ALLIANT ENERGY.

2 03

February 7, 2000 NG-00-0111 Alliant Energy Corporation Alliant Tower 200 First Street SE P.O. Box 351 Cedar Rapids, IA 52406-0351

Office: 319.398.4411 www.alliant-energy.com

Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Attn: Document Control Desk Mail Station 0-P1-17 Washington, DC 20555-0001

Subject:	Duane Arnold Energy Center
5	Docket No: 50-331
	Op. License No: DPR-49
	Relief Requests NDE-028, Revision 1 and MC-R008;
	RRF-F002 Flaw Evaluation
References:	1. Letter dated October 19, 1999, from NRC to E. Protsch (IES
	Utilities Inc.), Safety Evaluation for the Proposed Alternative to
	ASME XI Requirements for Containment Inservice Inspection for the
	Duane Arnold Energy Center
	2. Letter dated October 18, 1999, from NRC to E. Protsch (IES
	Utilities Inc.), Safety Evaluation of Third 10-Year Interval Inservice
	Inspection Program Plan Requests for Relief for Duane Arnold
	Energy Center
	3. Licensee Event Report (LER) 1999-006, dated December 6, 1999,
	Indications in Recirculation Riser Nozzle-to-Safe End Welds
File:	A-100, A-286

By Federal Register Notice dated August 8, 1996 (61 Federal Register 41303), the NRC amended 10CFR50.55a to incorporate by reference the 1992 Edition with 1992 Addenda of Subsection IWE of Section XI of the ASME Boiler and Pressure Vessel Code. Subsection IWE provides requirements for inservice inspection (ISI) of Class MC (metallic containments). Reference 1 approved Duane Arnold Energy Center (DAEC) Containment Inspection Program Relief Requests MC-R002 through MC-R007, MC-P001 and NDE-R015, Revision 1.

While performing inspections during Refueling Outage (RFO) 16, IES Utilities identified the need for an additional Containment Inspection Program Relief Request. A section of well water piping located near a drywell stabilizer prevents the removal of the bolting associated with the stabilizer. As discussed in attached Relief Request MC-R008, performance of the Code-required visual examination would have a disproportionate impact on expenditures of plant manpower and radiation exposure with only a small potential for increasing plant safety margins.

February 7, 2000 NG-00-0111 Page 2

IES Utilities also requests approval of Revision 1 to Inservice Inspection (ISI) Program Relief Request NDE-R028. NDE-R028 was approved by Reference 2 and allows relief from performing 100% examinations of nozzle-to-vessel welds. NDE-R028 was revised to include additional welds that were examined during RFO 16. The relief request was also updated to refer to the latest revision of Regulatory Guide 1.147. The "List of Nozzle-to-Vessel Welds" in the relief request was modified to include the period in which each weld was examined. As discussed in the attached relief request, the configurations of the nozzle-to-vessel welds do not allow 100% examination. Pursuant to the provisions of 10CFR50.55a, IES Utilities requests approval of Relief Requests MC-R008 and NDE-R028, Revision 1 prior to March 1, 2001.

Reference 3 informed the NRC of indications identified in three recirculation riser nozzle-tosafe end welds during RFO 16. The indications in two of the welds were found to be indicative of intergranular stress corrosion cracking (IGSCC) and were repaired with weld overlays. The indication reported in weld RRF-F002 was determined to be a subsurface flaw, was evaluated under the ASME Code and was determined to be acceptable to leave as-is. In accordance with the Code (IWB-3134), the analytical evaluation performed on the subsurface flaw is included as Attachment 2.

Should you have any questions regarding this matter, please contact this office.

Sincerely

Kenneth E. Peveler Manager, Regulatory Performance

Attachment 1: Relief Requests MC-R008 and NDE-R028, Revision 1 Attachment 2: Flaw Evaluation for RRF-F002

cc: C. Rushworth (w/a) E. Protsch (w/o) D. Wilson (w/o) G. VanMiddlesworth (w/o) B. Mozafari (NRC-NRR) (w/a) J. Dyer (Region III) (w/a) NRC Resident Office (w/a) Docu (w/a)

RELIEF REQUEST NUMBER: MC-R008

COMPONENT IDENTIFICATION

Code Class:	MC
References:	Table IWE-2500-1
Examination Category:	E-A
Item Number:	E1.12
Description:	Limited Examination
Component Numbers:	Drywell Stabilizer X-58A

CODE REQUIREMENT

2. 44

ASME Section XI, 1992 Edition, 1992 Addenda, IWE-2500-1 requires the VT-3 visual examination be performed on 100% of the accessible areas each interval.

BASIS FOR RELIEF REQUEST

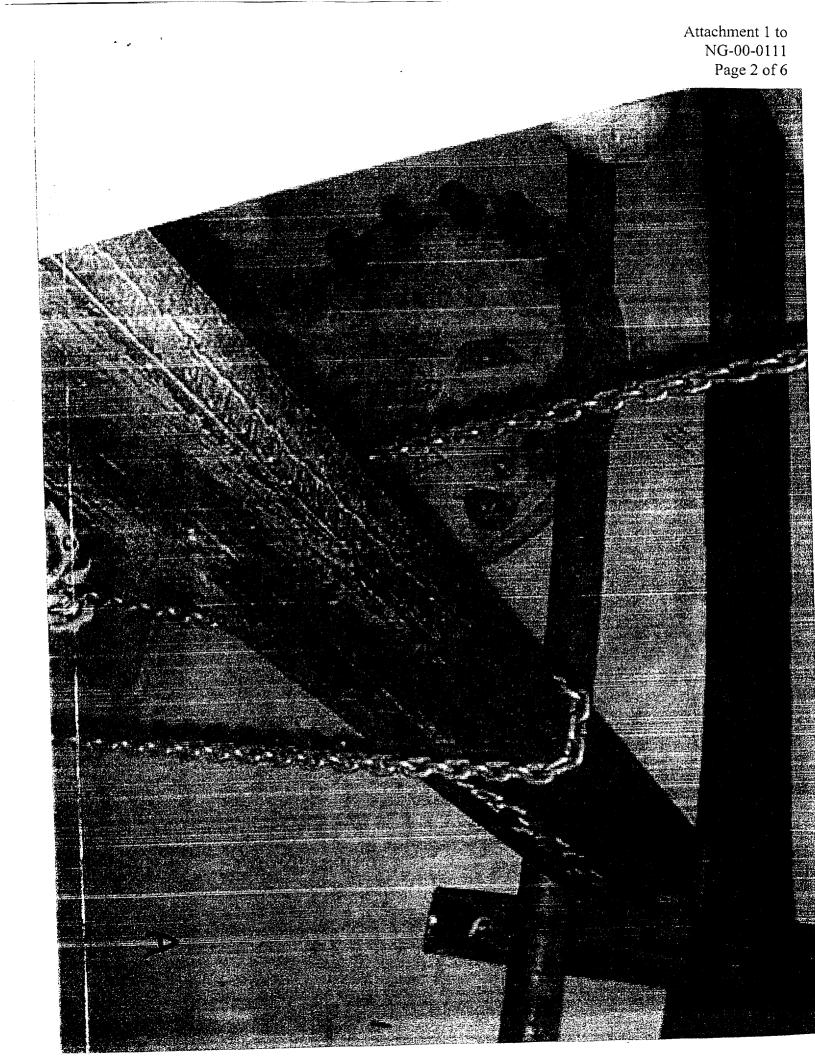
During RFO 16, the Drywell Stabilizer X-58A with the associated bolting was scheduled for examination. It was discovered that the well water piping associated with the 7A cooler prohibited the removal of the bolting. Without removal of the bolting, the integral attachment and the associated reinforcing structure cannot be examined. (See attached photos). In order to perform the VT-3 visual examination, the well water piping would need to be cut and re-welded into place. This would require draining of the well water system, hot work permit, welding, and additional personnel exposure to complete the work. Based on dose measurements obtained during work activities during RFO 16, dose rate in the general area is about 28 to 50 mr per hour. Allowing 8 person-hours to perform the aforementioned activities, the total dose would be approximately 300 millirem. Examination of the Drywell Stabilizer X-58A, which includes the reinforcing structure and the integral attachment to the outside diameter (OD) of the Drywell, has only a small potential of increasing plant safety margins and a very disproportionate impact on expenditures of plant manpower and radiation exposure.

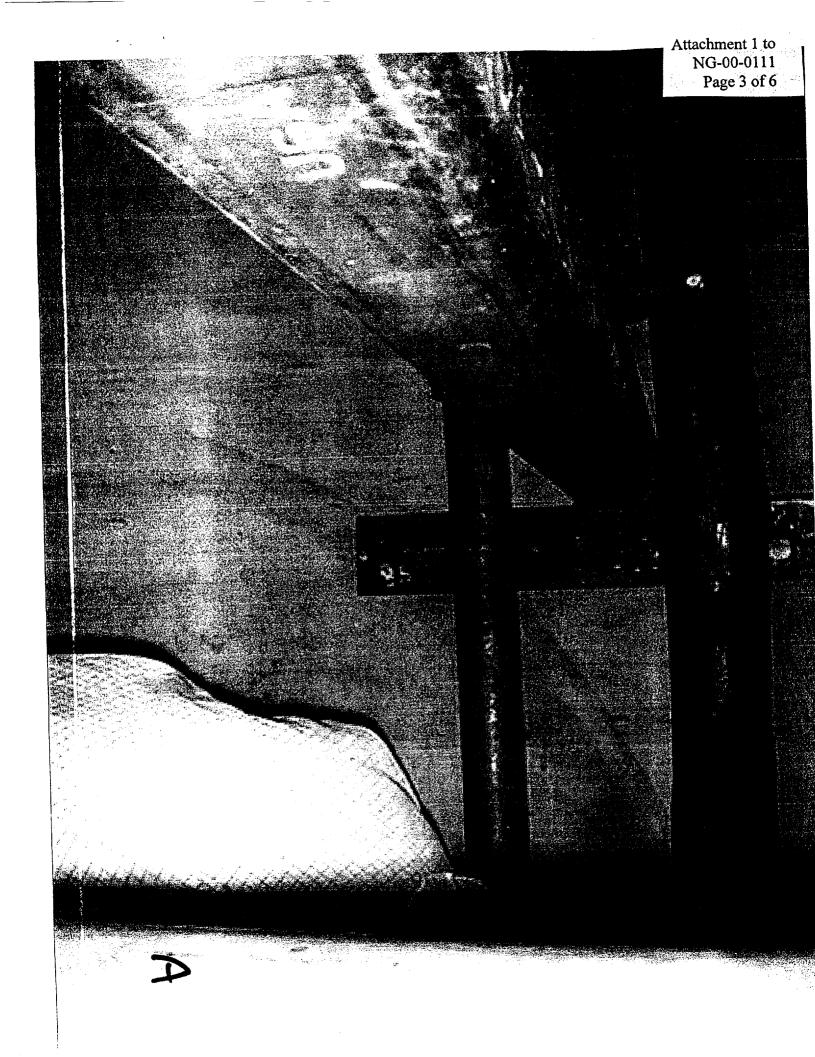
ALTERNATIVE EXAMINATION(S):

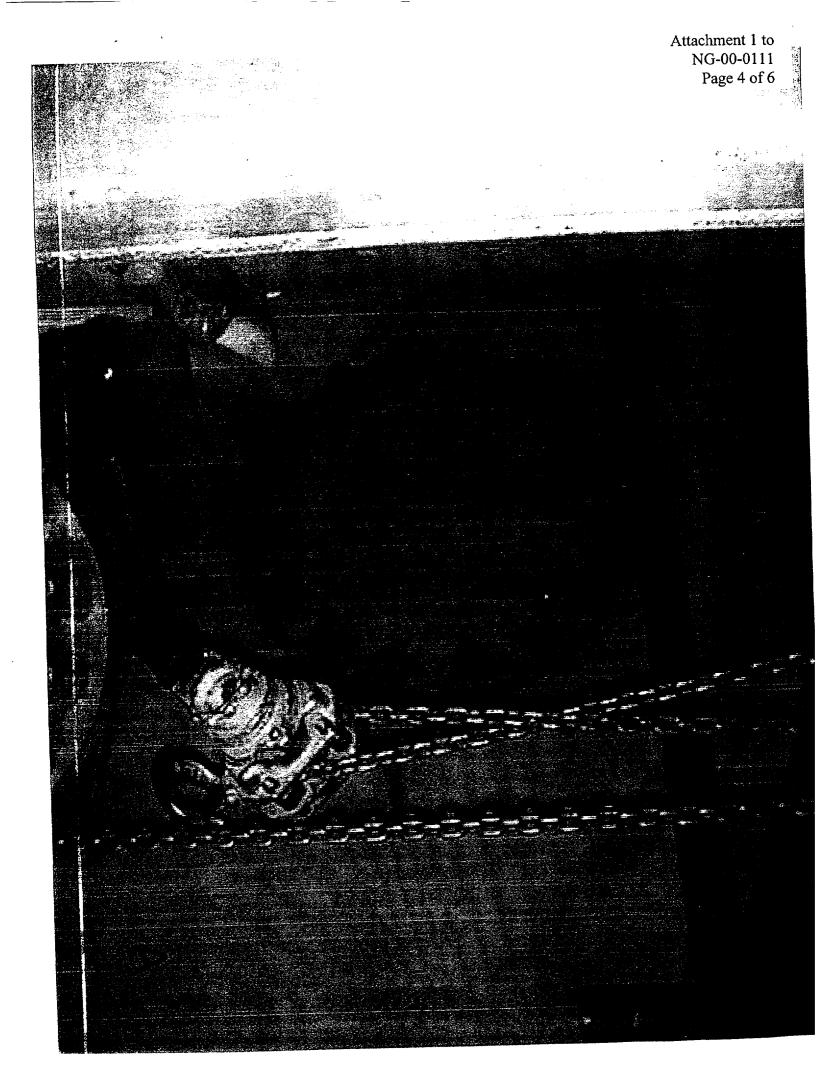
Pursuant to 10CFR 50.55a(a)(3)(ii), the DAEC requests relief from the VT-3 visual examinations of the reinforcing structure and integral attachment of the Drywell Stabilizer X-58A. Once per period, the General Visual Examination of the accessible surfaces will be performed. Once per interval, the associated bolting will be examined in-place under tension as allowed by Relief Request MC-R003.

APPLICABLE TIME PERIOD

Relief is requested for the first ten year interval of the Containment Inspection Program for the DAEC.







RELIEF REQUEST NUMBER: NDE-R028, REVISION 1

COMPONENT IDENTIFICATION

Code Class:	1
References:	IWB-2500
	Table IWB-2500-1
Examination Category:	B-D
Item Number:	B3.90
Description:	Nozzle-to-Vessel Welds
Component Numbers:	See "List of Nozzle-to-Vessel Welds" for Component
-	Identification

CODE REQUIREMENT

Section XI (1989 Edition), Table IWB-2500-1 Category B-D, Item B3.90, requires a volumetric examination, which includes essentially 100% of the weld, once during the ten year interval. The examination volume is defined in Figure IWB-2500-7(b).

Code Case N-460 permits a reduction in examination coverage of Class 1 welds provided the coverage reduction is less than 10%. The Duane Arnold Energy Center (DAEC) has adopted Code Case N-460 in the Inservice Inspection (ISI) Program Plan, as permitted by USNRC Regulatory Guide 1.147, Revision 12.

Relief is requested from performing essentially 100% of the weld length for those welds identified in the "List of Nozzle-to-Vessel Welds."

BASIS FOR RELIEF

Due to the design of these welds it is not feasible to effectively perform a volumetric examination of 100% of the volume as described in IWB-2500-7(b). The nozzle-to-vessel welds are accessible from the vessel side, but examination cannot be performed from the nozzle side because of the forging curvature. In addition to component configuration certain nozzle-to-vessel weld examinations are further limited by reactor pressure vessel (RPV) design obstructions (such as RPV appurtenances). In accordance with 10CFR 50.55a(6)(i) relief requests may be granted when the examination requirements are shown to be impractical.

ALTERNATE EXAMINATION

The DAEC proposes to perform volumetric examination from the vessel side of the nozzle-tovessel welds identified in the "List of Nozzle-to-Vessel Welds." Because of the design of these welds, there are no alternative examination techniques currently available to increase the examination volume.

Attachment 1 to NG-00-0111 Page 6 of 6

Nozzle ID	Period Examined	Code Coverage*	Remarks
CRA-D001	1	61.3%	Control Rod Drive
CSA-D001	1	63%	Core Spray
CSB-D001	1	66%	Core Spray
FWA-D001	1	56.5%	Feedwater
HVA-D001	1	66.0%	Head Vent
JPA-D001	1	61.1%	Jet Pump
MSA-D001	1	59.6%	Main Steam
MSB-D001	2	63%	Main Steam
RHA-D001	1	65.7%	Head Spray
RCA-D001	2	59%	Recirculation Suction
RCB-D001	1	57%	Recirculation Suction
RRA-D001	1	63%	Recirculation Inlet
RRB-D001	1	63%	Recirculation Inlet
RRC-D001	1	63%	Recirculation Inlet
RRD-D001	1	51.4%	Recirculation Inlet
RRE-D001	1	64%	Recirculation Inlet
RRH-D001	1	64%	Recirculation Inlet
VID-D001	2	63%	Vessel Instrumentation
VIE-D001	1	66%	Vessel Instrumentation

List of Nozzle-to-Vessel Welds

*Due to the nozzle design it is not feasible to effectively exam 100% of the required code volume as defined in Figure IWB-2500-7(b).

APPLICABLE TIME PERIOD

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Relief is requested for the third ten-year interval of the Inservice Inspection Program for DAEC.

Attachment 2 to NG-00-0111 Flaw Evaluation for RRF-F002

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ENGINEERING CALCULATION COVER SHEET

IES UTILITIES INC.

DUANE ARNOLD ENERGY CENTER

Calculation Number (If Required): AR 17482

Calculation Title: EVALUATION OF FLAW IN RECIRCULATION INLET NOZZLE N2F

Project Description: REACTOR PRESSURE VESSEL RECIRCULATION NOZZLE (Include Structure, System or Component)

Reference Documents:	AR 17482		DDC	ECP/PMP
	Other			
			<u></u>	
Method of Verification:		Desi	gn Review	Alternate Calculation Qualification Testing

4				
3				
2				
1 -	Mr. Am "/2019	Dave Lemm "/20/99 Verified/Date	March Zlister 11	20-99
Revision	Prepared/Date	Verified/Date	Approved/Date	
.]

NG-007Z Rev 7

DESIGN VERIFICATION SUMMARY REPORT

	Sheet	/ of 2	•
DOCUMENTTYPE/NUMBER: AR 17482 VERIFIER: Dave Lemm	REVISION DISCIPLINE:	/ Mechanical	
METHOD OF VERIFICATION:			
DESIGN REVIEW		ALIFICATION TESTING	I
Design Inputs Considered: Stress Report Recirc Inlet Nozzle Safe End, Written Correspondence from Robert Healey (Alliant) 11/16/99	4~g 1978 (GE) to	(ket. 1) Frank Dohme	n
Document(s) Reviewed: Stress Report (See above) Calculation for AR 17482			
Conclusions & Comments: Calculation demonstrates acceptability safe-end to nozzle weld.	of flaw	in N2F	
Dave Lemm 11/2 Verifier Dave Lemm 11/2 Marc A Dute 11/ Team Leader Da	20/99	-	

DESIGN VERIFICATION COMMENT SHEET

Sheet <u>2</u> of <u>2</u>

DOCUMENT TYPE/NUMBER: AR 17482 REVISION: 1

LINE/		PREPARER'S	VERIFIER'S
ITEM NO	VERIFIER'S COMMENTS	RESOLUTION	RESOLUTION
	Comments resolved		
-		NA	NA
	with preparer.		
Verifier:_	Jave Lemm_Date: 11/20/99 Pre	parer: They flow	Date: 11/20/99

Introduction

This calculation documents the results of a fracture mechanics evaluation of a subsurface flaw in the safe end-to-nozzle weld of Recirculation Inlet Nozzle N2F (Figure 1). The flaw has a depth of 0.30 in and a length of 0.50 in. The flaw is located at the weld-base metal interface between the Alloy 82 weld and the Alloy 600 safe end. The flaw has been interpreted as a lack of fusion during safe end replacement in 1978 and is not considered to be a service-induced flaw.

Summary of Results

The flaw in Recirculation Nozzle N2F was evaluated in accordance with the flaw evaluation procedures of IWB-3641 of ASME Section XI (1989 Ed.). The allowable flaw depth was determined to be 0.720 in, which is greater than the actual flaw depth of 0.300 in. Therefore, it is acceptable to leave the flaw in the nozzle.

A fatigue analysis was performed to determine the expected growth of the flaw by fatigue from the time the flaw was detected (beginning of Fuel Cycle 17) to end-of-license (2014). The analysis indicated that the expected flaw growth by fatigue is negligible during the evaluation period. Since the flaw is a subsurface flaw that is completely contained within the weld, there would be no flaw growth by stress corrosion cracking (SCC). Therefore, the flaw is not expected to grow inservice beyond its current size.

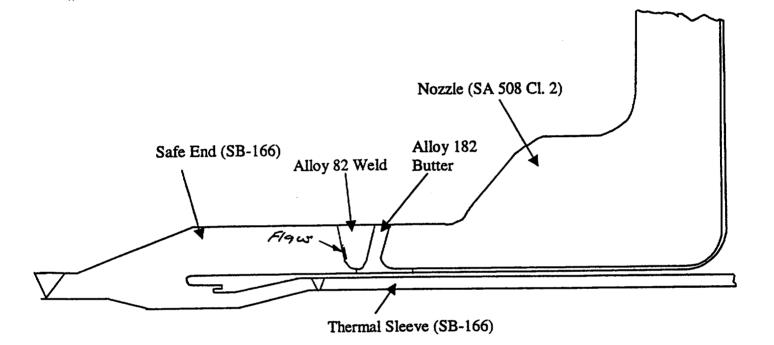


Figure 1. Flaw in Recirculation Inlet Nozzle N2F

11535 DAZ DEPT. AR 17482 Sheet No. ___ PROJECT Evaloration of Flow in 12 F SUBJECT fthe Date 11/19/99 Checked by Daw Lemm Date 11/20/99 CEDAR RAPIDS, IOWA Computed by

EVALUATION OF FLAW IN N2F

Purpose

To evaluate the subsurface flow m Rear Enlet Nozzle NSF. The Flaws has a depth (29) of 0.30 m and a length (2) of 0.5 m. The flaw is located in the safe end-to-nozzle weld at the weld-base metal interface between the Alloy 82 weld and the Alloy 600 Safe and. The Flaw has been interpreted gralack of fusin during Safe end replacement in 1978 and is not considered to be a service induced flace.

References

- 1. Stress Report Recirc Indet Nozzle Safe End Replacement - Duane Arnoid Nuclear Plant, GBI Nuclear Com Pany, Aug 1978.
- 2. CAL-M98-008, RI, Duane Arnoid Reactor Pressure Vessel Transvent Design.

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(IES	PROJECT 472 17482 Sheet No. 2 of
UTILITIES	SUBJECT Evaluation of Flaws in N2F
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Calculations

The flaw is evaluated in accordance with the flaw exaluation procedures if IWB-3641 of REME Section FI (1989 EV.)

1. <u>Flaws Growth</u> <u>stress Corrosion Cracking</u> Since the flaws is a subservace flaw that is completely confamily within the Weld, the flaw is not subject to growth by scc.

Fatique

From the Design Report for the 1978 Safe end Teplacement (Ref. 1), the Stresses in the nozzle safe envare relatively loss.

Stresses were obtained from: Pm= 3.98 ksi Pb = 3.34 RSi 54. 14 - B+ Nozele Loads Pm+Pb = 7.02 RSi Sh 21 - Reaction load trom thermal Sleete

(See Attachment 2)

11535 DAEC. DEPT. PROJECT AT 17482 SUBJECT Even a from of Flaces in No. At Date 11/19/99 Checked by Dave Lemm, Date 11/20/99 CEDAR RAPIDS, IOWA Computed by

For flace evaluation purposes, the stress in the safe ent-to-nozzle werd will be taken 95 1.5 x the calculated stress.

Pm+Pb= 1.5 . 7.02 = 10.5 ksi

The albed able Stress mansity for the Safe end material (Incomel 400) is 23.3 Resi (Table I-1.2 from ASME Section II for SB 166 at Sylor)

Pm+Pb = 0.451 5m

11535 DAÉC DEPT. _ AR 17482 HZ 1748,2 Sheet No. 4 of Eral 497) on of Flgus m N2F VAM Date 11/19/99 Checked by Dave Cemm Date 11/20/99 PROJECT **IES** SUBJECT CEDAR RAPIDS, IOWA Computed by

$$\begin{array}{l} \sigma_{m}, \sigma_{b} = membrane and bening stress (ksi) \\ \sigma = \piait depth (subsurface flow) \\ \sigma = shape factor \\ For \sigma_{m+\sigma_{b}} = \frac{10.5}{28.4} = 0.370 \\ \frac{\sigma}{5_{7}} = \frac{15}{28.4} = 0.376 \\ \frac{\sigma}{1} = \frac{15}{0.5} = .30 \\ \sigma = \frac{15}{7} = \frac{15}{7} = \frac{15}{7} \\ \sigma = \frac{15}{7$$

M_m= membrane stress Correction factor

11535 DAÉC DEPT. FR 17482 Sheet No. 5_of_____ Evaluation of Flow in N2F An______ Date _____ 19/99 Checked by David Lemm Date]1/20/99 PROJECT 772 17482 SUBJECT ____ CEDAR RAPIDS, IOWA Computed by _

$$\frac{29}{4}$$
 $\frac{0.30}{0.96}$ $0.3/3$

Mm = 1.08 for 29 = 0.35 Curre (see p-2) (Fig. A-3300-2) Mb = bening striss correction factor

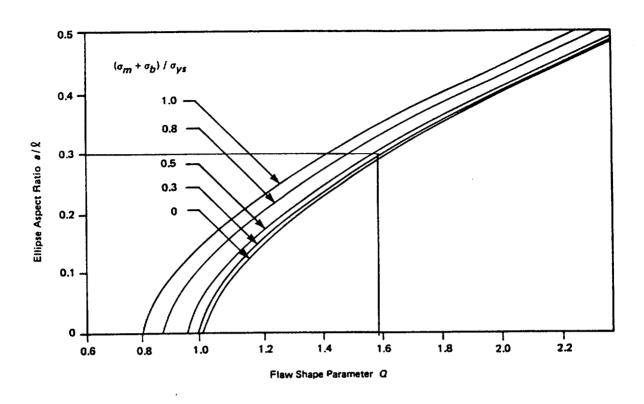
$$\frac{2e}{T} = 0.104$$

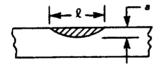
$$\frac{29}{T} = 0.313$$

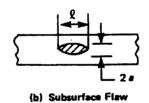
$$\frac{1}{T} = 0.27 - 0.04$$

$$(F_{19}, A - 3300 - 4)$$

Fig. A-3300-1







(a) Surface Flaw

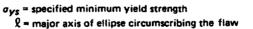


FIG. A-3300-1 SHAPE FACTORS FOR FLAW MODEL

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SECTION XI - DIVISION 1

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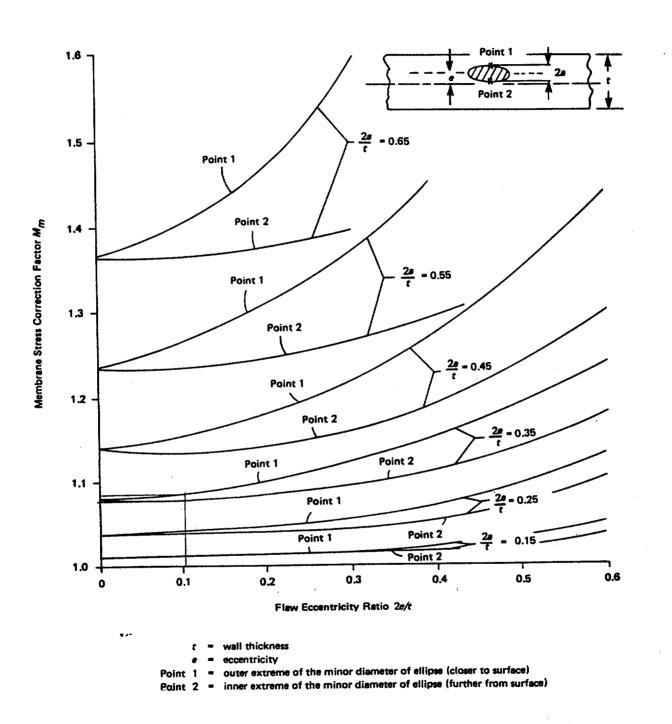


FIG. A-3300-2 MEMBRANE STRESS CORRECTION FACTOR FOR SUBSURFACE FLAWS



SECTION XI - DIVISION 1

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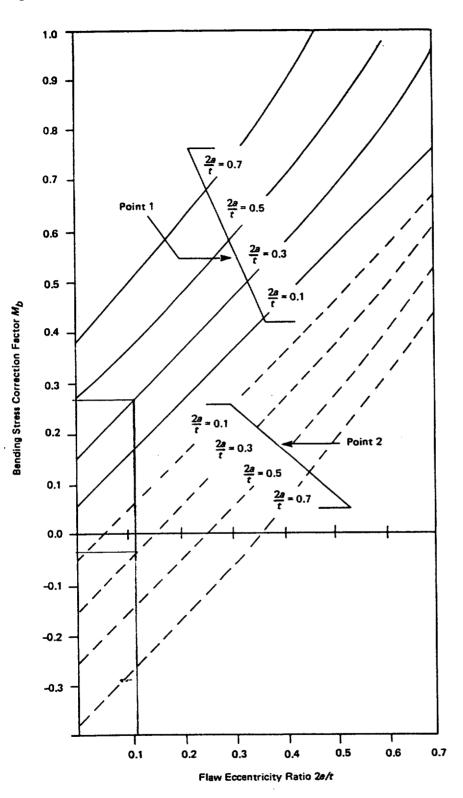
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Compression

side

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1



Point 1 x Point 2

Neutral axis

Tension

side

GENERAL NOTE: If the flaw center line is on the compressive side of the neutral axis, the sign of σ_b should be negative.

FIG. A-3300-4 BENDING STRESS CORRECTION FACTOR FOR SUBSURFACE FLAWS (For Definitions of Nomenclature, See Fig. A-3300-2)

11535		DEPT. DREC	
		PROJECT <u>AR17482</u> Sheet No. <u>9</u> of	
	UTILITIES	SUBJECT EValuation of Flaw m N2F	
	Cedar Rapids, Iowa	Computed by Date	_

Because the flaw is near the center of the weld, the bending stress does not contribute as much to KI as the membrane Stress. A conservative gaswer can be obtained by assuming all the stress is membrane (Pm) stress.

On this basis, KI = Om Mm VA Vala + Ob Mb VA Vala = 0. 451 5m May TG = 0. 451.23.3.1.087 T- 0.15 1.58 = 6.19 Ksi /m

Based on a: - Flaw depte at beginning of evaluation puriod

The crack grows the rate is given by

 $\frac{dq}{dA} = C_0 \left(AK_{I} \right)^{n} \left(\begin{array}{c} C - 3 2 i 0 & 0 \\ Section & T \end{array} \right)$

The fatigues flaws growth that for that for questionstic 600) will be taken 95 that for questionstic standess steel in an air environment.

CEDAR RAPIDS, IOWA Expected No. significant s/s events from fuel cycle is From Ref. 2, the rumber of expected to end-of-life is (from table 1 of Ref. 1) 0 TILITIES " " " ろ ALA 11 ١. " 707 C=/ マシス モーレ 7= 540 F N C (S) h 10 (-10,009 + 8.12E-47 - 1.13E-6 74+1.02E-5 75) = 1.822 E-10 (4.19) 3.3 11 55 u Ú * 7.60 - 8 m Cy Le r 28.1 1.0 DEPT. SUBJECT PROJECT Computed by 0 7 やん 5- N Þ 55 Cycles Q J 49tim ጚ Date h/15/99 Checked by ή £ Flaws m Sheet No. ANANC Date ပ် Į≈ <u>ີ</u>ຂ 120/99

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DAEC DEPT. AR 17482 Sheet No. PROJECT _ Evaluation of Flaws in N2F SUBJECT Date 11/19/99 Checked by Dave Cemm. Date 11/20/9 CEDAR RAPIDS, IOWA Computed by No. of Events Event 15.t. Eol 15-16 16-606 5/5 8 85 77 2 92 94 Scram 10 6 Aborted 5/5 10 101 103 No Thermal 2 Hydro

Number of Significant cycles for rearce beginning of nozzlus between, Fuel Cycle 17 and End-of-Life 15 276.

276

Resummy constant fatique flaw growth of 8.165 E-8 m/cycle, the flaw extension is predicted to be

19 = 7.50 E-8 m - 276 Cycles = 2.07 E-5 m (0.0000207 m)

209-0,0000414

while the fatigue flaw growth that would not be constant, i.e., it would increase as flow dupth(a) increases, this calculation shows that expected fatigue

1535

11535 DEPT. DAEC FILIT482 Sheet No. 12 Evaluation of Flaw in NOF PROJECT A7217482 SUBJECT ____ Date 4/19/99 Checked by Dave Comm Date 1/201 CEDAR RAPIDS, IOWA Computed by _

growth of the flaws in NaF between the beginning of Fuel cycle 17 and End. of Cife is negligible.

2. Allowable Flaws Papth

Allowable fland depth is calculated in accontance with table IWB-3641-1.

- $\frac{P_m + P_6}{5m} = 0.451$
- Ratir Flaws langta to Pipe circumfurence R = 0.5 TD = T.13.12 = 0.012
- $P(lowable \frac{29}{t} = 0.75)$
 - 29 = 0.75 t = 0.75. 0.96 = 0.720 m
 - Therefore flaws size 15 acceptable.

ATTACHMENT 1 1 of 2

GE Nuclear Energy

12200 Herbert Wayne Court, Suite 100, Huntersville, NC 28078

November 16, 1999 Mr. Frank Dohmen Alliant Energy 3277 DAEC Road Palo, IA 52324

SUBJECT: Flaw Evaluation for RRF-F002 Reference: GE-RWH-DAEC-99004

Dear Frank:

During the automated examination of RRF-F002, one flaw indication was recorded. The flaw was determined to be a lack of fusion left from the welding process.

The flaw has the following characteristics:

Flaw 1

 $\mathcal{J} = 1.0^{\circ}$ $l = 0.5^{\circ}$ $2a = .30^{\circ}$ $a = .15^{\circ}$ S = .4 Y = 1 all = .3 alt = 15%Code Allowable = 11.7%

This flaw is classified as a sub-Surface Planar Flaw per IWA-3320. The flaw exceeds the acceptance standards of IWB-3514-2.

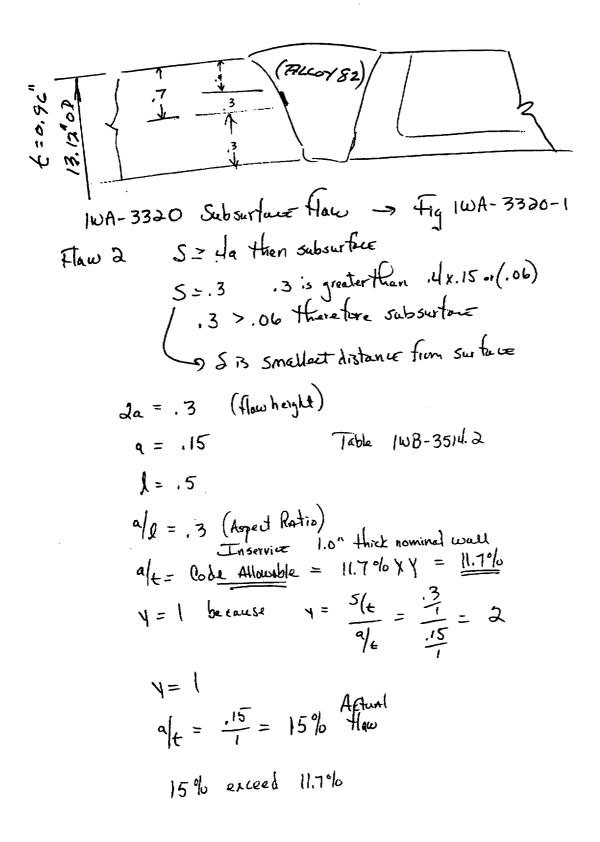
Sincerely,

Will

Robert W. Healey Project Level III GE Nuclear Energy

Dissimilar Metel Weld

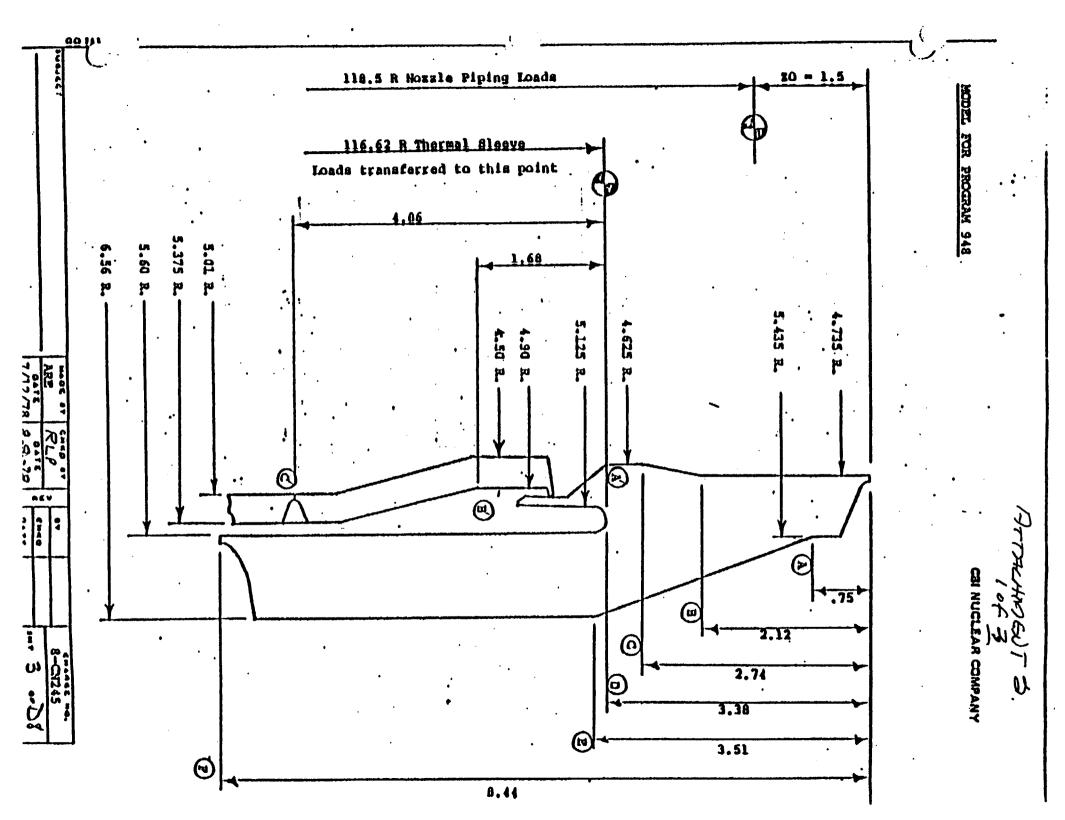
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DIST. FROM SAFE END OF NOZZLE	TO PT. OF	ANALYSIS	Z= 8.44 P= 0.	IN PST
QUANTITY	UNITS	OUTSIDE SURFACE	INSTOE SURFACE	MEMBRANE SURFACE
MAXIMUM STRESS INTENSITY	PST	- 720.	667.	494 .
ТНЕТА	DEGREES	360.	336.	249.
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FY	LBS	0.	: .	0.
FZ	LBS	0.	0.	<u>0.</u>
MX	[N-1_85	0.	0.	0.
MY	[N-1.85	0.	0.	0.
MZ	IN-LBS	<u>0.</u>	0.	0.
LONG. STRESS(PRESSURE)	PST	0.	0,	0
LONG. STRESS(AXIAL LOAD)	PST	354,	354.	354,
LONG. STRESS(BENDING)	PST	365,	285.	-121.
SHEAR STRESS (FORCES + TORSION	PST	-0,	-95.	-213.
CIRC. STRESS(PRESSURE)	PST	0.	0.	0.
\$1	PSI	729.	<u> </u>	364,
52	PST	0	-14.	_151
\$3	<u> </u>		0.	Q
*=THERMAL SLEEVE LOADS APPLIE	D WHEN Z I	S GREATER		•
INSIDE DIAMETER (IN) OUTSIDE DIAMETER (IN) DIST. FROM PT. OF APPL. OF LO	ADS TO SAF	E END (IN)	00 = 13 20 = -1	.200 .120 .500
CLAD, INSIDE ONLY (IN) CORROSION ALLOWANCE INSIDE (I CORROSION ALLOWANCE OUTSIDE(I	N) N)		CA[= 0	•0

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