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U.S. EPR Final Safety Analysis Report, Supplement 2

Ref. **1:** Letter, Sandra M. Sloan (AREVA NP Inc.) to Document Control Desk (NRC), "Application for Standard Design Certification of the U.S. EPR (Project No. 733)," NRC:07:070, December 11, 2007.

On December 11, 2007, AREVA NP Inc. (AREVA NP) tendered an application for a standard design certification for the U.S. EPR (Reference 1). The application included a Final Safety Analysis Report (FSAR). Since the application was tendered, AREVA NP has identified several areas where information in the FSAR needs to be supplemented to support the NRC's review of the design certification application as well as future combined license applications.

Attachment A provides a summary description of the changes provided in this supplemental information.

Attachment B provides the revised sections in a redline/strikeout format and supplements the FSAR submitted by Reference 1. These pages provide the NRC staff with information to support the U.S. EPR design certification review. Editorial changes may appear on some of the pages. Please note the page numbering may vary from the complete FSAR.

This supplemental information will be included in Revision 1 to the U.S. EPR FSAR.

If you have any questions related to this submittal, please contact Ms. Sandra M. Sloan, Regulatory Affairs Manager for New Plants Deployment. She may be reached by telephone at $434 - 832 - 2369$ or by e-mail at sandra.sloan@areva.com.

Sincerely,

Romie 2, Marduer

Ronnie L. Gardner, Manager Site Operations and Corporate Regulatory Affairs AREVA NP Inc.

Enclosures

cc: J. Rycyna G. Tesfaye Project 733

AREVA **NP INC.** An AREVA and Siemens company

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ATTACHMENT A

DESCRIPTION OF **CHANGES**

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ATTACHMENT B

SUPPLEMENTAL INFORMATION CONTENTS

5.0 SITE PARAMETERS

Assuming the certified design will be referenced for a wide range of sites, it is necessary to specify a set of site parameters enveloping the conditions that could be present at most potential power plant sites in the United States. These parameters are provided in Table **5.0-1.** It is intended that any facility that references the certified design will utilize a site where the actual site-specific conditions are within the defined envelope.

In the case of seismic design parameters, deviations from the defined conditions may be justified **by** site-specific soil-structure interaction analyses. The results may be used to confirm the seismic design adequacy of the certified design using approved methods and acceptance criteria.

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Radius of maximum rotational speed is 150 ft

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1.8 Interfaces with Standard Designs and Early Site Permits

This section addresses the requirements of 10 CFR 52.47(a)(25) and describes the standard plant scope interfaces for the U.S. EPR as they relate to design certification between the standard U.S. EPR plant and the COL applicant. The site-specific items that must be included by a COL applicant that references the U.S. EPR design certification are also provided in this section.

Interface requirements for systems, structures, and components (SSCs) that relate to specific mechanical, electrical, nuclear, or structural systems are covered in the appropriate chapter and identified by a specific COL information item to be addressed by the applicant. A COL applicant that references the U.S. EPR design certification will describe where the interface requirements are satisfied in the COL Final Safety Analysis Report (FSAR) to demonstrate compatibility with the U.S. EPR design. Interface requirements in Tier 1 of the U.S. EPR FSAR will demonstrate that conformance with the interface requirements can be verified with inspections, tests, or analyses and that the method for verification is included in the proposed inspections, tests, analyses, and acceptance criteria (ITAAC), per 10 CFR 52.47(a)(26).

The U.S. EPR design plant consists of the following structures and the SSCs therein:

- **"** Reactor Building.
- Safeguard Buildings.
- Fuel Building.
- **"** Nuclear Auxiliary Building.
- Radioactive Waste Processing Building.
- **Emergency Power Generating Buildings.**
- Ultimate Heat Sink (UHS) Structures.

Site-specific assumptions on which the U.S. EPR standard design is based are presented in Section 1.2.1 and Chapter 2. The physical boundary of the U.S. EPR is provided in the site plan in Section 1.2. A more detailed listing of the systems included in the U.S. EPR standard design is included in Section 3.2.

The representative conceptual designs for the portions of the plant that are not submitted for certification are described in the FSAR to satisfy the requirement of 10 CFR 52.47(a)(24). These conceptual designs are outside the scope of the U.S. EPR standard design, but conceptual design information is provided as discussed below.

* The Access Building, Turbine Building, and the Fire Protection Storage Tanks and Pump Building. Conceptual design information for these structures is included, delineated **by** double brackets ([[]]), in Section 1.2 and Section 3.7.2.

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- **"** The Switchgear Building. Conceptual design information for this structure is included, delineated by double brackets ([[]]), in Section 1.2, Section 8.3, and Section 8.4.
- **"** The auxiliary power and generator transformer areas. Conceptual design information for these components is included, delineated by double brackets ([[]]), in Section 8.2.
- * Buried conduit duct banks, pipe ducts, and piping. Conceptual design information for these components is included, delineated by double brackets $([[\]])$, in Section 3.8.
- * Toxic gas detectors for main control room. Conceptual design information that includes protection from hazardous chemicals and toxic gases is included, delineated by double brackets **(f[** 1]), in Section 6.4, Section 9.4.1, and Section 16.0 - Technical Specifications 3.7.10, 5.5.17, and corresponding bases for 3.7.10 and 3.7.12.
- **"** The portions of the circulating water supply system outside the Turbine Building. Conceptual design information for this system is presented, delineated by double brackets ([[]]), in Section 10.4.5, based upon a cooling tower approach.
- * Security structures, systems, and components outside the U.S. EPR buildings listed above. Conceptual design information for these structures, systems, and components is included, delineated by double brackets ([**[**]]), in Section 13.6.
- **"** The offsite power transmission system including the main switchyard area. Conceptual design information for this system is included, delineated by double brackets **([[** f]), in Section 8.2.
- The lightning protection and grounding system grid. Conceptual design information for this system is included, delineated by double brackets ([[]]), in Section 8.3.1.

Table 1.8-1-Summary of U.S. EPR Plant Interfaces with Remainder of Plant, identifies the interfaces between the U.S. EPR standard design and the remainder of the plant. The safety-related interface requirements in Table 1.8-1 have been selected based on a review of interfaces between the U.S. EPR standard design and other COL applicant or site-specific items. The interface types are classified as follows:

- * U.S. EPR interface: Assumptions made for the U.S. EPR design that must be verified during the coordination effort between the designer of the U.S. EPR and the COL applicant.
- Site Parameters: Site-related parameters upon which the U.S. EPR design is based.

The classification of SSCs is further described in Section 3.2. The representative conceptual designs for the portions of the plant that are not submitted for certification are described in the FSAR to satisfy the requirement of 10 CFR 52.47(a)(24).

1.8.1 COL Information Items

Table 1.8-2-U.S. EPR Combined License Information Items, lists the **COL** information items and the section where the information is discussed. A **COL** applicant that references the U. S. EPR design certification will identify the FSAR section, or provide a list, that demonstrates how the **COL** information items have been addressed. The applicable FSAR sections and Table 1.8-2 also identify when an activity required by a COL information item requires as-built information or other conditions that are not available when the **COL** application is submitted. These activities are completed prior to fuel load.

1.8.2 Departures

A **COL** applicant that references the U. S. EPR design certification will provide a list of any departures from the FSAR in the **COL** FSAR.

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Table 1.8-1-Summary of **U.S.** EPR Plant Interfaces with Remainder of Pl<mark>an</mark>t Sheet **I** of 2

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Item No.	Description	Section	Action Required by COL Applicant	Action Required by COL Holder
$9.5 - 14$	A COL applicant that references the U.S. EPR design certification will submit site specific information to address the Regulatory Guide 1.189, Regulatory Position C.6.2.6, Cooling Towers.	Table 9.5.1-1, Section C.6.2.6	Y	
$9.5 - 15$	A COL applicant that references the U.S. EPR design certification will submit site specific information to address Regulatory Guide 1.189, Regulatory Position C.7.6, Nearby Facilities.	Table 9.5.1-1, Section C.7.6	Y	
$10.0 - 1$	A COL applicant that references the U.S. EPR design certification will select Sections 10.1, 10.2 and 10.4.7 or 10.1A, 10.2A and 10.4.7A for inclusion in the COL FSAR as applicable to the chosen turbine-generator design option.	10.0	Y	
$10.2 - 1$	A COL applicant that references the U.S. EPR design certification will provide the site-specific turbine rotor inservice inspection program consistent with the recommendations of the manufacturer.	10.2A.3.6	Y	
$10.2 - 2$	A COL applicant that references the U.S. EPR design certification will provide applicable material <i>data from properties of the turbine</i> rotor after the site-specific turbine has been procured.	10.2.3.31 10.2A.3.31		Y
$10.2 - 3$	A COL applicant that references the U.S. EPR design certification will provide applicable turbine disk rotor specimen test data, load- displacement data from the compact tension specimens and the fracture toughness properties after the site-specific turbine has been procured.	10.2.3.2 10.2A.3.2		Y
$10.2 - 4$	A COL applicant that references the U.S. EPR design certification, and selects the alternate <u>turbine, will provide a list of material</u> specifications for the alternate turbine-generator components.	<u>10.2A.2.1.1</u>	Y	
$10.3 - 1$	A COL applicant that references the U.S. EPR design certification will identify the authority responsible for implementation and management of the secondary side water chemistry program.	10.3.5	Y	

Table **1.8-2-U.S.** EPR Combined License Information Items Sheet **28** of 40

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2.4 Hydrologic Engineering

The U.S. EPR is designed for a groundwater elevation up to 3.3 feet below the finished grade elevation and an exterior flood level of one foot below the finished grade elevation. For factored load combinations, the lateral soil load is based on saturated soil associated with flooding and groundwater. The finished yard grade is nominally one foot below ground floor top of concretczcre **fcct** clcvation, with slopes provided for drainage to preclude water from entering the buildings. No safety-related dewatering systems are provided in the U.S. EPR. Flood protection features are described in Section 3.4.

The U.S. EPR is designed for a maximum rainfall rate of 19.4 inches per hour. A rain, snow, and ice load of 100 pounds per square foot has been used, which includes the weight of the 100-year return period snow pack and the weight of the 48-hour probable maximum winter precipitation.

The hydrologic information in Section 2.4 is site specific and will be provided by the Combined License (COL) applicant that references the U.S. EPR design certification.

Sites are acceptable that are within the envelope of the groundwater and flood water maximum elevations described for the U.S. EPR standard plant design.

2.4.1 Hydrologic Description

A COL applicant that references the U.S. EPR design certification will provide a sitespecific description of the hydrologic characteristics of the plant site.

2.4.2 Floods

A COL applicant that references the U.S. EPR design certification will identify sitespecific information related to flood history, flood design considerations, and effects of local intense precipitation.

2.4.3 Probable Maximum Flood (PMF) on Streams and Rivers

A COL applicant that references the U.S. EPR design certification will provide sitespecific information to describe the probable maximum flood of streams and rivers and the effect of flooding on the design.

2.4.4 Potential Dam Failures, Seismically Induced

A COL applicant that references the U.S. EPR design certification will verify that the site-specific potential hazards to safety-related facilities due to the seismically-induced failure of upstream and downstream water control structures are within the hydrogeologic design basis.

2.6.4.10 Static Stability

Static stability pertaining to bearing capacity and settlement for the U.S. EPR is described in the following section. Additional information is provided in Section 3.8.5 for the foundations of Seismic Category I structures.

2.5.4.10.1 Bearing Capacity

The maximum bearing pressure under static loading conditions for the foundation basemat beneath the NI Common Basemat Structures is 22,000 lb/ft², which includes the dead weight of the structure and components and 25 percent of the live load. The maximum bearing pressure under safe shutdown earthquake loads combined with other loads, as described in Section 3.8.5, is $25,000 \frac{b}{\pi^2}$. Refer to Appendix 3E for details of these bearing pressures under the basemat (GDC 2).

A COL applicant that references the U.S. EPR design certification will verify that sitespecific foundation soils beneath the foundation basemats of Seismic Category I structures have the capacity to support the bearing pressure with a factor of safety of 3.0 under static conditions.

2.5.4.10.2 Settlement

Safety-related structures, systems and components are housed primarily in structures supported by the foundation basemat for the NI Common Basemat Structures and independent foundation basemats for the EPGBs and the ESWBs. The design of the Seismic Category I foundations for the U.S. EPR is based on a maximum differential settlement of $\frac{1}{2}$ inch per 50 ft in any direction across the basemat. Settlements within this limit will not adversely affect the function of safety-related structures, systems, or components based on the design basis for relative displacements between SSCs (GDC 2).

Total settlement is dependent on site specific conditions, construction sequence, loading conditions, and excavation and dewatering plans. Up to three inches of settlement might occur-following first placement of concrete. At settlement values on the order **of** three inches, no shear failure **of** the fouindations, general or local, **is** expected. It is expected that all elastic settlement and most of the consolidation settlement will occur by the time of completion of construction. There are limited interfaces between systems located on different basemats. The effects of settlement and differential settlement are considered where these interfaces occur. As described in Section 3.8.4.1.8 and Section 3.8.4.1.9, the design of safety-related buried conduits and piping is site-specific. These features will be designed for site-specific values of settlement and differential settlement expected at the interface with the foundation basemat after connections are made. Alternatively, site-specific structural features such as tunnels may be used to limit the imposition of differential settlement.

A COL applicant that references the U.S. EPR design certification will verify that the differential settlement value of $\frac{1}{2}$ inch per 50 ft in any direction across the foundation basemat of a Seismic Category I structure is not exceeded. Settlement values larger than this may be demonstrated acceptable by performing additional site-specific evaluations.

0 The pipe movement is assumed to occur in the direction of the jet reaction, unless it is physically limited by means of whip restraint, structural members, or pipe stiffness as established by inelastic limit analysis.

3.6.2.1.3.3 Leakage Cracks

Leakage cracks are postulated at axial locations specified in Section 3.6.2.1.1.3 for highenergy piping and in those moderate-energy piping systems that are not exempted in Item 1 of Section 3.6.2.1.2.2.

- Leakage cracks are not postulated in piping one inch NPS or smaller.
- For high-energy piping, leakage cracks are postulated in the circumferential locations that yield the most severe environmental consequences, and for moderate-energy piping leakage cracks are postulated at circumferential and axial locations that yield the most severe environmental consequences.
- Leakage cracks are postulated to be circular openings with an area equal to a rectangle with dimensions $\frac{1}{2} d_p x \frac{1}{2} t_n$, where d_p is the inside pipe diameter and t_n is the nominal wall thickness.
- The flow from a leakage crack is assumed to result in an environment that wets unprotected components within the compartment, with consequent flooding in the compartment and communicating compartments. Flooding effects are determined on the basis of a conservatively estimated time period required to take corrective actions. Section 3.4 provides additional information on flooding effects.

3.6.2.2 Guard Pipe Assembly Design Criteria

Guard pipes in containment penetration areas meet the requirements of Class MC, Subsection NE of Section III of the ASME Code where the guard pipe is part of the containment boundary. In addition, the guard pipe assemblies are designed to also meet the following requirements:

- Guard pipe assemblies are tested to a pressure not less than their design pressure.
- * Design pressure and temperature are not less than the maximum operating pressure and temperature of the enclosed pipe during normal plant conditions.
- * Containment design pressure and temperature, combined with safe shutdown earthquake loading, does not cause stress in the guard pipe assemblies to exceed Level C service limits from Subarticle NE-3220 in Section III of the ASME Code.
- Guard pipes do not prevent access for performing inservice inspections of piping welds, as required by Item 3 in Section 3.6.2.1.1.1. Additional information on inservice inspection and testing of the reactor coolant pressure boundary is provided in Sections 5.2.4 and 6.6.8.

A COL applicant that references the U.S EPR design certification will provideinformation regarding the implementation of the design criteria relating toprotective assemblies or guard pipes, including their-final design and arrangementof the access openings used to examine the process pipe welds within suchprotective assemblies to meet the requirements of the inservice inspectionprogram for the plant.

3.6.2.3 Analytical Methods to Define Forcing Functions and Response Models

Movement of pipe, due to pipe breaks and cracks, is analyzed to show that the motion does not result in overstress of any structure, system, or component important to safety. This section will address the criteria for dynamic or pseudo-dynamic analysis of piping systems, targets, and protection devices. Criteria for the dynamic analysis that will be followed are:

- For each postulated pipe break an analysis of the dynamic response of the broken pipe is performed.
- **a** In the case of circumferential pipe breaks, the need for a pipe whip dynamic analysis is determined based on the driving energy of the fluid.
- Mass inertia and stiffness properties of the systems, elastic and inelastic deformation of piping systems, impact and rebound, and support boundary conditions are adequately accounted for when calculating the dynamic response of piping and restraints.
- Loading condition (pressure, temperature, and inertial effects) prior to rupture is used in the evaluation of postulated breaks. For piping pressurized during normal power operation, the initial conditions are the greater of system energy at hot standby or at 102 percent of rated power.
- * Crushable material used to dissipate the energy of a moving pipe is limited to **80** percent of its rated energy dissipating capacity. **A 10** percent increase of the design yield strength **(Sy)** is used to account for strain rate effects.
- Unrestrained whipping pipe is considered to be capable of causing circumferential and longitudinal breaks, individually, in smaller **NPS** piping and leakage cracks in piping that is of equal or larger **NPS** with thinner wall thickness, except where analytical or experimental justification is provided that demonstrates that the impact does not cause rupture.

A representative mathematical model of a piping system and its restraints is shown in Figure 3.6.2-1---Representative Mathematical Model of a Piping System and its Restraints. The analytical methods used to predict the response of the piping and restraint system are presented in the sections below.

3.7.2.7 Combination of Modal Responses

When the response spectrum method of analysis is used, the maximum modal responses are combined using one of the methods specified in RG 1.92, Section C, Revision 2. Such combination methods include the grouping method, ten percent method and double sum methods, and they consider the effects of closely spaced modes having frequencies differing from each other by 10 percent or less of the lower frequency.

The effect of missing mass for modes not included in the analysis is accounted for by calculating the residual seismic load equal to the ZPA on the input response spectrum times the missing mass. The residual seismic load is added to the combined modal response determined from the response spectrum method of analysis.

3.7.2.8 Interaction of Non-Seismic Category **I** Structures with Seismic Category **I Structures**

Figure 1.2-1 and Figure 3B-1 show the layout of structures for a typical U.S. EPR standard plant. The Access Building and Turbine Building are site-specific structures. A COL applicant that references the U.S. EPR design certification will provide the sitespecific separation distances for the Access Building and Turbine Building. The potential for seismic-induced interaction between Seismic Category I structures and non-seismic Category I structures is assessed to verify the ability of Seismic Category I SSCs to perform their safety functions. The basis for the seismic interaction. assessment guidelines given below is the prevention of structure-to-structure impact.

- The collapse of the non-Category I structure does not cause the non-Category I structure to strike a Category I SSC.
- The collapse of the non-Category I structure does not impair the integrity of seismic Category I SSCs, nor result in incapacitating injury to control room occupants.
- **"** Conventional Seismic structures that have the potential to interact with Seismic Category I structures are assessed for collapse potential under SSE and tornado loading (acting independently). Seismic demand for the SSE is computed in accordance with ASCE 4-98, Reference 1 and the methodologies in Section 3.7.2. Seismic load combinations are developed in accordance with ASCE 43-05 (Reference 5), using a limiting acceptable condition for the structure characterized as short of collapse, but structurally stable (i.e., Seismic Design Category 5 - Limit State A) as specified in the Standard.
- For Conventional Seismic structures that have the potential to interact with Seismic Category I structures, the combined seismic deflection is less than the separation distance (i.e., gap) between the structures.

0 In the case where damage to Category I SSCs cannot be precluded by the criteria above, the structure is classified as Seismic Category II and designed to the same criteria as Seismic Category I structures.

The seismic interaction criteria and assessment guidelines are summarized in Table 3.7.2-29 -Seismic Structural Interaction Criteria for Building Structures. The Vent Stack, NAB, Access Building (AB), and the Turbine Building (TB) are Conventional Seismic structures that have potential to interact with the NI Common Basemat Structures. Results of the seismic interaction assessment for those structures are presented below, with associated discussions of the Radioactive Waste Processing Building (RWPB) and Fire Protection Storage Tanks and Building.

Vent Stack

The vent stack is described in Section 3.7.2.4.2 as a steel structure approximately 100 **ft** high located on top of the stair towercase structure between the FB and SB 4 (see. Figure 3B-1). The vent stack is classified as Seismic Category II and designed to the same requirements as Seismic Category I structures. The stack is also designed for design basis tornado loading. Therefore, the vent stack has no potential for adverse interaction with the NI Common Basemat Structures.

Nuclear Auxiliary Building

Figure 3B-1 shows that the separation gap between the Nuclear Auxiliary Building and the NI Common Basemat Structures is a minimum of 18 in. An evaluation of the potential for seismic interaction between the NAB and the NI Common Basemat Structures indicates that the maximum relative displacement, based on absolute values, between the two structures is slightly less than 9 in, or approximately one-half of the separation distance. The seismic induced displacements of NI Common Basemat Structures and NAB are calculated from a series of nonlinear analyses on finite element models of each structure with reduced degrees of freedom. The NI Common Basemat Structures and the NAB are modeled with five degrees of freedom each, consisting of three translations and two rotations (about the horizontal X-X and Y-Y axes). The reduced degree of freedom models capture the predominant structural and soil deformation modes, namely lateral displacements and rocking. The values of the masses, springs and dampers, as well as the geometry, are derived from the detailed finite element models of the respective structures.

To provide sufficient design margin to prevent collapse or unacceptable performance under SSE loading, the design forces and moments for critical structural elements of the NAB are modified in accordance with the guidance of Reference 5. A reduction in the forces and moments due to seismic effects is taken using an inelastic energy absorption factor (F_u) from Table 5-1 of ASCE 43-05 (Reference 5) for reinforced concrete shear walls. The inelastic energy absorption factor is based on the Limit State A criterion of ASCE 43-05 where permanent distortion, short of collapse, is permitted.

The factor is for seismic design criteria and, hence, no reduction in force and moments is taken for other load cases including tornado effects. The F_μ factor is applied to tension, in-plane shear, and out-of-plane bending moment. A value of $F_u = 2$ is adopted for in-plane bending moments and shear in conjunction with axial tension. Per Section C5.1.2.3 of ASCE 43-05, a value of $F_{\mu} = 1$ is used for out-of-plane shear in conjunction with axial tension. For elements subjected to combined axial force and bending, a value of $F_{\mu} = 2$ is only applied to moment. Applicable provisions and design criteria for RS structures are also applied in finalizing the design.

Access Building

[[The separation gaps between the AB and SBs 3 and 4 is 0.98 ft and 1.31 ft, respectively (see Figure 3B-1).]] The walls of the AB are not physically connected to the SBs except through crossovers (passageways) providing access to the SBs. SB 3 is protected by the aircraft hazard (ACH) shield wall which not only protects the structure but also isolates control room personnel from adverse impact effects. SB 4 is not protected by the ACH shield wall. The seismic interaction assessment of the AB confirms that the separation gaps between SBs 3 and 4 are sufficient to preclude interaction. The crossover passageways are designed to accommodate the differential displacements without imparting unacceptable loads to the supporting structures.

Turbine Building

[[The separation between the TB and NI Common Basemat Structures is approximately 30 ft (see Figure 3B-1). **]]** Seismic interaction between the TB and NI Common Basemat Structures is prevented through application of the following design approach, which is also summarized in Table 3.7.2-29.

- Design of the TB to the requirements of the International Building code, which invokes ACI 318 (Reference 6) for concrete structures.
- Use of AISC specification, "Seismic Provisions for Structural Steel Buildings (ANSI/ AISC 341)," (Reference 7) for lateral load-carrying steel bracing. (This follows the guidance in ANSI/AISC 360, "Specifications for Structural Steel Buildings," (Reference 7) for use of AISC 341 in a 'High Seismic Application' (Reference 9).
- Use of Appendix 1 **1A,** "Quality Assurance Provisions," of ASCE Standard 7-05 for **QA** requirements for the lateral bracing system (Reference 9).

Structural collapse under SSE loading is prevented by using the limiting acceptance criteria of ASCE 43-05, Seismic Design Category 5 - Limit State A.

In addition, crossovers from the TB to the NI Common Basemat Structures are supported primarily by the walls or roof of the ACH shield structure. Seismic interaction through the crossover is between the TB and the ACH shield structure rather than with SBs 2 and 3. Design measures limit the interaction forces between

the NI Common Basemat Structures and TB transmitted through the crossover structures. The ACH shield structure and design measures isolate control room personnel from adverse effects of the interaction forces generated through the crossover structures.

Radioactive Waste Processing Building

The RWPB has no significant potential to seismically interact with either the NI Common Basemat Structures or with the nearest Seismic Category I structure not on the common basemat (i.e., the EPGB) therefore, the RWPB is not evaluated for SSE. The NAB is located between the RWPB and the NI Common Basemat Structures and shields the NI Common Basemat Structures from potential interaction. Both the NAB and RWPB are classified as RS structures and are designed for the standard plant 1/2 SSE using criteria in RG 1.143 for RW-IIa structures. The resulting designs are ductile designs with inherent margin against catastrophic collapse under SSE. In addition, this same robust design provides inherent margin against progressive collapse of the NAB caused by seismic interaction with the RWPB. In addition, the evaluation of the NAB itself for seismic interaction with the NI Common Basemat Structures under SSE loading is described above. Therefore, the NAB shields the NI Common Basemat Structures from any adverse effect of collapse of the RWPB.

Potential interaction between the RWPB and EPGB is precluded by separation and by design and site selection and foundation design criteria for the RWPB. The RWPB is embedded over 31.5 **ft** below grade and has a clear height above grade of +52.5 **ft,** while the clearance between the RWPB and EPGB is 52.06 ft (see Figure 3B-1). Therefore, the separation between the two is only 5.28 in. less than the height above grade of the RWPB. Failure of the RWPB in such a manner as to strike the EPGB is not considered credible due to the separation distance and because of the seismic design for 1/2 SSE loading described above. In addition, site selection and foundation design criteria for the U.S. EPR standard plant ensure that the RWPB is founded on competent soils, while the embedded section 31.5 **ft** below grade provides additional stabilization against rotation.

i[Fire Protection Storage Tanks and Buildings1l

[[The Fire Protection Storage Tanks and Buildings are classified as Conventional Seismic Structures.]] RG 1.189 requires that a water supply be provided for manual firefighting in areas containing equipment for safe plant shutdown in the event of a **SSE.** Therefore, $f(T)$ fire protection storage tanks and building are designed to provide system pressure integrity under SSE loading conditions. Seismic load combinations are developed in accordance with the requirements of ASCE 43-05 using a limiting acceptance condition for the structure characterized as essentially elastic behavior with no damage (i.e., Limit State D) as specified in the Standard.]

The Fire Protection Storage Tanks and Buildings are site-specific structures. **A COL** applicant that references the **U.S.** EPR design certification will provide the seismic design basis for the sources of fire protection water supply for safe plant shutdown in the event of a **SSE.**

3.7.2.9 Effects of Parameter Variations on Floor Response Spectra

Uncertainties in seismic modeling, due to such items as uncertainties in material properties, mass properties, concrete cracking under normal loading, and structural and soil modeling techniques can affect the accuracy of floor response spectra calculated using any of the approaches for seismic analysis presented in Section **3.7.2. 1.** To compensate for the effect of these uncertainties, the ISRS for **U.S.** EPR Seismic Category I structures are broadened **by ±15** percent. These broadened ISRS are used in the subsequent design of structural elements of those structures, including flexible floors and walls.

3.7.2.10 Use of Constant Vertical Static Factors

Vertical seismic loads are generated from the SSI analysis for use in the seismic design of **U.S.** EPR Seismic Category I structures and Seismic Category II structures. Therefore, there is no need for the use of constant vertical static factors in the design of those structures.

3.7.2.11 Method Used to Account for Torsional Effects

Torsional effects due to the eccentricity built into the stick models or **3D** FEM of the structures are accounted for during the seismic SSI analysis. Additional seismic loads due to accidental torsion are accounted for as required **by** Standard Review Plan, Section **3.7.2,** Seismic System Analysis, paragraph H. **11** (Reference 2) and in **ASCE** 4- **98,** Reference **1.** This is to account for uncertainties in material densities, member sizes, architectural variations, equipment loads, etc., from design assumptions. Due to these potential uncertainties, an additional torsional moment is introduced into the design and evaluation of structural members.

For the NI Common Basemat Structures, the additional torsional moment at a particular elevation is calculated as the story inertia force in each horizontal direction of interest times a moment arm equal to five percent of the building plan dimension in the perpendicular direction. Results due to the story inertia forces in both horizontal directions are summed to produce the total additional torsional moment at the particular elevation. For design purposes, this torsional moment is taken to be resisted **by** only selected major shear walls, and a simplified **3D** FEM is developed for each of the NI Common Basemat Structures which includes only the selected shear walls. The additional torsional moment at each given elevation is applied to all wall nodes at the same elevation, constrained like a rigid diaphragm, of the simplified FEM to determine the additional design shear forces in the selected shear walls.

- * The RCS primary side fluid mass and internal energy, including the pressurizer.
- The secondary side fluid mass and internal energy, from feedwater inlet to the exit of the steam from the **SG.**
- The SIS injection flow and enthalpy.
- The RCS pressure, the average temperature for the vapor and liquid, and the final liquid-to-volume fraction.
- The mass flow of the SIS.

6.2.1.3.5 Single Failure Analysis

The effect of single failures of various SIS/RHR system components on the M&E releases is included in these analyses. No single failure is assumed in determining the M&E releases for the maximum safeguards case. For the minimum safeguards case, the single failure assumed is the loss of one emergency diesel generator that results the loss of one complete train of ESF equipment, including the loss of one safety injection train. The analysis of both maximum and minimum safeguards cases bounds the effects of credible single failures.

6.2.1.3.6 Metal-Water Reaction

The exothermic metal-water reaction is calculated using the Baker-just correlation, as specified in 10 CFR 50, Appendix K.

6.2.1.3.7 Energy Inventories

Inventories of the energy transferred from the primary and secondary systems to the containment, as well as the energy remaining in the primary and secondary systems, are provided in Table 6.2.1-23, Table 6.2.1-24, and Table 6.2.1-25 for the three break locations analyzed.

6.2.1.3.8 Additional Information Required for Confirmatory Analysis

System parameters and hydraulic characteristics needed to perform confirmatory analysis are provided in Table 6.2.1-21 and Figure 6.2.1-22 through Figure 6.2.1-33.

6.2.1.4 Mass and Energy Release Analysis for Postulated Secondary Pipe Ruptures inside Containment

Steam line ruptures inside a reactor containment structure may result in significant releases of high energy fluid to the containment environment, producing high containment temperatures and pressures. The M&E release following a main steam line break (MSLB) depends upon the configuration of the plant's main steam system, the containment design, the plant operating conditions, and the size of the pipe

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Table 6.2.1-18-Mass and Energy Results for Case **7A** Blowdown HL Sheet 2 of **10**

Table 6.2.1-18-Mass and Energy Results for Case **7A** Blowdown HL Sheet **3** of **10**

Table 6.2.1-18-Mass and Energy Results for Case **7A** Blowdown HL Sheet 4 of **10**

Table 6.2.1-18-Mass and Energy Results for Case **7A** Blowdown HL Sheet **5** of **10**

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Table 6.2.1-18-Mass and Energy Results for Case **7A** Blowdown HL Sheet **6** of **10**

Table 6.2.1-18-Mass and Energy Results for Case **7A** Blowdown HL Sheet **7** of **10**

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Table 6.2.1-18-Mass and Energy Results for Case **7A** Blowdown HL Sheet **8** of **10**

Table 6.2.1-18-Mass and Energy Results for Case **7A** Blowdown HL Sheet **9** of **10**

Notes:

- 1. Tabulated values are produced by averaging the instantaneous mass and energy releases at discrete times.
- 2. The code transition from RELAP5/MOD2-B&W to GOTHIC results in a discontinuity in the mass and energy releases due to distinct modeling approaches.
- 3. RCS upstream pressure equal to containment pressure over this interval.

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Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction Sheet 2 of **11**

Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction Sheet **3** of **11**

Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction Sheet 4 of **11**

Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction Sheet **5** of **11**

Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction Sheet **6** of **11**

Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction Sheet **7** of **11**

Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction Sheet **8** of **11**

Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction Sheet **9** of **11**

Table 6.2.1-19—Mass and Energy Results for Case 14E Cold Leg Pump Suction

Table 6.2.1-19-Mass and Energy Results for Case 14E Cold Leg Pump Suction

Notes:

1. Tabulated values are produced by averaging the instantaneous mass and energy releases at discrete times.

2. The code transition from RELAP5/MOD2-B&W to GOTHIC results in a discontinuity in the mass and energy releases due to distinct modeling approaches.

RCS upstream pressure equal to containment pressure over this interval. 3.

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet **1** of **11**

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet 2 of **11**

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Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet **3** of **11**

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet 4 of **11**

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet **5** of **11**

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B)

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet **7** of **11**

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet **8** of **11**

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet **9** of **11**

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Table 6.2.1-20—Mass and Energy Results for Case 31 CLPD (Long-Term Case B)

Table 6.2.1-20-Mass and Energy Results for Case **31** CLPD (Long-Term Case B) Sheet **11** of **11**

Notes:

1. Tabulated values are produced by averaging the instantaneous mass and energy releases at discrete times.

2. The code transition from RELAP5/MOD2-B&W to GOTHIC results in a discontinuity in the mass and energy releases due to distinct modeling approaches.

3. RCS upstream pressure equal to containment pressure over this interval.

Table 6.2.1-23—Containment Energy Distribution for Hot Leg Break

Sheet 1 of 2

Energy (BTU)

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Notes:

- 1. This is decay heat prior to long term transition. It should be added to decay heat after transition (see Note 3) for total decay heat in 24 hours.
- RHR heat removal after long term transition. $2.$

- **3.** Decay heat after long term transition.
- 4. This is heat removed by RHR system prior to long term transition. It should be added to heat removed after transition (see Note 2) for total RHR heat removal in 24 hours.

Table 6.2.1-24-Containment Energy Distribution for Cold Leg Pump Suction Break

Sheet 1 of 2
Energy (BTU)

Notes:

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- 1. This is decay heat prior to long term transition. It should be added to decay heat after transition (see Note 3) for total decay heat in 24 hours.
- 2. RHR heat removal after long term transition.
- **3.** Decay heat after long term transition.

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4. This is heat removed by RHR system prior to long term transition. It should be added to heat removed after transition (see Note 2) for total RHR heat removal in 24 hours.

Table 6.2.1-25-Containment Energy Distribution for Cold Leg Pump Discharge Break

Sheet 1 of 2
Energy (BTU)

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Notes:

- 1. This is decay heat prior to long term transition. It should be added to decay heat after transition (see Note 3) for total decay heat in 24 hours.
- 2. RHR heat removal after long term transition.
- 3. Decay heat after long term transition.
- 4. This is heat removed by RHR system prior to long term transition. It should be added to heat removed after transition (see Note 2) for total RHR heat removal in 24 hours.

Figure **6.2.1-16-LOCA** Containment Pressure **vs.** Time **(CLPS** Break Longterm)

Figure 6.2.1-17-LOCA Containment Temperature vs. Time (CLPS Break Long-term)

Figure 6.2.1-30-LOCA Integrated Break Mass Flow vs. Time (CLPS Break, Long-Term)

Figure **6.2.1-31-LOCA** Integrated Break Energy Flow vs. Time **(CLPS** Break, Long-Term)

6.4 Habitability Systems

The main control room (MCR) habitability systems are designed to allow control room operators to remain in the MCR to operate the plant safely under normal conditions and to maintain the plant in a safe state under accident conditions.

The habitability systems protect the plant operators from the effects of accidental releases of [[toxic and]] radioactive gases. The systems also provide the necessary support for the technical support center (TSC) personnel in case of an accident or abnormal event. The TSC is contained within the control room envelope (CRE).

The term "habitability systems" refers to equipment, supplies, and procedures. The habitability equipment is defined in Section 6.4.2.1.

Control room habitability system objectives include:

- Missile protection and radiation shielding (Section 3.8).
- Air filtration (Section 6.5.1, Section 9.4.1).
- Pressurization and air conditioning (Section 9.4.1).
- Fire protection (Section 9.5.1).
- Radiation monitoring (Section 12.3.4).
- **IIDetection of and protection from toxic gases and hazardous chemicals.**
- Lighting (Section 9.5.3).
- **"** Personnel support.

6.4.1 Design Basis

Control room habitability is provided, so that the plant can be operated safely under normal conditions, and maintained safely under accident conditions or abnormal events. These design bases relate to MCR habitability:

- * Habitability systems are designed to accommodate the effects of environmental conditions associated with normal operation, maintenance, testing, and postulated accidents and are protected against dynamic effects that may result from equipment failures and from events and conditions outside the nuclear power unit (GDC 4).
- The MCR habitability systems are not shared among multiple nuclear power units (GDC 5).
- The CRE is protected from radiological releases to permit access and occupancy of the main control room under accident conditions (GDC 19).

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- If The CRE is protected from hazardous chemical releases to permit access and occupancy of the main control room.]]
- * The main control room air conditioning system (CRACS) provides the capability to isolate the CRE from the surrounding areas, pressurize the CRE to prevent inleakage, and filter supply air to remove radioactive halogens (10 CFR 50.34(f)(2)(xxviii)).
- * The air intake structures are physically separated and located away from potential radiological sources, (10 CFR 50.34(f) (2) (xxviii)).
- The CRE design permits periodic testing and in-service inspection to confirm integrity.

The CRACS design bases are presented in Section 9.4.1.

6.4.2 System Design

6.4.2.1 Definition of Control Room Envelope

The MCR contains the equipment necessary to monitor and control the plant during all operating conditions and to bring the plant to a safe shutdown state.

The CRE comprises these areas:

- Main control room.
- Shift supervisor's office.
- Integrated operations area including:
	- Technical support center.
	- NRC office area.
	- Break area.
- **"** Sanitary facilities.
- Instrumentation and controls (I&C) service center.
- **"** Service corridors.
- Computer rooms.
- * Equipment rooms that contain MCR ventilation supply, filtration, and air conditioning systems.

The CRE is housed within Safeguard Buildings 2 and 3. The CRE is shown in Figure 6.4-1-Control Room Envelope Plan View 1, Figure 6.4-2-Control Room Envelope

Plan View 2, and Figure 6.4-3-Control Room Envelope Elevation View. The total free-air volume of the CRE is approximately 200,000 ft^3 .

These personnel support items are maintained within the confines of CRE in sufficient quantities for required operational personnel:

- Non-perishable food supply and drinking water.
- **"** Emergency medical supply kits.
- SCBA units, air supply equipment and protective clothing for protection from smoke **[[**, and toxic or noxious gases]].
	- SCBA units contain a minimum of six hours of air supply capacity, [Las] specified by RG 1.78]1.

Food, water, and medical needs of the control room personnel are met using the site emergency preparedness process for providing these services to emergency centers, following the guidance of NUREG-0654 (Reference 1). Emergency planning is addressed in Section 13.3.

6.4.2.2 Ventilation System Design

The CRACS design is described in Section 9.4.1, which identifies and describes major components, design parameters and classifications, instrumentation and controls, and provides a system schematic. Figure 15.0-4 presents airflows through the system for post-accident filtration. Section 6.5.1 describes the engineered safety features (ESF) filter systems and fission product removal capability for the CRACS.

Section 3.8.4 contains elevation and plan views of the Safeguard Buildings. Figure 2.3- 1 provides the relative locations of potential radiological release points and the **CRACS** air intakes. The evaluation of potential toxic chemical accidents is addressed in Section 2.2.3. Figure 6.4-1 through Figure 6.4-3 illustrate the CRE layout, including surrounding corridors, doors, stairwells and shielded walls.

The CRACS intakes are located on the roof of Safeguard Buildings 2 and 3, to prevent **a** intrusion of toxic gases **orfl** radiological contamination. The two intakes are physically separated and are removed from potential radiological release points, including the main steam relief exhaust, the Safeguard Building depressurization shafts, and the stack, in both lateral and vertical directions. Section 15.0.3 identifies the bounding atmospheric release point used in the radiological analyses.

Radiation monitors in the CRACS supply air duct continuously measure the concentration of radioactive materials in the supply air. The control room airborne radioactivity monitoring system is addressed in Section 12.3.4.

The main features related to control room habitability of the CRACS design are:

Under normal operating conditions:

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- The ventilation system operates in the recycling mode with fresh air makeup.
- The air makeup rate corresponds to the exhausts from the kitchen and sanitary rooms and leakage out of the area due to the controlled overpressure.
- * The ventilation system maintains an ambient condition for comfort and safety of control room occupants and to support operability of the MCR components during normal operation, anticipated operational occurrences (AOO), and design based accidents (DBA).
- The ventilation system maintains a positive pressure of 0.125 inches water gauge as a minimum within the CRE areas with respect to adjacent environmental zones to prevent uncontrolled, unfiltered in-leakage during normal and accident conditions. The filtered outside air supply rate during accident conditions corresponds to 0.3 volume changes per hour.
- During a site radiological contamination event, the air intake is redirected through the ESF filter system trains..
- [[Control room operators are protected from chlorine releases and other toxic gases in accordance with RG 1.52, RG 1.78, and ASME AG-1 (Reference 2).]
- The ventilation system can be operated in full recirculation mode without outside air makeup during DBAs \Box events involving toxic gas releases \Box . The recirculated airflow rate is 17,000 cfm.
- The ventilation system provides adequate capacity for proper temperature and humidity within the CRE.
	- Redundancy for air cooling, filtration, and toxic gas protection is provided by having two independent trains for critical functions.
	- Redundancy is provided for proper operation of the system when one active component is out of service.
	- Power supplies of the active components are backed up with emergency power so that they function in case of a loss of offsite power.

6.4.2.3 Leaktightness

The CRACS is maintained in a manner that minimizes the unfiltered in-leakage across the CRE boundary. Adequate leak tightness for air sealing components supports operator habitability within the CRE boundary during normal operation, AOOs and DBAs.

Leak tightness provisions for pressure boundary components are:

- * Pipe penetrations are sealed and tested for air leakage after initial construction.
- Cable penetrations are sealed and tested for air leakage after initial construction.

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- Doors used for personnel or equipment access are sealed and remain substantially air-tight to maintain pressurization of the CRE area. Doors are arranged to allow access by necessary operational personnel and maintain pressurization of the CRE area. Two access doors are arranged in series to form a configuration similar to an air lock, minimizing in-leakage from surrounding areas.
- Open ended drain lines are provided with water seals.
- All building joints within the CRE boundary are sealed.

The CRACS maintains a positive pressure of 0.125 inches water gauge as a minimum within the CRE boundary, which limits unfiltered in-leakage through walls, ceiling, doors, pipes and cable penetrations.

The CRE boundary limits leakage from adjacent environmental zones to a maximum of 50 cfm unfiltered in-leakage. The system design requirements are provided in Section 9.4.1 and testing requirements are specified in the control room envelope habitability program in the technical specifications Section 5.5.17.

6.4.2.4 Interaction with Other Zones and Pressure-Containing Equipment

The **CRACS** does not supply air to areas other than the CRE. The air supply filtration and air conditioning systems are within the pressure boundary, thus minimizing the potential in-leakage of contaminated air into the MCR through fan shafts or ductwork connections.

The CRE area is isolated and pressurized in the event of an outside fire, [[external toxic and the smoke smoke and excessive concentrations of carbon monoxide or carbon mass gas release,<u>II</u> smoke, and excessive concentrations of carbon monoxide or carbon in full recirculation mode. Upon detection of $[[$ toxic gas or $]]$ smoke, audible or visual alarms are actuated in the MCR. The **CRACS** and filter systems can be manually aligned from the MCR.

Fire barriers with a three hour fire rating enclose the MCR. Openings penetrating the fire barrier are furnished with both fire doors and fire dampers or approved fire rate seals meeting the associated barrier fire duration rating. In case of a fire within the CRE area, the room supply and exhaust are isolated by fire dampers and monitoring and control of the plant can be performed from the remote shutdown station (RSS). The RSS is located in a different fire zone and is on a different elevation than the MCR, and is not contained within the CRE boundary. The RSS is described in Section 7.4.

The **CRACS** does not interact with air conditioning equipment serving adjacent zones, minimizing the possibility of transferring [[toxic or]] radioactive gases into the CRE. Piping not connected or related to the equipment within the CRE boundary is routed outside the pressurized boundary of the CRE.

The MCR is not located near pressure-containing tanks, equipment, or piping, such as **CO2** tanks or steam lines, which upon failure could transfer dangerous or hazardous material to the CRE. However, portable self-contained breathing apparatus (SCBA) are available for use by the control room operators.

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6.4.2.5 Shielding Design

Massive concrete structures separate the MCR from the reactor containment atmosphere and the external environment, as described in Section 3.8. The thick concrete walls prevent any significant direct radiation shine from outside the Safeguard Buildings. The MCR is protected against direct shine from the MCR charcoal filtration system by a 19 inch concrete floor. Radiation sources and shielding requirements are identified in Section 12.2 and Section 15.0.3. The MCR dose calculations that are presented in these sections identify the contribution from direct radiation shine and demonstrate that the total MCR dose under accident conditions is within regulatory limits.

6.4.3 System Operational Procedures

During normal plant operation, the CRACS maintains acceptable environmental conditions within the CRE boundary. Upon receipt of a high radiation signal in the air intakes or a primary containment isolation signal, the system is automatically switched so that the intake is routed through the emergency filtration system. The operating modes of the CRACS are described in Section 9.4.1.

 \iiint Upon detection of any hazardous chemicals in the environment which have a potential for infiltration within the CRE boundary, the control room operator will take protective measures within a short period of time from the initiation of the toxic gas sensors and alarms. The operators are not subjected to prolonged exposures during this time.] Storage provisions for SCBAs and procedures for their use allow operators to begin using the SCBAs within a short period of time after detection of a radiological event [[or a hazardous release]].

A **COL** applicant that references the U.S. EPR design certification will provide written emergency planning and procedures in the event of a radiological or a hazardous chemical release within or near the plant, and will provide training of control room personnel.

6.4.4 Design Evaluations

Section 9.4.1 contains the design evaluation of the CRACS. Fire protection inside and outside the CRE boundary is addressed in Section 9.5.1.

The total effective dose equivalent (TEDE) for the MCR occupants throughout the duration of any postulated DBA does not exceed the limits of **GDC** 19. The evaluation of radiological exposure to control room operators and the dose calculation model for the MCR is described in Section 15.0.3.

The CRE is designed, maintained and tested in accordance with RG 1.196 and RG 1.197. Habitability systems provide the capability to detect and protect personnel within the CRE boundaries from external fires, smoke, [[toxic gases]] and airborne radioactivity.

A **COL** applicant that references the U.S. EPR design certification will confirm that the radiation exposure of MCR occupants resulting from a DBA at a nearby unit on a

multi-unit site is bounded by the radiation exposure from the postulated design basis accidents analyzed for the U.S. EPR; or confirm that the limits of GDC 19 are met.

The evaluation of potential toxic chemical accidents is addressed by the applicant in Section 2.2.3 and includes the identification of toxic chemicals. A COL applicant that references the U.S. EPR design certification will evaluate the results of the toxic chemical accidents from Section 2.2.3 and address their impact on control room habitability in accordance with RG 1.78.

6.4.5 Testing and Inspection

Testing and inspection of the CRACS are described in Section 9.4.1.Refer to Section 14.2 (test abstract #082) for initial plant testing.

Periodic testing to confirm CRE integrity is performed using testing methods and at testing frequencies consistent with RG 1.197. The air in-leakage test (tracer gas test) of the CRE boundary is performed in accordance with ASTM E741 (Reference 3). Air quality testing is performed in accordance with ASHRAE 62 (Reference 4).

The control room envelope habitability program in the technical specifications Section 5.5.17 defines testing requirements.

6.4.6 Instrumentation Requirements

The instrumentation and control features of the CRACS are described in Section 9.4.1. Radiation monitoring equipment for the CRE is described in Section 12.3.4.

 $[$ [Toxic chemicals whose release has the potential to affect control room operators are monitored by toxic gas sensors. A list of chemicals and their locations is provided in Section 2.2.11 **A COL** applicant that references the **U.S.** EPR design certification will identify any Seismic Category I Class IE toxic gas sensors necessary for control room operator protection.

6.4.7 References

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- 1. NUREG-0654/FEMA-REP-1 Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980.
- 2. ASME AG-1-2003, "Nuclear Air and Gas Treatment," American society of Mechanical Engineers, 2003.
- 3. ASTM E741-2000, "Standard Test Methods for Determining Air Change in a Single Zone by Means of a Tracer Gas Dilution," American Society for Testing and Materials, 2000.
- 4. ASHRAE 62-1989, "Ventilation for Acceptable Indoor Air Quality," American Society of Heating, Refrigerating and Air-Conditioning Engineers, 1989.

9.4 Air Conditioning, Heating, Cooling and Ventilation Systems

The heating, ventilation, and air-conditioning (HVAC) system for each major building or area is provided in the following subsections.

9.4.1 Main Control Room Air Conditioning System

The main control room air conditioning system (CRACS) is designed to maintain a controlled environment in the control room envelope (CRE) area for the comfort and safety of control room personnel and to support operability of the control room components during normal operation, anticipated operational occurrences and design basis accidents. CRACS is also relied upon to cope with and recover from a station blackout (SBO) event.

The air conditioning system for the CRE area operates in the recirculation mode with fresh air makeup. The fresh outside air intake and recirculated air are filtered and conditioned through the filtration trains. The conditioned air is then supplied to the CRE area. During a site radiological contamination event, the fresh air intake is redirected through the iodine filtration trains.

The main control room (MCR) habitability system, including the definition of the CRE area, is addressed in Section 6.4.

Under emergency conditions, when the iodine filtration train subsystem of **CRACS** is utilized, the subsystem function is designated as control room emergency filtration (CREF). See Technical Specification 3.7.10 in Chapter 16.

9.4.1.1 Design Bases

All components of the **CRACS** are safety related and designed to Seismic Category I requirements.

- **"** The **CRACS** components are located inside the Safeguard Building (SB) divisions two and three. These buildings are designed to withstand the effect of natural phenomena, such as earthquake, tornados, hurricanes, floods and external missiles (GDC 2).
- The quality group classification (Section 3.2) meets the requirements of RG 1.26. The seismic design of the system meets the guidance of RG 1.29 (Position **C.1** for the safety-related portion and Position **C.2** for the non-safety-related portion).
- **"** The **CRACS** components are appropriately protected against dynamic effects and designed to accommodate the effects of, and be compatible with the environmental conditions of normal operation, maintenance, testing, and postulated accidents (GDC 4).

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- * The safety-related components and systems of the CRACS are not shared among nuclear power units (GDC 5).
- The CRACS provides adequate protection against radiation [[and hazardous chemical releases]] to permit access to and occupancy of the control room under accident conditions (GDC 19). [[The control room occupancy protection requirements meet the guidance of RG 1.78. \downarrow
- **"** The release of radioactive materials to the environment is controlled by meeting the guidance of RG 1.52 and 1.140 (GDC 60). In case of an alarm from the area radiation monitors, the CRACS directs the air intake automatically through activated carbon filtration beds. The air from CRE areas can also be recirculated through the same activated carbon filtration beds.
- Capability for withstanding or coping with a SBO event is provided to comply with the requirements of 10CFR 50.63. Acceptance is based on meeting the applicable guidance of RG 1.155, including position C.3.2.4. Refer to Section 8.4 for a description of the design features to cope with the SBO event.
- **"** The CRACS maintains habitability of the CRE areas during a site radiological contamination event \iint or toxic contamination of the environment \iint (Refer to Section 6.4).
- Control and maintain a positive pressure of 0.125 inches water gauge as a minimum within the CRE areas with respect to the surrounding area to prevent uncontrolled incoming leakage.
- The CRACS maintains system performance in the event of failure of a single active safety-related component.
- The CRACS outside air intake is capable of detecting radiation- $\frac{1}{2}$ and smoke $\left[\frac{1}{2}\right]$ -and toxic chemicals]] (see Section 6.4.2.4 for discussion of toxic gas sensors and COLapplicant's responsibility to identify those sensors). Associated monitors actuate alarms in the MCR.
- **"** Upon receipt of a containment isolation signal, or high radiation alarm signal in the air intake duct, the iodine filtration train starts automatically and the outside air and CRE recirculation air are automatically diverted through the iodine filtration train. The outside makeup air along with the CRE recirculation air maintains a positive pressure inside the CRE area relative to the adjacent areas. The CRE air inlet and recirculation dampers operate automatically.
- **⁶**LJUpon actuation of the plant toxic gas alarm signal, the outside air intake dampers close automatically and the CRE air is automatically diverted in the recirculation mode without outside air.]]

The CRAGS is capable of isolating all non-safety-related system penetrations of the CRE boundary so that occupation and habitability of the control room is not compromised.

- The CRACS maintains the following temperature and humidity ranges for the areas serviced:
	- Main Control Room: 65°F to 76°F (40 to 60 percent humidity).
	- Other areas of CRE: 68°F to 79°F (30 to 60 percent humidity).

9.4.1.2 System Description

9.4.1.2.1 General Description

The CRACS is designed to maintain acceptable ambient conditions inside the CRE areas to provide for proper operation of equipment and for personnel access to conduct inspection, testing and maintenance. The CRE area is shown in Figures 6.4-1 through 6.4-3.

The CRACS consists of following subsystems:

- Air intake.
- Iodine filtration train.
- Recirculation air handling.
- Air supply and recirculation.
- Kitchen and sanitary rooms exhaust.

Air Intake Subsystem

The air intake subsystem is illustrated in Figure 9.4.1-1—Control Room Air Intake and Iodine Filtration Train Subsystems.

Fresh air is supplied by an outside air intake through a wire mesh grille, one intake for SB division two and another for SB division three. Sensors on the outside air inlet protect against [[toxic gas (refer to Section 6.4.2.4) and]] radiological intrusion. Each outside air intake is equipped with an electrically heated, weather protected grille to prevent ice formation. Outside air is diverted into two fresh air intake trains for each division (total of four trains).

Two identical fresh air intake trains for each division are physically separated. In each train, air is directed through motorized dampers, an electric heater, and a prefilter. Fresh air is then mixed with the recirculated air from the CRE area prior to conditioning by the air handling units.

Iodine Filtration Train Subsystem

The iodine filtration train subsystem is illustrated in Figure 9.4.1-1.

There are two iodine filtration trains located separately in the SB divisions two and three (one train in each division) in parallel with the associated intake trains. These trains provide an alternate path for fresh air intake and CRE recirculated air when site contamination is detected. Each train consists of an inlet motorized isolation damper, an electric heater, a prefilter, an upstream high efficiency particulate air (HEPA) filter, an iodine filter with activated carbon, a downstream HEPA filter, an outlet motorized isolation damper, a supply air fan, and a backdraft damper. The motorized dampers operate automatically to isolate or align the iodine filtration trains.

Recirculation Air Handling Subsystem

The recirculation air handling subsystem is illustrated in Figure 9.4.1-2—Control Room Recirculation Air Handling Subsystem.

There are four recirculation air handling units located in the SB divisions two and three (two trains in each division). Recirculated and fresh air is processed through these air handling units and supplied to a common supply air plenum in divisions two and three. Each train includes an isolation damper, a volume control manual damper, a cooling coil, a moisture separator, fan suction and discharge silencers, a supply air fan, a HEPA filter, a steam humidifier, a non-return damper, and a volume control electric damper. The cooling coil is supplied with chilled water from the safety chilled water system (SCWS). The humidifier is supplied with water from the potable and sanitary water system (PSWS). The relative humidity in the rooms is controlled by modulation of the humidifiers.

The air conditioning system for the CRE area operates in the recirculation mode with fresh air makeup. The fresh air flow rate corresponds to the exhaust of kitchens and sanitary rooms and the leakage rate in the CRE area due to controlled overpressure. The exhaust from the kitchen and sanitary rooms is directed to the electrical division of the SB ventilation system (SBVSE) air outlet duct (refer to Section 9.4.6).

Air Supply and Recirculation Subsystem

The air supply and recirculation subsystem is illustrated in Figure 9.4.1-3— CRE Air Supply and Recirculation Subsystem.

The common supply air plenum (one in the SB division two and one in the SB division three) provides conditioned air to the CRE areas through the ductwork distribution network. Electric air heaters are installed in the supply air ducts to maintain individual room temperatures. The exhaust air from the CRE area, except the exhaust from kitchen and sanitary rooms, is recirculated through the recirculation air handling units. The exhaust from kitchen and sanitary rooms is separated from the recirculated return air and is processed separately through the SBVSE.

9.4.1.2.2 Component Description

The major components of the CRACS are listed below, along with the applicable codes and standards. Refer to Section 3.2 for the seismic and system quality group classification of these components.

Ductwork and Accessories

The main supply and exhaust air shafts are constructed of concrete with painted surfaces. The air supply and exhaust duct branches for each area are fed from the main supply and exhaust air shafts. These ducts are constructed of galvanized sheet steel and are structurally designed for fan shutoff pressures. The ductwork meets the design, testing and construction requirements per ASME AG- 1-2003 (Reference 1).

Electric Heaters

The electric heaters are installed in the supply duct to maintain room ambient conditions. These are controlled by local room temperature sensors and control circuits. The heaters meet the requirements of Reference 1.

Filter Air Heaters

Filter air heaters are located upstream of iodine filtration units to prevent excessive moisture accumulation in the carbon filter beds. The heaters meet the requirements of Reference 1.

Prefilters

The prefilters are located upstream of the HEPA filters and collect large particles to increase the useful life of the high efficiency filters. The prefilters meet the requirements of ANSI/ASHRAE Standard 52.2-1999 (Reference 2).

HEPA Filters

HEPA filters are constructed, qualified and tested in accordance with Reference 1. The periodic inplace testing of HEPA filters to determine the leak tightness is performed per ASME N510-1989 (Reference 3).

Adsorbers

Carbon filters are used to remove radioactive iodine from the supply of fresh and recirculated air. The efficiency of removal of methyl iodine is based on the decontamination efficiency assigned during the laboratory tests. The periodic inplace testing of adsorbers to determine the leak tightness is performed per Reference 3.

Fans

The supply and exhaust fans are centrifugal or axial type with electric motor drivers. Fan performance is rated in accordance with ANSI/AMCA-210-99 (Reference 4), ANSI/AMCA-211-1987 (Reference 5) and ANSI/AMCA-300-1985 (Reference 6).

Isolation dampers

Manual dampers are adjusted during initial plant startup testing to establish accurate air flow balance between the rooms. The motor-operated dampers will fail to "close" or "open" position in case of power loss, depending on the safety function of the damper. The performance and testing requirements of the dampers are per Reference 1.

Fire Dampers

Fire dampers are installed where ductwork penetrates a fire barrier. Fire damper design meets the requirements of UL 555 (Reference 7) and the damper fire rating is commensurate with the fire rating of the barrier penetrated.

Cooling Coils and Moisture Separator

The cooling coils are of the finned tube, coil type and are connected to the safety chilled water system (SCWS). The cooling coils are designed in accordance with Reference 1. The moisture separator collects condensate which is directed to the drain system.

Humidifier

Humidifiers are installed to restore ambient humidity conditions as required for each area. Humidity levels are maintained in all areas within the acceptable range defined in the design basis. The humidifier is supplied with water from the PSWS. The relative humidity in the rooms is controlled by modulation of the humidifiers.

9.4.1.2.3 System Operation

Normal Plant Operation

During normal plant operation, fresh air is admitted via two of four air intake trains. The fresh air passes through two auto-opened isolation dampers and is heated by electric heaters depending on the fresh air temperature. The fresh air passes through a prefilter, and then mixes with the recirculated air from the CRE area.

The fresh and recirculated air is admitted through two of four air handling units which provide heating, cooling and humidity control of the supply air. The conditioned air is then distributed through a ductwork distribution network to the CRE area. The room air conditioning is provided by the supply and exhaust air flows based on minimum air renewal rate, equipment and personnel heat loads and heat balance between the rooms.

Heating of air streams is provided by electric heaters located in the supply air ducts. The operation of heaters is automatically controlled by the temperature sensors located in the corresponding rooms.

The CRE area is maintained at a pressure above atmospheric pressure to provide habitability in the event of radioactive or toxic contamination of the environment.

Both iodine filtration trains are secured and fully bypassed with the motorized inlet dampers in the auto-closed position during normal plant operation.

The air conditioning system for the CRE area operates in the recirculation mode with fresh air makeup. During the recirculation mode, the fresh air supply rate is equal to the rate of exhaust air from the kitchens and sanitary rooms plus accounting for the leakage rate in the area due to controlled overpressure. The four fresh air intake trains are not cross-connected; therefore, the air intake in operation corresponds to the recirculation train in operation.

Exhaust air from the kitchen and sanitary rooms is not recirculated. The exhaust air is directed by a separate exhaust duct and exhaust fans to the SBVSE air outlet duct.

Abnormal Operating Conditions

Redundancy of air supply and air conditioning trains is provided. A loss of function or power to any single train or component does not affect overall system operation. The train separation and independent power source limit common mode failure of active multiple trains and abnormal operating conditions.

Loss of a single cooling train will not result in a loss of system functional capability because four cooling trains are provided. The iodine filtration trains do not operate during normal plant operation, but loss of a single iodine filtration train during any design basis accident will not result in a loss of iodine filtration capability because two iodine filtration trains are provided.

L[During a toxic gas accident event, the CRAGS is placed in full recirculation mode without any outside air makeup (refer to Section 6.4.2.2).]

Loss of Offsite Power

During loss of offsite power (LOOP), the air intake and recirculation air handling electrical components located inside SB division two receive power for one train from the emergency diesel generators (EDG) of division two, and for the other train from the EDGs of division one. The electrical components located inside the SB division

three receive power on one train from the EDGs of division three, and for the other train from the EDGs of division four. The humidity is not controlled during this event.

During LOOP, the iodine filtration train electrical components located inside the SB division two receive power from the EDGs of division one. The electrical components located inside the SB division three receive power from the EDGs of division four.

Station Blackout

- In the event of station blackout (SBO), the electrical components which receive power from the EDG of division one are backed-up by alternate **AC** (AAC) power from the SBO diesel generators (SBODG) of division one. The electrical components which receive power from the EDG of division four are backed up by the AAC power from the SBODGs of division four.
- In the event of a simultaneous SBO and site radiological event, the CRE area is isolated and CRACS is maintained in a full recirculation mode through the iodine filtration train until site power is restored or EDGs are started. Power restoration is assumed to occur within eight hours following the occurrence of a SBO event.

Loss of Ultimate Heat Sink

The conditioned air supply is cooled by chilled water provided by the SGWS. Two water-cooled chillers are located in SB divisions two and three, and two air-cooled chillers are located in SB divisions one and four. In case of loss of ultimate heat sink (LUHS), the water-cooled chillers are not available. The safety chilled water is then supplied by air-cooled chillers which provide the cooling function for the filtration trains located in divisions one and four, which also include both iodine filtration trains. The cooling function for the filtration trains in divisions two and three is not available.

Operation During Radiological Site Contamination

During a site radiological contamination event, the fresh air supply is automatically redirected through the iodine filtration trains, instead of the normal intake air supply, by closing and opening the associated dampers. When one iodine filtration train operates, the outside fresh airflow rate of 1000 cfm and CRE recirculation airflow rate of 3000 cfm (a total flow rate of 4000 cfm) provides an unlimited stay by the CRE personnel.

Exhaust from the kitchen and sanitary rooms is stopped and all other exhaust air is recirculated.

The operation of CRAGS creates an overpressure of 0.125 inches water gauge as a minimum inside the GRE area with respect to the surrounding area, which limits unfiltered incoming air leakage into these areas.

[fOperation During a Toxic Gas Event

Outside air is continuously monitored for toxic gas by the toxic gas sensors located at the air intakes. Upon detection of a toxic gas condition, audible and visual alarms are actuated in the MCR.]]

Operation during External Fire, Smoke i[or *Toxic Gas Releasell*

In the event of an external fire, [[external toxic gas release,]] smoke, or excessive concentration of CO and $CO₂$, outside air to the CRACS is isolated manually or automatically and the system operates in full recirculation mode without fresh air.

9.4.1.3 Safety Evaluation

The CRACS is designed to maintain ambient conditions inside the CRE area for personnel comfort and to allow safe operation of the equipment during normal plant operation, outages, and under all anticipated occurrences including postulated accidental events (refer to Section 15.0.3 for a discussion of radiological consequences).

The CRAGS keeps the CRE area at a positive pressure of 0.125 inches water gauge at a minimum with respect to the surrounding area to provide habitability in the event of radioactive contamination of the environment, and to prevent uncontrolled incoming air leakage.

During a site radiological contamination event, the fresh air intake is redirected through the iodine filtration trains. The CRAGS also can be operated in full recirculation mode without fresh air during abnormal operation or postulated accident events.

Redundancy for air cooling and iodine filtration is provided by multiple independent trains for critical functions. Sufficient redundancy is provided for proper operation of the system when one active component is out of service.

In case of fire in any room within the CRE area, the room air supply and exhaust are isolated by fire dampers and, if necessary, the plant is controlled by the remote shutdown station (RSS). The four air conditioning trains are installed in four different fire zones. Two of these zones contain the two iodine filtration trains.

Capability for withstanding or coping with an SBO event is met by the design of the AAC power source satisfying the ten minutes criteria; that is, the AAC power source can be started from the MCR within ten minutes after the onset of an SBO event. The **AAC** diesel generators are designed to operate for a minimum of twenty-four hours with available onsite fuel supplies.

9.4.1.4 Inspection and Testing Requirements

Refer to Section 14.2 (test abstracts #082 and #203) for initial plant testing. Initial inplace acceptance testing of the CRACS components is performed in accordance with Reference 1 and Reference 3.

Periodic testing will be performed to verify the unfiltered in-leakage into the CRE area per RG 1.197.

Refer to Section 16 (SR 3.7.10 and SR 3.7.11) for surveillance requirements.

9.4.1.5 Instrumentation Requirements

Indication of the operational status of the equipment, position of dampers, and instrument indications and alarms are provided in the MCR. Fans, motor-operated dampers, heaters and cooling units are operable from the MCR. Local instruments are provided to monitor flow, temperature and pressure. The fire detection and sensor information are delivered to the fire detection system (refer to Section 9.5.1).

The minimum instrumentation, indication and alarms for ESF filter systems are provided in Table 9.4.1-1--Minimum Instrumentation, Indication, and Alarm Features for ESF Filter Systems.

9.4.1.6 References

- 1. ASME AG-1-2003, "Code on Nuclear Air and Gas Treatment," The American Society of Mechanical Engineers, 2003 [including the AG-la, 2004 Addenda].
- 2. ANSI/ASHRAE Standard 52.2-1999, "Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size," American Society of Heating, Refrigerating and Air Conditioning Engineers, 1999.
- 3. ASME N510-1989 (R1995), "Testing of Nuclear Air-Treatment Systems," The American Society of Mechanical Engineers, 1989.
- 4. ANSI/AMCA-210-99, "Laboratory Methods of Testing Fans for Aerodynamic Performance Rating," American National Standards Institute/AMCA, December 1999.
- 5. ANSI/AMCA 211-1987, "Certified Ratings Program-Air Performance," American National Standards Institute/AMCA, 1987.
- 6. ANSI/AMCA-300-1985, "Reverberant Room Method of Testing Fans for Rating Purposes," American National Standards Institute/AMCA, 1985.
- 7. UL 555, "Standard for Fire Dampers," Underwriter's Laboratories, Sixth Edition, June 1999.

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Table 9.4.1-1-Minimum Instrumentation, Indication, and Alarm Features for **ESF** Filter Systems

Figure 9.4.1-1-Control Room Air Intake and Iodine Filtration Train Subsystems

U.S. EPR FINAL SAFETY ANALYSIS REPORT

– POTABLE AND SANITARY WATER DISTRIBUTION SYSTEM
– NUCLEAR ISLAND DRAIN AND VENT SYSTEM
– SAFETY CHILLED WATER SYSTEM
– MAIN CONTROL ROOM AIR CONDITIONING SYSTEM CKB
KTE
OKA
SAB

SAB02T2

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DOHA 305481 DIVISION 2 - IODINE FILTRATION TRAIN 11 $\begin{picture}(180,10) \put(0,0){\line(1,0){10}} \put(10,0){\line(1,0){10}} \put(10,0){\line($ F $\sqrt{\epsilon}$ 雦 \rightarrow SH 2 (A) PRE-FLIR $\frac{1}{305AB01}$ \bigcap DIVISION 2 - AIR INTAKE TRAIN 01 DIVISION 2

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AT001 雦 $\overline{5H2(8)}$ $\frac{1}{\frac{305AB02}{AB001}}$ 305AB02 DIVISION 2 - AIR INTAKE TRAIN 02

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Figure 9.4.1-2-Control Room Recirculation Air Handling Subsystem

[[TG-Toxic Gas Sensors]]

U.S. EPR FINAL SAFETY ANALYSIS REPORT

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MAIN CONTROL ROOM AIR CONDITIONING SYSTEM

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SABO1T2

Figure 9.4.1-3-Control Room Envelope Air Supply and Recirculation Subsystem

CONTROL ROOM ENVELOPE (CRE)

U.S. EPR FINAL SAFETY ANALYSIS REPORT

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 SAC KITCHEN AND SANITARY EXHAUST TO
ELECTRICAL DIVISION OF SAFEGUARD
BUILDING VENTILATION SYSTEM (SBVSE)

SAB - MAIN CONTROL ROOM AIR CONDITIONING SYSTE

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SAB03T2

3.7 PLANT SYSTEMS

3.7.10 Control Room Emergency Filtration (CREF)

LCO 3.7.10 Two CREF trains shall be OPERABLE.

-- NOTE The control room envelope (CRE) may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, 4, 5, and 6, During movement of irradiated fuel assemblies.

ACTIONS

5.5 Programs and Manuals

5.5.15 Containment Leakage Rate Testing Program (continued)

e. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

--------------------- REVIEWER'S NOTE **--** As discussed in FSAR Section 6.2.6, the U.S. EPR has no penetrations that are classified as bypass leakage paths.

5.5.16 Battery Monitoring and Maintenance Program

This Program provides for battery restoration and maintenance, based on the recommendations of IEEE Standard 450-2002, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer including the following:

- a. Actions to restore battery cells with float voltage < 2.13 V, and
- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plate.

5.5.17 Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Filtration System (CREFS), CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, [[hazardous chemical release,]] or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary;
- b. Requirements for maintaining CRE boundary in its design condition including configuration control and preventive maintenance;

5.5 Programs and Manuals

5.5.17 Control Room Envelope Habitability Program (continued)

- c. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections **C.1** and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0;
- d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization MODE of operation by one train of the CREFS, operating at the flow rate required by the VFTP, at a Frequency of 24 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the 24 month assessment of the CRE boundary;
- e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in Specification 5.5.17.c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for [[hazardous chemicals orl] smoke must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis; and
- **f.** The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and measuring CRE pressure and assessing the CRE boundary as required by Specifications 5.5.17.c and 5.5.17.d, respectively.

B 3.7 PLANT SYSTEMS

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B 3.7.10 Control Room Emergency Filtration (CREF)

BASES BACKGROUND The CREF provides a protected environment from which occupants can control the unit following an uncontrolled release of radioactivity, [[hazardous chemicals,]] or smoke. The CREF consists of two 100% capacity iodine filtration trains which operate when radioactive contamination is detected at the site or inside the control room envelope (CRE) area. The iodine filtration train is a bypass path of the fresh air intake train for the Control Room Air Conditioning System (CRACS) normal air supply. The air from CRE can also be recirculated through the CREF Iodine Filtration trains. The iodine filtration trains are provided as bypass lines on two of the four normal CRACS air intake trains; other two CRACS intake trains do not have the bypass iodine filtration trains. During an emergency, the fresh outside air and recirculated air are directed through air intake motorized damper and electric heater through the CREF Iodine Filtration train. Each iodine filtration train consists of motorized damper, electric heater, prefilter, upstream HEPA filter, an activated carbon iodine filter, downstream HEPA filter, booster fan, and manual isolation damper. The filtered and clean air is then directed through one or both CRACS normal 75% capacity air conditioning train. Each air conditioning train consists of volume control manual damper, cooling coil, moisture separator, fan suction and discharge silencers, supply air fan, HEPA filter, steam humidifier, non-return damper, volume control electric damper, and fire dampers. The conditioned and clean air is then supplied to the CRE areas. Electric heaters are installed in the CRE supply air ducts to maintain individual room temperatures and relative humidity. The exhaust air from the CRE areas is directed through the recirculation air shaft and then recycled either through the iodine filtration trains or CRACS air conditioning trains. The exhaust from kitchen and sanitary areas is separated from the recycle return air and processed separately. The prefilters remove any large particles in the air, and any entrained water droplets present, to prevent excessive loading of the HEPA filters

and carbon adsorbers. The HEPA filter bank downstream of the carbon iodine filter collects carbon fines and provides backup in case of failure of the upstream HEPA filter bank. Continuous operation of each train for at least 10 hours per month, with the heaters on, reduces moisture buildup on the HEPA filters and carbon adsorbers.

BACKGROUND (continued)

The CRE is the area within the confines of the CRE boundary that contains the spaces that control room occupants inhabit to control the unit during normal and accident conditions. This area encompasses the control room, and may encompass other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident. The CRE is protected during normal operation, natural events, and accident conditions. The CRE boundary is the combination of walls, floor, roof, ducting, doors, penetrations and equipment that physically form the CRE. The OPERABILITY of the CRE boundary must be maintained to ensure that the inleakage of unfiltered air into the CRE will not exceed the inleakage assumed in the licensing basis analysis of design basis accident (DBA) consequences to CRE occupants. The CRE and its boundary are defined in the Control Room Envelope Habitability Program.

The CREF train is an emergency system, which may also operate during normal unit operations in the standby mode of operation. Upon receipt of the actuating signal(s), the outside fresh air supply to the CRE is isolated, and the outside air is directed through the CREF train. The CRE ventilation air is recycled through the air conditioning filter trains and/or CREF train.

Actuation of the CREF places the system in either of two separate states (emergency radiation state or toxic gas isolation state) of the emergency mode of operation, depending on the initiation signal. Actuation of the system to the emergency radiation state of the emergency mode of operation, closes the unfiltered outside air intake and unfiltered exhaust dampers, and aligns the system for recirculation of the air within the CRE through the CREF trains. The emergency radiation state also maintains control room pressurization and filtered ventilation of the air supply to the CRE.

Outside makeup air is supplied through the iodine filtration train and added to the air being recirculated from the CRE. Pressurization of the CRE minimizes infiltration of unfiltered air through the CRE boundary from all the surrounding areas adjacent to the CRE boundary. The actions taken in the toxic gas isolation state are the same, except that the signal switches the CREF to an isolation alignment to minimize any outside air from entering the CRE through the CRE boundary.

The outside air entering the CRE is continuously monitored by radiation [[and toxic gas]] detectors. One detector output above the setpoint will cause actuation of the emergency radiation state or toxic gas isolation state, as required. The actions of the toxic gas isolation state are more restrictive, and will override the actions of the emergency radiation state.

BACKGROUND (continued)

One CREF operating at a flow rate of < 4000 cfm will pressurize the CRE $to \geq 0.125$ inches water gauge relative to all external areas adjacent to the CRE boundary. The CREF operation in maintaining the CRE habitability is discussed in FSAR Section 9.4.1 (Ref. 1).

Redundant supply and recirculation trains provide the required filtration should an excessive pressure drop develop across one of the other filter trains. Normally open isolation dampers are arranged in series so the failure of one damper to shut will not result in a breach of isolation. The CREF train components are designed in accordance with Seismic Category I requirements.

The CREF is designed to maintain a habitable environment in the CRE for 30 days of continuous occupancy after a postulated accident without exceeding a 5 rem whole body dose or its equivalent to any part of the body 5 rem total effective does-dose equivalent (TEDE).

APPLICABLE The CREF components are arranged in redundant, safety related SAFETY ventilation trains. The location of components and ducting within the ANALYSES CRE ensures an adequate supply of filtered air to all areas requiring access. The CREF provides airborne radiological protection for the CRE occupants, as demonstrated by the CRE occupant dose analyses for the most limiting design basis loss of coolant accident, fission product release presented in Chapter 15 (Ref. 2).

> The CREF consists of two 100% capacity iodine filtration trains. Each iodine filtration train can be aligned with one of the two 75% capacity air conditioning trains. There are only two iodine filtration trains since only slow failure modes are assumed and filtration efficiency is checked periodically. Both CREF trains with the associated air conditioning trains are required to be OPERABLE. One CREF train is assumed to be lost to a single failure. The other train provides 100% of the ventilation to the CRE.

The CREF provides protection from smoke *[[and hazardous chemicals to* the CRE occupants. Reference 3 discusses protection of CRE occupants following a hazardous chemical release]]. Reference 4 discusses protection of the CRE occupants and their ability to control the reactor from the control room or from the remote shutdown panels in the event of a smoke challenge.

APPLICABLE SAFETY ANALYSES (continued)

The worst case single active failure of a component of the CREF, assuming a loss of offsite power, does not impair the ability of the system to perform its design function.

The CREF satisfies Criterion 3 of 10 CFR 50.36(d)(2)(ii).

LCO In the event of a postulated accident, one iodine filtration train is required to provide an adequate supply of filtered air to the CRE. To ensure that this requirement is met, both CREF trains must be OPERABLE. The basis for this approach is that two trains are required to satisfy all design requirements (i.e., one train is needed to mitigate the event and other train is assumed to have a single active failure). The failure of both iodine filtration trains could result in exceeding a dose of 5 rem whole body or its equivalent to any part of the body 5 rem TEDE in the event of a large radioactive release.

> Each CREF train is considered OPERABLE when the individual components necessary to limit CRE occupant exposure are OPERABLE. A CREF train is OPERABLE when the associated:

- a. Fan is OPERABLE;
- b. Prefilters, HEPA filters, and carbon adsorbers are not excessively restricting flow, and are capable of performing their filtration functions; and
- c. Heater, ductwork, and dampers are OPERABLE, and air circulation can be maintained.

In order for the CREF trains to be considered OPERABLE, the CRE boundary must be maintained such that the CRE occupant dose from a large radioactive release does not exceed the calculated dose in the licensing basis consequence analyses for postulated accidents, and that CRE occupants are protected from [[hazardous chemicals and]l smoke.

The LCO is modified by a Note allowing the CRE boundary to be opened intermittently under administrative controls. This Note only applies to openings in the CRE boundary that can be rapidly restored to the design conditions, such as doors, hatches, floor plugs, and access panels. For entry and exit through doors, the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls should be procedurelized, and consist of

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ACTIONS (continued)

consequences, and that CRE occupants are protected from J[hazardous chemicals and]fsmoke. These mitigating actions (i.e., actions that are taken to offset the consequences of the inoperable CRE boundary) should be preplanned for implementation upon entry into the condition, regardless of whether entry is intentional or unintentional. The 24 hour Completion Time is reasonable based on the low probability of a postulated accident occurring during this time period, and the use of mitigating actions. The 90 day Completion Time is reasonable based on the determination that the mitigating actions will ensure protection of CRE occupants within analyzed limits while limiting the probability that CRE occupants will have to implement protective measures that may adversely affect their ability to control the reactor and maintain it in a safe shutdown condition in the event of a postulated accident. In addition, the 90 day Completion Time is a reasonable time to diagnose, plan and possibly repair, and test most problems with the CRE boundary.

C.1 and C.2

In MODE 1, 2, 3, or 4, if any Required Action and Completion Time of Condition A or B cannot be met, the unit must be placed in a MODE that minimizes accident risk. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 5 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner.

D.1 and D.2

In MODE 5 or 6, or during movement of irradiated fuel assemblies, if the inoperable CREF train cannot be restored to OPERABLE status within the required Completion Time, action must be taken to immediately place the OPERABLE CREF train in the emergency mode. This action ensures that the other train is OPERABLE, that no failures preventing automatic actuation will occur, and that any active failure would be readily detected.

An alternative to Required Action D.1 is to immediately suspend activities that could result in a release of radioactivity that might require isolation of the CRE. This places the unit in a condition that minimizes risk. This does not preclude the movement of fuel to a safe position.

Required Action D.1 is modified by a Note indicating to place the system in the toxic gas isolation state with outside air isolated.

ACTIONS (continued)

$E.1$

In MODE 5 or 6, or during movement of irradiated fuel assemblies, with two CREF trains inoperable, action must be taken immediately to suspend activities that could result in a release of radioactivity that might enter the CRE. This places the unit in a condition that minimizes accident risk. This does not preclude the movement of fuel to a safe position.

F. **1**

With both Iodine Filtration trains and associated Air Conditioning trains inoperable in MODE 1, 2, 3, or 4 for reasons other than an inoperable CRE boundary (i.e., Condition B), the CREF may not be capable of performing the intended function and the unit is in a condition outside the accident analyses. Therefore, LCO 3.0.3 must be entered immediately.

SURVEILLANCE SR 3.7.10.1 REQUIREMENTS

Standby systems should be checked periodically to ensure that they function properly. As the environment and normal operating conditions on this system are not too severe, testing each train once every month provides an adequate check of this system. Monthly heater operations which dry out any moisture accumulated in the carbon from humidity in the ambient air should be performed. Each Iodine filtration train must be operated for \geq 15 minutes with the heaters energized. The 31 day Frequency is based on the reliability of the equipment and the two train redundancy.

SR 3.7.10.2

This SR verifies that the required CREF train testing is performed in accordance with the Ventilation Filter Testing Program (VFTP). The VFTP includes testing the performance of the HEPA filter, carbon adsorber efficiency, minimum flow rate, and the physical properties of the activated carbon. Specific test Frequencies and additional information are discussed in detail in the VFTP.

SURVEILLANCE REQUIREMENTS (continued)

SR 3.7.10.3

This SR verifies that each CREF train starts and operates on an actual or simulated actuation signal. The Frequency of 24 months is based on industry operating experience and is consistent with the typical refueling cycle.

SR 3.7.10.4

This SR verifies the OPERABILITY of the CRE boundary by testing for unfiltered air inleakage past the CRE boundary and into the CRE. The details of the testing are specified in the Control Room Envelope Habitability Program.

The CRE is considered habitable when the radiological dose to CRE occupants calculated in the licensing basis analyses of postulated accident consequences is no more than 5 rem whole body or its equivalent to any part of the body 5 rem TEDE and the CRE occupants are protected from [[hazardous chemicals and]]smoke. This SR verifies that the unfiltered air inleakage into the CRE is no greater than the flow rate assumed in the licensing basis analyses of postulated accident consequences. When unfiltered air inleakage is greater than the assumed flow rate, Condition B must be entered. Required Action B.3 allows time to restore the CRE boundary to OPERABLE status provided mitigating actions can ensure that the CRE remains within the licensing basis habitability limits for the occupants following an accident. Mitigating actions, or compensatory measures, are discussed in Regulatory Guide 1.196, Section 2.7.3, (Ref. 5) which endorses, with exceptions, NEI 99-03, Section 8.4 and Appendix F (Ref. 6). These compensatory measures may also be used as mitigating measures as required by Required Action B.2. Temporary analytical methods may also be used as compensatory measures (Ref. 7). Options for restoring the CRE boundary to OPERABLE status include changing the licensing basis postulated accident consequence analysis, repairing the CRE boundary, or a combination of these actions. Depending upon the nature of the problem and the corrective action, a full scope inleakage test may not be necessary to establish that the CRE boundary has been restored to OPERABLE status.

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REFERENCES 1. FSAR Section 9.4. 2. Chapter 15. 3. FSAR Section 6.4. 4. FSAR Section 9.5. 5. Regulatory Guide 1.196. 6. NEI 99-03, "Control Room Habitability Assessment," March 2003. 7. Letter from Eric J. Leeds (NRC) to James W. Davis **(NEI)** dated January 30, 2005, "NEI Draft White Paper, Use of Generic Letter 91-18 Process and Alternative Source Terms in the Context of Control Room Habitability" (ADAMS Accession No. ML040300694).

ACTIONS (continued)

B. **1**

-------------------------- REVIEWER'S NOTE **-------------------------------** Adoption of Condition B is dependent on a commitment from the licensee to have guidance available describing compensatory measures to be taken in the event of an intentional and unintentional entry into Condition B.

If the safeguard buildings or fuel building boundary is inoperable in MODE 1, 2, 3, or 4, the SBVS trains may not be able to perform their intended functions. Actions must be taken to restore an OPERABLE safeguard buildings and fuel building boundaries within 24 hours. During the period that the safeguard buildings or fuel building boundary is inoperable, appropriate compensatory measures consistent with the intent, as applicable, of GDC 19 and 10 CFR Part 100 should be utilized to protect plant personnel from potential hazards such as radioactive contamination, [[toxic chemicals,llsmoke, temperature and relative humidity, and physical security. Preplanned measures should be available to address these concerns for intentional and unintentional entry into the condition. The 24 hour Completion Time is reasonable based on the low probability of a postulated accident occurring during this time period, and the use of compensatory measures. The 24 hour Completion Time is a typically reasonable time to diagnose, plan and possibly repair, and test most problems with the safeguard buildings or fuel building boundary.

C.1 and C.2

In MODE 1, 2, 3, or 4, when Required Action A.1 or B.1 cannot be completed within the associated Completion Time, or when both SBVS Accident Exhaust Filtration trains are inoperable for reasons other than an inoperable safeguard building or fuel building boundary (i.e., Condition B), the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in MODE 3 within 6 hours and in MODE 5 within 36 hours. The Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.