

UNITED STATES NUCLEAR REGULATORY COMMISSION

April 10, 1992

NOTE TO: Jack Duncan, GE

Glenn Kelly, PRAB, DREP, NRR FROM:

Hern Kille

SUBJECT: INITIAL CONCERNS RAISED BY ACRS ABOUT RWCU AND YOCAS OUTSIDE OF CONTAINMENT

As we discussed on the phone today, I am sending you a copy of early thoughts generated by the ACRS about some problems with how you took credit for the RWCU and FW systems in high pressure sequences in the ABWR PRA. There is also a concern about your evaluation of LOCAs outside of containment. We are just beginning to focus on these new issues and will be in discussion with you about them shortly.

Enclosure: as stated

RWCU PRA ISSUES FOR ABWR.

D HEAT REMOVAL FOR HIGH PRES. SEQUENCES DINITIATOR FOR LARGE LOCA OUTSIDE CONT.

D HEAT REMOVAL

. No fault the in SSAR · Credit taken as C.I for HP sequences (see Jable 19.0.4-2) all seg with Wi heading. only RHX bypass needed in write-up. this ignores need for resin bed isolation, remperature effects due to 500° to 95° ST on NRHX tubes, exit stemp for RWCU and RBCCW system piping exceeding : design limits, and isolation feature of is between NHRX and pumps.

Credit also taken in W, for NHR (normal heat removal via feedwater & condinan) at 0.01.

- ignores part that Q(at 0.05) already failed in sequences with WI(a includes FW). (also applies to seq. W/ W2 and W7) Changes if credit not taken for RWCU or NHR

Figure	Î.S.	OLD SER NEW EG
1904-1	Rx SD	2.74 E-8 (W.) 2.74 E-5
1904-2	Non lool	1.72 E - 11 (W2) 1.72 E - 9 1.76 E - 8 (W,) 1.76 E - 5
19 84-3	LOFW	1.10 E-11 (W2) 1.10 E-9 4.45 E-8 (W,) 4.45 E-5
1904-5	LOSP	2.78 E-11 (W2) 2.78 E-9 1.27 E-8 (W1) 1.27 E-7 *
1909-6	LOSP	5,53 E-11 (W,) 5.53 E-10 * 8.11 E-9 (W,) 8.11 E-8 *
1904-11	IORV	3.59 E-11 (W,) 3.54 E-10 X- 2.59 E-9 (W7) 2.59 E-7
1909-12	Sm LOCA	3.10 E-12 (W2) 3.10E-10 6.22 E-10 (W,) 6.22 E-9 +
1921-13-	Med_toca===	7445-12 (003) 7.135-16-
Nacional Antonio antoni	TOTALS	1.18-7 8.98-5
		1 a factor of 809
+ LEFT , SEQUENT	N CREDIT FOR	NHR SINCE Q NOT ON THESE

@ INITIATOR FOR LARGE LOCA OUTSIDE CONT.

Based on natio of hypothetical consequences in section 192. 2. 3:3

3

There are many errors here, but the biggest is in the last A of section 1982.3.3.1. It fails to take into account that the cause of the cores melt scenario may have been a failure the in the bypass line (such as RWCU or FW or relic steam etc).

The flow fraction ti ratios flow from a line to the acrosol generation rate. To properly use the ratio of consequences argument it should be natioed with the leakage rate from other non-bypass paths. This factor artificially reduces the prob. numbers between 1 to 5 orders of magnitude

Jormula in equation 7 is wrong (62 sent FAX with corrected version)





GE Nuclear Ene	NGY
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ABWR	
Date 4/3	192
Fax No.	

To

Chet Poslusny

This page plus 3_ page(s) From Jack Fox Mail Code 175 Curtner Avenue San Jose, CA 95125 Phone (408) 925- 4824

FAX (408) 925-1193 or (408) 925-1687

Subject Control Rod Criteria

Message "Internal response to your letter dated January 28,1992. Myself, Bob Winang and Paul van Diemen will be participating in the IPM EST conference call (my office) on Monday 4/6/92. If possible we might also cover Paul's recommended change Jack

GE NUCLEAR ENERGY San Jose, California

March 12, 1992

cc: AJ James JE Wood PVD:92013

To: J.N. Fox G.G. Jones

SUBJECT: SEAR Control Rod Design Criteria (ABWR)

Reference: C. Poslusny to P. Marriott, Control Rod Design Criteria, Docket No. 50-605, January 28, 1991

The Reference letter provides recommended changes to the control rod design criteria contained in Section 4C.2 of 23A6100AB Rev. C. The recommended wording changes in 4C.1 (Introduction) and the first sentence in 4C.2 are acceptable. While we accept the substance of the NRC recommended changes in the 4 acceptance criteria, we believe the recommended changes are conditions which may be more appropriate to include in 4C.3 (Basis For Acceptance Criteria).

Regardless of where the additional wording is located, any reference to sheath material should be avoided since this is a feature not common to all GE control rod designs. Instead, the wording should identify the phenomena of concern, i.e., crudding, crevices and stress corrosion, and not the piece parts which were affected in older designs.

A fifth criteria (Surveillance) has been added per the Reference letter along with the corresponding Acceptance Criteria, 40.3.5.

The GE recommended wording changes for Section 4C is attached.

Please provide an appropriate response to the reference letter.

Paul van Diemen Fuel Design and Development M/C 148, ext. 56160

4C.2 GENERAL CRITERIA

(5) A surveillance program shall be implemented if a change in design features such as new absorber material or structural material not previously used in reactor cores could impact the function of the control rod.

4C.3.5 SURVEILLANCE PROGRAM

Visual inspection of the lead depletion control rod design possessing the new design feature and three additional control rods of such design that are within 15% of the estimated fast fluence of the lead control rod shall be performed. If fewer than three control rods are within 15% of the estimated fast fluence of the lead control rod, only those within 15% shall be inspected. Should evidence of a problem arise, arrangements will be made to inspect additional control rods to the extent necessary to identify the root cause of the problem.

General Electric Company PROPRIETARY DEFORMATION Class III

2146100AB Boy C

4C.1 INTRODUCTION

THE BASIS FOR

A set of acceptance criteria bas beep established for evaluating new control rod designs Control rod compliance with these criteria constitutes USNRC acceptance and approval of the design, without opposite Listing control rod licensing acceptance criteria : nd their bases are provided below. Control rou designs which have been approved by the USNRC or which meet the licensing acceptance criteria are documented in Reference 4C-4.

4C.2 GENERAL CRITERIA

MUST

Control rod des'gnsameeting-the following acceptance criteriz are-analidarad-ca-be-approved and do not require specific by MRE review.

- (1) The control red stresses, strains, and cumulative fatigue shall be evaluated to not exceed the ultimate stress or strain of the material.
- (2) The control rod shall be evaluated to be capable of insertion into the core during all modes of plant operation within the limits assumed in the plant analyses.
- (3) The material of the control rod shall be shown to be compatible with the reactor environment.
- (4) The reactivity worth of the control rod shall be included in the plant core analyses.

4C.3 BASIS FOR ACCEPTANCE CRITERIA

The following are the basis for the licensing acceptance criteria given in Section 4C.2.

eC.3.1 Stress, Strain and Fatigue

Amendment 11 CT+C3.5

The control rod is evaluated to assure that it does por fail because of loads due to shipping, handling, and normal, abnormal, emergency, and faulted operating modes. To assure that the control rod does not fail, these loads must not exceed the pltimate stress and strain limit of the materials Fatigue must not exceed a fatigue usage factor of 1.0.

INCLUDING IARADIAMON EFFERTS FOR ITS DESIGN LIFE. The loads evaluated include those due to normal operational transients (scram and jogging), pressure differentials, thermal gradicuts, flow and

SEE ATTACH -D

system induced vibration, and irradiation growth in addition to the lateral and vertical loads expected for each condition. Fatigue usage is based upon the cumulative effect of the cyclic loadings. The analyses include corrosion and crud deposition as a function of time as appropriate.

Conservatism is included in the aualyses by including margin to the limit or by assuming loads greater than expected for each condition. Higher loads can be incorporated into the analyses by increasing the load itself or by statistically considering the uncertainties in the value of the load.

C3.2 Control Rod Insertion

AND THROUGHOUT ITS DESIGN LIFE.

The control and is evaluated to be sure that it can be 'userted during normal, abnormal, emergency and farmed modes of operation within the limits assumed in the plant analyses. These evaluations include a combination of analyses of the geometrical clearance and actual testing. The analyses consider the effects of manufacturing tok - ances, swelling and irradiating growth. Tests may be performed to demonstrate control rod insertion capability for conditions such as coatrol rod or fuel channel deformation and vibrations due to safe shutdown earthquakes.

4C.3.3 Control Rod Material

A DESIGN

The external control rod materials must be capable of withstanding the reactor coolant environment for thealife of the control rod. tradiation offects, upon the material must be included in the control rod and core evaluations. Irradiation effects to be considered include material hardening and absorber depletion and swelling.

	6	OF	CRUDDI	NG.	CREV	ices, S	TRE	22
AC3.A	Reactivity	(CORROS	in	PWNO	IRAAD	(Profil)	0n3

The reactivity worth of the control rod is determined by the initial amount and type of absorber material and irradiation depletion. Scram time insertion performance and control rod drop times also effects must be included in the plant core aualyses including nuclear, abnormal operational occurrences, infrequent events, and accidents. galler

4C.4 REFERENCES

- - 1. GE Composi Rod Designs, (to be insued).

4C-1

5/5 8

(5) SEE ATTACHED



	GE Nuclear Energy
	ABWR
	Date 3-16-F2
JAY Lee 504-1080	Fax No.
MS 10D4	
us page(s)	
HA CAREWAY	Mail Code <u>759</u> 175 Curtner Avenue San Jose, CA 95125
(408) 925- <u>6008</u>	FAX (408) 925-1193 or (408) 925-1687
ABUR LOCA D	3.20
STILL OWS You E Hope fully today	
	JAY LEE 504-1080 M/S 10D4 US <u>9</u> page(S) <u>HA</u> CAREWAY (408) 925- 6008 <u>ABUR LOCA D</u> <u>STILL OWE YOU E</u> <u>Hope fully today</u>

How Dose and X/Q is Evaluated

Three separate file print outs are provided:

- 1. Dose_sum.prn
- 2. Iodinsum.prn
- 3. Nb/Jssum.prn
- 1.

"Dose sum.prn" provides a picture of the individual results for offsite calculations on page one. Page two shows the control room calculation for the control room calculations and page three shows the summary for offsite doses. Abbreviations are:

hy	Thyroid dose (rem)
VB	Whole body dose (rem)
1G	Noble gases
5L	Elemental and Particulate Iodines
DR	Organic Iodines
RESP	Organic lodines resuspended from MSIV leakage.

The results of the control room dose evaluation are passed onto the two other spreadsheets.

2.

"Iodinsum.prn" performs the iodine control room calculation. On page one, the control room activity and integrated activities are shown for both pathways (all species are summed). Then the control room activity is calmulated at the top of page 2 by using the following rules:

0.3 * Activity due to Reactor Building + 0.3 * Activity due to MSIV pathway

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0.7 * Larger of either (Reactor Building or MSIV) based upon the time integrated Activity.

The same thing is done under Dose evaluation to get the Total column.

Then the doses are reduced by a factor of four (Reduction factor).

Then I note that up to this time the control room doses are based upon a 0-8hr chiqu of 0.01 (Reactor Building) and the total dose is 73.9. So the next table changes the chiqu to 0.004 which brings the dose down to 29.5.

Finally the last table on the page is the activity table redone with the reduction factor and the new chiqu.

3.

"Nblgssum.prn" performs the same evaluation noble gases as "lodic.sum.prn" does for iodines.

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Summary	of Dose Re	esults					
Offsite 2hr	- Reactor Dist 300	Building Time 2	X/Q 1.18E-03		Thy 128	WB 2.28	
	800	2	2.19E-04		23.8	0.423	
30 day	Dist 3219	Time 0-8 8-24 1-4 4-30	X/Q 5.61E-05 2.22E-05 7.87E-06 1.7E-06		Thy 7.48 9.31 16.3 21.8	WB 0.114 0.12 0.129 0.134	
	4828	Ú-8 8-24 1-4 4-30	3.73E-05 1.21E-05 4.27E-06 9.09E-07		4.97 5.98 9.74 12.7	0.0761 0.0794 0.0842 0.0867	
++++++	******	*******	********	********	*******	*******	******
Offsite 2hr	- MSIV Lei Dist 300	akage Time 2	X/Q 1.18E-03	Species EL NG OR RESP Total	Thy 0.001562 0.1888 0.000424 0.190786	WB 6.02E-05 0.01221 0.000728 1.64E-06 0.013	
30 day	Dist 4828	Time 0-8	X/Q 3.73E-05	Species EL NG OR	Thy 0.03241 0.3927	WB 6.34E-05 0.01068 0.000768	
		8-24	1.21E-05	RESP EL NG OR	0.000706 0.09507 0 1.162	1.38E-06 0.000182 0.02334 0.002226	
		1 - 4	4.27E-06	RESP EL NG OR	0.00088 0.3896 0 5.816	7.51E-07 0.000362 0.06165 0.004964	
		4 - 30	9.09E-07	RESP EL NG OR RESP	0.052391 0.5132 0 13.71 3.168819	3.04E-05 0.00041 0.1041 0.007961 0.085678	
	Dist 4828	Time 0-8 8-24 1-4 4-30	X/Q 3.73E-05 1.21E-05 4.27E-06 9.09E-07	Totals	Thy 0.425816 1.25795 6.257991 17.39202	WB 0.011513 0.025749 0.067006 0.198149	

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Control Room - Reactor Building

	Time 0-8	X/Q 0.01	Species Iodine	40.42	WB 0.03183	Beta 0.04096
	8-24	0.0059	lodine	70.48	0.03746	0 0518
	1 - 4	0.00375	Iddine	165	0.04505	0.06633
	4-30	0.00165	Iodine NG	268.4	0.05031 33.97	0.07479 102.9
	Time 0-8 8-24 1-4 4-30	X/0 1.00E-02 5.90E-03 3.75E-03 1.65E-03	Totals	Thy 40.42 70.48 165 268.4	WB 3.90483 9.45746 23.27505 34.02031	Beta 8.37796 24.9218 68.35633 102.9748
++++++++++++++++++++++++++++++++++++++	++++++++	*******	******	+++++++++++++++++++++++++++++++++++++++	*****	******
CONCROI ROOM MS/Y	Time 0-8	X/Q 1.67E-03	Species EL NG	Thy 0.03462 0	WB 1.23E-05 0.05892	Beta 2.21E-05 0.1277
	8-24	9.83E-04	RESP EL NG	0.4194 0.000778 0.341 0	0.000149 2.75E-07 6.8E-05 0.3174	0.000245 4.55E-07 0.000128 0.9079
	1-4	6.25E-04	OR RESP EL NG	4.164 0.013142 1.572 0	0.000831 2.62E-06 0.000167 1.412	0.001567 4.95E-06 0.000317 4.344
	4-30	2.75E-04	OR RESP EL NG	23.5 0.773908 2.295	0.00233 7.67E-05 0.000204 3.142	0.004413 0.000145 0.000378 10.1
			RESP	69.24 18.76018	0.004639 0.001257	0.008114 0.002198
	Time 0-8 8-24 1-4 4-30	X/Q 0.00167 0.000983 0.000625 0.000275	Totals	Thy 0.454798 4.518142 25.84591 90.29518	WB 0.059081 0.318301 1.414574 3.1481	Beta 0.127968 0.9096 4.348876 10.11069

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2

2hr Site Boundary

Dist	max 300 800	X/0 2.76E-03 1.18E-03 2.19E-04	Thy 300 1.28E+02 2.38E+01	WB 5.37E+00 2.29E+00 4.26E-01	
30 day LPZ Di.t Time 4821 0-8 8-24 1-4 4-30		X/Q 3.73E-05 1.21E-05 4.27E-06 9.09E-07	Thy 5.395816 7.23795 15.99799 30.09202	WB 0.087613 0.105149 0.151206 0.284849	

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Workshee	et to evalu	uate Cont:	rol Room	Dose and	Inventory	
	Workspace D:\ABWR\ D:\ABWR\ D:\ABWR\ D:\ABWR\ D:\ABWR\	B SSAR\CHP1 SSAR\CHP1 SSAR\CHP1 SSAR\CHP1	5\LOCA\CI 5\LOCA\Di 5\LOCA\CI 5\LOCA\CI	NTRLRM\10D DSE_SUM.WQ NTRLRM\1CN HTRLRM\1_R	INSUM.W01 1 0 2 77 2 DSRCR.W01 B_CB.W01 0	0 2 77 24 24 Z 0 2 77 24 0 2 77 24
Reactor Time	Building 1	Control 2	Room Act	ivity B 24	96	720
Isotope 1-131 I-132 I-133 I-134 I-135	0.059939 0.06491 0.121674 0.062806 0.10691	0.020809 0.016698 0.041004 0.009926 0.033528	0.00715 0.0009 0.01178 3.04E-0 0.0062	1 0.011066 5 1.21E-05 9 0.011336 5 1.6E-10 6 0.001904	0.01198 5.57E-15 0.001443 0 1.36E-C6	0.000477 0 5.03E-13 0 0
Reactor Time	Building 1	Integrat 2	ed Contr	ol Room Ac 8 24	tivity 96	720
Isotope I-131 I-132 I-133 I-134 I-135	266.1666 330.7053 547.608 404.097 497.14 2045.717 2045.717	132.188 126.925 265.069 102.476 226.172 852.83 2898.547	154.577 67.214 282.79 22.9974 195.767 723.35 3621.90	6 465.283 10.1622 8 592.684 2 0.118184 1 82.276 5 1250.523 2 4872.425	2799.45 0.112376 1098.67 5.92E-07 54.331 3952.563 8824.989	4884.36 3.73E-11 74.3926 0 0.023257 4958.776 13783.76
MSIV Lea Time	akage 1	Control 2	Room Act	ivity B 24	96	720
Isotope I-131 1.9 I-132 2.08 I-133 3.89 I-134 2.0 I-135 3.4	1.92E-06 2.08E-06 3.89E-06 2.01E-06 3.42E-06	2.6E-05 2.09E-05 5.13E-05 1.24E-05 4.19E-05	0.00067 8.94E-0 0.00110 2.87E-0 0.00058	2 0.001741 5 1.93E-06 8 0.001784 5 3.46E-11 8 0.0003	0.00344 1.51E-15 0.000415 0 4.13E-07	0.000518 0.52E-12 3.78E-40
MSIV Leaka Time	akage 1	Integrat 2	ed Contr	ol Room Ac B 24	tivity 96	720
Isotope I-131 I-132 I-133 I-134 I-135	0.001087 0.001223 0.002215 0.00126 0.001964 0.007749 0.007749	0.040689 0.036049 0.080948 0.025488 0.067754 0.250929 0.258678	6.46597 1.66685 11.2853 0.24763 6.93221 26.5980 26.8567	4 63.10765 8 1.157434 9 79.01762 9 0.012076 7 23.23532 7 166.5301 5 193.3869	635.5321 0.018572 226.115 9.52E-08 9.681106 871.3463 1064.734	3048.114 1.03E-11 25.87513 0 0.007505 3073.997 4138.73

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Total

Time	1	control 1	ROOM ACL A	24	96	720
Isotope 	5.99E-02 6.49E-02 1.22E-01 6.28E-02 1.07E-01 4.16E-01	2.08E-02 1.67E-02 4.10E-02 9.93E-03 3.35E-02 1.22E-01	7.35E-03 9.77E-04 1.21E-02 3.12E-05 6.44E-03 2.69E-02	1.16E-02 1.27E-05 1.19E-02 1.70E-10 1.99E-03 2.55E-02	1.30E-02 6.03E-15 1.57E-03 0 1.49E-06 1.46E-02	6.33E-04 0 9.59E-13 0 1.13E-40 6.33E-04
Dose Eval	luation					
Time 0-8 8-24 1-4 4-30	RB 40.42 70.48 165 268.4	MSIV 0.454798 4.518142 25.84591 90.29518	Total 4.06E+01 7.18E+01 1.73E+02 2.95E+02			
Reduction	n Factor	4 Time 0-8 8-24 1-4 4-30	1.01E+01 1.80E+01 4.32E+01 7.39E+01			
Chiqu Fac	ctor	0.004 Time 0-8 8-24 1-4 4-30	4.06E+00 7.18E+00 1.73E+01 2.95E+01			
lodine Co Total Time	ontrol Rod 1	om Activi Control I 2	ty Room Acti 8	vity 24	96	720
Isotope I-131 I-132 J-133 I-134 I-135 Total	5.99E-03 6.49E-03 1.22E-02 6.28E-03 1.07E-02 4.16E-02	2.08E-03 1.67E-03 4.10E-03 9.93E-04 3.35E-03 1.22E-02	7.35E-04 9.77E-05 1.21E+03 3.12E-05 6.44E-04 2.69E-03	1.15E-03 1.27E-06 1.19E-03 1.70E-11 1.99E-04 2.55E-03	1.30E-03 6.03E-16 1.57E-04 0.00E+00 1.49E-07 1.46E-03	6.33E-05 0.00E+00 9.59E-14 0.00E+00 1.13E-41 6.33E-05

2

This is a combine worksheet to evaluate noble gus inventory and dose in the control room.

Spreadsheets. Workspace D:\ABWR\SSAR\CHP15\LOCA\CNTRLRM\NBLGSSUM.W01 0 2 77 24 Z D:\ABWR\SSAR\CHP15\LOCA\D0SE SUM.W01 0 2 77 24 Z D:\ABWR\SSAR\CHP15\LOCA\CNTRLRM\NGCNDRCR.W01 0 2 77 24 Z D:\ABWR\SSAR\CHP15\LOCA\CNTRLRM\NG_RB_CR.W01 0 2 77 24 Z

From Read	tor Build	ding				
Time	Control 1	Room Inter 2	grated Ac 8	tivity 24	96	720
KR85M KR85 KR85M KR87 KR88 KR89 XE131M XE133 XE133M XE135 XE135M XE137 XE138 XE138	4747.121 564.0642 11504.95 17756.22 29707.56 513.3517 295.5586 103094.2 4280.531 12803.27 5059.13 1754.086 19800.05	3391.89 566.21 9994.66 10842.8 23776.2 0.006977 296.03 102968 4246.7 11991 491.452 0.160728 1515.3	12222.68 8001.45 75552.8 23512.7 129748.5 1.4E-08 4141.727 1422356 56908.3 124523.2 40.99145 2.93E-06 92.59022	3002.08 44501.4 87586.7 2045.45 73997.7 0 22414.9 7435120 274030 308595 1.73E-05 0 7.38E-06	11.573 321496 10293.8 0.510595 2023.63 0 144898 41037400 1124200 177419 0 0 0	2.91F-11 1519420 0.112052 0 3.69E-05 0 338568 49597800 465391 618.355 0 0 0

From Rea	ctor Buil	ding				
Time	Control	Room Invei 2	ntory 8	24	96	720
Isotope						
KR85M KR85 KR85M KR87 KR88 KR88	1.20278 0.167853 3.20109 4.16311 7.9504	0.786897 0.159453 2.59648 2.28894 5.89372	0.331054 0.628698 3.96727 0.339255 5.2478	0.001468 1.08843 0.548249 9.31£-05 0.171822	4.55E-15 1.5502 8.96E-06 1.06E-21 4.31E-09	0.579431
XF131M XE133 XE133M XE135 XE135M XE135 XE137 XE138	0.087863 30.6079 1.26694 3.58986 0.409873 0.000498 1.3699	0.083266 28.9175 1.18824 3.24966 0.02751 8.73E-09 0.069461	0.323604 110.335 4.33884 8.13559 1.35F-33 1.35E-36 6.336 09	0.519112 175.004 6.1211 4.19495 9.01E-27 0	0.645864 168.087 3.47016 0.025657 0 0	0.053911 2.06669 0.000442 0 0

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1.15			10.1	
	1.2	80 C		
	_			

2

From MSI	V Leakage	Room Inter	reated bet			
Time	1	2	grated Act	24	96	720
KR85 KR85 KR85 KR87 KR88	0.181357 0.024154 0.469763 0.641859 1.17997	5.37911 0.963905 16.5179 16.6191 38.6261	227.4536 188.5193 1628.542 383.4696 2638.087	116.3359 2142.967 3903.502 75.43388 3039.946	0.675431 25961.06 628.6702 0.029546 120.036	2.84E-12 301406.8 0.011498 0 3.76E-06
KR89 XF131M XE133 XE133M XE135 XE135M	6.3E-05 0.012647 4.40746 0.182601 0.53597 0.084993	2.65E-06 0.503731 175.113 7.21233 20.127 0.489633	6.221-11 97.46362 33418.75 1332.084 2817.812 0.271828	0 1077.877 356892 13096.38 14166.31 5.86E-07	0 11619.59 3324755 87379.09 11732.17 0	0 61120.06 7981393 62658.63 65.3903 0
XE137 XE138 Total	0.296727 8.018183	6.59£-05 1.42842 282.9803	0.587421 42733.04	2.49E-07 394410.7	0 3462196	0 8406644
From MSI Control	V Leakage Room Inver	ntory 2	8	24	95	720
Isotope KR83M KR85 KR85M KR87 KR87	0.000309 4.31E-05 0.000821 0.001068	0 003121 0.000632 0.010298 0.009078 0.023375	0.010854 0.020579 0.129949 0.011131 0.171961	8.29E-05 0.061121 0.030864 5.28E-06 0.009687	4.6E-16 0.15333 8.94E-07 9.43E-23 4.32E-10	0.144784
KR89 XE131M XE133 XE133M XE135 XE135 XE135 XE137 XE138	6.65E-09 2.25E-05 0.007855 0.000325 0.000947 0.000115 1.28E-07 0.000352	2E-13 0.00033 0.114688 0.004713 0.012888 0.000109 3.46E-11 0.000275	0.010593 3.61167 0.142031 0.26639 4.47E-10 2.1E-10	0.030275 9.8282 0.3438 0.23585 0 0	0.063891 16.6303 0.343493 0.002549 0 0	0.013471 0.51642 0.000111 7.33F-24 0 0
Summary Control Time	Room Inve	ntory 2	8	24	96	720
Isotope KR33M KR85 KR85M KR87 KR88 KR88 KR88	1.20E+00 1.68E-01 3.20E+00 4.16E+00 7.95E+00	7.88E-01 1.60E-01 2.60E+00 2.29E+00 5.90E+00 5.90E+00	3.34E-01 6.35E-01 4.01E+00 3.43E-01 5.30E+00	1 49E-03 1.11E+00 5.58E-01 9.47E-05 1.75E-01	4.69E-15 1.60E+00 9.22E-06 1.08E-21 4.43E-09	6.23E-01 0 0 0
XE131M XE133 XE133M XE135 XE135M XE137	8.79E-02 3.06E+01 1.27E+00 3.69E+00 4.10E-01 4.98E-04	8.34E-02 2.90E+01 1.19E+00 3.25E+00 2.75E-02 8.74E-09	3.27E-01 1.11E+02 4.38E+00 8.22E+00 1.36E-08 1.35E-36	5.48E-01 1.78E+02 6.22E+00 4.27E+00 9.01E-27	6.65E-01 1.73E+02 3.57E+00 2.64E-02 0	5.80E-02 2.22E+00 4.75E-04 2.20E-24 0 0
XE138 Total	1.37E+00 5.41E+01	6.95E-02 4.53E+01	6.40E-09 1.35E+02	0 1.918+02	1.795+02	2.90E+00

Monday March 16, 1992 09:54 d:\abwr\ssar\chp15\loca\cntrlrm\nblgssum.prn Page: 2

Dose Evaluation

Summary

Time 0-8 8-24 1-4 4-30	Reactor Building WB Beta 3.90483 8.37796 9.45746 24.9218 23.27505 68.35633 34.02031 102.9748	MSIV 1.881 WB 0.059081 0.318301 1.414574 3.1481	(age Beta 0.127968 0.9096 4.348876 10.11069	Total WB 3.922554 9.55295 23.69942 34.96474	Beta 8.41635 25.19468 69.66099 106.008
	Credit for Intake	Vents	0-8 3-24 1-4 4-30	W8 0.980639 2.388238 5.924856 8.741185	Beta 2.104088 6.29867 17.41525 26.502
	Chigu Variation		0.004 0-8 8-24 1-4 4-30	WB 3.92E-01 9.55E-01 2.37E+00 3.50E+00	Beta 8.42E-01 2.52E+00 6.97E+00 1.06E+01

Control Time	Room Inver	ntory 2	8	2.4	96	720
Isotope KR83M KR85 KR85M KR87	1.20E-01 1.68E-02 3.20E-01 4.16E-01	7.88E-02 1.60E-02 2.60E-01 2.29E-01	3.34E-02 6.35E-02 4.01E-01 3.43E-02	1,49E-04 1.11E-01 5.53E-02 9.47E-06	4.69E-16 1.60E-01 9.22E-07 1.082-22	0.00E+00 6.23E-02 0.00E+00 0.00E+00
KR88 KR89 XE133 XE133 XE133 XE135	7.95E-01 2.59E-06 8.79E-03 3.06E+00 1.27E-01 3.69E-01	5.90E-01 5.04E-12 8.34E-03 2.90E+00 1.19E-01 3.25E-01	5.30E-01 0.00E+00 3.27E-02 1.11E+01 4.38E-01 8.22E-01	1.75E-02 0.00E+00 5.48E-02 1.78E+01 6.22E-01 4.27E-01	4.43E-10 0.00E+00 6.65E-02 1.73E+01 3.57E-01 2.64E-03	0.00E+00 5.80E-03 2.22E-01 4.75E-05 2.20E-25
XE135M XE137 XE138 Total	4.10E-02 4.98E-05 1.37E-01 5.41E+00	2.75E-03 8.74E-10 6.95E-03 4.53E+00	1.36E-09 1.35E-37 6.40E-10 1.35E+0/	9.01E-28 0.00E+00 0.00E+00 1.91E+01	0.00E+00 0.00E+00 0.00E+00 1.79E+01	0.00E+00 0.00E+00 0.00E+00 2.90E-01

3



GE Nuclear Energy

ABWR

Date 3-12-92

Fax No.

To

JAY Lee, phone 504-1080

This page plus _4_ page(s)

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Phone (408) 925- 6008

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Subject RAMSTELL N/Q EVALUATION

Message STILL GETTING STUFF together for other Two items. Will FAX LATTER

Evaluation of Ramsdell Chi/Q

1. To determine the Ramsdell χ /G for a given wind speed and stability, recource was made to a spreadsheet (see following page) which calculated χ /G from Ramsdell equation (9) from the 21st DOE/NRC Nuclear Air Cleaning Confrence Paper.

 $\chi/Q = 1 / (F_o + \pi \cup \Sigma_{wy} \Sigma_{wz})$

From the spread sheet it is shown that $F_{e} = 0$ for these calculations. Therefore only Σ_{wy} and Σ_{w_2} needed to be calculated for each combination of speed and stability.

2. To calculate these sigma values, standard σ_y and σ_z need to be calculated. Recourse was made to the Pavan code subroutine POLYIN (see sheet 2) from which the coding was pulled and a table created in the spreadsheet so that for a given wind speed, the standard σ_y and σ_z were calculated for stabilities 1 through 7. Then the spreadsheet software picked the proper σ_y and σ_z from the table coresponding to the stability given in the "Basic Input Parameters".

3. Following the calcuation of σ_y and σ_z , σ_{yw} and σ_{zw} need to be calculate from Ramsdell equations (7) and (8) which are done under the headings of "ssgma_yw" and "ssgma_zw". Factor 1 is the evaluation of the exponential term in the two equations. We note that the equations in the report are in error and the factor 0.0869 in the exponentials should be negative (telcon Ramsdell). Factor 2 is the evaluation for the terms in brackets in the equations. Finally factor 3 is the solution of the equations number (7) and (8). We also note the the first square root of area term found in each equation is also in error and should be the area to the first power (telcon Ramsdell).

4. Σ_{wy} and Σ_{wz} are then evaluated from equations (5) and (6) and shown in the spreadsheet as terms "SSigma wy" and "SSigma wy" at the bottom of the page.

5. Finally, χ/Ω is evaluated as Chiqu = at the top of the spreadsheet for the basic input parameters.

 Since spreadsheets have the capability of evaluating to tables, tables of wind speed versus stability were made for distances of 41 and 108 meters as is show on the third page. This Spread sheet calculates the X/Q value for a given distance and stability using the technique given by Ramadell in could of the 21st L/OE/NRC Nuclear Air Cleaning Conference.

Basic input parameters

Distanc	108	meters
Stability	- 1.1	
Wind Spd	0.5	mutar/second
Bigd Area	2000	sq meter
Release Flow	0	bubic meter/second

Chiqu = 6.05E-05

Calculation o/ Standard Sigma Y and Sigma Z from PAVAN subroutine 'POLYN'

Statinty		AY	Sigma Y		
	1	0.3658	25.10		
	2	0.2751	18.87		
	3	0 2089	14.33		
	4	0.1471	10.09		
	5	0.1046	7.18		
	6	0.0722	4.95		
	7	PV &	0.53		
		AZ	82	CZ	Sigma Z
	. 1	88000.0	1.941	9.27	15.11
	2	0.0382	1.149	3.3	11.59
	3	0.113	0.911	0	8.05
	4	0 222	0.725	-1.7	4.92
	5	0.211	0.678	-1.3	3.75
	6	0.086	0.74	-0.35	2.40
	7	n/n	nia.	0/8	0.19

Calculation for 3uper Sigmas (SSigma) based upon Ramadell's formulations in equations 5, 6, 7 and 8

Compensation Stability Facto	n factor, k≂ r, S≔		0.5	only characterized by Ramsdell Sort of Stability, ref talcon with Ramsdell
aagma_yw	1 0.810594	2 0.019169	3 10089.02	
ssgma_cw	1 0.810698	2 0.019169	0 10089.02	
SSigma_wy SSigma_wy		103.53 101.57		

58147 01 04-11 66 67.937

LABE: POLVK PAGE -----

Car DC 1.24.1 0 7 1-15-11 (4) SUBROUTINE POLYNCIC, AVAL, RESULT, LDSRT) DIMENSION AV(57, AZ16, 31, 6276, 31, 615121 DIMENSION SZ(7, 31, 4K(111), K(7) DIMENSION SZ(7, 31, 4K(111), K(7) DATA SZ'1, 114, 1, 322, (.653, 2.0, 2, 431, 2, 889, 3, 358, 0, 982, 1, 230, 1, 519, 2, 462, 2, 903/ DATA AK, EX, K/, 144, 443, 79, 1, 30, 1, 130, 1, 393, 1, 708, 2, 079, 2, 2, 462, 2, 903/ DATA AK, EX, K/, 144, 443, 79, 1, 30, 1, 130, 1, 393, 1, 708, 2, 079, 2, 2, 462, 2, 903/ DATA AK, EX, K/, 144, 443, 79, 1, 30, 130, 1, 394, 279, 294, 303 DATA AK, 558, 2, 503/ DATA AY, 3658, 517, 314, 11, 921, 301, 891, 731, 865, 916, 917, 2, 2, 2, 2, 2, 2, 113, 1, 26, 6, 73, 18, 05/ DATA AY, 3658, 132, 2, 603, 313, 1, 26, 6, 73, 18, 05/ DATA AZ/ 152, 156, 113, 1, 26, 6, 73, 18, 05/ DATA AZ/ 152, 156, 113, 1, 26, 6, 73, 18, 05/ DATA BZ/ 956, 922, 505, 981, 871, 814, 1, 941, 1, 143, 911, 725 X, 211, 066, 0, 922, 505, 981, 871, 814, 1, 941, 1, 143, 911, 725 X, 74, 2, 093, 511, 516, 305, 113, 1, 36, 6, 73, 18, 05/ DATA 62/6*0, 9, 27, 3, 3, 0, 17, 1, 3, -35, -9, 6, 2, ...,13, .344, 4 25 6 RESULT=AZILC_L)*AVAL**BZ*1' 1+CZILC_L) 1" (RESULT. CT. 1000) RESULT-1000 F-AZ(6,L)*AVAL**BZ(6,L)*CZ(6,L) E-AZ(5,L)*AVAL**BZ(5,L)*CZ(5,L) RE3ULT-Z,*AL0910(F)-AL00(8(E) RESULT=2. *ALDG10(F)-ALDG10(E) RESULT-RESULT+S2(J.IC)*XN/KD 19 我在忽然近下午有张公司主白米成分为让米米区风(23) ê 60 15 10 0 00 2 L=1,2 [FfAVAL(LT.DIS(L)) 60 2.0001100E RESURTERY (1) * AVAL ** BY IF(10.EQ.14) 60 10 25 FF12, EQ. 71 G0 T0 30 DESERT TYPE SIGMA'S 80+1. 90 4 K=1,7 1F(K.E0.J) 30 10 4 500 RESULT-10, **RESULT 999 1*(RESULT.CT 1000 X21=XN=(AVLG-X(K)) AVLG=ALCG10(A7AL) XD=XD=(X(J)=X(K)) F=点子毛岛1米点VAL~#BY E-AY(5)*AVAL**BY IF(HC.LE, 3) 00 1 3=1,7 666 01 06 002 01 00 07 10 999 666 01 00 60 10 500 RESULT=0 CC. LINUE E-31=11 トーロールズ periltrad X X A I Mar. 15 n ... RA 1001 ģ 10 08 Cataa 641 20 10 100 200 0 - 2 229 0.04200-00-00400 61 333 33 23 30 20 52 1.63 02 51 3 244 000013 000013 000013 214 5160 £100 6100 211 サイト 52 36 0.3 076 90 17 300 50 63 211 1102 1 00013 19 N

Comparison Of Ramsdell

Chiqu's evaluated at 41 meters

	1.1	2	3	4	5	6	
0.	5 3.84E-04	3.96E-04	4.04E-04	4.108-04	4.14E-04	4.17E-0A	4.20E-04
	1 6.79E-04	7.34E-04	7.73E-04	8.032-04	8.18E-04	8.29E-04	8.39E-04
	2 9.40E-04	1.15E-03	1.338-03	1.498-03	1.57E-03	1.628-03	1.68E-03
	4 8.63E-04	1.248-03	1.73L-03	2.32E-03	2.70E-03	3.012-03	3.35E-03
	6 6.87E-04	1.07E-03	1.658-03	2.58E-03	3.31E-03	4.02E-03	5.03E-03
	8 5.53E-04	8.96E-04	1.496-03	2.53E-03	3.54E-03	4.688-03	6.69E-03
1	0 4.58E-04	7.57E-04	1.318-03	2.40E-03	3.548.03	5.04E-03	8.358-03

Chiqu's evaluated at 108 meters 6 0.5 6.05E-05 6.34E-05 6.54E-05 6.71E-05 6.84E-05 6.95E-05 7.05E-05 1 1.08E-04 1.18E-04 1.26E-04 1.32E-04 1.35E-04 1.38E-04 1.41E-04 2 1.53E-04 1.98E-04 2.18E-04 2.45E-04 2.61E-04 2.72E-04 2.82E-04 4 1.44E-04 2.09E-04 2.90E-04 3.88E-04 4.53E-04 5.07E-04 5.64E-04 6 1.16E-04 1.81E-04 2.82E-04 4.38E-04 5.62E-04 6.95E-04 8.44E-04 8 9.40E-05 1.53E-04 2.54E-04 4.37E-04 6.06E-04 8.06E-04 1.12E-03 10 7.81E+05 1.30E-04 2.24E-04 4.16E-04 6.11E-04 8.77E-04 1.40E-03 4

0.5124680	Ratio 41, 1 6.24E+00 6.28F+00 6.14E+00 5.98E+00 5.92E+00 5.92E+00 5.92E+00	108 6.24E+00 6.21E+00 6.11E+00 5.97E+00 5.90E+00 5.90E+00 5.86E+00	3 6.17E+00 6.15E+00 6.09E-00 5.97E+00 5.89E+00 5.85E+00 5.85E+00	4 6.10E+00 6.09E+00 6.06E+00 5.96E+00 5.88E+00 5.88E+00 5.88E+00 5.88E+00 5.88E+00	5.05E+00 6.04E+00 6.02E+00 5.96E+00 5.89E+00 5.89E+00 5.83E+00 5.83E+00 5.73E+00	6.005+00 5.995+00 5.985+00 5.935+00 5.875+00 5.875+00 5.815+00	7 5.95E+00 5.95E+00 5.95E+00 5.95E+00 5.95E+00 5.95E+00 5.95E+00
10	5.87E+00	5.84E+00	5.83E+00	5.78E+00	5.79E+00	5.745+00	5.968+00

5.974614

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1



GE Nuclear Energy

ABWR

Date 3-12-92

Fax No.

Rober Pedersen phone 504-3162

This page plus _____ page(s)

To

From HA CAREWAY

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Message	-DAC to follow LATTER TOdAY.
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CHAPTER 12.4

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12.4.4 Turbine Building Dose		12.4-2.2
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12.4-1 Projected Annual Radiation Exposure for ABWR 12.4-3

12.4 DOSE ASSESSMENT

Dose assessment is an important part of determining and projecting that the plant design and proposed methods of operation assures that occupational radiation exposure will be as low as reasonably achievable. Dose assessment depends upoa estimates of occupancy, dose rates in various occupied areas, number of personnel involved in reactor operations and surveillance, routine maintenance, waste processing, refueling, in-service inspection, and special maintenance.

The goal is to reduce the exposure associated with each phase of plant operation and maintenance to the minimum level consistent with practical considerations for accomplishing each task. To achieve this goal, the ABWR design includes numerous significant design improvements to reduce occupational exposures from past experience. The design improvements include the elimination of recirculation piping and valves, improved wate: chemistry and low cobalt alloys at the cooling water boundary, reduced equipment maintenance and improved access, RHR discharge to the feedwater piping, overhaul handling and refueling devices, multiple main steam line plugs, automatic MSiV seat lapping system and reactor vessel stud tensioner. In assessing the collective occupational dose, each potentially significant dose-causing activity was evaluated. Values referred to as typical BWR operations are taken from references 1 through 4 which are a compendium of maintenance and work tasks for BWR-6, GESSAR.

12.4.1 Drywell Dose

The following provides the basis by which the drywell dose estimates for occupational exposure were made.

(1) The main steam isolation valves are located in the upper drywell area (4 valves) and in the reactor building outboard of the primary containment isolation wall (4 valves). These valves require periodic testing and maintenance to insure proper action and leak tightness. Typical values for BWR's for maintenance of these valves is 4,000 hours of drywell and 5,000 hours of reactor building work in effective radiation fields of 13.5 mRem/hr and 3.6 mRem/hr respectively. The ABWR design incorporates three specific features to reduce occupational exposure in the MSIV 23A5100AL Rev. B

maintenance area: (1) improved water chemistry with lower overall contamination rates, (2) improved maintenance procedures with some procedures automated, and (3) reduced radiation fields, primarily due to the absence of the recirculation piping. Each area is discussed below.

Beginning in the early 1980's the BWR Owner's Group began an extensive study of the causes for failure of MSIV's to meet the technical leakage specification limits and extensive person-hours required to maintain these valves. As a result of these studies, the ABWR will use the latest technology for valve maintenance including mechanical aids for valve disassembly and assembly, automated lapping devices, and slightly relaxed leakage specifications to delete unnecessary maintenance. As a result of these aids, it is estimated that overall maintenance hours will be reduced by 50-60 percent.

Early studies on dose rates during MSIV maintenance showed increases in dose rate directly proportional to recirculation line activity. The ABWR has deleted the recirculation lines entirely thereby removing the ringly most significant source of radiation in the drywell. The second most significant dose for MSIV operations will be the deposited and suspended activity in the feedwater lines. The deposited activity in the feedwater lines is expected to be lower than typical BWRs owing to an enhanced coudensate system with full clean up of all condensate water, a 2% reactor water clean up system, and titanium condenser tubes. Additionally, the ABWR is designed to limit the use of cobalt bearing materials on moving components which have historically been identified as major sources of in water contamination. Overall, the feedwater line radiation is expected to be a factor of three lower than current BWRs. Because of these factors, it is expected that the effective dose rate in the drywell will be 1.8mRem/hr and 1.3mRem/hr in the steam tunnel outboard of the primary containment.

2) Drywell valve and pump maintenance other than the MSIVs consists primarily of maintaining the safety relief valves (SRVs) which for the most part consist of minor maintenance or removal of valves to a maintenance facility. Overall typical values for a BWR for these tasks are 1,450 person-hours per year in an effective radiation field of

17mRem/hr. In the ABWR, the primary source of radiation exposure, the recirculation lines and pumps, have been removed. Overall the reduction in drywell dose level is for these types of maintenance is expected to be a factor of two or 9mRem/hr. Overhead tracks and in place removal equipment is provided in the ABWR for an estimated person reower reduction to 1,150 person-hour per year brokea down into 200 person-hours for 18 SRV maintenance at 6mRem/hr, 200 person-hours per year to pull and replace 3 RIPs with one heat exchanger at 20mRem/hr, and the remainder on miscellaneous valves at 4.5mRem/hr.

- (3) Control rod drive maintenance is significantly reduced in the ABWR with the introduction of fine motion control rod drives (FMCRD). Based upon European experience, two FMCRDs will be replaced and repaired per outage along with twenty motors. Estimated work will consist of 64 person-hours under vessel preparation, 40 person-hours FMCRD removal and reinstallation, 200 person hours motor removal and installation, and 64 person-hours cleanup. Typical under vessel effective dose rates are 17mRem/hr but because of the removal of the recirculation pumps and lines (has) been reduced to 6.5aiRem/hr. Have note have
- (4) The LPRM/TIF system assumes the servicing of two sensors per year and is based upon a total of 200 person-hours per year at an effective dose rate of 50mRem/hr which is typical for BWR operations.
- (5) Inservice inspection consists of primarily NDE examination of vessel and piping systems and welds. Typical BWR values are 2400 person-hours per year at 12mRem/hr effective exposure rate. ABWR inservice inspection is estimated based upon the following:

Elimination of recirculation lines and pumps with the following savings:

Elimination of 14 nozzle inspections at 2 per year, saving 360 person hours

Elimination of shield penetration and shield plug removal saving 240 person hours per year 23A610-IAL Rev. D

Reduction on weld inspection on recirculation lines estimated at 240 person hour per year

Elemenation ab

Reduction in drywell dose by 50% with the provision that the feedwater line dose is more than half the recirculation line dose and general drywell dose level and therefore removal of recirculation line inspection is estimated to be weighted at twice the general drywell dose rate

Overall it is estimated that by use of automated turtles for inspection person-hour expended in ISI will be reduced by a factor of two.

The ABWR uses a forged ring pressure vessel in comparison to older plate welded vessels reducing the total vessel weld length inspection by 30% and the total weld inspection by 10%.

The ABWR design incorporates specific access into inspection areas past insulation areas with an estimated savings of 120 person-hours.

Overall person-hours reduction is 1,200 person-hours at approximately half the typical effective dose rate or 5.5mRem/hr.

(6) Other drywell work includes items such as minor valve maintenance, instrumentation work, and all other drywell work. Typical BWR work in this area estimates 5,500 person-hours per year at 17 mRem/hr. Overall reduction in this effort due to ABWR design improvements are:

Significant savings in total hours are estimated due to removal of the recirculation lines with miscellaneous recirculation line work such as line snubbers, fewer drywell cooling units, and loss assembly/disassembly work on insulation due to the use of automated units. Overall it is estimated that 2,000 person hours savings can be made.

Overall reduction in the drywell radiation due to removal of the recirculation system results in the reduction of the overall upper drywell dose rate to 1.8mRem/hr and the lower drywell dose rate to 5.0mRem/hr since the components involved such as drywell coolers typically do not carry radioactive inventory. Assuming that of the remaining 3,500 person-hour, 2,000 is upper drywell work and 1,500 is lower drywell work at their respective effective dose rates. J-Alex

12.4.2 Reactor Building Dose

The following provides the basis by which the reactor building dove estimates for occupational exposure were mede

- (1) Vessel access and reassembly typically requires 4500 person-bours of work at an effective dose rate of 3 mr/hr. The ABWR work will involve the use of a stud tensioner for a 96 bolt top head. The projected time to remove 96 bolts with this equipment is between 600 to 1200 person-hours. Due to the larger ABWR vessel and expected reduced water contamination with the improved clean up system, the estimated projected effective dose rate is 1.5 mRem/hr.
- (2) ABWR refuelling is accomplished via an automated refuelling bridge. All operations for refuelling are accomplished from an enclosed automation center off the refuelling floor. Time for refuelling is reduced from a typical 4,400 person-hours down to 2,000 person and from an effective dose rate of 2.5 mRem/hr to less than 0.2mRem/hr.
- (3) RHR/CUW maintenance work consists of inspections for two pumps per year in each system. In the RHR system this consumes 150 person-hours per year at an effective dose rate of 40m Rem/hr. In the CUW system this typically uses 1400 person-hours per year at an effective dose rate of 14mRem/hr. ABWR wi'l use canned pumps for both system with an estimated reduction in maintenance to 100 person-hours per pump. With improved water chemistry and overall reductions in reactor water concentrations due to the two percent cleanup system the effective dose rate is estimated at twenty percent of the typical value for these system.
- (4) FMCRD rebuilding estimates are taken from similar work done in Europe since no significant U.S. data exists to date. Two drives will be rebuilt at an effective dose rate of 4.5 mRem/hr and 30-60 hours per drive.
- (5) Instrumentation work typically requires 1,000 person-hours of work per year at an effective dose rate of 5.0 mRem/hr. ABWR should take about the same effort in instrumentation, however because of the increased emphasis and

Amendment 20

improved water chemistry systems, should reduce the effective dose rate to two-thirds the typical value or 3.0mRem/hr.

All other work in the reactor building typically takes 7,400 person-hours per year at an effective dose rate of 2.8mRem/hr. This work includes all valve work. RIP rebuild work, minor maintenance, and CRD hydraulic line work. The major task in this area is the hydraulic control units which require 5,000 person-hours per year at an effective dose rate of 3.3mRem/hr. With the use of the FMCRD units, an additional savings of 2,000 person-hours is anticipated. In addition, the ABWR reactor building has been designed to provide for ease of maintenance with overhead lifts, coordinated hatch ways and ample space to maintain in place equipment. In addition, with the exception of one tank and the pressure vessel, all the equipment in the reactor building is removable with those pieces which can be expected to be moved being palatalized. Because of these factors, an overall reduction in work of 1,000 person-hours is estimated. Because of the improved water chemistry the overall effective dose rate is anticipated at one half the typical **BWR** dose rate.

12.4.3 Radwaste Building Dose

Radwaste building work consists of pump and valve maintenance, shipment handling, radwaste management, and general clean up activay. Typically, 6,700 hours are expended per year at an effective dose rate of 5.5mRem/hr. The ABWR radwaste building is designed along the same lines as newer radwaste facilities overseas. The building incorporates enhanced remote control and shielding for handling of resin materials which is expected to reduce overall maintenance by 1500 to 2000 hour per year at significantly reduced dose levels. In addition, radwaste pumps for ABWR are expected to utilize air driven. rack mounted pumps. Such pumps which are designed to handle slurries have been proven to show much longer life times between maintenance and being basically a very small portable pump, can be readily replaced. Replaced pumps are then subject to intense chemical decontamination prior to maintenance and repair. Overseas utilities have reported occupational exposures typically less than 1 person-rem per year using this design. For ABWR assuming 2,000 hours reduction in maintenance due to remote handling and an additional 500 hours reduction for pump replacement, 4,200 hours per year are estimated with

Sura B

reduced effective dose rates of 2.5mRem/hr owing primarily to remotting those jobs involving high radiation exposure.

12.4.4 Tu, oine Ruilding Dase

- (1) Typical BWR valve maintenance in the turbit a building uses 1,150 hours per year at an effective dose rate of 9.5mRem/ht. The valve maintenance requirements for ABWR do not vary significantly over current plants, therefore the total hours for this type of work is assumed as approximately the same excepting minor adjustments for improved valves, maintenance jigs, and automated devices will lower the estimated maintenance time to 1,000 hours. The effective dosy rate of 9.5 mRem/hr is estimated at more than one half this value due 10 to basically improvements in BWR fuel over the generation of fuel from which this data was taken bringing the effective dose rate down to 3.9mRem/hr. (la addition, beta shielding is) recommended for work on valving where 10 possible which it is estimated will reduce the overall effective dose rate by an additional 10% 10 3.5mRem/hr.
- (2) In a similar fashion the turbine maintenance work typically requires 18,500 hours of work at an effective dose rate of 0.3mRem/hr. With additional operational improvements in automating turbine maintenance, overall work is estimated to be reduced to 15,500 hours. The effective dose rate for the turbine is not expected to be as sensitive to fuel performance as will the turbines but is estimated to reflect a decrease in dose to 0.2mRem/hr for turbine overhaul work.
- (3) Work ou the turbine hall condensate system typically requires 2,000 hours per year at an effective dose rate of 7.5mrem/hr. The condensate system in ABWR uses hollow-fiber filled filters which require half the maintenance of a typical system. In addition, with the plant incorporating Fe control in the feedwater system and a significant reduction in cobalt bearing materials, the overall effective dose rate is estimated at half the above value.
- (4) Other work in the turbine building typically takes 13,140 hours per year at an effective dose rate of 0.1mRem/hr. Only minor changes can be assumed with ABWR with some remote operations and slight reductions in operating

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exposures. For the ABWR it is estimated that a 10% reduction can be realized with improving technology with no significant change in dose rate.

12.4.5 Work at Power

Work at power typically requires 5,000 hours per year at an effective dose rate of 6.6r. Rem/hr for the BWR. This category covers literally all aspects of plant maintenance performed during normal operations from health physics coverage to surveillance, to minor equipment adjustment, and minor equipment repair. Overall the ABWR has been designed with more automated and remotted equipment. It is experted that items of routine monitoring will be perio, acd by camera or additional instrumentation. Most equipm of in ABWR is palatalized which permits quick and easy replacement and removal for decontamination and repoir. Therefore a reduction in actual hours need at power is estimate at 1,000 hours less than the typical value. In the area of effective dose rate, the ABWR is expected to have significantly lower general radiation levels over current plants owing to more stringent water chemistry controls, a full flow condensate flow system, a 2% clean up water program, fitanium condenser tubes, Fe feedwater control, and low cobalt usage. In addition, the ABWR is the most compartmentalized BWR design which (1) permits better shielding in specific work areas, and (2) lowers colla oral radiation contamination. Overall then it is estimated that the effective dose rate for work at power will be slightly over two thirds the typical rate or 4.0mRem/hr.

12.4.6 References

- Knecht, P.D., BWR/6 Drywell and Containment Maintenance and Testing Access Time Estimates, GE Report NEDE-23819, May 1978.
- Knecht, P.D., Maintenance Access Time Estimates, BWR/6 Radwaste Building, GE Report NEDE-23996-2, May 1979.
- Knecht, P.D., Maintenance Access Time Estimates, BWR/6 Auxiliary and Fuel Buildings, GE Report NEDE-23996-1, May 1979.
- Study of Advanced BWR Features, Plant Definition/Feasibility Results, Volume III, Appendix Part G, GE NEDE-24679, Oct 1979.

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Table 12.4-1

PROJECTED ANNUAL RADIATION EXPOSURE

Operation	SSAR	Hours	i ni indi	Person
Lask	Section	per year	mRem/hr	Fem/yr
Dryweli				
MŠIV	12.4.1(1)	4,200	1.5	6.3
SRV,RIP,etc	12.4.1(2)	1.150	7.5	8.6
FMCRD	12.4.1(3)	\$10	6.5	2.4
LPRM/TIP	12.4.1(4)	200	50.0	10.0
ISI	12.4.1(5)	1,200	5.5	6.6
Other	12.4.1(6)	3.500	3.5	12.3
Total		10,620		46.2
Reactor Building				
Vessel	12.4.2(1)	1,200	1.5	1.8
Refueling	12.4.2(2)	2,000	0.2	0.4
RIIR/CUW	12.4.2(3)	4(x)	8.0	3.2
FMCRD	12.4.2(4)	120	4.5	0.5
Instrument	12.4.2(5)	1,000	3.0	3.0
Other	12.4.2(6)	4,400	1.5	6.6
Total		9,120		15.5
Radwaste Building	12.4.3	4,200	2.5	10,5
Turbine Building				
Valve Maint	12.4.4(1)	1.000	3.5	3.5
Turbine Ovrhl	12.4.4(2)	15,500	0.2	3.1
Condensate	12,4,4(3)	1,000	3.5	3.5
Other	12.4.4(4)	11,800	0.1	1.2
Total		29,300		11.3
Work at Power	12.4.5	4,000	4.0	16.0
Totals		48,120		99.5



GE Nuclear Energy

ABWR

Dale 3-16-92

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To

ROGER PEdersen 504-3162 NS1004

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From HA CAREWAY

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Subject Revised JAC

Message Revised Dic per Telcon

Table 3.2a: PLANT SHIELDING DESIGN

Certified Design Commitment

 The plant design shall provide radiation shielding for rooms, corridors and operating areas commensurate with their occupancy requirements to maintain radiation exposures to plant personnel as low as reasonably achievable. Inspections, Tests, Analyses

- An analysis of the expected redistion levels in each plant arec will be cerformed to verify the adequecy of the shielding design. This enalysis shell consider the following:
 - a. Confirmetory calculations shall consider all significant radiation sources (greater than SI contribution) for an area. Radiation source strength in plant systems and components will be determined based upon an assumed source term of 100,000 (Curie/second offgas release rate (after 30 minutes decay), a 200 (Curie/gram steam N-16 source term at the vessal exit nozzle, and e core inventory commensurate with a 4005 MWT equilibrium core at 51.6 kwatt/liter. All source terms shell be edjusted for radiological decay and buildup of activated corrosion and wear products.
 - b. Commonly accepted shielding codes, using nuclear properties derived from well known references (such as Vitamin C and ANSI/ANS-6.4) shall be used to model and evaluate plant rediction environments.
 - For non-complex geometries, point kernal shielding codes (such as QAD or GGG) shall be used.
 - For complex geometries, more sophisticated two or three dimensional transport codes (such as DORT or TORT) shall be used.
 - c. In any calculation, a safety factor shall be applied based upon benchmark comparisons of the code and data collected from known and measured environments.

Acceptance Criteria

 Maximum expected rediation levels are well within (25% or lass) of the radiation zone designation, for each plant area, as indicated in Figures

Certified Design Commitment

- The plant design shall provide shielded cubicles, labyrinth access, and space for temporary shielding to allow for maintenance of plant components without significant redistion exposure from adjacent plant systems or equipment.
- The plant radiation shielding design shall permit operators to perform required safety functions in vi-al areas of the plant (including access and egrees of these areas) under accident conditions.

Inspections, Tests, Analyses

- Using the methods identified in (1) above, radiation levels present in areas where meintenance is performed shall be evaluated for the contribution from adjacent high radiation areas and equipment.
- 3. An analysis of the expected high rediation levels in such area which will or may require occupancy to permit an operator to aid in the mitigation of or recovery from an accident (vitel area) shell be performed to varify the adequacy of the plant shielding design. This analysis chall use calculational methods consistent with (I.b) above and a radiation source term (adjusted for redioactive datay) based on the following:
 - a. Liquid containing systems: 180% of the core equilibrium noble gas inventory, S2% of the core equilibrium halogen investory and 1% of all others are assumed to be mixed in the reactor coolent and recirculation liquids recirculated by the residuel heat removal system (RHR), the high pressure core flooder (HPCF), and the reactor core isolation cooling (RCIC) systems.
 - b. Ges containing systems: 100% of the core equilibrium noble ges inventory and 25% of the core equilibrium halogen activity are assumed to be mixed in the containment etmorphere. For vepor containing systems (such as the mein steam lines) these core inventory fractions are assumed to be contained in the reactor coolant sepor space.

Acceptance Criteria

- Shielding design is such that radiation from adjacent areas shall contribute no more than a small fraction (10% or less) of the radiation field intensity or less than 0.06mrem/hr whichever is larger, in plant areas where maintenance is performed.
- 5. Under accident conditions, rediction chielding design slipes access, occupancy and agress of vital areas such that personnel rediction exposures do not exceed 5 rem to the whole body, or its equivalent, for the duration of the accident (based on the required frequency of access to each vital area). For areas requiring continuous occupancy (such as the control rows), local rediction hot spots shall not exceed 15 mrem/br (sveraged over 30 deys).

Certified Design Commitment

 The plant design shall provide radiation snielding to maintain radiation exposure to the general public as low as is reasonably achievable. Inspections, Tests, Analyses

 Using the methods identified in (1) above, the rediction dose to the maximally exposed member of the general public from direct and scattered shall be determined. Acceptance Criteria

4. The rediation dose to the maximally exposed member of the public when combined with dose committeents from the nuclear fusi cycle (including liquid and geneous pathways) shall be within 25 r — whole body dose or Pherem to any o' organ.

Table 3.2b: VENTLATION AND AIRBORNE MUNITORING

Certified Design Commitment

Piant design shall provide adequate containment of airborne radioactive meterials and the ventilation system will ensure that concentrations of airborna rsdionuclides are maintained at fevelv consistent with personnal access requirements.

-

Inspections, Tests, Analyses

- Expected concentrations of airborne radioactive metarial shall be calculated by rucclide for normed plant operations.
 solicipated operational occurrances for each equipment cubicle, corridor, and operating area requiring personnel access. Calculations shall consider:
- Design ventilation flow rates for each area.
- b. Typical isakage characteristics for equipment located in each area, and
- b. A redistion source term in each fluid system shell be determined based upon en essumed offges rate of 100,030 Curis/second (30 minute decay) appropristicly edjusted for rediological decay and buildup of activated corresion and each products.

Acceptance Criteria

- Calculation of radioactive minimum concentracion shell demonstrate that:
- a. For normelly occupied rooms and areas of the plant (i.e. those areas requiring routine access to operate and meintain the plant) equilibrium concentrations of airborne nuclides will be a smult freetion (NCL or less) of the occupational concentration limits listed in 10 CFR 20 Appendix 8.
- b. For rooms that require infrequent access (such as for non-rootine equipment meintenance), the ventilation system shall be capable of reducing redisective airborne concentrations to (and meintaining them at) the occepational concentration limits Listed in 1005R20 Appendix 8 during the periods that occepancy is required.
- For rooms that seldom require access (such as tenk rooms), plant design shall provide sufficiant containment and vantilation to ansure sirberna contamination does not spread to other areas.

ú

Certified Design Commitment

2. Airborne radioactivity monitoring shall be 2. An analysis shall be periormed to identify the provided for those normally occupied areas of the plant in which there exists as significant potential for airborne contamination (greater than 0.1 per year)

Inspections, Tests, Analyses

plant areas that require airborne radioactivity monitoring.

Acceptance Criteria

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- 2. Airborne redicectivity monitoring system shell:
 - a. Have the capability of detecting concentrations equivalent to the occupational concentrat in limits of 10CFP20 Appendix B, for the most restrictive particulate and/or indine redionuclide in the eree, within 10 hours.
 - b. Provide a calibrated resconse, representativs of the concentrations within the area (i.E. air sampling monitors in ventilation exhaust streams shall collect and isskinatic sample).
 - c. Provide tocal audible alarms (visual elerms in high cuise erees) with variable wh set points, and readout/an __cistion capability in the control room.



GE Nuclear Energy

ABWR				
Date 3-19-52				
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To

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From HA CAREWAY

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Subject	Reused	TAC	\$	See	12.4	
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Table 3.2a: PLANT SHIELDING DESIGN

Certified Design Commitment

 The plant design shall provide radiation shielding for rooms, corridors and operating areas commensurate with their occupancy requirements to maintain rad ation exposures to plant personnel as low as reasonably achievable. 1. An emalyzis of the expected rediction levels

Inspections, Tests, Analyses

in each plant arns will be performed to verify the acequacy of the shielding design. This analysis shall consider the following:

- Confirmatory calculations shall consider all confirmatory calculations sources (greater than '4 contribution) for an area.
 Radiation source strength in piant systems and components will be determined based upon an assumed source tarm of 100,000 [Curie/second offgas release rela (after 30 minutes decay), a 200 [Curie/gremisteen N=16 source tarm at the vessel exit nozzle, and a core inventory commensure's with a 4005 MMT equilibrium core at 51.6 kwatt/liter. All source terms tiell be adjusted for rediological decay and buildup of activated corrosion and wear products.
- b. Commonly accepted shialding codes, using nuclear properties derived from vell known references (such as Vitamin C and AMS1/ANS-6.4) shall be used to model and avaluate plant radiation environments.
 - For non-complex geometries, point kernel shoulding codes (such as GAD or GGG) shall be used.
 - For complex geometries, more sophisticated two or three dimensional transport codes (such as FORT or TORT) shall be used.
- c. In any calculation, a safety is for thell be applied based upon banchmark comparisons of the code and data collected from known and measured environments.

Acceptince Criteria

 Maximum expected radiation levels are well within (25% rr less) of the radiation zone designation, or each plant area, as indicated in Figures Certified Design Commitment

- The plant design shall provide shielded cubicles, labyrinth access, and space for temporary shielding to allow for maintenance of plant components without significant rediation exposure from adjecent plant systems or equipment.
- The plant rediation shielding design shall parmit operators to perform required safety functions in vital areas of the plant (including access and agress of these areas) under accident conditions.

Inspections, Analyses

- Using the methods totalized in (1) above, rediation 1 als present to us where meintenents is participant and be evaluated for the continuum and evaluated rediation areas and equipment.
- 3. An enalysis of the expected high rediation levels in each area which will or may require occupancy to permit an operator to aid in the mitigation of or recovery from an accident (vitel area) shell be performed to verify the adequacy of the plant shielding design. This analysis shall use calculational methods consistent with (1.b) above and a rediation source term (edjuated for redinactive decay) based on the following:
 - s. Liquid containing systems: 100% of the core equilibrium noble gas inventory, 50% of the core equilibrium halogen inventory and 1% of all others are assumed to be mixed in the reactor coolent and recirculation liquids recirculated by the residual heat removel system (RHR), the high presture core flooder (HPCF), and the reactor core issistium cooling (RCIC) systems.
 - b. Ges containing systems: 100% of the core equilibrium noble ges inventory and 25% of the core equilibrium helogen activity are assumed to be mixed in the containment atmosphere. For vapor containing systems (such as the main steen lines) these cure inventory fractions are assumed to be contained in the reactor coolant vapor space.

Acceptance Criterla

- Shielding design (with temporar; shielding installed, where appropriate) is such that redistion from acjscent areas shell contribute no more than a small fraction (10% or tess) of the redistion field intensity or less from 0.06mrem/hr whichever is larger, in plant areas where maintenance is performed.
- 3. Under accident conditions, redistion shielding design ellows access, accupancy and egress of vital areas such that personnel redistion exposures do not exceed 5 ree to the whole body, or its equivalent, for the duration of the accident (based on the required frequency of access to each vital area). For areas requiring continuous occupancy (such es the control room), local redistion hot spots shall not exceed 15 mrem/hr (eveneged over 30 days).

Certified Design Commitment

 The plant design shall provide radiation shielding to maintain radiation exposure to the general public as low as is reasonably achievable. Inspections, Tests, Analyses

 Using the methods identified in (1) above, the redistion dose to the meximally exposed member of the general public from direct and scattered shall be detensined. Acceptance Criteria

 The radiation dose to the maximally exposed member of the public is a small fraction (10% or lass) of the dose limit to a member of the public listed in 40CFR190.

Table 3.2b: VENTILATION AND AIRBORNE MONITORING

Certified Design Commitment

 Plant design shalt provide adequate containment of sirborne radioactive materials and the ventilation system will ensure that concentrations of sirborne radionuclides are maintained at levels consistent with personnel access requirements. Inspections, Tests, Analyses

Expected concentrations of sirborne redicactive material shall be calculated by nuclide for normal plant operations, anticipated operational occurrences for each equipment cubicle, corridor, and operating area requiring personnal access. Calculations shall consider:

- Besign ventilation flow rates for sections.
- b. Typical leakage characteristics for equipment located in each area, and
- b. A rediation source term in each fluid system shall be datermined based upon an assumed offges rate of 180,800 Curis/second (30 minute decay) appropriately adjusted for radiological decay and buildup of activated corrosion and wear products.

Acceptance Criteria

- Calculation of rarioactive eirborne concentration shell demonstrate that;
 - a. For normally occupied rooms and areas of the plant (i.e. those areas requiring routine access to operate and maintain the plant) equilibrium concentrations of airborne nuclides will be a small fraction (10% or less) of the occupational concentration limits listed in 10 CFR 20 Appendix 8.
 - b. For rooms that require infrequent access (such as for non-routine equipment meintenance), the ventilation system shell be capable of reducing redioactive airborne concentrations to (and meinteining them at) the occupational concentration timits listed in 10KFR20 Appendix 8 during the periods that occupancy is required.
 - c. For rooms that seldom require access (such as tank rooms), plant design shall provide sufficient containment and ventilation to ensure airborne contamination does not spread to other areas.

Certified Design Commitment

 Airborne radioactivity monitoring shall be provided for those normally occupied ereas of the plant in which there exists as significant potential for minborne contamination (greater than 0.1 per year) Inspections, Tests. Analyses

 An analysis shall be performed to identify the plant ereas that require airborne radioactivity monitoring.

Acceptance Criteria

- Airborne redicactivity monitoring system shall:
 - a. Have the capability of detecting the time integrated change in concentrations of the most limiting particulate and iodina radionuclides in such area equivalent to the occupational concentration limits in 1905FR20, Appendix 8 for 10hours.
 - b. Provide e calibrated response, representative of the concentrations within the area (i.E. air sampling menitors in ventilation exhects streams shall collect and isokinetic sample).
 - c. Provide local audible alarms (visual alarms in high noise areas) with variable alarm set points, and readout/ennunciation capability in the control room.

17m Rem/hr. In the ABWR, the ptimary source of radiation exposure, the recirculation lines and pumps, have been removed. Overall the reduction in drywell dose level is for these types of maintenance is expected to be a factor of two or 9mRem/hr. Overhead tracks and in place removal equipment is provided in the ABWR for an estimated person power reduction to 1.150 person-hour per year broken down into 200 person-hours for 18 SRV maintenance at 6mRem/hr, 200 person-hours per year to pull and replace 3 RIPs with one heat exchanger at 20mRem/hr, and the remainder on miscellancous valves at 4.5mRem/hr.

- (3) Control rod drive maintenance is significantly reduced in the ABWR with the introduction of fine motion control rud drives (FMCRD). Based upon European experience, two FMCRDs will be replaced and repaired per outage along with twenty motors. Estimated work will consist of 64 person-hours under vessel preparation, 40 person-hours FMCRD removal and reinstallation, 200 person hours motor removal and installation, and 64 person-hours cleanup. Typical under vessel effective dose rates are 17mRem/hr but because of the removal of the recirculation pumps and lines (has) been reduced to tool tote truce 6.5mRem/hr.
- (4) The LPRM/ fIP system assumes the servicing of two sensors per year and is based upon a total of 200 person-hours per year at an effective dose rate of 50mRem/br which is typical for BWK operations.
- (5) Inservice inspection consists of primarily NDE examination of vessel and piping systems and welds. Typical BWR values are 2400 person-hours per year at 12mRem/hr effective exposure rate. ABWR inservice inspection is estimated based upon the following:

Elimination of recirculation lines and pumps with the following savings:

Elimination of 14 nozzle inspections at 2 per year, saving 360 person hours

Elimination of shield penetration and shield plug removal saving 240 person hours per year LIASIOOAL Rev. B

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Reduction on wold inspection on recirculation lines estimated at 240 person hour pet year

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Reduction in drewell dose by 50% with the provision that the feedwater line dose is more than half the recirculation line dose and general drywell dose level and therefore removal of recirculation line inspection is estimated to be weighted at twice the general dryweil dose rate.

Overall it is estimated that by use of automated turtles for inspection person-hour expended in ISI will be reduced by a factor of two.

The ABWR uses a forged ring pressure vessel in comparison to older plate welded vessels reducing the total vessel weld length inspection by 30% and the total weld inspection by 10%. We the Aquite

The ABWR design incorporates specific access into inspection areas past insulation areas with an estimated savings of 120 person-hours

Overall person-hours reduction is 1,200 nerson-hours at approximately half the typical effective dose rate or 5.5mRem/hr.

(6) Other drywell work includes items such as minor valve maintenance, instrumentation work, and all other drywell work. <u>Typical BWR work in this area estimates 5,500 person-hours per year at 17 mRem/hr</u> Overall reduction in this effort due to ABWR design improvements are:

> Significant savings in total hours are estimated due to removal of the recirculation lines with miscellaneous recirculation line work such as line snubbers, fewer drywell cooling units, and less assembly/disassembly work on insulation due to the use of automated units. Overall it is estimated that 2,000 person hours savings can be made.

> Overall reduction in the drywell radiation due to removal of the recirculation system results in the reduction of the overall upper drywell dose rate to 1.8mRem/hr and the lower drywell dose rate to 5.6mRem/hr since the components involved such as drywell coolers typically do not carry radioactive inventory. Assuming that of the remaining 3,500 person-hour, 2 000 is upper drywell work and 1,500 is lower drywell work at their respective effective dose rates.

12.4.2 Reactor Building Dose

The following provides the basis by which the reactor building dose estimates for occupational exposure were made.

- (1) Vessel access and reassembly typically requires 4500 person-hours of work at an effective dose rate of 3 mr/hr. The ABWR work will involve the use of a stud tensioner for a 96 bolt top head. The projected time to remove 96 bolts with this equipment is between 600 to 1200 person-hours. Due to the larger ABWR vessel and expected reduced water contamination with the improved clean up system, the estimated projected effective dose rate is 1.5 mRem/hr.
- (2) ABWR refuelling is accomplished via an automated refuelling bridge. All operations for refuelling are accomplished from an enclosed automation center, off the refuelling floor. Time for refuelling is reduced from a typical 4,400 person hours down to 2,000 person and from an effective dose rate of 2.5 mRem/hr to less than 0.2mRem/hr.
- (3) RHR/CUW maintenance work consists of inspections for two pumps per year in each system. In the RHR system this consumes 150 person-hours per year at an effective dose rate of 40mRem/hr. In the CUW system this typically uses 1400 person-hours per year at an effective dose rate of 14mRem/hr. ABWR will use canned pumps for both system with an estimated reduction in maintenance to 100 person-hours per pump. With improved water chemistry and overall reductions in reactor water concentrations due to the two percent cleanup system the effective dose rate is estimated at twenty percent of the typical value for these system.
- (4) FMCRD rebuilding estimates are taken from similar work done in Europe since no significant U.S. data exists to date. Two drives will be rebuilt at an effective dose rate of 4.5 mRem/hr and 30-60 hours per drive.
- (5) Instrumentation work typically requires 1,000 person-hours of work per year at an effective dose rate of 5.0 mRem/hr. ABWR should take about the same effort in instrumentation, however because of the increased emphasis and

improved water chemistry systems, should reduce the effective dose rate to two-thirds the typical value or 3.0mRem/hr.

All other work in the reactor building typically takes 7,400 person-hours per year at an effective dose rate of 28mRem/hr. This work includes all valve work, RIP rebuild work, minor maintenance, and CRD hydraulic line work. The major task in this area is the hydraulic control units which require 5,000 person-hours per year at an effective. dose rate of 3.3mRem/hr. With the use of the FMCRD units, an additional savings of 2,000 person-hours is anticipated. In addition, the ABWR reactor building has been designed to provide for ease of maintenance with overhead lifts, coordinated hatch ways and ample space to maintain in place equipment. In addition, with the exception of one tank and the pressure vessel, all the equipment in the reactor building is removable with those pieces which can be expected to be moved being palatalized. Because of these factors, an overall reduction in work of 1,000 person-hours is estimated. Because of the improved water chemistry the overall effective dose rate is anticipated at one-half the typical BWR dose rate.

12.4.3 Radwaste Building Dose

Radwaste building work consists of pump and valve maintenance, shipment handling, radwaste management, and general clean up activity. Typically, 6,700 hours are expended per year at an effective dose rate of 5.5mRem/hr. The ABWR radwaste building is designed along the same lines as newer radwaste facilities overseas. The building incorporates enhanced remote control and shielding for handling of resin materials which is expected to reduce overall maintenance by 1500 to 2000 hour per year at significantly reduced dose levels. In addition, radwaste pumps for ABWR are expected to utilize air driven. rack mounted pumps. Such pumps which are designed to handle slurries have been proven to show much longer life times between maintenance and being basically a very small portable pump, can be readily replaced. Replaced pumps are then subject to intense chemical decontamination prior to maintenance and repair. Overseas utilities have reported occupational exposures typically less than 1 person-rem per year using this design. For ABWR assuming 2,000 hours" reduction in maintenance due to remote handling and an additional 500 hours reduction for pump replacement, 4,200 hours per year are estimated with

12.4.2.1

reduced effective dose rates of 2.5mRem/hr owing primarily to remotting those jobs involving high radiation exposure.

12.4.4 Turbine Building Dose

- Typical BWR valve maintenance in the turbine building uses 1.150 hours per year at an effective dose rate of 9.5mRem/hr. The valve maintenance requirements for ABWR do not vary significantly over current plants, increfore the total hours for this type of work is assumed as approximately the same excepting minor adjustments for improved valves, maintenance jigs, and automated devices will lower the estimated maintenance time to 1,000 hours. The effective dose rate of 9.5 mRem/hr is estimated at more than one half this value due to basically improvements in BWR fuel over the generation of fuel from which this data was taken bringing the effective dose rate down to 3.9mRem/hr. (In addition, beta shielding is recommended for work on valving where possible which it is estimated will reduce the overall effective dose rate by an additional 10% to 3.5mR.em/hr.
- (2) In a similar fashion the turbine maintenance work typically requires 18,500 hours of work at an effective dose rate of 0.3mRem/hr. With additional operational improvements in automating turbine maintenance, overall work is estimated to be reduced to 15,500 hours. The effective dose rate for the turbine is not expected to be as sensitive to fuel performance as will the turbines but is estimated to reflect a decrease in dose to 0.2mRem/br for turbine overhaul work.
- (3) Work on the turbine hall condensate system typically requires 2,000 hours per year at an effective dose rate of 7.5mrem/hr. The condensate system in ABWR uses hollow-fiber filled filter: which require half the maintenance of a typical system. In addition, with the plant incorporating Fe control in the feedwater system and a significant reduction in cobalt bearing materials, the overall effective dose rate is estimated at half the above value.
- (4) Other work in the turbine building typically vakes 13,140 hours per year at an effective dose rate of 0.1mRem/hr. Only minor changes can be assumed with ABWK with some remote operations and slight reductions in operating

exposures. For the ABWR it is estimated that a 10¹⁰ reduction can be realized with improving technology with no significant change in dose rate.

12.4.5 Work at Power

Work at power typically requires 5,000 hours per year at an effective dose rate of 6.6mRem/hr for the SWR. This category covers literally all aspects of plant maintenance performed during normal operations from health physics coverage to surveillance, to minor equipment adjustment, and minor equipment repair. Overall the ABWR has been designed with more automated and remotted equipment. It is expected that items of routine monitoring will be performed by camera or additional instrumentation. Most equipment in ABWR is palatalized which parmits quick and easy replacement and removal for decont mination and repair. Therefore a reduction in actual hours need at power is estimate at 1,000 hours less than the typical value. In the area of effective dose rate, the ABWR isexpected to have significantly lower general radiation levels over current plants owing to more stringent water cheiristry controls, a full flow condensate flow system, a 2% cleap up water program, útanium condenser tubes, Fe feedwater control, and low cobalt usage. In addition, the ABWR is the most compartmentalized BWR design which (1) permits better shielding in specific work areas, and (2) lowers collateral radiation contamination. Overall then it is estimated that the effective dose rate for work at power will be slightly over two thirds the typical rate or 4.0mRem/hr.

12.4.6 References

- Knecht, P.D., BWR/6 Drywell and Containment Maintenance and Testing Access Time Estimates, GE Report NEDE-23819, May 1978.
- Knecht, P.D., Maintenance Access Time Estimates, BWR/6 Radwaste Building, GE Report NEDE-23996-2, May 1979.
- Knecht, P.D., Maintenance Access Time Estimates, BWR/6 Auxiliary and Fuel Buildings, GE Report NEDE-23996-1, May 1979.
 - Study of Advanced BWR Features, Plant Definition/Feasibility Results, Volume III, Appendix Part G, GE NEDE-24679, Oct 1979.

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Table 12.4-1

Operation	SSAR	Hours		Person-
Task	Section	per year	mRem/hr	Rem (yr
Drywell				
MSIV	12.4.1(1)	4.200	1.5	6.3
SRV, RIP, etc	12.4.1(2)	1,150	7.5	8.6
FMCRD	12.4.1(3)	370	6.5	2.4
LPRM/TIP	12.4.1(3)	200	50.0	10.0
ISI	12.4.1(5)	1,200	5.5	6.6
Other	12.4.1(6)	3,500	3.5	12.5
Total		10,620		46.2
Reactor Building				
Vessel	12.4.2(1)	1.200	1.5	1.8
Refueling	12.4.2(2)	2.000	0.2	0.4
RHR/CUW	12.4.2(3)	400	8.0	3.2
FMCRD	12.4.2(4)	120	4.5	0.5
Instrument	12.4.2(5)	1,000	3.0	3.0
Other	12.4.2(6)	4,400	1.5	6.6
Total		9,120		15.5
Radwaste Building	12.4.3	4,200	2.5	10.5
Turbine Building			8.9	3.9
Valve Maint	12.4.3(1)	1,000	3.8-	3.5-
Turbine Ovrhl	12.4.4(2)	(5,500	0.2	3.1
Condensate	12.4.4(3)	1,000	3.5	3.5
Cther	12.4 4(4)	11,800	0.1	1.2
Total		29,300		M3 11.7
Work & Power	12.4.5	4,000	4.0	16.0
Totals		48,120		99,5 g

PROJECTED ANNUAL RADIATION EXPOSURE

Revision 1

Replace paragraph beginning with "Reduction in drywell dose by 50% " with:

Reduction in drywell dose by 50% based upon the assumption that the contact dose rate on the feedwater line is less than half the contact dose rate on the typical BWR recirculation line. Hence at equal distances from the line, the tran general drywell dose rate which is dominated by the recirculation and feedwater lines will be less than half what is typically seen with recirculation lines.

Revision 2

Peplace paragraph beginning with "The ABWR design incorporates" with:

The ABWR design incorporates specific access panels and shield doors into required inspection areas permitting easy bypass of insulation areas resulting in an estimated person hour savings of 120 person hours.

Revision 3

Replace sentence beginning with "Typical BWR work in this......" with:

These miscellaneous tasks in the drywell consume on the average 5,500 person-hours per year in a radiation field of 17mRem/hr. However, this average is a combination of some specific higher radiation tasks such as work on recirculation lines (involving snubbers, weld inspection, etc) and many lower radiation tasks so as work on drywell coolers.

Revision 4

Replace sentences beginning with "For ABWR assuming 2,009 ... " to end of paragraph with:

For ABWR, it is then assumed that the maintenance effort expended per year is reduced by 2,000 person hours from 6,700 to 4,700 person hours due to the introduction of automated equipment. An additional reduction of 500 person hours down to 4,200 person hours is assumed based upon the use of air pumps as specified above. The overall radiation field to which the worker is exposed on the average is then expected to be reduced from 5.5mRem/hr to 2.5mRem/hr since most of the high radiation tasks are eliminated by automation or remoting the tasks or in the case of the air pumps reduced by decontamination at separate facilities prior to pump maintenance.

Revision ?

Replace sentences beginning with "The effective dose rate of 9.5....." to end of paragraph with:

In the ABWR, the estimated effective radiation field of 3.9 mRem/hr for turbine building work is expected to be less than half the typical dose rate of 9.5mRem/hr due to the use of newer fuels which are less resistant to pin size leaks. The radiation fields in the turbine hall during maintenance are a combination of contamination from fission products from the fuel and corrosion products from the vessel and piping. Offgas measurements of the performance of the newer fuels when operated under proper water comistry standards (required for ABWR) have shown fission product releases and arow of magnitude less than older fuels. Likewise the ABWR has placed stringent controls over material usage especially in the vessel and other high temperature components to minimize corrosion product releases.

Revision 6

Replace sentences beginning with "In addition, the ABWR is....." to end of paragraph with:

In addition, the ABWR has in the basic design, compartmentalized all major pieces of equipment so that any piece of equipment can be maintained or removed for maintenance without affecting the normal plant operations. This design concept thereby reduces radiation exposure to personnel maintaining or testing one piece of equipment from both shine and airborne contamination from other equipment. Finally, the ABWR has incorporated in the basic design the use of Hydrogen. Water Chemistry (HWC) and the additional shielding necessary to protect from the factor of four increase in N-16 shine produced through the steam lines into the turbine building. For normally occupied areas, sufficient shielding is provided to protect from N-16 shine. In areas which may be occupied temporarily for specific maintenance or surveillance tasks and where additional shielding is not appropriate (for the surveillance function) or deemed reasonable, the HWC injection can be stopped causing the N-16 shine to decrease to within normal operating BWR limits within 90 seconds and thus permitting those actions needed. Overall, it is estimated that the effective dose rate for work at power will be slightly over two thirds the typical rate or 4.0 mRem/hr.



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ABWR

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Subject AMENDMENT 21 REVISION to Section 12.4

Message

CONTRACTOR CONTRACTOR

17m Rem/hr. In the ABWR, the primary source of radiation exposure, the recirculation lines and pumps, have been removed. Overall the reduction in drywell dose level is for these types of maintenance is expected to be a factor of two or 9mRem/hr. Overhead tracks and in place removal equipment is provided in the ABWR for an estimated person-hour reduction to 1,150 person-hour per year broken down into 200 person-hours for 18 SRV maintenance at 6mRem/hr, 200 person-h. ars per year to pull and replace 3 RIPs with one heat exchanger at 20mRem/hr, and the remainder on miscellaneous valves at 4.5mRem/hr

- (3) Control vod drive inaintenance is significantly reduced in the ABWR with the introduction of fine motion control rod drives (FMCRD). Based upon European experience, two FMCRDs will be replaced and repaired per outage along with twenty motors. Estimated work will consist of 64 person-hours under vessel preparation, 40 person-hours FMCRD removal and reinstallation, 200 person hours motor removal and installation, and 64 person-hours cleanup. Typical under vessel effective dose rates are 17mRem/hr but because of the removal of the recirculation pumps and lines dose rate have been reduced to 6.5mRem/hr.
- (4) The LPRM/CIP system assumes the servicing of two sensors per year and is based upon a total of 200 person-hours per year at an effective dose rate of 50mRem/hr which is typical for BWR operations.
- (5) Inservice inspection consists of primarily NDE examination of vessel and piping systems and welds. Typical BWR values are 2400 person-hours per year at 12mRem/hr effective exposure rate. ABWR inservice inspection is estimated based upon the following:

Elimination of recirculation lines and pumps with the following savings:

Elimination of 14 nozzle inspections at 2 per year, saving 360 person hours

Elimination of shield penetration and shield plug removal saving 240 person bours per year Elimination of weld inspection on | recirculation lines estimated at 240 person hour per year

Ecduction in drywell dose by 50% based upon the assumption that the contact dose rate on the foedwater line is less than half the contact dose rate on the typical BWR recirlation line. Hence at equal distances from the line, the total general drywell dose rate which is dominated by the recirculation and fuedwater lines will be less than half what is typically seen with recirculation lines.

Overall it is estimated that by use of automated turtles for inspection person-hour ex, ended in ISI will be reduced by a factor of two.

The ABWR uses a forged ring pressure vessel in comparison to older plate welded vessels reducing the total vessel weld length inspection by 30% and the total weld inspection in the drywell by 10%.

The ABWR design incorporates specific access panels and shield doors into required inspection areas permitting easy bypass of insulation areas resulting in an estimated person hour savings of 120 person hours.

Overall person-hours reduction is 1,200 person-hours at approximately half the typical effective dose rate or 5.5mkcm/hr.

(6) Other drywell work includes items such as minor valve maintenance, instrumentation work, and all other drywell work. These miscellaneous tasks in the drywell consume on the average 5,506 person-hours per year in a radiation field of 17mRem/hr. However, this average is a combination of some specific higher radiation tasks such as work on recirculation lines (involving snubbers, weld inspection, etc) and many lower radiation tasks such as work on drywell coolers. Overall reduction in this effort due to ABWR design improvements are:

Significant savings in total hours are estimated due to removal of the recirculation lines with miscellaneous recirculation line work such as line snubbers, fewer drywell cooling units, and less assembly/disassembly work on insulation due to the use of automated units. Overall it is estimated that 2,000 person hours savings can be made.

Overall reduction in the drywell radiation due to removal of the recirculation system results in the reduction of the overall upper drywell dose rate to 1.8mRem/hr and the lower drywell dose rate to 5.6mRem/hr since the components involved such as drywell coolers typically do not carry radioactive investory. Assuming that of the remaining 3,500 person-hour, 2,000 is upper drywell work and 1,500 is lower drywell work at their respective effective dose rates.

12.4.2 Reactor Building Dose

The following provides the basis by which the veactor building dose estimates for accupational exposure were made.

- (1) Vessel access and reassembly typ.cally requires 4500 person-hours of work at an effective dose rate 13 mr/hr. The ABWR work will involve the use of a stud tensioner for a 96 bolt top head. The projected time to remove 96 bolts with this equipment is between 660 to 1200 person-hours. Due to the larger ABWR vessel and expected reduced water contamination with the improved clean up system, the estimated projected effective dose rate is 1.5 mRetn/hr.
- (2) ABWR refuelling is accomplished via an automated refuelling bridge. All operations for refuelling are accomplished from an enclosed automation center off the refuelling floor. Time for refuelling is reduced from a typical 4,400 person-hours down to 2,000 person and from an effective dose rate of 2.5 mRem/hr to less than 0.2mRein/hr
- (3) RHR/CUW maintenance work consists of inspections for two pumps per year in each system. In the RHR system this consumes 150 person hours per year at as effective dose rate of 40mRem/hr. In the CUW system this typically uses 1400 person-bours per year at an effective dose rate of 14mRem/hr. ABWR will use canned pumps for both system with an estimated reduction in maintenance to 100 person-hours per pump. With improved water chemistry and overall reductions in reactor water concentrations due to the two percent cleanup system the effective dose rate is estimated at twenty percent of the typical value for these system.

- (4) FMCRD rebuilding estimates are taken from similar work done in Europe since no significant U.S. data exists to date. Two drives will be rebuilt at an effective dose rate of 4.5 mRem/hr and 30-60 hours per drive.
- (5) Instrumentation work typically requires 1,000 person-hours of work per year at an effective dose rate of 5.0 mRem/hr. ABWR should take about the same effort in instrumentation, however because of the increased emphasis and improved water chemistry systems, should reduce the effective dose rate to two-thirds the typical value or 3.0mRem/hr.
- All other work in the reactor building typically takes 7,400 person-hours per year at an effective dose rate of 2.8mRem/hr. This work includes all valve work, RIP rebuild work, minor maintenance, and CRD hydraulic line work. The major task in this area is the hydraulic control units which require 5,000 person-hours per year at an effective dose rate of 3.3mRem/hr. With the use of the FMCRD units, an additional savings of 2,000 person-hours is anticipated. In addition, the ABWR reactor building has been designed to provide for ease of maintenance with overhead lifts, coordinated hatch ways and ample space to maintain in place equipment. In addition, with the exception of one tank and the pressure vessel, all the equipment in the reactor building is removable with those pieces which can be expected to be moved being palatalized. Because of these factors, an overall reduction in work of 1,000 person-hours is estimated. Because of the improved water chemistry the overall effective dose rate is anticipated at one-half the typical BWR dose rate.

12.4.3 Radwaste Building Dose

Radwaste building work consists of pump and valve maintenance, shipment handling, radwaste management, and general clean up activity. Typically, 6,700 hours are expended per year at an effective dose rate of 5.5mRem/hr. The ABWR radwaste building is designed along the same lines as newer radwaste facilities overseas. The building incorporates enhanced remote control and shielding for handling of resin materials which is expected to reduce overall maintenance by 1500 to 2000 hour per year at significantly reduced dose levels. In addition, radwaste

numps for ABWR are expected to utilize air driven, rack mounted pumps. Such pumps which are designed to handle slurries have been proven to show much longer life times between maintenance and being basically a very small portable pump, can be readily replaced. Replaced puraps are then subjent to intense chemical decontamination prior to maintenance and repair. Overseas utilities have reported occupational exposures typically less than 1 person-rom per year using this design. For ABWR, it is then assumed that the maintenance effort expended per year is reduced by 2,000 person hours from 6,700 to 4,700 person hours due to the introduction of automated equipment. An additional reduction of 500 person hours down to 4,200 person hours 's assumed based upon the use of air pumps as specified above. The overall radiation held to which the worker is exposed on the average is then expected to be reduced from 5.5mRem/hr to 2 5mRem/by since most of the high radiation tasks are eliminated by automation or remoting the tasks or in the case of the air pumps reduced by decontamination at separate facilities prior to pump maintenance.

12.4.4 Turbine Building Dose

(1) Typical BWR valve maintenance in the turbine building uses 1,150 hours per yea, at an effective dose rate of 9.5mRem/hr. The valve maintenance requirements for ABWR do not vary significantly over current plants, therefore the total hours for this type of work is assumed as approximately the same excepting minor aujustments for improved valves, maintenance jigs, and automated devices will lower the estimated maintenance time to 1,000 hours. In the ABWR, the estimated effective radiation field of 3.9 mRem/hr for turbine building work is expected to be less than half the typical dose rate of 9.5mRem/h- due to the use of newer fuels which are the resistant to pin size leaks. The radiation fields in the turbine hall during maintenance are a combination of contamination from fission products from the fuel and corrosion products from the vessel and piping. Offgas measurements of the performance of the newer fuels when operated under proper water chemistry standards (required for ABWR) have shown fission product releases and order of magnitude less than older fuels. Likewise the ABWR has placed stringent controls over material usage especially in the vesse! and other high temperature components to minimize corrosion product releases.

- (2) In a similar fashion the turbine maintenance work typically requires 18,500 hours of work at an effective dose rate of 0.3mRem/hr. With additional operational improvements in automating turbine maintenance, overall work is estimated to be reduced to 15,500 hours. The effective dose rate for the turbine is not expected to be as sensitive to fuel performance as will the turbines but is estimated to reflect a decrease in done to 6.2mRem/hr for turbine overhaul work.
- (3) Work on the turbine hall condensate system typically requires 2,000 hours per year at an effective dose rate of 7.5mrem/hr. The condensate system in ABWR uses hollow-fiber filled filters which require half the maintenanc: of a typical system. In addition, with the plant incorporating Fe control in the feedwater system and a significant reduction in cobalt bearing materials, the overall effective dose rate is estimated at half the above value.
- (4) Other work in the turbine building typically takes 13,140 hours per year at an effective dose rate of 0.1mRem/hr. Only minor changes can be assumed with ABWR with ome remote operations and slight reductions in operating exposures. For the ABWR it is estimated that a 10% reduction can be realized with improving technology with up significant change in dose rate.

12.4.5 Work at Power

Work at power typically requires 5,009 hours per year at an effective dose rate of 6.6mRem/hr for the BWR. This category covers literally all aspects of plant maintenance performed during normal operations from health physics coverage to surveillance, to minor equipment adjustment, and minor equipment repair. Overall the ABWR has been designed with more automated and remotted equipment. It is expected that items of routine monitoring will be performed by camera c: additional instrumentation. Most equipment in ABWR is palatalized which permits quick and easy replacement and removal for decontamination and repair. Therefore a reduction in actual hours need at power is estimate at 1,000 hours less than the typical value. In the area of effective dose rate, the ABWR is expected to have significantly lower general radiation levels over current plants owing to more stringent water

chemistry controls, a full flow condensate flow system, a 2% clean up water program, titanium condenser tubes, Fe feedwater control, and low cobalt usage. In addition, the ABWR has in the basic design, compartmentalized all major pieces of equipment so that any piece of equipment can be maintained or removed for maintenance without affecting the normal plant operations. This design concept thereby reduces radiation exposure to persound maintaining or testing one piece of equipment from both shine and airborne contamination from other equipment. Finally, the ABWR has incorporated in the basic design the use of Hydrogen Water Chemistry (HWC) and the additional shielding necessary to protect from the factor of four increase in N-16 shine produced through the steam lines into the turbine building. For normally occupied areas, sufficient shielding is provided to protect from N-16 shine. In areas which may be occupied temporarily for specific maintenance or surveillance tasks and where additional shielding is not appropriate (for the surveillance function) or deemed reasonable, the HWC injection can be stopped causing the N-16 shine to decrease to within normal operating BWR limits within 90 seconds and thus permitting those actions needed. Overall, it is estimated that the effective dose rate for work at power will be slightly over two thirds the typical rate or 4.0 mRem/hr.

12.4.6 References

- Knecht, P.D., BWR/6 Drywell and Containment Maintenance and Testing Access Time Estimates, CE Report NEDE-23819, May 1978.
- Knecht, P.D., Maintenance Access Time Estimates, BWR/6 Radwaste Building, GE Report NEDE-23996-2, May 1979.
- Knecht, P.D., Maintenance Access Time Estimates, BWR/6 Auxiliary and Fuel Buildings, GE Report NEDE-23996-1, May 1979.
- Study of Advanced BWR Features, Plant Definition/Feasibility Results, Volume 111, Appendix Part G, GE NEDE-24679, Oct 1979.

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Table 12.4-1

PROJECTED ANNUAL RADIATION EXPOSURE

Operation	SSAR	Rours		Person-
Task	Section	per year	mRem/hr	Rem/yr
Drywell				
MSIV	12.4.1(1)	4,200	1.5	6.3
SRV,RIP,etc	12.4.1(2)	1,150	7.5	8.6
FMCRD	12.4.1(3)	370	6.5	2.4
LPRM/TIP	12.4.1(4)	200	50.0	10.0
151	12.41(5)	1,200	5.5	6.6
Other	12.4.1(6)	3,500	3.5	12.3
Total		10,620		46.2
Reactor Building				
Vessel	12.4.2(1)	1,200	1.5	1.8
Refueling	12.4.2(2)	2.000	6.2	0.4
RHR/CUW	12.4.2(3)	400	8.0	3.2
FMCRD	12.4.2(4)	120	4.5	0.5
Instrument	12.4.2(5)	1.000	3.0	3.0
Other	12,4,2(6)	4,400	1.5	6.6
Total		9,120		15.5
Radwaste Building	12.4.3	4,200	2.5	10.5
Turbine Building				
Valve Maint	12.4.4(1)	1.000	3.9	3.9
Turbine Ovrhl	12.4.4(2)	15,500	0.2	3.1
Condensate	12.4.4(3)	1.000	3.5	3.5
Other	17.4.4(4)	11.800	0.1	1.2
Total		29,300		11.7
Work at Power	12.4.5	4,000	4.0	16.0
Totals		48,120		99.9