

# Regulatory requirements with respect to Spent Fuel Pool Cooling

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#### **Important Documents**

- "Safety Requirements for Nuclear Power Plants" (SiAnf), 22.11.2012, updated 03.03.2015
- "Interpretations of the 'Safety Requirements for Nuclear Power Plants" (SiAnf Interpretations), 29.11.2013, updated 03.03.2015
- "Heat Removal Systems for Fuel Assembly Storage Pools in Nuclear Power Plants with Light Water Reactors", (KTA 3303, 2015-11), 08.01.2016
- "Requirements for spent fuel pool cooling" (RSK 2015), Recommendation of the German Reactor Safety Commission, 09.12.2015

This presentation represents a personal view of the author and does not necessarily represent any official position (BMUB, RSK)

#### Background

- Introduction of new requirements with respect to spent fuel pool (SFP) cooling by SiAnf in 2012
- During amendment of KTA 3303, questions arose concerning the interpretation of SiAnf requirements
- BMUB asked RSK to clarify SiAnf requirements and their technical implementation:
  - Maintenance of redundancies of spent fuel pool cooling system (FPC) during fuel assembly storage (operational mode F according to SiAnf)?
  - Best operational modes for maintenance of FPC?
  - Further need for clarifications of SiAnf requirements, especially with respect to events of level of defence 3 (LoD 3)?

#### **FPC in German BWRs**

- Two operational trains (not part of the safety system)
  - Not designed against earthquakes or rare man-made external hazards
  - 100% capacity in all operational phases (A-F) for events of LoD 3
- Three trains of the residual heat removal system
  - One train for direct SFP cooling
  - All three trains for indirect SFP cooling (via pressure suppression pool)
  - 100% capacity in all operational phases
- Under specific circumstances: cooling with additional cooling system (ZUNA) possible
- → in general more trains available than in PWRs, thus in the following focus only on PWRs

#### **FPC in German PWRs**

- Three trains
  - 2 trains as part of residual heat removal / emergency cooling system
    - with two parallel pumps each train
    - emergency power supply by D1 or D2
    - 100% capacity in all operational phases (A-F) for all events of LoD 2 and 3
  - 3rd train for SFP cooling, especially during LOCA
    - Not part of the safety system
    - Not designed against earthquakes or rare man-made external hazards
    - Emergency power supply possible by redundancies 2 or 3 of D1
    - Depending on plant: less than 100% capacity
- RSK accepts crediting operational train for events of LoD 3, if reliable fuction under event specific circumstances is demonstrated

#### Requirements with respect to SFP cooling

#### Before SiAnf:

 German "single failure concept" (single failure + unavailability of a safety equipment due to maintenance measures) not fully applied to FPC

#### SiAnf:

- New list of events to be considered, including events on LoD 3
- Application of the "single failure concept" to FPC
- Focus on event B3-01 but other events also important to answer questions of BMUB

#### SiAnf, Annex 2, Table 5.3: Event list fuel storage PWR/BWR

- LoD 3: Reduced heat removal from the spent fuel pool
- B3-01: Loss of two trains of the spent fuel pool cooling system for a longer period (> 30 min.)
  - Fundamental safety functions concerned: Cooling
  - Acceptance targets:
     Limitation of the spent fuel pool water temperatures to values below the design temperature of the pool (T<sub>3</sub>) for ensuring its integrity
  - Operational mode: A-F
  - Additional boundary condition:
     For the safety demonstration, grace times and repair possibilities might be taken into account for all operational modes

### SiAnf Interpretations, I-5: Requirements for structures, systems and components

- Chapter 5: Event-specific requirements relating to event B3-01
  - The event sets in
    - with the failure of a train currently in operation
    - during the unavailability of a second train due to maintenance measures
- No 'common mode' failure of more than one train

### SiAnf, Annex 4: Principles for applying the single failure criterion and the maintenance

- 2.2.3: Redundancy requirements for equipment of LoD 3
  - For the safety equipment required to cope with events on LoD 3, a single failure generally combined with a maintenance case shall be postulated when demanded (degree of redundancy n+2).
- 2.3: Redundancy requirements for safety-relevant equipment during operational modes phases C to F
  - 2.3(2): A degree of redundancy n+0 is permissible in the operational modes E and F if in case of a loss of function of the safety-relevant equipment,
    - relevant acceptance criteria are not exceeded within 10 hours and
    - the active safety-relevant equipment failed or being under maintenance can be made functional within this time frame.

## SiAnf Interpretations, I-5: Requirements for structures, systems and components

- Chapter 4: Requirements for the application of the single-failure concept
  - According to 4.1, for the installations for SFP cooling, SiAnf, Annex 4, 2.3
     (2) also applies to the operating phases A to D
  - 4.1 further notes:

"Operating experience has shown that it is possible to make at least one FPC train available

- within 10 hours
- if sufficient maintenance resources (sufficient and qualified maintenance personnel, stocks of spare parts, etc.) are provided at the plant."

#### **B3-01: First Results**

- For B3-01,
  - failure of a train currently in operation together with
  - unavailability of a second train due to maintenance measures and
  - a single failure

may result in a complete loss of active SFP cooling

- Making at least one train available can be credited if
  - relevant acceptance criteria (here: T<sub>3</sub>) are not exceeded within 10 hours and
  - sufficient maintenance resources (sufficient and qualified maintenance personnel, stocks of spare parts, etc.) are provided at the plant.

#### RSK Recommendation 1a/b

- Preventive maintenance leading to the unavailability of one train of the FPC should only be performed, if the time until T<sub>3</sub> is reached (after an event takes place, taking into account a single failure) is longer than 10 hours
- During preventive maintenance, sufficient maintenance resources (sufficient and qualified maintenance personnel, stocks of spare parts, etc.) have to be ensured
- Only in individual cases and for substantial reasons preventive maintenance may be performed even if T<sub>3</sub> may be reached in less than 10 hours. In these cases, specific conditions have to be met (compare RSK 2015)

#### RSK Recommendation 1a/b

- Further Remarks:
  - If temperature remains below T<sub>3</sub> due to remaining active SFP cooling even after an event (loss of one train, preventive maintenance in a second train, single failure in a third train), preventive maintenance is not restricted
  - Servicing (according to SiAnf Annex 4, 3.3.2) is permitted, if available time until T<sub>3</sub> may be reached is considerably longer than the time needed to bring equipment back to functionality
- Operational modes adequate for preventive maintenance of FPC must be chosen under consideration of other events (LOCAs, hazards ...)

#### **B3-01: Additional Results**

- Apart from preventive maintenance, also unplanned maintenance (repair) has to be considered
- B3-01 may result in a complete loss of active SFP cooling during planned as well as unplanned maintenance of FPC
- According to SiAnf, Annex 4, 2.2.3, for comparable situations
  - maintenance shall be sufficiently restricted in time and
  - the permissible unavailability shall be specified in the operational documentation
- To be able to credit repair of at least one train within 10 hours
  - sufficient maintenance resources (sufficient and qualified maintenance personnel, stocks of spare parts, etc.) have to be provided

#### **RSK Recommendation 2**

- Requirements with respect to FPC availability and measures in case of unplanned maintenance have to be covered by the operational documentation
- In case of unplanned maintenance, sufficient maintenance resources (sufficient and qualified maintenance personnel, stocks of spare parts, etc.) have to be ensured in due time

#### **B3-01: Further Results**

- Formally, B3-01 is defined as taking place during times of maintenance (according to SiAnf Interpretations)
- Nevertheless, also for times without maintenance,
  - failure of a train currently in operation together with
  - a single failure

should be considered

- Without maintenace (planned or unplanned), at least one train will remain available
- In some plants, not all trains have 100% capacity
  - $\rightarrow$  even with one train available, T<sub>3</sub> may be reached

#### **RSK Recommendation 3**

 Operating conditions without maintenance, in which T<sub>3</sub> may be reached within 10 hours (even with a remaining train), have to be excluded

#### Further Remarks

 If with a remaining train, T<sub>3</sub> will not be reached within 10 hours, but may be reached afterwards, sufficient maintenance resources (sufficient and qualified maintenance personnel, stocks of spare parts, etc.) have to be provided

### Further events of LoD 3 — Loss of coolant from SFP: B3-02 to B3-04

- For B3-02 to B3-04,
  - Loss of a train due to leaks together with the
  - unavailability of a second train due to maintenance measures and
  - a single failure

may result in a complete loss of active SFP cooling

- → see Recommendations 1-3
- Furthermore, loss of coolant from SFP may result in short term loss of active cooling functions, until
  - leak is isolated and
  - coolant is added

#### RSK Recommendation 4 and 5

- For events with loss of coolant from SFP
  - measures and equipment for sufficiently fast isolation of leak have to be provided and
  - during fuel unloading it has to be ensured, that for events with total loss of active SFP cooling, time to reach T<sub>3</sub> is longer than time needed to
    - isolate the leak and
    - add coolant to restart active SFP cooling
    - taking into account the reduced SFP inventory
- During maintenance work on FPC, piping from SFP should be sealed by two isolation valves (or equivalent measures and equipment)

#### External events: Design basis earthquake

- Only two trains of FPC designed to be operational after design basis earthquake (DBE)
- Due to single failure concept, DBE may result in a complete loss of active SFP cooling
- → see Recommendations 1-3
- To be able to credit repair of at least one train within 10 hours
  - sufficient maintenance resources (sufficient and qualified maintenance personnel, stocks of spare parts, etc.) have to be provided

#### **RSK Recommendation 6**

- If just one train designed against earthquake is available due to maintenance (planned or unplanned)
  - sufficient maintenance resources (sufficient and qualified maintenance personnel, stocks of spare parts, etc.) have to be provided
  - that remain available under the specific circumstances of DBEs.



### Vielen Dank für Ihre Aufmerksamkeit! Thank you for your attention!

Haben Sie noch Fragen?
Do you have any questions?

