May 28, 1982

NOTE TO: Homer Lowenberg

FROM:

Paul S. Check

SUBJECT: CRBR FUEL CYCLE - REVIEW OF DRAFT MATERIAL FOR FES UPDATE

We have reviewed the material you provided with a memorandum dated May 21, 1982, and herewith return it with our suggestions indicated on individual pages. Most of our notations are editorial. There are two items we wish to call to your attention. In Section 7.2, we suggest the addition of a brief discussion on uranium hexafluoride. On page D.14, the efficiency of HEPA filters needs further attention (see attached Proceedings of Fourteenth ERDA Air Cleaning Conference.)

In general, the draft material is prepared well and it appears appropriate for our purpose. We appreciate the good efforts that have gone into it and look forward to receiving the final version.

Paul S. Check, Director CRBR Program Office

Office of Nuclear Reactor Regulation

cc: H. Denton

C. Thomas

P. Leech

B. Morris

JJ. Swift

TABLE 12.1-32
ISOTOPIC CURIE CONTENT - EQUILIBRIUM CORE-EOC

CO2 72 2.984E+0	NI2 72 4.894E+02	CU2 72 2.607E+03	ZN2 72 4.207E+03	GA2 72 4.245E+03	
NI2 73 2.783E+01	CU2 73 9.889+02	ZN2 73 4.940E+03		GE1 73 5.669E+03	
	CU2 74 1.224+03	ZN2 74 9.817E+03			
The second secon	ZN2 75 1.212E+04	GA2 75 1.813E+04			
	AS2 76 8.747E+02	NI2 77 1.529E+00	CU2 77 1.879E+02	ZN2 77 1.192E+04	GA2 77 5.780E+04
		AS2 77 8.750+04			
ZN2 78 8.095E+03		GE2 78 1.467E+05			
		AS2 79 2.875E+05			
CU2 80 4.742E+00	ZN2 80 1.962+03	GA2 80 3.772E+04	GE2 80 3.208E+05	AS2 80 4.433+05	BR1 80 1.121E+01

TABLE 12.1-32 (Continued)

	BR2 80 2.272E+01	CU2 81 5.134E-01		GA2 81 2.289E+04	GE2 81 3.513E+05	AS2 81 6.476E+05
	SE1 81	SE2 81	KR1 81	KR2 81	ZN2 82	GA2 82
	3.133E+04	7.175E+05	2.961E-01	2.273E-06	9.049+01	8.798E+03
	GE2 82	AS1 82	AS2 82	BR1 82	BR2 82	ZN2 83
	3.377E+05	2.934E+05	6.587+05	9.033E+03	1.781E+04	8.255E+00
	GA2 83 2.565E+03	GE2 83 2.253E+05	AS2 83 1.329E+06	SE1 83 1.567E+06		BR2 83 2.823E+06
	KR1 83 2.823E+06	GA2 84 5.228E+02	GE2 84 1.051E+05	AS2 84 1.052E+06		
_	BR2 84	GA2 85	GE2 85	AS2 85	SE1 85	SE2 85
	4.206E+06	1.002E-08	1.299E+04	4.030E+05	1.455+06	1.949E+06
-	BR2 85	KR1 85	KR2 85	GE2 86	AS2 86	SE2 86
	4.884E+06	4.957E+06	1.034E+05	2.875E+03	1.733E+05	3.090E+06
-	BR1 86	BR2 86	RB1 86	RB2 86	GE2 87	AS2 87
	3.031E+06	3.138E+06	1.700E+04	1.382E+05	3.251E+02	4.210E+04
-	SE2 87 1.726E+06	BR2 87 5.565E+06	KR2 87 8.056E+06			The same of the sa

TABLE 12.1-32 (Continued)

AS2 88 9.865E+03	SE2 88 8.761E+05	BR2 88 5.111+06	KR2 88 1.141E+07		
SE2 89 2.170E+05	BR2 89 3.087E+06	KR2 89 1.244E+07	RB2 89 * 1.558E+07	Y1 89 3.000E+01	
	BR2 90 1.339E+06		RB1 90 4.718E+06	RB2 90 1.308E+07	SR2 90 6.791 E+05
Y1 90 9.232E+02	Y2 90 7.108+05	ZR1 90 2.437E-01	SE2 91 6.532E+03	BR2 91 3.994E+05	KR2 91 8.030+06
RB2 91 1.799E+07			Y2 91 2.042E+07	SE2 92 8.293E+02	BR2 92 1.093E+05
KR2 92 4.188E+06	RB2 92 1.506E+07			SE2 93 7.106E-08	
KR2 93 1.670E+06	The second second second	SR2 93 2.921E+07	Y1 93 1.159E+02	Y2 93 3.065E+07	
NB1 93 1.856E+00	BR2 94 2.024E+03	KR2 94 3.099E+05	RB2 94 5.461E+06	SR2 94 2.864E+07	Y2 94 3.326E+07
NB1 94 7.821E+01	NB2 94 8.026E-03	BR2 95 1.481 E+02	KR2 95 8.760+04	RB2 95 1.626E+06	SR2 95 2.525E+07

\*SR2 89 1.60+07

TABLE 12.1-32 (Continued)

Y2 95	ZR2 95	NB1 95	NB2 95	BR2 96	KR2 96
3.657E+07	3.624E+07	4.353E+05	3.476E+07	1.018E+01	1.578E+04
RB2 96	SR2 96	Y2 96	NB2 96	KR2 97	RB2 97
5.848E+05	1.489E+07	3.397E+07	1.381E+05	4.564E+02	6.197E+04
SR2 97	Y2 97		NB1 97	NB2 97	KR2 98
4.154E+06	2.203E+07		3.542E+07	4.124E+07	1.455E+02
R82 98	SR2 98	Y2 98	ZR2 98		NB2 98
3.975E+04	2.656E+06	1.150E+07	4.145E+07		6.661E+05
RB2 99	SR2 99	Y2 99	ZR2 99	NB1 99	NB2 99
4.399E+03	3.685E+05	8.174E+06	3.667E+07	2.466E+06	4.327E+07
MO2 99	TC1 99	RB2 100	SR2 100	Y2 100	ZR2 100
4.664E+07	4.025E+07	5.381 E+02	2.518E+05	3.797E+06	3.509E+07
NB1 100	NB2 100	TC2 100	RB2 101	SR2 101	Y2 101
2.368E+07	2.367E+07	4.477E+06	3.386E-08	2.923E+04	1.389E+07
ZR2 101	NB2 101	MO2 101	TC2 101	SR2 102	Y2 102
1.988E+07	4.129E+07	5.136E+07	5.139E+07	3.200E+03	2.883E+05
ZR2 102	NB2 102	MO2 102		TC2 102	SR2 103
1.346E+07	3.673E+07	5.141E+07		5.151+07	9.053E+01

TABLE 12.1-32 (Continued)

Y2 103	ZR2 103	NB2 103	MO2 103	TC2 103	RU2 103
5.192E+04	4.267E+06	2.587E+07	5.014E+07	5.144E+07	5.260E+07
RH1 103	SR2 104	Y2 104	ZR2 104	NB2 104	MO2 104
5.260+07	3.966E+00	4.130E+03	1.115E+06	9.915E+06	4.414E+07
TC2 104	RH1 104	RH2 104	Y2 105	ZR2 105	NB2 105
4.892E+07	2.552E+05	3.567E+06	2.120E+02	1.030E+05	3.097E+06
M02 105	TC2 105	RU2 105	RH1 105	RH2 105	
2.784E+07	3.712E+07	3.851E+07	9.935E+06	3.850E+07	
ZR2 106	NB2 106	MO2 106	TC2 106	RU2 106	
9.031E+03	5.245E+05	1.513E+07	3.000E+07	1.957E+07	
RH2 106	Y2 107	ZR2 107	NB2 107	MO2 107	TC2 107
1.958E+07	8.634E-02	2.996E+02	5.869E+04	4.308E+06	1.572E+07
RU2 107	RH2 107	PD1 107	PD2 107	ZR2 108	NB2 108
2.228E+07	2.238E+07	1.867E+05	3.361E+00	1.445E+02	1.576E+04
MO2 108	TC2 108	RU2 108	RH1 108	RH2 108	AG2 108
9.097E+05	6.679E+06	1.489E+07	2.056E+05	1.510E+07	3.464E-01
ZR2 109	NB2 109	MO2 109	TC2 109	RU2 109	
1.195E+01	3.857E+03	4.258E+05	4.718E+06	1.081E+07	

TABLE 12.1-32 (Continued)

RH2 109	PD1 109	PD2 109	AG1 109	CD2 109	NB2 110
1.123E+07	5.622E+06	1.159E+07	1.159E+07	3.468E-03	1.121E+02
M02 110	TC2 110	RU2 110	RH1 110	RH2 110	AG1 110
3.152E+04	5.001E+05	3.766E+06	3.168E+05	4.187E+06	4.327E+04
AG2 110	NB2 111	MO2 111	TC2 111	RU2 111	
6.042E+05	1.045E+01	2.782E+03	1.122E+05	1.615E+06	
PD1 111	PD2 111	AG1 111	AG2 111	CD1 111	NB2 112
6.111E+04	2.575E+06	2.566E+06	2.609E+06	1.963E+02	9.922E-10
MO2 112	TC2 112	RU2 112	RH2 112	PD2 112	AG2 112
2.445E:02	1.255E+04	3.241E+05	1.173E+06	1.360E+06	1.363E+06
MO2 113	TC2 113	RU2 113	RH2 113	PD2 113	AG1 113
2.584E+01	3.356E+03	1.563E+05	5.042E+05	9.061E+05	9.309E+05
AG2 113	CD1 113	IN1 113	MO2 114	TC2 114	The same and the last to be
8.193E+05	1.914E+03	2.350E-04	1.543E+00	3.877E+02	
RH2 114	PD2 114	AG2 114	IN1 114	IN2 114	MO2 115
2.661E+05	6.535E+05	6.714E+05	2.007E+01	3.226E+01	8.050E-02
TC2 115 6.701 E+01	RU2 115 8.954E+03	RH2 115 1.325E+05		AG1 115 1.650E+05	

TABLE 12.1-32 (Continued)

CD1 115	CD2 115	IN1 115	IN2 115	TC2 116	RU2 116
3.545E+04	5.462E+05	5.461E+05	1.107E-09	5.069E+00	2.249E+03
RH2 116	PD2 116	AG1 116	AG2 116	IN1 116	IN2 116
3.526E+04	3.315E+05	2.184E+05	2.248E+05	3.233E+04	8.907E+03
TC2 117	RU2 117	RH2 117	PD2 117	AG1 117	AG2 117
2.474E-01	2.264E+02	1.406E+04	2.239E+05	2.027E+05	2.084E+05
CD1 117	CD2 117	IN1 117	IN2 117	SN1 117	TC2 118
6.490E+04	3.991E+05	3.712E+05	2.674E+05	2.463E+02	1.992E-11
RU2 118	RH2 118	PD2 118	AG1 118	AG2 118	CD2 118
1.708E+03	1.184E+04	1.257E+05	1.713E+05	2.019E+05	4.458E+05
IN1 118	IN2 118	RU2 119	RH2 119	PD2 119	AG2 119
5.170E+02	4.464E+05	6.936E-07	6.082E+03	1.927E+05	4.020E+05
CD1 119	CD2 119	IN1 119	IN2 119 2.317E+05	SN1 119	RU2 120
2.206E+05	2.206E+05	2.207E+05		9.973E+03	3.864E-01
RH2 120	PD2 120	AG2 120	CD2 120		IN2 120
1.472E+02	1.923E+04	1.277E+05	4.162E+05		2.206E+05
RH2 121 2.759E+01	PD2 121 4.928E+03	AG2 121 7.996E+05	CD2 121 3.984E+05		

TABLE 12.1-32 (Continued)

SN1 121	SN2 121	RH2 122	PD2 122	AG2 122	CD2 122
1.941E+01	4.747E+05	4.007E+00	1.870E+03	2.311E+04	3.339E+05
IN1 122	IN2 122	SB1 122	SB2 122	RH2 123	PD2 123
5.355E+04	4.179E+05	4.222E+02	4.110E+04	5.249E-01	3.835E+02
AG2 123	CD2 123	IN1 123	IN2 123	SN1 123	
1.662E+04	3.118E+05	1.959E+05	3.646E+05	2.041E+05	
TE1 123	TE2 123	PD2 124	AG2 124	CD2 124	
1.695E+02	2.219E-11	1.214E+02	5.920E+03	2.604E+05	
SB2 124	PD2 125	AG2 125	CD2 125	IN1 125	
2.498E+04	4.483E-08	2.903E+03	1.816E+05	3.917E+05	
SN1 125 5.836E+05	SN2 125 7.583E+05	SB2 125 3.964E+05			AG2 126 8.480E+02
CD2 126	IN2 126	SN2 126	SB2 126	AG2 127	CD2 127
1.093E+05	7.273E+05	1.947E+00	6.887+04	8.151E-08	4.680E+04
	IN2 127 3.841E+05			SB2 127 3.762E+06	TE1 127 5.399E+05
TE2 127 3.690E+06	AG2 128 1.225E+02			SN2 128 4.626E+06	

TABLE 12.1-32 (Continued)

SB2 128	12 128	CD2 129	IN2 129	SN1 129	SN2 129
6.054E+05	2.573E+05	9.224E+03	4.333E+05	3.347E+06	3.352E+06
SB2 129	TE1 129	TE2 129	12 129	XE1 129	CD2 130
1.029E+07	2.651E+06	9.706E+06	6.730E-01	2.071E+03	2.092E+04
IN2 130	SN2 130	SB1 130	SB2 130	11 130	
5.655E+05	1.003E+07	1.226E+07	4.224E+06	3.288E+05	
CD2 131	IN2 131	SN2 131	SB2 131	TC1 131	TE2 131
3.291 E+03	2.360E+05	9.170E+06	2.447E+07	4.454E+06	2.633E+07
12 131	XE1 131	CD2 132	IN2 132	SN2 132	SB1 132
3.004E+07	2.121E+05	3.220E+02	6.328E+04	4.786E+06	8.503E+06
SB2 132	TE2 132	12 132	IN2 133	SN2 133	SB2 133
1.332E+07	3.998E+07	4.080E+07	9.661E+03	1.435E+06	1.361E+07
TE1 133	TE2 133	11 133		XE1 133	XE2 133
1.683E+07	3.204E+07	2.349E+06		1.62E+06	5.226E+07
IN2 134	SN2 134	SB1 134	SB2 134	TE2 134	
6.657E+02	2.828E+05	2.691 E+06	2.343E+06	4.032E+07	
12 134 5.465E+07	XE1 134 2.889E+05		CS2 134 6.603E+05		

TABLE 12.1-32 (Continued)

TE2 135	12 135	XE1 135	XE2 135	CS1 135	CD2 135
2.459E+07	5.039E+07	1.109E+07	5.648E+07	2.758E+04	2.549E+01
BA1 135	SN2 136	SB2 136	TE2 136	11 136	12 136
2.318E+02	3.145E+03	2.441E+05	1.073E+07	1.254E+07	2.349E+07
CS2 136	BA1 136	SB2 137	TE2 137	12 137	XE2 137
2.654E+06	4.247E+05	5.553E+04	3.948E+06	2.134E+07	4.569E+07
CS2 137	BA1 137	SB2 138	TE2 138	12 138	XE2 138
1.702E+06	1.617E+06	7.528E+03	1.060E+06	1.075E+07	3.643E+07
CS1 138	CS2 138	XE2 138	LA2 138	SB2 139	TE2 139
2.542+06	4.649E+07	3.643E+07	6.734E-10	6.001E+02	2.014E+05
12 139	XE2 139	CS2 139	BA2 139	TE2 140	12 140
4.354E+06	3.334E+07	4.444E+07	4.529E+07	3.452E+04	1.181E+06
XE2 140	CS2 140	BA2 140	LA2 140	TE2 141	12 141
1.955E+07	3.823E+07	4.190E+07	4.218E+07	1.312E+03	2.028E+05
XE2 141	CS2 141	BA2 141	LA2 141	CE2 14	TE2 142
7.600E+06	1.495E+07	4.265E+07	4.290E+07	4.287E+07	1.954E+02
12 142	XE2 142	CS2 142	BA2 142	LA2 142	CE2 142
4.102E+04	2.711E+06	1.495E+07	3.655E+07	3.770E+07	3.806E-04

TABLE 12.1-32 (Continued)

PR1 142	PR2 142	12 143	XE2 143	CS2 143	BA2 143
2.570E+05	5.130E+05	3.377E+03	3.726E+05	6.734E+06	3.046E+07
LA2 143	CE2 143	PR2 143	12 144	XE2 144	CS2 144
3.455E+07	3.481 E+07	3.478E+07	2.823E+02	1.192E+05	2.448E+06
BA2 144	LA2 144	CE2 144	PR1 144	PR2 144	ND2 144
2.120E+07	2.894E+07	2.016E+07	2.552E+05	2.019E+07	7.649E-09
12 145	XE2 145	CS2 145	BA2 145	LA2 145	CE2 145
1.427E-08	1.710E+04	5.590E+05	1.148E+07	2.237E+07	2.501E+07
PR2 145	XE2 146	CS2 146	BA2 146	LA2 146	CE2 146
2.503E+07	1.143E+03	8.232E+04	4,536E+06	1.495E+07	2.060E+07
PR2 146	XE2 147	CS2 147	BA2 147	LA2 147	CE2 147
2.070E+07	8.668E+01	2.758E+04	1.376E+06	7.677E+06	1.620E+07
PR2 147	ND2 147	PM2 147	SM2 147	CS2 148	BA2 148
1.676E+07	1.703E+07	5.021E+06	3.044E-05	1.597E+03	3.829E+05
LA2 148	CE2 148	PR2 148	PM1 148	PM2 148	SM2 148
2.797E+06	1.218E+07	1.372E+07	7.387E+05	7.891E+05	1.157E-10
CS2 149 3.283E-07	BA2 149 4.344E+04	LA2 149 9.875E+05			ND2 149 1.110E+07

TABLE 12.1-32 (Continued)

PM2 149	SM2 149	CS2 150	BA2 150	LA2 150	CE2 150
1.110E+07	1.065E-09	1.593E+00	4.159E+03	1.722E+05	2.879E+06
PR2 150	PM2 150	BA2 151	LA2 151	CE2 151	PR2 151
7.327E+06	1.026E+04	1.152E-05	3.065E+04	1.043E+06	4.280E+06
ND2 151	PM2 151	SM2 151	BA2 152	LA2 152	CE2 152
6.637E+06	6.673E+06	6.838E+04	1.075E+01	3.215E+03	3.853E+05
PR2 152	ND2 152	PM2 152	EU1 152	EU2 152	GD2 152
2.259E+06	4.874E+06	4.949E+06	4.909E+03	3.072E+02	1.844E-11
LA2 153	CE2 153	PR2 153	ND2 153	PM2 153	SM2 153
4.127E+02	7.587E+04	8.321E+05	2.856E+06	3.178E+06	3.464E+06
GD2 153	LA2 154	CE2 154	PR2 154	ND2 154	PM1 154
5.706E+01	1.709E+01	1.181E+04	2.213E+05	1.830E+06	2.415E+05
PM2 154	EU2 154	LA2 155	CE2 155	PR2 155	ND2 155
2.095E+06	3.147E+04	5.061E-09	1.156E+03	6.465E+04	9.661E+05
PM2 155	SM2 155	EU2 155	CE2 156	PR2 156	ND2 156
1.518E+06	1.657E+06	2.834E+05	1.272E+02	1.022E+04	4.255E+05
PM2 156	SM2 156	EU2 156	CE2 157	PR2 157	ND2 157
8.852E+05	1.022E+06	1.339E+06	6.965E+00	1.555E+03	1.148E+05

TABLE 12.1-32 (Continued)

PM2 157	SM2 157		PR2 158	ND2 158	PM2 158
5.038E+05	7.415E+05		9.092E+01	1.896E+04	1.679E+05
SM2 158	EU2 158	PR2 159	ND2 159	PM2 159	SM2 159
4.487E+05	4.682E+05	3.674E+00	1.621E+03	4.116E+04	2.302E+05
EU2 159	GD2 159	ND2 160	PM2 160	SM2 160	EU2 160
2.671E+05	2.954E+05	1.395E+02	6.625E+03	1.120E+05	1.624E+05
TB2 160 3.984E+04	ND2 161 7.062E+00	PM2 161 6.466E+02	SM2 161 2.282E+04		
TB2 161	PM2 162	SM2 162	EU2 162	GD2 162	TB1 162
9.183E+04	8.563E+00	1.974E+03	1.799E+04	4.037E+04	1.592E+03
TB2 162	SM2 163	EU2 163	GD2 163	TB2 163	SM2 164
4.036E+04	1.318E+02	3.358E+03	1.587E+04	1.786E+04	1.052E+01
EU2 164	GD2 164	TB2 164	SM2 165		GD2 165
6.291 E+02	8.073E+03	1.102E+04	3.951E-01		2.744E+03
TB2 165 5,591 E+03	DY1 165 4.335E+03	DY2 165 7.815E+03			
ER1 167 1.894E+00					

12.1-63L

MAY 2 8 1982

DISTRIBUTION CENTRAL FILE AEB R/F MThadnai WPasedag Plant File AC / RP RF

MEMORAMOUM FOR: Paul S. Check, Director

Clinch River Greeder Reactor Program Office, MRR

FROM:

R. W. Houston, Assistant Director for Radiation Protection Division of Systems Integration

SUDJECT:

EVALUATION OF CLASS 9 ACCIDENTS FOR THE CRBR ENVIRONMENTAL

REVIEW

In response to your request to L. G. Hulman, dated 3/31/82, the Accident Evaluation Branch (AEE) has re-evaluated the risks resulting from a Class 9 accident at CROR site.

Per your request, AED has utilized as a basis the Class 9 accident scenario in the existing FES. The event chosen in the FES results in release into the outer containment of 100% of the noble gases, 10% of the volatiles including halogens, and 1% of the solid fission products and fuel (including plutonium). Radionuclides are assumed to be released to etmosphere as a result of the failure of the containment 24 hours after their release from the core. The accident probability of one chance in one hundred thousand per year provided in your request was used in the present analysis. Since our evaluation is based on the methodologies of the Reactor Safety Study and the related follow-on work on calculation of light water reactor (LWR) consequences, our methods at present do not account for the large quantities of sodium present in the CRBRP in place of the large quantities of water present in the LWRs.

The results of the AEP analysis indicate that the calculated risks for the selected CRER accident release are substantially below the risks that the staff has presented in the environmental statements of light water reactors which have been licensed since the issuance of the Comission's June, 1980 Statement of policy. Based on this analysis the AEB has revised its 12/18/81 transmittal to you by including the findings of the present analysis. The revised input is enclosed.

This evaluation was performed, and the attached input prepared by Mohan Thadani X28941. The addendum on the liquid pathway was prepared by R. Codell (MGED), and reported in ACC transmittal to you dated 12/19/82. Original signed by

R. Wayne Houston

R. Wayne Houston, Assistant Director for Radiation Protection Division of Systems Integration

Enclosure: As stated

W. Pasedag cc: H. Denton G. Lear

> E. Case M. Thadani

R. Mattson R. Codell

P. Leech \*See Previous Concurrence Sheet

OFFICE	DSI:AEB * MThadani:ye	DSI:AEB* WPasedag	CHU LASH	DST WO LATE			
	5/ /92	5/ /82	5/25/82	540/82			

# ACCIDENT EVALUATION BRANCH INPUT TO THE FINAL ENVIRONMENTAL STATEMENT UPDATE FOR CLINCH RIVER BREEDER REACTOR PLANT

### Addendum to Section 7.1

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## 7.1 PLANT ACCIDENTS INVOLVING RADIOACTIVE MATERIALS

The staff has examined the Clinch River Breeder Reactor Plant (CRBRP) Final Environmental Statement (FES) with a view to updating the FES reflecting any plant-site features or regulatory framework changes that have occurred since the FES was issued in February 1977. The staff finds that since the issuance of the FES no plant-site changes have occurred that would materially change the environmental impacts or risks of accidents as reported in the FES. Since the issuance of the FES, however, the Commission has issued a Statement of Interim Policy (June 13, 1980) that provides guidance on the considerations to be given to nuclear power plant accidents under NEPA. Among other things the Commission's statement indicated that "this change in policy is not to be construed as any lack of confidence in conclusions regarding the environmental risks of accidents expressed in any previously issued (Environmental Impact) statements, nor, absent a showing of --special circumstances, as a basis for opening, reopening, or expanding any previous or ongoing proceeding."

The staff in its environmental review of the CRBRP application concluded that the CRBRP did constitute a special circumstance that warranted consideration of Class 9 accidents in the Environmental Statement. Since the CRBRP reactor was very different from the conventional light water reactor plants for which the safety experience base is much broader, the staff included in the CRBRP FES a discussion of the potential impacts and risks of such accidents. As noted in the Statement of Interim Policy, the fact that the staff had identified this case as a special circumstance was one of the considerations that led to the promulgation of the June 13, 1980 Statement.

In examining the CRBRP FES, as issued in 1977, the staff has considered the guidance of the Interim Policy Statement which was provided for "Future NEPA Reviews." We have concluded that the discussion of accidents as presented in the FES generally meets that guidance except for consideration of the risks due to liquid pathways. A discussion of the liquid pathway risks is included below.

The staff has also performed some new calculations to provide an additional perspective on the risk associated with the atmospheric release pathway for a hypothetical Class 9 accident at the CRBR, as discussed below:

A probabilistic risk analysis such as the Reactor Safety Study, WASH-1400, attempts to portray the complete spectrum of possible Class 9 event sequence. Such a probabilistic risk analysis has not been performed for the CRBR as currently designed. Therefore, for the purpose of estimating the risks of Class 9 events at the CRBR site comparable to the risks presented in environmental statements for LWRs, the staff has selected, as representative of the Class 9 event category, a specific release of radioactivity from the CRBR core with an associated estimate of a probability of its occurrence.

The event analyzed is that described in the FES (Table 7.2, f.n.11).

Specifically, an accident is postulated which results in a core release of 100% of the noble gases and volatiles, 10% of the solid fission product inventory and 10% of the plutonium inventory.\* In this scenario, the volatiles, including halogens, are reduced to 10% of the core inventory and the solid fission products and fuel are reduced to 1% of the core inventory during passage cut of the reactor vessel and into the outer containment building. Containment leakage is taken as proportional to the square root of the pressure for 24 hours, at which time containment integrity is assumed to be lost and all airborne material released to the environment.

<sup>\*</sup>In addition to these elements, activation products of the primary coolant (i.e. radioactive isotopes of sodium) would be released to the containment in accidents involving the loss of primary coolant. Although it is recognized that these isotopes could be substantial contributors to the accident source term, the present analytical models used by the staff are not readily amenable to an explicit inclusion of these isotopes in the quantitative analysis described herein.

The probability of this representative event has been estimated to be not greater than one in one hundred thousand per reactor year. This probability was selected for the new calculations discussed here in consideration of the nature of the representative sequence, in comparison with the results of other probabilistic risk ansyses, and in consideration of the staff's objective that there be no greater than one chance in a million per year for potential consequences greater than 10 CFR Part 100 guidelines for an individual plant.

#### ATMOSPHERIC PATHWAYS

The potential atmospheric pathway radiological consequences of this release have been calculated by the consequence model used in the RSS (NUREG-0340) adapted and modified to the specific CRBRP site. The model used one year site meteorology data, projected population for the year 2010 extending throughout regions of 80-km (50-mi) radius and 56-km (350-mi) radius from the site, and habitable land fractions within the 563-km (350-mi) radius.

The results of the calculations are summarized in table 7-1A as expectation values, or averages of environmental risk per year of reactor operation. These averages are instructive as an aid to the comparison of radiological risks associated with CRBR accident releases and those associated with risks calculated for recently evaluated LWRs. The table shows the average risk associated with population dose, early fatalities, latent fatalities, and cost of evacuation and protective actions.

## TABLE 7.1A Average Values of Environmental Risks due to Selected CRBR Accident

Environmental Risk (Per Reactor Year)	Average Value
Population exposure	
Person-rems within 80 km Total person-rems	8 12
Early Fatalities	0.0000004
Latent cancer, fatalities	
All organs excluding thyroid Thyroid only	0.0007 0.00005
Cost of protective actions and decontamination	\$156*

\*1980 dollars

It should be noted that these results do not fully account for the effects of the sodium coolant on the radioactive source term.

For example, inclusion of the effects of sodium is expected to reduce the quantity of iodine available for leakage. The large mass of sodium aerosol also contributes to the agglomeration and settling of aerosols in the primary containment. On the other hand, the sodium activation products would be released together with the primary coolant, thereby adding to the amount of radioactive material released to the containment. On balance, it is expected that these effects would not be so large as to invalidate the conclusions of these calculations. Further consideration of this subject will be included in the staff's review of the Probabilistic Risk Assessment for this plant, and in the staff's Safety Evaluation Report.

The assessment of environmental risks of atmospheric pathways, assuming reasonable protective action, shows that they are significantly lower than similarly calculated values for light water reactors currently being licensed for operation. See, for example, FES for Calloway (NUREG-0813), DES for Seabrook Station (NUREG-0895), FES for Susquehanna Station (NUREG-0564), and DES for Skagit (NUREG-0894) for the environmental risks of light water reactors.

#### LIQUID PATHWAYS

Surface water hydrologic properties at CRBRP should be similar to those used for the Liquid Pathways Generic Study (LPGS) small river site which was based on the Clinch - Tennessee - Ohio - Mississippi rivers system, although the river uses and populations in the LPGS were based upon national averages and have not been directly compared to the CRBRP. The groundwater characteristics at Clinch River do not indicate any unusual adverse transport characteristics.

Additionally, the CRBRP is a considerably smaller plant than LPGS case (CRBRP is 1121 MWt vs. 3425 MWt assumed for LPGS), and contrary to the Light Water Reactors characteristics, CRBRP does not contain any large storage of water which could serve as a potential "prompt source" to to the environmental liquid pathways. Therefore, only the radioactive material leached from the core debris by the local groundwater is likely to be transported to the Clinch River. This source was found in the LPGS to be considerably smaller than the "prompt source". Therefore, based on the preliminary appraisal of the liquid pathways, the staff concludes that the liquid pathways impacts of CRBRP would be probably smaller than those for the LWRs analyzed in the LPGS "Small River" site case.

#### CONCLUSION

The foregoing sections have evaluated the environmental impacts of a severe accident including potential radiation exposure to the population as a whole, the risk of near - and long-term adverse health effects that such exposures could entail, and the potential economic and societal consequences of accidental contamination of the environment. The overall assessment of environmental risk of accidents, assuming reasonable protective action, shows that it is significantly lower than the risk from light water reactors currently being licensed for operation, and the conclusions reached in the FES remain unchanged by this evaluation.