Docket No. 50-423
B17276

Attachment 2

Millstone Nuclear Power Station, Unit No. 3
Proposed License Amendment Request
SLCRS Bypass Leakage
(PLAR 3-98-5)
Marked Up Pages

June 1998

MARKUP OF PROPOSED REVISION

Refer to the attached markup of the proposed revision to the Final Safety Analysis Report (FSAR). The attached markup reflects the currently issued version of the FSAR.

The following FSAR changes are included in the attached markup.

- FSAR Section 6.4 - revised to include a description of the manual actions required to trip the NNS fans and time requirements for control room ventilation realignment

- FSAR Section 9.4.1 - revised to include a description of the manual actions required to trip the NNS fans and time requirements for control room ventilation realignment

- FSAR Section 15 - revised to include the inputs assumptions and results of the new LOCA/Control Rod Ejection accidents

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Outdoor air is supplied to the control room envelope at a CONSTANT rate of 1,450 cfm ~~and is held constant~~ during normal plant operation. Mechanical exhaust is provided from the control room toilet and kitchenette exhaust fan at a rate of 595 cfm. Thus, a positive pressure is maintained during normal operation.

When the control room must be isolated in an emergency (LOCA or high radiation alarm from intake monitors) or by manual actuation, the outdoor air and the exhaust air isolation butterfly valves close. The air-conditioning units serving the control room envelope continue operating without outdoor air to maintain required humidity and temperature. Following a Control Building Isolation (CBI), the control room pressure envelope is pressurized from one of two banks of air storage tanks to 1/8 inch water gage pressure differential. Although the differential pressure may fluctuate, the control room pressure envelope maintains a positive pressure relative to surrounding area. After one hour, the isolation valves can be opened to divert outside air through the control room emergency ventilation filter. Insert A In the event that inlet isolation valves fail to open, operators are able to manually open these valves using the manual jack screw operator. Since the location of these valves is within the control room habitability zone and the valves are designed for manual manipulation, control room personnel are able to open these valves within one hour AND FORTY MINUTES following control room isolation.

(97-355 8/97)
(97-360 8/97)
(94-30 12/94)

The pressurization system for the control building envelope has two banks of air tanks with its associated piping, instrumentation, and controls. Each bank is of 100-percent capacity and in case of failure of one bank, the other redundant bank starts automatically.

The calculated ventilation filter flow rate is 1,225 cfm (clean) and 1,000 cfm (dirty). The actual flow rate is in accordance with performance testing requirements which ensures that filter flow rates are maintained within an acceptable tolerance of design flow. The recirculation air rate from the control room to either filter return can be varied between 0 to 915 cfm. (96-55 1/97)

Redundant Seismic Category I radiation monitors are located at the outdoor air intake. If high radiation is detected in the intake air stream, the CBIVs are automatically closed. A smoke detector is also provided at the air intake and, if smoke is detected, the alarm is annunciated in the control room for operator action. The radiation monitor high alarm setting is discussed in the Technical Specifications. (97-354 9/97)

A 1-hour air supply is provided from the control room area pressurizing air storage tanks. (94-22 10/94)

6.4.4 Design Evaluation

The control room air-conditioning system maintains a suitable environment for personnel and equipment during normal and emergency conditions. Components of the air-conditioning and chilled water systems are designed to Category I criteria and are enclosed in a Category I control building with the exception of the air conditioning unit electric heaters which are Seismic Category II. Electric heat is not required during design basis events.

All intake and exhaust openings are tornado missile protected. Outside air is not used for the first hour after an accident. Outdoor air is filtered by one of the emergency ventilation filter assemblies.

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After one hour, realignment of the control room ventilation system from the pressurization mode to the filtration/recirculation mode of operation can be initiated. In the event of a LOCA, ~~prior to opening the inlet isolation valves,~~ OCE 5/21/98 operator action is credited to secure selected Main Steam Valve House, Auxiliary Building and Emergency Safeguards Features Building exhaust fans, specifically fans 3HVV-FN1A&1B, 3HVR-FN5&7 and 3HVQ-FN2 are secured. This action is completed within 20 minutes during which time the control room will depressurize to ambient pressure. The isolation valves are ~~then~~ opened, to divert outside air through the control room emergency ventilation filter. oce 5/21/98

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7. Each battery room has an independent exhaust fan and associated ductwork. Air to these areas is drawn in from adjacent switchgear areas through louvers, filters, and grills. To make up for the battery room exhaust and to provide ventilation air in the switchgear areas, independent supply ducts with an axial fan rated at 1500 cfm, electric heating coils, and prefilters are provided.

The control room emergency ventilation filtration and pressurization system consists of redundant pressurization air storage tanks and two redundant emergency air filtration units. The air pressurization system operates during the first hour of an accident. After 1 hour, outdoor air can be introduced into the system through the emergency ventilation filtration unit.

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Each of the air-conditioning units is supplied with chilled water by the control building chilled water system. The control building chilled water system is redundant and consists of two 100 percent capacity water chillers, two 100 percent capacity chilled water pumps, and two expansion tanks. Each chiller is rated at 250 tons of refrigeration. Each chilled water pump is rated at 450 gpm. The chilled water piping is arranged in two redundant flowpaths to serve the control building air-conditioning unit cooling coils.

Each air-conditioning unit cooling coil has a flow control valve controlled by a thermostat in the respective area. The differential pressure control valve automatically maintains constant return flow to the chilled water pump by modulating bypass flow in proportion to varying air-conditioning system flow.

All Category I electrically-powered motors and controls associated with the control building air-conditioning and ventilation systems and the chilled water systems are redundant to ensure operability of the control building air-conditioning and ventilation as a result of a single failure of any component. In the event of a loss of power under either normal operating or accident conditions, emergency power is supplied from either the preferred offsite source or the emergency diesel generators.

All outside air supply and exhaust ducts for the control room pressure envelope air-conditioning system, kitchen-toilet exhaust system, and purge system are fitted with air-operated butterfly valves located as close as possible to the control building wall.

The control building is heated electrically. Area thermostats activate heating elements in the control room air-conditioning units to maintain a minimum design temperature. A control switch activates heating elements in the instrument rack and computer room air-conditioning units in the event heating is required. The mechanical equipment space is heated with electric unit heaters that are controlled separately from thermostats located in the room. The chiller equipment space is heated with electric duct heaters and electric unit heaters that are controlled separately from thermostats. Electric heaters are not required to function following loss of offsite power.

The control building purge ventilation system removes smoke or carbon dioxide from the instrument rack and computer room, the cable spreading area, switchgear rooms, and the mechanical equipment room (zoned with the control room) through administrative controls. The system is designed to permit the operator to purge each space containing smoke or carbon dioxide by opening the supply and exhaust purge isolation dampers from outside that space.

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After one hour, realignment of the control room ventilation system from the pressurization mode to the filtration/recirculation mode of operation can be initiated. In the event of a LOCA, ~~prior to opening the inlet isolation valves,~~ QO2 5/27/98 operator action is credited to secure selected Main Steam Valve House, Auxiliary Building and Emergency Safeguards Features Building exhaust fans, specifically fans 3HVV-FN1A&1B, 3HVR-FN5&7 and 3HVQ-FN2 are secured. This action is completed within 20 minutes during which time the control room will depressurize to ambient pressure. The isolation valves are ~~then~~ QOE 5/27/98 opened, to divert outside air through the control room emergency ventilation filter. In the event that the inlet isolation valves fail to open, operators are able to open these valves ^ one hour and 40 minutes following a CBI.

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9.4.1.3 Safety Evaluation

The control building air-conditioning, emergency ventilation filtration, and chilled water systems are Seismic Category I and QA Category I. Ventilation, except for the kitchen-toilet exhaust and the purge system, are Seismic Category I and QA Category I. All of the systems are enclosed in a Category I missile- and tornado-protected building.

The control building habitability envelope air bottle pressurization system is designed to ASME B and PV Code Section VIII, Division 1 and ANSI B31.1 standards. The air pressurization system is designed to Seismic Category I requirements.

A radiation monitor connected with the makeup air duct of the control room area air-conditioning units detects and respond to the presence of radioactivity. At the discretion of the operator, the emergency ventilation system can be started manually and the return air of the control room or the outdoor air supply diverted through the emergency ventilation filtration assembly.

High radiation detected by the monitors located in the air intakes result in control building isolation (Section 6.4). (95-59 12/95)

During control building isolation, the air bottle pressurization subsystem supplies breathable air and maintains a positive pressure within the control room envelope. The air is discharged to the 64'6" elevation, from where the balanced control room air conditioning units maintain equal pressure between the two elevations of the envelope. The air intake isolation valves can be opened and emergency ventilation started following 1 hour of air bottle pressurization. These valves and emergency ventilation filter fans are manually operated from the main ventilation panel in the control room. The valves are located within the habitability zone and can be opened, in the event either valve fails to open by manual activation, with a rack screw operation. This design enables these valves to be opened within 1 hour following control room isolation. (96-27 7/96) — Insert C

The storage bottles are normally refilled via breathing air quality compressors. These are located in the turbine building. Additionally, a fill connection is located on the outside wall of the turbine building. Refilling is usually accomplished using breathing air quality air compressors. Alternately an air tank truck can be on site within 3 days for refilling purposes. 97-503 1/98

Fusible link fire dampers are provided on openings in fire barriers separating fire areas. The dampers automatically isolate the area affected by fire. Fire damper assemblies installed in ventilation ductwork common to redundant portions of this system consist of at least two fire dampers in parallel in order to preclude a single failure of one fire damper from impairing the safety function of the system. Administrative controls to shut down control room air-conditioning units in the event of a fire detection alarm within the control room envelope are used to ensure fire damper closure if a fire exists. Airtight doors, sealed penetrations and fire walls prevent smoke, heat, and carbon dioxide from entering the control room. A purge system is provided to remove smoke and carbon dioxide from all areas except the chiller room which has 100 percent outside air circulation. The purge system shares a common air intake duct, but is operated completely independent of all control building air-conditioning and ventilation systems. The largest area served by the purge system can be ventilated at a rate of approximately one air change per hour. (97-329 8/97)

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After one hour, realignment of the control room ventilation system from the pressurization mode to the filtration/recirculation mode of operation can be initiated. In the event of a LOCA, ~~prior to opening the inlet isolation valves, which along with the emergency filter fans are manually operated from the main ventilation panel in the control room,~~ operator action is credited to secure selected Main Steam Valve House, Auxiliary Building and Emergency Safeguards Features Building exhaust fans, specifically fans 3HVV-FN1A&1B, 3HVR-FN5&7 and 3HVQ-FN2 are secured. This action is completed within 20 minutes during which time the control room will depressurize to ambient pressure. The isolation valves are ~~then~~ opened, to divert outside air through the control room emergency ventilation filter. ~~within one hour and twenty minutes following a CBI.~~

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In the event the inlet isolation valves fail to open, operators are able to manually open these valves using the manual jack screw operator. Since the location of these valves is within the control room habitability zone and the valves are designed for manual manipulation, control room personnel are able to open these valves within one hour and forty minutes following control room isolation.

The air intake isolation valves and the emergency ventilation filter fans are manually operated from the main ventilation panel in the control room.

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In normal operation, the chilled water pumps are not affected by a CBI signal. The CBI signal prevents the running pump from being manually stopped from the control room.

The chillers are provided with ON-STOP chiller safety circuit push buttons and START-STOP pushbuttons for local manual control. The chiller safety circuit is normally ON for both chillers. The chillers are started automatically when the associated chilled water pump is started.

Control room air-conditioning unit heaters are controlled by automatic temperature controllers. Instrument rack and computer room air-conditioning units are controlled by temperature switches in the event heating is required.

The control room pressure envelope area is automatically isolated from the outside atmosphere upon receipt of a CBI signal, and 60 seconds after a CBI signal is initiated, the control room is automatically pressurized with air from the control room pressurizing air storage tanks. These air tanks have a 1-hour supply of air. After this time, an emergency ventilation filtration train can be manually started to maintain pressurization of the control room. — Insert D

A CBI signal is initiated when any of the following conditions exist:

- air-intake radiation high;
- containment pressure high 2 out of 3 signal;
- manual initiation from main control board;
- (95-59 12/95) manual initiation from main heating and ventilation; or
- manual safety injection signal.

The control building ventilation makeup dampers and the control building isolation valves have control switches and indicator lights on the main heating and ventilation panel. Engineered safety features status lights on the main control board indicate when the valves and dampers are closed. The opened and closed positions are monitored by the plant computer. The control building air makeup dampers and isolation valves are automatically closed on receipt of a CBI signal.

Control switches and valve position indicator lights are provided for the air storage tanks' outlet valves on the main heating and ventilation panel. Engineered safety features status lights on the main control board indicate when the valves are open, and the open and closed positions are monitored by the plant computer. The air storage tanks' outlet valves are opened automatically after a time delay on receipt of a CBI signal.

The chiller equipment space supply fans have control switches and indicator lights on the main heating and ventilation panel. The exhaust fans are interlocked to start and stop with the associated supply fan. One train is normally running with the other train on standby.

The purge supply fan is interlocked with the purge supply damper. The supply fan is started when the supply damper is opened and stopped when the damper is closed. The

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realignment of the control room ventilation system from the pressurization mode to the filtration/recirculation mode of operation can be initiated as described in section 9.4.1.3.

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(92-22) 6/92) gap activities to the reactor coolant. The gap activity is assumed to be released instantaneously into the containment atmosphere via the break in the reactor vessel head. In addition, it is further postulated that 0.25 percent of the core fuel experiences melting resulting in 100 percent of the noble gases and 25 percent of iodines in the fraction of melted fuel to be available for release from the containment. The releases to the environment are assumed to take place from the secondary system until such time that the secondary system pressure decreases below relief valve actuation. The containment building releases are assumed to last for 30 days after initiation of the accident. Activity released from the secondary system is derived from the technical specification primary to secondary leakage of reactor coolant containing activity associated with technical specification fuel defects, releases from fuel with clad damage, and 100 percent of the noble gases and 50 percent of the iodine contained in this fraction of fuel assumed to have melted. Releases from the secondary side are evaluated assuming coincident loss of offsite power. Pertinent parameters used to describe the ~~secondary side~~ releases are presented in Tables 15.4-4 ~~and~~, 15.4-6 and 15.6.9 (21-27).

A SIS signal is generated within 1 minute following the accident which initiates secondary containment.

97-426 3/98 (92-22) Assumptions regarding the time for the secondary containment to achieve negative pressure are the same as that which was used for the LOCA analysis. The bypass leakage is released unfiltered to the environment at ground level. The leakage which is not bypass leakage is assumed to be processed by the secondary containment filtration system. A more detailed description of containment leakage is found in 15.6.5.4.

(92-22) For purposes of conservatism, all collected leakage is assumed to exhaust via a release point located above the turbine building. This assumption is made as a result of the simultaneous operation of the charging pump ventilation supply and exhaust system which may entrap and filter some fraction of containment leakage as described in Section 9.4.3. This effluent is analyzed as a ground level release. Delete

97-426 92-22) The releases, together with the atmospheric dispersion factors listed in Table 15.0-11, are used to compute the doses to the EAB (0-2 hr) and LPZ (0-30 days).

The radiological consequences of a postulated rod ejection accident are analyzed (for both N-loop and N-1 loop operation) with the information contained in Regulatory Guide 1.77 and the Standard Review Plan 15.4.8. For the N-1 loop analysis, it is assumed that the plant had been in N-loop operation at full power sufficiently long to achieve equilibrium core activities and coolant concentrations. The plant then began N-1 loop operation, shortly after which the rod ejection accident occurred. The calculated dose results (for both the N-loop and the N-1 loop analyses) described in Table 15.0-8 for the rod ejection accident are presented separately for the releases from the containment building and the releases via the secondary system.

(92-22) The radiological consequences of the postulated rod ejection accident are within the guidelines of 10CFR100; i.e., 75 Rem to the thyroid and 6 Rem to the whole body.

15.4.9 References for Section 15.4

Bishop, A. A.; Sandburg, R. O.; and Tong, L. S., 1965. Forced Convection Heat Transfer at High Pressure After the Critical Heat Flux. ASME 65-HT-31.

Liimataninen, R. C. and Testa, F. J. 1966. Studies in TREAT of Zircaloy-2-Clad, UO_2 Core Simulated Fuel Elements. ANL-7225, January - June 1966, p. 177.

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97-426 3/98 (92-22 6/92) filtered air into the control room. During this 40 minute period, 230 cfm unfiltered inleakage is assumed. Delete During ^ this 40 minute period and the period of pressurization, 115 cfm of unfiltered inleakage is assumed.

Release Pathways

The release pathways to the environment subsequent to a loss-of-coolant DBA are leakages from the containment building and ESF systems, which are collected and processed, and leakage from the containment building which is assumed to bypass SLCRS.

Containment Leakage Pathway

(92-22 6/92) The containment is assumed to leak at the design leak rate for 24 hours after the accident. After 24 hours, since the pressure has been decreased significantly, Regulatory Guide 1.4 allows the containment leakage to be reduced to one-half the design leak rate. For the dose calculations to the Control Room and Technical Support Center, a reduced containment leak rate was assumed at T = 1 hour. (96-34 6/96) This was justified and approved as part of the Amendment that eliminated the post-LOCA negative pressure containment requirement. It is based on the fact that the Millstone Unit 3 containment pressure is rapidly reduced compared to typical PWRs because of its original design as a negative pressure containment.

The collection, processing, and release of containment leakage varies depending on the location of the leak. Ventilation characteristics and release paths are different for each building comprising the secondary containment.

(92-22) Two emergency ventilation systems collect most of the containment leakage and process it through HEPA and charcoal filters. The SLCRS exhausts from the containment enclosure, auxiliary, ESF, and the main steam valve buildings, and the compartment of the hydrogen recombiner building abutting the containment. SLCRS flow is filtered and released through the Unit 1 stack. The charging pump, component cooling water pump, and heat exchanger area portion of the auxiliary building ventilation system (ABVS), described in Section 9.4.3, supplies and exhausts a relatively high flow on the 24 foot-6 inch elevation floor of the auxiliary building. The exhaust flow is filtered and released through the ventilation vent on the roof of the turbine building.

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97-426 The specific areas of the secondary containment into which the primary containment will leak cannot be predicted. Some areas would be released primarily through the filters to the MP3 ventilation vent. Other areas may have some bypass leakage paths, but the majority of the activity would go through filters to the elevated MP1 stack. An analysis was performed to determine the worst case location for assumed containment leakage. It was determined that the assumption that all containment leakage is into the 24' level of the auxiliary building and is released instantaneously (no mixing) through filters to the lower ventilation vent release point bounds any more mechanistic analysis which would include mixing, some bypass and elevated releases. Delete

(92-22) Credit is taken for iodine removal due to containment sprays during the duration of the accident. Assumptions pertaining to the spray system are listed in Table 15.6-9.

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All containment leakage is collected and filtered by these 2 ventilation systems except for the following:

1. The fraction of containment leakage which is assumed to bypass the secondary containment. This is assumed to be an unfiltered ground level release to the environment.
2. The initial containment leakage during the 2 minute time period required for SLCRS to establish negative pressure conditions. This is assumed to be an unfiltered ground level release to the environment.
3. The leakage past closed dampers which isolate non-ESF ventilation systems in the auxiliary, ESF and main steam valve building. This leakage is assumed to be an unfiltered ground level release to the environment. For Control Room habitability, the analysis assumes the main steam valve, auxiliary and ESF building normal exhaust portions are secured prior to placing the control room on ~~emergency~~ v~~entilation~~. For TSC habitability, the main steam valve and auxiliary building normal exhaust portions trip upon receipt of a SIS signal. The ESF normal exhaust is secured locally prior to 1 hour 20 minutes post LOCA.
4. The ductwork leakage from the auxiliary building into the SLCRS and emergency portion of the ABVS between the filter and the exhaust fan. This leakage is released unfiltered, along with the rest of the flow for these systems, through the Unit 1 stack for the SLCRS flow and through the ventilation vent for the ABVS flow.

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Filtered intake / recirculation
Pressurization MODE.

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TABLE 15.0-8

POTENTIAL OFFSITE DOSES DUE TO ACCIDENTS

Postulated Accident	FSAR Section	Dose (rem) 2 hr Exclusion Area Boundary (524 m)		Dose (rem) Low Population Zone (3862 m)	
		Thyroid	Gamma	Thyroid	Gamma
Steam Generator Tube Rupture	15.6.3				
a. Preaccident iodine spike		2.1E+00	1.9E-02	2.4E-01	1.2E-03
b. Concurrent iodine spike		3.4E-01	1.8E-02	7.6E-02	1.1E-03
LOCA	15.6.5	1.4E+02$^{(5)}$	9.4E+00$^{(5)}$	3.0E+01$^{(5)}$	1.7E+00$^{(5)}$
Waste Gas System Failure	15.7.1	0.0E+00	2.2E-01	(2)	(2)
Radioactive Liquid Waste System Leak or Failure (Atmospheric Release)	15.7.2	4.3E-01	4.7E-04	(2)	(2)
Fuel Handling Accident	15.7.4	7.6E+00	5.1E-01	(2)	(2)
Spent Fuel Cask Drop	15.7.5	(3)	(3)	(3)	(3)

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NOTES:

(1) 1.6E-01 = 1.6 x 10^{-1}

(2) 2 hours of release or less; a 30-day dose is not applicable.

(3) Not applicable—see Sections 15.7.5.2 and 15.7.5.3.

(4) The current rod ejection analysis result in an EAB thyroid dose of ~~9.5E+00~~ 1.0E+01, an EAB gamma dose of ~~1.3E-01~~ 1.0E-01, an ~~LPZ~~ LPZ thyroid dose of ~~4.0E+00~~ 1.03E+01 ~~1.05E+01~~ and an ~~LPZ~~ LPZ gamma dose ~~of 2.0~~ 4.0 ~~4.4~~E-02. The current results are bounded by the licensed numbers listed in the table.

(5) The current LOCA analysis result in an EAB thyroid dose of ~~1.0E+02~~ 5.8E+01 ~~8.8E+01~~, an EAB gamma dose of ~~8.2E+00~~ 5.3E+00, an ~~LPZ~~ LPZ thyroid dose of ~~9.6E+00~~ 2.2E+01 ~~9.1E+00~~ and an ~~LPZ~~ LPZ gamma dose of 1.3E+00. The current results are bounded by the licensed numbers listed in the table.

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TABLE 15.0-11

ATMOSPHERIC DISPERSION DATA USED FOR DESIGN BASIS ACCIDENT ANALYSIS

EAB X/Qs (sec m^{-3})	
Ground level release-containment 0-2 hr.	$5.4_{\wedge}^{2} \times 10^{-4}$
Ground level release-ventilation vent 0-2 hr.	~~4.3 x 10^-4~~ 1.0×10^{-4}
Elevated release-Unit 1 Stack 0-2 hr.	7.0×10^{-6}
LPZ X/Qs (sec m^{-3})	
Ground level release-containment 0-8 hr.	$2.9_{\wedge}^{1} \times 10^{-5}$
Ground level release-ventilation vent	
0-8 hr.	$2.9_{\wedge}^{1} \times 10^{-5}$
8-24 hr.	1.99 ~~2.0~~ $\times 10^{-5}$
1-4 days	8.66 ~~8.7~~ $\times 10^{-6}$
4-30 days	$2.6_{\wedge}^{3} \times 10^{-6}$
0-4hr. → Elevated release-Unit 1 stack	2.69×10^{-5}
(4) → ~~0~~-8 hr.	~~3.30 x 10^-6~~ 1.07×10^{-5}
8-24 hr.	~~2.30 x 10^-6~~ 6.72×10^{-6}
1-4 days	~~1.05 x 10^-6~~ 2.46×10^{-6}
4-30 days	~~3.39 x 10^-7~~ 5.83×10^{-7}

Control room X/Qs(4) (sec m^{-3})	Millstone 1	Millstone 2	Millstone 3
a. Ground level release-containment			
0-8 hr.	1.9×10^{-3}	1.4×10^{-3}	1.52×10^{-3} ~~8.08 x 10^-4~~
8-24 hr.	1.3×10^{-3}	9.7×10^{-4}	8.53×10^{-4} ~~5.49 x 10^-4~~
1-4 days	4.2×10^{-4}	3.4×10^{-4}	2.59×10^{-4} ~~1.05 x 10^-4~~
4-30 days	3.8×10^{-5}	2.7×10^{-5}	3.21×10^{-5} ~~2.75 x 10^-5~~
0-24 hr(1)	NA	8.7×10^{-5}	NA
24-36 hr(1)(3)	NA	5.2×10^{-5}	NA
b. Elevated release-Unit 1 Stack(2)			
0-4 hr.	1.6×10^{-4}	1.6×10^{-4}	~~NA~~ 1.39×10^{-4}
4-8 hr.	4.4×10^{-6}	4.4×10^{-6}	~~NA~~ 3.23×10^{-5}
8-24 hr.	2.4×10^{-6}	2.4×10^{-6}	~~NA~~ 1.56×10^{-5}
1-4 days	6.3×10^{-7}	6.3×10^{-7}	~~NA~~ 1.92×10^{-6}
4-30 days	9.3×10^{-8}	9.3×10^{-8}	~~NA~~ 1.32×10^{-7}
0-24 hr.(1)	NA	2.0×10^{-8}	NA
24-36 hr.(1)(3)	NA	1.2×10^{-8}	NA
c. Ground level release-ventilation vent			
0-8 hr.	NA	NA	3.75×10^{-3} ~~2.24 x 10^-3~~
8-24 hr.	NA	NA	2.28×10^{-3} ~~1.40 x 10^-3~~
1-4 days	NA	NA	7.43×10^{-4} ~~5.08 x 10^-4~~
4-30 days	NA	NA	9.69×10^{-5} ~~9.68 x 10^-5~~

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d. Unit 3 MSVB			
0-8 hr	N/A	N/A	5.78E-3
8-24 hr	N/A	N/A	3.20E-3
1-4 days	N/A	N/A	9.52E-4
4-30 days	N/A	N/A	9.16E-5
e. Unit 3 ESFB			
0-8 hr	N/A	N/A	4.86E-3
8-24 hr	N/A	N/A	2.69E-3
1-4 days	N/A	N/A	8.00E-4
4-30 days	N/A	N/A	6.77E-5
f. Unit 3 RWST			
0-8 hr	N/A	N/A	N/A
8-24 hr	N/A	N/A	8.53E-4
1-4 days	N/A	N/A	4.32E-4
4-30 days	N/A	N/A	8.03E-5

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TABLE 15.0-11

ATMOSPHERIC DISPERSION DATA USED FOR DESIGN BASIS ACCIDENT ANALYSIS

TSC X/Qs (sec./m^3)	Millstone 1[4]	Millstone 2[4]	Millstone 3
a. Ground level release-containment			
0-8 hr.	1.9×10^{-3}	1.4×10^{-3}	~~8.1×10^{-4}~~ 1.52×10^{-3}
8-24 hr.	1.3×10^{-3}	9.7×10^{-4}	~~2.7×10^{-4}~~ 4.27×10^{-4}
1-4 days	4.2×10^{-4}	3.4×10^{-4}	~~1.0×10^{-4}~~ 2.59×10^{-4}
4-30 days	3.8×10^{-5}	2.7×10^{-5}	~~3.0×10^{-5}~~ 3.21×10^{-5}
0-24 hr[1]	NA	8.7×10^{-5}	NA
24-36 hr.[1][3]	NA	5.2×10^{-5}	NA
b. Elevated release-Unit 1 Stack			
0-4 hr.	1.6×10^{-4}	1.6×10^{-4}	~~NA~~ 1.39×10^{-4}
4-8 hr.	4.4×10^{-6}	4.4×10^{-6}	~~NA~~ 3.23×10^{-5}
8-24 hr.	2.4×10^{-6}	2.4×10^{-6}	~~NA~~ 7.80×10^{-6}
1-4 days	6.3×10^{-7}	6.3×10^{-7}	~~NA~~ 1.92×10^{-6}
4-30 days	9.3×10^{-8}	9.3×10^{-8}	~~NA~~ 1.32×10^{-7}
0-24 hr.[1]	NA	2.0×10^{-8}	NA
24-36 hr.[1][3]	NA	1.2×10^{-8}	NA
c. Ground level release-ventilation vent			
0-8 hr.	NA	NA	~~2.0E-3~~ 3.75×10^{-3}
8-24 hr.	NA	NA	~~6.7E-4~~ 1.14×10^{-3}
1-4 days	NA	NA	~~4.8E-4~~ 7.43×10^{-4}
4-30 days	NA	NA	~~7.5E-5~~ 9.67×10^{-5}

INSERT K

NOTES:

1. High wind speed condition only (no fumigation).
2. Fumigation conditions assumed for 0-4 hour period.
3. X/Q values for Unit 2 high wind speed condition after 36 hours are the same as for low wind speed condition.
4. Control room X/Q values are applicable to the TSC due to the proximity of the air intakes of the two buildings.

98-MP3-100

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d. Unit 3 MSVB			
0-8 hr	N/A	N/A	5.78E-3
8-24 hr	N/A	N/A	1.60E-3
1-4 days	N/A	N/A	9.52E-4
4-30 days	N/A	N/A	9.16E-5
e. Unit 3 ESFB			
0-8 hr	N/A	N/A	4.86E-3
8-24 hr	N/A	N/A	1.35E-3
1-4 days	N/A	N/A	8.00E-4
4-30 days	N/A	N/A	6.77E-5
f. Unit 3 RWST			
0-8 hr	N/A	N/A	N/A
8-24 hr	N/A	N/A	4.27E-4
1-4 days	N/A	N/A	4.32E-4
4-30 days	N/A	N/A	8.03E-5

98-MP3-100

TABLE 15.4-4

PARAMETERS USED IN ROD EJECTION ACCIDENT ANALYSIS

	Analysis Input Parameters	
	N-Loop	N-1 Loop
1. Core thermal power (MWt)	3,636(1)	3,636(1)
2. Containment free volume (ft^3)	$2.32x10^6$	$2.32x10^6$
3. Primary coolant concentrations	Table 15.0-10	Table 15.0-10
4. Primary to secondary leak rate (gpm)	1.0	1.0
5. Secondary coolant concentration	Table 15.0-10	Table 15.0-10
~~6. Not used~~		
6 ~~7~~. Failed fuel as a result of the accident (%)	10.0	10.0
7 ~~8~~. Core and gap activity	Table 15.0-7	Table 15.0-7
8 ~~9~~. Quantity of fuel in the core which melts as a result of the accident (%)	0.25	0.25
9 ~~10~~. Quantity of radionuclides from the melted fuel available for release from the containment (%)		
a. Iodine	25.0	25.0
b. Noble gases	100	100

97-426
3/98

98-MP3-100

TABLE 15.4-4

PARAMETERS USED IN ROD EJECTION ACCIDENT ANALYSIS

	Analysis Input Parameters	
	N-Loop	N-1 Loop
10 ~~11~~. Quantity of radionuclides from the melted fuel available for release from the secondary side via primary-to-secondary leakage (%)		
a. Iodines	50.0	50.0
b. Noble gases	100	100
11 ~~12~~. Iodine partition factor in steam generator prior to and during accident	0.01	0.01
12 ~~13~~. Offsite power	Lost	Lost
13 ~~14~~. Steam dump from relief valves (lb)	40,604	40,604
14 ~~15~~. Duration of dump from relief valves (sec)	125.0	125.0
15 ~~16~~. Containment leak rate (% per day)		
a. 0-24 hrs	0.30	0.30
b. 24-720 hrs	0.15	0.15
16 ~~17~~. Bypass leakage (fraction of containment leakage)	0.042	0.042
17 ~~18~~. Time between accident and equalization of primary and secondary pressures (sec)	140.0	140.0
18. Time to Initiate SIS (min)	1	N/A
19. Time estimated for SLCRS to become effective (min)	2	2

97-426
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(92-22)
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(92-22)

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98-MP3-100

TABLE 15.4-4

PARAMETERS USED IN ROD EJECTION ACCIDENT ANALYSIS

	Analysis Input Parameters		
	N-Loop	N-1 Loop	
			97-426 3/98
20. Duration of leakage from containment (hr)	720.0	720.0	(92-22 6/92)
21. Iodine removal filter efficiency (%)	95.0	95.0	
22. Steam generator contents (lb/SG)			
a. Steam	8,000	7,600	
b. Liquid	103,000	104,000	
23. Primary coolant mass (lb)	520,000	350,000$^{(2)}$	
24. Credit for Sprays	No	N/A	

NOTES:

1. Fuel gap activities are based on reactor power of 3,636 MWt.
2. In the N-1 loop operation analysis, the pressurizer volume has been conservatively excluded from the primary coolant. 97-426

25. Iodine Inhalation Dose Conversion Factors	ICRP 30	N/A

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~~NEW~~ M[illegible] 3/30/98

98-MP3-100

TABLE 15.6-9

ASSUMPTIONS USED FOR THE RADIOLOGICAL CONSEQUENCES OF A LOCA ANALYSIS

97-426 3/98

1. Power level (MWt)	3,636	97-426
2. Core inventory	Table 15.0-7	
3. Iodine composition		
Elemental (%)	~~95.5~~ 91	
Particulate (%)	~~2.5~~ 5	
Organic (%)	~~2.0~~ 4	
4. Fraction of core inventory released into reactor coolant		
Iodine	0.5	
Noble gas	1.0	
5. Fraction of reactor coolant inventory available for release from containment		(93-52 3/94)
Iodine	1.0	
Noble gas	1.0	
6. Core inventory, available for release from containment		
Iodine (%)	~~50~~ 25	
Noble gas (%)	100	
7. Containment free volume (ft^3)	$2.3\overset{2}{\wedge} \times 10^{6}$	
8. Containment leak rate (percent per day)		
0-24 hr	0.30	
24-720 hr	0.15	
9. Bypass leakage (fraction of containment leakage)	0.042	97-426
Elemental iodine ~~plate out~~ wall deposition rate	~~3.1/hr~~ 5.1/hr	DELETE
10. Secondary enclosure time to reach negative pressure (100% bypass assumed)	2 min.	

FROM 97-MP3-543

98-MP3-100

NEW 3/30/98

TABLE 15.6-9

ASSUMPTIONS USED FOR THE RADIOLOGICAL CONSEQUENCES OF A LOCA ANALYSIS

97-426 2/98

(93-52 3/94) Containment spray assumptions

DELETE

- LENgth of Time QSS is in operation: 7480 SEC
- Volume of sprayed region = 1.17 x 10^6 x ft^3
- Volume of unsprayed region = 1.15 x 10^6 ft^3
- Maximum iodine DF during spray operation = ~~200~~ 140.2
- Quench spray operation initiation time = ~~64 sec.~~ 70.07 SEC
- Mixing rate between sprayed and unsprayed regions = 2 turnovers/hr
- Iodine removal rates in sprayed region:
  - λelem = 20.0/hr
  - λpart = ~~12.5/hr~~ 12.7/hr

97-426

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(28.)

Duration of release from containment (hr)	720

Post-LOCA Equipment Leakage

Leak initiation and cessation times	220 sec to 720 hr
Maximum operational leak rate (cc/hr)	5,000[3]
ECCS LEAKAGE LOCATION	80% ESF Building, 20% EL24'-6" Aux. Building
Fraction of core iodine inventory in sump water	0.50
Sump water temperature (°F)	256-<212
Iodine release to building atmosphere from recirculation leakage (%)	10[2]
Filter efficiency	
Elemental iodine(%)	95
Methyl iodine (%)	95
HEPA (%)	95

97-426

NOTES:

1. Includes instrument error of 2 percent.
2. Despite temperature variation, at no time is there greater than 10 percent of the water in the sump flashing to steam.
3. In accordance with SRP 15.6.5 Appendix B, Revision 1, the calculation assumed the maximum post-LOCA equipment leakage was a factor of two times the max operational leakage to give a total leakage of 10,000 cc/hr.

FROM 97-MP3-543

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11. Length of Time QSS is in Operation:		7480 sec
12. Spray Coverage		50.27%
13. Maximum Iodine DF After Instantaneous Plateout		200
14. Quench Spray Effective Time		70.2 sec
15. Mixing Rate for Unsprayed to Sprayed Regions		
	70.2 - 780 sec:	2
	780 - 830 sec:	9.99
	830 - 2700 sec:	13.32
	2700 - 4330 sec:	8.41
	4330 - 7480 sec:	6.95
16. Sprayed Region Elemental Iodine Removal Coefficients (hr-1)		
	spray	20
	plateout	5.1
17. Sprayed Region Particulate Iodine Removal Coefficients (hr-1)		
	<DF 50	12.7
	>DF 50	1.27
18. Unsprayed Region Elemental Iodine Removal Coefficients (hr-1)		
	spray	0
	plateout (0 - 1800 sec)	1.2
19. Unsprayed Region Particulate Iodine Removal Coefficients (hr-1)		
	<DF 50	0
	>DF 50	0
20. No credit taken for iodine removal after QSS stop time		
21. Percentage of Total Containment Leakage into the Secondary Containment		
	ESF building	10.59
	MSV building	23.64
	H2 Recombiner building	0.51
	Containment Enclosure	7.77
	Aux. bldg, El. 4'-6"	12.43
	Aux. bldg, El. 24'-6"	21.08
	Aux. bldg, El. 43'-6"	20.82
	Aux. bldg, El. 66'-6"	3.17
22. Secondary Containment Free Volume (ft3)		
	ESF building	168,373
	MSV building	70,000
	H2 Recombiner building	15,000
	Containment Enclosure	816,000
	Aux. bldg, all elevations	913,500

23. 50% mixing in buildings that together form the secondary containment
24. Unfiltered leakage via closed dampers occur in Aux, MSV and ESF buildings

98-MP3-100
Insert G (cont'd)

25. Unfiltered releases occur from ventilation vent, Unit 1 stack, ESF bldg roof vent and MSV bldg roof vent
26. Site boundary case: leakage values based on single damper closure, leakage occurs for 30 days
27. Ventilation and Leakage Parameters

T=0 hrs to T=30 days Post-LOCA

Ground Level Release	cfm
3HVQ-FN2 (ESF bldg normal exhaust)	77
3HVV-FN1A&B (MSVB exhaust)	134
3HVQ*ACUS1A&B (ESF bldg AC)	4
3HVQ*ACUS2A&B (ESF bldg AC)	2
Unit 1 Stack	
3GWS-FN1A&B (Process Vent Fan)	70 (Aux 66'-6")
3HVR*FN12A&B (SLCRS exhaust - duct leakage)	63 (Aux 66'-6")
Ventilation Vent	
3HVR-FN5 (Aux bldg normal exhaust)	553 (Aux 43'-6" & 66'-6")
3HVR-FN7 (Aux bldg normal exhaust)	218 (Aux bldg - all ele)
3HVR-FN8A&B (Waste Disposal bldg normal exhaust)	43 (Aux bldg 66'-6")
3HVR-FN11 (Electrical Tunnel purge air)	28
3HVR-FN9 (Fuel bldg exhaust - duct leakage)	75 (Aux bldg 66'-6")
3HVR*FN6A&B (Aux bldg filter exhaust)	17 (Aux bldg 66'-6")
3HVR*AOD44A&B (Normal exhaust isol)	113 (Aux bldg 24'-6")
3HVR*AOD32A&B (Containment purge exhaust)	118 (Aux bldg 24'-6")

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TABLE 15.6-12

ASSUMPTIONS USED FOR THE CONTROL ROOM HABITABILITY ANALYSIS

Control room (CR) parameters:		
Control room volume (ft^3)	238,226	
Control building concrete wall thickness (ft)	2	
Filtered ventilation intake rate post CR isolation (cfm)	230	97-426 3/98
Filtered recirculation rate post CR isolation (cfm)	666	97-426
Inleakage rate (cfm)	10 (115 cfm for first minute)	
Time to place ventilation on recirculation assuming loss of instrument air	40 minutes	97-426
Inleakage after depressurization until recirculation	~~230~~ 115 cfm	
Intake ventilation filter efficiencies (percent):		
HEPA	95	
Charcoal (methyl and elemental)	95	
Duration of isolation (min)	61	
Duration of unfiltered intake prior to control room isolation (sec)	5.7[2]	97-426 (96-44) 2/97
Release points (distance to Unit 3 control room intake in meters):		
Unit 1 turbine building	320	
Unit 1 stack	351	
Unit 2 containment surface	223	
Unit 3 containment surface	72	
Unit 3 reactor plant ventilation vent	38	
Control room air intake height	12.3	(92-22) 6/92

Insert H

NOTES:

1. See Table 1.9-2, SRP 6.5.1, Section B.5.

2. For analysis of assumed LOCA at either Millstone Unit 1 or 2. The duration of unfiltered inleakage is 5.7 seconds to account for 3 seconds for radiation monitor response, 3 seconds for isolation damper closure, with 0.3 seconds of activity trapped between radiation monitor and isolation damper. Other Unit 1 and Unit 2 LOCA assumptions are given in the following references: 97-426

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- Leakage values based on single damper closure
- 3HVV-FN1A/B, 3 HVQ-FN2, 3HVR-FN5 and 3HVR-FN7 are locally secured prior to 1 hour 20 minutes post-LOCA.
- Ventilation and Leakage Parameters

T=0 hrs to T=30 days Post-LOCA

Ground Level Release	cfm
3HVQ-FN2 (ESF bldg normal exhaust) **Note 1**	77
3HVV-FN1A&B (MSVB exhaust) **Note 1**	134
3HVQ*ACUS1A&B (ESF bldg AC)	4
3HVQ*ACUS2A&B (ESF bldg AC)	2
Unit 1 Stack	
3GWS-FN1A&B (Process Vent Fan)	70 (Aux 66'-6")
3HVR*FN12A&B (SLCRS exhaust - duct leakage)	63 (Aux 66'-6")
Ventilation Vent	
3HVR-FN5 (Aux bldg normal exhaust) **Note 1**	553 (Aux 43'-6" & 66'-6")
3HVR-FN7 (Aux bldg normal exhaust) **Note 1**	218 (Aux bldg - all elc)
3HVR-FN8A&B (Waste Disposal bldg normal exhaust)	43 (Aux bldg 66'-6")
3HVR-FN11 (Electrical Tunnel purge air)	28
3HVR-FN9 (Fuel bldg exhaust - duct leakage)	75 (Aux bldg 66'-6")
3HVR*FN6A&B (Aux bldg filter exhaust)	17 (Aux bldg 66'-6")
3HVR*AOD44A&B (Normal exhaust isol)	113 (Aux bldg 24'-6")
3HVR*AOD32A&B (Containment purge exhaust)	118 (Aux bldg 24'-6")

Note 1: These fans are secured at 1 hour 20 minutes post-LOCA and the bypass flow is terminated.

98-MP3-100

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TABLE 15.6-13

DOSE TO MILLSTONE 3 CONTROL ROOM ASSUMING LOCA RELEASE FROM MILLSTONE 1, 2, AND 3, RESPECTIVELY

Release From	Thyroid Dose (rem)	Whole Body Gamma Dose (rem)	Beta Skin Dose (rem)
Millstone 1	6.0E+00	1.7E-01	1.3E+00
Millstone 2			
(low wind speed condition)	2.8E+01	9.0E-01	1.2E+00
(high wind speed condition)	1.6E+01	1.1E-01	3.8E-01
Millstone 3	2.60E+01[2]	3.1E+00[2]	2.5E+01[2]

97-42
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NOTE:

1. 6.0E+00 = 6.0 x 10^0

(92-2

2. The current Control Room LOCA analysis result in a thyroid dose of ~~1.3~~ ~~1.1~~ 1.95E+01, a whole body gamma dose of ~~1.00~~ 3.0E+00 and a beta skin dose of ~~1.2~~ 2.3E+01. The current results are bounded by the licensed numbers listed in the table.

97-42

FROM FSARCR
97-MP3-543

98-MP3-100

TABLE 15.6-21

DATA USED IN THE TECHNICAL SUPPORT CENTER HABITABILITY ANALYSIS

TSC Building Parameters

Free air volume (ft^3)	33,200
Concrete wall thickness (ft)	2.0
Concrete roof thickness (ft)	1.0
Infiltration rate during isolation (cfm)	50

Ventilation Parameters

97-426
3/98

Duration of isolation (min)	30
Intake rate prior to isolation (cfm)	100
Intake rate postisolation-filtered (cfm)	100
Recirculation rate during isolation (cfm)	2,000
Recirculation rate postisolation (cfm)	1,900
Charcoal filter efficiency (methyl and elemental %)	95
HEPA filter efficiency (%)	95

Occupancy Factors

(92-22
6/92)

Time Period	Factor
0-8 hr	1.0
8-24 hr	0.5
24-96 hr	0.6
96-720 h	0.4

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- Leakage values based on double damper closure
- 3HVV-FN1A/B, 3HVR-FN5 and 3HVR-FN7 trip upon receipt of an SIS signal. 3HVQ-FN2 is secured locally at 1 hour 20 minutes post-LOCA.
- Ventilation and Leakage Parameters

Ventilation and Leakage Parameters

T=0 hrs to T=30 days Post-LOCA

Ground Level Release	cfm
3HVQ-FN2 (ESF bldg normal exhaust) **Note 1**	55 5/31/98
3HVQ*ACUS1A&B (ESF bldg AC)	4
3HVQ*ACUS2A&B (ESF bldg AC)	2
Unit 1 Stack	
3GWS-FN1A&B (Process Vent Fan)	50 (Aux 66'-6")
3HVR*FN12A&B (SLCRS exhaust - duct leakage)	63 (Aux 66'-6")
Ventilation Vent	
3HVR-FN8A&B (Waste Disposal bldg normal exhaust)	43 (Aux bldg 66'-6")
3HVR-FN9 (Fuel bldg exhaust - duct leakage)	75 (Aux bldg 66'-6")
3HVR*FN6A&B (Aux bldg filter exhaust)	17 (Aux bldg 66'-6")
3HVR*AOD44A&B (Normal exhaust isol)	80 (Aux bldg 24'-6")
3HVR*AOD32A&B (Containment purge exhaust)	118 (Aux bldg 24'-6")

Note 1: This fan is secured locally at 1 hr 20 minutes post-LOCA

98-MP3-100

TABLE 15.6-22

TECHNICAL SUPPORT CENTER 30-DAY INTEGRATED DOSE

Event	Thyroid Dose (rem)	Whole Body Gamma Dose (rem)	Beta Skin Dose (rem)
Unit 3 LOCA	~~7.4E+00(2)~~ 3.8E+00	~~1.4E+00(2)~~ 1.8E+00	~~2.5E+01(2)~~ 2.8E+01

97-42
3/98

(92-22
6/92,

Note:

1. ~~7.4~~ 3.8E+00 = ~~7.4~~ 3.8 X 10°

2. The current TSC LOCA analysis result in a thyroid dose of ~~5.1~~ 3,8 E+00, a whole body gamma dose of ~~1.8~~ 1.1 E+00 and a beta skin dose of 1.4E+01. The current results are bounded by the licensed numbers listed in the table.

97-42

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- FROM FSARCR 97-MP3-54

98-MP3-100

APPENDIX 15A

DOSE METHODOLOGY

The radiological consequences of design basis accidents are quantified in terms of thyroid doses and whole-body gamma doses at the exclusion area boundary (EAB), and at the low population zone (LPZ). The doses at the EAB are based upon releases of radionuclides over a period of two hours following the occurrence of an assumed accident; those at the LPZ are based upon releases over a thirty-day period following the occurrence of this accident. 97-426 3/98

Thyroid doses for the nonrevised accidents are calculated based upon Equation 15A-1: 97-426

$$D_{thy} = \sum_i (A_i) (X/_Q) (B.R.) (C_{thy})$$

(15A-1)

where:

D_{thy} = thyroid dose (rem)
A_i = activity of iodine isotope i released (curies)
$X/_Q$ = atmospheric dispersion factor (sec/meter^3)
B.R. = breathing rate (meter^3/sec)

and C_{thy} = thyroid dose conversion factor (rem/ci)
(Reg. Guide 1.109, 1977)

The X/Q values presented in Table 15.0-11 were calculated using the methodology described in FSAR Section 2.3.4.

Iodine nuclide contribution to the external whole body gamma dose for the nonrevised accidents is calculated using Equation 15A-2 (derived from equations in Regulatory Guide 1.4, 1974): 97-426

$$D_\gamma = 0.25 \sum_i A_i \overline{E}_{\gamma i} (X/Q)$$ 97-426

(15A-2)

where:

Align X/Q with above 3 lines

D_γ = gamma dose rate from a semi-infinite cloud (rem)
$E_{\gamma i}$ = average gamma energy per disintegration of isotope i (MeV/dis) 97-426
A_i = activity of isotope i released over the given time interval (curies)

and X/Q = atmospheric dispersion factor (sec/~~m~~ m^3) 97-426

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For the revised accidents the thyroid doses and the whole body doses are calculated by similar equations. However the dose conversion factors from ICRP 30 are used to calculate the thyroid dose.

Dose factors from Table B-1, Regulatory Guide 1.109 Revision 1 are used to calculate potential annual noble gas gamma whole body. ~~Iodine dose factors for the revised accidents are from ICRP 30~~. The equation from Regulatory Guide 1.109 is as follows:

97-426 3/98

$$D_\gamma = 3.17 X 10^4 \sum_i (Q_i) (X/Q) (DF_i^\gamma)$$

(15A-3)

where:

97-426

D_γ = annual noble gas gamma whole body dose (mrem)

Q_i = release rate of radionuclide i (Ci/year)

X/Q = atmospheric dispersion factor (sec/meter^3)

DF_i^γ = gamma whole body dose factor for a uniform semi-infinite cloud of radionuclide i $\frac{\text{mrem-m}^3}{\text{pCi-year}}$

97-426

The constant 3.17×10^4 is in units of $\frac{\text{pCi-year}}{\text{Ci-sec}}$

Dose contributions from the iodine and noble gas are added to obtain the ~~net~~ total gamma whole body dose. 97-426

The following is a list of computer programs which are used to calculate design-basis source terms and radiological consequences of the nonrevised design basis accidents in FSAR Chapter 15: 97-426

1. ACTIVITY 2

   Program ACTIVITY 2 calculates the concentration of fission products in the fuel, coolant, waste gas decay tanks, ion exchangers, miscellaneous tanks, and release lines to the atmosphere for a PWR system. The program uses a library of properties of more than 100 significant fission products and may be modified to include as many as 200 isotopes. The output of ACTIVITY 2 presents the isotopic activity and energy spectrum at the selected part of the system for a given operating time.

2. RADIOISOTOPE

   Program RADIOISOTOPE calculates the activity of isotopes in a closed system by solving the appropriate decay equations. Based on the activity of any isotope in the system at an initial time, the program calculates the activity of that isotope and its offspring at any later time, provided that the decay scheme is contained in the program library. Furthermore, because gamma activity is important for dose rate and shielding calculations, RADIOISOTOPE also calculates the energy releases in seven gamma energy groups from the decay of an inventory or radionuclides.

98-MP3-100

7. TACT III

97-426
3/98

The TACT III computer code simulates the movement of radioactivity released from a reactor core as it migrates through user-defined regions (nodes) of the containment, is immobilized by filters and sprays, and leaks to the outside environment. A run of the code carries out the integration of equations over a succession of contiguous time intervals following reactor shutdown, with the interval boundaries corresponding to transitions of system parameter values. Outputs include the level of radioactivity in each node of containment and in the environment, broken down as iodines, noble gases and solids and the radiation dose at the exclusion radius and the boundary of the low population zone.

The basic formula of dose conversion used in TACT III is the following:

$$\sum D_n = (DCF)_n B \int X_n (t) dt$$

where:

D_n = the dose (rem) to the thyroid, the beta dose (rem) to the whole body or the gamma dose (rem) to the whole body from nuclide *n*
DCF = the respective dose conversion factors
B = the breathing rate for the referenced individual (thyroid only)
X_n (t) = the air concentration of nuclide *n* over any appropriate period of time

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References for Appendix 15A

Regulatory Guide 1.109, "Calculation of Annual Doses to Man from Routine Releases of Reactor Effluents for the Purpose of Evaluating Compliance with 10CFR Part 50, Appendix I," Rev. 1, Oct. 1977.

Regulatory Guide 1.4, "Assumption Used for Evaluating the Potential Radiological Consequences of a Loss of Coolant Accident for Pressurized Water Reactor," Rev. 2, June 1974.

98-MP3-100

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8. PERC 2

Program PERC 2 is identical to DRAGON 4 in terms of the environmental transport and dose conversion, but it includes the following:

- Provision of time-dependent releases from the reac[illegible]nt system to the containment atmosphere
- Provision for airborne radionuclides other than noble gas and iodine, including daughter in-growth
- Provision for calculating organ doses other than thyroid
- Provisions for tracking time-dependent inventories of all radionuclides in all control regions of the plant model
- Provision for calculating energies as well as activities for the inventoried radionuclides to permit direct equipment qualification and vital access assessment

Docket No. 50-423
B17276

Attachment 3

Millstone Nuclear Power Station, Unit No. 3
Proposed License Amendment Request
SLCRS Bypass Leakage
(PLAR 3-98-5)
Description of the Change, Background and Safety Summary

June 1998

Background

SLCRS is used to maintain the secondary containment under a negative pressure relative to atmospheric by collecting air from the enclosure building and the connecting areas, filtering it to remove iodines, and discharging to the atmosphere.

NNECO has identified potential release pathways from secondary containment to the environment which could bypass the SLCRS filter after a LOCA. Although the SLCRS boundary is isolated by redundant safety-related dampers after the safety injection signal (SIS), certain non-nuclear safety grade fans (NNS) within the SLCRS boundary may not trip and remain running if offsite power is available. Bypass to the environment can occur through the closed boundary dampers if the supply fan HVQ-FN1 located in the Engineered Safeguards Features building trips but the exhaust fan 3HVQ-FN2 continues running. This scenario could create negative pressure in the fan suction duct work and force containment atmospheric effluent, leaked to the enclosure building, through the closed dampers to the vital areas.

The ESF supply fan receives trip signals from both trains of Safety Injection logic and will trip because of the redundancy. The exhaust fan, however, receives only a single isolation SI signal to the NNS starter.

Subsequent review of the plant ventilation systems identified additional NNS fans whose operation after an accident may affect the analyzed doses to the vital areas. These fans are identified below (the list includes fan 3HVQ-FN2 for completeness) :

3HVV-FN1A and 1B	(Main Steam Valve Building exhaust fans)
3HVR-FN5 and 7	(Auxiliary Building exhaust fans)
3HVQ-FN2*	(ESF Building exhaust fan)

[* the fan does not receive a redundant trip signal from SIS. The remaining four fans receive redundant trip signals upon SIS]

These fans are not powered by vital power, so the scenarios evaluated assume that offsite power is available.

The proposed FSAR revision addresses the changes needed to ensure that all five fans are secured within one hour and 20 minutes after an accident, prior to shifting the control room ventilation from pressurization to filtration mode.

Current Design

Control Room - two redundant systems provide ventilation to the control room envelope. The emergency ventilating filtration assembly consists of a moisture separator, electric heater, prefilter, upstream high-efficiency particulate air (HEPA) filter, charcoal adsorber, downstream HEPA filter, and associated duct work and fans. When the control room is isolated after a LOCA or high radiation alarm from intake monitors, or by manual action, the outdoor air and the exhaust air isolation butterfly valves close. The air-conditioning units serving the control room continue operating without outdoor air to maintain required humidity and temperature. Following a Control Building Isolation (CBI) signal, the control room is pressurized from one of two banks of air storage tanks to slightly above atmospheric. After one hour, the operators change the alignment to filtration/recirculation mode of operation which requires opening air-operated outside air inlet dampers 3HVC*AOV25 and 26 to introduce 230 cfm of air and re-pressurize the control room envelope. The inlet dampers are fitted with hand-wheel operators to ensure their opening should the non-safety grade instrument air system not be available.

The positive pressure in the control room provides a continuous purge of the atmosphere and protects against infiltration of smoke or airborne radiation from the surrounding areas.

Technical Support Center (TSC) - the ventilation system consists of a split-system air conditioning unit, duct-mounted electric heating coil, motor-operated dampers, and associated duct work and fans. The majority of air is recirculated and mixes with outside make-up air during normal operation.

Upon receipt of the CBI signal, motor-operated dampers modulate to their respective positions to allow for building isolation. The TSC charcoal filtration assembly starts to operate in a filtered recirculation mode (2,000 cfm of recirculated air for 30 minutes). Upon isolation, the TSC remains isolated for 30 minutes with no ventilation intake and 2,000 cfm filtered recirculation.

Thirty minutes after the building isolation signal, the solenoid-operated dampers modulate to provide 100 cfm outside air and 1,900 cfm recirculation air into the charcoal filtration assembly which is discharged to the intake of the air-conditioning unit. The system remains in this configuration for the remainder of the accident.

The original offsite dose calculations considered the impact of the potential SLCRS bypass leakage paths associated with the continued operation of the NNS fans. The containment leakage in these calculations was terminated one hour after the accident when the containment pressure was reduced to below atmospheric by the action of the Quench and Recirculation Spray systems. The offsite areas included the Exclusion Area Boundary and the Low Population Zone (EAB/LPZ). However, the original control room habitability analysis was developed without evaluating the impact of the additional bypass leakage from the SLCRS. It was believed that these paths were not limiting with respect to the control room dose analysis because:

- the NNS fans were assumed to isolate within 30 minutes following the LOCA, thus terminating the bypass leakage
- the control room pressurization system would be in service for at least 1 hour before filtered outside air would be introduced by re-alignment of the control room ventilation system

In 1992, a major design change was implemented which changed the MP3 primary containment from sub-atmospheric to near-atmospheric design. A calculation was performed to support the license amendment to eliminate the negative pressure design and revise the radiological doses in the EAB and LPZ. To compensate for the fact that the post-LOCA containment leakage would exist for 30 days with the near-atmospheric containment, instead of 1 hour, the following assumptions and input changes were made in the dose analysis:

- the design containment leakage rate was changed from 0.9% per day to 0.65% per day,
- credit was taken for iodine removal in the containment atmosphere by the Quench and Recirculation Spray systems.

As a result of this design change, significant revisions to the FSAR were also made. Part of the change included a revision to the Chapter 15 dose analysis description and results. Inexplicably, the revision deleted the description and assumptions associated with the NNS fan discharge bypass pathways which were not evaluated in the new analysis. No specific reason or justification was provided in the FSAR for the exclusion of the bypass paths discharging through the closed SLCRS boundary dampers from the dose source terms.

Description of the Change

Recently, a new radiological dose analysis has been completed which included the source term from the bypass leakage. The analysis recalculated the doses to the EAB and LPZ populations, as well as to the Control Room and TSC vital areas. Three separate leakage scenarios were developed and analyzed, as described below:

Bypass Leakage for the EAB/LPZ Dose Analysis

For this case, NNS fans discharging from the secondary containment are assumed to continue operating, with leakage through associated boundary dampers, for the entire 30 day dose analysis period. A limiting single failure of a complete train of ESF equipment to operate is postulated, which results in only one of two redundant boundary dampers closing. Offsite power is assumed available throughout the accident.

Bypass Leakage for the Unit 3 Control Room Dose Analysis

As in the LPZ/EAB case, a limiting single failure of a complete train of ESF equipment to operate is postulated. Only one of the two redundant boundary dampers close. NNS fans continue to run for 1 hour and 20 minutes after the accident. At that time the five fan breakers are assumed tripped. At 1 hour and 40 minutes, the control room ventilation system is re-aligned to the filtered recirculation mode and the control room is repressurized. Offsite power is assumed available throughout the accident.

Bypass Leakage for the TSC Dose Analysis

For the TSC dose analysis, offsite power is assumed available and credit is taken for the NNS fan trip circuits to operate as designed. This means that fans 3HVV-FN1A and B, 3HVR-FN5 and 7 will trip, but fan 3HVQ-FN2 will continue to run until secured by an operator 1 hour and 20 minutes after the accident. The basis for this assumption is that it is consistent with the design basis for the TSC ventilation system, which is not a safety-grade system. A reliability analysis of the NNS fan trip circuit components demonstrated that the reliability of the NNS fan trip circuits is equal to, or better than, the NNS TSC ventilation system components which are relied upon to provide a level of protection for accident mitigation and support personnel.

The FSAR will be revised to include a description of the additional bypass leakage paths and incorporate the consequent effects. As part of these analyses, access to the fan motor and load control centers after an accident was evaluated and documented. Appropriate changes are being processed in accordance with plant procedures.

SAFETY SUMMARY

The addition of the dose from the potential SLCRS bypass leakage to the Design Basis LOCA and rod ejection analyses, and to the FSAR description, is determined to be an Unreviewed Safety Question. Previously, no leakage was assumed in the dose analysis for the Unit 3 control room and the Technical Support Center vital areas. The change is deemed safe because the radiological consequences remain bounded by the 10CFR100 and GDC 19 limits. The only increase in the calculated dose is to the TSC. The doses to the EAB, LPZ and the control room areas remain below the current licensing basis. Operator action needs to be credited to ensure that all NNS fan breakers are tripped no later than 1 hour and 20 minutes after the accident.

Docket No. 50-423
B17276

Attachment 4

Millstone Nuclear Power Station, Unit No. 3
Proposed License Amendment Request
SLCRS Bypass Leakage
(PLAR 3-98-5)
Significant Hazards Consideration and Environmental Considerations

June 1998

Significant Hazards Consideration

NNECO has reviewed the proposed revision in accordance with 10CFR50.92 and has concluded that the revision does not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not satisfied. The proposed revision does not involve a SHC because the revision would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

   The potential condition of radioactive effluent bypassing the isolated boundary in the Supplemental Leak Collection and Release System after an accident cannot contribute to the probability of an accident previously evaluated. The leakage is caused by a postulated failure of the non-nuclear safety grade exhaust fans within the SLCRS boundary to trip after a safety injection signal. Operator action is needed to verify that the fans in question are tripped within a predetermined time delay after the accident in order that credit can be taken in the radiological dose analysis for the isolation of this source.

   The proposed operator action will verify that the power to the fan motors is terminated, which cannot create any conditions leading to a new accident. The verification will augment the procedure to minimize the consequences of the accident itself. The trip circuits of the fan motors do not interface with safety systems.

   The consequences of the limiting design basis accidents have been evaluated with the additional bypass leakage. The doses for the Exclusion Area Boundary, Low Population Zone and Unit 3 Control room remain below the previously calculated and approved licensing values. The calculated doses for the Technical Support Center are higher than previously approved, but below the radiological acceptance criteria of GDC 19.

   Therefore, the proposed license amendment does not involve a significant increase in the probability or consequence of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

   There are no conceivable conditions, created by the proposed operator action, that may lead to the possibility of a new accident. Interruption of power to the exhaust fans is, in itself, a part of accident mitigating activity. The proposed activity cannot create an adverse environment where a possibility of a new accident has to be considered.

The breakers used to de-energize the fans, control only the fan motors and no other equipment. Clear labeling ensures that no safety equipment is inadvertently de-activated. The revised ventilation system operating procedure will clearly specify the order of steps and confirmatory indicators necessary for safe shutdown of the exhaust fans. The equipment operator will be briefed before proceeding to open the breakers to the affected fan motors. To minimize the possibility of an error, this step will be done early in the sequence of procedural steps performed to re-align the control room ventilation system to the filtration/recirculation mode of operation after an accident.

Therefore, the proposed license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

In considering the impact of the proposed revision on the margin of safety, as defined in the Technical Specifications, the impact on the design basis analysis of the fission product barriers must be evaluated.

The proposed operator action to trip the fans is done as part of personnel protective actions after a major accident, which is to stop the distribution of radioactive iodine into the vital areas through the ventilation system within a predetermined time. The maintenance of the fission product barriers is not affected by this action. This potential source of radioactivity associated with the ventilation fans discharging through the closed SLCRS boundary dampers has not been considered previously in the dose analysis. Including this source results in a small increase in the gamma and beta doses to the Technical Support Center. The GDC 19 limits for protection of personnel in the vital areas however, are not violated. The calculated doses to EAB/LPZ zones and to the control room vital area remain below the current licensing base values.

Therefore, the proposed license amendment request does not involve a significant reduction in the margin of safety,

In conclusion, based on the information provided, it is determined that the proposed revision does not involve an SHC.

Environmental Considerations

NNECO has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed revision does not involve an SHC, does not significantly increase the type and amounts of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, NNECO concludes that the proposed revision meets the criteria delineated in 10CFR51.22(c)(9) for categorical exclusion from the requirements for environmental review.