



U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NUCLEAR REGULATORY RESEARCH
REGULATORY GUIDE

August 2016
Revision 3
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REGULATORY GUIDE 1.140

(Draft was issued as DG-1280, dated June 2012)

**DESIGN, INSPECTION, AND TESTING CRITERIA FOR AIR
FILTRATION AND ADSORPTION UNITS OF NORMAL
ATMOSPHERE CLEANUP SYSTEMS IN
LIGHT-WATER-COOLED NUCLEAR POWER PLANTS**

A. INTRODUCTION

Purpose

This regulatory guide (RG) describes a method that the staff of the U.S. Nuclear Regulatory Commission (NRC) considers acceptable to implement regulatory requirements with regard to the design, inspection, and testing of normal atmosphere cleanup systems for controlling releases of airborne radioactive materials to the environment during normal operations, including anticipated operational occurrences. This guide applies to all types of nuclear power plants that use water as the primary means of cooling.

Applicability

This RG applies to all holders of and applicants for operating licenses for nuclear power reactors under the provisions of Title 10 of the Code of Federal Regulations (10 CFR) Part 50, “Domestic Licensing of Production and Utilization Facilities” (Ref. 1), and all holders of and applicants for a power reactor combined license, standard design approval, or manufacturing license under 10 CFR Part 52, “Licenses, Certifications, and Approvals for Nuclear Power Plants” (Ref 2).

Applicable Regulations

- Title 10, of the *Code of Federal Regulations*, Part 50, “Domestic Licensing of Production and Utilization Facilities” (10 CFR Part 50) and the associated appendices establish the requirements and design criteria for atmospheric cleanup systems.
 - 10 CFR 50.34a and 50.36a, which relate to information that must be provided by applicants regarding how radioactive dose in effluents will be maintained as low as reasonably achievable (ALARA).

Written suggestions regarding this guide or development of new guides may be submitted through the NRC’s public Web site under the Regulatory Guides document collection of the NRC Library at <http://www.nrc.gov/reading-rm/doc-collections/reg-guides/contactus.html>.

Electronic copies of this RG, previous versions of this guide, and other recently issued guides are available through the NRC’s public Web site under the Regulatory Guides document collection of the NRC Library at <http://www.nrc.gov/reading-rm/doc-collections/>. The regulatory guide is also available through the NRC’s Agencywide Documents Access and Management System (ADAMS) at <http://www.nrc.gov/reading-rm/adams.html>, under ADAMS Accession No. ML16070A277. The regulatory analysis may be found in ADAMS under Accession No. ML16082A538 and the staff responses to the public comments on DG-1280 may be found under ADAMS Accession No. ML16070A279.

- 10 CFR Part 50, Appendix I, "Numerical Guides for Design Objectives and Limiting Conditions for Operation To Meet the Criterion 'As Low As Is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents," which provides numerical guidance on design objectives for light-water-cooled nuclear power reactors to meet the requirements that radioactive material in effluents released to unrestricted areas be kept as low as is reasonably achievable.
- 10 CFR 20.1406, "Minimization of contamination" (Ref. 3), which requires licensees, to the extent practical, to conduct operations to minimize the introduction of residual radioactivity into the site, including the subsurface, and requires applicants to describe in their applications how facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment, facilitate eventual decommissioning, and minimize, to the extent practicable, the generation of radioactive waste.

Related Guidance

- Regulatory Guide 1.52, "Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants" (Ref. 4), provides guidance for the engineered safety feature (ESF) systems.
- RG 1.143, "Design Guidance for Radioactive Waste Management Systems, Structures and Components Installed in Light-Water-Cooled Nuclear Reactor Power Plants" (Ref. 5), describes systems handling of radioactive materials in liquids, gaseous and solid collection systems that include construction of structures.
- RG 4.21, "Minimization of Contamination and Radioactive Waste Generation: Life Cycle Planning" (Ref. 6), gives guidance for design of facilities to minimize contamination of the facility and the environment, and to minimize the generation of waste.
- NUREG-0800 "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition" (Ref. 7), gives NRC review criteria for meeting the requirements of nuclear power plants.

Purpose of Regulatory Guides

The NRC issues RGs to describe to the public methods that the staff considers acceptable for use in implementing specific parts of the agency's regulations, to explain techniques that the staff uses in evaluating specific problems or postulated accidents, and to provide guidance to applicants. Regulatory guides are not substitutes for regulations and compliance with them is not required. Methods and solutions that differ from those set forth in regulatory guides will be deemed acceptable if they provide a basis for the findings required for the issuance or continuance of a permit or license by the Commission.

Paper Reduction Act

This RG contains and references information collections covered by 10 CFR Parts 50 and 52 that are subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). These information collections were approved by the Office of Management and Budget (OMB), control numbers 3150-0011 and 3150-0151.

Public Protection Notification

The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid OMB control number.

B. DISCUSSION

Reason for Revision

This revision of the guide (Revision 3) addresses changes to the referenced industry standards, which provide comprehensive test and inspection requirements. Specifically, this guide is revised to address changes to the referenced industry standards since the NRC issued Revision 2 of RG 1.140 in June 2001. The American Society of Mechanical Engineers (ASME) Committee on Nuclear Air and Gas Treatment (CONAGT) revised and expanded the scope of equipment covered by ASME-AG-1, “Code on Nuclear Air and Gas Treatment” (Ref. 8), which the staff previously endorsed in RG 1.140. The revision to ASME-AG-1b consolidated some requirements from ASME-N509, “Nuclear Power Plant Air Cleaning Units and Components” (Ref. 9); ASME-N510, “Testing of Nuclear Air-Treatment Systems” (Ref. 10); and other documents previously endorsed by the staff in RG 1.140. In addition, CONAGT developed and published a new standard, ASME N511-2007, “Inservice Testing of Nuclear Air Treatment, Heating Ventilation and Air Conditioning Systems” (Ref. 11).

Background

10 CFR Part 50, “Domestic Licensing of Production and Utilization Facilities,” Appendix A, “General Design Criteria for Nuclear Power Plants,” General Design Criterion (GDC) 60, “Control of Releases of Radioactive Materials to the Environment,” requires in part, that a facility’s design include the means to control the release of radioactive materials in gaseous effluents. In addition, GDC 61, “Fuel Storage and Handling and Radioactivity Control,” requires in part, that fuel storage and handling, radioactive waste, and other systems which may contain radioactivity are designed with appropriate containment, confinement, and filtering systems. Title 10 CFR 50.34a, “Design Objectives for Equipment To Control Releases of Radioactive Material in Effluents—Nuclear Power Reactors,” and 10 CFR 50.36a, “Technical Specifications on Effluents from Nuclear Power Reactors,” requires in part, that means be employed to ensure that the release of radioactive material to unrestricted areas during normal reactor operation, including during expected operational occurrences, is kept as low as reasonably achievable.

10 CFR 50.34a and 50.36a provide guidance and numerical values for design objectives to help applicants for new reactors and nuclear power plant license holders meet the requirements of 10 CFR Part 50, Appendix I, “Numerical Guides for Design Objectives and Limiting Conditions for Operation To Meet the Criterion ‘As Low As Is Reasonably Achievable’ (ALARA) for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents.” In addition to complying with the design objectives and ALARA provisions, Section II.D of Appendix I requires that additional radwaste equipment of reasonably demonstrated technology be installed if it results in a reduction of population doses within a 50-mile (80-km) radius from the power plant when added to the system in order of diminishing favorable cost-benefit return. The requirements of this Paragraph D need not be complied with by persons who have filed applications for construction permits which were docketed on or after January 2, 1971, and prior to June 4, 1976, if the radwaste systems and equipment described in the preliminary or final safety analysis report and amendments satisfy the Guides on Design Objectives for Light-Water-Cooled Nuclear Power Reactors proposed in the Concluding Statement of Position of the Regulatory Staff in Docket-RM-50-2 dated February 20, 1974, pp. 25-30, reproduced in the Annex to this Appendix I.

The design of the normal atmosphere cleanup systems of light-water-cooled nuclear power plants includes particulate filtration and radioiodine adsorption units to reduce the quantities of radioactive materials in gaseous effluents released from primary containment or auxiliary building atmospheres during normal operations, including anticipated operational occurrences. These systems operate to meet the “as low as reasonably achievable” requirements of 10 CFR 50.34a and 10 CFR 50.36a. Auxiliary

buildings can include those referred to as the secondary containment building, turbine building, radwaste building, and fuel handling building.

Normal atmospheric cleanup systems are generally designed to operate continuously under normal environmental conditions, such as inlet radioiodine activity levels up to 37 millibecquerels per cubic centimeter (16.4 picocuries per cubic inch), relative humidity up to 100 percent, temperatures up to 52 degrees Celsius (125 degrees Fahrenheit), and normal atmospheric pressure. System design, inspection, and testing anticipates the buildup of radioactive particulates and radioiodine and minimizes consequential degradation of system performance. The ambient environment both within and surrounding the facility may affect the performance of the normal atmosphere cleanup systems. Industrial contaminants and pollutants, as well as temperature and relative humidity, contribute to the aging and weathering of filters and adsorbers and reduce their reliability.

Components of the normal atmosphere cleanup systems are designed for reliable performance under the expected operating conditions. Initial and inservice testing and proper maintenance are also primary factors in ensuring system reliability. Component and system design support and facilitate testing, inspection, and maintenance through built-in layout and accessibility features.

Section FF of ASME AG-1b-2009, provides the terminology and describes the characteristics of adsorbent media. The only adsorbent media discussed in this RG is impregnated activated carbon because it is used nearly to the exclusion of all others by NRC licensees.

In addition to filtration systems used to treat exhausts from containment and auxiliary building atmospheres, cleanup systems are also used to treat process streams from power cycle waste offgas systems. These systems treat radioactive process and effluent streams characterized by the presence of noble gases, radioiodines, and mixtures of hydrogen and oxygen gases. These systems also operate to meet the “as low as reasonably achievable” requirements of 10 CFR 50.34a and 10 CFR 50.36a. The design of treatment systems used in power cycle waste offgas systems are characterized by the presence of hydrogen recombiners, compressors, delay tanks or vessels either empty or containing large amounts of activated carbon (e.g., hundreds of kilograms or thousands of pounds in PWRs or tens of thousands of kilograms/pounds in BWRs).

Harmonization with International Standards

The International Atomic Energy Agency (IAEA) has established a series of safety guides and standards constituting a high level of safety for protecting people and the environment. IAEA safety guides present international good practices and increasingly reflects best practices to help users striving to achieve high levels of safety. Pertinent to this regulatory guide, IAEA Safety Guide NS-G-1.10, “Design of Reactor Containment Systems for Nuclear Power Plants” (Ref. 12), addresses the requirements of management of radionuclides leaking through a containment of Nuclear Power Plants. Additionally, IAEA Safety Guide NS-G-2.7, “Radiation Protection and Radioactive Waste Management in the Operation of Nuclear Power Plants” (Ref. 13), provides recommendations as to how to develop radiation protection programs. IAEA Safety Standard SSR-2/1, “Safety of Nuclear Power Plants: Design” (Ref. 14), addresses controlling the release of radioactive gases into the environment. The NRC has an interest in facilitating the harmonization of standards used domestically and internationally. This RG is consistent with the recommendations and guidance in the IAEA Safety Guides NS-G-1.10, NG-G-2.7 and SSR-2/1.

Documents Discussed in Staff Regulatory Guidance

This RG endorses the use of one or more codes or standards developed by external organizations, and other third party guidance documents. These codes, standards and third party guidance documents may contain references to other codes, standards or third party guidance documents (“secondary references”). If a secondary reference has itself been incorporated by reference into NRC regulations as a requirement, then licensees and applicants must comply with that standard as set forth in the regulation. If the secondary reference has been endorsed in a RG as an acceptable approach for meeting an NRC requirement, then the standard constitutes a method acceptable to the NRC staff for meeting that regulatory requirement as described in the specific RG. If the secondary reference has neither been incorporated by reference into NRC regulations nor endorsed in a RG, then the secondary reference is neither a legally-binding requirement nor a “generic” NRC approved acceptable approach for meeting an NRC requirement. However, licensees and applicants may consider and use the information in the secondary reference, if appropriately justified, consistent with current regulatory practice, and consistent with applicable NRC requirements.

C. STAFF REGULATORY GUIDANCE

This section describes the methods and approves for use industry guidance, with clarifications or exceptions, which the NRC staff considers acceptable to implement regulatory requirements with regard to the design, inspection, and testing of normal atmosphere cleanup systems for controlling releases of airborne radioactive materials to the environment during normal operations, including anticipated operational occurrences.

1. General Design and Testing Criteria

American Society of Mechanical Engineers code, ASME AG-1-2009, including 2010 Addenda 1a and 2011 Addenda 1b (i.e., ASME AG-1b-2009), and ASME N511-2007, provides guidance that is acceptable to the NRC staff for the design, construction, acceptance testing, quality assurance, and inservice testing of normal atmosphere cleanup systems and components. Normal atmosphere cleanup systems designed to ASME N509-2002 (Reaffirmed 2008), (or its earlier versions), and tested to ASME N510-2007, (or its earlier versions), are also considered adequate to protect public health and safety.

2. Environmental Design Criteria

- a. Design of normal atmosphere cleanup systems should be based on the anticipated range of operating parameters of temperature, pressure, relative humidity, and radiation levels during normal plant operations, including anticipated operational occurrences.
- b. Normal atmosphere cleanup system operation should not degrade the operation or capability of any safety system required to operate after a design-basis accident.
- c. Design of normal atmosphere cleanup systems should consider any reasonably expected significant contaminants, such as chemicals, dusts, or other particulate matter that could degrade the systems operation or capability.
- d. For power cycle waste offgas systems relying on activated carbon delay tanks or beds, the above environmental design criteria are deemed applicable, but should be evaluated and applied taking into consideration the system's specific design features.

3. System Design Criteria

Normal atmospheric cleanup systems should be designed in accordance with ASME AG-1b-2009 as modified and supplemented by the following:

- a. Normal atmosphere cleanup systems need not be redundant or designed to seismic Category I requirements, but they should consist of at least the following components:
 - (1) high-efficiency particulate air (HEPA) filters upstream of adsorbers;
 - (2) iodine adsorbers (typically impregnated activated carbon), if iodine removal from the airstream is anticipated;
 - (3) fans;
 - (4) interspersed ducts, dampers, and instrumentation;

- (5) prefilters upstream of HEPA filters, if needed to reduce particulate loading of the HEPA filters and achieve an acceptable service life;
 - (6) postfilters downstream of adsorbers, if needed to retain carbon fines; and
 - (7) heating elements or cooling coils, or both, if necessary to control humidity before filtration.
- b. The volumetric airflow rate of a single filtration unit should be limited to 850 cubic meters (30,000 cubic feet) per minute unless reliable in-place testing can be assured. If a higher flow capacity is needed, consider a system design with multiple, parallel units.
 - c. Normal atmosphere cleanup systems should be provided with instrumentation recommended in Section IA of ASME AG-1b-2009 for monitoring and alarming pertinent airflow rates and pressure drops.
 - d. Normal atmosphere cleanup systems design should limit personnel radiation exposure by incorporation of features that facilitate inspection, testing, and maintenance consistent with the guidance of RG 8.8, "Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable" (Ref. 15).
 - e. Outdoor air intake openings should be equipped with louvers, grills, screens, or similar protective devices to minimize the adverse effects of high winds, rain, snow, ice, and other debris on system operation. Outdoor air intake openings should be located to minimize the effects of onsite sources of contaminants, such as diesel generator exhaust. System design should consider potential airborne contaminants from offsite sources, such as nearby industrial facility discharges of dusts, combustion particulates and gases, dust storms, or salt spray particulate from nearby oceans or bays.
 - f. Normal atmosphere cleanup system housings and ductwork should be designed to limit system total leakage rate, as defined in Article SA-4500 of ASME AG-1b-2009. Duct and housing leak tests should be performed consistent with Section TA of ASME AG-1b-2009.
 - g. For power cycle waste offgas systems relying on activated carbon delay tanks or beds, the above system design criteria are deemed applicable, but should be evaluated and applied taking into consideration the system's specific design features.

4. Component Design Criteria and Qualification Testing

Components of normal atmosphere cleanup systems should be designed, constructed, and tested in accordance with Division II of ASME AG-1b-2009, as modified and supplemented by the following:

- a. Prefilters should be designed, constructed, and tested consistent with Sections FB or FJ of ASME AG-1b-2009.
- b. Air heaters should be designed, constructed, and tested consistent with Section CA of ASME AG-1b-2009.

- c. HEPA filters should be designed, constructed, and tested consistent with Sections FC of ASME AG-1b-2009. HEPA filters should be compatible with the chemical and physical composition and physical conditions of the air stream. Each HEPA filter should be tested for penetration of a challenge aerosol, such as dioctyl phthalate or 4-centistoke poly-alpha olephin, in accordance with Section TA of ASME AG-1b-2009.
- d. HEPA and Type II adsorber cell mounting frames should be designed and constructed in accordance with Section FG of ASME AG-1b-2009.
- e. Filter and adsorber sections should be arranged in accordance with Section HA of ASME AG-1b-2009.
- f. Filter housings, including floors and doors, and electrical conduits, drains, and other piping installed inside filter housings should be designed and constructed in accordance with Section HA of ASME AG-1b-2009.
- g. If the relative humidity of the atmosphere entering the air cleanup system can be expected to exceed 70 percent during normal operation, the design should include heaters or cooling coils, or both, to maintain relative humidity at or below 70 percent to ensure adsorption unit efficiency. Heaters should be designed, constructed, and tested in accordance with Section CA of ASME AG-1b-2009.
- h. Adsorber cells should be designed, constructed, and tested in accordance with Section FD for Type II or Section FE for Type III or Section FH of ASME AG-1b-2009 for Type IV adsorber cells.
 - (1) Design of an adsorber section should consider possible iodine desorption and adsorbent autoignition that may result from radioactivity-induced heat in the adsorbent and concomitant temperature rise. If needed, prevention and mitigation features could include low-flow air or inert gas bleed, cooling coils, cleanup unit isolation, or water sprays.
 - (2) If a water-based fire suppression or prevention (cooling) system is installed in a normal atmosphere cleanup system housing, it should be designed for manual actuation unless a reasonable possibility exists that iodine desorption and adsorbent autoignition could occur in the housing. If autoignition is a reasonable possibility, the fire suppression system should have both manual and automatic actuation. The fire suppression system should use open spray nozzles of sufficient size, number, and location to provide complete coverage over the entire surface of the combustible filter/adsorber media. The fire system should be hard piped and supplied with a reliable source of water of adequate pressure and flow. Location of the water supply manual actuation device should be remote from the cleanup system housing and consistent with the guidance of RG 8.8. Reliable mechanical or electrical detection devices sensing temperature, smoke, carbon monoxide, or other indications of fire ignition should be included in the system for manual and automatic actuation methods. Monitoring indicators for these detector outputs should be remote from the system housings and consistent with the guidance of RG 8.8 and support the manual actuation capability. Cross-zoning of detectors may be used for automatic actuation.

- (3) For portions of atmospheric clean up systems and power cycle off gas systems (such as filter housings, delay tanks or beds, and low-points in ductwork), the design should consider features to collect and drain accumulated water from various sources. The presence and accumulation of water within portions of these systems may be attributed to condensation and from water-based fire suppression systems, when triggered. The design should provide the means to collect and route water to the appropriate radioactive waste management system given that the water would entrain radioactive materials present in such systems.
- (4) The design of water collection systems and drains should consider the requirements of 10 CFR 20.1406 in minimizing the contamination of plant facilities and the environment. Additional guidance supporting 10 CFR 20.1406 is presented in:
 1. Regulatory Guide 1.143, which describes systems handling of radioactive materials in liquids, gaseous and solid collection systems that include construction of structures. Further, RG 4.21 gives guidance for design of facilities to minimize contamination of the facility and the environment, and the generation of waste.
 2. NUREG-0800 gives NRC review criteria for nuclear power plants.
 3. Nuclear Energy Institute (NEI) technical report NEI 08-08A "Guidance for Life Cycle Minimization of Contamination" (Ref. 16), provides a method for licensees to describe operational policies and operational programs to meet the programmatic requirements of 10 CFR Part 20.1406(a) and (b) for life cycle minimization of contamination. Meeting these requirements is achieved, in part, by addressing the applicable regulatory position elements of RG 4.21.

The main objective of the regulations and NRC guidance is to avoid unmonitored and uncontrolled releases of radioactive materials on the site and in uncontrolled areas, and provide information that can be used to assess potential radiological hazards.

- i. The adsorber section of the normal atmosphere cleanup system may contain any adsorbent material demonstrated to remove gaseous iodine (elemental iodine and organic iodides) from air with the required efficiency or better.
 - (1) Each original or replacement batch or lot of impregnated activated carbon media used in an adsorber section should be prepared, inspected, and tested consistent with Section FF of ASME AG-1b-2009.
 - (2) If impregnated activated carbon media is used, the adsorber section design should provide for a minimum atmosphere residence time of 0.05 seconds per centimeter (0.125 seconds per inch) of adsorbent media bed depth at rated flow.
 - (3) Sections FD, FE, and FH of ASME AG-1b-2009 should be used to determine residence time.

- (4) If sample (inservice test) canisters are used, their design should be consistent with Section FE of ASME AG-1b-2009 or Appendix I to ASME N509-2002.
- j. Ductwork should be designed, constructed, and tested consistent with Section SA of ASME AG-1b-2009.
- k. Duct and housing layout designs should minimize ledges, protrusions, and crevices that could collect dust and moisture and impede personnel work performance or create avoidable industrial safety hazards. Turning vanes or other airflow distribution devices should be installed where needed to achieve acceptably uniform flow profiles and support representative airflow measurements.
- l. Dampers should be designed, constructed, and tested consistent with Section DA of ASME AG-1b-2009.
- m. Fan/blower and motor, mounting, and ductwork connections should be designed, constructed, and tested consistent with Section BA for fans/blowers and Section SA of ASME AG-1b-2009 for ducts.
- n. For power cycle waste offgas systems relying on activated carbon delay tanks or beds, the above component design criteria and qualification testing are deemed applicable, but should be evaluated and applied taking into consideration the system's specific design features.

5. Maintainability Criteria

Cleanup system design should incorporate provisions for maintenance consistent with Section HA of ASME AG-1b-2009 as modified and supplemented by the following:

- a. System design should support accessibility for inspection and maintenance. Filtration unit enclosures should provide a minimum of 0.92 meters (3 feet) from mounting frame to mounting frame between banks of components. Where components within a bank are designed for replacement, the spacing between banks should be the length of the component plus at least 0.92 meters (3 feet).
- b. Cleanup system components (i.e., HEPA filters, prefilters, and adsorbers) that are used during system construction should be replaced before the system is declared fully functional.
- c. Duct access for inspection and maintenance should be provided consistent with the guidance of Section 4.3.4 of National Fire Protection Association (NFPA) 90A, "Standard for the Installation of Air Conditioning and Ventilation Systems" (Ref. 17).
- d. For power cycle waste offgas systems relying on activated carbon delay tanks or beds, the above maintainability criteria are deemed applicable, but should be evaluated and applied taking into consideration the system's specific design features.

6. In-Place Testing Criteria

Initial in-place testing of normal atmosphere cleanup systems should be performed consistent with Section TA of ASME AG-1b-2009. Periodic in-place testing of the cleanup systems and components should be performed consistent with ASME N511-2007 as modified and supplemented by the following:

- a. A visual inspection of the normal atmosphere cleanup system and all associated components should be performed consistent with Appendix I to ASME N511-2007.
- b. In-place aerosol leak tests for HEPA filters upstream from the carbon adsorbers should be performed (1) consistent with and at the frequency intervals shown in Section 5.7 and Appendix III to ASME N511-2007, (2) after each partial or complete replacement of a HEPA filter bank, (3) following detection of, or evidence of, penetration or intrusion of water or other material into any portion of a cleanup system that may have an adverse effect on the functional capability of the filters, and (4) following painting, fire, or chemical release in any ventilation zone communicating with the system that may have an adverse effect on the functional capability of the system. The leak test should confirm a combined penetration and leakage (or bypass) of the normal atmosphere cleanup system of less than 0.05 percent of the challenge aerosol at a system-rated flow ± 10 percent to warrant a 99-percent removal efficiency for particulates.
- c. HEPA filter sections that fail to satisfy appropriate leak test criteria should be examined to determine location and cause of leaks. Adjustments, such as alignment of filter cases and tightening of filter hold-down fasteners, may be made. Defective, damaged, or torn filter media should not be repaired by patching and caulking; filters should be replaced and not repaired. After adjustments or filter replacement, the cleanup system should be retested.
- d. Cleanup system adsorbers should be in-place leak tested (1) consistent with and at the frequency intervals shown in Section 5.8 and Appendix IV to ASME N511-2007, (2) following removal of an adsorber sample for laboratory testing if the integrity of the adsorber section is affected, (3) after each partial or complete replacement of carbon adsorber in an adsorber section, (4) following detection of, or evidence of, penetration or intrusion of water or other material into any portion of a normal atmosphere cleanup system that may have an adverse effect on the functional capability of the adsorbers, and (5) following painting, fire, or chemical release in any ventilation zone communicating with the system that may have an adverse effect on the functional capability of the system. The leak test should confirm a combined penetration and leakage (or bypass) of the adsorber section of 0.05 percent or less of the challenge gas at a system-rated flow ± 10 percent.
- e. Adsorber sections that fail to satisfy the appropriate leak test conditions should be examined to determine the location and cause of leaks. Adjustments, such as alignment of adsorber cells, tightening of adsorber cell hold-down fasteners, or tightening of test canister fixtures, may be made. Defective or damaged adsorber cells, mounting frames, or housings should not be temporarily repaired with patching material or caulking. After adjustments or adsorber cell replacement, the cleanup system should be retested.
- f. Painting, fire, or chemical release is “not communicating” with the HEPA filter or adsorber if the cleanup system is not in operation, the isolation dampers are closed, and there is no pressure differential across the filter housing. This provides reasonable

assurance that air is not passing through the filters and adsorbers. Conservative, well-documented administrative controls should be implemented that define the terms “painting,” “fire,” and “chemical release” with respect to the potential for degrading cleanup system HEPA filters and adsorbers.

- g. If welding repairs are performed on, within, or adjacent to the cleanup system ducts, housing, or mounting frames, the HEPA filters and adsorbers should first be removed from the housing (or otherwise protected). When repairs are completed and filters and adsorbers reinstalled, the cleanup system should be visually inspected and leak tested as described in Regulatory Positions 6.a, 6.b, and 6.d of this guide.
- h. For power cycle waste offgas systems relying on activated carbon delay tanks or beds, the above in place testing criteria are deemed applicable, but should be evaluated and applied taking into consideration the system’s specific design features.

7. Laboratory Testing Criteria for Activated Carbon

- a. Activated carbon adsorber sections of the cleanup system should be assigned the decontamination efficiencies given in Table 1 for radioiodine if the following conditions are met:
 - (1) The adsorber section meets the conditions given in Regulatory Position 6.d of this guide.
 - (2) New activated carbon meets the physical property specifications given in Regulatory Position 4.i of this guide.
 - (3) Representative samples of used activated carbon pass the laboratory tests given in Table 1 of this guide.
- b. Efficiency of an activated carbon adsorber section should be determined by laboratory testing of representative samples of the activated carbon experiencing the same service conditions and the same exposure to all contaminants as the entire adsorber section. Each representative sample should be 5.1 centimeters (2 inches) or more in both length and diameter, and each sample should have the same qualification and batch test characteristics as the system adsorbent. A sufficient number of representative samples should be located in parallel with the adsorber section to allow periodic determination of system adsorbent penetration throughout its service life. Where system activated carbon adsorber is greater than 5.1 centimeters (2 inches) deep, each representative sampling should consist of an equivalent depth. Once representative samples are removed for laboratory testing, the positions they occupied should be blocked off to maintain adsorber section capability.
- c. Sampling and analysis of adsorbent should be performed (1) consistent with and at the frequency intervals shown in Sections 7 and 5.9 of ASME N511-2007, (2) following painting, fire, or chemical release in any ventilation zone communicating with the system that may have an adverse effect on the functional capability of the carbon media, and (3) following detection of, or evidence of, penetration or intrusion of water or other material into any portion of a normal atmosphere cleanup system that may have an adverse effect on the functional capability of the adsorber media.

- d. Laboratory tests of representative samples of adsorbent should be conducted as indicated in Table 1 of this guide, with the test gas flow in the same direction as normal cleanup system flow unless using bulk sample extraction methods from deep bed adsorbers. Similar laboratory tests should be performed on a sample before loading media into the adsorber section to establish a baseline for comparison with future sample test results. The contents of an activated carbon adsorber section should be replaced with new, unused activated carbon adsorbent meeting the physical properties identified in Regulatory Position 4.i of this guide if (1) testing in accordance with Table 1 of this guide results in a representative sample failing an acceptance criterion or (2) no representative sample is available for testing.
- e. For power cycle waste offgas systems relying on activated carbon delay tanks or beds, the above laboratory testing criteria for activated carbon are deemed applicable, but should be evaluated and applied taking into consideration the system's specific design features.

Table 1. Inservice Adsorber Laboratory Tests for Activated Carbon

Activated Carbon Total Bed Depth	Maximum Assigned Activated Carbon Decontamination Efficiencies		Methyl Iodide Penetration Acceptance Criterion for Representative Sample
2 inches	Elemental iodine	95%	Penetration $\leq 5\%$ when tested in accordance with ASTM D3803-1991
	Organic iodide	95%	
4 inches or greater (in-series beds are treated as a single bed of aggregate depth)	Elemental iodine	99%	Penetration $\leq 1\%$ when tested in accordance with ASTM D3803-1991
	Organic iodide	99%	
Activated carbon in delay tanks or beds	Elemental iodine	99%	Penetration $\leq 1\%$ when tested in accordance with ASTM D3803-1991
	Organic iodide	99%	

Table 1 Notes:

- (1) See Appendix I to ASME N509-2002 for the definition of a representative sample.
- (2) Credited decontamination efficiencies (a portion of which includes bypass leakage) are based on a 0.25-second residence time per 5.1 centimeter (2-inch bed depth).
- (3) The activated carbon, when new, should meet the specifications of Regulatory Position 4.i of this guide. Table 1 provides acceptable decontamination efficiencies and methyl iodide test penetrations of used activated carbon samples for laboratory testing. Testing should be performed at the frequencies specified in Regulatory Position 7.c of this guide. Testing should be performed in accordance with American Society for Testing and Materials (ASTM) D3803-1991 (Reaffirmed 2014, "Standard Test Methods for Nuclear-Grade Activated Carbon" (Ref. 18), with an entering air temperature of 30 degrees Celsius (86 degrees Fahrenheit) and a relative humidity of 95 percent (or 70 percent with humidity control). Humidity control can be provided by heaters, cooling coils, or an analysis that demonstrates that the air entering the installed adsorber section would be maintained less than or equal to a 70-percent relative humidity level.

- (4) Organic iodide and elemental iodine are the forms of iodine that are expected to be absorbed by activated carbon. Organic iodide is more difficult for activated carbon to adsorb than elemental iodine. Therefore, the laboratory test to determine the performance of the activated carbon adsorber is based on organic iodide. Methyl iodide is the organic form of iodine that is used in the laboratory test.
- (5) For power cycle waste offgas systems relying on activated carbon delay tanks or beds, the inservice adsorber laboratory tests should confirm that the proper types of activated carbon (nuclear grade and defined mesh size) are tested for representative batches of activated carbon over the entire design inventory of the waste offgas treatment system, given the design capacity and number of delay tanks or beds.

D. IMPLEMENTATION

The purpose of this section is to provide information on how applicants and licensees¹ may use this guide and information regarding the NRC's plans for using this regulatory guide. In addition, it describes how the NRC staff complies with 10 CFR 50.109, "Backfitting" and any applicable finality provisions in 10 CFR Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants."

Use by Applicants and Licensees

Applicants and licensees may voluntarily² use the guidance in this document to demonstrate compliance with the underlying NRC regulations. Methods or solutions that differ from those described in this regulatory guide may be deemed acceptable if they provide sufficient basis and information for the NRC staff to verify that the proposed alternative demonstrates compliance with the appropriate NRC regulations. Current licensees may continue to use guidance the NRC found acceptable for complying with the identified regulations as long as their current licensing basis remains unchanged.

Licensees may use the information in this regulatory guide for actions which do not require NRC review and approval such as changes to a facility design under 10 CFR 50.59, "Changes, Tests, and Experiments." Licensees may use the information in this regulatory guide or applicable parts to resolve regulatory or inspection issues.

Use by NRC Staff

The NRC staff does not intend or approve any imposition or backfitting of the guidance in this regulatory guide. The NRC staff does not expect any existing licensee to use or commit to using the guidance in this regulatory guide, unless the licensee makes a change to its licensing basis. The NRC staff does not expect or plan to request licensees to voluntarily adopt this regulatory guide to resolve a generic regulatory issue. The NRC staff does not expect or plan to initiate NRC regulatory action which would require the use of this regulatory guide. Examples of such unplanned NRC regulatory actions include issuance of an order requiring the use of the regulatory guide, requests for information under 10 CFR 50.54(f) as to whether a licensee intends to commit to use of this regulatory guide, generic communication, or promulgation of a rule requiring the use of this regulatory guide without further backfit consideration.

During regulatory discussions on plant specific operational issues, the staff may discuss with licensees various actions consistent with staff positions in this regulatory guide, as one acceptable means of meeting the underlying NRC regulatory requirement. Such discussions would not ordinarily be considered backfitting even if prior versions of this regulatory guide are part of the licensing basis of the facility. However, unless this regulatory guide is part of the licensing basis for a facility, the staff may not represent to the licensee that the licensee's failure to comply with the positions in this regulatory guide constitutes a violation.

If an existing licensee voluntarily seeks a license amendment or change and (1) the NRC staff's consideration of the request involves a regulatory issue directly relevant to this new or revised regulatory guide and (2) the specific subject matter of this regulatory guide is an essential consideration in the staff's

¹ In this section, "licensees" refers to licensees of nuclear power plants under 10 CFR Parts 50 and 52; and the term "applicants," refers to applicants for licenses and permits for (or relating to) nuclear power plants under 10 CFR Parts 50 and 52, and applicants for standard design approvals and standard design certifications under 10 CFR Part 52.

² In this section, "voluntary" and "voluntarily" means that the licensee is seeking the action of its own accord, without the force of a legally binding requirement or an NRC representation of further licensing or enforcement action.

determination of the acceptability of the licensee's request, then the staff may request that the licensee either follow the guidance in this regulatory guide or provide an equivalent alternative process that demonstrates compliance with the underlying NRC regulatory requirements. This is not considered backfitting as defined in 10 CFR 50.109(a)(1) or a violation of any of the issue finality provisions in 10 CFR Part 52.

Additionally, an existing applicant may be required to comply to new rules, orders, or guidance if 10 CFR 50.109(a)(3) applies.

If a licensee believes that the NRC is either using this regulatory guide or requesting or requiring the licensee to implement the methods or processes in this regulatory guide in a manner inconsistent with the discussion in this Implementation section, then the licensee may file a backfit appeal with the NRC in accordance with the guidance in NRC Management Directive 8.4, "Management of Facility-Specific Backfitting and Information Collection" (Ref. 19) and NUREG-1409, "Backfitting Guidelines," (Ref. 20).

REFERENCES³

1. *U.S. Code of Federal Regulations (CFR) “Domestic Licensing of Production and Utilization Facilities,”* Part 50, Chapter 1, Title 10, “Energy,” Washington, DC.
2. CFR, “Licenses, Certifications, and Approvals for Nuclear Power Plants,” Part 52, Chapter 1, Title 10, “Energy,” Washington, DC.
3. CFR, 10 CFR 20.1406, “Minimization of contamination,” U.S. Nuclear Regulatory Commission, Washington DC.
4. Nuclear Regulatory Commission (NRC), Regulatory Guide 1.52, “Design, Inspection, and Testing Criteria for Air Filtration and Adsorption Units of Post-Accident Engineered-Safety-Feature Atmosphere Cleanup Systems in Light-Water-Cooled Nuclear Power Plants,” Washington, DC.
5. NRC, Regulatory Guide 1.143, “Design Guidance for Radioactive Waste Management Systems, Structures and Components Installed in Light-Water-Cooled Nuclear Reactor Power Plants,” Washington, DC.
6. NRC, Regulatory Guide 4.21, “Minimization of Contamination and Radioactive Waste Generation: Life Cycle Planning,” Washington, DC.
7. NRC, NUREG-0800 “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition”
8. American Society of Mechanical Engineers (ASME) AG-1b-2009, “Code on Nuclear Air and Gas Treatment,” 2009, including 2010 Addenda 1a and 2011 Addenda 1b, American Society of Mechanical Engineers, New York, NY.⁴
9. ASME N509-2002 (Reaffirmed 2008), “Nuclear Power Plant Air-Cleaning Units and Components,” American Society of Mechanical Engineers, New York, NY.
10. ASME N510-2007, “Testing of Nuclear Air-Treatment Systems,” American Society of Mechanical Engineers, New York, NY.
11. ASME N511-2007, Standard N511, “Inservice Testing of Nuclear Air Treatment, Heating, Ventilating, and Air-Conditioning Systems,” American Society of Mechanical Engineers, New York, NY.

³ Publicly available documents from the U.S. Nuclear Regulatory Commission (NRC) are available electronically through the NRC Library on the NRC’s public Web site at <http://www.nrc.gov/reading-rm/doc-collections/>. The documents can also be viewed on-line for free or printed for a fee in the NRC’s Public Document Room (PDR) at 11555 Rockville Pike, Rockville, MD; the mailing address is USNRC PDR, Washington, DC 20555; telephone (301) 415-4737 or (800) 397-4209; fax (301) 415 3548; and e-mail pdr_resource@nrc.gov.

⁴ Copies of American Society of Mechanical Engineers (ASME) standards may be purchased from ASME, Two Park Avenue, New York, New York 10016-5990; telephone (800) 843-2763. Purchase information is available through the ASME Web-based store at <http://www.asme.org/Codes/Publications/>.

12. International Atomic Energy Agency (IAEA), NS-G-1.10, "Design of Reactor Containment Systems of Nuclear Power Plants," Vienna, Austria.⁵
13. IAEA, NS-G-2.7, "Radiation Protection and Radioactive Waste Management in the Operation of Nuclear Power Plants," Vienna, Austria.
14. IAEA, SSR-2/1, "Safety of Nuclear Power Plants: Design," Vienna, Austria.
15. NRC, Regulatory Guide 8.8, "Information Relevant to Ensuring that Occupational Radiation Exposures at Nuclear Power Stations Will Be As Low As Is Reasonably Achievable," Washington, DC.
16. Nuclear Energy Institute (NEI) technical report NEI 08-08A "Guidance for Life Cycle Minimization of Contamination," (ADAMS Accession Number ML093220530, ML092720253)
17. National Fire Protection Association, (NFPA) 90A, "Standard for the Installation of Air Conditioning and Ventilation Systems," National Fire Codes, 2002, Quincy, MA.⁶
18. American Society for Testing and Materials (ASTM) D3803-1991 (Reaffirmed 2014), "Standard Test Methods for Nuclear-Grade Activated Carbon," ASTM International, West Conshohocken, PA.⁷
19. NRC, Management Directive 8.4, "Management of Facility-specific Backfitting and Information Collection," Washington DC.
20. NRC, NUREG-1409, "Backfitting Guidelines," Washington DC.

⁵ Copies of International Atomic Energy Agency (IAEA) documents may be obtained through their Web site: www.iaea.org/ or by writing the International Atomic Energy Agency P.O. Box 100 Wagramer Strasse 5, A-1400 Vienna, Austria. Telephone (+431) 2600-0, Fax (+431) 2600-7, or E-Mail at Official.Mail@IAEA.Org

⁶ Copies of the National Fire Protection Association (NFPA) may be purchased from the NFPA, 1 Batterymarch Park, Quincy, Massachusetts; telephone (800) 344-3555. Purchase information is available through the NFPA Web-based store at <http://www.nfpa.org/Catalog/>.

⁷ Copies of American Society for Testing and Materials (ASTM) standards may be purchased from ASTM, 100 Barr Harbor Drive, P.O. Box C700, West Conshohocken, Pennsylvania 19428-2959; telephone (610) 832-9585. Purchase information is available through the ASTM Web site at <http://www.astm.org>.