

ATTACHMENT 2

Letter from C.R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

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Proposed Amendment 143a

Affected TS Pages:

TS 3.8-1

TS 3.8-2

TS 3.8-3

TS B3.8-1

TS B3.8-2

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3.8 REFUELING OPERATIONS

APPLICABILITY

Applies to operating limitations during REFUELING OPERATIONS.

OBJECTIVE

To ensure that no incident occurs during REFUELING OPERATIONS that would affect public health and safety.

SPECIFICATION

a. During REFUELING OPERATIONS:

1. Containment Closure

- a. The equipment hatch shall be closed and at least one door in each personnel air lock shall be capable of being closed⁽¹⁾ in 30 minutes or less. In addition, at least one door in each personnel air lock shall be closed when the reactor vessel head or upper internals are lifted.
 - b. Each line that penetrates containment and which provides a direct air path from containment atmosphere to the outside atmosphere shall have a closed isolation valve or an operable automatic isolation valve.
2. Radiation levels in fuel handling areas, the containment and the spent fuel storage pool shall be monitored continuously.
 3. The reactor will be subcritical for 100 hours prior to movement of its irradiated fuel assemblies. Core subcritical neutron flux shall be continuously monitored by at least TWO neutron monitors, each with continuous visual indication in the control room and ONE with audible indication in the containment whenever core geometry is being changed. When core geometry is not being changed at least ONE neutron flux monitor shall be in service.
 4. At least ONE residual heat removal pump shall be operable.

(1) Administrative controls ensure that:

- Appropriate personnel are aware that both personnel air lock doors are open,
- A specified individual(s) is designated and available to close the air lock following a required evacuation of containment, and
- Any obstruction(s) (e.g., cables and hoses) that could prevent closure of an open air lock can be quickly removed.

5. When there is fuel in the reactor, a minimum boron concentration of 2100 ppm and a shutdown margin of $\geq 5\% \Delta k/k$ shall be maintained in the Reactor Coolant System during reactor vessel head removal or while loading and unloading fuel from the reactor. The required boron concentration shall be verified by chemical analysis daily.
6. Direct communication between the control room and the operating floor of the containment shall be available whenever changes in core geometry are taking place.
7. Heavy loads, greater than the weight of a fuel assembly, will not be transported over or placed in either spent fuel pool when spent fuel is stored in that pool. Placement of additional fuel storage racks is permitted, however, these racks may not traverse directly above spent fuel stored in the pools.
8. The containment ventilation and purge system, including the capability to initiate automatic containment ventilation isolation, shall be tested and verified to be operable immediately prior to and daily during REFUELING OPERATIONS.
9.
 - a. The spent fuel pool sweep system, including the charcoal adsorbers, shall be operating during fuel handling and when any load is carried over the pool if irradiated fuel in the pool has decayed less than 30 days. If the spent fuel pool sweep system, including the charcoal adsorber, is not operating when required, fuel movement shall not be started (any fuel assembly movement in progress may be completed).
 - b. Performance Requirements
 1. The results of the in-place cold DOP and halogenated hydrocarbon tests at design flows on HEPA filters and charcoal adsorber banks shall show $\geq 99\%$ DOP removal and $\geq 99\%$ halogenated hydrocarbon removal.
 2. The results of laboratory carbon sample analysis from spent fuel pool sweep system carbon shall show $\geq 90\%$ radioactive methyl iodide removal at conditions of 66°C and 95% RH.
 3. Fans shall operate within $\pm 10\%$ of design flow when tested.
10. The minimum water level above the vessel flange shall be maintained at 23 feet.
11. A dead-load test shall be successfully performed on both the fuel handling and manipulator cranes before fuel movement begins. The load assumed by the cranes for this test must be equal to or greater than the maximum load to be assumed by the cranes during the REFUELING OPERATIONS. A thorough visual inspection of the cranes shall be made after the dead-load test and prior to fuel handling.

12. A licensed senior reactor operator will be on-site and designated in charge of the REFUELING OPERATIONS.
- b. If any of the specified limiting conditions for REFUELING OPERATIONS are not met, refueling of the reactor shall cease. Work shall be initiated to correct the violated conditions so that the specified limits are met, and no operations which may increase the reactivity of the core shall be performed.

BASIS

The equipment and general procedures to be utilized during REFUELING OPERATIONS are discussed in the USAR. Detailed instructions, the above specified precautions, and the design of the fuel handling equipment incorporating built-in interlocks and safety features, provide assurance that no incident occurs during the REFUELING OPERATIONS that would result in a hazard to public health and safety.⁽¹⁾ Whenever changes are not being made in core geometry, one flux monitor is sufficient. This permits maintenance of the instrumentation. Continuous monitoring of radiation levels (TS 3.8.a.2) and neutron flux provides immediate indication of an unsafe condition. The residual heat removal pump is used to maintain a uniform boron concentration.

A minimum shutdown margin of greater than or equal to 5% $\Delta k/k$ must be maintained in the core. A boron concentration of 2100 ppm, as required by TS 3.8.a.5, is sufficient to ensure an adequate margin of safety. The specification for REFUELING OPERATIONS shutdown margin is based on a dilution during refueling accident⁽²⁾. With an initial shutdown margin of 5% $\Delta k/k$, under the postulated accident conditions, it will take approximately 61 minutes for the reactor to go critical. This is ample time for the operator to recognize the audible high count rate signal, and isolate the reactor makeup water system. Periodic checks of refueling water boron concentration ensure that proper shutdown margin is maintained. Specification 3.8.a.6 allows the control room operator to inform the manipulator operator of any impending unsafe condition detected from the main control board indicators during fuel movement.

Interlocks are utilized during REFUELING OPERATIONS to ensure safe handling. Only one assembly at a time can be handled. The fuel handling hoist is dead weight tested prior to use to assure proper crane operation. It will not be possible to lift or carry heavy objects over the spent fuel pool when fuel is stored therein through interlocks and administrative procedures. Placement of additional spent fuel racks will be controlled by detailed procedures to prevent traverse directly above spent fuel.

The one hundred hour decay time following plant shutdown is consistent with the assumption used in the dose calculation for the fuel handling accident. The requirement for the spent fuel pool sweep system, including charcoal adsorbers, to be operating when spent fuel movement is being made provides added assurance that the off-site doses will be within acceptable limits in the event of a fuel handling accident. The spent fuel pool sweep system is designed to sweep the atmosphere above the refueling pool and release to the Auxiliary Building vent during fuel handling operations. Normally, the charcoal adsorbers are bypassed but for purification operation, the bypass dampers are closed routing the air flow through the charcoal adsorbers. If the dampers do not close tightly, bypass

⁽¹⁾USAR Section 9.5.2

⁽²⁾USAR Section 14.1

leakage could exist to negate the usefulness of the charcoal adsorber. If the spent fuel pool sweep system is found not to be operating, fuel handling within the Auxiliary Building will be terminated until the system can be restored to the operating condition.

The bypass dampers are integral to the filter housing. The test of the bypass leakage around the charcoal adsorbers will include the leakage through these dampers.

High efficiency particulate absolute (HEPA) filters are installed before the charcoal adsorbers to prevent clogging of the iodine adsorbers. The charcoal adsorbers are installed to reduce the potential radioiodine releases to the atmosphere. Bypass leakage for the charcoal adsorbers and particulate removal efficiency for HEPA filters are determined by halogenated hydrocarbon and DOP, respectively. The laboratory carbon sample test results indicate a radioactive methyl iodide removal efficiency under test conditions which are more severe than accident conditions.

Operation of the fans significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers. If the performances are as specified, the calculated doses would be less than the guidelines stated in 10 CFR Part 100 for the accidents analyzed.

The spent fuel pool sweep system will be operated for the first month after reactor is shutdown for refueling during fuel handling and crane operations with loads over the pool. The potential consequences of a postulated fuel handling accident without the system are a very small fraction of the guidelines of 10 CFR Part 100 after one month decay of the spent fuel. Heavy loads greater than one fuel assembly are not allowed over the spent fuel.

In-place testing procedures will be established utilizing applicable sections of ANSI N510 - 1975 standard as a procedural guideline only.

A fuel handling accident in containment does not cause containment pressurization. One containment door in each personnel air lock can be closed following containment personnel evacuation and the containment ventilation and purge system has the capability to initiate automatic containment ventilation isolation to terminate a release path to the atmosphere.

The presence of a licensed senior reactor operator at the site and designated in charge provides qualified supervision of the REFUELING OPERATIONS during changes in core geometry.⁽³⁾

⁽³⁾USAR Section 13.2.1