

**From:** <sarvers@firstenergycorp.com>  
**To:** <ljb@nrc.gov>  
**Date:** 6/1/01 2:11PM  
**Subject:** Draft RAI SG Response

Attached is the draft to the LAR 289/161 RAI concerning steam generators. Provided this is acceptable, the letter will be formally transmitted following our signature cycle. If you have questions, or require any clarification, please feel free to contact me on (724) 682-5293.

Steve Sarver

(See attached file: AttRAI5.doc)

**CC:** <sepelakb@firstenergycorp.com>, <cosgrovet@firstenergycorp.com>, <musulinm@firstenergycorp.com>, <kammerdeinerg@firstenergycorp.com>

**Mail Envelope Properties**

(3B17DABF.258 : 1 : 49752)

**Subject:** Draft RAI SG Response  
**Creation Date:** 6/1/01 2:11PM  
**From:** <sarvers@firstenergycorp.com>

**Created By:** sarvers@firstenergycorp.com

**Recipients**

nrc.gov  
owf4\_po.OWFN\_DO  
LJB (Lawrence Burkhart)

firstenergycorp.com  
kammerdeinerg CC  
musulinm CC  
cosgrovet CC  
sepelakb CC

**Post Office**  
owf4\_po.OWFN\_DO

**Route**  
nrc.gov  
firstenergycorp.com

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	325	06/01/01 02:11PM
AttRAI5.doc	29696	
Header	841	

**Options**

**Expiration Date:** None  
**Priority:** Standard  
**Reply Requested:** No  
**Return Notification:** None

**Concealed Subject:** No  
**Security:** Standard

**Letter L-01-073 - Attachment A**  
**NRC Request for Additional Information**

In Section 3.6.7.3 (U-Bend Fatigue Evaluation) of Enclosure 1 of L-01-006, the licensee stated that "...a preliminary assessment indicates that the existing 40-percent through wall plugging criterion for steam generator tubes will remain adequate. FENOC will perform a calculation to substantiate the adequacy of the plugging criterion..." The licensee needs to discuss its preliminary assessment and pending calculation regarding the adequacy of the 40-percent through-wall plugging criterion under the power uprate conditions.

**FENOC Response**

At Beaver Valley Power Station, the 40% plugging criterion is applied only to anti-vibration bar (AVB) wear and cold leg thinning (CLT) degradation. All other degradation mechanisms are repaired on detection or per the requirements of tube support plate outside diameter stress corrosion cracking (ODSCC) alternate repair criteria. The preliminary assessment of the 40% plugging criterion is summarized in Section 3.6.7.5 of Enclosure 1 of L-01-006 and is supplemented with the information in the following paragraphs. Calculations will be performed utilizing appropriate uprated parameters to provide a formal revalidation of the 40% repair criterion. These calculations will be completed prior to increasing power above 2652 MWt on the specific unit.

Cold leg thinning is believed to be related to flaw stagnation conditions in the region of the lower peripheral tube support plate regions and localized chemistry conditions. The increase in operating temperature and changes in hydraulic conditions due to uprating are minimal. Furthermore, changes in localized crevice chemistry are also likely to be insignificant. When considering these factors, the 1.4% uprating is expected to have a negligible impact on cold leg thinning initiation or growth. Cold leg thinning degradation initiation and growth are included in the steam generator assessment/inspection program, and any changes in the rates will be evaluated in the condition monitoring/operational assessment reports. To date, no cold leg thinning indications have been reported at Unit 2. The condition monitoring and operational assessment process will continually re-validate the 40% repair limit following the uprating, once inspection data is available at the uprated conditions.

Experience with upratings at other plants has shown that a significant increase in steam flow (>5%) and a significant decrease in steam pressure (>100 psi) can potentially impact the flow-induced tube vibration and result in increased wear at the tube-AVB intersection sites. However, the 1.4% uprating only slightly increases the steam flow rate ( 1.4%) and slightly

decreases the steam pressure. Therefore, the 1.4% uprate will have a negligible impact on the projected AVB wear rate and will not significantly impact future tube wear at the AVB sites. In the unlikely event that AVB wear rate does increase, there remains sufficient margin to detect this condition and effect repairs under the existing inspection/assessment program.

### **NRC Request for Additional Information**

In Section 3.6.7.5 (Inspection Program and Tube Repair Criteria) of Enclosure 1 of L-01-006, the licensee discussed the impact of the power uprate on steam generator tube degradation mechanisms such as anti-vibration bar wear and degradation at the tube support plate intersections. As discussed in the licensee's inspection reports and phone calls, the following degradation was identified in Beaver Valley Unit 1 during the tube inspection performed in the Spring 2000: primary water stress corrosion cracking (PWSCC) in row 1 U-bend, PWSCC at the top of the tubesheet, outside diameter stress corrosion cracking (ODSCC) in the sludge pile region, ODSCC at the tube support plate intersections, and cold leg thinning. The following degradation was identified in Beaver Valley Unit 2 during the inspection performed in the Fall 2000: anti-vibration bar wear, ODSCC at tube support plate intersections, outside diameter degradation at the top of the tubesheet. The licensee needs to discuss the impact of the power uprate on those degradation mechanisms that were not discussed in the January 18, 2001, submittal.

### **FENOC Response**

Besides anti-vibration bar (AVB) wear, tube support plate outside diameter stress corrosion cracking (ODSCC) and cold leg thinning, both Beaver Valley Power Station steam generators have experienced stress corrosion cracking (SCC) degradation that includes sludge pile and expansion transition ODSCC, expansion transition primary water stress corrosion cracking (PWSCC), and small radius U-bend PWSCC. Additionally, a limited number of tubes at both units have exhibited wear from loose parts.

Initiation and growth of stress corrosion cracking degradation mechanisms are significantly influenced by temperature. The increase in  $T_{HOT}$  due to the 1.4% uprating is relatively insignificant ( $< 1.0^{\circ}F$ ) and is expected to have a negligible impact on SCC initiation and/or growth. As stated in Enclosure 1 of L-01-006, the steam generator inspection program will include consideration of increases in  $T_{HOT}$  in crack growth rate analyses. Certainly any observed change in degradation initiation and growth will be integrated into the operational assessments that are prepared following each steam generator inspection.

Chemistry conditions can also influence SCC initiation and growth. There are no planned changes to the primary or secondary water chemistry regimes associated with the 1.4% uprating. Additionally, there are no significant effects of the 1.4% uprating on primary or secondary water chemistry conditions that would adversely affect steam generator tube degradation. Again, any observed change in steam generator tube degradation initiation or

growth would be integrated into the operational assessments performed following each steam generator inspection.

Changes in hydraulic conditions associated with the 1.4% uprating are not expected to have an adverse effect on steam generator tubes affected by loose parts wear. Previously performed analyses associated with loose parts wear will be revalidated for the hydraulic conditions projected for the 1.4% uprating. This revalidation will be completed prior to increasing power above 2652 MWt on the specific unit.

All degradation mechanisms identified during an inspection are evaluated in the condition monitoring and operational assessments. An integral part of a comprehensive assessment is an understanding of the causes of degradation and the actions necessary to either mitigate the degradation or provide other compensatory measures to ensure structural integrity will be maintained. The Beaver Valley Power Station degradation, condition monitoring and operational assessments will consider and address any changes in degradation mechanisms or wear rates that could arise following the uprate in rated thermal power. Observed changes in steam generator tube degradation initiation and growth following the 1.4% uprating will be evaluated for association with potential effects related to the uprating. Expansion of inspection sampling plans and repairs will be implemented if the results of condition monitoring and/or operational assessments warrant such changes. The operational assessments will demonstrate continued steam generator tube structural integrity at the uprated conditions.