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Your ref: Docket No. 52-006
Our ref: DCP_NRC_003137

February 21, 2011

Subject: Chapter 15 Wording Update on Offsite Doses

Westinghouse is submitting an update to the wording in DCD Chapter 15. This response is submitted in support of the AP1000 Design Certification Amendment Application (Docket No. 52-006). The information included in this response is generic and is expected to apply to all COL applications referencing the AP1000 Design Certification and the AP1000 Design Certification Amendment Application.

The attached DCD markup pages update Chapter 15 to provide the previously discussed offsite dose information. A conforming change to Chapter 2 is also included. These DCD markups attached have been reviewed and it was agreed that they are acceptable for inclusion into Revision 19

Questions or requests for additional information related to the content and preparation of this response should be directed to Westinghouse. Please send copies of such questions or requests to the prospective applicants for combined licenses referencing the AP1000 Design Certification. A representative for each applicant is included on the cc: list of this letter.

Very truly yours,

S. E. Ritterbusch for

R. F. Ziesing
Director, U.S. Licensing

/Enclosure

1. Markup of DCD Revision 18, Chapter 15 and Chapter 2

D063
NRO

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ENCLOSURE 1

Markup of DCD Revision 18, Chapter 15 and Chapter 2

15.1.5.4.6 Doses

Using the assumptions from Table 15.1.5-1, the calculated total effective dose equivalent (TEDE) doses for the case with accident-initiated iodine spike are determined to be less than 0.6 rem at the site boundary for the limiting 2-hour interval (0 to 2 hours) and 1.1 rem at the low population zone outer boundary. These doses are small fractions of the dose guideline of 25 rem TEDE identified in 10 CFR Part 50.34. A "small fraction" is defined, consistent with the Standard Review Plan, as being 10 percent or less. The TEDE doses for the case with pre-existing iodine spike are determined to be less than 0.5 rem at the site boundary for the limiting 2-hour interval (0 to 2 hours) and 0.4 rem at the low population zone outer boundary. These doses are within the dose guidelines of 10 CFR Part 50.34.

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At the time the main steam line break occurs, the potential exists for a coincident loss of spent fuel pool cooling with the result that the pool could reach boiling and a portion of the radioactive iodine in the spent fuel pool could be released to the environment. The loss of spent fuel pool cooling has been evaluated for a duration of 30 days. There is no contribution to the 2-hour site boundary dose because the pool boiling would not occur until after the first 2 hours. The 30-day contribution to the dose at the low population zone boundary is less than 0.01 rem TEDE. When this is added to the dose calculated for the main steam line break, the resulting total dose remains less than the values reported above.

15.1.6 Inadvertent Operation of the PRHR Heat Exchanger

15.1.6.1 Identification of Causes and Accident Description

The inadvertent actuation of the PRHR heat exchanger causes an injection of relatively cold water into the reactor coolant system. This produces a reactivity insertion in the presence of a negative moderator temperature coefficient. To prevent this reactivity increase from causing reactor power increase, a reactor trip is initiated when either PRHR discharge valve comes off of its fully shut seat.

The inadvertent actuation of the PRHR heat exchanger could be caused by operator error or a false actuation signal, or by malfunction of a discharge valve. Actuation of the PRHR heat exchanger involves opening one of the isolation valves, which establishes a flow path from one reactor coolant system hot leg, through the PRHR heat exchanger, and back into its associated steam generator cold leg plenum.

The PRHR heat exchanger is located above the core to promote natural circulation flow when the reactor coolant pumps are not operating. With the reactor coolant pumps in operation, flow through the PRHR heat exchanger is enhanced. The heat sink for the PRHR heat exchanger is provided by the IRWST, in which the PRHR heat exchanger is submerged. Because the fluid in the heat exchanger is in thermal equilibrium with water in the tank, the initial flow out of the PRHR heat exchanger is significantly colder than the reactor coolant system fluid. Following this initial insurge, the reduction in cold leg temperature is limited by the cooling capability of the PRHR heat exchanger. Because the PRHR heat exchanger is connected to only one reactor coolant system loop, the cooldown resulting from its actuation is asymmetric with respect to the core.

15.3.3.3.6 Doses

Using the assumptions from Table 15.3-3, the calculated total effective dose equivalent (TEDE) doses are determined to be less than 0.5 rem at the exclusion area boundary for the limiting 2-hour interval (0 to 2 hours) and less than 0.2 rem at the low population zone outer boundary for the scenario in which there is no feedwater available to maintain water level in the steam generators. The doses for the scenario in which it is assumed that water level in the steam generators is maintained are 0.4 rem at the exclusion area boundary for the limiting 2-hour interval of 6 to 8 hours and 0.4 rem at the low population zone outer boundary. These doses are a small fraction of the dose guideline of 25 rem TEDE identified in 10 CFR Part 50.34. A "small fraction" is identified as 10 percent or less consistent with the Standard Review Plan (Reference 4).

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At the time the locked reactor coolant pump rotor event occurs, the potential exists for a coincident loss of spent fuel pool cooling with the result that the pool could reach boiling and a portion of the radioactive iodine in the spent fuel pool could be released to the environment. The loss of spent fuel pool cooling has been evaluated for a duration of 30 days. There is no contribution to the 2-hour site boundary dose because the pool boiling would not occur until after the first 2 hours. The 30-day contribution to the dose at the low population zone boundary is less than 0.01 rem TEDE, and when this is added to the dose calculated for the locked rotor event, the resulting total dose remains less than the value reported above.

15.3.4 Reactor Coolant Pump Shaft Break

15.3.4.1 Identification of Causes and Accident Description

The accident is postulated as an instantaneous failure of a reactor coolant pump shaft. Flow through the affected reactor coolant loop is rapidly reduced, though the initial rate of reduction of coolant flow is greater for the reactor coolant pump rotor seizure event. Reactor trip occurs on a low-flow signal in the affected loop.

Following the reactor trip, heat stored in the fuel rods continues to be transferred to the coolant, causing the coolant to expand. At the same time, heat transfer to the shell side of the steam generator in the faulted loop is reduced because: 1) the reduced flow results in a decreased tube-side film coefficient, and 2) the reactor coolant in the tubes cools down while the shell-side temperature increases. (Turbine steam flow is reduced to 0 upon plant trip.) The rapid expansion of the coolant in the reactor core, combined with reduced heat transfer in the steam generators, causes an insurge into the pressurizer and a pressure increase throughout the reactor coolant system. The insurge into the pressurizer compresses the steam volume, actuates the automatic spray system, and opens the pressurizer safety valves, in that sequence. For conservatism, the pressure-reducing effect of the spray is not included in the analysis.

This event is classified as a Condition IV incident (limiting fault), as defined in subsection 15.0.1.

15.3.4.2 Conclusion

With a failed shaft, the impeller could be free to spin in a reverse direction as opposed to being fixed in position as is the case when a locked rotor occurs. This results in a decrease in the end point (steady-state) core flow. For both the shaft break and locked rotor incidents, reactor trip

- The leakage from containment is assumed to continue for a full 30 days. It is expected that containment pressure is reduced to the point that leakage is negligible before this time.

15.4.8.3.6 Doses

Using the assumptions from Table 15.4-4, the calculated total effective dose equivalent (TEDE) doses are determined to be less than 1.8 rem at the site boundary for the limiting 2-hour interval (0 to 2 hours) and less than 2.5 rem at the low population zone outer boundary. These doses are well within the dose guideline of 25 rem total effective dose equivalent identified in 10 CFR Part 50.34. The phrase "well within" is taken as being 25 percent or less.

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At the time the rod ejection accident occurs, the potential exists for a coincident loss of spent fuel pool cooling with the result that the pool could reach boiling and a portion of the radioactive iodine in the spent fuel pool could be released to the environment. The loss of spent fuel pool cooling has been evaluated for a duration of 30 days. There is no contribution to the 2-hour site boundary dose because the pool boiling would not occur until after the first 2 hours. The 30-day contribution to the dose at the low population zone boundary is less than 0.01 rem TEDE, and when this is added to the dose calculated for the rod ejection accident, the resulting total dose remains less than the value reported above.

15.4.9 Combined License Information

This section has no requirement for additional information to be provided in support of the Combined License application.

15.4.10 References

1. Barry, R. F., and Risher, D. H., Jr., "TWINKLE--A Multi-Dimensional Neutron Kinetics Computer Code," WCAP-7979-P-A (Proprietary) and WCAP-8028-A (Nonproprietary), January 1975.

2. Hargrove, H. G., "FACTRAN--A FORTRAN-IV Code for Thermal Transients in a UO_2 Fuel Rod," WCAP-7908-A, December 1989.

3. Burnett. T. W. T., et al., "LOFTRAN Code Description," WCAP-7907-P-A (Proprietary) and WCAP-7907-A (Nonproprietary), April 1984.

4. Risher, D. H., Jr., "An Evaluation of the Rod Ejection Accident in Westinghouse Pressurized Water Reactors Using Spatial Kinetics Methods," WCAP-7588, Revision 1A, January 1975.

5. Taxelius, T. G., ed, "Annual Report-SPERT Project, October 1968, September 1969," Idaho Nuclear Corporation, IN-1370, June 1970.

6. Liimataninen, R. C., and Testa, F. J., "Studies in TREAT of Zircaloy-2-Clad, UO_2-Core Simulated Fuel Elements," ANL-7225, January-June 1966, p 177, November 1966.

7. Davidson, S. L., (Ed.), et al., "ANC: A Westinghouse Advanced Nodal Computer Code," WCAP-10965-P-A (Proprietary) and WCAP-10966-A (Nonproprietary), September 1986.

The sample line includes a flow restrictor at the point of sample to limit the break flow to less than 130 gpm. The liquid sampling lines are 1/4 inch tubing which further restricts the break flow of a sampling line outside containment. Offsite doses are based on a conservative break flow of 130 gpm with isolation after 30 minutes.

15.6.2.1 Source Term

The only significant radionuclide releases are the iodines and the noble gases. The analysis assumes that the reactor coolant iodine is at the maximum Technical Specification level for continuous operation. In addition, it is assumed that an iodine spike occurs at the time of the accident. The reactor coolant noble gas activities are assumed to be those associated with the design basis fuel defect level.

15.6.2.2 Release Pathway

The reactor coolant that is spilled from the break is assumed to be at high temperature and pressure. A large portion of the flow flashes to steam, and the iodine in the flashed liquid is assumed to become airborne.

The iodine and noble gases are assumed to be released directly to the environment with no credit for depletion, although a large fraction of the airborne iodine is expected to deposit on building surfaces. No credit is assumed for radioactive decay after release.

15.6.2.3 Dose Calculation Models

The models used to calculate doses are provided in Appendix 15A.

15.6.2.4 Analytical Assumptions and Parameters

The assumptions and parameters used in the analysis are listed in Table 15.6.2-1.

15.6.2.5 Identification of Conservatisms

The assumptions used contain the following significant conservatisms:

- The reactor coolant activities are based on a fuel defect level of 0.25 percent; whereas, the expected fuel defect level is far less than this (see Section 11.1).
- It is unlikely that the conservatively selected meteorological conditions would be present at the time of the accident.

15.6.2.6 Doses

Using the assumptions from Table 15.6.2-1, the calculated total effective dose equivalent (TEDE) doses are determined to be < 1.1 rem at the exclusion area boundary and < 0.5 rem at the low population zone outer boundary. These doses are a small fraction of the dose guideline of 25 rem TEDE identified in 10 CFR Part 50.34. The phrase "a small fraction" is taken as being ten percent or less.

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At the time the accident occurs, there is the potential for a coincident loss of spent fuel pool cooling with the result that the pool could reach boiling and a portion of the radioactive iodine in the spent fuel pool could be released to the environment. The loss of spent fuel pool cooling has been evaluated for a duration of 30 days. There is no contribution to the 2-hour site boundary dose because pool boiling would not occur until after 2 hours. The 30-day contribution to the dose at the low population zone boundary is less than 0.01 rem TEDE and, when this is added to the dose calculated for the small line break outside containment, the resulting total dose remains less than the value reported above.

15.6.3 Steam Generator Tube Rupture

15.6.3.1 Identification of Cause and Accident Description

15.6.3.1.1 Introduction

The accident examined is the complete severance of a single steam generator tube. The accident is assumed to take place at power with the reactor coolant contaminated with fission products corresponding to continuous operation with a limited number of defective fuel rods within the allowance of the Technical Specifications. The accident leads to an increase in contamination of the secondary system due to leakage of radioactive coolant from the reactor coolant system. In the event of a coincident loss of offsite power, or a failure of the condenser steam dump, discharge of radioactivity to the atmosphere takes place via the steam generator power-operated relief valves or the safety valves.

The assumption of a complete tube severance is conservative because the steam generator tube material (Alloy 690) is a corrosion-resistant and ductile material. The more probable mode of tube failure is one or more smaller leaks of undetermined origin. Activity in the secondary side is subject to continual surveillance, and an accumulation of such leaks, which exceeds the limits established in the Technical Specifications, is not permitted during operation.

The AP1000 design provides automatic protective actions to mitigate the consequences of an SGTR. The automatic actions include reactor trip, actuation of the passive residual heat removal (PRHR) heat exchanger, initiation of core makeup tank flow, termination of pressurizer heater operation, and isolation of chemical and volume control system flow and startup feedwater flow on high-2 steam generator level or high steam generator level coincident with reactor trip (P-4). These protective actions result in automatic cooldown and depressurization of the reactor coolant system, termination of the break flow and release of steam to the atmosphere, and long-term maintenance of stable conditions in the reactor coolant system. These protection systems serve to prevent steam generator overfill (see discussion in subsections 15.6.3.1.2 and 15.6.3.1.3) and to maintain offsite radiation doses within the allowable guideline values for a design basis SGTR. The operator may take actions that would provide a more rapid mitigation of the consequences of an SGTR.

Because of the series of alarms described next, the operator can readily determine when an SGTR occurs, identify and isolate the ruptured steam generator, and complete the required recovery actions to stabilize the plant and terminate the primary-to-secondary break flow. The recovery procedures are completed on a time scale that terminates break flow to the secondary system

15.6.3.3.5 Identification of Conservatisms

The assumptions used in the analysis contain a number of significant conservatisms, such as:

- The reactor coolant activities are based on a fuel defect level of 0.25 percent; whereas, the expected fuel defect level is far less (see Section 11.1).

- It is unlikely that the conservatively selected meteorological conditions are present at the time of the accident.

15.6.3.3.6 Doses

Using the assumptions from Table 15.6.3-3, the calculated TEDE doses for the case in which the iodine spike is assumed to be initiated by the accident are determined to be less than 0.6 rem at the exclusion area boundary for the limiting 2-hour interval (0-2 hours) and less than 0.5 rem at the low population zone outer boundary. These doses are a small fraction of the dose guideline of 25 rem TEDE identified in 10 CFR Part 50.34. A "small fraction" is defined, consistent with the Standard Review Plan, as being ten percent or less.

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For the case in which the SGTR is assumed to occur coincident with a pre-existing iodine spike, the TEDE doses are determined to be less than 1.4 rem at the exclusion area boundary for the limiting 2-hour interval (0 to 2 hours) and less than 0.7 rem at the low population zone outer boundary. These doses are within the dose guideline of 25 rem TEDE identified in 10 CFR Part 50.34.

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At the time the accident occurs, there is the potential for a coincident loss of spent fuel pool cooling with the result that the pool could reach boiling and a portion of the radioactive iodine in the spent fuel pool could be released to the environment. The loss of spent fuel pool cooling has been evaluated for a duration of 30 days. There is no contribution to the 2-hour exclusion area boundary dose because pool boiling would not occur until after 2.0 hours. The 30-day contribution to the dose at the low population zone boundary is less than 0.01 rem TEDE and, when this is added to the doses calculated for the steam generator tube rupture, the resulting total doses remain as reported above.

15.6.3.4 Conclusions

The results of the SGTR analysis show that the overfill protection logic and the passive system design features provide protection to prevent steam generator overfill. Following an SGTR accident, the operators can identify and isolate the ruptured steam generator and complete the required actions to terminate the primary-to-secondary break flow before steam generator overfill or ADS actuation occurs.

Even when no operator actions are assumed, the AP1000 protection system and passive design features initiate automatic actions that can terminate a steam generator tube leak and stabilize the reactor coolant system in a safe condition while preventing steam generator overfill and ADS actuation.

15.7.4.4.8 Time Available for Radioactive Decay

The dose analysis assumes that the fuel handling accident involves one of the first fuel assemblies handled. If it were one of the later fuel handling operations, there is additional decay and a reduction in the source term.

The dose evaluation was performed assuming 48 hours decay.

15.7.4.5 Offsite Doses

Using the assumptions from Table 15.7-1, the calculated doses from the initial releases are determined to be 2.7 rem TEDE at the site boundary and 1.2 rem TEDE at the low population zone outer boundary. These doses are well within the dose guideline of 25 rem TEDE identified in 10 CFR Part 50.34. The phrase "well within" is taken as meaning 25 percent or less.

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15.7.5 Spent Fuel Cask Drop Accident

The spent fuel cask handling crane is prevented from travelling over the spent fuel. No radiological consequences analysis is necessary for the dropped cask event.

15.7.6 Combined License Information

Combined License applicant referencing the AP1000 certified design will perform an analysis of the consequences of potential release of radioactivity to the environment due to a liquid tank failure as outlined in subsection 15.7.3.

15.7.7 References

1. Sofer, L., et al., "Accident Source Terms for Light-Water Nuclear Power Plants," NUREG-1465, February 1995.

2. U. S. NRC Regulatory Guide 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors, " July 2000.

Table 15A-5

OFFSITE ATMOSPHERIC DISPERSION FACTORS (χ/Q) FOR ACCIDENT DOSE ANALYSIS

Site boundary χ/Q (s/m³)	
0 – 2 hours[1]	5.1×10^{-4}
Low population zone χ/Q (s/m³)	
0 – 8 hours	2.2×10^{-4}
8 – 24 hours	1.6×10^{-4}
24 – 96 hours	1.0×10^{-4}
96 – 720 hours	8.0×10^{-5}

Notes:

1. Nominally defined as the 0- to 2-hour interval, but is applied to the 2-hour interval having the highest activity releases in order to address 10 CFR Part 50.34 requirements

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Table 15A-6

CONTROL ROOM ATMOSPHERIC DISPERSION FACTORS (χ/Q) FOR ACCIDENT DOSE ANALYSIS

χ/Q (s/m^3) at HVAC Intake for the Identified Release Points(1)						
	Plant Vent or PCS Air Diffuser(3)	**Ground Level Containment Release Points(4)**	**PORV and Safety Valve Releases(5)**	**Steam Line Break Releases**	**Fuel Handling Area(6)**	**Condenser Air Removal Stack(7)**
0 – 2 hours	3.0E-3	6.0E-3	2.0E-2	2.4E-2	6.0E-3	6.0E-3
2 – 8 hours	2.5E-3	3.6E-3	1.8E-2	2.0E-2	4.0E-3	4.0E-3
8 – 24 hours	1.0E-3	1.4E-3	7.0E-3	7.5E-3	2.0E-3	2.0E-3
1 – 4 days	8.0E-4	1.8E-3	5.0E-3	5.5E-3	1.5E-3	1.5E-3
4 – 30 days	6.0E-4	1.5E-3	4.5E-3	5.0E-3	1.0E-3	1.0E-3

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χ/Q (s/m^3) at Annex Building Door for the Identified Release Points(2)						
.	**Plant Vent or PCS Air Diffuser(3)**	**Ground Level Containment Release Points(4)**	**PORV and Safety Valve Releases(5)**	**Steam Line Break Releases**	**Fuel Handling Area(6)**	**Condenser Air Removal Stack(7)**
0 – 2 hours	1.0E-3	1.0E-3	4.0E-3	4.0E-3	6.0E-3	2.0E-2
2 – 8 hours	7.5E-4	7.5E-4	3.2E-3	3.2E-3	4.0E-3	1.8E-2
8 – 24 hours	3.5E-4	3.5E-4	1.2E-3	1.2E-3	2.0E-3	7.0E-3
1 – 4 days	2.8E-4	2.8E-4	1.0E-3	1.0E-3	1.5E-3	5.0E-3
4 – 30 days	2.5E-4	2.5E-4	8.0E-4	8.0E-4	1.0E-3	4.5E-3

Notes:

1. These dispersion factors are to be used 1) for the time period preceding the isolation of the main control room and actuation of the emergency habitability system, 2) for the time after 72 hours when the compressed air supply in the emergency habitability system would be exhausted and outside air would be drawn into the main control room, and 3) for the determination of control room doses when the non-safety ventilation system is assumed to remain operable such that the emergency habitability system is not actuated.
2. These dispersion factors are to be used when the emergency habitability system is in operation and the only path for outside air to enter the main control room is that due to ingress/egress.
3. These dispersion factors are used for analysis of the doses due to a postulated small line break outside of containment. The plant vent and PCS air diffuser are potential release paths for other postulated events (loss-of-coolant accident, rod ejection accident, and fuel handling accident inside the containment); however, the values are bounded by the dispersion factors for ground level releases.
4. The listed values represent modeling the containment shell as a diffuse area source, and are used for evaluating the doses in the main control room for a loss-of-coolant accident, for the containment leakage of activity following a rod ejection accident, and for a fuel handling accident occurring inside the containment.

5. The listed values bound the dispersion factors for releases from the steam line safety & power-operated relief valves. These dispersion factors would be used for evaluating the doses in the main control room for a steam generator tube rupture, a main steam line break, a locked reactor coolant pump rotor, and for the secondary side release from a rod ejection accident.
6. The listed values bound the dispersion factors for releases from the fuel storage and handling area. The listed values also bound the dispersion factors for releases from the fuel storage area in the event that spent fuel boiling occurs and the fuel building relief panel opens on high temperature. These dispersion factors are used for the fuel handling accident occurring outside containment and for evaluating the impact of releases associated with spent fuel pool boiling.
7. This release point is included for information only as a potential activity release point. None of the design basis accident radiological consequences analyses model release from this point.

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Table 2-1 (Sheet 4 of 4) SITE PARAMETERS						
Control Room Atmospheric Dispersion Factors (χ /Q) for Accident Dose Analysis						
χ/Q (s/m3) at HVAC Intake for the Identified Release Points(1)						
	Plant Vent or PCS Air Diffuser(3)	**Ground Level Containment Release Points(4)**	**PORV and Safety Valve Releases(5)**	**Steam Line Break Releases**	**Fuel Handling Area(6)**	**Condenser Air Removal Stack(7)**
0 - 2 hours	3.0E-3	6.0E-3	2.0E-2	2.4E-2	6.0E-3	6.0E-3
2 - 8 hours	2.5E-3	3.6E-3	1.8E-2	2.0E-2	4.0E-3	4.0E-3
8 - 24 hours	1.0E-3	1.4E-3	7.0E-3	7.5E-3	2.0E-3	2.0E-3
1 - 4 days	8.0E-4	1.8E-3	5.0E-3	5.5E-3	1.5E-3	1.5E-3
4 - 30 days	6.0E-4	1.5E-3	4.5E-3	5.0E-3	1.0E-3	1.0E-3
χ/Q (s/m³) at Annex Building Door for the Identified Release Points(2)						
	Plant Vent or PCS Air Diffuser(3)	**Ground Level Containment Release Points(4)**	**PORV and Safety Valve Releases(5)**	**Steam Line Break Releases**	**Fuel Handling Area(6)**	**Condenser Air Removal Stack(7)**
0 - 2 hours	1.0E-3	1.0E-3	4.0E-3	4.0E-3	6.0E-3	2.0E-2
2 - 8 hours	7.5E-4	7.5E-4	3.2E-3	3.2E-3	4.0E-3	1.8E-2
8 - 24 hours	3.5E-4	3.5E-4	1.2E-3	1.2E-3	2.0E-3	7.0E-3
1 - 4 days	2.8E-4	2.8E-4	1.0E-3	1.0E-3	1.5E-3	5.0E-3
4 - 30 days	2.5E-4	2.5E-4	8.0E-4	8.0E-4	1.0E-3	4.5E-3

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<u>Notes:</u>

1. These dispersion factors are to be used 1) for the time period preceding the isolation of the main control room and actuation of the emergency habitability system, 2) for the time after 72 hours when the compressed air supply in the emergency habitability system would be exhausted and outside air would be drawn into the main control room, and 3) for the determination of control room doses when the non-safety ventilation system is assumed to remain operable such that the emergency habitability system is not actuated.
2. These dispersion factors are to be used when the emergency habitability system is in operation and the only path for outside air to enter the main control room is that due to ingress/egress.
3. These dispersion factors are used for analysis of the doses due to a postulated small line break outside of containment. The plant vent and PCS air diffuser are potential release paths for other postulated events (loss-of-coolant accident, rod ejection accident, and fuel handling accident inside the containment); however, the values are bounded by the dispersion factors for ground level releases.

4. The listed values represent modeling the containment shell as a diffuse area source, and are used for evaluating the doses in the main control room for a loss-of-coolant accident, for the containment leakage of activity following a rod ejection accident, and for a fuel handling accident occurring inside the containment.
5. The listed values bound the dispersion factors for releases from the steam line safety & power-operated relief valves. These dispersion factors would be used for evaluating the doses in the main control room for a steam generator tube rupture, a main steam line break, a locked reactor coolant pump rotor, and for the secondary side release from a rod ejection accident.
6. The listed values bound the dispersion factors for releases from the fuel storage and handling area. The listed values also bound the dispersion factors for releases from the fuel storage area in the event that spent fuel boiling occurs and the fuel building relief panel opens on high temperature. These dispersion factors are used for the fuel handling accident occurring outside containment and for evaluating the impact of releases associated with spent fuel pool boiling.
7. This release point is included for information only as a potential activity release point. None of the design basis accident radiological consequences analyses model release from this point.

Comment [tlw2]: 23

Deleted: 8. . The LOCA dose analysis models the ground level containment release point HVAC intake atmospheric dispersion factors. Other analyses model more conservative values.