

April 5, 2016

MEMORANDUM TO: Brian E. Thomas, Director
Division of Engineering
Office of Nuclear Regulatory Research

FROM: Joseph G. Giitter, Director /RA/
Division of Risk Assessment
Office of Nuclear Reactor Regulation

SUBJECT: RESULTS OF PERIODIC REVIEW OF REGULATORY GUIDE 1.24

This memorandum documents the U.S. Nuclear Regulatory Commission's (NRC) periodic review of Regulatory Guide (RG) 1.24, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Pressurized Water Reactor Radioactive Gas Storage Tank Failure," published in March 1972. The RG describes methods that the NRC staff considers acceptable for complying with the NRC's regulations regarding the evaluation of the potential radiological consequences of a pressurized-water reactor radioactive gas storage tank failure. As discussed in Management Directive 6.6, "Regulatory Guides," the NRC staff reviews RGs approximately every 5 years to ensure that the RGs continue to provide useful guidance. Documentation of the Office of Nuclear Reactor Regulation (NRR) staff review is enclosed.

Based on the results of the periodic review, the NRR staff concludes that no changes to RG 1.24 are warranted at this time. However, the staff identified issues in the review that could warrant addressing in a future revision. These issues are primarily the result of the NRC publishing updated guidance that is applicable to this area, but is located in other documents (i.e., other RGs and NUREGs), as described in detail in the enclosed review.

Enclosure:
Regulatory Guide Periodic Review

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DATE	03/08/2016	03/07/2016	03/21/2016	03/25/2016	04/05/2016

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Regulatory Guide Periodic Review

Regulatory Guide Number: 1.24, Revision 0

Title: Assumptions Used for Evaluating the Potential Radiological Consequences of a Pressurized Water Reactor Radioactive Gas Storage Tank Failure

Office/Division/Branch: NRR/DRA/ARCB

Technical Lead: David Garmon

Staff Action Decided: Reviewed with issues identified for future consideration

1. What are the known technical or regulatory issues with the current version of the Regulatory Guide (RG)?

Regulatory Guide (RG) 1.24, Revision (Rev.) 0, was published in 1972 as Safety Guide 24 and was re-published in 2010 in the updated RG format; however, no changes were made to the content of the guide so it was re-published as Rev.0. RG 1.24, Rev.0, provides guidance to pressurized-water reactor licensees in selecting appropriate assumptions in the analysis of radioactive gas storage tank failures. While the guidance in the current version of RG 1.24 remains adequate, there are several technical and regulatory issues with the RG. These issues are primarily the result of the Nuclear Regulatory Commission (NRC) publishing updated guidance that is applicable to this area, but is located in other documents (i.e., other RGs and NUREGs), as described below. This updated guidance provides additional flexibility and more accurate assumptions for use in analyzing radioactive gas storage tank failure events, and thus should be included in future revisions to RG 1.24.

RG 1.24, Rev. 0, Section B contains four paragraphs that describe design guidance for radioactive gas storage systems; however, more complete guidance is located in RG 1.143, Revision 2, "Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled-Nuclear Power Plants." (Note: As of June 2015, the NRC staff planned to revise RG 1.143, Revision 2; see Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML15153A265 and ML15153A254).

The guidance in RG 1.24, Rev. 0, Section C differs from assumptions and acceptance criteria included in NRC Branch Technical Position (BTP) 11-5, "Postulated Radioactive Releases due to a Waste Gas System Leak or Failure," of the NUREG-0800 (Standard Review Plan), Chapter 11.3, "Gaseous Waste Management System." The Regulatory Positions in RG 1.24, Rev.0, Section C provide guidance in three broad areas:

(1) Source term; (2) Atmospheric diffusion; and (3) Submersion Dose calculations. The guidance that is applicable to source term determination does not include an allowance for the use of the techniques described in RG 1.112, Rev. 1, "Calculation of Releases of Radioactive Materials in Gaseous and Liquid Effluents from Light-Water-Cooled Power

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Reactors;" however, such techniques are allowed under certain circumstances by BTP 11-5. The guidance applicable to atmospheric diffusion refers to dated documents that may not be widely available. The source, or technical basis, for the figures at the end of RG 1.24, Rev. 0, is not included in the RG. The techniques discussed in RG 1.145, Rev. 1, "Atmospheric Dispersion Models for Potential Accident Consequence Assessments at Nuclear Power Plants," in particular, the consideration of a meandering plume at, or, near ground levels, are not described, or referenced in RG 1.24, Rev. 0 (Note: The NRC reviewed RG 1.145, Rev. 1, in 2014 and identified issues for future consideration; however, RG 1.145, Rev. 1, was not updated. The reader is directed to consider the review memoranda at ADAMS Accession Nos. ML14114A735 and ML14114A736 before applying the guidance in RG 1.145, Rev. 1).

BTP 11-5 provides acceptance criteria for doses at the exclusion area boundary (EAB) that result from radioactive waste gas system failures. While not specifically an assumption in the analysis of these types of events, the applicable acceptance criteria is information that should be provided in future versions of RG 1.24. For plants that have radioactive waste gas systems that are designed in accordance with the guidance of RG 1.143 to withstand the effects of a hydrogen explosion and earthquakes, the resulting dose to the whole body to an individual at the EAB shall not exceed 2.5 roentgen equivalent man (rem) (25 millisievert (mSv)). For plants with radioactive waste gas systems that are not hardened, as prescribed in RG 1.143, the resulting dose to the whole body to an individual at the EAB shall not exceed 0.1 rem (1 mSv).

While the staff has identified these issues with RG 1.24, Rev. 0, this review did not identify any safety concerns or an immediate need to revise this RG.

2. What is the impact on internal and external stakeholders of not updating the RG for the known issues, in terms of anticipated numbers of licensing and inspection activities over the next several years?

For operating reactors, the staff anticipates few licensing activities that will involve the use of RG 1.24, Rev. 0, in the near future. For new reactors, there is a potential for several small modular reactor design certification applications and combined license applications to be submitted in the near future (next 3 to 5 years) that would require the guidance found in RG 1.24, Rev. 0. Since the issues that have been identified through this review represent potential improvements in the document and not deficiencies in the adequacy of the current guidance, there will be little to no impact on internal and external stakeholders if the RG is not revised at this time.

3. What is an estimate of the level of effort needed to address identified issues in terms of full-time equivalent (FTE) and contractor resources?

Revision of this RG will take approximately 0.2 FTE of NRC staff time and will require significant coordination between several NRC offices; in particular, the Office of Nuclear Reactor Regulation and the Office of New Reactors. It is recommended that revision of this RG be coordinated with the revision of RG 1.98, Rev. 0. Contractor support is not needed to update this RG.

4. **Based on the answers to the questions above, what is the staff action for this guide (Reviewed with no issues identified, Reviewed with issues identified for future consideration, Revise, or Withdraw)?**

Reviewed with issues identified for future consideration.

5. **Provide a conceptual plan and timeframe to address the issues identified during the review.**

Although the NRC does not currently plan a revision to this RG, the NRC plans to continue periodic reviews of this guidance in accordance with agency procedures. The issues identified as part of this review will be considered in future reviews.

NOTE: This review was conducted in February 2016 and reflects the staff's plans as of that date. These plans are tentative and are subject to change.