# 15.7 Radioactive Release from a Subsystem or Component

This group of events includes the following:

- Gas waste management system leak or failure
- Liquid waste management system leak or failure (atmospheric release)
- Release of radioactivity to the environment via liquid pathways
- Fuel handling accident
- Spent fuel cask drop accident

# 15.7.1 Gas Waste Management System Leak or Failure

The AP1000 gaseous radwaste system is a low-pressure, low-flow charcoal delay process. Failure of the gaseous radwaste system results in a minor release of activity that is not significant. The Standard Review Plan no longer includes this event as part of the review. Therefore, no analysis is provided.

# 15.7.2 Liquid Waste Management System Leak or Failure (Atmospheric Release)

The AP1000 liquid radwaste system tanks do not contain significant levels of gaseous activity because liquids expected to contain gaseous radioactivity are processed by a gas stripper before being directed to storage. The tanks are open to the atmosphere so that any evolution of gaseous activity is continually released through the monitored plant vent. The Standard Review Plan no longer includes this event as part of the review. Therefore, no analysis is provided.

# 15.7.3 Release of Radioactivity to the Environment Due to a Liquid Tank Failure

Tanks containing radioactive fluids are located inside plant structures.

In the event of a tank failure, the liquid would be drained by the floor drains to the auxiliary building sump. From the sump, the water would be directed to the waste holdup tank. The basemat of the auxiliary building is 6-feet thick, the exterior walls are 3-feet thick, and the building is seismic Category I. The exterior walls are sealed to prevent leakage. Thus, it is assumed that there is no release of the spilled liquid waste to the environment. However, the Standard Review Plan states that credit cannot be taken for liquid retention by unlined building foundations. Analysis of the impact of this event will be performed as discussed in subsection 15.7.6. This analysis should include consideration of tank liquid level, processing and decay of tank contents, potential paths of spilled waste to the environment, as well as other pertinent factors.

# 15.7.4 Fuel Handling Accident

A fuel handling accident can be postulated to occur either inside the containment or in the fuel handling area inside the auxiliary building. The fuel handling accident is defined as the dropping of a spent fuel assembly such that every rod in the dropped assembly has its cladding breached so that the activity in the fuel/cladding gap is released.

The possibility of a fuel handling accident is remote because of the many administrative controls and the equipment operating limits that are incorporated in the fuel handling operations (see subsection 9.1.4). Only one spent fuel assembly is lifted at a time, and the fuel is moved at low speeds, exercising caution that the fuel assembly not strike anything during movement. The containment, auxiliary building, refueling pool, and spent fuel pool are designed to seismic Category I requirements to thus provide their integrity in the event of a safe shutdown earthquake. The spent fuel storage racks are located to prevent a credible external missile from reaching the stored fuel assemblies. The fuel handling equipment is designed to prevent the handling equipment from falling onto the fuel in the reactor vessel or that stored in the spent fuel pool. The facility is designed so that heavy objects, such as the spent fuel shipping cask, cannot be carried over or tipped into the spent fuel pool.

#### **15.7.4.1 Source Term**

The inventory of fission products available for release at the time of the accident is dependent on a number of factors, such as the power history of the fuel assembly, the time delay between reactor shutdown and the beginning of fuel handling operations, and the volatility of the nuclides.

The fuel handling accident source term is derived from the core source term detailed in Appendix 15A by taking into account the factors below. The assumptions used to define the fuel handling accident initial airborne release source term are provided in Table 15.7-1 along with the derived source term.

# 15.7.4.1.1 Fission Product Gap Fraction

During power operation, a portion of the fission products generated in the fuel pellet matrix diffuses into the fuel/cladding gap. The fraction of the assembly fission products found in the gap depends on the rate of diffusion for the nuclide in question as well as the rate of radioactive decay. In the event of a fuel handling accident, the gaseous and volatile radionuclides contained in the fuel/cladding gap are free to escape from the fuel assembly. The radionuclides of concern are the noble gases (kryptons and xenons) and iodines. Based on NUREG-1465 (Reference 1), the fission product gap fraction is 3-percent of fuel inventory. For this analysis, the gap fractions are increased to be consistent with the guidance of Regulatory Guide 1.183 (Reference 2). The gap fractions are listed in Table 15.7-1.

### 15.7.4.1.2 Iodine Chemical Form

Consistent with NUREG-1465 guidance, the iodine released from the damaged fuel rods is assumed to be 95-percent cesium iodide, 4.85-percent elemental iodine, and 0.15-percent organic iodine.

Cesium iodide is nonvolatile, and the iodine in this form dissolves in water but does not readily become airborne. However, consistent with the guidance in Regulatory Guide 1.183, it is assumed that the cesium iodide is instantaneously converted to the elemental form when released from the fuel into the low pH water pool.

# 15.7.4.1.3 Assembly Power Level

All fuel assemblies are assumed to be handled inside the containment during the core shuffle so a peak power assembly is considered for the accident. Any fuel assembly can be transferred to the spent fuel pool; during a core off-load, all fuel assemblies are discharged to the spent fuel pool. To obtain a bounding condition for the fuel handling accident analysis, it is assumed that the accident involves a fuel assembly that operated at the maximum rated fuel rod peaking factor. This is conservative because the entire fuel assembly does not operate at this level.

# 15.7.4.1.4 Radiological Decay

The fission product decay time experienced prior to the fuel handling accident is at least 48 hours.

# 15.7.4.2 Release Pathways

The spent fuel handling operations take place underwater. Thus, activity releases are first scrubbed by the column of water 23 feet in depth. This has no effect on the releases of noble gases or organic iodine but there is a significant removal of elemental iodine. Consistent with the guidance in Regulatory Guide 1.183, the overall pool scrubbing decontamination factor for iodine is assumed to be 200

After the activity escapes from the water pool, it is assumed that it is released directly to the environment within a 2-hour period without credit for any additional iodine removal process.

If the fuel handling accident occurs in the containment, the release of activity can be terminated by closure of the containment purge lines on detection of high radioactivity. No credit is taken for this in the analysis. Additionally, no credit is taken for removal of airborne iodine by the filters in the containment purge lines.

For the fuel handling accident postulated to occur in the spent fuel pool, there is assumed to be no filtration in the release pathway. Activity released from the pool is assumed to pass directly to the environment with no credit for holdup or delay of release in the building.

#### 15.7.4.3 Dose Calculation Models

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

Table 15.7-1 lists the assumptions used in the analysis. The guidance of Regulatory Guide 1.183 is reflected in the analysis assumptions.

#### 15.7.4.4 Identification of Conservatisms

The fuel handling accident dose analysis assumptions contain a number of conservatisms. Some of these conservatisms are described in the following subsections.

# 15.7.4.4.1 Fuel Assembly Power Level

The source term is based on the assumption that all of the fuel rods in the damaged assembly have been operating at the maximum fuel rod radial peaking factor. In actuality, this is true for only a small fraction of the fuel rods in any assembly. The overall assembly power level is less than the maximum radial peaking factor.

#### 15.7.4.4.2 Fission Product Gap Fraction

The assumption of Regulatory Guide 1.183 gap fractions for the short-lived nuclides is conservative by a factor of 2 or more, depending on the nuclide.

# 15.7.4.4.3 Amount of Fuel Damage

It is assumed that all fuel rods in a fuel assembly are damaged so as to release the fission product inventory in the fuel/cladding gap. In an actual fuel handling accident, it is expected that there would be few rods damaged to this extent.

#### 15.7.4.4.4 Iodine Plateout on Fuel Cladding

Although it is expected that virtually all elemental iodine plates out on the fuel cladding and is unavailable for atmospheric release, no credit is taken for plateout.

#### 15.7.4.4.5 Presence of Organic Iodine

Although 0.15% of the iodine is assumed to be in the organic form (and thus not subject to scrubbing removal in the water pool), there would be no organic iodine in the fuel rods. Any formation of organic iodine would occur gradually and would not contribute to early releases of activity.

#### 15.7.4.4.6 Conversion of Cesium Iodide to Form Elemental Iodine

The analysis assumes that all of the cesium iodide converts immediately to the elemental iodine form after release to the water pool and is treated in the same manner as the iodine initially in the elemental form. While the low pH solution does support conversion to the elemental form, the conversion would not occur unless the cesium iodide was dissolved in the water. The elemental iodine that is formed would thus be in the water solution and not in the bubbles of gas released from the damaged fuel. Additionally, conversion of cesium iodide would occur slowly and the elemental iodine formed would not be immediately available for release.

#### **15.7.4.4.7 Meteorology**

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

# 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.

# 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

- Sofer, L., et al., "Accident Source Terms for Light-Water Nuclear Power Plants," NUREG-1465, February 1995.
- U. S. NRC Regulatory Guide 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," July 2000.

Table 15.7-1	
ASSUMPTIONS USED TO DETERMINE FUEL HANDLING ACCIDENT RADIOLOGICAL CONSEQUENCES	
Source term assumptions	
<ul><li>Core power (MWt)</li></ul>	3468 <sup>(1)</sup>
<ul><li>Decay time (hr)</li></ul>	48
Core source term after 48 hours decay (Ci)	
I-130 I-131 I-132 I-133 I-135 Kr-85m Kr-85 Kr-88 Xe-131m Xe-133m Xe-135m Xe-135	2.49 E+05 8.26 E+07 9.27 E+07 4.11 E+07 1.21 E+06 1.59 E+04 1.05 E+06 5.81 E+02 1.05 E+06 4.37 E+06 1.69 E+08 1.94 E+05 1.08 E+07
Number of fuel assemblies in core	157
Amount of fuel damage	One assembly
Maximum rod radial peaking factor	1.65
Percentage of fission products in gap	
I-131	8
Other iodines	5
Kr-85	10
Other noble gases	5
Pool decontamination factor for iodine	200
Activity release period (hr)	2
Atmospheric dispersion factors	See Table 15A-5 in Appendix 15A
Breathing rates (m³/sec)	3.5 E-4
Nuclide data	See Appendix 15A

Note:

1. The main feedwater flow measurement supports a 1-percent power uncertainty; use of a 2-percent power uncertainty is conservative.