

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555 AUG 7 1984

Docket No. 50-354

R. L. Mittl, General Manager Nuclear Assurance and Regulation Public Service Electric & Gas Company 80 rark Plaza, T22A Newark, New Jersey 07101

Dear Mr. Mittl:

Pursuant to our letter to you dated March 5, 1984, which transmitted the Hope Creek Draft SER, enclosed are additional Draft SER sections resulting from staff review of the Hope Creek OL application.

The enclosure contains Draft SER Sections 6.5.1, 10.4.2, 10.4.3, 11.1 through 11.5 and 15.7.3. As noted within the text, based on our review of information submitted to date, the following items remain to be addressed:

- Submit a copy of the "process control program" (PCP) for solid radioactive waste; otherwise a license condition will require NRC approval of the PCP before solid radioactive waste is processed.
- 2. Regarding ESF filter testing, FSAR Table 6.8-6, page 6, table note b, states charcoal filter leakage testing is acceptable at a penetration of 0.25%. This value is inconsistent with Regulatory Guide 1.52 which requires in-place leakage testing for both HEPA and charcoal filters with an acceptance of less than 0.05% penetration. The licensee should correct this statement or provide justification for departure with Regulatory Guide 1.52.
- Regarding FSAR Table 6.8-6, page 7, note 3, change to read, "Field leak tests are conducted after each change of HEPA or charcoal filters in a system."
- Describe the Toxic Chemical detectors and associated instrumentation included in the Control Room Air Supply System.
- 5. Regarding the ESF and non-ESF air filtration unit drains, what keeps the air traps in the water drains filled with water? Is there an automatic fill system?

By letter dated July 24, 1984, you were requested to respond to items 2 through 5 above. Upon receipt, the staff will review your responses to determine their acceptability. Should additional information be required, a meeting with the staff may be in order.

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A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing

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Please contact us should you have any questions.

A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing

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Hope Creek

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#### 6.5 Engineered Safety Feature (ESF) Filter Systems

6.5.1 Introduction SYSTEM DESCRIPTION AND EVALUATION Section 6.5 of the Final Safety Analysis Report (FSAR) contains information pertaining to engineered safety feature (ESF) filter systems, their design bases, and applicable acceptance criteria.

#### 6.5.2 Acceptance Criteria

The staff has reviewed the applicant's design, design criteria, and design befaes for the ESF filter systems for the Hope Creek Generating Station. The acceptance criteria used as the basis for our evaluation are set forth in the Standard Review Plan (SRP) NUREG-0800, in Section II of SRP 6.5.1. These acceptance criteria include the applicable General Design Criteria (Appendix A to 10 CFR Part 50), ANSI Standard N509-1980, "Nuclear Power Plant Air Cleaning Units and Components," and ANSI Standard N510-1980, "Testing of Nuclear Air Cleaning Systems." Guidelines for implementation of the requirements of the acceptance criteria are provided in the ANSI Standards, Regulatory Guides, and other documents identified in Section II of the SRP. Conformance to the acceptance criteria provides the bases for concluding that the ESF filter systems meet the requirements of 10 CFR Part 50.

#### 6.5.3 Method of Review

The Hope Creek Station has two ESF filter systems, the Control Room Emergency Filter (CREF) System and the Filtration, Recirculation and Ventilation System (FRVS). Each of these systems was reviewed in accordance with the SRP. The results of these reviews are discussed below.

#### 6.5.4 Review Discussion

## 6.5.4.1 Control Room Emergency Air Filter System (CREES)

The function of the control room emergency filtration system is to supply non-radioactive air to the control room after a DBA and to pressurize the control room. This system will permit operating personnel to remain in the control room following a DBA. The CREFS is a redundant system; each train processes air at a flow rate of 4000 cfm (3000 cfm recirculation and 1000 cfm outside air). Each train contains the following components: fan, prefilter, electric heater, HEPA filter, carbon adsorber, and HEPA filter. The heating units are provided for relative humidity controls and a water spray system is provided in the event of high temperature or fire in the carbon beds. The equipment and components are designed to seismic Category I powered by Class IE buses and are located in a seismic Category I structure. The system will be automatically activated by an emergency signal and can also be activated manually from the control room. From the system description in the FSAR, we determined that the air cleanup system of the CREFS is designed consistent with GDC's 19, 61, and 64, as referenced in the SRP. In our evaluation of the system design efficiencies for removal of elemental iodine and organic iodine, we assigned the system decontamination efficiencies of 90% for normal and 99% for accident elemental and organic iodines for the CREFS charcoal adsorbers (one 4 inch deep bed) and 99% for particulates for the CREFS HEPA filters, in accordance with Regulatory Guides 1.140 and 1.52. Provisions for instrumentation, readout, and alarm were determined to be consistent with Table 6.5.1-1 of the SRP. Adequate indication and alarms are provided in the control room to assure proper monitoring of systems performance, as suggested in Regulatory Guide 1.52.

Based on the above determinations, we find that the CREFS is adequately designed to control the pressure and the concentration of radioactive materials in control room air in accordance with applicable regulations following a postulated DBA.

6.5.4.2 <u>Filtration Recirculation and Ventilation System (FRVS)</u> The function of the Filtration Recirculation and Ventilation System (FRVS) is to process the leakage of radioactive materials from the drywell into the Reactor Building following a design basis accident (DBA). The

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FRVS is a seismic Category I design. The FRVS consists of a recirculation system and an exhaust system. The recirculation system removes particulate and radioactive iodines from the reactor building air. It consists of six redundant 30,000 cfm filter units. Each unit is made up of the following components: a fan, moisture separator, electric heater, HEPA filter, 2-inch charcoal adsorber, HEPA filter, cooling coil and associated air flow, and temperature pressure and humidity instrumentation.

During a DBA, four of the six recirculation units are automatically started filtering and mixing at 120,000 cfm to the reactor building air. Part of this filtration, 9000 cfm, is further processed by the FRVS ventilation exhaust system. This exhaust system consists of two 100% redundant filtration units made up of a fan, electric heater, 2-inch deep charcoal adsorber, HEPA filter and associated flow, and temperature pressure and relative humidity instrumentation. This ventilation exhaust system also is automatically started on a DBA signal to maintain the reactor building at a negative differential pressure from the outside at greater than 0.25 inches of water. This negative differential pressure prevents air from being released to the environment without processing through the filter units.

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All the charcoal adsorbers in the FRVS systems are protected by a water deluge spray system in case of overheating or fire.

The allowed iodine removal credit for staff accident evaluations pertaining to reactor building releases is 99% removal for both elemental and organic iodine.

From the system description in the FSAR, we determined that the SGTS is designed consistent with GDC's 41, 42, 43, 61, and 64, as referenced in the SRP. In our evaluation of the system design efficiencies for removal of elemental iodine and organic iodines, we assigned the system decontamination efficiencies of 99% for accident and organic iodines for the FRVS carbon adsorbers (two 2-inch deep bed), in accordance with Regulatory Guides 1.52, and 99% for particulates for the FRVS HEPA filters. Provisions for instrumentation, readout, and alarm were determined to be consistent with Table 6.5.1-1 of the SRP. Adequate indication and alarms are provided in the control room to assure proper monitoring of system performance, as suggested by Regulatory Guide 1.52.

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#### 6.5.6 Evaluation Findings

The staff concludes that the design of the ESF atmosphere cleanup systems, including the equipment and instrumentation to control the release of radioactive materials in gaseous effluents following a postulated DBA, are acceptable. This conclusion is based on the applicant having met the requirements of GDC's 19, 41 and 61 by providing ESF atmosphere cleanup systems on the control room habitability, containment and associated systems. The applicant has met the requirements of GDC's 42, 43 and 64 by providing for inspecting and testing the ESF atmosphere cleanup systems and monitoring for radioactive materials in effluents from these systems. In meeting these regulations, the applicant has demonstrated that the design of the ESF atmosphere cleanup systems meet the guidelines of Regulatory Guide 1.52 and the ANSI N509 and N510 industry standards, as referenced in the SRP. We have reviewed the applicant's system descriptions and design criteria for the ESF atmosphere cleanup systems. Based on our evaluation, with respect to the SRP criteria, we find the proposed ESF atmosphere cleanup systems acceptable. The filter efficiencies given in Table 2 of Regulatory Guide 1.52 are appropriate for use in accident analyses.

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10.4.2 Main Condenser Evacuation System

10.4.2.1 Introduction

Section 10.4.2 of the Final Safety Analysis Report (FSAR) contains information pertaining to the main condenser evacuation (air removal) system, the system design bases, and the applicable acceptance criteria.

#### 10.4.2.2 Acceptance Criteria

The staff has reviewed the applicant's design, design criteria, and design bases for the main condenser evacuation system (MCES) for Hope Creek. Unit No. 1: The acceptance criteria used in our evaluation are those in the Standard Review Plan (SRP), NUREG-0800, in Section II of SRP 10.4.2. The SRP acceptance criteria include the applicable GDC (Appendix A to 10 CFR Part 50) and Heat Exchanger Institute Standard "Standards for Steam Surface Condensers." Guidelines for implementation of the requirements of the acceptance criteria are provided in the Regulatory Guides referenced in Section II of the SRP. Conformance to the acceptance criteria of the SRP provides the bases for concluding that the MCES meets the requirements of 10 CFR Part 50.

#### 10.4.2.3 Method of Review

The MCES was reviewed in accordance with the SRP. The results of the review are discussed below.

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#### 10.4.2.4 Review Discussion

The main condenser evacuation system is designed to (1) establish a vacuum on the condenser, and (2) remove noncondensible gases from the main condenser and discharge them to the gaseous radwaste system.

The major components are two 50% capacity mechanical vacuum pumps and redundant 100% capacity steam jet air ejector trains. The main condenser evacuation system is designed to minimize the potential for explosion in the piping upstream of the catalytic recombiners in the offgas system. This is achieved by mixing sufficient dilution steam via the steam jet air ejector discharge with the noncondensible gases to limit the hydrogen concentration to less than four percent by volume. The steam jet air ejectors, intercondenser, after condenser, and the offgas system (Section 11 of this report) are designed to withstand a detonation in the offgas system. The hydrogen concentration at the outlet of the third stage air ejector will be maintained below four volume percent hydrogen by virtue of the dilution steam. On indication of low steam pressure or low steam flow, the operating steam jet air ejector will be removed from service and the standby air ejector train activated. A hydrogen analyzer will be provided on the outlet of each recombiner so that action may be taken to preclude the buildup of explosive mixtures.

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Prior to startup, the mechanical vacuum pump is used to initially evacuate the main condenser to a vacuum level sufficient for the steam driven air ejectors to take over. Because the mechanical vacuum pumps are employed during startup operations, generally enough time has elapsed for radioactive decay to have significantly reduced the level of radioactive gases trapped within the main condenser. The main vacuum pump discharges the air to the environment out through the turbine building vent. The exhaust is continuously sampled for acceptable low concentration of activity by isokinetic radiation monitors located in the turbine building ventilation exhaust duct.

#### .10.4.2.5 Evaluation Findings

The main condenser evacuation system includes equipment and instruments to establish and maintain condenser vacuum and to prevent an uncontrolled release of gaseous radioactive material to the environment. The scope of our review included the system capability to transfer radioactive gases to the gaseous waste processing system or ventilation exhaust systems, and the design provisions incorporated to monitor and control releases of radioactive materials in effluents. The staff has reviewed the applicant's system descriptions, piping and instrumentation diagrams, and design criteria for the components of the main condenser evacuation system in accordance with the SRP.

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The staff concludes that the MCES design is acceptable in that the applicant has met the requirements of GDC's 60 and 64 with respect to the control and monitoring of releases of radioactive materials to the environment. The applicant has met the criteria for applying appropriate industrial standard5on the design of heat exchangers and air ejectors.

#### 10.4.3 Turbine Gland Sealing System

10.4.3.1 Introduction

Section 10.4.3 of the FSAR contains information pertaining to the turbine gland sealing system, the design bases, and applicable acceptance criteria.

10.4.3.2 Acceptance Criteria

The staff has reviewed the applicant's design, design criteria, and design bases for the turbine gland sealing system for Hope Creek. Unit No. 1. The acceptance criteria used as the basis for our evaluation are set forth in Section 10.4.3 of the Standard Review Plan (SRP) NUREG-0800. The acceptance criteria are the applicable GDC (Appendix A to 10 CFR Part 50) as referenced in the SRP. Guidelines for implementation of the requirements of the acceptance criteria are provided in the Regulatory Guides identified in Section II of the SRP. Conformance to the acceptance criteria provides the bases for concluding that the turbine gland sealing system meets the requirements of 10 CFR Part 50.

#### 10.4.3.3 Method of Review

The turbine gland sealing system for Hope Creek, <u>Huit T</u>, was reviewed in accordance with SRP 10.4.3. The results of the review are dicussed below.

#### 10.4.3.4 Review of Turbine Gland Sealing System

The turbine gland sealing system (TGSS) is designed to provide a continuous supply of slightly radioactive steam to the main turbine shaft seals, reactor feed pump turbine shaft seals, the stem packings of stop valves, control valves, and combined intermediate valves and bypass valves. This sealing steam is used to prevent air leaking out of the steam cycle into the Turbine Building.

The TGSS includes a steam seal evaporator whereby sealing steam is generated utilizing heat transferred by passing nuclear steam through an immersed tube bundle; instruments and controls to provide a source of sealing steam to the annulus space where the turbine and large steam valve shafts penetrate their casings; and a seal packing exhaust condenser

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and vacuum exhausters where the seal steam condenses. Any air admitted is exhausted through the turbine building vent. The scope of our review included the source of sealing steam and the provisions incorporated to monitor and control releases of radioactive material in gaseous effluents in accordance with GDC 60 and 64. We have reviewed the applicant's system descriptions and design criteria for the components of the TGSS and found them consistent with Regulatory Guide 1.26.

#### 10.4.3.5 Evaluation Findings

The staff concludes that the turbine gland sealing system design is acceptable in that the applicant has met the requirements of GDC 60 and 64 with respect to the control and monitoring of releases of radioactive materials to the environment.

#### 11.0 RADIOACTIVE WASTE MANAGEMENT

#### 11.1 Introduction

The radioactive waste management systems for Hope Creek, Herry, is designed to provide for the controlled handling and treatment of liquid, gaseous and solid wastes. The liquid waste system processes wastes from equipment and floor drains, sample wastes, decontamination and laboratory wastes, and chemical wastes. The gaseous radioactive waste system provides holdup capacity to allow decay of short-lived noble gases from the main condenser air ejector and treatment of ventilation exhausts through HEPA filters and carbon adsorbers as necessary to reduce releases of radioactive materials to "as low as is reasonably achievable" levels in accordance with 10 CFR Part 20 and 10 CFR Part 50.34a. The solid waste management system collects and processes wet and dry waste generated by the plant and packages the material into a solid product for shipment to a permanent disposal site. The radioactive waste management review includes process and effluent radiological monitoring and sampling systems.

#### 11.1.1 Acceptance Criteria

The staff has reviewed the applicant's design, design criteria and design bases for the radioactive waste management systems for the Hope Creek Station. The acceptance criteria used as the basis for our evaluation are set forth in the SRP, NUREG-0800, in Section II of SRPs 11.1, 11.2, 11.3, 11.4, and 11.5. These acceptance criteria include the applicable GDC (Appendix A to 10 CFR Part 50), Section 20.106 of 10 CFR Part 20, Appendix I to 10 CFR Part 50, and ANSI Standard N13.1, "Guide to Sampling Airborne Radioactive Materials in Nuclear Facilities." Guidelines -

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for implementation of the requirements of the acceptance criteria are provided in the ANSI Standards, Regulatory Guides, and other documents identified in Section II of the SRP. Conformance to the acceptance criteria provides the bases for concluding that the radioactive waste management systems meet the requirements of 10 CFR Parts 20 and 50.

### 11.1.2 Liquid and Gaseous Effluent Source Terms

The estimated releases of radioactive materials in liquid and gaseous effluents were calculated by the applicant using the BWR GALE Code described in NUREG-0016. The staff has reviewed these source terms and found them consistent with the guidelines of SRP 11.1. The applicant's source terms were used in our evaluation. These source terms are given in Table 11.1-1 of the FSAR. The principal parameters used in our calculations are given in Table 11.1 of this SER.

#### 11.2 Liquid Waste Management System

#### 11.2.1 System Description and Review

The liquid radioactive waste management system consists of process equipment and instrumentation necessary to collect, process and monitor and recycle or dispose of radioactive liquid wastes. The liquid wastes from operation of Hope Creek, Unit No. 1, will be collected and processed

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in five subsystems. The high purity liquid radwaste system is designed to collect and process wastes from equipment drains and other non-contaminated sources of reactor coolant. The low purity liquid radwaste system is designed to collect and process floor drain waste and other potentially contaminated waste. The regenerant chemical radwaste subsystem receives high conductivity waste from the condensate and radwaste demineralizer regeneration subsystem. It processes the residue from spent resin regeneration, concentrates the radioactive materials and delivers them for solid radwaste disposal. The Chemical Waste subsystem processes chemical lab drains and decontamination solutions and the fifth is the detergent drain waste subsystem that processes laundry and decontamination drains.

The liquid radwaste processing systems are designed to store processed water for eventual reuse in the plant. On occasion, for water inventory management, processed water will be released under controlled conditions to the environment. A radiation monitor in the plant discharge line will automatically terminate liquid waste discharges if radiation measurements exceed a predetermined level.

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The equipment drain subsystem processes the low conductivity, high purity wastes. Wastes will be processed through a precoated backwash filter and a mixed bed demineralizer before being stored in two waste sample tanks. From these tanks, the processed water is stored in the condensate storage tanks or a portion can be discharged to the environment. The licensee estimates the equipment drain subsystem will receive waste input flow at approximately 30,500 gallons per day. These inputs are consistent with SRP guidelines. Adequate initial tank storage (two 29,000 gallons) is provided to accommodate flexible operation and the process flow rate (180 gpm) is sufficient to treat the daily inputs within an adequate time frame (3 hours).

The floor drain subsystem processes higher conductivity, low purity wastes. Waste is initially collected in tanks (two 15,000 gal tanks) which later will be processed through a precoat backwash filter and a mixed bed demineralizer, in series, prior to being collected in the floor drain sample tanks. The applicant estimates the floor drain subsystem waste input to be approximately 4,700 gallons per day. The design process capacity of the floor drain subsystem is approximately 170 gallons per minute. This flow rate is sufficient to process the daily inputs within an acceptable time duration (1 hour).

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The regenerant waste subsystem will process resin regenerant from the condersate and radwaste demineralizers and also high conductivity waste from radwaste area drains. Wastes are first collected in waste neutralizer tanks where the material can be chemically neutralized. Then it is processed through an evaporator package where water is separated out and sent to the high purity waste system leaving a high concentrated mixture of resin regenerant and solids on the evaporator bottoms for processing to the concentrated waste tanks for interim storage. The concentrated waste is later sent to the solid waste processing system for solidification and disposal.

The chemical waste processing system collects laboratory wastes, decontamination solutions, sample rack drains, and filter drains in a 4,500 gal chemical waste tank. In this tank the solution can be chemically neutralized. These chemical wastes are normally evaporated to reduce volume. The concentrate is discharged to concentrated waste tanks for interim holdup prior to being sent to the solid waste system for solidification.

The detergent waste processing system collects laundry waste and personnel decontamination drain. The detergent waste are processed by filtration, monitored for radioactivity, and then discharged to the cooling tower blowdown.

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In our evaluation of the liquid radioactive waste management system, we considered: (1) the capability of the system for keeping the levels of radioactivity in effluents "as low as is reasonably achievable" based on expected radwaste inputs over the life of the plant, (2) the capability of the system to maintain releases below the limits in 10 CFR Part 20 and also to limit radiological doses to less than allowed by Appendix I to 10 CFR Part 50, during periods of fission product leakage at expected levels from the fuel, (3) the capability of the system to meet the processing demands of the station during anticipated operational occurrences, (4) the quality group and seismic design classification applied to the equipment and components and structures housing the system, and (5) the design features that are incorporated to control the releases of radioactive materials in accordance with GDC 60.

The estimated releases of radioactive materials in liquid effluents were calculated using the BWR GALE Code described in NUREG-0016 (Rev. 1). The principal parameters used in the staff calculations are given in Table 11.1 of this SER.

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#### 11.2.2 Evaluation Findings

The liquid radwaste systems include the equipment necessary to control the releases of radioactive materials in liquid effluents in accordance with GDC 60 and 61 of Appendix A of 10 CFR Parts 50 and 50.34a. Capacities of principal components considered in the liquid waste processing system evaluation are listed in Table 11.2-14 of the FSAR. The staff concludes that the design of the liquid waste management system is acceptable and meets the requirements of 10 CFR Part 20, Section 20.106; 10 CFR Part 50, Section 50.34a; GDC 60 and 61; and 10 CFR Part 50, Appendix I, as referenced in the SRP. This conclusion is based on the following:

- 1. The applicant has met the requirements of Section II.A of Appendix I of 10 CFR Part 50 with respect to dose limiting objectives by proposing a liquid radwaste treatment system that is capable of maintaining releases of radioactive materials in liquid effluents such that the calculated individual doses to an unrestricted area from all liquid pathways of exposure are less than 5 millirems/yr to the total body and less than 15 millirems/yr to any organ.
- 2. The staff has concluded that the applicant has met the requirements of the Commission's September 4, 1975 Annex to Appendix I of 10 CFR Part 50 with respect to meeting the site activity

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release limitations and "as low as reasonably achievable" criterion, and is, therefore, exempt from the cost-benefit analysis required by Section II.D of Appendix I to 10 CFR Part 50.

- 3. The applicant has met the requirements of 10 CFR Part 20, Section 20.106, since we have considered the potential consequences resulting from reactor operation and have determined that the concentrations of radioactive materials in liquid effluents in unrestricted areas will be a small fraction of the limits in 10 CFR Part 20, Appendix B, Table II, Column 2.
- 4. The applicant has met the requirements of GDC 60 and 61 with respect to controlling releases of radioactive material to the environment, since we have considered the capabilities of the proposed liquid radwaste treatment system to meet the demands of the plant due to anticipated operational occurrences and have concluded that the system capacity and design flexibility are adequate to meet the anticipated needs of the plant. We have reviewed the applicant's quality assurance provisions for the liquid radwaste systems, the quality group classifications used for system components, and the seismic design applied to structures housing these systems. The design of the systems and structures housing these systems meet the criteria as set forth in Regulatory Guide 1.143 (Rev. 1). We have

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reviewed the provisions incorporated in the applicant's design to control the release of radioactive materials in liquids due to inadvertent tank overflows and conclude that the measures proposed by the applicant are consistent with the criteria, as set forth in Regulatory Guide 1.143 (Rev. 1).

#### 11.3 Gaseous Waste Processing System

11.3.1 System Description and Review Dicussion The gaseous radioactive waste processing and plant ventilation systems are designed to collect, store, process, monitor, and discharge potentially radioactive gaseous wastes which are generated during normal operation of the plant. The systems consist of equipment and instrumentation necessary to reduce releases of radioactive gases and particulates to the environment. The principal sources of gaseous waste are the effluents from the gaseous waste processing system, condenser mechanical vacuum pumps, and ventilation exhausts from the reactor building, auxiliary building, drywell, and turbine building.

The gaseous waste processing system (GWPS) for Hope Creek is a main condenser air ejector charcoal system. This system collects, processes and stores fission product gases removed from the main condenser via air ejectors and then processes these gases through

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a recombiner, cooler/condenser, 10 minute delay pipe, followed by relative humidity reduction and then noble gas adsorption and decay through a series of ten cooled charcoal delay tanks. The gas discharge from the delay tanks passes through a HEPA filter and is discharged to the environment through the offgas building vent.

The reactor building ventilation exhaust system discharges air (98,000 cfm) from the reactor building and drywell purge to the atmosphere through HEPA filters only. After shutdown, prior to refueling, the drywell and torus atmosphere is recirculated for 30 hours for radioactivity removal by the containment prepurge cleanup system. This system consists of a roughing filter, electric heaters for humidity control, HEPA/charcoal/HEPA filters cascade, and a 3,000 cfm circulation fan. Gases released from radwaste system equipment vents (such as tanks, evaporator reliefs, phase separators, and solid waste fill casks) are passed through redundant HEPA/charcoal filtration units. The filtration unit consists of particulate removal, a heater element for humidity control, and a HEPA/charcoal/HEPA filter cascade. Exhaust flow from general spaces of the auxiliary building is filtered by HEPA filters only.

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Exhaust flow from the refueling floor of the reactor building is normally unfiltered unless activity is detected in the refueling flow exhaust duct. If the latter is the case, then the refueling floor exhaust flow is diverted through redundant HEPA/charcoal filtration units prior to release to the atmosphere. These filtration units are part of the Filtration Recirculation and Ventilation systems discussed in Section 6.5.4.2 of this SER.

The turbine building ventilation exhaust is unfiltered. However, the main condenser mechanical vacuum pump discharge is filtered by the HEPA filters of the Reactor Building Ventilation Exhaust system.

The major source of gaseous radwaste during normal plant operation will be offgas from the main condenser. Hope Creek has an offgas system consisting of catalytic hydrogen-oxygen recombiners, a ten-minute holdup pipe to permit decay of short-lived radioisotopes, relative humidity reduction, a 65°F charcoal (RECHAR) delay train, and a HEPA filter. All active components are redundant. The recombiners are sized to maintain hydrogen concentration below four percent; dual hydrogen analyzers are provided to monitor hydrogen concentration and, additionally, the offgas system is designed to withstand the effects of a hydrogen detonation. The nine charcoal beds and one charcoal guard bed are maintained at

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approximately 65°F by redundant heating and air conditioning systems. The gaseous waste processing system and the plant ventilation systems are described in Sections 11.3 and 9.4 of the FSAR, respectively, with design details provided separately in proprietary documents.

In our evaluation of the gaseous radwaste management system, we considered the following SRP criteria: (1) the capability of the system for keeping the levels of radioactivity in effluents "as low as is reasonably achievable" based on expected radwaste inputs over the life of the plant, (2) the capability of the system to maintain releases below the limits in 10 CFR Part 20 during periods of fission product leakage at expected levels from the fuel, (3) the capability of the system to meet the processing demands of the station during anticipated operational occurrences, (4) the seismic design classification applied to the equipment and components and structures housing the system, (5) the design features that are incorporated to control the releases of radioactive materials in accordance with GDC 60, and (6) the potential for gaseous releases due to hydrogen explosion in the gaseous radwaste system.

The estimated releases of radioactive materials in gaseous effluents were calculated by the staff using the BWR GALE Code described in NUREG-0016

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(Rev. 1), "Calculation of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Boiling Water Reactors (BWRs)." The principal parameters used in these calculations are given in Table 11.1 of this SER. The gaseous source term is provided in Table 11.1-1 of the applicant's FSAR.

We have reviewed the applicant's quality assurance provisions for the gaseous radwaste systems, the quality group classifications used for system components, the seismic design criteria applied to the design of the system, and of structures housing the radwaste systems. The design of the system and structures housing these systems meet the criteria as set forth in Regulatory Guide 1.143 (Rev. 1) and referenced in the SRP.

We have reviewed the provisions incorporated in the applicant's design to control releases due to hydrogen explosions in the gaseous radwaste system and conclude that the measures proposed by the applicant are adequate to prevent the occurrences of an explosion or to withstand the effects of a hydrogen detonation.

We have reviewed the provisions incorporated in the applicant's design to collect airborne radioactivity materials in the normal ventilation

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exhaust systems during normal plant operation, including anticipated operational occurrences. We find the design of air filtration and adsorption units consistent with Regulatory Guide 1.140 (Rev. 1), as referenced in the SRP.

#### 11.3.2 Evaluation Findings

The staff concludes that the design of the gaseous waste management system is acceptable and meets the requirements of 10 CFR Part 20, Section 20.106; 10 CFR Part 50, Section 50.34a; GDC 3, 60 and 61; and 10 CFR Part 50, Appendix I, as referenced in the SRP. This conclusion is based on the following findings:

- 1. The applicant has met the requirements of GDC 60 and 64 with respect to controlling releases of radioactive material to the environment by assuring that the design of the gaseous waste management system includes the equipment and instruments necessary to detect and to control the release of radioactive materials in gaseous effluents. Capacities of principal components considered in the gaseous waste processing system evaluation are listed in Table 11.2.
- The applicant has met the requirements of Appendix I of 10 CFR Part 50 by meeting the "as low as is reasonably achievable"

criterion as follows:

- a. Regarding Section II.B and II.C of Appendix I, we have considered releases of radioactive material (noble gases, radioiodine and particulates) in gaseous effluents for normal operation including anticipated operational occurrences based on expected radwaste inputs over the life of the plant. We have determined that the proposed gaseous waste management system is capable of limiting releases of radioactive materials in gaseous effluents such that the calculated individual doses in an unrestricted area from all pathways of exposure are less than 5 mrems to the total body or 15 mrems to the skin and less than 15 mrems to any organ from releases of radioiodine and radioactive material in particulate form.
- b. The applicant has met the requirements of the Commission's September 4, 1975 Annex to Appendix I to 10 CFR Part 50 with respect to meeting the siting limits and "as low as reasonably achievable" criterion, and is, therefore, exempt from the cost-benefit analysis required by Section II.D of Appendix I to 10 CFR Part 50.
- 3. The applicant has met the requirements of 10 CFR Part 20 since we have considered the potential consequences resulting from reactor operation with "a fission product release rate consistent with a

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noble gas release rate to the reactor coolant of 100 uCi/MWt-sec at 30 minutes decay" for a BWR and determined that under these conditions, the concentrations of radioactive materials in gaseous effluents in unrestricted areas will be a small fraction of the limits specified in 10 CFR Part 20, Appendix B, Table II, Column 1.

- 4. We have considered the capabilities of the proposed gaseous waste management system to meet the demands of the plant due to anticipated operational occurrences and have concluded that the system capacity and design flexibility are adequate to meet these demands.
- 5. We have reviewed the applicant's quality assurance provisions for the gaseous waste management system, the quality group classifications used for system components, the seismic design applied to the design of the system, and of structures housing the radwaste system. The design of the system and of structures housing the system meet the criteria as set forth in Regulatory Guide 1.143 (Rev. 1).
- 6. We have reviewed the provisions incorporated in the applicant's design to control releases due to hydrogen explosions in the gaseous waste management system and concluded that the measures proposed by the applicant are adequate to prevent the occurrence of an explosion and to withstand the effects of a hydrogen detonation in accordance with GDC 3 of Appendix A to 10 CFR Part 50.

#### 11.4 Solid Waste Management System

#### 11.4.1 Solid Waste Management System

The Hope Creek solid waste management system accepts dry solid waste, evaporator bottoms concentrate, spent powdered and bead resin, filter media slurries, and sludges from phase separators. In summary, the solid waste processing system achieves a volume reduction by mechanically removing free-standing water and by water evaporation. These low water content waste products are then mixed with asphalt at high temperatures and then extruded into 55 gallon drums where the product cools and solidifies. The drums are then capped, checked for surface contamination and stored for shipment offsite.

This volume reduction and solidification process is offered by Werner and Pfleiderer and is described in Topical Report "Radwaste Volume Reduction and Solidification System," WPC-VRS-1 (WFC-VRS-1P, Proprietary). This system design was approved by NRC in the Topical SER dated April 12, 1978 (NRC letter from Karl Kniel, Program Manager, Light Water Reactors Branch No. 2, Division of Project Management to Richard Doyle, Werner and Pfleiderer). Adequate fire protection features must be provided by the licensee to prevent radioactivity releases from a fire related accident.

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#### 11.4.2 Evaluation Findings

Based on the information submitted by the applicant, the staff has made the following conclusion:

- a. The design of the solid waste management system meets the requirements of 10 CFR Parts 20 and 20.106; 10 CFR Parts 50 and 50.34a; GDC 60, 63 and 64; and 10 CFR Part 71.
- b. Sufficient solid waste storage capacity (30 days at normal processing rates) meet the requirement of Branch Technical Position ETSB 11-3.
- c. The system proposed design meets the quality assurance group classification and seismic requirement as recommended in Regulatory Guide 1.143 (Rev. 1) for solid radwaste systems.
- d. Insufficient information has been provided regarding the details of a solid waste process control program and solid waste requirements of 10 CFR Part 61. Therefore, prior to solid waste processing, the applicant must obtain NRC approval of the solid waste process control program addressing the requirements of 10 CFR Part 61 and Branch Technical Position ETSB 11-3.
- e. A fire protection water spray system is provided to protect the process equipment and solid waste product.

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# 11.5 Process and Effluent Radiological Monitoring and Sampling Systems 11.5.1 System Description and Review Discussion

The process and effluent radiological monitoring systems are designed to provide information concerning radioactivity levels in systems throughout the plant, indicate radioactive leakage between systems, monitor equipment performance, and monitor and control radioactivity levels in plant discharges to the environs.

Table 11.3 provides the proposed locations of continuous monitors. Monitors on certain effluent release lines will automatically terminate discharges in the event that radiation levels exceed a predetermined value. Systems which are not amenable to continuous monitoring, or for which detailed isotopic analyses are required, will be periodically sampled and the samples will be analyzed in the plant laboratory.

All normal airborne radioactive releases to the environs from Hope Creek are from two principal points: (1) the south plant vent (which releases at 115 ft above grade the reactor building exhaust, drywell purges, turbine building exhaust, radwaste area exhaust, mechanical vacuum pump exhaust, and auxiliary building exhaust), and (2) the north plant vent at

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115 ft above grade (which discharges the condenser offgas processed by the offgas system, the solid radwaste building ventilation exhaust and chemistry lab exhaust system).

During an accident, reactor building air processed by the filtration recirculation ventilation system is discharged at the top of the reactor building.

Redundant radiation monitors are installed in these vents. They sample effluent air downstream of the last point of mixing and provide continuous readout of noble gas and particulate activity. In addition, charcoal adsorbers are provided to sample the air stream for radioiodine. Sampling flow is through a regulated isokinetic probe.

In addition to the two principal plant vent discharge point monitors, ventilation radiation monitors are also provided in the exhaust streams of the reactor building, auxiliary building, drywell purge, turbine building, radwaste areas, offgas building, and technical support center. These monitors are used to identify sources of airborne activity prior to mixing and dilution in the plant exhaust vents.

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The principal radioactive liquid effluent release point at Hope Creek is the cooling tower water blowdown. Potentially radioactive inputs to the cooling tower blowdown from liquid radwaste discharges will be continuously monitored for radioactivity prior to and during discharge. Since the cooling tower blowdown is a high flow rate system, the radioactive inputs to the system will be highly diluted. These principal radioactive input streams to the blowdown leg of the circulating water system are continuously monitored (process monitors) and periodically sampled and analyzed. These input streams are the liquid radwaste effluent discharge and the turbine building circulating water sump discharge. The liquid radwaste discharge process monitors provide alarm signals for termination of discharge of the liquid radwaste system in the event a predetermined Technical Specification limit is exceeded.

Also, process liquid radiation monitors are used in the closed cooling water system of the reactor auxiliaries cooling system and the safety auxiliaries cooling system to detect any heat exchanger leakage.

#### 11.5.2 Evaluation Findings

Our review included the locations and types of effluent and process monitoring provided for Hope Creek. Hult No. 1. Based on the plant

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design and on continuous monitoring locations and intermittent sampling locations, we concluded that all normal and potential release pathways will be monitored. The applicant's description indicates that the process and effluent monitoring system design meets the guidelines in Regulatory Guide 4.15 for quality assurance. We also determined that the sampling and monitoring provisions are adequate for detecting radioactive material leakage to normally uncontaminated systems and for monitoring plant processes which could affect radioactivity releases. On these bases, we consider that the monitoring and sampling provisions meet the requirements of GDC 60, 53 and 64 and the guidelines of Regulatory Guide 1.21 (Rev. 1), and, therefore, meet the acceptance criteria of the SRP. In addition, the applicant has provided appropriate effluent monitors for post accident conditions in accordance with the guidelines of NUREG-0737.

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Table 11.1 PRINCIPAL PARAMETERS FOR THE CALCULATION OF RADIOACTIVE EFFLUENTS FROM HOPE CREEK, UNIT NO. 1

Thermal power Capacity factor Total steam flow (10 lb/hr) Mass water, reactor vessel (10 lb) Cleanup demineralizer flow (10 lb/hr) Fraction of feedwater through condenser demineralizer Condensate demineralizer regeneration time (days) Air ejector offgas holdup (hours) Reactor building iodine release fraction Reactor building particulate release fraction Auxiliary building particulate release fraction Radwaste building iodine release fraction Radwaste building narticulate release fraction	3430 MWt 0.8 14.0 0.38 0.13 1.0 30.0 0.17 1.0 0.01 1.0 1.0 1.0 1.0
Changes 1 delaw system	0.01
Charcoal delay system Krypton adsorption coefficient (cm /g) Xenon adsorption coefficient (cm /g) Krypton holdup time, days Xenon holdup time, days Mass of charcoal (tons) Liquid waste inputs High purity system 37,100 gallons per day 0.130 Primary coolant activity (PCA) 0.01 Discharge fraction 0.53 Days, collection 0.90 Days, decay 10 Decontamination factor (DF) Iodine 10 Decontamination factor (DF) Cesium 10 Decontamination factor (DF) Other Nuclides	18.5 330.0 3.12 55.8 161
Low purity system	
5,700 gallons per day 0.001 Primary coolant activity (PCA) 0.5 Discharge fraction 2.1 Days, collection 0.07 Days, decay	
10 Decontamination factor (DF) Iodine	
2 Decontamination factor (DF) Cesium	
10 Decontamination factor (DF) Other Nuclides	

#### Table 11.1 (Continued)

Chemical waste system

600 gallons per day (include radwaste demineralizer regenerant) 0.02 Primary coolant activity (PCA) 0.0 Discharge fraction

2.7 Days, collection

0.22 Days, decay

10 Decontamination factor (DF) Iodine 10 Decontamination factor (DF) Cesium

10 Decontamination factor (DF) Other Nuclides

Regenerant Solutions

6,290 gallons per day 0.10 Discharge fraction

0.0 Days, collection

0.35 Days, decay

10 Decontamination factor (DF) Iodine

10 Decontamination factor (DF) Cesium

10 Decontamination factor (DF) Other nuclides

## Table 11.2

## DESIGN PARAMETERS OF PRINCIPAL COMPONENTS CONSIDERED IN THE EVALUATION OF LIQUID AND GASEOUS RADIOACTIVE WASTE TREATMENT SYSTEMS

Component	Number	Capaci	ty, Each
Equipment (High Purity) Drain Processing			
Waste collector tanks Surge tank Pre-Coat equipment drain filter Mixed bed demineralizer Equipment drain sample tank	2 1 1 1 2	29,000 61,500 180 15,550	gallons gallons gpm gpm gallons
Floor Drain Processing System			
Floor drain collector tank Pre-Coat filter Mixed bed demineralizer Floor drain sample tanks	2 1 1 2	15,00C 180 180 15,550	gallons gpm gpm gallons
Regenerant Waste Processing System			
Waste neutralizing tanks Waste evaporator Concentrated waste storage tanks	2 2 2	25,000 40 10,550	gallons gpm gallons
Chemical Waste Processing System			
Chemical waste tank Chemical waste evaporator Chemical waste concentrated solution storage tank	1 1 1	4,000 5 600	gallons gpm gallons
Gaseous Waste Processing System			
Mass of charcoal Noble gas delay at 77°F		161	tons
Krypton Xenon		3.1 55.8	days days

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#### TABLE 11.3

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#### HOPE CREEK RADIATION MONITOBING SYSTEMS

Finisus Number Detectable RAS Identification of Detector Detector Desscietian. ani\_Ref. Concen-Chappels Type(15)(14) Location(17) Bange tration(1). Main steas line Gassa ion Downstream 1-10\*\*8/b 1 mB/h(13) 11.5.2.1.1 chasper outboard of MSIVs El. 137, Area 26 Refueling floor 3 . Beta-Upstream 10-3-102µC/cc Kr-85 10-3 erhaust scint of damper PC/cc 11.5.2.1.2 El. 205, Area 15 at 2.5 sR/br MPP(7) Reactor building 3 Beta-10-3-10-10C/CC KE-85 10-3 Upstream erhaust scint of damper µC/cc 11.5.2.1.3 El. 189, Area 15 Control coom 2 Beta-Air inlet 10-7-10-" UC/CC KE-85 10-" UC/CC ventilation scint plena 11.5.2.1.4 21. 162, Area 26 Dryvell atmosphere 2 Gassa ion Inside 1-1078/h 1 B/b(14) post-accident chamber containment MFP(7)(10) 11.5.2.1.5 El. 145, Area 17 Morth plant vent(11) Sample 11.5.2.2.1 panel El. 153, Area 32 Particulates 1 Beta scint 5x10-12-1x10-4 5x10-12 µC/cc Sr-90 µC/cc(4) Isline 1 Gamma scint 1.1x10-5-1.1x10-11 1. 1x 10-11 µC/cc I-131 UC/cc1+) Saseous 2 Beta scint 10-4-101 10-4 (normal range) µC/cc Kr-85 µC/cc(+) Gaana G-M(12) 5-10" µC/cc Kr-85 5µC/cc (extended range)

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TABLE 11.3 (cont)

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RMS Identific Description_sol_Bef.	Number of Channels		Detector Type(15)(16)	Detector Location(17)	_Bange	Dinimum Detectable Concen- tration(1).	
South plant vent(11) 11.5.2.2.2				Sample panel El. 155, Area 32			1
Particulates	1	1	Beta scint		5x10-12 -1x10-+ µC/cc Sr-90	5x10-12	1
Iodine	1		Gamma scint		1.1x10-8-1.1x10-11 pC/cc I-131	1.5x10-11	1
Gaseous	2		Beta scint (normal range)		1010: pC/cc Kr-85	10-•µC/cc	
			Gamma G-M(12) (extended range)		5-10" #C/cg Kr-85	5µC/cc	
Piltration, recirc- ulation venti- lation system(*) 11.5.2.2.3	2			Sa∎ple panel Bl. 153, Area 72			
Gaseous			Beta scint (normal range)		10-4-101 VC/CC KE-85	10-+uC/cc V	1
Giseous			Gamma G-N (extended range)		5-10" µC/cc Kr-85	5 µC/cc /	1
Cooling tower blowdown 11.5.2.2.4	1		Ga∎∎a scint	Effluent to Delaware B Building 9	10-7-10-2 pC/cc Cs-137	1x10-7µC/cc	1
Liquid radwaste 11.5.2.2.5	'		Gamma scint	Shielded sampler El. 58, Area 35	5.8x10-7-5.8x10-2 µC/cc Cs-137	5.8x10-*uC/cc(	
Off 78 9 11.5.2.2.6	2		Gassa ion chasber	Inlet to sample panel OC-335/J034 El. 87, Area 36	1-104 aB/b	1 sR∕b	1
Offgas treatment system 11.5.2.2.7	2		Gamma scint	Downstream of outlet HEPA filter, at sampler	1.5x10-3-1.5 µC/cc Kr-85	1-5x10-5µC/cc	-
				B1. 54, Area 38			1

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TABLE 11.3 (cont)

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RMS Identific Distriction_and_Befr	Number of Chappels	Detector Type(13)(14)	Detector Location(17)	_Babag	Binisus Detectable Concen- tration(1).
Reactor building vantilation system exhaust 11.5.2.2.8		Beta scint	Downstream of HEPA 6 charcoal filters El. 165, Area 32	10-4-10-1 µC/cc Kr-85	1x10-*µC/cc
Tarbine building erbaust 11.5.2.2.9	* 1	Beta scint	Upstream of junction with south stack El. 171, Area 10	10-0-10-1 µC/cc Kr-85	1x10-4µC/cc at 2.5 aR/h BPP(7)
Tarbine building compartment exhaust 11.5.2.2.10	1	Beta scint	Upstream of function with turbine bldg exhaust Bl. 158, Area 12	10-4-10-1 µC/cc Kr-85	1x10-* pC/cc at 2.5 s8/b HPP(*)
Ridvaste exbaust system 11.5.2.2.11	1	Beta scint	Downstream of filters Pl. 175, Area 32	1010-1 µC/cc Kr-85	1x10-4µC/cc
Ridviste area erhiust 11.5.2.2.12	1	Beta scint	Opstream of filters Bl. 164, Area 35	10-4-10-1 µC/cc Kt-85	1x10-*µC/cc
Saseous tidwaste acei exbaust 11.5.2.2.13	'.	Beta scint	Becombiner exhaust duct El. 70, Area 35	1010-1 µC/cc Kr-85	1x10-4µC/cc at 2.5 mR/b MPP(7)
Technical support center ventilation 11.5.2.2.14	1	Beta scint	Air inlet plenum Bl. 162, Area 73	5x10-*-10-1 µC/cc Kr-85	5x10-4µC/cc
Dcyvell leak- detection 11.5.2.2.15	1	Beta scint	Sample panel El. 162, Area 17	10-4-10-1 µC/cc Kr-85	1x10-*µC/cc at 2.5 sB/b spp(7)(*)(*)
Reactor auxiliaries cooling system 11.5.2.2.15		Gansa scint	Shielded sampler El. 77, Area 23	5.4x10-7-5.4x10-2 µC1/cc Cs-137	5.4110-7µC/cc at 2:5 aB/h BFP(7)(*)
Safety auxiliaries cooling system 11.5.2.2.17	2	Gamma scint	Shielded sampler El. 102, Area 23	5.4x10-7-5.4x10-2 µC1/cc Cs-137	5.4x10-7µC/cc at 2.5 a8/b MFP(7)(e)

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TABLE 11.3 (cont)

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RAS Identific Descletion_sol_Befr	Pasber of Shappels	Detector	Detector Location(17)	_Babge:_	Sinisus Detectable Concep- tration(1)
Resting steam conjensite, waste 11.5.2.2.18	1.	Gamma scint	Shielded sampler Bl. 94, Area 32	5.4x10-7-5.4x10-2 µC/cc Cs-137	5.4x10-7µC/cc at 2.5 mR/h MPP(7)
Heating steam conden- sate, jecontamination 11.5.2.2.19	1.	Gansa scint	Shielded sampler El. 54, Area 35	5.4x10-7-5.4x10-2 µC/cc Cs-137	5.4x10-7µC/cc at 2.5 mB/b MPP(7)
Tarbiae bailding circulating water 11.5.2.2.20	'	Gamma scint	Shielded sampler El. 58, Area 01	5.8x10-7-5.8x10-2 µC/cc Cs-137	5.8x10-7µC/cc at 2.5 #B/h B7P(7)

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(1) Misisum detectable concentration with the detector in a 1 mB/h field unless stated otherwise.

- (2) Deleted
- ()) Deleted
- (\*) The 10 CFR 50 Appendix I celease monitoring function is performed by the MPV MMS and SPV RMS, and the liquid radwaste.
- (3) The expected MPP concentrations are not expected to be measurable by the CTB BMS. Because the cooling tower will concentrate the river water by factors of 5-10, the naturally occurring K-40 concentration in the blowdown released back to the river can be as high as  $1x10^{-7} \ \mu C/cc$  or about 200 times greater than the plant releases of gamma emitters.

(\*) Pirticulates and halogens are sampled and removed for onsite analysis

- (7) MPP = Mixed fission products.
- (\*) Mired fission products, reactor water.
- (\*) Mired flasion products, reactor steam.

(10) Mirad fission projucts, initial post-LOCA drywell atmosphere.

(ii)Particulates and halogens above normal range are sampled and removed for onsite analysis.

(12) The MPY RMS and SPY PMS gaseous monitors include an extended range monitor in order to comply with the Regulatory Guile 1.97, Revision 2, Table 1, Type E variable for other identified releases sources. The RMS are Category 2.

## TABLE 11.3 (cont)

(13) This detector is calibrated in mR/h. The MSL-RMS function is to detect major failures in the fuel cladding. Under normal conditions the fission products from fuel leakage will be masked by several oriers of magnitude by the reactor coolant products.

(1\*) This letector is calibrated in mR/h. The function of the DAPA-BMS is to provide a radiation evelation of the containment atmosphere during postulated post-accident conditions.

(15)Datector check sources are as follows:

becector type	Check source isotope	Quantity in microcuries
Liquid and iodine (gamma scint)	Cs - 137	9
Gaseous (beta scint)	C1 - 36	9
Gaseous, extended range (gamma G-N)	sr - 96	0.1
DAPA-BOS	0-234/238	6-6E-5 (keep-alive source

(14) The calibration transfer sources will be purchased by the supplier early in 1984. These transfer sources will be traceable to the National Bureau of Standards (NBS) either by direct NBS calibration or by comparison to NBS calibrated sources.

(17) See Figure 1.2-44 for the plant area designations.

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15.7.3 Postulated Radioactive Releases Due to Liquid Tank Failures According to the Standard Review Plan, the radioactivity in liquid tanks outside the containment should be limited so that a tank rupture will not result in radioactivity concentrations at the nearest drinking water source in excess of 10 CFR Part 20, Appendix B, Table II, Column 2 limits. The hydrologic characteristics of the Hope Creek site are such that any spilled liquid on top of the ground (such as from rupture of the . condensate storage tank) or released via perculation through the ground (such as rupture of the waste evaporator concentrate hold tank and subsequent failure of the concrete floors housing the tanks within the radwaste building) will only be received by the salt water of the Delaware Estuary. Consequently, there are no fresh water drinking water sources that can be contaminated by spilled radioactive liquids. Accordingly, the staff has not performed a liquid radwaste tank failure analysis because the Hope Creek site satisfies the requirements (i.e., there is no fresh drinking water source that can be contaminated).