Tennessee Valley Authority, Post Office Box 2000, Soddy-Daisy, Tennessee 37379

February 23, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

In the Matter of	)	Docket Nos. 50-327
Tennessee Valley Authority	)	50-328

SEQUOYAH NUCLEAR PLANT (SQN) - UNITS 1 AND 2 - CLARIFICATION OF TECHNICAL SPECIFICATION (TS) CHANGE NO. 99-12, "ALTERNATE REPAIR CRITERIA (ARC) FOR STEAM GENERATORS (S/G)"

References:
1. NRC letter to TVA dated February 2, 2000, "Sequoyah Nuclear Plant, Units 1 and 2 - Request for Additional Information on Topical Report WCAP-15128, 'Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP Intersections' (TAC Nos. MA6434, MA7895, and MA7899"
2. TVA letter to NRC dated October 14, 1999, "Sequoyah Nuclear Plant (SQN) - Units 1 and 2 - Technical Specification (TS) Change No. 99-12, 'Alternate Repair Criteria (ARC) for Steam Generators (S/G)'"

This letter documents the clarification changes to the TS pages for TS Change 99-12, which are a result of our response to Reference 1. The revised TS pages replace those of Reference 2 in their entirety. This letter is being provided in advance of our response to Reference 1 and our submittal of Revision 2 to WCAP-15128 to facilitate your review of our request.

NRC staff questions regarding the supporting analysis for SQN TS Change 99-12 (WCAP-15128, Revision 1) were forwarded to

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TVA by the Reference 1 letter and subsequently discussed in a February 9, 2000, meeting between TVA and NRC staff in the NRC Rockville office. The resolution of NRC staff concerns and questions resulted in issuance of WCAP-15128, Revision 2, "Depth-Based SG Tube Repair Criteria for Axial PWSCC at Dented TSP Intersections." Revision 2 to WCAP-15128 now provides the supporting analysis and basis for the subject TS change. In addition, at NRC's request, we have limited our amendment to Cycles 11 and 12 operation.

The changes provided by Revision 2 to WCAP-15128 and the enclosed TS change revision are conservative with respect to our original proposal (Reference 2). Accordingly, TVA has determined that the no significant hazards considerations for TVA's original TS change does not change and that the change remains exempt from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9).

Enclosure 1 provides the marked-up TS change pages for Units 1 and 2. Enclosure 2 provides the revised TS pages for Units 1 and 2.

The clarification pages to SQN TS Change 99-12 are provided to support steam generator inspection activities that are scheduled to start March 2, 2000. NRC approval of TS Change 99-12 is requested by this date to support these outage activities.

If you have any questions about this change, please telephone me at (423) 843-7170 or J. D. Smith at (423) 843-6672.

Sincerely,

Pedro Salas
Licensing and Industry Affairs Manager

Subscribed and sworn to before me
on this 23rd day of February

Peggy M. Billingsley
Notary Public

My Commission Expires Oct. 9, 2002

Enclosures
cc: See page 3

cc (Enclosures):

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ENCLOSURE 1

TENNESSEE VALLEY AUTHORITY
SEQUOYAH PLANT (SQN)
UNITS 1 AND 2

TECHNICAL SPECIFICATION (TS) CHANGE TS-99-12

MARKED PAGES

I. AFFECTED PAGE LIST

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Unit 2

3/4 4-11
3/4 4-13
3/4 4-14a
3/4 4-14b
B 3/4 4-3a

II. MARKED PAGES

See attached.

3. A tube inspection (pursuant to Specification 4.4.5.4.a.8) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

4. Indications left in service as a result of application of the tube support plate voltage-based repair criteria shall be inspected by bobbin coil probe during all future refueling outages. R226

c. The tubes selected as the second and third samples (if required by Table 4.4-2) during each inservice inspection may be subjected to a partial tube inspection provided:

1. The tubes selected for these samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found.

2. The inspections include those portions of the tubes where imperfections were previously found.

NOTE: Tube degradation identified in the portion of the tube that is not a reactor coolant pressure boundary (tube end up to the start of the tube-to-tubesheet weld) is excluded from the Result and Action Required in Table 4.4-2. R193

d. Implementation of the steam generator tube/tube support plate repair criteria requires a 100 percent bobbin coil inspection for hot-leg and cold-leg tube support plate intersections down to the lowest cold-leg tube support plate with known outside diameter stress corrosion cracking (ODSCC) indications. The determination of the lowest cold-leg tube support plate intersections having ODSCC indications shall be based on the performance of at least a 20 percent random sampling of tubes inspected over their full length. R226

INSERT A

The results of each sample inspection shall be classified into one of the following three categories:

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.
C-2	One or more tubes, but not more than 1% of the total tubes inspected are defective, or between 5% and 10% of the total tubes inspected are degraded tubes.
C-3	More than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective.

Note: In all inspections, previously degraded tubes must exhibit significant (greater than 10%) further wall penetrations to be included in the above percentage calculations.

R226

4.4.5.4 Acceptance Criteria

a. As used in this Specification:

1. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

2. Degradation means a service-induced cracking, wastage, wear or general corrosion occuring or either inside or outside of a tube.

3. Degraded Tube means a tube containing imperfections greater than or equal to 20% of the nominal wall thickness caused by degradation.

4. % Degradation means the percentage of the tube wall thickness affected or removed by degradation.

5. Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

6. Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service and is equal to 40% of the nominal tube wall thickness. Plugging limit does not apply to that portion of the tube that is not within the pressure boundary of the reactor coolant system (tube end up to the start of the tube-to-tubesheet weld). This definition does not apply to tube support plate intersections if the voltage-based repair criteria are being applied. Refer to 4.4.5.4.a.10 for the repair limit applicable to these intersections. R193 R226

INSERT B

7. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 4.4.5.3.c, above.

8. Tube Inspection means an inspection of the steam generator tube from the point of entry (hot leg side) completely around the U-bend to the top support of the cold leg.

9. Preservice Inspection means a tube inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service establish a baseline condition of the tubing. This inspection shall be performed prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

10. Tube Support Plate Plugging Limit is used for the disposition of an alloy 600 steam generator tube for continued service that is experiencing predominately axially oriented outside diameter stress corrosion cracking confined within the R226

SURVEILLANCE REQUIREMENTS (Continued)

where:

V_{URL}	=	upper voltage repair limit
V_{LRL}	=	lower voltage repair limit
V_{MURL}	=	mid-cycle upper voltage repair limit based on time into cycle
V_{MLRL}	=	mid-cycle lower voltage repair limit based on V_{MURL} and time into cycle
Δt	=	length of time since last scheduled inspection during which V_{URL} and V_{LRL} were implemented
CL	=	cycle length (the time between two scheduled steam generator inspections)
V_{SL}	=	structural limit voltage
Gr	=	average growth rate per cycle length
NDE	=	95-percent cumulative probability allowance for nondestructive examination uncertainty (i.e., a value of 20-percent has been approved by NRC)

R226

Implementation of these mid-cycle repair limits should follow the same approach as in TS 4.4.5.4.a.10.a, 4.4.5.4.a.10.b, and 4.4.5.4.a.10.c.

Note 1: The lower voltage repair limit is 1.0 volt for 3/4-inch diameter tubing or 2.0 volts for 7/8-inch diameter tubing.

Note 2: The upper voltage repair limit is calculated according to the methodology in GL 90-05 as supplemented. V_{URL} may differ at the TSPs and flow distribution baffle.

INSERT C

SURVEILLANCE REQUIREMENTS (Continued)

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plug all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 4.4-2.

4.4.5.5 Reports

a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

b. The complete results of the steam generator tube inservice inspection shall be submitted to the Commission in a Special Report pursuant to Specification 6.9.2 within 12 months following completion of the inspection. This Special Report shall include:

1. Number and extent of tubes inspected.

2. Location and percent of wall-thickness penetration for each indication of an imperfection.

3. Identification of tubes plugged.

c. Results of steam generator tube inspections which fall into Category C-3 shall be reported pursuant to Specification 6.6.1 prior to resumption of plant operation. The written followup of this report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence. R40

d. For implementation of the voltage-based repair criteria to tube support plate intersections, notify the staff prior to returning the steam generators to service should any of the following conditions arise:

1. If estimated leakage based on the projected end-of-cycle (or if not practical using the actual measured end-of-cycle) voltage distribution exceeds the leak limit (determined from the licensing basis dose calculation for the postulated main steam line break) for the next operating cycle. R226

2. If circumferential crack-like indications are detected at the tube support plate intersections.

3. If indications are identified that extend beyond the confines of the tube support plate.

4. If indications are identified at the tube support plate elevations that are attributable to primary water stress corrosion cracking.

5. If the calculated conditional burst probability based on the projected end-of-cycle (or if not practical, using the actual measured end-of-cycle) voltage distribution exceeds 1×10^{-2}, notify the NRC and provide an assessment of the safety significance of the occurrence.

INSERT D

The mid-cycle equation of SR 4.4.5.4.a.10.e should only be used during unplanned inspection in which eddy current data is acquired for indications at the tube support plates.

SR 4.4.5.5 implements several reporting requirements recommended by GL 95-05 for situations which NRC wants to be notified prior to returning the S/Gs to service. For SR 4.4.5.5.d., Items 3 and 4, indications are applicable only where alternate plugging criteria is being applied. For the purposes of this reporting requirement, leakage and conditional burst probability can be calculated based on the as-found voltage distribution rather than the projected end-of-cycle voltage distribution (refer to GL 95-05 for more information) when it is not practical to complete these calculations using the projected EOC voltage distributions prior to returning the S/Gs to service. Note that if leakage and conditional burst probability were calculated using the measured EOC voltage distribution for the purposes of addressing GL Sections 6.a.1 and 6.a.3 reporting criteria, then the results of the projected EOC voltage distribution should be provided per GL Section 6.b(c) criteria. R226

Wastage-type defects are unlikely with proper chemistry treatment of the secondary coolant. However, even if a defect should develop in service, it will be found during scheduled inservice steam generator tube examinations. Plugging will be required for all tubes with imperfections exceeding the repair limit defined in Surveillance Requirement 4.4.5.4.a. The portion of the tube that the plugging limit does not apply to is the portion of the tube that is not within the RCS pressure boundary (tube end up to the start of the tube-to-tubesheet weld). The tube end to tube-to-tubesheet weld portion of the tube does not affect structural integrity of the steam generator tubes and therefore indications found in this portion of the tube will be excluded from the Result and Action Required for tube inspections. It is expected that any indications that extend from this region will be detected during the scheduled tube inspections. Steam generator tube inspections of operating plants have demonstrated the capability to reliably detect degradation that has penetrated 20% of the original tube wall thickness. R226 R193

Tubes experiencing outside diameter stress corrosion cracking within the thickness of the tube support plate are plugged or repaired by the criteria of 4.4.5.4.a.10. R226

Whenever the results of any steam generator tubing inservice inspection fall into Category C-3, these results will be promptly reported to the Commission pursuant to Specification 6.6.1 prior to resumption of plant operation. Such cases will be considered by the Commission on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, and revision of the Technical Specifications, if necessary. R40

INSERT E

R226

Technical Specification Change 99-12
Sequoyah Nuclear Plant
Units 1 and 2

INSERT PAGE

INSERT A

e. Inspection of dented tube support plate intersections will be performed in accordance with WCAP 15128, Revision 2, dated February 2000. This alternate repair criteria is applicable to Cycle 11 and 12 operation.

INSERT B

For Cycle 11 and 12 operation, this definition does not apply for axial PWSCC indications, or portions thereof, which are located within the thickness of dented tube support plates which exhibit a maximum depth greater than or equal to 40 percent of the initial tube wall thickness. Refer to 4.4.5.4.a.11 for the repair limits applicable to these intersections.

INSERT C

11. Primary Water Stress Corrosion Cracking (PWSCC) Tube Support Plate Plugging Limit is used for the disposition of an Alloy 600 steam generator tube for continued service that is experiencing predominantly axially oriented PWSCC at dented tube support plate intersections. This plugging limit is described in WCAP 15128, Revision 2, dated February 2000. This alternate repair criteria is applicable to Cycle 11 and 12 operation.

INSERT D

e. For implementation of the depth-based repair criteria for axial PWSCC at dented TSPs, the results of the condition monitoring and operational assessments will be reported to the NRC within 120 days following completion of the inspection. The report will include tabulations of indications found in the inspection, tabulations of tubes repaired and left in service under the ARC, and growth rate distributions for indications found in the inspection as well as the growth distributions used to establish the tube repair limits. Any corrective actions found necessary in the event that condition monitoring requirements are not met will be identified in the report.

INSERT E

The steam generator tube repair limits for primary water stress corrosion cracking (PWSCC) of SR 4.4.5 represents a steam generator tube alternate repair criteria for greater than or equal to 40 percent deep PWSCC indications which are located within the thickness of tube support plates. The repair bases for PWSCC are not applicable to other types of localized tube wall degradation located at the tube-to-tube support plate intersections.

The ARC includes, completion of a condition monitoring assessment to determine the end-of-cycle (EOC) condition of the tube bundle. An operational assessment is completed to determine the need for tube repair on a forward-fit basis. The ARC is based on the use of crack depth profiles obtained from Plus Point analyses. Burst pressures and leak rates are calculated from depth profiles by searching the total crack length for the partial length that results in the lowest burst pressure and the longest length that would tear through-wall at steam-line break conditions. The repair bases for PWSCC at dented TSP intersections is obtained by projecting the crack profile to the end of the next operating cycle and determining if the projected profile meets the requirements of WCAP-15128, Revision 2, dated February 2000. The following provides the limits and bases for repair established in the WCAP analyses:

Freespan Indication Repair Limits

The tube will be repaired if the crack length outside the dented TSP is ≥40% maximum depth.

Crack Length Limit for ≥40% Maximum Depth

The crack length limit for ≥40% maximum depth indications is defined as 0.375 inch from the centerline of the TSP. This limit defines the edges of the TSP thickness of 0.75 inch for Model 51 S/Gs. It is acceptable for the crack to extend to both edges of the TSP as long as the maximum depth of the crack outside the TSP is <40% maximum depth and the requirements for EOC conditions are acceptable.

Operational Assessment Repair Bases

If the indication satisfies the above maximum depth and length requirements, the repair bases is then obtained by projecting the crack profile to the end of the next operating cycle and

INSERT PAGE (Continued)

determining the burst pressure and leakage for the projected profile. The burst pressure and leakage is compared to the requirements in WCAP-15128, Revision 2, dated February 2000. Separate analyses are required for the total crack length and the length outside the TSP due to differences in requirements. If the projected EOC requirements are satisfied, the tube will be left in service.

The results of the condition monitoring and operational assessments will be reported to the NRC within 120 days following completion of the inspection.

SURVEILLANCE REQUIREMENTS (Continued)

1. All nonplugged tubes that previously had detectable wall penetrations (greater than 20%).

2. Tubes in those areas where experience has indicated potential problems.

3. A tube inspection (pursuant to Specification 4.4.5.4.a.8) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

4. Indications left in service as a result of application of the tube support plate voltage-based repair criteria shall be inspected by bobbin coil probe during all future refueling outages. R213

c. The tubes selected as the second and third samples (if required by Table 4.4-2) during each inservice inspection may be subjected to a partial tube inspection provided:

1. The tubes selected for these samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found.

2. The inspections include those portions of the tubes where imperfections were previously found.

Note: Tube degradation identified in the portion of the tube that is not a reactor coolant pressure boundary (tube end up to the start of the tube-to-tubesheet weld) is excluded from the Result and Action Required in Table 4.4-2. R181

d. Implementation of the steam generator tube/tube support plate repair criteria requires a 100 percent bobbin coil inspection for hot-leg and cold-leg tube support plate intersections down to the lowest cold-leg tube support plate with known outside diameter stress corrosion cracking (ODSCC) indications. The determination of the lowest cold-leg tube support plate intersections having ODSCC indications shall be based on the performance of at least a 20 percent random sampling of tubes inspected over their full length. R213

INSERT A

The results of each sample inspection shall be classified into one of the following three categories:

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.

R213

SURVEILLANCE REQUIREMENTS (Continued)

4.4.5.4 Acceptance Criteria

a. As used in this Specification:

1. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

2. Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.

3. Degraded Tube means a tube containing imperfections greater than or equal to 20% of the nominal wall thickness caused by degradation.

4. % Degradation means the percentage of the tube wall thickness affected or removed by degradation.

5. Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

6. Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service and is equal to 40% of the nominal tube wall thickness. Plugging limit does not apply to that portion of the tube that is not within the pressure boundary of the reactor coolant system (tube end up to the start of the tube-to-tubesheet weld). This definition does not apply to tube support plate intersections if the voltage-based repair criteria are being applied. Refer to 4.4.5.4.a.10 for the repair limit applicable to these intersections. R181 R213

INSERT B

7. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 4.4.5.3.c, above.

8. Tube Inspection means an inspection of the steam generator tube from the point of entry (hot leg side) completely around the U-bend to the top support of the cold leg.

9. Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

10. Tube Support Plate Plugging Limit is used for the disposition of an alloy 600 steam generator tube for continued service that is experiencing predominately axially oriented outside diameter stress corrosion cracking confined within the thickness of the R213

where:

V_{URL}	=	upper voltage repair limit
V_{LRL}	=	lower voltage repair limit
V_{MURL}	=	mid-cycle upper voltage repair limit based on time into cycle
V_{MLRL}	=	mid-cycle lower voltage repair limit based on V_{MURL} and time into cycle
Δt	=	length of time since last scheduled inspection during which V_{URL} and V_{LRL} were implemented
CL	=	cycle length (the time between two scheduled steam generator inspections)
V_{SL}	=	structural limit voltage
Gr	=	average growth rate per cycle length
NDE	=	95-percent cumulative probability allowance for nondestructive examination uncertainty (i.e., a value of 20-percent has been approved by NRC)

R213

Implementation of these mid-cycle repair limits should follow the same approach as in TS 4.4.5.4.a.10.a, 4.4.5.4.a.10.b, and 4.4.5.4.a.10.c.

Note 1: The lower voltage repair limit is 1.0 volt for 3/4-inch diameter tubing or 2.0 volts for 7/8-inch diameter tubing.

Note 2: The upper voltage repair limit is calculated according to the methodology in GL 90-05 as supplemented. V_{URL} may differ at the TSPs and flow distribution baffle.

INSERT C

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plug all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 4.4-2.

4.4.5.5 Reports

a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

b. The complete results of the steam generator tube inservice inspection shall be submitted to the Commission in a Special Report pursuant to Specification 6.9.2 within 12 months following the completion of the inspection. This Special Report shall include:

1. Number and extent of tubes inspected.

R213

SURVEILLANCE REQUIREMENTS (Continued)

2. Location and percent of wall-thickness penetration for each indication of an imperfection.

3. Identification of tubes plugged.

c. Results of steam generator tube inspections which fall into Category C-3 shall be reported pursuant to Specification 6.6.1 prior to resumption of plant operation. The written followup of this report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence. R28

d. For implementation of the voltage-based repair criteria to tube support plate intersections, notify the staff prior to returning the steam generators to service should any of the following conditions arise:

1. If estimated leakage based on the projected end-of-cycle (or if not practical using the actual measured end-of-cycle) voltage distribution exceeds the leak limit (determined from the licensing basis dose calculation for the postulated main steam line break) for the next operating cycle. R213

2. If circumferential crack-like indications are detected at the tube support plate intersections.

3. If indications are identified that extend beyond the confines of the tube support plate.

4. If indications are identified at the tube support plate elevations that are attributable to primary water stress corrosion cracking.

5. If the calculated conditional burst probability based on the projected end-of-cycle (or if not practical, using the actual measured end-of-cycle) voltage distribution exceeds 1×10^{-2}, notify the NRC and provide an assessment of the safety significance of the occurrence.

INSERT D

R213

where V_{GR} represents the allowance for flaw growth between inspections and V_{NDE} represents the allowance for potential sources of error in the measurement of the bobbin coil voltage. Further discussion of the assumptions necessary to determine the voltage repair limit are discussed in GL 95-05.

The mid-cycle equation of SR 4.4.5.4.a.10.e should only be used during unplanned inspection in which eddy current data is acquired for indications at the tube support plates. R213

SR 4.4.5.5 implements several reporting requirements recommended by GL 95-05 for situations which NRC wants to be notified prior to returning the S/Gs to service. For SR 4.4.5.5.d., Items 3 and 4, indications are applicable only where alternate plugging criteria is being applied. For the purposes of this reporting requirement, leakage and conditional burst probability can be calculated based on the as-found voltage distribution rather than the projected end-of-cycle voltage distribution (refer to GL 95-05 for more information) when it is not practical to complete these calculations using the projected EOC voltage distributions prior to returning the S/Gs to service. Note that if leakage and conditional burst probability were calculated using the measured EOC voltage distribution for the purposes of addressing GL Sections 6.a.1 and 6.a.3 reporting criteria, then the results of the projected EOC voltage distribution should be provided per GL Section 6.b(c) criteria.

Wastage-type defects are unlikely with proper chemistry treatment of the secondary coolant. However, even if a defect should develop in service, it will be found during scheduled inservice steam generator tube examinations. Plugging will be required for all tubes with imperfections exceeding the repair limit defined in Surveillance Requirement 4.4.5.4.a. The portion of the tube that the plugging limit does not apply to is the portion of the tube that is not within the RCS pressure boundary (tube end up to the start of the tube-to-tubesheet weld). The tube end to tube-to-tubesheet weld portion of the tube does not affect structural integrity of the steam generator tubes and therefore indications found in this portion of the tube will be excluded from the Result and Action Required for tube inspections. It is expected that any indications that extend from this region will be detected during the scheduled tube inspections. Steam generator tube inspections of operating plants have demonstrated the capability to reliably detect degradation that has penetrated 20% of the original tube wall thickness. R21

Tubes experiencing outside diameter stress corrosion cracking within the thickness of the tube support plate are plugged or repaired by the criteria of 4.4.5.4.a.10. R2

Whenever the results of any steam generator tubing inservice inspection fall into Category C-3, these results will be promptly reported to the Commission pursuant to Specification 6.6.1 prior to resumption of plant operation. Such cases will be considered by the Commission on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, and revision of the Technical Specifications, if necessary.

INSERT E

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY
SEQUOYAH NUCLEAR PLANT (SQN)
UNITS 1 AND 2

TECHNICAL SPECIFICATION (TS) CHANGE TS-99-12
REVISED PAGES

I. AFFECTED PAGE LIST

Unit 1

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Unit 2

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B 3/4 4-3a
B 3/4 4-3b

II. REVISED PAGES

See attached.

3. A tube inspection (pursuant to Specification 4.4.5.4.a.8) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

4. Indications left in service as a result of application of the tube support plate voltage-based repair criteria shall be inspected by bobbin coil probe during all future refueling outages. R226

c. The tubes selected as the second and third samples (if required by Table 4.4-2) during each inservice inspection may be subjected to a partial tube inspection provided:

1. The tubes selected for these samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found.

2. The inspections include those portions of the tubes where imperfections were previously found.

NOTE: Tube degradation identified in the portion of the tube that is not a reactor coolant pressure boundary (tube end up to the start of the tube-to-tubesheet weld) is excluded from the Result and Action Required in Table 4.4-2. R193

d. Implementation of the steam generator tube/tube support plate repair criteria requires a 100 percent bobbin coil inspection for hot-leg and cold-leg tube support plate intersections down to the lowest cold-leg tube support plate with known outside diameter stress corrosion cracking (ODSCC) indications. The determination of the lowest cold-leg tube support plate intersections having ODSCC indications shall be based on the performance of at least a 20 percent random sampling of tubes inspected over their full length. R226

e. Inspection of dented tube support plate intersections will be performed in accordance with WCAP 15128, Revision 2, dated February 2000. This alternate repair criteria is applicable to Cycle 11 and 12 operation.

The results of each sample inspection shall be classified into one of the following three categories:

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.
C-2	One or more tubes, but not more than 1% of the total tubes inspected are defective, or between 5% and 10% of the total tubes inspected are degraded tubes.
C-3	More than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective.

Note: In all inspections, previously degraded tubes must exhibit significant (greater than 10%) further wall penetrations to be included in the above percentage calculations.

R226

4.4.5.4 Acceptance Criteria

a. As used in this Specification:

1. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

2. Degradation means a service-induced cracking, wastage, wear or general corrosion occuring or either inside or outside of a tube.

3. Degraded Tube means a tube containing imperfections greater than or equal to 20% of the nominal wall thickness caused by degradation.

4. % Degradation means the percentage of the tube wall thickness affected or removed by degradation.

5. Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

6. Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service and is equal to 40% of the nominal tube wall thickness. Plugging limit does not apply to that portion of the tube that is not within the pressure boundary of the reactor coolant system (tube end up to the start of the tube-to-tubesheet weld). This definition does not apply to tube support plate intersections if the voltage-based repair criteria are being applied. Refer to 4.4.5.4.a.10 for the repair limit applicable to these intersections. For Cycle 11 and 12 operation, this definition does not apply for axial PWSCC indications, or portions thereof, which are located within the thickness of dented tube support plates which exhibit a maximum depth greater than or equal to 40 percent of the initial tube wall thickness. Refer to 4.4.5.4.a.11 for the repair limits applicable to these intersections. R193 R226

7. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 4.4.5.3.c, above.

8. Tube Inspection means an inspection of the steam generator tube from the point of entry (hot leg side) completely around the U-bend to the top support of the cold leg.

9. Preservice Inspection means a tube inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service establish a baseline condition of the tubing. This inspection shall be performed prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

10. Tube Support Plate Plugging Limit is used for the disposition of an alloy 600 steam generator tube for continued service that is experiencing predominately axially oriented outside diameter stress corrosion cracking confined within the thickness of the tube support plates. At tube support plate intersections, the plugging (repair) limit is based on maintaining steam generator tube serviceability as described below:

    a. Steam generator tubes, whose degradation is attributed to outside diameter stress corrosion cracking within the bounds of the tube support plate with bobbin voltages less than or equal to the lower voltage repair limit (Note 1), will be allowed to remain in service.

    b. Steam generator tubes, whose degradation is attributed to outside diameter stress corrosion cracking within the bounds of the tube support plate with a bobbin voltage greater than the lower voltage repair limit (Note 1), will be repaired or plugged, except as noted in 4.4.5.4.a.10.c below.

    c. Steam generator tubes, with indications of potential degradation attributed to outside diameter stress corrosion-cracking within the bounds of the tube support plate with a bobbin voltage greater than the lower voltage repair limit (Note 1), but less than or equal to upper voltage repair limit (Note 2), may remain in service if a rotating pancake coil inspection does not detect degradation. Steam generator tubes, with indications of outside diameter stress corrosion-cracking degradation with a bobbin coil voltage greater than the upper voltage repair limit (Note 2) will be plugged or repaired. R226

    d. Not applicable to SQN.

    e. If an unscheduled mid-cycle inspection is performed, the following mid-cycle repair limits apply instead of the limits identified in 4.4.5.4.a.10.a, 4.4.5.4.a.10.b, and 4.4.5.4.a.10.c.

The mid-cycle repair limits are determined from the following equations:

$$V_{MURL} = \frac{V_{SL}}{1.0+NDE+Gr\frac{(CL-\Delta t)}{CL}}$$

$$V_{MLRL}=V_{MURL}-(V_{URL}-V_{LRL})\frac{(CL-\Delta t)}{CL}$$

where:

V_{URL}	=	upper voltage repair limit
V_{LRL}	=	lower voltage repair limit
V_{MURL}	=	mid-cycle upper voltage repair limit based on time into cycle
V_{MLRL}	=	mid-cycle lower voltage repair limit based on V_{MURL} and time into cycle
Δt	=	length of time since last scheduled inspection during which V_{URL} and V_{LRL} were implemented
CL	=	cycle length (the time between two scheduled steam generator inspections)
V_{SL}	=	structural limit voltage
Gr	=	average growth rate per cycle length
NDE	=	95-percent cumulative probability allowance for nondestructive examination uncertainty (i.e., a value of 20-percent has been approved by NRC)

R226

Implementation of these mid-cycle repair limits should follow the same approach as in TS 4.4.5.4.a.10.a, 4.4.5.4.a.10.b, and 4.4.5.4.a.10.c.

Note 1: The lower voltage repair limit is 1.0 volt for 3/4-inch diameter tubing or 2.0 volts for 7/8-inch diameter tubing.

Note 2: The upper voltage repair limit is calculated according to the methodology in GL 90-05 as supplemented. V_{URL} may differ at the TSPs and flow distribution baffle.

11. Primary Water Stress Corrosion Cracking (PWSCC) Tube Support Plate Plugging Limit is used for the disposition of an Alloy 600 steam generator tube for continued service that is experiencing predominantly axially oriented PWSCC at dented tube support plate intersections as described in WCAP 15128, Revision 2, dated February 2000. This alternate repair criteria is applicable to Cycle 11 and 12 operation.

SURVEILLANCE REQUIREMENTS (Continued)

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plug all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 4.4-2.

4.4.5.5 Reports

a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

b. The complete results of the steam generator tube inservice inspection shall be submitted to the Commission in a Special Report pursuant to Specification 6.9.2 within 12 months following completion of the inspection. This Special Report shall include:

1. Number and extent of tubes inspected.

2. Location and percent of wall-thickness penetration for each indication of an imperfection.

3. Identification of tubes plugged.

R40

c. Results of steam generator tube inspections which fall into Category C-3 shall be reported pursuant to Specification 6.6.1 prior to resumption of plant operation. The written followup of this report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.

d. For implementation of the voltage-based repair criteria to tube support plate intersections, notify the staff prior to returning the steam generators to service should any of the following conditions arise:

1. If estimated leakage based on the projected end-of-cycle (or if not practical using the actual measured end-of-cycle) voltage distribution exceeds the leak limit (determined from the licensing basis dose calculation for the postulated main steam line break) for the next operating cycle. R226

2. If circumferential crack-like indications are detected at the tube support plate intersections.

3. If indications are identified that extend beyond the confines of the tube support plate.

4. If indications are identified at the tube support plate elevations that are attributable to primary water stress corrosion cracking.

5. If the calculated conditional burst probability based on the projected end-of-cycle (or if not practical, using the actual measured end-of-cycle) voltage distribution exceeds 1×10^{-2}, notify the NRC and provide an assessment of the safety significance of the occurrence.

SURVEILLANCE REQUIREMENTS (Continued)

e. For implementation of the depth-based repair criteria for axial PWSCC at dented TSPs, the results of the condition monitoring and operational assessments will be reported to the NRC within 120 days following completion of the inspection. The report will include tabulations of indications found in the inspection, tabulations of tubes repaired and left in service under the ARC, and growth rate distributions for indications found in the inspection as well as the growth distributions used to establish the tube repair limits. Any corrective actions found necessary in the event that condition monitoring requirements are not met will be identified in the report.

The mid-cycle equation of SR 4.4.5.4.a.10.e should only be used during unplanned inspection in which eddy current data is acquired for indications at the tube support plates.

SR 4.4.5.5 implements several reporting requirements recommended by GL 95-05 for situations which NRC wants to be notified prior to returning the S/Gs to service. For SR 4.4.5.5.d., Items 3 and 4, indications are applicable only where alternate plugging criteria is being applied. For the purposes of this reporting requirement, leakage and conditional burst probability can be calculated based on the as-found voltage distribution rather than the projected end-of-cycle voltage distribution (refer to GL 95-05 for more information) when it is not practical to complete these calculations using the projected EOC voltage distributions prior to returning the S/Gs to service. Note that if leakage and conditional burst probability were calculated using the measured EOC voltage distribution for the purposes of addressing GL Sections 6.a.1 and 6.a.3 reporting criteria, then the results of the projected EOC voltage distribution should be provided per GL Section 6.b(c) criteria. R226

Wastage-type defects are unlikely with proper chemistry treatment of the secondary coolant. However, even if a defect should develop in service, it will be found during scheduled inservice steam generator tube examinations. Plugging will be required for all tubes with imperfections exceeding the repair limit defined in Surveillance Requirement 4.4.5.4.a. The portion of the tube that the plugging limit does not apply to is the portion of the tube that is not within the RCS pressure boundary (tube end up to the start of the tube-to-tubesheet weld). The tube end to tube-to-tubesheet weld portion of the tube does not affect structural integrity of the steam generator tubes and therefore indications found in this portion of the tube will be excluded from the Result and Action Required for tube inspections. It is expected that any indications that extend from this region will be detected during the scheduled tube inspections. Steam generator tube inspections of operating plants have demonstrated the capability to reliably detect degradation that has penetrated 20% of the original tube wall thickness. R226 R193

Tubes experiencing outside diameter stress corrosion cracking within the thickness of the tube support plate are plugged or repaired by the criteria of 4.4.5.4.a.10. R226

The steam generator tube repair limits for primary water stress corrosion cracking (PWSCC) of SR 4.4.5 represents a steam generator tube alternate repair criteria for greater than or equal to 40 percent deep PWSCC indications which are located within the thickness of tube support plates. The repair bases for PWSCC are not applicable to other types of localized tube wall degradation located at the tube-to-tube support plate intersections.

The ARC includes completion of a condition monitoring assessment to determine the end-of-cycle (EOC) condition of the tube bundle. An operational assessment is completed to determine the need for tube repair on a forward-fit basis. The ARC is based on the use of crack depth profiles obtained from Plus Point analyses. Burst pressures and leak rates are calculated from depth profiles by searching the total crack length for the partial length that results in the lowest burst pressure and the longest length that would tear through-wall at steam-line break conditions. The repair bases for PWSCC at dented TSP intersections is obtained by projecting the crack profile to the end of the next operating cycle and determining if the projected profile meets the requirements of WCAP 15128, Revision 2, dated February 2000. The following provides the limits and bases for repair established in the WCAP analyses:

Freespan Indication Repair Limits

The tube will be repaired if the crack length outside the dented TSP is ≥40% maximum depth.

Crack Length Limit for ≥40% Maximum Depth

The crack length limit for ≥40% maximum depth indications is defined as 0.375 inch from the centerline of the TSP. This limit defines the edges of the TSP thickness of 0.75 inch for Model 51 S/Gs. It is acceptable for the crack to extend to both edges of the TSP as long as the maximum depth of the crack outside the TSP is <40% maximum depth and the requirements for EOC conditions are acceptable.

Operational Assessment Repair Bases

If the indication satisfies the above maximum depth and length requirements, the repair bases is then obtained by projecting the crack profile to the end of the next operating cycle and determining the burst pressure and leakage for the projected profile. The burst pressure and leakage is compared to the requirements in WCAP 15128, Revision 2, dated February 2000. Separate analyses are required for the total crack length and the length outside the TSP due to differences in requirements. If the projected EOC requirements are satisfied, the tube will be left in service.

The results of the condition monitoring and operational assessments will be reported to the NRC within 120 days following completion of the inspection.

Whenever the results of any steam generator tubing inservice inspection fall into Category C-3, these results will be promptly reported to the Commission pursuant to Specification 6.6.1 prior to resumption of plant operation. Such cases will be considered by the Commission on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, and revision of the Technical Specifications, if necessary. R40

R226

3/4.4.6 REACTOR COOLANT SYSTEM LEAKAGE

3/4.4.6.1 LEAKAGE DETECTION SYSTEMS

The RCS leakage detection systems required by this specification are provided to monitor and detect leakage from the Reactor Coolant Pressure Boundary. These detection systems are consistent with the recommendations of Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems," May 1973.

3/4.4.6.2 OPERATIONAL LEAKAGE

Industry experience has shown that while a limited amount of leakage is expected from the RCS, the unidentified portion of this leakage can be reduced to a threshold value of less than 1 GPM. This threshold value is sufficiently low to ensure early detection of additional leakage.

The surveillance requirements for RCS Pressure Isolation Valves provide added assurances of valve integrity thereby reducing the probability of gross valve failure and consequent intersystem LOCA. Leakage from the RCS isolation valves is IDENTIFIED LEAKAGE and will be considered as a portion of the allowed limit.

The 10 GPM IDENTIFIED LEAKAGE limitation provides allowance for a limited amount of leakage from known sources whose presence will not interfere with the detection of UNIDENTIFIED LEAKAGE by the leakage detection systems.

The CONTROLLED LEAKAGE limitation restricts operation when the total flow supplied to the reactor coolant pump seals exceeds 40 GPM with the modulating valve in the supply line fully open at a nominal RCS pressure of 2235 psig. This limitation ensures that in the event of a LOCA, the safety injection flow will not be less than assumed in the accident analyses.

The total steam generator tube leakage limit of 600 gallons per day for all steam generators and 150 gallons per day for any one steam generator will minimize the potential for a significant leakage event during steam line break. Based on the NDE uncertainties, bobbin coil voltage distribution and crack growth rate from the previous inspection, the expected leak rate following a steam line rupture is limited to below 8.21 gpm at atmospheric conditions and 70°F in the faulted loop, which will limit the calculated offsite doses to within 10 percent of the 10 CFR 100 guidelines. If the projected and cycle distribution of crack indications results in primary-to-secondary leakage greater than 8.21 gpm in the faulted loop during a postulated steam line break event, additional tubes must be removed from service in order to reduce the postulated primary-to-secondary steam line break leakage to below 8.21 gpm. R226 R241

The 150-gallons per day limit incorporated into SR 4.4.6 is more restrictive than the standard operating leakage limit and is intended to provide an additional margin to accommodate a crack which might grow at a greater than expected rate or unexpectedly extend outside the thickness of the tube support plate. Hence, the reduced leakage limit, when combined with an effective leak rate monitoring program, provides additional assurance that, should a significant leak be experienced, it will be detected, and the plant shut down in a timely manner.

PRESSURE BOUNDARY LEAKAGE of any magnitude is unacceptable since it may be indicative of an impending gross failure of the pressure boundary. Therefore, the presence of any PRESSURE BOUNDARY LEAKAGE requires the unit to be promptly placed in COLD SHUTDOWN. R226

3/4.4.7 CHEMISTRY

The limitations on Reactor Coolant System chemistry ensure that corrosion of the Reactor Coolant System is minimized and reduces the potential for Reactor Coolant System leakage or failure due to stress corrosion. Maintaining the chemistry within the Steady State Limits provides adequate corrosion protection to ensure the structural integrity of the Reactor Coolant System over the life of the plant. The associated effects of exceeding the oxygen, chloride and fluoride limits are time and temperature dependent. Corrosion studies show that operation may be continued with contaminant concentration levels in excess of the Steady State Limits, up to the Transient Limits, for the specified limited time intervals without having a significant effect on the structural integrity of the Reactor Coolant System. The time interval permitting continued operation within the restrictions of the Transient Limits provides time for taking corrective actions to restore the contaminant concentrations to within the Steady State Limits.

1. All nonplugged tubes that previously had detectable wall penetrations (greater than 20%).

2. Tubes in those areas where experience has indicated potential problems.

3. A tube inspection (pursuant to Specification 4.4.5.4.a.8) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

4. Indications left in service as a result of application of the tube support plate voltage-based repair criteria shall be inspected by bobbin coil probe during all future refueling outages. R213

c. The tubes selected as the second and third samples (if required by Table 4.4-2) during each inservice inspection may be subjected to a partial tube inspection provided:

1. The tubes selected for these samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found.

2. The inspections include those portions of the tubes where imperfections were previously found.

Note: Tube degradation identified in the portion of the tube that is not a reactor coolant pressure boundary (tube end up to the start of the tube-to-tubesheet weld) is excluded from the Result and Action Required in Table 4.4-2. R181

d. Implementation of the steam generator tube/tube support plate repair criteria requires a 100 percent bobbin coil inspection for hot-leg and cold-leg tube support plate intersections down to the lowest cold-leg tube support plate with known outside diameter stress corrosion cracking (ODSCC) indications. The determination of the lowest cold-leg tube support plate intersections having ODSCC indications shall be based on the performance of at least a 20 percent random sampling of tubes inspected over their full length. R213

e. Inspection of dented tube support plate intersections will be performed in accordance with WCAP 15128, Revision 2, dated February 2000. This alternate repair criteria is applicable to Cycle 11 and 12 operation.

The results of each sample inspection shall be classified into one of the following three categories:

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.

R213

4.4.5.4 Acceptance Criteria

a. As used in this Specification:

1. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

2. Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.

3. Degraded Tube means a tube containing imperfections greater than or equal to 20% of the nominal wall thickness caused by degradation.

4. % Degradation means the percentage of the tube wall thickness affected or removed by degradation.

5. Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

6. Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service and is equal to 40% of the nominal tube wall thickness. Plugging limit does not apply to that portion of the tube that is not within the pressure boundary of the reactor coolant system (tube end up to the start of the tube-to-tubesheet weld). This definition does not apply to tube support plate intersections if the voltage-based repair criteria are being applied. Refer to 4.4.5.4.a.10 for the repair limit applicable to these intersections. For Cycle 11 and 12 operation, this definition does not apply for axial PWSCC indications, or portions thereof, which are located within the thickness of dented tube support plates which exhibit a maximum depth greater than or equal to 40 percent of the initial tube wall thickness. Refer to 4.4.5.4.a.11 for the repair limits applicable to these intersections. R181 R213

7. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 4.4.5.3.c, above.

8. Tube Inspection means an inspection of the steam generator tube from the point of entry (hot leg side) completely around the U-bend to the top support of the cold leg.

9. Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

10. Tube Support Plate Plugging Limit is used for the disposition of an alloy 600 steam generator tube for continued service that is experiencing predominately axially oriented outside diameter stress corrosion cracking confined within the thickness of the tube support plates. At tube support plate intersections, the plugging (repair) limit is based on maintaining steam generator tube serviceability as described below:

    a. Steam generator tubes, whose degradation is attributed to outside diameter stress corrosion cracking within the bounds of the tube support plate with bobbin voltages less than or equal to the lower voltage repair limit (Note 1), will be allowed to remain in service.

    b. Steam generator tubes, whose degradation is attributed to outside diameter stress corrosion cracking within the bounds of the tube support plate with a bobbin voltage greater than the lower voltage repair limit (Note 1), will be repaired or plugged, except as noted in 4.4.5.4.a.10.c below. R213

    c. Steam generator tubes, with indications of potential degradation attributed to outside diameter stress corrosion-cracking within the bounds of the tube support plate with a bobbin voltage greater than the lower voltage repair limit (Note 1), but less than or equal to upper voltage repair limit (Note 2), may remain in service if a rotating pancake coil inspection does not detect degradation. Steam generator tubes, with indications of outside diameter stress corrosion-cracking degradation with a bobbin coil voltage greater than the upper voltage repair limit (Note 2) will be plugged or repaired.

    d. Not applicable to SQN.

    e. If an unscheduled mid-cycle inspection is performed, the following mid-cycle repair limits apply instead of the limits identified in 4.4.5.4.a.10.a, 4.4.5.4.a.10.b, and 4.4.5.4.a.10.c.

The mid-cycle repair limits are determined from the following equations:

$$V_{MURL} = \frac{V_{SL}}{1.0 + NDE + Gr\frac{(CL-\Delta t)}{CL}}$$

$$V_{MLRL} = V_{MURL} - (V_{URL} - V_{LRL})\frac{(CL - \Delta t)}{CL}$$

where:

V_{URL}	=	upper voltage repair limit
V_{LRL}	=	lower voltage repair limit
V_{MURL}	=	mid-cycle upper voltage repair limit based on time into cycle
V_{MLRL}	=	mid-cycle lower voltage repair limit based on V_{MURL} and time into cycle
Δt	=	length of time since last scheduled inspection during which V_{URL} and V_{LRL} were implemented
CL	=	cycle length (the time between two scheduled steam generator inspections)
V_{SL}	=	structural limit voltage
Gr	=	average growth rate per cycle length
NDE	=	95-percent cumulative probability allowance for nondestructive examination uncertainty (i.e., a value of 20-percent has been approved by NRC)

R213

Implementation of these mid-cycle repair limits should follow the same approach as in TS 4.4.5.4.a.10.a, 4.4.5.4.a.10.b, and 4.4.5.4.a.10.c.

Note 1: The lower voltage repair limit is 1.0 volt for 3/4-inch diameter tubing or 2.0 volts for 7/8-inch diameter tubing.

Note 2: The upper voltage repair limit is calculated according to the methodology in GL 90-05 as supplemented. V_{URL} may differ at the TSPs and flow distribution baffle.

11. Primary Water Stress Corrosion Cracking (PWSCC) Tube Support Plate Plugging Limit is used for the disposition of an Alloy 600 steam generator tube for continued service that is experiencing predominantly axially oriented PWSCC at dented tube support plate intersections as described in WCAP 15128, Revision 2, dated February 2000. This alternate repair criteria is applicable to Cycle 11 and 12 operation.

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plug all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 4.4-2.

4.4.5.5 Reports

a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

b. The complete results of the steam generator tube inservice inspection shall be submitted to the Commission in a Special Report pursuant to Specification 6.9.2 within 12 months following the completion of the inspection. This Special Report shall include:

1. Number and extent of tubes inspected.

2. Location and percent of wall-thickness penetration for each indication of an imperfection. R213

3. Identification of tubes plugged.

c. Results of steam generator tube inspections which fall into Category C-3 shall be reported pursuant to Specification 6.6.1 prior to resumption of plant operation. The written followup of this report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence. R28

d. For implementation of the voltage-based repair criteria to tube support plate intersections, notify the staff prior to returning the steam generators to service should any of the following conditions arise:

1. If estimated leakage based on the projected end-of-cycle (or if not practical using the actual measured end-of-cycle) voltage distribution exceeds the leak limit (determined from the licensing basis dose calculation for the postulated main steam line break) for the next operating cycle. R213

2. If circumferential crack-like indications are detected at the tube support plate intersections.

3. If indications are identified that extend beyond the confines of the tube support plate.

4. If indications are identified at the tube support plate elevations that are attributable to primary water stress corrosion cracking.

5. If the calculated conditional burst probability based on the projected end-of-cycle (or if not practical, using the actual measured end-of-cycle) voltage distribution exceeds 1×10^{-2}, notify the NRC and provide an assessment of the safety significance of the occurrence.

R213

e. For implementation of the depth-based repair criteria for axial PWSCC at dented TSPs, the results of the condition monitoring and operational assessments will be reported to the NRC within 120 days following completion of the inspection. The report will include tabulations of indications found in the inspection, tabulations of tubes repaired and left in service under the ARC, and growth rate distributions for indications found in the inspection as well as the growth distributions used to establish the tube repair limits. Any corrective actions found necessary in the event that condition monitoring requirements are not met will be identified in the report.

where V_{GR} represents the allowance for flaw growth between inspections and V_{NDE} represents the allowance for potential sources of error in the measurement of the bobbin coil voltage. Further discussion of the assumptions necessary to determine the voltage repair limit are discussed in GL 95-05.

The mid-cycle equation of SR 4.4.5.4.a.10.e should only be used during unplanned inspection in which eddy current data is acquired for indications at the tube support plates. R213

SR 4.4.5.5 implements several reporting requirements recommended by GL 95-05 for situations which NRC wants to be notified prior to returning the S/Gs to service. For SR 4.4.5.5.d., Items 3 and 4, indications are applicable only where alternate plugging criteria is being applied. For the purposes of this reporting requirement, leakage and conditional burst probability can be calculated based on the as-found voltage distribution rather than the projected end-of-cycle voltage distribution (refer to GL 95-05 for more information) when it is not practical to complete these calculations using the projected EOC voltage distributions prior to returning the S/Gs to service. Note that if leakage and conditional burst probability were calculated using the measured EOC voltage distribution for the purposes of addressing GL Sections 6.a.1 and 6.a.3 reporting criteria, then the results of the projected EOC voltage distribution should be provided per GL Section 6.b(c) criteria.

Wastage-type defects are unlikely with proper chemistry treatment of the secondary coolant. However, even if a defect should develop in service, it will be found during scheduled inservice steam generator tube examinations. Plugging will be required for all tubes with imperfections exceeding the repair limit defined in Surveillance Requirement 4.4.5.4.a. R213 The portion of the tube that the plugging limit does not apply to is the portion of the tube that is not within the RCS pressure boundary (tube end up to the start of the tube-to-tubesheet weld). R181 The tube end to tube-to-tubesheet weld portion of the tube does not affect structural integrity of the steam generator tubes and therefore indications found in this portion of the tube will be excluded from the Result and Action Required for tube inspections. It is expected that any indications that extend from this region will be detected during the scheduled tube inspections. Steam generator tube inspections of operating plants have demonstrated the capability to reliably detect degradation that has penetrated 20% of the original tube wall thickness.

Tubes experiencing outside diameter stress corrosion cracking within the thickness of the tube support plate are plugged or repaired by the criteria of 4.4.5.4.a.10. R213

The steam generator tube repair limits for primary water stress corrosion cracking (PWSCC) of SR 4.4.5 represents a steam generator tube alternate repair criteria for greater than or equal to 40 percent deep PWSCC indications which are located within the thickness of tube support plates. The repair bases for PWSCC are not applicable to other types of localized tube wall degradation located at the tube-to-tube support plate intersections.

The ARC includes completion of a condition monitoring assessment to determine the end-of-cycle (EOC) condition of the tube bundle. An operational assessment is completed to determine the need for tube repair on a forward-fit basis. The ARC is based on the use of crack depth profiles obtained from Plus Point analyses. Burst pressures and leak rates are calculated from depth profiles by searching the total crack length for the partial length that

results in the lowest burst pressure and the longest length that would tear through-wall at steam-line break conditions. The repair bases for PWSCC at dented TSP intersections is obtained by projecting the crack profile to the end of the next operating cycle and determining if the projected profile meets the requirements of WCAP 15128, Revision 2, dated February 2000. The following provides the limits and bases for repair established in the WCAP analyses:

Freespan Indication Repair Limits

The tube will be repaired if the crack length outside the dented TSP is ≥40% maximum depth.

Crack Length Limit for ≥40% Maximum Depth

The crack length limit for ≥40% maximum depth indications is defined as 0.375 inch from the centerline of the TSP. This limit defines the edges of the TSP thickness of 0.75 inch for Model 51 S/Gs. It is acceptable for the crack to extend to both edges of the TSP as long as the maximum depth of the crack outside the TSP is <40% maximum depth and the requirements for EOC conditions are acceptable.

Operational Assessment Repair Bases

If the indication satisfies the above maximum depth and length requirements, the repair bases is then obtained by projecting the crack profile to the end of the next operating cycle and determining the burst pressure and leakage for the projected profile. The burst pressure and leakage is compared to the requirements in WCAP 15128, Revision 2, dated February 2000. Separate analyses are required for the total crack length and the length outside the TSP due to differences in requirements. If the projected EOC requirements are satisfied, the tube will be left in service.

The results of the condition monitoring and operational assessments will be reported to the NRC within 120 days following completion of the inspection.

Whenever the results of any steam generator tubing inservice inspection fall into Category C-3, these results will be promptly reported to the Commission pursuant to Specification 6.6.1 prior to resumption of plant operation. Such cases will be considered by the Commission on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, and revision of the Technical Specifications, if necessary.

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