



NUCLEAR ENERGY INSTITUTE

Alex Marion
DIRECTOR, ENGINEERING
NUCLEAR GENERATION DIVISION

September 17, 2001

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

SUBJECT: Steam Generator Degradation Specific Management Database,
Addendum 4

PROJECT NUMBER: 689

Enclosure 1 to this letter transmits Addendum 4 to the Steam Generator Degradation Specific Management Database. This Addendum extends the database for outside diameter stress corrosion cracking at tube support plates previously reported in Addendum 3 of the report. Pulled tube data from one plant with 3/4-inch tubes and one plant with 7/8-inch tubes are added to the database. The data is evaluated against the EPRI data exclusion criteria and indications not excluded on this basis are included in the ARC database and correlations.

The revised databases are used to update the ARC correlations for burst pressure, probability of leakage and SLB leak rate as a function of bobbin coil voltage for both the 3/4 and 7/8 inch diameter tubing. The database changes incorporated in Addendum 4 did not result in any significant, non-conservative shift in the correlations.

No new test results have been obtained for the forces required for axial tensile tearing of cellular indications, and the correlations of Addendum 2 remain applicable for axial tensile tearing.

An update to the probability of detection as a function of bobbin voltage reported in Addendum 3 is provided in this addendum. Very little change is found in the updated POD, which includes twenty-nine inspections compared to twenty-five inspections reported in Addendum 3.

A new EPRI data exclusion Criterion 2c for evaluating data sets against the domestic pulled tube data relative to the potential for leakage at high voltages (above 4 to 5 volts) is presented in this Addendum for NRC review and approval. The currently approved data exclusion criterion is documented in Addendum 2.

Four copies sent to Peter Wen

2046 1/5

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Upon NRC approval, the correlations based on applying Criterion 2c, as given in Section 6 of Addendum 4, would be applied for ARC analyses. Completion of the NRC review for Criterion 2c is requested by late November 2001 in order to include use of the updated correlations in the 90-day reports for fall outages.

The NRC approved industry program defining tube pull requirements in support of the voltage based ARC that replaces the NRC GL 95-05 tube removal requirements is documented in Section 8 of Addendum 4.

The proprietary information in Addendum 4 is supported by the signed affidavits in Enclosure 2. The affidavits set forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity, the consideration listed in paragraph (b)(4) of Section 2.790 of the Commission's regulations. Accordingly, we respectfully request that the information, which is proprietary to EPRI, be withheld from public disclosure in accordance with 10 CFR 2.790. A non-proprietary version of these guidelines is provided in Enclosure 3.

As has been the past practice, we believe any NRC staff review of the enclosed information is exempt from the fee recovery provision contained in 10 CFR Part 170. This submittal provides information that might be helpful to NRC staff when evaluating licensee submittals provided in response to Generic Letter 95-05. Such reviews are exempted under §170.21, Schedule of Facility Fees. Footnote 4 to the Special Projects provision of §170.21 states, "Fees will not be assessed for requests/reports submitted to the NRC...as means of exchanging information between industry organizations and the NRC for the purpose of supporting generic regulatory improvements or efforts."

We would be pleased to meet with you or provide any support necessary to expedite acceptance of the outstanding issues regarding the database. If you have any questions regarding the technical content of this letter, please contact Dr. Govinda Srikantiah of EPRI at (650) 855-2109.

Sincerely,



Alex Marion

JHR/maa
Enclosures

c: Mr. Ted Sullivan, U. S. Nuclear Regulatory Commission
Mr. Kenneth Karwoski, U. S. Nuclear Regulatory Commission

**EPRI/EPSC SAFETY RELATED
CONTROLLED SHIPMENT
PACKING LIST/RECEIPT ACKNOWLEDGMENT**

December 6, 2001

Ship To: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington D.C. 20555-0111

The following items are included in this shipment:

Quantity	Description
1	EPRI to Gene Carpenter at NRC dated August 28, 2001
1	NEI Letter to NRC dated September 17, 2001
5	Non-Proprietary copies of EPRI Report ID# 1006255: Steam Generator Tubing Outside Diameter Stress Corrosion Cracking at Tube Support Plates Data base for Alternate Repair Limits, Update 2001, NP-7480-L, Addendum 4, Interim Report, August 2001
5	EPRI Report ID# 1006255: Steam Generator Tubing Outside Diameter Stress Corrosion Cracking at Tube Support Plates Data base for Alternate Repair Limits, Update 2001, NP-7480-L, Addendum 4, Interim Report, August 2001 Control Copy: D-SGDADD4-2006

Receipt Acknowledgment

The above items were received as listed:

Signature of Recipient

Date of Receipt

Please mail or fax to:

Electric Power Software Center
Attention: Colette M. Handy
3412 Hillview Avenue
Palo Alto, CA 94304
Phone: (650) 855-2137
Fax: (650) 855-1026

Note: This form must be completed and returned within thirty (30) days of receipt in order to satisfy the requirements of the SAIC Quality Assurance Program for the distribution of EPRI Safety-Related products.

ORIGINAL FILE COPY

August 28, 2001

Mr. Gene Carpenter
Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Request for Withholding of Proprietary Information Entitled, "Steam Generator Tubing Outside Diameter Stress Corrosion Cracking at Tube Support Plates Database", Volume 4. TR- 1006255

Dear Mr. Carpenter:

This is a request under 10CFR2.790(a)(4) that the NRC withhold from public disclosure the Information identified in the enclosed affidavit consisting of EPRI owned proprietary information as identified above (the "Information"). A copy of the Information and the affidavit in support of this request are enclosed.

EPRI desires to disclose the Information in confidence to the NRC for informational purposes to assist the NRC. EPRI would welcome any discussions with the NRC related to the Information that the NRC desires to conduct.

The Information is for the NRC's internal use and may be used only for the purposes for which it is disclosed by EPRI. The Information should not be otherwise used or disclosed to any person outside the NRC without prior written permission from EPRI.

If you have any questions about the legal aspects of this request for withholding, please do not hesitate to me at (650) 855-1073. Technical questions on the contents of the Information should be directed to Mr. Govinda Srikantiah (650) 855-2109.

Sincerely,



Kevin Chu
Electric Power Research Institute, Inc.

Encls. (2)
cc: Mr. Govinda Srinkantiah

AFFIDAVIT

RE: Request for Withholding of Proprietary Information Entitled,
Request for Withholding of Proprietary Information Entitled, "Steam
Generator Tubing Outside Diameter Stress Corrosion Cracking at Tube
Support Plates Database", Volume 4, TR- 1006255

I, Kevin Chu, being duly sworn, depose and state as follows:

I am an Attorney at the Electric Power Research Institute, Inc. ("EPRI"), and I specifically have been delegated responsibility for the Information listed above that is sought under this affidavit to be withheld (the "Information") and authorized to apply for its withholding on behalf of EPRI. This affidavit is submitted to the Nuclear Regulatory Commission ("NRC") pursuant to 10 CFR 2.790 (a)(4) based on the fact that the Information consists of trade secrets of EPRI and that the NRC will receive the Information from EPRI under privilege and in confidence.

The basis for withholding such Information from the public is set forth below:

(1) The Information has been held in confidence by EPRI, its owner. All those accepting copies of the Information must agree to preserve the confidentiality of the Information.

(2) The Information is a type customarily held in confidence by EPRI and there is a rational basis therefor. The Information is a type that EPRI holds in confidence by means of a trade secret(s). This information is held in confidence by EPRI because disclosing it would prevent EPRI from licensing the Information and collecting royalties. Such royalty fees allow EPRI to recover its investment. If consultants and/or other businesses providing services in the electric/nuclear power industry were able to publicly obtain the Information, they would be able to use it commercially for profit and avoid spending the large amount of money that EPRI was required to spend in preparation of the Information. The rational basis that EPRI has for classifying the Information as a trade secret(s) is justified by the Uniform Trade Secrets Act, which California adopted in 1984 and which has been adopted by over twenty states. The Uniform Trade Secrets Act defines a "trade secret" as follows:

"Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, or process, that:

(i) Derives independent economic value, actual or potential, from not being generally known to the public or to other persons who can obtain economic value from its disclosure or use; and

(ii) Is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

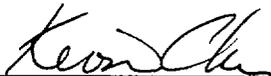
(3) The Information will be transmitted to the NRC in confidence.

(4) The Information is not available in public sources. EPRI developed the Information only after making a determination that the Information was not available from public sources. Developing the Information required a large expenditure of dollars and EPRI employees' time. The money spent, plus the value of EPRI's staff time in preparing the Information, shows that the Information is highly valuable to EPRI. Finally, the Information was developed only after a long period of effort of at least several months.

(5) A public disclosure of the Information would be highly likely to cause substantial harm to EPRI's competitive position and the ability of EPRI to license the Information both domestically and internationally. The Information can only be acquired and/or duplicated by others using an equivalent investment of time and effort.

I have read the foregoing, and the matters stated therein are true and correct to the best of my knowledge, information and belief. I make this affidavit under penalty of perjury under the laws of the United States of America and under the laws of the State of California.

Executed at 3412 Hillview Avenue, Palo Alto, California being the premises and place of business of the Electric Power Research Institute, Inc.

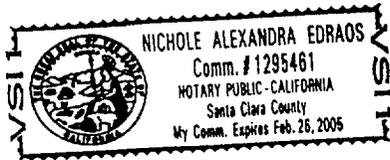


Kevin Chu

Subscribed and sworn before me this day: August 28, 2001



Nichole Alexandra Edraos, Notary Public



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EPRI

Steam Generator Tubing Outside Diameter
Stress Corrosion Cracking at Tube Support
Plates Data base for Alternate Repair
Limits, Update 2001



Technical Report

CITATIONS

This report was prepared by

Westinghouse Electric Company, LLC
Nuclear Services Division
P.O. Box 158
Madison, PA 15663-0158

Principal Investigators

T. Pitterle
R. Keating
V. Srinivas

This report describes research sponsored by EPRI.

The report is a corporate document that should be cited in the literature in the following manner:

Steam Generator Tubing Outside Diameter Stress Corrosion Cracking at Tube Support Plates Database for Alternate Repair Limits, Update 2001, EPRI, Palo Alto, CA: 2001. 1006255.

REPORT SUMMARY

This report updates and extends the database on outside diameter stress corrosion cracking at tube support plates previously reported in addendum 3 of EPRI report NP-7480-L. It covers new data on 3/4 inch and 7/8-inch tubing and updates correlations for burst pressure and probability of leak.

Background

The database required to support alternate repair limits for outside diameter stress corrosion cracking (ODSCC) of steam generator tubes at support plate intersections was originally developed from pulled tube examination results and tests of specimens produced in model boilers. Leak rate and burst pressure correlations with bobbin coil voltage were developed from overall data. Database extensions and correlations were reported in Addenda 1, 2, and 3 of EPRI report NP-7480-L as additional tube pull data became available.

Objectives

To extend the ODSCC database previously reported in Addendum 3 with pulled tube data from one plant for 3/4-inch tubing and from a second plant with 7/8 inch tubing; to update correlations for burst pressure and probability of leak.

Approach

Researchers evaluated pulled tube data from one plant with 3/4 inch tubes and one plant with 7/8 tubes against EPRI data exclusion criteria and added those data not excluded to the ODSCC database. Using the modified database, they updated correlations for burst pressure, probability of leakage, and steam-line break leak rate. They evaluated model boiler, Belgian, and French datasets against the domestic pulled tube data to develop a data exclusion criterion for evaluating these datasets against the domestic pulled tube data relative to the potential for leakage at high voltages.

Results

Researchers performed tests on pulled tube specimens and obtained burst pressure and leakage rate data. They evaluated the data against the EPRI exclusion criteria to select data that can be included for updating the database. Using the results from 7 additional inspection evaluations, they also updated the pulled tube database for field no destruction detected (NDD) indications and voltage-dependent probability of prior cycle detection (POPCD)

They developed a new data exclusion criterion to compare other data sets against domestic pulled tube data. Based upon the criterion, the French data could be excluded from the alternate plugging criteria (ARC) correlations because the data show a much lower potential for leakage at high voltages (above 5 volts) than the domestic pulled tube data. ARC correlations with and

without the French data are given in the report. Also included in the report is a documentation of the industry recommended program for tube pulls in support of the voltage-based ARC as approved by the NRC.

EPRI Perspective

Degradation of tubes at support plate intersections is one of the dominant degradation mechanisms in PWR steam generators. Alternate repair criteria were developed based upon eddy current data to replace the more restrictive criteria based on percent through-wall penetration of the degradation (EPRI TR-100407). The ODSCC database developed to support the alternate repair criteria is updated as more pulled tube data became available from the utilities using the alternate criteria. The current report describes database update #4 and revised correlations based on the recent pulled tube data.

Keywords

Stress corrosion cracking

PWRs

Steam generator tubes

Target:

Nuclear Power

About EPRI

EPRI creates science and technology solutions for the global energy and energy services industry. U.S. electric utilities established the Electric Power Research Institute in 1973 as a nonprofit research consortium for the benefit of utility members, their customers, and society. Now known simply as EPRI, the company provides a wide range of innovative products and services to more than 1000 energy-related organizations in 40 countries. EPRI's multidisciplinary team of scientists and engineers draws on a worldwide network of technical and business expertise to help solve today's toughest energy and environmental problems.

EPRI. Electrify the World

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