ATTACHMENT 2

SAFETY ANALYSIS REPORT FOR THE OPERATION OF THE ON-SITE LOW-LEVEL RADIOACTIVE WASTE HOLDING FACILITY (INTERIM STORAGE) AT SUSQUEHANNA STEAM ELECTRIC STATION

AUGUST 1981

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1.0 INTRODUCTION

This is the safety analysis report to support the application of the Pennsylvania Power and Light Company and the Allegheny Electric Cooperative, Inc. to store waste in a Low-level Radioactive Waste Holding Facility (LLRWHF) at the Susquehanna Steam Electric Station (SSES). The LLRWHF is designed to safely store about 60,000 cubic feet of low-level radioactive waste per year from both units for up to a four year period. This facility is to be used for contingency storage in the event that offsite disposal facilities are not avalible.

The purpose of this report is to determine the effects of possible process disturbances or postulated component failures and to ensure the facility's design adequacy to control or mitigate the consequences of these events and failures.

2.0 FACILITY DESIGN

The LLRWHF, shown in Figures 2.0-1 & 2.0-2, is designed to store all the dry activated (trash) and dewatered solidified (cement) low-level radioactive wastes generated by SSES for the equivalent of 8 reactor-years. These wastes would be stored in the facility for up to four years or until they can be shipped to permanent disposal facilities offsite. (See Ref. 5.1)

The overall facility dimensions will be 73 meters(240 feet) X 88 meters(288 feet) with a centerline elevation of 13 meters(42 feet). In addition, a control and equipment room 6 meters(20 feet) X 9 meters(30 feet) will be located adjacent to the facility's north wall approximately 5 meters(16 feet) from the northeast corner.

The LLRWHF consists of concrete storage vaults and an open waste storage area within the confines of an uninsulated steel-framed, metal-sided structure which provides weather protection. The storage vaults are provided with concrete walls and covered with precast, reinforced concrete shield panels. Each panel contains a number of circular removable plugs or cell covers to permit the loading and unloading of individual storage cells without removing the entire shield panel.

A curb is provided around the perimeter of the facility to contain any liquid such as rainwater or fire sprinkler water which may be introduced into the building. The curb can contain the volume of fire protection water released if all the sprinklers are actuated in the maximum credible fire event for a period of one half hour.

2.1 Container Design

The storage containers to be stored in LLRWHF are designed to preclude or reduce the occurrence of uncontrolled releases of radioactive materials due to handling, transportation, or storage.

Container materials conform to the requirements established in NUREG 75/087 (Section 11). The containers are designed to contain the solidified waste material without loss of container integrity until final disposal. The waste container materials do not support combustion. The following container types may be used in this facility:

Manufacturer	Designation	Volume	Diameter	Height
United Nuclear	50 CFL	50 cu.ft.	48"	53-7/8"
Hittman	HN-100	163 cu.ft.	72-3/8"	72-3/4"
Hittman	HN-200	75 cu.ft.	52-3/8"	61-3/8"
Hittman	HN-600	83 cu.ft.	72-3/8"	40"
Chem-Nuclear	14-195	200 cu.ft.	76"	79"
Chem-Nuclear	6-80	85 cu.ft.	58"	57-7/8"
CPC *	B-25	96 cu.ft.	50" x 46" x 72" (Rectangular)	
————	55 gal.drums	7.7 cu.ft.	1.95'	2.9'

* Container Products Corporation

2.2 Waste Materials

The LLRWHF is designed to store low level dewatered solidified radioactive wastes and the low level dry trash radioactive wastes. Should the need arise, it may also be used for the temporary storage of large pieces of contaminated or activated plant equipment. Temporary shielding will be provided for the contaminated equipment to ensure that radiation levels are within facility design limits. It will not be used for storage of gaseous wastes or wastes containing free liquids.

Solidified waste is defined as wet dewatered waste (e.g., evaporator bottoms, resins, and sludge) which is solidified and contains less than 0.5% free water by container volume or 1.0 gallon of liquid in the container, whichever is less. Low level dry trash is defined as contaminated material which contains sources of radioactive material that is dispersed in small concentrations throughout large volumes of inert material which contain no free water. Generally, this consists of dry material such as paper, trash, air filters, rags, clothing, small equipment, and other dry material.

A description of the solid radwaste system, including types and amounts of waste expect to be generated, is contained in Section 11.4 of the Susquehanna Steam Electric Station FSAR.

2.3 Fire Detection/Protection

The fire protection design is based on a combustible loading of 1200 pounds per square foot. The facility is provided with a fire detection system to provide an early warning alarm.

The entire building is provided with a dry pipe sprinkler system designed to deliver 0.25 gallons per square foot over the hydraulically most remote 2000 square foot area. The system uses sprinkler heads rated at 286 degrees Fahrenheit.

In the event of a fire in the facility the fire detection system automatically shuts down the ventilation system and annunciates an alarm in the main plant control room. In accordance with the plant procedures the operator summons the fire brigade. Should the ceiling temperature exceed 286 degrees Farhenheit, the fire sprinkler system is automatically actuated in the area of the fire.

Any water or other fire fighting materials introduced into the facility are considered contaminated until proven otherwise. If contaminated, they are disposed of accordingly.

2.4 Floor Drains

The floor drainage system is designed to collect any liquids that spill on the floor of the facility. The systen routes all drains to a collection sump located at the building periphery. The sump is equipped with liquid detection devices which provide annunciation in the main plant and facility control rooms whenever any liquid enters the sump.

The sump may be sampled and pumped to portable tanks from either inside or outside the building. There is no permanent pumping equipment installed or any piping connections to the main plant.

The areas inside the storage vault are also provided with drains to route free liquids to the sump.

2.5 Communications

The communication system allows two-way conversation and paging between the main plant and the facility. It is connected to the existing main plant communications sytem. It has one station for paging and conversation in the loading area. It has sufficient speakers inside the storage area to insure that paging or an alarm can be heard when the facility is at full capacity. It also has one station for paging and conversation in the facility control room. A telephone is provided in the LLRWHF control room to allow for both on and offsite communications.

2.6 Radiation Monitoring System

The radiation monitoring system is designed to monitor the general area radiation levels at various locations in the trash storage area, the loading area, and the facility control room. There is a readout for this system in the facilty control room.

2.7 Security

This system is an extention of the existing plant security system which monitors access to the facility. Normal facility access points are equipped with magnetic card readers. Unauthorized access initiates an alarm in the plant security system.

2.8 Loading Systems

The loading systems for the facility consist of transport vehicles (trucks and forklifts), an overhead crane with main and auxiliary hooks and a shield bell. These systems are capable of unloading, transporting within the facility, placing, retrieving, and reloading of cemented waste and the compacted dry trash. They have the capacity to lift, transport, and replace movable shielding devices.

The systems may be either directly or remotely operated and incorporate features to minimize operator radiation exposure in accordance with ALARA principles.

Dropped or damaged waste container can be retrieved for repackaging or other disposition.

2.9 Ventilation System

The facility ventilation system performs the following functions: 1) it removes noxious or irritating exhaust fumes whenever internal combustion engine powered machinery is operating inside the facility, and 2) it prevents excessive heat build-up from the roof in the summer.

The system is designed such that i moves air generally in an upward direction away from the equipment operators.

Air inlets are provided such that when the facility is closed, air entering the facility is evenly distributed and flows as described above. They are located and designed such that snow accumulation cannot significanly restrict the flow of air or be drawn into the facility.

The ventilation system does not provide any heating or cooling for the facility. It also does not provide any humidity control.

The building is provided with a smoke detection system. If smoke is detected, the ventilation system automatically shuts down and an annunciator actuates in the main plant and facility control rooms. The controls provide manual starting and stopping of the fans and manual override of the above described automatic shutdown function. The automatic shutdown and alarm are the only automatic control features of the system.

2.10 Trash Restraining System

The facility has a trash restraining system designed to prevent trash containers from being blown out of the facility during a tornado having a wind velocity up to 300 miles per hour.

The system is composed of nylon netting or other suitable material enclosing the trash storage area and secured to anchors in the foundation and floor slab. All tornado wind loading is transmitted directly into the anchors. The system is designed such that failure of the building structure will not tend to cause failure of the trash restraining system.

3.0 FACILITY OPERATION

The purpose of operating the facility is to temporarily store low-level radioactive waste generated by the plant until it can be shipped off-site. It is normally not occupied by plant personnel except during loading and unloading operations.

3.1 Loading and Unloading

Loading of the facility will generally proceed as follows for solidified waste. A truck loaded with a container of the waste will enter the facility in the unloading area. The waste containers will be inside a shielding device called a shield bell. The truck with the container and shield bell will stop in the overhead crane pickup area. Before any other unloading steps are taken, all personnel must move out of the storage area to a safe distance from the container or get behind shielding protection. The overhead crane then lifts the shield bell and container from the truck and moves it adjacent to its designated storage cell where the auxiliary crane hook removes the cell cover. The container and shield bell are then moved over the opened cell and the container is lowered into the cell. The shield bell is removed and the cover is replaced, whereupon the operation is complete.

Loading the facility with trash waste will take place in similar fashion. The truck with the 55 gallon drums on pallets will back onto the loading ramp adjacent to the trash storage area. It is then unloaded with a forklift or other appropriate machine. If required, depending on the dose rate from the containers, the forklift will be equipped with radiation shielding.

Unloading the LLRWHF will generally occur in the reverse order of the loading sequence.

3.2 Storage Patterns

To maximize the wastes' self shielding properties and minimize personnel exposure, the lower activity wastes are to be stored around the facility periphery and, if practical, on the top layer of each storage area.

The shielded concrete vault and the open storage areas are designed to hold the solidified waste and the trash cotainers, respectively.

4.0 SAFETY ANALYSIS

Due to the facility design, the possibility of an equipment failure or serious malfunction is remote. Because strict adnininstrative controls will be exercised during waste transfer operations the possibility of an accident caused by human error is also minimized. However, an accident analysis has been performed to demonstrate the facility's capability to control or mitigate the consequences of postulated failures or accidents. These accidents are divided into two categories: 1) handling and storage accidents and 2) other accidents.

4.1 Handling and Storage Accidents

Handling and storage accidents include drops, collisions, and system failures.

The potential for drop accidents is minimal due to the operating and design features which are incorporated in the crane design. Lifting cables and lugs are designed with a minimun safety factor of 2. In addition, container lifting devices are designed to remain engaged until an operator initiates an electrical or mechancial force to release them. The control switches which activate and deactivate the lifting devices are totally segregated from those that position the trolley and crane, thus reducing the possibility for operator error.

The lifting devices are also designed to remain engaged until the downward force is completely removed by resting the load on a floor surface. In addition, lifting heights, travel times and distances will be minimized to further reduce the possibility of a drop accident.

Overhead crane and transport vehicle collisions are not anticipated to occur due to their slow travel speed and the facility design. In the LLRWMF, the transport vehicle moves no faster than 10 miles per hour and the overhead crane no faster than 50 feet per minute. A transport vehicle collision with a storage vault is possible, but due to vehicle speed and vault design, has no impact on the storage containers' structural integrity or the shielding capabilities of the vault wall.

System failures, though not anticipated, would not impair the overall integrity of this facility. Failure of normally operating systems, such as lighting, ventilation, or electrical would not affect the facilities' safe storage function.

Should a shield panel or cell cover become damaged for any reason , spare panels and covers will be available onsite.

4.1.1 Container Drop from a Transport Vehicle

The LLRW storage containers are transferred from the plant to the storage facility on a truck. Solidified waste containers are shielded with a portable shield bell while being transferred from the solidification facility to the storage facility. Should a waste container fall to the ground and be damaged due to a postulated transport vehicle collision or upset, the waste would not create an airborne radiation hazard because it is solidified. However it is possible that the container shielding would be damaged or inadequate to fully shield the direct radiation from the container. The design basis direct radiation dose from the solidified waste to the nearest offsite location is calculated to be 1.6 mrem. which is well within the limits of 10 CFR 100. The radiation sources and assumptions used for this calculation are given in Table 4.1-1.

This analysis is based on a solidified waste container with a design radiation dose of 60 rem/hr contact. Infrequently, contaminated equipment and waste containers with dose rates higher than 60 rem/hr may be transferred to, and temporarily stored in the LLRWF. Special procedures and administrative controls will be used in these cases. The dose calculation results given in Table 4.1-1 show that waste containers with radiation levels many times higher than 60 rem/hr would still be well within the limits of 10 CFR 100.

4.1.2 Dropping a Cell Cover into a Storage Cell

The cell covers are designed with a shielding offset such that each individual cell cover has a larger diameter than that of its cell opening, which prevents the cover from dropping into the cell. However, the cell covers and shield panels are not designed to sustain a cell cover drop from the maximum lifting height. Therefore, a cell cover dropped from its eight inch maxium lifting height could drop into a loaded cell, damaging the LLRW containers inside.

Since the waste is solidified this accident would not create any radiation hazard to unrestricted areas. The damaged containers would remain in the cell and be covered with a spare cover until the required decontamination, repair and/or repackaging could be accomplished.

4.1.3 Dropping a Heavy Component onto a Shield Panel

The shield panels covering the storage vaults are not designed to withstand the drop impact of a cell cover, LLRW container or another shield panel. However, the storage vaults are designed such that the supporting steel frame members are not affected by damage to, or failure of, one or more of the vaults shield panels. Therfore, although the panel and stored waste containers could be damaged by a heavy component drop, the structural integrity of the cell and the remaining facility would not be compromised. Since the waste is solidified, this postulated accident would not create an airborne radiation hazard offsite. However, damage to the shield panels could cause a skyshine radiation hazard off-site.

Assuming two fully loaded storage vaults and no shielding provided by the damaged panels, the skyshine radiation dose rate offsite is 0.1 mrem/hr.

The sources and assumptions used in this evaluation are given in Table 4.1-2.

If this accident were to occur, the damaged containers would be covered by a spare shield panel and remain in the storage vault until the required decontamination, repair and/or re-packaging could be completed. The total dose for the accident duration would be well within 10 CFR 100 limits.

4.1.4 Collision of the Overhead Crane or Transport Vehicle with a Storage Container

A collision of the overhead crane or transport vehicle with a storage container is improbable due to their slow travel speeds discussed in 4.1. Also, a transport vehicle (fork-lift) collision with a solidified waste container is not possible because only the overhead crane is to be used in the storage vault area.

A collision of 1) the crane hook with a solidified waste container, or 2) the crane hook or transport vehicle with the trash containers, would cause only minor abrasive damage. If the trash containers were breached or their lids were dislodged, no waste would leave the facility's confines until the required decontamination and/or repackaging was completed. Therefore, there would be no offsite radiological consequences due to this accident.

4.1.5 Dropping a LLRW Container into a Cell

During storage cell loading operations, it is possible that a waste container could be dropped into a partially loaded cell and damage the container and the storage cell contents. Since all waste stored in the cells is solidified, there would be no airborne radiation hazard to unrestricted areas. The damaged waste containers would remain shielded in the cell until the required decontamination, repair and/or repackaging could be accomplished. Therefore, no offsite radiological consequences would result from this accident.

4.1.6 Collision Between the Transport Vehicle and the Overhead Crane

A collision between the transport vehicle and crane is unlikely because both machines are not in motion simultaneously. Also, the crane bridge support wheels are kept from the transport vehicle by a large vertical separation and a track wheel stop which prevents the crane from overriding its track and colliding with the transport vehicle.

4.2 Other Accidents

Other accidents include fires, freezes, tornadoes, floods, earthquakes and sabotage.

4.2.1 Fires

A fire in the LLRWHF is extremely unlikely because all flammable material is stored inside metal containers. Also, the facility is equipped with a fire detection/protection system described in 2.3. Therefore, a fire inside the facility resulting in offsite dose consequences or appreciable damage to the LLRWHF and its contents is not considered to be probable. However, to demonstrate that there are no adverse offsite radiological consequences, an accidental release due to an unspecified incendiary event has been conservatively evaluated assuming 100% of the facility's stored trash is affected by a fire. No credit was taken for the mitigating effects of the fire protection system. The resulting offsite dose is 0.2 mrem. The sources and assumptions used in this evaluation are given in Table 4.2-1. This dose is well within the limits of 10 CFR 100.

4.2.2 Freezes

The breech of a container due to water crystallization expansion of its contents is not possible because all stored waste will be solidified and contain less than 0.5 percent free-standing water by waste container volume.

4.2.3 Tornadoes

As described in 2.10, the facility's trash restraining system is designed to prevent any trash containers from being blown out of the facility confines during a tornado with up to a 300 mile per hour wind velocity. Therefore, there would be no offsite radiological consequences due to tornado damage to this facility.

4.2.4 Floods and Seismic Events

The LLRWHF is designed for the maximum plant design rainfall intensity of 6 inches per hour. The facility does not have other special flood provisions because it is well above the Susquehanna River flood stage for the probable maximum flood.

The LLRWHF is a Non-Category I structure. Failure of this structure during a seismic event would not result in the release of significant radioactivity nor affect safe reactor shutdown.

4.2.5 Sabotage

Damage to the LLRWHF and its contents due to sabotage is highly improbable because of the inherently safe design and security system employed. Also, the stored wastes are inert and low in radioactivity making them an unlikely sabotage target. Since the facility is within the site's secured area and is equipped with magnetic card entry, no accidents beyond those already considered are evaluated specifically for sabotage.

4.3 Summary

The LLRWHF, and its associated storage containers, equipment and operating procedures provide a satisfactory interim storage facility which is capable of controlling and mitigating the radiological consequences of potential accidents and unplanned events.

5.0 REFERENCES

5.1 "Environmental Assessment of the Operation of On-site Low-level Radioactive Waste Holding Facility (Interim Storage) at Susquehanna Steam Electric Station, June 1981.

5.2 "A Waste Inventory Report for Reactor and Fuel-Fabrication Facility Wastes" ONWI-20 NUS-3314, USDOE, March 1979.

5.3 "Environmental Survey of Transportation of Radioactive Materials To and From Nuclear Power Plants," WASH-1238, December 1972.

6.0 TABLES

TABLE 4.1-1

DESIGN BASIS SOURCES AND ASSUMPTIONS USED TO CALCULATE THE OFF-SITE RADIOLOGICAL CONSEQUENCES DUE TO A CONTAINER DROP FROM A TRANSPORT VEHICLE

A. Radiation Source

A design radiation level of 60 rem/hr contact is assumed for the solidifed waste container and is based on a solidified reactor water clean-up spent resin activity distribution. The source for the reactor water clean-up spent resin is given in Section 12.2 of the Susquehanna SES FSAR.

B. Geometry of the Dropped Container

The geometry of the dropped container is based on a Chem-Nuclear Container 6-80.

Diameter - 58"
Height - 57-7/8"
Volume - 85 cu.ft.

C. Distance from the Source to Receiver Point

Distance from the drop point (immediately adjacent to the facility) to the site boundary - 1308. ft.

TABLE 4.1-1 (Cont'd)

D. Duration of Accident

Total time the container is assumed to remain unshielded - 8 hrs.

E. Off-Site Radiological Consequences

Off-site Dose Rate	- 0.2 mrem/hr
Total Integrated Off-Site Dose	- 1.6 mrem/hr

TABLE 4.1-2

DESIGN BASIS SOURCES AND ASSUMPTIONS USED TO CALCULATE THE OFF-SITE RADIOLOGICAL CONSEQUENCES DUE TO DROPPING A HEAVY COMPONENT ONTO A SHIELD PANEL

A. Skyshine Radiation Source

Forty percent of the source is based on a solidified Reactor Water Clean-up Spent Resin activity distribution normalized to a 60 rem/hr contact container dose rate.

Sixty percent of the source is based on a solidified Condensate Demineralizer Spent Resin activity distribution normalized to a 3 rem/hr contact container dose rate.

Source terms for these spent resins are given in Section 12.2 of the Susquehanna SES FSAR.

B. Skyshine Source Geometry

The total activity contained by two vaults assuming maximum capacity is used to determine an equivalent point source. No credit is taken for shielding provided by the damaged panels.

C. Distance from the Source to the Receiver Point

Distance from the facility to the site boundary = 1308. ft.

D. Off-Site Radiological Consequences

Off-site dose rate = 0.1 mrem/hr

TABLE 4.2-1

DESIGN BASIS SOURCES AND ASSUMPTIONS USED TO CALCULATE THE OFF-SITE RADIOLOGICAL CONSEQUENCES DUE TO A FIRE IN THE LLRW COMPACTED TRASH

A. Isotope Inventory of Compacted Trash (Ref. 5.2)

ISOTOPE	ACTIVITY (Ci/drum)
Mn-54	1.1 -3
Co-58	1.0 -4
Co-60	2.2 -3
Cs-134	3.0 -4
Cs-137	5.9 -4

B. Number of Drums Affected by the Fire

Number of drums assumed to catch fire - 14,100

(This is the 4 year compacted trash capacity of the LLRWHF).

C. Meteorology

X/Q - 1.3-3 sec/cu.m.

D. Airborne Radiation

Percent of Particulate Contamination
Assumed to be Airborne (Ref 5.3) - 1%

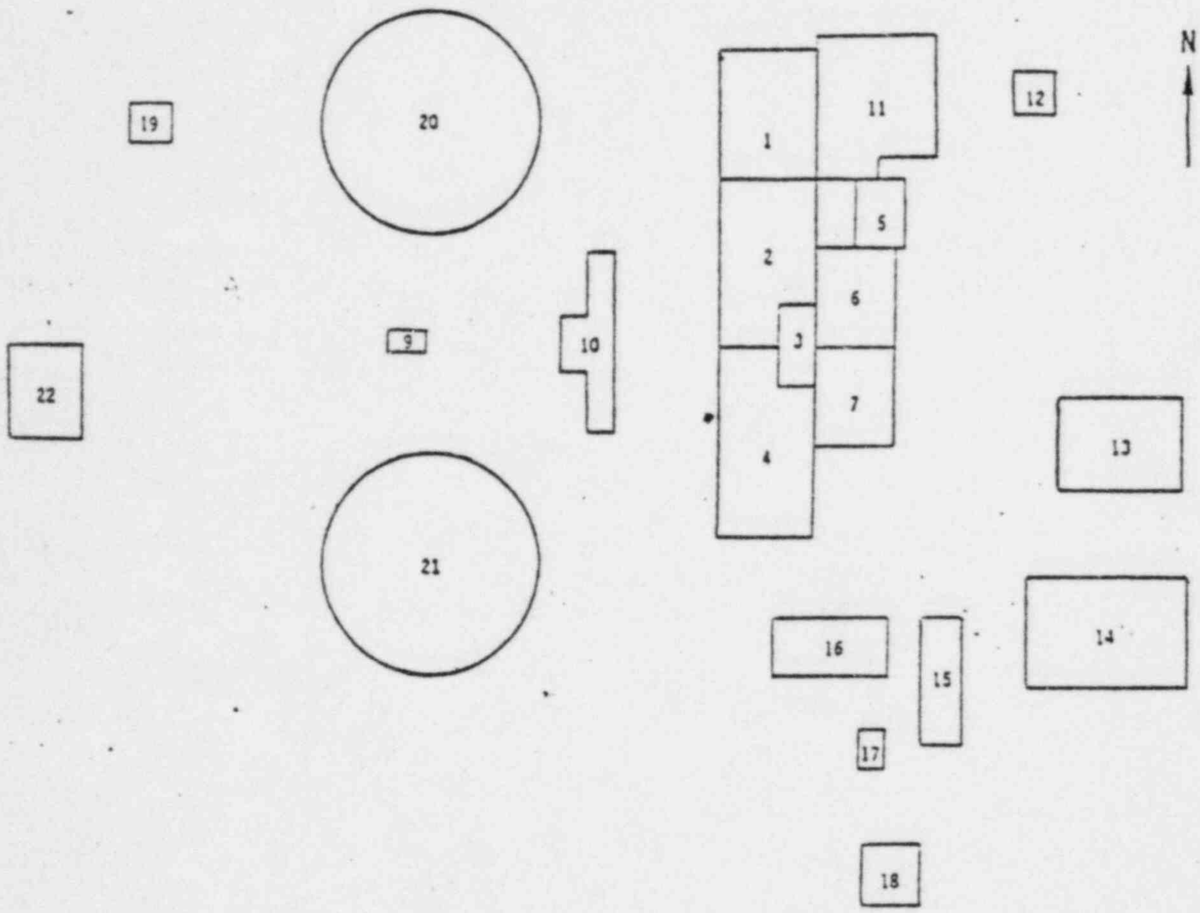
E. Off-site Radiological Consequences

Total Integrated Off-Site Dose (Whole Body Gamma) - 0.21 mrem

7.0 FIGURES

FIGURE 2.0-1

OVERHEAD VIEW OF THE SUSQUEHANNA STEAM ELECTRIC STATION

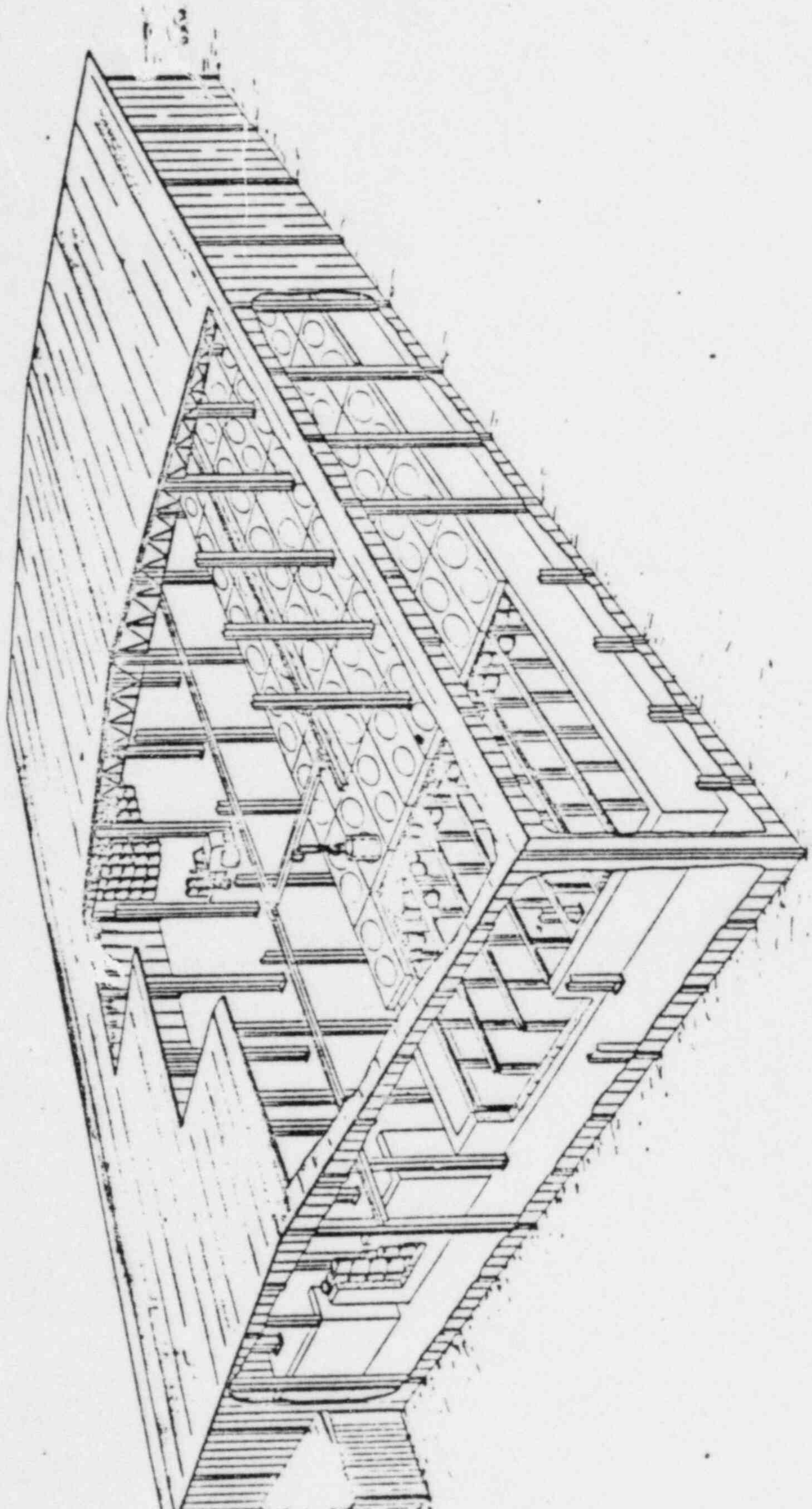


Key

1-Rad Waste Building
2-Unit 1 Turbine Building
3-Control Structure
4-Unit 2 Turbine Building
5-Diesel Generator Building
6-Unit 1 Reactor Building
7-Unit 2 Reactor Building
8-Engineered Safeguards and Service Water Pump House
9-Acid Storage Building
10-Pump House
11-Service and Administration Building
12-North Gate House
13-Combination Shop
14-Warehouse
15-Change House
16-Project Office
17-Welding Shop
18-South Gate House
19-Security Control Center
20-Unit 1 Cooling Tower
21-Unit 2 Cooling Tower
22-LLRWHF

FIGURE 2.0-2

ARTIST'S CONCEPTUAL DRAWING OF THE
LOW-LEVEL RADIOACVTIVE WASTE HOLDING FACILITY



advance PDR to be filed with 50-387/388

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UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NO. 30-19311

PENNSYLVANIA POWER AND LIGHT COMPANY AND

ALLEGHENY ELECTRIC COOPERATIVE, INC.

(SUSQUEHANNA STEAM ELECTRIC STATION);

RECEIPT AND AVAILABILITY OF APPLICATION FOR LICENSE

LOW-LEVEL RADIOACTIVE WASTE HOLDING FACILITY

Pennsylvania Power and Light Company and Allegheny Electric Cooperative, Inc. (PP&L) currently hold USNRC Construction Permits, Nos. CPPR-101 and CPPR-102, for construction of two 1050 MWe General Electric boiling water nuclear power reactors for PP&L's Susquehanna Steam Electric Station (SSES) located in Luzerne County, Pennsylvania. PP&L is currently seeking Operating Licenses for the two reactors.

On August 14, 1981, the Commission received an application from PP&L for a by-product material license authorizing the storage of low-level radioactive wastes generated from operation of the SSES in an onsite Low-Level Radioactive Waste Holding Facility. If granted, the license would authorize PP&L to store, on a contingency basis, dry active waste and dewatered, solidified (cement) waste for up to four years per reactor.

The application is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C. and at the Local Public Document Room maintained at the Osterhout Free Library in Wilkes-Barre, Pennsylvania. The application is filed in the Dockets for the Reactor Operating Licenses, Nos. 50-387 and 50-388.

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