

August 31, 1995

Mr. Ted C. Feigenbaum
Senior Vice President
and Chief Nuclear Officer
North Atlantic Energy Service Corporation
Post Office Box 300
Seabrook, NH 03874

SUBJECT: AMENDMENT NO. 40 TO FACILITY OPERATING LICENSE NPF-86: CONTAINMENT
BUILDING PENETRATIONS - LICENSE AMENDMENT REQUEST 94-06 (TAC
M91716)

Dear Mr. Feigenbaum:

The Commission has issued the enclosed Amendment No. 40 to Facility Operating License No. NPF-86 for the Seabrook Station, Unit No. 1, in response to your application dated April 16, 1995.

The amendment revises the Appendix A Technical Specifications (TS) relating to containment building penetrations. Specifically, the amendment modifies Limiting Conditions for Operation 3.9.4 to permit both doors of one personnel airlock to be open during core alterations or irradiated fuel movement if certain conditions are met and to add equivalent and alternate penetration closure methods. Surveillance Requirement 4.9.4 is changed to reflect that the penetrations are to be verified to be in the condition required. Bases Section 3/4 9.4 also is revised to reflect the changes described above.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,
Original signed by:
Albert W. De Agazio, Sr. Project Manager Project
Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-443
Serial No. SEA-95-017
Enclosures: 1. Amendment No. 40 to NPF-86
2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

ACRS (4)
PUBLIC JRogge, RGI
PDI-3 Plant DCarter
SVarga
PMcKee
ADeAgazio
SNorris
OGC
GHill (2)
CGrimes

9509060086 950831
PDR ADOCK 05000443
PDR

DOCUMENT NAME: G:\DEAGAZIO\91716.AMD

| | | | | | |
|--------|----------|--------------|----------|----------|---------|
| OFFICE | LA:PDI-3 | PM:PDI-3 | D:PMcKee | OGC | |
| NAME | SNorris | ADeAgazio:bf | PMcKee | | |
| DATE | 08/17/95 | 08/21/95 | 08/21/95 | 08/24/95 | 08/ /95 |

OFFICIAL RECORD COPY

NRC FILE CENTER COPY



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 31, 1995

Mr. Ted C. Feigenbaum
Senior Vice President
and Chief Nuclear Officer
North Atlantic Energy Service Corporation
Post Office Box 300
Seabrook, NH 03874

SUBJECT: AMENDMENT NO. 40 TO FACILITY OPERATING LICENSE NPF-86: CONTAINMENT
BUILDING PENETRATIONS - LICENSE AMENDMENT REQUEST 94-06 (TAC M91716)

Dear Mr. Feigenbaum:

The Commission has issued the enclosed Amendment No. 40 to Facility Operating License No. NPF-86 for the Seabrook Station, Unit No. 1, in response to your application dated April 16, 1995.

The amendment revises the Appendix A Technical Specifications (TS) relating to containment building penetrations. Specifically, the amendment modifies Limiting Conditions for Operation 3.9.4 to permit both doors of one personnel airlock to be open during core alterations or irradiated fuel movement if certain conditions are met and to add equivalent and alternate penetration closure methods. Surveillance Requirement 4.9.4 is changed to reflect that the penetrations are to be verified to be in the condition required. Bases Section 3/4 9.4 also is revised to reflect the changes described above.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script that reads "Albert W. De Agazio, Sr.".

Albert W. De Agazio, Sr. Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-443
Serial No. SEA-95-017

Enclosures: 1. Amendment No. 40 to NPF-86
2. Safety Evaluation

cc w/encls: See next page

T. Feigenbaum
North Atlantic Energy Service Corporation

Seabrook Station, Unit No. 1

cc:

Lillian M. Cuoco, Esq.
Senior Nuclear Counsel
Northeast Utilities Service Company
P.O. Box 270
Berlin, CT 06037

Office of the Attorney General
One Ashburton Place
20th Floor
Boston, MA 02108

Mr. Peter Brann
Assistant Attorney General
State House, Station #6
Augusta, ME 04333

Board of Selectmen
Town of Amesbury
Town Hall
Amesbury, MA 01913

Resident Inspector
U.S. Nuclear Regulatory Commission
Seabrook Nuclear Power Station
P.O. Box 1149
Seabrook, NH 03874

Mr. Jack Dolan
Federal Emergency Management Agency
Region I
J.W. McCormack P.O. &
Courthouse Building, Room 442
Boston, MA 02109

Jane Spector
Federal Energy Regulatory Commission
825 North Capital Street, N.E.
Room 8105
Washington, DC 20426

Mr. David Rodham, Director
ATTN: James Muckerheide
Massachusetts Civil Defense Agency
400 Worcester Road
P.O. Box 1496
Framingham, MA 01701-0317

Mr. T. L. Harpster
North Atlantic Energy Service
Corporation
P.O. Box 300
Seabrook, NH 03874

Jeffrey Howard, Attorney General
G. Dana Bisbee, Deputy Attorney
General
33 Capitol Street
Concord, NH 03301

Town of Exeter
10 Front Street
Exeter, NH 03823

Mr. R. M. Kacich, Director
Nuclear Planning, Licensing & Budgeting
Northeast Utilities Service Company
P.O. Box 128
Waterford, CT 06385

Mr. George L. Iverson, Director
New Hampshire Office of Emergency
Management
State Office Park South
107 Pleasant Street
Concord, NH 03301

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

NORTH ATLANTIC ENERGY SERVICE CORPORATION, ET AL*

DOCKET NO. 50-443

SEABROOK STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 40
License No. NPF-86

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by North Atlantic Energy Service Corporation, et al. (the licensee), dated April 16, 1995, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

*North Atlantic Energy Service Company (NAESCO) is authorized to act as agent for the: North Atlantic Energy Corporation, Canal Electric Company, The Connecticut Light and Power Company, Great Bay Power Corporation, Hudson Light and Power Department, Massachusetts Municipal Wholesale Electric Company, Montaup Electric Company, New England Power Company, New Hampshire Electric Cooperative, Inc., Taunton Municipal Light Plant, and The United Illuminating Company, and has exclusive responsibility and control over the physical construction, operation, and maintenance of the facility.

9509060090 950831
PDR ADOCK 05000443
P PDR

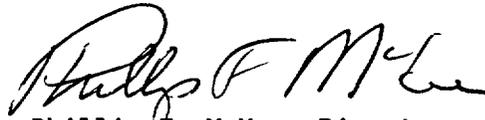
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-86 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 40, and the Environmental Protection Plan contained in Appendix B are incorporated into Facility License No. NPF-86. NAESCO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of its issuance, to be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Phillip F. McKee, Director
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: August 31, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 40

FACILITY OPERATING LICENSE NO. NPF-86

DOCKET NO. 50-443

Replace the following pages of Appendix A, Technical Specifications, with the attached pages as indicated. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change. Overleaf pages have been provided.

Remove

3/4 9-3*

3/4 9-4

B 3/4 9-1

B 3/4 9-2

B 3/4 9-3

Insert

3/4 9-3*

3/4 9-4

3/4 9-1

B 3/4 9-2

B 3/4 9-3

REFUELING OPERATIONS

3/4.9.3 DECAY TIME

LIMITING CONDITION FOR OPERATION

3.9.3 The reactor shall be subcritical for at least 100 hours.

APPLICABILITY: During movement of irradiated fuel in the reactor vessel.

ACTION:

With the reactor subcritical for less than 100 hours, suspend all operations involving movement of irradiated fuel in the reactor vessel.

SURVEILLANCE REQUIREMENTS

4.9.3 The reactor shall be determined to have been subcritical for at least 100 hours by verification of the date and time of subcriticality prior to movement of irradiated fuel in the reactor vessel.

REFUELING OPERATIONS

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

LIMITING CONDITION FOR OPERATION

- 3.9.4 The containment building penetrations shall be in the following status:
- a. The equipment door closed and held in place by a minimum of four bolts,
 - b. A minimum of one door in each airlock is closed, however both doors of one personnel airlock may be open if:
 - 1) One personnel airlock door is capable of being closed, and
 - 2) A designated individual is available outside the personnel airlock to close the door.
 - c. Each penetration providing direct access from the containment atmosphere to the outside atmosphere shall be either:
 - 1) Closed by a manual or automatic isolation valve, blind flange, or equivalent; or
 - 2) Be capable of being closed by an OPERABLE automatic containment purge and exhaust isolation valve; or
 - 3) Be capable of being closed by a designated individual available at the penetration.

APPLICABILITY: During CORE ALTERATIONS or movement of irradiated fuel within the containment.

ACTION:

With the requirements of the above specification not satisfied, immediately suspend all operations involving CORE ALTERATIONS or movement of irradiated fuel in the containment building.

SURVEILLANCE REQUIREMENTS

- 4.9.4 Each of the above required containment building penetrations shall be determined to be either in its required condition or capable of being closed by an OPERABLE automatic containment purge and exhaust isolation valve within 100 hours prior to the start of and at least once per 7 days during CORE ALTERATIONS or movement of irradiated fuel in the containment building by:
- a. Verifying the penetrations are in their required condition, or
 - b. Testing the containment purge and exhaust isolation valves per the applicable portions of Specification 4.6.3.2.

3/4.9 REFUELING OPERATIONS

BASES

3/4.9.1 BORON CONCENTRATION

The limitations on reactivity conditions during REFUELING ensure that: (1) the reactor will remain subcritical during CORE ALTERATIONS and (2) a uniform boron concentration is maintained for reactivity control in the water volume having direct access to the reactor vessel. These limitations are consistent with the initial conditions assumed for the boron dilution incident in the safety analyses. The value of 0.95 or less for k_{eff} includes a 1% $\Delta k/k$ conservative allowance for uncertainties. Similarly, the boron concentration value of 2000 ppm or greater includes a conservative uncertainty allowance of 50 ppm boron.

3/4.9.2 INSTRUMENTATION

The OPERABILITY of the Source Range Neutron Flux Monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core.

3/4.9.3 DECAY TIME

The minimum requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor vessel ensures that sufficient time has elapsed to allow the radioactive decay of the short-lived fission products. This decay time is consistent with the assumptions used in the safety analyses.

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS

The Limiting Condition for Operation (LCO) limits the consequences of a fuel handling accident in containment by limiting the potential escape paths for fission product radioactivity released within containment. The LCO requires any penetration providing direct access from the containment atmosphere to the outside atmosphere to be closed except for the OPERABLE containment purge and exhaust penetrations, the approved alternate closure methods and the containment personnel airlock.

For the approved alternate closure methods, the LCO requires that a designated individual must be available to close or direct the remote closure of the penetration in the event of a fuel handling accident. "Available" means stationed at the penetration or performing activities controlled by a procedure on equipment associated with the penetration.

For the personnel airlocks (containment or equipment hatch), the LCO ensures that the airlock can be closed after containment evacuation in the event of a fuel handling accident. The requirement that the airlock door is capable of being closed requires that the door can be closed and is not blocked by objects that cannot be easily and quickly removed. As an example, the use of removable protective covers for the door seals and sealing surfaces is permitted. The requirement for a designated individual located outside of the airlock area available to close the door following evacuation of the containment will minimize the release of radioactive material.

REFUELING OPERATIONS

BASES

3/4.9.4 CONTAINMENT BUILDING PENETRATIONS (Continued)

The fuel handling accident analysis inside containment assumes both of the personnel airlock doors are open and an additional 12" diameter penetration (or equivalent area) is open. The analysis is bounded by these assumptions since all of the available activity is released within a 2 hour period.

3/4.9.5 COMMUNICATIONS

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity conditions during CORE ALTERATIONS.

3/4.9.6 REFUELING MACHINE

The OPERABILITY requirements for the refueling machine ensure that: (1) refueling machine will be used for movement of drive rods and fuel assemblies, (2) each hoist has sufficient load capacity to lift a drive rod or fuel assembly, and (3) the core internals and reactor vessel are protected from excessive lifting force in the event they are inadvertently engaged during lifting operations.

3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE AREAS

The restriction on movement of loads in excess of the nominal weight of a fuel and control rod assembly and associated handling tool over other fuel assemblies in the storage pool ensures that in the event this load is dropped: (1) the activity release will be limited to that contained in a single fuel assembly and (2) any possible distortion of fuel in the storage racks will not result in a critical array. This assumption is consistent with the activity release assumed in the safety analyses.

3/4.9.8 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

The requirement that at least one residual heat removal (RHR) loop be in operation ensures that: (1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor vessel below 140°F as required during the REFUELING MODE, and (2) sufficient coolant circulation is maintained through the core to minimize the effect of a boron dilution incident and prevent boron stratification.

The requirement to have two RHR loops OPERABLE when there is less than 23 feet of water above the reactor vessel flange ensures that a single failure of the operating RHR loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and at least 23 feet of water above the reactor pressure vessel flange, a large heat sink is available for core cooling. Thus, in the event of a failure of the operating RHR loop, adequate time is provided to initiate emergency procedures to cool the core.

REFUELING OPERATIONS

BASES

3/4.9.9 CONTAINMENT PURGE AND EXHAUST ISOLATION SYSTEM

The OPERABILITY of this system ensures that the containment vent and purge penetrations will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material from the containment atmosphere to the environment.

3/4.9.10 and 3/4.9.11 WATER LEVEL - REACTOR VESSEL and STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gas activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the safety analysis.

3/4.9.12 FUEL STORAGE BUILDING EMERGENCY AIR CLEANING SYSTEM

The limitations on the Fuel Storage Building Emergency Air Cleaning System ensure that all radioactive material released from an irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. Operation of the system with the heaters operating for at least 10 continuous hours in a 31-day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the safety analyses. ANSI N510-1980 will be used as a procedural guide for surveillance testing.

3/4.9.13 SPENT FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the Spent Fuel Pool is dictated by Figure 3.9-1. These restrictions ensure that the K_{eff} of the Spent Fuel Pool will always remain less than 0.95 assuming the pool to be flooded with unborated water. The restrictions delineated in Figure 3.9-1 and the action statement are consistent with the criticality safety analysis performed for the Spent Fuel Pool as documented in the FSAR.

3/4.9.14 NEW FUEL ASSEMBLY STORAGE

Restrictions on placement of fuel assemblies of certain enrichments within the New Fuel Storage Vault is dictated by Specification 3/4.9.14. These restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.95 assuming the area to be flooded with unborated water. In addition, these restrictions ensure that the K_{eff} of the New Fuel Storage Vault will always remain less than 0.98 when aqueous foam moderation is assumed. The restrictions delineated in Specification 3/4.9.14 and the action statement are consistent with the criticality safety analysis performed for the New Fuel Storage Vault as documented in the FSAR.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 40 TO FACILITY OPERATING LICENSE NO. NPF-86
NORTH ATLANTIC ENERGY SERVICE CORPORATION
SEABROOK STATION, UNIT NO. 1
DOCKET NO. 50-443

1.0 INTRODUCTION

By application dated April 16 1995, North Atlantic Energy Service Corporation (North Atlantic) proposed an amendment to the Appendix A Technical Specifications (TS) for the Seabrook Station, Unit 1 (Seabrook). The proposed changes would modify certain requirements of TS 3.9.4 relating to containment building penetrations during refueling operations. One change would allow both doors of one containment building personnel airlock (PAL) to be open during core alterations or movement of irradiated fuel within the containment building provided certain conditions are satisfied. Other changes proposed would allow the use of closure methods equivalent to closed valves or blind flanges and would add an alternate containment building penetration closure method during refueling operations. Additionally, Surveillance Requirement (SR) 4.9.4.a would be modified to be consistent with these changes.

2.0 DISCUSSION

TS 3.9.4 currently requires that a minimum of one door in each containment building PAL be closed and each penetration providing direct access from the containment building atmosphere to the outside atmosphere be isolated or capable of being isolated by an automatic isolation valve. Acceptable isolation devices are closed isolation valves, blind flanges, closed manual valves, or operable automatic isolation valves. These requirements are applicable during refueling operations (Mode 6) whenever core alterations are being performed or there is movement of irradiated fuel within the containment building.

North Atlantic has proposed several changes to TS 3.9.4 as follows:

- TS 3.9.4.b - The requirement that a minimum of one door in each PAL be closed would be changed to allow both doors of one PAL to be open provided one PAL door is capable of being closed and a designated individual is available outside the PAL to close the door,

- TS 3.9.4.c.1 - The requirement would be reworded to provide for the use of closure methods *equivalent* to closed manual or automatic [isolation] valves or blind flanges,
- TS 3.9.4.c.3 - An alternate containment building penetration closure method would be allowed consisting of a designated individual available at the penetration to manually close the penetration, and
- SR 4.9.4.a - The SR would be modified to require verification that the penetrations are in the *required* condition vice *closed/isolated* condition to be consistent with proposed equivalent and alternate closure methods described.

The containment building and associated systems are provided to establish a nearly leaktight barrier against the uncontrolled release of radioactivity to the environment. During operation in Modes 1, 2, 3, or 4, this is accomplished by maintaining Containment Integrity. Containment Integrity assures that all penetrations required to be closed in the event of an accident are closed or are capable of being closed automatically and that containment leakage rates are within specified limits.

Containment Integrity is necessary for operation in Modes 1 through 4 because, in the event of an accident with the reactor coolant system (RCS) above 200°F, the containment building could become pressurized. However, during refueling operations (Mode 6), containment pressurization as a result of an accident is not likely; therefore, the requirements to isolate the containment from the outside atmosphere are less stringent. Thus, in Mode 6 only those penetrations providing direct access from the containment atmosphere to the outside atmosphere are required to be closed or be capable of being closed, and only one door on each PAL is required to be closed. In this condition, all potential direct escape paths are closed or capable of being closed. The closure requirements are sufficient to restrict fission product radioactivity release from containment due to a fuel handling accident.

The PALs provide a means for personnel access without violating containment integrity. Each PAL has doors at both ends. The doors on each PAL normally are interlocked to prevent simultaneous opening when containment closure is required. During periods of unit shutdown when containment closure is not required, the door interlock mechanism may be disabled, allowing both doors of the PAL to remain open for extended periods when frequent containment entry is necessary.

During a refueling outage, work in the containment building continues even during core alterations or movement of irradiated fuel when the current technical specification requires one PAL door to be closed. Thus, personnel entering or leaving the containment building when TS 3.9.4 is applicable must enter the PAL through one door with the other door closed, shut the door just passed, then open the other door. During a refueling outage, North Atlantic estimates that the PAL doors are operated up to several hundred times per day

when containment closure is required. This heavy use of the PAL doors has resulted in failures of door components and seals reducing PAL closure reliability.

Other licensees have experienced similar difficulties with PALs during refueling outages. Florida Power and Light Company (FPL), the licensee for Turkey Point Unit 3 and 4, proposed an amendment on October 20, 1994, which would, in part, allow the PAL doors to remain open during core alterations. The amendment was issued on May 11, 1995, on the basis primarily that calculated offsite dose and control room operator doses were within acceptable limits with the PAL doors open following a fuel handling accident. In support of that proposal, FPL estimated that when the PAL doors were closed during core alterations during the 1994 Turkey Point Unit 3 refueling outage, the PAL doors were cycled over 300 times a day. FPL also asserted that the crowding of personnel in the PAL during shift changes might cause an increase in personnel contaminations. The excessive cycling of the PAL doors required frequent maintenance of the door hinge pin, the door seals, the packing of the equalizing valve, and other components.

The purpose of the current requirement to have at least one PAL door closed is to restrict the escape of radioactive material in the event of a fuel handling accident. In support of the proposed change to TS 3.9.4.b, North Atlantic notes that the current requirement will not prevent all radioactive releases from the containment following a fuel handling accident because there are many workers inside containment during a refueling outage even during fuel movement or core alterations. To evacuate these personnel from containment in the event of a fuel handling accident, the PAL doors would be cycled a number of times. Such cycling would release some radioactive material to the environment. In support of its proposed change to TS 3.9.4.b, North Atlantic provided a fuel handling accident analysis which assumes that the doors of one PAL are not closed at the time of or following the accident. This analysis is discussed further in Section 3.0.

North Atlantic's proposal to revise TS 3.9.4.c.1 to allow the use of closure methods *equivalent* to closed manual or automatic [isolation] valves or blind flanges would be consistent with the requirements of Section 3.9.4 of the Westinghouse Standard Technical Specifications, NUREG-1431 which would allow containment isolation to be achieved by an operable automatic isolation valve, or by a manual isolation valve, blind flange, or equivalent. Equivalent isolation methods must be approved and supported by an engineering evaluation and may include use of a material that can provide an atmospheric pressure and ventilation barrier to restrict release of radioactive material to the environment from the penetration. North Atlantic asserts that this change would improve schedular flexibility for refueling outage activities during periods when containment closure is required.

North Atlantic notes that during a typical refueling outage, there are only short periods of time when the current technical specifications would allow the containment to be open to the environment. Thus, the current TS

requirements also limit the times when certain other refueling outage activities can be performed. North Atlantic provided steam generator sludge lancing as an example of one refueling outage activity that is so limited.

Sludge lancing requires the routing of hoses from equipment located outside containment to a special fixture attached to a spare containment penetration. The fixture provides manual isolation valves and connection points for the sludge lance hoses inside containment. At times when TS 3.9.4 is applicable, sludge lancing must be stopped and the manual isolation valves in the penetration fixture closed. With the proposed change to TS 3.9.4.c.3, sludge lancing could continue. North Atlantic asserts the alternate closure method, consisting of a designated individual available to close the penetration, would ensure that the penetration would be capable of restricting the release of radioactive material to the environment. In support of its proposed change to TS 3.9.4.c.3, North Atlantic provided a fuel handling accident analysis which assumes that the penetration remains open for as long as 2-hours. This analysis is discussed further in Section 3.0.

3.0 EVALUATION

During refueling operations, the most severe radiological consequences result from a fuel handling accident. The fuel handling accident is a postulated event that involves damage to irradiated fuel. Fuel handling accidents include dropping a single irradiated fuel assembly and handling tool or dropping a heavy object onto other irradiated fuel assemblies. The TS requirements associated with refueling are intended to ensure that the release of fission product radioactivity subsequent to a fuel handling accident results in doses that are *well within* the guideline values specified in 10 CFR Part 100. Standard Review Plan (SRP), Section 15.7.4, Rev. 1, defines *well within* 10 CFR Part 100 to be 25% or less of the 10 CFR 100 Part values, i.e., ≤ 75 rem to the thyroid and ≤ 6 rem to the whole body.

Regulatory Guide (RG) 1.25 provides acceptable assumptions that may be used in evaluating the radiological consequences of a fuel handling accident. North Atlantic provided the results of a fuel handling accident assuming several scenarios with respect to the changes proposed to TS 3.9.4.b and 3.9.4.c.3. The limiting scenario is that corresponding to the proposal to permit both doors of one PAL to be open during movement of irradiated fuel or core alterations. For this limiting scenario, North Atlantic's analysis calculated the doses for the 0-2 hour period at the exclusion area boundary to be 62.7 rem to the thyroid and 2.0 rem to the whole body. Control room habitability following a fuel handling accident must also be considered using the dose criteria in Appendix A to 10 CFR Part 50, Criterion 19. North Atlantic analysis results show the 30-day control room doses to be 6.7 rem to the thyroid and 0.29 rem to the whole body. Thus, North Atlantic's calculated doses are within the acceptance criteria of the SRP and Criterion 19.

The staff has completed its evaluation of the potential radiological consequences of a fuel handling accident at Seabrook, based upon the conditions of the proposed TS changes. The staff reviewed North Atlantic's analysis for the limiting scenario; however, it was not relied upon for determining acceptability of the proposed changes. Instead, the staff performed an independent analysis to determine conformance with the acceptance criteria of 10 CFR Part 100 and Criterion 19 of Appendix A to 10 CFR Part 50. The staff's analysis utilized the accident source term given in RG 1.4, the assumptions contained in RG 1.25, and the review procedures specified in SRP Sections 15.7.4 and 6.4. The staff assumed an instantaneous puff release of noble gases and radioiodines from the gap and plenum of the broken fuel rods. These gas bubbles will pass through at least 23 feet of water covering the fuel prior to reaching the containment atmosphere. All airborne activity reaching the containment atmosphere is assumed to exhaust to the environment within 2 hours. As stipulated in the proposed TS change, the gap activity is assumed to have decayed for a period of 100 hours.

The staff computed the offsite doses for Seabrook using the above assumptions and NRC computer code ACTICODE. Control room operator doses were determined using the methodology in SRP Section 6.4. The computed offsite doses and control room operator doses are within the acceptance criteria given in SRP Section 15.7.4 and Criterion 19. The assumptions used in calculating those doses and the resulting calculated values are shown in Tables 1 and 2.

Based upon this independent analysis, the staff concludes that the radiological consequences associated with the limiting fuel handling accident scenario are within the acceptance criteria set forth in 10 CFR Part 100 and the control room operator dose criteria specified in Criterion 19 of Appendix A to 10 CFR Part 50 and are acceptable. Further, the staff finds the proposed changes to the TS acceptable, since the radiological consequences of a fuel handling accident meet the dose acceptance criteria with the proposed changes.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Hampshire and Massachusetts State officials were notified of the proposed issuance of the amendment. The State officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes a surveillance requirement. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 32369). Accordingly, the amendment meets the eligibility criteria for

categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: D. Carter
A. De Agazio

Date: August 31, 1995

TABLE 1
CALCULATED RADIOLOGICAL CONSEQUENCES
(rem)

| <u>Exclusion Area Boundary</u> | <u>Dose</u> | <u>SRP 15.7.4 Guidelines</u> |
|--------------------------------|-------------|------------------------------------|
| Whole Body | 0.28 | 6 |
| Thyroid | 56.9 | 75 |
| | | |
| <u>Control Room Operator</u> | <u>Dose</u> | <u>GDC-19 Guidelines</u> |
| Whole Body | 0.18 | 5 |
| Thyroid | 15.2 | Equivalent to 5 rem whole body* |

* Guideline doses provided in Standard Review Plan Section 6.4 define the dose-equivalent as 30 rem to the thyroid.

TABLE 2

ASSUMPTIONS USED FOR CALCULATING RADIOLOGICAL CONSEQUENCES

| <u>Parameters</u> | <u>Quantity</u> |
|--|-------------------------|
| Power Level, Mwt | 3,654 |
| Number of Fuel Rods Damaged (1 assembly plus 32 rods) | 264 |
| Total Number of Rods | 50,952 |
| Shutdown time, hours | 100 |
| Power Peaking Factor* | 1.65 |
| Fission Product Release Duration* | 2 hours |
| Core Fission Product Inventories per TID-14844 | |
| <u>Receptor Point Variables**</u> | |
| <u>Exclusion Area Boundary</u> | |
| Atmospheric Relative Concentration, X/Q (sec/m ³) 0-2 hours | 2.7 x 10 ⁻⁴ |
| <u>Control Room</u> | |
| Atmospheric Relative Concentration, X/Q (sec/m ³) | 3.18 x 10 ⁻³ |
| Control Room Volume, cubic feet | 2.46 x 10 ⁵ |
| Maximum Infiltration Rate, ft ³ /min | 1200 |
| Geometry Factor | 17.5 |
| Iodine Protection Factor | 44 |
| <u>Recirculation Air Flow</u> | |
| Flow Rate, ft ³ /min | 800 |
| ESF Filter Efficiency | |
| Elemental Iodine | 95% |
| Organic Iodine | 95% |
| Particulate Iodine | 99% |

Note: Dose conversion factors from ICRP-30 were utilized for all calculations

* Regulatory Guide 1.25

** Seabrook SER