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February 7, 2012

Document control desk License Amendment Request R-2 Docket 50-005

Dear Sir/Madame:

Attached please find a request for amendment of the Penn State Breazeale Reactor R-2 license. Extensive modernization and upgrades are being conducted to the Radiation Science and Engineering Center with Penn State funds. One of these upgrades includes a reactor bay ventilation system improvement that impacts the Technical Specifications. In addition to the changes requested to support the modification, other changes are requested to eliminate specifications that duplicate specific regulation, correct inconsistencies, and modify specifications that are not consistent with ANS/ANSI 15.1 and are not required to protect the accident assumptions or analysis in the Safety Analyses Report (SAR).

Along with the justification for the specific changes, a description of the modification and an updated Chapter 6 of the SAR are included for information.

Please exempt this request from fees per 10CFR170.11.a.(4)

If there are any questions regarding the information submitted, please contact Mr. Mark A. Trump, Associate Director for Operations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on ______02.0712_____

Sincerely,

Henry C. Huy

Henry C. Foley Vice President for Research Dean of the Graduate School

Attachments:

Ventilation Modification Description Technical Specification Change Detail and Justification Updated Technical Specifications Updated PSBR SAR Chapter 6

CC - electronic

R.A. Nelson - NRC Xiaosong Yin – NRC Greg Schoenebeck – NRC NRC correspondence File

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REACTOR BAY HEATING AIR CONDITIONING, VENTILATION AND EXHAUST MODIFICATION DESCRIPTION

As described in the Safety Analysis Report Chapter 6, the reactor bay (confinement) is serviced by operation of one of two roof mounted exhaust fans (Facility Exhaust System – FES). Upon evacuation alarm activation, the FES fans shutdown and the Emergency Exhaust System (EES) starts. The normal heating and air condition systems for the reactor bay (described in SAR Chapter 9) are antiquated and in need of replacement. The information below is on the planned modification and is provided to assist in the review process. Some minor aspects of the modification may change during the installation process.

A new system has been designed and is being installed to provide the heating and ventilation needs of the reactor bay as well as an energy efficient air makeup and exhaust system. The existing roof top FES fans are being incorporated into this system and the existing EES system is unchanged. The new energy-efficient heating, cooling and exhaust system (designated reactor bay heating, ventilation, air conditioning and exhaust system - RBHVES) will interface with the evacuation alarm system in a similar manner as the existing FES (shutdown and isolate on evacuation alarm) and consists of the following components and design features:

- Two existing powered roof fans (operate during economizer conditions and provide backup exhaust)
- Heat Recovery Unit (HRU-02 Variable speed exhaust and makeup fans with enthalpy wheel)
- Exhaust discharge stack to above the reactor bay roof height
- Modulating control dampers (determines makeup, recirculation, and exhaust flow)
- Recirculating air cooling and heating unit (RAHU-02 filtration, heating coils, cooling coils, recirculation fan)
- Makeup air and overpressure relief dampers
- Two new confinement penetrations for supply and exhaust of conditioned air to the reactor bay
- Two fast-closure confinement isolation dampers
- Break away ducting connections (maintains confinement if roof mounted components are damaged by exterior forces)
- Non-visible security features
- Heavy gauge materials through confinement isolation dampers to a break-away feature (ensures integrity of confinement if external ductwork is compromised)
- Monitoring and control (damper and fan status, occupancy/operation programming, temperature sensors, differential pressure sensors, reactor bay negative pressure sensors and indication)
- Reactor bay supply and exhaust header duct work
- Split HVAC unit for control room heating and air conditioning

The new system has four basic modes of operation Secured, Occupied, Unoccupied, and Emergency.

Secured/Shutdown (also loss of power) mode – fast acting confinement isolation dampers shut (monitored and indicted via position switches) at confinement penetrations; fans shutdown, modulating flow control dampers fail as is or move to programmed position.

REACTOR BAY HEATING AIR CONDITIONING, VENTILATION AND EXHAUST MODIFICATION DESCRIPTION

Occupied mode – as programmed, whenever the reactor is in operation, or whenever the operators demand occupied, the exhaust/makeup/recirculation fan operate to provide 6000 cfm of reactor bay return/exhaust flow. Flow is in through a new return/exhaust screen and ductwork (above the control room), a new penetration in the waffle structure, new security barrier, and a new (open) confinement isolation damper. At this point, flow is split into return air (recycled for temperature control) and exhaust air. The amount of flow is control by the balanced modulating action of the exhaust and return air dampers in conjunction with the variable speed drive fans. Approximately 3500 cfm of exhaust air goes through the exhaust fan and the enthalpy wheel located in heat recovery unit 2 (HRU-2). HRU-2 recovers usable energy in the exhaust air for use in treatment of makeup air. Exhaust air leaves HRU-2 and is directed to a new exhaust stack on the southwest corner of the reactor bay. The air exhausts the stack at roof level (greater than 34 ft. above ground level) to maintain the original FES exhaust elevation as described in the SAR.

Filtered fresh makeup air is drawn through HRU-2 (where exhaust air heat is recovered) past the modulating makeup air damper to mix with return air. The exhaust, return, and makeup air dampers work with the variable speed fans to maintain a negative pressure in the reactor bay (more exhaust than makeup).

The combined fresh makeup and return air is drawn into the recirculating air handling unit (RAHU-2) where the air is filtered and temperature is adjusted (heated or cooled) as necessary to follow the temperature program. The supply air is now returned to the reactor bay distribution header through a confinement isolation damper, security barrier, and a new confinement penetration.

During some weather conditions, the control system will secure cooling and operate the existing roof fans with maximum fresh air makeup air (economizer operation) to save energy. Negative pressure in the reactor bay will still be maintained and indicated.

Unoccupied mode – The system operates as described in occupied mode above, except that the amount of exhaust and makeup air is reduced to conserve energy and temperature profile adjusted according to program.

Emergency mode – When the building evacuation alarm is activated, the fast-acting confinement isolation dampers will close, and exhaust, makeup, recirculation, and any operating roof fans will shutdown. The filtered emergency exhaust system will operate to provide negative reactor bay pressure. Emergency operation on loss of normal AC power is the same if the diesel operates as designed (and provides electrical power to the EES system). With no power available all fans shutdown and confinement isolation dampers close.

TECHNICAL SPECIFICATION CHANGE DETAIL AND JUSTIFICATION

A review of the modification to the ventilation systems was conducted in accordance with 10 CFR 50.59. The results indicated that NRC pre-approval of the modification installation was not required. However, Technical Specification changes are required to support the operation of the system. As noted in the cover letter, other changes are requested to eliminate specifications that duplicate specific regulation, correct inconsistencies, and to modify specifications that are not consistent with ANS/ANSI 15.1-2007 and are not required to protect the accident assumptions or analysis in the Safety Analyses Report (SAR).

LIMITING CONDITIONS FOR OPERATIONS (LCO)

TS 3.3.1 Non-Pulse Mode Operation - Basis b. Corrected SAR Chapter 13 reference.

TS 3.3.3 Fission Product Activity - removed the requirement that air particulate monitor activate the building evacuation alarm.

Justification: This change removes a TS inconsistency and aligns this specification with TS 3.6.2 Evacuation Alarm which allows for automatic or manual actuation. The automatic actuation is not required for protection of the public, and local or remote alarm is sufficient to protect workers.

TS 3.4 Confinement was completely re-written to more closely align with ANS/ANSI 15.1- 2007, TS 1.1.8 (definition of confinement), and provide clear guidance for control of penetrations.

Justification: Confinement is defined as the "*an enclosure on the overall facility which controls the movement of air into it and out through a controlled path.*" For this to be satisfied the enclosure must be intact with no large opening that could significantly redirect the flow of air. The Maximum Hypothetical Accident (MHA) analysis in Chapter 13 of the SAR assumes that a confinement exists. The minimum size of the confinement is a MHA assumption and is specified in TS 5.5.a Reactor Bay Confinement and Ventilation Systems. The MHA also conservatively assumes an exhaust system controls the flow rate of the hypothetical release. Filtration of the exhaust is not assumed to function in the MHA.

The rewritten TS 3.4 protects the MHA assumptions by defining the boundary limitations and controlling penetrations. Ventilation is specified in TS 3.5 Ventilation Systems. Temporary openings in the confinement (doors and penetrations) are acceptable. Penetrations of any reasonable size only affect the source location of inflow air when ventilation is running. Requirements in TS 3.4 ensure the existing enclosure is intact or low pressure boundaries established or provisions and personnel in place to restore the enclosure. Refer to TS 3.4 and TS 3.5 basis for more information.

TECHNICAL SPECIFICATION CHANGE DETAIL AND JUSTIFICATION

TS 3.5 Ventilation Systems was partially rewritten to support the reactor bay heating ventilation air conditioning and exhaust system modification. Additionally, time clocks for restoration of exhaust flow and completion of in-progress fuel movement are provided to prevent instantaneous LCO violation and a reportable event for momentary flow interruption. A longer time interval for repair or maintenance of the emergency exhaust is provided to allow continued operations while repairs are conducted.

Justification: The operation of any of the reactor bay exhaust fans (reactor bay heating ventilation air conditioning and exhaust system or the emergency exhaust system) will ensure that there is no buildup of airborne radioactive material. If all exhaust to the reactor bay is temporarily lost, the 1 hour time limit to restore exhaust allows operators to investigate and respond. Reactor bay area radiation and/or air radiation monitors will continue to alert personnel before a hazardous condition develops.

Since the probability of a fission product release is higher during movement of fuel or fueled experiments, TS 3.5 requires operation of ventilation and requires that the emergency exhaust system be operable. There is no change in this requirement. TS 3.7 Limitations of Experiments limits fueled experiments to a fraction of the MHA assumptions. A new remedial action is added to TS 3.5 to allow completion of any in progress fuel or experiment movements and prevent instantaneous LCO violation should an exhaust fan fail. Refer to the TS 3.5 basis for more information.

TS 3.6.1 and 4.6.1 Radiation Monitoring The term Beam Hole laboratory was replaced with Neutron Beam Laboratory throughout technical specifications and the basis.

TS 3.6.2 Evacuation Alarm specification was changed to allow a time clock or substitute mechanism for notifying personnel of the need for evacuation. The basis was changed to support the specification and allow for future system improvements.

Justification: The evacuation alarm is a facility-wide alarm used to alert the building occupants of a hazardous condition. Like the fire alarm, personnel are trained to evacuate the building and proceed to a muster area for accountability. The specification change anticipates incorporation of the existing obsolete evacuation alarm system into the facility's life safety alarm system (fire alarm). The building code required life safety system is hardened and includes strobes to alert possible hearing impaired personnel. To accommodate routine maintenance and testing by outside personnel, a time clock is needed. Since the likelihood of an evacuation is low, a one hour clock is reasonable. Within one hour, operations personnel will return the system to operation or ensure another means of notifying personnel to evacuate is available and verified functional.

TS 3.6.3 Argon-41 Discharge Limits was deleted in its entirety.

Justification: The specification is redundant to the requirements of 10CFR20 and is evaluated and annually reported per TS 6.6.1.e Operating Reports. Experience has shown that even if all operations are performed at the fixture which generates the most Argon-41, the facility releases only a small fraction of the annual limit and is less than the 20% reporting limits.

Section 3.6.4 ALARA was deleted in its entirety.

Justification: ALARA has been codified and the specification is now redundant to the requirements of 10CFR20.

TECHNICAL SPECIFICATION CHANGE DETAIL AND JUSTIFICATION

SURVEILLANCE REQUIREMENTS

4.4 Confinement: The specification is completely rewritten to support and surveil the requirements of TS 3.4 Confinement.

Justification: The revised surveillance specifies daily (during operation) verification of the operability of doors and penetrations to support operations in accordance with TS 3.4. The requirements of the Physical Security Plan are not changed. Refer to the TS 4.4 basis for more information.

TS 4.5 Ventilation Systems is changed to rename the affected components and is technically the same.

Justification: The Facility Exhaust System has been renamed to the reactor bay heating ventilation air conditioning and exhaust system. See Chapter 6 of the Updated SAR (provided for information only)

TS 4.6 Radiation Monitoring System and Evacuation Alarm: is renamed from Radiation Monitoring System and Effluents. The evacuation alarm requirements have been moved from TS 4.6.1 to TS 4.6.2 and the previous redundant section (TS 4.6.2 Effluents) has been replaced in its entirety. TS 4.6.1 has been reformatted for clarity. TS 4.6.3 ALARA is removed.

Justification: Evacuation alarm requirements were removed from 4.6.1 for clarity. The requirements to channel check the radiation monitors has been changed to align the wording with other daily TS required checks. All checks have been aligned to support operation of the reactor and are not required if operations are not conducted or scheduled. The previous TS 4.6.2 Effluents (now deleted) was nonspecific, redundant to the requirements of 10CFR20, and is evaluated and annually reported per TS 6.6.1.e Operating Reports. TS 4.6.3 ALARA has been codified and is now redundant to the requirements of 10CFR20. Therefore removal of TS 4.6.2 and TS 4.6.3 has no impact on the health and safety of the public and do not reduce the regulatory requirements on the facility.

DESIGN FEATURES

TS 5.5 Reactor Bay Confinement and Ventilation Systems is revised to rename the affected components and correct the building height. It remains technically the same.

Justification: The Facility Exhaust System has been renamed to the reactor bay heating ventilation air conditioning and exhaust system. See Chapter 6 of the Updated SAR (provided for information only).

ADMINISTRATIVE CONTROLS

TS 6.1.1 Structure corrected Vice President Title in the text for the reporting chain of the Radiation Protection Manager.

TS 6.7.3 Records to be Retained for the Life of the Reactor Facility (item a) is reworded to eliminate the reference to visitors.

Justification: the wording and requirements were revised to be consistent with ANSI/ANS 15.1-2007 and 10CFR20 and refer directly to the applicable section of 10CFR20 to ensure correct implementation.

FACILITY OPERATING LICENSE R-2

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APPENDIX A

TECHNICAL SPECIFICATIONS FOR THE PENNSYLVANIA STATE UNIVERSITY BREAZEALE REACTOR

DOCKET NO. 50-005

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1.0 **INTRODUCTION**

Included in this document are the Technical Specifications (TS) and the Bases for the Technical Specifications. These Bases, which provide the technical support for the individual technical specifications, are included for information purposes only. They are not part of the Technical Specifications and they do not constitute limitations or requirements to which the licensee must adhere.

- 1.1 <u>Definitions</u>
 - 1.1.1 <u>ALARA</u>

The ALARA (As Low As Reasonably Achievable) program is a program for maintaining occupational exposures to radiation and release of radioactive effluents to the environs as low as reasonably achievable.

1.1.2 <u>Automatic Control</u>

Automatic control mode operation is when normal reactor operations, including start up, power level change, power regulation, and protective power reductions are performed by the reactor control system without, or with minimal, operator intervention.

1.1.3 Channel

A channel is the combination of sensor, line, amplifier, and output devices which are connected for the purpose of measuring the value of a parameter.

1.1.4 <u>Channel Calibration</u>



A channel calibration is an adjustment of the channel such that its output responds, with acceptable range, and accuracy, to known values of the parameter which the channel measures. Calibration SHALL encompass the entire channel, including equipment actuation, alarm, or trip, and SHALL be deemed to include a Channel Test.

1.1.5 Channel Check

A channel check is a qualitative verification of acceptable performance by observation of channel behavior. This verification, where possible, SHALL include comparison of the channel with other independent channels or systems measuring the same variable.

1.1.6 <u>Channel Test</u>

A channel test is the introduction of a signal into the channel to verify that it is operable.

1.1.7 <u>Cold Critical</u>

Cold critical is the condition of the reactor when it is critical with the fuel and bulk water temperatures both below 100° F (37.8°C).

1.1.8 <u>Confinement</u>

Confinement means an enclosure on the overall facility which controls the movement of air into it and out through a controlled path.

1.1.9 Excess Reactivity

Excess reactivity is that amount of reactivity that would exist if all control rods (safety, regulating, etc.) were moved to the maximum reactive condition from the point where the reactor is exactly critical (keff=1 (one)) in the reference core condition.

1.1.10 Experiment

Experiment SHALL mean (a) any apparatus, device, or material which is not a normal part of the core or experimental facilities, but which is inserted in these facilities or is in line with a beam of radiation originating from the reactor core; or (b) any operation designed to measure reactor parameters or characteristics.

1.1.11 Experimental Facility

Experimental facility SHALL mean beam port, including extension tube with shields, thermal column with shields, vertical tube, central thimble, in-core irradiation holder, pneumatic transfer system, and in-pool irradiation facility.

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1.1.12 Instrumented Element

An instrumented element is a TRIGA fuel element in which sheathed chromel-alumel or equivalent thermocouples are embedded in the fuel.

Limiting Conditions for Operation

Limiting conditions for operation of the reactor are those constraints included in the Technical Specifications that are required for safe operation of the facility. These limiting conditions are applicable only when the reactor is operating unless otherwise specified.

1.1.14 Limiting Safety System Setting

A limiting safety system setting (LSSS) is a setting for an automatic protective device related to a variable having a significant safety function.

1.1.15 <u>Manual Control</u>

Manual control mode is operation of the reactor with the power level controlled by the operator adjusting the control rod positions.

1.1.16 Maximum Elemental Power Density

The maximum elemental power density (MEPD) is the power density of the element in the core producing more power than any other element in that loading. The power density of an element is the total power of the core divided by the number of fuel elements in the core multiplied by the normalized power of that element. This definition is only applicable for non-pulse operation.

1.1.17 Maximum Power Level

Maximum Power Level is the maximum measured value of reactor power for non-pulse operation.

1.1.18 <u>Measured Value</u>

The measured value is the value of a parameter as it appears on the output of a channel.

1.1.19 Movable Experiment

A movable experiment is one where it is intended that the entire experiment may be moved in or near the core or into and out of the reactor while the reactor is operating.

1.1.20 Normalized Power

The normalized power, NP, is the ratio of the power of a fuel element to the average power per fuel element.

Operable means a component or system is capable of performing its intended function

1.1.22 Operating

1.1.21 Op<u>erable</u>

Operating means a component or system is performing its intended function.

1.1.23 <u>Pulse Mode</u>

Pulse mode operation SHALL mean operation of the reactor allowing the operator to insert preselected reactivity by the ejection of the transient rod.

1.1.24 <u>Reactivity Limits</u>

The reactivity limits are those limits imposed on reactor core reactivity. Quantities are referenced to a reference core condition.

1.1.25 Reactivity Worth of an Experiment

The reactivity worth of an experiment is the maximum absolute value of the reactivity change that would occur as a result of intended or anticipated changes or credible malfunctions that alter experiment position or configuration.

1.1.26 <u>Reactor Control System</u>

The reactor control system is composed of control and operational interlocks, reactivity adjustment controls, flow and temperature controls, and display systems which permit the operator to operate the reactor reliably in its allowed modes.

1.1.27 <u>Reactor Interlock</u>

A reactor interlock is a device which prevents some action, associated with reactor operation, until certain reactor operation conditions are satisfied.

1.1.28 <u>Reactor Operating</u>

The reactor is operating whenever it is not secured or shutdown.

1.1.29 Reactor Secured

The reactor is secured when:

a. It contains insufficient fissile material or moderator present in the reactor, adjacent experiments, or control rods, to attain criticality under optimum available conditions of moderation, and reflection, OR

A combination of the following:

1) The minimum number of neutron absorbing control rods are fully inserted or other safety devices are in shutdown positions, as required by technical specifications,

AND

2) The console key switch is in the off position and the key is removed from the lock,

AND

3) No work is in progress involving core fuel, core structure, installed control rods, or control rod drives unless they are physically decoupled from the control rods,

AND

4) No experiments in or near the reactor are being moved or serviced that have, on movement, a reactivity worth exceeding the maximum value allowed for a single experiment or one dollar whichever is smaller.

1.1.30 Reactor Shutdown

The reactor is shutdown if it is subcritical by at least one dollar in the reference core condition and the reactivity worth of all experiments is included.

1.1.31 <u>Reactor Safety System</u>

Reactor safety systems are those systems, including their associated input channels, which are designed to initiate automatic reactor protection or to provide information for initiation of manual protective action.

1.1.32 <u>Reference Core Condition</u>

The condition of the core when it is at ambient temperature (cold) and the reactivity worth of xenon is negligible ($<0.21\% \Delta k/k$ (\sim \$0.30)).

1.1.33 <u>Research Reactor</u>

A research reactor is defined as a device designed to support a self-sustaining neutron chain reaction for research, development, educational, training, or experimental purposes, and which may have provisions for the production of radioisotopes.

1.1.34 Reportable Occurrence

A reportable occurrence is any of the following which occurs during reactor operation:

a. Operation with the safety system setting less conservative than specified in TS 2.2, Limiting Safety System Setting.

- b. Operation in violation of a limiting condition for operation.
- c. Failure of a required reactor safety system component which could render the system incapable of performing its intended safety function.
- d Any unanticipated or uncontrolled change in reactivity greater than one dollar
- e. An observed inadequacy in the implementation of either administrative or procedural controls which could result in operation of the reactor outside the limiting conditions for operation.
- f. Release of fission products from a fuel element.
- g. Abnormal and significant degradation in reactor fuel, cladding, coolant boundary or confinement boundary that could result in exceeding 10 CFR Part 20 exposure criteria.

1.1.35 Rod-Transient

The transient rod is a control rod with SCRAM capabilities that is capable of providing rapid reactivity insertion for use in either pulse or square wave mode of operation.

1.1.36 Safety Limit

Safety limits are limits on important process variables which are found to be necessary to reasonably protect the integrity of certain physical barriers which guard against the uncontrolled release of radioactivity. The principal physical barrier is the fuel element cladding.

1.1.37 SCRAM Time

SCRAM time is the elapsed time between reaching a limiting safety system set point and a specified control rod movement.

1.1.38 Secured Experiment

A secured experiment is any experiment, experimental facility, or component of an experiment that is held in a stationary position relative to the reactor by mechanical means. The restraining forces must be substantially greater than those to which the experiment might be subjected to by hydraulic, pneumatic, buoyant, or other forces which are normal to the operating environment of the experiment, or by forces which can arise as a result of credible malfunctions.

1.1.39 Secured Experiment with Movable Parts

A secured experiment with movable parts is one that contains parts that are intended to be moved while the reactor is operating.

1.1.40 Shall, Should, and May

The word "shall" is used to denote a requirement; the word "should" to denote a recommendation; and the word "may" to denote permission, neither a requirement nor a recommendation.

- 1.1.41 Shim, Regulating, and Safety Rods

A shim, regulating, or safety rod is a control rod having an electric motor drive and SCRAM capabilities. It has a fueled follower section.

1.1.42 Shutdown Margin

Shutdown margin SHALL mean the minimum shutdown reactivity necessary to provide confidence that the reactor can be made subcritical by means of the control and safety systems starting from any permissible operating condition although the most reactive rod is in its most reactive position, and that the reactor will remain subcritical without further operator action.

1.1.43 Square Wave Mode

Square wave (SW) mode operation SHAEL mean operation of the reactor allowing the operator to insert preselected reactivity by the ejection of the transient rod, and which results in a maximum power within the license limit.

1.1.44 <u>Steady State Power Level</u>

Steady state power level is the nominal measured value of reactor power to which reactor power is being controlled whether by manual or automatic actions. Minor variations about this level may occur due to noise, normal signal variation, and reactivity adjustments. During manual, automatic, or square wave modes of operation, some initial, momentary overshoot may occur.

1.1.45 TRIGA Fuel Element

A TRIGA fuel element is a single TRIGA fuel rod of standard type, either 8.5 wt% U-ZrH in stainless steel cladding or 12 wt% U-ZrH in stainless steel cladding enriched to less than 20% uranium-235.

l.1.46 Watchdog Circuit

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A watchdog circuit is a circuit consisting of a timer and a relay. The timer energizes the relay as long as it is reset prior to the expiration of the timing interval. If it is not reset within the timing interval, the relay will de-energize thereby causing a SCRAM.

2.0 SAFETY LIMIT AND LIMITING SAFETY SYSTEM SETTING

2.1 <u>Safety Limit - Fuel Element Temperature</u>

Applicability

The safety limit specification applies to the maximum temperature in the reactor fuel.

<u>Objective</u>

The objective is to define the maximum fuel element temperature that can be permitted with confidence that no damage to the fuel element and/or cladding will result.

Specification

The temperature in a water-cooled TRIGA fuel element SHALL NOT exceed 1150°C under any operating condition.

Basis

The important parameter for a TRIGA reactor is the fuel element temperature. This parameter is well suited as a single specification especially since it can be measured at a point within the fuel element and the relationship between the measured and actual temperature is well characterized analytically. A loss in the integrity of the fuel element cladding could arise from a build-up of excessive pressure between the fuel-moderator and the cladding if the maximum fuel temperature exceeds 1150°C. The pressure is caused by the presence of air, fission product gases, and hydrogen from the dissociation of the hydrogen and zirconium in the fuel-moderator. The magnitude of this pressure is determined by the fuel-moderator temperature, the ratio of hydrogen to zirconium in the alloy, and the rate change in the pressure.

The safety limit for the standard TRIGA fuel is based on data, including the large mass of experimental evidence obtained during high performance reactor tests on this fuel. These data indicate that the stress in the cladding due to the increase in the hydrogen pressure from the dissociation of zirconium hydride will remain below the ultimate stress provided that the temperature of the fuel does not exceed 1150°C and the fuel cladding is below 500°C. See Safety Analysis Report, Ref. 13 and 30 in Section 13 and Simnad, M.T., F.C. Foushee, and G.B. West, "Fuel Elements for Pulsed

Reactors," Nucl. Technology, Vol. 28, p. 31-56 (January 1976).

2.2 Limiting Safety System Setting (LSSS)

Applicability

The LSSS specification applies to the SCRAM setting which prevents the safety limit from being reached.

Objective

The objective is to prevent the safety limit (1150°C) from being reached.

Specification

The limiting safety system setting SHALL be a maximum of 650°C as measured with an instrumented fuel element if it is located in a core position representative of the maximum elemental power density (MEPD) in that loading. If it is not practical to locate the instrumented fuel in such a position, the LSSS SHALL be reduced. The reduction of the LSSS SHALL be by a ratio based on the calculated linear relationship between the normalized power at the monitored position as compared to normalized power at the core position representative of the MEPD in that loading.

Basis

The limiting safety system setting is a temperature which, if reached, SHALL cause a reactor SCRAM to be initiated preventing the safety limit from being exceeded. Experiments and analyses described in the Safety Analysis Report, Section 13 - Accident Analysis, show that the measured fuel temperature at steady state power has a simple linear relationship to the normalized power of a fuel element in the core. Maximum fuel temperature occurs when an instrumented element is in a core position of MEPD. The actual location of the instrumented element and the associated LSSS SHALL be chosen by calculation and/or experiment prior to going to maximum reactor operational power level. The measured fuel temperature during steady state operation is close to the maximum fuel temperature in that element. Thus, 500°C of safety margin exists before the 1150°C safety limit is reached. This safety margin provides adequate compensation for variations in the temperature profile of depleted and differently loaded fuel elements (i.e. 8.5 wt% vs. 12 wt% fuel elements). See Safety Analysis Report, Chapter 13.

If it is not practical to place an instrumented element in the position representative of MEPD the LSSS SHALL be reduced to maintain the 500°C safety margin between the 1150°C safety limit and the highest fuel temperature in the core if it was being measured. The reduction ratio SHALL be determined by calculation using the accepted techniques used in Safety Analysis Report, Chapter 13.

In the pulse mode of operation, the same LSSS SHALL apply. However, the temperature channel will have no effect on limiting the peak power or fuel temperature, generated, because of its relatively long time constant (seconds), compared with the width of the pulse (milliseconds).

3.0 LIMITING CONDITIONS FOR OPERATION

The limiting conditions for operation as set forth in this section are applicable only when the reactor is operating. They need not be met when the reactor is shutdown unless specified otherwise.

3.1 <u>Reactor Core Parameters</u>

3.1.1 Non-Pulse Mode Operation

Applicability

These specifications apply to the power generated during manual control mode, automatic control mode, and square wave mode operations.

Objective

Basis

The objective is to limit the source term and energy production to that used in the Safety Analysis Report.

Specifications

- a. The reactor may be operated at steady state power levels of 1 MW (thermal) or less.
- b. The maximum power level SHALL be no greater than 1.1 MW (thermal).
- c. The steady state fuel temperature SHALL be a maximum of 650°C as measured with an instrumented fuel element if it is located in a core position representative of MEPD in that loading. If it is not practical to locate the

instrumented fuel in such a position, the steady state fuel temperature SHALL be calculated by a ratio based on the calculated linear relationship between the normalized power at the monitored position as compared to normalized power at the core position representative of the MEPD in that loading. In this case, the measured steady state fuel temperature SHALL be limited such that the calculated steady state fuel temperature at the core position representative of the MEPD in that loading SHALL NOT exceed 650°C.

a. Thermal and hydraulic calculations and operational experience indicate that a compact TRIGA reactor core can be safely operated up to power levels of at least 1.15 MW (thermal) with natural convective cooling.

- b. Operation at 1.1 MW (thermal) is within the bounds established by the SAR for steady state operations. See Chapter 13, Section C of the SAR.
- c. Limiting the maximum steady state measured fuel temperature of any position to 650°C places an upper bound on the fission product release fraction to that used in the analysis of a Maximum Hypothetical Accident (MHA). See Safety Analysis Report, Chapter 13.

3.1.2 <u>Reactivity Limitation</u>

Applicability

This specification applies to the reactivity condition of the reactor and the reactivity worth of control rods, experiments, and experimental facilities. It applies to all modes of operation.

Objective

The objective is to ensure that the reactor is operated within the limits analyzed in the Safety Analysis Report and to ensure that the safety limit will not be exceeded.

Specification

- a. The maximum excess reactivity above cold, clean, critical plus samarium poison of the core configuration with experiments and experimental facilities in place SHALL be $4.9\% \Delta k/k$ (~\$7.00).
- b. During initial measurements of maximum excess reactivity for a new core/experimental configuration this specification is suspended provided the reactor is operated at power levels no greater than 1 kW. If the power level exceeds 1 kW, power SHALE be reduced to less than 1 kW within one minute. This exemption does not apply for the annual confirmatory measurement of excess reactivity required by TS 4.1.2.

Limiting the excess reactivity of the core to $4.9\% \Delta k/k$ (~\$7.00) prevents the fuel temperature in the core from exceeding 1150°C under any assumed accident condition as described in the Safety Analysis Report, Chapter 13. The exemption allows the initial physics measurement of maximum excess reactivity for a new core/experimental configuration to be measured without creating a reportable occurrence. Maintaining the power level less that 1 kW during this exemption assures there is no challenge to the safety limit on fuel temperature.

3.1.3 Shutdown Margin

Applicability

This specification applies to the reactivity condition of the reactor and the reactivity worth of control rods, experiments, and experimental facilities. It applies to all modes of operation.

Objective

The objective is to ensure that the reactor can be shut down at all times and to ensure that the safety limit will not be exceeded.

Specification

Basis

The reactor SHALL NOT be operated unless the shutdown margin provided by control rods is greater than $0.175\% \Delta k/k (\approx $0.25)$ with:

- a. All movable experiments, experiments with movable parts and experimental facilities in their most reactive state, and
- b. The highest reactivity worth control rod fully withdrawn.

A shutdown margin of 0.175% Ak/k (~\$0.25) ensures that the reactor can be made subcritical from any operating condition even if the highest worth control rod should remain in the fully withdrawn position. The shutdown margin requirement may be more restrictive than TS 3.1.2.

3.1.4 Pulse Mode Operation

Applicability

These specifications apply to the energy generated in the reactor as a result of a pulse insertion of reactivity.

Objective

The objective is to ensure that the safety limit will not be exceeded during pulse mode operation.

Specifications

a. The stepped reactivity insertion for pulse operation SHALL NOT exceed 2.45% $\Delta k/k$ (~\$3.50) and the maximum worth of the poison section of the transient rod SHALL be limited to 2.45% $\Delta k/k$ (~\$3.50).

b. Pulses SHALL NOT be initiated from power levels above 1 kW.

Basis

a. Experiments and analyses described in the Safety Analysis Report, Chapter 13, show that the peak pulse temperatures can be predicted for new 12 wt% fuel placed in any core position. These experiments and analyses show that the maximum allowed pulse reactivity of 2.45% $\Delta k/k$ (~\$3.50), prevents the maximum fuel temperature from reaching the safety limit (1150°C) for any

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- core configuration that meets the requirements of TS 3.1.5.
- The maximum worth of the pulse rod is limited to 2.45% $\Delta k/k$ (~\$3.50) to prevent exceeding the safety limit (1150°C) with an accidental ejection of the transient rod.
- b. If a pulse is initiated from power levels below 1 kW, the maximum allowed full worth of the pulse rod can be used without exceeding the safety limit.

3.1.5 Core Configuration Limitation

Applicability

These specifications apply to all core configurations except as noted.

Objective

The objective is to ensure that the safety limit (1150°C) will not be exceeded due to power peaking effects in the various core configurations.

Specifications

Basis

- a. The critical core SHALL be an assembly of either 8.5 wt% U-ZrH stainless steel clad or a mixture of 8.5 wt% and 12 wt% U-ZrH stainless steel clad TRIGA fuel-moderator elements placed in water with a 1.7-inch center line grid spacing.
- b. The maximum calculated MEPD SHALL be less that 24.7 kW per fuel element for non-pulse operation.
- c. The NP of any core loading with a maximum allowed pulse worth of 2.45% $\Delta k/k$ (~\$3.50) SHALL be limited to 2.2. IF the maximum allowed pulse worth is less than 2.45% $\Delta k/k$ (\$~3.50) for any given core loading (i.e. the pulse can be limited by the total worth of the transient rod, by the core excess, or administratively), THEN the maximum NP may be increased above 2.2 as long as the calculated maximum fuel temperature does not exceed the safety limit with that maximum allowed pulse worth and NP.
- d. IF the maximum NP is increased above 2.2 as described in TS 3.1.5.c above, THEN the Insertion of Excess Reactivity analysis in the Safety Analysis
 Report SHALL be evaluated to ensure that the safety limit is not exceeded with the new conditions (See Safety Analysis Report, Chapter 13.1.2.).
- e. The core SHALL NOT be configured such that a 12 wt% U-ZrH stainless steel clad TRIGA fuel-moderator element with a burnup less than a nominal 8000 MWD/Metric Ton of Uranium is located adjacent to a vacant (water-filled) internal core position during pulse mode operation.
- a. The safety analysis is based on an assembly of either 8.5 wt% U-ZrH stainless steel clad or a mixture of 8.5 wt% and 12 wt% U-ZrH stainless steel clad TRIGA fuel-moderator elements placed in water with a 1.7-inch center line grid spacing.
- b. Limiting the MEPD to 24.7 kW per element for non-pulse operation places an upper bound on the elemental heat production and the source term of the PSBR to that used in the analysis of a Loss Of Coolant Accident (LOCA) and Maximum Hypothetical Accident (MHA) respectively. See Safety Analysis Report, Chapter 13.
- c. The maximum NP for a given core loading determines the peak pulse temperature with the maximum allowed pulse worth. If the maximum

allowed pulse worth is reduced the maximum NP may be increased without exceeding the safety limit (1150°C). The amount of increase in the maximum NP allowed SHALL be calculated by an accepted method documented by an administratively approved procedure.

- d. If the core loading deviates from the limits set in TS 3.1.5.c then revalidation of the Insertion of Excess Reactivity analysis in the Safety Analysis Report will ensure that the new loading does not inadvertently exceed the safety limit (See Safety Analysis Report, Chapter 13.1.2.).
- e. Radial peaking effects in unirradiated 12 wt% U-ZrH stainless steel clad TRIGA fuel-moderator elements located adjacent to water-filled internal core position may cause a reduction in the safety margin during pulse mode operation with the maximum allowed pulse worth of 2.45% $\Delta k/k$ (~\$3.50) and the maximum allowed NP of 2.2. Locating an 8.5 wt% or moderately-irradiated (~8000 Megawatt Days per Metric Ton of Uranium) 12 wt% U-ZrH stainless steel clad TRIGA fuel-moderator element adjacent to vacant water-filled internal core positions provides additional safety margin. 12 wt% elements in the periphery of the core are not subject to this concern as the NP is too low to make these elements limiting.
- 3.1.6 TRIGA Fuel Elements

<u>Applicability</u>

Specifications

These specifications apply to the mechanical condition of the fuel.

<u>Objective</u>

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The objective is to ensure that the reactor is not operated with damaged fuel that might allow release of fission products.

The reactor SHALL NOT be operated with damaged fuel except to detect and identify the fuel element for removal. A TRIGA fuel element SHALL be considered damaged and SHALL be removed from the core if:

- a. In measuring the transverse bend, the bend exceeds the limit of 0.125 inch over the length of the cladding.
- b. In measuring the elongation, its length exceeds its original length by 0.125 inch.
- c. A clad defect exists as indicated by release of fission products.

<u>Basis</u>

- a. The limit of transverse bend has been shown to result in no difficulty in disassembling the core. Analysis of the removal of heat from touching fuel elements shows that there will be no hot spots which cause damage to the fuel.
- b. Experience with TRIGA reactors has shown that fuel element bending that could result in touching has occurred without deleterious effects. This is because (1) during steady state operation, the maximum fuel temperatures are at least 500°C below the safety limit (1150°C), and (2) during a pulse, the cladding temperatures remain well below their stress limit. The elongation limit has been specified to ensure that the cladding material will not be subjected to strains that could cause a loss of fuel integrity and to ensure adequate coolant flow.

3.2 Reactor Control and Reactor Safety System

3.2.1 Reactor Control Rods

Applicability

This specification applies to the reactor control rods.

<u>Objective</u>

The objective is to ensure that sufficient control rods are operable to maintain the reactor subcritical.

Specification

There SHALL be a minimum of three operable control rods in the reactor core.

<u>Basis</u>

The shutdown margin and excess reactivity specifications require that the reactor can be made subcritical with the most reactive control rod fully withdrawn. This specification helps ensure it.

3.2.2 Manual Control and Automatic Control

Applicability

This specification applies to the maximum reactivity insertion rate associated with movement of a standard control rod out of the core.

Objective

The objective is to ensure that adequate control of the reactor can be maintained during manual and 1, 2, or 3 rod automatic control.

Specification

The rate of reactivity insertion associated with movement of either the regulating, shim, or safety control rod SHALL be NOT greater than 0.63% $\Delta k/k$ (~\$0.90) per second when averaged over full rod travel. If the automatic control uses a combination of more than one rod, the sum of the reactivity of those rods SHALL be not greater than 0.63% $\Delta k/k$ (~\$0.90) per second when averaged over full travel.

Basis

The ramp accident analysis (refer to Safety Analysis Report, Chapter 13) indicates that the safety limit (1150 C) will not be exceeded if the reactivity addition rate is less than 1.75% $\Delta k/k$ (~\$2.50) per second, when averaged over full travel. This specification of 0.63% $\Delta k/k$ (~\$0.90) per second, when averaged over averaged over full travel, is well within that analysis.

accident analysis (refer to Safety Analysis Report, Chapter 13) indicates that the safety limit (1150 °C) will not be exceeded if the reactivity addition rate is less than 1.75% $\Delta k/k$ (~\$2.50) per second, when averaged over full travel. This specification of 0.63% $\Delta k/k$ (~\$0.90) per second, when averaged over full travel, is well within that analysis.

3.2.3 Reactor Control System

Applicability

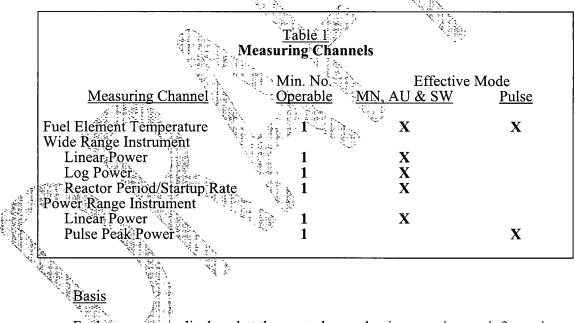
This specification applies to the information which must be available to the reactor operator during reactor operation.

Objective

The objective is to require that sufficient information is available to the operator to ensure safe operation of the reactor.

Specification

The reactor SHALL NOT be operated unless the measuring channels listed in Table 1 are operable. (Note that MN, AU, and SW are abbreviations for manual control mode, automatic control mode, and square wave mode, respectively).



Fuel temperature displayed at the control console gives continuous information on this parameter which has a specified safety limit. The power level monitors ensure that the reactor power level is adequately monitored for the manual control, automatic control, square wave, and pulsing modes of operation. The specifications on reactor power level and reactor period indications are included in this section to provide assurance that the reactor is operated at all times within the limits allowed by these Technical Specifications.

3.2.4 Reactor Safety System and Reactor Interlocks

Applicability

This specification applies to the reactor safety system channels, the reactor interlocks, and the watchdog circuit.

Objective

The objective is to specify the minimum number of reactor safety system channels and reactor interlocks that must be operable for safe operation.

Specification

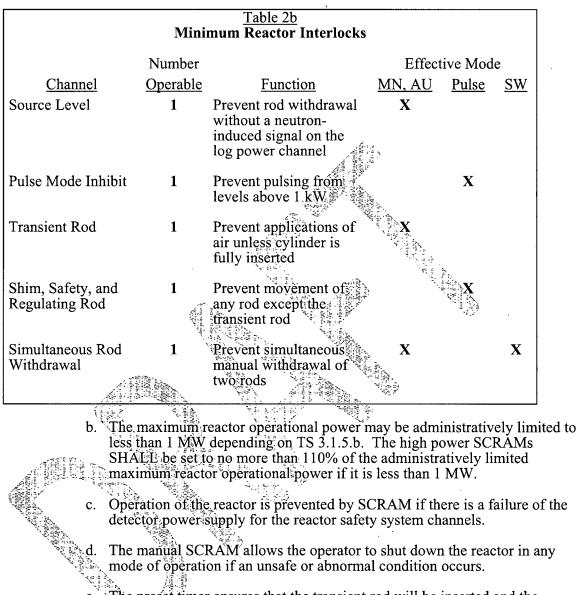
The reactor SHALL NOT be operated unless all of the channels and interlocks described in Table 2a and Table 2b are operable.

Basis

a. A temperature SCRAM and two power-level SCRAMs ensure the reactor is shutdown before the safety limit on the fuel element temperature is reached. The actual setting of the fuel temperature SCRAM depends on the LSSS for that core loading and the location of the instrumented fuel element (see TS 2.2).

			శాశ్రం స్పూజి		
N	/linimum	Table 2a Reactor Safety System C	hannels		
<u>Channel</u> <u>Öperable</u> <u>Function</u>			Effective Mode <u>MN, AU</u> Pulse <u>SW</u>		
Fuel Temperature	1	SCRAM ≤ 650°C*	X	X	X
High Power		SCRAM ≤ 110% of maximum reactor operational power not to exceed 1.1 MW	Х		X
Detector Power Supply	1	SCRAM on failure of supply voltage	X		X
SCRAM Bar on Console	1	Manual SCRAM	X	X	X
Preset Timer	1	Transient Rod SCRAM 15 seconds or less after pulse		X	
Watchdog Circuit	1	SCRAM on software or self-check failure	Х	X	X

The limit of 650°C SHALL be reduced as required by TS 2.2.



- e. The preset timer ensures that the transient rod will be inserted and the reactor will remain at low power after pulsing.
- f. The watchdog circuit will SCRAM the reactor if the software or the selfchecks fail (see Safety Analysis Report, Chapter 7).
- g. The interlock to prevent startup of the reactor without a neutron-induced signal ensures that sufficient neutrons are available for proper startup in all allowable modes of operation.
- h. The interlock to prevent the initiation of a pulse above 1 kW is to ensure that fuel temperature is approximately pool temperature when a pulse is performed. This is to ensure that the safety limit is not reached.

- i. The interlock to prevent application of air to the transient rod unless the cylinder is fully inserted is to prevent pulsing the reactor in the manual control or automatic control mode.
- j. In the pulse mode, movement of any rod except the transient rod is prevented by an interlock. This interlock action prevents the addition of reactivity other than with the transient rod.
- k. Simultaneous manual withdrawal of two rods is prevented to ensure the reactivity rate of insertion is not exceeded.
- 3.2.5 Core Loading and Unloading Operation

Applicability

This specification applies to the source level interlock.

Objective

The objective of this specification is to allow bypass of the source level interlock during operations with a subcritical core.

Specification

During core loading and unloading operations when the reactor is subcritical, the source level interlock may be momentarily defeated using a spring loaded switch in accordance with the fuel loading procedure.



During core loading and unloading, the reactor is subcritical. Thus, momentarily defeating the source level interlock is a safe operation. Should the core become inadvertently supercritical, the accidental insertion of reactivity will not allow fuel temperature to exceed the 1150°C safety limit because no single TRIGA fuel element is worth more than 1% $\Delta k/k$ (~\$1.43) in the most reactive core position.

3.2.6 SCRAM Time

<u>Basıs</u>

<u>Applicability</u>

This specification applies to the time required to fully insert any control rod to a full down position from a full up position.

Objective

The objective is to achieve rapid shutdown of the reactor to prevent fuel damage.

Specification

The time from SCRAM initiation to the full insertion of any control rod from a full up position SHALL be less than 1 second.

<u>Basis</u>

This specification ensures that the reactor will be promptly shut down when a SCRAM signal is initiated. Experience and analysis, Safety Analysis Report, Chapter 13, have indicated that for the range of transients anticipated for a TRIGA reactor, the specified SCRAM time is adequate to ensure the safety of the reactor. If the SCRAM signal is initiated at 1.1 MW, while the control rod is being withdrawn, and the negative reactivity is not inserted until the end of the one second rod drop time, the maximum fuel temperature does not reach the safety limit.

- 3.3 <u>Coolant System</u>
 - 3.3.1 Coolant Level Limits

Applicability

This specification applies to operation of the reactor with respect to a required depth of water above the top of the bottom grid plate.

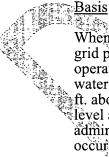
Objective

The objective is to ensure that water is present to provide adequate personnel shielding and core cooling when the reactor is operated, and during a LOCA.

2.5

Specification

The reactor SHALL NOT be operated with less than 18 ft. of water above the top of the bottom grid plate.



When the water is more than approximately 18 ft. above the top of the bottom grid plate, the water provides sufficient shielding to protect personnel during operation at 1 MW, and core cooling is achieved with natural circulation of the water through the core. Should the water level drop below approximately 18.25 ft. above the top of the bottom grid plate while operating at 1 MW, a low pool level alarm (see TS 3.3.2) will alert the operator who is required by administratively approved procedure to shut down the reactor. Once this alarm occurs it will take longer than 1300 seconds before the core is completely uncovered because of a break in the 6" pipe connected to the bottom of the pool. Tests and calculations show that, during a LOCA, 680 seconds is sufficient decay time after shutdown (see Safety Analysis Report, Chapter 13) to prevent the fuel temperature from reaching 950°C. To prevent cladding rupture, the fuel and the cladding temperature must not exceed 950°C (it is assumed that the fuel and the cladding are the same temperature during air cooling).

3.3.2 Detection of Leak or Loss of Coolant

Applicability

This specification applies to detecting a pool water loss.

Objective

The objective is to detect the loss of a significant amount of pool water.

Specification

A pool level alarm SHALL be activated and corrective action taken when the pool level drops 26 cm from a level where the pool is full.

<u>Basis</u>

The alarm occurs when the water level is approximately 18.25 ft. above the top of the bottom grid plate. The point at which the pool is full is approximately 19.1 ft. above the top of the bottom grid plate. The reactor staff SHALL take action to keep the core covered with water according to existing procedures. The alarm is also transmitted to the Police Services annunciator panel which is monitored 24 hrs. a day. The alarm provides a signal that occurs at all times. Thus, the alarm provides time to initiate corrective action before the radiation from the core poses a serious hazard.

3.3.3 Fission Product Activity

Applicability

This specification applies to the detection of fission product activity.

The objective is to ensure that fission products from a leaking fuel element are detected to provide opportunity to take protective action.

Specification

Objective

An air particulate monitor SHALL be operating in the reactor bay whenever the reactor is operating. An alarm actuated by this unit SHALL alert personnel.

<u>Basis</u>

This unit will be sensitive to airborne radioactive particulate matter containing fission products and fission gases and will alert personnel to evaluate the situation and take appropriate protective action.

3.3.4 Pool Water Supply for Leak Protection

Applicability

This specification applies to pool water supplies for the reactor pool for leak protection.

Objective

The objective is to ensure that a supply of water is available to replenish reactor pool water in the event of pool water leakage

Specification

A source of water of at least 100 GPM SHALL be available either from the University water supply or by diverting the heat exchanger secondary flow to the pool.

Basis

Provisions for both of these supplies are in place and will supply more than the specified flow rate. This flow rate will be more than sufficient to handle leak rates that have occurred in the past or any anticipated leak that might occur in the future.

3.3.5 Coolant Conductivity Limits

Applicability

Objectives

This specification applies to the conductivity of the water in the pool.

The objectives are:

a. To prevent activated contaminants from becoming a radiological hazard, and

To help preclude corrosion of fuel cladding and other primary system components.

Specification

The reactor SHALL NOT be operated if the conductivity of the bulk pool water is greater than 5 microsiemens/cm (5 micromhos/cm).

<u>Basis</u>

Experience indicates that 5 microsiemens/cm is an acceptable level of water contaminants in an aluminum/stainless steel system such as that at the PSBR. Based on experience, activation at this level does not pose a significant radiological hazard, and significant corrosion of the stainless steel fuel cladding will not occur when the conductivity is below 5 microsiemens/cm.

3.3.6 Coolant Temperature Limits

Applicability

This specification applies to the pool water temperature.

Objective

The objective is to maintain the pool water temperature at a level that will not cause damage to the demineralizer resins.

Specification

An alarm SHALL annunciate and corrective action SHALL be taken if during operation the bulk pool water temperature reaches 140°F (60°C).

Basis

This specification is primarily to preserve demineralizer resins. Information available indicates that temperature damage will be minimal up to this temperature.

3.4 Confinement

Applicability

This specification applies to the boundary walls and doors that make up the confinement.

Objective

The objective is to define the components and conditions requiring confinement.

Specification

Whenever the reactor is operating or irradiated fuel of a fueled experiment with significant fission product inventory is being moved outside containers, systems or storage areas:

a. Reactor bay doors SHALL be closed or operable, except that the door is continuously attended AND provisions in place to immediately close the door OR establish a low pressure confinement boundary.

AND

b. Large penetrations SHALL NOT exist in the confinement boundary except that the penetration is continuously attended and provisions in place to immediately close the penetration or establish a low pressure confinement boundary

Basis

During reactor operation or a of movement of irradiated fuel or fueled experiments, the probability of fission product release increases. This specification ensures that the reactor bay boundary is intact to ensure that a controlled air flow passage can exist to meet the definition of confinement during these times. Controlled air flow is maintained by one or more exhaust system fans and ensures controlled release of any airborne radioactivity (see TS 3.5 Ventilation). For the purpose of this specification, the confinement includes the reactor bay, low bay and control room (if the control room door is blocked open).

a. Large open penetrations can disrupt the flow of ventilation. Except for the attended passage of people or equipment, doors shall remain closed. A door is operable when it is closed or capable of closing via an automatic closure mechanism. To be operable, a blocked door or manual door must be attended to ensure that in an event that requires closure, it can and will be closed. If a door is inoperable or under maintenance, a temporary low pressure confinement or alternative boundary can be established. Temporary or alternative boundaries should be verified acceptable by the Senior Reactor Operator. An established low pressure boundary that satisfies this specification may or may not meet the requirement of the Physical Security Plan. The existing doors include the reactor bay personnel doors, reactor bay rollup or exterior weather door, low bay equipment doors, and the pipe tunnel boundary partition/door. The low bay equipment doors include the Hot Cell Access plugs.

b. Temporary penetrations may be established in the confinement for ongoing maintenance and modifications. Whenever such penetrations exist, a low pressure confinement boundary should be established or a designated individual assigned with all necessary provisions in place to close the penetration. Provisions and preparations for low pressure boundaries should be verified acceptable by the Senior Reactor Operator. The high flow rate of the exhaust systems will maintain air flow into the confinement even with relatively large penetrations. A large penetration is defined as any penetration greater than approximately 100 square inches and is limited by security, not air flow considerations.

3.5 Ventilation Systems

Applicability

This specification applies to the operation of the reactor bay heating ventilation air conditioning and exhaust system and the emergency exhaust system.

Objective

The objective is to mitigate the consequences of the release of airborne radioactive materials resulting from reactor operation.

Specification

a. Whenever the reactor is operating, at least one reactor bay exhaust fan SHALL be operating AND, except for periods of time less than 30 days[MAT2] during maintenance or repair, the emergency exhaust system SHALL be operable.

With no operating exhaust fans, restore an exhaust fan to operation within 1 hour or shutdown the reactor.

Whenever irradiated fuel or a fueled experiment with significant fission product inventory is being moved outside containers, systems or storage areas, at least one reactor bay exhaust fan SHALL be operating AND the emergency exhaust system SHALL be operable.

With no operating exhaust fans or discovery of an inoperable emergency exhaust system, complete the movement in progress then cease all further movement until compliance with 3.5.b is restored.

<u>Basis</u>

a. During normal operation, the concentration of airborne radioactivity in unrestricted areas is below effluent release limits as described in the Safety Analysis Report, Chapter 13. The operation of any of the reactor bay exhaust fans (reactor bay heating ventilation air conditioning and exhaust system or the emergency exhaust system) will maintain this condition and provide confinement per TS 1.1.8. If all exhaust to the reactor bay is temporarily lost, the 1 hour time limit to restore exhaust allows operators to investigate and respond. Reactor bay area radiation and/or air radiation monitors will continue to assure an unrecognized hazardous condition does not develop.

In the event of a substantial release of airborne radioactivity, an air radiation monitor and/or an area radiation monitor will alert personnel and lead to initiation of the building evacuation alarm which will automatically cause the reactor bay heating ventilation air conditioning and exhaust system to shutdown. The emergency exhaust system will start and the exhausted air will be passed through the emergency exhaust system filters before release. This reduces the radiation within the building. The filters will remove $\approx 90\%$ all of the particulate fission products that escape to the atmosphere.

The emergency exhaust system activates during an evacuation whereupon all personnel are required to evacuate the building (TS 3.6.2). If there is an evacuation while the emergency exhaust system is out of service for maintenance or repair, personnel evacuation is not prevented.

In the unlikely event an accident occurs during emergency exhaust system maintenance or repair, the public dose will be equivalent to or less than that calculated in the Safety Analysis Report, Chapter 13 as this analyses does not take credit for the filtration provided by emergency exhaust system. Therefore the system filtration and operation is not required to meet the accident analysis and a 30 day repair period is mandated or operations will cease.

b. During irradiated fuel or fueled experiment movement, the likelihood of event releasing fission products to the bay is increased. Therefore operation of the exhaust system and availability of an operable filtered exhaust prudent. If the system fails or is discovered inoperable during movement activities, the movement in progress must be completed to store the fuel or experiment in an approved location. This is prudent and remains within the requirement of the limiting condition for operation remedial action. No further movements may be conducted until the limiting condition for operation is satisfied.



3.6 Radiation Monitoring System and Evacuation Alarm

3.6.1 Radiation Monitoring

Applicability

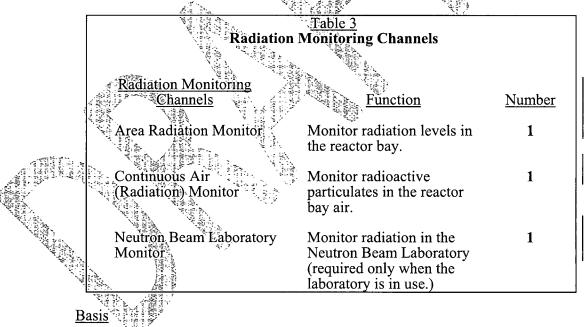
This specification applies to the radiation monitoring information which must be available to the reactor operator during reactor operation.

Objective

The objective is to ensure that sufficient radiation monitoring information is available to the operator to ensure personnel radiation safety during reactor operation.

Specification

The reactor SHALL NOT be operated unless the radiation monitoring channels listed in Table 3 are operating.



- a. The radiation monitors provide information to operating personnel of any impending or existing danger from radiation so that there will be sufficient time to evacuate the facility and to take the necessary steps to control the spread of radioactivity to the surroundings.
- b. The area radiation monitor in the Neutron Beam Laboratory provides information to the user and to the reactor operator when this laboratory is in use.

3.6.2 Evacuation Alarm

Applicability

This specification applies to the evacuation alarm.

Objective

The objective is to ensure that all personnel are alerted to evacuate the PSBR building when a potential radiation hazard exists within this building.

Specification

The reactor SHALL NOT be operated unless the evacuation alarm is operable and audible to personnel within the PSBR building when activated by the radiation monitoring channels in Table 3 or a manual switch.

With no operable evacuation alarm system, within 1 hour return the evacuation alarm to operation or verify that an evacuation can be initiated using the facility announcement system or other audible alarm.

Basis

The evacuation alarm system produces a audible alarm throughout the PSBR building when activated. The alarm notifies all personnel within the PSBR building to evacuate the building as prescribed by the PSBR emergency procedure.



Since the probability of a valid need for a full facility evacuation is very low and areas of the building that have significant sources of radiation have local alarms, it is reasonable that the evacuation system may be removed from service for maintenance and testing without ceasing reactor operations. The one hour time limit allows for routine maintenance and testing. Verification of a suitable substitute alarm or a functioning facility announcement system will ensure the facility can be evacuated in accordance with emergency procedures and allow for longer maintenance intervals if required.

3.7 Limitations of Experiments

Applicability

These specifications apply to experiments installed in the reactor and its experimental facilities.

Objective

The objective is to prevent damage to the reactor and to minimize release of radioactive materials in the event of an experiment failure.

Specifications

The reactor SHALL NOT be operated unless the following conditions governing experiments exist:

- a. The reactivity of a movable experiment and/or movable portions of a secured experiment plus the maximum allowed pulse reactivity SHALL be less than 2.45% $\Delta k/k$ (~\$3.50). However, the reactivity of a movable experiment and/or movable portions of a secured experiment SHALL have a reactivity worth less than 1.4% $\Delta k/k$ (~\$2.00). During measurements made to determine specific worth, this specification is suspended provided the reactor is operated at power levels no greater than 1 kW. When a movable experiment is used, the maximum allowed pulse SHALL be reduced below the allowed pulse reactivity insertion of 2.45% $\Delta k/k$ (~\$3.50) to ensure that the sum is less 2.45% $\Delta k/k$ (~\$3.50).
- b. A single secured experiment SHALL be limited to a maximum of 2.45% $\Delta k/k$ (~\$3.50). The sum of the reactivity worth of all experiments SHALL be less than 2.45% $\Delta k/k$ (~\$3.50). During measurements made to determine experimental worth, this specification is suspended provided the reactor is operated at power levels no greater that 1 kW:



When the keff of the core is less than 1 (one) with all control rods at their upper limit and no experiments in or near the core, secured negative reactivity experiments may be added without limit.

d. An experiment may be irradiated or an experimental facility may be used in conjunction with the reactor provided its use does not require a license amendment, as described in 10 CFR 50.59, "Changes, Tests and Experiments." The failure mechanisms that SHALL be analyzed include, but are not limited to corrosion, overheating, impact from projectiles, chemical, and mechanical explosions.

Explosive material SHALL NOT be stored or used in the facility without proper safeguards to prevent release of fission products or loss of reactor shutdown capability.

If an experimental failure occurs which could lead to the release of fission products or the loss of reactor shutdown capability, physical inspection SHALL be performed to determine the consequences and the need for corrective action. The results of the inspection and any corrective action taken SHALL be reviewed by the Director or a designated alternate and determined to be satisfactory before operation of the reactor is resumed.

e. Experiment materials, except fuel materials, which could off-gas, sublime, volatilize, or produce aerosols under (1) normal operating conditions of the experiment and reactor, (2) credible accident conditions in the reactor, or (3) possible accident conditions in the experiment, SHALL be limited in activity such that the airborne concentration of radioactivity averaged over a year SHALL NOT exceed the limit of Appendix B Table 2 of 10 CFR Part 20.

When calculating activity limits, the following assumptions SHALL be used:

- If an experiment fails and releases radioactive gases or aerosols to the reactor bay or atmosphere, 100% of the gases or aerosols escape.
- 2) If the effluent from an experimental facility exhausts through a holdup tank which closes automatically on high radiation level, at least 10% of the gaseous activity or aerosols produced will escape.
- 3) If the effluent from an experimental facility exhausts through a filter installation designed for greater than 99% efficiency for 0.3 micron particles, at least 10% of these vapors can escape.
- 4) For materials whose boiling point is above 130°F and where vapors formed by boiling this material can escape only through an undisturbed column of water above the core, at least 10% of these vapors can escape.
- f. Each fueled experiment SHALL be controlled such that the total inventory of iodine isotopes 131 through 135 in the experiment is no greater than 1.5 curies. In addition, any fueled experiment which would generate an inventory of more than 5 millicuries (mCi) of 1.131 through 1.135 SHALL be reviewed to ensure that in the case of an accident, the total release of iodine will not exceed that postulated for the MHA (see Safety Analysis Report, Chapter 13).

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<u>Basis</u>

- a. This specification limits the sum of the reactivities of a maximum allowed pulse and a movable experiment to the specified maximum reactivity of the transient rod. This limits the effects of a pulse simultaneous with the failure of the movable experiment to the effects analyzed for a 2.45% $\Delta k/k$ (~\$3.50) pulse. In addition, the maximum power attainable with the ramp insertion of 1.4% $\Delta k/k$ (~\$2.00) is less than 500 kW starting from critical.
- b. The maximum worth of all experiments is limited to 2.45% $\Delta k/k$ (~\$3.50) so that their inadvertent sudden removal from the cold critical reactor will not result in the reactor achieving a power level high enough to exceed the temperature safety limit (1150°C). The worth of a single secured experiment is limited to the allowed pulse reactivity insertion as an increased measure of safety. Should the 2.45% $\Delta k/k$, (~\$3.50) reactivity be inserted by a ramp increase, the maximum power attainable is less than 1 MW.
- c. Since the initial core is subcritical, adding and then inadvertently removing all negative reactivity experiments leaves the core in its initial subcritical condition.
- d. The design basis accident is the MHA (See Safety Analysis Report, Chapter 13). A chemical explosion (such as detonated TNT) or a mechanical explosion (such as a steam explosion or a high pressure gas container explosion) may release enough energy to cause release of fission products or loss of reactor shutdown capability. A projectile with a large amount of kinetic energy could cause release of fission products or loss of reactor shutdown of the fuel cladding due to material released by a failed experiment could also lead to release of fission products.

If an experiment failure occurs a special investigation is required to ensure that all effects from the failure are known before operation proceeds.

This specification is intended to reduce the likelihood that airborne activities in excess of the limits of Appendix B Table 2 of 10 CFR Part 20 will be released to the atmosphere outside the facility boundary.

The 5 mCi limitation on I-131 through I-135 ensures that in the event of failure of a fueled experiment, the exposure dose at the exclusion area boundary will be less than that postulated for the MHA (See Safety Analysis Report, Chapter 13) even if the iodine is released in the air.

4.0 SURVEILLANCE REQUIREMENTS

IF a Surveillance Requirement(s) is not accomplished in the specified interval that prohibits reactor operation; **THEN** the reactor SHALL NOT be operated until the Surveillance Requirement(s) is satisfied EXCEPT as required to accomplish the required Surveillance(s).

4.1 <u>Reactor Core Parameters</u>

4.1.1 Reactor Power Calibration

Applicability

This specification applies to the surveillance of the reactor power calibration.

Objective

The objective is to verify the performance and operability of the power measuring channel.

Specification

A thermal power channel calibration SHALL be made on the linear power level monitoring channel biennially, not to exceed 30 months.

Basis

Applicability

Objective

The thermal power level channel calibration will ensure that the reactor is operated at the authorized power levels.

4.1.2 <u>Reactor Excess Reactivity</u>

This specification applies to surveillance of core excess reactivity.

The objective is to ensure that the reactor excess reactivity does not exceed the Technical Specifications and the limit analyzed in Safety Analysis Report, Chapter 13

Specification

The excess reactivity of the core SHALL be measured annually, not to exceed 15 months, and following core or control rod changes equal to or greater than $0.7\% \Delta k/k$ (~\$1.00).

<u>Basis</u>

Excess reactivity measurements on this schedule ensure that no unexpected changes have occurred in the core and the core configuration does not exceed excess reactivity limits established in the TS 3.1.2.

4.1.3 TRIGA Fuel Elements

Applicability

This specification applies to the surveillance requirements for the TRIGA fuel elements.

Objective

The objective is to verify the continuing integrity of the fuel element cladding.

Specification

Fuel elements and control rods with fuel followers SHALL be inspected visually for damage or deterioration and measured for length and bend in accordance with the following:

- a. Before being placed in the core for the first time or before return to service.
- b. Every two years, not to exceed 30 months, or at intervals not to exceed the sum of \$3,500 in pulse reactivity, whichever comes first, for elements with a NP greater than 1 (one) and for control rods with fueled followers.

c. Every four years, not to exceed 54 months, for elements with a NP of 1 (one) or less.

Basis

d. Upon being removed from service. Those removed from service are then exempt from further inspection.

The frequency of inspection and measurement schedule is based on the parameters most likely to affect the fuel cladding of a pulsing reactor operated at moderate pulsing levels and utilizing fuel elements whose characteristics are well known.

4.2 Reactor Control and Reactor Safety System

4.2.1 <u>Reactivity Worth</u>

Applicability

This specification applies to the reactivity worth of the control rods.

Objective

The objective is to ensure that the control rods are capable of maintaining the reactor subcritical.

Specification

The reactivity worth of each control rod and the shutdown margin for the core loading in use SHALL be determined annually, not to exceed 15 months, or following core or control rod changes equal to or greater than $0.7\% \Delta k/k$ (~\$1.00).

Basis

The reactivity worth of the control rod is measured to ensure that the required shutdown margin is available and to provide an accurate means for determining the core excess reactivity maximum reactivity, reactivity insertion rates, and the reactivity worth of experiments inserted in the core.

4.2.2 Reactivity Insertion Rate

Applicability [

Objective

This specification applies to control rod movement speed.

The objective is to ensure that the reactivity addition rate specification is not violated and that the control rod drives are functioning.

Specification

The rod drive speed both up and down and the time from SCRAM initiation to the full insertion of any control rod from the full up position SHALL be measured annually, not to exceed 15 months, or when any significant work is done on the rod drive or the rod.

<u>Basis</u>

This specification ensures that the reactor will be promptly shut down when a SCRAM signal is initiated. Experience and analysis have indicated that for the range of transients anticipated for a TRIGA reactor, the specified SCRAM time is adequate to ensure the safety of the reactor. It also ensures that the maximum reactivity addition rate specification will not be exceeded.

4.2.3 Reactor Safety System

Applicability

The specifications apply to the surveillance requirements for measurements, channel tests, and channel checks of the reactor safety systems and watchdog circuit.

Objective

The objective is to verify the performance and operability of the systems and components that are directly related to reactor safety.

Specifications

Basis

- a. A channel test of the SCRAM function of the wide range linear, power range linear, fuel temperature, manual, and preset timer safety channels SHALL be made on each day that the reactor is to be operated, or prior to each operation that extends more than one day.
- b. A channel test of the detector power supply SCRAM functions for both the wide range and the power range and the watchdog circuit SHALL be performed annually, not to exceed 15 months.
- c. Channel checks for operability SHALL be performed daily on fuel element temperature, wide range linear power, wide range log power, wide range
- reactor period/SUR, and power range linear power when the reactor is to be operated, or prior to each operation that extends more than one day.
- d. The power range channel SHALL be compared with other independent channels for proper channel indication, when appropriate, each time the reactor is operated.
- e. The pulse peak power channel SHALL be compared to the fuel temperature each time the reactor is pulsed, to ensure proper peak power channel operation.
- System components have proven operational reliability.
- a. Daily channel tests ensure accurate SCRAM functions and ensure the detection of possible channel drift or other possible deterioration of operating characteristics.
- b. An annual channel test of the detector power supply SCRAM will ensure that this system works, based on past experience as recorded in the operation log book. An annual channel test of the watchdog circuit is sufficient to ensure operability.
- c. The channel checks will make information available to the operator to ensure safe operation on a daily basis or prior to an extended run.

- d. Comparison of the percent power channel with other independent power channels will ensure the detection of channel drift or other possible deterioration of its operational characteristics.
- e. Comparison of the peak pulse power to the fuel temperature for each pulse will ensure the detection of possible channel drift or deterioration of its operational characteristics.
- 4.2.4 <u>Reactor Interlocks</u>

Applicability

These specifications apply to the surveillance requirements for the reactor control system interlocks.

Objective

The objective is to ensure performance and operability of the reactor control system interlocks.

Specifications

- a. A channel check of the source interlock SHALL be performed each day that the reactor is operated or prior to each operation that extends more than one day except when the neutron signal is greater than the setpoint when the source is removed from the core
- b. A channel test SHALL be performed semi-annually, not to exceed 7 1/2 months, on the pulse mode inhibit interlock which prevents pulsing from power levels higher than one kilowatt.
 - A channel check SHALL be performed semi-annually, not to exceed 7 1/2 months, on the transient rod interlock which prevents application of air to the transient rod unless the cylinder is fully inserted.
- d. A channel check SHALL be performed semi-annually, not to exceed 7 1/2 months, on the rod drive interlock which prevents movement of any rod except the transient rod in pulse mode.
- e. A channel check SHALL be performed semi-annually, not to exceed 7 1/2 months; on the rod drive interlock which prevents simultaneous manual withdrawal of more than one rod.

<u>Basis</u>

The channel test and checks will verify operation of the reactor interlock system. Experience at the PSBR indicates that the prescribed frequency is adequate to ensure operability.

After extended operation, the photo neutron source strength may be high enough that removing the source may not drop the neutron signal below the setpoint of the source interlock. With a large intrinsic source there is no practical way to channel check the source interlock. In this case there is no need for a source interlock.

4.2.5 Overpower SCRAM

Applicability

This specification applies to the high power and fuel temperature SCRAM channels.

Objective

The objective is to verify that high power and fuel temperature SCRAM channels perform the SCRAM functions.

Specification

The high power and fuel temperature SCRAMs SHALL be tested annually, not to exceed 15 months.

Experience with the PSBR for more than a decade, as recorded in the operation log books, indicates that this interval is adequate to ensure operability.

Transient Rod Test

Applicability

These specifications apply to surveillance of the transient rod mechanism.

<u>Objective</u>

The objective is to ensure that the transient rod drive mechanism is maintained in an operable condition.

Specifications

- a. The transient rod system SHALL be verified operable on each day that the reactor is pulsed.
- b. The transient rod drive cylinder and the associated air supply system SHALL be inspected, cleaned, and lubricated as necessary, and at least annually, not to exceed 15 months.
- c. The reactor SHALL be pulsed annually, not to exceed 15 months, to compare fuel temperature measurements and peak power levels with those of previous pulses of the same reactivity value or the reactor SHALL NOT be pulsed until such comparative pulse measurements are performed.

Basis

Functional checks along with periodic maintenance ensure repeatable performance. The reactor is pulsed at suitable intervals and a comparison made with previous similar pulses to determine if changes in transient rod drive mechanism, fuel, or core characteristics have taken place.

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4.3 Coolant System
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4.3.1 <u>Fire Hose Inspection</u>

Applicability :

Objective

Specification

This specification applies to the dedicated fire hoses used to supply water to the pool in an emergency.

The objective is to ensure that these hoses are operable.

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The two (2) dedicated fire hoses that provide supply water to the pool in an emergency SHALL be visually inspected for damage and wear annually, not to exceed 15 months.

Basis

This frequency is adequate to ensure that significant degradation has not occurred since the previous inspection.

4.3.2 Pool Water Temperature

Applicability

This specification applies to pool water temperature.

Objective

The objective is to limit pool water temperature.

Specification

The pool temperature alarm SHALE be calibrated annually, not to exceed 15 months.

<u>Basis</u>

Experience has shown this instrument to be drift-free and that this interval is adequate to ensure operability.

4.3.3 Pool Water Conductivity

Applicability

This specification applies to surveillance of pool water conductivity.

<u>Objective</u>

Specification

Basis

The objective is to ensure that pool water mineral content is maintained at an acceptable level.

Pool water conductivity SHALL be measured and recorded daily when the reactor is to be operated or at monthly intervals when the reactor is shut down for this time period.

Based on experience, observation at these intervals provides acceptable surveillance of limits that ensure that fuel clad corrosion and neutron activation of dissolved materials will not occur.

4.3.4 Pool Water Level Alarm

Applicability

This specification applies to the surveillance requirements for the pool level alarm.

<u>Objective</u>

The objective is to verify the operability of the pool water level alarm.

Specification

The pool water level alarm SHALL be channel checked monthly, not to exceed 6 weeks, to ensure its operability

Basis

Experience, as exhibited by past periodic checks, has shown that monthly checks of the pool water level alarm ensures operability of the system during the month.

4.4 <u>Confinement</u>

Applicability

This specification applies to reactor bay doors and penetrations.

Objective

The objective is to ensure that reactor bay doors and penetrations are maintained operable per TS 3.4.

Specification

A verification that reactor confinement doors and temporary penetrations comply with TS 3.4 SHALL be made on each day that the reactor is to be operated, or prior to each operation that extends more than one day..

Basis

The operability status of reactor bay doors is commonly observed by the users of the door throughout each day. The existence of temporary penetration is an unusual maintenance event. The failure of a door to properly close will not result in an increase in the likelihood or severity of a release. Therefore a daily check of the door and penetration status is more than adequate to assure confinement function.

4.5 Ventilation Systems

Applicability

These specifications apply to the reactor bay heating ventilation air conditioning and exhaust system and emergency exhaust system.

Objective

The objective is to ensure the proper operation of the reactor bay heating ventilation air conditioning and exhaust system and emergency exhaust system in controlling releases of radioactive material to the uncontrolled environment.

Specifications

- a. It SHALL be verified monthly, not to exceed 6 weeks, whenever operation is scheduled, that the emergency exhaust system is operable with correct pressure drops across the filters (as specified in procedures).
- b. It SHALL be verified monthly, not to exceed 6 weeks, whenever operation is scheduled, that the reactor bay heating ventilation air conditioning and exhaust system is isolated when the emergency exhaust system activates during an evacuation alarm (See TS 3.6.2 and TS 5.5).

<u>Basis</u>

Experience, based on periodic checks performed over years of operation, has demonstrated that a test of the exhaust systems on a monthly basis, not to exceed 6 weeks, is sufficient to ensure the proper operation of the systems. This provides reasonable assurance on the control of the release of radioactive material.

4.6 Radiation Monitoring System and Evacuation Alarm

4.6.1 Radiation Monitoring System

Applicability

This specification applies to surveillance requirements for the reactor bay area radiation monitor, the neutron beam laboratory area radiation monitor, and the reactor bay continuous air radiation monitor.

Objective

The objective is to ensure that the radiation monitors are operable and to verify the appropriate alarm settings.

Specification

The area radiation monitor, the neutron beam laboratory radiation monitor, and the continuous air (radiation) monitor SHALL be

- a. Verified operable (whenever the monitor is required to be in service per T.S. 3.6.1) by a channel check each day that the reactor is operated or prior to each operation that extends more than one day;
- b. Channel tested monthly, not to exceed 6 weeks, whenever operations are scheduled;
- c. Calibrated annually, not to exceed 15 months, whenever operations are scheduled.

A daily channel check when the monitor is required to be in service is prudent and adequate to ensure personnel protection. Additionally, experience has shown this frequency of verification of the radiation monitor set points and operability is adequate to correct for any variation in the system due to a change of operating characteristics. Annual channel calibration ensures that units are within the specifications defined by procedures. If no operations are scheduled, then calibration and testing intervals are not applicable.

4.6.2 **Evacuation Alarm** Applicability

Basis

This specification applies to the emergency evacuation alarm.

Objective

The objective is to ensure that the emergency alarm is audible when actuated automatically or via a manual switch.

Specification

The evacuation alarm SHALL be verified audible annually not to exceed 15 months.

<u>Basis</u>

During an abnormal radiation event an evacuation alarm is transmitted through the building via the public address system or the life safety fire panel. The public address system is frequently used for information paging and malfunction is readily apparent. The life safety fire alarm system is maintained in accordance with building codes and is highly reliable with backup power and automated trouble identification. This specification works in conjunction with specification 4.6.1 to comprehensively test the alarm system with this specification only testing the enunciators. Therefore annual testing of the audible enunciator is adequate to verify the alarm function.

4.7 Experiments

Applicability

This specification applies to surveillance requirements for experiments.

Objective

The objective is to ensure that the conditions and restrictions of TS 3.7 are met.

Specification

Those conditions and restrictions listed in TS 3.7 SHALL be considered by the PSBR authorized reviewer before signing the irradiation authorization for each experiment.

<u>Basis</u>

Authorized reviewers are appointed by the facility director.

5.0 **DESIGN FEATURES**

5.1 <u>Reactor Fuel</u>

Specifications

The individual unirradiated TRIGA fuel elements shall have the following characteristics:

- a. The total uranium content SHALL be either 8.5 wt% or 12.0 wt% nominal and enriched to less than 20% uranium-235.
- b. The hydrogen-to-zirconium atom ratio (in the ZiHx) SHALL be a nominal 1.65 H atoms to 1.0 Zr atom.
- c. The cladding SHALL be 304 stainless steel with a nominal 0.020 inch thickness.

Basis

Nominal values of uranium loading, U-235 enrichment, hydrogen loading and cladding thickness are taken to mean those values specified by the manufacturer as standard values for TRIGA fuel. Minor deviations about these levels may occur due to variations in manufacturing and are not considered to be violations of this specification.

5.2 <u>Reactor Core</u>

Specifications

a. The core SHALL be an arrangement of TRIGA uranium-zirconium hydride fuelmoderator elements positioned in the reactor grid plates.

b. The reflector, excluding experiments and experimental facilities, SHALL be water, or D₂O, or graphite, or any combination of the three moderator materials.

The arrangement of TRIGA fuel elements positioned in the reactor grid plates ensures that adequate space is maintained for effective cooling. The Mark III TRIGA reactor is an open design without provision for reflector except in the form of natural water used for cooling and graphite elements which may be placed in the grid array. Restrictions on the reflector in this specification ensure any changes are analyzed against the criteria for experiments consistent with TS 3.7.

5.3 Control Rods

Specifications

- a. The shim, safety, and regulating control rods SHALL have SCRAM capability and contain borated graphite, B4C powder, or boron and its compounds in solid form as a poison in stainless steel or aluminum cladding. These rods may incorporate fueled followers which have the same characteristics as the fuel region in which they are used.
- b. The transient control rod SHALL have SCRAM capability and contain borated graphite, B4C powder, or boron and its compounds in a solid form as a poison in an aluminum or stainless steel clad. When used as a transient rod, it SHALL have an adjustable upper limit to allow a variation of reactivity insertions. This rod may incorporate a voided or a solid aluminum follower.

Basis

The poison requirements for the control rods are satisfied by using neutron-absorbing borated graphite, B4C powder, or boron and its compounds. These materials must be contained in a suitable cladding material, such as aluminum or stainless steel, to ensure mechanical stability during movement and to isolate the poison from the pool water environment. SCRAM capabilities are provided by the rapid insertion of the control rods, which is the primary operational safety feature of the reactor. The transient control rod is designed for use in a pulsing TRIGA reactor and does not by design have a fuel follower.

5.4 Fuel Storage

Specifications

a. All fuel elements SHALL be stored in a geometrical array where the keff is less than 0.8 for all conditions of moderation.

Irradiated fuel elements SHALL be stored in an array which SHALL permit sufficient natural convection cooling by water such that the fuel element temperature SHALL NOT reach the safety limit as defined in TS 2.1.

Basis

The limits imposed by this specification are conservative and ensure safe storage and handling of nuclear fuel. GA-5402 "Criticality Safety Guide" places a general limitation on well-moderated U-235 to 300 grams per square foot. A rack of new 12 wt% elements would have no more than 288 grams per square foot. Additional work by General Atomics in 1966 showed that a 2x10 array of 12 wt% elements with no separation would have a keff = 0.7967. Because the fuel racks used for storage have an actual spacing of 2.0 inches and 2.5 inches and vertically offset by 20 inches, the calculations are conservative.

5.5 Reactor Bay Confinement and Ventilation Systems

Specifications

- a. The reactor SHALL be housed in a room (reactor bay) designed to restrict leakage. The minimum free volume (total bay volume minus occupied volume) in the reactor bay SHALL be 1900 m³.
- b. The reactor bay SHALL be equipped with two exhaust systems. Under normal operating conditions, the reactor bay heating ventilation air conditioning and exhaust system exhausts unfiltered reactor bay air to the environment releasing it at a point at least 34 feet (10.5 m) above the reactor bay floor. Upon initiation of a building evacuation alarm, the previously mentioned system is automatically isolated and an emergency exhaust system automatically starts. The emergency exhaust system is also designed to discharge reactor bay air at a point at least 34 feet above reactor bay floor.

Basis

The value of 1900 m³ for reactor bay free volume is assumed in the SAR 13.1.1 Maximum Hypothetical Accident and is used in the calculation of the radionuclide concentrations for the analysis

The SAR analysis 13.1.1 Maximum Hypothetical Accident does not take credit for any filtration present in the emergency exhaust system. The height above the reactor bay floor level of the release helps to ensure adequate mixing prior to possible public exposure.

5.6 <u>Reactor Pool Water Systems</u>

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The reactor core SHALL be cooled by natural convective water flow.

Thermal and hydraulic calculations and operational experience indicate that a compact TRIGA reactor core can be safely operated up to power levels of at least 1.15 MW (thermal) with natural convective cooling.

6.0 **ADMINISTRATIVE CONTROLS**

6.1 Organization

6.1.1 Structure

The University Vice President for Research Dean of the Graduate School (level 1) has the responsibility for the reactor facility license. The management of the facility is the responsibility of the Director (level 2), who reports to the Vice President for Research, Dean of the Graduate School through the office of the Dean of the College of Engineering. Administrative and fiscal responsibility is within the office of the Dean.

The minimum qualifications for the position of Director of the PSBR are an advanced degree in science or engineering, and 2 years experience in reactor operation. Five years of experience directing reactor operations may be substituted for an advanced degree.

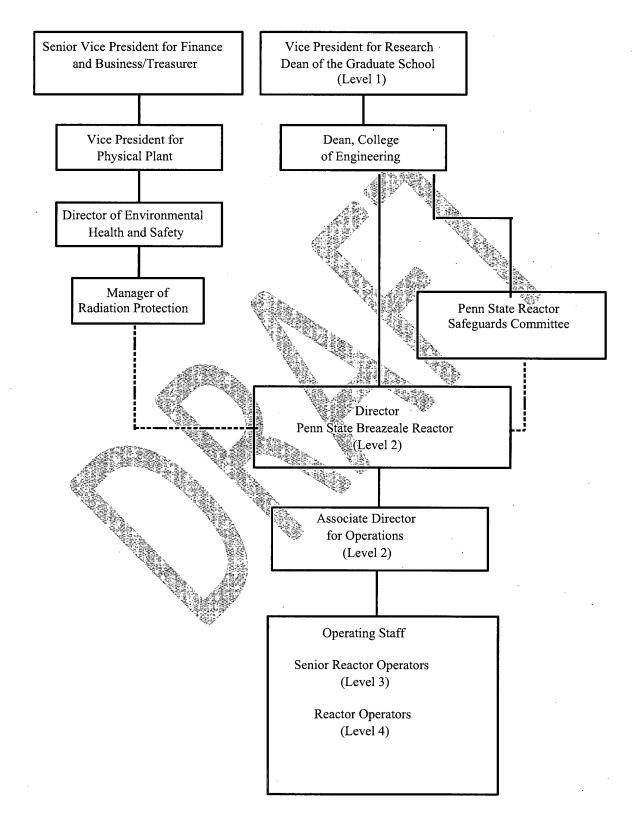
The Manager of Radiation Protection reports through the Director of Environmental Health and Safety, the assistant Vice President for Physical Plant, and to the Senior Vice President for Finance and Business/Treasurer. The qualifications for the Manager of Radiation Protection position are the equivalent of a graduate degree in radiation protection, 3 to 5 years experience with a broad byproduct material license, and certification by The American Board of Health Physics or eligibility for certification.

6.1.2 <u>Responsibility</u>

Responsibility for the safe operation of the reactor facility SHALL be within the chain of command shown in the organization chart. Individuals at the various management levels, in addition to having responsibility for the policies and operation of the reactor facility, SHALL be responsible for safeguarding the public and facility personnel from undue radiation exposures and for adhering to all requirements of the operating license and technical specifications.

In all instances, responsibilities of one level may be assumed by designated alternates or by higher levels, conditional upon appropriate qualifications.

ORGANIZATION CHART



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6.1.3 Staffing

- a. The minimum staffing when the reactor is not secured SHALL be:
 - 1) A licensed operator present in the control room, in accordance with applicable regulations.
 - 2) A second person present at the facility able to carry out prescribed written instructions.
 - If a senior reactor operator is not present at the facility, one SHALL be available by telephone and able to be at the facility within 30 minutes.
- b. A list of reactor facility personnel by name and telephone number SHALL be readily available in the control room for use by the operator. The list SHALL include
 - 1) Management personnel.
 - 2) Radiation safety personnel.
 - 3) Other operations personnel.

c. Events requiring the direction of a Senior Reactor Operator SHALL

1) All fuel or control-rod relocations within the reactor core region.

Relocation of any in-core experiment with a reactivity worth greater than one dollar

B) Recovery from unplanned or unscheduled shutdown (in this instance, documented verbal concurrence from a Senior Reactor Operator is required).

6.1.4 Selection and Training of Personnel

The selection, training, and requalification of operations personnel SHALL meet of exceed the requirements of all applicable regulations and the American National Standard for Selection and Training of Personnel for Research Reactors, ANSI/ANS-15.4-1988, Sections 4-6.

6.2 Review and Audit

6.2.1 Safeguards Committee Composition

A Penn State Reactor Safeguards Committee (PSRSC) SHALL exist to provide an independent review and audit of the safety aspects of reactor facility operations. The committee SHALL have a minimum of 5 members and SHALL collectively represent a broad spectrum of expertise in reactor technology and other science and engineering fields. The committee SHALL have at least one member with health physics expertise. The committee SHALL be appointed by and report to the Dean of the College of Engineering. The PSBR Director SHALL be an ex-officio member of the PSRSC.

6.2.2 Charter and Rules

The operations of the PSRSC SHALL be in accordance with a written charter, including provisions for:

a. Meeting frequency - not less than once per calendar year not to exceed 15 months.

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b. Quorums - at least one-half of the voting membership SHALL be present (the Director who is ex-officio SHALL NOT vote) and no more than one-half of the voting members present SHALL be members of the reactor staff.

c. Use of Subgroups - the committee chairman can appoint ad-Hoc committees as deemed necessary.

Minutes of the meetings - SHALL be recorded, disseminated, reviewed, and approved in a timely manner.

6.2.3 <u>Review Function</u>

The following items SHALL be reviewed:

- a. 10 CFR Part 50.59 reviews of:
 - 1) Proposed changes in equipment, systems, tests, or experiments.
 - 2) All new procedures and major revisions thereto having a significant effect upon safety.
 - 3) All new experiments or classes of experiments that could have a significant effect upon reactivity or upon the release of radioactivity.
- b. Proposed changes in technical specifications, license, or charter.
- c. Violations of technical specifications, license, or charter. Violations of internal procedures or instructions having safety significance.
- d. Operating abnormalities having safety significance.
- e. Special reports listed in TS 6.6.2.
- f. Audit reports.
- 6.2.4 <u>Auc</u>

The audit function SHALL be performed annually, not to exceed 15 months, preferably by a non-member of the reactor staff. The audit function SHALL be performed by a person not directly involved with the function being audited. The audit function SHALL include selective (but comprehensive) examinations of operating records, logs, and other documents. Discussions with operating personnel and observation of operations should also be used as appropriate. Deficiencies uncovered that affect reactor safety SHALL promptly be reported to the office of the Dean of the College of Engineering. The following items SHALL be audited:

- a Facility operations for conformance to Technical Specifications, license, and procedures (at least once per calendar year with interval not to exceed 15 months).
- b. The requalification program for the operating staff (at least once every other calendar year with the interval not to exceed 30 months).
- c. The results of action taken to correct deficiencies that may occur in the reactor facility equipment, systems, structures, or methods of operations that affect reactor safety (at least once per calendar year with the interval not to exceed 15 months).
- d. The reactor facility emergency plan and implementing procedures (at least once every other calendar year with the interval not to exceed 30 months).

6.3 **Operating Procedures**

Written procedures SHALL be reviewed and approved prior to the initiation of activities covered by them in accordance with TS 6.2.3. Written procedures SHALL be adequate to ensure the safe operation of the reactor, but SHALL NOT preclude the use of independent judgment and action should the situation require such. Operating procedures SHALL be in effect and SHALL be followed for at least the following items:

- a. Startup, operation, and shutdown of the reactor
- b. Core loading, unloading, and fuel movement within the reactor.
- c. Routine maintenance of major components of systems that could have an effect on reactor safety.
- d. Surveillance tests and calibrations required by the technical specifications (including daily checkout procedure).
- e. Radiation, evacuation, and alarm checks
- f. Release of irradiated samples.
- g. Evacuation.
- h. Fire or explosion.
- i. Gaseous release
- Medical emergencies.
- k. Civil disorder

Bomb threat.

- m. Threat of theft of special nuclear material.
- n. Theft of special nuclear material.
- o. Industrial sabotage.
- p. Experiment evaluation and authorization.
- q. Reactor operation using a beam port.

- r. D₂O handling.
- s. Health physics orientation requirements.
- t. Hot cell entry procedure.
- u. Implementation of emergency and security plans.
- v. Radiation instrument calibration
- w. Loss of pool water.
- 6.4 <u>Review and Approval of Experiments</u>
 - a. All new experiments SHALL be reviewed for Technical Specifications compliance, 10 CFR Part 50.59 analysis, and approved in writing by level 2 management or designated alternate prior to initiation.
 - b. Substantive changes to experiments previously reviewed by the PSRSC SHALL be made only after review and approval in writing by level 2 management or designated alternate.
- 6.5 <u>Required Action</u>
 - 6.5.1 <u>Action to be Taken in the Event the Safety Limit is Exceeded</u> In the event the safety limit (1150°C) is exceeded:
 - In the event the safety limit (ULSO'C) is exceeded
 - a. The reactor SHALL be shut down and reactor operation SHALL NOT be resumed until authorized by the U.S. Nuclear Regulatory Commission.

 - b. The safety limit violation SHALL be promptly reported to level 2 or designated alternates.
 - c. An immediate report of the occurrence SHALL be made to the Chairman PSRSC and reports SHALL be made to the USNRC in accordance with TS 6.6.
 - d. A report SHALL be prepared which SHALL include an analysis of the causes and extent of possible resultant damage, efficacy of corrective action, and recommendations for measures to prevent or reduce the probability of recurrence. This report SHALL be submitted to the PSRSC for review.

6.5.2 Action to be Taken in the Event of a Reportable Occurrence

In the event of a reportable occurrence, (Definition 1.1.34) the following action SHALL be taken:

- a. The reactor SHALL be returned to normal or shutdown. If it is necessary to shutdown the reactor to correct the occurrence, operations SHALL NOT be resumed unless authorized by level 2 or designated alternates.
- b. The Director or a designated alternate SHALL be notified and corrective action taken with respect to the operations involved.
- c. The Director or a designated alternate SHALL notify the office of the Dean of the College of Engineering and the office of the Vice President for Research, Dean of the Graduate School.
- d. The Director or a designated alternate SHALL notify the Chairman of the PSRSC.
- e. A report SHALL be made to the PSRSC which SHALL include an analysis of the cause of the occurrence, efficacy of corrective action, and recommendations for measures to prevent or reduce the probability of recurrence. This report SHALL be reviewed by the PSRSC at their next meeting.
- A report SHALL be made to the Document Control Desk, USNRC Washington DC 20555
- 6.6 <u>Reports</u>
 - 6.6.1 Operating Reports

An annual report SHALL be submitted within 6 months of the end of The Pennsylvania State University fiscal year to the Document Control Desk, USNRC, Washington, DC 20555, including at least the following items:

A narrative summary of reactor operating experience including the energy produced by the reactor, and the number of pulses \geq \$2.00 but less than or equal to \$2.50 and the number greater than \$2.50.

- b. The unscheduled shutdowns and reasons for them including, where applicable, corrective action taken to preclude recurrence.
- c. Tabulation of major preventive and corrective maintenance operations having safety significance.

- d. Tabulation of major changes in the reactor facility and procedures, and tabulation of new tests and experiments, that are significantly different from those performed previously and are not described in the Safety Analysis Report, including a summary of the analyses leading to the conclusions that no license amendment, as described in 10 CFR 50.59, was required.
- e. A summary of the nature and amount of radioactive effluents released or discharged to environs beyond the effective control of the owneroperator as determined at or before the point of such release or discharge. The summary SHALL include to the extent practicable an estimate of individual radionuclides present in the effluent. If the estimated average release after dilution or diffusion is less than 20 percent of the concentration allowed or recommended, only a statement to this effect need be presented.
- f. A summarized result of environmental surveys performed outside the facility.
- 6.6.2 Special Reports

Special reports are used to report unplained events as well as planned major facility and administrative changes. These special reports SHALL contain and SHALL be communicated as follows:

a There SHALL be a report no later than the following working day by telephone to the Operations Center, USNRC, Washington, DC 20555, to be followed by a written report to the Document Control Desk, USNRC, Washington, DC 20555, that describes the circumstances of the event within 14 days of any of the following:

Violation of safety limits (See TS 6.5.1)

- Release of radioactivity from the site above allowed limits (See TS 6.5.2)
- 3) A reportable occurrence (Definition 1.1.34)
- A written report SHALL be made within 30 days to the USNRC, and to the offices given in TS 6.6.1 for the following:
 - 1) Permanent changes in the facility organization involving level 1-2 personnel.
 - 2) Significant changes in the transient or accident analysis as described in the Safety Analysis Report.

6.7 <u>Records</u>

To fulfill the requirements of applicable regulations, records and logs SHALL be prepared, and retained for the following items:

- 6.7.1 <u>Records to be Retained for at Least Five Years</u>
 - a. Log of reactor operation and summary of energy produced or hours the reactor was critical.
 - b. Checks and calibrations procedure file
 - c. Preventive and corrective electronic maintenance log.
 - d. Major changes in the reactor facility and procedures.
 - e. Experiment authorization file including conclusions that new tests or experiments did not require a license amendment, as described in 10 CFR 50.59.
 - f. Event evaluation forms (including unscheduled shutdowns) and reportable occurrence reports.
 - g. Preventive and corrective maintenance records of associated reactor equipment.
 - h Facility radiation and contamination surveys.
 - . Fuel inventories and transfers.
 - Surveillance activities as required by the Technical Specifications.
 - k. Records of PSRSC reviews and audits.
 - Records to be Retained for at Least One Training Cycle

a. Requalification records for licensed reactor operators and senior reactor operators

- 6.7.3 <u>Records to be Retained for the Life of the Reactor Facility</u>
 - a. Radiation exposure records for all personnel monitored in accordance with 10CFR20.2106.
 - b. Environmental surveys performed outside the facility.
 - c. Radioactive effluents released to the environs.
 - d. Drawings of the reactor facility including changes.
 - e. Records of the results of each review of exceeding the safety limit, the automatic safety system not functioning as required by TS 2.2, or any limiting condition for operation not being met.

6.0 ENGINEERED SAFETY FEATURES

6.1 Summary Description

The building is constructed of concrete blocks, bricks, insulated steel and aluminum panels, structural steel, and re-enforced concrete and is in general, fireproof in nature. The reactor bay serves as a confinement designed to limit the exchange of effluents with the external environment through controlled or defined pathways. During normal operations, the reactor bay is kept at a negative pressure with respect to the atmosphere by the operation of one or more of four separate exhaust fans and associated confinement penetrations. Three fans are associated with the Reactor Bay Heating Ventilation air conditioning and Exhaust System (RBHVES) and the other is the Emergency Exhaust System (EES) fan. When the evacuation alarm is actuated, the EES fan starts (if not previously running) and all other fans are shutdown and the their penetrations are closed (via dampers), whereby a negative pressure is maintained on the reactor bay and the effluent is exhausted through filters to a stack that exhausts approximately 34 feet (~10 m) above reactor bay floor level. The reactor bay meets the TS definition 1.1.8, "Confinement means an enclosure on the overall facility which controls the movement of air into and out through a controlled path".

6.2 Detailed Descriptions

6.2.1 Confinement

The \sim 70,000 feet³ (1900 m³) minimum volume reactor bay is maintained at a negative pressure with respect to the remainder of the building by one or more of four separate exhaust fans (see Figure 6-1). Depending on operational configuration, fresh air to the reactor bay is supplied by leaks around doors and penetrations and by the supply air fan. Normal heating, cooling, ventilation, and negative pressure of the reactor bay is maintained by the RBHVES. A filtered emergency exhaust system (EES) is also available.

The RBHVES functions are to supply fresh tempered makeup air and to control air flow through the reactor bay to minimize worker radiation exposure and to release the reactor bay air in a controlled manner (~3500 feet³/min or 9.9 x $10^4 \ell$ /min) where dilution and diffusion of the effluent occurs before it comes into contact with the public. Argon-41 is the only radioactive gas of significance released during the normal operation of the reactor, and is the result of the action of thermal neutrons on air in the reactor pool water and in experimental apparatus. See section 11.1.1.1 for typical Argon-41 annual releases and section 11.1.5 for a discussion of personnel exposures.

The RBHVES contains an exhaust fan and stack that exhausts at reactor bay roof level, a makeup fan with enthalpy wheel, a recirculation fan and associated control dampers. Confinement penetration dampers close to isolate the system on system shutdown or power failure. During normal operation the balance of fresh makeup air and exhaust air maintains a slight negative pressure in the reactor bay. Two additional roof fans with gravity back-draft dampers are available as backup and to improve heating and cooling efficiency during certain weather conditions. The RBHVES serves no safety function during an airborne release.

When the evacuation alarm system is activated, any operating RBHVES fans are shutdown, associated confinement isolation dampers shut, and the EES system starts. The EES creates sufficient negative pressure in the reactor bay so that any movement of radioactive material from the bay would be through the system filters. Air enters the EES through a screened opening in the east wall of the reactor bay about ~14 feet (~4 m) above the bay floor (see Figure 6-2 EES System). The air then passes through a pre-filter, absolute filter, and carbon filter that are mounted in a housing on the roof of the east extension of the reactor bay. The exhaust fan (~3100 feet³/min or ~9.1 x $10^4 \ell$ /min with system dampers completely open) is also mounted there. Flow can be reduced through the system by adjusting the manual dampers. Filtered air exhausts into an 18 inch (46 cm) diameter PVC pipe and stack. The stack travels up the east outside wall of the reactor building and exhausts at a point above the reactor bay roof (~34 feet above reactor bay floor level).

The EES control panel in the Cobalt-60 facility entrance lobby shows the operational status of the EES system. The control panel consists of four differential pressure gauges, three of which show pressure drops across each of the filters. The fourth pressure gauge shows the velocity pressure in the stack. Also located on the control panel are two pilot lights; one indicates that the system is energized, the other indicates flow in the system (by means of a flow switch). A switch that allows the system to be manually activated is also on the panel. Manual start of the EES does not affect the RBHVES system operation.

The EES three stage filter system is housed in a dust-tight containment. The purpose of the lowcost pre-filter is to filter atmospheric dust that would be deposited in the more expensive absolute filter. Thus, the lifetime of the absolute filter is extended. The high-efficiency absolute filter is needed to remove particulate radiation and has a removal efficiency of 99.9% for .3 micron-sized particles and 99.99% for one micron-sized particles. The carbon filter has a high efficiency for removing fission gases, most importantly the radioiodine.

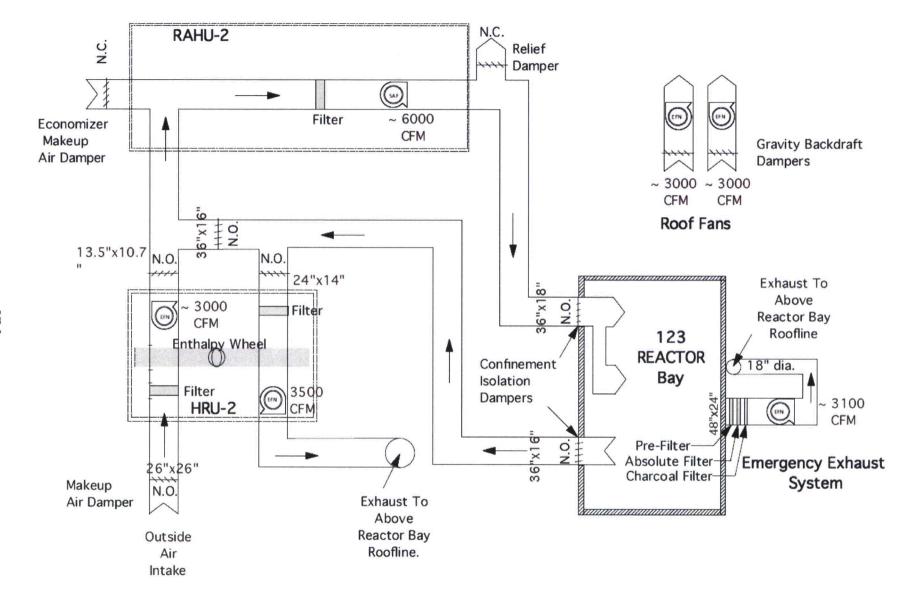


Figure 6-1 Reactor Bay HVAC and Emergency Exhaust Systems

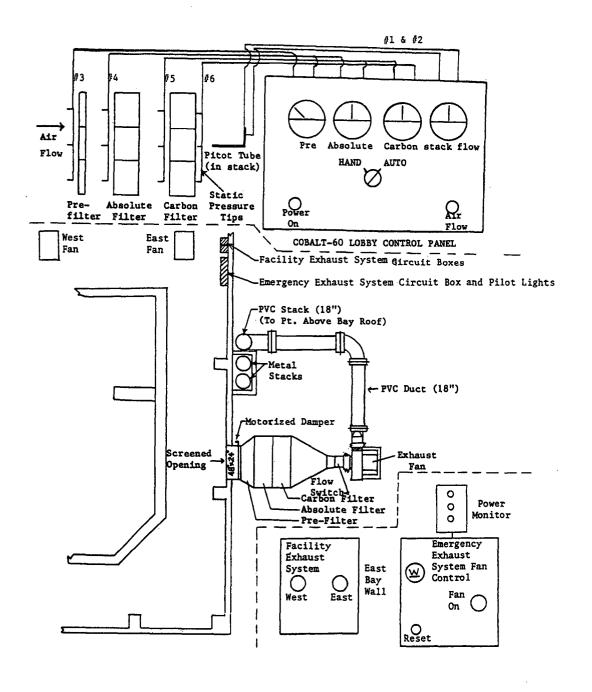


Figure 6-2 Emergency Exhaust System

Static tips are located upstream of the pre-filter, between the pre-filter and the absolute filter, between the absolute filter and the carbon filter, and downstream of the carbon filter. These static tips are connected to three of the differential pressure gauges by copper tubing. A stainless pitot tube mounted in the stack is connected to the fourth differential pressure gauge. As the EES is operated, both the efficiency and the pressure drop across the filters increase due to loading. The filters should be changed when the initial pressure drop (normal operating range for clean filters) has approximately doubled (removal range for spent filters), which is well before the maximum design pressure drop (flag setting) across the filter is exceeded (see **Table 6-1**). Periodic checks of the filter criteria are provided by a PSBR standard operating procedure.

	EES Filter C	Eriteria	
	Normal Operating Range	Removal Range	Flag Setting
	(inches H_2O)	(inches H_2O)	(inches H ₂ O)
Pre-filter	.07	.1424	0.42
Absolute Filter	.7	1.4 – 1.5	1.65
Carbon Filter	.6	1.0 - 1.1	1.15
Stack	.2		0.52

Table 6-1
EES Filter Criteria

The switch on the control panel has two operational modes, auto and hand. It is not possible to disable the system with this switch. Operating the system using the hand mode has no effect on the reactor's operation or any other system.

A Power Monitor box (reactor bay east wall) has three red neon lights that are lit when there is three-phase AC power available to the system. In the auto mode, when an evacuation is initiated, an indicator on the emergency exhaust system fan control box (reactor bay east wall) is lit when the emergency exhaust fan is energized.

Once the EES is energized, it takes ten to fifteen seconds for the EES flow to increase enough to activate the stack flow switch that turns on the red power-on light on the Cobalt-60 lobby control panel. Shortly thereafter, the air flow will stabilize at its normal rate (and the pressure drop gauges will stabilize). A console message "Emerg Ventilation Flow On" (also actuated by the flow switch in the stack) is the positive indication to the reactor operator that the emergency exhaust system is energized and has flow. DCC-X (reactor console digital control computer discussed in Chapter 7) also disables the RBHVES if the EES was activated by DCC-X; manually activating the EES does not disable the RBHVES.

The TS describe the requirements for the confinement and for RBHVES and EES system operability and periodic surveillance during reactor operation and fuel movement:

- TS 3.4 describes the ventilation and air passages requirements to meet the definition of confinement operability
- TS 3.5 describes requirements for exhaust fan and EES operability when the reactor is operating or irradiated fuel or fueled experiments are being moved
- TS 4.4 describes the surveillance requirements for verification of confinement status (reactor doors and penetrations)
- TS 4.5 indicates the surveillance frequencies to ensure the proper operation of the RBHVES and the EES in controlling the releases of radioactive material to the uncontrolled environment.
- TS 5.5a describes the confinement as designed to restrict leakage and describes the minimum volume
- TS 5.5b describes the RBHVES and EES systems, and operability during normal and alarm conditions

Section 13.1, Accident Analysis, gives a summary of projected radiological exposures from the MHA. This information indicates that even if the EES fails to operate during the MHA, doses to the public are still within 10 CFR 20 limits.

6.2.2 Containment

Not applicable for PSBR.

6.2.3 Emergency Core Cooling System

Not applicable for PSBR.