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10 CFR 50.12 10 CFR 50.60 10 CFR 50.61 10 CFR 50.90

July 24, 2001 5928-01-20207

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, DC 20555-0001

Dear Sir or Madam:

- SUBJECT: THREE MILE ISLAND, UNIT 1 (TMI UNIT 1) OPERATING LICENSE NO. DPR-50 DOCKET NO. 50-289 LICENSE AMENDMENT REQUEST NO. 308 - Revision 1 PRESSURE TEMPERATURE OPERATING CURVES
- REFERENCES: 1. Letter, M. E. Warner (AmerGen Energy Company, LLC) to USNRC Document Control Desk, 5928-01-20035, LICENSE AMENDMENT REQUEST NO. 308 - PRESSURE TEMPERATURE OPERATING CURVES, dated March 29, 2001.
	- 2. Letter, M. E. Warner (AmerGen Energy Company, LLC) to USNRC Document Control Desk, 5928-01-20170, LICENSE AMENDMENT REQUEST NO. 308 - ADDITIONAL INFORMATION PRESSURE TEMPERATURE OPERATING CURVES, dated June 27, 2001.

In accordance with 10 CFR 50.4(b)(1), enclosed is Revision 1 to License Amendment Request No. 308 which was submitted in the reference 1 letter.

The purpose of this revision to License Amendment Request 308 is to revise the temperature transition for reactor coolant (RC) pump combinations during cooldowns and to revise the wording for Technical Specification 3.1.12.1 to correct an un-intentional change incorporated in the reference 1 submittal. Each of these changes is outlined in greater detail below.

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Revision of the Temperature Transition for RC Pumps:

The previous submittal (reference 1) had the cooldown transition temperature to no RC pumps at 190'F. This revision changes that transition temperature to 120'F to allow for expanded use of the RC pumps during cooldown that can result in the reduction in outage critical path time while reducing RCP impeller wear from cavitation with only one pump in operation and thus maintaining plant safety. This change requires revision of Enclosure 2 to the reference 1 submittal. This revised Framatome ANP report is included as Enclosure 2 to this letter. This revision of the RC pump trip transition temperature to 120'F was evaluated in accordance with the same methodology, criteria, and input parameters (with the exception of the 190'F transition temperature) as the reference 1 submittal. It should be noted that, while several of the data tables and supporting curves within the Enclosure 2 report changed as a result of this change, the overall composite curves which form the basis for the Technical Specification Figures 3.1-1 and 3.1-2 are only revised to incorporate the effects of the RC pump trip transition temperature change at 120'F rather than 190°F (which includes the additional RC pump combination requirement for cooldowns between 212°F and 120°F identified on Technical Specification Figures 3.1-1 and 3.1-2), and the resulting pressure/temperature coordinate changes for the remainder of the composite curve below 120°F. As stated above, the technical basis for the revised portion of the heatup/cooldown limit curves provided in the enclosed revised Technical Specification Figures 3.1-1 and 3.1-2 remains consistent with the calculation methods, criteria and input utilized to develop the reference 1 submittal curves. The revised sections within the Enclosure 2 report are annotated to aid the review of this revision.

During relatively low temperature RCS operations, the present Technical Specifications require no more than one Reactor Coolant Pump (RCP) be operated per loop. RCP operation at low pressure with either one pump in one RCS loop, or with one RCP in each RCS loop, results in gradual RCP impeller wear from cavitation. The reference 1 proposed Technical Specification changes as well as these revised proposed Technical Specification changes will permit TMI Unit 1 to be operated during Low Temperature Overpressure Protection (LTOP) conditions with two RCPs in operation in a single loop. This change, which has been implemented at all other B&W plants, substantially improves NPSH margin for the RCPs, thereby eliminating impeller cavitation wear.

The change from 190° F to 120° F is necessary to provide additional cooling to the primary system through the extended use of the RC pumps during the plant cooldown. This additional cooling reduces the outage critical path by an estimated approximately 60 hours when compared to the more restrictive 190°F temperature transition limit requested in reference 1 and maximizes two-pump operation during cooldowns to avoid cavitation wear as described above. This change revises Technical Specification pages 3-5 (Bases), 3-5a and 3-5b from the reference 1 submittal. The only change to page 3-5 is to

Reference (7) which is corrected to show the updated FTI Calculation No. 32-5011638 02, and to add the Bases clarification that the RCS "A" hot leg pressure tap assumed in the analysis is conservative and bounds use of RCS "B" hot leg tap. The marked up revised pages are included in Enclosure 1 of this letter.

Revision to the Wording for Technical Specification 3.1.12.1:

Technical Specification Sections 3.1.12.1, 3.1.12.2, and 3.1.12.3 are also revised in the reference 1 submittal to reorganize and clearly delineate the LTOP system protection parameters and applicable conditions. The only intended significant revisions from the existing specifications involved the actual parameter values as described in the reference 1 submittal. However, when making a format revision in attempt to clarify the LTOP protection Technical Specification Section 3.1.12.1 in the reference 1 submittal, an additional operating restriction was unintentionally added which limits pressurizer level to ≤ 100 inches when the High Pressure Injection Pump Breakers are racked out. The purpose of the current Technical Specifications, and the revised Technical Specifications, was to impose the Pressurizer Level limit only when any High Pressure Injection Pump Breakers were racked in. This revision changes Technical Specification page 3-18e from the reference 1 submittal. The marked up revised page is included in Enclosure 1 of this letter.

AmerGen Energy Company, LLC (AmerGen) has concluded that these proposed revisions do not affect the no significant hazards consideration, as described in the reference 2 submittal and performed in accordance with 10 CFR 50.91(a)(1). Additionally, these proposed revisions do not impact the safety evaluation or environmental consideration evaluation provided in the reference 1 submittal. Pursuant to 10 CFR 50.91(b)(1), a copy of this revision to License Amendment Request No. 308 is provided to the designated official of the Commonwealth of Pennsylvania, Bureau of Radiation Protection, as well as the chief executives of the township and county in which the facility is located.

Approval of this license amendment is requested by September 14, 2001, to support implementation prior to exceeding the existing 17.7 EFPY limits and to enable implementation prior to shutdown for the Cycle 14 refueling outage (October 5, 2001) due to the benefits of reduced cavitation wear on the reactor coolant pump impellers at low temperature operation and the improved outage efficiency provided by the proposed changes.

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No new regulatory commitments are established by this submittal. If any additional information is needed, please contact David J. Distel at (610) 765-5517.

Sincerely yours,

Gellrich for Tearge.

Mark E. Warner Vice President, TMI Unit 1

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Enclosures: 1) Affected TMI Unit 1 Technical Specification Pages
2) Framatome ANP Document I.D. 32-5011638-02, T 2) Framatome ANP Document I.D. 32-5011638-02, TMI-1 29 EFPY PT Limits

cc: H. J. Miller, USNRC, Regional Administrator, Region I T. G. Colburn, USNRC, Senior Project Manager, TMI Unit 1 J. D. Orr, USNRC, Senior Resident Inspector, TMI Unit 1 D. Allard, Director, Bureau of Radiation Protection - PA Department Of Environmental Resources Chairman, Board of County Commissioners of Dauphin County Chairman, Board of Supervisors of Londonderry Township File No. 01021

AMERGEN ENERGY COMPANY, LLC

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

Operating License No. DPR-50 Docket No. 50-289 License Amendment Request No. 308 - Revision 1

COMMONWEALTH OF PENNSYLVANIA)) SS: COUNTY OF DAUPHIN)

This License Amendment Request Revision is submitted in support of Licensee's request to change the Technical Specifications for Three Mile Island Nuclear Station, Unit 1. As a part of this revision, proposed marked up pages for the TMI Unit 1 Technical Specifications are also included. All statements contained in this submittal have been reviewed, and all such statements made and matters set forth therein are true and correct to the best of my knowledge.

AmerGen Energy Company, LLC

BY: 1 Sarge / Illbrid

Vice President, TMI Unit 1

Sworn and Subscribed to before me this χ^2 day of χ χ χ χ χ χ 2001. Notary Public / Notarial Seal 2018

Member, Pennsylvanla Association ot Notaries

ENCLOSURE 1

TMI Unit 1 Revised License Amendment Request No. 308 Affected TMI Unit 1 Technical Specification Pages 3-5, 3-5a, 3-5b and 3-18e

Based on the predicted RT_{NDT} after 17.7 effective full power years of operation, the pressure/temperature limits of Figure 3.1-1 and 3.1-2 have been established by FTI calculation, **L**eference No. 7, in accordance with the requirements of 10 CFR 50, Appendix G. Also, see Reference 4. The methods and criteria employed to establish the operating pressure and temperature limits are as described in BAW-10046A, Rev. 2) The protection against nonductile failure is provided by maintaining the coolant pressure below the upper limits of these pressure temperature limit curves. and ASME Code Section XI, Appendix G, as modified by ASME Code Case N-640 and N-588. The pressure limit lines on Figure 3.1-1 and 3.1-2 have been established considering the following:

- A 25 psi error in measured pressure.
- A 12°F error in measured temperature. $b₁$

(RCS"A $IRCS M''$ is most System pressure is measured in dither-loop & hot leg. \mathbf{c} . Conservative and n B Bounds use of

d. Maximum differential pressure between the point of system pressure measurement and the limiting reactor vessel region for the allowable operating pump combinations.

The spray temperature difference restriction, based on a stress analysis of spray line nozzle is imposed to maintain the thermal stresses at the pressurizer spray line nozzle below the design limit. Temperature requirements for the steam generator correspond with the measured NDTT for the shell.

REFERENCES

- UFSAR, Section 4.1.2.4 "Cyclic Loads". (1)
- ASME Boiler and Pressure Code, Section III, N-415 (2)

32-50116382

- BAW-1901, Analysis of Capsule TMI-1C, GPU Nuclear, Three Mile Island Nuclear Station - (3) Unit 1, Reactor Vessel Materials Surveillance Program
- (4) BAW-1901, Supplement 1, Analysis of Capsule TMI-1C, GPU Nuclear, Three Mile Island Nuclear Station - Unit 1, Reactor Vessel Materials Surveillance Program, Supplement 1 Pressure - Temperature Limits.

 $ET_{\mathcal{I}}$ Calculation No. 32-5011059-00, "THI-1 Reactor Vessel Adjusted RT_{NDF} Values for W 2108, Rev. 1, B&WOG Materials Committee Report "Fluence Tracki: 23 and (5)

-129EFPY P/T Limits

'March 1998.

"TMI Cycle 5-11 Final Report," -00. Calculation No. 86-5010023 (6) Fluence, RT_{PI's} and RT_{NDT} per

 (7)

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Amendment No. 29, 134, 157, 176 208

FTI Zalculation No. 5

Amendment 25, 134, 167, 176, 208

 $3-5a$

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Figure 3.1-2

Reactor Coolant Inservice Leak Hydrostatic Test

[Applicable through 29 EFPY]

 $3-5b$

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3.1.12.1 \angle TOP PROTECTION
-3.1.12.3 If the reactor vessel head is installed and $\frac{1}{2}$ $\begin{array}{c|l}\n\mathcal{C} \parallel \mathcal{A} \parallel \mathcal{G} \sim \mathcal{C} \parallel \mathcal{A} \parallel \mathcal{A} \sim \math$ in unless:

COPICATED RCS temperature

 $\overline{\mathcal{R}}$ \in VI $\overline{\mathcal{R}}$ a. MU-V16A/B/C/D are closed with their breakers open, and MU-V217 is closed, and 100

b. Pressurizer level is Allen inches. If pressurizer level is $>$ $\frac{226}{100}$ inches, restore level to \leq $\frac{226}{100}$ inches within 1 hour.

3.1.12.4 The PORV Block Valve shall be OPERABLE during HOT STANDBY, STARTUP, and POWER OPERATION:

- a. With the PORV Block Valve inoperable, within 1 hour either:
	- **1.** restore the PORV Block Valve to OPERABLE status or
	- 2. close the PORV (verify closed) and remove power from the PORV
	- 3. otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- **b.** With the PORV block valve inoperable, restore the inoperable valve to OPERABLE status prior to startup from the next COLD SHUTDOWN unless the COLD SHUTDOWN occurs within 90 Effective Full Power Days (EFPD) of the end of the fuel cycle. If a COLD SHUTDOWN occurs within this 90 day period, restore the inoperable valve to OPERABLE status prior to startup for the next fuel cycle.

Bases

If the PORV is removed from service while the RCS is below $\frac{352}{62}$ sufficient measures are incorporated to prevent severe overpressurization by either eliminating the high pressure sources or flowpaths or assuring that the RCS is open to atmosphere.

The PORV setpoints are specified with to erances assumed in the bases for Technical Specification 3.1.2. Above 287PF (275ºF + 12ºF), the PORV setpoint has been chosen to limit the potential for inadvertent discharge or cycling of the PORV. Other action such as removing the power to the PORV has the same effect as raising the setpoint which also satisfies this requirement. There is no upper limit on this setpoint as the Pressurizer Safety Valves (T.S. 3.1.1.3) provide the required overpressure relief.
 $\sqrt{327}$

Below $47.427595-1295$, the PORV setpoint is reduced to provide the required low temperature overpressure relief when high pressure sources and flowpaths are in service. There is no lower limit on the pressure actuation specified as lower setpoints also provide this same protection.

Amendment No. **7**8, *149***,** *187***, 180**

ENCLOSURE 2

Framatome ANP Document I.D. 32-5011638-02

TMI-1 29 EFPY PT Limits

PURPOSE

This document provides revised input for OP-1102-1 and OP 1102-11, the operator pressure - temperature curves used for maintaining the structural integrity of the reactor vessel, RC pumps, surge line, and decay heat removal system during heatups and cooldowns up through EOL conditions (29 EFPY). This analysis also provides the bases for the final technical specification NDT heatup and cooldown requirements and establishes the PORV set point when operating under Low Temperature Over pressure (LTOP) constraints. The limits provided in this analysis are for heatups and cooldowns with 2/0 RC pump operation (compared to previously used **I** pump operation) at low RC pressures. The primary purpose of Revision 01 was to provided Technical Specification curves (Attachment 2). Revision **1** also provided some other minor corrections discussed on page 3. For Rev. 02, the curves and relating statements were changed to reflect RC pump operation down to 120F during a cooldown. Revision **I** completely replaces Rev. 0 and Rev. 2 completely replaces Rev **1.**

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SUMMARY OF RESULTS

Figures 1 through 4 show the heatup and cooldown limits for normal RC pump operation (2/0, 2/1, and 2/2). Figures 5 and 6 show the cooldown limits for a situation where RC pump(s) have failed (cooldown with 0/2 or any one-pump operation).

The "hard" limits (NDT, LTOP, and subcooling margin) are established conservatively such that they are the same for all heatups and cooldowns and are the same when using either pressure instrument (wide or low range). This analysis assumed that if 2/0 is not available, the plant will not heatup, therefore 2/0 is the only heatup option. The pressure instrument uncertainty on these limits was 4 psi for the low range pressure and 25 psi for the wide range pressure. The low and wide range temperature uncertainties were 7F and 12F, respectively. The wide range uncertainties were applied to the entire range for the NDT and LTOP limits. The subcooling margin assumes no instrument uncertainty (just the required **25F** temperature reduction) per Reference 2. The surge line limit assumes no instrument uncertainty also per Reference 2. The rod drop limits are identical to previous limits used at TMI-1 (per Reference 2). The soft limits (NPSH, seal staging, and DHRS operation) assume the low range uncertainties below 450 psig and the wide range above 450 psig per Reference 2. Since DHRS and seal staging limits are essentially only used in the low range, they will have only low range uncertainties. The low range pressure device (in the pressurizer) must be used for these limits below 450 psig and the wide range (hot leg tap) above 450 psig. A transition zone is provided for the change over between 450 psig and 500 psig (the upper limit of the low range pressure transducer). Since the PORV set point (with its 22 psi opening uncertainty) is 552 psig (or 485 psig if original set points are used), it will limit the LTOP/NDT curves above this pressure while the plant is below the enable temperature. The various limits of operation are listed with notes for each figure. In general, heatups require 2/0 RC pump operation (with the second pump started within **-5** minutes of the first). Due to NPSH concerns relative to the DHRS limit, the **³ rd** RC pump should not be started until after DHRS is terminated and the RCS temperature is greater than 200F. Normal cooldowns require 2/0 RC pump operation (or 0/2 in special circumstances) below 450 psig prior to bringing the DHRS into service. Above 450 psig and 400F, any RC pump combination is permissible. Due to the differences in the two pressure indications (with the pressurizer tap indicating a higher pressure than the hot leg tap by **-15** psi), there will be an additional **-15** psi conservatism in the NDT/LTOP limits when using the pressurizer indication for P-T limits. This is because the location correction was applied as if the hot leg tap was being used in the low range (below 450 psig).

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Results (continued)

The PORV low pressure set point is corrected to the top of the pressurizer (the pressure that opens the PORV). The location correction to both the low and wide range pressure taps for each limit is based on the most conservative correction associated with the pump combinations described on each curve.

Each limit uses the more conservative tube plugging .criteria for the limit (maximum allowable plugging (20% per generator) or cycle 10 specific plugging, whichever provides the worst case correction factor). Per Reference 2, these curves are only for monitoring pressure on the "A" hot leg (or pressurizer) since the "B" hot leg tap will never be used for cooldowns or heatups (as requested by TMI-1 personnel). Note that the PORV set point for LTOP was calculated to be 552 psig but may conservatively remain at 485 psig until the equipment can be modified for this pressure at a later date. This indicated pressurizer level must be equal to or less than 100" while operating below the LTOP enable temperature.

The minimum RCS indicated temperature for RC pump startup during a heatup is 100F and the maximum indicated temperature for RC pump operation during a cooldown is 120F.

Attachment 2 shows the heatup and cooldown composite limit and some appropriate notes for the NDT limits. While the **NDT** limits can be monitored form either the "A" or "B" hot leg, the procedural PT window must use the "A" hot leg (per request from TMI-1). Attachment 2 also shows the ISLH limits with similar notes.

REFERENCES

- 1. FRA ANP Doc. 32-5011029-01 "TMI-1 Uncorrected P-T Limits at 29 EFPY 07/01.
- 2. FRA **ANP** Doc. 51-5010400-02 "TMI-1 Analytical Input Summary" 7/01.
- 3. FRA ANP Doc. 51-1212232-01 "Key Elevations for all Plants" 3/94
- 4. TMI-1 Plant Heatup to 525F procedure 1102-1 Rev 154.
- 5. FRA ANP Doc. 32-5011491-00 "FSPLIT Hydraulic Analysis For TMI-I" 02/01.
- 6. FRA ANP Doc. 32-5009876-00 "TMI-1 LTOP Failed Open MU Control Valve" 02/01.
- 7. FRA ANP Doc. 32-5011059-00 "TMI1 Reactor Vessel ART Values for 23 & 29 EFPY", 01/01.
- **8.** CRANE Tech. Paper 410 Flow of Fluids through Valves, Fittings, & Pipe".
- 9. FRA ANP Doc. 32-5010021-00 "TMI-1 Cy. 5-11 Fluence Calculation" 02/01.
- 10. FRA ANP Doe. 32-1176254-00 "177 FA Plant Hydraulics Model", 1/93.
- 11. TMI-1 Doc. C-1101-220-5360-030 Rev 0 Sheet No 11.
- 12. BAW-2127 "Pressurizer Surge Line Thermal Stratification" 12/90.
- 13. TMI-I Cooldown procedure 1102-11 Rev 123.
- 14. FRA ANP Doc. 32-5001328-00 "Asymmetric SG Tube Plugging" 9/98.
- *15.* FRA ANP Doe. 32-1232660-00 GCALC Calc of Mass Flux Rates" 5/94.
- 16. FRA ANP Doe. 32-5011261-00 "Seal Injection analysis for TMI-I" 2/01.

References 4, 11, and 13 can be obtained through the TMI-1 document control system $\frac{1}{\sqrt{6}}$, Dakes Date 7/23/01

J A Weimer

RECORD OF REVISION

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FTI Doc. 32-5011638-02 **JA** Weimer

DISCUSSION

During heatups and cooldowns, the RCS is effectively at a constant temperature at any given time, however, the RC pressure can vary significantly around the loop. Therefore, the various limits that are location dependent must be corrected to the location of pressure measurement. Due to the fact that the location correction is different to the low (pressurizer) and wide (hot leg) range pressure transducers, the PT limits will have to be established for each location, depending on which instrument is required for P-T monitoring. The pressure indication in the pressurizer should not change as RC pumps are started or stopped and the "A" hot leg tap indication should change by approximately 5 psi during 2/0 pump operation (see unrecoverable loss of path 12 during 2/0 operation in Reference 5). However, the pressures at the limiting locations (e.g., pump suction, downcomer beltline, etc.) can change significantly as pumps are started or stopped. As the RCS pressure increases from the low to high range, there will be a step change associated with the pressurizer to hot leg tap transition location adjustment. There will also be a step change associated with the instrument uncertainty associated with each instrument when transitioning from low to high range. Per reference 2, **NDT** limits will use the wide range uncertainties (25 psi and 12F) even in the low range. Therefore, PT windows will be developed for the following situations.

- 1. A nominal heatup and cooldown PT window will be developed for the low range pressure transducer in the pressurizer for pressures below 450 psig¹. All limits requiring instrument uncertainty except NDT and LTOP will be based on the low range tap's 4 psi uncertainty. The NDT will use a larger uncertainty that will provide for conservative results and a smooth transition to the high range instruments. These limits will also have an additional conservatism (-15 psi^2) based on the fact that they will be corrected to the hot leg tap while the low range pressurizer tap will actually be monitored.
- 2. The second nominal heatup and cooldown PT window will be developed for pressures greater than -450 psig. All applicable limits will be based on the wide range transducers in the "A" hot leg and will be applicable to all possible RC pump operating conditions.
- 3. The third set of PT windows will include the non-standard low range cooldown conditions based on a loss of one or more RC pumps.

The following details the development of the PT limits for TMI-1

CALCULATIONS

PRESSURE LOCATION CORRECTIONS

All the PT window limits apply to different portions or components in the RCS. The limits are calculated at the required locations. However, the plant uses only two locations of indicated pressure, the pressurizer low range tap and the hot leg wide range tap. Therefore, all limits need to be corrected to one or both of these locations. This was accomplished by developing a hydraulics model of the RCS and analyzing it for various temperatures and pump combinations. There are two different hydraulic conditions analyzed for, the maximum allowable SG tube plugging and a minimum SG tube plugging. The minimum plugging will be the SG plugging established in cycle 10. The plant will likely never experience less than cycle 10 plugging (8.43% in SG A and 2.65% in SG B) and therefore it will be considered the minimum percent plugging prior to 29 EFPY

2 As shown below in Table 6, the pressure inside the pressurizer ranges from ~14 to 18 psi higher than the hot leg tap pressure for 2/0 pump operation depending on the temperature (primarily due to elevation differences).

I The low range is acceptable to 500 psig but the PT limits will assume the transition to high range is -450 psig to provide operations with some margin to transfer signals.

The NDT and LTOP limits will use the Cycle 10 hydraulic results because it will produce the highest DP from the beltline to the pressure instruments (e.g., the highest flow rate). The DHRS limits will use Cycle 10 plugging for the same reason. The NPSH and seal staging will use 20% plugged because this will provide the highest DP between the pressure tap and the pump suction locations. The surge line limits, rod drop limits, and subcooling margins do not apply because they are identical to previous requirements (Reference 2).

TMI-1 is permitted to have 15% tube plugging in one SG and 25% in the other. Reference 14 shows that when there is a 10% difference in SG plugging, the pump inlet pressures can vary by as much as 3 psi (see 0%-10% case in Reference 14). However, the pump flow also decreases by -1.5% which in turn reduces the required NPSH. As will be shown below, a \sim 3% flow reduction through the pump at 200F (2/0 operation) increases the available NPSH by **-8** psi and therefore, 1.5% would have -4 psi more NPSH available. Also, since NPSH is a soft limit and a few psi higher or lower will not have a significant effect on the pumps, the 20%/20% case will be used for the 15%/25% plugging case for NPSH calculations. Also, as discussed below, the seal staging limits are believed to have sufficient margin built into them based on the fact the pressure drop across the seal increases when pumps are started; therefore a few psi will not affect these results as they will be well above the limit. Another conservatism applied to this calculation is that the location corrections calculated below for a specific temperature will be rounded up and applied to all temperatures up to the next higher temperature calculated (no interpolation). This will provide conservative DP for most temperatures. Therefore, any small affect on the flow and pressure distribution due to 15% - 25% plugging vs 20% - 20% plugging does not need to be included in the NPSH or seal staging limits.

The base FSPLIT analyses in Reference 5 used the 20% tube plugging. One case at 200F was analyzed for each pump combination with the cycle 10 plugging model (200BE in Table **1** below). The changes (or deltas) in the various pressure differences in the loop was compared to the 20% plugging case and this difference was applied to all temperatures. This will be conservative for all temperatures higher than 200F and slightly non-conservative for the 10OF cases. However, since more tube plugging has occurred since cycle 10 and since the larger DPs occur above 200F (during 3 and 4 pump operation), and since the NDT/LTOP analyses has an additional **-15** psi conservatisms inherent to the calculations at 100F (see discussion below), the final results will be still be conservative for all temperatures.

When no RC pumps are operating, the pressure differences are due solely to elevation differences. The DHRS is approximately 8 ft (of water) below the low range pressure tap, and 38.2 ft below the wide range tap (Reference 3)³. The beltline is an additional 10.5 ft below this point (49.7 ft below the wide range tap. The pump suction is approximately 39.2 ft below the hot leg tap and **-9** ft below the low range pressure indication (at 100" in the pressurizer). The no-pump pressure differences are shown below using 62.5 Ib/cuft density. The calculated beltline and drop line corrections are increased (in the table) so that the 200F 20% tube plug case is the same as the 200F BE case. The same DP correction is then used for all the temperatures.

³ The relative elevation of the wide range tap is 60.46 ft. The relative elevation of the low range pressure (per Reference 2) is \sim 3 ft above the surge line or 30.25 ft. The pump suction is defined as approximately at the horizontal cold leg centerline or 21.25 ft. The center of the hot leg at the drop line is **-I ft** above the horizontal hot leg relative elevation or 22.25 ft

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For **0/1** and 0/2 the drop line nozzle pressure is higher than the indicated pressure (see negative numbers in Table) and therefore it is conservative to use the 20% tube plugging numbers.

****** This 69 psid shows the conservatism that will be included if the low range pressure is monitored.

***The difference between the "200" case and the "200BE" case was applied to the other temperatures.

LTOP

Background

Attachment 1 includes a discussion of the LTOP limit and related topics. If the LTOP 10 minute transient limit (discussed in Attachment 1) is more conservative than the NDT heatup or cooldown limits (e.g. lower pressure allowed), the LTOP will inherently protect against heatup and cooldown NDT limits. Note that the LTOP transient is also dependent on the initial pressurizer level (less than 102 inches for TMI-1), the MU flow rate, and any non-condensable gasses that might be in the pressurizer. LTOP is a concern only below the enable temperature. Attachment **1** discussion assumes that potential HPI tow and CFT flow are locked out below the enable temperature.

Enable Temperature

Per Reference 7, the Adjusted Reference Temperature (ART) is 250.5F (rounded to 251F). Code Case N514 requires that the LTOP limits be in effect when the **%** thickness **(%** T) temperature is less than the ART + 50F. During a cooldown, the coolant temperature is always less than (or equal to) the **%** T temperature and therefore it is conservative to use the coolant temperature as the LTOP enable set point. However, during a heatup, the $\frac{1}{4}$ T temperature is always less than the coolant temperature.. Therefore, the set point must be the water temperature plus the difference in these two locations. Per Reference 1, the maximum $\frac{1}{4}$ T temperature will be 16F lower than the coolant temperature (during a maximum allowable heatup rate). Therefore, the enable temperature will be the ART + 50 + 16. Both cases will assume a 12 F temperature uncertainty (as discussed above) resulting in a cooldown enable temperature of 313F and a heatup temperature of 329F.

LTOP Limit

The LTOP limit establishes two heatup/cooldown criteria. The minimum LTOP limit (at 60F) is the pressure used to establish the PORV set-point when the RCS is below the enable temperature. Also, the failed-open MU control valve transient (discussed in detail in Attachment 1) dictates that the maximum pressure during heatups and cooldowns must be low enough to prevent exceeding the LTOP limit for 10 minutes of full makeup flow (at which time operator action is assumed to terminate the pressurization). When the LTOP curve becomes PORV limited, the margin to the actual LTOP limit increases significantly.

There are five uncorrected steady state LTOP location limits (beltline, axial weld, closure head, outlet nozzle and inlet nozzle) that apply between 60F to the enable temperature (with closure head up to
190F) per Reference 1. The axial flaw is more limiting than any other core region location⁴. The The axial flaw is more limiting than any other core region location⁴. The closure head is more limiting than the axial flaw above 65F (where the closure head is a constant 625 psig). However, since the closure head correction to the hot leg pressure tap is ~35 psid less than the beltline correction (during 2/0 operation) it will not be actually limiting until it is ~35 psi lower than the axial weld or ~660 psig. The closure head location is ~8ft above the hot leg centerline or~4 psi lower than the center line pressure (node 4 in Reference 5). Prior to pump starts, this correction is essentially ~18 ft elevation or 8 psid. In case 200F 2/0 pump operation, node 4 is at 223.3 psia while the hot leg tap is 174.6 psia. This is a DP of (223.3-4) - 174.6 or \sim 45 psid (head closure higher than the hot leg tap pressure) per case T2P200.out in Ref. 5. This makes the correction factor 45 psid compared to ~87 psid for the beltline correction factor or 42 psi difference (conservatively use 35 psi difference). Therefore, during 2/0 operation, when the axial weld limit is greater than 660 psig (625+35), the closure head will dominate, remaining at constant 660 psig until the RCS temperature exceeds 180F (where the head closure limit increases from 625 psig to 1250 psig). Prior to any RCPs operating, when the axial weld is greater than 633 psig (625 **+** 8), the closure head will dominate. The location correction to the hot leg wide range pressure tap are based on **0/0** pumps operating up to 1O0F (where the first two pumps are started) and then based on **2/05** pumps up to 200F and finally 2/1 pumps up to the enable temperature (see Table 2 below). This PT limit is corrected to the RCS "A" hot leg pressure tap (instead of the low range tap in the pressurizer). Since the surge line limit prevents RC pump operation below ~100°F, this was be chosen as the minimum temperature for RC pump operation (see Reference 2). The minimum 3rd pump start was specified at 200F (per Reference 4) but waiting till 250F to start the 3rd pump may provide a larger PT window (see Figure 1). The 4th pump start (for DP correction) will be conservatively set at the enable temperature of 329F for location correction (4th pump start is presently set at 400F per Reference 4). The final operating procedures will have a vertical limit at this enable temperature, which will also include the step pressure change due to increased DP for 4-pump operation (even though the $4th$ pump cannot be started till 400F). Reference 5 shows all the FSPLIT analyses that were used to establish the location correction for the RCS pressure from the "A" hot leg tap to the RV beltline.

Reference 6 defines the pressure difference needed to accommodate the 10-minute failed open makeup control valve transient. The makeup flow rate as a function of RCS pressure and initial pressurizer level used in Reference 6 (100 inches indicated) was based on Reference 2. Reference 6 also assumed no non-condensable gasses in the pressurizer, also based on Reference 2. The flow rates used in this analysis were:

4 Per Reference 9 the actual location of the limiting weld is 30 cm below the beltline or **-1** ft. Therefore, the beltline pressure drop correction will be used for this weld.

⁵ The 0/2 correction factor results in a higher allowable LTOP limit curve. However, since the PORV set point will be established based on the more conservative (lower) 2/0 pump combination, the 10 minute transient will also be established from the 2/0 pump combination for all startup and cooldown pump configurations.

An equation was developed to describe the initial allowable pressure as a function of the final pressure for the 10-minute transient.

$$
Init Press6 = 147058.8\{-1.2588+[1.25882-13.6E-6(-14.404-(Pfinal+14.7))\}0.5\}-14.7
$$

Where P_{final} = the pressure at the end of the 10-minutes of failed open makeup control valve flow (based on Reference 6 inputs) and Init Press is the initial pressure (psig). Setting Pfinal to the maximum allowable LTOP pressure, Reference 1, the LTOP limit can be determined as "Initial Pressure".

Example - for a maximum allowable pressure of 625 psig (Pfinal=625), the 10-minute transient equation would predict 504.2 psig maximum allowable LTOP pressure (Initial Pressure=504) to withstand the 10-minute transient. Figure 1 of Reference 6 shows that an initial pressure of 504 psig (519 psia) will increase in pressure by 121 psi resulting in 625 psig.

Figure 7 shows the maximum allowable initial pressure to permit 10 minutes of full makeup and not exceed the LTOP limit. The bases of this figure is from Table 2 below. Below the enable temperature, the RCS must always be below this pressure when MU is not isolated and the RCS is not opened to atmosphere (see PORV Flowsection below).

Column 3 is the limiting pressure at the temperature of column **1** from Reference 1. Columns 4 through 8 are a list of DP correction factors for different pump combination with the one used in bold print. Column 9 is the solution to the above equation with column 3 being the Pfinal input. Column 10 subtracts the appropriate (bold) correction factors of columns 4 through 8 from columns 9 (for 2/0, 2/1, 212 startup). Column 11 is the same as column 10 except it uses the 0/2, 1/2, 2/2 heatup. Finally, column 12 is the same as column 10 except it is "smoothed" to show limits that do not increase as temperatures decrease.

PORV Set-point

The PORV set-point for LTOP protection must be set at the minimum pressure to ensure the reactor vessel LTOP limits are not violated. The PORV must be set to protect for the minimum allowable pressure. This will be either at 60F (with pumps off), or **1** OOF with 210 pumps operating whichever is the more limiting. At 60F, the LTOP limit is 623 psig (Reference 1). Using the 23 psi correction to the hot leg tap and using the 20 psi set point uncertainty (Reference 2), the PORV must be set at 623-20 23= 580 psig at 60F. At 1OOF, the LTOP limit is 641 psig (Reference 1). Using the 69 psi correction to the pressurizer (low range tap) and using the 20 psi set point uncertainty, the PORV must be set at $641-20-69 = 552$ psig. Note that the pressure in the pressurizer is \sim 18 psi higher than the hot leg tap at **1** OOF 2/0 pump operation per Table **I** above (at 100 inch pressurizer level). Therefore, the location correction to the pressurizer is 87 psi (Table 1) minus 18 or 69 psid. The head of steam to the top of the pressurizer is negligible. The PORV senses the pressurizer pressure and not the hot leg pressure.

⁶ Reference 6 presented the final pressure as a function of initial pressure. Using the quadratic equation, initial pressure was determined was determined as a function of final pressure as shown above.

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*Note that this table includes the heatup enable temperature. As shown on Figure 7, the enable temperature (where the PORV must be at the lower setpoint) could be as low as 313F for cooldowns.

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LTOP Pressurizer Level Vs Pressure (Nitrogen)

When the RCS is filled and vented and the pressurizer has a blanket of nitrogen (vs. steam), the 10 minute transient limit previously defined will not apply. The N_2 will not condense and therefore, will pressurize faster during the MU event. However, TMI-1 will have the MU pumps locked out during this condition (Reference 2) and therefore pressurization with a nitrogen blanket is not a concern.

MU Tank Volume

If the MU tank volume depletes (or the transient is terminated due to MU pump NPSH limits), in less than 10 minutes, the pressurization transient will stop. At the present time, the MU tank volume will allow for more than the 10 minute flow time and cannot be used to minimize the maximum LTOP pressure. However, it is mentioned here to potentially be used in the future if other initial conditions ever change.

PORV Flow

The PORV flow rate must be large enough to prevent pressure excursions created by the water entering the pressurizer (in order to assure that the LTOP limit is maintained). Reference 2 shows that the PORV has a flow area of 0.94 in². Per Reference 8 page A22, the maximum pressure drop at 4857 psig through a contraction/expansion (valve) with a conservatively assumed loss factor of 2 is .59 x 500 psia or 295 psid. This results in a down stream pressure of 205 psia at the choked flow point. Using the sonic velocity equation from Reference 8, $v=(k \times g) \times (44x)P'/rho)^{0.5}$ k= isentropic exponent = 1.27 (page A9 Reference 8), rho = density = 1.078 lb/cuft, P'= 205 psia. V= (1.27 x 32.2 x 144 x 205/1.078) **-** =1058 ft/sec. The maximum volumetric flow (for an area of .94 in2), is 1058 x .94/144 x 60 = 414 cuft per minute. Reference 15 shows that using the critical flow tables (Homogenous Equilibrium Method), the maximum flow is 217 cuft/min. This uses a beta ratio (diameter ratio) of zero, where for all Re numbers above 200 Cd ~0.6 (Reference 8), 500 psia stagnation pressure, and

⁷ This is less than the allowable PORV set point and therefore will be conservative for this calculation. This pressure was used because TMI-1 may elect to maintain the present PORV set point of ~485 psig.

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saturated enthalpy of 1204.6 BTU/lb, the flow rate is 600 lb/sec-ft². This is 600 x .0065 ft² x 60 sec = ²³⁵lb/min. At 1.08 Ib/cuft this is 217 cuft/min. Even with this conservative calculation, the maximum flow rate is much greater than the maximum makeup flow at 500 psig is 275 gpm or 36 cuft per minute. Therefore, the pressurizer pressure will not exceed the set point pressure due to approaching sonic velocities during an LTOP event. The minimum flow area need to pass 36 cuft/min is 36/217 x 0.94 in² = 0.16 in². The PORV should never experience a solid water flow rate under these circumstances because the pressurizer cannot fill (from 100" initial level) during the 10-minute MU transient. Furthermore, the MJ tank will deplete long before the pressurizer fills.

Water Flow

The LTOP scenario is not required fbr protection when an opening in the RCS can pass at least as much water as the MU can supply to the RCS. Using a Beta (diameter) Ratio approaching \texttt{z} ro, flow coeff $C=$ discharge Coeff $C_d = -0.6$

From Reference 8 for Beta-0 F low (gpm)=236 d 2 C x (DP/rho) $^{0.5}\,$ Where d=diameter in inches For 485 psid, 62.1 = rho 275 gpm = $d^2 \times 395.5$ Solving for $d = 0.834$ in resulting in an area of 0.55 in² The same calculation using the critical flow tables (P=500 psia, h=29.5 btu/lb @275 gpm results in an area of 0.54 in²

Final LTOP Limit

The final (enveloping) LTOP limit is shown on Figure 7. It will be 403.9 psig up to IOOF (112F with temperature uncertainty). It will then increase to ~419 psig to be closure head limit at ~137F and maintain this limit until **180F** (192 with uncertainty). It will then increase to the PORV set point of 552 psig at ~200F and remain at this pressure until the RCS temperature exceeds 329F. Figure 7 shows the recommended PT points for plotting.

Cooldown & Heatup NDT

The heatup and cooldown NDT limits were calculated in Reference **¹**for two types of transients, a ramp and a step change. The maximum allowable rates of temperature changes cases are shown in Reference 2 and analyzed in Reference 1. Some initial (preliminary) parameterizations were performed on DHRS initiation and RC pump shut-off to insure conservative results. Reference **¹** analyzed the enveloping worst case of each. The conservatisms used in these analyses are discussed in Reference 2. In general, these analyses used step changes in water temperatures every time a system was started or stopped (e.g., cold water in cold legs just after the first RC pump start, cold water in DHRS just after system initiation, etc.). Similar to the LTOP analyses, the limits of each weld location were compared to find the most limiting. These values were then corrected to reiect the pressure at the hot leg tap. This approach includes an inherent $~15$ psi conservatism when monitoring the low range pressurizer tap. The 12F and 25 psi instrument uncertainties were then added to the curves. Finally, an enveloping "smoothed" curve was generated for both heatup and cooldown.

Figures 8 shows the limiting uncorrected results of Reference **I** for both the ramp and step cooldowns for the axial weld and the closure head limits. Per Reference 1, these are the limiting cooldown NDT requirements in the TMI vessel. Per discussion above, the closure head correction factor is -35 psi less than the beltline correction factor and therefore, the Reference 1 closure head was increased 35 psi to put both curves on the same correction basis. Figures 8 also shows these results with the

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location corrections and the instrument uncertainty included. *The location correction conservatively assumed four RC pump operating down to 329F and then 2/1 (three pumps) down to the 200F, and finally 2/0 down to 120F (analyzed at 110F).* Above 310F, the pressures listing in Table 3 are based on the outlet nozzle; however, the belt line correction factor was conservatively used (both of these sets of data is above the pressurizer safety valve set-point above 310F). The final enveloping CD NDT limit is calculated in Table 3 below. Note that the change from l the 3-pump to 4-pump correction factor was included in the vertical step that occurs at the enable temperature of 329F (even though the 4th pump cannot be operating below 400F). The step at ~235F is due to the DHRS initiation (see Reference **1** for additional discussion). Per Reference 2, the wide range (worst case) uncertainties is applied to the entire range. Similar to the LTOP case, the location correction is to the hot leg tap, which is **-15** psi conservative when monitoring the pressurizer (low range) tap below 450 psig. Figure 8 also shows a set of recommended P-T points to describe the final cooldown limit. Table 3 shows the detailed results of Figure 8.

Figure 9 shows the same results for the heatup **NDT** limits. It includes the limiting uncorrected results from Reference 1, the location corrections and the instrument uncertainty. The location correction assumes that the 2/0 RC pumps start at 100F, the 3rd pump starts at 200F and the 4th pump starts at 329F, the final heatup enable temperature (conservatively below the allowable 400F 4 th pump startup temperature). Figure 9 also shows a set of recommended P-T points to describe the final heatup limit. Table 4 shows the detailed results of Figure 9. Similar to the cooldown limits, above 335F, the pressures listing in Table 4 are based on the outlet nozzle; however, the beltline correction factor was conservatively used (either of these sets of data is above the pressurizer safety valve set-point).

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*The pressures are reduced to provide a "smoothed" curve.

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Combined LTOP, HU, CD, Head Closure Limits

Figure 10 shows the enveloping CD, HU, LTOP limits on the same plot. The LTOP requirements are more limiting than the entire HU or CD limits. The only difference in the procedural NDT/LTOP curves will be the enable temperature (discussed above). The cooldown enable temperature is 313F and the heatup enable temperature is 329F. The final procedures will show the limiting heatup/cooldown LTOP limit as shown on Figure 10. Attachment 2 shows a composite of the heatup and cooldown limits along with some pertinent notes.

In Service Leak Hydro (ISLH)

The ISLH limit is not currently in the TMI-1 heatup and cooldown procedures but is included in the calculation to be consistent with previous requirements to include ISLH calculation (even though they are apparently not used by any procedures). The Reference **1** uncorrected limit and the RC pump location correction are shown on Figure 11. Unlike the HU and CD limits, this curve is the overall limiting PT for all the HU and CD ISLH results from Reference 1. It also assumed the worst case pump start corrections (e.g., 2/0 pumps were operating at IOOF which is conservative for the cooldown where they are off at 120F). This curve is basically limited by the head closure up to **15OF** ² and ramp CD (from belt line) up to ~250F and then ramp HU (from belt line) to 320F, and ramp cooldown (outlet nozzle) for the remainder of the curve. Also, since the head closure was most limiting prior to RC pump starts, it was given an effective zero location correction up to 10OF (RC pump start) and a location correction of 88 psi- 35 psi = 53 psi (based on the 625 psi limit at the head closure) up to 150F. This pressure established the absolute minimum ISLH pressure. Table 5 lists the enveloping ISLH curve. Attachment 2 shows the final ISLH curve from Figure 11 along with some pertinent notes.

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NPSH

This section will develop the minimum allowable NPSH for heatups and cooldowns. The methodology for this development is as follows.

- 1. Determine the flow rate (gpm) for each pump combination at various temperatures from 10OF to 540F. This will be done using FSPLIT (Reference 5) with the RC pump head-capacity curve from Reference 2. FSPLIT will use the 20% tube plugged model from Reference 5 since this will minimize the pump suction pressure due to the additional pressure drop in the **SG.** The reverse loss factor in the RC pump is 12.4 VH based on Reference 10.
- 2. Using the required NPSH data for Westinghouse pumps from Reference 2, determine the required NPSH for each of these flow rates. Note that Figure 6 of Reference 2 is based on 70F water and since the vapor pressure at this temperature is less than **I** psia, this figure is effectively the actual required NPSH (in feet and in psia).
- 3. Vary the pressurizer pressure in FSPLIT until the NPSHr is achieved at the pump suction.
- 4. Monitor the various important pressures around the loop for each of these cases.
- 5. Perform a hand calculation check to assure that the proper NPSHa is being calculated. NPSHa = NPSHr - **1** Cold Leg Velocity Head + Psat.
- 6. Plot the final NPSH requirement as the pressure at the pressurizer tap (low range) and hot leg tap (wide range) vs RCS temperature.

The NPSH for this analysis will be based on a normal heatup with 2/0 and a 2/0 cooldown (or in a pump failure condition with 0/2). These pump combinations will provide less risk to cavitation than the 1 pump operation previously used at TMI-1. This is primarily due to the fact that the NPSHr in the 2/0 pump flow region (~108,000 gpm per pump) is likely based on test data and not extrapolated, as is the case for 130000+ gpm of 1/0 pumps. Furthermore, the extrapolation to the **1** pump flows is on an exponential increase and a small change in the slope in this region results in a large change in required NPSH, thereby allowing for a much larger uncertainty. A small change in slope in the 2/0 NPSHr region results in a small change in the NPSHr.

Pump Flow rates

Reference 2 shows the required NPSH (in feet) of the Westinghouse pumps as a function of pump flow in gpm. The first step is to determine the pump flow rates of the various pump combination at different temperatures. This is achieved by using the FSPLIT RCS model developed in Reference 5.

Sample calculation

Analyze a 1/0 pump combination at 540F coolant temperature with FSPLIT to determine the pump flow rate. Per Table 1 in Reference 5 it is ~135000 gpm. From Figure 6 in Reference 2, this is an NPSHr of approximately 775 ft.

At 540F, (46.8 *lb/ft*3*),* this is 775 x46.8/144 = 251.9 psi NPSH required.

NPSHr = Ppump -Pvapor press +Pvelocity head

At 540F, Pvapor press= 962.8 psia

At 135330 gpm (results from FSPLIT) in a 28" ID pipe (4.276 ft² area, Reference 3), the velocity is 13533017.48/60/4.276= 70.5 it/sec. This results in a VH of 70.52 x 46.8/64.3/144 = 25.1 psi

Therefore, the pump suction pressure P(pump suction) must be at least 251.9+962.8-25.1=1189.6 psia. This pressure is then corrected to the pressure tap location. "hese calculations for all pump combinations and temperatures are shown in Table 6 below.

The FSPLIT analysis for this case (1/0 @ 540F) predicted a 1221 psia at the hot leg tap and 1232.9 psia at the surge line. The pressurizer tap indication is corrected to the 348 ft 10.75 inch location in the pressurizer (Reference 2). Since the required pressurizer level is 100 inches, it is -3 feet above the surge line at 323 ft (see Reference 2). The tap indicates pressure at the 348 ft 10.75 inch elevation or 25 **ft** 10.75 inches above the water level in the pressurizer. The pressurizer water space will be effectively saturated liquid and the steam space saturated steam. The correction factor from
the sums line to the top will be 3.6 x Pho(liquid)/144 – 25.9 ft x Rho (steam)/144. This results in the surge line to the tap will be -3 ft x Rho(liquid) $/144 - 25.9$ ft x Rho (steam)/144. 1231.6 psia or **1216.9** psig at the pressurizer tap [1232.9-(3 x 44.6/144) - (25.9 x2.15 /144) = 1232.9 1.3=1231.6]

Other NPSHr for different flow rates are tabulated below.

The 0/1 pump combination analysis used the same case except the pressure tap and pressurizer were assumed on the B loop and FSPLIT nodes 11 and 13 were used in place of nodes 10 and 12. All these analyses used the 20% tube plugging model to minimize the pressure at the pump suction. When all the fuel assemblies in TMI-1 use the fine mesh debris grids, the pressure drop in the core will increase, decreasing RCS flow rate slightly. This decrease will in turn decrease the pressure drop between the pressure taps and the pump suction. These two effects will decrease the required NPSH and decrease the DP to tap correction, making the present prediction conservative.

This same calculation was performed for 2/0 pump combination (and consequently 0/2), 2/1 (and 1/2) and 2/2 pump combinations for a range of temperatures from 10OF to 540F (the RCS cannot be at a constant temperature above 540F). These results are shown in Table 6 below. One calculation was performed for the **1/1** pump combination to show that the required NPSH is only marginally less than 1/0 and therefore, 1/0 was used for both 1/0 and 1/1 pump combinations (see Reference 5). Table 6 also shows a 200F case using the tube plugging results from Cycle 10 at TMI-1 (shown as a best estimate case). This case was analyzed to show the higher flow (and consequently higher pressure drops in the core and hot legs). These cases were used to modify the calculated pressure changes for the DHRS and NDT limits since lower tube plugging is conservative for these cases.

The NPSHr was plotted on Figures 12 and 13. Figure 12 shows the results of all the pump combinations for the low range indication (with 4 psi pressure and 7F temperature uncertainties) and Figure 13 shows it for the hot leg pressure tap (wide range) with 25 psi and 12F uncertainty. The only case from Figure 13 used in the procedures is the 0/1 pump combination (extrapolated to 570F).

Finally, since the percent degraded head associated Wth the Westinghouse NPSHr curves is not known (it is assumed to be **1** %) it is recommended that operation near the NPSH cure be minimized. When practical, maintain at least 50 psi margin to the NPSH limit (i.e., do not operate 6r long periods of time right on or very close to the NPSH limit).

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DHRS Pressures

Per Reference 2, the maximum allowable pressure in the DHRS is at the decay heat pump discharge and is a function of temperature. The limiting values for this analysis are 505 psig up to 250F, sloping to 470 psig at 300F. Since the limit did not exceed 300F on the previous PT curves, it will stop at 300F in the revised PT limits. Per Reference 2, the total head added by the pump is 350 ft at 3000 gpm and the elevation change from the DH pump to the center of the hot leg (at the drop line) is 50 ft. The unrecoverable losses in the DHRS line is based on TMI calculation C-1101-220-5360-030 Rev 0 Sheet No **11** (Reference **11).** At 3000 gpm it is;

Loss(psid) = (32.79 x (3000/6000)² + 8.35 x (3000/3000)²) x Rho/144 = $(32.79 \times (.5)^2 + 8.35) \times R$ ho/144 = 0.1149 x Rho

Finally, the pressure in the hot leg (at the drop line) is corrected to the low range pressurizer pressure tap. The hot leg pressure is based on the DP calculated in FSPLIT between node 9 (the drop line) and node 12 (the tap). The pressurizer pressure will be calculated as discussed above for **NPSH.** Also, the DHRS limit will always use the low range pressure transmitter since the DHRS system will always be operated below 450 psig.

A sample calculation for 2/0 operation at 200F follows.

Plimit = 505 psig. The pump head at 3000 gpm is 350 ft x 60.14 **lbft³**/144 = 146.17 psid making the allowable pump suction pressure 358.83 psig. The unrecoverable loss in the line to the RCS hot leg is 6.9 psid solving the above equation. The elevation change is 50 **ft** or 20.9 psid, resulting in a pressure of 358.83 -20.88 +6.91 = 344.86 at the hot leg center line above the decay heat drop line. The velocity head of 3000 gpm in the 12 inch pipe (using 0.6013 ft²) is $[(3000 \text{ gal/min})/(7.4805 \text{ gal/ft}^3)]$ */* $.6013$ ft² /60 sec/min]² x 60.14lb/ft³ / 64.4 ft/sec² / 144 in² / ft² = 0.8 psi. This will be neglected. The correction to the pressurizer tap is -53.4 psid (see Table **1** of FSPLIT results above) resulting in 291.46 psig. Table 7 below shows this calculation for each point analyzed. Note from Table **¹**that the DP correction from the drop line to the pressurizer is 47.6 psid for the 20% tube plugging (conservative for NPSH), and 3 psi higher when cycle 10 plugging results are used (less than 20% plugged). The cycle 10 FSPLIT benchmark case from Reference 5 was used to increase the DPs from Table **¹**for the DHRS limits. The final modification to the calculated pressures will be the 4 psi uncertainty or 287.46 psig. When the RCS temperature is 200F+7F uncertainty equal 207F and the limiting pressurizer tap indication for DHRS operation is 290.7 psig. At this condition (2/0 pump operation), the DHRS pump discharge pressure will be 505 psig.

The DHRS limit is a non-symmetric limit during cooldowns. 2/0 and 0/2 will have different limits since the drop line is only on the B loop. During a 2/0 cooldown, the pressure at the drop line is ~50 psi higher than the pressure at the surge line, however, during 0/2 pump operation the drop line pressure is ~45 psi lower than the surge line due to the difference in flow directions. Therefore, the allowable indicated pressure at the pressurizer tap will be ~95 to 100 psi higher in 0/2 than 2/0. Since 0/2 is only permitted during cooldowns, a separate 0/2 limit will be provided for these conditions. DHRS limits for the different pump combinations are shown on Figure 14.

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SUBCOOLING LIMIT

Subcooling margin can be lost if the pressure is too low or temperature too high. Per Reference 2, this limit is based on different temperature indicators than the other limits on the PT curve. Therefore, per Reference 2, the 25F required subcooling margin is essentially the uncertainty and this limit will not utilize any instrument uncertainties. Per conversations with TMI personnel, this curve is

essentially used as a general guide-line and other instrumentation on the control panel is actually used for subcooling margin. This curve is shown on Figures 1 through 6. It is a plot of Psat Vs. Tsat 25F.

SURGE LINE

The surge line limit will be identical to the other B&W plants (per Reference 2) and shown in Reference 12. No instrument uncertainty is needed for the surge line PT as discussed in Reference 2. Also, there is no explicit location correction for the surge line limit when monitoring the "A" loop pressure since the pressure indication is effectively at (or very near) the surge line. Note that per Reference 12, the development surge line limit assumed some violations of this limit would occur during the lifetime of the plant. This curve is shown on Figures 1 through 6. The values used to generate this curve are listed below. Note that the Reference 4 (original TMI-1 curve) surge line curve is slightly different than that suggested by Reference 12.

SEAL STAGING

Reference 16 calculated the RCS low range pressures that would provide -200 psid across the No. **¹** seal. (The minimum required pressure across the seal is 200 psid per the Westinghouse pump

manual). The key element of this prediction is that the seal DP actually increases when the RC pumps start and if 200 psid exists prior to pump start, the DP will exceed 200 psid after pump start. The limit was determined to be 225 psig (low range) when the seal return pressure is established at 40 or greater psig (MU-39-PI1) just prior to pump start. This curve is shown on Figures 1,3 ,5, and 6.

ROD DROP LIMITS

References 4 and 13 show the dissolved gas limit (for rod trip associated problems). Per Reference 2, this limit will be applied exactly as it has in the past. Note that CRDM venting procedures could possibly preclude the need for this limit. Since the CRDM pressure is the same during 2/0 or 0/2 pump operation, this limit will apply to both. This curve is shown on Figures 1, 3, and 5. The values for this limit were interpreted from Reference 4 and are listed below.

Figure 1 2/0, 2/1, Low Range Heatup For TMI-1 29 EFPY

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Note For Figure 1 NDT and LTOP limits include 25 psi and 12F instrument uncertainty.

Surge line and Subcooling margin have no instrument uncertainty associated with them.

DHRS and NPSH have 4 psi and 7F uncertainty.

The seal staging limit assumes that MU-39-PI1 is 40 psig or less when the **1st** RC pump is started. For every psi it is greater than 40 psig, the seal staging pressure (225 psig) should be increased by a psi.

Operate with 2/0 pumps between 10OF and 200F-250F. Do not start **3rd** pump until the DHRS has been secured. Do not start 1st pump until the RCS is ≥ 100 F.

Start the 2nd pump of 2/0 combination within 5 minutes of the 1st pump to minimize cavitation of 1/0 pump operation at these low pressures.

The DHRS limit uses a flow rate of 3000 gpm. A lower flow rate will require a lower limit.

Assure that the automatic pressurizer level control is 100" (or less) and assure that this 100" limit is maintained until the RCS temperature is $\geq 329F$.

This figure assumes a maximum HU ramp rate of 50F/hr or **15F** step increases followed by an 18 minute soak.

Figure 2 2/0, 2/1, 2/2 Wide Range Heatup For TMI-1 29 EFPY

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Note For Figure 2 NDT, LTOP, and NPSH limits include 25 psi and 12F instrument uncertainty.

Surge line and Subcooling margin have no instrument uncertainty associated with them.

Any RC pump combination is permissible above 400F.

Assure that the automatic pressurizer level control is set to 100" (or less) and assure that this 100" limit is maintained till the RCS temperature is $\geq 329F$.

This Figure assumes a maximum **HU** ramp rate of 50F/hr or **15F** step increases followed by an 18 minute soak.

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Figure 3

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Note For Figure 3 NDT and LTOP limits include 25 psi and 12F instrument uncertainty. 12

Surge line and Subcooling margin have no instrument uncertainty associated with them.

Any RC pump combination is permissible above 400F.

DHRS and NPSH have 4 psi and 7F uncertainty.

Do not operate the DHRS until if more than 2 RC pumps are operating.

The DHRS limit uses a flow rate of 3000 gpm. A lower flow rate will require a lower limit.

Terminate the **2nd** pump of the 2/0 combination immediately after stopping the **1St** pump to minimize cavitation of 1/0 pump operation at these low pressures. All pumps must be secured when the RCS 2 temperature is less than *120F.*

Assure that the pressurizer automatic level control is 100" (or less) before cooling to 329F.

This Figure assumes a maximum CD ramp rate of 100F/hr above 255F and 30F/hr below 255F or step changes of 15F with a 9 minute soak above 255F and 15F step changes with a 30 minute soak below 255F.

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Figure 4

Note For Figure 4 NDT, LTOP, and NPSH limits include 25 psi and 12F instrument uncertainty.

Surge line and Subcooling margin have no instrument uncertainty associated with them.

Any RC pump combination is permissible above 400F. Below 400F and 500 psig, see Figure 3 or 5.

Assure that the pressurizer automatic level control is 100" (or less) before cooling to 329F.

This Figure assumes a maximum CD ramp rate of 1 OOF/hr above 255F and 30F/hr below 255F or step changes of **15F** with a 9 minute soak above 255F and **15F** step changes with a 30 minute soak below 255F.

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Note For Figure 5

NDT and LTOP limits include 25 psi and 12F instrument uncertainty.

Surge line and Subcooling margin have no instrument uncertainty associated with them.

Any RC pump combination is permissible above 400F.

DHRS and NPSH have 4 psi and 7F uncertainty.

Do not operate the DHRS until if more than 2 RC pumps are operating..

The DHRS limit uses a flow rate of 3000 gpm. A lower flow rate will require a lower limit.

Terminate the 2nd pump of the 0/2 combination immediately after stopping the 1st pump to minimize cavitation of 1/0 pump operation at these low pressures. All pumps must be secured when the RCS 2 temperature is less than 120F.

Assure that the pressurizer automatic level control is 100" (or less) when the RCS temperature is < 329F.

This Figure assumes a maximum CD ramp rate of 100F/hr above 255F and 30F/hr below 255F or step changes of **15F** with a 9 minute soak above 255F and 15F step changes with a 30 minute soak below 255F.

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Note For Figure 6 NDT, LTOP, limits include 25 psi and 12F instrument uncertainty.

Surge line and Subcooling margin have no instrument uncertainty associated with them.

DHRS and NPSH have 4 psi and 7F uncertainty.

Assure that the pressurizer automatic level control is 100" (or less) when the RCS temperature is < 329F.

If cooldown on this curve is necessary (assuming multiple RC pump failures) do the following:

- Maintain RCS pressure above 400 psig while performing the necessary preliminary steps to initiate DHRS.
- Depressurize below the allowable DHRS limit, initiate the DHRS and terminate RC pump(s) as quickly as possible (since the RC pump will experience cavitation during the depressurization).

This Figure assumes a maximum CD ramp rate of IOOF/hr above 255F and 30F/hr below 255F or step changes of 15F with a 9 minute soak above 255F and **15F** step changes with a 30 minute soak below 255F.

Assure that all RC pumps are secured when the RCS temperature is less than 120F.

Figure 7 LTOP Pressure Limit

Figure 8 **TMI-1 NDT Cooldown Limits**

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Figure 9 **TMI-1 NDT Heatup Limits**

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Figure 11 **TMI-1 NDT ISLH Limits**

Indicated Temperature (F)

FIGURE 13 NPSH Limits (with Wide Range Instr Uncertainty) for all pump **Combinations**

ATTACHMENT **I** LTOP Discussion

The methodology for protecting against LTOP events at B&W designed plants is described in this section. As such, the following elements are presented and discussed.

- o Definition of reactor vessel pressure limit
- o Definition of enable temperature
- o Definition of LTOP transients
- o Consequences of LTOP events
- o Definition of methods to protect the reactor vessel pressure limit

Definition of the Reactor Vessel Pressure Limit

The LTOP allowable pressure versus temperature for the reactor vessel is limited to 100% of the steady-state Appendix G NDT limits (ASME Code Case 640). Thus, the flaw size, critical depth, allowable crack growth, and the calculational methodology are identical to those used in the Appendix G calculations. The use of steady state temperatures, rather than the transient resulting from technical specification heatup and cooldown limits is based on the likelihood that LTOP events occur during steady-state operations. It is not unreasonable to conclude that the likelihood of an LTOP event occurring without notice by plant operations during heatups or cooldowns is small. This steady state approach has been approved by the NRC for B&W and other operating PWR plants.

Definition of Enable Temperature

ASME Code 1995 Edition through 1996 Addendum defines the LTOP enable temperature as the RTndt temperature of the limiting material plus 50°F.

Definition of LTOP Transients

LTOP events occur as the result of equipment malfunction or operator error that results in mass or energy addition to the reactor coolant system. In the B&W plant operating history, only once has the technical specification Appendix G limits been violated due to an LTOP event. Because of restrictions that preclude water-solid operation of the pressurizer (i.e., a steam or nitrogen bubble is maintained with the reactor vessel head on), this plant design is less likely to exceed Appendix G limits.

In the B&W design, mass can be injected into the system through: (1) the four HPI nozzles (one or two of which also serve as normal makeup); (2) the core flood nozzles through which the core flood tank system, decay heat removal system, and low pressure injection system

(LPI) can provide added inventory; and (3) the pressurizer spray nozzle via HPI, LPI, or the nitrogen addition system. Energy can be added to the RCS via: (1) failure of the decay heat removal system; (2) actuation of the pressurizer heaters; and (3) reactor coolant pumps. As a result, the following transients were postulated and evaluated for their potential to increase reactor vessel pressure:

- o Erroneous actuation of the High Pressure Injection (HPI) system
- o Erroneous opening of the core flood tank discharge valve
- o Erroneous addition of nitrogen to the pressurizer
- o Makeup control valve (makeup to the RCS) fails full open
- o All pressurizer heaters erroneously energized
- **⁰**Temporary loss of the Decay Heat Removal System's (DHRS) capability to remove decay heat from the RCS
- o Thermal expansion of the RCS after starting an RC pump due to stored thermal energy in the steam generator

Consequences of LTOP Events

Each of the postulated LTOP events were analyzed to determine the rate of RCS pressure increase and/or the total amount of pressure increase that the system would experience. A stand alone thermal hydraulic model of the pressurizer was used for these predictions. Capabilities to model RCS inventory increases (e.g., makeup, HPI), inventory decreases (e.g., letdown), RCS expansion, and pressurizer heaters were included. A range of initial pressures and pressurizer levels were applied so that the pressurization rates could be applied to different initial P-T operating conditions. A brief summary of each transient response is provided below.

Erroneous actuation of the High Pressure Injection (HPI) system - this event would be the most limiting LTOP transient. However, HPI actuation results in a very rapid pressurization of the RCS and precludes achieving the necessary 10 minutes for operator action. Thus, this event is prevented below the LTOP enable temperature through plant procedures.

Erroneous opening of the core flood tank discharge valve - this event is precluded by closing and locking out the breakers of the motor operated block valves before the RCS pressure decreases below the CFT pressure (600 psig). This will occur prior to cooling below the ART

Erroneous addition of nitrogen to the pressurizer - this event can not overpressurize the RCS because of plant equipment that regulates the nitrogen pressure to 150 psig (i.e., pressure regulator and relief valves).

Makeup control valve (makeup to the RCS) fails full open - this event results in a pressurization rate of 20 to 30 psi/minute and is the most limiting of the remaining LTOP events.

All pressurizer heaters erroneously energized - this event is a slow transient (9 to 12 psi/minute) and is bounded by the failed makeup control valve event.

Temporary loss of the Decay Heat Removal System's (DHRS) capability to remove decay heat from the RCS - this event is a slow transient (7 psi/minute) and is bounded by the failed makeup control valve event.

Thermal expansion of the RCS after starting an RC pump due to stored thermal energy in the steam generator - this event results in a finite increase in pressure that is less than the margin between the Appendix G and LTOP limits. Because of the presence of a pressurizer bubble, this event is much less severe than at other PWRs.

In summary, the most limiting, credible event is the failed open makeup control valve. Because of system design differences, the plant response is sensitive to the makeup pump head-capacity curve and system resistance. This requires each plant to evaluate a plant specific response.

Definition of Methods to Protect the Reactor Vessel Pressure Limit

In general, each plant is equipped with either: (1) a dual setpoint pilot operated relief valve that is set below the LTOP limit, or (2) an additional relief valve (e.g., decay heat removal system relief valve) that is also set below the LTOP limit. In the event of relief valve failure, plant operation is limited (i.e., combination of operating pressure, pressurizer level) such that, in the event of the most limiting LTOP event, failed open makeup control valve, either: (1) ten minutes are available between the time the pressure-temperature operating limits are exceeded and the LTOP limits are violated, thus, providing adequate time for the operator to terminate the event, or (2) the available makeup tank volume would be exceeded and thus terminate the event before the LTOP limit is violated.

Two means of setting operating limits have been used for the failed open makeup control valve. The first approach assumes that the plant is operating at the maximum allowable pressure (as defined by bounds of the Appendix G heatup and cooldown limits and the PORV setpoint) at the time at which the failed open makeup control valve event occurs. Then, using plant specific makeup flow vs. RC pressure curves, the maximum allowable initial pressurizer level that will cause the tenth minute pressure to equal the LTOP pressure is determined. Thus, if the pressurizer level is maintained below this value for temperatures less than the enable temperature and if the RC pressure is less than the Appendix G heatup/cooldown pressure, the LTOP limit will not be exceeded during ten minutes of the failed open makeup control valve event.

The second approach is similar except that the maximum allowable pressurizer level is set and the maximum allowable pressure vs. temperature curve is determined. If this curve results in higher pressures than the Appendix G heatup/cooldown curve, the LTOP limit is

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protected by the Appendix G curves (for this pressurizer level). If this curve results in lower pressures, than this curve is implemented as the limiting operator curve.

In performing either approach, the integrated makeup flow is determined. This allows the makeup inventory that will be exhausted during ten minutes of operation to be determined which can then be used as a means of LTOP protection.

In addition, RCS vent size calculations that will prevent pressurization during the failed open makeup control valve are calculated to provide backup LTOP protection. For example, one plant can prevent RCS pressurization if a 0.75in² vent is available. Thus, if the PORV is declared inoperable, a vent (e.g., steam generator hand-hole) can be opened to protect against LTOP events.

ATTACHMENT 2 **HU** & CD & ISLH COMBINED (SUBMITTAL) CURVES

The following two curves were constructed to assist in the TMI-1 NRC submittal. Figure 3.1-1 is a composite of the limiting points for both the heatup and cooldown NDT limits. Figure 3.1-2 is the same curve as Figure 11 with some notes added. The following table is the bases of the HU/CD curve and Table 5 above is the bases for the ISLH curve. Note that the actual PT analyses started RC pumps at 90F (with the operational limit set to 100F) and the cooldown RC pump limit operation was analyzed at 110F (with the operational limit set to 120F). This will insure a conservative analysis (using the 7F low range temperature limit) compared to actual pumps starts and stops. Also note that the allowable pump combination listed below are not necessarily allowed by procedures for heatups and cooldowns (so as to protect other equipment). The Adjusted Reference Temperature values listed on the figures are from References **1** and 7.

imiting Composite Heatup & Cooldown PT points

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Figure 3.1-1 **Reactor Coolant System Heatup/Cooldown Limitations** [Applicable through 29 EFPY]

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Figure 3.1-2 Reactor Coolant Inservice Leak Hydrostatic Test [Applicable through 29 EFPY]

Indicated Reactor Coolant Inlet Temperature (F)