

## B 3.7 PLANT SYSTEMS

### B 3.7.16 Secondary Specific Activity

#### BASES

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##### BACKGROUND

Activity in the secondary coolant results from steam generator tube leakage from the Reactor Coolant System (RCS). Under steady state conditions, the activity is primarily iodines with relatively short half lives and, thus, indicates current conditions. During transients, I-131 spikes have been observed as well as increased releases of some noble gases. Fission product isotopes and activated corrosion products in lesser amounts may also be found in the secondary coolant when steam generator tube leakage occurs.

A limit on secondary coolant specific activity during power operation minimizes releases to the environment because of normal operation, anticipated operational occurrences, and accidents.

The steam line failure is assumed to result in the release of the noble gas and iodine activity contained in the steam generator inventory, the feedwater, and the reactor coolant LEAKAGE. Most of the iodine isotopes have short half lives, (i.e., < 20 hours). I-131, with a half life of 8.04 days, concentrates faster than it decays, but does not reach equilibrium because of blowdown and other losses.

Operating a unit at the allowable limits will result in a 2 hour EAB exposure of less than a small fraction of the 10 CFR 100 (Ref. 1) limits.

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##### APPLICABLE SAFETY ANALYSES

The accident analysis of the main steam line break (MSLB), as discussed in the UFSAR, Chapter 15 (Ref. 2) assumes the initial secondary coolant specific activity to have a radioactive isotope concentration of 0.10  $\mu\text{Ci/gm}$  DOSE EQUIVALENT I-131. This assumption is used in the analysis for determining the radiological consequences of the postulated accident. The accident analysis, based on this and other assumptions, shows that the radiological consequences of an MSLB do not exceed a small fraction of the unit EAB limits (Ref. 1) for whole body and thyroid dose rates.

With the loss of offsite power, the remaining steam generators are available for core decay heat dissipation by venting steam to the atmosphere through the MSSVs and steam generator power operated relief valves (SG PORVs). The Auxiliary Feedwater

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APPLICABLE SAFETY ANALYSES (continued)

System supplies the necessary makeup to the steam generators. Venting continues until the reactor coolant temperature and pressure have decreased sufficiently for the Residual Heat Removal System to complete the cooldown.

In the evaluation of the radiological consequences of this accident, the activity released from the steam generator connected to the failed steam line is assumed to be released directly to the environment. The unaffected steam generator is assumed to discharge steam and any entrained activity through the MSSVs and SG PORVs during the event. Since no credit is taken in the analysis for activity plateout or retention, the resultant radiological consequences represent a conservative estimate of the potential integrated dose due to the postulated steam line failure.

Secondary specific activity limits satisfy Criterion 2 of 10 CFR 50.36 (Ref. 3).

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LCO

As indicated in the Applicable Safety Analyses, the specific activity of the secondary coolant is required to be  $\leq 0.10 \mu\text{Ci/gm DOSE EQUIVALENT I-131}$  to limit the radiological consequences of a Design Basis Accident (DBA) to a small fraction of the required limit (Ref. 1).

Monitoring the specific activity of the secondary coolant ensures that when secondary specific activity limits are exceeded, appropriate actions are taken in a timely manner to place the unit in an operational MODE that would minimize the radiological consequences of a DBA.

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APPLICABILITY

In MODES 1, 2, 3, and 4, the limits on secondary specific activity apply due to the potential for secondary steam releases to the atmosphere.

In MODES 5 and 6, the steam generators are not being used for heat removal. Both the RCS and steam generators are depressurized, and primary to secondary LEAKAGE is minimal. Therefore, monitoring of secondary specific activity is not required.

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ACTIONS

A.1 and A.2

DOSE EQUIVALENT I-131 exceeding the allowable value in the secondary coolant, is an indication of a problem in the RCS and contributes to increased post accident doses. If the secondary specific activity cannot be restored to within limits within the associated Completion Time, 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 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 and without challenging unit systems.

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SURVEILLANCE  
REQUIREMENTS

SR 3.7.16.1

This SR verifies that the secondary specific activity is within the limits of the accident analysis. A gamma isotopic analysis of the secondary coolant, which determines DOSE EQUIVALENT I-131, confirms the validity of the safety analysis assumptions as to the source terms in post accident releases. It also serves to identify and trend any unusual isotopic concentrations that might indicate changes in reactor coolant activity or LEAKAGE. The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.

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REFERENCES

1. 10 CFR 100.11.
2. UFSAR, Section 15.1.5.
3. 10 CFR 50.36, Technical Specifications, (c)(2)(ii).