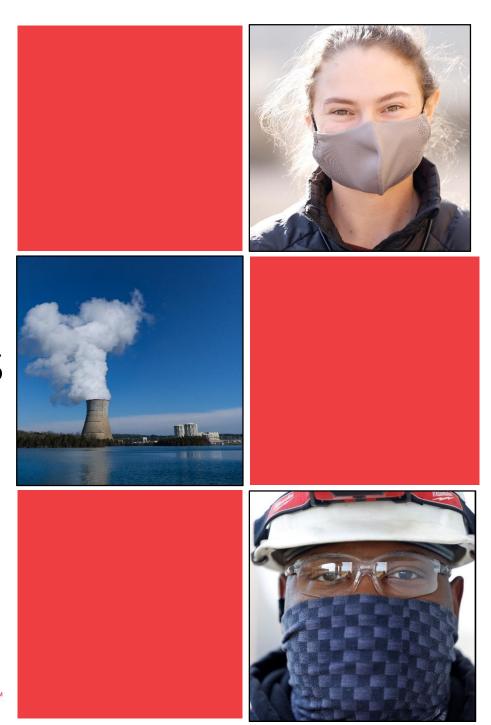


Pre-Submittal Meeting
ANO-1 LAR Related to RCS
Primary Activity and
Primary-to-Secondary
Leak Rate

April 8, 2021



Agenda

- Introductions
- Purpose
- Background
- Methodology and Inputs
 - Dose Models
 - Source Term
- Preliminary Results
 - Proposed Technical Specification Values
 - Preliminary Dose Results
- Conclusions
- CLOSED SESSION
 - Thermal Hydraulic Model
 - Determination of Flashing Fraction

Purpose

Discuss the proposed changes to the ANO-1 Technical Specifications (TS) for RCS activity and Primary-to-Secondary leakage.

- These changes are the result of a proposed revision to the steam generator flashing fraction due to the identification of a nonconservative TSs in 2018.
- Describe how the proposed flashing fraction was determined and the subsequent impacts to applicable technical specifications.

Background

- Current Technical Specification (TS) Values
 - TS 3.4.12 Dose Equivalent Iodine

< 60 µCi/gm

- TS 3.4.12 RCS I-131 Primary Activity

 $< 1.0 \mu Ci/gm$

- TS 3.4.13 RCS Primary-to-Secondary Leak Rate
 150 gallons per day
- Based on the use of Alternate Source Term (10 CFR 50.67)
- Approved in October 2009

Background (continued)

- October 2018, it was identified that the offsite dose consequences for the ANO-1 Steam Generator Tube Rupture (SGTR) event were non-conservative.
 - Failed to consider post-trip High Pressure Injection (HPI) flows during event.
 - Maintains Reactor Coolant System (RCS) pressure at a higher level, leading to a higher primary-tosecondary leak rate.
 - Extends timing to isolate the ruptured SG
 - Potential higher release

Background (continued)

- While working to resolve the issue, it was identified that a potentially non-conservative value was used for the "flashing fraction".
 - "Flashing fraction" is the fraction of the RCS leakage that vaporizes when it enters the secondary, rather than entering the SG liquid.
 - Same flashing fraction was used in the Main Steam Line Break (MSLB) and Rod Ejection events dose analyses.
 - ANO-1 took compensatory measures to limit the RCS Primary Activity and Primary-to-Secondary leak rate to bring the potential dose consequences under the acceptance criteria in accordance with current NRC guidance based on using a flashing fraction of 100%.

Methodologies and Inputs

- Dose Analyses performed with RADTRAD
 - Maintained the previous release points
 - Maintained the previous X/Qs
 - ANSI 18.1 Source Term
 - Revised Thermal-Hydraulics
 - Revised flashing fraction
- Thermal-Hydraulics analysis revised using RELAP5/MOD2-B&W
- New flashing fraction determined using Computational Fluid Dynamics (CFD) and heat transfer calculation methods.

Source Term

- For SGTR and MSLB, using ANSI 18.1
 - With no event-induced fuel failures, just the RCS source term.
- For Rod Ejection, maintaining the source term
 - The Rod Ejection event induces fuel failures

Thermal-Hydraulic Model (closed)

- Modeled with RELAP5/MOD2-B&W, performed by Framatome
- Doubled-ended tube rupture at full power
- Loss of offsite power upon reactor trip
 - 9.6 minutes for early trip case (makeup/letdown mismatch), 21.6 minutes for delayed trip
- Assumptions:
 - No operator actions until 20 minutes after tube rupture
 - Single failure of ADV Block Valve on Unaffected SG
 - Operator dispatched, opened at 70 minutes

- A flashing fraction of 40% of the flow from the ruptured tube at 4 minutes after the scram in the SGTR event
- A flashing fraction of 100% everywhere else in all other analyses.
- Limiting values
 - RCS Dose Equivalent Iodine (DEI) 24 μCi/gm (60 μCi/gm)
 - RCS Primary Activity 0.25 μCi/gm (1.0 μCi/gm)
 - Primary-to-Secondary Leak Rate 39 gallons per day (gpd) per steam generator (150 gpd)

SGTR

- Pre-Existing Spike:
 - Exclusion Area Boundary (EAB)
 - Low Population Zone (LPZ)
 - Control Room (CR)
- Accident-Induced Spike:
 - EAB
 - LPZ
 - CR

- 6.1 rem TEDE
- 1.0 rem
- 4.8 rem
- 2.48 rem TEDE
- 0.41 rem
- 1.38 rem

MSLB

- Pre-Existing Spike:
 - EAB

0.32 rem TEDE

LPZ

0.18 rem

• CR

- 1.08 rem
- Accident-Induced Spike:
 - EAB

1.26 rem TEDE

LPZ

0.72 rem

• CR

2.55 rem

- CEA Ejection
 - EAB3.3 rem TEDE
 - LPZ2.2 rem
 - CR 4.95 rem

- Locked Rotor
 - EAB0.7 rem TEDE
 - LPZ
 0.5 rem
 - CR 1.1 rem

Conculsions

- Revised TS values
 - TS 3.4.12 DEI

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< 24 \mu \text{Ci/gm} (< 60 \mu \text{Ci/gm})
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- TS 3.4.12 RCS I-131 Primary Activity
 - $< 0.25 \mu \text{Ci/gm} (< 1.0 \mu \text{Ci/gm})$
- TS 3.4.13 RCS Primary-to-Secondary Leak Rate39 gpd (150 gpd)

Schedule

 LAR submittal expected by the end of April 2021

 Standard approval timeframe requested (13 months)

CLOSED SESSION