

August 24, 2001

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

Subject: San Onofre Nuclear Generating Station Units 2 and **3** Docket Nos **50-361** and **50-362** Proposed Change Number **(PCN) 528** Request to revise Technical Specification 5.5.2.15, "Containment Leakage Rate Testing Program"

Gentlemen:

Pursuant to 10 CFR 50.90, Southern California Edison (SCE) hereby requests the following amendment: Revise the calculated peak containment internal pressure related to the design basis loss-of-coolant accident, Pa, from 55.1 psig to 45.9 psig, and the calculated peak containment internal pressure for the design basis Main Steam Line Break from 56.6 psig to 56.5 psig in Technical Specification 5.5.2.15, "Containment Leakage Rate Testing Program." SCE has recalculated the aforementioned peak pressures and determined that the revised pressures are appropriate. SCE has evaluated this request under the standards set forth in 10 CFR 50.92(c) and determined that a finding of "no significant hazards consideration" is justified.

SCE requests the amendment be implemented within 60 days of approval.

SCE is making no formal commitments that would derive from NRC approval of the proposed amendment.

If you have any questions or require additional information, please contact Mr. Jack Rainsberry at 949-368-7420.

Sincerely

P. O. Box 128 San Clemente, CA 92674-0128 949-368-1480 Fax 949-368-1490

Attachments:

- 1. Notarized Affidavits
- 2. Licensee's Evaluation
- 3. Existing Technical Specification page, Unit 2
- 4. Existing Technical Specification page, Unit 3
- 5. Markup of Technical Specification page, Unit 2
- 6. Markup of Technical Specification page, Unit 3
- 7. Retyped Technical Specification page, Unit 2
- 8. Retyped Technical Specification page, Unit 3
- 9. SCE Calculation N-4080-026 Revision 1, including CCN-4, "Containment P-T Analysis For Design Basis LOCA"
- 10. SCE Calculation N-4080-027 Revision 1, including CCN-4, "Containment P-T Analysis For Design Basis MSLB"
- cc: E. W. Merschoff, Regional Administrator, NRC Region IV (less Aft. 9 and 10) C. C. Osterholtz, NRC Senior Resident Inspector, San Onofre Units 2 and 3 (less Aft. 9 and 10)
	- J. E. Donoghue, NRC Project Manager, San Onofre Units 2 and 3
	- S. Y. Hsu, Department of Health Services, Radiologic Health Branch (less Aft. 9 and 10)

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA EDISON COMPANY, ET AL. for a class 103) Docket No. 50-361 License to Acquire, Possess, and Use) a Utilization Facility as Part of (a) Amendment Application No. 211 Unit No. 2 of the San Onofre Nuclear Generating Station)

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.90, hereby submit

Amendment Application No. 211. This amendment application consists of Proposed Change No. PCN-528

to Facility Operating License NPF-10. PCN-528 is a request to revise the calculated peak containment

internal pressures for the design basis loss of coolant accident and main steam line break accident of

Technical Specification 5.5.2.15 for San Onofre Nuclear Generating Station Unit 2.

Subscribed on this $\pi^{t'+1}$ day of $\int |M \wedge N \wedge \int ...$, 2001.

Respectfully Submitted,

SOUTHERN CALIFORNIA EDISON COMPANY

Βv -Dwight **E.** Nunný• **Vice President**

State of California

County of San Diego

before me *I MUr LOM e Son Unet* enersonally appeared , $\bigcup \mathcal{U} \mathcal{M} \mathcal{M}$. Personally known to me to be the person whose name is subscribed to the

within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the

instrument the person, or the entity upon behalf of which the person acted, executed the instrument. WITNESS my hand and official

sea) Signature Maureur State Hand 22 March 1

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Application of SOUTHERN, CALIFORNIA EDISON COMPANY, ET AL, for a class 103 License to Acquire, Possess, and Use a Utilization Facility as Part of Unit No. 3 of the San Onofre Nuclear **Generating Station**

Docket No. 50-362 Amendment Application No. 196

SOUTHERN CALIFORNIA EDISON COMPANY, ET AL. pursuant to 10CFR50.90, hereby submit

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Amendment Application No. 196. This amendment application consists of Proposed Change No. PCN-528

to Facility Operating License NPF-15. PCN-528 is a request to revise the calculated peak containment

internal pressures for the design basis loss of coolant accident and main steam line break accident of

Technical Specification 5.5.2.15 for San Onofre Nuclear Generating Station Unit 3.

day of Subscribed on this 2001.

Respectfully Submitted.

SOUTHERN CALIFORNIA EDISON COMPANY

Bv Dwight E. Nur **Vice President**

State of California

County of San Diego

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 $U \cap V$ personally known to me to be the person whose name is subscribed to the

within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the

instrument the person, or the entity upon behalf of which the person acted, executed the instrument. WITNESS my hand and official

seal.

auan Signature

LICENSEE'S EVALUATION

- 1.0 INTRODUCTION
- 2.0 DESCRIPTION OF PROPOSED AMENDMENT
- 3.0 BACKGROUND
- 4.0 REGULATORY REQUIREMENTS & GUIDANCE
- *5.0* TECHNICAL ANALYSIS
- 6.0 REGULATORY ANALYSIS
- 7.0 NO SIGNIFICANT HAZARDS CONSIDERATION
- 8.0 ENVIRONMENTAL CONSIDERATION
- 9.0 REFERENCES

1.0 INTRODUCTION

This letter is a request to amend Operating Licenses NPF-10 and NPF-15 for San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 & 3), respectively.

The proposed change would revise the Operating Licenses to amend Technical Specification (TS) 5.5.2.15, "Containment Leakage Rate Testing Program," by changing the stated calculated values for peak containment internal pressure for the design basis Loss Of Coolant Accident (LOCA) and Main Steam Line Break (MSLB) accident. The current LOCA value of 55.1 psig would be changed to 45.9 psig and the current MSLB value of 56.6 psig would be changed to 56.5 psig. Southern California Edison has performed recalculations which result in the amended values.

2.0 DESCRIPTION OF PROPOSED AMENDMENT

Southern California Edison (SCE) is requesting a change to the operating licenses for San Onofre Nuclear Generating Station Units 2 and 3 to revise the calculated peak containment internal pressure related to the design basis loss-of-coolant accident, **Pa,** from 55.1 psig to 45.9 psig, and the calculated peak containment internal pressure for the design basis Main Steam Line Break from 56.6 psig to 56.5 psig in Technical Specification 5.5.2.15, "Containment Leakage Rate Testing Program." SCE has recalculated the aforementioned peak pressures and determined that the revised pressures are appropriate.

3.0 BACKGROUND

The NRC issued Amendments 144 and 135 to the operating licenses for SONGS 2 & 3, respectively, on November 6, 1998. These amendments implemented Option B to Appendix J of 10 CFR 50 for SONGS 2 & 3, and added the Containment Leakage Rate Testing Program to the Technical Specifications (TS), including Section 5.5.2.15, which contained values for calculated peak containment internal pressures for the design basis LOCA and the design basis MSLB accident. The former pressure, designated as **Pa,** was given as 55.1 psig. The latter pressure (to which P_a will conservatively be assumed to be equal) was given as 56.6 psig.

The design internal pressure for the SONGS 2 & 3 containment buildings is 60 psig. Calculated internal pressure for the design basis LOCA is determined by SCE in calculation N-4080-026 (Attachment 9) using the Bechtel proprietary computer program COPATTA. Calculated internal pressure for the design basis MSLB accident is determined by SCE in calculation N-4080-027 (Attachment 10), also using the COPATTA program.

The NRC issued Amendments 149 and 141 to the SONGS 2 & 3 operating licenses on February 12, 1999. These amendments, inter alia, authorized a reduction in the minimum cold leg temperature of the Reactor Coolant System (RCS) during power operation. Analyses by ABB CE (now Westinghouse) in support of these amendments documented that mass and energy releases to containment from design basis large LOCA and MSLB events with the plant operating at a reduced cold leg temperature would be bounded by operation at the higher, and still allowed, original cold leg temperature. However, SCE elected to upgrade the design basis containment pressure-temperature response analyses for large LOCA and MSLB events.

Therefore, new mass and energy release rate data were generated by ABB-CE for a spectrum of large LOCA and MSLB events using conservative analysis input parameters from Cycles 9 and 10, including applicable instrument total loop uncertainties and a maximum value for cold leg temperature. These new mass and energy release calculations were performed in conformance with NUREG-0800, Section 6.2.1.3 (LOCA) and Section 6.2.1.4 (secondary system pipe ruptures). Applicable portions of Appendix K methodology described in reports CENPD-132 (Reference 9.1) and CENPD-133 (Reference 9.2), including supplements issued in 1985, were incorporated in the LOCA mass and energy release calculations.

The subsequent recalculations performed by SCE have resulted in the revised peak containment internal pressures being requested by this submittal for inclusion in TS 5.5.2.15.

A discussion of the containment peak pressure analysis, including a description of the COPATTA program, is found in Section 6.2.1.1.3.1 of the SONGS 2 & 3 Updated Final Safety Analysis Report (UFSAR). The calculated design basis peak containment internal pressures are found in Table 6.2-9 of the UFSAR.

4.0 REGULATORY REQUIREMENTS & GUIDANCE

Although SCE was not required to recalculate the design basis peak containment internal pressures, SCE elected to do so using new mass and energy release rate data. The Safety Evaluation Report issued by the NRC for Amendments 149 and 141 for T_{cold} reduction found acceptable the SCE determination that calculated peak containment internal pressures would not be affected by the Amendments. SCE has similarly determined in our April 3, 2001 submittal requesting an increase of 1.4% in the SONGS 2 & 3 licensed power levels that under that proposed change, peak containment internal pressures would be bounded by existing analyses. The NRC approved the requested power uprate in Amendments 180 and 171 issued on July 6, 2001.

An NRC letter (Christopher I. Grimes) to the Nuclear Energy Institute (David J. Modeen) dated November 2, 1995, provides an acceptable format for Technical Specifications establishing a Primary Containment Leakage Rate Testing Program implementing Option B of Appendix J to 10 CFR 50. The format includes a numerical value for Pa, the peak calculated containment internal pressure for the design basis loss of coolant accident. SONGS 2 & 3 adopted this format when Option B was implemented in 1998. Discussions between SCE and NRC staff at that time lead to the inclusion in the SONGS 2 & 3 TS of the numerical value for the peak calculated containment internal pressure for the design basis MSLB accident as well, and a commitment to test to the larger MSLB value.

Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports...," gives guidance on the initial conditions and engineered safety features which should be addressed in a safety analysis of post-accident containment environment. The Safety Evaluation Report issued by the NRC as NUREG-0712 for SONGS 2 & 3 operation finds, in Section 6.2.1.1, "Containment Pressure Analysis," that the COPPATA computer code and its attendant methodology are satisfactory for calculating peak containment internal pressures.

5.0 TECHNICAL ANALYSIS

5.1 Design Basis

The design peak containment internal pressure is 60 psig. The proposed values of 56.5 psig for the MSLB accident and 45.9 psig for the LOCA are less than the design pressure, and also less than the current TS values of 56.6 psig and 55.1 psig, respectively. The methodology used to compute the calculated pressures was approved by the NRC in the Safety Evaluation Report, NUREG-0712, for SONGS 2 & 3 operation.

SCE Calculation N-4080-027 (Attachment 10) evaluates the containment pressure and temperature response to a spectrum of large MSLB events. The analysis utilizes new MSLB mass and energy release data from the Nuclear Steam Supply System (NSSS) vendor (ABB-CE, now Westinghouse). It also utilizes updated passive (structural) heat sink data, incorporates applicable instrument total loop uncertainties, and includes transient containment spray flow modeling not previously used in SONGS $2 \& 3$ analyses. It also incorporates main steam backflow into containment through inter-connected steam piping supplying the turbine-driven auxiliary feedwater pump. Calculated peak containment internal pressure is rounded up to the next higher 0.1 psig.

The calculated results show that the limiting MSLB for containment peak pressure is the 102% of 3390 MWt 8.85 square foot area MSLB with one main steam isolation valve failure to close. This case produces a calculated peak containment internal pressure of 56.5 psig. As was demonstrated in the original plant licensing analyses, the large steam generator mass and energy inventories and large diameter main steam lines in the Combustion Engineering NSSS at SONGS 2 $\&$ 3, combined with accident modeling which provides dry steam flow throughout the event, caused the MSLB event to produce a higher short-term containment internal pressure than that produced by the large break LOCA event.

SCE calculation N-4080-026 (Attachment 9) evaluates the containment pressure and temperature response to a spectrum of LOCAs. The analysis utilizes new LOCA mass and energy release data from the NSSS vendor (ABB-CE, now Westinghouse). The most severe LOCA event for containment design is the Double Ended (Pump) Discharge Leg Slot break with a diesel generator single failure. This event produces a peak containment pressure of 45.9 psig. The Double Ended Hot Leg Slot break with a diesel generator single failure produces a peak containment pressure of 45.8 psig, slightly lower than that from the pump discharge leg break. The hot leg break, however, is slightly more limiting from the standpoint of long-term containment cooldown, and is identified for environmental qualification purposes as the bounding event for post-LOCA long term containment cooldown.

In summary, the NRC has found the computer program and methodology used to calculate peak containment internal pressure to be satisfactory. SCE has recalculated the peak containment internal pressure for the MSLB and LOCA events, resulting in different, somewhat lower, calculated pressures than before. The calculated pressures stated in TS 5.5.2.15 should be revised to the recalculated pressures.

5.2 Risk Information

PCN-528 is not a risk-informed amendment request. Peak containment internal pressures are calculated deterministically.

6.0 REGULATORY ANALYSIS

Southern California Edison (SCE) is requesting a change to the operating licenses for San Onofre Nuclear Generating Station Units 2 and 3 (SONGS 2 $\tilde{\&}$ 3) to revise the calculated peak containment internal pressure related to the design basis loss-of-coolant accident (LOCA), Pa, from 55.1 psig to 45.9 psig, and the calculated peak containment internal pressure for the design basis Main Steam Line Break (MSLB) from 56.6 psig to 56.5 psig in Technical Specification 5.5.2.15, "Containment Leakage Rate Testing Program." SCE has recalculated the aforementioned peak pressures utilizing the Bechtel proprietary computer program COPATTA. The COPATTA code and associated methodology have been reviewed by the NRC staff and approved for use in calculating peak containment internal pressure for design basis accidents.

SCE in its recalculation has used new LOCA and MSLB mass and energy release data from the nuclear steam supply system vendor (ABB-CE, now Westinghouse), conservatively based on the maximum reactor coolant temperature authorized by approved license amendments. The recalculation also utilizes updated passive (structural) heat sink data, incorporates applicable instrument total loop uncertainties, and includes transient containment spray flow modeling not previously used in SONGS 2 $\&$ 3 analyses. The MSLB event analysis also incorporates main steam backflow into containment through inter-connected steam piping supplying the turbinedriven auxiliary feedwater pump.

The design internal pressure for the SONGS 2 $&$ 3 containment buildings is 60 psig. The recalculated values of 45.9 psig for the design basis LOCA and 56.5 psig for the MSLB are less than the design pressure.

SCE has requested and the NRC has approved a revision to the SONGS 2 & 3 operating licenses to change the full power license limit on reactor power from 3390 megawatts thermal to a new limit of 3438 megawatts thermal, an increase of 1.4%. The recalculation of containment internal pressure assumes an initial reactor power level of 102% of 3390 megawatts thermal, and thus bounds the containment internal pressure results under the approved increase in licensed reactor power.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner,

(2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

Southern California Edison has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change would revise the Operating Licenses for San Onofre Nuclear Generating Station Units 2 and 3 to amend Technical Specification (TS) 5.5.2.15, "Containment Leakage Rate Testing Program," by changing the stated calculated values for peak containment internal pressure for the design basis Loss Of Coolant Accident (LOCA) and Main Steam Line Break (MSLB) accident. The current LOCA value of 55.1 psig would be changed to 45.9 psig and the current MSLB value of 56.6 psig would be changed to 56.5 psig.

The proposed change does not affect the probability of occurrence of an accident previously evaluated because it relates solely to the consequences of hypothesized accidents given that the accident has already occurred.

The proposed change does not increase the calculated peak containment internal pressure for the LOCA and MSLB accidents, and thus does not increase their consequences.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change relates to two accidents, MSLB and LOCA, already evaluated in the Updated Final Safety Analysis Report. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

The recalculated peak containment internal pressures for the MSLB and LOCA accidents are less than the containment design pressure and less than the previously calculated pressures. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Southern California Edison concludes that the proposed amendment(s) present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

8.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component, the containment buildings, located within the restricted area, as defined in 10 CFR 20. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

9.0 REFERENCES

- 9.1 CENPD-132, through Supplement 3-P-A, "Calculational Methods For the C-E Large Break LOCA Evaluation Model For the Analysis of **C-E** and W Designed NSSS," June 1985
- 9.2 CENPD-133, through Supplement 5, "CEFLASH-4A, "A FORTRAN77 Digital Computer Program For Reactor Blowdown Analysis," June 1985

SAN ONOFRE NUCLEAR GENERATING STATION PCN-528

EXISTING TECHNICAL SPECIFICATION PAGE, UNIT 2

5.5 Procedures, Programs, and Manuals (continued)

- 5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)
	- d. **-** Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.
	- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.
- 5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by **10** CFR 50.54(o) and **10** CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a , is 55.1 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

- a. The Containment overall leakage rate acceptance criterion is \leq 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are \leq 0.60 L, for the Type B and Type C tests and \leq 0.75 L, for the Type A tests;
- b. Air lock testing acceptance criteria are:
	- 1) Overall air lock leakage rate is \leq 0.05 L_a when tested at \ge P₂.
	- 2) For each door, the leakage rate is \leq 0.01 L, when pressurized to ≥ 9.0 psig.

SAN ONOFRE NUCLEAR GENERATING STATION PCN-528

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EXISTING TECHNICAL SPECIFICATION PAGE, UNIT 3

5.5 Procedures, Programs, and Manuals (continued)

- 5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)
	- d. **_** Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.
	- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.
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The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a , is 55.1 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

- a. The Containment overall leakage rate acceptance criterion is \leq 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are \leq 0.60 L, for the Type B and Type C tests and \leq 0.75 L, for the Type A tests;
- b. Air lock testing acceptance criteria are:
	- 1) Overall air lock leakage rate is \leq 0.05 L, when tested at $\geq P_{a}$.
	- 2) For each door, the leakage rate is \leq 0.01 L_a when pressurized to \ge 9.0 psig.

SAN ONOFRE NUCLEAR GENERATING STATION PCN-528

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5.5 Procedures, Programs, and Manuals (continued)

- 5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)
	- d. **-** Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.
	- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.
- 5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and **10** CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a , is $55.145.9$ psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.65 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

- a. The Containment overall leakage rate acceptance criterion is ≤ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are \leq 0.60 L_a for the Type B and Type C tests and \leq 0.75 L, for the Type A tests;
- b. Air lock testing acceptance criteria are:
	- 1) Overall air lock leakage rate is \leq 0.05 L_a when tested at \ge P_a.
	- 2) For each door, the leakage rate is \leq 0.01 L_a when pressurized to \ge 9.0 psig.

SAN ONOFRE NUCLEAR GENERATING STATION PCN-528

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5.5 Procedures, Programs, and Manuals (continued)

- 5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)
	- d. **-** Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the **LCO** Condition.
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- 5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by **10** CFR 50.54(o) and **10** CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program", dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a , is 55.145.9 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.65 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

- a. The Containment overall leakage rate acceptance criterion is \leq 1.0 L₂. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are \leq 0.60 L_a for the Type B and Type C tests and \leq 0.75 L, for the Type A tests;
- b. Air lock testing acceptance criteria are:
	- 1) Overall air lock leakage rate is \leq 0.05 L_a when tested at $\geq P_{a}$.

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2) For each door, the leakage rate is \leq 0.01 L_a when pressurized to \ge 9.0 psig.

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5.5 Procedures, Programs, and Manuals (continued)

- 5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)
	- d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.
	- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.
- 5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by **10** CFR 50.54(o) and 10 CFR 50, Appendix **J,** Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a, is 45.9 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.5 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_1 , at P_2 , shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

- a. The Containment overall leakage rate acceptance criterion is \leq 1.0 L,. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are \leq 0.60 L_a for the Type B and Type C tests and \leq 0.75 L, for the Type A tests;
- b. Air lock testing acceptance criteria are:.
	- 1) Overall air lock leakage rate is \leq 0.05 L_a when tested at $\geq P_{\lambda}$.
	- 2) For each door, the leakage rate is \leq 0.01 L_a when pressurized to ≥ 9.0 psig.

SAN ONOFRE NUCLEAR GENERATING STATION PCN-528

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RETYPED TECHNICAL SPECIFICATION PAGE, UNIT 3

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5.5 Procedures, Programs, and Manuals (continued)

- 5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)
	- d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the **LCO** Condition.
	- e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.
- 5.5.2.15 Containment Leakage Rate Testing Program

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The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a , is 45.9 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.5 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

- a. The Containment overall leakage rate acceptance criterion is \leq 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are \leq 0.60 L_a for the Type B and Type C tests and \leq 0.75 L_a for the Type A tests;
- b. Air lock testing acceptance criteria are:
	- 1) Overall air lock leakage rate is \leq 0.05 L_a when tested at \ge P_a.
	- 2) For each door, the leakage rate is \leq 0.01 L, when pressurized to \ge 9.0 psig.

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CALCULATION N-4080-026 REVISION 1, INCLUDING CCN-4 CONTAINMENT P-T ANALYSIS FOR DESIGN BASIS LOCA

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

CCN NO. CCN --

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 57 of 248

4.13 Pumped safety injection flow for the various cases, both during the injection phase and the recirculation phase are developed in Calculation #2 of Reference 6.2d. The times for recirculation initiation for the various cases are developed in Calculation #3 of Reference 6.2d, and also reported in Table 21 of Reference 6.2a. The values for the various cases are summarized in the following table:

***Pumped SI flow without charging flow**
** Pumped SI flow including charging flow

⁻ Pumped Charging pumps of auning recirculation "Mass flow at 220°F (sp. Vol. = 0.016775 ft³/Ib_m)

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The mass flow rates provided by ABB-CE are all calculated for water at 100°F which is the temperature of the water in the RWST used as the source for pumped safety injection prior to sump recirculation. During recirculation, the sump water is warmer than 100°F and the lower density of the warmer water will reduce the mass flow rate of recirculated sump water. Based on preliminary results of this P-T calculation (and confirmed by the final results), an appropriately conservative temperature for recirculated sump water is 220°F. The last column of recirculated mass flow rates are calculated for water at 220'F for use in the COPATTA analysis.

As identified by ABB-CE in Reference 6.2a, only the pump discharge leg LOCA directly spills pumped SI water to the containment sump via the broken pump discharge pipe. Prior to recirculation, the direct pumped SI spillage is included in the Card Series 601 spillage table and the pumped SI flow included in the Card Series 801 table is the net pumped SI flow to the RCS without the spillage flow. After start of recirculation, the direct spillage is included in the SI flow shown in the Card Series 801 table, and a spillage fraction of 0.25 (per ABB-CE) is specified for the pump discharge leg break cases.

CALCULATION SHEET

Project or DCP/FCN______ SONGS 2 & 3

Calc. No. N-4080-026

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 61 of 248

FRELIM. CCN NO₂ N-2 PAGE 5 OF 15

CCN CONVERSION:
CCN NO. CCN -

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

Sheet No. D-I of 10

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Subject_Containment P/T Analysis for Design Basis MSLB Events

APPENDIX D

EVALUATION OF IMPACT OF **REDUCED** CCW FLOW TO **CONTAINMENT** ECUs **ON POST-LOCA** LONG-TERM **CONTAINMENT COOLDOWN**

D.1 Purpose

Evaluate the impact of degraded emergency air cooling unit (ECU) heat transfer capability, caused by a reduction in component cooling water (CCW) flow to the ECUs, on the long-term post-LOCA cooldown of containment. The evaluation considers a 6% reduction in ECU heat removal rates when the Spent Fuel Pool Heat Exchanger (SFPHX) is connected to the operating CCW system, and the CCW flow rate to each ECU is reduced from the design basis value of 2000 gpm to a minimum value of 1700 gpm.

D.2 Introduction and Background

AR 991001180 has identified that CCW flow to the containment Emergency Air Cooling Units (ECUs) may by as low as 1700 gpm during post-LOCA long-term containment cooldown. The decrease in ECU cooling water flow below the design basis value of 2000 gpm occurs when the non-critical CCW loop is re-connected to the operating CCW train critical loop to restore cooling to the Spent Fuel Pool Heat Exchanger (SFPHX). Calculation Change Notice CCN **1** to Calculation M-0072-036 (Ref. D. 1) quantifies the reduction in ECU performance to be 5.1% with the containment at 280°F and 4.2% with the containment at 200°F. Assignment 9 of the AR requests Calculation N-4080-026, Revision 1 (containment post-LOCA P-T analysis), be updated to account for a 6% reduction in ECU perfomance, reflecting the potential low CCW flow to the ECUs.

Calculation N-4080-026 currently includes a 2% ECU performance degradation allowance to cover potential COW flows as low as 1900 gpm to the ECUs. The issue of concern is the impact of an additional 4% degradation in ECU performance on long-term containment cooldown following a design basis LOCA event. A slower containment cooldown may adversely impact the qualification status of electrical equipment and components inside containment which are required to remain operable for the duration of the event. It is emphasized that the ECU flow reduction issue has absolutely no impact on short-term containment peak pressures and temperatures calculated in the current analysis. The reduced CCW flow to the ECUs occurs only after the SFPHX is realigned to the CCW system, well after the short-term peak post-accident containment conditions have occurred.

D.3 Summary of Results and Conclusions

It is the conclusion of the evaluation in this Appendix that the long-term containment cooldown results presented in Revision **1** of this calculation, which are based on an ECU performance equal to 98% of the design basis values defined in Revision 0 to M-0072-036 [Ref. D.1, w/o CCN **1),** may be considered to remain bounding, even with CCW flow to the ECUs as low as 1700 gpm versus the design basis flow rate of 2000 gpm per ECU. This conclusion is supported by the discussion of results provided below.

CALCULATION SHEET

ICCN NOT P RELIM. CCN NO N-2 **PAGE 7** OF $\sqrt{5}$

CCN CONVERSION: / **CCN** NO. CCN

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

Sheet No. D-2of 10

Subject Containment P/T Analysis for Design Basis MSLB Events

Table 3-1 of DBD-8023-400 (Ref. D.2) shows the peak post-LOCA heat load on one CCW system train is 151.44x10⁶ Btu/hr, including 54.4x10⁶ Btu/hr from one train of ECUs and 68.4x10⁶ Btu/hr from one SDHX. The combined peak containment post-LOCA heat load is 122.8x10⁶ Btu/hr, or 81% of the CCW heat load. Figures D-5 and D-6 present the ECU and SDHX heat loads on the CCW system taken from the current AOR COPATTA analysis results for the DBA cases **1** (DEDLS LOCA) and 7 (DEHLS LOCA), respectively. The DEDLS LOCA (Case 1) is more limiting with respect to heat load on the CCW system, yielding a peak combined ECU and SDHX heat load of 117x10⁶ Btu/hr at about 7000 seconds (- 2 hours post-LOCA). *[Note: The total containment heat load in Reference D.2 is based on the previous containment LOCA P-T analysis in Supplement A to Revision 0 of this calculation, and is bounding with respect to the current AOR.J* The important point to note is that the high design basis post-LOCA containment heat loads are relatively short-lived. At one day post LOCA the containment heat load on the CCW system had decreased by 35% to about 76x10⁶ Btu/hr. The substantial reduction in CCW heat load with time will result in a corresponding decrease in COW temperature. Any reduction in CCW temperature will increase the effectiveness of the ECUs and the SDHX and increase the rate of containment depressurization and cooldown relative to that documented in the current AQR.

and the CCW temperature also declines in response to the decrease in total CCW heat load.

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3

Calc. No. N-4080-026

CCN CONVERSION:

ICCN NO.

RRELIM. CCN/NO. N-2

CCN NO. CCN-

PAGE 13 or 15

Sheet No. D-Bof IO

Subject Containment P/T Analysis for Design Basis MSLB Events

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3

Calc. No. $N-4080-026$ \vert CCN CONVERSION:

CCN NO. CCN-

 $_{\circ}$ of 15

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Subject Containment P/T Analysis for Design Basis MSLB Events Sheet No. D-9of_/0

DA4 Calculations

The input file for Case 1, the bounding DEDLS LOCA for peak pressure and for Case 7, the bounding DEHLS LOCA for long-term containment cooldown were edited to change the ECU performance table (COPATTA Card Series 1101) to provide heat removal rates equal to 94% of the design basis values provided in Table 1 of calculation M-0072-036, Revision 0 (internal fouling factor of 0.0005). The table below presents the design basis and 94% values used for this evaluation. The ECU heat transfer rates with 2% performance degradation used in the current containment post-LOCA P-T response AOR are shown on page 112 of this calculation.

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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Subject_Containment P/T Analysis for Design Basis MSLB Events

Sheet No. **D-roof** 10

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Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 4 of 248

CALCULATION SHEET

Project or DCP/FCN **SONGS 2 & 3**

 $Calc. No. N-4080-026$ CCN CONVERSION:

CCN NO. CCN --

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 5 of 248

1.1 Obiective

The objective of this calculation is to evaluate the containment pressure and temperature response to a spectrum of large loss of coolant accidents (LOCAs) for SONGS Units 2 and 3, and to identify the limiting LOCA events from the standpoint of maximum containment pressure, vapor and sump water temperatures, and slowest long-term containment cooldown following the LOCA event. The analysis utilizes new LOCA mass-energy release data from ABB-CE [Ref. 6.1], updated passive (structural) heat sink data, incorporates applicable instrument total loop uncertainties (TLUs), and includes transient containment spray flow modeling not previously used in SONGS containment P-T response analyses. The results of this calculation will be used to update LOCA accident analyses reported in sections 6.2 and 3.11 of the UFSAR.

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CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

PRELIM. **CCN NO.** PAGE OF CCN CONVERSION:

ICCN NO.!

CCN **NO.** CCN -

Subject Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 6 of 248

1.2 Criteria, Codes and Standards

The containment structure is designed such that it is capable of withstanding the adverse effects of a postulated LOCA. Applicable regulatory design criteria are provided in Appendix A to 1OCFR Part 50 [Ref. 6.3]. These criteria include:

- **C** General Design Criterion 16, "Containment Design"
- **General Design Criterion 38, "Containment Heat Removal"**
- **General Design Criterion 50, "Containment Design Basis"**

General Design Criterion 16 requires that a reactor containment and associated systems shall be provided to establish an essentially leak tight barrier to assure that the containment design conditions important to safety are not exceeded for as long as the conditions require. Per the Standard Review Plan, NUREG-0800 [Ref. 6.4, Section 6.2.1.1.A], to satisfy the requirements of this criterion, the calculated containment peak pressure after a LOCA should be less than the design containment peak pressure.

General Design Criterion 38 requires that the containment heat removal systems function to rapidly reduce the containment pressure following any LOCA, and maintain the pressure at an acceptably low level. Per Standard Review Plan 6.2.1.1.A, to satisfy the requirements of this criterion requires an analysis to show that the containment pressure can be reduced to less than fifty percent of the containment peak pressure within 24 hours after the start of the LOCA event.

General Design Criterion 50 requires that the reactor containment structure, including access openings, penetrations, and the containment heat removal system, shall be designed so that the containment structure and its internal components can accommodate, without exceeding the design leakage rate and with sufficient margin, the calculated pressure condition resulting from a LOCA. As with Criterion 16, per Standard Review Plan 6.2.1.1.A, to satisfy the requirements of Criterion 50, the calculated containment peak pressure after a LOCA should be less than the design containment peak pressure.

The containment design pressure is 60 psig and the design temperature for the containment liner plate is 300°F per the containment structure DBD (Ref. 6.5, Section 4.1.1.5.2).

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

PRELIM. CON **NO.** PAGE_ OF_

ICCN NO. **CCN**

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 7 of 248

2 **RESULTS/CONCLUSIONS & RECOMMENDATIONS**

2.1 Results/Conclusions

The Results and Conclusions section is divided into two sub-sections. The first sub-section presents a comparison of the LOCA results for all 9 cases. The second sub-section presents detailed results for the bounding pump discharge leg break, the bounding pump suction leg break and the bounding hot leg break.

2.1.1 Overview of Results for all LOCA Cases Analyzed

Table 2.1.1-1 provides a summary of the analysis results for the 9 LOCA cases run for inclusion in UFSAR Section 6.2. The peak pressures have been rounded up to the next 0.1 psig. Peak temperatures are rounded up to the next degree Fahrenheit. The timing of the peak pressure and temperatures are rounded (up or down) to the nearest second. The integrated energy release to the end of blowdown is reported in millions of Btu with 3 decimal places.

Figures 2.1.1-1 through 2.1.1-3 are plots of containment pressure for the three different break locations comparing the results for the three different single failure cases on each graph. Figures 2.1.1-4 through 2.1.1-6 and 2.1.1-7 through 2.1.1-9 are similar plots comparing the containment vapor temperatures and the containment sump water temperatures, respectively.

The results show that the diesel generator single failure cases (single train operation of safety injection, containment spray and emergency air cooling units) produce more severe containment conditions than do the no diesel generator failure cases (dual safety injection train operation) with either a containment spray train failure or an emergency air cooling unit train failure.

Figure 2.1.1-10 compares the containment pressures for the three break locations with the diesel generator single failure (Cases 1, 4, and 7). The results show the Double Ended Discharge Leg Slot (DEDLS) LOCA (Case 1) yields the highest post-LOCA containment pressure of 45.9 psig, occurring at about 267 seconds (about 4.5 minutes) after the LOCA occurs. The Double-Ended Hot Leg Slot (DEHLS) LOCA (Case 7) yields a peak containment pressure of 45.8 psig at 11 seconds, 0.1 psi lower than that produced by the DEDLS break. The Double-Ended Suction Leg Slot (DESLS) LOCA (Case 4) yields the lowest peak containment pressure of 41.6 psig at 152 seconds, 4.3 psi lower than that produced by the DEDLS break. The calculated peak containment pressure for all cases is well below the containment design pressure of 60 psig, satisfying General Design Criterion (GDC) 16 of 1OCFR50, Appendix A. The pressure at one day post-LOCA for all cases is well below 50% of the peak pressure, satisfying GDC 38.

Figure 2.1.1-11 compares the containment vapor temperatures for the same three breaks with the diesel generator single failure. The results show very little difference in short-term peak vapor temperature between the three cases. The DEHLS break produces the highest vapor temperature of 268°F at 12 seconds while the DEDLS break LOCA produces a maximum vapor temperature of 266°F at 264 seconds, and the DESLS break LOCA produces a maximum vapor temperature of

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Subject Containment P/T Analysis for Design Basis LOCA Events

This data may be used as input to containment post-LOCA flooding calculation N-4060-030 [Ref. 6.24]. It should be noted that these values are less limiting than the conservative preliminary values provided in Reference 6.25 for use in preparing revision 1 of the flooding calculation.

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CCN CONVERSION:
CCN NO. CCN --

 $PAGE$ OF

Sheet No. 9 of 248

Subject_Containment P/T Analysis for Design Basis LOCA Events

***** Values from Reference 6.2a

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Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 22 of 248

PRELIM. CCN NO. PAGE__OF_

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CALCULATION SHEET

ICCN NO./
PRELIM. CCN NO.

PAGE __ OF_

CCN CONVERSION: CCN NO. CCN-

Subject_Containment P/T Analysis for Design Basis LOCA Events

Project or DCP/FCN_____ SONGS 2 & 3

Sheet No. 27 of 248

Calc. No. N-4080-026

CALCULATION SHEET EXECUTION **PRELIM.** CON NO.

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CCN CONVERSION:

CCN NO. CCN –

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 29 of 248

PAGE __ OF

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Project or DCP/FCN_____ SONGS 2 & 3 Calc. No. N-4080-026

ICCN CONVERSION:
 ICCN NO. CCN —

Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 30 of 248

PRELIM. CON NO. PAGE OF

I-

CALCULATION SHEET

ICON NO./ PRELIM. CCN NO.

PAGE OF

CCN CONVERSION: CCN NO. CCN --

Project or DCP/FCN SONGS 2 & 3

Calc. No. N-4080-026

Sheet No. 34 of 248

Subject_Containment P/T Analysis for Design Basis LOCA Events

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Time Following LOCA (seconds)

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CCN CONVERSION: <u>CCN NO. CCN</u>

Subject_Containment P/T Analysis for Design Basis LOCA Events

PAGE__OF_

Sheet No. 37 of 248

CALCULATION SHEET

Subject_Containment P/T Analysis for Design Basis LOCA Events

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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026 **CCN** CONVERSION:

Sheet No. 38 of 248

ICCN NO./
PRELIM. CCN NO. PAGE___ OF_

CCN NO. CCN

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

CCN CONVERSION: **CCN** NO. CCN -

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 45 of 248

I

PAGE_OF_

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

026 CCN CONVERSION:

ICCN NO./

CCN NO. CCN -

Subject Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 46 of 248

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2.1.3 Comparison of Results with Previous Analysis of Record

This subsection provides a comparison of the containment pressure, vapor temperature, and sump water temperature for the bounding case for each break location with the results from the previous analysis of record as contained in Revision 0 of this calculation. The bounding cases in the present analysis are for the single failure of a diesel generator (Cases 1, 4, and 7, for the DEDLS, DESLS, and DEHLS LOCAs, respectively). The bounding LOCA identified in Revision 0 of this calculation is the DESLS LOCA with maximum safety injection and diesel generator failure.

Figure 2.1.3-1 compares the containment pressure for Cases 1, 4, and 7 against the previous AOR. The highest short-term peak pressure in the current analysis is 45.9 psig from the DEDLS LOCA, about 9.2 psig lower than the previous AOR value of 55.1 psig. The reduction in peak post-LOCA pressure is partly due to the use of revised LOCA mass-energy calculation methodology by ABB-CE. The methodology changes were reviewed and approved by the Nuclear Regulatory Commission in 1985, and have previously been used by ABB-CE in SONGS large break LOCA reanalyses for ECCS performance (10CFR50, Appendix K). A second contributor to the reduction in peak pressure is the increase in containment passive heat sink mass and area identified in Reference 6.8. A third factor in the pressure reduction is the increased thermal conductivity used for the epoxy paint in containment implemented as a result of a review of available data documented in Reference 6.14. A fourth reason for the lower peak pressures is the ramped flow modeling for the containment spray system incorporated into the revised calculation, supported by Reference 6.21. The higher long-term containment pressure at the end of the analysis reflects the use of an initial containment pressure of 2.1 psig in the current analysis versus zero psig used in the previous AOR.

Figure 2.1.3-2 compares the containment vapor temperature for Cases 1, 4, and 7 with the previous AOR. The lower short-term vapor temperatures are consistent with the lower containment pressures in the new analysis. The highest peak vapor temperature is 268°F with the DEHLS LOCA and 266°F for the DEDLS LOCA. These values are significantly lower than the 295.4'F cited in the previous AOR for the DESLS LOCA. The absence of the sharp short-term temperature spike at 60 seconds seen in the previous AOR is due to the ramped containment spray flow model incorporated into the new analysis. Containment spray flow begins at a low value at 33 seconds and reaches full flow at 60 seconds. The earlier onset of spray flow, even at low rates, moderates the impact of the superheated steam break flow from the cold leg breaks during the vessel reflood period.

Figure 2.1.3-3 compares the containment sump water temperature for Cases 1, 4, and 7 with the previous AOR. The DEHLS LOCA produces the highest sump water temperatures, 261°F for Case 7, prior to sump water recirculation because all safety injection (SI) water must flow through the reactor vessel to reach the hot leg break location. There is no spillage of low enthalpy SI water with a hot leg break as occurs with the cold leg breaks until the SI system is realigned at about 2 hours to provide 50:50 cold leg/hot leg SI flow. Following recirculation, the long-term sump water temperature for all three break locations and the previous AOR are similar with a maximum post recirculation value of about 215'F.

PRELIM. CCN NO. PAGE_OF_

CALCULATION SHEET [

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

6 **CCN CONVERSION:**

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 50 of 248

PRELIM. **CCN NO. PAGE_ OF_**

CCN NO. CCN

ICCN NO

CALCULATION SHEET

Project or DCPIFCN SONGS 2 & 3 Calc. No. N-4080-026 CON CONVERSION:

PRELIM. CCN NO. PAGE OF

CON CONVERSION:
CCN NO. CCN --

Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 51 of 248

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CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

PRELIM. CCN NO. PAGE__OF

ICCN NO.1 \qquad \qquad

026 CCN CONVERSION: **CCN** NO. CCN

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 52 of 248

CALCULATION SHEET FRELIM. CCN NO. PAGE_OF_

Project or DCP/FCN ____ SONGS 2 & 3 Calc. No. N-4080-026

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Subject Containment P/T Analysis for Design Basis LOCA Events

CON CONVERSION:
 CON NO. CCN –
 Sheet No. 53 of 248

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

CCN NO. CCN --

Subject Containment P/T Analysis for Design Basis LOCA Events No. 24 Sheet No. 54 of 248

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4.9 Reactor core decay heat used by the COPATTA program following the end of the ABB-CE supplied mass and energy break flow data is calculated according to the method of NRC Branch Technical Position ASB 9-2, "Residual Decay Heat for Light Water Reactors for Long-Term Cooling" [Ref. 6.4]. A Qattro Pro 8 spreadsheet program was used to perform the calculation and a tabular summary of the results are included in Appendix B. Consistent with NFM calculation N-1020-043 (Ref. 6.19], the decay heat calculation includes delayed neutron fissions in addition to the fission product decay heat and the heavy element decay heat included in BTP ASB 9-2. The decay heat was calculated for the reactor operating 4 effective full power years (Assumption 3) and 100% power to facilitate validation of the spreadsheet program by direct comparison with the results in Reference 6.19. The decay heat values were then increased by 1.02 to conform with the requirements for heat sources in NUREG 0800 [Ref. 6.4, Section 6.2.1.3, part ll.B.1].

Seventeen of the 25 decay heat data points calculated in the spreadsheet and used for COPATTA input were calculated at same shutdown time as values in the Reference 6.19 calculation. A comparison of the spreadsheet values with the NFM calculation values shows excellent agreement with an average difference of only + 0.08% relative to the Reference 6.19 values. It was necessary to calculate additional values not already in the Reference 19 calculation to provide finer input data during the first 5 hours post LOCA to avoid introducing excessive conservatism in the decay heat term with the linear interpolation routine used by the COPATTA program.

4.10 Pipe break mass and energy release data are provided in Reference 6.2a. Data for 9 cases was taken from Reference 6.2a and incorporated into 9 individual COPATTA cases as identified in the following table:

CALCULATION SHEET SECURE FRELIM. CCN NO.1 2 PAGE OF

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

CCN CONVERSION:
CCN NO. CCN -

ICCN NO./
PRELIM. CCN NO.

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 55 of 248

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

CCN NO. CCN-

Subject<u>_Containment P/T Analysis for Design Basis LOCA Events __</u>________________________Sheet No. <u>.56__of_248</u>

 $\frac{1}{2}$ mass flow rate (Ibm/hr) = (flow in gpm)(1 ft³/7.48 gal)(60 min/hr)(1 lb_{ru}/0.016130 ft³) = 497.296 x (flow in gpm)

Calculation N-4080-003, CCN **1** [Ref. 6.12], using bounding times to reach the containment high and high-high pressure analysis set points for the safety injection actuation signal (SIAS) and the containment spray actuation signal (CSAS), indicates that the spray block valves will be fully open within 25 seconds and the containment spray pump will be energized within 25.9 seconds following a design basis LOCA event with loss of power.

The full containment spray flow per train during the injection phase (1600 gpm) is taken from References 6.6 and 6.7 (Section IX.008) and conservatively bounds the minimum plant value of 1606 gpm calculated in Supplement A to calculation M-0014-009 [Ref. 6.21]. The containment spray flow per train during the sump water recirculation phase of the analysis is 1950 gpm [Section IX.008, References 6.7 and 6.8] and this value also bounds the minimum recirculation flow identified in Reference 6.21. The temperature of the water in the refueling water storage tank (RWST) which supplies the containment spray pumps during the injection phase is 100° F per References 6.6 and 6.7 (Section IX.011). As identified in Design Input 4.13, below, a bounding temperature for calculating the mass flow rate of spray water during sump recirculation is 220'F.

A variable containment spray heat transfer efficiency factor, dependent on the containment water vapor to air mass ratio, is included in the COPATTA analysis with the efficiency taken from Figure 2 of Reference 6.17 as recommended by Reference 6.16.

PRELIM. CCN NO. PAGE__OF_

CALCULATION SHEET $\left|\frac{\text{ICCN NO}}{\text{PRELUM. CCN NO}}\right|$ $\left|\frac{P}{PAGE}4\right|$ of $\left|5\right|$

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

ICCN NO. CCN - **I**

Subject_Containment P/T_Analysis for Design Basis LOCA Events **Sheet No. 57 of 248**

4.13 Pumped safety injection flow for the various cases, both during the injection phase and the recirculation phase are developed in Calculation #2 of Reference 6.2d. The times for and also reported in Table 21 of Reference 6.2a. The values for the various cases are summarized in the following table:

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"Pumped Si flow without charging flow nrgges of during recirculation nrgges of during recirculation nrgges of the pumps of during recirculation nrgges of during recirculation nrgges of the pumps of during recirculation nrg

The mass flow rates provided by ABB-CE are all calculated for water at 100°F which is the temperature of the water in the RWST used as the source for pumped safety injection prior to sump recirculation. During recirculation, the sump water is warmer than 100°F and the lower density of the warmer water will reduce the mass flow rate of recirculated sump water. Based on preliminary results of this P-T calculation (and confirmed by the final results), an appropriately conservative temperature for recirculated sump water is 220°F. The last column of recirculated mass flow rates are calculated for water at 220'F for use in the COPATTA analysis.

As identified by ABB-CE in Reference 6.2a, only the pump discharge leg LOCA directly spills pumped **S1** water to the containment sump via the broken pump discharge pipe. Prior to recirculation, the direct pumped SI spillage is included in the Card Series 601 spillage table and the pumped SI flow included in the Card Series 801 table is the net pumped **S1** flow to the RCS without the spillage flow. After start of recirculation, the direct spillage is included in the SI flow shown in the Card Series 801 table, and a spillage fraction of 0.25 (per ABB-CE) is specified for the pump discharge leg break cases.

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CALCULATION SHEET ICCN NO.1 PAGE OF

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

CCN NO. CCN-

PRELIM. CCN NO.

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 58 of 248

4.15 Safety injection tank nitrogen is added to the containment atmosphere over a 10-second interval beginning at 90 seconds post-LOCA. This timing is similar to that recommended by ABB-CE in Table 7 of Reference 6.2d. However, a more conservative calculation of the nitrogen mass release and resultant flow rate is developed in Appendix C and used in this calculation. As shown in Appendix C, the total nitrogen mass release from all 4 SI tanks is 3576 lb_m. This mass release over a 10-second interval yields a mass flow rate of 357.6 lb_m/sec, or 1.2874E6 lb_m/hr. The Card Series 901 table in COPATTA will be used to add the nitrogen. Since the 901 table is designed for air addition to containment, the SI tank nitrogen will be treated by the program as air. Air is about 78% volume nitrogen, 21% volume oxygen and 1% volume argon. Since nitrogen and oxygen have similar molecular weights, and thus also similar to the average molecular weight of air, no significant error will be introduced into the COPATTA analysis by treating the nitrogen mass addition as if it were air.

The temperature of the nitrogen will be conservatively modeled at the initial containment average temperature of 120° F. Nitrogen expansion as the SI tanks are emptied will actually result in cooling of the gas prior to leaving the tank.

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CALCULATION SHEET ICCN NO.!

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

CCN NO. CCN -

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 59 of 248

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5 METHODOLOGY

This calculation uses the Bechtel COPATTA computer program [Ref. **6,15]** to model the containment building response to a spectrum of postulated large loss of coolant accidents (LOCAs). This program is a proprietary program of Bechtel Power Corporation, normally used to analyze the containment response to LOCA and main steam line break (MSLB) events. The COPATTA program was used by Bechtel to support the initial design and licensing of SONGS Units 2 and 3, and has continued to be used by SONGS to perform subsequent evaluations, new calculations and calculation revisions. The COPATTA program is installed and validated on the Nuclear Fuels Department RISC 6000 computer system as described in the COPATTA Software Installation Report, Revision 2 [Ref. 6.18].

The COPATTA program calculates pressure and temperature conditions in two separate regions of the containment building: the containment atmosphere (vapor region) and the containment sump (liquid region). These regions are open systems in a thermodynamic sense since the COPATTA code permits mass flow across region boundaries. Mass and energy are transferred between the liquid and vapor regions by boiling, condensation, or liquid dropout. Each region is assumed homogeneous, but a temperature difference can exist between regions. Any moisture condensed in the vapor region during a time increment is assumed to immediately fall into the liquid region. Non-condensible gas (air) is included in the vapor region. The program models heat transfer to containment structural heat sink materials from the vapor and liquid regions. The performance of containment spray and emergency air cooling unit eontainment heat removal systems are also modeled.

The mass and energy input into the building from the broken primary coolant line is provided by separate ABB-CE calculations [Refs. 6.2b, 6.2c, and 6.2d] and a summary document [Ref. 6.2a]. This data is input into the COPATTA program as a tabular function of time out through the end of initial RCS blowdown for the hot leg breaks and out through the end of post-reflood for the cold leg breaks. Following the end of this initial ABB-CE supplied break flow data, the reactor vessel is modeled as a third region in containment in equilibrium with the containment total pressure. Using tabular inputs of reactor decay heat, sensible heat extraction rates from the primary system and steam generators and safety injection flows, the COPATTA program calculates long term mass and energy input into the containment building.

Two minor contributions to the containment pressure-temperature response are also included. These are (1) a 1% zirconium metal water reaction with the energy input to containment prior to the time of calculated peak containment pressure, and (2) safety injection tank nitrogen gas addition to containment following draining of the **S1** tanks. The SI tank nitrogen only has the potential to impact the peak containment pressure for the cold leg breaks, which occurs after the SI tanks are empty. The peak pressure for the hot leg breaks occurs during the initial RCS blowdown interval, prior to the time the SI tanks are fully drained.

PRELIM. CCN NO. **PAGE OF**

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

ICCN NO./ | PRELIM. CCN NO. PAGE_OF

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Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. **60 of** 248

CALCULATION SHEET PRELIM CON **PRELIM CON NO.**

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

1IccN NO./• PAGE 5 of 15

CCN NO. CCN ·

Sheet No. 61 of 248

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Subject_Containment P/T Analysis for Design Basis LOCA Events **Access 1999 12:3 1 Text** Mo

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Accident", 8/12/98-($(1/24/99)$ Revision 18. "Loss of Coolant 6.24 Calculation N-4060-030, Revision 0, "Containment Flooding Level", 2/11/94 6.25 Memorandum to File, P. Barbour, "Input Data for Containment Flood Level Calculation", dated September 10, 1999

CALCULATION SHEET

Project or DCP/FCN_____ SONGS 2 & 3 Calc. No. N-4080-026

CCN CONVERSION:
CCN NO, CCN --

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 62 of 248

ICCN NO./
PRELIM. CCN NO. PAGE__OF_

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

PRELIM. CCN NO. PAGE OF

CCN CONVERSION:

CCN NO. CCN --

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 63 of 248

I

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

PRELIM. CCN NO. PAGE_OF_

CCN CONVERSION:
 CCN NO. CCN —

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 64 of 248

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PAGE __ OF

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Sheet No. 65 of 248

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Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 66 of 248

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Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 67 of 248

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Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 68 of 248

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Subject_Containment P/T Analysis for Design Basis LOCA Events

PAGE_{__OF}_

Sheet No. <u>70</u> of 248

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CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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Sheet No. 71 of 248

Subject Containment P/T Analysis for Design Basis LOCA Events

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

ICCN NO./
PRELIM. CCN NO. PAGE_OF_

ICCN **NO.** CCN -

Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 72 of 248

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* Time intervals from Table 21 of Reference 6.2a

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The Card Series 201 input tables for each LOCA case are provided below:

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Case 1, DEDLS LOCA wIDG Failure

SLIST POOL=201, **0, 2.47909E7, 2.20E2, 2.47909E7, 2.20E2, 0, 3.11E2, 0, 3.11E2,** 3.42417E8, **5.13E2, 3.38630E8, 6.13E2, 1.42818E7, 1.013E3, 1.** 14450E7, 4.226E3, **6.08605E6,** 1.0026E4, **3.57160E6, 1.9626E4, 2.46029E6,** 4.2260E4, **1.50213E6, 8.8260E4, 7.62653E5,** 9.4260E4, **5.71655E5,**

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

CCN CONVERSION:
CCN NO. CCN --

PRELIM. CCN NO.

Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 74 of 248

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3

Calc. No. N-4080-026

ICCN NO./
PRELIM. CCN NO.

CCN CONVERSION:
CCN NO. CCN --

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 75 of 248

PAGE __ OF

CALCULATION SHEET

Project or DCP/FCN____ SONGS 2 & 3 Calc. No. N-4080-026

PRELIM. CCN NO. PAGE_OF_

I CONVERSION:
CCN NO. CCN -

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 76 of 248

CALCULATION SHEET SEED FREEM CON NOJ PAGE OF

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

PRELIM. CCN NO.

ICCN CONVERSION:
 ICCN NO. CCN --

Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 77 of 248

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CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

026 CCN CONVERSION:
CCN NO. CCN --

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 78 of 248

ICCN NOJ
PRELIM. CCN NO. PAGE OF

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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PRELIM. CCN NO. PAGE_OF_

ICCN NO./

CCN NO. **CCN** -

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 79 of 248

I

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

CON CONVERSION:
CON NO. CCN -

ICCN NO./
PRELIM. CCN NO.

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 80 of 248

PAGE_{___}OF_

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CALCULATION SHEET

PRELIM. CCN NO. **PAGE_OF_**

Project or DCP/FCN_____ SONGS 2 & 3 Calc. No. N-4080-026

CCN CONVERSION:
CCN NO. CCN -

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 81 of 248

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CALCULATION SHEET

ICCN *NOJ* PRELIM. CCN NO. PAGE_OF_

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 82 of 248

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CALCULATION SHEET IIICCN NO./

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:
CCN NO. CCN --

Subject_Containment P/T Analysis for Design Basis LOCA Events Contract Content Content Content Asia of 248

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CALCULATION SHEET

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Project or DCP/FCN____SONGS 2 & 3

Calc. No. N-4080-026 CCN CONVERSION:

ICON NO. **CCN** --

Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 84 of 248

I -

CALCULATION SHEET

ICCN NO./
PRELIM. CCN NO.

PAGE __ OF

Sheet No. 85 of 248

Project or DCP/FCN____SONGS 2 & 3

Calc. No. N-4080-026

CON CONVERSION:
CON NO. CCN -

Subject_Containment P/T Analysis for Design Basis LOCA Events

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

026 CCN CONVERSION:
CCN NO. CCN —

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 86 of 248

I-

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

026 CCN CONVERSION:
CCN NO. CCN --

Subject Containment P/r Analysis for Design Basis LOCA Events

ICCN NO./
PRELIM. CCN NO. PAGE_OF

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

CCN NO. CCN --

PRELIM. CCN NO. PAGE_OF

Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 88 of 248

Case 7, DEHLS LOCA wiDG Failure

Cases 7, 8, and 9 all have the same mass-energy release flow during initial RCS blowdown (0 to 12.2000 seconds). In the case of the hot leg breaks, all steam from the reactor vessel boil-off flows directly to containment without being forced to flow through a steam generator. With no mechanism for the break flow to rapidly extract energy from a steam generator, no reflood/post reflood mass-energy release data is provided by ABB-CE. At the end of initial RCS blowdown, the COPATTA program begins to calculate the break flow using energy inputs from the decay heat and sensible heat tables (Card Series **101** and 201, together with safety injection flows from Card Series 801.

CALCULATION SHEET

Project or DCP/FCN____SONGS 2 & 3

Calc. No. N-4080-026

CCN CONVERSION:
CCN NO. CCN --

ICCN NO./
PRELIM. CCN NO.

Subject_Containment P/T Analysis for Design Basis LOCA Events

PAGE___ OF_

Sheet No. 89 of 248

CALCULATION SHEET

ICCN NO./
PRELIM. CCN NO.

Project or DCP/FCN_____SONGS 2 & 3

Calc. No. N-4080-026

CCN CONVERSION:
CCN NO. CCN -

PAGE_

Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 90 of 248

 OC

CALCULATION SHEET

PRELIM. CCN NO. PAGE OF

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026 CCN CONVERSION:

CCN NO. CCN

Subject Containment P/T Analysis for Design Basis LOCA Events Communication Sheet No. 91 of 248

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5.00168. 1.62186e+08, 642.94, 5.00168, 1.62186e+08, 642.94,
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7.00322, 6.26681e+07, 933.15, 7.00322, 6.26681e+07, 933.15, 8.00322, 4.88578e+07, 923.82, 9.00322, 2.30701e+07, 1111.97, 10.0024, 2.41007e+07, 981.82, 10.2024, 2.23662e+07, 1006.48, 10.4024, 2.02257e+07, 1021.58, 10.6024, 1.73485e+07, 1034.34, 10.8024, 1.23247e+07, 1100.95, 11.0024, 7.76318e+06, 1207.09, 11.1999, 5.11481e+06, 1225.42, 11.4035, 4.37044e+06, 1233.57, 11.6035, 3.80862e+06, 1226.16, 11.8035, 3.16153e+06, 1228.38, 12.0019, 2.49742e+06, 1229.31, 12.2000, 0.00, 1229.31, 1.00001e+07, 0.00, 1229.31,
1.00001e+07, 0.00, 0.00 \$END

CALCULATION SHEET

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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REV **OPJGINATOR DATE** IRE **DATE** REV ORIGINATOR **DATE** IRE **DATE** R **12/17/09** J.M. Climer **12/17/99 CALCLES CALCLES PATE** \downarrow 8.1.13 Card Series 401 Card Series 401 is a table that is used to apportion energy into the reactor vessel water from the core decay heat table (card series 101) and any energy in the metal-water reaction /sensible heat addition table (card series 201). The card series 401 table consists of decay heat multiplier and metal-water reaction multiplier versus time in seconds. A minimum of two data sets are required and a maximum of 20 data sets are permitted. The data are entered in the following order: Time (seconds) Decay Power Multiplier (dimensionless) Metal-Water Reaction/Sensible Heat Multiplier (dimensionless) The decay heat is all added to the reactor vessel water (Section 8.1.10, Card Series 101). All the metal-water reaction energy is added to the containment vapor region (Section 8.1.11, Card Series 201); therefore the multiplier in the 401 table is zero out through the end of the metal water reaction energy interval. The fraction of the sensible heat addition which is input to the reactor vessel water is a variable function of time as determined by the ratio of the sensible heat from the RCS to the sum of the sensible heat from the RCS plus the sensible heat from the steam generator in the broken cold leg loop. These fractions are calculated in the Quattro Pro spreadsheets used to manipulate the data provided by ABB-CE for insertion into the COPATTA input file, In the case of the hot leg LOCA, all sensible heat is input into the reactor vessel water. The Card Series 401 tabular input listing for each LOCA case is provided below, including the

metal-water reaction for the specific case at the beginning of the input table.

Case **1, DEDLS LOCA** wIDG Failure

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Subject_Containment P/T Analysis for Design Basis LOCA Events

Sheet No. 93 of 248

PAGE __ OF

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Subject_Containment P/T Analysis for Design Basis LOCA Events Sheet No. 94 of 248

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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Sheet No. 25 of 248

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CALCULATION SHEET PRELIM. CCN NO. PAGE OF

Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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Subject_Containment P/T Analysis for Design Basis LOCA Events

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Sheet No. 96 of 248

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CALCULATION SHEET

Calc. No. N-4080-026

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Subject_Containment P/T Analysis for Design Basis LOCA Events

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PAGE_{OF}

Sheet No. 97 of 248

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 98 of 248

PRELIM. CCN NO. PAGE_OF_

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

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Sheet No. 99 of 248

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Subject Containment P/T Analysis for Design Basis LOCA Events Sheet No. 100 of 248

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Project or DCP/FCN SONGS 2 & 3 Calc. No. N-4080-026

ICCN CONVERSION:
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PAGE_{OF_}

Sheet No. 101 of 248

Subject_Containment P/T Analysis for Design Basis LOCA Events

