuclides. The staff did consider the possibility that "fuel fines" could be released from fuel with ruptured cladding. It did not, however, believe these fuel fines could escape the plant site. Nevertheless, the staff considered the effect of a $6x10^{-6}$ release fraction of fines. This minuscule release fraction did not significantly affect the calculated findings. There is no reason to think that such a low release fraction would be encountered with decrepitating fuel.

Consequences of accidents involving a spent fuel pool were analyzed using the MACCS code. The staff has completed an expert opinion elicitation regarding the uncertainties associated with many of the critical features of the MACCS code. The findings of this elicitation seem not to have been considered in the analyses of the spent fuel pool accident. One of the uncertainties in MACCS identified by the experts is associated with the spread of the radioactive plume from a power plant site. The spread expected by the experts is much larger than what is taken as the default spread in the MACCS calculations. There is no indication that the staff took this finding into account in preparing the consequence analyses. In addition, the initial plume energy assumed in the MACCS calculations, which determines the extent of plume rise, was taken to be the same as that of a reactor accident rather than one appropriate for a zirconium fire. We suspect, therefore, that the consequences found by the staff tend to overestimate prompt fatalities and underestimate land contamination and latent fatalities just because of the narrow plume used in the MACCS calculations and the assumed default plume energy.

The staff needs to review the air oxidation fission products release data from Oak Ridge National Laboratory and from Canada that found large releases of cesium, tellurium, and ruthenium at temperatures lower than 1000 ^{0}C. Based on these release values for ruthenium, and incorporating uncertainties in the MACCS plume dispersal models, the consequence analyses should be redone.

Based on the results of this reevaluation of the consequences, the staff should determine an appropriate LERF for spent fuel fires that properly reflects the prompt fatality QHO and the potential for land contamination and latent fatalities associated with spent fuel pool fires.

In developing risk-acceptance criteria associated with spent fuel fires, the staff should also keep in mind such factors as the relatively small number of decommissioning plants to be expected at any given time and the short time at which they are vulnerable to a spent fuel pool fire.

We also have difficulties with the analysis performed to determine the time at which the risk of zirconium fires becomes negligible. In previous interactions with the staff on this study, we indicated that there were issues associated with the formation of zirconium-hydride precipitates in the cladding of fuel especially when that fuel has been taken to high burnups. Many metal hydrides are spontaneously combustible in air. Spontaneous combustion of zirconium-hydrides would render moot the issue of "ignition" temperature that is the focus of the staff analysis of air interactions with exposed cladding. The staff has neglected the issue of hydrides and suggested that uncertainties in the critical decay heat times and the critical temperatures can be found by sensitivity analyses. Sensitivity analyses with models lacking essential physics and chemistry would be of little use in determining the real uncertainties.

The staff analysis of the interaction of air with cladding has relied on relatively geriatric work. Much more is known now about air interactions with cladding. This greater knowledge has come in no small part from studies being performed as part of a cooperative international

program (PHEBUS FP) in which NRC is a partner. Among the findings of this work is that nitrogen from air depleted of oxygen will interact exothermically with zircaloy cladding. The reaction of zirconium with nitrogen is exothermic by about 86,000 calories per mole of zirconium reacted. Because the heat required to raise zirconium from room temperature to melting is only about 18,000 calories per mole, the reaction enthalpy with nitrogen is ample. In air-starved conditions, the reaction of air with zirconium produces a duplex film in which the outer layer is zirconium dioxide (ZrO_2) and the inner layer is the crystallographically different compound zirconium nitride (ZrN). The microscopic strains within this duplex layer can lead to exfoliation of the protective oxide layer and reaction rates that deviate from parabolic rates. These findings may well explain the well-known tendency for zirconium to undergo breakaway oxidation in air whereas no such tendency is encountered in either steam or in pure oxygen. Because of these findings, we do not accept the staff's claim that it has performed "bounding" calculations of the heatup of Zircaloy clad fuel even when it neglects heat losses.

The staff focuses its analysis of the reactions of gases with fuel cladding on a quantity they call an "ignition temperature." The claim is that this is the temperature of self-sustained reaction of gas with the clad. Gases will react with the cladding at all temperatures. In fact, at temperatures well below the "conservative ignition temperature" identified by the staff, air and oxygen will react with the cladding quite smoothly and at rates sufficient to measure. Data in these temperature ranges well below the "ignition" temperature form much of the basis for the correlations of parabolic reaction rates with temperature. We believe that the staff should look for a condition such that the increase with temperature of the heat liberation rate by the reaction of gas with the clad exceeds the increase with temperature of the rate of heat losses by radiation and convection. Finding this condition requires that there be high quality analyses of the heat losses and that the heat of reaction be properly calculated. Since staff has neglected any reaction with nitrogen and did not consider breakaway oxidation (causes for the deviations from parabolic reaction rates), it has not made an appropriate analysis to find this "ignition temperature."

In fact, the search for the ignition temperature may be the wrong criterion for the analysis. The staff should also be looking for the point at which cladding ruptures and fission products can be released. Some fraction of the cladding may be ruptured before any exposure of the fuel to air occurs. Even discounting this, one still arrives at much lower temperature criteria for concern over the possible release of radionuclides.

There are other flaws in the material interactions analyses performed as part of the study. For instance, in examining the effects of aluminum melting, the staff seems to not recognize that there is a very exothermic intermetallic reaction between molten aluminum and stainless steel. Compound formation in the Al-Zr system suggests a strong intermetallic reaction of molten aluminum with fuel cladding as well. The staff focuses on eutectic formations when, in fact, intermetallic reactions are more germane to the issues at hand.

We are concerned about the conservative treatment of seismic issues. Risk-informed decisionmaking regarding the spent fuel pool fire issues should use realistic analysis, including an uncertainty assessment.

Because the accident analysis is dominated by sequences involving human errors and seismic events which involve large uncertainties, the absence of an uncertainty analysis of the

frequencies of accidents is unacceptable. The study is inadequate until there is a defensible uncertainty analysis.

The risk posed by fuel uncovery in spent fuel pools for decommissioning plants may indeed be low, however, the technical shortcomings of this study are significant and sufficient for us to recommend that rulemaking be put on hold until the inadequacies discussed herein are addressed by the staff.

Sincerely

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Dana A. Powers
Chairman

References:

1. Draft For Comment, Draft Final Technical Study of Spent Fuel Pool Accident Risk at Decommissioning Nuclear Power Plants," February 2000.
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3. Memorandum dated December 21, 1999, from Anette L. Vietti-Cook, Secretary of the Commission, to William D. Travers, Executive Director for Operations, NRC, Subject: Staff Requirements -SECY-99-168 - Improving Decommissioning Regulations for Nuclear Power Plants.
4. Letter dated November 12, 1999, from Dana A. Powers, Chairman, ACRS, to William D. Travers, Executive Director for Operations, NRC, Subject: Spent Fuel Fires Associated With Decommissioning.
5. Letter dated December 16, 1999, from William D. Travers, Executive Director for Operations, NRC, to Dana A. Powers, Chairman, ACRS, Subject: Spent Fuel Fires Associated With Decommissioning.
6. E-mail message dated April 5, 2000, from Alan Nelson, Nuclear Energy Institute, to M. El-Zeftawy, ACRS, transmitting NEI comments on Appendix 2.b, "Structural Integrity Seismic Loads."
7. U. S. Nuclear Regulatory Commission, NUREG/CR-6613, "Code Manual for MACCS2, May 1998.
8. U. S. Department of Commerce, "JANAF Thermochemical Tables," Second Edition, Issued June 1971.
9. U. S. Nuclear Regulatory Commission, NUREG/CP-0149, Vol. 2 "Twenty-Third Water Reactor Safety Information Meeting," October 23-25, 1995, "The Severe Accident Research Programme PHEBUS FP.: First Results and Future Tests," published March 1996.
10. U. S. Nuclear Regulatory Commission, NUREG/CR-6244, Vol. 1, "Probabilistic Accident Consequence Uncertainty Analysis," Dispersion and Deposition Uncertainty Assessment, published January 1995.
11. U. S. Nuclear Regulatory Commission, Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to

the Licensing Basis," July 1998.