

CHAPTER 6

ENGINEERED SAFETY FEATURES

6.0 GENERAL DESIGN CRITERIA

Criteria applying in common to all engineered safety features are given in Section 6.1.1. Criteria which are related to engineered safety features, but which are applicable to specific features or systems, are listed and cross referenced in Section 6.1.2.

The engineered safety features are discussed in detail in this Chapter. In each section a separate safety feature is described and evaluated. In the evaluation section for each engineered safety feature, a single failure evaluation is provided which delineates the components of that safety feature system and the interconnected auxiliary systems that must function for the proper operation of that engineered safety feature. An examination of these tables shows that some components of the Residual Heat Removal System, Component Cooling Water System, and the Service Water Systems are necessary for proper operation of the Engineered Safety Features. These systems and their components are discussed in Sections 9.3 and 9.6; the instrumentation associated with these systems is also discussed in the referenced sections. Since the auxiliary system components, both inside and outside the containment, and their instrumentation and power systems are not required for actuation of the engineered safety features, neither IEEE-279 nor the General Design Criteria apply.

The General Design Criteria presented and discussed in this section are those which were in effect at the time when Indian Point 3 was designed and constructed. These general design criteria, which formed the bases for the Indian Point 3 design, were published by the Atomic Energy Commission in the Federal Register of July 11, 1967, and subsequently made a part of 10 CFR 50.

The Authority has completed a study of compliance with 10 CFR Parts 20 and 50 in accordance with some of the provisions of the Commission's Confirmatory Order of February 11, 1980. The detailed results of the evaluation of compliance of Indian Point 3 with the General Design Criteria established by the Nuclear Regulatory Commission (NRC) in 10 CFR 50 Appendix A, and in effect at the time of study, were submitted to NRC on August 11, 1980, and approved by the Commission on January 19, 1982. These results are presented in Section 1.3.

6.1. Engineered Safety Features Criteria

Engineered Safety Features Basis for Design

Criterion: Engineered safety features shall be provided in the facility to back up the safety provided by the core design, the reactor coolant pressure boundary, and their protection systems. Such engineered safety features shall be designed to cope with any size reactor coolant piping break up to and including the equivalent of a circumferential rupture of any pipe in that boundary, assuming unobstructed discharge from both ends. (CDC 37 of 7/11/67)

The design, fabrication, testing and inspection of the core, reactor coolant pressure boundary and their protection systems give assurance of safe and reliable operation under all anticipated normal, transient, and accident conditions. However, engineered safety features are provided in the facility to back up the safety provided by these components. These engineered safety

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features were designed to cope with any size reactor coolant pipe break, up to and including the circumferential rupture of any pipe, assuming unobstructed discharge from both ends, and to cope with any steam or feedwater line break, up to and including the main steam or feedwater headers.

Limiting the release of fission products from the reactor fuel is accomplished by the Safety Injection System which, by cooling the core, keeps the fuel in place and substantially intact, and limits the metal water reaction to an insignificant amount.

The Safety Injection System consists of high and low head centrifugal pumps driven by electric motors, and passive accumulator tanks which are self actuated and which act independently of any actuation signal or power source.

The release of fission products from the containment is limited in three ways:

1. Blocking the potential leakage paths from the containment. This is accomplished by:

A steel-lined, reinforced concrete Reactor Containment with testable, doubly sealed penetrations and most liner weld channels, the spaces of which are continuously pressurized above accident pressure, and which form a virtually leak-tight barrier to the escape of fission products should a loss-of-coolant accident occur.

Isolation of process lines by the Containment Isolation System which imposes double barriers in each line which penetrates the containment except for lines utilized during the accident. An Isolation Valve Seal Water System provides a water or nitrogen seal at the isolation valves thus sealing some of the pipes penetrating the containment.

2. Reducing the fission product concentration in the containment atmosphere. This is accomplished by:
 - a) Containment Air recirculation filters which provide for rapid removal of particles and iodine vapor from the containment atmosphere.
 - b) Chemically treated spray which removes elemental iodine vapor from the containment atmosphere by washing action.
3. Reducing the containment pressure and thereby limiting the driving potential for fission product leakage. This is accomplished by cooling the containment atmosphere by the following independent systems:
 - a) Containment Spray System
 - b) Containment Air Recirculation and Cooling System

Reliability and Testability of Engineered Safety Features

Criterion: All engineered safety features shall be designed to provide such functional reliability and ready testability as is necessary to avoid undue risk to the health and safety of the public. (GDC 38 of 7/11/67)

A comprehensive program of plant testing was formulated for all equipment, systems and system controls vital to the functioning of engineered safety features. The program consists of performance tests of individual pieces of equipment in the manufacturer's shop, integrated tests of the system as a whole, and periodic tests of the actuation circuitry and mechanical components to assure reliable performance, upon demand, throughout the plant lifetime.

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The initial tests of individual components and the integrated test of the system as a whole complemented each other to assure performance of the system as designed and to demonstrate the proper operation of the actuation circuitry.

Routine periodic testing of the engineered safety features components is performed as specified in the Technical Specifications.

Missile Protection

Criterion: Protection for engineered safety features shall be provided against dynamic effects and missiles that might result from plant equipment failures. (GDC 40 of 7/11/67)

A Loss-of-Coolant Accident or other plant equipment failures might result in dynamic effects or missiles. For engineered safety features which are required to ensure safety in the event of such an accident or equipment failure, protection is provided primarily by the provisions which are taken in the design to prevent the generation of missiles. In addition, protection is also provided by the layout of plant equipment or by missile barriers in certain cases. See Chapter 5 for a discussion of missile protection. The dynamic effects associated with postulated pipe breaks in the Primary Coolant System (hot legs, cold legs, crossover legs) need not be a design basis (NRC SER dated March 10, 1986).

Injection paths leading to unbroken reactor coolant loops are protected against damage as a result of the maximum reactor coolant pipe rupture by layout and structural design considerations. Injection lines penetrate the main missile barrier, which is the crane wall, and the injection headers are located in the missile-protected area between the crane wall and the containment wall. Individual injection lines, connected to the injection header, pass through the barrier and then connect to the loops. Separation of the individual injection lines is provided to the maximum extent practicable. Movement of the injection lines, associated with rupture of a reactor coolant loop, is accommodated by line flexibility and by the design of the pipe supports such that no damage outside the missile barrier is possible.

The containment structure is capable of withstanding the effects of missiles originating outside the containment, and which might be directed toward it, so that no Loss-of-Coolant Accident can result from these missiles.

All hangers, stops and anchors were designed in accordance with ANSI B31.1 Code for Pressure Piping and ACI 318 Building Code Requirements for Reinforced Concrete which provide minimum requirements on material, design and fabrication with ample safety margins for both dead and dynamic loads over the life of the equipment. Additional information on the design and re-analyses of hangers, stops and anchors is presented in Section 16.3.

Where necessary to prevent pipe whip, restraints were installed with the proper arrangement and spacing to prevent a plastic hinge mechanism from forming as a result of the forces associated with a pipe rupture. Restraint spacing was determined by calculation of the unsupported pipe length resulting in a plastic hinge formation for two basic support arrangement and break location cases. Both slot and guillotine breaks were considered. Slot breaks are defined as instantaneous openings in the pipe parallel to the axis of the pipe with an opening length twice the length of the nominal pipe diameter and with an opening area equal to the area of the pipe interior cross-section.

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Slot breaks were assumed to occur anywhere in the piping system, including fittings. Guillotine breaks are defined as instantaneous severance of the pipe cross-section and are assumed to occur any point of discontinuity in the piping system (such as valves, fittings and elbows). The pipe break loads were determined from

$$P' = P_o A$$

where P_o = system pressure

A = inside cross sectional area,

except for the main steam lines downstream of the flow limiting device, where force resultants are limited by the restriction of the flow limiting device. Such loads for the steam lines were taken as $P' = 340$ kips; and for the feedwater lines, $P' = 200$ kips. For both slot and guillotine breaks, restraints were spaced such that plastic hinge mechanisms cannot form in the piping system which would permit unrestrained rotation of the piping.

The restraints were designed such that the maximum applied load or stress be less than the lesser of the yield strength of the material or 0.67 times the rated ultimate load capacity of the support. High strength cable restraints were designed such that the maximum applied load be less than 0.4 times the rated ultimate load capacity of the cable. In those instances where the integrity of the restraint is also dependent on reinforced concrete anchorage, the concrete behavior limits are in accordance with ACI-318-63, Part IV-B, requirements and bearing stress is limited to $0.8 f'_c$.

Vital equipment is protected from pipe whip by locating restraints on nearby high pressure lines such that the two free ends of a broken pipe cannot reach the equipment.

The plant arrangement provides the basic protection against pipe whip. The four loops of the primary coolant system are spaced to the maximum extent possible; the crane wall protects the reactor compartment from pipe whip in the annulus; pipe lines are run radially outward from the reactor compartment. Wherever possible, redundant engineered safeguards piping is physically separated so that a failure of one pipe and subsequent whipping cannot cause the failure of the second pipe. Where physical separation is impossible, for instance the Accumulator Tanks' discharge piping, both pipes are restrained in such a way that a plastic hinge cannot form in case of a double ended rupture.

Containment fan cooler units are separated from high pressure pipe lines by the floor at Elev. 68' -0".

Small lines are treated no differently from large lines in so far as containment isolation, separation, pipe whip protection, etc. Separation is provided where whipping of larger lines would otherwise result in damage to many small lines.

Small lines having significant internal pressure are supported and restrained in a manner that would preclude any failure of the containment vessel from the failure of the small line. In addition, see Section 5.2 for the containment isolation provisions for these lines.

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Engineered Safety Features Performance Capability

Criterion: Engineered safety features, such as the emergency core cooling system and the containment heat removal system, shall provide sufficient performance capability to accommodate the failure of any single active component without resulting in undue risk to the health and safety of the public. (GDC 41 of 7/11/67)

Each engineered safety feature provides sufficient performance capability to accommodate any single failure of an active component and still function in manner to avoid undue risk to the health and safety of the public.

The extreme upper limit of public exposure is taken as the levels and time periods presently outlined in 10 CFR 100, i.e., 25 rem to the whole body (TEDE) in two hours at the exclusion radius and 25 rem to the whole body (TEDE) over the duration of the accident at the low population zone distance. The accident condition considered is the hypothetical case of a release of fission products per Alternate Source Term (NUREG-1465 / Regulatory Guide 1.183). Also, the total loss of all outside power is assumed concurrently with this accident. With all engineered safety features systems functioning at full capacity, the offsite exposure would be within 10 CFR 20 limits.

Under the above accident conditions, the Containment Air Recirculation Cooling and Filtration System and the Containment Spray System are designed and sized so that either system operating with partial effectiveness is able to supply the necessary post-accident cooling capacity to assure the maintenance of containment integrity, that is, keeping the pressure below design pressure at all times, assuming that the core residual heat is released to the containment as steam. Partial effectiveness is defined as operation of a system with at least one active component failure. Both systems together, each operating with partial effectiveness, are capable of providing the necessary post-accident iodine removal such that the resulting off-site exposures are within the guidelines of 10 CFR 100.

Engineered Safety Features Components Capability

Criterion: Engineered safety features shall be designed so that the capability of these features to perform their required function is not impaired by the effects of a Loss-of-Coolant Accident to the extent of causing undue risk to the health and safety of the public. (GDC 42 of 7/11/67)

Instrumentation, pumps, fans, filters, cooling units, valves, motors, cables and penetrations located inside the containment were selected to meet the most adverse accident conditions to which they may be subjected. These items are either protected from containment accident conditions or were designed to withstand, without failure, exposure to the worst combination of temperature, pressure, and humidity expected during the required operational period.

The Safety Injection System pipes serving each loop are anchored at the crane wall, which constitutes the missile barrier in each loop area, to restrict potential accident damage to the portion of piping beyond this point. The anchorage was designed to withstand, without failure, the thrust force of any branch line, severed from the reactor coolant pipe and discharging fluid to the atmosphere; and to withstand a bending moment equivalent to that which produces failure

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of the piping under the action of free discharge to atmosphere or motion of the broken reactor coolant pipe to which the injection pipes are connected. This prevents possible failure at any point upstream from the support point including the branch line connection into the piping header.

Accident Aggravation Prevention

Criterion: Protection against any action of the engineered safety features which would accentuate significantly the adverse after-effects of a loss of normal cooling shall be provided. (GDC 43 of 7/11/67)

The reactor is to be maintained subcritical following a pipe rupture accident. Introduction of borated cooling water into the core results in a net negative reactivity addition. The control rods are inserted and remain inserted.

The supply of water by the Safety Injection System to cool the core cladding reduces the potential for significant metal-water reaction (less than 1.0%).

The delivery of cold safety injection water to the reactor vessel following accidental expulsion of reactor coolant does not cause further loss of integrity of the Reactor Coolant System boundary.

Sharing of Systems

Criterion: Reactor facilities may share systems or components if it can be shown that such sharing will not result in undue risk to the health and safety of the public (GDC 4 of 7/11/67)

The residual heat removal pumps and heat exchangers serve dual functions. Although the normal duty of the residual heat exchangers and residual heat removal pumps is performed during periods of reactor shutdown, during all plant operating periods these residual heat removal pumps are aligned to perform the low head safety injection function. In addition, during the recirculation phase of a Loss-of-Coolant Accident, the residual heat exchangers of this system perform the core cooling function and the containment cooling function as part of the Containment Spray System, and the residual heat removal pumps, which are part of the external recirculation loop, provide back-up capability to the recirculation pumps which comprise part of the internal recirculation loop as described in Section 6.2.3.

Demonstration checking of the system, performed as dictated by the Technical Specifications, provides assurance of correct system alignment for the safety injection function of the components.

During the injection phase, the safety injection pumps do not depend on any portion of other systems. During the recirculation phase, if Reactor Coolant System pressure stays high due to a small break accident, suction to the safety injection pumps is provided by the internal recirculation pumps, and can also be provided by the Residual Heat Removal pumps.

The Containment Air Recirculation and Filtration System also serves the dual function of containment cooling during normal operation and containment cooling after an accident. Since the method of operation for both cooling functions is the same, the dual aspect of the system does not affect its function as an engineered safety feature.

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The steam supply and city water systems at the Indian Point site were shared by all three reactor facilities. However, independent steam supply and city water systems have been installed at Indian Point 3 (See Chapter 9); the city water system for Indian Point 2 is presently used by Indian Point 3 as a backup supply. The steam supply and city water systems are used for the following purposes:

- a) Steam for unit heaters for standby heating.
- b) Steam to valved hose connections for maintenance purposes.
- c) Water to emergency showers.
- d) Water to hose connections for maintenance purposes.
- e) (Deleted)
- f) Water supply to fire protection tanks.
- g) Water supply for make-up demineralizers in Condensate Polishing Facility (CPF).
- h) Redundant source of makeup water to the spent fuel pit.
- i) Backup water supply to Charging Pumps' Fluid Drive Coolers.
- j) Backup water supply to the 31 RHR pump.

6.1.2 Related Criteria

The following are criteria which, although related to all engineered safety features, are more specific to other plant features or systems, and therefore are discussed in other sections, as listed:

<u>Title of Criterion (7/11/67 issue)</u>	<u>Reference</u>
Quality Standards (GDC 1)	Chapter 4
Performance Standards (GDC 2)	Chapter 4
Records Requirements (GDC 5)	Chapter 4
Instrumentation and Control Systems (GDC 12)	Chapter 7
Engineered Safety Features Protection Systems (GDC 15)	Chapter 7
Emergency Power (GDC 39 and GDC 24)	Chapter 8

6.2 SAFETY INJECTION SYSTEM

6.2.1 Design Basis

The General Design Criteria presented and discussed in this section are those which were in effect at the time when Indian Point 3 was designed and constructed. On November 22, 1965, the Atomic Energy Commission (AEC) published and requested comments on Proposed General Design Criteria which were developed to assist in the evaluation of applications for nuclear power plant construction permits. On July 11, 1967, a revised set of General Design Criteria were published for comment. The revision reflected extensive public comments, suggestions from meetings with the Atomic Industrial Forum (AIF) and review within the AEC. In the July to October 1967 time frame, AIF Incorporated assembled nuclear industry comments and transmitted to the AEC revised wording of the 1967 Draft General Design Criteria along with a description of the changes. It was the AIF version of the 1967 General Design Criteria which formed the bases of the Indian Point 3 design and are discussed in this section. The AEC subsequently revised the 1967 version of the General Design Criteria and incorporated them into 10 CFR 50, Appendix A in 1971.

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The Authority has completed a study of compliance with 10 CFR Parts 20 and 50 in accordance with some of the provisions of the Commission's Confirmatory Order of February 11, 1980. The detailed results of the evaluation of compliance of Indian Point 3 with the General Design Criteria presently established by the Nuclear Regulatory Commission (NRC) in 10 CFR 50 Appendix A, were submitted to NRC on August 11, 1980, and approved by the Commission on January 19, 1982. These results are presented in Section 1.3.

Emergency Core Cooling System Capability

Criterion 44: An Emergency Core Cooling System with the capability for accomplishing adequate emergency core cooling shall be provided. This core cooling system and the core shall be designed to prevent fuel and clad damage that would interfere with the emergency core cooling function and to limit the clad metal water reaction to acceptable amounts for all sizes of breaks in the reactor coolant piping up to the equivalent of a double-ended rupture of the largest pipe. The performance of such emergency core cooling system shall be evaluated conservatively in each area of uncertainty.

Adequate emergency core cooling is provided by the Safety Injection System (which constitutes the Emergency Core Cooling System) whose components operate in three modes. These modes are delineated as passive accumulator injection, active safety injection and residual heat removal recirculation.

The system assures that the core will remain intact and in place with its essential heat transfer geometry preserved following a rupture in the Reactor Coolant System. It also assures that the extent of metal-water reaction is limited such that the amount of hydrogen generated from this source in combination with that from other sources, is tolerable in the Containment.

This capability is provided during the simultaneous occurrence of a Design Basis Earthquake. This protection is afforded for:

- 1) All pipe break sizes up to and including the hypothetical instantaneous circumferential rupture of a reactor coolant loop, assuming unobstructed discharge from both ends,
- 2) or loss of coolant associated with the rod ejection accident,
- 3) or steam generator tube rupture.

The primary function of the emergency Core Cooling System (ECCS) for the ruptures described is to remove the stored and fission product decay heat from the core such that fuel damage to the extent that would impair effective cooling of the core is prevented. This implies that the core remain intact and in place with its essential heat transfer geometry preserved. To assure effective cooling of the core, limits on peak clad temperature and local metal-water reaction will not be exceeded. It has been demonstrated in the Westinghouse Rod Burst Program that for conditions within the area of safe operation, fuel rod integrity is maintained.

To limit the production of hydrogen in the Containment, the overall metal water reaction is limited to 1%.

In evaluating ECCS performance, consideration was given to core geometry distortion caused by swelling or fuel rod bursting.

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For any rupture of a steam pipe and the associated uncontrolled heat removal from the core, the Safety Injection System (SIS) adds shutdown reactivity so that with a stuck rod, no offsite power and minimum engineered safety features, there is no consequential damage to the Reactor Coolant System and the core remains in place and intact.

Redundancy and segregation of instrumentation and components are incorporated to assure that postulated malfunctions will not impair the ability of the system to meet the design objectives. The system is effective in the event of loss of normal station auxiliary power coincident with the loss of coolant, and is tolerant of failures of any single component or instrument channel to respond actively in the system. During the recirculation phase, the system is tolerant of a loss of any part of the flow path since backup alternative flow path capability is provided as described in Section 6.2.3.

The ability of the Safety Injection System to meet its capability objectives is presented in Section 6.2.3. The analysis of the accidents is presented in Chapter 14.

Inspection of Emergency Core Cooling System

Criterion 45: Design provisions shall, where practical, be made to facilitate inspection of all physical parts of the Emergency Core Cooling System, including reactor vessel internals and water injection nozzles.

Design provisions are made to the extent practical in order to facilitate access to the critical parts of the reactor vessel internals, pipes, valves and pumps for visual or boroscopic inspection for erosion, corrosion and vibration wear evidence and for non-destructive test inspection where such techniques are desirable and appropriate as detailed in Section 6.2.5.

Testing of Emergency Core Cooling System Components

Criterion 46: Design provisions shall be made so that components of the Emergency Core Cooling System can be tested periodically for operability and functional performance.

The design provides for periodic testing of active components of the Safety Injection System for operability and functional performance as detailed in Section 6.2.5.

Power sources are arranged to permit individual actuation of each active component of the Safety Injection System.

The safety injection pumps can be tested periodically during plant operation using the minimum flow recirculation lines provided. The residual heat removal pumps are used every time the residual heat removal loop is put into operation and can be tested periodically. All remote operated valves can be exercised and actuation circuits can be tested during routine plant maintenance.

Testing of Emergency Core Cooling System

Criterion 47: Capability shall be provided to test periodically the operability of the Emergency Core Cooling System up to a location as close to the core as is practical.

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An integrated system test is performed when the plant is cooled down and the residual heat removal loop is in operation. This test would not introduce flow into the Reactor Coolant System but would demonstrate the operation of the valves, pump circuit breakers, and automatic circuitry upon initiation of safety injection.

Level and pressure instrumentation are provided for each accumulator tank, and accumulator tank pressure and level are continuously monitored during plant operation. Flow from the tanks can be checked at any time using test lines.

The accumulators and the safety injection piping up to the final isolation valve are maintained sufficiently full of borated water at boron concentrations consistent with the accident analysis while the plant is in operation to ensure the systems remain operable and perform properly. The accumulators and injection lines are refilled with borated water as required by using the safety injection pumps to recirculate refueling water through the injection headers. A small bypass line and a return line are provided for this purpose.

Flow in each of the high head injection branch lines and in the main flow line for the residual heat removal pumps is monitored by a flow indicator.

Pressure instrumentation is also provided for the main flow paths of the high head and residual heat removal pumps.

Testing of Operational Sequence of Emergency Core Cooling System

Criterion 48: Capability shall be provided to test initially, under conditions as close as practical to design, the full operational sequence that would bring the Emergency Core Cooling System into action, including the transfer to alternate power sources.

The design provides for capability to test, to the extent practical, the full operational sequence up to the design conditions for the Safety Injection System to demonstrate the state of readiness and capability of the system. Details of the operational sequence testing are presented in Section 6.2.5, Tests and Inspections.

Engineered Safety Features

The Engineered Safety Features are discussed in detail herein. In each section of this Chapter 6 a separate safety feature is described and evaluated. In the evaluation section for each Engineered Safety Feature, a single failure table is provided which lists the components of that safety feature system and the interconnected auxiliary systems that must function for the proper operation of that Engineered Safety Feature. An examination of these tables shows that some components of the Residual Heat Removal System, Component Cooling System, and Service Water System are necessary for proper operation of the Engineered Safety Features. These systems and their components are discussed in Section 9.3 and 9.6. The instrumentation associated with these systems is also discussed in those sections. As the auxiliary system components outside the Containment, as well as those inside the Containment, their instrumentation and power systems are not required for actuation of the Engineered Safety features; neither IEEE-279 nor the General Design Criteria apply.

Codes and Classifications

Table 6.2.1 tabulates the codes and standards to which the Safety Injection System components were designed.

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Service Life

All portions of the system located within the Containment were designed to operate without benefit of maintenance and without loss of functional performance for the duration of time the component is required. Per the 12/6/04 NRC generic SER on NEI 04-07 (Reference 14), evaluations of PWR post accident emergency recirculation performance to address the potential impact of debris blockage per GSI-191 (Reference 13) and Generic Letter 2004-02 (Reference 12) will use a mission time of 30 days.

6.2.2 System Design and Operation

System Description

Adequate emergency core cooling following a Loss-of-Coolant Accident is provided by the Safety Injection System as shown in Plant Drawings 9321-F-27353 and -27503 [Formerly Figures 6.2-1A & 6.2-1B]. The system components operate in the following possible modes:

- 1) Injection of borated water by the passive accumulators.
- 2) Injection of borated water from the Refueling Water Storage Tank with the safety injection pumps. (NOTE: Technical Specification Amendment 139 eliminates the requirement to maintain a boron injection tank.)
- 3) Injection by the residual heat removal pumps also drawing borated water from the Refueling Water Storage Tank.
- 4) Recirculation of spilled reactor coolant, injected water and Containment Spray System drainage back to the reactor from the recirculation sump by the recirculation pumps. (The residual heat removal pumps provide backup recirculation capability as described in Section 6.2.3.)

The initiation signal for core cooling by the safety injection pumps and the residual heat removal pumps is the safety injection signal which is actuated by any of the following:

Low pressurizer pressure (2/3)

High containment pressure (2/3, High Pressure)

High differential pressure between any other two steam generators (2/3)

After time delay (maximum of 6 seconds): high steam flow in any two of the four steam lines (1/2 per line) coincident with low T_{avg} (2/4) or low steam pressure (2/4)

Manual Actuation

High-High containment pressure (two sets of 2/3, High-High pressure) [energize to actuate]

In the Technical Specifications, limits are set on minimum number of operable channels and required plant status for all reactor protection and ESF instrumentation.

Injection Phase

The principal components of the Safety Injection system which provide emergency core cooling immediately following a loss of coolant are the accumulators (one for each loop), the three safety injection (high head) pumps and the two residual heat removal (low head) pumps. The safety injection and residual heat removal pumps are located in the Primary Auxiliary Building.

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The accumulators, which are passive components, discharge into the cold legs of the reactor coolant piping when pressure decreases below the N₂ cover gas operating pressure (approximately 650 psig), thus rapidly assuring core cooling for large breaks. They are located inside the Containment, but outside the crane wall; therefore, each is protected against possible missiles.

The safety injection signal starts the safety injection and residual heat removal pumps and opens the Safety Injection System isolation valves (certain valves have their motor leads disconnected and are locked open). The valves on Plant Drawings 9321-F-27353 and -27503 [Formerly Figures 6.2-1A & -B] marked with a “S” receive the safety injection signal.

Separate and independent key-lock switches one for each SI train are provided in series to each of the auto SI actuation relays to allow manual blocking of the automatic Engineered Safeguards System actuation when the unit is in cold shutdown.

The operation of the key-lock switches into the “defeat” position will activate the existing separate annunciation for each train (Safeguard Train “A” in test and Safeguard Train “B” in test) and separate status lights (one for each train) in the Control Room. While the operator can deactivate the alarm, the individual status lights and the alarm windows will stay lit as long as the key-lock switches are in the defeat position.

The considerations involved insure that:

- 1) The operation of the key-lock switch to defeat the auto SI is normally carried out during the plant conditions which do not require the actuation of auto SI.

The key-lock switch will be used only during normal plant operation, with the plant in the cold shutdown condition. The Technical Specifications do not require the operability of the SI system or any of its components during the cold shutdown conditions.

- 2) The operation of the key-lock switch to defeat auto SI is also permitted following an SI activation if the normal method or resetting SI is unavailable. This action is required to restore control of plant equipment to the operators.
- 3) Annunciation devices are provided to augment the administrative procedures.

The operation of the key-lock switch will activate the individual annunciations and individual status lights. During the time auto SI is in the “defeat” position, the “alarm windows” and the status lights will stay lit.

The safety injection pumps (high head) deliver borated water to two separate discharge headers. The flow from each header can be injected into each of the three available cold legs (one of four cold leg lines per header has been permanently isolated by locking closed valves SI-856A on 2” Line #56 and SI-856F on 1-½” Line #754, as evaluated in Reference 2) and one hot leg of the Reactor Coolant System. Isolation valves in each of the three available cold leg injection lines are open and valves in the hot leg injection lines are closed during normal plant operation. The hot leg injection lines are provided for later use during hot leg recirculation following a reactor coolant pressure boundary break.

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One high head injection header contains the retired-in-place Boron Injection Tank (BIT), which formerly contained concentrated boric acid for rapid insertion of negative reactivity in the safety injection mode. A modification replaced the contents of the BIT with water from the Refueling Water Storage Tank (RWST), (Reference 3).

NOTE: Technical Specification Amendment 139 eliminates the requirement to maintain a BIT.

However, the BIT is an in-line, passive component of the Safety Injection System, therefore it is only “functionally eliminated,” but not physically. Furthermore, in the event of a safety injection scenario, the BIT will continue to “function” in a passive mode, to convey refueling water to the reactor core.

No credit is taken for any boron concentration in the BIT, or in any Safety Injection piping downstream of the RWST.

The BIT inlet and outlet isolation valves, (two pairs of motor operated valves, each pair arranged in parallel), are maintained in the open position, as their function to isolate the BIT is not required since implementation of the BIT elimination modification (References 2 through 5). Maintaining the BIT isolation valves open provides the benefits of eliminating an active safety function and potentially minimizing the time delay in delivery of safety injection flow. The BIT isolation valves may be individually closed for testing (one of each pair at a time) during normal power operation. Only one inlet isolation valve (SI-1852A or B) and one outlet isolation valve (SI-1835A or B) must be open to achieve the emergency core cooling safety function.

However, closing a single BIT isolation MOV presents the potential for loss of the function of the BIT header should a coincident spurious or inadvertent closure of the parallel BIT isolation MOV occur. Spurious or inadvertent mis-positioning of MOVs are considered to be credible single failures. When configured with both parallel BIT inlet or outlet MOVs closed simultaneously, the motor actuators’ calculated capabilities lack the opening margin required by the GL 89-10 program. Therefore, in accordance with the IP3 GL 89-10 program, if any of the BIT isolation valves are to be closed in support of maintenance or testing, then the potential for loss of BIT header function via closure of the parallel valve (as caused by any reason including single failure) must be eliminated by administrative means.

A Safety Injection Signal still generates a signal to open the BIT isolation valves. However, based on the limited margin available in the capabilities of the motor actuators of these valves, opening in response to an SI signal would require modification in order to meet the margins required under the GL 89-10 program. Such modifications are unnecessary provided the normal position of the BIT isolation valves is open.

While refueling water has relatively low boron concentration (nominally 2,500 ppm), analyses performed to support implementation of the modification, assumed zero boron concentration in the BIT and associated piping, for conservatism. The Westinghouse “Revised Feasibility Report for BIT Elimination for Indian Point Unit 3,” (July 1988) determined that the concentration of boron in the BIT may be reduced to that in the RWST while continuing to meet applicable safety criteria.

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The high-head safety injection system is configured as follows:

1. The three available cold leg (one of the four cold leg lines has been permanently isolated by locking closed valve SI-856F on 1-½" Line #754) injection lines on the discharge header containing the retired-in-place BIT are physically connected to the reactor coolant pressure boundary.
2. The three available cold leg (one of the four cold leg lines has been permanently isolated by locking closed valve SI-856A on 2" Line #56) injection lines on the Non-BIT discharge header are physically connected to the accumulator discharge lines upstream of the reactor coolant pressure boundary.
3. The two hot leg injection lines on both discharge headers are physically connected to the reactor coolant pressure boundary.

This configuration was implemented in a modification installed during the 3R13 Refueling Outage to accommodate Stretch Power Uprate to provide for Hot Leg Switchover (HLSO) prior to 6.5 hours following a LBLOCA, and to resolve sump particle and ECCS valve erosion concerns identified in NRC Information Notice 96-27 and 97-76.

Since a small break in the reactor coolant pressure can include a cold leg injection line, safety injection flow capability can be limited by the resulting flow from only five available intact cold leg (Note: one of the original four cold leg lines per header has been isolated by a locked closed valve) injection lines. Depending on the assumed single failure, either two or three safety injection pumps can be operating. To maximize the fraction of safety injection flow delivered to the reactor coolant system with a broken cold leg injection line, the six available cold leg (Note: one of the original four cold leg lines per header has been isolated by a locked closed valve) injection lines are flow balanced to within an allowable range. The resulting system flow capability is sufficient for the makeup of coolant following a small break that does not immediately depressurize the reactor coolant system to the accumulator discharge pressure. Credit is not taken for operator action to isolate a broken cold leg injection line.

For large breaks, the Reactor Coolant System would be depressurized and voided of coolant rapidly (about 26 seconds for the largest design break) and a high flow rate is required to quickly recover the exposed fuel rods and limit possible core damage. To achieve this objective, one residual heat removal pump and two safety injection pumps are required to deliver borated water to the cold legs of the reactor coolant loops. Two pumps are available in order to provide for an active component failure. Delivery from these pumps supplements the accumulator discharge. Since the Reactor Coolant System back pressure is relatively low (rapid depressurization for large breaks), a broken injection line would not appreciably change the flows in the other injection lines delivering to the core.

The residual heat removal pumps take suction from the refueling water storage tank.

Because the injection phase of the accident is terminated before the refueling water storage tank is completely emptied, all pipes are kept sufficiently filled with water before recirculation is initiated to ensure the systems remain operable and perform properly. Water level indication and alarms on the refueling water storage tank give the operator ample warning to terminate the injection phase. Additional level sensors are provided in the containment sump which also give backup indication when injection can be terminated and recirculation initiated.

Recirculation Phases

After the injection operation, coolant spilled from the break and water collected from the containment spray is cooled and returned to the Reactor Coolant System by the recirculation system.

Following a Loss-of-Coolant Accident (LOCA), sampling is accomplished as necessary from outside of the Containment via the sampling connection from the recirculating pump discharge.

When the break is large, depressurization occurs due to the large rate of mass and energy loss through the break to Containment. In the event of a large break, the recirculation flow path is within the Containment. The system is arranged so that the recirculation pumps take suction from the recirculation sump in the containment floor and deliver spilled reactor coolant and borated refueling water back to the core through the residual heat exchangers. The system is also arranged to allow either of the residual heat removal pumps to take over the recirculation function. The residual heat removal pumps would only be used if backup capacity to the internal recirculation loop is required as described in Section 6.2.3. Water is delivered from the Containment to the residual heat removal pumps from a separate sump inside the Containment.

Although the residual heat removal pump is an acceptable alternative for providing core cooling and containment spray flow in lieu of the recirculation pump, there is no single failure that would require its use. The residual heat removal pump(s) would be used only in scenarios beyond the design basis involving multiple active failures. Use of a residual heat removal pump during the long-term recovery phase could be required in the event of ECCS leakage outside Containment.

The motor operated valves in the recirculation suction lines from the containment sump are maintained in the normally closed position at all times, however, they could be opened to allow for residual heat removal pump recirculation operation if that mode was required.

The valves are exercised in accordance with Technical Specification requirements. The valves are operated one at a time and each valve is returned to its normal position before exercising the next one.

No automatic opening features are provided; hence, the probability of a spurious signal to open the valves is nil. The only time these valves are opened is for periodic testing and the procedure ensures that both valves are closed immediately after the test. In addition, the two valves are provided in series to protect against the inadvertent opening of one valve.

The procedure used for periodic testing of these valves ensures that the only water which would be drained from these lines is the small amount trapped between the two valves. This water will discharge to the containment sump. The sump contains two sump pumps which operate on level control and will periodically pump the sump contents to the waste holdup tank during normal plant operation.

For small breaks the depressurization of the Reactor Coolant System is augmented by steam dump and auxiliary feed water addition to the Steam System. For the small breaks in the Reactor Coolant System where recirculated water must be injected against higher pressures for long term core cooling, the system is arranged to deliver the water from the residual heat exchangers to the high-head safety injection pump suction and, by this external recirculation

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route, to the reactor coolant loops. Thus, if depressurization of the Reactor Coolant System proceeds slowly, the safety injection pumps may be used to augment the flow-pressure capacity of the recirculation pumps in returning the spilled coolant to the reactor.

The recirculation pumps, the residual heat exchangers, piping and valves vital to the function of the recirculation loop are located in a missile-shielded space inside the polar crane support wall on the west side of the reactor primary shield.

There are two recirculation related sumps within the Containment, the recirculation sump and the containment sump. Both sumps collect liquids discharged into the Containment during the injection phase of the design basis accident.

As part of the resolution of GSI-191 and Generic Letter (GL) 2004-02, various flow barriers are installed in the Vapor Containment to channel the recirculation flow into the Reactor Cavity Sump area, up and out of the Incore Instrumentation Tunnel, through the Crane Wall and VC Sump labyrinth wall via specially designed openings, and into the annulus area outside the Crane Wall. The recirculation flow will migrate towards the Recirculation Sump or the Containment Sump depending on which pump(s) are operating. Flow channeling barriers are installed on the Reactor Cavity Sump platform el. 29' -4" around the Incore Instrumentation Tunnel, on the Recirculation Sump trenches, and at the Containment Sump. Flow channeling barrier doors are installed in the northeast and northwest quadrant openings of the Crane Wall. In addition, flow channeling barrier doors are installed in the north and south entrances to the Recirculation Sump area. Perforated plate is installed directly above the Recirculation Sump cubicle on the RHR Heat Exchanger 66' -0" platform to preclude debris from washing through the existing grating and directly into the Sump area. Forcing the recirculation flow path through the Reactor Cavity Sump area (which is a low velocity zone) induces larger debris to settle out and minimizes its transport to the Sumps.

The Recirculation and Containment Sumps strainers consist of a matrix of multi-tube top-hat modules, which are fabricated from perforated stainless steel plate and mounted in the horizontal position. The modules are of four different lengths to satisfy physical configuration constraints of each Sump. The perforated plate possesses 3/32" diameter holes sized to limit downstream effects. Each module has four (4) layers of perforated surface for straining debris from the sump fluid. These layers are essentially concentric perforated metal tubes of decreasing diameter arranged in two (2) pairs. The modules feature an internal vortex suppressor which prevents air ingestion into the piping system. Furthermore, stainless steel mesh has been installed between each pair of perforated plate tubes to minimize fibrous debris bypass through the strainer. The top-hat modules are attached to strainer water boxes. Frame structures supporting sections of grating are installed above the Internal Recirculation and Containment Sump strainers providing for additional vortex suppression function.

The Recirculation Sump relies on two (2) connected water boxes with 249 top-hat modules in the sump pit for the purpose of preventing particles greater than 3/32" in diameter from entering the suction of the Recirculation Pumps. The Recirculation Sump strainer has an effective surface area of approximately 3156 square feet and an effective interstitial volume of approximately 471 cubic feet. Water will enter the top-hat modules through the cylindrical perforated plates and flow through the stainless steel mesh inside either of the two (2) annuli flow paths within each top-hat module. Upon exiting the modules, water will flow into the strainer water boxes, then over the Sump weir wall, into the Sump pump bay towards the Recirculation Pumps. The water approach velocity to the Recirculation Sump is less than one foot per second.

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The Containment Sump relies on a water box with 51 top-hat modules of varying size located in the Sump pit for the purpose of preventing particles greater than 3/32" in diameter from entering the line from the Sump to the RHR Pump suction. The Containment Sump strainer has an effective area of approximately 1058 square feet and an effective interstitial volume of approximately 134 cubic feet. Water will enter the top-hat modules through the cylindrical perforated plates and flow through the stainless steel mesh inside either of the two (2) annuli flow paths within each top-hat module. Upon exiting the modules, water will flow into the strainer water box, which is directly connected to the RHR Pump suction line. The water approach velocity to the Containment Sump is less than one foot per second.

Each sump strainer is qualified to handle the post-LOCA design basis accident debris loads predicted by the mechanistic evaluations required by GL 2004-02. There are two classifications for the debris generated by an RCS break: 1) conventional debris (e.g., insulation, tags, coatings, dust and dirt), and 2) chemical debris (principally the precipitation of Aluminum based compounds Sodium Aluminum Silicate and Aluminum Oxy Hydroxide) which are conservatively predicted by use of a model detailed in WCAP-16530-NP-A (Reference 8). An Argonne National Laboratory (ANL) formula was used to predict the post-LOCA chemical precipitation temperature. The precipitation temperature is determined from the post-accident containment sump pool conditions (Aluminum concentration, temperature and pH). Chemical precipitants are not predicted to develop prior to the required switchover to hot-leg recirculation. Consequently, the internal recirculation sump strainer qualification uses predicted head losses associated with conventional debris loads up to the switchover to hot-leg recirculation and then conventional and chemical debris loads after the transfer to hot-leg recirculation occurs when reduced sump flow rates are expected to be less than two HHSI pumps at runout (2 x 675 GPM). The internal recirculation sump strainers are qualified for a GL 2004-02 defined 30-day mission time. The containment sump strainers were qualified using the same methodology but are qualified from 24 hours post large break LOCA until the end of the 30 day mission time. The containment sump is not required to handle the same full debris loads at the start of the recirculation phase as the recirculation sump since the only postulate failure that would require its use is a passive failure, which is only postulated after 24 hours into the event (reference Technical Specification Amendment #238). However, to maintain redundancy for the more probable small break LOCAs, the containment sump strainers have been qualified for 6 inch diameter breaks and smaller from the start of the recirculation phase. A condition of Amendment #238 was that the Emergency Operating Procedures continue to utilize the containment sump as an alternative path should both the recirculation sump trains become unavailable.

As identified above in the strainer descriptions, both sump strainers are constructed of concentric cylindrical tubes perforated with 3/32" diameter holes and have stainless steel mesh behind the perforations to reduce the quantity of fine fibers able to pass through the strainer perforation, although some fine fibers and particulates may still pass through the strainer. The passive sump strainers provide adequate protection to the downstream components from the majority of the accident generated debris. As part of the resolution of GL 2004-02, an analysis of the components downstream of the strainers required for accident mitigation was performed to ensure satisfactory operation for the defined 30 day mission time. Pumps, isolation and throttle valves, orifices, instrument connections, and piping were examined using guidance provided by Revision 1 of WCAP-16406 (Reference 9) with justification provided for any methodology deviations. All equipment was found to have sufficient clearances: to allow passage of debris, to limit blockage to an acceptable level, and / or to have sufficient resistance to wear as to not affect their function for the defined 30 day mission time. Chemical effects on

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the fuel elements were also examined and not predicted to interfere with heat transfer per analysis based on WCAP-16793-NP (Reference 10).

Per the 12/6/04 NRC generic SER on NEI 04-07 (Reference 14), evaluations of PWR post accident emergency recirculation performance to address the potential impact of debris blockage per GSI-191 (Reference 13) and Generic Letter 2004-02 (Reference 12) will use a mission time of 30 days.

The low head external recirculation loop via the containment sump line and the residual heat removal pumps provides backup recirculation capability to the low head internal recirculation loop. The containment sump line is contained within a concentric guard pipe which is connected to the containment liner and terminates within a leak tight compartment. This sump line has two remote motor operated normally closed valves for containment isolation purposes, one of which is within this leak tight compartment.

The high head external recirculation flow path via the high head safety injection pumps is required for the range of small break sizes for which the Reactor Coolant System pressure remains in excess of the shutoff head of the recirculation pumps at the end of the injection phase. The recirculation pumps, or the residual heat removal pumps if backup capability is required, are also used to provide flow to the high head safety injection pumps during hot leg recirculation.

The external recirculation flow paths within the Primary Auxiliary Building are designed so that external recirculation can be initiated immediately after the accident. Those portions of the Safety Injection System located outside of the Containment which are designed to circulate under post-accident conditions radioactively contaminated water collected in the Containment meet the following requirements:

- Shielding to maintain radiation levels within the guidelines set forth in 10 CFR 100
- Collection of discharges from pressure relieving devices into closed systems
- Means to detect and control radioactivity leakage into the environs to the limits consistent with guidelines set forth in 10 CFR 100.

This criterion is met by minimizing leakage from the system. External recirculation loop leakage is discussed in Section 6.2.3.

One recirculation pump and one residual heat exchanger of the recirculation system provides sufficient cooled recirculated water to keep the core flooded with water by injection through the cold leg connections while simultaneously providing, if required, sufficient containment spray flow to prevent the containment pressure from rising above design limits because of the boil-off from the core. These systems are kept sufficiently filled with water to ensure the systems remain operable and performs properly. Only one pump and one heat exchanger are required to operate for this capability at the earliest time recirculation is initiated. The system is also arranged to allow either of the residual heat removal pumps to take over the recirculation function following a passive failure as defined in Section 6.2.3. This design ensures that heat removal from the core and Containment is effective in the event of a pipe or valve body rupture.

Cooling Water

The Service Water System (Section 9.6.1) provides cooling water to the component cooling loop, which in turn, cools the residual heat exchangers, all of which are part of the Auxiliary Cooling Systems (Section 9.3). Three conventional service water pumps are available to take

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suction from the river and discharge to the two component cooling heat exchangers. Three component cooling pumps are available to discharge through their heat exchangers and deliver to the two residual heat exchangers. With the component cooling water system in long term recirculation mode, the following components are required in order to meet core cooling requirements, one residual heat removal pump and heat exchanger, one component cooling water pump, one component cooling water heat exchanger, one service water pump on the nonessential header, and two essential service water pumps on the essential header. All of this equipment with the exception of the residual heat exchangers is located outside Containment.

Containment Building Water Level Monitoring

Continuous indication of containment water level during and after an accident is provided by three systems with redundant measuring loops distributed as follows:

- Containment Sump (El. 38' 3"), narrow range, 0' to 10' of water.
- Recirculation Sump (El. 34' 0"), narrow range, 0' to 14' of water.
- Containment Building (El. 46' 0"), wide range, 0' to 8' of water.

Each loop consists of a sensor and a transmitter located inside the containment building, a recorder and power supply at the control room. Refer to Plant Drawing 9321-F-27353 [Formerly Figure No. 6.2-1A].

Change-Over from Injection Phase to Recirculation Phase

Assuming that the three high head safety injection pumps, the two residual heat removal pumps, and the two containment spray pumps (Section 6.3) are running at their maximum capacity, the time sequence for the changeover from injection to recirculation in the case of a large rupture beginning from the time of the safety injection signal:

In approximately ten minutes, sufficient water has been delivered to provide the required NPSH to start the recirculation pumps.

In approximately 15 to 20 minutes, (1) one of two low level alarms on the RWST sounds, and the redundant containment recirculation sump level indicators show the sump water level. The alarm serves to alert the operator to start the switchover to the recirculation mode. The redundant containment recirculation sump level indicators provide verification the RWST water has been delivered during the injection phase, in addition to providing consideration to the case of a spurious (i.e., early) RWST low level alarm. The operator would see on the control board that the redundant recirculation sump level indications are at the appropriate points; switch-over to the recirculation phase of safety injection is performed at this time.

With the initiation of the switch sequence (e.g., Switch No. 1), only one spray pump will continue in operation. This spray pump will continue to draw from the RWST for approximately 25 minutes.

Recirculation pump motors are 2'-2" above the highest water level after addition of the injected water to the spilled coolant.

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The entire switchover from injection to recirculation phase is carried out by manually initiating equipment starts/stops and closing a series of switches (each of which carries out several operations) located in the Control Room. At only two points in the switchover routine is any reliance on instrumentation necessary:

- 1) When the low level alarm occurs from the refueling water storage tank low level (LT-920 and/or LIC-923 outside containment), the operator is alerted to begin closing the series of recirculation switches. The low level alarm for each instrument is set to actuate when there is between 10.5 feet and 12.5 feet of water in the tank.
- 2) After closing switch 4, the operator is required to make a decision whether to close switch 5 or switch 6. The basis for this decision is the flow reading on the flow meters FT-946A, 946B, 946C and 946D. If three or more of these flow meters each indicate greater than zero and the lowest of these readings is at least 360 gpm, ± 10 gpm, the operator will close switch 6; otherwise, the operator will close switch 5.

Analysis indicates that approximately 662 gpm to the core is required to match boil-off at 1398 seconds (the earliest time at which recirculation could be initiated). This includes a 20% penalty to allow for the effects of hot metal quenching. The flow rates that follow ensure an actual flow of ≥ 662 gpm. Accordingly, a requirement of 360 gpm, ± 10 gpm minimum flow rate on the lowest indicating loop has been specified to account for uncertainties in flow measurement and to provide margin.

The decision making process with regard to the flow to the Reactor Coolant System via the low head injection lines is based on readings of the four injection line flowmeters. The rationale for this basis is the following:

For four flow meters each reading greater than zero (i.e., none indicating zero flow):

- 1) Assume one flow meter fails to an inaccurate high reading, (as a result of a single failure); if the flow rate reads greater than 360 gpm, ± 10 gpm then this meter is not used as a basis for the 360 gpm, ± 10 gpm setpoint, but rather, the lowest indicating meter (greater than 0 gpm) is used.
- 2) Of the four injecting lines, the highest flow line is assumed to be connected to the spilling line; therefore, flow from this line is ineffective.
- 3) For the three remaining intact lines, their total flow of 751 gpm is delivered to core; if at least 360 gpm, ± 10 gpm is indicated by the lowest line, total flow requirement of 662 gpm is satisfied using low head recirculation.

For one (or two) flow meters each reading greater than zero (i.e., two indicating zero flow):

- 4) Assume failure of one or two flow meters due to loss of common power supply (i.e., single failure). If the flow rate reads greater than 360 gpm, ± 10 gpm then this meter is not used as a basis for the 360 gpm, ± 10 gpm setpoint, but rather, the lowest indicating meter (greater than 0 gpm) is used.
- 5) Of the four injecting lines, the highest flow line is assumed to be connected to the spilling line; therefore, flow from this line is ineffective.

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- 6) For the three remaining intact lines, their total flow of 751 gpm is delivered to the core; if at least 360 gpm, ± 10 gpm is indicated by the lowest line; total flow requirement of 662 gpm is satisfied using low head recirculation.

Thus, the entire recirculation switchover sequence requires only the aforementioned instrumentation. Manual switchover, that is, without use of the "eight-switch sequence," does not require any additional instrumentation; it requires only that the operator close a switch for each and every operation in the switchover sequence.

The control circuitry for the associated valves and pumps is located external to the Containment. The motor operators, associated power cables, and instrumentation inside the Containment have been designed to withstand the LOCA environment as stated in Appendix 6F.

Several motor operated valves operated during the transfer to cold leg or hot leg recirculation are maintained de-energized in their safeguards position during normal power operation in accordance with the Technical Specifications. The subject valves are 856B, 856G, 1810, 882, 744, 842, 843, 883, 1870, 743, 894A, 894B, 894C, and 894D. Each valve (except for the submerged 894C) may be energized during or following the transfer to recirculation at a point in time when spurious or inadvertent mispositioning would not defeat a safety function relied upon to mitigate the consequences of the event.

The manual switchover by the operator which accomplishes the changeover from injection to recirculation is listed below. This switchover takes place when the level indicator or level alarms on the refueling water storage tank indicates that the fluid has been injected. The level indicators in the containment sump will verify that the level is sufficient within the Containment. The sequence is followed regardless of which power supply is available. The time required to complete the switchover to recirculation is the time for the switch gear to function. All the recirculation switches are grouped together on the safeguard control panel. The service water pumps and component cooling water pumps are located on the auxiliary coolant panel. The component position lights verify when the function of a given switch has been completed. Should an individual component fail to respond, the operator can take corrective action to secure appropriate response from the back-up component.

The following sequence maintains the loads on the 480V buses within analyzed limits, maintains sufficient core cooling flow during and following the transfer to recirculation and ensures that components are operated within their analyzed limits. While this sequence does not attempt to mirror each procedural step, the major steps listed below must be performed in the sequence described:

- 1) Terminate safety injection actuation signal and containment spray actuation signal in order that the control logic permits manipulation of the system (at any time following completion of the auto start sequence)
- 2) Close switch one (remove and isolate unnecessary loads from the diesels).

Trips high head safety injection pump No. 32 if all three are operating (no action if two are operating). Isolates pump No. 32 from the Refueling Water Storage Tank.

Trips spray pump No. 32 if both are operating (no action if only one is operating). Closes isolation valve at the inoperative spray pump discharge.

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- 3) Close switch three (remove and isolate unnecessary loads from the diesels).
Trips both residual heat removal pumps.

Closes isolation valves at pump suction and discharge headers (the Technical Specifications require the motor operators for these valves to be de-energized).

- 4) Secure electric auxiliary feedwater pumps prior to closing switch two.
a) If continued Auxiliary Feedwater flow is required, the turbine driven pump is used.

If continued, Auxiliary Feedwater flow is required and the turbine driven pump is unavailable, only one motor driven Auxiliary Feedwater pump may be run.

- 5) Close switch two (establish cooling flow for Residual Heat Exchangers)
a) Starts on one non-essential service water pump (the second or third pump is given a start signal if the first or second pump fails to start).
b) Starts one component cooling water pump (the second or third pump is given a start signal if the first or second pump fails to start).

- 6) Manually initiate internal recirculation flow.

- a) Manually start recirculation Pump A (if Pump A fails to start, use manual start for Pump B; Pump B control switch is adjacent to switch four).
b) Close switch four to open valves on discharge of recirculation pumps. Starting a Recirculation Pump prior to closing switch four minimizes the potential pressure differential across these motor operated valves.
c) Valves SI-HCV-638 and / or SI-HCV-640 are throttled to maintain recirculation flow. For one pump operation, throttling is required to maintain recirculation pump flow within maximum pump flow limits.

- 7) Check Flow to Reactor Coolant System via the low head injection lines.

- a) For the preferred operating mode of omitting switch five and closing switch six (i.e., provides recirculation at low system pressure), the following flow conditions must be verified:
1) With flow in three or more lines greater than zero, the lowest of these flows is at least 360 gpm, \pm 10 gpm.
b) If the above flow conditions are met, the following actions are taken:
1) Direct operators in the field to throttle service water valves SWN-35-1 and 35-2 to maintain CCW temperature within prescribed limits.
2) Close switch six, which trips operating safety injection pumps.
c) If the above flow conditions are not verified, close switch five and omit switch six (provides recirculation at elevated system pressure).
1) Aligns flow from residual heat exchanger to high head safety injection pumps. (The motor-operated valves on the outlet of the residual heat

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exchangers to the suction of the high-head safety injection pumps are opened. The motor-operated valves on the outlets of the residual heat exchangers to the low-head injection lines are closed together with the safety injection pump mini-flow and residual heat removal pump mini-flow).

- 2) Direct operators in the field to throttle service water valves SWN-35-1 and 35-2 to maintain CCW temperature within prescribed limits.
- 8) Close switch seven
 - Starts a second non-essential service water pump.
 - Starts a second component cooling water pump only if the second service water pump successfully started.
 - Starts a second recirculation pump only if the second component cooling water pump successfully started. Note: Running two recirculation pumps is restricted to Low head Recirculation. If High Head Recirculation is required, operator action is taken to prevent two recirculation pumps from operating simultaneously.
- 9) Close switch eight (complete the isolation of the safety injection system and containment spray system test lines to the refueling water storage tank).
 - a) Close the valve on the spray test line.
 - b) Close the valve in the safety injection pumps suction line from the Refueling Water Storage Tank (control power for this valve is de-energized as required by the Technical Specifications).

If an RHR pump is used for low head recirculation, then valves SI-HVC-638 and/or SI-HCV-640 are throttled to maintain RHR pump flow to the cold legs (and recirculation spray) less than the maximum pump flow limit. Section 9.6.1 describes additional requirements to be met relating to alignment and operation of the service water system at the beginning of the post- LOCA recirculation phase.

Although the listed recirculation switches are manual, each automatically causes the operations listed. An indicating lamp is provided to show the operator when the operations of a given switch have been performed and when he should proceed with the next switching operation. In addition, lamps indicating completion of the individual functions for a given switch are provided. These lamps are adjacent to the switches. The time required to complete the switchover is just the time for the switch gear to operate. Should an individual component fail to respond, the operator can take corrective action to secure appropriate response from controls within the Control Room. Remote operated valves for the injection phase of the Safety Injection System (Table 6.2-11) which are under manual control (that is, valves which normally are in their ready position and do not receive a safety injection signal) have their positions indicated on a common portion of the control board. At any time during operation when one of these valves is not in the ready position for injection, it is shown visually on the board. Reference is made to Table 6.2-11 which is a listing of the instrumentation readouts on the control board which the operator can monitor during recirculation. In addition, an audible annunciation alerts the operator to the condition.

Hot leg recirculation is initiated after 4 hours but prior to 6.5 hours.

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Location of the Major Components Required for Recirculation

The residual heat removal pumps are located in the residual heat removal pump of the Primary Auxiliary Building (El. 15'). The residual heat exchangers are located on a platform above the basement floor of the Containment Building (El. 66').

The recirculation pumps are located directly above the recirculation sump in the Containment Building (El. 46').

The component cooling pumps and heat exchangers are located in the Primary Auxiliary Building (El. 41' and 73', respectively).

The service water pumps are located in the intake structure and the redundant piping to the component cooling heat exchangers is run underground.

Steam Break Protection

A large break of a steam system pipe rapidly cools the reactor coolant causing insertion of reactivity into the core and depressurization of the system. Compensation is provided by injection of borated water from the refueling water storage tank (RWST). Redundant isolation valves open upon a safety injection signal, providing a supply of borated water with a boron concentration of 2500 ppm nominally. Even assuming all of the safety injection lines downstream of the RWST, including the BIT, contain unborated water, this is sufficient to terminate the reactor power transient before any clad damage results. The analysis of the steam line rupture accident is presented in Section 14.2.5.

Components

All associated components, piping, structures, and power supplies, of the Safety Injection System were designed in accordance with the seismic criteria provided in Section 16.1.1 and were predominately designated as seismic Class 1. Refer to Plant Drawing 9321-F-27353 and -27503 [Formerly Figures 6.2-1A and 1B] for indication of the seismic class piping boundaries.

All components inside the Containment are capable of withstanding or are protected from differential pressure which may occur during the rapid pressure rise to 47 psig in 10 seconds.

Emergency core cooling components are austenitic stainless steel, and hence, are quite compatible with the spray solution over the full range of exposure in the post-accident regime. [Deleted] Corrosion tests performed with simulated spray (original NaOH buffer additive) showed negligible attack, both generally and locally, in stressed and unstressed stainless steel at containment and ECCS conditions. These tests are discussed in WCAP-7153⁽¹⁾. Corrosion tests performed with several buffering agents showed corrosion to submerged aluminum is higher in the presence of sodium tetraborate compared to NaOH but was not excessive, and corrosion to submerged steel in sodium tetraborate was comparable to NaOH. These tests are discussed in WCAP-16596-NP.

The quality standards of all Safety Injection System components are tabulated in summary form in Table 6.2-12.

Accumulators

The accumulators are pressure vessels filled with borated water and pressurized with nitrogen gas. During normal plant operation each accumulator is isolated from the Reactor Coolant System by two check valves in series. Should the Reactor Coolant System pressure fall below the accumulator operating pressure, the check valves open and borated water is forced into the Reactor Coolant System. Mechanical operation of the swing-disc check valves is the only action required to open the injection paths from the accumulators to the core via each cold leg.

Indian Point 3 does not utilize hot leg injection. No timer is involved or provided. The two hot leg connections are provided to allow hot leg recirculation. However, these connections are closed at all times during plant operation.

The level of borated water in each accumulator tank is adjusted remotely as required during normal plant operation. During normal plant operation, the fluid level can be reduced by draining through the Sampling System to the Sample Sink in the PAB. The water level can also be reduced by draining to the reactor coolant drain tank or to the VC sump; however, these drain paths degrade the accumulator function by exposing the affected accumulator(s) to non-seismic piping from which it can not be isolated in accordance with design criteria. Draining accumulators to the Reactor Coolant Drain tank or the VC sump may only be performed under the conditions delineated by the plant Technical Specifications. To increase and/or maintain the accumulator water level, refueling water is added using a safety injection pump. Samples of the solution in the tanks are taken at the sampling station for periodic checks of boron concentration.

The accumulators are passive Engineered Safety Features because the gas forces injection; no external source of power or signal transmission is needed to obtain fast-acting, high flow capability when the need arises. One accumulator is attached to each of the cold legs of the Reactor Coolant System.

The design capacity of the accumulators is based on the assumption that flow from one of the accumulators spills onto the containment floor through the ruptured loop. The flow from the three remaining accumulators provides water after the end of blowdown, to reflood the core. (Section 14.3)

The accumulators are carbon steel, internally clad with stainless steel and designed to ASME Section III, Class C. Connections for remotely draining or filling the fluid space during normal plant operation are provided.

Redundant level and pressure indicators are provided with readouts on the control board. Each indicator is equipped with high and low level alarms.

For the Accumulator Discharge Valves (894 A, B, C, D), the following indications are provided to supervise the administrative procedures and to highlight the existence of an incorrect configuration:

- 1) Red (open) and Green (closed) position indicating lights at the control switch for each valve. These lights are powered by valve control power and actuated by valve motor operator limit switches.

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- 2) An additional indicating system of lights is used, whereby each valve has a two light sugar cube. The right side of the cube is a WHITE light (which glows PINK if the adjacent RED light is lit) that indicates power applied to the indicating system; the left side of the cube is a RED light to indicate when the respective valve is in its proper position enabling safeguards operation. This grouping highlights a valve not properly lined up. These lights are energized from a separate monitor light supply and the RED light is actuated by a valve motor operator limit switch.
- 3) In the event a valve is closed for accumulator or valve testing at the time injection is required, a safety injection signal is applied to open the valve (if power is available), overriding the test closure.

Prior to commercial operation, the AEC required that the electric power to these valves be locked out to prevent a spurious closure. The lockout will be implemented whenever RCS temperature is above 350°F. These valves are closed during plant shutdown conditions to isolate the pressurized accumulators from the depressurized reactor coolant system.

The accumulator design parameters are given in Table 6.2-2.

Boron Injection Tank

The Boron Injection Tank (BIT) is “functionally” retired-in-place. That is, it is no longer relied upon to provide concentrated boric acid for injection into the reactor core during emergency core cooling. It does, however, remain a passive component of the Safety Injection System, and as such, it is relied upon for its properties as a pressure vessel. Because the BIT no longer contains concentrated boric acid, the specialized handling requirements associated with that substance, such as heating and recirculation, no longer need to be met. The heaters which reside at the bottom of the BIT have been permanently de-energized. Furthermore, the recirculation flowpath between the BIT and the Boric Acid Storage Tanks has been valved off.

The BIT inlet and outlet isolation valves (two pairs of motor operated valves, each pair arranged in parallel) are maintained in the open position, as their function to isolate the BIT is not required since implementation of the Reference 3 modification. A Safety Injection Signal still generates a signal to open the BIT isolation valves. However, based on the limited margin available in the capabilities of the motor actuators of these valves, opening in response to a SI signal would require modification in order to meet the margins required under the GL 89-10 program. Such modifications are unnecessary provided the normal position of the BIT isolation valves is open.

The BIT remains in the safety injection flowpath, and continues to be relied upon to convey the water contained in it, as well as water from the Refueling Water Storage Tank, in the same manner as a section of piping would. Although the BIT contents are identical to the contents of the RWST, that is, borated water with a nominal boron concentration of 2,500 ppm, no credit is taken by the core response analyses for any boron in the BIT, or the safety injection piping downstream of the RWST, for conservatism.

The design parameters of the BIT are presented in Table 6.2-3.

Refueling Water Storage Tank

In addition to its normal duty to supply borated water to the refueling canal for refueling operations, this tank provides borated water to the safety injection pumps, the residual heat removal pumps and the containment spray pumps for the Loss-of-Coolant Accident. These systems are kept sufficiently filled with water to ensure the system remains operable and performs properly. During plant operation, it is aligned to these pumps.

The capacity of the refueling water storage tank is based on the requirement for filling the refueling canal. When filled to Technical Specification requirements, approximately 342,200 gallons is available for delivery. One low level alarm is set to actuate at between 10.5 feet and 12.5 feet of water in the tank. This tank capacity and these alarm settings provide an amount of borated water to assure:

- 1) A sufficient volume of water on the floor to permit the initiation of recirculation (195,800 gal).
- 2) A volume sufficient to allow switchover to recirculation pumps, containment pressure relief, and sump pH control via containment spray system following a reactor coolant pressure boundary break (66,700 gal).
- 3) Adequate volume to allow for instrument uncertainties (total 52,100 gallons between the Technical Specifications minimum RWST level of 35.4' and the nominal containment spray shutoff point of 1.5'. Of this volume, 26,100 gallons are eventually added to the Containment, but the remaining 26,000 gallons are considered by the analysis to be unusable.
- 4) The total RWST volume, when added with accumulator discharge to the reactor coolant system, will assure no return to criticality with the reactor at cold shutdown and no control rods inserted into the core.

The water in the tank is borated to a concentration which assures reactor shutdown by at least 5% $\Delta k/k$ when all RCC assemblies are inserted and when the reactor is cooled down for refueling. The maximum boric acid concentration is approximately 1.5 weight percent boric acid. At 32°F the solubility limit of boric acid is 2.2%. Therefore, the concentration of boric acid in the refueling water storage tank is well below the solubility limit at 32°F.

The contents of the Refueling Water Storage Tank are kept above 32°F by a steam heated, austenitic stainless steel pipe coil in the bottom of the tank. Steam is supplied to this coil through a single header from the auxiliary boilers which are used to supply all required auxiliary steam to Indian Point 3.

The passive heating coil and passive single supply header are supplied with steam from any one of five sources. In the remote case of loss of steam to this tank, there would be a time period of at least 24 hours available for repair or connection to another steam source before freezing problems would arise, even under the most severe weather conditions. If the electrical heat tracing on the tank discharge line remains operable it is very probable that a freezing problem would not arise.

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The steam to the heating coil is automatically flow controlled to maintain a minimum tank water temperature of 35°F. In response to low RWST temperature, steam is admitted by temperature control valve TCV-1116, and the pressure is controlled automatically by pressure control valve PCV-1250 to maintain a nominal 7 psig steam pressure in the coil (see Plant Drawing 9321-F-27273 [Formerly Figure 9.6-16]). During normal and shutdown operations when the tank is filled with borated water, the water pressure outside the heating coil will be approximately 15 psig, thereby preventing leakage of steam out of the coil and subsequent dilution of the borated water.

All outdoor piping connected to the Refueling Water Storage Tank is electrically heat traced. The failure of any section of heat tracing is annunciated in the Control Room. The power source for the heat tracing can be manually switched between two MCC's, each powered automatically by different emergency diesel generator buses.

The design parameters are presented in Table 6.2-4.

Pumps

Class I (seismic) pumps in the Emergency Safeguards Systems, their required Net Positive Suction Head (NPSH) at extreme operating conditions, the fluid operating temperature, the NPSH available, the atmospheric pressure assumption, and the elevation of each pump are given in Table 6.2-13.

The Internal Recirculation Pumps were replaced under modification ER-04-3-066 during Refueling Outage 14. The new pumps are Flowserve model 267APKD- three (3) stage, double suction pumps. These pumps require less NPSHR over the entire flow range than the previous 24-APK3 single suction pumps. The NPSH data for the Internal Recirculation Pump is provided in Table 6.2-13. The data given for single pump operation is based on conservatively high NPSHR values from Unit 2 certified NPSH 267APKD 3 stage pump test that were used in the calculation, and which are greater than those provided by the latest curve (Figures 6.2-4A and 6.2-4B).

An analysis predicts that, for the large break LOCA, there will be 10.17 ft. of NPSH available, which credits the remainder of the RWST water delivered to the containment prior to the start of recirculation containment spray (Reference 11). In the case of a small-break LOCA, when elevated RCS pressure would preclude direct low head recirculation, high head recirculation would then be established using the Recirculation Pump(s) to deliver a suction supply to the SI Pumps. During high head recirculation, the Recirculation Pumps operate at lower flow rates and the NPSH requirements are correspondingly lower.

NPSH calculations assume saturated water in the sumps so that no credit is taken for containment pressure exceeding the vapor pressure of the sump water. While this conservative assumption is appropriate at accident initiation, it does not allow any credit for the increase of NPSHA which would result from the gradual cooling of the sump fluid to below saturated conditions.

The three (high head) safety injection pumps for supplying borated water to the Reactor Coolant System are horizontal centrifugal pumps driven by electric motors. Parts of the pump in contact with borated water are stainless steel or equivalent corrosion resistant material. A minimum flow bypass line is provided on each pump discharge to recirculate flow to the refueling water storage tank in the event the pumps are started with the normal flow paths blocked. The bypass

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line joins a common miniflow line shared by the other pumps. Each safety injection pump is sized at 50% of the capacity required to meet the design criteria outlined in Section 6.2.1. The design parameters are presented in Table 6.2-5, and Figure 6.2-2 gives the performance characteristics of these pumps.

The two residual heat removal (low head) pumps of the Auxiliary Coolant System are used to inject borated water at low pressure to the Reactor Coolant System. The two recirculation pumps are used to recirculate fluid from the recirculation sump and send it back to the reactor, the spray headers or to suction of the safety injection pumps. All four of these pumps are of the vertical centrifugal type, driven by electric motors. Parts of the pumps which contact the borated water and sodium tetraborate solution during recirculation are stainless steel or equivalent corrosion resistant material. A minimum flow bypass line is provided on the discharge of the residual heat exchangers to recirculate cooled fluid to the suction of the residual heat removal pumps should these pumps be started with their normal flow paths blocked. Additionally, each residual heat removal pump is provided with a dedicated recirculation line. These recirculation lines prevent either pump from operating at shutoff conditions and, also, during dual-pump operation preclude the stronger residual heat removal pump from dead heading the weaker pump as described in IE Bulletin 88-04. A minimum flow bypass discharging back into the recirculation sump, is provided to protect the recirculation pumps should their normal flow paths be blocked. Figure 6.2-3 and 6.2-4 give the performance characteristics of these pumps. The design parameters are presented in Table 6.2-5.

The safety injection pump bearings are cooled by booster pumps using component cooling water. The booster pumps are directly connected to the injection pump motor shaft. The pump seals were designed to operate at accident conditions without cooling water. Pump data is provided in chapter 9.3.

The recirculation pump motors are enclosed fan cooled. The fans are directly connected to the motor shafts. The motor cooling air is cooled by a heat exchanger (cooler) utilizing component cooling water and four auxiliary component cooling water pumps located outside containment. The four auxiliary component cooling water pumps are arranged in pairs, where each pair supplies an individual recirculation pump motor cooler. Either pump of a pair is capable of supplying sufficient cooling flow to its motor cooler to maintain temperatures within acceptable limits.

All four pumps are started during the injection phase; however, their function is not required during this phase. Since the recirculation pumps do not operate during injection, their motors do not experience any self-heating. Without this self-induced heat up, the motors' functional and EQ capabilities have been shown in motor qualification testing to be unaffected by the post-LOCA environment. Even with an auxiliary component cooling water pump running, effectively no motor cooling occurs during the injection phase because fans integral to the motor rotor that circulate cooling air through the heat exchanger and motor are not operating.

The component cooling water volume constitutes a large heat sink so that the main component cooling water pumps are not needed to remove any heat produced by certain components during the injection phase (with a loss of offsite power).

During the recirculation phase, auxiliary component cooling pump function is needed to ensure adequate flow to the motor coolers. A single operating main component cooling water pump is not capable of providing the required flow rate; boost from an auxiliary component cooling water pump is necessary. The pump bearings are cooled by the sump water during recirculation.

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The auxiliary component cooling pumps are part of the Component Cooling Water System and pump data on these pumps are provided in Chapter 9.

Details of the component cooling pumps and service water pumps, which serve the Safety Injection System, are presented in Chapter 9.

The pressure containing parts of the high head safety injection pumps are castings, conforming to ASTM A-296, Grade CA-15. The pressure containing parts of the Residual Heat Removal Pumps and the Recirculation Pumps are castings conforming to ASTM A-296, Grade CF-8a (chromium content 21.0 to 22.5) and ASTM A-351, Grade CF3M, respectively. Stainless steel forgings were procured per ASTM A-182, Grade F304 or F316, or ASTM A-336, Class F8 or F8M, and stainless plate was constructed to ASTM A-240, type 304 or 316. All bolting material conforms to ASTM A-193. Materials such as weld-deposited Stellite or Colmonoy were used at points of close running clearances in the pumps to prevent galling and to assure continued performance ability in high velocity areas subject to erosion.

All pressure containing parts of the pumps were chemically and physically analyzed and the results were checked to ensure conformance with the applicable ASTM specification. In addition, all pressure containing parts of the pump were liquid penetrant inspected in accordance with Appendix VIII of Section VIII of the ASME Boiler and Pressure Vessel Code.

The acceptance standard for the liquid penetrant test is ANSI B31.1, Code for Pressure Piping, Case N-10.

The pump design was reviewed with special attention to the reliability and maintenance aspects of the working components. Specific areas include evaluation of the shaft seal and bearing design to determine that adequate allowances had been made for shaft deflection and clearances between stationary parts.

Where welding of pressure containing parts was necessary, a welding procedure including joint detail was submitted for review and approval by Westinghouse. The procedure included evidence of qualification necessary for compliance with Section IX of the ASME Boiler and Pressure Vessel Code Welding Qualifications. This requirement also applied to any repair welding performed on pressure containing parts.

The pressure-containing parts of the pump were assembled and hydrostatically tested to 1.5 times the design pressure for 30 minutes.

Each pump was given a complete shop performance test in accordance with Hydraulic Institute Standards. The pumps were run at design flow and head, shut-off head and three additional points to verify performance characteristics. Where NPSH is critical, this value was established at design flow by means of adjusting suction pressure.

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Pump Cooling Water Supply	
Pump	Source of Cooling Water
1. Internal Recirculation Pumps	Auxiliary Component Cooling Water pumps are used to deliver – 40 gpm to each motor cooler.
2. High Head Safety Injection Pumps	Booster pumps connected to the shafts of the SI pumps are designed to circulate – 40 gpm of CCW per pump.
3. Residual Heat Removal Pumps	Cooling water for seals is not required when the temperature of the pumped fluid is less than 150° F. This is the case during the injection phase of a LB LOCA. During a SB LOCA, SGTR, and MSLB, RCS pressure will initially be above shutoff head of the RHR pump, and it will operate in mini-flow recirculation mode. Without cooling flow, pumped fluid temperatures will rise and may exceed 150° F prior to a procedurally controlled pump shutdown. This was evaluated to be acceptable from a pump and seal function standpoint. During the recirculation phase of a LB LOCA, or for when the cooling function of the pump is credited in the SB LOCA, SGTR, and MSLB scenarios, by design a CCW pump will be running to supply cooling water to the RHR pump and maintain seal temperature to acceptable values.
4. Containment Spray Pumps	This pump pumps fluid with a temperature never in excess of 105° F. Therefore no cooling water is required.

The only period of concern when these pumps experience a lack of cooling water is during the injection phase following a LOCA, since during the recirculation phase and at all other times, the component cooling pumps will be available. The internal recirculation pumps differ from the other sets of pumps in the table above in one respect; they are located in the containment and, therefore, they and their motors directly experience the post-accident environment. The motors specifically require dedicated cooling to fulfill their function during the recirculation phase. A single operating main component cooling water pump is not capable of supplying the required flow, and thus boost from an auxiliary component cooling pump is needed.

During the injection phase, the only heat removal requirement is for the high head safety injection pumps and for the internal recirculation pumps. The internal recirculation pumps do not require active heat removal during the injection phase. This is because the pump motors do not operate and do not self-heat in this phase. Qualification testing confirmed that the motors are capable of withstanding the post-LOCA conditions without component cooling in the injection phase.

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Safety Injection Pumps:

Component cooling water is required for cooling the bearings of these pumps. The heat load is estimated to be 75,000 Btu/hr per pump or a total of 225,000 Btu/hr for 3 pumps.

Internal Recirculation Pumps:

Cooling water is required to protect the pump motors from the containment environment during the LOCA recirculation phase. The heat load is estimated to be approximately 150,000 Btu/hr per pump or a total of 300,000 Btu/hr for two pumps. This heat load is conservatively modeled as a point source in the Component Cooling System thermal-hydraulic analyses that support WCAP-12313 (the 95°F Ultimate Heat Sink Analysis). It represents the sum of the heat produced by a maximally loaded operating motor and the heat from the containment environment present in the motor cooling enclosure that is directly transferrable to the Component Cooling System. In the injection phase, the heat load estimate would be significantly less than 300,000 Btu/hr because there would be no motor heat input. The Component Cooling Water heat rise cited in the paragraph below is therefore conservatively high and the actual times required to reach CCW temperatures of 150°F and 180°F would be greater than 6 and 10 hours, respectively.

Since the component cooling pumps do not run during the injection phase, (with loss of offsite power), the water volume of the component cooling system is used as a heat sink. This heat load causes a temperature rise of approximately 7°F/hour in the component cooling water (no credit is taken for the water volume in the surge tank). With 110° F cooling water at the start of the accident, 6 hours are available before the cooling water temperature reaches 150°F; 10 hours are available before reaching 180°F.

Heat Exchangers

The two residual heat removal heat exchangers of the Auxiliary Coolant System cool the recirculated sump water. These heat exchangers were sized for the cool-down of the Reactor System. Table 6.2-6 gives the design parameters of the heat exchangers.

The ASME Boiler and Pressure Vessel Code has strict rules regarding the wall thickness of all pressure containing parts, material quality assurance provisions, weld joint design, radiographic and liquid penetrant examination of materials and joints, and hydrostatic testing of the unit as well as requiring final inspection and stamping of the vessel by an ASME Code inspector.

The designs of the heat exchangers also conform to the requirements of TEMA (Tubular Exchanger Manufacturers Association) for Class R heat exchangers. Class R is the most rugged class of TEMA heat exchangers and is intended for units where safety and durability are required under severe service conditions. Items such as: tube spacing, flange design, nozzle location, baffle thickness and spacing, and impingement plate requirements are set forth by TEMA Standards.

In addition to the above, additional design and inspection requirements were imposed to ensure rugged, high quality heat exchangers. The design and inspection requirements included: confined-type gaskets, main flange studs with two nuts on each end to ensure permanent leak tightness, general construction and mounting brackets suitable for the plant seismic design requirements, tubes and tube sheet capable of withstanding full shell side pressure and

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temperature with atmospheric pressure on the tube side, ultrasonic inspection in accordance with Paragraph N-324.3 of Section III of the ASME Code of all tubes before bending, penetrant inspection in accordance with Paragraph N-627 of Section III of the ASME Code of all welds and hot or cold formed parts, a hydrostatic test duration of not less than thirty minutes, the witnessing of hydro and penetrant tests by a qualified inspector, a thorough final inspection of the unit for good workmanship and the absence of any gouge marks or other scars that could act as stress concentration points, and a review of the radiographs and of the certified chemical and physical test reports for all materials used in the unit.

The residual heat exchangers are conventional vertical shell and U-tube type units. The tubes are seal welded to the tube sheet. The shell connections are flanged to facilitate shell removal for inspection and cleaning of the tube bundle. Each unit has a SA-285 Grade C carbon steel shell, a SA-234 carbon steel shell end cap, SA-213 TP-304 stainless steel tubes, a SA-240 type-304 stainless steel channel, a SA-240 type 304 stainless steel channel cover, and a SA-240 type 304 stainless tube sheet.

Valves

All parts of valves used in the Safety Injection System in contact with borated water are austenitic stainless steel or equivalent corrosion resistant material. The motor operators on the injection line isolation valves are capable of rapid operation. All valves required for initiation of safety injection or isolation of the system have remote position indication in the Control Room.

Valving is specified for exceptional tightness, and where possible, instrument valves and packless diaphragm valves are used. All valves, except those which perform a control function, are provided with backseats which are capable of limiting leakage to less than 1.0 cc per hour per inch of stem diameter, assuming no credit for valve packing. Backseats can also be employed to facilitate repacking the valve stem. As a general rule, the plant relies on packing to minimize valve stem leakage. Normally closed globe valves are installed with recirculation flow under the seat to prevent leakage of recirculated water through the valve stem packing. Relief valves are totally enclosed. Control and motor-operated valves which are 2-1/2 in and larger and which are exposed to recirculation flow are provided with double-packed stuffing boxes and stem leakoff connections which are piped to the Waste Disposal System.

The check valves which isolate the Safety Injection System from the Reactor Coolant System are installed immediately adjacent to the reactor coolant piping to reduce the probability of a safety injection line rupture causing a Loss-of-Coolant Accident.

A relief valve is installed in the safety injection pump discharge header discharging to the pressurizer relief tank in order to prevent overpressure in the lines which have a lower design pressure than the Reactor Coolant System. The relief valve setpoint was increased to 1670 psig to ensure the valve does not lift when the safety injection system is operating at a pressure near the shutoff head of the safety injection pumps.

The gas relief valves on the accumulators protect them from pressures in excess of the design value.

Motor Operated Gate Valves

The pressure containing parts (body, bonnet and discs) of the valves employed in the Safety Injection System were designed per criteria established by the ANSI B16.5 (1955) or MSS SP66 specifications. The materials of construction for these parts were procured per ASTM A182, F316 or A351, GR-CF8M or CF8. All material in contact with the primary fluid, except the packing, is austenitic stainless steel or equivalent corrosion resisting material. The pressure containing cast components were radiographically inspected as outlined in ASTM E-446 Class 1 or Class 2. The body, bonnet and discs were liquid penetrant inspected in accordance with ASME Boiler and Pressure Vessel Code Section VIII, Appendix VIII. The liquid penetrant acceptable standard was as outlined in ANSI B31.1, Case N-10.

When a gasket is employed, the body-to-bonnet joint was designed per ASME Boiler and Pressure Vessel Code Section VIII or ANSI B16.5 with a fully trapped, controlled compression, spiral wound asbestos or suitable material, gasket with provisions for seal welding, or of the pressure seal design with provisions for seal welding. The body-to-bonnet bolting and nut materials were procured per ASTM A193 and A194, respectively.

The entire assembled unit was hydrotested as outlined in MSS SP-61 with the exception that the test pressure was maintained for a minimum period of 30 minutes. The seating design of the Darling parallel disc design, the Crane flexible wedge design, or the equivalent. These designs have the feature of releasing the mechanical holding force during the first increment of travel. Thus, the motor operator has to work only against the frictional component of the hydraulic unbalance on the disc and against the packing box friction. The discs are guided throughout the full disc travel to prevent shattering and provide ease of gate movement. The seating surfaces are hard faced (Stellite No. 6 or equivalent) to prevent galling and reduce wear.

The stem material is ASTM A276 type 316 condition B or precipitation hardened 17-4 pH stainless, procured and heat treated to Westinghouse specifications. These materials were selected because of their corrosion resistance, high tensile properties, and their resistance to surface scoring by the packing. The valve stuffing box was designed with a lantern ring leakoff connection with a minimum of a full set of packing below the lantern ring and a maximum of one-half of a set of packing above the lantern ring; a full set of packing is defined as a depth of packing equal to 1-1/2 times the stem diameter. The experience with this stuffing box design and the selection of packing and stem materials has been very favorable in both conventional and nuclear power plants.

Valves 744, 882, 1810, are required to be open during the injection phase of the LOCA and then are closed for long-term recirculation, in accordance with operating procedures. There is no time that these valves would be closed during plant power operation. The motors for these valves are normally de-energized with their breakers locked open. In addition, these valves are provided with red/green position indicating lights and monitor lights to highlight valves configuration as described in Section 6.2.2 "Accumulators," items 1 and 2.

Valves 856B and 856G are required to be closed during the injection and cold leg recirculation phases. The motors for these valves are normally de-energized with their breakers locked open and normal indicating lights de-energized. In addition, these valves are interlocked with corresponding cold leg injection line valves on each header to prevent simultaneous opening of all high-head safety lines on each header. The valves are equipped with a position monitor light, via limit switch and separate DC circuit, and an alarm via limit switch.

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The motor operator is extremely rugged and is noted throughout the power industry for its reliability. The unit incorporates a “hammer blow” feature that allows the motor to move the valve off its main seat or backseat while allowing the motor to attain its operational speed.

The valve was assembled, hydrostatically tested, seat-leakage tested (fore and back), operationally tested, cleaned, and packaged per specifications. All manufacturing procedures employed by the valve supplier, such as hard facing, welding, repair welding and testing, were submitted to Westinghouse for approval.

For those valves which function on the safety injection signal, 10 seconds operation or other justified times are typically required. The BIT isolation valves are maintained open, but still receive a safety injection signal to open based on their former application as normally closed valves. An opening stroke time of 11 seconds had been justified for these valves when they were maintained normally closed. However, changing their position from normally closed to normally open has superseded the requirement for a 10 or 11 second opening stroke time. For all other valves in the system, the valve operator completes its cycle from one position to the other typically in 120 seconds.

Valves which must function against system pressure were typically designed such that they function with a pressure drop equal to full system pressure across the valve disc.

Manual Valves

The stainless steel manual globe, gate and check valves were designed and built in accordance with the requirements outlined in the motor operated valve description above.

The carbon steel valves were built to conform with ANSI B16.5. The materials of construction of the body, bonnet and disc conform to the requirements of ASTM A105 Grade II, A181 Grad II, or A216 Grade WCB or WCC. The carbon steel valves pass only non-radioactive fluids and were subjected to hydrostatic test as outlined in MSS SP-61 except that the test pressure was maintained for at least 30 minutes. Since the fluid controlled by the carbon steel valves is not radioactive, the double packing and seal weld provisions are not provided.

Accumulator Check Valves

The pressure containing parts of this valve assembly were designed in accordance with MSS SP-66. All parts in contact with the operating fluid are of austenitic stainless steel or of equivalent corrosion resistant materials procured to applicable ASTM or WNES specifications. The cast pressure-containing parts were radiographed in accordance with ASTM E-94 and with the acceptance standard as outlined in ASTM E-446 Class 1 or Class 2. The cast pressure-containing parts, machined surfaces, finished hard facings, and gasket bearing surfaces were liquid penetrant inspected per ASME B&PV Code, Section VIII and the acceptance standard as outlined in ANSI B31.1 Code Case N-10. The final valve was hydrotested per MSS SP-66 except that the test pressure was maintained for at least 30 minutes. The seat leakage was conducted in accordance with the manner prescribed in MSS SP-61.

The valve was designed with a low pressure drop configuration with all operating parts contained within the body, which eliminates those problems associated with packing glands exposed to boric acid. The clapper arm shaft was manufactured from 17-4 pH stainless steel, heat treated to Westinghouse Specifications. The clapper arm shaft bushings were

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manufactured from Stellite No. 6 material. The various working parts were selected for their corrosion resistant, tensile, and bearing properties.

The disc and seat rings were manufactured from a forging. The mating surfaces are hard faced with Stellite No. 6 to improve the valve seating life. The disc is permitted to rotate, providing a new seating surface after each valve opening.

The valves are operated in the closed position with a normal differential pressure across the disc of approximately 1700 psi. The valves remain in this position except for testing and safety injection. Since the valve will not be required to normally operate in the open condition, which would subject the valve to impact loads caused by sudden flow reversal, this equipment does not have difficulties performing its required functions.

When the valve is required to function a differential pressure of less than 25 psig will shear any particles that may attempt to prevent the valve from functioning. Although the working parts are exposed to the boric acid solution contained within the reactor coolant loop, a boric acid "freeze up" is not expected with this low a concentration.

The experience derived from the check valves employed in the Emergency Injection System of the Carolina-Virginia Tube Reactor in a similar system indicated that the system is reliable and workable. The CVTR Emergency Injection System, maintained at atmospheric conditions, was separated from the main coolant piping by one six inch check valve. Check valve leakage was not a problem. This was further substantiated by the satisfactory experience obtained from operation.

Relief Valves

The accumulator relief valves were sized to pass nitrogen gas at a rate in excess of the accumulator gas fill line delivery rate. The relief valves can also pass water in excess of the expected leak rate, but this is not necessary because the time required to fill the gas space gives the operator ample opportunity to correct the situation. For an inleakage rate 15 times the manufacturing test rate, there will be about 1000 days before water will reach the relief valves. Prior to this, level and pressure alarms would have been actuated.

The safety injection test line relief valve is provided to relieve any overpressure that might build up in the high head safety injection piping due to reactor coolant system leakage past the safety injection header check valves. The valve can pass a nominal 15 gpm (2.25×10^5 cc/hr), which is far in excess of the manufacturing design leak rate of 24 cc/hr.

Leakage Limitations of Valves

Valving was specified for exceptional tightness and, where possible, instrument valves, packless diaphragm valves were used.

Normally open valves have backseats which are capable of limiting leakage to less than one cubic centimeter per hour per inch of stem diameter assuming no credit for packing in the valve. Backseats can also be employed to facilitate repacking the valve stem. As a general rule, the plant relies on packing to minimize valve stem leakage. Normally closed globe valves were installed with recirculation flow under the seat to prevent stem leakage from the more radioactive fluid side of the seat.

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Motor operated valves which are exposed to recirculation flow were provided with double-packed stuffing boxes and stem leakoff connections which are piped to the Waste Disposal System.

The specified leakage across the valve disc required to meet the equipment specification and hydrotest requirements is as follows:

Conventional globe – 3 cc/hr/in of nominal pipe size

Gate valves – 3 cc/hr/in of nominal pipe size; 10/cc/hr/in for 300 and 150 pound USA Standard

Motor operated gate valves – 3 cc/hr/in of nominal pipe size: 10/cc/hr/in for 300 and 150 pound USA Standard

Check valves – 3 cc/hr/in of nominal pipe size: 10/cc/hr/in for 300 and 150 pound USA Standard

Accumulator check valves – 10 cc/hr/in of nominal pipe size; relief valves are totally enclosed.

Piping

All Safety Injection System piping in contact with borated water is austenitic stainless steel. Piping joints are welded except for the flanged connections at the safety injection pumps and recirculation pumps.

The piping beyond the accumulator stop valves was designed for Reactor Coolant System conditions (2485 psig, 650°F). All other piping connected to the accumulator tanks was designed for 700 psig and 400°F.

The safety injection pump and residual heat removal pumps suction piping (210 psig at 300°F) from the refueling water storage meets NPSH requirements of the pumps.

The safety injection high pressure branch lines (1500 psig at 300°F) were designed for high pressure losses to limit the flow rate out of the branch line which may have ruptured at the connection to the reactor coolant loop.

The system design incorporated the ability to isolate the safety injection pumps on separate headers such that full flow from at least one pump is ensured should a branch line break. Two SI pump discharge headers are provided in a configuration which allows 2 of 3 SI Pumps to deliver into either header. The suction flow paths are configured to allow isolation of the 32 SI Pump suction piping from the common suction flow path, with an alternate suction piping alignment dedicated to the 32 SI Pump. The common and alternate suction flow paths are cross-tied via a 0.75" pressure equalization pipe, with two normally closed valves and a normally closed vent valve.

The piping was designed to meet the minimum requirements set forth in (1) the ANSI B31.1 Code (1955) for the Pressure Piping, (2) Nuclear Code Case N-7, (3) ANSI Standards B36.10 and B36.19 and (4) ASTM Standards with supplementary standards plus additional quality control measures.

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Minimum wall thickness were determined by the ANSI Code (1955) formula found in the power piping Section 1 of the ANSI Code (1955) for Pressure Piping. This minimum thickness was increased to account for the manufacturer's permissible tolerance of minus 12-1/2 percent on the nominal wall. Purchased pipe and fittings had a specified nominal wall thickness that is no less than the sum of that required for pressure containment, mechanical strength and manufacturing tolerance.

Thermal and seismic piping stress analyses were performed in accordance with ANSI B31.1 code (1967). Special attention was directed to the piping configuration at the pumps with the objective of minimizing pipe imposed loads at the suction and discharge nozzles. Piping is supported to accommodate expansion due to temperature changes during the accident.

Pipe and fittings materials were procured in conformance with all requirements of the ASTM and ANSI specifications. All materials were verified for conformance to specification and documented by certification of compliance to ASTM material requirements. Specifications imposed additional quality control upon the suppliers of pipes and fittings as listed below:

- 1) Purchased pipe and fittings required the submittal of actual heat chemical and physical test results. Each item or part of a fabrication required identification to an individual test report. Welding materials required the submittal of heat or manufacturers' lot reports showing heat chemical and physical test results.
- 2) Pipe branch lines 2-1/2 inch and larger between the reactor coolant pipes and the isolation stop valves conform to ASTM A376 and meet the supplementary requirement S6 ultrasonic testing. Fittings conform to the requirements of ASTM A403. Fittings 2-1/2 inch and larger had requirements for UT inspection similar to S6 of A376.

Shop fabrication of piping subassemblies was performed by reputable suppliers in accordance with specifications which defined and governed material procurement, detailed design, shop fabrication, cleaning, inspection, identification, packaging and shipment.

Welds for pipes sized 2-1/2 inch and larger were butt welded. Reducing tees were used where the branch size exceeds 1/2 of the header size. Branch connections of sizes that are equal to or less than 1/2 of the header size were of a design that conforms to the ANSI rules for reinforcement set forth in the ANSI B31.1 Code for Pressure Piping. Bosses for branch connections are attached to the header by means of full penetration welds.

All welding was performed by welders and welding procedures qualified in accordance with the ASME Boiler and Pressure Vessel Code Section IX, Welding Qualifications. The Shop Fabricator was required to submit all welding procedures and evidence of qualifications for review and approval prior to release for fabrication. All welding materials used by the Shop Fabricator required prior approval.

All high pressure piping butt welds containing radioactive fluid at greater than 600°F temperature and 600 psig pressure of equivalent were radiographed. The remaining piping butt welds were randomly radiographed. The technique and acceptance standards were those outlined in UW-51 of the ASME B&PV Code Section VIII. In addition, butt welds were liquid penetrant examined in accordance with the procedure of ASME B&PV Code, Section VIII, Appendix VIII and the acceptance standard as defined in the ANSI Nuclear Code Case N-10.

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Finished branch welds were liquid penetrant examined on the outside and where size permitted, on the inside root surfaces.

A post-bending solution anneal heat treatment was performed on hot-formed stainless steel pipe bends. Completed bends were then completely cleaned of oxidation from all affected surfaces. The Shop Fabricator was required to submit the bending, heat treatment and cleanup procedures for review and approval prior to release for fabrication.

General cleaning of completed piping subassemblies (inside and outside surfaces) was governed by basic ground rules set forth in the specifications. For example, these specifications prohibited the use of hydrochloric acid and limited the chloride content of service water and demineralized water.

Packaging of the piping subassemblies for shipment was done so as to preclude damage during transit and storage. Openings were closed and sealed with tight-fitting covers to prevent entry of moisture and foreign material. Flange facings and weld end preparations were protected from damage by means of wooden cover plates and securely fastened in position. The packing arrangement proposed by the Shop Fabricator was subject to approval.

Field Run Piping

Field running of small diameter piping for essential system including all Engineered Safety Features was not permitted. All seismic Class I and II piping $\frac{3}{4}$ inch diameter and larger was designed by the architect-engineer. All supports and restraints for that piping were located by the architect-engineer and designed by either the architect-engineer or the subcontractor supplying the pipe support hardware. All seismic Class I stainless steel piping sub-assemblies were prefabricated offsite at one or more subcontractors' pipe fabrication shops. All seismic Class I carbon steel piping subassemblies 2-1/2 inches in diameter and smaller were fabricated in the field.

Certain seismic Class I and II systems comprised of small diameter tubing were field run, for example, the N.S.S.S. Sampling System, which is Class II and utilizes 3/8 diameter tubing.

In instrumentation design, virtually all tubing was field run including tubing for engineered safety related devices. However, the following detailed information was supplied by the architect-engineer where critical design requirements were to be met:

- 1) Physical location of tubing where separation is required for redundant measurements
- 2) Detailed design of tubing where thermal expansion of vessels to which tubing is attached requires special expansion loops, etc.
- 3) Detailed design of typical instrument tubing supports and anchors
- 4) Detailed design of missile protection of small diameter tubing
- 5) Detailed design of tubing where proper operation of the instrument is dependent upon adequate slope of lines, etc.

It was found practical to eliminate field running of all seismic Class I and II piping $\frac{3}{4}$ inch in diameter and larger. However, it was not found practical to limit the use of field running to a greater extent, namely all small diameter seismic Class I and II tubing. Most tubing was erected near the end of the construction phase. At that time, the tubing erection forces had access to more potential support points than were known to the Architect-Engineer. Also, at that time, the construction forces necessarily erected the tubing around objects which would otherwise have been unknown interference during the design phase.

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Fabrication of all Class I and II piping, 3/4" diameter and larger, was done by piping subcontractors following orthographic piping drawings prepared by the Architect-Engineer. These same piping drawings were also used by the A-E to prepare isometric piping drawings which were then used for both the stress analysis by the designer and for installation by the field groups. These isometrics also showed locations of pipe supports and restraints. Any deviation from the drawing required approval by the Architect-Engineer. A copy of the final as-built information was directed to the Architect-Engineer for final design review.

Site Quality Control Procedures were followed embracing: purchasing and receiving inspection to assure that all weld filler materials, field run pipe and fittings met Class I and II quality requirement; joint by joint inspection to assure cleanliness; proper weld fit-up; proper welding and welder certification; and performance of required NDT. All these procedures were in accordance with A-E specifications for installation, ASA B31.1, and Section IX of the ASME Code. Detailed Quality Control records were maintained on a piece by piece basis and were also recorded on approved spool and line isometric drawings to assure that complete Quality Control coverage was obtained.

Hydrostatic tests plus hot and/or cold functional tests were performed on completed systems as required and at the appropriate time. No other special quality assurance measures were necessary.

Pump and Valve Motors

Motors Outside the Containment

Motor electrical insulation systems were supplied in accordance with ANSI, IEEE and NEMA standards and tested as required by such standards.

Temperature rise design selection was such that normal long life is achieved even under accident loading conditions.

Criteria for motors of the Safety Injection System required that under any anticipated mode of operation, the motor name plate 1.15 service factor rating is not to be exceeded. Design and test criteria ensure that motor loading does not exceed the application criteria.

Motors Inside the Containment

The SI Recirculation pumps are three stage, vertical pumps driven by 3 phase, 60 cycle, 350 HP motors, and are powered from 480V bus 5A (31) and 480V bus 6A (32). The recirculation pump motors were designed to operate in an ambient condition of saturated steam at 271°F and 47 psig pressure for one day, followed by operation for at least one year at 155°F and 5 psig in a steam atmosphere. The motors are mounted directly to their respective pumps, approximately 2 ft above the highest anticipated water level.

The SI Recirculation Pump motors are provided with thermalastic epoxy insulation and with a heat exchanger that transfers motor and ambient heat to the Component Cooling Water System. The motors have Class F insulation, temperature rating of 155°C. However, the motor insulation was derated to Class B (130°C) level to provide a safety margin. The operating temperature of the motor insulation is dependent on cooling water temperature rather than the ambient temperature.

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The recirculation pump motors are cooled by radiator type coolers using CCW as the cooling medium. Fans are directly connected to the recirculation pump motor shafts. Rotation of the motor rotor and its end fans forces air through the heat exchanger, and air is contained and returned to the ends of the rotor via ducts. When the motor is not operating, effectively no heat transfer occurs from the air to the component cooling water at the motor cooler. A pressure equalizing device permits incident pressure to enter the motor air system so that the bearings are not subject to differential pressures.

The motors are equipped with high temperature grease lubricated ball bearings which would not break down if the bearings were subjected to incident ambient temperatures.

The motors for the valves inside Containment were designed to withstand containment environment conditions following the Loss-of-Coolant Accident so that the valves can perform the required function during the recovery period.

Periodic operation of the motors and tests of the insulation ensure that the motors remain in a reliable operating condition.

Although the motors which are provided only to drive Engineered Safety Features equipment are normally run only for test, the design loading and temperature rise limits are based on accident conditions. Normal design margins were specified for these motors to make sure the expected lifetime included allowance for the occurrence of accident conditions.

Valve Motor Operators

A production line valve motor has been irradiated to a level of 2×10^8 rads using a cobalt-60 irradiation source. The irradiated motor and an identical unirradiated motor have undergone series of reversing tests at room temperature, followed by a series of reversing tests at 275F. The room temperature test was repeated while vibrating the motors at a frequency of 30 cycles per second. Both motors operated satisfactorily during all of the tests. No significant difference was evident in the comparison of the data for the two units throughout the test period.

Two independent valve operator manufacturers conducted loss of coolant environmental tests on units similar to those used in this plant. Reports of results indicated that all units operated satisfactorily at test conditions more severe than those expected in the loss-of-coolant or steam-break environment for this plant.

In addition, Westinghouse performed environmental tests on a unit similar to that being used in this plant. The results of the Westinghouse tests indicated that the equipment would perform its required function in the post-LOCA environment.

Electrical Supply

Details of the normal and emergency power sources for the Safety Injection System are presented in Chapter 8.

Protection Against Dynamic Effects

The injection lines penetrate the Containment adjacent to the Primary Auxiliary Building.

For most of the routing, these lines are outside the crane wall, hence, are protected from missiles originating within these areas. Each line penetrates the crane wall near the injection point to the reactor coolant pipe. In this manner, maximum separation, hence, protection is provided in the coolant loop area.

In the event of a Loss-of-Coolant Accident, all piping systems required to function are designed to remain within acceptable stress limits. The stresses due to dead weight, pressure, operational or design basis earthquake, and maximum motions of the Reactor Coolant Loop imposed on the attached Safety Injection Piping were evaluated in accordance with the stress limits in Section 16.1. The inclusion of the stresses in the injection lines required to function due to movements of the Reactor Coolant Loop assures that these lines maintain their integrity during a Loss-of-Coolant Accident.

All piping supports were designed for the loads imposed by the supported system. The rated loads of allowable stress limits for standard manufactured support components are in accordance with requirements of MSS-SP-58-1967. For non-standard supports designed by analysis, the requirements of AISC-1969 were followed. Where support integrity is dependent on reinforced concrete anchorage, the design was in accordance with the Requirements of ACI-318-63.

These standards provide minimum requirements on materials, design and fabrication with ample safety margins for both dead and dynamic loads over the life of the equipment. Specifically, these standards required that:

- 1) All materials used be in accordance with ASTM specifications which establish quality levels for the manufacturing process, minimum strength properties, and for test requirements which ensure compliance with the specifications
- 2) There be proper qualification of welding processes and welders for each class of material welded and for types and positions of welds
- 3) Maximum allowable stress values be established which provide an ample safety margin on both yield strength and ultimate strength.

6.2.3 Design Evaluation

Range of Core Protection

The measure of effectiveness of the Safety Injection System is the ability of the pumps and accumulators to keep the core flooded or to reflood the core rapidly where the core has been uncovered for postulated large area ruptures. The result of this performance is to sufficiently limit any increase in clad temperature below a value where emergency core cooling objectives are met. (See Section 6.2.1)

With minimum onsite emergency power available (two-of-three diesel generators), the emergency core cooling equipment consists of two out of three safety injection pumps, one or two out of two residual heat pumps, and three out of four accumulators for a cold leg break and

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four accumulators for a hot leg break. With these systems, the calculated maximum fuel cladding temperature is limited to a temperature less than that which meets the emergency core cooling design objectives for all break sizes up to and including the double-ended severance of the reactor coolant pipe. (See Section 14.3)

For large area ruptures analyzed (see Section 14.3) the clad temperatures are turned around by the accumulator injection. The active pumping components serve only to complete the refill started by the accumulators. Either two safety injection pumps or one residual heat removal pump provides sufficient addition of water to continue the reduction of clad temperature initially caused by the accumulator.

System Response

To provide protection for large area ruptures in the Reactor Coolant System, the Safety Injection System must respond to rapidly reflood the core following the depressurization and core voiding that is characteristic of large area ruptures. The accumulators act to perform the rapid reflooding function with no dependence on the normal or emergency power sources, and also with no dependence on the receipt of an actuation signal.

Operation of this system with three of the four available accumulators delivering their contents to the reactor vessel (one accumulator spilling through the break) prevents fuel clad melting and limits metal-water reaction to an insignificant amount (less than 1%).

The function of the safety injection or residual heat removal pumps is to complete the refill of the vessel and ultimately return the core to a sub-cooled state. The flow from either two safety injection pumps or one residual heat removal pump is sufficient to complete the refill with no loss of level in the core.

The design features applied to the Residual Heat Removal System (RHRS) Valves 730 and 731, that isolate it from the Reactor Coolant System provide a diverse combination of control interlock and mechanical limitations preventing improper opening of these valves and also pressure relief capacity capable of limiting pressure if the valves are not closed upon startup of the plant. These features are:

- 1) That the valves that are separately interlocked with independent pressure control signals to prevent their being opened whenever the Reactor Coolant System pressure is greater than a designated setpoint (which is below the RHRS design pressure).

The pressure interlock was not specifically designed to meet the requirements of IEEE Standard 279-1971. However, each valve, its associated pressure channel and related circuitry are powered from separate instrument buses, and wiring separation is provided to preclude any single failure from rendering both of the valves' control circuits inoperable. Each of the pressure channels is provided with separate Control Room indication to show channel operability.

A separate pressure interlock is provided for each of the two Valves Nos. 730 and 731. Each pressure interlock prevents its valve from being opened when the Reactor Coolant System pressure is greater than a designated open permissive setpoint and also automatically closes the valve whenever the Reactor Coolant

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System pressure is above a designated auto-close setpoint. These setpoints are below the design pressure of the RHRS.

While the automatic closure interlock for MOV-730 and -731 will prevent over-pressurizing the RHR system piping during an RCS pressure increase transient, this interlock will isolate the suction source of the operating RHR pump(s), potentially causing pump failure. In order to prevent inadvertent isolation of the RHR pump suction, this auto-closure interlock may be defeated by de-energizing the motor operators to MOV-730 and -731. Prior to de-energizing these MOV's Reactor Coolant System T_{ave} must be below 200°F, depressurized and vented through a minimum equivalent opening of two (2) square inches.

- 2) That the Reactor Coolant System pressure interlocks meet single failure criteria.
- 3) That the motors are qualified in accordance with IEEE 323-1974, IEEE 344-1975, IEEE 382-1972 for increased reliability and operability in the normal and accident containment environment.

The Residual Heat Removal System was designed for a pressure of 600 psig and 400°F and was hydrostatically tested at a pressure of 900 psig prior to initial operation. Insofar as the piping itself is concerned, the piping code (USAS B31.1) allows a rating of 700 psig at 400°F for schedule 40 stainless steel pipe. Thus the piping system, as presently designed, incorporates a considerable margin in that it is rated at a pressure-temperature condition which is less than that allowed by Code. It is also noted that the Code allows an overpressure allowance above the design pressure under transient conditions.

- 4) That the RHRS is equipped with a pressure relief valve RV-1836 sized with a relief capacity of 400 gpm. This is a diverse backup to administrative closure of the isolation valves prior to startup to prevent overpressurization when returning the plant to operation. In addition, Technical Specification Section 3.4.12 restricts operation of the SI pumps when the RCS average cold leg temperature is below the OPS enable temperature. These restrictions help to preclude RHR overpressurization.
- 5) To preclude spurious closure of the valves, the control circuitry is of the energize-to-actuate principle.
- 6) That each of the pressure channels has a separate Control Room indication to show channel operability.
- 7) Open/close position indication lights are provided for these valves as well as a visual and audible alarm to indicate when either valve leaves its full open position.

Initial response of the injection systems is automatic with appropriate allowances for delays in actuation of circuitry and active components. The active portions of the injection systems are automatically actuated by the safety injection signal (Chapter 7). In addition, manual actuation of the entire injection system and individual components can be accomplished from the Control Room. In analysis of system performance, delays in reaching the programmed trip points and in actuation of components are conservatively established on the basis that only emergency onsite power is available.

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The starting sequence of the safety injection and residual heat removal pumps and the related emergency power equipment is designed so that delivery of the full rated flow is reached within 27 seconds after the process parameters reach the set points for the injection signal.

<u>EVENT</u>	<u>SECONDS</u>
Time to initiate the safety injection signal	2
Time for diesel generators to come up to speed	10
Time for safety injection pumps to come up to speed	10
Time for Residual Heat Removal Pumps to come up to speed	5
Total	27

Motor control centers are energized and injection valves are opened during this time to allow pumped ECCS delivery.

This delay is consistent with the 25 second delay which is assumed in the analysis of the Loss-of-Coolant Accident as described in Chapter 14. The modeling of a 25 second SI delay time is conservative for this action sequence since no credit is taken for Charging or SI flow prior to 25 seconds (although these pumps are actually up to speed), and credit is not taken for partial RHR flow up to 25 seconds. On this basis, the integral injection flow for the assumed 25 second delay time remains less than the actual injection flow that would be delivered if partial credit for pumps on prior to 25 seconds was assumed.

To reduce inadvertent Safety Injection System Actuations due to instrumentation lags in the engineered safeguards system high steamline flow, low average temperature Tavg/Low steamline pressure coincidence circuitry, a time delay will be installed in each train (a maximum time delay of 6 seconds will meet the acceptance criteria for a steamline rupture).

Single Failure Analysis

A single active failure analysis is presented in Table 6.2-7. All credible active system failures were considered. The analysis of the Loss-of-Coolant Accident presented in Chapter 14 is consistent with the single failure analysis.

It is based on the worst single failure (generally a pump failure) in both the safety injection and residual heat removal pumping systems. The analysis shows that the failure of any single active component will not prevent fulfilling the design function.

In addition to active failures, an alternative flow path is available to maintain core cooling if any part of the recirculation flow path becomes unavailable due to a single passive failure. This evaluated in Table 6.2-8.

The procedure followed to establish the alternate flow path also isolates the spilling line. A valve is provided in the containment recirculation line to the residual heat removal pumps in order to isolate this line should it be required.

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Therefore, the ECCS design incorporates redundancy of components such that neither a single active component failure during the injection phase nor an active or passive failure during the recirculation phase will degrade the ECCS function. Only active failures are assumed to occur within the first 24 hours following the initiating event.

Failure analyses of the Component Cooling and Service Water Systems under Loss-of-Coolant Accident conditions are described in Sections 9.3 and 9.6, respectively.

Reliance on Interconnected Systems

During the injection phase, the high head safety injection pumps do not depend on any portion of other systems with the exception of the suction line from the refueling water storage tank. During the recirculation phase of the accident for small breaks, suction to the high head safety injection pumps is provided by the recirculation pumps or, should backup capability be required, the residual heat removal pumps.

The residual heat removal (low head) pumps are normally used during the reactor shutdown operations. Whenever the reactor is at power, the pumps are aligned for emergency duty.

Shared Function Evaluation

Table 6.2-9 is an evaluation of the main components, which have been previously discussed, and a brief description of how each component functions during normal operation and during the accident.

Passive Systems

The accumulators are a passive safety feature in that they perform their design function in the total absence of an actuation signal or power source. The only moving parts in the accumulator injection train are in the two check valves.

The working parts of the check valves are exposed to fluid of relatively low boric acid concentration. Even if some unforeseen deposition accumulated, a reversed differential pressure of about 25 psi can shear any particles in the bearing that may tend to prevent valve functioning. This is demonstrated by calculation.

The isolation valve at each accumulator is only closed when the reactor is intentionally depressurized, or momentarily for testing when pressurized. The isolation valve is normally opened and an alarm in the Control Room sounds if the valve is inadvertently closed. It is not expected that the isolation valve will have to be closed due to excessive leakage through the check valves.

The check valves operate in the closed position with a nominal differential pressure across the disc of approximately 1650 psi. They remain in this position except for testing or when called upon to function. Since the valves operate normally in the closed position and are, therefore, not subject to the abuse of flowing operation or impact loads caused by sudden flow reversal and seating, they do not experience any wear of the moving parts, and therefore, function as required.

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When the Reactor Coolant System is being pressurized during the normal plant heat-up operation, the check valves are tested for leakage as soon as there is about 100 psi differential across the valve. This test confirms the seating of the disc and whether or not there has been an increase in leakage since the last test. When this test is completed, the discharge line test valves are opened and the Reactor Coolant System pressure increase is continued. There should be no increase in leakage from this point on since increasing reactor coolant pressure increases the seating force and decreases the probability of leakage.

The accumulators can accept leakage from the Reactor Coolant System without effect on their availability. Table 6.2-10 indicates what in-leakage rates over a given time period require readjusting the level at the end of the time period. In addition, these rates are compared to the maximum allowed leak rates for manufacturing acceptance test (100 cc/hr, i.e., 10 cc/hr/in).

In-leakage at a rate of 10 cc/hr/inch would require that the accumulator water volume be adjusted approximately once every 8 months. This would indicate that level adjustments can be scheduled and that this work can be done at the operator's convenience. At a leak rate of 80 cc/hr/inch (8 times the acceptance leak rate), the water level will have to be readjusted approximately once a month. This readjustment will take about 2 hours maximum.

The accumulators are located inside the reactor containment and protected from the Reactor Coolant System piping and components by a missile barrier. Accidental release of the gas charge in the accumulators would cause an increase in the containment pressure of approximately 0.1 psi. This release of gas has been included in the containment pressure analysis for the Loss-of-Coolant Accident, Chapter 14.

During normal operation, the flow rate through the reactor coolant piping is approximately five times the maximum flow rate from the accumulator during injection. Therefore, fluid impingement on reactor vessel components during operation of the accumulator is not restricting

Emergency Flow to the Core

Special attention is given to factors that could adversely affect the accumulator and safety injection flow to the core. These factors are:

- Steam binding in the core, including flow blockage due to loop sealing
- Loss of accumulator water during blowdown
- Short circuiting of the accumulator from the core to another part of the Reactor Coolant System
- Loss of accumulator water through the breaks.

All of the above are considered in the analysis and are discussed quantitatively in Chapter 14.

External Recirculation Loop Leakage

The Authority has established a program to identify and reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident.

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The following systems are included in the subject program for leak identification and reduction:

Chemical and Volume Control System

- a) Volume Control Tank up to the outlet isolation valve including gas space
- b) RCP seal return line from the containment penetration to the VCT

Residual Heat Removal System

- Suction to pumps from Loop 32
- Discharge of pumps to containment

Safety Injection System

- a) Recirculation path from containment sump thru RHR pumps to RHR heat exchanger and to safety injection pump suction
- b) Recirculation path from recirculation pump discharge to safety injection pump suction
- c) Safety injection pump discharge path to containment
- d) Boron injection tank
- e) Alternate recirculation path from the containment sump thru the RHR pump to the suction of 32 SI pump (bypassing the RHR heat exchanger).

Primary Sampling System

- a) Reactor Coolant Hot Leg Sample
- b) Recirculation Pumps Sample
- c) RHR Loop Sample
- d) Volume Control Tank Sample up to the outlet isolation valve

Post-Accident Containment Air Sampling System

- Sample from Containment and return to Containment.

- 6) Containment Hydrogen Monitoring System
From Containment and to Containment

Leakage detection exterior to the Containment is achieved through use of sump tank and waste holdup tank level detection. The Primary Auxiliary Building sump pumps start automatically in the event that liquid accumulates in the sump. Valving is provided to permit the operator to individually isolate the residual heat removal pumps.

Pump NPSH Requirements

Residual Heat Removal Pumps

The NPSH of the residual heat removal pumps is evaluated for normal plant shutdown operation, and both the injection and recirculation phase operation of the design basis accident.

The residual heat removal pumps are used as backup to the internal recirculation pumps in the event of failures to the normal recirculation path; this duty provides the pumps with the minimum NPSH condition. The flow produced by one (1) RHR Pump, operating in conjunction with one (1) RHR heat Exchanger, is presently throttled to 5000 gpm to avoid flow-induced vibrations of the heat exchanger tube bundle.

Safety Injection Pumps

The NPSH for the safety injection pumps is evaluated for both the injection and recirculation phase operation of the design basis accident. The end of injection phase operation gives the limiting NPSH requirement, and the NPSH available is determined from the elevation head and vapor pressure of the water in the refueling water storage tank and the pressure drop in the suction piping from the tank to the pumps. At the end of the injection phase, 40 percent NPSH margin is available assuming all three safety injection pumps running at run-out condition together with two RHR pumps at design flow.

Recirculation Pumps

The NPSH for the Recirculation Pumps is evaluated for the recirculation phase of operation for the design basis accident. The NPSH available is determined from the elevation head of the water above the vendor-provided reference point for the entrance of the first stage impeller of the pumps, level drawdown due to the flow path in the containment, fluid temperature adjustments, and strainer head losses. The NPSH determination met the requirements of GL 2004-02.

The new Internal Recirculation Pump is a conventional vertical type pump with a double suction inlet design, which requires considerably less NPSH than the previous single suction pump design it replaces.

In the NPSH evaluation, water is assumed to be at saturated conditions and no credit is taken for the Containment pressure after the accident. At the initiation of the recirculation phase, adequate NPSH is available for one (1) or two (2) pump operation.

6.2.4 Minimum Operating Conditions

The Technical Specifications establish limiting conditions regarding the operability of the system when in MODES 1, 2, 3, and 4.

6.2.5 Inspections and Tests

Inspection

All components of the Safety Injection System are inspected periodically to demonstrate system readiness.

The pressure containing components are inspected for leaks from pump seals, valve packing, flanged joints and safety valves during system testing.

In addition, to the extent practical, the critical parts of the reactor vessel internals, pipes, valves and pumps are inspected visually or by boroscopic examination for erosion, corrosion, and vibration wear evidence and for non-destructive test inspection where such techniques are desirable and appropriate.

Pre-Operational Testing

Component Testing

Pre-operational performance tests of the components were performed in the manufacturer's shop. The pressure-containing parts of the pump were hydrostatically tested in accordance with Paragraph UG-99 of Section VIII of the ASME Code. Each pump was given a complete shop performance test in accordance with Hydraulic Institute Standards. The pumps were run at design flow and head, shutoff head and at additional points to verify performance characteristics. NPSH was established at design flow by means of adjusting suction pressure for a representative pump.

The remote operated valves in the Safety Injection System are motor operated. Shop tests for each valve included a hydrostatic pressure test, leakage tests, a check of opening and closing time, and verification of torque switch and limit switch settings. The ability of the motor operator to move the valve with the design differential pressure across the gate was demonstrated by opening the valve with an appropriate hydrostatic pressure on one side of the valve.

The recirculation piping and accumulators were initially hydrostatically tested at 150 percent of design pressure.

The service water and component cooling water pumps were tested prior to initial operation.

System Testing

Initial functional tests of the core cooling portion of the Safety Injection System were conducted before initial plant startup. These tests were performed following the flushing and hydrostatic testing of the system and with the Reactor Coolant System cold. The Safety Injection System valving was set initially to simulate the system alignment for Plant Power Operation.

The functional tests were divided into two parts:

- 1) Demonstrating the proper function of instrumentation and actuation circuits, confirm valve operating times, confirm pump motor starting times, and demonstrate the proper automatic sequencing of load addition to the emergency diesels.

These tests were repeated for the various modes of operation needed to demonstrate performance at partial effectiveness, i.e., to demonstrate the proper loading sequence with two of the three emergency diesels, and to demonstrate the correct automatic starting of a second pump should the first pump fail to respond. These tests were performed without delivery of water to the Reactor Coolant System, but included the starting of all pumping equipment involved in each test.

- 2) Demonstrating the proper delivery rates of injection water to the Reactor Coolant System.

To initiate the first part of the test, the safety injection block switch was moved to the unblock position to provide control power allowing the automatic actuation of the safety injection relays from the low water level and low-pressure signals from the pressurizer instrumentation. Simultaneously, the breakers supplying outside power to the 480 volt buses were tripped manually and operation of the emergency diesel system automatically commences. The high-

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head safety injection pumps and the residual heat removal pumps were started automatically following the prescribed diesel loading sequence. The valves were operated automatically to align the flow path for injection into the Reactor Coolant System.

The second portion of the test was initiated by manually starting individual pumps on mini-flow and manually opening the appropriate isolation valve to deliver water to the Reactor Coolant System. Data was taken to verify proper pump performance and flow delivery rates.

The systems were accepted only after demonstration of proper actuation and after demonstration of flow delivery and shutoff head within design requirements.

Post-Operational Testing

Component Testing

Routine periodic testing of the Safety Injection System components and all necessary support systems at power is performed. The safety injection and residual heat removal pumps are to be tested in accordance with the Indian Point 3 Inservice Testing Program, to check the operation of the starting circuits, verify the pumps are in satisfactory running order, and verification is made that required discharge head is attained. No inflow to the Reactor Coolant System occurs whenever the reactor coolant pressure is above 1500 psi. If testing indicates a need for corrective maintenance, the redundancy of equipment in these systems permits such maintenance to be performed without shutting down or reducing load under conditions defined in the Technical Specifications. These conditions include the period within which the component should be restored to service.

The operation of the remote stop valves in the accumulator tank discharge line may be tested by opening the remote test valves just downstream of the stop valve. Flow through the test line can be observed on instruments and the opening and closing of the discharge line stop valves can be sensed on this instrumentation. Test circuits are provided to periodically examine the leakage back through the check valves and to ascertain that these valves seat whenever the Reactor Coolant System pressure is raised.

This test is routinely performed when the reactor is being returned to power after an outage and the reactor pressure is raised above the accumulator pressure. If leakage through a check valve should become excessive, the isolation valve would be closed (the safety injection actuation signal will cause this valve to open should it be in the closed position at the time of a Loss-of-Coolant Accident). The performance of the check valves has been carefully studied and it is concluded that it is highly unlikely that the accumulator lines would have to be closed because of leakage.

The recirculation pumps are normally in a dry sump. Flow testing of these pumps can be performed during refueling operations by filling the recirculation sump and opening the test line isolation valve on the discharge of the pump and directing the flow back to the sump. Those service water and component cooling pumps which are not running during normal operation may be tested by alternating with the operating pumps.

The content of the accumulators, the Boron Injection Tank and the Refueling Water Storage Tank are sampled periodically to determine that the required boron concentration is present.

System Testing

System testing can be conducted during plant shutdown to demonstrate proper automatic operation of the Safety Injection System. A test signal is applied to initiate automatic action and verification made that the components receive the safety injection signal in the proper sequence. The Safety Injection and Residual Heat Removal pumps are blocked from starting. Isolation valves in the injection lines are blocked closed so that flow is not introduced into the reactor coolant system. The system test demonstrates the operation of the valves, pump circuit breakers, and automatic circuitry. The test is considered satisfactory if control board indication and visual observations indicate all components have operated and sequenced properly. A complete system test cannot be performed when the reactor is operating because a safety injection signal would cause a reactor trip. The method of assuring complete operability of the Safety Injection System is to combine the system test performed during plant shutdown with more frequent component tests, which can be performed during reactor operation.

The accumulators and the safety injection piping up to the final isolation valve are maintained sufficiently full of borated water while the plant is in operation to ensure the system remains operable and performs properly. The accumulators and the high head injection lines are refilled with borated water as required by using the safety injection pumps to recirculate refueling water through the injection lines. A small test line is provided for the purpose in each injection header.

Flow in each of the safety injection headers and in the main flow line for the residual heat removal pumps is monitored by a local flow indicator. Pressure instrumentation is also provided for the main flow paths of the safety injection and residual heat removal pumps. Accumulator isolation valves are blocked closed for this test.

The eight-switch sequence for recirculation operation may be tested following the above injection phase test to demonstrate proper sequencing of valves and pumps. The recirculation pumps are blocked from starting during this test.

The external recirculation flow paths are hydrotested during periodic retests at the operating pressures. This is accomplished by running each pump which could be utilized during external recirculation (safety injection and residual heat removal pumps) in turn at near shutoff head conditions and checking the discharge and recirculation test lines. The suction lines are tested by running the residual heat removal pumps and opening the flow path to the safety injection pumps in the same manner as described above.

During the above test, all system joints, valve packings, pump seals, leak-off connections or other potential points of leakage are visually examined. Valve gland packing, pump seals and flanges are adjusted or replaced as required to reduce the leakage to acceptable proportions. For power operated valves, final packing adjustments are made, and the valves are put through an operating cycle before a final leakage examination is made.

The entire recirculation loop except the recirculation line to the residual heat removal pumps is pressurized during periodic testing of the Engineered-Safety Features components. The recirculation line to the residual heat removal pump is capable of being hydrotested during plant shutdown, and it is also leak tested at the time of the periodic retests of the Containment.

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In the event of any modification to the high head safety injection system piping and/or valve arrangement, a system flow test is required. System flow testing establishes and verifies that the actual performance capability of the system is within minimum calculated safety analysis flow ranges.

References

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- 2) Revised Feasibility Report for BIT Elimination for Indian Point Unit 3, dated July 1988 (Westinghouse).
- 3) Modification MOD 86-03-150 SIS, "Elimination of Boron Injection Tank, Phase I."
- 4) Nuclear Safety Evaluation No. NSE 86-03-150 SIS, "Elimination of Boron Injection Tank, Phase I."
- 5) Classification CLAS 86-03-150 SIS, "Elimination of Boron Injection Tank, Phase I."
- 6) FSAR, Section 14.2.5
- 7) Modification ER-04-3-066, "Containment SI Recirculation Pumps Replacement."
- 8) A. E. Lane, et al., Evaluation of Post Accident Chemical Effects in Containment Sump Fluids to Support GSI-191, WCAP-16530-NP-A, Westinghouse Electric Corporation LLC, March 2008.
- 9) T. S. Andreychek, et al., Evaluation of Downstream Sump Debris Effects in Support of GSI-191, WCAP-16406-P-A, Revision 1; Westinghouse Electric Corporation LLC, March 2008.
- 10) T. S. Andreychek, et al., Evaluation of Long-Term Cooling Considering Particulate, Fibrous and Chemical Debris in the Recirculating Fluid, WCAP-16793-NP, Revision 0; Westinghouse Electric Corporation LLC, May 2007
- 11) IP-CALC-09-000179, Rev. 3; Indian Point ECCS Sump Strainer Certification Calculation Based On NPSH, Minimum Flow, Structural Limit And Void Fraction Requirements.
- 12) NRC Generic Letter 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors", dated September 13, 2004.
- 13) NRC Generic Safety Issue (GSI) 191, "Assessment of Debris Accumulation on PWR Sump Performance."
- 14) NRC Generic SER dated 12/6/04 on the NEI 04-07 Guidance Report, "Pressurized Water Reactor Sump Performance Evaluation Methodology."

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TABLE 6.2-1

SAFETY INJECTION SYSTEM – CODE REQUIREMENTS

Components	Code
Refueling Water Storage Tank	AWWA D100-67
Residual Heat Removal Heat Exchanger	
Tube Side	ASME Section III Class C
Shell Side	ASME Section VIII
Accumulators	ASME Section III Class C
Boron Injection Tank	ASME Section III Class C
Valves	ANSI B16.5 (1955)
Piping	ANSI B31.1 (1967)

TABLE 6.2-2

ACCUMULATOR DESIGN PARAMETERS

Quantity	4
Type	Stainless Steel lined/carbon steel
Design Pressure, psig	700
Design Temperature, °F	300
Operating Temperature, °F	#130
Normal Operating Pressure, psig	650
Minimum Operating Pressure, psig	615
Total Volume, ft ³	1100
Minimum/Maximum Water Volume at Operating Conditions, ft ³	775/815
Minimum/Maximum Boron Concentration – Normal Operating Conditions (as boric acid), ppm	2000/2600
Relief Valve Set Point, psig*	700

*The relief valves have soft seats and are designed and tested to ensure zero leakage at the normal operating pressure.

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TABLE 6.2-3

BORON INJECTION TANK DESIGN PARAMETERS

QUANTITY	1
Total Volume, gal	900
Boron Concentration (as boric acid) nominal, ppm	21,000**
Design Pressure, psig	1750
Design Temperature, °F	300
Operating Pressure, psig	0 – 1500*
Operating Temperature, °F	150 – 180***
Material	Stainless Steel
Number of Strip Heaters	12 (permanently de-energized)
Heater Capacity, each, kW	1 (permanently de-energized)

* 1500 psig is normal maximum, but could reach 1670 psig for short periods.

** Actual boron concentration is maintained at approximately 2500 ppm.

*** Actual operating temperature is ambient.

TABLE 6.2-4

REFUELING WATER STORAGE TANK DESIGN PARAMETERS

Quantity	1
Material	Stainless Steel
Total Tank Capacity at Overflow, gal	355,200
Nominal Water Volume, gal	342,200
Normal Pressure, psig	Atmospheric
Operating Temperature, °F	Above freezing
Design Pressure, psig	Atmospheric
Design Temperature, °F	120
Minimum/Maximum Boron Concentration – Normal Operating Conditions (as boric acid), ppm	2400/2600
Type of heating	Steam

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TABLE 6.2-5

PUMP DESIGN PARAMETERS

Safety Injection Pump

Quantity	3
Design Pressure, discharge, psig	1700
Design Pressure, suction, psig	250
Design Temperature, °F	300
Design Flow Rate, gpm	400
Maximum Flow Rate, gpm	675
NPSH Required at Maximum Flow Rate, ft	35
Design Head, ft	2500
Design Shutoff Head, ft	3500
Material	Austenitic Stainless Steel
Type	Horizontal, centrifugal
Motor Horsepower	400

Recirculation Pump

Quantity	2
Type	Vertical, centrifugal
Design Pressure, discharge, psig	250
Design Temperature, °F	300
Design Flow, gpm	3000
Design Head, ft	370*
Material	Austenitic Stainless Steel
Maximum Flow Rate, gpm	4580*
Shutoff Head, ft	460*
Motor Horsepower	350

*Highest of the two pumps.

PUMP DESIGN PARAMETERS

Residual Heat Removal Pump	
Quantity	2
Type	Vertical, centrifugal
Design Pressure, discharge, psig	600
Design Temperature, °F	400
Design Flow, gpm	3000
Design Head*, ft	350
Material	Austenitic Stainless Steel
Maximum Flow Rate, gpm	4500
Design Shutoff Head*, ft	390
Motor Horsepower	400

*For analytical purposes these design values should be reduced by 18 ft. to allow for pump wear (See Figure 6.2-3).

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TABLE 6.2-6

RESIDUAL HEAT REMOVAL SYSTEM HEAT EXCHANGERS DESIGN PARAMETERS

Number	2	
Type	Vertical shell and U-tube	
Heat exchanged, Btu/hr	30.8 x 10 ⁶	
Fouled transfer rate, Btu/hr-°F-ft ²	309	
Clean transfer rate, Btu/hr-°F-ft ²	410	
Surface area, ft ²	3579	
Overall heat transfer coefficient*, Btu/hr-°F	1.1 x 10 ⁶	
Design cycles (85°F - 350°F)	200	
Design Conditions:		
<u>Parameter</u>	<u>Tube Side</u>	<u>Shell Side</u>
Pressure, psig	600	150
Temperature, °F	400	200
Flow, lb/hr	1.44 x 10 ⁶	2.46 x 10 ⁶
Inlet temperature, °F	135	95
Outlet temperature, °F	113.5	100.8
Material	Stainless Steel	Carbon Steel

*Fouled transfer rate multiplied by the design surface area.

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TABLE 6.2-7
SINGLE ACTIVE FAILURE ANALYSIS – SAFETY INJECTION SYSTEM

Component	Malfunction	Comments
A. Accumulator (injection phase)	Deliver to broken loop	Totally passive system with one accumulator per loop. Evaluation based on three accumulators delivering to the core and one spilling from ruptured loop
B. Pump: (injection and recirculation phase as marked)		
1) Safety injection	Fails to start	Three provided. Evaluation based on operation of two
2) Residual heat removal	Fails to start	Two provided. Evaluation based on operation of one plus at least two safety injection pumps
3) Component cooling*	Fails to start	A total of 1 of 3 required during recirculation
4) Conventional and nuclear service water*	Fails to start	A total of 3 of 6 required during recirculation
5) Recirculation*	Fails to start	Two provided. One required to operate during recirculation
6) Auxiliary component cooling	Fails to start	Two pairs provided. One or both of pair operate during injection. One required per pair to operate during recirculation.**
C. Automatically Operated Valves: (Repositioned on Safety Injection Signal) – (Injection phase)		
Boron Injection Tank Isolation		
Inlet (Valves 1852A & 1852B)	Fails closed	Valves are normally open in two parallel lines, one valve in either line remains open
Outlet (Valves 1835A & 1835B)	Fails closed	Valves are normally open in two parallel lines, one valve in either line remains open
2) Accumulator discharge valves (894A-D)	Fails closed	All four valves are normally open during power operation with AC power removed
3) Boron injection tank recirculation isolation valves (1851A/B)	Fails closed	Flowpath is isolated by locked closed valves 1844, 1848, 1198A and 1198B
4) Residual heat removal line isolation valve at residual heat exchanger discharge (valves 638, 640, 746, 747, 899A, 899B)	Fails to start	Cross-over line provided to assure sufficient flow for closure of any valve with two RHR pumps running

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Component	Malfunction	Comments
5) Isolation valve on component cooling water line from residual heat exchangers (valves 822A & 822B)	Fails to open	Two parallel, one valve in either line is required to open
D. Power Operated Valves : (Spurious Repositioning) (Injection Phase)		
1) Safety injection pump recirculation isolation valves (842, 843)	Fails closed	Valves are normally open during power operation with AC power removed
2) Residual heat removal recirculation isolation valves (743, 1870)	Fails closed	Valves are normally open during power operation with AC power removed
3) Refueling water storage tank suction isolation removal line isolation valves (1810, 882)	Fails closed	Valves are normally open during power operation with AC power removed
4) Residual heat removal pump discharge header isolation valve (744)	Fails closed	Valve is normally open during power operation with AC power removed
5) High-head safety injection header hot leg isolation valves (856B, 856G)	Fails open	Valves are normally closed during power operation with AC power removed
6) High-head safety injection header cold leg isolation valves (856C, 856E, 856H, 856J)	Fails closed	Valves are normally open during power operation with AC power supplied. The reduced flow capability with single valve closure is analyzed by the flow delivery of all three safety injection pumps
E. Emergency Power: (injection or recirculation phase)		
1) Emergency Diesel 31	Fails to run	Two of three safety injection pumps, one of two residual heat removal pumps and two of two recirculation pumps available to operate
2) Emergency Diesel 32	Fails to run	Two of three safety injection pumps, one of two residual heat removal pumps and one of two recirculation pumps available to operate
3) Emergency Diesel 33	Fails to run	Two of three safety injection pumps, two of two residual heat removal pumps and one of two recirculation pumps available to operate
F. Valves Operated from Control Room for Recirculation (recirculation phase)		
1) Recirculation internal recirculation isolation (valves 1802A & 1802B)	Fails to open	Two valves in parallel, one valve in either line is required to open

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2) Safety injection pump suction valve at residual heat exchanger discharge (valves 888A & 888B)	Fails to open	Two valves in parallel, one valve is required to open
3) Isolation valve on the miniflow line returning to the refueling water storage tank (valves 842 & 843)	Fails to close	Two valves in series, one required to close
4) Isolation at suction header from Refueling Water Storage Tank to safety injection pumps (valves 1810 & 847)	Fails to close	Two valves in series, one required to close (one valve is a check valve)
5) Residual heat removal pump recirculation line (valves 743 & 1870)	Fails to close	Two valves in series, one required to close
6) Residual heat removal pump discharge line (valve 744 and check valve 741)	Fails to close	Two valves in series, one required to close (one valve is a check valve). (744 operated from control room once AC restored to valve controls.)
7) Residual heat removal line isolation valves at residual heat exchanger discharge (valves 746 & 899A and 747 & 899B)	Fails to close	Two valves in series in each of two parallel lines; one valve of each pair is required to close
8) Isolation valves for high head hot leg recirculation (Valves 856B and 856G)	Fails to open	Two valves, one in each of two parallel lines, one valve is required to open
9) Safety injection pump 32 suction isolation valves (887A/B)	Fails to close	Two valves provided in series; only one valve required to isolate high-head recirculation suction flow paths

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TABLE 6.2-7
(Cont.)

SINGLE ACTIVE FAILURE ANALYSIS – SAFETY INJECTION SYSTEM

10) High-head safety injection header hot leg isolation valves (856B, 856G)	Fails open	Valves have AC power until realignment to high-head hot leg recirculation to prevent spurious mispositioning
11) High-head safety injection header cold leg isolation valves (856C, 856E, 856H, 856J)	Fails closed	Valves are normally open during cold leg recirculation. The spurious closure of one valve results in adequate flow performance with only two safety injection pumps operating.
12) High-head safety injection header cold leg isolation valves (856C, 856E, 856H, 856J)	Fails open	Valves have AC power removed following realignment to high-head hot leg recirculation to prevent spurious mispositioning
13) High-head safety injection header hot leg isolation valves (856B, 856G)	Fails closed	Valves have AC power removed following realignment to high-head hot leg recirculation to prevent spurious mispositioning
14) Limit switches on high-head safety injection header hot leg isolation valves (856B, 856G)	Fails to stop valve in throttled position while opening	Fully open valve causes pump failure in affected header. Remaining header provides adequate flow for core cooling. (Note that 856B is normally full open by design for hot leg injection.)
15) Boron Injection Tank Outlet Isolation Valves, (1835A/B)	Fails to open	If closed during low head recirculation, one valve in either parallel line is required to open during transfer to leg recirculation.

* Recirculation phase

** These pumps start on an SI Signal and operate during the injection phase. However, their function is not credited in this phase. That is because the recirculation pump motors do not operate in injection mode (no self-heating is produced), and because the motors have been qualified as acceptable for the post-accident conditions without forced cooling in this mode.

Note: The status of all active components of the Safety Injection System is indicated on the main control board. Reference is made to Table 6.2-12.

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TABLE 6.2-8
SINGLE PASSIVE FAILURE ANALYSIS
(LOSS OF RECIRCULATION FLOW PATH)***

Flow Path	Indication of Loss of Flow Path	Alternate Flow Path
<u>Low Head Recirculation</u> From recirculation sump to low head injection header via the recirculation pumps and the residual heat exchanger.	1. Insufficient flow in low head injection lines (one flow monitor in each of the four low head injection lines*)	From recirculation pump to high head injection header via the recirculation pumps, one of the two residual heat exchangers and the safety injection pump.**
	2. As 1 above.	a. From containment sump to discharge header of the residual heat exchanger via the residual heat removal pumps. b. If flow is not established in low head injection lines – as (a), except path is from discharge of one residual heat exchanger to the high head injection header via the safety injection pumps.

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Flow Path	Indication of Loss of Flow Path	Alternate Flow Path
<u>High Head Recirculation</u> From recirculation sump to high head injection header via the recirculation pumps, one of the two residual heat exchangers and the high head injection pumps.	1. No flow in high head injection header (three flow monitors, one in each injection line, and one pressure monitor). (Note: One of the four cold leg lines per header has been isolated by a locked closed valve.)	a. From containment sump to high head injection header via the residual heat removal pumps, one of the two residual heat exchangers and the high head injection pumps.
		b. If flow is not established in high head injection header – as (a) except path is from discharge of the residual heat removal pumps to the high head injection pumps via safety injection pump 32 (by-passing the residual heat exchangers*).
	2. Flow in only one of the two high head injection branch headers (three flow monitors per branch header). (Note: One of the four cold leg lines per header has been isolated by a locked closed valve.)	a. as 1 (b) except that flow from safety injection pump 32 is only supplied to the unbroken branch header.

Note: As shown on Plant Drawings 9321-F-27353 and 27503 [Formerly Figures 6.2-1A and – B], there are valves at all locations where alternative flow paths are provided.

* With the flow meters on three or more lines indicating greater than zero and with the lowest of these flows at least 360 gpm, \pm 10 gpm, or with zero flow indicated on two lines and the lowest flow meter for each of the remaining lines reading at least 360 gpm, \pm 10 gpm, the supply of recirculated water using low head recirculation will maintain the core flooded even in the event of a low head line spilling and one failed flow meter or other single failure.

** Manual Start

*** Loss of the recirculation flow path due to a passive failure is not postulated until 24 hours into the accident (reference Technical Specification Amendment #238).

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TABLE 6.2-9

SHARED FUNCTIONS EVALUATION

Component	Normal Operating Function	Normal Operating Arrangement	Accident Function	Accident Arrangement
Boron Injection Tank (BIT)	None	Lined up to discharge of safety injection pumps	None*	Lined up to discharge of safety injection pumps
Refueling Water Storage Tank	Storage tank for refueling operations	Lined up to suction of safety injection, residual heat removal, and spray pumps	Source of borated water for core and spray nozzles	Lined up to suction of safety injection, residual heat removal and spray pumps
Accumulators (4)	None	Lined up to cold legs of reactor coolant piping	Supply borated water to core promptly	Lined up to cold legs of reactor coolant piping
Safety Injection Pumps (3)	Accumulator fill. Core cooling inventory makeup during RCS reduced inventory	Lined up to hot and cold legs of reactor coolant piping	Supply borated water to core	Lined up to cold legs of reactor coolant piping
Residual Heat Removal Pumps (2)	Supply water to core to remove residual heat during shutdowns	Lined up to cold legs of reactor coolant piping	Supply borated water to core	Lined up to cold legs of reactor coolant piping
Recirculation Pumps (2)	None	Lined up to cold legs of reactor coolant piping, spray headers and suction of safety injection pumps	Supply borated water to core and spray nozzles from recirculation sump	Lined up to cold legs or reactor coolant piping spray headers, and suction of safety injection pumps

*A modification replaced the concentrated boric acid in the BIT with refueling water, however, no credit is taken for any boron in the BIT by current accident analyses (Refer to FSAR Section 14.2.5).

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TABLE 6.2-9
(Cont.)

SHARED FUNCTIONS EVALUATION

Component	Normal Operating Function	Normal Operating Arrangement	Accident Function	Accident Arrangement
Conventional Service Water Pumps (3)	Supply river cooling water to component cooling heat exchangers (2)	Two pumps in service	Supply river cooling water to component cooling heat exchanger (1) and safeguards components	*One or two pumps in service
Component Cooling Pumps (3)	Supply cooling water to station nuclear components	Two pumps in service	Supply cooling water to residual heat exchangers S.I. pumps bearings and recirculation pump motor coolers	*One or two pumps in service
Residual Heat Exchangers (2)	Remove residual heat from core during shutdown	Lined up for residual heat removal pump operation	Cool water in containment sump for core cooling and containment spray	Lined up for the discharge of recirculation pumps
Component Cooling Heat Exchangers (2)	Remove heat from component cooling water	Two heat exchangers in service	Cool water for residual heat exchangers and core cooling pumps	Both heat exchangers in service
Auxiliary Component Cooling Pumps (4)	None	Lined up for pump operation	Provide component cooling water to recirculation pump motor coolers	Lined up for pump operation
Nuclear Service Water Pumps (3)	Supply river cooling water to station safeguards and non-nuclear components	One or two pumps in service	Supply river cooling water to component cooling heat exchanger (1) and safeguards components	*Two or three pumps depending on active failure (all are started automatically)

* Recirculation phase

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TABLE 6.2-10

ACCUMULATOR INLEAKAGE*

<u>Frequency of Level Adjustment Months</u>	<u>Leak Rate (cc/hr)</u>	<u>Leak Rate/Maximum Allowable Leak Rate</u>
1	787	7.87
3	262	2.62
6	131	1.31
7.9	100	1.00
9	87.4	0.874
12	65.6	0.656

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TABLE 6.2-11

INSTRUMENTATION READOUTS ON THE CONTROL BOARD
FOR OPERATOR MONITORING DURING RECIRCULATION

System	Valves	Valve Number
SIS		MOV 1802 A, B
SIS		MOV 1810
SIS		MOV 885 A, B
SIS		MOV 899 A, B
SIS		MOV 888 A, B
SIS		MOV 866 A, B
SIS		MOV 889 A, B
SIS		MOV 851 A, B
SIS		MOV 856, C, E, G
SIS		MOV 856 B, H, J
SIS		MOV 882
SIS		MOV 842
SIS		MOV 843
SIS		MOV 1852 A, B
SIS		MOV 1835 A, B
SIS		AOV 1851 A, B
SIS		MOV 894 A, B, C, D
SIS		MOV 850 A, C
ACS		MOV 744
ACS		MOV 745 A, B,
SIS		MOV 746
SIS		MOV 747
SIS		MOV 883
SIS		MOV 887 A, B
SIS		AOV 1813
SIS		MOV 1869 A, B
SIS		HCV 638
SIS		HCV 640
ACS		MOV 743
ACS		MOV 1870

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TABLE 6.2-11
(Cont.)

INSTRUMENTATION READOUTS ON THE CONTROL BOARD
FOR OPERATOR MONITORING DURING RECIRCULATION

System	Instruments	Channel Number
SIS		FI 945 A, B
SIS		FI 946 A, B, C, D
SIS		FI 924 A
SIS		FI 925
SIS		FI 926 (This line has been permanently locked closed: isolated by valve SI-856A).
SIS		FI 926 A (This line has been permanently locked closed: isolated by valve SI-856F).
SIS		FI 927
SIS		FI 980
SIS		FI 981
SIS		FI 982
SIS		LI 1251
SIS		LI 1252
SIS		LI 1253
SIS		LI 1254
SIS		LI 1255
SIS		LI 1256
SIS		PI 922
SIS		PI 923
SIS		PI 947
ACS		PI 635
ACS		FI 640 & FI 638
ACS		LIT 628 & LIT 629
ACS		TR 639 & TR 641
RCS		LRCA 459
RCS		LICA 460
RCS		LICA 461
RCS		LI 462
SIS		Safety Injection
SW		Service Water
ACS		Component Cooling
SIS		Containment Spray
SIS		Recirculation
ACS		Residual Heat Removal

TABLE 6.2-12

QUALITY STANDARDS OF SAFETY INJECTION SYSTEM COMPONENTS

RESIDUAL HEAT EXCHANGER

Tests and Inspections

1. Hydrostatic Test
2. Radiograph of longitudinal and girth welds (tube side only)
3. UT of tubing or eddy current tests
4. Dye penetrant test of welds
5. Dye penetrant test of tube to tube sheet welds
6. Gas leak test of tube to tube sheet welds before hydro and expanding of tubes

Special Manufacturing Process Control

1. Tube to tube sheet weld qualifications procedure
2. Welding and NDT and procedure review
3. Surveillance of supplier quality control and product

COMPONENT COOLING HEAT EXCHANGER

Test and Inspections

- Hydrostatic Test
- Dye penetrant test of welds

Special Manufacturing Process Control

- Welding and NDT and procedure review
- Surveillance of supplier quality control and product

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TABLE 6.2-12
(Cont.)

QUALITY STANDARDS OF SAFETY INJECTION SYSTEM COMPONENTS

SAFETY INJECTION, RECIRCULATION AND RESIDUAL HEAT REMOVAL
PUMPS

Tests and Inspections

Performance Test

Dye penetrant of pressure retaining parts (except Internal Recirculation Pump)

Hydrostatic Test

Special Manufacturing Process Control

Weld, NDT and inspection procedures for review

Surveillance of suppliers' quality control system and product

ACCUMULATORS

Test and Inspections

Hydrostatic test

Radiography of longitudinal and girth welds

Dye penetrant/magnetic particle of weld

Special Manufacturing Process Control

Weld, fabrication, NDT and inspection procedure review

Surveillance of suppliers' quality control and product

VALVES

A. Tests and Inspections

a) 200 psi and 200 F or below (cast or bar stock)

Dye Penetrant Test

Hydrostatic Test

Seat Leakage Test

[Deleted]

b) Above 200 psi and 200 F

Forged Valves (2½" and larger)

1. UT of billet prior to forging

2. Dye penetrant 100% of accessible areas after forging

3. Hydrostatic test

4. Seal leakage test

(ii) Cast Valves

1. Radiograph 100% (with radioactive service only)

2. Dye penetrant all accessible areas (with radioactive service only)

3. Hydrostatic test

4. Seat Leakage

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TABLE 6.2-12
(Cont.)

QUALITY STANDARDS OF SAFETY INJECTION SYSTEM COMPONENTS

[Deleted]

VALVES (continued)

- c) Functional Test Required for:
 - 1. Motor Operated Valves
 - 2. Auxiliary Relief Valves
- B. Special Manufacturing Process Control
 - 1. Weld, NDT, performance testing, assembly and inspection procedure review
 - 2. Surveillance of suppliers' quality control and product
 - 3. Special Weld process procedure qualification (e.g. hard facing)

[Deleted]

REFUELING WATER STORAGE TANK

A. Tests and Inspections

Vacuum box test of tank bottom seams

- 1. Hydrostatic test of tank
- 2. Hydrostatic test of tank heater coil
- 3. Spot radiography of longitudinal and girth welds

B. Special Manufacturing Process and Material Control

- 1. Weld, fabrication, NDT and inspection procedure review
- 2. Surveillance of suppliers' quality control system and product
- 3. Material chemical and physical properties certification

PIPING

A. Test and Inspections

Class 1501 and below

Seamless or welded. If welded 100% radiography is required, shop fabricated and field fabricated pipe weld joints are inspected as follows:

- 2501R – 601R – 100% radiographic inspection and penetrant examination
- 301R – 302 – 20% random radiographic inspection
- 151R – 152R – 100% liquid penetrant examination

B. Special Manufacturing Process Control

Surveillance of suppliers' quality control and product

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TABLE 6.2-13

NPSH REQUIREMENTS FOR CLASS 1 (SEISMIC) PUMPS

Pump	Operating Mode	NPSH Req'd	NPSH Avail.	Fluid Oper. Temp.	P Atmospheric	Elevation of Pump*
Containment Spray (2)	Two pumps taking suction from RWST @ 3,000 gpm each & pumping to spray header – until Transfer to Recirculation**	17.0 Ft	26.5 Ft	120° F	14.7 psia	Approx. 44'
	Two pumps taking suction from RWST @ 3,000 gpm each and pumping to spray header – until Termination of CS Pump operation***	17.0 Ft	17.5 Ft	120° F	14.7 psia	Approx. 44'
Safety Injection (3)	Injection to RCS-3 SI pumps @ 650 gpm each	30.0 Ft	42.1 Ft	100° F	14.7 psia	37' -3"
	Recirculation to RCS-2 SI pumps @ 675 gpm each (Fluid supplied by one internal recirculation pump)	35.0 Ft	79.9 Ft	256° F (Maximum)	138.7 psia (Developed from discharge pressure of internal recirculation pump(s))	37' -3" This value used in NPSHA calculation. Actual pump suction centerline elevation is 36' 8.5"
Residual Heat (2)	Injection to RCS-2 RHR pumps @ 3,000 gpm each	11 Ft	59.4 Ft	100° F	14.7 psia	17' - 0"
Internal Recir. (1)	Recirculation to RCS – one pump @ 4,149 gpm	9.25 Ft	10.17 Ft****	256° F (Maximum)	Pressure corresponding to saturation temperature of fluid in sump (33 psia max.)	37.85' (NPSH Reference point)

* Centerline of suction, except as noted.

** Sufficient NPSH is available per IP3-CAL-CS-02590 Rev. 0

*** Bounding Case since Design Basis has only one CS Pump operating during this scenario.

**** Single train lineup with recirculation containment spray in operation. Credits remainder of RWST water delivered into Containment prior to start of recirculation containment spray. (Ref. 11)

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TABLE 6.2-13
(Cont.)

NPSH REQUIREMENTS FOR CLASS 1 (SEISMIC) PUMPS

Pump	Operating Mode	NPSH Req'd	NPSH Avail.	Fluid Oper. Temp.	P Atmospheric	Elevation of Pump*
Comp. Cooling Water (1)	One pump, post Accident recirculation; @ 5817 gpm each	33 ft	39.9 ft at 192° F	186.6° F (Maximum)	14.7 psia	43' -3"
Motor Driven Auxiliary Feedwater (2)		18 ft	56 ft (31 pump) 55 ft (33 pump)	120°F (Maximum)	14.7 psia	20' -0.5"
Turbine Driven Auxiliary Feedwater (1)		14 ft	75 ft	120°F (Maximum)	14.7 psia	20' -3.5"
I.A. Compr. Closed Cooling Water (2)		less than 4 ft	flooded (head tank)	130° F	14.7 psia	16' -6"
Service Water (6) (vertical)		22 ft (6000 gpm) 29 ft (7500 gpm)	37.9 ft	28-95° F	14.7 psia	8' -6" (Centerline of discharge)
Diesel Fuel Oil Transfer (3) (vertical)		1 ft Subm. (Tk. Mounted)	6.39 ft submergence	35-110° F	14.7 psia	40' (Approximate centerline of discharge)
Primary Water Makeup (2)		5 ft	33 ft	40-100° F	14.7 psia	41' (Floor)

ATTACHMENT TO TABLE 6.2-13

SAMPLE CALCULATION FOR HEAD LOSS
DUE TO FRICTION TO VERIFY LOSS

The Sample NPSH Calculation for Head Loss Due to Friction To Verify NPSH for the CS Pumps has been Superseded by IP3-CAL-CS-02590, "Containment Spray Pump NPSH Review."

Ref: Perry's Chemical Engineering Handbook
4th Edition, page 603, equation 6-11

$$\text{NPSH}_A = h_{ss} - h_{fs} - p$$

h_{ss} = static suction head = vertical distance between free level of source of supply and pump suction center line plus absolute pressure at the free level.

h_{fs} = friction loss in suction line between source of supply and pump suction.

p = vapor pressure of liquid at pumping temperature

Example: Containment Spray Pumps – two pumps operating @3000 gpm each

6.3 CONTAINMENT SPRAY SYSTEM

6.3.1 Design Bases

The General Design Criteria presented and discussed in this section are those which were in effect at the time when Indian Point 3 was designed and constructed. These general design criteria, which formed the bases for the Indian Point 3 design criteria, were published by the Atomic Energy Commission in the Federal Register of July 11, 1967, and subsequently made a part of 10 CFR 50.

The Authority has completed a study of compliance with 10 CFR Parts, 20 and 50 in accordance with some of the provisions of the Commission's Confirmatory order of February 11, 1980. The detailed results of the evaluation of compliance of Indian Point 3 with the General Design Criteria presently established by the Nuclear Regulatory Commission (NRC) in 10 CFR 50 Appendix A, were submitted to NRC on August 11, 1980, and approved by the Commission on January 19, 1982. These results are presented in Section 1.3.

Containment Heat Removal Systems

Criterion: Where an active heat removal system is needed under accident conditions to prevent exceeding containment design pressure, this system shall perform its required function, assuming failure of any single active component. (GDC 52 of 7/11/67)

Adequate containment heat removal capability for the Containment is provided by two separate, full capacity, engineered safety feature systems: The Containment Spray System, whose components operate in the sequential modes discussed in 6.3.2, and the Containment Air Recirculation Cooling and Filtration System which is discussed in Section 6.4.

The primary purpose of the Containment Spray System is to spray cool water into the containment atmosphere (when appropriate) in the event of a Loss-of-Coolant Accident and thereby ensure that containment pressure does not exceed its design value of 47 psig at 271 F (100% R. H.). This protection is afforded for all pipe break sizes up to and including the hypothetical instantaneous circumferential rupture of a reactor coolant loop. Pressure and temperature transients for a Loss-of-Coolant Accident are presented in Chapter 14. Although the water in the core after a Loss-of-Coolant Accident is quickly sub-cooled by the Safety Injection System, the Containment Spray System design was based on the conservative assumption that the core residual heat is released to the Containment as steam.

Any of the following combinations of equipment will provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value, assuming that the core residual heat is released to the Containment as steam:

- Both containment spray pumps (and one of the two spray valves in the recirculation path)
- All five containment cooling fans (discussed in Section 6.4)
- One containment spray pump and any three out of the five containment cooling fans.

For design basis accidents in which failure of any single diesel generator is assumed, the resulting equipment configuration is also adequate to satisfy containment cooling requirements.

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Inspection of Containment Pressure Reducing System

Criterion: Design provisions shall be made to the extent practical to facilitate the periodic physical inspection of all important components of the containment pressure reducing systems, such as pumps, valves, spray nozzles and sumps. (GDC 58 of 7/11/67)

Where practicable, all active components and passive components of the Containment Spray System are inspected periodically to demonstrate system readiness. The pressure retaining components are inspected for leaks from pump seals, valve packing, flanged joints and safety valves. During operational testing of the containment spray pumps, the portions of the system subjected to pump pressure are inspected for leaks. Design provisions for inspection of the Safety Injection System, which also functions as part of the Containment Spray System, are described in Section 6.2.5.

Testing of Containment Pressure Reducing Systems Components

Criterion: The containment pressure reducing systems shall be designed, to the extent practical so that active components, such as pumps and valves, can be tested periodically for operability and required functional performance. (GDC 59 of 7/11/67)

All active components in the Containment Spray System were adequately tested both in pre-operational performance tests in the manufacturer's shop and by in-place testing after installation. Thereafter, periodic tests are also performed after any component maintenance. Testing of the components of the Safety Injection System which are used for containment spray purposes is described in Section 6.2.5.

The component cooling water pumps and the conventional service water pumps which apply the cooling water to the residual heat exchangers are in operation on a relatively continuous schedule during plant operation. Those pumps not running during normal operation are tested periodically by changing the operating pump(s).

Testing of Containment Spray Systems

Criterion: A capability shall be provided to the extent practical to test periodically the operability of the containment spray system at a position as close to the spray nozzles as is practical (GDC 60 of 7/11/67)

Permanent test lines for the containment spray loops are located so that all components up to the isolation valves at the spray nozzles may be tested. These isolation valves are checked separately.

The air test lines for checking that spray nozzles are not obstructed, connect downstream of the isolation valves. Air flow through the nozzles is monitored by means of the helium filled balloon method, or other suitable methods that can demonstrate that nozzles are not clogged.

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Testing of Operational Sequence of Containment Pressure Reducing Systems

Criterion: A capability shall be provided to test initially under conditions as close as practical to the design and the full operational sequence that would bring the containment pressure – reducing system into action, including the transfer to alternate power sources. (GDC 61 of 7/11/67)

Capability was provided to test initially, to the extend practical, the operational start-up sequence of the Containment Spray System including the transfer to alternate power sources.

Performance Objectives

The Containment Spray System was designed to spray at least 5200 gpm of borated water, into the Containment whenever the coincidence of two sets of two-out-of-three (high-high) containment pressure (approximately 50% of design value) signals occurs or a manual signal is given. Either of two subsystems containing a pump and associated valving and spray header are independently capable of delivering more than one-half of the design delivery flow, or at least 2600 gpm, based on a pump design flow of at least 2600 gpm at a containment back pressure of 47.0 psig. Actual flow is reduced by up to 150 gpm due to recirculation flow through the eductor resulting in a delivered flow of 2450 gpm per pump at a containment back pressure of 47.0psig. In the recirculation line only the eductor motive flow path is active as the spray additive flow path was isolated due to retirement of the NaOH spray additive system by License Amendment 236.

The design basis was to provide sufficient heat removal capability to maintain the post-accident containment pressure below 47 psig, assuming that the core residual heat is released to the Containment as steam.

A second purpose served by the Containment Spray System is to remove elemental airborne iodine from the containment atmosphere should it be released in the event of a Loss-of-Coolant Accident. The analysis showing the system's ability to limit offsite dose to within 10 CFR 100 limits after a hypothetical Loss-of-Coolant Accident is presented in Chapter 14. If all engineered safety features operate at design capacity, offsite doses will be limited to within the limits of 10 CFR 20.

The Containment Spray System was designed to operate over an extended time period following a Reactor Coolant System failure, as required to restore and maintain containment conditions at or near atmospheric pressure. It has the capability of reducing the containment post-accident pressure and consequent containment leakage.

Portions of other systems, which share functions and become part of the Containment Spray System when required, were designed to meet the criteria of this section. Neither a single active component failure in such systems during the injection phase, nor an active passive failure during the recirculation phase, will degrade the design heat removal capability of containment cooling (See Section 6.2.3).

System piping located within the Containment is redundant and separable in arrangement unless fully protected from damage which may follow any Reactor Coolant System loop failure.

System isolation valves relied upon to operate for containment cooling are redundant, with automatic actuation.

Service Life

All portions of the system located within the Containment were designed to withstand, without loss of functional performance, the post-accident containment environment and operate without benefit of maintenance for the period of time needed to restore and maintain containment conditions at near atmospheric pressure.

Codes and Classifications

Table 6.3-1 tabulates the codes and standards to which the Containment Spray System components were designed.

6.3.2 System Design and Operations

System Description

Adequate containment cooling and iodine removal are provided by the Containment Spray System, shown in Plant Drawings 9321-F-27353 and 27503 [Formerly Figures 6.2-1A and -B], whose components operate in sequential modes. These modes are:

- a) Spray a portion of the contents of the Refueling Water Storage Tank into the entire containment atmosphere using the containment spray pumps. During this mode, the spray stream removes iodine from the containment atmosphere by a washing action.
- b) Recirculation of water from the containment sump by the diversion of a portion of the recirculation flow from the Safety Injection System to the spray headers inside the Containment after injection from the Refueling Water Storage Tank has been terminated.

The bases for the selection of the various conditions requiring system actuation are presented in Chapter 14.

The principal components of the Containment Spray System, which provides containment cooling and iodine removal following a Loss-of-Coolant Accident consist of two pumps, sodium tetraborate baskets located in containment, spray ring headers, nozzles, and the necessary piping and valves. The containment spray pumps are located in the Primary Auxiliary Building and the spray pumps take suction directly from the Refueling Water Storage Tank.

The Containment Spray System also utilizes the two 100% capacity recirculation pumps, two residual heat exchangers and associated valves and piping of the Safety Injection System for the long-term recirculation phase of containment cooling and iodine removal after the Refueling Water Storage Tank has been exhausted.

The Containment Spray System suction piping and the Containment Spray pumps up to the first closed discharge line isolation valve will be maintained sufficiently full of water to ensure the system remains operable and performs properly.

The spray water is injected into the containment through spray nozzles connected to four 360 degree ring headers located in the containment dome area. Each of the spray pumps supplies two of the ring headers.

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Injection Phase

The spray system will be actuated by the coincidence of two sets of two-out-of-three high-high level containment pressure signals. This starting signal will start the pumps and open the discharge valves to the spray headers. If required, the operator can manually actuate the entire system from the Control Room, and periodically, the operator will actuate system components to demonstrate operability. Additionally, two current indicators, one per containment spray pump motor, monitor their operation once they are started.

Any "P" signal received without an accompanying "T" (i.e., "S") signal is considered to be a spurious "P" signal. The "P" signal is actuated by the Phase B, (high-high level) high containment pressure; the "T" (i.e., "S") signal is actuated by the Phase "A" (high level) high containment pressure.

In order to terminate and reset the containment spray system, the following steps need to be performed:

- 1) Depress both CS RESET Buttons;
- 2) Stop the operating CS Pumps(s);
- 3) Close the opened discharge valve(s) (866A/866B), and

To meet the containment sump conditions, the changeover from the injection phase to recirculation phase will be initiated after the injection of approximately 195,800 gallons of the Refueling Water Storage Tank capacity. Recirculation will commence after the changeover is completed and the remaining available 95,800 gallons will be injected into the Containment via one containment spray pump. This 95,800 gallon volume allows for operator action to complete the transfer to recirculation before the RWST is completely depleted. Final emptying of the RWST can be accomplished via the Containment Spray Pumps after recirculation has begun.

Sodium tetraborate is stored at elevation 46" inside the containment building. During the injection phase the level of the boric acid solution from containment spray, safety injection and the coolant lost from the reactor coolant system will rise above the sodium tetraborate baskets. The sodium tetraborate will dissolve into the solution, increasing the solution pH above 7.0 to enhance long-term iodine retention in the solution and to minimize corrosion.

Recirculation Phase

When the Refueling Water Storage Tank is exhausted, or sufficient sump level is obtained recirculation spray flow will be initiated. The operator can remotely open the stop valves on either of the two spray recirculation lines. Throttle valves in the injection lines to the core split the recirculation flow so that at least 662 gpm is delivered to the core and the remainder to the spray headers. With this split flow, decay heat can be removed by boil-off and the containment pressure maintained below design.

After the four-hour containment scrubbing operations, it is expected that spray flow could be discontinued while maintaining containment pressure with the containment fan cooler units, and returning all of the recirculated water to the core. In this mode, the bulk of the core residual heat is transferred directly to the sump by the spilled coolant to be eventually dissipated through the residual heat exchanger once the sump water becomes heated. The heat removal capacity of four-out-of-five fan coolers (with failure of any single diesel generator) is sufficient to remove the corresponding energy addition to the vapor space resulting from steam boil-off from the core, assuming flow into the core from one recirculation pump at the beginning of recirculation,

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without exceeding containment design pressure; hence, it is not expected that continued spray operation for containment heat removal would be required. Spray flow termination is also assumed in the chemical generation analyses for GL 2004-02 compliance. Longer spray times increase exposure time of Aluminum components in the containment to the spray solution and may result in additional chemicals (precipitants) being generated than accounted for in sump strainer head loss calculations.

Cooling Water

The cooling water supply for the residual heat exchangers is discussed in Section 6.2.

Change-Over

The sequence for the change-over from injection to recirculation is also discussed in Section 6.2.

Remotely operated valves of the Containment Spray System which are under manual control (that is, valves which normally are in their ready position and do not receive a containment spray signal) have their positions indicated on a common portion of the control board. At any time during operation, when one of these valves is not in the ready position for injection this is shown visually on the board. In addition, an audible annunciation alerts the operator as to the condition.

Charcoal Filter Dousing

A dousing system is provided for the carbon filter bank of each fan cooler unit of the Containment Air Recirculation Cooling and Filtration System. Each dousing system can be supplied with water from the containment spray headers as shown in Plant Drawing 9321-F-27353 [Formerly Figure 6.2-1A]. The dousing system was designed to be started manually by the operator following indication of a fire in a carbon filter bank if high temperature conditions were to occur as a result of a failure of a fan. Further details of the dousing system are given in Section 6.4

Prior to initial operation, the lines connected to the Containment Spray Pumps were cleaned by means of a temporary strainer located on the suction side of the containment spray pumps. This insured an adequate clean supply of water was available prior to initial plant operation. These pump strainers were subsequently removed. During plant operation, the Refueling Water Storage Tank (RWST) can be purified by means of the RWST Purification System. This is permitted under administrative controls (i.e., an operator familiar with the operational restrictions of the RWST Purification System who is in contact with the Control Room). This system is connected to Residual Heat Removal (RHR) Pump suction line. The RWST is purified by pumping the water through the Spent Fuel Pit Demineralizer and the Spent Fuel Pit Filter before returning it to the RWST. Also, the RWST Purification pump suction piping originally contained a strainer which was subsequently removed. Thus, the water for the Containment Spray System, therefore, will be of adequate quality to prevent clogging of the spray nozzles for the 1) Fan Cooler Unit carbon filter dousing system and 2) the spray ring headers located near the containment building dome. No other provisions are provided for filtering the RWST water. Drain valves are also provided upstream of the carbon filter isolation dousing valves to prevent the unwanted passage of water from entering into the carbon filters during isolation valve testing.

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During the post-LOCA recirculation mode of Safety Injection, Residual Heat Removal, and Containment Spray Systems operation, there are no provisions for filtering the water supplied to the carbon filter dousing system. While it is possible that one or more dousing nozzles could become clogged, a filter is not used for the following reasons:

- a) The dousing system is placed into operation manually, only after indication of a fire.
- b) A filter in the dousing water supply pipe to any of the five carbon filter units could itself become clogged and shut off all dousing water to that unit.
- c) Within each carbon filter unit, there is a redundancy of spray nozzles since there is some overlapping of sprays.
- d) Should one spray nozzle become clogged and the nearby carbon over- heats, a local fire could not spread since surrounding charcoal is being doused.

Components

All associated components, piping, structures and power supplies of the Containment Spray System were designed to seismic Class I criteria.

All components inside containment are capable of withstanding or are protected from differential pressures which may occur during the rapid pressure rise to 47 psig in ten (10) seconds. The lines of the system are protected from missile damage by the concrete crane wall and operating floor.

Parts of the system in contact with the spray solution are stainless steel or an equivalent corrosion resistant material.

The Containment Spray System shares the Refueling Water Storage Tank capacity with the Safety Injection System. For a detailed description of this tank, see Section 6.2

Pumps

The two containment spray pumps are of the horizontal, centrifugal type driven by electric motors. The design head of each pump is sufficient to continue at rated capacity, with a minimum level in the Refueling Water Storage Tank, against a head equivalent to the sum of the design pressure of the Containment, the head to the uppermost nozzles, and the line and nozzle pressure losses. Each pump motor is direct-coupled and large enough to meet the maximum power requirements of the pump. Their operation is monitored via the current indicators in the Control Room. The materials of construction suitable for use with the spray solution are stainless steel or equivalent corrosion resistant material. Design parameters are presented in Table 6.3-2 and the containment spray pump characteristics are shown on Figure 6.3-1.

The containment spray pumps are designed in accordance with the specifications discussed for the pumps in the Safety Injection System, Section 6.2.

The recirculation pumps of the Safety Injection System, which provide flow to the Containment Spray System during the recirculation phase, are described in Section 6.2

Details of the component cooling pumps and service water pumps, which serve the Safety Injection System, are presented in Chapter 9.

Heat Exchangers

The two residual heat exchangers of the Safety Injection System, which are used during the recirculation phase, are described in Section 6.2

Spray Nozzles

The spray nozzles, which are of the hollow cone, ramp bottom design, are not subject to clogging by particles ¼ inch or less in maximum dimension, and are capable of producing a surface area averaged drop diameter of approximately 1000 microns at 15 gpm and 40 psi differential pressure.

With the spray pump operating at design conditions and the Containment at design pressure, the pressure drop across the nozzles will exceed 40 psi.

During recirculation spray operation, the water is screened through the 3/32" diameter holes of the perforated cylindrical plate strainer top-hat modules before leaving the Recirculation or the Containment Sump. The spray nozzles are stainless steel and have a 3/8 inch diameter orifice. The nozzles are connected to four 360 degree ring headers (alternating headers connected) of radii 8' 2" (El. 228.5'), 25' 4" (El. 223.5'), 42' 3" (El. 218.5'), and 59' 6" (El. 213.5'). There are 315 nozzles distributed on the four headers. These nozzle and header arrangements result in maximum area coverage with either branch of the system operating alone, while assuring minimum overlap of spray trajectories in the minimum flow case. (See Chapter 14)

Spray Additive Tank

The spray additive tank was retired in place based on the use of sodium tetraborate baskets stored in the containment building. In response to NRC Generic Letter 2004-02 (Generic Safety Issue 191), the pH buffer material was changed from sodium hydroxide (NaOH) to sodium tetraborate by License Amendment 236 to minimize the potential for sump screen blockage due to the formation of chemical products. The sodium tetraborate baskets are described in Section 6.3.2.

Spray Additive Eductors

In the original plant design, the means of adding NaOH to the spray liquid was provided by a liquid jet eductor, a device which uses the kinetic energy of a pressure liquid to entrain another liquid, mix the two, and discharge the mixture against a counter pressure. The pressure liquid in this case was the spray pump discharge flow through the recirculation line of the pumps which entrained the NaOH solution and discharged the mixture into the suction of the spray pumps. The two eductors were designed to provide a spray pH between the limits stated in Section 1.3.1 of Appendix 6D during the injection phase. In the current plant design, the spray additive tank is isolated such that only the eductor motive flow path (through the pump recirculation line) is active and the eductors are no longer credited for pH control.

[Deleted]

PH adjustment of the Emergency Core Cooling Sump solution to a maximum pH of 7.4 and a minimum pH of 7.1 (See Appendix 6D) is initially performed by the sodium tetraborate baskets located in containment.

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There is a sampling line on the discharge of the recirculation pumps that permits periodic remote sampling of the sump fluid. The primary means for adjusting the sump pH, following the LOCA, is through the use of the chemical mixing tanks and the charging pumps.

Valves

The valves for the Containment Spray System were designed in accordance to the specifications discussed for the valves in the Safety Injection System (Section 6.2).

Piping

The piping for the Containment Spray system was designed in accordance to the specifications discussed for the piping in the Safety Injection System (Section 6.2).

The system was designed for 150 psig at 300 F on the suction side and 300 psig at 300 F on the discharge side of the spray pumps.

Motors for Pumps and Valves

The motors inside and outside containment for the Containment Spray System were designed in accordance with the specifications discussed for motors in the Safety Injection System. (See Section 6.2)

Electrical Supply

Details of the normal and emergency power sources are presented in the discussion of the Electrical Systems, Chapter 8.

Environmental Protection

The spray headers are located outside and above the reactor and steam generator concrete shield. Another shield, which is removable for refueling, also provides missile protection for the area immediately above the reactor vessel. The spray headers are therefore protected from missiles originating within the Reactor Coolant System.

Material Compatibility

Parts of the system in contact with the spray solution are stainless steel or an equivalent corrosion resistant material.

All exposed surfaces within the Containment have coatings which are not subject to interaction under exposure to the containment spray solution, with the exception of small amounts of aluminum associated with the nuclear flux instrumentation.

An evaluation of materials compatibility with the long term storage conditions of the original containment spray additive (NaOH) is given in Appendix 6E. Appendix 6E is retained for historical purposes.

Post-accident chemistry changes due to the elimination of the spray additive tank and the installation of sodium tetraborate baskets were evaluate and it was determined that this change has little effect on the compatibility of materials located in containment, that come in contact with

the initial spray and recirculation spray solution. This evaluation is documented in WCAP-16596-NP. An analysis of the materials exposed to the post-accident containment environment using the original containment spray additives (NaOH) solution is presented in Appendix 6D. Appendix 6D has been updated where appropriate to include post-accident buffer change to sodium tetraborate and much of the information for the original NaOH additive has been retained for historical purposes.

Maintaining the long-term pH of the recirculated ECC solution no less than 7.0 prevents chloride-induced stress corrosion cracking of austenitic stainless steel components and minimizes hydrogen produced by the corrosion of galvanized surfaces and zinc-based paints. These chemistry changes with sodium tetraborate do not affect the environmental qualifications of equipment located within the containment required to mitigate the consequences of design basis accidents as documented in Appendix 6D, Section 9.0 and Appendix 6F, Section 5.0.

Sodium Tetraborate Baskets

Sodium tetraborate is stored in eight baskets at elevation 46' in the containment building. During the injection phase the baskets will be flooded, allowing the sodium tetraborate to dissolve into the fluid for pH control. The eight baskets are constructed of stainless steel and are seismically qualified and mounted.

6.3.3 Design Evaluation

Range of Containment Protection

For up to the first 25 minutes following the maximum Loss-of-Coolant Accidents (i.e., during the time that the containment spray pumps take their suction from the Refueling Water Storage Tank), this system provides the design heat removal capacity for the Containment. After the injection phase, one spray pump continues to spray into the Containment for up to an additional thirty minutes. This continued spray injection is sufficient to maintain the containment pressure below the design value even if no containment fans were operating.

With the completion of containment spray injection, the operator sets up recirculation to one spray header and to the core; flows are adjusted so that sufficient cooled recirculated water is delivered to keep the core flooded as well as providing flow to one spray header. Flow is sufficient to maintain the containment pressure below the design value, if required. Spray flow termination is also assumed in the chemical generation analyses for GL 2004-02 compliance. Longer spray times increase exposure time of Aluminum components in the containment to the spray solution and may result in additional chemicals (precipitants) being generated than accounted for in sump strainer head loss calculations.

Any of the following combinations of equipment will provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value, assuming that the core residual heat is released to the containment as steam:

- Both containment spray pumps (and one of the two spray valves in the recirculation path)
- All five containment cooling fans (discussed in Section 6.4)
- One containment spray pump and any three out of the five containment cooling fans.

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For design basis accidents in which failure of any single diesel generator is assumed, the resulting equipment configuration is also adequate to satisfy containment cooling requirements.

During the injection and recirculation phases, the spray water is raised to the temperature of the Containment by falling through the steam-air mixture. The minimum fall path of the droplets is approximately 118 ft from the lowest spray ring headers to the operating deck. The actual fall path is longer due to the trajectory of the droplets sprayed out from the ring header. Heat transfer calculations, based upon 1000 micron droplets, show that thermal equilibrium is reached in a distance of approximately five feet. Thus the spray water reaches essentially the saturation temperature.

At containment design pressure (47 psig), at least 2450 gpm of borated water is injected into the containment atmosphere by one spray pump. At containment design temperature (271°F), the total heat absorption capability of one spray pump is approximately 205×10^6 Btu/hr based on the addition of 110°F refueling water. The IP3 Stretch Power Uprate analysis were performed using 110°F refueling water. The IP3 reanalysis to address NSAL-11-5 was performed using a maximum RWST temperature of 105°F.

When recirculation is initiated, approximately 95,800 gallons of refueling water is left available in the Refueling Water Storage Tank for spray pump usage. This supply is reserved to allow switchover to recirculation pumps and to provide containment pressure relief. When the Refueling Water Storage Tank is empty, or the sufficient sump level is obtained, the recirculation pumps supply the flow to the spray headers. Spraying of water from the sump into the containment atmosphere with one recirculation pump, after cooling to 134.7°F with a residual heat exchanger, results in a heat removal rate of 1.63×10^8 Btu/hr at design temperature. This heat removal balances decay heat after 5000 seconds. The prior 2 sentences are a description of the capability of the original system design, at the original plant operating conditions. The performance of the Containment Spray System (at current operating conditions) in containment pressure reduction is discussed in Chapter 14.

In addition to heat removal, the spray system is effective in scrubbing fission products from the containment atmosphere. However, quantitative credit is taken only for absorption of reactive and/or soluble forms of inorganic iodine in the analysis of the hypothetical accident (Section 14.3). A discussion of the effectiveness of containment spray as a fission product trapping process is contained in Appendix 6A. While sprays are an effective means to remove airborne iodine, retention of iodine in the sump solution requires that the solution pH be raised to 7.0 or above. This pH adjustment is provided by the sodium tetraborate stored in containment.

Any of the combinations of equipment (spray pumps and fans) required for containment heat removal will provide sufficient iodine trapping capability to ensure that post-accident fission product leakage (based on Alternate Source Term) does not result in exceeding the dose limits of 10 CFR 100. This is evaluated in Section 14.3.

System Response

The starting sequence of the containment spray pumps and their related emergency power equipment was designed so that delivery of the minimum required flow is reached in 43 seconds.

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The starting sequence is:

Sequence	Seconds (max)
1) Initiation of safety injection signal, including instrument lag*	2
2) Starting of emergency diesel generators	10
3) Starting of containment spray pumps	8 or 13
4) Acceleration and pipe fill time	32
Total – from event initiation	52 or 57

NOTE: If no LOOP, subtract 10 seconds.

Motor control centers are energized and valves are opened at the same time as the pumps are started. As described in Section 14.3, a delay of 60 seconds is assumed for the starting of the containment spray.

Single Failure Analysis

A failure analysis has been made on all active components of the system to show that the failure of any single active component will not prevent fulfilling the design function. This analysis is summarized in Table 6.3-4.

In addition, each spray header is supplied from the discharge of one of the two residual heat removal heat exchangers. As described in Section 6.2.3, these two heat exchangers are redundant and can be supplied with recirculated water via separate and redundant flow paths. The analysis of the Loss-of-Coolant Accident presented in Chapter 14 reflects the single failure analysis.

*NOTE: To reduce inadvertent Safety Injection System Actuation due to instrumentation lags in the engineered safeguards system high steamline flow, low average temperature T_{avg} /Low steamline pressure coincidence circuitry, a time delay will be installed in each train (a maximum time delay of 6 seconds will meet the acceptance criteria for a steam line rupture).

Reliance on Interconnected Systems

For the injection phase, the Containment Spray System operates independently of other Engineered Safety Features following a Loss-of-Coolant Accident, except that it shares the source of water in the Refueling Water Storage Tank with the Safety Injection System. The system acts as a backup to the Containment Air Recirculation Cooling and Filtration System for both the cooling and iodine removal functions. For extended operation in the recirculation mode, water is supplied through recirculation pumps.

During the recirculation phase, some of the flow leaving the residual heat exchangers may be diverted to the containment spray headers or the high head safety injection pumps. Minimum flow requirements are set for the flow being sent to the core and for the flow being sent to the containment spray headers such that at least 662 gpm is sent to the core. Sufficient flow instrumentation is provided so that the operator can perform appropriate flow adjustments with the remote throttle valves in the flow path as shown in Plant Drawing 9321-F-27503 [Formerly Figure 6.2-1B].

Normal and emergency power supply requirements are discussed in Chapter 8.

Shared Function Evaluation

Table 6.3-5 is an evaluation of the main components which have been discussed previously and a brief description of how each component functions during normal operation and during the accident.

Containment Spray Pump NPSH Requirements

The NPSH for the containment spray pumps is evaluated for injection operation. The beginning fill-up period of the injection phase gives the limiting NPSH requirements. The NPSH available is determined from the elevation head and vapor pressure of the water in the RWST and the pressure drop in the piping to the pump. Sufficient NPSH margin is available to prevent cavitation of the CS pumps under all operating conditions.

6.3.4 Minimum Operating Conditions

The Technical Specifications establish limiting conditions regarding the operability of the system when the reactor is above MODE 5.

6.3.5 Inspections and Tests

Inspections

All components of the Containment Spray System are inspected periodically to demonstrate system readiness.

The pressure containing systems are inspected for leaks from pump seals, valve packing, flanged joints and safety valves during system testing. During the operational testing of the containment spray pumps, the portions of the system subjected to pump pressure are inspected for leaks.

Pre-Operational Testing

Offsite Work

These components in the system were subjected to offsite test work:

- a) Spray pumps
- b) Spray nozzles
- c) Eductors

The spray pumps were subjected to conventional acceptance tests and the performance characteristics plotted to illustrate that the pumps met the design specification.

As part of the development work in support of Westinghouse plant equipment, a nozzle of the type used in the spray system was subjected to a performance test to demonstrate and prove the nozzle characteristics (e.g., flow/pressure drop, droplet size, spread of spray, etc.).

As part of the quality assurance program, a random 25% of the nozzles installed at the Indian Point 3 site were given a general performance test.

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The eductors were produced and tested in two stages.

A prototype was made to check nozzle calculations prior to manufacture of the stainless steel units

A performance test was made by the manufacturer on one of the finished stainless steel units to confirm the capacity at the specified conditions. A sugar-water solution was used to simulate the 30% sodium hydroxide suction fluid.

Onsite Test Work

The aim of onsite testing was to:

Demonstrate and prove that the system is adequate to meet the design pressure conditions; outside the Containment this involved part radiographic inspection and part hydro-testing; inside the Containment the spray headers were subjected to 100% radiographic inspection

Demonstrate that the spray nozzles in the containment spray header are clear of obstructions by passing air through the test connections

Verify that the proper sequencing of valves and pumps occurred on initiation of the containment spray signal and demonstrate the proper operation of all remotely operated valves

Verify the operation of the spray pumps; each pump was run at shut-off and the mini-flow directed through the normal path back to the Refueling Water Storage Tank. During this time, the mini-flow was adjusted to that required for routine testing

Demonstrate the operation of the spray eductors. The eductor and spray additive system were checked by running, in turn, each spray pump on mini-flow with the spray additive tank filled with water and open to the spray eductor suction. During drain down of the spray additive tank, the tank level and corresponding eductor suction flow was recorded via the system instrumentation. Finally, the system performance with water was extrapolated to that with sodium hydroxide and the adequacy of the system thus verified.

In order to establish a reference eductor flow for routine testing of the system, the above was made with the spray additive tank isolated and the eductor drawing water through the RWST/eductor suction test line.

Operational Testing

The aim of the periodic testing is to:

Verify that the proper sequencing of valves and pumps occurs on initiation of the containment spray signal and demonstrate the proper operation of all remotely operated valves.

Verify the operation of the spray pumps. Each pump is run at shut-off and the mini-flow directed through the normal path back to the Refueling Water Storage Tank.

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Demonstrate the operation of the spray eductors. Periodic testing of the spray eductors is no longer required based on retirement of the spray additive tank and replacement of the sodium hydroxide buffer with sodium tetraborate buffer by License Amendment 236. The remaining motive portion of the spray eductor is tested as part of the spray pump miniflow line during spray pump testing.

The operational testing of the Safety Injection System, described in Section 6.2.5, demonstrates proper transfer to the emergency diesel generator power source in the event of a loss of power.

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TABLE 6.3-1

CONTAINMENT SPRAY SYSTEM-CODE REQUIREMENTS

<u>Component</u>	<u>Code</u>
Valves	ANSI B16-5 (1955)
Piping (including headers and spray nozzles)	ANSI B31.1 (1955)

TABLE 6.3-2

CONTAINMENT SPRAY SYSTEM DESIGN PARAMETERS

PUMPS

Quantity	2
Design pressure, discharge, psig	300
Design pressure, suction, psig	300
Design temperature, F	150
Design flow rate, gpm	2600
Design head, ft	450
Maximum flow rate, gpm	3154
Shutoff head, ft	490
Motor HP	400
Type of Pump	Horizontal-Centrifugal

EDUCTORS

Quantity	2
Eductor Inlet (motive)	Injection Phase
Operating Fluid	Water (with >2400 but <2600 ppm boron)
Operating Pressure, psig	195
Operating Temperature	Ambient
Flow Rate, gpm	112 (design), ≤150(analyzed)
Discharge Head (including static pressure, friction loss, and discharge elevation), psig	0.4 to 16.5
Eductor Suction (Inactive – SAT flow path was isolated due to retirement of the NaOH spray additive system)	

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TABLE 6.3-3

[Deleted]

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TABLE 6.3-4

SINGLE FAILURE ANALYSIS – CONTAINMENT SPRAY SYSTEM

<u>Component</u>	<u>Malfunction</u>	<u>Comments and Consequences</u>
A. Spray Nozzles	Clogged	Large number of nozzles (315) renders clogging of a significant number of nozzles as incredible.
B. Pumps		
1) Containment Spray Pump	Fails to start	Two provided. Evaluation based on operation of one pump in addition to three out of five containment cooling fans operating during injection phase.
2) Recirculation Pump	Fails to start	Two provided. Evaluation based on operation of one pump and no containment cooling fans operating during recirculation phase.
3) Conventional and Nuclear Service Water Pumps	Fails to start	Six provided. Operation of three pumps during recirculation required.
4) Component Cooling Pumps	Fails to start	Three provided. Operation of two pumps during recirculation required.
5) Auxiliary Component Cooling Pump	Fails to start	Two pair provided, one pair for each recirculation pump. One of a pair required to operate.
C. Automatically Operated Valves: (Open on coincidence of two – 2/3 high containment pressure signals)		
1) Containment Spray Pump Discharge Isolation Valve (Valves 866A & 866B)	Fails to open	Two parallel path, each with one pump and one valve are provided. Operation of one path is required.
2) Isolation valve on component cooling water lines from residual heat exchangers (valves 822A & 822B)	Fails to open	Two parallel lines, one valve in either line is required to open.

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<u>Component</u>	<u>Malfunction</u>	<u>Comments and Consequences</u>
D. Valves Operated from Control Room for Recirculation		
1) Recirculation isolation (valves 1802A & 1802B)	Fails to open	Two valves in parallel, one valve is required to open.
2) Containment spray header isolation valve from residual heat exchangers (valves 889A & 889B)	Fails to open	Two valves provided. Operation of one required.
3) Residual heat removal pump recirculation online (valves 743 & 1870)	Fails to close	Two valves in series, one required to close.
4) Residual heat removal pump discharge line (valve 744 and check valve 741)	Fails to close	Two valves in series, one required to close (one valve is a check valve). (744 operated from Control Room once AC power restored to valves controls.)
E. Automatically Operated Valves (Close from the Control Room on injection to recirculation changeover)		
1) Isolation valves at spray pump discharge (motor operated valves 866A & 866B, check valves 867A & 867B, and manual valves 869A & 869B)	Fails to close	Check valve in series with one motor operated valve provided for each line. In addition, a manually operated isolation valve with IVSWS is provided in each line.
F. Valves Operated from Control Room for Charcoal Filter Dousing		
1) Isolation valves at filter unit (valves 880A & B, 880C & D, 880E & F, 880G & H, 880J & K)	Fails to open	Two valves provided for each of the five units. Operation of one valve per unit required.

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TABLE 6.3-5

SHARED FUNCTIONS EVALUATION

<u>Component</u>	<u>Normal Operating Function</u>	<u>Normal Operating Arrangement</u>	<u>Accident Function</u>	<u>Accident Arrangement</u>
Containment Spray Pumps (2)	None	Lined up to spray headers	Supply spray water to containment atmosphere	Lined up to spray headers

NOTE: Refer to Section 6.2 for a brief description of the Refueling Water Storage Tank, recirculation pumps, conventional service water pumps, component cooling pump, residual heat exchangers, component cooling heat exchangers and the auxiliary component cooling pumps which are also associated either directly or indirectly with the Containment Spray System.

6.4 CONTAINMENT AIR RECIRCULATION COOLING AND FILTRATION SYSTEM

6.4.1 Design Bases

The General Design Criteria presented and discussed in this section are those which were in effect at the time when Indian Point 3 was designed and constructed. These general design criteria, which formed the bases for the Indian Point 3 design, were published by the Atomic Energy Commission in the Federal Register of July 11, 1967, and subsequently made a part of 10 CFR 50.

The Authority has completed a study of compliance with 10 CFR Part 20 and 50 in accordance with some of the provisions of the Commission's Confirmatory Order of February 11, 1980. The detailed results of the evaluation of compliance of Indian Point 3 with the General Design Criteria presently established by the Nuclear Regulatory Commission (NRC) in 10 CFR 50 Appendix A, were submitted to NRC on August 11, 1980, and approved by the Commission on January 19, 1982. These results are presented in Section 1.3.

Containment Heat Removal Systems

Criterion: Where an active heat removal system is needed under accident conditions to prevent exceeding containment design pressure, this system shall perform its required function, assuming failure of any single active component. (GDC 52 of 7/11/67)

Adequate heat removal capability for the Containment is provided by two separate, full capacity, engineered safety features systems. These are the Containment Spray System, whose components are described in Section 6.3 and the Containment Air Recirculation Cooling and Filtration System, whose components operate as described in Section 6.4.2. These systems are of different engineering principles and serve as independent backups for each other.

The Containment Air Recirculation Cooling and Filtration System was designed to recirculate and cool the containment atmosphere in the event of a Loss-of-Coolant Accident and thereby ensures that the containment pressure will not exceed its design value of 47 psig at 271 F (100% relative humidity). Although the water in the core after a Loss-of-Coolant Accident is quickly subcooled by the Safety Injection System, the Containment Air Recirculation Cooling and Filtration System was designed on the conservative assumption that the core residual heat is released to the Containment as steam.

Any of the following combinations of equipment will provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value, assuming that the core residual heat is released to the Containment as steam:

- 1) All five containment cooling fans
- 2) Both containment spray pumps (and one of the two spray valves in the recirculation path)
- 3) Any three out of the five containment cooling fans and one of the containment spray pumps

For design basis accidents in which failure of any single diesel generator is assumed, the resulting equipment configuration is also adequate to satisfy containment cooling requirements.

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Inspection of Containment Pressure-Reducing System

Criterion: Design provisions shall be made to extent practical to facilitate the periodic physical inspection of all important components of the containment pressure-reducing systems, such as pumps, valves, spray nozzles, torus, and sumps. (GDC 58 of 7/11/67)

Design provisions were made to facilitate access for periodic visual inspection of all the important components of the Containment Air Recirculation Cooling and Filtration System.

Testing of Containment Pressure-Reducing Systems Components

Criterion: The containment pressure-reducing systems shall be designed to the extent practical so that components, such as pumps and valves, can be tested periodically for operability and required functional performance. (GDC 59 of 7/11/67)

The Containment Air Recirculation Cooling and Filtration System was designed so that the components can be tested periodically and, after any component maintenance, testing can be conducted for operability and functional performance.

The air recirculation and cooling units, and the service water pumps, which supply the cooling units, are in operation on an essentially continuous schedule during plant operation, and no additional periodic tests are required.

Testing of Operational Sequence of Containment Pressure-Reducing Systems

Criterion: A capability shall be provided to test initially under conditions as close as practical to the design and the full operational sequence that would bring the containment pressure-reducing systems into action, including the transfer to alternate power sources. (GDC 61 of 7/11/67)

Means were provided to test initially the full operational sequence of the air recirculation system, including transfer to alternate power sources.

Inspection of Air Cleanup Systems

Criterion: Design provisions shall be made to the extent practical to facilitate physical inspection of all critical parts of containment air cleanup systems, such as ducts, filters, fans, and dampers (GDC 62 of 7/11/67)

Access is available for periodic visual inspection of the Containment Air Recirculation Cooling and Filtration System components, including fans, cooling coils, dampers, filter units and ductwork.

Testing of Air Cleanup Systems Components

Criterion: Design provisions shall be made to the extent practical so that active components of the air cleanup systems, such as fans and dampers, can be tested periodically for operability and required functional performance. (GDC 63 of 7/11/67)

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The charcoal filters of the filtration system are bypassed during normal operation by closed dampers. The dampers in a non-operating unit can be periodically tested by actuating the controls and verifying deflection by instruments in the Control Room. Since the fans are normally in operation, no additional periodic fan tests are necessary.

Testing Air Cleanup Systems

Criterion: A capability shall be provided to the extent practical for insite periodic testing and surveillance of the air cleanup systems to ensure (a) filter bypass paths have not developed and (b) filter and trapping materials have not deteriorated beyond acceptable limits. (GDC 64 of 7/11/67)

Representative sample elements in each of the activated carbon filter plenums are removed periodically during shutdowns and tested on the site to verify their continued efficiency. After reinstallation, the filter assemblies are tested in place by aerosol injection to determine integrity of the flow path.

Testing of Operational Sequence of Air Cleanup Systems

Criterion: A capability shall be provided to test initially under conditions as close to design as practical, the full operational sequence that would bring the air cleanup systems into action, including the transfer to alternate power sources and the design air flow delivery capability. (GDC 65 of 7/11/67)

Means were provided to test under conditions of close to design as practicable the full operational sequence that would bring the Containment Air Recirculation Cooling and Filtration System into action, including transfer to the emergency diesel generator power source.

Performance Objectives

The Containment Ventilation System, Chapter 5, which all of the components of the Containment Air Recirculation Cooling and Filtration System (with the exception of the moisture separators, HEPA filters and charcoal filters) are a part of, was designed to remove the normal heat loss from equipment and piping in the Reactor Containment during plant operation and to remove sufficient heat from the Reactor Containment, following the initial Loss-of-Coolant Accident containment pressure transient, to keep the containment pressure from exceeding the design pressure. The fans and cooling units continue to remove heat after the Loss-of-Coolant Accident and reduce the containment pressure to near atmospheric pressure within the first 24 hours after the accident.

A second function of the Containment Air Recirculation Cooling and Filtration System is to remove fission products from the containment atmosphere should they be released in the event of an accident. The filtration capacity of the system is sufficient to reduce the concentration of fission products in the containment atmosphere following a loss of reactor coolant, to levels ensuring that the 2 hour and 30 day radiation (TEDE) doses will be limited to within the guidelines of 10 CFR 100 limits. Details of the site boundary dose calculation are given in Chapter 14 along with the equipment configurations resulting from a presumed loss of one diesel generator.

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The air recirculation filtering capacity used to satisfy the original design basis, was determined for the following conditions:

- 1) Containment leak rate of 0.1% per day for 24 hours and 0.05% per day after 24 hours
- 2) Conservative meteorology corrected for building wake effects
- 3) A 70% efficiency for filtration of organic iodine. (This assumes credit for the demonstrated ability to filter organic forms of iodine at high relative humidity with impregnated charcoal.)
- 4) Fission product release to the Containment per TID 14844 at a power level of 3216 MWt. This assumes no credit for safety injection in limiting fission product release.
- 5) Partial effectiveness of the filtration equipment. This assumes two of the five installed carbon filter assemblies are unavailable at the time of the loss of coolant.

In addition to the design bases specified above, the following objectives were met to provide the engineered safety features functions:

- 1) Each of the five fan-cooler units is capable of transferring heat at the rate of 49.0×10^6 Btu/hr from the containment atmosphere at the post-accident design conditions, i.e., a saturated air-steam mixture at 47 psig and 271° F. This heat transfer rate is that assigned to the fan-cooler units in the analysis of containment and related heat removal system capability in Chapter 14.

The establishment of basic heat transfer design parameters for the cooling coils of the fan-cooler units, and the calculation by computer of the overall heat transfer capacity are discussed in Chapter 14. Among the topics covered are selection of the tube side fouling factor, effect of air side pressure drop, effect of moisture entrainment in the air steam mixture entering the fan-coolers, and calculation of the various air side to water side heat transfer resistances.

- 2) In removing heat at the design basis rate, the coils are capable of discharging the resulting condensate without impairing the flow capacity of the unit and without raising the exit temperature of the service water to the boiling point. Since condensation of water from the air-steam mixture is the principal mechanism for removal of heat from the post-accident containment atmosphere by the cooling coils, the coil fins will operate as wetted surfaces under these conditions. Entrained water droplets added to the air-steam mixture, such as by operation of the containment spray system, will therefore have essentially no effect on the heat removal capability of the coils.
- 3) Each of the five air handling units is equipped with moisture separators and high efficiency particulate air (HEPA) filters rated for 8000 cfm unit flow. The latter are capable of 99.97% removal efficiency for 0.3 micronparticles at the post-accident conditions.

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- 4) Each of the five air handling units is capable of supplying air to separate carbon-bed filter units following an accident for fission product iodine removal. The design flow rate through each air handling unit is 69,500 cfm during normal operation and 34,000 cfm during accident conditions. The design flow rate through each carbon filter assembly is 8,000 cfm, at a face velocity of approximately 50 fpm. The remainder of the flow bypasses the filter assemblies. The carbon filter units are designed to remove at least 70% of the incident radioactive iodine in the form of methyl iodide (CH_3I). These are the iodine removal efficiencies assumed in the analysis of containment capability to retain fission product iodine under the post-accident design conditions in Chapter 14.

In addition to the above design bases, the equipment was designed to operate at the post-accident conditions of 47 psig and 271° F for three hours, followed by operation in an air-steam atmosphere at 20 psig, 219° F for an additional 21 hours. The equipment design will permit subsequent operation of an air-steam atmosphere at 5 psig, 152 F for an indefinite period. See Appendix 6F for details of the IP3 Equipment Qualification Program.

All components are capable of withstanding or are protected from differential pressures which may occur during the rapid pressure rise to 47 psig in ten (10) seconds.

Portions of other systems which share functions and become part of this containment cooling system when required were designed to meet the criteria of this section. Neither a single active component failure in such systems during the injection phase nor an active/passive failure during the recirculation phase will degrade the heat removal capability of containment cooling (See Section 6.2.3).

Where portions of these systems are located outside of containment, the following features were incorporated in the design for operation under post-accident conditions:

- a) Means for isolation for any section
- b) Means to detect and control radioactivity leakage into the environs, to the limits consistent with guidelines set forth in 10 CFR 100.

6.4.2 System Design and Operations

The flow diagram of the Containment Air Recirculation Cooling and Filtration System is shown on Plant Drawing 9321-F-40223 [Formerly Figure 6.4-2].

Individual system components and their supports meet the requirement for Class I (seismic) structures and each component is mounted to isolate it from fan vibration.

Containment Cooling System Characteristics

The air recirculation system consists of five 20% capacity air handling units, each including motor, fan, cooling coils, moisture separators, HEPA filters, carbon filters with spray and fire detection, dampers, duct distribution system, instrumentation and controls. The units are located on the intermediate floor between the containment wall and the primary compartment shield walls. The moisture separators, HEPA filters and activated carbon filter assembly is normally isolated from the main air recirculation stream. Part of the air flow (air-steam mixture) is bypassed through the filtration section of the units (moisture separators, HEPA filters, and carbon filter assembly) to remove volatile iodine following an accident.

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Each fan was designed to supply 69,500 cfm at approximately 6.3" s.p. (0.075 lb/ft³ density) during normal operation and 34,000 cfm, at approximately 8.6" s.p. (0.175 lb/ft³ density), during accident operation.

The fans are direct driven, centrifugal type, and the coils are plate fintube type. Each air handling unit is capable of removing 49.0×10^6 Btu/hr from the containment atmosphere under accident conditions. A flow of 1400 gpm of service (cooling) water is supplied to each unit during accident conditions. The design maximum river water inlet temperature is 95°F.

Duct work distributes the cooled air to the various containment compartments and areas. During normal operation, the flow sequence through each air handling unit is as follows; inlet dampers, cooling coils, fan, discharge header. Roughing filters were installed up-stream of the cooling coils during plant clean-up. Any time these filters are used, they must be removed prior to exceeding cold shutdown. In lieu of using roughing filters, cooling coil thermal performance is assured by alternate means. (Reference Generic Letter 89-13)

In the event of an accident, the flow is split into two parts: a minimum of 8000 cfm passes through the filtration section consisting of moisture separation, HEPA filters, and carbon filter assembly, and the remainder of the flow bypasses the filtration section of the units and passes through the cooling coils with the filtration flow. The bypass flow control is accomplished via a damper that fails closed to a pre-set position for accident operation.

Plant Drawing 636F269 [Formerly Figure 6.4-1] is an engineering layout drawing of an air handling unit, showing the arrangement of the above components in the unit. Plant Drawing 9321-F-40253 [Formerly Figure 6.4-3] shows the location of the five units on the intermediate floor (elevation 68' -0").

Actuation Provisions

A tight closing damper isolates the filtration section of the units from the normal operating components. Upon loss of air pressure to the damper control cylinder, the damper and accident filtration inlet door opens to permit air to flow through this section. The damper and door are fail safe open via weights and spring, respectively.

Upon either manual or automatic actuation of the safety injection safeguards sequence, the accident damper and door are tripped to the accident position. Accident position is also the "fail-safe position." Electrically operated environmentally qualified three-way solenoid valves are used with the dampers and door to control the instrument air supply (control air).

The containment pressure is sensed by six separate pressure transmitters located outside the Containment. Containment pressure is communicated to the transmitters through three 1" stainless steel lines penetrating the containment vessel. A high containment pressure signal automatically actuates the safety injection safeguard sequence (see Section 6.2.2), which trips the valves to the accident position.

The fans are part of the engineered safety features and either all five or at least three out of the five fans will be started after an accident, depending on the availability of emergency power. (See Chapters 8 and 14)

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Overload protection for the fan motors is provided at the switchgear by over-current trip devices in the motor feeder breakers. The breakers can be operated from the Control Room and can be reclosed from the Control Room following a motor overload trip.

Redundant flow switches in the system, operating both normally and post-accident, indicate whether air is circulating in accordance with the design arrangement. Abnormal flow alarms are provided in the Control Room.

Flow Distribution and Flow Characteristics

The location of the distribution ductwork outlets, with references to the location of the air handling unit return inlets, ensures that the air is directed to all areas requiring ventilation before returning to the units. The arrangement is shown in Plant Drawing 9321-F-40223 [Formerly Figure 6.4-2].

In addition to ventilating areas inside the periphery of the shield wall, the distribution system also includes two branch ducts located at opposite extremes of the containment wall for ventilating the upper portion of the Containment. These ducts are provided with nozzles and extend upward along the containment wall as required to permit the throw of air from nozzles to reach the dome area and assure that the discharge air will mix with the atmosphere.

The air discharge inside the periphery of the shield wall circulates and rises above the operating floor through openings around the steam generators where it will mix air displaced from the dome area. This mixture returns to the air handling units through floor grating located at the operating floor directly above each air handling unit inlet. The temperature of this air is essentially the ambient existing in the containment vessel.

The steam-air mixture from the Containment entering the cooling coils during the accident will be at approximately 271° F and have a density of 0.175 pounds per cubic foot. Part of the water vapor will condense on the cooling coil, and the air leaving the unit will be saturated at a temperature slightly below 271° F. The fluid also enters the moisture separators at approximately 271° F and saturated (100% R.H.) condition.

The purpose of the moisture separators is to remove the entrained moisture to protect the HEPA Filters from excessive pressures due to water buildup during accident operation. The fluid flows through the HEPA filter and into the carbon filters, and to the cooling coils picking up some sensible heat from the fan and fan motor before flowing through into the distribution header. This sensible heat will increase the dry-bulb temperature slightly above 271° F and will decrease the relative humidity slightly below 100%.

With a flow rate of 34,000 cfm from each fan under accident conditions and the containment free volume of 2,610,000 ft³ the recirculation rate with five fans operating is approximately 4 containment volumes per hour.

Carbon Filter High Temperature Detection and Dousing System

The five carbon filter assemblies are provided with high-temperature detectors and associated alarms in the Control Room. Each carbon filter assembly is also provided with a spray system for water dousing upon an indication of a fire. See Figure 6.4-4 and Section 6.3.2.

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Capability for detecting and alarming the presence of fires and localized hot spots in the carbon filters is provided by a system of temperature switches. Each carbon filter plenum (containing one bank of 12 adsorbers) is provided with temperature switches. These switches are uniformly distributed for good coverage. The temperature switches are factory-set for 400° F, (which is below the carbon ignition temperature of 644° F) and they are wired in parallel to a common alarm in the Control Room. Thus closing of a single switch will actuate the alarm to indicate a high temperature condition in the filter plenum.

The water dousing system provided with each carbon filter plenum was designed to drench the adsorbers thoroughly in the extremely unlikely event of a carbon fire during the post-accident recovery. Water for this system is obtained from the main headers of the containment spray system through a separate 2 inch stainless steel line to each filter plenum. There are two normally closed motor operated valves in parallel in each 2 inch line.

The Containment Spray System is automatically actuated and will be running in the event of a Loss-of-Coolant Accident (injection phase). Upon indication of a fire in a filter unit, the operator manually initiates filter dousing by actuating the parallel-connected isolation valves for each filter assembly. Because of the piping arrangement either of the two spray pumps can be used to feed the dousing lines. The dousing flow (approximately 12 gpm per fan cooler unit) was sized to wet the carbon completely and remove the decay heat of the adsorbed iodine thereby preventing heating to the ignition temperature. The system was designed so containment spray at slightly reduced flow can continue simultaneously with filter dousing. Provisions were made for testing of the dousing nozzles through an air hose connection.

During the recirculation phase of core cooling, operation of the dousing system is the same as above except that water to the spray headers is supplied from the discharge of the residual heat removal heat exchangers.

Cooling Water for the Fan Cooler Units

The cooling water requirements for all five fan cooling units during a major loss of primary coolant accident and recovery are supplied by two of the three nuclear service water pumps. The Service Water System is described in Chapter 9.

The cooling water discharges from the cooling coils to the discharge canal and is monitored for radioactivity by routing a small bypass flow from each through a line monitored by two adjacent-to-line radiation detection assemblies. Note that for a fan cooler unit (FCU) cooling coil failure, assumed to occur concurrently with a large break LOCA, radiological accessibility to identify and isolate the failed FCU will be possible prior to initiation of external recirculation. Upon indication of radioactivity in the effluent, each cooler discharge line is monitored individually to locate the defective cooling coil which when identified would remain isolated, and operation would continue with the remaining units. The service water system pressure at locations inside the Containment is 15 to 20 psig, which is below the containment design pressure of 47 psig. However, since the cooling coils and service water lines are completely closed inside the Containment, no contaminated leakage is expected into these units.

Local flow indication is provided outside containment for service water flow to each cooling unit. Abnormal flow alarms are provided in the Control Room. Service water common inlet temperatures, and all outlet temperatures are displayed at the Plant Computer.

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During normal plant operation, flow through the cooling units is throttled for containment temperature control purposes by a valve on the common discharge header from the cooling units. Two additional independent, full flow, isolation valves open automatically in the event an engineered safeguards actuation signal to bypass the control valve. Both valves fail in the open position upon loss of air pressure and either valve is capable of passing the full flow required for all five fan cooling units.

Environmental Protection

All system control and instrumentation devices required for containment accident conditions were located to minimize the danger of control loss due to missile damage. Flow switches in the ductwork system, operating both normally and post-accident, indicate whether air is circulating in accordance with the design arrangement. Abnormal flow alarms are provided in the Control Room. Post-accident monitoring of certain parameters are qualified for a post-accident environment.

All fan parts, valve shaft and disc seating surfaces and ducts in contact with the containment fluid are protected against corrosion. The fan motor enclosures, electrical insulation and bearings were designed for operation during accident conditions. See Appendix 6F for qualification testing.

Verification tests under the combined environmental effects of high humidity, pressure, temperature, radiation and applicable chemical concentration of the assembled system (as opposed to tests being performed separately) would require the entire Containment Building or a prototype to be adapted to the test conditions.

No significant information would result from such a test beyond that already obtained from the testing of individual components. The combination of the individual component test results assures the performance of the containment air recirculation system under accident conditions.

All of the air handling units are located on the intermediate floor between the containment vessel and the primary compartment shield wall. The distribution header and service water cooling piping are also located outside the shield wall. This arrangement provides missile protection for all components.

Components

Moisture Separators

The moisture separators were designed to protect the HEPA Filters from adverse pressures due to water buildup following a Loss-of-Coolant Accident⁽³⁾. The water flow rate entering the moisture separators is approximately 0.31 gpm per moisture separator (8 per unit) and the moisture separator effluent has essentially zero moisture content.

Each bank was designed for horizontal air flow, and is composed of 8 elements. Each element or separator is 24 in x 24 in x 4 in (minimum) thick and is mounted in a steel support frame.

A steel drain trough was incorporated for each horizontal tier of separators to collect and remove the water that is recovered from the air stream. Further, the design enables the separators to be removed from the upstream side of the support frame.

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In order to prevent the bypass of air around the bank, air-tight seals were provided between the floor, walls, plenum, and around the perimeter of each moisture separator. The tight seal is accomplished by gaskets, and adhesive which can withstand a temperature of 300°F. The thickness of the gaskets is ¼ in for the separator elements and do not extend into the media area when installed.

The moisture separator elements are of fire resistant construction, and consist of mats of stainless steel wire mesh. Non-stainless steel parts used in the construction are protected against corrosion by the application of a protective coating. The separator element frames are stainless steel.

Roughing Filters

The roughing filters remove the large particles from the air stream before it contacts the cooling coils. The roughing filters were installed during plant clean up. These are efficient for removing large particles. Under normal air flow, they offer a resistance to air flow of approximately 0.2 inches of water.

As in the case for all components of the air handling recirculating system, the bank was designed for horizontal air flow. The filter media is of fire retardant construction composed of a fiber mat support screen and fasteners.

HEPA (Absolute) Filters

The high efficiency particulate air (HEPA) filters are capable of 99.97% removal efficiency for 0.3 micron particles at the post-accident design conditions. All materials of construction of these filters are compatible with the spray solution in the post-accident environment with the conditions they are exposed to where the moisture separators upstream protected the HEPA filters. See Appendix 6D, Section 8.3.

The filter media is made of glass fiber (meets MIL-F-51079) and can withstand the incident ambient steam/air temperature conditions and 100% relative humidity. Filter frames were made of stainless steel. The filters meet MIL-STD-282, MIL-F-51068C, MIL-F051079A, and UL 586.

Fan-Motor Units

The five containment cooling fans are of the centrifugal, non-overloading direct drive type.

Each fan can provide a minimum flow rate of 34,000 cfm when operating against the system resistance of approximately 8.6" s.p. existing during the accident condition (0.175 lb/ft³ density, a containment pressure of 47 psig, and a temperature of 271° F).

The reactor containment fan cooler motors are Westinghouse, totally enclosed water cooled, 225 horsepower, induction type, 3 phase, 60 cycle 720 rpm, 440 volt with ample insulation margin. Significant motor details are as follows:

a) Insulation

Class F (NEMA rated total temperature 155° C) or Class H (NEMA rated total temperature 180° C). It is impregnated and varnish dipped to give a homogeneous insulation system which is highly impervious to moisture. Internal leads and the

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terminal box-motor interconnection are given special design consideration to assure that the level of insulation matches or exceeds that of the basic motor system. At incident ambient and load conditions (271° F and 225 hp), the motor insulation hot spot temperature is not expected to exceed 127° C. The Fan Cooler Motors and their lubrication are environmentally qualified for use inside the containment building as documented in their respective EQ files.

b) Heat Exchanger

An air to water heat exchanger is connected to the motor to form an entirely enclosed cooling system. The heat removal capability under LOCA conditions is 110,868 Btu/hr at saturation conditions (271° F, 47 psig). Air movement is through the heat exchanger and is returned to the motor. Two vent valves permit incident ambient (increasing containment pressure) to enter the motor air system so the bearings will not be subjected to differential pressure. The cooling coil condensate drain line will enable pressure equalization as the containment pressure is reduced by the motor heat exchanger. The drain is piped to the containment cooler drain system.

The motor cooling coils have tubes of AL-6X stainless steel with continuous copper plate-type turbex fins. Water boxes made of 904L stainless steel provide for the water supply and discharge which are common with the containment cooler water system, i.e., supplied from the nuclear service water header. A two pass water flow design counter to the air flow is employed.

c) Bearings

The motors are equipped with high temperature grease lubricated ball bearings as would be required if the bearings were subjected to incident ambient temperatures. Continuous bearing monitoring is provided which will alarm in the Control Room.

Conduit (Connection) Box

The motor leads are brought out of the frame through a seal and into a cast iron sealed explosion-proof type of conduit box.

Factory Tests

In addition to the usual quality control tests which were performed to give assurance that the motors meet design specifications, special tests were performed to demonstrate that insulation margins were built in as specified. The completely wound stators have been given a special high potential test to ground. The stators were immersed in water, meggered, given a high potential test while immersed, and baked. After passing the water tests, the rotor was baked, given a final coating dip and were baked again.

Carbon Filters

The carbon filters were fabricated with stainless steel frames filled with activated carbon, which is tested in accordance with ASTM D3803-1989, per the IP3 response to Generic Letter 99-02. The cell construction insures compacted carbon beds of uniform density and thickness.

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The design flow rate through each carbon filter unit is 8,000 cfm, at a face velocity of approximately 50 fpm. These units were designed to remove at least 70% of the incident radioactive iodine in the form of methyl iodine (CH_3I). ⁽¹⁾⁽²⁾

Fan Cooling Coils

The coils were fabricated of copper plate fin vertically oriented on AL6X (Allegheny-Ludlum) tubes. The heat removal capability of the cooling coils is 49.0×10^6 Btu/hr per air handling unit at saturation conditions (271°F, 47 psig).

The design internal pressure of the coil is 150 psig at 300 °F and the coils can withstand an external pressure of 47 psig at a temperature of 271°F without damage.

Each recirculating unit consists of eight (8) coil units mounted in two banks of four (4) coils high. These banks are located one behind the other for horizontal series air flow, and the tubes of the coil are horizontal with vertical fins.

Each coil assembly consists of one bank of six row deep coils. Each of the two banks contain four Westinghouse Sturtevant designation WC-36114 (36" high by 114" long) coils. The coils are stacked four high to a bank. The total coil assembly (two banks of coils) is 3½ feet wide. There are 12 rows of tubes in the horizontal flow direction and a total of 96 rows of tubes in the vertical direction. Cooling water flow is 1/3 velocity. Cooling coils have 8.5 fins per inch of tube length. (For normal operation, the coils will remove 2.3×10^6 Btu/hr.)

Local flow indication is provided outside containment for service water flow to each cooling unit. Abnormal flow alarms are provided in the Control Room. Service water common inlet temperatures, and all outlet temperatures are displayed at the Plant Computer. Alarms indicating abnormal service water flow and radioactivity are provided in the Control Room.

The coils are provided with drain, pans and drain piping to prevent flooding during accident conditions. This condensate is drained to the Containment Sump. (See Section 6.7.)

Ducting

The ducts were designed to withstand the sudden release of Reactor Coolant System energy and energy from associated chemical reactions without failure due to shock or pressure waves by incorporation of dampers along the ducts which open at slight overpressure, 3.0 psi. The ducts were designed and are supported to withstand thermal expansion during an accident.

Ducts are of welded and flanged construction. All longitudinal seams were welded. Where flanged joints were used, joints are provided with gaskets suitable for temperatures to 300 °F.

Ducts were constructed of galvanized sheet metal.

Dampers

Dampers are held in their operating position by gravity weight and air cylinders. A leak tight damper prevents leakage of air into the charcoal filter compartment during normal operation thereby preventing carbon deterioration. The damper and blow-in door fail to the open position to assure flow through the carbon filters during the accident condition.

Electrical Supply

Details of the normal and emergency power sources are presented in Chapter 8.

Further information on the components of the Containment Air Recirculation Cooling and Filtration System is given in Chapter 5.

6.4.3 Design Evaluation

Range of Containment Protection

The Containment Air Recirculation Cooling and Filtration System provides the design heat removal capacity and the design iodine removal capability for the containment following a Loss-of-Coolant Accident assuming that the core residual heat released to the Containment as steam. The system accomplishes this by continuously recirculating the air-steam mixture: 1) through cooling coils to transfer heat from containment to service water, and 2) through activated carbon filters to transfer methyl iodide to the filters from the air-steam mixture.

The performance of the Containment Recirculation Cooling and Filtration System in pressure reduction and iodine removal is discussed in Chapter 14.

Any of the following combinations of equipment will provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value, assuming that the core residual heat is released to the Containment as steam.

- 1) All five containment cooling fans.
- 2) Both containment spray pumps (and one of the two spray valves in the recirculation path).
- 3) Any three out of the five containment cooling fans and one containment spray pump.

For design basis accidents in which failure of any single diesel generator is presumed, the resulting equipment configuration is also adequate to satisfy containment cooling and filtration requirements.

System Response

The starting sequence of the last of the five containment cooling fans (at design conditions five of the fans and one of the nuclear service water pumps operate during normal power operations for containment ventilation) and the related emergency power equipment were designed so that delivery of the minimum required air flow to the carbon filters and cooling water flow is reached in 58 seconds. In the analysis of the containment pressure transient, Section 14.3, a delay time of 48.21 seconds was assumed.

The starting sequence is:

Sequence	Seconds
1)* Initiation of safety injection signal including instrument lag	2
2) Starting of emergency diesel generators	10
3) Starting of containment cooling fan	18 or 23
4) Acceleration time (estimated)	10
TOTAL – from event initiation	40 or 45

*NOTE: If no LOOP, subtract ten seconds.

The valves are actuated to safeguards position by the safety injection signal.

Single Failure Analysis

A failure analysis was made on all active components of the system to show that the failure of any single active component will not prevent fulfilling the design function. This analysis is summarized in Table 6.4-1

The analysis of the Loss-of-Coolant Accident presented in Chapter 14 is consistent with the single failure analysis.

Loss of a fan motor in a unit should not result in ignition of the carbon. Ignition should be prevented by backflow induced by the operating fans. If, during normal operation, an increase in the carbon filter temperature were to occur, the high temperature detectors would initiate an alarm and the operator would cause the affected bank to be sprayed.

Reliance on Interconnected Systems

The Containment Air Recirculation Cooling and Filtration System is dependent on the operation of the Electrical and Service Water Systems. Cooling water to the coils is supplied from the Service Water System. Three nuclear service water pumps are provided, only two of which are required to operate during the post-accident period for the containment cooling function.

Shared Function Evaluation

Table 6.4-2 is an evaluation of the main components which have been discussed previously and a brief description of how each component functions during normal operation and during the accident.

Reliability Evaluation of the Fan-Cooler Motor

The basic design of the motor and heat exchanger as described herein is such that the incident environment is prevented, in any major sense, from entering the motor winding. When entering in a very limited amount (equalizing motor interior pressure), the incoming atmosphere is directed to the heat exchanger coils where moisture is condensed out. If some quantity of moisture should pass through the coil, the changed motor interior environment would "clean up" as that interior air continually recirculates through the heat exchanger.

It will be noted that the motor insulation hot spot temperature is not expected to exceed 127 C even under incident conditions. Normal life could be expected with a continuous hot spot of 155 C.

During the lifetime of the plant, these motors perform the normal heat removal service and as such are only loaded to approximately 90-100 hp, which is less than half the rated horsepower.

The bearings were designed to perform in the incident ambient temperature conditions. However, it should be noted that the interior bearing housing details are cooled by the heat exchanger. It is expected that bearing temperatures would be 125 C to 140 C under incident conditions.

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The insulation has high resistance to moisture and tests performed indicate the insulation system would survive the incident ambient moisture condition without failure (see Appendix 6F). The heat exchanger system of preventing moisture from reaching the winding keeps the winding in much more favorable conditions. In addition, it should be noted that at the time of the postulated incident, the load on the fan motor would increase, internal motor temperature would increase, and would, therefore, tend to drive any moisture if present, out of the winding. Additionally, the motors are furnished with insulation voltage margin beyond the operating voltage of 440 volts.

Following the incident rise in pressure, it is not expected that there will be significant mixing of the motor (closed system) environment and the containment ambient.

The heat exchanger was designed using a conservative 0.001 fouling factor.

To prove the effectiveness of the heat exchanger in inhibiting large quantities of the steam air mixture from impinging on the winding and bearings, a full scale motor of the exact same type as described was subjected to prolonged exposure of accident conditions, which included high pressure and temperature, 100% relative humidity, and chemical spray. The test exposed the motor to a steam air mixture as well as boric acid and alkaline spray at approximately 80 psig and saturated temperature conditions.

Insulation resistance, winding and bearing temperature, relative humidity, voltage and current as well as heat exchanger water temperature and flow were recorded periodically during the test.

Following the test, the motor was disassembled and inspected to further assure that the unit performed as designed. The post-testing inspection showed no degradation of the motor components.

Carbon Filter Performance

The design flow rate through each carbon filter bank is 8000 cfm, at a face velocity of approximately 50 fpm. The bed thickness of 2 inches provides a superficial residence time of 0.2 sec. Under the design conditions of temperature, pressure, and humidity, and with moisture uptake limited to less than 1 gram of water per gram of dry charcoal, the expected penetration of incident I_2 vapor is less than 0.1%.

An evaluation of the effectiveness of charcoal filters in removing organic iodide from the containment atmosphere is presented in Appendix 6C.

6.4.4 Minimum Operating Conditions

The Technical Specifications establish limiting conditions regarding the operability of the air recirculation units when in MODES 1, 2, 3, and 4.

6.4.5 Inspection and Testing

Inspection

Access is available for visual inspection of the containment fan coolers and recirculation filtration components, including fans, cooling coils, dampers, filter units and ductwork. Provision was made for ready removal of the filters for inspection and testing.

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Technical Specifications (TS) require charcoal and HEPA filter testing to demonstrate operability any time a fire, chemical release or work done on the filters could alter integrity. Technical Specification surveillance testing is based upon a maximum flow of 8,800 cfm giving a minimum safety factor of 1.87 for methyl iodide removal efficiency while allowing 1% bypass. 50.59 Evaluation 98-3-017 HVAC demonstrates, for purpose of TS implementation, that welding is not a fire, a chemical release or work that could alter filter integrity. The 50.59 evaluation also demonstrates that organic components from painting and similar activities could not alter filter integrity until the organic components are above 10% by weight and concludes that filter testing shall be performed when the organic components are greater than or equal to 2.5% by weight organics. Administrative controls are required to evaluate the percent by weight of organics when activities that could generate organics are conducted.

Testing

Component Testing

The HEPA filters used in the containment fan cooler system were specified to operate in the post-accident containment environment. Each filter was subjected to standard manufacturer's efficiency and production tests prior to shipment.

These included flow resistance tests and the Standard Efficiency Penetration Test requiring that penetration does not exceed 0.03 percent for 0.3 micron diameter homogeneous diocylphthalate (DOP) particles.

Evaluation tests were performed on sample filters constructed from the filter medium to demonstrate retention of strength under wet conditions, and to demonstrate the effectiveness of the moisture separator for protecting the HEPA filter as follows:

- 1) The filter was exposed to a flow of wet steam (at 280 F, 50 psig, and 100% R.H.) and water spray (with 2500 ppm boron, pH of 10) in a test facility which simulated the actual filter installation. The water was injected ahead of the filter with a nozzle designed to produce a fine spray. Free (unentrained) moisture was removed by means of a moisture separator upstream of the HEPA filter but no provisions were made for removal of entrained moisture entering the HEPA filter.
- 2) The filter pressure drop was measured to demonstrate that its resistance to flow under the simulated accident conditions did not significantly increase.

Only filters of a type which have been certified to have passed these tests were accepted for initial use or replacement in the fan coolers application.

Any of the activated carbon filter adsorbers in the air handling units can be removed and tested periodically for effectiveness in removing methyl iodine forms. In addition, periodic in-place testing of the filtration assemblies is made by injection of a DOP aerosol in the air stream at the filter inlet to verify the leak-tightness of individual filter elements and their frame seals. The activated charcoal used shall have an ignition temperature not less than 300 °F.

The in-place testing of HEPA filters with DOP aerosol is performed to demonstrate gasket and media integrity, and overall bank efficiency, rather than an investigation of individual pinhole leaks in the filter media. Test procedures are available at the plant site for inspection.

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Large filter installations are tested to within 20% of the full rated flow. Besides limiting the quantity of DOP to be introduced into the ventilation system and containment, this is the flow rate at which filter imperfections would most readily be noticeable. At higher flow rates, the turbulent flow through pinhole leaks and other imperfections becomes proportionally less than the laminar flow through the media. Filters therefore increase in efficiency with increasing air flow rates. When an in-place test, carried out in accordance with NRC requirements, shows an unacceptable efficiency, leakage paths can be detected by passing the aerosol through the system, and probing the downstream side of the bank of filters and mounting frame with a probe connected directly to the photometer.

Carbon filters will not be contaminated with DOP, and will be removed from the system before any testing takes place.

For small charcoal filter installations, filter bank efficiencies are determined using Freon 112, in accordance with the procedures described in DP1082 "Standardized Nondestructive Test of Carbon Beds for Reactor Confinement Applications." For large installations, the use of this procedure would necessitate the release of excessive amounts of Freon 112 within the Containment. Due to problems of possible fluoride formation, it is desirable to keep freon contamination to a minimum.

Consequently, instead of introducing Freon into a fully operating ventilation system, carbon filter installations are tested a few cells at a time. The procedure is to use a small temporary portable blower and duct on the inlet side, while checking for leakage on the downstream side of the installation with a halogen leak detector. Any Freon pickup which may occur in the section of the filter under test will be released following the completion of the test and will have no effect on filter performance.

The dampers and blow-in door on each air handling unit can be operated periodically to assure continued operability.

System Testing

Each fan cooling unit was tested after installation for proper flow and distribution through the duct distribution system. Four fan cooling units are used during normal operation. (Five will only be required for normal operation at design conditions, i.e., when the service water inlet temperature is above 85°F, and this condition is expected to exist only for relatively short periods, if at all.) The fan not in use can be started from the Control Room to verify readiness. The dampers and blow-in door directing flow through the carbon filter banks are tested only when the fan is not running.

After reinstallation following testing, the carbon filter units are tested in place by aerosol injection to determine integrity of the flow path.

Operational Sequence Testing

The test described in Section 6.2.5 serves to demonstrate proper transfer and sequencing of the fan motor supplies from the diesel generators in the event of loss of power. A test signal is used to demonstrate proper damper motion and fan starting prior to installation of the carbon filters. The test verifies proper functioning of the vane-switch flow indicators.

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Verification of Heat Removal Capability

Since river water is circulated through the containment fan coolers and since the fans are used under both normal and accident conditions, provisions were made for verifying that the fan cooler heat removal capability does not degrade below that assumed in the containment integrity evaluation.

Instrumentation provided to verify heat removal capability is:

- 1) An Environmentally qualified RTD is installed on the inlet line to provide indication on the Plant Computer.
- 2) Flow measurement of each fan cooler service water effluent is provided by an indicating flow transmitter installed in each line. The transmitter actuates a common annunciator alarm in the Control Room upon the decrease of flow in any fan cooler line.

In addition, the flow indicator provides for manual balance of flow rates in all five fan coolers.

- 3) In the event of fan cooler coil service water out-leakage, the head of water will increase in a stand pipe weir which collects condensate runoff from each of the fan cooler, motor heat exchanger and demister (moisture separator).

The increase of head is measured by a differential pressure transmitter. The current output signal is connected to an alarm unit which actuates a control room annunciator. Through the use of a weir level indicator and selector switch, the operator can determine the location of the leakage.

- 4) The containment building ambient temperature is controlled by manually modulating the service water flow through the fan coolers.

The indicating range is 40° - 400°F. Average temperature indication is available at the QSPDS display and at the CR Supervisory Panel. Individual temperatures for each RTD are displayed at the Plant Computer. An increase in ambient temperature indicates fan cooler failure or service water discharge control valve malfunction. Either cause can be easily checked. To ensure reliability of the temperature instruments, perform a channel check daily and a channel calibration every 24 months.

References

- 1) "Connecticut-Yankee Charcoal Filter Tests," CYAP 101, (December 1966).
- 2) Ackley, R.D. and R. E. Adams, "Trapping of Radioactive Methyl Iodide from Flowing Steam-Air: Westinghouse Test Series," ORNL-TM-2728, (December 1969).
- 3) Reactor Containment Fan Cooler System Technical Manual, Nuclear Technology Division of Westinghouse Electric Corporation, PE-1275, (May 1982).
- 4) Attachment I to IPN-89-046, "Proposed Change to Technical Specifications to Increase the Design Bases Ultimate Heat Sink Temperature."

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TABLE 6.4-1

SINGLE FAILURE ANALYSIS – CONTAINMENT AIR RECIRCULATION COOLING AND FILTRATION SYSTEM

Component	Malfunction	Comments and Consequences
A. Containment Cooling Fan	Fails to start	Five provided. Limiting containment integrity evaluation based on four fans in operation and one containment spray pump operating during the injection phase. Other configurations are evaluated in Chapter 14.
B. Nuclear Service Water Pumps	Fails to start	Three provided. Two required for operation for containment cooling function.
C. Automatically Operated Valves: (Open on automatic safeguards sequence)		
1) Carbon filter compartment Damper and Blow-in door	Fails to open	Five filters provided. Evaluation based on three filters in operation and one containment spray pump in operation during the injection phase.
2) Nuclear service water discharge line isolation Valve	Fails to open	Two provided. Operation of one required.

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TABLE 6.4-2

SHARED FUNCTION EVALUATION

<u>Component</u>	<u>Normal Operating Function</u>	<u>Normal Operating Arrangement</u>	<u>Accident Function</u>	<u>Accident Arrangement</u>
Containment Cooling Fan Unit (5)	Circulate and cool containment atmosphere	Up to five fan units in service	Circulate and cool containment atmosphere	Three to five fan units in service
Nuclear Service Water Pumps (3)	Supply river cooling water to fan units	One or two pumps in service	Supply river cooling water in service components	Two or three pumps
Carbon Filter Units (5)	None	Isolated from normal fan discharge flow	Remove iodine from containment atmosphere	Lined up to receive fan discharge flow

6.5 ISOLATION VALVE SEAL WATER SYSTEM

6.5.1 Design Bases

The Isolation Valve Seal Water System assures the effectiveness of the containment isolation valves located in lines connected to the Reactor Coolant System, or that could be exposed to the containment atmosphere during any condition which requires containment isolation, by providing a water seal (and reliable means for injecting seal water between the seats and stem packing of the globe and double disc types of isolation valves, and into the piping between closed gate valves and diaphragm type isolation valves. This system operates to limit the fission product release from the Containment.

Although no credit is taken for operation of this system in the calculation of offsite accident doses, it does provide assurance that the containment leak rate is lower than that assumed in the accident analysis should an accident occur. Design provisions for inspection and testing of the Isolation Valve Seal Water System are discussed in Section 6.5.5.

See Section 5.2, Containment Isolation System for containment isolation diagrams, tabulation of isolation valve parameters and a description of the derivation of "Phase A" and "Phase B" containment isolation signals. Section 5.2.2 discusses the containment isolation valves that are sealed, post-accident, by air from the Penetration and Weld Channel Pressurization System.

6.5.2 System Design and Operation

System Description

The Isolation Valve Seal Water System flow diagram is shown in Plant Drawing 9321-F-27463 [Formerly Figure 6.5-1]. System operation is initiated either manually or by any automatic safety injection signal. When actuated, the Isolation Valve Seal Water System interposes water inside the penetrating line between two isolation points located outside the Containment. The resulting water seal blocks leakage from the Containment through valve seats and stem packing. The water is introduced at a pressure slightly higher than the containment peak accident pressure. The high pressure nitrogen supply used to maintain pressure in the seal water tank does not require any external power source to maintain the required driving pressure. The possibility of leakage from the Containment or Reactor Coolant System past the first isolation point is thus prevented by assuring that if leakage does exist, it will be from the seal water system into the Containment.

The following lines would be subjected to pressure in excess of the isolation Valve Seal Water System design pressure (150 psig) in the event of an accident, due to operation of the recirculation pumps:

- 1) Residual heat removal loop return line
- 2) Bypass line from residual heat exchanger outlet to safety injection pumps suction
- 3) Residual heat removal loop sample line
- 4) Recirculation pump discharge sample line
- 5) Residual heat removal pump miniflow line
- 6) Residual heat removal loop outlet line.

Lines 1, 2, and 6 are isolated by double disc gate valves, while 3, 4 and 5 are each isolated by two valves in series. These valves can be sealed by nitrogen gas from the high pressure nitrogen supply of the Isolation Valve Seal Water System. A self-contained pressure regulator

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operates to maintain the nitrogen injection pressure slightly higher than the maximum expected line pressure. These valves are closed during power operation, and the nitrogen gas injection is manually initiated.

The system includes one seal water tank capable of supplying the total requirements of the system. The tank is pressurized from the system's own supply of high pressure nitrogen cylinders through pressure control valves. Design pressure of the tank and injection piping* is 150 psig, and relief valves are provided to prevent overpressurization of the system if a pressure control valve fails, or if a seal water injection line communicates with a high pressure line due to a valve failure in the seal water line.

In certain lines approximately three inches and larger, double disc gate valves are used for isolation. A drawing of this valve is presented in Figure 6.5-2. Redundant isolation barriers are provided when the valve is closed. The upstream and downstream discs are forced against their respective seats by the closing action of the valve. Seal water is injected through the valve bonnet and pressurizes the space between the two valve discs. The seal water pressure in excess of the potential accident pressure eliminates any outleakage past the first isolation point.

For smaller lines, isolation is provided by two globe valves in series (inboard and outboard) outside containment, with the seal water injected into the pipe between the valves. The valves are oriented such that the seal water wets the stem packing and plugs as follows:

- 1) On process lines ingressing containment (incoming lines) IVSWS will wet both the stem packings and plugs on both the inboard and outboard valves.
- 2) On process lines egressing containment (outgoing lines) IVSWS will wet both the stem packing and plug on the inboard valve, but only wet the plug on the outboard valve. One exception would be the Steam Generator Blowdown CIVs where both the inboard and outboard valves stem packings and plugs are wetted by IVSWS.

*NOTE: The injection piping runs and nitrogen supply piping are fabricated using 3/8 inch O.D. tubing, which is capable of 2500 psig service.

When the valves are closed for containment isolation, the first isolation point is the valve plug in the valve closest to Containment. One exception would be the RCP seal injection line CIVs where both the valve plug and stem packing act as isolation points. In a number of the smaller lines, isolation is provided by two diaphragm valves in series, with the seal water injected into the pipe between the valves.

The normally acceptable leakage across both the seat and stem packing of any gate or globe valve is 10 cc/hr/inch of nominal pipe diameter. Tests on these valves have indicated that much lower leakage rates can be expected. However, design of the Isolation Valve Seal Water System is based on the conservative assumption that all isolation valves are leaking at five times the acceptable value, or 50 cc/hr/inch of nominal pipe diameter. In addition, should one of the isolation valves fail to seat, flow through the failed valve will be limited to approximately 100 times the maximum acceptable leakage value, or 1000 cc/hr/inch of nominal pipe diameter, by the resistance of the seal water injection path. A water seal at the failed valve is assured by proper slope of the protection line, or a loop seal, or by additional valves on the side of the isolation valves away from the Containment.

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The seal water tank is sized to provide at least a 24 hour supply of seal water under the most adverse circumstances, i.e., isolation valves leaking at the design rate of 50 /cc/hr/ inch, plus the failure of the largest containment isolation valve to seat and leakage at the maximum rate of 1000 cc/hr/inch. The seal water volume required to satisfy these conditions is approximately 144 gallons. A 176 gallon seal water tank is provided. If all of the isolation valves seat properly, as expected, the tank volume is sufficient for approximately 2½ days of operation at design seal water flow rates before makeup is required. Two separate sources of makeup water are provided to ensure that an adequate supply of seal water is available for long term operation: the primary water storage tank and the city water system. The tank is instrumented to provide local indication of pressure and water level; low water level, low pressure and high pressure are alarmed on the Waste Disposal/Boron Recycle Panel on EI. 55 of the PAB. Any of these local alarms will be annunciated in the Control Room.

Seal Water Actuation Criteria

Containment isolation (Section 5.2) and seal water injection are accomplished automatically for the penetrating lines requiring early isolation, and manually for others, depending on the status of the system being isolated and the potential for leakage in each case. Generally, the following criteria determine whether the isolation and seal water injection are automatic or manual.

Automatic containment isolation and automatic seal water injection are provided for lines that could communicate with the containment atmosphere and be void of water following a Loss-of-Coolant Accident. These lines are as follows:

- Pressurizer Steam and Liquid Space Sample lines
- Excess Letdown Heat Exchanger Cooling Water supply and return lines
- Letdown line
- Reactor Coolant System sample line
- Containment vent header
- Reactor coolant drain tank gas analyzer line
- Station air line

Automatic containment isolation and automatic seal water injection are also provided for the following lines, which are not connected directly to the Reactor Coolant System, but terminate inside the Containment at certain components. These components can be exposed to the reactor coolant or containment atmosphere as the result of leakage or failure of a related line or component. The isolated lines are not required for post-accident service. These lines are as follows:

- Pressurizer relief tank gas analyzer line
- Pressurizer relief tank makeup line
- Safety Injection System test line
- Reactor coolant drain tank pump discharge line
- Steam generator blowdown lines
- Steam generator blowdown sample lines
- Demineralized water to Containment
- Accumulator sample line
- Containment sump pump discharge

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Manual containment isolation and manual seal water injection are provided for lines that are normally sufficiently filled with water and will remain sufficiently filled following the Loss-of-Coolant Accident, and for lines that must remain in service for a time following the accident. The manual seal water injection assures a long term seal. These lines are as follows:

- Reactor coolant pump seal water supply lines
- Reactor coolant pump seal water return line
- Charging line
- Safety injection header
- Containment spray headers
- Reactor coolant pump cooling water supply and return lines

Manual containment isolation and manual seal gas injection are provided except as noted for lines that are sufficiently filled with water during the accident but which are at a pressure higher than that provided by the Isolation Valve Seal Water System. These lines must remain in service for a period of time following the accident, or may be placed in service on an intermittent basis following the accident. These lines are as follows:

- Bypass line from residual heat exchanger outlet to safety injection pump suction
- Residual heat removal loop return line
- Residual heat removal loop sample line (automatic isolation)
- Safety injection line from boron injection tank
- Recirculation pump discharge sample line
- Residual heat removal pump miniflow line
- Residual heat removal loop outlet line

Seal water injection is not necessary to insure the integrity of isolated lines in the following categories:

Lines that are connected to non-radioactive systems outside the Containment and in which a pressure gradient exists which opposes leakage from the Containment. These include nitrogen supply lines to the pressurizer relief tank, accumulators, reactor coolant drain tank, the instrument air header, the weld channel pressurization air lines, and the pressurizer pressure deadweight calibrator line.

Lines that do not communicate with the Containment or Reactor Coolant System and are missile protected throughout their length inside containment. These lines are not postulated to be severed or otherwise opened to the containment atmosphere as a result of a Loss-of-Coolant Accident. These include the steam and feedwater headers and the Containment ventilation system cooling water supply and return lines.

Lines that are designed for post-accident service as part of the engineered safety features. The only line in this category is the containment sump recirculation line. This line is connected to a closed system outside containment.

Special lines such as the fuel transfer tube, containment purge ducts and the containment pressure relief line. The zone between the two gaskets sealing the blind flange to the inner end of the fuel transfer tube is pressurized to prevent leakage from the containment in the event of an accident. The zone between the two butterfly valves in each containment purge duct is pressurized above incident pressure while the valves are closed during power operation as are the two spaces between the three butterfly valves in the containment pressure relief line.

Components

All associated components, piping and structures of the Isolation Valve Seal Water System are designed to Class I seismic criteria.

There are no components of this system located inside containment. The piping and valves for the system including the air-operated valves are designed to accordance with the ANSI Code for Pressure Piping (Power Piping Systems) B31.1.

6.5.3 Design Evaluation

The isolation Valve Seal Water System (IVSWS) provides an extremely prompt and reliable method of limiting the fission product release from the containment isolation valves in the event of a loss-of-coolant accident.

The employment of the system during a loss-of-coolant accident, while not considered for analysis of the consequences of the accident, provides an additional means of conservatism in ensuring that leakage is minimized. No detrimental effect on any other safeguards systems will occur should the seal water system fail to operate.

Post-accident access for a total of 22 manual IVSWS valves fed from line No 539 and 542 is provided. (Refer to Plant Drawing 9321-F-27463 [Formerly Figure 6.5-1]) Operation of these valves in an acceptable radiation field area during post-accident plant operating conditions is possible.

System Response

Automatic containment isolation will be completed within approximately two seconds following generation of the Phase A containment isolation signal. This is the approximate closing time of the air operated containment isolation valves (Section 5.2). This closing time is a nominal value only, and is not used as a valve stroke performance criteria nor as an input to any accident analysis or off-site dose calculation. Since the Isolation Valve Seal Water System is actuated by this signal, automatic seal water injection will be in effect within this nominal time period.

Subsequent generation of the Phase B isolation signal on containment high pressure (spray actuation signal) will close a number of motor operated isolation valves with an approximate closing time of 10 seconds (Section 5.2). This closing time is a nominal value only, and is not used as valve stroke performance criteria nor as an input to any accident analysis or off-site dose calculation.

Seal water (or Nitrogen) injection flow is manually initiated to these valves as well as the remainder of the containment isolation valves that receive a manually initiated closure signal at the appropriate time following the loss-of-coolant accident.

Single Failure Analysis

A single failure analysis is presented in Table 6.5-2. The analysis shows that the failure of any single active component will not prevent fulfilling the design function of the system.

Reliance on Interconnected Systems

The Isolation Valve Seal Water System can operate and meet its design function without reliance on any other system. Electric power is not required for system operation, although instrument power is required to provide indication in the control room of seal water tank pressure and level.

Shared Function Evaluation

Table 6.5-3 is an evaluation of the main components discussed previously and brief description of how each component functions during normal operation and during an accident.

6.5.4 Minimum Operating Conditions

The Technical Specifications establish limiting conditions regarding the operability of the system when the reactor is critical.

6.5.5 Inspections and Tests

Inspections

The system components are all located outside the containment and can be visually inspected at any time.

Component Testing

Each automatic isolation valve can be tested for operability at times when the penetrating line is not required for normal service. Lines supplying automatic seal water injection can be similarly tested.

System Testing

Containment isolation valves and the Isolation Valve Seal Water System can be tested periodically to verify capability for reliable operation. The seal water tank pressure and water level can be observed locally; low water level, low pressure and high pressure will be annunciated locally on the Waste Disposal Panel.

The system is not in service during the Containment Integrated Leakage Rate Test.

Operational Sequence Testing

The capacity of the system to deliver water in accordance with the design was verified initially during the pre-operational test period of plant construction and startup. Prior to plant operation, a containment isolation test signal was used to ensure proper sequence of isolation valve closure and seal water addition.

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TABLE 6.5-1

ISOLATION VALVE SEAL WATER TANK

Number	1
Total volume, ft ³	23.6
Minimum volume, gal	144
Material	ASTM A-240
Design pressure, psig	150
Design temperature, F	200
Operating pressure, psig	45 – 100
Operating temperature, F	Ambient
Code	ASME UPV (Sect. VIII)

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TABLE 6.5-2

SINGLE FAILURE ANALYSIS – ISOLATION VALVE SEAL WATER SYSTEM

<u>Component</u>	<u>Malfunction</u>	<u>Comments</u>
A. Automatically Operated Valves (Open on Phase A Containment Isolation Signal)		
1) Isolation valve for automatic injection headers	Fails to open	Two provided. Operation of one required
B. Instrumentation		
1) Level transmitter	Fails	Local level indicator at tank also provided
2) Pressure transmitter	Fails	Local pressure indicator at tank Also provided

TABLE 6.5-3
SHARED FUNCTIONS EVALUATION

<u>Component</u>	<u>Isolation Valve Seal Water Storage Tank (1)</u>	<u>N₂ Supply Bottles (3)</u>
Normal Operating Function	None	None
Normal Operating Arrangement	Lined up to seal water injection piping	Lined up to seal water tank
Accident Function	Source of water for sealing isolation valves	Source of N ₂ to maintain seal water pressure
Accident Arrangement	Lined up to seal water injection piping	Lined up to seal water tank

6.6 CONTAINMENT PENETRATION AND WELD CHANNEL PRESSURIZATION SYSTEM

6.6.1 Design Basis

The WCCPPS is incorporated into the design of Indian Point 3 as an engineered safety feature. Its purpose is to provide pressurized gas to all containment penetrations and most liner inner weld seams such that in the event of a LOCA, there would be no leakage through these potential leakage paths from the containment to the atmosphere. Spaces between selected isolation valves are also served by the WCCPPS. By maintaining the WCCPPS at some pressure level above the peak accident pressure, any postulated leakage would be into the Containment rather than out of the Containment.

Although the WCCPPS is an engineering safety feature, no credit is taken for its operation in calculating the amount of radioactivity released for offsite dose evaluations. For Indian Point 3, offsite dose calculations were performed to demonstrate compliance with 10 CFR 100 guidelines and the results were well within those guidelines. In those calculations, it was assumed that the Containment leaked at a rate of 0.1% per day of Containment free volume for the first 24 hours and 0.045% per day of Containment free volume thereafter.

6.6.2 System Design and Operation

System Description

The containment Penetration and Weld Channel Pressurization System is shown in Plant Drawing 9321-F-27263 [Formerly Figure 6.6-1]. A regulated supply of clean and dry compressed air from either of the plant's 100 psig compressed air systems located outside the Containment is supplied to all containment penetrations and most inner liner weld channels. The system maintains a pressure in excess of containment calculated peak accident response pressure continuously during all reactor operations thereby ensuring that there will be no out-leakage of the containment atmosphere through the penetrations and most liner welds during an accident. Following a design basis accident, the system will maintain pressure greater than the post accident containment pressure for 24 hours. Typical piping and electrical penetrations are described in Chapter 5.

The primary source of air for this system is the instrument air system (Chapter 9). Two instrument and control air compressors are used, although only one is required to maintain pressurization at the maximum allowable leakage rate of the pressurization system.

The plant air system acts as a backup to the instrument and control air system added reliability. One plant air compressor is available for backup.

A standby source of gas pressure for the system is provided by a bank of nitrogen cylinders (see Table 6.6-1). The associated nitrogen system will automatically deliver nitrogen at a slightly lower pressure than the normal regulated air supply pressure. Thus, in the event of failure of the normal and backup air supply systems during periods when the system is in operation, the penetration and weld channel pressure requirements will automatically be maintained by the nitrogen supply. This assures reliable pressurization under both normal and accident conditions.

The backup gas supply is sized such that over the 24 hour period following a LOCA, WCCPPS pressure starts above the peak containment pressure, and then is continually maintained above the post-LOCA containment pressure profile.

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The design basis leakage rate from the WCCPPS is 0.2% of containment free volume per day, with 0.1% of containment free volume per day leaking into the containment and an identical amount leaking to the environment.

Once the air receiver pressure decays to a 45 psig zone pressure, an automatic transfer to the backup nitrogen cylinders occurs. The WCCPPS zone is then fed nitrogen until the nitrogen accumulators reach equilibrium pressure with the air receiver. Once this equilibrium pressure is reached, both air and nitrogen mix to supply the leaking WCCPPS zone header until the air receiver and nitrogen accumulators are depleted.

Containment penetration and liner weld channels are grouped into four independent zones to simplify the process of locating leaks during operation. Each such zone is served by its own air receiver. In the event that all normal and backup air supplies are lost, each of the four pressurization system zones continues to be supplied with air from its respective air receiver. Each of the air receivers (see Table 6.6-2), is sized to supply air to its pressurized zone for a period of at least one hour, based on a leakage rate of 0.2% of the containment free volume per day from the affected zone (0.1% leakage into the containment and 0.1% leakage to the environment)

If the receivers become exhausted before normal and backup air supplies can be restored, nitrogen from the bank of pressurized cylinders will be supplied to the affected zones. Together the air receivers and nitrogen bank are sized to provide a 24 hour supply of gas to the system, again based on a total leakage rate from the pressurization system of 0.2% of the containment free volume in 24 hours. There are three nitrogen cylinders in the bank each 24" OD by 20' 6½" long. The nitrogen supply will also automatically assume the pressurization gas load in the event that an air receiver fails.

A pressure relief valve set at 175 psig (sized for 1250 scfm at 10% accumulation) protects the system from failure of the pressure reducing valve in the line to each zone from the bank of nitrogen cylinder. Each zone of piping is also protected by a relief valve designed to open at 82 psig. Pressure control valves, isolation valves and check valves are located outside of the containment for ease of inspection and maintenance. Failure of any of these components does not lead to loss of pressure in the system since backup systems automatically augment the normal air supply.

The line to each of the four pressurized zones is equipped with a critical pressure drop orifice (installed in the pressure control valve body) to assure that air consumption will be within the capacity of the system. High air consumption in one zone cannot affect the operation of the other zones under any circumstances.

Means for assuring that the weld channels and penetrations are pressurized is provided by flow-through test lines, connected to the pressurized weld channel zones and penetrations at points as far away from the supply points as possible. Pressurization of the zone is verified by closing off the air supply line and opening the flow-through test line valve to observe the escape of the pressurizing medium. Containment penetration and WCCPPS atmosphere may be sampled by opening the flow through test valves.

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Pressure Indication

In order to ensure that the station operators are aware at all times that all penetrations and liner weld seam channels are pressurized, the following instrumentation is provided:

- 1) The following pressurized zones are equipped with local pressure gages, mounted outside the containment for ready accessibility and available for regular reading. The accuracy of these gages is within 2% of the full scale reading.
 - a) Each piping penetration, except piping penetration 0'0'
 - b) Each electrical penetration
 - c) The spaces between the two isolation (butterfly) valves in the purge supply and exhaust ducts
 - d) The two spaces between the three isolation (butterfly) valves in the containment pressure relief line
 - e) The double-gasketed space on the outside hatch of each of the two personnel air locks
 - f) The sump drain line valve enclosure
 - g) Deleted
- 2) The pressurized zones located entirely inside the containment, and those zones located in inaccessible areas, are equipped to actuate pressure switches to provide remote low pressure alarms and identification lights in the control room. Examples of the zones so equipped are:
 - a) Each liner seam weld channel that remains connected to the Weld Channel Pressurization System
 - b) The double-gasketed space on each inside hatch of the personnel air locks
 - c) The double-gasketed space on the equipment door flange
 - d) The pressurized zones in the spent fuel transfer lube
 - e) Shroud rings over penetration to containment liner weld-piping, and electrical penetrations

The actuating pressure for each pressure switch is set just above incident pressure and just below the nitrogen supply regulator setting.

Personnel Air Lock Interlock

Continuous pressurization of air-lock door double-gasketed barriers, and the protection of the pressurization header against air loss are assured by a set of interlocks. One interlock on each air-lock door prevents opening of the door until the pressurization line is isolated and pressure in the double-gasketed closure is relieved to atmosphere. This prevents excessive leakage from the pressurization system. The pressurization line to this zone is also equipped with a restricting orifice to assure that air consumption, even upon failure of the interlock, will be within the capacity of the pressurization system, and will not result in a loss of pressure in other zones connected to the same pressurization header. Another set of interlocks prevents opening of one air lock door until the double-gasketed zone on the other door is re-pressurized.

Containment Purge Line Interlock

The containment ventilation purge penetration butterfly valves are also interlocked to prevent the opening of either valve until the pressurization line to the space between the valves has been isolated. Isolation of the pressurization line to each purge duct pressurized zone can be accomplished remotely from the Control Room. Alarm lights, prominently displayed on a panel

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indicating the isolation status of the containment, remain lit identifying an open purge duct isolation valve or a low pressurization zone pressure. Restricting orifices are installed on each pressurization line to the ventilation purge ducts to assure that air consumption, even on failure of an interlock, will not result in loss of pressure to the other zones connected to the same pressurization header.

The containment pressure relief line isolation valves (three butterfly valves in series), and the two pressurized spaces formed between these valves, are provided with similar interlocking to prevent the opening of any of the butterfly valves until the adjacent intervalve space has been depressurized. The pressurization lines to these spaces are also equipped with flow restricting orifices, and alarm lights in the containment identify open valves or low intervalve space pressure.

Containment Inleakage

With a continuous inleakage to the Containment from the penetration and liner weld joint channel pressurization system of 0.1% of the containment volume per day, the calculated time for the containment pressure to rise by 1 psi is approximately 14 days, and therefore is not considered to be an operating or safety problem. From the standpoint of allowable pressure, a much greater inleakage would be permitted. With the ability to limit the activity of the air in the Containment during normal operation through the use of the two containment auxiliary charcoal filter units, each complete with roughing filters, HEPA filters, and charcoal filters (see Chapter 5).

Containment overpressure can be relieved as required through the pressure relief duct and exhaust fan, passing up the discharge duct, along with the exhaust air from the Primary Auxiliary Building. A narrow range pressure indicator is provided on the local fan panel to assist in operation of the building pressure relief fan. The range is -5 to +5 psig.

Components

All associated components, piping, and structures, of the Containment Penetration and Weld Channel Pressurization System are designed to Class I seismic criteria.

The piping and valves for the system are designed in accordance with the ANSI Code for Pressure Piping (Power Piping Systems), B31.1.

For a description of the instrument and control air compressors and the plant air compressor, see Section 9.6.

The three nitrogen cylinders provided meet the requirements of Section VIII (Unfired Pressure Vessels) of the ASME Boiler and Pressure Vessel Code, for 2200 psig maximum pressure, and contain a total of 22,000 scf of nitrogen.

6.6.3 Design Evaluation

The employment of this system following a Loss-of-Coolant Accident, while not considered in the analysis of the consequences of an accident, provides an additional means for ensuring that leakage is minimized, if not altogether eliminated. No detrimental effect of any other safety features system will be felt should the pressurization system fail to operate.

System Response

WCCPPS is not single failure proof, as the WCCPPS zones are not redundant. A nitrogen or air regulator failure may render a zone, or in some instances the entire system, incapable of performing its design function (i.e., pressurize the space between containment isolation valves, weld channels and containment penetrations at a pressure greater than the containment accident pressure profile for 24 hours post accident).

This can be tolerated for the following reasons. While one of the design basis functions for WCCPPS is to minimize offsite releases, WCCPPS is not needed to meet the requirements of 10 CFR 100. In addition, no other safeguards systems are dependent on the operation of WCCPPS. As such, a WCCPPS failure would not create undue risk to the health and safety of the public.

To account for active failures, two parallel WCCPPS supply valves are provided for certain containment isolation lines that are normally or intermittently open during operation. These containment isolation valves automatically close on a containment isolation signal. Opening of one of the two WCCPPS supply valves in each line is sufficient to accomplish pressurization gas injection upon closing of the containment isolation valves.

Shared Functions Evaluation

Table 6.6-4 is an evaluation of the main components discussed previously and a brief description of how each component functions during normal operation and during an accident.

6.6.4 Minimum Operating Conditions

The Technical Specifications establish limiting conditions regarding the operability of the system when the plant is above MODE 5.

6.6.5 Inspections and Tests

Inspections

The system components located outside the Containment can be visually inspected at any time. Components inside the Containment can be inspected during shutdown. All pressurized zones have provisions for either local pressure indication outside the Containment or remote low pressure alarms in the Control Room.

Testing

Since the system is in operation continuously during all reactor operations to maintain the penetrations and liner weld channels pressurized above containment design pressure, no special testing of system operation or components is necessary.

Should one zone indicate a leak during operation, the specific penetration or weld channel containing the leak can be identified by isolating the individual air supply line to each component in the zone and injecting leak test gas through a capped tube connection installed in each line.

Total leakage from penetrations and weld channels is measured by summing the recorded flows in each of the four pressurization zones. A leak would be expected to build up slowly and would

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therefore be noted before design leakage limits are exceeded. Therefore, remedial action can be taken before the limit is reached. For those liner welds that are no longer continuously pressurized, a leak would not be identified during plant operation. The integrity of these welds is verified by integrated leak rate testing.

In order to provide facility for testing the larger penetrations, branch pressurizing lines are provided from one of the zones to:

- 1) The double-gasketed space on each hatch of the Personnel Air Lock.
- 2) The double-gasketed space at the Equipment Hatch flange.
- 3) The pressurized zones in the spent fuel transfer tube.
- 4) The spaces between the two butterfly valves in the purge supply exhaust ducts.
- 5) The two spaces between the three butterfly valves in the containment pressure relief line.
- 6) The spaces between double containment isolation valves in the steam jet air ejector return line to containment and in the containment radiation monitor inlet and outlet lines.
- 7) The spaces between the isolation valves for the VC Hydrogen Analyzer lines.

The makeup air flow to the penetrations and liner weld joint channels during normal operation is recognized to be only an indication of the potential leakage from the Containment. However, it does indicate the leakage from the pressurization system, and the degree of accuracy will be increased when correlated with the results of the full scale containment leak rate tests. The criteria for selection of operating limits for air consumption of the pressurization system are based upon the integrated containment leak rate test acceptance criterion and upon the maintenance of suitable reserve air supplies in the static reserves consisting of the air receivers and nitrogen cylinders. A summary of these operating limits is included in the Technical Specifications.

A flow sensing device is located in each of the headers supplying makeup air to the four pressurization zones. Signal output from each of the four flow sensors is applied to an integrating recorder located in the Control Room. Output from all sensors is also applied to a summing amplifier which drives a total flow recorder. High flow alarms are also derived in the recording channel, to alert the operator in the Control Room. The flow measurement range is 0-15 SCFM with an accuracy of +/- 1% of full scale. Since a flow of 0.2% of the containment volume per day at 47 psig is approximately 3.6 Ft³/minute, the sensitivity of the flow meters is well within the maximum leakage of the pressurization system.

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TABLE 6.6-1

CONTAINMENT PENETRATION AND WELD CHANNEL PRESSURIZATION SYSTEM
EMERGENCY NITROGEN STORAGE

Number	3
Volume, (each) ft ³	7333*
Material	ASTM A-372-CL IV
Design pressure, psig	2450
Design temperature, F	200
Operating pressure, psig	2200
Operating temperature, F	100
Code	ASME UPV (SECT. VIII)

*NOTE: Each nitrogen cylinder has a volume of 51 ft³ and can store 7333 standard cubic feet of dry nitrogen at 2200 psig at 70° F.

TABLE 6.6-2

CONTAINMENT PENETRATION AND WELD CHANNEL PRESSURIZATION SYSTEM AIR
RECEIVERS

Number	4
Volume, (each) ft ³	360
Material	ASTM A-285-C
Design pressure, psig	140
Design temperature, F	200
Operating pressure, psig	100
Operating temperature, F	100
Code	ASME UPV (SECT. VIII)

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TABLE 6.6-3

SINGLE FAILURE ANALYSIS – CONTAINMENT
PENETRATION AND WELD CHANNEL PRESSURIZATION SYSTEM

<u>Component</u>	<u>Malfunction</u>	<u>Comments</u>
Instrument Air Control Air Compressor	Fails to maintain pressure	One of two instrument and control air compressors required to operate.
Pressure Reducing Valve for each zone	Fails to maintain pressure	On valve failure, flow is limited to acceptable value (75 scfm) by the critical pressure drop orifice. Under low flow conditions, over- pressurization of system downstream of valve is prevented by a relief valve.

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TABLE 6.6-4

SHARED FUNCTIONS EVALUATION

Component	Normal Operating Function	Normal Operating Arrangement	Accident Function	Accident Arrangement
Instrument and Control Air Compressors (2)	Supply air to plant instrument and controls and to penetrations and weld channels	2 air compressors in operation	Supply air to penetrations and weld channels	1 air compressor in operation
Plant Air Compressor (1)	Supply air to station air headers	1 air compressor in operation	"	1 air compressor in operation
N ₂ Cylinders (3)	Backup source of N ₂ to maintain penetration and weld channel pressure	Lined up to Penetration and Weld Channel Pressurization System	Backup source of N ₂ to maintain penetration and weld channel pressure	Lined up to Penetration and Weld Channel Pressurization System
Air Receivers (1) and Dryers (3)	Primary source of air for penetrations and weld channels	Lined up to Penetration and Weld Channel Pressurization System	Primary source of air for penetrations and weld channels	Lined up to Penetration and Weld Channel Pressurization System

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6.7 LEAKAGE DETECTION AND PROVISIONS FOR THE PRIMARY AND AUXILIARY COOLANT LOOPS

6.7.1 Leakage Detection Systems

The leakage detection systems reveal the presence of significant leakage from the primary and auxiliary coolant loops.

6.7.1.1 Design Bases

The General Design Criteria presented and discussed in this section are those which were in effect at the time when Indian Point 3 was designed and constructed. These general design criteria, which formed the bases for the Indian Point 3 design, were published by the Atomic Energy Commission in the Federal Register of July 11, 1967, and subsequently made a part of 10 CFR 50.

The Authority completed a study of compliance with 10 CFR Parts 20 and 50 in accordance with some of the provisions of the Commission's Confirmatory Order of February 11, 1980. The detailed results of the evaluation of the compliance of Indian Point 3 with the General Design Criteria presently established by the Nuclear Regulatory Commission (NRC) in 10 CFR 50 Appendix A, were submitted to NRC on August 11, 1980, and approved by the Commission on January 19, 1982. These results are presented in Section 1.3. The NRC has concluded that the current IP3 leakage detection system capability is adequate to continue to support the technical bases cited in the NRC's March 10, 1986, SE approving Leak Before Break (LBB) for the IP3 Primary Coolant Loop piping. This position was further clarified in the IP3 Supplement to Safety Evaluation re: Leakage Detection Systems (TAC No. MB3328, dated 01/30/02).

Monitoring Reactor Coolant Leakage

Criterion: Means shall be provided to detect significant uncontrolled leakage from the reactor coolant pressure boundary. (GDC 16 of 7/11/67)

Positive indications in the Control Room of leakage of coolant from the Reactor Coolant System to the Containment are provided by equipment which permits continuous monitoring of containment air activity and humidity, and of runoff from the condensate collecting pans under the cooling coils of the containment air recirculation units. This equipment provides indication of normal background which is indicative of a basic level of leakage from primary systems and components. Any increase in the observed parameters is an indication of change within the Containment, and the equipment provided is capable of monitoring this change. The basic design criterion is the detection of deviations from normal containment environmental conditions including air particulate activity, radiogas activity, humidity, condensate runoff. The containment sump system with incorporation of a CR alarm (VC Sump Pump running) or operator actions to increase monitoring of the processing system (i.e. sump flow monitor once every 4 hours), provides the capability of detecting a 1 gpm leak within four hours.

These methods are designed to monitor leakage into the Containment atmosphere and as such do not distinguish between identified and unidentified leaks.

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Monitoring Radioactivity Releases

Criterion: Means shall be provided for monitoring the containment atmosphere and the facility effluent discharge paths for radioactivity released from normal operations, from anticipated transients, and from accident conditions.

An environmental monitoring program shall be maintained to confirm that radioactivity releases to the environs of the plant have not been excessive. (GDC 17 of 7/11/67)

The containment atmosphere, the plant ventilation exhaust (including exhausts from the Fuel Storage Building, Primary Auxiliary Building, and Waste Holdup Tank Pit), the containment fan-coolers service water discharge, the component cooling loop liquid, the liquid phase of the secondary side of the steam generator, and the condenser air ejector exhaust are monitored for radioactivity concentration during normal operation, anticipated transients and accident conditions.

Principles of Design

The principles for design of the leakage detection systems can be summarized as follows:

- 1) Increased leakage could occur as the result of failure of pump seals, valve packing glands, flange gaskets or instrument connections. The maximum single leakage rate calculated for these types of failures is 50 gpm which would be the anticipated flow rate of water through the pump seal if the entire seal were wiped out and the area between the shaft and housing were completely open.

The original design of the RHR and HHSI Pump seals incorporated a disaster bushing that would limit the flow to 50 GPM if the seal faces were severely damaged. For GL 2004-02 compliance, an analysis determined the wear of these disaster bushings if debris laden fluid passed through a failed seal. The potentially abrasive nature of the fluid can wear non-metallic disaster bushings over time, whereby the flow out past the damaged seal could eventually exceed 50 GPM. However, this effect is not immediate and as before, actions would be taken to isolate the pump before the 50 GPM flow rate is reached. The Chesterton seal, an alternate type to the original seal, was tested to demonstrate that severely damaged seal faces would result in a flow rate of less than 50 GPM past the seal. Both the original seal designs and later Chesterton model seals are acceptable and may be in use in the HHSI and RHR pumps.

- 2) The leakage detection systems shall not produce spurious annunciation from normal expected leakage rates but shall reliably annunciate increasing leakage.
- 3) Increasing leakage rate shall be annunciated in the control room. An exception is for the VC sump where compensatory operator action could be used if the CR alarm is unavailable as long as the sensitivity of the credited RCS leak detection system is maintained (i.e., 1 GPM within 4 hours). Operator action will be required to isolate the leak in the leaking system.

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For Class I systems located outside the containment, leakage is determined by one or more of the following methods:

- 1) For systems containing radioactive fluids, leakage to the atmosphere would result in an increase in local atmospheric activity levels and would be detected by either the plant vent monitor or by one of the area radiation monitors. Similarly, leakage to other systems which do not normally contain radioactive fluids would result in an increase in the activity level in that system.
- 2) For closed systems, leakage would result in a reduction in fluid inventory.
- 3) All leakage would collect in specific areas of the building for subsequent handling by the building drainage systems, e.g., leakage in the vicinity of the residual heat removal pumps would collect in the sumps provided, and would result in operation, or increased operation, of the associated sump pumps.

Details of how these methods are utilized to detect leakage from Class I systems other than the Reactor Coolant System are given in the following sections and summarized in Table 6.7-1.

The Authority has established a program to identify and reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident (NUREG – 0578). Leak test results for these systems are presented in Table 6.7-2.

6.7.1.2 Systems Design and Operation

Various methods are used to detect leakage from either the primary loop or the auxiliary loops. Although described to some extent under each system description, all methods are included here for completeness.

Reactor Coolant System

During normal operation and anticipated reactor transients, the following methods are employed to detect leakage from the Reactor Coolant System:

Containment Air Particulate Monitor (R-11)

This channel takes continuous air samples from the containment atmosphere and measures the air particulate beta radioactivity. The samples, drawn outside the containment, are in a closed, sealed system and are monitored by a scintillation counter – filter paper detector assembly. The filter paper collects all particulate matter greater than 1 micron in size on its constantly moving surface, which is viewed by a photomultiplier plastic scintillator combination. After passing through the gas monitor, the samples are returned to the containment.

The filter paper has a 25-day minimum supply at normal speed. The filter paper mechanism and electromagnetic assembly which controls the filter paper movement, is provided as an integral part of the detector unit.

The detector assembly is in a completely closed housing. The detector output is amplified by a preamplifier and transmitted to a microprocessor which converts the detector output to digital and analog signals for display, generates alarms and communicates with the Radiation Monitoring System cabinet in the Control Room. Lead shielding is provided for the radiogas detector to reduce the background radiation level to where it does not interfere with the detector's sensitivity.

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The activity is indicated on digital displays and recorded by a stripchart recorder. High-activity alarm indication is displayed on the control room annunciator, and the radiation monitor microprocessor. Local and control room alarms provide operational status of supporting equipment such as pumps, motors and flow and pressure controllers.

The containment air particulate monitor is the most sensitive instrument of those available for detection of reactor coolant leakage into the Containment. The measuring range of this monitor is given in Section 11.2.

The sensitivity of the air particulate monitor to an increase in reactor coolant leak rate is dependent upon the magnitude of the normal baseline leakage into the Containment. The sensitivity is greatest where baseline leakage is low as has been demonstrated by experience. (See Appendix 6B.) Where containment air particulate activity is below the threshold of detectability, operation of the monitor with stationary filter paper would increase leak sensitivity to a few cubic centimeters per minute.

Using a source term based on six months after start up through the end of the operating cycle with little fuel defect, varying ambient background level, the least conservative detection capability for R-11 is not expected to exceed a value of 2 gpm within 4 hours. Varying detector background, RCS activity level and failed fuel conditions are contributors to changes in R-11 detection capability.

Containment Radioactive Gas Monitor (R-12)

This channel measures the gaseous beta radioactivity in the Containment by taking the continuous air samples from the containment atmosphere, after they pass through the air particulate monitors, and drawing the samples through a closed, sealed system to a gas monitor assembly.

Each sample is constantly mixed in the fixed, shielded volume, where it is viewed by a plastic scintillator coupled to a heated photomultiplier. The samples are then returned to the Containment.

The detector is in a completely enclosed housing. Lead shielding is provided to reduce the background radiation level to a point where it does not interfere with the detector's sensitivity. A preamplifier is mounted at the detector skid.

The detector outputs are transmitted to a microprocessor which converts the detector output to digital and analog signals for display, and communicates with the Radiation Monitoring System cabinet in the Control Room. The activity is indicated by a digital display and recorded by a stripchart recorder. High-activity alarm indications are displayed on the control room annunciator and the radiation monitoring microprocessor. Local and control room alarms annunciate the supporting equipments' operational status.

The containment radioactive gas monitor is inherently less sensitive. Varying detector background, RCS activity level and failed fuel conditions are contributors to changes in R-12 detection capability. As the detector background increases, either the time to detect a 1gpm leak goes higher or the detectable RCS leak rate is greater than 1 gpm within the specified time frame. The measuring range of this monitor is given in Section 11.2.

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R 11/12 and its associated equipment will provide indication of normal background which is indicative of a basic level of leakage from primary systems and components. Any increase in the observed parameters is an indication of the change within the Containment and the equipment provided is capable of monitoring the change.

The NRC has concluded that the current IP3 leakage detection system capability is adequate to continue to support the technical bases cited in the NRC's March 10, 1986, SE approving Leak Before Break (LBB) for the IP3 Primary Coolant Loop piping. This position was further clarified in the IP3 Supplement to Safety Evaluation re: Leakage Detection Systems (TAC No. MB3328, dated 01/30/02).

Humidity Detector

The humidity detection instrumentation offers another means of detection of leakage into the Containment. Although this instrumentation has not nearly the sensitivity of the air particulate monitor, it has the characteristics of being sensitive to vapor originating from all sources within the Containment, including the reactor coolant and steam and feedwater systems. Plots of containment air dew point variations above a base-line maximum established by the cooling water temperature to the air coolers should be sensitive to incremental increases of water leakage to the containment atmosphere on the order of 0.25 gpm per F degree of dewpoint temperature increase.

The sensitivity of this method depends on cooling water temperature, containment air temperature variation and containment air recirculation rate.

Condensate Measuring System

This method of leak detection is based on the principle that under equilibrium conditions, the condensate flow draining from the cooling coils of the containment air handling units will equal the amount of water (and/or steam) evaporated from the leaking system. Reasonably accurate measurement of leakage from the Reactor Coolant System by this method is possible because containment air temperature and humidity promote complete evaporation of any leakage from hot systems. The ventilation system is designed to promote good mixing within the containment. During normal operation the containment air conditions will be maintained near 120° F DB and 92° F WB (approximately 36% Relative Humidity) by the fan coolers.

When the water from a leaking system evaporates into this atmosphere, the humidity of the fan cooler intake air will begin to rise. The resulting increase in the condensate drainage rate is given by the equation:

$$D = L [1 - \exp(-Q / Vt)]$$

Where:

- D = Change in drainage rate after initiation of increased leakage rate (gpm)
- L = Change in evaporated leakage rate (gpm)
- Q = Containment ventilation rate (CFM)
- V = Containment free volume (ft³)
- T = Time after start of leak (min.)

Therefore, if four fan cooler units are operating (Q = 280,000 CFM), the condensation rate would be within 5% of a new equilibrium value in approximately 200 minutes after the start of the leak. Detection of the increasing condensation rate, however, would be possible within 5 to 10 minutes.

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The condensate measuring device consists essentially of a vertical 6 inch diameter standpipe with a weir cut into the upper portion of the pipe to serve as an overflow. Each fan cooler is provided with a standpipe which is installed in the drain line from the fan cooler unit. A differential pressure transmitter near the bottom of the standpipe is used to measure the water level. Each unit can be drained by a remote operated valve.

A wide range of flow rates can be measured with this device. Flows less than 1 gpm are measured by draining the standpipe and observing the water level rise as a function of time. Condensate flows from 1 gpm to 30 gpm can be measured by observing the height of the water level above the crest notch of the weir. This water head can be converted to a proportional flow rate by means of a calibration curve. A high level alarm, set above the established normal (baseline) flow, is provided for each unit to warn the operator when operating limits are approached.

All indicators, alarms, and controls are located in the Control Room. This method provides a backup to the radiation monitoring methods.

Component Cooling Liquid Monitors (R-17A and R-17B)

These channels continuously monitor the component cooling loop of the Auxiliary Coolant System for activity indicative of a leak of reactor coolant from either the Reactor Coolant System, the recirculation loop, or the residual heat removal loop of the Auxiliary Coolant System. Each scintillation counter is located in an in-line well downstream of the component cooling heat exchangers. The detector assembly output is amplified by a preamplifier and transmitted to the Radiation Monitoring System cabinets in the Control Room. The activity is indicated on a meter and recorded. High activity alarm indications are displayed on the control board annunciator in addition to the Radiation Monitoring System cabinets.

The measuring range of this monitor is given in Section 11.2

Condenser Air Ejector Gas Monitor (R-15)

The channel monitors the discharge from the air ejector exhaust header of the condensers for gaseous radiation, which is indicative of a primary to secondary system leak. The gas discharge is routed to the turbine roof vent. In order to quantify the amount of radiation release from the condensers into the atmosphere, flow measuring instrumentation is installed into the same line with an output to the Plant Computer. On high radiation level alarm, this gas discharge is diverted to the containment.

The detector output is transmitted to a microprocessor which converts the detector output to digital and analog outputs for display, generates alarms and communicates with the Radiation Monitoring System cabinet in the Control Room. The activity is indicated by a digital display and recorded by a stripchart recorder. High activity alarm indications are displayed on the control room annunciator and the radiation monitoring microprocessor.

A gamma sensitive Sodium Iodide (NaI) crystal scintillator/ photomultiplier tube is used to monitor the gaseous radiation level. The radiation monitor consists of a 3" pipe section in series with the steam jet air ejector exhaust line, a thin-walled sealed well (perpendicular to and penetrating the 3" pipe) which houses the NaI/PM assembly, and ample lead shielding to reduce background radiation interference to an acceptable level.

Steam Generator Liquid Sample Monitor (R-19)

This channel monitors the liquid phase of the secondary side of the steam generator for radiation, which would indicate a primary-to-secondary system leak, providing backup information to that of the condenser air ejector gas monitor. Samples from the bottom of each of the four steam generators are mixed to a common header and the common sample is continuously monitored by one of two separate scintillation detectors. Upon indication of a high radiation level, each steam generator is individually sampled in order to determine the source. This sampling sequence is achieved by manually selecting the desired unit to be monitored and allotting sufficient time for sample equilibrium to be established (approximately 1 minute).

The sensitivity range of this monitor is given in Table 11.2-7.

A photomultiplier tube – scintillation crystal (NaI combination, mounted in a hermetically sealed unit, is used to monitor liquid effluent activity. Lead shielding is provided to reduce the background level so it does not interfere with the detector's maximum sensitivity. The in-line, fixed – volume container is an integral part of the detector unit.

Personnel can enter the Containment and make a visual inspection for leaks. The location of any leak in the Reactor Coolant System would be determined by the presence of boric acid crystals near the leak. The leaking fluid transfers the boric acid crystals outside the Reactor Coolant System and the evaporation process leaves them behind.

If an accident involving gross leakage from the Reactor Coolant System occurred it could be detected by the following methods:

Pump Activity

During normal operation only one charging pump is operating. If a gross loss of reactor coolant to another closed system occurred which was not detected by the methods previously described, the speed of the charging pump would indicate the leakage.

The leakage from the reactor coolant will cause a decrease in the pressurizer liquid level that is within the sensitivity range of the pressurizer level indicator. The speed of the charging pump will automatically increase to try to maintain the equivalence between the letdown flow and the combined charging line flow and flow across the reactor coolant pump seals. If the pump reaches a high speed limit, an alarm is actuated.

A break in the primary system would result in reactor coolant flowing into the Containment, reactor vessel, and/or recirculation sumps. Leakage to these sumps would be indicated by the frequency of operation of the containment or recirculation pumps. Since the building floor drains preferentially to the containment sump, the operating frequency of the containment sump pumps would be more likely to indicate the leak than the operating frequency of the recirculation or reactor vessel sump pumps.

The containment sump contains two redundant level loops consisting of a transmitter and sensor inside containment, and a recorder, indicator and power supply in the control room.

An alarm will annunciate on the control room supervisory panel if the water level reaches the overflow point in the section of the sump specifically designed to preferentially collect Containment Building leakage.

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The containment sump contains two (2) sump pumps which are actuated by separate pump float switches. These pumps discharge the water to the waste holdup tank outside Containment. Located on this discharge line outside containment is the flow meter and totalizer, which indicates on the Primary Auxiliary Building waste disposal panel the flow from the pumps and a cumulative measure of the amount of water being discharged from containment. The cumulative volume is trended by the control room operators to identify any abnormal increases in leakage on a daily basis. In addition, indicating lights on the waste disposal panel indicate when the containment sump pumps are running. This panel is periodically operated and monitored by the auxiliary operator who reports directly to the control room operator. The containment sump system with incorporation of a CR alarm (VC Sump Pump running) or operator actions to increase monitoring of the processing system (i.e. sump flow monitor once every four hours), provides the capability of detecting a 1 gpm leak within four hours.

The recirculation sump contains two redundant level loops consisting of a transmitter and sensor inside containment, and a recorder, indicator and power supply in the control room. Loss of both of these level indications requires a plant shutdown in accordance with Technical Specifications. The recirculation pumps, which discharge into the Reactor Coolant System, are required for a LOCA and require an immediate plant shutdown in accordance with Technical Specifications if they become inoperable.

The reactor pit contains a level sensor which annunciates two alarms at two separate levels on the control room supervisory panel. These alarms annunciate at different levels when the pit accumulates water prior to the level reaching the in-core instrumentation tubing for the reactor vessel. In addition, the running of the first sump pump illuminates an indicating light on the Control Room supervisory panel. At the present time, during normal plant operation, there is no means to test operability of either the level indication or pumps since this sump is normally maintained dry.

The containment sump contains redundant level indication. Loss of both of these level indications requires a plant shutdown in accordance with the Technical Specifications. Even if both level indications were inoperable, the level probe at the top of the sump would still provide an annunciated alarm.

Liquid Inventory

Gross leaks might be detected by unscheduled increases in the amount of reactor coolant makeup water which is required to maintain the normal level in the pressurizer.

A large tube side to shell side leak in the non-regenerative (letdown) heat exchanger would result in reactor coolant flowing into the component cooling water and a rise in the liquid level in the component cooling water surge tank. The operator would be alerted by a high water alarm for the surge tank and high radiation and temperature alarms actuated by monitors at the component cooling water pump suction header.

A high level alarm for the component cooling water surge tank and high radiation and temperature alarms actuated by monitors at the component cooling pump suction header could also indicate a thermal barrier cooler coil rupture in a reactor coolant pump. However, in addition to these alarms, high temperature and high flow on the component cooling outlet line from the pump would activate alarms.

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Leakage might also be indicated by a rise in the normal containment and/or recirculation sump levels. High level in either of these sumps is indicated in the Control Room. Since the building floor drains preferentially to the containment sump, the containment sump level transmitter would most likely be actuated prior to the level transmitter in the recirculation sump.

The maximum leak rate from an unidentified source that will be permitted during normal operation is 1 gpm.

Leakage directly into the Containment indicates the possibility of a breach in the coolant envelope. The limitation of 1 gpm for a source of leakage not identified is sufficiently above the minimum detectable leakage rate to provide a reliable indication of leakage. The 1 gpm limit is well below the capacity of one coolant charging pump (98 gpm).

The relationship between leak rate and crack size has been studied to detail in WCAP-7503(1), Revision 1, February 1972. This report includes the following information:

- 1) The length of a through-wall crack that would leak at the rate of the proposed limit, as a function of wall thickness.
- 2) The ratio of that length to the length of a critical through-wall crack, based on the application of the principles of fracture mechanics.
- 3) The mathematical model and data used in such analyses.

Leak rate detection is not relied upon for assuring the integrity of the primary system pressure boundary during operation. The conservative approach which is utilized in the design and fabrication of the components which constitute the primary system pressure boundary together with the operating restrictions which are imposed for system heatup and cooldown give adequate assurance that the integrity of the primary system pressure boundary is maintained throughout plant life. The periodic examination of the primary pressure boundary via the in-service inspection program (specified in the Technical Specifications) will physically demonstrate that the operating environment will have no deleterious effect on the primary pressure boundary integrity.

The maximum unidentified leak rate of 1 gpm which is permitted during normal operation is well within the sensitivity of the leak detection systems incorporated within the containment, and it reflects good operating practice based on operating experience gained at other PWR plants. Detection of leakage from the primary system directs the operator's attention to potential sources of leakage, such as valves, and permits timely evaluation to ensure that any associated activity release does not constitute a public hazard, that the reactor coolant inventory is not significantly affected and that the leakage is well within the capability of the containment drainage system.

Residual Heat Removal Loop

The residual heat removal loop removes residual and sensible heat from the core and reduces the temperature of the Reactor Coolant System during the second phase of plant shutdown.

During normal operation, the containment air particulate and radioactive gas monitors, the humidity detector and the condensate measuring system provide means for detecting leakage from the section of the residual heat removal loop inside the Reactor Containment. These systems have been described previously in this section (see description of leak detection from the Reactor Coolant System). Leakage from the residual heat removal loop into the component cooling water loop during normal operation would be detected outside the Containment by the

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component cooling loop radiation monitor (see analysis of detection of leakage from the Reactor Coolant System in this section).

The physical layout of the two residual heat removal pumps is within separate shielded and isolated rooms within the Primary Auxiliary Building. Detection of a leaking residual heat removal pump is thus possible by means of the radiation monitors provided on the Primary Auxiliary Building plant ventilation system which exhausts these pump compartments.

Alarms in the control room will alert the operator when the activity exceeds a preset level. Small leaks to the environment could be detected with these systems within a short time after they occurred.

When the plant is shutdown personnel can enter the Containment to check visually for leaks. Detection of the location of significant leaks would be aided by the presence of boric acid crystals near the leak.

In case of an accident which involves gross leakage from the part of the residual heat removal loop inside the containment, this leakage would be indicated by a rise in the containment and/or recirculation sump levels. Both these sumps have redundant level indication in the control room. As the building floor drains preferentially to the containment sump, the level transmitter in this sump would most likely be actuated first.

Should a large tube side to shell side leak develop in a residual heat exchanger or the seal heat exchanger of a residual heat removal pump break, the water level in the component cooling surge tank would rise and the operator would be alerted by a high water alarm. Radiation and temperature monitors at the component cooling water pump header will also signal an alarm.

Leakage from both of the residual heat removal pumps is drained to a common sump equipped with a sump pump. The sump pump starts automatically and transfers this leakage to the waste holdup tank; indication and alarm for high level in this tank is made on the waste disposal panel. This would provide indication of gross leakage (i.e., a seal failure from a residual heat removal pump).

Recirculation Loop

If a break occurs in the Reactor Coolant System, the recirculation loop provides long-term protection by recirculating spilled reactor coolant and injected refueling water.

Leakage from the residual heat exchanger would be detected by a radiation monitor (discussed in the section on leak detection from the Reactor Coolant System) at the component cooling water pump discharge header.

A rise in the liquid level in the component cooling surge tank would result if a large tube side to shell side leak developed in a residual heat exchanger. The operator would be alerted by a high level alarm in the component cooling water surge tank and a high radiation and temperature alarm actuated by monitors at the component cooling water pump header.

If the external recirculation loop is used, leakage from the section outside the Containment would be directed by floor drains to the auxiliary building sump and / or sump tank. From here, it is automatically transferred by pumps to the waste holdup tank. Indication and alarm for high level is made on the waste disposal panel. This would serve to alert the operator of the leakage.

Component Cooling Loop

Leakage from the component cooling loop inside the Reactor Containment could be detected by the humidity detector and/or the condensate measuring system (see section on Reactor Coolant System leak detection for a description of these systems).

Visual inspection inside the Containment is possible.

Gross leakage from the component cooling loop would be indicated inside the containment by a rise in the liquid level of the containment and/or recirculation sumps. Both of these sumps have redundant level indication in the Control Room. As the building floor drains preferentially to the containment sump, the level transmitter in the sump would be more likely to signal the occurrence of leakage.

If the leakage is from a part of the component cooling loop outside the Containment, it would be directed by floor drains to the auxiliary building sump and/or sump tank. The auxiliary building sump pumps and/or sump tank pumps then automatically transfers the leakage to the waste holdup tank. Indication and alarm for high level is made on the waste disposal panel. This would serve as a means of leak detection for this part of the system.

Leakage of Component Cooling Water into the Service Water System through the Component Cooling Water Heat Exchangers can be detected by a radiation monitor (R-23) which monitors the Service Water return line from the CCW Heat Exchangers. A high radiation alarm is annunciated in the Control Room.

Service Water System

During a Loss-of-Coolant Accident the containment fan coolers service water monitors check the containment fan service water discharge line for radiation indicative of a leak from the containment atmosphere into the service water. A small bypass flow from each of the heat exchangers is mixed in a common header and monitored by redundant NaI scintillation detectors. Upon indication of a high radiation level, each heat exchanger is individually sampled to determine which unit is leaking. This sampling sequence is achieved by manually selecting the desired unit to be monitored and allotting sufficient time for sample equilibrium to be established (approximately 1 minute). This method of fan cooler unit (FCU) or FCU motor cooler leak detection and isolation may be performed up until the entry into external recirculation. This is sufficient time to detect and isolate the leak, since the passive failure of the cooling coil is assumed to occur concurrently with the LOCA.

The measuring range of these monitors is given in Section 11.2.

Gross leakage from the Service Water System due to a faulty cooling coil in the Containment Air Recirculation Cooling and Filtration System can be detected by stopping the fans and continuing the cooling water flow. Any significant cooling water leakage would be seen as flow into a collecting pan.

Leakage from a component in the Service Water System in the Primary Auxiliary Building will be directed by floor drains to the Primary Auxiliary Building sump tank. Pumps will then transfer this leakage to the waste holdup tank. Indication and alarm for high level is made on the waste disposal panel, and would serve as a means of leak detection.

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Service Water System leaks inside Containment which are directed to the containment sump and/or the recirculation sump are handled and detected in the same manner as Reactor Coolant System leaks.

6.7.1.3 Pre-Operational Testing

Since initial operation was substantially without benefit of the containment air particulate monitor and radioactive gas monitor to indicate leaks, the performance of the humidity detector and the condensate measuring system was verified as follows:

The radiogas monitor, air particulate monitor, and humidity detectors were tested prior to plant installation. After installation, the radiogas and air particulate monitors were checked for operability as part of the system checkout of the Radiation Monitoring System utilizing the build-in check source provided in each detector. Sensitivity of the condensate measuring systems and humidity detectors were verified as part of the Indian Point 2 Test Program. These tests demonstrated system sensitivities.

During the startup test program at Indian Point 2, a reactor coolant leak of known magnitude was simulated inside the containment vessel, and the performance of the humidity detector and condensate measuring system was observed. The leak was simulated by introducing steam into the Containment at a known rate during a period when containment atmospheric conditions were stable and the fan cooler units were operating. The increase in containment atmosphere moisture content, as indicated by the humidity detectors, was recorded as a function of time following initiation of the simulated leak. As a check, the same information was determined independently using different instrumentation. Elapsed time until condensation on the fan cooler unit cooling coils began, as indicated by the condensate measuring devices, was recorded and compared with the calculated value based on the initial containment humidity. Steam flow continued, and the performance of the condensate measuring devices in indicating the magnitude of steady cooling coil runoff was observed. As the design of this system was verified in Indian Point 2, it was not necessary to repeat the test on Indian Point 3.

Operability of Technical Specification required radiogas and air particulate monitors is checked periodically in accordance with Technical Specification requirements. Simple comparative checks between the six humidity detectors or between the five condensate measuring systems readily confirm operability of these detection systems.

6.7.2 Leakage Provisions

Provisions are made for the isolation and containment of any leakage.

6.7.2.1 Design Basis

The provisions made for leakage are designed to prevent uncontrolled leaking of reactor coolant or auxiliary cooling water. This is accomplished by (1) isolation of the leak by valves, (2) designing relief valves to accept the maximum flow rate of water from the worst possible leak, (3) supplying redundant equipment which allows a standby component to be placed in operation while the leaking component is repaired and (4) routing the leakage to various sumps and holdup tanks.

6.7.2.2 Design and Operation

Various provisions avert uncontrolled leakage from the primary and auxiliary coolant loops.

The leak detection sensitivity of the radiation monitors during plant operation depends upon the primary coolant activity level and the normal baseline leakage. Reliable indications of coolant leakage above baseline are assured when the coolant activity and baseline leakage result in containment atmospheric activity levels within the sensitivity ranges of the radiation monitors. The sensitivity ranges of these monitors, and examples of their leak detection response times for various design coolant activity levels are given in Section 6.7.1.2.

When the containment atmospheric activity level is below the threshold of detectability of the radiation monitors, a primary coolant leak would be detected by the other redundant leak detection systems that monitor nonradioactive parameters (humidity, condensate runoff, liquid inventory, containment sump system).

6.7.2.3 Reactor Coolant System

When significant leakage from the Reactor Coolant System is detected, action is taken to prevent the release of radioactivity to the atmosphere outside the plant.

If either the containment air particulate activity or the radioactive gas activity exceed preset levels on the containment air particulate and radioactive gas monitors, respectively, the containment purge supply and exhaust duct valves and pressure relief line valves are closed.

On high radiation alarm signaled by the condenser air ejector monitor, the condenser exhaust gases are diverted from the turbine roof vent to the Containment through a blower.

A high radiation alarm actuated by the steam generator liquid sample monitor initiates closure of the isolation valves in the blowdown lines and sample lines.

If a leak should develop from the Reactor Coolant System to the component cooling loop, a high radiation alarm will actuate in the control room. If the leak is large, the component cooling surge tanks will fill and overflow to the waste hold-up tanks in the Primary Auxiliary Building.

A large leak in the Reactor Coolant System pressure boundary, which does not flow into another closed loop, would result in reactor coolant flowing into the containment sump and/or the recirculation sump.

Experience with the detection of primary system leakage into the containment vessel of Indian Point 1 is discussed in Appendix 6B.

Evaluation of Potential Leakage from the Reactor Coolant System

In considering potential leakage from the Reactor Coolant System containing primary coolant at high pressure, four categories should be considered:

- I - Leakage to the reactor coolant drain tank.
- II - Leakage to the pressurizer relief tank.
- III - Leakage to the containment environment.
- IV - Leakage to the interconnecting systems.

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For clarity, each of these paths are discussed in turn.

I – Paths Directed to the Reactor Coolant Drain Tank (RCDT)

The routes directed to the Reactor Coolant Drain Tank may be summarized as follows:

- 1) Reactor Coolant System Loop Drains
- 2) Accumulator Drains
- 3) Auxiliary System Equipment Drains
- 4) Excess Let-down
- 5) Valve Leakoffs
- 6) Reactor Coolant Pumps Seal Leakage
- 7) Reactor Flange Leak-off

Of these paths, (1) through (4) do not present a leakage load on the RCDT during normal operation; leakage from the high pressure systems is not expected because of the use of double isolation valves. Path (5) through (7) merit some discussion.

Valve Leak-offs

Source – there are some twenty-six valves provided with leak-offs in the containment. Of these valves, only two valves in the Reactor Coolant System, one valve in the Chemical and Volume Control System and four valves in the Safety Injection System will normally have their valve stem packing subjected to pressure.

342	First isolation valve in the letdown line is normally fully open.
535 536	Pressurizer relief isolation valves which are normally fully open.
894A 894B 894C 894D	Accumulator isolation valves are normally open. The only leakage would be borated non-radioactive water.

Estimated Leakage – In the original FSAR, total leakage of reactor coolant fluid during normal power operation was conservatively estimated by assuming the use of the valve backseat for valves 342, 535, and 536 shown above as well as for valves 571A, 571B, 571C, and 571D (since removed by the RCS RTD Bypass Manifold Removal modification). Since backseats are capable of limiting leakage to less than 1.0 cc per hour per inch of stem diameter, assuming no credit for valve packing, it was assumed that the valves would leak at this rate. Hence for these original seven valves, a total leakage of 7 cc/hr was assumed. Consistent with industry practice, backseats are not used at IP3. The valve packing is used to minimize stem leakage. Actual RCS leakage is monitored and controlled to Technical Specification limits.

Indication to operator – The operator is alerted to abnormal conditions by an increase of the drain tank water temperature and eventually the change in tank level. Drain tank temperature, pressure, and level are continuously indicated on the “waste disposal/boron recycle” panel in the auxiliary building. High pressure, high temperature, high level and low level are annunciated on the panel. Any alarm on the WDS/BR panel causes annunciation of a single window on the main control board.

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Reactor Coolant Pump Seals

Source – Charging flow is directed to the reactor coolant pumps via a seal-water-injection filter. It enters the pumps at a point between the labyrinth seals and the No. 1 face seal. Here the flow splits and a portion (normally about 5 gpm) enters the Reactor Coolant System via the labyrinth seals and thermal-barrier-cooler cavity. The remainder of the flow (normally about 3 gpm) flows up the pump shaft (cooling the lower bearing) and leaves the pump via the No. 1 seal where its pressure is reduced to about 25-30 psig and its temperature is increased from 130°F to about 136°F. The labyrinth flows (20 gpm total for four reactor coolant pumps) are removed from the system as a portion of the letdown flow. The No. 1 seal discharges (12 gpm total for four reactor coolant pumps) flow to a common manifold and then via a filter through the Seal Water Heat Exchanger (where the temperature is reduced to about 130°F) to the volume control tank.

The leak-off system between the No. 2 and No. 3 seals is considered to be part of the Reactor Coolant System. The leak-off system collects leakage passed by the No. 2 seal, provides a constant backpressure on the No. 2 seal and constant pressure on the No. 3 seal. A standpipe is provided to give a constant backpressure during normal operation. The first outlet from the standpipe is orificed to permit normal No. 2 seal leakage to flow to the reactor coolant drain tank; excessive No. 2 seal leakage will result in a rise in the standpipe level and eventual overflow to the reactor coolant drain tank via a second overflow connection.

Leakage – The normal No. 2 seal flow will be 3 gph per pump. This is the value specified in the Reactor Coolant Pump Equipment Specification.

Indication to Operation – Level instrumentation on the standpipes is provided to alert the operator to abnormal conditions. The standpipe consists of a pipe with an orificed overflow at the mid-point, a normally closed drain (for service) at the bottom, and a free-flowing overflow at the top. Normal No. 2 seal leakage will flow freely out the mid-point overflow. Excessive leakage will “back-up” in the standpipe until it overflows out the top. A level switch in the upper standpipe actuates an annunciator indicating excessive flow. A level switch in the lower standpipe causes annunciation of the opposite condition which could result in undesirable dry operation of the No. 3 seal.

Reactor Vessel Flange Leak-off

Source – The reactor vessel flange and head are sealed by two metallic o-rings. To facilitate leakage detection, a leak-off connection was placed between the two o-rings and a leak-off connection was placed beyond the outer o-ring. Piping and associated valving was provided to direct any leakage to the reactor coolant drain tank.

Leakage – During normal operation, the leakage will be negligible since it was specified in the Reactor Vessel Equipment Specification that there is to be zero leakage past the outer o-ring under normal operating and transient conditions.

Indication to Operator – A temperature detector will indicate leakage by a high temperature alarm. The operator is further alerted by the associated increase in drain tank water temperature and eventually the change in tank level.

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II – Paths Directed to Pressurizer Relief Tank (PRT)

Source – The PRT condenses and cools the discharge from the pressurizer safety and relief valves. Discharge from smaller relief valves located inside the containment is also piped to the relief tank. During normal operation, leakage could possibly occur from either the pressurizer safety valves, pressurizer relief valves or the CVCS letdown station relief valve.

Leakage – During normal operation, the leakage to the pressurizer relief tank is negligible since the valves were designed for essentially zero leakage at the normal system operating pressure, as specified in the respective valve equipment specifications.

Indication to Operator – For each valve, temperature detectors are provided in the discharge piping to alert the operator to possible leakage.

The rate of increase of the water temperature in the pressurizer relief tank and the level change will indicate to the operator the magnitude of the leakage. In the event of excessive leakage into an interconnecting system causing lifting of the local relief valves, the operator would again be alerted to the situation by a rising tank water temperature (see discussion for Category IV below). To further assist the operators in evaluating pressurizer relief tank conditions, there is a pressure recorder which takes pressure fluctuation data from pressurizer relief tank pressure transmitter and plots it in the CCR.

All of the pressurizer power operated relief valves and their associated motor-operated block valves have been provided with an acoustic monitoring system for position indication. Should there be any significant leakage from any of these valves, this system initiates an alarm in the control room. Acoustic monitoring for Relief Valve 455C is non-functional for operating cycle 19. The primary alternate indication of valve position will be the valve's limit switch system. Temperature Element (TE-463), PRT Level (LT-407) or Temperature Element (TE-471) will also be used for PORV (RC-PCV-455C) position indication for operating cycle 19.

III – Releases to the Containment Environment

Source – The main contributors of leakage to the containment environment may be listed as follows:

- 1) Valve stem leakages
- 2) Reactor Coolant Pump No. 3 seal leakage
- 3) Weld leakages
- 4) Flange leakages

Valve Stem Leakage

With exception of the pressurizer spray valves, the modulating valve within the containment are provided with leakoff connections which in turn are piped to the reactor coolant drain tank. Of the remaining valves which serve lines and components containing reactor coolant, only two are not normally fully open or fully closed; i.e., the continuous spray bypass needle valves around the main spray valves. The remaining valves are provided with backseats which are capable of limiting leakage to less than one cubic centimeter per hour per inch of stem diameter assuming no credit for packing in the valve. Normally closed globe valves are installed with recirculation flow under the seat to prevent stem leakage from the more radioactive fluid side of the seat.

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On the basis of these pessimistic assumptions, the leakage from valves was originally estimated to be approximately 50 cc/hr.

- Modulating valves PCV-455A and PCV-455B were originally installed with intermediate packing leak-off lines piped to the RCDT. The original assumption was that this configuration would result in a maximum leakage to the RCDT of 6 cc/hr/valve through the packing. A modification resulted in replacement of the standard packing with a live loaded packing configuration to mitigate the potential of any leakage and capping of the existing leakoff line as no longer required. For conservatism, in the unlikely event of failure of the live-load packing, this assumption as to leakage quantity remains. However, the leakage path would now be to the containment environment in lieu of the RCDT.
- CH-342 was originally supplied with a lantern ring and a leakoff line that was routed to the Reactor Coolant Drain Tank (RCDT) in the event of packing failure. A live load packing configuration has been incorporated in the design of this valve and, consequently, the leakoff line has been retired in place and any potential leak path is to the Containment environment. (Reference NSE 98-3-156 CVCS, Rev. 1)

As a general rule, open valves are not backseated. The plant relies on packing to minimize stem leakage. Actual leakage is monitored and controlled to Technical Specification limits.

Reactor Coolant Pump No. 3 Seal Leakage

A small continuous leakage is anticipated past the No. 3 seal to the containment environment; this fluid will be charging water and was anticipated to be of the order of 100 cc/hr per pump. This is the value specified in the Reactor Coolant Pump Equipment Specification. The No.3 seal leak-off is diverted to the local open drains and is thus released to the containment environment.

Weld Flanges

The welded joints throughout the system were subjected to extensive non-destructive testing; leakage through metal surfaces and welded joints is very unlikely.

Flange Joints

There are a number of flanged joints in the system; all of which will be subjected to leak testing before power operation. Experience has shown that hydrostatic testing is successful in locating leaks in a pressure containing system.

Methods of leak location which can be used during plant shutdown include visual observation for escaping steam or water or for the presence of boric acid crystals near the leak. The boric acid crystals are transported outside the Reactor Coolant System in the leaking fluid and deposited by the evaporation process.

Leakages – The main contributors to leakage to the containment environment are considered to be (1) and (2); experience with operating reactors has shown that following the normal pre-operational testing, leakage from these sources is negligible.

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Conclusion

On the basis of the above, the analysis of the situation indicates a total leak rate to the containment environment of the order 450 cc/hr. For design purposes 50 lb/day (i.e., 1000cc/hr) was assumed.

IV – Leakage to Interconnecting Systems

Each of the interconnecting systems are dealt with in turn.

SYSTEM	DISCUSSION
CVCS	This is a normally operating interconnected system redundancy for isolating purposes if required.
SS	In the event of sample valves failing close or seat, adequate redundancy is provided by containment isolation valves; the piping between the sets of valves is designed for RCS pressure.
RHR Hot Leg	Two isolation valves are provided; in the unlikely event of Connection leakage past the two valves, interconnecting piping is provided to enable pressure relief via the RHR loop relief valve to the pressurizer relief tank.
RHR Cold Leg	In the unlikely event of leakage past two sets of check valves into the RHR loop, pressure relief will take place via the RHR loop relief valves to the pressurizer relief tank.
SIS High Head Pump	In the event of leakage past two sets of check injection lines valves in any high head branch line, pressure relief will take place to the PRT via the relief valve in the SIS test line.
SIS Accumulator	Provisions have been made to check the Connections leak tightness of the leak tightness of the accumulator check valves. The implications of leakage past these valves are discussed in Section 6.2

*NOTE: The configuration of these RHR, SI and Accumulator connections is shown on Plant Drawing 9321-F-27503 [Formerly Figure 6.2-1A] and consists of in series check valves. All of these check valves are categorized as Reactor Coolant System (RCS) Pressure Isolation (PIVs) and are listed in the Table 6.7-3. Periodic testing of these valves for loss leakage is required by Technical Specifications and reduces the probability of an inter-system LOCA (Reference 1). These tests implement the requirements set forth in Reference 3 regarding the testing of SIS check valves and provide the basis for the rescission of Item A.5 of Reference 2.

On the table 6.7-3 pressure isolation valves S1-857A&G, Q&R, S&T, and U&V are presented as matched sets. These pairs of valves are configured in series on the HHSI non-BIT header cold leg branch lines, and deliver flow to the RCS through the Accumulator/RHR injection lines, with each high head branch connecting upstream (low pressure side) of SI-897 valves present the first pressure isolation valve barrier and are leak tested individually. The upstream pairs of 857

valves combine to form a second barrier and are tested as a pair. No credit is taken for leak tight integrity of an individual valve that is tested as a pair. This testing position was approved by the NRC in the Reference 4 supplemental evaluation.

Although leakage of primary fluid to the secondary system via the steam generator primary/secondary boundary is not expected during normal operation because of the conservative design of the U-tubes in the steam generator, any such leakage would result in an increase of activity level in the secondary system and would be detected by the condenser air ejector gas monitor or by the steam generator liquid sample monitor. (See Section 11.2)

6.7.2.4 Residual Heat Removal Loop

High containment air particulate beta and/or gamma activity or high radioactive gas activity will result in an alarm being activated by either the containment air particulate or radioactive gas monitors, respectively. The containment purge supply and exhaust duct valves and pressure relief line valves are closed. This prevents the release of radioactivity to the atmosphere outside the nuclear plant.

If a leak should develop from the residual heat removal loop into the component cooling loop, a high radiation alarm will actuate in the control room. If the leak is large, the component cooling surge tanks will fill and overflow to the waste hold-up tanks in the Primary Auxiliary Building.

Gross leakage from the portion of the residual heat removal loop inside the containment, which does not flow into another closed loop, would result in reactor coolant flowing into the containment sump and/or the recirculation sump. Other leakage provisions for the residual heat removal loop are discussed in Section 9.3.

6.7.2.5 Recirculation Loop

The containment purge supply and exhaust duct valves and pressure relief line valves are closed when either the containment air particulate or the radioactive gas monitors read above a preset level. This prevents radioactivity from escaping to the outside atmosphere.

Leakage from the recirculation loop into the component cooling loop results in a radiation alarm and the automatic closing of the component cooling surge tank vent line to prevent gaseous radioactivity release. If the leak was gross and filled the surge tank before the leaking component could be isolated from the component cooling loop, the relief valve on the surge tank would lift and the effluent would be discharged to the waste holdup tank in the auxiliary building.

Gross leakage from the internal recirculation loop which does not flow into another closed loop will flow into the containment sump and/or the recirculation sump. Gross leakage from the external recirculation loop which does not flow into another closed loop will be drained to the auxiliary building sump and/or sump tank. From there it is pumped to the waste holdup tank.

6.7.2.6 Component Cooling Loop

Gross leakage from the section of the component cooling loop inside the containment which does not flow into another closed loop will flow into the containment sump and/or the recirculation sump and/or sump tank. Outside the containment, major leakage would be drained to the primary auxiliary building sump. From there it is pumped to the waste holdup tank.

Other provisions made for leakage from the component cooling loop are discussed in Section 9.3

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6.7.2.7 Service Water System

Gross leakage from the service water system in the Primary Auxiliary Building will be directed by floor drains to the primary auxiliary sump tank, located outside containment. Pumps will then transfer this leakage to the waste holdup tank. A service water leak through the containment fan cooler units could result in containment flooding. The sump water level monitors would detect this flooding. The containment fan cooler condensate drains from the cooling coils and/or cooling coil leakage are collected and flow into a vertical standpipe slotted Weir System. The flow rate from the fan units are measured, based on the water depth flowing over the Weir.

If the drainage rates for all five units are nearly the same, it can be concluded that their water is condensate from the containment atmosphere. A particular unit with a high drainage rate, indicates a possible leak in one of the cooling coils. In series with each transmitter signal is an alarm for "C.B. Fan Cooler Cond. High Level." The affected unit will be identified by individually monitoring the drainage flow from each unit using a rotary selector switch.

The containment sump under normal operation collects water from various drains within containment. This water is then pumped to the waste holdup tank when the sump level reaches the actuation level on the sump pump float switches. The sump pump flow meter measures instantaneous flow (an indication of proper pump performance) while the totalizer measures cumulative flow, which is used to indicate changes in sump accumulations.

When the level in the containment sump increases to the float actuation level, one sump pump will start. If the level continues to increase, the second pump starts. There is constant containment sump level indication provided in the Control Room via two independent level indicators. Also, through use of the containment sump flow meter and totalizer, any increase in sump accumulation because of a leak would be detected. If the containment sump level should approach an overflow condition, either because the two pumps cannot keep up with the leak or due to failure of both pumps, an alarm will annunciate in the Control Room via an additional level indicator installed at the top of the containment sump. At this point, water will overflow into the normally empty recirculation sump which will be indicated by the level indication in the control room.

Water collecting in the reactor pit is pumped out via two sump pumps, each pump discharging into an individual check valve that joins a common header and discharges into the containment sump. The reactor pit is normally kept dry. Level alarms in the reactor pit will annunciate in the Control Room if water should accumulate in this area. Also, an indicating light located in the control room will indicate when reactor pit sump pump number 31 is running.

References

1. WASH 1400
2. NRC Letter, A Schwencer to NYPA, Enclosing a Confirmatory Order dated February 11, 1980.
3. NRC Generic Letter 80-14, February 23, 1980, LWR Primary Coolant System Pressure Isolation Valves.
4. NRC letter Dated August 20, 1993, "Supplemental Safety Evaluation of the Second 10 Year Interval Inservice Testing Program and Associated Relief Request for Indian Point Nuclear Generating Unit No. 3 (TAC No. M85108)."

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TABLE 6.7-1

CLASS 1 FLUID SYSTEMS FOR WHICH NO SPECIAL LEAK DETECTION IS PROVIDED

<u>System</u>	<u>Remarks on Leakage Detection (Items a, b, and c are found in the text of Section 6.7.1)</u>
1. Residual Heat Removal (RHR)	Refer to items a, b, c, and Section 6.7.1.2
2. Component Cooling	Refer to item c and Section 6.7.1.2
3. Service Water	Refer to item c and Section 6.7.1.2
4. Auxiliary Feedwater	Visual
5. Waste Disposal	Auxiliary building sump pump operation and refer to item a.

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TABLE 6.7-2

RESULTS OF LEAK TESTS OUTSIDE CONTAINMENT

<u>System</u>	<u>Leak Rate</u>
Volume Control Tank	0
Residual Heat Removal System	31.5 cc/min
Safety Injection System	3 cc/min
Primary Sample System	1 drop/hr
Post Accident Containment Sampling System	0
Modified Post Accident Containment Sampling System	10 cc/min

*NOTE: The above data are provided as information only.

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TABLE 6.7-3

REACTOR COOLANT SYSTEM (RCS)
PRESSURE ISOLATION VALVES (PIVs)

SI-838-A	SI-857D	SI-857M	SI-895B
SI-838-B	SI-857E	SI-857N	SI-895C
SI-838-C	SI-857F	SI-857P	SI-895D
SI-838-D	SI-857H	SI-857Q&R ⁽¹⁾	SI-897A
SI-857 A&G ⁽¹⁾	SI-857J	SI-857S&T ⁽¹⁾	SI-897B
SI-857B	SI-857K	SI-857U&W ⁽¹⁾	SI-897C
SI-857C	SI-857L	SI-895A	SI-897D

*NOTE: (1) See Section 6.7.2.3, Part IV for a discussion of these pairings.

6.8 HYDROGEN RECOMBINATION SYSTEM

On April 14, 2005, the NRC issued Unit 3 License Amendment 228 (Reference 12) which eliminated the requirement for hydrogen recombiners to provide any combustible gas control function. Therefore, the technical specification requirements for the hydrogen recombiners have been eliminated. However, the actual equipment remains in service until such time that an alternate disposition of this equipment is established and implemented.

In addition, Technical Specification requirements for the hydrogen monitoring instruments (HCMC-A and -B) were eliminated and replaced by a licensee commitment to maintain the monitors as reliable and functional through a preventive maintenance program. This license amendment also resulted in the Regulatory Guide 1.97 categorization for these instruments being changed from Category 1 to Category 3.

6.8.1 Design Bases

The design bases for the hydrogen control following a postulated Loss-of-Coolant Accident are as follows:

- 1) The system shall prevent the hydrogen concentration in the containment volume from exceeding 3% by volume following a design basis accident.
- 2) The system shall be capable of performing its design function in the containment environment following a design basis accident, i.e., withstand the accident and be capable of beginning operation as required when the containment pressure is near ambient.
- 3) The system shall be designed to withstand the design basis earthquake and still be capable of operation.
- 4) The system shall be sufficiently redundant and independent to the extent that no single active or passive failure can negate the minimum requirements of operation.
- 5) The system shall be testable during normal operating conditions of the plant.

6.8.2 System Design and Operation

System Description

The electric hydrogen recombiner systems installed at Indian Point 3 are engineered safety features to control the hydrogen generated in the containment following a Loss-of-Coolant Accident. The redundant systems are designed to seismic Class I Standards.

Two full rated, redundant and independent systems are provided. Each recombiner is powered from a separate safety related MCC. Each is capable of maintaining the ambient H₂ concentration at or below three volume percent (v/o).

Each recombiner system consists of a control panel located in the Control Room, a power supply cabinet located in the lower electrical cable tunnel, at elevation 34 ft., and a recombiner located on the operating deck at elevation 95 ft. in the Containment. The electric hydrogen recombiners are located in the southeast and southwest quadrants of the containment

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approximately 90° apart in the same location as the old flame type recombiners they are replacing. There are no moving parts or controls inside the containment. Heated air within the unit causes airflow by natural convection. The recombiner is a completely passive device.

To regulate the power supply to the recombiner, the power supply cabinet contains an isolation transformer and a controller. This equipment will not be exposed to the post-LOCA environment. The controls for the power supply are located in the Control Room and are manually actuated.

Each hydrogen recombiner consists of the following components:

- 1) A preheater section, consisting of a shroud placed around the central heaters to take advantage of heat conduction through the central walls, for preheating incoming air.
- 2) An orifice plate to regulate the rate of airflow through the unit.
- 3) A heater section, consisting of four banks of metal-sheathed electric resistance heaters, to heat the air flowing through it to hydrogen-oxygen recombination temperatures.
- 4) An exhaust chamber, which mixes and dilutes the hot effluent with containment air to lower the temperature of the discharge stream.
- 5) An outer enclosure to protect the unit from impingement by containment spray.

The recombiner unit is manufactured of corrosion-resistant, high-temperature material. The electric hydrogen recombiner uses commercial-type electric resistance heaters sheathed with Incoloy-800 which is an excellent corrosion-resistant material for this service. The recombiner heaters operate at significantly lower power densities than similar heaters used in commercial practice.

System Operation

Each recombiner is operated from its control panel located in the Central Control Room. Emergency operating procedures direct that the hydrogen concentration in the containment be monitored (by manual sampling or with the hydrogen analyzers) following a LOCA or high containment pressure condition and that the hydrogen recombiners be actuated in time to prevent reaching a hydrogen concentration of 4.0 volume percent. System operating procedures provide instructions for the operator to manually put the recombiners in service from the control panel. The recombiner, power supply panel and control panel are shown on Plant Drawings 9321-F-30064 and -30065 [Formerly Figures 6.8-2 and 6.8-2A]. The power panel for the recombiner contains an isolation transformer and a controller to regulate power into the recombiner. This equipment is not exposed to the post-LOCA containment environment.

To control the recombination process, the correct power input to bring the recombiner above the threshold temperature for recombination is set by adjusting a potentiometer located on the control panel. The correct power required for recombination depends upon containment atmosphere conditions and is determined when recombiner operation is required. For equipment test and periodic checkout, a temperature controller is provided on the control panel to automatically bring the recombiner to the recombination temperature.

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The containment atmosphere is heated within the recombiner in a vertical duct, causing it to rise by natural convection. As it rises, replacement air is drawn through intake louvers downward through a preheater section which will temper the air and lower its relative humidity.

The preheated air then flows through an orifice plate, sized to maintain a 100 SCFM flowrate, to the heater section. The airflow is heated to a temperature above 1150°F, the reaction temperature for the hydrogen-oxygen reaction. Any free hydrogen present reacts with atmospheric oxygen to form water vapor. After passing through the heater section, the flow enters a mixing section, which is a louvered chamber where the hot gases are mixed and cooled with containment atmosphere before the gases are discharged directly into the containment. The air discharge louvers are located on three sides of the recombiner. To avoid recirculating previously processed air, no discharge louvers are located on the intake side of the recombiner. (Reference 10)

Tests have verified that the hydrogen-oxygen recombination is not a catalytic surface effect associated with the heaters but occurs due to the increased temperature of the process gases. As the phenomenon is not a catalytic effect, saturation of the unit cannot occur (References 1 and 9).

Instrumentation

The recombiners do not require any instrumentation inside the containment for proper operation after a LOCA. The recombiners are started manually after a LOCA. The sampling system is used to obtain containment atmosphere samples that indicate when the recombiners or the venting system should be actuated. Control measures can be initiated when the hydrogen concentration reaches 3.0 volume-percent.

The thermocouples and temperature transmitters located in the thermocouple splice box are used for testing and calibration only. Their failure will not affect the safety function of the recombiner.

Power Supply

Supply power for the electric recombiners is provided from safety related 480 MCC's 36C and 36B which are backed up by emergency diesel generators 31 and 32, respectively.

In order to prevent overloading of the diesel generators, the electric hydrogen recombiners will be deenergized on loss of offsite power or on a safety injection (SI) signal. Manual operator action will be required to restart the recombiners once adequate diesel generator capacity is available.

Post Accident Containment Atmosphere Sampling System

Following an accident, containment atmosphere is monitored for hydrogen concentration. A two channel redundant system is provided. Samples are taken from the plenum chambers of the containment recirculation fan units. Train A monitor takes suction from the plenum chambers of fan units 32 and 35. The train B monitor takes suction from the plenum chambers of fan units 31, 33 and 34.

Sampling should begin with the first 7 hours following diagnosis of a LOCA or MSLB inside containment. (Reference 11)

To assure that stratification effects or sample errors would not permit all or parts of the containment to hold hydrogen in excess of the lower flammable limit (4.1 v/o) when the measured concentration is 3.0 v/o, the following checks were made: It was determined that the minimum reliable air circulation capacity by three of the main recirculation fans within the containment could recirculate the entire containment air volume at an average rate of 4.8 times an hour (or 210,000 cfm capacity based upon pressure decay to ambient conditions for fan operation). But the calculated hydrogen generation rate during the first day post accident is 17,100 SCF yielding a ratio of air circulation to hydrogen generation in excess of 17,7000:1. Due to the decreased rate of hydrogen generation with time, the ratio increases to an even greater value before the hydrogen concentration in the containment reaches two volume percent. At a conservatively predicted generation rate, 60 hours are required to produce hydrogen in the amount of two percent of containment volume. During this same period, the entire atmosphere of the containment would have been recirculated, on the average, 288 times. Furthermore, the air handling system is designed to promote the interchange of air in all regions of the containment to avoid the possibility of accumulation of hydrogen in stagnant pockets or strata. For example, in the highest part of the containment dome (above the top spray ring), minimum air recirculation provides one air change approximately every 61 seconds. For these reasons it is concluded that the stratification error is negligible.

Based on the foregoing discussion, it is concluded that the three volume percent design concentration for operating the recombiner provides more than adequate margin for error associated with sampling the containment atmosphere. The calculated containment hydrogen concentration does not reach three volume percent until 10 days post accident, so it is highly unlikely that any significant concentration gradient will exist in the containment when the recombiner is started. Furthermore, since tests have been run with a full scale recombiner system at hydrogen concentrations up to and including 4.0 volume percent hydrogen, a hydrogen concentration between 2 and 3.5 volume percent at the recombiner suction would have no adverse effect on the recombiner operation.

6.8.3 Design Evaluation

The analysis of post-LOCA hydrogen production and accumulation in the containment is presented in Section 14.3.7. To determine the effectiveness of the recombiner, it is assumed that it will be activated before the containment hydrogen concentration reaches the design limit of 3 volume-percent. Starting the recombiner at below 3% provides substantial margin in time to reach the lower flammability concentration of 4.1%. The capacity of the recombiner, working in a 3% hydrogen environment, is at least 3 SCFM of hydrogen gas.

The results of the Regulatory Guide 1.7 analysis indicate that 3% hydrogen occurs at approximately 5.5 days (Figure 14.3-79) and the corresponding aggregate hydrogen production rate is approximately 1.6 SCFM (Figure 14.3-75). This production rate is well within the capacity of the recombiner. Further, because the hydrogen production rate decreases with time, the recombiner can easily accommodate hydrogen concentrations greater than 3%. Thus, starting a recombiner before the containment hydrogen concentration reaches 3% will ensure that the concentration remains well below the lower flammability limit.

Hydrogen stratification in the containment post-LOCA is minimized by the operation of the containment fan coolers. The containment coolers circulate air within the containment volume (Section 6.8.2). A containment sampling line is located near the inlet of each fan cooler.

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Assuming that 3 of 5 fan coolers are operating and that the flow rate per unit is 34,000 cfm (design flow rate during accident conditions) results in an average air flow of approximately 18.8 containment volumes per day per unit.

The recombiners are located in an open area of the containment on the 95' elevation operating deck.

The calculated average hydrogen concentration in containment reaches three volume percent in approximately 5.5 days (Safety Guide 7 basis, Figure 14.3-79). Based on this relatively small hydrogen production rate (average less than 5 SCFM, approximately 1.6 SCFM at 5.5 days, Figure 14.3-75) and the large air mixing rate described above, the bulk of the containment volume is expected to be well mixed, and no significant hydrogen concentration gradients are expected at either the hydrogen sampling points or at the recombiner locations.

Personnel Doses

The control panel for the hydrogen recombiner is located in the Control Room. The control room is designed to provide radiation protection for the operator following a design basis event. Doses to the control room operators following a large-break LOCA are evaluated in Section 14.3.5. The calculated doses are well within the limits specified in 10 CFR 50, Appendix A, General Design Criterion 19, i.e., 5 rem whole body (TEDE).

6.8.4 Tests and Inspections

The electric hydrogen recombiners underwent extensive testing in the Westinghouse development program. These tests encompassed the initial analytical studies, laboratory proof-of-principle tests, and full-scale prototype testing. The full scale prototype tests include the effect of:

- Varying hydrogen concentrations
- Alkaline spray atmosphere
- Steam effects
- Convection currents
- Seismic effects

A detailed discussion of these tests is provided in references 1 through 9.

Operational tests and inspections are performed to verify the operation of the control system and the ability of the heaters to achieve the required temperature. In addition, a channel calibration of all recombiner instrumentation and control circuits is performed every 24 months.

References

- 1) Wilson, J. F., "Electric Hydrogen Recombiner for Water Reactor Containments," WCAP-7709-L (Proprietary), July 1971, and WCAP-7820 (Nonproprietary), December 1971.
- 2) Wilson, J. F., "Electric Hydrogen Recombiner for PWR Containments – Final Development Report," WCAP-7709-L Supplement 1 (Proprietary), and WCAP-7820, Supplement 1 (Nonproprietary), April 1972.

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- 3) Wilson, J. F., "Electric Hydrogen Recombiner for PWR Containments – Equipment Qualification Report," WCAP-7709-L Supplement 2 (Proprietary), and WCAP-7820, Supplement 2 (Nonproprietary), September 1973.
- 4) Wilson, J. F., "Electric Hydrogen Recombiner for PWR Containments – Long Term Tests," WCAP-7709-L Supplement 3 (Proprietary), and WCAP-7820, Supplement 3 (Nonproprietary), January 1974.
- 5) Wilson, J. F., "Electric Hydrogen Recombiner for PWR Containments," WCAP-7709-L Supplement 4 (Proprietary), and WCAP-7820, Supplement 4 (Nonproprietary), April 1974.
- 6) Wilson, J. F., "Electric Hydrogen Recombiner Special Tests," WCAP-7709-L Supplement 5 (Proprietary), and WCAP-7820, Supplement 5 (Nonproprietary), December 1975.
- 7) Wilson, J. F., "Electric Hydrogen Recombiner IEEE 323-1974 Qualification," WCAP-7709-L Supplement 6 (Proprietary), and WCAP-7820, Supplement 6 (Nonproprietary), October 1976.
- 8) Wilson, J. F., "Electric Hydrogen Recombiner for LWR Containments Supplemental Test Number 2," WCAP-7709-L Supplement 7 (Proprietary), and WCAP-7820, Supplement 7 (Nonproprietary), August 1977.
- 9) Wilson, J. F., "Qualification Testing for Model B Electric Hydrogen Recombiner," WCAP-9346 (Proprietary) and WCAP-9347 (Nonproprietary), July 1978.
- 10) Electric Hydrogen Recombiner Model B Technical Manual, NYPA File 439-100058911.
- 11) NSE 97-3-269 HR
- 12) Letter from P. Milano, NRC to M. Kansler, Entergy: "Issuance of Amendment (228) Eliminating Requirements for Hydrogen Recombiners and Hydrogen Monitors", dated April 14, 2005.

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TABLE 6.8-1

DESIGN DATA FOR HYDROGEN RECOMBINERS

Quantity	2
Power (each) (maximum/minimum) (kW)	75/50
Model	B
Capacity (each) (minimum) (SCFM)	100
Heaters (per recombiner)	
Number	4 banks
Maximum heat flux (Btu/h-ft ²)	2850
Maximum sheath temperature (°F)	1550
Gas Temperatures	
Inlet (°F)	80-155
Outlet of heater section (°F)	1150 to 1400
Exhaust (°F)	Approximately 50° above ambient
Materials	
Outer structure	Type 300 series SS
Inner structure	Incolloy 800
Heater element sheath	Incolloy 800
Base skid	Type 300 series SS
Weight (lb)	4500
Codes and Standards	American Society of Mechanical Engineers Section IX, Underwriters Laboratory, National Electric Manufacturers Association, National Fire Protection Association, Institute of Electrical and Electronic Engineers 279, 308, 323, 344, and 383
Design Data for Power Supplies	
Quantity	2
Electrical Requirements	3 phase, 60 Hz, 480 VAC
Power (max.)	90 kW

APPENDIX 6A

IODINE REMOVAL EFFECTIVENESS EVALUATION
OF CONTAINMENT SPRAY SYSTEM

1.0 INTRODUCTION

The Containment Spray System is an engineered safety system employed to reduce pressure and temperature in the containment following a postulated Loss-of-Coolant Accident. For this purpose, subcooled water is sprayed into the containment atmosphere through a large number of nozzles from spray headers located in the containment dome.

Because of the large ratio of spray drop surface area to containment volume, the spray system also serves as a removal mechanism for fission products postulated to be dispersed in the containment atmosphere. The source term used for the large-break LOCA assumes major core degradation and is defined in Regulatory Guide 1.183⁽⁴⁾ as being a release of gap activity (noble gases, iodines, and alkali metal nuclides) over a half-hour period followed by a core melt that releases additional activity in those three nuclide groups plus additional nuclides over a 1.3 hour duration. The iodine activity is assumed to be primarily in the particulate form (cesium iodide) with small fractions of the iodine in the elemental and organic forms. Nuclides other than the iodines and noble gases are all modeled as being in the particulate form. The sprays are effective at removing elemental iodine and particulates from the containment atmosphere but the organic iodine and the noble gases are not subject to removal by the sprays.

2.0 CONTAINMENT SPRAY IODINE REMOVAL MODEL

Spray removal coefficients for particulates and for elemental iodine were calculated for both the injection and recirculation modes of containment spray operation. Calculation of the containment spray removal coefficients is based on the models documented in NURG-0800, SRP Section 6.5.2⁽¹⁾. The removal coefficients were credited in the Large Break LOCA radiological consequences as documented in Section 14.3.5.

2.1 Elemental Iodine Removal

Elemental iodine removal during the spraying of a fresh solution is highly dependent on the rate at which the fresh solution surface is introduced into the containment atmosphere. The elemental iodine removal coefficient is given by:

$$\lambda_s = \frac{6K_gTF}{VD}$$

Where: λ_s = Elemental spray removal coefficient, hr⁻¹
 K_g = Gas-phase mass transfer coefficient, ft/min
 T = Time of fall of the spray drops, min
 F = Volume flow rate of sprays, ft³/hr
 V = Containment sprayed volume, ft³
 D = Mass mean diameter of the spray drops, ft

The gas phase mass transfer coefficient taken from BNL – Technical Report A-3778², is 3 meter/min or 9.84 ft/min. The average spray droplet fall time of 0.167 minutes was determined based on a spray fall height of 118.5 ft and a spray flow rate of 2,200 gpm. The volumetric flow rate of the sprays is 17,646 ft³/hr. The containment sprayed volume is 2,088,000 ft³. The mass mean diameter of the spray droplets was calculated to be 0.003675 ft.

From these inputs an elemental iodine removal coefficient of 22.7 hr⁻¹ was calculated. The value used in the large break LOCA radiological consequences was reduced to 20 hr⁻¹, which is the upper limit specified in SRP 6.5.2⁽¹⁾.

During the recirculation spray mode the spray flow rate is reduced to 962 gpm with a resulting reduction in iodine removal coefficient to 9.9 hr⁻¹. However, during recirculation the spray solution will gradually become loaded with elemental iodine which will limit the capacity of the spray to remove airborne iodine. The spray removal coefficient would be inversely proportional to the DF achieved for elemental iodine. Thus, when recirculation spray is first credited there is still so little elemental iodine in the sump solution that it would be appropriate to use the removal coefficient of 9.9 hr⁻¹. But, when the DF approaches its defined limit, the removal coefficient would be only a small fraction of its original value. The impact of this varying nature of the removal coefficient can be approximated by setting the removal coefficient to one half of the calculated value (5.0 hr⁻¹). This has the effect of reducing credit for removal of elemental iodine early in the recirculation phase but increasing it in the latter stages of spray removal.

2.2 Elemental Iodine Decontamination Factor

In SRP 6.5.2⁽¹⁾, the maximum removal of elemental iodine is that of a decontamination factor (DF) of 200. The DF is related to the total release to the containment atmosphere which takes place over a 1.8 hour period (based on the source term model provided in Regulatory Guide 1.183⁽⁴⁾).

The elemental iodine decontamination factor for the containment atmosphere achieved by the containment spray system is determined by the following equation:

$$DF = 1 + [V_s / (V_c - V_s)] (PC)$$

Where: DF = Decontamination
 V_s = Volume of liquid in the containment sump, ft³
 PC = Partition coefficient for iodine in water
 V_c = Containment net free volume, ft³

The post LOCA sump volume is calculated to be 386,000 gallons. The partition coefficient for iodine in water is conservatively assumed to be 10,000 based on a sump pH of 7.0. The net free containment volume is 2,610,000 ft³.

The calculated spray decontamination factor is slightly greater than 200. This is reduced to 200 as specified above for use in calculating the large break LOCA radiological consequences. The elemental iodine decontamination factor of 200 is reached at approximately 166 minutes in the calculation of the LOCA doses. No credit for elemental iodine removal by containment sprays is taken after 166 minutes.

2.3 Particulate Iodine Removal

The spray removal coefficient for particulates is given by:

$$\lambda_p = \frac{3hFE}{2VD}$$

Where: λ_p = Particulate spray removal coefficient, hr^{-1}
H = Drop fall height, ft
F = Volume of flow rate of sprays, ft^3/hr
V = Containment sprayed volume
E/D= Ratio of a dimensionless collection efficiency E to the average spray drop Diameter D.

The spray fall height is 118.5 ft; the volumetric flow rate of the sprays during the injection phase is 2,200 gpm (17,646 ft^3/hr). The containment sprayed volume is 2,088,000 ft^3 . From SRP 6.5.2⁽¹⁾, the E/D ratio is 10 m^{-1} until a DF of 50 is attained (i.e., when the aerosol activity released from the core is reduced by a factor of 50) and is a factor of ten lower after a DF of 50 is achieved.

From these inputs the particulate iodine removal coefficient was calculated to be 4.6 hr^{-1} for a particulate iodine DF less than or equal to 50. The injection phase of the containment spray system is in operation until 45 minutes into the accident. With the activity release from the core having a duration of 1.8 hours⁽⁴⁾, most of the particulates are not released to the containment atmosphere until after the spray injection phase is over. During the spray recirculation phase the volumetric spray flow is reduced to 962 gpm (7,716 ft^3/hr) and the resulting removal coefficient for particulates is 2.0 hr^{-1} (after a DF of 50 is reached, the removal coefficient drops to 0.2 hr^{-1}).

References

1. NUREG-0800, Standard Review Plan, Section 6.5-2, "Containment Spray as a Fission Product Cleanup System," Revision 2, U.S. Nuclear Regulatory Commission, December 1988.
2. BNL – Technical Report A-3788, "Fission Product Removal Effectiveness of Chemical Additives in PWR Containment Sprays," Davis, Nourbakhsh, and Khatib-Rahbar, dated 8/12/86.
3. Deleted
4. Regulatory Guide 1.183, "Alternate Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors," July 2000, U.S. Nuclear Regulatory Commission.

APPENDIX 6B

PRIMARY SYSTEM LEAK DETECTION INTO INDIAN POINT 1 CONTAINMENT VESSEL

[Historical Information Only]

CAUTION

Appendix 6B shows the leak detection methodology to **Indian Point 1**. The assumptions and constants contained in this appendix **should not be used for Indian Point 3 leak detection calculations**.

1.0 INTRODUCTION

Small leaks developed in the primary system pressure boundary could be detected by several continuously recording instruments available to the plant operators. The most sensitive of these detectors is the radioactive air particulate monitor which continuously samples the air in the containment cooling system. The purpose of the containment cooling system is to maintain proper ambient temperatures for equipment in the containment vessel. This system takes air from the upper elevations of the vessel and recirculates it through cooling coils on the suction side of the supply fan. This air is then discharged at a rate of 40,000 cfm. The turnover rate of air in the containment vessel as a result of this system is approximately once every hour. By sampling air from the discharge of the containment cooling system supply fan, leak rates as small as 0.3 gph (20 cc/minute) could be detected.

Another detector, the radiogas monitor, sampling air from the same position as the air particulate monitor, continuously analyzes air from the containment cooling system for gaseous radioactivity. This monitor is capable of detecting a leak rate of about 100 gph (6500 cc/minute).

In addition to measuring changes in the radioactivity of the containment vessel, dew point sensors continuously sample the air from the suction side of the containment cooling system supply fans. These instruments could detect a primary coolant leak rate of approximately 4 gph (250 cc/minute) by measuring changes in the moisture content of the containment vessel.

By the use of the above instruments, plant operators could continuously monitor the containment vessel for primary system leakage and taken any steps necessary to operate the facility safely. Measurements made by the New York University Medical Center, Institute of Environmental Medicine, have shown that the samples analyzed by these instruments are representative of the containment vessel and that samples taken manually to back up these detectors were accurate to within a factor of 2.

Other methods for detecting and locating primary system leakage include visual inspection for escaping steam or water, boric acid crystal formation, component and primary relief tank levels, hydrogen concentration and radioactivity, containment sump level, and manually taken samples for tritium radioactivity in condensed moisture from the containment vessel.

2.0 SAMPLE CALCULATIONS

To determine the leak rate utilizing measurements from the instrumentation discussed in Paragraph 1.0 the following method must be applied:

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Assumptions

The calculations are based on the assumption that:

- 1) Uniform mixing in the Containment occurs within one hour after initiation of the leak when one cooling fan is in service at a flow of 40,000 cfm.
- 2) The smallest significant change for the radiogas monitor which reflects the presence of a leak is 1 count per second (cps), which is equivalent to an increase in activity of 3×10^{-7} $\mu\text{c/cc}$ of air.
- 3) The smallest significant change for the particulate monitor which reflects the presence of a leak is 8 cps, which is equivalent to an increase in activity of 8×10^{-9} $\mu\text{c/cc}$ of air.
- 4) A period of eight hours is used to evaluate these changes, which provides time for checking the instrumentation and determining the cause of the leak. The eight hour period is predicated for determining the magnitude of small leaks; large leaks would be evaluated much sooner.

Basic Data Used for Calculation

- 1) Containment volume: $1.8 \times 10^{-6} \text{ ft}^3$ ($5.05 \times 10^{10} \text{ cc}$)
- 2) Normal containment environment:
 - a) Average temperature: 120° F
 - b) Dewpoint temperature 70° F
 - c) Water content: 0.016 lbs of water/lb of dry air
- 3) Normal radioactivity in the containment cooling system:
 - a) Radiogas: 2.5 cps ($7.5 \times 10^{-7} \mu\text{c/cc}$)
 - b) Particulate: 16 cps ($1.6 \times 10^{-3} \mu\text{c/cc}$)
- 4) Normal primary coolant radioactivity after one hour:
 - a) Radiogas: $5 \times 10^{-3} \mu\text{c/ml}$ of H_2O
 - b) Particulate: $5 \times 10^{-2} \mu\text{c/ml}$ of H_2O

Calculations

Dewpoint

The smallest leak that can be detected will result in an increase in the dewpoint reading from 70 F to 74 F. The water content of the containment atmosphere at a 74 F dewpoint would be 0.018 lbs of water per lb of dry air.

Letting

- X = the leak rate into the Containment in gph
 h_a = the water content as a dewpoint of 70 F
 h_b = the water content as a dewpoint of 74 F
 V_c = the volume of the Containment in ft^3

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p_a = the density of the containment atmosphere in lb/ft³
 t = the evaluation period, and
 k = 8.3 lbs/gallon for water

Then:

$$\begin{aligned}
 X &= (h_b - h_a) V_c p_a / t k \\
 \text{or } X &= (0.018 - 0.016) (1.8 \times 10^6) (0.081 \times 109/121) (8) (8.3) \\
 &= 3.95 \text{ gph (100 gpd)}
 \end{aligned}$$

Radiogas Activity

For the smallest significant change for the radiogas monitor (1 cps) the corresponding leak rate could be determined as follows:

Let Y = the leak rate into the Containment in gph
 C_g = the radiogas activity increase (3.0×10^{-7} $\mu\text{c/cc}$ of air)
 V^c = the volume of the Containment in cc
 T = the evaluation period
 I^g = the primary coolant radioactivity after one hour, and
 k = 3.8×10^3 ml/gal for water

Then:

$$\begin{aligned}
 Y &= C_g V_c / t I_g k \\
 \text{or } Y &= (3.0 \times 10^{-7}) (5.05 \times 10^{10}) / (8) (5 \times 10^{-3}) (3.8 \times 10^3) \\
 &= 99.8 \text{ pgh (2400 gpd)}
 \end{aligned}$$

Particulate Activity

For the smallest significant change for the particulate monitor (8 cps) the corresponding leak rate could be determined as follows:

Let

Z = the leak rate into the Containment in gph
 C_p = the particulate activity increase (8×10^{-9} $\mu\text{c/cc}$ of air)
 V_c = the volume of the Containment in cc
 t = the evaluation period
 I_p = the primary coolant radioactivity after one hour, and
 k = 3.8×10^3 ml/gal for water

Then:

$$\begin{aligned}
 Z &= C_p V_c / t I_p k \\
 \text{or } Z &= (8 \times 10^{-9}) (5.05 \times 10^{10}) / (8) (5 \times 10^{-2}) (3.8 \times 10^3) \\
 &= 0.265 \text{ gph (6 gpd)}
 \end{aligned}$$

APPENDIX 6C

CHARCOAL FILTER REMOVAL OF METHYL IODIDE BY ISOTOPIC EXCHANGE

1. INTRODUCTION

It was postulated that radioactive iodine in organic forms, principally methyl iodide, exists in the containment atmosphere following a loss of coolant accident. Engineered Safety Features which can remove this radioactive methyl iodide are reactive sprays, charcoal filters by absorption, and impregnated charcoal filters by isotopic exchange. At the present time, no credit is taken for methyl iodide removal by sprays or charcoal filter absorption. Since isotopic exchange of radioactive methyl iodide with iodine impregnated charcoal filters is the only form of active removal considered, a model which accurately describes this process has been derived. It should be noted that the original charcoal filters installed at Indian Point 3 have been replaced. The carbon used in these replacement filters is co-impregnated with triethylene diamine (TEDA) and potassium iodide (KI) to enhance the ability to absorb organic radioiodine compounds. The bases of this evaluation are nevertheless valid and the results applicable. The installed Nuclear Grade Activated Charcoal is tested in accordance with ASTM D3803-1989, per the IP3 response to Generic Letter 99-02.

The isotopic exchange reaction between the radioactive methyl iodide in the containment atmosphere and the iodide impregnant on the charcoal filters is of the form:



The equilibrium constant for this reaction is defined as:

$$\text{K}_{\text{eq}} = [\text{CH}_3\text{I}] [\text{Ic}^*] / [\text{CH}_3\text{I}^*] [\text{Ic}] = 1 \quad (2)$$

where

- $[\text{CH}_3\text{I}]$ - is the grams of iodine as methyl iodide in the containment atmosphere
- $[\text{CH}_3\text{I}^*]$ - is the curies of iodine as methyl iodide in the containment atmosphere
- $[\text{Ic}]$ - is the grams of iodine impregnant on the filter
- $[\text{Ic}^*]$ - is the curies of iodine on the filter impregnant

2. MATHEMATICAL BASIS FOR THE MODEL

From a material balance on the balance on the containment atmosphere, the rate of change of specific activity of iodine as methyl iodide (in the containment atmosphere) can be expressed as:

$$dC_1 / dt = [-\lambda_F (C_{\text{in}} - C_{\text{out}}) - ([\lambda_D + \lambda_L C_1] \quad (3)$$

where:

- C_1 - is the specific activity, defined as curies of a species per gram of the same species, of iodine as methyl iodide in the containment atmosphere.
- λ_F - rate constant for isotopic exchange reaction (hr^{-1})

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- λ_D - decay rate (hr^{-1})
- λ_L - containment leak rate (hr^{-1})
- C_{in} - specific activity of methyl iodide in air stream entering filter
- C_{out} - specific activity of methyl iodide in the air stream exiting from the filter

The radioactive iodine on the filter impregnant can expressed as:

$$dC_2/dt = [\lambda_F (C'_{in} - C'_{out}) - \lambda_D (C_2)] \quad (4)$$

where

- C_2 - is the iodine specific activity of the filter impregnant

The term $\lambda_F (C'_{in} - C'_{out})$ is the rate of change of specific activity of the impregnant by isotopic exchange in units of curies per gram of iodine impregnant per hour.

An analytical expression is obtained by integrating equations (3) and (4) with time and assuming:

- a) The specific activity of the air stream exiting from the filter is in equilibrium with the specific activity on the filter.
- b) The amount of stable iodine as methyl iodide at time zero remains constant with time.

3. APPLICATION OF CHARCOAL FILTER MODEL TO INDIAN POINT 3

A study was performed to evaluate the effects of the charcoal filter model on the removal of radioactive methyl iodide from the containment atmosphere and the buildup of radioactive iodine on the filter impregnant by isotopic exchange. This evaluation used the following parameters:

- 1) Plant Power – 3116 MWt
- 2) Containment Free Volume – $2.61 \times 10^6 \text{ ft}^3$
- 3) 6.0 grams of iodine per MWt in the core after 830 days of operation
- 4) Core Inventories per MWt after 830 days of operation, as follows:
 - I-131 – 2.51×10^4 curies/MWt
 - I-132 – 3.81×10^4 curies/MWt
 - I-133 – 5.63×10^4 curies/MWt
 - I-134 – 6.58×10^4 curies/MWt
 - I-135 – 5.10×10^4 curies/MWt
- 5) 2.5% of core iodine released to the containment atmosphere as methyl iodine
- 6) 36 charcoal filter cells with 2 pounds of iodine impregnant per cell, i.e., minimum safeguards
- 7) Containment leak rate schedule
 - a) 0.001/day → 0-24 hrs
 - b) 0.00045/day → 24-720 hrs

8) Air flow through charcoal filters – 24000 CFM

9) The iodide removal rate-constant, λ_F in Eqs. (3) and (4), is defined as the air flow through the filters (fraction of the containment volume per hour) times the filter efficiency for methyl iodides. A filter efficiency of 70% was assumed in this analysis.

Test data from the charcoal manufacturer, for the original charcoal filters which were installed at Indian Point 3, impregnated with KI₃, show a removal efficiency of 98.9% for methyl iodide under conditions (130°C/90% RH) similar to post-LOCA conditions.

Test data from two charcoal manufacturers for charcoal filters coimpregnated by KI and TEDA, of the type installed at Indian Point 3, show a slightly higher removal efficiency of 99%.6% for methyl iodides.

For either types of impregnated charcoal filters, the assumption of 70% removal efficiency is thus conservative. Results of the analysis are presented in Figures 6C-1 through 6C-10.

4. DISCUSSION OF RESULTS

Figures 6C-1 through 6C-5 show the decrease of specific activity of iodine as methyl iodide in the containment and the buildup of radioactive iodine on the filter impregnant by isotopic exchange over a 30-day period. Figures 6C-6 through 6C-10 correspond to Figures 6C-1 through 6C-5 except that the latter five figures give the detailed specific activity breakdown for the 0-2 hour period.

5. CONCLUSIONS

It can be seen from the specific activity plots that all isotopes reach an equilibrium value between the filters and the containment atmosphere after which decay and leakage are the only iodine removal mechanism.

APPENDIX 6D

COMPATIBILITY OF MATERIALS UNDER EXPOSURE TO THE POST-ACCIDENT
CONTAINMENT ENVIRONMENT

1.0 DEFINITION OF POST-ACCIDENT CONTAINMENT ENVIRONMENTAL CONDITIONS

As part of the initial license application, an evaluation of the suitability of materials of construction for use in the Reactor Containment System was performed considering the following:

- a) The integrity of the materials of construction of engineered safeguards equipment when exposed to post Design Basis Accident (DBA) conditions, and
- b) The effects of corrosion and deterioration products from both engineered safeguards (vital equipment) and other (non-vital) equipment on the integrity and operability of the engineered safeguards equipment.

Reference post DBA environmental conditions of temperature, pressure, radiation and chemical composition are described in the following sections. The time-temperature-pressure cycle used in the materials evaluation was most conservative since it considered only partial safeguards operation during the DBA. The containment spray and core cooling solutions considered herein include both the design chemical compositions and the design chemical compositions contaminated with deterioration products and fission products, which may conceivably be transferred to the solution during recirculation through the various containment safeguards systems.

The original chemistry for the Containment Spray System utilized an alkaline adjusted sodium borate containment spray with the pH adjusted by sodium hydroxide. Use of granular sodium tetraborate for pH control was implemented at Indian Point 3 (IP3) by License Amendment 236 (Reference 27) to address sump clogging issues raised by Generic Letter 2004-02 (Generic Safety Issue 191). Replacement of sodium hydroxide with sodium tetraborate was the most comparable alternative to sodium hydroxide for pH control. Appendix 6D was updated where appropriate to incorporate this change and much of the updated information was drawn from WCAP-16596-NP. Information for the original sodium hydroxide additive has been retained for historical purposes.

1.1 Design Basis Accident Temperature-Pressure Cycle

Figure 6D-1 presents the temperature-pressure-time relationship following the Design Basis Accident. These figures represent the Containment condition for the following safety feature operation: one of the two containment spray pumps is considered to inject 3000 gpm of boric acid solution into the Containment. When the Refueling Water Storage Tank is empty, the recirculation pumps supply a flow of 2400 gpm to the spray headers. Recirculation flow through one recirculation pump is cooled in the residual heat exchanger.

Figures 6D-2 and 6D-3 present materials evaluation test conditions for the Containment and core environments, respectively.

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Evaluations of materials were performed, in general, for conditions either simulating the time-temperature conditions of Figure 6D-2 or conservatively considering higher temperatures for longer periods. The basis for each material evaluation is described with the discussion of its particular suitability.

1.2 Design Basis Accident Radiation Environment

Evaluation of materials for use inside containment included a consideration of the radiation stability requirements for the particular materials application. Figures 6D-4 and 6D-5 present the post DBA containment atmosphere direct gamma dose rate and integrated direct gamma dose, respectively. These data were calculated on the basis of a core meltdown and by assuming the following fission product fractional releases consistent with the TID-14844 model:

Noble Gases	Fractional Release	1.0
Halogens	Fractional Release	0.5
Other Isotopes	Fractional Release	0.01

1.3 Design Chemical Composition of the Emergency Core Cooling Solution

Nuclear Regulatory Commission Branch Technical Position MTEB 6-1 (Reference 24) specifies a minimum pH level of 7.0 of the post-accident emergency coolant water, operation higher in the pH 7.0 to 9.5 range for greater assurance that no stress corrosion cracking will occur, and if pH greater than 7.5 is used consideration should be given to hydrogen generation from aluminum.

The ECC system design uses alkaline adjusted boric acid solution as the spray and core cooling fluid. Initially the injection and spray solution are not alkaline adjusted since the RWST contains only boric acid and not sodium tetraborate. It is not until recirculation from the sump, where the injected water has dissolved sodium tetraborate that the spray and core cooling fluid is alkaline adjusted.

Plant design that use the spray solution for retention of fission product iodine in solution, as well as containment cooling, include provisions for addition of chemical additive to the emergency core cooling system. Originally, that additive was a concentrated sodium hydroxide solution. IP3 has since converted to sodium tetraborate granules by License Amendment 236 (Reference 27) to address sump screen clogging issues. Boric acid solution, containing approximately 2600 ppm boron, is pumped from the refueling water storage tank to the containment system by means of the safety injection system pumps, residual heat removal pumps, and the containment spray pumps.

Granular sodium tetraborate is stored in baskets strategically located in the post-accident flooded region of the containment. Initially the containment spray will be boric acid solution from the refueling water storage tank which has a pH of approximately 4.6. As the initial spray solution and subsequently the recirculation solution comes in contact with the sodium tetraborate, the sodium tetraborate dissolves raising the pH of the sump solution to an equilibrium value above 7.0.

8096 pounds of sodium tetraborate is sufficient to assure a post-LOCA sump pH above 7.0 (Reference 25). Dissolution testing performed in support of the buffer change to sodium tetraborate shows that it will dissolve rapidly during the injection phase when submerged in the boric acid solution.

1.3.1 Alkaline Sodium Borate

Plant designs which utilize the containment spray solution for fission product iodine removal, as well as containment cooling, include provisions for injection of chemical additive (sodium hydroxide) to the Emergency Core Cooling System. Boric acid solution, containing approximately 2000 ppm boron, is pumped from the Refueling Water Storage Tank to the Containment System by means of the safety injection pumps, residual heat removal pumps and containment spray pumps.

The chemical additive tank contains sufficient sodium hydroxide solution such that when its contents, the Refueling Water Storage Tank contents, and the Reactor Coolant System fluid are mixed, the resulting pH will be between 7.9 and 10.0. During the initial 30 to 60 minutes of spraying, the spray solution may be at a pH of about 10.

Figure 6D-6 shows a plot of sodium hydroxide concentration versus pH for a 2500 ppm boron solution. Tentative limits of pH between 7.9 and 10 for the mixed spray solution are indicated on this figure.

For the purpose of materials evaluation in the design chemistry solution, the following concentration/time relationship was considered:

0 to 1 hour	:	pH = 10.0,	Boron 2500 ppm
1 hour to 12 months	:	pH = 9.0,	Boron 2500 ppm

The solutions were considered aerated through the entire exposure period.

1.4 Trace Composition of Emergency Core Cooling Solution

During spraying and recirculation, the emergency core cooling solution will wash over virtually all the exposed components and structures in the Reactor Containment. The solution is recirculated through a common sump and hence, any contamination deposited in or leached by the solution from the exposed components and structures will be uniformly mixed in the solution.

The materials compatibility discussion includes consideration of the effects of trace elements which were identified as conceivably being present in the emergency core cooling solution during recirculation.

To identify the trace elements inside containment which may have a deleterious effect on engineered safeguards equipment, one must first, establish which elements are potentially harmful to the materials of construction of the safeguards equipment, and second, ascertain the presence of these elements in forms which can be released to the emergency core cooling solution following a Design Basis Accident. Table 6D-1 presents a listing of the major periodic groups of elements. Elements which are known to be harmful to various metals are noted and potential sources of these elements are identified. A discussion of the effects of these elements is presented in latter sections.

2.0 MATERIALS OF CONSTRUCTION IN CONTAINMENT

All materials in the Containment were reviewed from the standpoint of insuring the integrity of equipment and to insure that deterioration products of some materials do not aggravate the accident condition. In essence, therefore, all materials of construction inside containment must exhibit resistance to the post-accident environment or, at worst, contribute only insignificant quantities of trace contaminants which have been identified as potentially harmful to vital safeguards equipment.

Table 6D-2 lists typical materials of construction used in the Reactor Containment System. Examples of equipment containing these materials are included in the table.

Corrosion testing, described in Section 3.0 of this Appendix, showed that of all the metals tested, only aluminum alloys were found incompatible with the alkaline sodium borate solutions. Aluminum was observed to corrode at a significant rate with the generation of hydrogen gas. Since hydrogen generation can be hazardous to containment integrity, a detailed survey was conducted to identify all aluminum components inside containment.

Table 6D-3 lists the Nuclear Steam Supply System aluminum inventory which is considered present in the Reactor Containment. Included in the table is the mass of metal and exposed surface area of each component. The 1100 and the 600 series aluminum alloys are generally the major types found inside containment. This inventory reflects the determination to exclude as much as practicable the use of aluminum in the Containment.

3.0 CORROSION OF METALS OF CONSTRUCTION IN DESIGN BASIS ECC SOLUTION

Emergency core cooling components are austenitic stainless steel and hence, are quite resistant to corrosion by the alkaline sodium borate solution, as demonstrated by corrosion tests performed at Westinghouse and ORNL.⁽¹⁾ The general corrosion rate for type 304 and 316 stainless steel was found to be 0.01 mils/month in pH 10 solution at 200 F. Data on corrosion rates of these materials in the alkaline sodium borate solution have also been reported by ORNL^(2,3) to confirm the low values.

Extensive testing was also performed on other metals of construction which are found in the Reactor Containment. Testing was performed on these materials to ascertain their compatibility with the spray solution at design post-accident conditions and to evaluate the extent of deterioration product formation, if any, from these materials.

Metals tested included Zircaloy, Inconel, aluminum alloys, cupro-nickel alloys, carbon steel, galvanized carbon steel, and copper. The results of the corrosion testing of these materials are reported in detail in Reference 1. Of the materials tested, only aluminum was found to be incompatible with the alkaline sodium borate solution. Aluminum corrosion is discussed in Section 5.0 of this Appendix. The following is a summary of the corrosion data obtained on various materials of construction exposed for several weeks in aerated alkaline (pH 9.3 – 10.0) sodium borate solution at 200 F. The exposure condition is considered conservative since the test temperature (200 F) is considerably higher than the long-term Design Basis Accident temperature.

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<u>Material</u>	<u>Maximum Observed Corrosion Rate</u> <u>Mil/Month</u>
Carbon Steel	0.003
Zr-4	0.004
Inconel 718	0.003
Copper	0.015
90 – 10 Cu-Ni	0.020
70 – 30 Cu-Ni	0.006
Galvanized Carbon Steel	0.051
Brass	0.010

Tests conducted at ORNL^(2,3) also have verified the compatibility of various materials of construction with alkaline sodium borate solution. In tests conducted at 284 F, 212 F, and 130 F, stainless steels, Inconel, cupronickels, Monel, and Zircaloy-2 experienced negligible changes in appearance and negligible weight loss.

Corrosion tests at both Westinghouse and ORNL have shown copper suffers only slight attack when exposed to the alkaline sodium borate solution at DBA conditions. The corrosion rate of copper, for example, in alkaline sodium borate solution at 200 F is approximately 0.015 mil/month.⁽¹⁾ The corrosion of copper in an alkaline sodium borate environment under spray conditions at 284 F and 212 F has been reported by ORNL. Corrosion penetrations of less than 0.02 mil were observed after 24-hour exposure at 284 F (see Reference 3, Table 3.13), and a corrosion rate of less than 0.3 mil per month was observed at 212 C (see Reference 2, Table 3.6).

The corrosion of copper in the post-accident environment will have a negligible effect on the integrity of the material. Further, the corrosion product formed during exposure to the solution appears tightly bound to the metal surface and hence, will not be released to the ECC solution.

The corrosion rate of galvanized carbon steel in alkaline sodium borate (3000 ppm B, pH 9.3) is also low. Tests conducted in aerated solutions showed the corrosion rate to be 0.003 mil/month (0.046 mg/dm²/hr) and 0.002 mil/month (0.036 mg/dm²/hr) for temperatures of 200 F and 150 F, respectively. It can be seen, therefore, that the corrosion of zinc (galvanized) in alkaline borate solution is minimal and will not contribute significantly to the post-accident hydrogen buildup.

Consideration was given to possible caustic corrosion of austenitic steels by the alkaline solution. Data presented by Swandby⁽⁴⁾ (Figure 6D-7) show that these steels are not subject to caustic stress cracking at the temperature (285 F and below) and caustic concentrations (less than 1 percent by weight) of interest. It can be seen from Figure 6D-7 that the stress cracking boundary minimum temperature as defined by Swandby coincides with a high free caustic

concentration (~40%) and is considerably above the long term post-accident design temperature (~80 F). Further, from Figure 6D-7, a temperature in excess of 500 F is required to produce stress corrosion cracking at a sodium hydroxide concentration greater than 85%.

It should be noted, considering the possibility of caustic cracking of stainless steel, that the sodium hydroxide-boric acid solution is a buffer mixture wherein no free caustic exists at the temperatures of interest, even when the solution is concentrated locally through evaporation of water. Hence, the above consideration is somewhat hypothetical with regard to the post-accident environment.

4.0 CORROSION OF METALS OF CONSTRUCTION BY TRACE CONTAMINANTS IN EMERGENCY CORE COOLING (ECC) SOLUTION

Of the various trace elements which could occur in the emergency core cooling solution in significant quantities, only chlorine (as chloride) and mercury are adjudged potentially harmful to the materials of construction of the safeguards equipment.

The use of mercury or mercury bearing items, however, is prohibited inside containment. This includes mercury vapor lamps, fluorescent lighting and instruments which employ mercury for pressure and temperature measurements and for electrical equipment. Potential sources of mercury, therefore, are excluded from containment and hence, no hazard from this element is recognized.

The possibility of chloride stress corrosion of austenitic stainless steels was also considered. It is believed that corrosion by this mechanism will not be significant during the post-accident period for the following reasons:

1. Low Temperature of ECC Solution

The temperature of the ECC solution is reduced after a relatively short period of time (i.e., a few hours) to about 150 F. While the influence of temperature on stress corrosion cracking of stainless steel has not been unequivocally defined, significant laboratory work and field experience indicates that lowering the temperature of the solution decreases the probability of failure. Hoar and Hines⁽⁵⁾ observed this trend with austenitic stainless steel in 42 percent by weight solutions of $MgCl_2$ with temperature decrease from 310 F to 272 F. Staehle and Latanision⁽⁶⁾ present data which also show the decreasing probability of failure with decreasing solution temperature from about 392 F to 302 F. Staehle and Latanision⁽⁶⁾ also report the data of Warren⁽⁷⁾ which showed the significant change with decrease in temperature from 212 F to 104 F. The work of Warren, while pertinent to the present consideration in that it shows the general relationship of temperature to time to failure, is not directly applicable in that the chloride concentration (1800 ppm Cl) believed to have effected the failure was far in excess of reasonable chloride contamination which may occur in the ECC solution.

2. Low Chloride Concentration of ECC Solution

It is anticipated that the chloride concentration of the ECC solution during the post-accident period will be low. Throughout plant construction, surveillance was maintained to ensure that the chloride inventory inside containment would be maintained at a minimum. Controls on use of chloride bearing substance in containment included the following:

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- a) Restriction in chloride content of water used in concrete
- b) Prohibition of use of chloride in cleaning agents for stainless steel components and surfaces
- c) Prohibition of use of chloride in concrete etching for surface preparation
- d) Use of non-chloride bearing protective coatings inside containment
- e) Restriction of chloride concentration in safety injection solution, 0.15 ppm chloride maximum

The effect of decreasing chloride concentration on decreasing the probability of failure of stressed austenitic stainless steel has been shown by many experimenters. Staehle and Latanision⁽⁶⁾ presented data of Staehle which show the decrease in probability of failure with decrease in chloride concentration at 500°F. Edeleanu⁽⁸⁾ shows the same trend at chloride concentrations from 40 to 20 percent as $MgCl_2$ and reported no failures in this experiment at less than about 5 percent $MgCl_2$.

Instances of chloride cracking at representative ECC solution temperatures and at low solution chloride concentration have generally been on surfaces on which concentration of the chloride occurred. In the ECCS, concentration of chlorides is not anticipated since the solution will operate subcooled with respect to the containment pressure and, further, the containment atmosphere will be 100% relative humidity.

3) Alkaline Nature of the ECC Solution

The ECC solution will have a solution pH greater than 7.0 after dissolution of the sodium tetraborate additive stored in containment. Numerous investigators have shown that increasing the solution pH decreases the probability of failure. Thomas et al.⁽⁹⁾ showed that the failure probability decreases with increasing pH of boiling solutions of $MgCl_2$. More directly applicable, Scharfstein and Brindley⁽¹⁰⁾ showed that increasing the solution pH to 8.8 by the addition of NaOH prevented the occurrence of chloride stress corrosion cracking in a 10 ppm Cl⁻ (as NaCl) solution at 185°F. Thirty stressed stainless steel specimens, including 304 as received, 347 as received, and 304 sensitized, were tested. No failures were observed.

Other tests runs by Scharfstein and Brindley showed the influence of solution pH on higher chloride concentrations up to 550 ppm Cl⁻; however, in these tests, the pH adjusting agents were either sodium phosphate or potassium chromate. The authors express the opinion, however, that in the case of the chromate solution, chloride cracking inhibition was simply due to the hydrolysis yielding pH 8.8 and not to an influence of the chromate anion. A similar hydrolysis will occur in the borate solution.

Studies conducted at Oak Ridge National Laboratory by Griess and Bocarella⁽¹¹⁾ on type 304 and type 316 stainless steel U-bend stress specimens exposed to an alkaline borate solution (0.15M NaOH –0.28M H_3BO_3) containing 100 ppm chloride (as NaCl) showed no evidence of cracking after 1 day at 140 C, 7 days at 100 C, and 29 days at 55 C. These extreme test conditions, combined with the fact that some parts of the test specimens were subjected to severe plastic deformation and intergranular attack before exposure, show that the probability of chloride induced stress corrosion cracking in a post-accident environment is very low indeed.

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Westinghouse corrosion tests (Reference 26) showed that at pH 7, 100 ppm Cl, sensitized and non-sensitized samples of 304 stainless steel cracked in approximately 7.5 and 10 months, respectively. Based primarily on those results, Branch Technical Position MTEB 6-1 (Reference 24) recommends that the minimum pH of the sump solution should be 7.0 and that the higher the pH, in the range 7 to 9.5, the greater the assurance that stress corrosion cracking will not occur.

As discussed in section 6D.1.3, the initial pH of the solution will be approximately 4.5 and will increase as the sodium tetraborate dissolves. Therefore, for some period of time the spray solution will be below 7.0. The sodium tetraborate baskets will be submerged within one hour as the RWST is emptied following a LOCA. This envelopes start of recirculation as shown in Table 14.3-55. Dissolution testing in 2500 ppm boric acid solution has shown that sodium tetraborate dissolves rapidly when submerged in the boric acid solution (Reference 23). Westinghouse corrosion tests (Reference 26) indicate that the minimum time to crack (100% crack of a 304 SS welded single U-bend) in a pH 4.5, 100 ppm Cl solution is 3 days and no cracking of any test materials was observed before 8 hours. Thus crack initiation occurred between 8 hours and three days. pH adjustment must occur prior to initiation of cracking. Hence, based on these results, it is necessary that the pH of the sump solution be raised above 7.0 within 8 hours.

Chlorides are not expected to instantaneously appear in the sump solution in concentrations sufficient to initiate cracking. The initial spray and safety injection solution is drawn from the refueling water storage tank where the chloride concentration is limited to 0.15 ppm. The Westinghouse tests indicate that crack initiation in boric acid with 0.4 ppm chloride and pH of approximately 4 requires extended exposure times (12 months in one sample). Hence, cracking will not occur during the relatively brief injection spray and safety injection period.

During recirculation, as the solution washes over the containment structure and components, chlorides and other contaminants will be removed from the surfaces and dissolved in the solution. Concrete is potentially a significant chloride source but is painted with a nuclear qualified coating which is expected to greatly impede chloride leaching. An extended time period will be required for chloride concentration build up to critical concentrations (if they ever do). Since sodium tetraborate has been shown to dissolve rapidly in boric acid solution, the time required to adjust the sump solution pH to greater than 7.0 by dissolution of sodium tetraborate is less than 8 hours, therefore pH adjustment occurs well before chloride concentrations have built up to a critical level.

In summary, therefore, it is concluded that exposure of the stainless steel engineered safety feature components to the ECC solution during the post-accident period will not impair its operability from the standpoint of chloride stress corrosion cracking. The environment of low temperature, low chlorides and high pH (>7.0) which will be experienced during the post-accident period will not be conducive to chloride cracking.

5.0 CORROSION OF ALUMINUM ALLOYS

Corrosion testing has shown that aluminum alloys are not compatible with alkaline borate solution. The alloys generally corrode fairly rapidly at the post-accident condition temperatures with the liberation of hydrogen gas. A number of corrosion tests were conducted in the Westinghouse laboratories and at ORNL facilities. A review of applicable aluminum corrosion data is given in Table 6D-4 and on Figure 6D-8.

For purposes of the resolution of GL 2004-02 in regards to chemical effects on sump strainers, the methodology provided in WCAP-16530-NP-A was used for the prediction of the postulated chemical compounds produced in precipitate form from the corrosion of Aluminum and other materials in containment subject to sump and spray fluid. The results from the WCAP were employed, in conjunction with scaled strainer tests, to quantify head losses to be considered for the strainers when calculating NPSH for the Recirculation and RHR Pumps during the recirculation phase of a LOCA.

5.1. Aluminum Corrosion Products in Alkaline Solution

The corrosion of aluminum in alkaline solution expected following a design basis accident (DBA) has been shown to proceed with the formation of aluminum hydroxide ^(14, 15, 16) and the aluminate ion, as well as with the production of hydrogen gas.

The DBA conditions expected for Indian Point 3 include the establishment of an alkaline ECC solution having a total volume of liquid of 4.47×10^5 gallons after actuation of the Engineered Safety Features.

As mentioned above, aluminum is known to corrode in alkaline solutions to give a precipitate of $\text{Al}(\text{OH})_3$ which, in turn, can re-dissolve in an excess of alkali to form a complex aluminate.

Van Horn⁽¹⁴⁾ noted that the precipitation of $\text{Al}(\text{OH})_3$ begins about pH4 and is essentially complete at pH7. A further increase in pH to about 9 causes dissolution of the hydroxide with the formation of the aluminate.

It can be seen, therefore, that the solubility of aluminum corrosion product is a function of the pH of the environment. Consistent with this, the corrosion of aluminum is also strongly dependent on the solution pH since when the corrosion products are dissolved from the metal surface, corrosion of the base metal can proceed more freely.

Figure 6D-9 presents a plot of aluminum corrosion rate as a function of solution pH.⁽¹⁾ The corrosion rate of aluminum is seen to decrease by a factor of 21 ($1/0.048$) as the pH decreases from 9.3 to 8.3 and by a factor of 83 ($1/0.012$) as the pH decreases from 9.3 to 7.0.

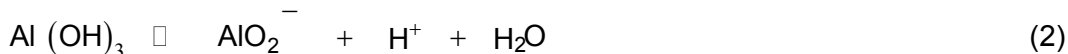
Therefore, one must consider both corrosion and the dissolution of the corrosion products at specific reference conditions since the two are directly related.

The corrosion reactions that are of interest in the DBA condition here would include the reaction of aluminum in alkaline solution to form aluminum hydroxide, i.e.,

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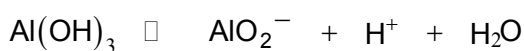
and dissolution of the hydroxide to form the aluminate, i.e.,



A knowledge of the solubility product of the aluminum hydroxide in an alkaline solution allows the determination of the solubility expected for the hydroxide in the DBA environment.

Deltombe and Pourbaix⁽¹⁷⁾ have determined the solubility product of aluminum hydroxide. Using the value of 2.28×10^{-11} for K_{sp} , as reported by Deltombe and Pourbaix, the following calculation can be made.

The solubility of $\text{Al}(\text{OH})_3$ is determined from Equation (2):



$$K_{sp} = [\text{AlO}_2^-] [\text{H}^+]$$

$$2.28 \times 10^{-11} = [\text{AlO}_2^-] [\text{H}^+]$$

at pH = 9.3

$$[\text{AlO}_2^-] = \frac{2.28 \times 10^{-11}}{5 \times 10^{-10}} = 4.6 \times 10^{-2} \text{ moles/liter}$$

Therefore, the solubility of $\text{Al}(\text{OH})_3$ in a pH 9.3 solution at 25 C (77° F) is equal to 4.6×10^{-2} moles/liter or 3.0×10^{-2} lbs/gal. Expressed as aluminum, the solubility at these conditions is 1.05×10^{-2} lbs/gal.

The solubility of the aluminum corrosion products in the post-accident environment is a function of both solution pH and temperature. Figure 6D-10 presents plots of the corrosion product solubility, expressed in terms of aluminum, versus solution pH for temperatures of 77° F and 150° F. The change in solubility with temperature is found utilizing the relationship of the free energy of formation, temperature, and solubility product.

With the data available from Figure 6D-9 and Figure 6D-10 and with a knowledge of the reference aluminum corrosion behavior for any specific plant, one can calculate the expected solubility limits for the corrosion reaction.

For Indian Point 3, there are 4.47×10^5 gallons of ECC solution after actuation of the safety features. The total amount of aluminum present in the Containment is given in Table 6D-3. Table 6D-5 shows the corrosion of aluminum with time for the original (NaOH additive) design basis, pH 9.3, post-accident environment. The pH of the sump solution does not exceed 7.4 with sodium tetraborate used for solution pH control based on Reference 25.

Table 6D-6 presents a summary of the applicable solubility and corrosion parameters for various conditions. The table lists the applicable solubility products (K_{sp}) and solubilities at the various temperatures and solution pH together with the soluble aluminum limit for the system at

the specific conditions. The last values in the table give the aluminum solubility margin after 100 days corrosion, that is, the soluble aluminum limit divided by the aluminum corroded. It can be seen that in all cases, including the very conservative low temperature and low pH conditions, the ECC solution is not expected to be saturated with aluminum corrosion products. Further, within the expected design conditions for temperature and pH, the aluminum solubility margin ranges from approximately 20 to 106.

The preceding analysis is based on the original design basis with sodium hydroxide addition and a pH of 8.5 to 10.0 in the solution. Use of sodium tetraborate reduces the long term solution pH to between 7.1 and 7.4. Figures 6D-9 and 6D-10 show significant (orders of magnitude) decreases in the corrosion rate and solubility of aluminum when the pH is reduced from the 9.3 range to the low 7 range. Corrosion testing at a pH of 8.0 (Reference 23) performed with several buffering agents showed corrosion to submerged aluminum is higher in the presence of sodium Tetraborate compared to sodium hydroxide but was not excessive. This testing rated sodium tetraborate and sodium hydroxide good for overall resistance to corrosiveness.

It is concluded, therefore, that the corrosion products of aluminum will be in the soluble form during the post-accident period considered and hence, there is no potential for deposition on flow orifices, spray nozzles, or other equipment.

Behavior of Circulating Aluminum Corrosion Products

The solubility of aluminum corrosion products has shown that the entire inventory produced after 100 days exposure to the post DBA condition would remain in solution. The review also indicates that the ECC solution is only approximately 17 percent saturated at 77 F and less than 1 percent saturated at 150 ° F.

It is of interest, however, to review the experience of facilities which have operated with insoluble aluminum corrosion products and to relate their conditions with those expected in the post-accident environment.

The most significant experience available was that of Griess⁽¹⁸⁾ who operated a recirculating test facility to measure the corrosion resistance of a variety of materials in alkaline sodium borate spray solution.

Tests were conducted on 1100, 3003, 5052 and 6061 aluminum alloys exposed at 100 ° C in pH 9.3 sodium borate solution (0.15 M NaOH –0.28 M H₃BO₃). It was reported that even though the solution contained copious amounts of flocculent aluminum hydroxide, it had no effect on flow through the spray nozzle (0.093 inch orifice). The pH of the solution did not change because of the increase in the corrosion products.

Griess⁽¹⁸⁾, in describing his observations with regards to aluminum corrosion product deposition potential, stated that:

- a) No significant deposition was observed on that cooling coil installed in the solution
- b) No significant deposition was observed on the heated surfaces of the facility
- c) No significant deposition was observed on isothermal facility surfaces.

The amounts of aluminum corroded to the solution in the tests conducted by Griess at 55 ° C and 100 ° C were approximately 4.0 and 18.6 grams, respectively. The concentration of aluminum present in the recirculation stream, therefore, was approximately 0.2 and 1 gram/liter,

respectively. This value is about a factor of about 5 above the aluminum concentration expected in the post-accident ECC solution at Indian Point 3 in a pH 9.3 (NaOH additive) solution after 100 days. Corrosion testing performed with several buffering agents showed corrosion to submerged aluminum is higher in the presence of sodium tetraborate compared to NaOH but was not excessive.

Hatcher and Rae ⁽¹⁹⁾ describe the appearance of turbidity in the NRU reactor and “propose” that deposition of aluminum corrosion products may have occurred on heat exchanger surfaces, although they do not report any specific examination results. Moreover, Hatcher and Rae report no operations problems associated with the presence of aluminum corrosion product turbidity in the NRU Reactor. The overall heat transfer coefficient for each NRU reactor heat exchanger was measured after 2 years of full power operation on several occasions, and within the limit of accuracy of the measurements, reported at approximately 5%, no change in the thermal resistance had been observed.

It is concluded, therefore, from the work of both Griess and of Hatcher and Rae that the deposition of aluminum corrosion products on heat exchangers surfaces will not be significant in the post-accident environments even for the circumstances of insoluble product formation.

6.0 COMPATIBILITY OF PROTECTIVE COATINGS WITH POST-ACCIDENT ENVIRONMENT

The investigation of materials compatibility in the post-accident design basis environment also included an evaluation of protective coating for use inside containment.

The results of the protective coatings evaluation presented in WCAP-7198(12) showed that several inorganic zincs, modified phenolics, and epoxy coatings are resistant to an environment of high temperature (320° F maximum test temperature) and alkaline sodium borate. Long-term tests included exposure to spray solution at 150 to 175 F for 60 days, after initially being subjected to the conservative DBA cycle shown in Figure 6D-3. The protective coatings which were found to be resistant to the test conditions, that is, which exhibited no significant loss of adhesion to the substrate for formation of deterioration products, comprise virtually all of the protective coatings recommended for use in containment. Hence, the protective coatings will not add deleterious products to the core cooling solution.

An additional evaluation was performed (Reference 22) which evaluated the contribution of zinc corrosion to the amount of hydrogen in the post-LOCA containment atmosphere. Based on simple modeling and engineering judgment, the evaluation shows that hydrogen recombiners will be in service well before any observable contribution can be made by zinc corrosion.

It should be pointed out that several test panels of the recommended types of protective coatings were exposed for two design basis accident cycles and showed no deterioration or loss of adhesion with the substrate.

7.0 EVALUATION OF THE COMPATIBILITY OF CONCRETE-ECC SOLUTION IN THE POST-ACCIDENT ENVIRONMENT

Concrete specimens were tested in boric acid and alkaline sodium borate solutions at conditions conservatively (320 F maximum and 200 F steady state) simulating the post DBA environment.

The purpose of this study was to establish:

- a) The extent of debris formation by solution attack of the concrete surfaces
- b) The extent and rate of boron removal from the ECC solution through boron-concrete reaction.

Tests were conducted in an atmospheric pressure, reflux apparatus to simulate long-term exposure conditions and in a high pressure, autoclave facility to simulate the DBA short term, high temperature transient.

For these tests, the total surface area of concrete in the design containment which may be exposed to the ECC solution following a DBA was estimated at 6.3×10^4 square feet. This value includes both coated and uncoated surfaces. The ECC solution volume for a reference plant was considered at approximately 313,000 gallons and the surface to volume ratio from these values is approximately 29 in²/gallon. The surface to volume ratios for the concrete-boron tests used were between 28 and 78 in²/gallon of solution.

Table 6D-7 presents a summary of the data obtained from the concrete-boron test series.

Testing of uncoated concrete specimens in the post-accident environment showed that attack by both boric acid and the alkaline boric acid solution is negligible and the amount of deterioration product formation is insignificant. Other specimens covered with modified phenolic and epoxy protective coatings showed no deterioration product formation. These observations are in agreement with Orchard⁽¹³⁾ who lists the following resistances of Portland Cement concrete to attack by various compounds:

Boric acid	- little or no attack
Alkali hydroxide solution under 10%	- little or no attack
Sodium borate	- mild attack
Sodium hydroxide over 10%	- very little attack

Exposure of uncoated concrete to spray solution between 320° F and 210° F has shown a tendency to remove boron very slowly, presumably precipitating an insoluble calcium salt. The rate of change of boron in solution was measured at about 130 ppm per month with pH 9 solution at 210 F for an exposed surface of about 36 square inches per gallon of solution (much greater than any potential exposure in the Containment). The boron loss during the high temperature transient test (320 F maximum) was about 200 ppm. Figure 6D-11 shows a representation of the boron loss from the ECC solution versus time by a boron-concrete reaction following a DBA. The time period from 0 to 6 hours shows the loss during a conservative high temperature transient test, ambient to 320° F to 285° F. The data from 6 hours to 30 days is based on 210° F data.

A depletion of boron at this rate poses no threat to the safety of the reactor because of the large shutdown margin and the feasibility of adding more boron solution should sample analysis show a need for such action.

8.0 MISCELLANEOUS MATERIALS OF CONSTRUCTION

8.1 Sealants

Candidate sealant materials for use in the Reactor Containment System were evaluated in simulated DBA environments. Cured samples of various sealants were exposed in alkaline sodium borate solution (pH 10.0, 3000 ppm boron) to a maximum temperature of 320° F.

Table 6D-8 presents a summary of the sealant materials tested together with a description of the panels' appearance after testing. Three generic types of sealants were tested: butyl rubber, silicone, and polyurethane. Each of the materials was the "one package" type, that is, no mixing of components was necessary prior to application. The materials were applied on stainless steel and allowed to cure well prior to testing.

The test results showed that the silicone sealants tested were chemically resistant to the DBA environment and are acceptable for use in containment.

Sealant 780 by Dow Corning Corporation would be acceptable for use in the containment. Major applications of this sealant could be as concrete expansion joint sealant on the liner insulation panels. Sealant 780 will contribute no deterioration products to the ECC solution during the post DBA period and will maintain its structural integrity and elastic properties.

8.2 PVC Protective Coating

Tests were conducted to determine the stability of the polyvinylchloride protective coating, the type which might be used on conduit in the DBA environment. Samples of the PVC exposed to alkaline sodium borate solutions at DBA conditions showed no loss in structural rigidity and no change in weight or appearance.

A sample of PVC coated aluminum conduit (1" OD x 8" length) was irradiated by means of a Co-60 source at an average dose rate of 3.2×10^6 rads/hr to a total accumulated dose of 9.1×10^7 rads. The specimen was immersed in alkaline sodium borate solution (pH 10, 3000 ppm boron) at 70 F. Visual examination of the coating after the test showed no evidence of cracking, blistering or peeling, and the specimen appeared completely unaffected by the gamma exposure. Chemical analysis of the test solution indicated that some bond breakage had occurred in the PVC coating as evidenced by an increase in the chloride concentration. The gamma exposure of approximately 10^8 rad resulted in a release to the solution of 26 mg of chloride per square foot of exposed PVC surface. Considering a total surface area of PVC coating present in containment (approximately 500 ft²) and the ECC solution volume of 313,000 gallons, the chloride concentration increase in the ECC solution due to irradiation of the coating would be approximately 0.01 ppm.

It was concluded, therefore, that PVC protective coating will be stable in the DBA environment.

8.3 Fan Cooler Materials

Samples of the following air handling system materials were exposed in an autoclave facility to the DBA temperature – pressure cycle:

- a) Moisture separator pad
- b) High efficiency particulate filter media
- c) Asbestos separator pads
- d) Adhesive for joining separator pads and HEPA filter media corners
- e) Neoprene gasketing material

The materials were exposed in both the steam phase and liquid phase of a solution of sodium tetraborate (15 ppm boron) to simulate the concentrations expected downstream of the fan cooler cooling coils. Examination of the specimens after exposure showed the following:

- a) Moisture separator pads were somewhat bleached in color, but maintained their structural form and showed good resiliency as removed in both liquid and steam phase exposure
- b) High efficiency particulate filter media maintained its structural integrity in both the liquid and steam phase. No apparent change.
- c) Asbestos separator pads showed some slight color bleaching, however, both steam and liquid phase samples maintained their structural integrity with no significant loss in rigidity
- d) Adhesive material for the HEPA/separator pad edges showed no deterioration or embrittlement and maintained its adhesive property
- e) Neoprene gasketing material is also satisfactory in both the steam and liquid phase. The material showed only weight gain and a shrinkage of 15 to 30 percent based on a superficial, one flat side area. The gasket thickness decreased about 10 percent. The gasket material was unrestrained during the exposure and, hence, the dimensional changes experienced are greater than those which would result in plant applications.

9.0 ENVIRONMENTAL REQUALIFICATIONS

An ongoing program of evaluating the environmental qualifications of safety related electrical equipment at Indian Point 3 has been in progress since early 1980.

Included in this program are evaluations of the following environmental parameters: function, service, location, operating time, temperature, pressure, relative humidity, chemical spray, radiation, aging, submergence, and qualifying method. This evaluation program is based on the provisions of: Code of Federal Regulations, Title 10, Part 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants" and Regulatory Guide 1.89, Revision 1, "Environmental Qualification of Certain Electric Equipment Important to Safety for Nuclear Power Plants." Complete and auditable records are available and will be maintained at a central location. These records described the environmental qualification methods used for all safety related electrical equipment in sufficient detail to document compliance with the requirements of 10 CFR 50.49 and Regulatory Guide 1.89, Rev. 1.

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Such records will be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified. In accordance with schedule requirements of 10 CFR 50.49, all components falling within the scope of this program will be qualified, replaced, or modified to ensure their operation.

The change in pH buffer from sodium hydroxide to sodium tetraborate was evaluated by Reference 28 for impact on existing equipment qualifications for IP3 EQ components. The report determined that EQ components that were qualified for a sodium hydroxide buffered boric acid solution remained qualified for a sodium tetraborate buffered boric acid solution.

References

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- 21) IP3 Technical Specification Amendment 119, June 2, 1992.
- 22) 10CFR50.59 Evaluation EVL-02-3-070 HC, Rev. 0, "Allowance for Additional Aluminum in Containment."
- 23) "Evaluation of Alternative Emergency Core Cooling System Buffering Agents," WCAP-16596-NP Revision 0, July 2006.
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- 27) IP3 Technical Specification Amendment 236, Issued June 9, 2008.
- 28) "Evaluation of IP2 and IP3 Post LOCA Buffered Borate Sump Chemistry for Equipment Qualification" IP-RPT-08-00025, Revision 0.

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Table 6D-1

REVIEW OF SOURCES OF VARIOUS ELEMENTS IN CONTAINMENT
AND THEIR EFFECTS ON MATERIALS OF CONSTRUCTION

Group	Representative Elements	Corrosivity of Elements	Sources of Elements
0	He, Ne, Kr, Xe	No effect on any materials of construction.	Fission product release.
I a	Li, Na, K	Generally corrosion inhibitive properties for steels, and copper alloys – harmful to aluminum.	Li - coolant pH adjusting agent Na - spray additive solution concrete leach product K - concrete leach product
II a	Mg, Ca, Sr, Ba	Generally not harmful to steel or copper base alloys.	Concrete leach products – deteriorated insulation.
III a	Y, La, Ac	Not considered harmful in low concentrations.	Fission product release.
IV a	Ti, Zr, Hf	Not considered harmful to any materials.	Fuel rod cladding, control rod material, alloying constituent.
V a	V, Nb, Ta	Not considered harmful to any materials.	Alloying constituents in low concentration.
VI a	Cr, Mo, W	Not considered harmful to any materials.	Alloying constituents in equipment.
VII a	Mn, Tc, Re	Not considered harmful.	Mn – alloy constituent.
VIII	Fe, Ni, Cr, Os	Fe, Ni, Cr – not harmful to any materials.	Fe, Ni, Cr – alloying constituents. Others have no identifiable sources.
I b	Cu, Ag, Au	Not harmful to any materials.	Cu present as material of construction and alloying constituent.

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II b	Zn, Cd, Hg	Hg – harmful to stainless steel, Cu alloys, aluminum Zn – unknown Cd - unknown	Hg has been entirely excluded from use in the Containment. Cd finish plating on components. Zn galvanizing and alloying constituent.
III b	B, A1, Ga, In	Not harmful to material.	B - neutron poison additive A1 - materials of construction
IV b	C, Si, I, Sn, Pb	C, Si, Sn not harmful to materials. Pb considered harmful to nickel alloys.	Si - concrete leach product Pb - alloy constituent in some brazes
V b	N, P, As, Sb, Bi	No effect from N unless ammonia is formed. Others unknown.	N - containment air. Others not identified in significant materials.
VI b	O, S, Se, Te	S possible harmful to nickel alloys.	Te - fission product S - oils, greases, insulating materials
VII b	F, C1, Br, I	F, considered potentially harmful to Zircaloy. C1, potentially harmful to stainless steel. Br and I, not generally harmful.	C1 - concrete leach product, general contamination F - organic materials I - fission products, low concentration BR - fission products, low concentration

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TABLE 6D-2
MATERIALS OF CONSTRUCTION IN REACTOR CONTAINMENT

<u>Material</u>	<u>Equipment Application</u>
300 Series Stainless Steel	Reactor Coolant System, residual heat removal loop, spray system
400 Series Stainless Steel	Valve materials
Inconel (600, 690, 718)	Steam generator tubing, reactor vessel nozzles, core supports, and fuel rod grids
Galvanized Steel	Ventilation duct work, CRDM shroud material, I & C conduit
Aluminum	Nuclear detectors, I & C equipment, CRDM connectors, paints, reactor vessel insulating foil
4% Mo, 6% Mo Austenitic Stainless Steels	Service water piping, fan cooler material
Copper	Fan and motor cooler tube fin material
Carbon Steel	Component cooling loop, structural steel, main steam piping, etc.
Monel	Possibly instrument housings
Brass	Possibly instrument housings
Protective Coatings Inorganic Zincs Epoxy Modified Phenolics	General use on carbon steel structures and equipment, concrete
Silicones – neoprene	Ventilation duct work gasketing, Sealants

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TABLE 6D-3

INVENTORY OF ALUMINUM IN CONTAINMENT

	<u>Item</u>	<u>Mass (lbs)</u>	<u>Surface area (ft²)</u>
1.	Valve Parts Inside Containment	230	86
2.	Source, Intermediate, and Power Range Detectors	244	83
3.	Power Range Polyethylene Shields	228	255
4.	Paint on Steam Generator, Pressurizer and Reactor Vessel	58	7480
5.	Reactor Vessel Insulating Foil	269	10,000
6.	Process Instrumentation and Control Equipment	159	31
7.	Control Rod Drive Mechanism Fan Blades	800	131.6
8.	Flux Mapping Drive System	1950	335
9.	Reactor Coolant Pump Conduit Boxes	7.2	4
10.	Reactor Coolant Pump Motor Parts	125	12.8
11.	Rod Position Indicators	10.6	3.67
12.	Contingency	408	1842

Note: The data on this table are equivalent to the data on FSAR Table 14.3-64.

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TABLE 6D-4

CORROSION OF ALUMINUM ALLOYS IN ALKALINE SODIUM BORATE SOLUTION

<u>Data Point</u>	<u>Temperature (F)</u>	<u>Alloy Type</u>	<u>Test Duration</u>	<u>Corrosion Rate (mg/dm²/hr)</u>	<u>pH</u>	<u>Exposure Condition</u>	<u>Reference</u>
1	275	5053	3 hrs.	96.2	9	Solution	WCAP-7153, Table 9
2	275	5005	3 hrs.	840	9	Solution	WCAP-7153, Table 9
3	200	6061	320 hrs.	15.4	9.3	Solution	WCAP-7153, Table 8 WCAP-7153, Figure 9
4	210	5052	7 days	53.0	9	Solution	WCAP-7153, Table 7 WCAP-7153, Figure 8
5	210	5052	2 days	14.0	9	Solution	WCAP-7153, Table 5
6	210	5005	2 days	27.1	9	Solution	WCAP-7153, Table 5
7	284	5052	1 day	54	9.3	Spray	ORNL-TM-2425, Table 3.13
8	284	5052	1 day	31.5	9.3	Solution	ORNL-TM-2425, Table 3.13
9	212	6061	3 days	126	9.3	Spray	ORNL-TM-2368, Table 3.6
10	212	6061	3 days	110	9.3	Solution	ORNL-TM-2368, Table 3.6
11	150	6061	7 days	2.9	9.3	Solution	Westinghouse data
12	150	5052	7 days	4.2	9.3	Solution	Westinghouse data

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TABLE 6D-5

CORROSION PRODUCTS OF ALUMINUM FOLLOWING DBA

<u>Time After Reactor Trip (Days)</u>	<u>Mass of Aluminum Corroded (lb x 10⁻²)</u>	<u>Hydrogen Produced (SCF x 10⁻³)</u>	<u>Mass Al (OH)₃ Formed (lb x 10⁻²)</u>
1	2.48	4.96	7.19
5	4.31	8.63	14.5
10	4.52	9.03	13.1
20	4.91	9.82	14.2
30	5.3	10.6	15.4
40	5.7	11.4	16.5
50	6.1	12.2	17.7
60	6.5	13.0	18.8
70	6.9	13.8	20.0
80	7.3	14.6	21.2
90	7.6	15.3	22.0
100	8.1	16.1	23.5

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TABLE 6D-6

SUMMARY OF ALUMINUM CORROSION PRODUCT SOLUBILITY DATA

<u>Parameter</u>	<u>Solution Temperature</u>			
	77 F		150 F	
	<u>pH 9.3</u>	<u>pH 8.3</u>	<u>pH 9.3</u>	<u>pH 8.3</u>
Solubility Product, K_{sp}	2.28×10^{-11}	2.28×10^{-11}	4.16×10^{-10}	4.16×10^{-10}
A1 Solubility, lbs A1/gal	1.05×10^{-2}	1.05×10^{-3}	1.9×10^{-1}	1.9×10^{-2}
Soluble A1 Limit ^(a) for ECCS, lbs	4.69×10^3	4.69×10^2	8.49×10^4	8.49×10^3
A1 Corrosion Rate, Normalized	(Not Used)	(Not Used)	1	0.048
A1 Corroded after 100 Days, lbs	(Not Used)	(Not Used)	810	439 ^(b)
A1 Solubility Margin at 100 Days, lbs	5.8(c)	1.1 ^(c)	105	19

(a) Indian Point 3 solution volume 4.47×10^5 gal.

(b) Value assumes rapid corrosion of all A1 paint and reactor vessel foil insulation.

(c) Note corrosion rate at 150 F was used for "A1 corroded" value; hence, value is very conservative.

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TABLE 6D-7

CONCRETE SPECIMEN TEST DATA

Concrete - Boron Test No.	Total Exposure Period (Days)	Surface/Volume (in ² /gal)	Exposed Weight Change (Grams)	Initial Specimen Weight (Grams)	Visual Examination
1	24	28	-22.4	560.0	No apparent change
3	28	20	+21.5	404.0	Light, yellowish deposit on specimen
4 ^(a)	72	38	0	641.2	No apparent change – coating adhesion excellent
5	72	43	-0.2	769.5	Light, hard deposit on specimen
6	4 ^(b)	54	-	601.4	No apparent change – small amount of sand particles in test can
7	175	23	+11.0	457.0	No apparent change
8 ^(a)	175	38	+26.5	751.0	No apparent change – coating adhesion excellent
9 ^(a)	5 ^(b)	78	+4.0	702.0	No apparent change – coating adhesion excellent

(a) These specimens coated with Phenoline 305. All others were uncoated.

(b) These tests were at high temperature DBA transient conditions. All others at 195 to 205 F.

TABLE 6D-8

EVALUATION OF SEALANT MATERIALS FOR USE IN CONTAINMENT

<u>Sealant Type</u>	<u>Manufacturer</u>	<u>Post-Test Appearance</u>
Butyl rubber	A	Unchanged, flexible
Silicone	B	Unchanged, flexible
Silicone	B	Unchanged, flexible
Polyurethane	C	Sealant bubbled and became very soft. Solution permeated into bubbles.
Polyurethane	C	Sealant swelled and became soft, solution permeated into material.
Polyurethane	C	Sealant swelled, very soft and tacky, solution permeated into material.

APPENDIX 6E

[Historical Information]

SPRAY SYSTEM MATERIALS COMPATIBILITY
FOR LONG TERM STORAGE OF SODIUM HYDROXIDE
(RETAINED FOR HISTORICAL PURPOSES)

A materials compatibility review for the spray additive tank and associated equipment during long term storage of sodium hydroxide is presented in this Appendix. The exposure conditions are shown in Table 6E-1. The materials for the various components are shown in Table 6E-2. The corrosion rates for the various materials at or near the long term exposure conditions with air contamination are shown in Table 6E-3. The immunity of most of the materials in Table 6E-2 to caustic cracking at the exposure conditions listed in Table 6E-1 has been reported by Logan⁽⁶⁾ (See Figure 6E-1). No caustic cracking of 17-4 PH or Stellite has been reported. ⁽⁷⁾

The effect of carbon dioxide from air exposure on corrosion of iron is shown in Figure 6E-2.(8) at pH 14, no additional corrosion is observed over that observed in carbon dioxide free solution. A nitrogen blanket is continuously maintained over the sodium hydroxide solution in the spray additive tank, thus essentially eliminating any carbon dioxide contamination of the solution.

The Nordel* rubber diaphragm material used in the tank valves was exposed in 33 w/o sodium hydroxide solution (NaOH) at 110°F for 6 months and found to be unaffected by the simulated spray additive tank solution. The completely unchanged appearance of Nordel rubber after 6 months exposure in sodium hydroxide solution would indicate that integrity of the Nordel rubber diaphragm in the spray additive tank valves would not be affected by long term exposure to the spray additive solution. The Nordel rubber material has also been analyzed up to 38 w/o NaOH to assure valve operability when exposed to the highest NaOH concentration (See Table 6.3-3).

The integrity of the structural materials in the spray additive tank system would not be adversely affected even using the corrosion rates presented in Table 6E-3, where air contamination is present. In the Indian Point 3 system, where nitrogen blanketing of the spray additive tank would prevent air contamination, the corrosion rates would be even lower with even less effect on the material integrity.

Diamond Shamrock Company⁽¹⁰⁾ reported that no galling of steel valves occurred after exposure to 50% sodium hydroxide solution at 120 to 140°F for more than 3 years. Stainless steel valves, exhibiting lower corrosion rates, would have an even lower propensity toward galling than steel. Therefore, no galling should occur on the valves exposed to the long term storage conditions.

The total corrosion product released to the spray additive tank as oxide would be less than 1000 grams per year with aerated solution and would be much less with the air free solution. This small quantity of corrosion product should not present any problems with clogging of delivery lines.

*NOTE: Nordel is a product of Dupont De Nemours and Company.

No sodium hydroxide precipitation would occur for a 38 w/o solution if the temperature of the tank and liners are maintained above 58°F. The tank is in an area of the auxiliary building that is heated (and the temperature logged) such that no solid sodium hydroxide would be present and therefore no clogging of the lines should occur.

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References

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- 2) Corrosion Data Survey (1960 Edition) (Shell Development Company).
- 3) Resistance of Huntington Alloys to Corrosion (Huntington Alloy Products Division of International Nickel Company, Inc.), page 28.
- 4) Metals Handbook, 8th Edition, Vol. 1, Properties and Selection of Metals, page 670 (American Society for Metals).
- 5) From unreported work performed at WNES laboratories.
- 6) The Stress Corrosion of Metals by H. L. Logan, John Wiley & Sons, Inc., N.Y., 304 and 316 Stainless Steel, page 138, 410 Stainless Steel, page 101, A-516-GR-70, page 44.
- 7) Letter from R. R. Gaugh, Armco Steel on Data from an Armco Internal Report, dated September 26, 1969, to D. D. Whyte.
- 8) "Corrosion Causes and Prevention" by F. N. Speller, McGraw Hill Book Company, Inc., New York, 1951, page 195.
- 9) "The Corrosion and Oxidation of Metals" by V. R. Evans, Edward Arnold Publishers, Ltd., London, 1960, page 45.
- 10) Personal communication with Robert Sheppard, Assistant Plant Manager, Divisional Technical Center of Diamond Shamrock Company, Painsville, Ohio.
- 11) SECL-91-313, "Safety Evaluation for Indian Point Unit 3 RWST Boron Increase," Westinghouse Electric Corp.

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TABLE 6E-1
[Historical Information]

EXPOSURE CONDITIONS

Temperature °F	110
Nitrogen Overpressure	Slight positive pressure
Sodium Hydroxide Concentration, w/o	35-38 w/o
Oxygen Concentration – Normal	Nitrogen blanketed
Carbon Dioxide Concentration – Normal	Nitrogen blanketed

TABLE 6E-2
[Historical Information]

COMPONENT MATERIALS

Component	Material
Spray Additive Tank	304 stainless steel cladding on steel A-516 GR-70
Piping	304 stainless steel
Valve Bodies	304 and 316 stainless steel
Valve Seats	Austenitic stainless steel or Stellite
Valve Stems	17-4 PH and 410 stainless steel
Valve Diaphragm	Ethylene-Propylene Dipolymer Nordel Rubber by Dupont

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TABLE 6E-3
[Historical Information]
CORROSION RATES

Material	Temperature (F)	NaOH Concentration, (ppm)	Aeration	Corrosion Rate (mils/yr)	Reference No.
304 S/S	136	22 to 50	Yes	<0.1	1
316 S/S	125	30	Yes	<2	2
Steel	179	30 to 50	Yes	<20	2
410 S/S	125	30	Yes	<2	2
17-4 pH	176	30	Yes	3 to 6	7
Stellite	150	50	Yes	<0.6	4
Nordel Rubber	110	33	Yes	<0.004	5

APPENDIX 6F

ENVIRONMENTAL QUALIFICATION OF ELECTRICAL
EQUIPMENT IMPORTANT TO SAFETY

1. REQUIREMENTS FOR ENVIRONMENTAL QUALIFICATION OF ELECTRICAL
EQUIPMENT

Part 50.49, Title 10, of the Code of Federal Regulations contains the NRC requirements for Environmental Qualification of Electric Equipment important to safety for nuclear power plants. Specifically it defines electric equipment important to safety as:

- “(1) Safety-related electric equipment.* This equipment is that relied upon to remain functional during and following design basis events to ensure (i) the integrity of the reactor coolant pressure boundary, (ii) the capability to shut down the reactor and maintain it in a safe shutdown condition, and (iii) the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the 10CFR Part 100 guidelines. Design basis events are defined as conditions of normal operation including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure functions (i) through (iii) of this paragraph.
- (2) Nonsafety-related electric equipment whose failure under postulated environmental conditions could prevent satisfactory accomplishment of safety functions specified in subparagraphs (i) through (iii) of paragraph (b) (1) of this section by the safety-related equipment.
- (3) Certain post-accident monitoring equipment.**”

* Safety-related electric equipment is referred to as “Class 1E” equipment in IEEE 323-1974.

** Specific guidance concerning the types of variables to be monitored is provided in Revision 2 of Regulatory Guide 1.97, “Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident.”

The regulations further require that equipment must be qualified by one of the following methods.

- “(1) Testing an identical item of equipment under identical conditions or similar conditions with a supporting analysis to show that the equipment to be qualified is acceptable.
- (2) Testing a similar item of equipment with a supporting analysis to show that the equipment to be qualified is acceptable.
- (3) Experience with identical or similar equipment under similar conditions with a supporting analysis to show that the equipment to be qualified is acceptable.

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- (4) Analysis in combination with partial type test data that supports the analytical assumptions and conclusions.”

Regarding Equipment which was qualified prior to issuance of 10CFR50.49, the regulations state:

- “(k) Applicants for and holders of operating licenses are not required to requalify electric equipment important to safety in accordance with the provisions of this section if the Commission has previously required qualification of that equipment in accordance with “Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors,” November 1979 (DOR Guidelines), or NUREG-0588 (For Comment version), “Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment.”
- (1) Replacement equipment must be qualified in accordance with the provisions of this section unless there are sound reasons to the contrary.”

Equipment installed in Indian Point 3 has been qualified in accordance with

- DOR Guidelines
- 10CFR50.49

based on the equipment installation date.

2. SAFETY RELATED SYSTEMS

Regulatory Guide 1.89 Revision 1, dated June 1984, identifies typical safety-related systems that may contain equipment requiring environmental qualification. The systems identified are:

- Engineered Safety Feature Actuation
- Reactor Protection
- Containment Isolation
- Steamline Isolation
- Main Feedwater Shutdown and Isolation
- Emergency Power
- Emergency Core Cooling
- Containment Heat Removal
- Containment Fission Product Removal
- Containment Combustible Gas Control
- Auxiliary Feedwater
- Containment Ventilation
- Containment Radiation Monitoring
- Control Room Habitability System (e.g., HVAC, Radiation Filters)
- Ventilation for Areas Containing Safety Equipment
- Component Cooling
- Service Water
- Emergency Systems to Achieve Safety Shutdown

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The systems installed at Indian Point 3 which are used in whole or in part to accomplish the safety functions identified in Regulatory Guide 1.89, Rev. 1, are:

- Reactor Protection System
- Safety Injection System
- Auxiliary Coolant System
- Chemical and Volume Control System
- Condensate and Boiler Feedwater System
- Ventilation System for Containment, Primary Auxiliary
and Fuel Storage Building
- Service Water System Nuclear Steam Plant Supply
- Nitrogen to Nuclear Equipment
- Sampling System
- Automatic Gas Analyzer System
- Primary Make-Up Water System
- Instrument Air System
- Main Steam System
- Reactor Coolant System
- Hydrogen Recombiner System [Historical Information]
- Steam Generator Blowdown
- Service and Cooling Water System
- Pressurizing & Pressure Relief System
- Emergency Diesel System
- Radiation Monitoring System
- Emergency AC and DC Distribution System
- AC Distribution System
- 125V DC Distribution System

3. DESIGN BASIS EVENTS AND CONDITIONS FOR WHICH ENVIRONMENTAL
QUALIFICATION IS REQUIRED

10 CFR 50.49(b)(1) defines design basis events as follows:

“conditions of normal operation including anticipated operational occurrences, design basis accidents external events, and natural phenomena for which the plant must be designed to ensure functions (i) through (iii) of this paragraph.”

10 CFR 50.49 further states:

“(c) Requirements for (i) dynamic and seismic qualification of electric equipment important to safety, (ii) protection of electric equipment important to safety against other natural phenomena and external events, and (iii) environmental qualification of electric equipment important to safety located in a mild environment are not included within the scope of this section. A mild environment is an environment that would at no time be significantly more severe than the environment that would occur during normal plant operation, including anticipated operational occurrences.”

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The accidents, therefore, which require environmental qualification of electrical equipment installed in Indian Point 3 are:

- Loss of Coolant Accidents (LOCA)
- High Energy Line Breaks (HELB)
- Main Steam Line Breaks (MSLB)

Loss of coolant accidents affect the environmental conditions inside the reactor containment building and in the pipe penetration area, purge valve enclosure area, the safety injection pump room, and the residual heat removal pump room of the Primary Auxiliary Building. High energy line breaks (steam lines and/or feedwater lines) affect the environmental conditions in the steam and feedline penetration area, pipe penetration area, hot penetration blower/chemical feed room, service water chase area (mini-containment), steam generator blowdown recovery heat exchanger room, and in the auxiliary feed pump room. Main steam line breaks inside the reactor containment building affect the environment in the containment building. However, in accordance with DOR Guidelines (Reference 17), the environmental qualifications to LOCA conditions establishes the qualification to LOCA / MSLB conditions inside the vapor containment (VC).

A. Pressure and Temperature in the Reactor Containment Building.

Entergy implemented a Stretch Power Uprate (SPU) for IP3 in 2005 during the refueling outage 3R13, which uprated the core thermal power from 3068 MWt to 3216 MWt (4.84%). The long term loss of coolant accident (LOCA) mass and energy (M&E) releases and containment integrity response were analyzed at the 3216 MWt conditions by Westinghouse (References 24 and 25). The most limiting peak containment pressure / temperature following a postulated long term LOCA M&E release is 42.38 psig / 262.95° F at 1099 seconds resulting from a double-ended pump suction (DEPS) break with minimum safeguards, which is shown on Figure 6F-1.

Figure 6F-1 forms the basis of the postulated pressure and temperature parameters to which equipment inside containment is qualified.

B. Radiation in the Containment Building.

As a result of the Stretch Power Uprate (SPU) discussed above, Entergy performed an analysis (Reference 19) to determine the total integrated doses for safety related electrical equipment at IP3 following a design basis Large Break (LB) LOCA. The radiation source terms used to calculate the doses (gamma and beta) from the VC atmosphere were assumed to be 100% of the noble gases and 50% of the halogens instantaneously released and uniformly mixed in the containment atmosphere. Removal of iodine's by chemical spray and recirculation filtration was accounted for. The gamma ray source terms that were used to calculate doses from the sump water were assumed to be 50% of the halogens and 1% of the remaining nuclides (except noble gases).

The total integrated doses (TID) for gamma and beta on the containment centerline and near the containment wall exposed to the airborne activity within the containment atmosphere were calculated (Table 6F-1). The TID for gamma doses were also computed for a detector located at the surface of a large pool of sump water due to the contaminated water (Table 6F-2).

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C. Effect of LOCA in the Primary Auxiliary Building.

In Indian Point 3 Core Cooling following a LOCA is provided by recirculation of reactor coolant from the containment sump by pumps which are located in the primary auxiliary building outside of the containment boundary. The recirculating coolant contains halogens and other solid fission products and thus causes a radiation field around the piping and equipment containing the coolant. As part of the SPU project, analyses of radiation levels resulting from the recirculating coolant have been performed to determine the dose rate and integrated dose at various locations in the primary auxiliary building (Reference 19). For environmental qualification, the maximum integrated dose (normal + 1 year accident) used for equipment located in the Pipe Penetration Area, the SW Pipe Chase, the Post Accident Sampling Area, the SI Pump Room and the RHR Pump Room are 1.34E+7 rads, 1.34E+7 rads, 3.78E+6 rads, 8.08E+6 rads and 1.6E+7 rads respectively (References 19 & 23).

The dose rate and integrated dose in other areas of the primary auxiliary building are negligible.

D. Effect of Pipe Breaks in the Primary Auxiliary Building.

Reference 3 contains an evaluation of the effects of breaks in various high energy lines located in the primary auxiliary building. The conclusions from Reference 3 indicate that the pressure and temperature in the primary auxiliary building are not significantly more severe than during normal operation. With the exception of Pipe Penetration Area and the SGBD Heat Exchanger Room, the environment due to a high energy line break in the PAB is considered mild.

The effects of breaks in the steam generator blowdown lines in the Pipe Penetration Area and Heat Exchanger Room are analyzed in Reference 9. A break in these areas will be detected by strategically positioned temperature sensors which would provide the permissive to the valve circuitry to isolate such breaks. Therefore, the harsh environment resulting from the above break is of very short duration.

E. Effects of Pipe Breaks in the Steam and Feedline Penetration Area.

The Calculation #IP3-CALC-MS-04025 (Reference 20) determines the temperature profiles in the Steam & Feedline Penetration Area for equipment environmental qualification in support of IP3 SPU to 3216 MWt. The analysis was performed for the steam line break and covers:

- A spectrum of break sizes
- Full (102%) and partial power (70%) conditions
- Steam line break locations (header / loop)
- Summer and winter conditions.

The resultant temperature profiles, which appear on Figure 6F-4 represents a peak temperature scenario of 483.8° F. The peak temperature of 483.8° F exceeds the maximum temperature qualification of most EQ equipment in the building. Therefore, a series of thermal lag analyses (References 11 thru 15) have been performed, which show that the short duration of the peak temperature and the heat sink effects of the equipment housing will prevent the EQ equipment from exceeding qualified temperatures.

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F. Effects of Pipe Breaks in the Auxiliary Feed Pump Room.

Reference 21 contains the results of analyses of breaks in the four-inch steam supply pipe to the turbine driven pump. This break is sensed by redundant, environmentally qualified temperature switches. Once the temperature switches reach the steam isolation valve setpoint of 150° F, the steam supply isolation valves (MS-PCV-1310A and -1310B) are fully closed within five seconds. These air operated valves are normally supplied with Instrument Air and have a permanently installed backup Nitrogen bottle supply. Figure 6F-9B shows the pressure and temperature profile resulting from a break in the 4-inch steam line.

G. Submergence

10CFR50.49 requires that the equipment qualification program include and be based on submergence if the equipment is subject to being submerged. At Indian Point 3, the liquid level inside containment after a worst case Loss-of-Coolant-Accident would be at elevation 50 feet, 1.5 inches maximum (Reference 7). This level corresponds to a depth of 4 feet 1.5 inches.

The Safety-related equipment which would be subject to submergence are some electrical cables and splices. Figure 6F-1 shows the temperature and pressure profiles to which the cables and splices would be subjected.

The sump chemistry is determined primarily by the chemistry of the primary coolant and refueling water storage tanks and buffer. Initially the containment spray will be boric acid solution from the refueling water storage tank (RWST), which has a pH level of 4.6. Subsequently, the recirculation solution comes in contact with the sodium tetraborate and the sodium tetraborate raises the pH of the sump solution. The resulting composition for Indian Point 3 would be 2400-2600 ppm Boron (as H_3BO_3) buffered to a pH of 9-10 by 35%-38% Sodium Hydroxide (NaOH) for the original buffer additive and 7.1 – 7.4 for the current buffer additive sodium tetraborate (Reference 22). There is a negligible effect on sump chemistry as a result of discharge of the accumulators and the boron injection tank because of the small volume of liquid associated with these units. The other constituents of the sump are ppm quantities of solid fission products, iodine, and materials washed from containment surfaces as a result of the containment spray.

4. EQUIPMENT REQUIRING ENVIRONMENTAL QUALIFICATION

A listing of equipment installed in Indian Point 3 which is located in areas subject to harsh environmental parameters as a result of LOCA or HELB and is required to function in such a harsh environment is documented in Reference 8, "Master List of Electrical Equipment to be Environmentally Qualified." Reference 8 contains the equipment identification number, the location, the system in which the equipment is installed and the function of the equipment. The equipment listed in Reference 8 was identified as a result of reviews of system diagrams, emergency operating procedures, and electrical schematic diagrams.

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5. DEMONSTRATION OF ENVIRONMENTAL QUALIFICATION OF EQUIPMENT

EQ files are maintained at Indian Point 3 containing all the documents necessary to demonstrate that the equipment listed in Reference 8 is qualified for the accident environments to which the equipment can be subjected. The files also contain documentation which describes how the equipment is maintained to ensure qualified status throughout its installed life.

The change in pH buffer from sodium hydroxide to sodium tetraborate was evaluated by Reference 28 for impact on existing equipment qualifications for IP3 EQ components. The report determined that EQ components that were qualified for a sodium hydroxide buffered boric acid solution remained qualified for a sodium tetraborate buffered boric acid solution.

6. REFERENCES

- 1) Office of Nuclear Reactor Regulation Safety Evaluation Report for Indian Point Nuclear Power Station.
Unit No. 3; Environmental Qualifications of Safety-Related Electrical Equipment USNRC, 21-May-81.

2) [Deleted]

- 3) Analysis of High Energy Lines, Indian Point 3, Docket No. 50-286, Consolidated Edison Company, 09-May-73.

4) [Deleted]

5) [Deleted]

6) [Deleted]

- 7) Report NSE-80-03-029-WDS-1, Rev. 1, "Evaluation of Post Accident Flooding in Containment Building Indian Point Unit 3."

- 8) Master List of Electrical Equipment to be Environmentally Qualified.

- 9) SE Report 860225-1, April 1987, Investigation of High Energy Line Break in the Steam Generator Blowdown Line in both the Pipe Penetration Area and Heat Exchanger Room of IP3.

10) [Deleted]

- 11) Entergy Calculation IP3-CALC-MS-03667, Rev. 1

- 12) Entergy Calculation IP3-CALC-MS-03639, Rev. 1

- 13) Entergy Calculation IP3-CALC-MS-03696, Rev. 1

- 14) Entergy Calculation IP3-CALC-MS-03698, Rev. 1

- 15) Entergy Calculation IP3-CALC-MS-03697, Rev. 1

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16) [Deleted]

17) DOR Guidelines (79-01B), "Guidelines for Evaluating Environmental Qualification of Class 1E Electrical Equipment in Operating Reactors."

18) [Deleted]

19) Entergy Calculation No. IP-CALC-05-00642, "Impact of Power Uprate on Radiation Environments in EQ Zones", (SWEC Calc #59379-RU(S)-002 Rev. 1).

20) Entergy Calculation No. IP-CALC-MS-04025, "Indian Point Unit 3 Uprate Program Outside Containment Analysis with GOTHIC."

21) Entergy Calculation No. IP-CALC-07-00210, "Pressure and Temperature Response from High Energy Line Break in the Auxiliary Feedwater Pump Room."

22) Entergy Report No. IP-RPT-08-00025, Rev. 0 (Contains Westinghouse Evaluation LTR-CDME-08-19, "Evaluation of IP2 & IP3 Post-LOCA Buffered Borate Sump Chemistry for EQ").

23) Engineering Memorandum from Rad Engineering, IP-RES-98-131, "Dose Rates in Specific Area – Normal vs. LOCA" (EQ-GC-99.198.423)

24) CN-CRA-11-34, Revision 1, "Indian Point Unit 3 (INT) Loss of Coolant Accident (LOCA) Mass and Energy (M&E) Reanalysis for NSAL-11-5 Issues and Containment Peak Pressure – Margin Recovery," March 2012

25) LTR-CRA-12-217, Revision 0, "Indian Point Unit 3 – Peer Reviewed LOCA M&E and Containment Analysis for Changes in ECCS recirculation flow and CCW system performance," December 2012

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Table 6F-1

Gamma TID (rad) After LB LOCA in the Containment

Time (Hr)	Containment Center	Containment Near the Wall
0	0	0
0.5	3.47E+05	9.46E+04
1	5.72E+05	1.58E+05
2	9.46E+05	2.59E+05
4	1.49E+06	4.09E+05
8	2.18E+06	5.96E+05
12	2.61E+06	7.17E+05
24	3.45E+06	9.47E+05
36	4.00E+06	1.10E+06
48	4.42E+06	1.22E+06
72	5.07E+06	1.41E+06
120	6.03E+06	1.68E+06
360	8.24E+06	2.31E+06
720	8.92E+06	2.50E+06
1440	9.06E+06	2.54E+06
4380	9.09E+06	2.55E+06
8760	9.12E+06	2.56E+06

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Table 6F-2

Gamma TID (rad) After LB LOCA at the Containment Sump

Time (Hr)	Sump Water	Sump Surface Water
0	0	0
0.5	3.91E+05	2.45E+05
1	7.30E+05	4.58E+05
2	1.32E+06	8.25E+05
4	2.25E+06	1.41E+06
8	3.71E+06	2.32E+06
12	4.96E+06	3.09E+06
24	7.98E+06	4.98E+06
36	1.04E+07	6.50E+06
48	1.25E+07	7.80E+06
72	1.60E+07	9.95E+06
120	2.11E+07	1.31E+07
360	3.18E+07	1.97E+07
720	3.64E+07	2.26E+07
1440	4.01E+07	2.48E+07
4380	4.70E+07	2.91E+07
8760	5.26E+07	3.26E+07

Table 6F-3

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Table 6F-4

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