

# **Technical Working Group Mission Statement**

The Technical Working Group will review and evaluate available technical information and methods to use as an interim risk-informed, technical basis for reviewing exemption requests and rulemaking related to EP safeguards, indemnification, and other areas. This activity may also identify the need for follow up research or activities to address areas of large uncertainty.

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# Working Group Technical Basis Outline

- I. Introduction
- II. Spent Fuel Pool (SFP) Accident Scenarios
  - A. Identification of initiating events that could lead to spent fuel uncoverly (Including qualitative screening of events that are not risk significant)
    - 1. Internal events (e.g., LOSP, loss of UHS, loss of CCW/SW, loss of coolant flow, fire, etc.)
    - 2. External events (e.g., seismic, tornado/high winds, aircraft impact)
    - 3. Errors of commission (e.g., heavy load drop, maintenance errors leading to draining of pool, etc.)
  - B. Identification of available systems for the mitigation of the initiating event (plant configuration, system alignment, backup systems available, etc.)
  - C. Identification of potential operator recovery actions (availability of alarms, instrumentation, procedures, staffing, etc.)
  - D. Formulation of accident sequences
    - 1. Success criteria (timing, system flow rates, etc.)
    - 2. Accident sequence progression using event trees
    - 3. System modeling and recovery actions using fault trees
  - E. Description of the initiating events under Section II.A.
- III. Quantification of Accident Frequency
  - A. Estimate frequency of initiating events that could lead to spent fuel uncoverly (For each event identified, but not qualitatively screen out it item II.A.)
    - 1. Existing data (e.g., for LOSP)
    - 2. Literature search (e.g., site specific hazard curves, load drops, aircraft impact, tornados)
    - 3. Seismic hazard curves for Susquehanna & Pilgrim in III.A.2.
    - 4. Fault tree analysis for loss of support system initiating events
    - 5. HRA for errors of commission
  - B. Estimate equipment failure probability for active and passive components/systems. Estimate availability of backup systems.
    - 1. Information from plant walkdowns
    - 2. AEOD data
    - 3. Information from literature search
  - C. Perform a human reliability analysis to estimate error probabilities for recovery actions.
  - D. Quantify fault trees and event trees using best estimate data. Discuss quantification uncertainty in a qualitative sense.
- IV. Consequences of SFP accident scenarios
  - A. Inventory discussion on reduction of consequences over time
  - B. Evaluation of release fraction due to a zircaloy fire.
  - C. Evaluation of inventories of each radionuclide.
  - D. Dose assessments for time-dependent offsite consequences for a zircaloy fire [based on Millstone 1, and a fire that covers 3 cores of spent fuel].

1. 30 days with offsite EP and without offsite EP
  2. 90 days with offsite EP and without offsite EP
  3. One year with offsite EP and without offsite EP
- E. Identification of consequences (e.g., early fatalities, cancer fatalities, total population dose)
- F. Consequences of other SFP accident scenarios (e.g., loss of cooling)
- G. Evaluation of existing storage dose assessments to determine if they represent current operating and storage practices and if they are applicable to decommissioned plants.
- V. Overall Risk of SFP accidents at Decommissioned Plants
- A. Risk at 30 days with offsite EP and without offsite EP
  - B. Risk at 90 days with offsite EP and without offsite EP
  - C. Risk at one year with offsite EP and without offsite EP
- VI. Spent Fuel Pool Heatup Analysis Following Loss of Water
- A. Evaluation of the phenomena of a zircaloy fire
    1. Literature search
      - a. NRC documentation on zirc fires
      - b. UM library for zirc & similar metal fire data
      - c. NIST FIREDOC database for zirc & similar metal fire data
      - d. Contact DOE for data & experience w/fuel cladding fires
      - e. Contact foreign entities for experience/research w/zirc fires
    2. Evaluation of whether to model the zircaloy fire (e.g., fire/yr)
  - B. Fuel Failure Criteria
    1. Evaluation of 565 degrees C as an appropriate acceptance criterion for analysis and/or,
    2. Recommendation on an appropriate temperature
  - C. Evaluation of existing spent fuel heat up analyses
    1. Evaluation of GSI-82, SHARP Code, and NUREG-6451
    2. Determine if they represent current operating and storage practices, and if they are applicable to decommissioned plants
  - D. Heatup Calculation Uncertainties and Sensitivities
    1. Evaluation of existing computer codes (e.g., SHARP, etc.)
    2. Determine if they could be used to analyze the heat up of the SFP
  - E. Critical Decay Times for Reaching a Zirc Fire
    1. Perform a 2 year/4 year decay time simulation of a generic BWR using the Fluent Code
    2. Evaluation of the generic decay times associated with SFP configurations
  - F. Evaluation of potential fire protection mitigating controls (e.g., high expansion foam, unattended nozzle, etc.)
- VII. Structural integrity of the SFP structure
- A. Current NRC studies
  - B. Hazards to consider (e.g., seismic, heavy load drops, tornado missiles, safegds)
  - C. Risk Ranking of hazards

- D. Structure failure modes
  - E. Deterministic considerations
  - F. Risk-Informed Performance Goal
- VIII. Potential for criticality
- A. Evaluation of the potential for criticality from accidents
  - B. Evaluation of the potential for criticality from personnel actions in response to an accident
  - C. Evaluation of the worst case criticality scenario (i.e., no boron)
  - D. Evaluation of potential for criticality at older plants
- IX. Effects of other Programs
- A. Maintenance Rule
    - 1. Identification of maintenance rule concepts at decommissioned plants
    - 2. Identification of potential systems, equipment, functions at decommissioned plants
    - 3. Evaluation of what maintenance rule means to decommissioned plant oversight.
  - B. Quality Assurance (QA) Programs
    - 1. Identification of QA concepts at decommissioned plants
    - 2. Identification of potential QA programs at decommissioned plants
    - 3. Evaluation of how QA applies to decommissioned plant oversight.
- X. Comparison of design considerations for Wet-Basin ISFSIs
- A. Defense-in-depth
  - B. Minimum decay time
  - C. Design events
  - D. Controls
- XI. Technical basis for reviewing SFP accidents for exemption requests that can be applied to emergency preparedness, safeguards, and insurance indemnity at decommissioned plants.
- A. Identify risk-informed approach and guidelines
  - B. Recommend any administrative or other controls (e.g., enhanced TSs for level, temperature, etc.), if necessary
- XII. Identify follow up research or other technical support which needs to be performed to address any large uncertainties in the available information.
- A. NRC work (NRR, NMSS, RES or contractors, such as INEL, PNNL, etc.)
  - B. External to the NRC (i.e., NEI, Owner's Groups, etc.)