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Vogtle Electric Generating Plant Units I and 2 Non-proprietary version of WCAP-16142-NP, Rev. I

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Westinghouse Non-Proprietary Class 3

WCAP-16142-NP Revision 1

February 2004

Reactor Vessel Closure Head/Vessel Flange Requirements Evaluation for Vogtle Units **1** and 2

WESTINGHOUSE NON-PROPRIETARY CLASS 3

WCAP-16142-NP Revision 1

Reactor Vessel Closure Head/Vessel Flange Requirements Evaluation for Vogtle Units 1 and 2

Warren Bamford K. Robert Hsu Joseph F. Petsche

February 2004

Reviewer:

C. Y. Yang Piping Analysis and Fracture Mechanics

Approved:.

S. A. Swamy, Manager Piping Analysis and Fracture Mechanics

Westinghouse Electric Company LLC P.O. Box 355 Pittsburgh, PA 15230-0355

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1 INTRODUCTION

10 **CFR** Part 50, Appendix G contains requirements for pressure-temperature limits for the primary system, and requirements for the metal temperature of the closure head flange and vessel flange regions. The pressure-temperature limits are to be determined using the methodology of ASME Section XI, Appendix G [1], but the flange temperature requirements are specified in IOCFR5O Appendix G This rule states that the metal temperature at the closure flange regions must exceed the material unirradiated RT_{NDT} by at least 120 \textdegree F for normal operation when the pressure exceeds 20 percent of the pre-service hydrostatic test pressure, which is 621 psig for a typical PWR, and 300 psig for a typical BWR.

This requirement was originally based on concerns about the fracture margin in the closure flange region. During the boltup process, outside surface stresses in this region typically reach over 70 percent of the steady state stress, without being at steady state temperature. The margin of 120°F and the pressure limitation of 20 percent of hydrotest pressure were developed using the K_{la} fracture toughness, in the mid 1970s, to ensure that appropriate margins would be maintained.

Improved knowledge of fracture toughness and other issues which affect the integrity of the reactor vessel have led to the recent change to allow the use of K_{1c} in the development of pressure-temperature curves. as contained in ASME Code Case N-640, "Alternative Reference Fracture Toughness for Development **of** P-T Limit Curves for Section XI, Division 1." ASME Code Case N-640 was approved for use without conditions by the NRC in Regulatory Guide 1.147 [16].

Figure 1-1 illustrates the problem created by the flange requirements for a typical PWR heatup curve. ft is easy to see that the heatup curve using K_{1c} provides for a much higher allowable pressure through the entire range of temperatures. For this plant, however, the benefit is negated at temperatures below RT_{NH} +120'F because of the flange requirement of 10 CFR Part 50, Appendix G The flange requirement ol 10 CFR 50 was originally developed using the K_{1a} fracture toughness, and this report will show that use of the newly accepted K_{1c} fracture toughness for flange considerations leads to the conclusion that the flange requirement can be eliminated for Vogtle Units I and 2.

Revision 1. Created to correct errata in the report. No technical changes were made.

Figure 1-1 Illustration of the Impact of the Flange Requirement for a Typical PWR Plant

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2 TECHNICAL APPROACH

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The evaluation presented here is intended to cover the Vogtle Units 1 and 2 reactor vessels. Fracture evaluations have been performed on the closure head geometry specific to these units, and results will be tabulated and discussed. The geometry of the closure head region for Vogtle Units I and 2 is shown in Figure 2-1.

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Stress analyses have been performed, and these stress results were used to perform fracture mechanics evaluations. Details of the finite element stress analysis results are provided in Appendix C. The highest stress location in the closure head and vessel flange region is in the head, just above the bolting flange. This corresponds with the location of two welds as shown in Figure 2-1. The highest stressed location is near the outside surface of the head in that region, and so the fracture evaluations have assumed a flaw at the outside surface.

The goal of the evaluation is to compare the structural integrity of the closure head during the boltup, plant heatup and plant cooldown processes, to the structural integrity during steady state operation. The question to be addressed is: With the higher K_k^{\dagger} fracture toughness now known to be applicable, is there still a concern about the structural integrity of the closure head during boltup?

UPPER HEAD REGION

NOTE: ALL DIMENSIONS ARE IN INCHES

Figure 2-1 Geometry of the Upper Head/Flange Region of the Vogtle Units 1 and 2 Reactor Vessels

3 FRACTURE ANALYSIS METHODS AND MATERIAL PROPERTIES

The fracture evaluation was carried out using the approach suggested by Section XI Appendix G [1]. A semi-elliptic surface flaw was postulated to exist in the highest stressed region, which is at the outside surface of the closure flange. The flaw depth was assumed to encompass a range of depths into the wall thickness, and the shape was set at a length six times the depth.

3.1 STRESS INTENSITY FACTOR CALCULATIONS

One of the key elements of a fracture evaluation is the determination of the driving force or stress intensity factor (K_1) . In most cases, the stress intensity factor for the structural integrity calculations utilized a representation of the actual stress profile rather than a linearization. The stress profile was represented by a cubic polynomial:

$$
\sigma(x) = A_0 + A_1 x + A_2 x^2 + A_3 x^3 \tag{3-1}
$$

where:

 $x =$ the coordinate distance into the wall, in. σ = stress perpendicular to the plane of the crack, ksi A_i = coefficients of the cubic fit

For the surface flaw with length six times its depth, the stress intensity factor expression of Raju and Newman (Ref. 2) was used. The stress intensity factor K_1 can be calculated anywhere along the crack front. The point of maximum crack depth is represented by $\phi = 0$, and this location was found to also be the point of maximum K_1 for the cases considered here. The following expression is used for calculating K₁ as a function of the angular location around the crack front (ϕ). The units of K₁ are ksi $\sqrt{\text{in}}$.

$$
K_1 = \left[\frac{\pi a}{Q}\right]^{0.5} \sum_{j=0}^{3} G_j \left(a/c, a/t, t/R, \phi\right) A_j a^j
$$
 (3-2)

The boundary correction factors G_0 , G_1 , G_2 , and G_3 are obtained by the procedure outlined in reference (2). The dimension "a" is the crack depth, "c" is the crack half length, **"t"** is the wall thickness, "R" is the inside radius, and "Q" is the flaw shape factor, which can be approximated by $Q = 1 + 1.464$ (a/c)^{1.65}.

3.2 FRACTURE TOUGHNESS

Another key element in a fracture evaluation is the fracture toughness of the material. The fracture toughness has been taken directly from the reference curves of Appendix A, Section XI [I]. In the transition temperature region, these curves can be represented by the following equations:

$$
K_{1c} = 33.2 + 20.734 \exp[0.02 (T - RT_{NOT})]
$$
 (3-3)

$$
K_{1a} = 26.8 + 12.445 \exp[0.0145 (T - RTNOT)]
$$
 (3-4)

where K_{1c} and K_{1a} are in ksi \sqrt{in} .

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The upper shelf temperature regime requires utilization of a shelf toughness which is not specified in the ASME Code. A value of 200 ksi $\sqrt{\text{in}}$ has been used here. This value is consistent with general practice in such evaluations, as shown for example in reference 3, which provided the background and technical basis for the development of Appendix A of Section XI.

The final key element in the determination of the fracture toughness is the value of RT_{NDT} , which is a material parameter determined from Charpy V-notch and drop-weight tests.

The value of RT_{NDT} for the closure flange region of the Vogtle units was obtained from the reactor vessel record reports [13, 14] and the certified material test reports or determined from Charpy tests and dropweight tests [15]. The results are shown in Table 3-1. The highest value was 20°F and so this value was used for the illustrations to be discussed in Sections 4 and 5.

3.3 IRRADIATION EFFECTS

Neutron irradiation has been shown to produce embrittlement which reduces the toughness properties of reactor vessel steels. The decrease in the toughness properties can be assessed by determining the shift to higher temperatures of the reference nil-ductility transition temperature, RT_{NDT} .

The location of the closure flange region is such that the irradiation levels are very low and therefore the fracture toughness is not measurably affected. $a.e.e$

4 FLANGE INTEGRITY

The first step in evaluation of the closure head/flange region is to examine the stresses. The stresses which are affected by the boltup event are the axial, or meridional stresses, which are perpendicular to the nominal plane of the closure head to flange weld. The stresses in this region during the entire heatup and cooldown process are summarized in Appendix C.

The boltup is the key condition to review here, in comparison with the heatup and cooldown operation, since the flange requirement applies to boltup conditions. No other transients result in stresses in this region at low temperatures. One might suggest that the cooldown might be of similar concern, but the boltup is governing for a number of reasons:

- I. The heatup and cooldown transient is structured to ensure generous margins are maintained $(SF = 2)$ for a large flaw in the irradiated beltline region, not for the unirradiated flange region.
- 2. The cooldown transient has much higher temperatures in the head region than the boltup, and
- 3. The thermal stresses caused by the cooldown transient tend to counteract the boltup stresses; cooldown thermal stresses are tensile on the inside surface and compressive on the outside surface.

Table 4-1 provides a comparison of the stresses at boltup with those at the governing time step of heatup and cooldown which is end of heatup. It is easy to see that the stresses at boltup are mostly bending, with a very small membrane stress. As the vessel is pressurized, the membrane stresses increase. These results were taken from a finite element analysis of the heatup/cooldown process, and the boltup stress alone was compared with the most limiting time step of the entire heatup/cooldown transient, which includes pressure, thermal, and boltup stresses.

The relative impact of these stresses can best be addressed through a fracture evaluation. A semi-elliptic surface flaw was postulated at the outer surface of the closure head flange, and the stress intensity factor, K1, (or crack driving force) was calculated. The results are shown for cut 3 weld region in Figure 4-1. and for the cut 2 weld region in Figure 4-2. For a semi-elliptic surface flaw with depth equal to 10 percent of the wall thickness postulated in the highest stress region of the head, the following values were determined for the stress intensity factor.

Boltup: $K_1 = 24.84$ ksi \sqrt{in} (for $a/t = 0.1$) End of Heatup: $K_1 = 49.21$ ksi \sqrt{in} (for a/t = 0.1)

It will be useful to highlight the difference in the integrity for the head region using the two values of fracture toughness. The boltup temperature for a typical PWR is 60°F, so if $RT_{\text{NOT}} = 20$ °F the ASME reference toughness values are $K_{1a} = 49.0$ ksi \sqrt{in} and $K_{1c} = 79.3$ ksi \sqrt{in} . Using the K_{1a} toughness (which was the basis for the original flange requirements) it can be seen that the toughness exceeds the applied stress intensity factor for boltup for flaws of any depth in the head thickness. From Figure 4-1, the smallest margin = 1- K₁/K_{1a} = 0.39, when $a/t = 0.36$. For the heatup and cooldown transient, the coolant

temperature at the governing time steps, near the end of heatup, is 557°F. The fracture toughness is therefore 200 ksi $\sqrt{\text{in}}$, so again the margin is very large.

Using the K_{1c} toughness, which has now been adopted by Section XI [1] for P-T Curves, it can be seen that there is also a significant margin between the fracture toughness and the applied stress intensity factor, for both the boltup and the heatup cooldown transient. Another objective of the requirements in Appendix G is to assure that fracture margins are maintained to protect against service induced cracking due to environmental effects. Since the governing flaw is on the outside surface (the inside is in compression) where there are no environmental effects, there is even greater assurance of fracture margin. Therefore, it may be concluded that the integrity of the closure head/flange region is not a concern for the Vogtle units using the K_{1c} toughness. There are two possible mechanisms of degradation for this region, thermal aging and fatigue.

Effect **of Fatigue.** The calculated design fatigue usage for this region is less than 0. 1. so it may be concluded that flaws are unlikely to initiate in this region.

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* With boltup stress superimposed.

Notes: Cut 3 has the highest boltup stress. Cut 2 has the highest transient stress. 4-3

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Stress Intensity Factor vs a/t

Figure 4-1 Crack Driving Force as a Function of Flaw Size: Outside Surface Flaw in the Torus to Flange Region Weld for Vogtle Units I and 2 (stress intensity factor units are $\overline{\text{ksi}\sqrt{\text{in}}}$)

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Figure 4-2 Crack Driving Force as a Function of Flaw Size: Outside Surface Flaw in the Dome to Torus Region Weld for Vogtle Units 1 and 2 (stress intensity factor units are $ksi\sqrt{in}$)

5 ARE FLANGE REQUIREMENTS NECESSARY?

Using the K_{IC} curve can support the elimination of the flange temperature requirement. This can be illustrated by examining the stress intensity factor change for a postulated flaw as the vessel is heated and pressurized after boltup, progressing up to steady state operation.

The stresses at the region of interest are shown in Table 4-1, for the end of heatup, as well as boltup. Included here are the stress distributions through the wall, showing that the highest stress location for this region is the outer surface.

As the vessel is pressurized, the stresses in the closure flange region gradually change from mostly bending stresses to a combination of bending and membrane stresses. The stress intensity factor, or driving force, increases for a postulated flaw at the outside surface, as the vessel is pressurized.

A direct comparison between the original basis for the boltup requirement and the new K_{1C} approach is provided in Table 5-1. This table provides calculated boltup requirements for all the designs, using a safety factor of 2, and a reference flaw depth of $a/t = 0.10$, which was used by Randall as the basis for the original requirement 1II]. Before discussing the table, it will be helpful to discuss the basis for the reference flaw, in light of current technology, and using the results of the Performance Demonstration Initiative.

Basis for the Reference **Flaw** Size. Regulatory Guide 1.150 stimulated improvement in examinations of the clad to base-metal interface. The same techniques have been used for more than 10 years for reactor vessel head examinations performed from the outside surface. Capability demonstrations for the clad to base-metal interface have been conducted at the EPRI NDE Center since 1983. These demonstrations were performed initially for the belt-line region. However, similar techniques are used for both the vessel belt-line and the reactor vessel head, although the head exams are done manually.

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The flange temperature requirement. Finally, a simple illustration can be used to demonstrate clearly that no flange requirement is needed at the Vogtle units. The lower bound K_{1c} fracture toughness from the ASME Code is 33.2 ksi-sq-rt-in., which means that the toughness cannot be lower than that value. Study of Figures 4-1 and 4-2, for a postulated flaw of ten percent of the thickness, shows that the stress intensity factor does not exceed this value until a time step of about 300 minutes, or 5 hours into the heatup. By this time, the flange temperature is greater than 200'F, so there can be no possibility of fracture. All other locations within the flange have lower stresses, so this statement applies to the entire flange. This clearly shows that the flange requirement can be eliminated for Vogtle Units I and 2.

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* The calculated value of T-RT $_{\rm{NDT}}$ is negative, so zero is used for conservatism.

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Figure 5-1 Probability of Correct Rejection/Reporting (PCR) Considering Passed plus Failed Candidates, Appendix VIII Supplement 4, Detection from the Outside Surface. Reporting Criterion $A' = 0.15$ inch, TWE Represents Flaw Depth.

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Figure 5-2 Probability of Correct Rejection/Reporting (PCR) Considering Only Passed Candidates, Appendix VIII Supplement 4, Detection from the Outside Surface. Reporting Criterion $A' = 0.15$ inch, TWE Represents Flaw Depth.

6 SAFETY IMPLICATIONS OF THE FLANGE REQUIREMENT

There are important safety implications which are associated with the flange requirement, as illustrated by Figure 6-1. The safety concern is the narrow operating window at low temperatures forced by the flange requirement. The flange requirement sets a pressure limit of 621 psi for a PWR (20 percent of hydrotest pressure). Thus, no matter how good the toughness of the vessel, the P-T limit curve may be superceded by the flange requirement for temperatures below $RT_{\text{NOT}} + 120^{\circ}F$. This requirement was originally imposed to ensure the integrity of the flange region during boltup, but Section 4 has shown that this is no longer a concern.

The flange requirement can cause severe operational limitations when instrument uncertainties are added to the lower temperature range limit (621 psi), for the Low Temperature Overpressure Protection system of PWRs. The minimum pressure required to cool the seals of the main coolant pumps is 325 psi, so the operating window sometimes becomes very small, as shown schematically in Figure 6-1. If the operator allows the pressure to drop below the pump seal limit, the seals could fail, causing the equivalent of a small break LOCA, a significant safety problem. Elimination of the flange requirement will significantly widen the operating window for most PWRs.

An example will be provided to illustrate this situation for an operating PWR plant, Byron Unit 1. This is a forging-limited vessel at 12 EFPY, with a low leakage core, and low copper weld material in the core region. The vessel has excellent fracture toughness, which means that the flange notch is very prominent. as shown in the vessel heatup curve of Figure 6-2. As illustrated before in Figure 6-1. Byron has the LTOP setpoints significantly below the flange requirement of 621 psi, because of a relatively large instrument uncertainty. The setpoints of the two power operated relief valves arc staggered by about 16 psi to prevent a simultaneous activation. The two PORVs have different instrument uncertainties. and for conservatism the higher uncertainty is used. A similar situation exists for cooldown. as shown in Figure 6-3.

Elimination of the flange requirement for the case of Byron Unit I would mean that the PORV curve could become level at *604/587* psig, which are the leading/trailing sctpoints to protect the PORV downstream piping, through the temperature range of the 350'F down to boltup at 60'F. The **operatiny** window between the leading PORV and the pump seal limit rises from 121 psig (446-325) to 262 psig *(587-325).* This change will make a significant improvement in plant safety by reducing the prohabilit of a small LOCA, and easing the burden on the operators.

This is only one example of the impact of the flange requirement. Every operating PWR plant will have a different situation, but the operational safety level will certainly be generally improved by the elimination of this unnecessary requirement. The flange impact for Vogtle Unit 1, for example, is shown in Figures 64 and 6-5 [12].

Figure 6-1 Illustration of the Flange Requirement and its Effect on the Operating Window for a Typical Heatup Curve

Figure 6-2 Illustration of the Actual Operating Window for Heatup of Byron Unit 1, a Low Copper Plant at 12 EFPY

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Figure **6-3** Illustration of the Actual Operating Window for Cooldown of Byron Unit 1, a Low Copper Plant at 12 EFPY

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Figure 6-4 Illustration of the Flange Notch for Vogtic Unit 1, Heatup Curve

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Figure *6-5* Illustration of the Flange Notch for Vogtle Unit 1, Cooldown Curves

6-6

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APPENDIX A REACTOR PRESSURE VESSEL INSPECTION RELIABILITY*

F. L. Becker

EPRI

Charlotte NC

1 ABSTRACT

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*Presented at the Joint EC-IAEATechnical Meeting on Improvements in Inservice Inspection Effectiveness. Pettan, The Netherlands, November 2002, lo be published.

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3 DETECTION

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3.1 OUTSIDE SURFACE DEMONSTRATION

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Figure 1 Probability of Detection Performance for Passed and Passed Plus Failed Candidates forAppendix VIII Supplement 4, from the Outside Surface as a function of the flaw through wall extent (TWE). Both automated and manual techniques are included.

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Figure 2 POD for Inside Surface Examinations, Pass and Pass + Failed Candidates, Passed and Pass Plus Failed Candidates are included.

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3.2 COMBINED ID AND OD DETECTION

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Figure 3 Probability of Detection for Automated RPV Examinations Considering Both Inside and Outside Access. Passed and Passed Plus Failed Candidates are shown.

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Figure 5 Histogram of Depth Successful Sizing Candidate Test Scores, Appendix VIII, Supplement 4. Examinations Were Performed Both From the Inside and Outside Surfaces.

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Figure 7 Plan View of Sizing Error Surface Model

Figure 6 Sizing Error Surface Model
5 ACCEPTABILITY EVALUATION

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Figure 8 Probability of Correct Sizing for Passed Candidates, Appendix VIII Supplement 4 Reporting Threshold $A' = 0.15$ inch.

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6 SUMMARY

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APPENDIX B THERMAL AGING OF FERRITIC RPV STEELS AT REACTOR OPERATING TEMPERATURES

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APPENDIX C STRESS DISTRIBUTIONS IN THE CLOSURE HEAD REGION

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APPENDIX D FLANGE INSPECTION RESULTS: VOGTLE UNITS

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D-1

D-1 Introduction

The information below provides information about the Vogtle RPV head flange region inservice inspections (when the inspections were conducted, the extent of coverage achieved, inspection methods used, etc.). This information supports the discussion in the body of this report regarding the quality of inspections cited to support the assumed reference flaw size (page 5-1). More specifically, this evaluation demonstrates how the inspections conducted at Vogtle, Units I and 2, support the assumption of a 0.IT flaw size in the flange evaluation.

D-2 Inspection History

The Vogtle Unit I and 2 Closure Head to Flange welds (nominal 8.25-inch thick) were examined during the second ten-year interval to the 1989 Edition of ASME Section XI. The vessel flange examination history is shown in Table D-l. Examinations have also been performed during PSI and the first ten-year interval to earlier editions of ASME Section XI. Magnetic particle and ultrasonic examination of the examination volume (Figure IWB-2500-5) was performed as follows:

Mapnetic Particle and Ultrasonic Examinations

Unit l:

- 100% of the weld length was examined during the IR7 outage (Fall 1997).
- This outage was in the first ISI period of the second ten-year ISI interval.
- * Both the magnetic particle and **the** ultrasonic examinations had no recordable indications.

Unit 2:

- \bullet 100% of the weld length was examined during the 2R7 outage (Fall 1999).
- This outage was in the first ISI period of the second ten-year ISI interval.
- Both the magnetic particle and the ultrasonic examinations had no recordable indications.

SNC submitted a relief request (RR-4) to the NRC for limited ultrasonic examination coverage for both Vogtle I and 2. This relief request was submitted as part of the second ten-year ISI Program. This relief request was approved by a safety evaluation report (SER) to SNC in an NRC letter dated December 31, 1998.

D-3 **Magnetic Particle Examination Techniques**

In order to detect flaws open to the outer diameter (OD) surface, a magnetic particle examination of the weld and adjacent areas as required in Figure IWB-2500-5 was performed prior to each ultrasonic examination using SNC procedure MIT-V-505. This examination procedure was written in accordance with Article 7 of the ASME Boiler and Pressure Vessel Code Section V. The acceptance standards and extent of coverage was in accordance with Section XI of the ASME Boiler and Vessel Code examination category B-A. One hundred percent of the required examination surface per figure IWB-2500-5 was achieved and no indications recorded.

D-2

D4 Ultrasonic Examination Techniques

In addition to the magnetic particle examination, an ultrasonic examination was performed in accordance with SNC procedure UT-V-411. This procedure was written to comply with ASME Section XI, Appendix 1, Article 4 of ASME Section V, 1989 Edition and NRC Regulatory Guide 1.150. The ultrasonic acceptance standards were in accordance with Section XI requirements.

The ultrasonic examination system was calibrated on basic calibration block 402A. In order to record and evaluate flaws throughout the volume of the weld, a distance amplitude correction curve (DAC) was generated from side drilled holes and a 2% ID notch (approx. 0.105-inch deep, excluding clad) into the base material, which is used for far surface resolution.

Scanning of the component is performed at a minimum of 6 dB over the reference gain at which the DAC is established. The increase in scanning sensitivity further increases the probability of detection. The 1989 Edition of ASME Section XI, Appendix I requires that reflectors that produce a response greater than 20% DAC be investigated. In addition, the examiner is required to determine whether the indication originates from a flaw or is a geometric indication.

During these examinations at both Vogtle units, the ultrasonic examination had limitations due to the flange configuration and lifting lug obstructions. The combined coverage was calculated to be approximately 68%.

D-5 Summary

The magnetic particle surface examination will detect flaws open to the surface.

The ultrasonic examinations will detect flaws throughout the volume. The ultrasonic examinations are conducted with scanning sensitivities (at least 2X or +6 dB) over calibration.

The recording requirements for ultrasonic examination are extremely low (20% DAC).

The ultrasonic examinations were calibrated on a 2% notch from calibration block 402A into the ferritic base material. It is expected that an ultrasonic response from the 2% notch would be extremely sensitive when compared to a $0.1T(10%)$, flaw, which is of concern.

A high percentage of coverage (approximately 90%) from the head side was obtained with the ultrasonic examination.

A high percentage of coverage (100%) was obtained with the magnetic particle examination.

There were no indications recorded with either the magnetic or ultrasonic examinations for either the Unit I or Unit 2 head to flange weld.

D-6 Conclusion

The probability of detection for flaws on the high stress region of the outer surface of the closure head is very high due to the magnetic particle examination being performed with no limitations.

Based on the ability of the ultrasonic system to detect ID surface reflectors (2% ID notch), there is very high probability that flaws 0.1 T (10%) will be detected for the accessible volumes. Although the ID surface was not fully examined in those areas where the RPV lifting lugs are located, a significant amount of the outer 25% of the examination area was scanned in all four directions by ultrasonic examination and therefore, significant through-wall indications would have been recorded.

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Revision

February 2004
Revision 1

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Vogtle Electric Generating Plant Units I and 2 TS, Bases, and PTLR Amendment

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Vogtle Electric Generating Plant Request to Revise Technical Specifications and Pressure and Temperature Limits Report

TS. Bases, and PTLR Amendment

Proposed Changes

The proposed changes to the Technical Specifications (TS) are as follows:

- Section 5.6.6, Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR), will be revised to reference to the NRC-approved methodology for developing P/T limits and COPS setpoints (WCAP-14040-A, Rev. 4) and the methodology used to justify eliminating the reactor vessel closure head/vessel flange requirements (WCAP-16142-P, Revision 1).
- * Section 3.4.12, Cold Overpressure Protection Systems (COPS), will be revised to change the RCS vent size in LCO 3.4.12b from 2.14 square inches to 1.5 square inches.

The proposed changes to the VEGP Unit 1 and Unit 2 PTLRs are consistent with the revised P/T limits and COPS setpoints, and the information used to develop the revised P/T limits and COPS setpoints. Tables 1 and 2 below provide a cross-reference of the current PTLR Figure and Table number to the revised PTLR Figure and Table number, where applicable.

Table 1- Changes to VEGP Unit I PTLR

Vogtle Electric Generating Plant Request to Revise Technical Specifications and Pressure and Temperature Limits Report

TS, Bases, and PTLR Amendment

Table 2- Changes to VEGP Unit 2 PTLR

Basis for Proposed Changes

One of the proposed changes to the TS involves revising Section 3.4.12, Cold Overpressure Protection Systems (COPS), to change the RCS vent size in LCO 3.4.12 b. The RCS vent size was calculated based on the revised Appendix G limits developed utilizing ASME Code Case N-640 and without the reactor vessel flange temperature requirement. The revised RCS vent size is capable of mitigating the limiting cold overpressure transient. The other proposed changes to the TS involve revising the references in Section 5.6.6 to reflect the NRC-approved methodology for developing P/T limits and COPS setpoints (WCAP-14040-A, Rev. 4) and the methodology used to justify eliminating the reactor vessel closure head/vessel flange requirements (WCAP-16142-P, Revision 1). The PTLR currently contains the pressure and temperature (PAID) limits, including heatup and cooldown rates, and the nominal power operated relief valve (PORV) setpoints for cold overpressure protection. The concept of the PTLR is that the limits contained in it, which are also plant-specific and vary with vessel fluence, can be revised without prior NRC approval provided that they are calculated using an NRC-approved methodology. The revised VEGP Unit I and 2 PTLRs are consistent with NRC Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits." The surveillance capsule withdrawal schedule is contained in UFSAR Table 5.3.1-8 for Unit I and UFSAR Table 5.3.1-9 for Unit 2. The methodology for determining the limits specified in the PTLR is discussed in Enclosure 1.

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Vogtle Electric Generating Plant Units I and 2 Significant Hazards Consideration Evaluation

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Vogtle Electric Generating Plant Request to Revise Technical Specifications and Pressure and Temperature Limits Report

Significant Hazard Consideration Evaluation

Proposed Changes

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Southern Nuclear Operating Company (SNC) proposes to revise the Vogtle Electric Generating Plant (VEGP) Unit 1 and Unit 2 Technical Specifications (TS). The proposed changes would revise Section 3.4.12 to change the RCS vent size in LCO 3.4.12 b and would revise Section 5.6.6 to incorporate references to WCAP-14040-A, Rev. 4 and WCAP-16142-P, Revision 1. The revised VEGP Unit I and 2 PTLRs are consistent with NRC Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits." The following is a detailed description of the proposed changes.

Section 3.4.12, Cold Overpressure Protection Systems (COPS), will be revised to change the RCS vent size in LCO 3.4.12 b from 2.14 square inches to 1.5 square inches.

Section 5.6.6, Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR), will be revised to reference to the NRC-approved methodology for developing P/T limits and COPS setpoints (WCAP-14040-A, Rev. \bar{A}) and the methodology used to justify eliminating the reactor vessel closure head/vessel flange requirements (WCAP-16 142-P, Revision 1).

Evaluation

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

No. The proposed changes to the Technical Specifications and PTLRs do not affect any plant equipment, test methods, or plant operation, and are not initiators of any analyzed accident sequence. Operation in accordance with the proposed TS will ensure that all analyzed accidents will continue to be mitigated by the SSCs as previously analyzed. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

No. The proposed changes do not introduce any new equipment, create new failure modes for existing equipment, or create any new limiting single failures. The changes to the P-T limits and COPS setpoints will ensure that appropriate fracture toughness margins are maintained to protect against reactor vessel failure during both normal and low temperature operation. The changes to the P-T limits and COPS setpoints are consistent with the methodology approved by the NRC in WCAP-14040, Rev. 4. Plant operation will not be altered, and all safety functions will continue to perform as previously assumed in accident analyses. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

No. The proposed changes will not adversely affect the operation of plant equipment or the function of any equipment assumed in the accident analysis. The utilization of ASME Code Case N-640 maintains the relative margin of safety commensurate with that which existed at the time that ASME B&PV Code, Section XI, Appendix G was approved in 1974 and will ensure an acceptable margin of safety. Therefore, the proposed changes do no involve a significant reduction in any margin of safety.

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Vogtle Electric Generating Plant Units I and 2 Pen and Ink Changes

Technical Specification Changes

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3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.12 Cold Overpressure Protection Systems (COPS)

- LCO 3.4.12 A COPS shall be OPERABLE with all safety injection pumps incapable of injecting into the RCS and the accumulators isolated and either a or b below.
	- a. Two RCS relief valves, as follows:
		- 1. Two power operated relief valves (PORVs) with lift settings within the limits specified in the PTLR, or
		- 2. Two residual heat removal (RHR) suction relief valves with setpoints. \geq 440 psig and \leq 460 psig, or
		- 3. One PORV with a lift setting within the limits specified in the PTLR and one RHR suction relief valve with a setpoint within specified limits.
	- b. The RCS depressurized and an RCS vent of \geq \ge on an equivalent length of 10 feet of pipe).
- MODE 4, APPLICABILITY:

MODE 5,

MODE 6 when the reactor vessel head is on.

-NOTE-

- 1. Accumulator isolation is only required when accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed by the P/T limit curves provided in the PTLR.
- 2. The safety injection pumps are not required to be incapable of injecting into the RCS until 4 hours after entering MODE 4 from MODE 3 provided the temperature of one or more RCS cold legs has not decreased below 325 °F.

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Vogtle Units 1 and 2 3.4.12-1 Amendment No. 96 (Unit1) Amendment No. 74 (Unit 2)

5.6 Reporting Requirements

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5.6.5 Core Operating Limits Report (COLR) (continued)

d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 Reactor Coolant-System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

a. RCS pressure and temperature limits torheatup, cooldown, operation, criticality, and hydrostatic testing as well as heatup and coutdown rates shall be established and documented in the PTLR for the following:

LCO 3.4.3 "RCS Pressure and Temperature (P/T) Limits"

b. The power operated relief valve lift settings required to support the Cold Overpressure Protection Systems (COPS) shall be established and documented in the PTLR for the following:

LCO 3.4.12 "Cold Overpressure Protection Systems"

The RCS pressure and temperature limits for Upit 1 shall be those previously reviewed and approved by the NRC in Amendment No., 87 to Facility Operating License NPF-68. The RCS pressure and temperature limits for Unit 2 shall be those previously reviewed and approved by the NRC in Amendment No. 65 to Facility Operating License NPF-81. The acceptability of the P/T and COPS limits are documented in NRC letter "Vogtle Electric Generating Plant, Units 1 and 2 - Acceptance for Referencing of Pressure Temperature Limits Report," February 12, 1996. Specifically, the limits and methodology are described in the following documents:

- 1. Amendment No. 87 to Facility Operating License No. NPF-68, Vogtle Electric Generating Plant, Unit 1, June 8, 1995.
- 2. Amendment No. 65 to Facility Operating License No. NPF-81, **Vogtle Electric Generating Plant, Unit 2, June 8, 1995.**

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Vogtle Units 1 and 2 5.6-4 **Amendment No. 96 (Unit 1)** Amendment No. 74 (Unit 2)

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'The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

- 1. WCAP-14040-A, Rev. 4, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves."
- 2. WCAP-16142-P $\sqrt{\frac{R_c v_1}{L}}$ Closure Head/Vessel Flange Requirements Evaluation for Vogtle Units I and 2."

5.6-Reporting Requirements

Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS 5.6.6 REPORT (PTLR) (continued)

> Letter from C. I. Grimes, NRC to R. A. Newton, Westinghouse Electric Corporation, "Acceptance for Referencing of Topical Report WCAP-14040, Revision 1, 'Methodology Used to Develop Cold Overpressure Mitigating System Setpernts and RCS Heatup and Cooldown Limit Curves, October 16, 1995.

Letter from C. K. McCoy, Georgia Power Company, to U.S. Nuclear Regulatory Commission, Attention: Document Control Desk, "Vogtle Electric Generating Plant, Pressure and Temperature Limits Report," Enclosures 1 and 2, January 26, 1996.

d. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

EDG Failure Report 5.6.7

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.4, or existing Regulatory Guide 1.108 reporting requirement.

5.6.8 **PAM Report**

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When a Report is required by Condition G or K of LCO 3.3.3, "Post Accident" Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

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Vogtle Units 1 and 2

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Amendment No. 117 (Unit 1) Amendment No. 95 (Unit 2)
Bases Changes

B-3.4-REACTOR-COOLANT SYSTEM (RCS)

B 3:4.3 RCS Pressure and Temperature (P/T) Limits

BASES

BACKGROUND All components of theRCS are designed to withstand effects of cyclic loads due to system pressure and temperature changes. These loads are introduced by startup (heatup) and shutdown (cooldown) operations, power transients, and reactor trips. This LCO limits the pressure and temperature changes during RCS heatup and cooldown, within the design assumptions and the stress limits for cyclic operation.

> The PTLR contains P/T limit curves for heatup, cooldown, inservice leak and hydrostatic (ISLH) testing, and data for the maximum rate of change of reactor coolant temperature.

> Each P/T limit curve defines an acceptable region for normal operation. The usual use of the curves is operational guidance during heatup or cooldown maneuvering, when pressure and temperature indications are monitored and compared to the applicable curve to determine that operation is within the allowable region.

The LCO establishes operating limits that provide a margin to brittle failure of the reactor vessel and piping of the reactor coolant pressure boundary (RCPB). The vessel is the component most subject to brittle failure, and the LCO limits apply mainly to the vessel. The limits do not apply to the pressurizer, which has different design' characteristics and operating functions.

10 CFR 50, Appendix G (Ref. 1), requires the establishment of PIT limits for specific material fracture toughness requirements of the RCPB materials. Reference I requires an adequate margin to brittle -failure during normal operation, anticipated operational occurrences, and system hydrostatic tests. It mandates the use of the American Society of Mechanical Engineers (ASME) Code, Section JH, Appendix G (Ref. 2).

The neutron embrittlement effect on the material toughness is reflected by increasing the nil ductility reference temperature (RT_{NOT}) as exposure to neutron fluence increases.

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COPS B 3.4.12

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Vogtle Units 1 and 2 B 3.4.12-5 Revision **No. 0**

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analyses that model the performance of the COPS, assuming

SAFETY ANALYSES

APPLICABLE PORV Performance (continued)

the mass injection transient of two centrifugal charging pumps and the positive displacement pump injecting into the RCS, and the heat injection transient of starting an RCP with the RCS 50°F colder than the secondary coolant. These analyses consider pressure overshoot and undershoot beyond the PORV opening and closing, resulting from signal processing and valve stroke times. The PORV setpoints at or below the derived limit ensures the Reference 1 P/T limits will be met.

--NOTE--Although the positive displacement pump (PDP) was replaced with the normal charging pump (NCP), the current mass injection transient analysis assumes two centrifugal charging pumps and the positive displacement pump. Westinghouse performed an evaluation of the effect of replacing the PDP with the NCP and obtained acceptable results without reanalysis of the mass injection transient. Reference Westinghouse letter, GP-16838 from J. L. Tain to J. B. Beasley, Jr.,
dated August 13, 1908, GODA FODM Catalical Street dated August 13, 1998, COPS PORV Setpoint for New Charging Pump. $--$

> The PORV setpoints in the PTLR will be updated when the revised P/T limits conflict with the COPS analysis limits. The P/T limits are periodically modified as the reactor vessel material toughness decreases due to neutron embrittlement caused by neutron irradiation. Revised limits are determined using neutron fluence projections and the results of examinations of the reactor vessel material irradiation surveillance specimens. The Bases for LCO 3.4.3, 'RCS Pressure and Temperature (PIT) Limits," discuss these examinations.

The PORVs are considered active components. Thus, the failure of - -one PORV-is assumed to represent the worst case, single active failure.

RHR Suction Relief Valve Performance

The RHR suction relief valves do not have variable pressure and temperature lift setpoints like the PORVs. Analyses show that one RHR suction relief valve with a setpoint at or between 440 psig and 460 psig (Ref. 9) will pass flow greater than that required for the limiting COPS transient while maintaining RCS pressure less than the P/T limit curve.

SAFETY ANALYSES

APPLICABLE RHR Suction Relief Valve Performance (continued)

As the RCS P/T limits are decreased to reflect the loss of toughness in the reactor vessel materials due to neutron embrittlement, the RHR suction relief valves must be analyzed to still accommodate the design basis transients for COPS.

The RHR suction relief valves.are considered active components. Thus, the failure of one valve is assumed to represent the worst case single active failure.

RCS Vent Performance

With the RCS depressurized, analyses show a vent size of 2:24 square inches (based on an equivalent length of 10 feet of pipe; i.e., a vent capable of relieving 670 gpm waterflow at 470 (95) is capable of mitigating the allowed COPS overpressure transient. The **Q5/** capacity of a vent this size is greater than the flow of the limiting transient for the COPS configuration, with both safety injection pumps incapable of injecting into the RCS, maintaining RCS pressure less than the maximum pressure on the P/T limit curve.

The RCS vent size will be re-evaluated for compliance each time the P/T limit curves are revised based on the results of the vessel material surveillance.

The RCS vent is passive and is not subject to active failure.

The COPS satisfies Criterion 2 of 10 CFR 50.36 (c)(2)(ii).

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LCO This LCO requires that the COPS is OPERABLE. The COPS is OPERABLE when the minimum coolant input and pressure relief capabilities are OPERABLE. Violation of this LCO could lead to the loss of low temperature overpressure mitigation and violation of the Reference 1 limits as a result of an operational transient.

> To limit the coolant input capability, the LCO requires both safety injection pumps to be incapable of injecting into the RCS and all accumulator discharge isolation valves closed and immobilized when accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed in the PTLR.

COPS B 3.4.12

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Vogtle Units 1 and 2 B 3.4.12-8 Rev. 1-1/00

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ACTIONS E.1

The consequences of operational events that will overpressurize the RCS are more severe at lower temperature (Ref. 7). Thus, with one of the two RCS relief valves inoperable in MODE 5 or in MODE 6 with the head on, the Completion Time to restore two valves to OPERABLE status is 24 hours.

The Completion Time represents a reasonable lime to investigate and repair several types of relief valve failures without exposure to a lengthy period with only one OPERABLE RCS relief valve to protect against overpressure events.

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The RCS must be depressurized and a vent must be established within 12 hours when:

- a. Both required RCS relief valves are inoperable; or
- b. A Required Action and associated Completion Time of Condition A, C, D, or E is not met; or
- c. The COPS is inoperable 'for any' reason other than Condition A, B, C, D, or E.

The vent must be sized \geq 14 square inches (based on an equivalent length of 10 feet of pipe) to ensure that the flow capacity is greater than that required for the worst case mass input transient reasonable during the applicable MODES. This action is needed to protect the RCPB from a low temperature overpressure event and a possible brittle failure of the reactor vessel.

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The Completion Time considers the time required to place the planTin this Condition and the relatively low probability of an overpressure event during this time period due to increased operator awareness of administrative control requirements.

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Vogtle Units 1 and 2 **B 3.4.12-11** Rev. 1-9/99

REQUIREMENTS

SURVEILLANCE SR 3.4.12.1 and SR 3.4.12.2

To minimize the potential for a low temperature overpressure event by limiting the mass input capability, both safety injection pumps are verified incapable of injecting into the RCS, and the accumulator discharge isolation valves are verified closed and locked out.

The safety injection pumps are rendered incapable of injecting into the RCS through at least two independent means such that a single failure or single action will not result in an injection into the RCS.

The Frequency of within 4 hours after initial entry into MODE 4 from MODE 3 and prior to RCS cold leg temperature decreasing below 325°F (for the safety injection pumps) and 12 hours thereafter (for the safety injection pumps and accumulators) is sufficient, considering other indications and alarms available to the operator in the control room, to verify the required status of the equipment.

SR 3.4.12.3

Each required RHR suction relief valve shall be demonstrated OPERABLE by verifying its RHR suction isolation valves are open and by testing it in accordance with the Inservice Testing Program. This Surveillance is only required to be performed if the RHR suction relief valve is being used to meet this LCO. For Train A, the RHR suction relief valve is PSV-8708A and the suction isolation valves are HV-8701A and B. For Train B, the RHR suction relief valve is PSV-8708B and the suction isolation valves are HV-8702A and B.

The RHR suction valves are verified to be opened every 12 hours. The Frequency is considered adequate in view of other administrative controls such as valve status indications available to the operator in the control room that verify the RHR suction isolation valves remain open.

The ASME Code, Section Xl (Ref. 8), test per Inservice Testing Program verifies OPERABILITY by proving proper relief valve mechanical motion and by measuring and, if required, adjusting the lift setpoint.

SR 3.4.12.4

The RCS vent of \geq 2.44 square inches (based on an equivalent length of 10 feet of pipe) is proven OPERABLE by verifying its open condition either:

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Vogtle Units 1 and 2 B 3.4.12-12 Rev. 2-9/99

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BASES. SURVEILLANCE SR 3.4.12.4 (continued) **REQUIREMENTS** a. Once every 12 hours for a valve that cannot be locked. b. Once every 31'days for a valve that is locked, sealed, or secured in position. A removed pressurizer safety valve fits this category. The passive vent arrangement must only be open to be OPERABLE. This Surveillance is required to be performed if the vent is being used to satisfy the pressure relief requirements of the LCO 3.4.12b. ,4,(SR 3.4.12.5 The PORV block valve must be verified open every 72 hours to provide the flow path for each required PORV to perform its function when actuated. The valve must be remotely verified open in the main control room. This Surveillance is performed if the PORV satisfies the LCO. The block valve is a remotely controlled, motor operated valve. The power to the valve operator is not required emoved, and the manual operator is not required locked in the inactive position. Thus, the block valve can be clsed in the event the PORV develops excessive leakage or does not close (sticks open) after relieving an overpressure situation. The 72 hour Frequency is considered adequate in view of other administrative controls available to the operator in the control room, such as valve position indication, that verify that the PORV block valve remains open. SR 3.4.12.6 Performance of a COT is required within 12 hours after decreasing RCS temperature to \leq 350°F and every 31 days on each required PORV to verify and, as necessary, adjust its lift setpoint. The COT will verify the setpoint is within the **PILB** allowed maximum limits in the PTLR. PORV actuation could depressurize the RCS and is not required. A Note has been added indicating that this SR is required to be performed 12 hours after decreasing RCS cold leg temperature to \leq 350°F. The 12 hours considers the unlikelihood of a low

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temperature overpressure event during this time.

Replace entire PTLR
Wilth Revision 2

VOGTLE ELECTRIC GENERATING PLANT - UNIT 1 PRESSURE AND TEMPERATURE LIMITS REPORT **REVISION1**

Prepared by: $\frac{\sqrt{2}}{\sqrt{2}}$
Reviewed by: $\frac{\sqrt{2}}{4}$. Barley 03-20-01

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VOGTLE ELECTRIC GENERATING PLANT - UNIT 2 **RE AND TEMP RÉ LIMITS REPORT PRESSI** REVISION 1 Prepared by: *Jemmy Paul (ash 3-19-01*
Reviewed by: <u>J. h. Barley</u> (03-20-01) Reviewed by: Q_h . β α β .

Enclosure 10

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Vogtle Electric Generating Plant Units 1 and 2 Final TS, Bases, and PTLR Changes

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3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.12 Cold Overpressure Protection Systems (COPS)

- LCO 3.4.12 A COPS shall be OPERABLE with all safety injection pumps incapable of injecting into the RCS and the accumulators isolated and either a or b below.
	- a. Two RCS relief valves, as follows:
		- 1. Two power operated relief valves (PORVs) with lift settings within the limits specified in the PTLR, or
		- 2. Two residual heat removal (RHR) suction relief valves with setpoints \geq 440 psig and \leq 460 psig, or
		- 3. One PORV with a lift setting within the limits specified in the PTLR and one RHR suction relief valve with a setpoint within specified limits.
	- b. The RCS depressurized and an RCS vent of ≥ 1.5 square inches (based on an equivalent length of 10 feet of pipe).

APPLICABILITY: MODE 4, MODE 5, MODE 6 when the reactor vessel head is on.

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- Accumulator isolation is only required when accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed by the P/T limit curves provided in the PTLR.
- 2. The safety injection pumps are not required to be incapable of injecting into the RCS until 4 hours after entering MODE 4 from MODE 3 provided the temperature of one or more RCS cold legs has not decreased below 3250F.

Vogtle Units 1 and 2 3.4.12-1 Amendment No.

Amendment No.

(Uniti) $\overline{}$ (Unit 2)

5.6 Reporting Requirements

5.6.5 Core Operating Limits Report (COLR) (continued)

d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

a. RCS pressure and temperature limits for heatup, cooldown, operation, criticality, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

LCO 3.4.3 "RCS Pressure and Temperature (P/T) Limits"

b. The power operated relief valve lift settings required to support the Cold Overpressure Protection Systems (COPS) shall be established and documented in the PTLR for the following:

LCO 3.4.12 "Cold Overpressure Protection Systems"

- c. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
	- 1. WCAP-14040-A, Rev. 4, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves."
	- 2. WCAP-16142-P, Rev. 1, "Reactor Vessel Closure Head/Vessel Flange Requirements Evaluation for Vogtle Units 1 and 2."

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5.6 Reporting Requirements

- 5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)
	- d. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6.7 EDG Failure Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.4, or existing Regulatory Guide 1.108 reporting requirement.

PAM Report 5.6.8

When a Report is required by Condition G or K of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

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Amendment No. (Unit 2)

B 3.4 REACTOR COOLANT SYSTEM (RCS)

B 3.4.3 RCS Pressure and Temperature (P/T) Limits

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BASES (continued)

APPLICABLE SAFETY ANALYSES

Safety analyses (Ref. 4) demonstrate that the reactor vessel is adequately protected against exceeding the Reference 1 P/T limits. In MODES 1, 2, and 3, the pressurizer safety valves will prevent RCS pressure from exceeding the Reference 1 limits. In MODE 4 and below, overpressure prevention falls to two OPERABLE RCS relief valves or to a depressurized RCS and a sufficient sized RCS vent. Each of these means has a limited overpressure relief capability.

The actual temperature at which the pressure in the P/T limit curve falls below the pressurizer safety valve setpoint increases as the reactor vessel material toughness decreases due to neutron embrittlement. Each time the PTLR curves are revised, the COPS must be re-evaluated to ensure its functional requirements can still be met using the RCS relief valve method or the depressurized and vented RCS condition.

The PTLR contains the acceptance limits that define the COPS requirements. Any change to the RCS must be evaluated against the Reference 4 analyses to determine the impact of the change on the COPS acceptance limits.

Transients that are capable of overpressurizing the RCS are categorized as either mass or heat input transients as discussed below.

Mass Input Type Transients

- a. Inadvertent safety injection; or
- b. Charging/letdown flow mismatch.

Heat Input Type Transients

a.. Reactor coolant pump (RCP) startup with temperature asymmetry between the RCS and steam generators.

(continued)

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APPLICABLE The following are required during the COPS MODES to ensure that SAFETY ANALYSES mass and heat input transients do not occur, which either of the COPS (continued) overpressure protection means cannot handle:

- a. Rendering both safety injection pumps incapable of injection;
- b. Deactivating the accumulator discharge isolation valves in their closed positions; and
- c. Disallowing start of an RCP if secondary temperature is more than 500F above primary temperature in any one loop. With no reactor coolant pump running, this value is reduced to $25^{\circ}F$ at an RCS temperature of 350°F and varies linearly to 50°F at an RCS temperature of 200°F. LCO 3.4.6, "RCS Loops-MODE 4," and LCO 3.4.7, "RCS Loops - MODE 5, Loops Filled," provide this protection.

The Reference 4 analyses demonstrate that either one RCS relief valve or the depressurized RCS and RCS vent can maintain RCS pressure below limits when both centrifugal charging pumps are actuated. Thus, the LCO requires both safety injection pumps to be incapable of injecting into the RCS during the COPS MODES.

Since neither one RCS relief valve nor the RCS vent can handle the pressure transient caused by accumulator injection when RCS temperature is low, the LCO also requires accumulator isolation when accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed in the PTLR. The isolated accumulators must have their discharge valves closed and the valve power supply breakers fixed in their open positions.

PORV Performance'

The fracture mechanics analyses show that the vessel is protected when the PORVs are set to open at or below the limits shown in the PTLR. The setpoints are derived by analyses that model the performance of the COPS, assuming

Vogtle Units 1 and 2 B 3.4.12-5

SAFETY ANALYSES

APPLICABLE PORV Performance (continued)

the mass injection transient of two centrifugal charging pumps and the positive displacement pump injecting into the RCS, and the heat injection transient of starting an RCP with the RCS 50° F colder than the secondary coolant. These analyses consider pressure overshoot and undershoot beyond the PORV opening and closing, resulting from signal processing and valve stroke times. The PORV setpoints at or below the derived limit ensures the Reference 1 P/T limits will be met.

----------NOTE------Although the positive displacement pump (PDP) was replaced with the normal charging pump (NCP), the current mass injection transient analysis assumes two centrifugal charging pumps and the positive displacement pump. Westinghouse performed an evaluation of the effect of replacing the PDP with the NCP and obtained acceptable results without reanalysis of the mass injection transient. Reference Westinghouse letter, GP-16838 from J. L. Tain to J. B. Beasley, Jr., dated August 13, 1998, COPS PORV Setpoint for New Charging Pump.

The PORV setpoints in the PTLR will be updated when the revised P/T limits conflict with the COPS analysis limits. The P/T limits are periodically modified as the reactor vessel material toughness decreases due to neutron embrittlement caused by neutron irradiation. Revised limits are determined using neutron fluence projections and the results of examinations of the reactor vessel material irradiation surveillance specimens. The Bases for LCO 3.4.3, "RCS Pressure and Temperature (PIT) Limits," discuss these examinations.

The PORVs are considered active components. Thus, the failure of one PORV is assumed to represent the worst case, single active failure.

RHR Suction Relief Valve Performance

The RHR suction relief valves do not have variable pressure and temperature lift setpoints like the PORVs. Analyses show that one RHR suction relief valve with a setpoint at or between 440 psig and 460 psig (Ref. 9) will pass flow greater than that required for the limiting COPS transient while maintaining RCS pressure less than the P/T limit curve.

(continued)

Vogtle Units 1 and 2 B 3.4.12-6

SAFETY ANALYSES

APPLICABLE RHR Suction Relief Valve Performance (continued)

As the RCS P/T limits are decreased to reflect the loss of toughness in the reactor vessel materials due to neutron embrittlement, the.RHR suction relief valves must be analyzed to still accommodate the design basis transients for COPS.

The RHR suction relief valves are considered active components. Thus, the failure of one valve is assumed to represent the worst case single active failure.

RCS Vent Performance

With the RCS depressurized, analyses show a vent size of 1.5 square inches (based on an equivalent length of 10 feet of pipe, i.e., a vent capable of relieving 685 gpm waterflow at 722 psig) is capable of mitigating the allowed COPS overpressure transient. The capacity of a vent this size is greater than the flow of the limiting transient for the COPS configuration, with both safety injection pumps incapable of injecting into the RCS, maintaining RCS pressure less than the maximum pressure on the P/T limit curve.

The RCS vent size will be re-evaluated for compliance each time the P/T limit curves are revised based on the results of the vessel material surveillance.

The RCS vent is passive and is not subject to active failure.

The COPS satisfies Criterion 2 of 10 CFR 50.36 (c)(2)(ii).

LCO This LCO requires that the COPS is OPERABLE. The COPS is OPERABLE when the minimum coolant input and pressure relief capabilities are OPERABLE. Violation of this LCO could lead to the loss of low temperature overpressure mitigation and violation of the Reference 1 limits as a result of an operational transient.

> To limit the coolant input capability, the LCO requires both safety injection pumps to be incapable of injecting into the RCS and all accumulator discharge isolation valves closed and immobilized when accumulator pressure is greater than or equal to the maximum RCS pressure for the existing RCS cold leg temperature allowed in the PTLR.

(continued)

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overpressurization cannot occur.

overpressure protection that meets the Reference 1 P/T limits in'

MODES 1, 2, and 3. When the reactor vessel head is off,

ACTIONS A.1 (continued)

With one or more safety injection pumps capable of injecting into the RCS, RCS overpressurization is possible.

Rendering the safety injection pumps incapable of injecting into the RCS within 4 hours to restore restricted coolant input capability to the RCS reflects the urgency of removing the RCS from this condition.

B.1. C.1. and C.2

An unisolated accumulator requires isolation within 1 hour. This is only required when the accumulator pressure is at or more than the maximum RCS pressure for the existing temperature allowed by the P/T limit curves.

If isolation is needed and cannot be accomplished in 1 hour, Required Action C.1 and Required Action C.2 provide two options, either of which must be performed in the next 12 hours. By increasing the RCS temperature to $>350^\circ$ F, an accumulator pressure of 678 psig cannot exceed the COPS limits if the accumulators are fully injected. Depressurizing the accumulators below the COPS limit from the PTLR also gives this protection.

The Completion Times are based on operating experience that these activities can be accomplished in these time periods and that the likelihood that an event requiring COPS during this time is small.

D.1

In MODE 4, with one required RCS relief valve inoperable, the RCS relief valve must be restored to OPERABLE status within a Completion Time of 7 days. Two RCS relief valves in any combination of the PORVS and the RHR suction relief valves are required to provide low temperature overpressure mitigation while withstanding a single failure of an active component.

The Completion Time considers the facts that only one of the RCS relief valves is required to mitigate an overpressure transient and that the likelihood of an active failure of the remaining valve path during this time period is very low.

(continued)

ACTIONS E.1

The consequences of operational events that will overpressurize the RCS are more severe at lower temperature (Ref. 7). Thus, with one of the two RCS relief valves inoperable in MODE 5 or in MODE 6 with the head on, the Completion Time to restore two valves to OPERABLE status is 24 hours.

The Completion Time represents a reasonable time to investigate and repair several types of relief valve failures without exposure to a lengthy period with only one OPERABLE RCS relief valve to protect against overpressure events.

F.1

The RCS must be depressurized and a vent must be established within 12 hours when:

- a. Both required RCS relief valves are inoperable; or
- b. A Required Action and associated Completion Time of Condition A, C, D, or E is not met; or
- c. The COPS is inoperable for any reason other than Condition A, B, C, D, or E.

The vent must be sized ≥ 1.5 square inches (based on an equivalent length of 10 feet of pipe) to ensure that the flow capacity is greater than that required for the worst case mass input transient reasonable during the applicable MODES. This action is needed to protect the RCPB from a low temperature overpressure event and a possible brittle failure of the reactor vessel.

The Completion Time considers the time required to place the unit in this Condition and the relatively low probability of an overpressure event during this time period due to increased operator awareness of administrative control requirements.

REQUIREMENTS

SURVEILLANCE SR 3.4.12.1 and SR 3.4.12.2

To minimize the potential for a low temperature overpressure event by limiting the mass input capability, both safety injection pumps are verified incapable of injecting into the RCS, and the accumulator discharge isolation valves are verified closed and locked out.

The safety injection pumps are rendered incapable of injecting into the RCS through at least two independent means such that a single failure or single action will not result in an injection into the RCS.

The Frequency of within 4 hours after initial entry into MODE 4 from MODE 3 and prior to RCS cold leg temperature decreasing below 3250F (for the safety injection pumps) and 12 hours thereafter (for the safety injection pumps and accumulators) is sufficient, considering other indications and alarms available to the operator in the control room, to verify the required status of the equipment.

SR 3.4.12.3

Each required RHR suction relief valve shall be demonstrated OPERABLE by verifying its RHR suction isolation valves are open and by testing it in accordance with the Inservice Testing Program. This Surveillance is only required to be performed if the RHR suction relief valve is being used to meet this LCO. For Train A, the RHR suction relief valve is PSV-8708A and the suction isolation valves are HV-8701A and B. ForTrain B, the RHR suction relief valve is PSV-8708B and the suction isolation valves are HV-8702A and B.

The RHR suction valves are verified to be opened every 12 hours. The Frequency is considered adequate in view of other administrative controls such as valve status indications available to the operator in the control room that verify the RHR suction isolation valves remain open.

The ASME Code, Section Xl (Ref. 8), test per Inservice Testing Program verifies OPERABILITY by proving proper relief valve mechanical motion and by measuring and, if required, adjusting the lift setpoint.

SR 3.4.12.4

The RCS vent of ≥ 1.5 square inches (based on an equivalent length of 10 feet of pipe) is proven OPERABLE by verifying its open condition either:

REQUIREMENTS

SURVEILLANCE SR 3.4.12.4 (continued)

- a. Once every 12 hours for a valve that cannot be locked.
- b. Once every 31 days for a valve that is locked, sealed, or secured in position. A removed pressurizer safety valve fits this category.

The passive vent arrangement must only be open to be OPERABLE. This Surveillance is required to be performed if the vent is being used to satisfy the pressure relief requirements of the LCO 3.4.12 b.

SR 3.4.12.5

The PORV block valve must be verified open every 72 hours to provide the flow path for each required PORV to perform its function when actuated. The valve must be remotely verified open in the main control room. This Surveillance is performed if the PORV satisfies the LCO.

The block valve is a remotely controlled, motor operated valve. The power to the valve operator is not required to be removed, and the manual operator is not required to be locked in the inactive position. Thus, the block valve can be closed in the event the PORV develops excessive leakage or does not close (sticks open) after relieving an overpressure situation.

The 72 hour Frequency is considered adequate in view of other administrative controls available to the operator in the control room, such as valve position indication, that verify that the PORV block valve remains open.

SR 3.4.12.6

Performance of a COT is required within 12 hours after decreasing RCS temperature to \leq 350°F and every 31 days on each required PORV to verify and, as necessary, adjust its lift setpoint. The COT will verify the setpoint is within the allowed maximum limits in the PTLR. PORV actuation could depressurize the RCS and is not required.

A Note has been added indicating that this SR is required to be performed 12 hours after decreasing RCS cold leg temperature to \leq 350°F. The 12 hours considers the unlikelihood of a low temperature overpressure event during this time.

Southern Nuclear Company Vogtle Unit 1

Pressure Temperature Limits Report Revision 2, February 2004

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PRESSURE TEMPERATURE LIMITS REPORT

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1.0 RCS Prcssurc Temperature Limits Report (PTLR)

This PTLR for Vogtle Unit I has been prepared in accordance with the requirements of Technical Specification (TS) 5.6.6. The TS addressed in this report are listed below:

LCO 3.4.3 RCS Pressure and Temperature (P/T) Limits

LCO 3.4.12 Cold Overpressure Protection Systems (COPS)

Revisions to the PTLR shall be provided to the NRC after issuance.

2.0 RCS Pressure and Temperature (P/T) Limits

The limits for TS 3.4.3 are presented in the subsections which follow and were developed using the NRC approved methodology in WCAP-14040, Revision $4^[1]$ with exception of WCAP-16142-P, Revision $1^[2]$ (Elimination of the Flange Requirement). The operability requirements associated with COPS are specified in LCO 3.4.12 and were determined to adequately protect the RCS against brittle fracture in the event of a cold overpressure transient in accordance with the methodology specified in TS 5.6.6.

2.1 RCS P/T Limits (LCO 3.4.3)

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- 2.1.1 The minimum boltup temperature is 60° F
- 2.1.2 The RCS temperature rate-of-change limits are:
	- a. A maximum heatup rate of 100°F in any one hour period.
	- b. A maximum cooldown rate of 100°F in any one hour period.
	- c. A maximum temperature change of less than or equal to 10° F in any one hour period during inservice hydrostatic and leak testing operations above the heatup and cooldown limit curves.
- 2.1.3 The RCS P/T limits for heatup, cooldown, inservice hydrostatic and leak testing, and criticality are specified by Figures 2-1 and 2-2.

3.0 **Cold Overpressure Protection Systems (LCO 3.4.12)**

The setpoints for the pressurizer Power Operated Relief Valves (PORVs) are presented in the subsections which follow. These setpoints have been developed using the NRC-approved methodology specified in TS 5.6.6.
3.1 Pressurizer PORV Setpoints

The pressurizer PORV setpoints are specified in Figure 3-1 and Table 3-1. The limits for the COPS setpoints are contained in the 36 EFPY steady-state curves (Table 2-2), which are beltline conditions and are not compensated for pressure differences between the pressurizer transmitter and the reactor midplane/beltline or for instrument inaccuracies. The pressure difference between the pressurizer transmitter and the reactor vessel midplane/beltline with four reactor coolant pumps in operation is 74 psi.

Note: These setpoints include an allowance for the 50°F thermal transport effect for heat injection transients. A calculation has been performed to confirm that the setpoints will maintain the system pressure within the established limits when the pressure difference between the pressure transmitter and reactor midplane and maximum temperature/pressure instrument uncertainties are applied to the setpoints.

4.0 **Reactor Vessel Material Surveillance Program**

The reactor vessel material irradiation surveillance specimens shall be removed and examined to determine changes in material properties. The removal schedule is provided in UFSAR Table 5.3.1-8. The results of these examinations shall be used to update Figures 2-1, 2-2, and 3-1.

The pressure vessel steel surveillance program (WCAP-11011^[4]) is in compliance with Appendix H^[3] to 10 CFR 50, "Reactor Vessel Material Surveillance Program Requirements." The material test requirements and the acceptance standard utilize the reference nil-ductility temperature RT_{NDT} , which is determined in accordance with ASTM E23^[5]. The empirical relationship between RT_{NDT} and the fracture toughness of the reactor vessel steel is developed in accordance with Code Case N-640^[6] of Section XI of the ASME Boiler and Pressure Vessel Code, Appendix G. "Fracture Toughness Criteria for Protection Against Failure^{n_1}. The surveillance capsule removal schedule meets the requirements of ASTM E185-82^[8]. The removal schedule is provided in UFSAR Table 5.3.1-8.

5.0 Supplemental Data Tables

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Table 5-1 contains a comparison of measured surveillance material 30 ft-lb transition temperature shifts and upper shelf energy decreases with Regulatory Guide 1.99, Revision $2^{[9]}$, predictions.

Table 5-2 shows calculations of the surveillance material chemistry factors using surveillance capsule data. Note that in the calculation of the surveillance weld chemistry factor, the ratio procedure from Regulatory Guide 1.99, Revision 2 was followed. The ratio in question is equal to 1.02.

Table 5-3 provides the required Vogtle Unit I reactor vessel toughness data.

Table 54 provides a summary of the fluence values used in the generation of the heatup and cooldown limit curves and the PTS evaluation.

Table 5-5 and 5-6 show the calculation of the 1/4T and 3/4T adjusted reference temperature at 36 EFPY for each beltline material in the Vogtle Unit I reactor vessel. The limiting beltline material was the intermediate shell plate B8805-2.

Table 5-7 provides a summary of the adjusted reference temperature (ART) values of the Vogtle Unit I reactor vessel beltline materials at the I/4T and 3/4T locations for 36 EFPY.

Table 5-8 provides RT_{PTS} values for Vogtle Unit 1 at 36 EFPY.

Table 5-9 provides RT_{PTS} values for Vogtle Unit 1 at 54 EFPY

MATERIAL PROPERTY BASIS

LIMITING MATERIAL: INTERMEDIATE SHELL PLATE B8805-2 LIMITING ART VALUES AT 36 EFPY: 1/4T, 110°F 3/4T, 95°F

Figure 2-1 Vogtle Unit 1 Reactor Coolant System Heatup Limitations (Heatup Rate of 100°F/hr) Applicable for the First 36 EFPY (Without Margins for Instrumentation Errors) *(Plotted Data provided on Table 2-1)*

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Figure 2-2 Vogtle Unit 1 Reactor Coolant System Cooldown Limitations (Cooldown Rates **up** to 100°F/hr) Applicable for the First 36 EFPY (Without Margins for Instrumentation Error) *(Plotted Data provided on Table 2-2)*

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Table 2-1 Vogtle Unit I Heatup Limits at 36 EFPY (Without Uncertainties for Instrumentation Errors)

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Table 2-2

Vogtle Unit I Cooldown Limits at 36 EFPY (Without Uncertainties for Instrumentation Errors)

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Figure 3-1: Vogtlc Unit I Maximum Allowable Nominal PORN' Setpoints for COPS

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Table 5-1

Comparison of the Vogtle Unit 1 Surveillance Material 30 fl-lb Transition Temperature Shifts and Upper Shelf Energy Decreases with Regulatory Guide 1.99, Revision 2, Predictions

Notes:

(a) Based on Regulatory Guide 1.99, Revision 2, methodology using **the** mean weight percent values of copper and nickel of the surveillance material.

- (b) Calculated using measured Charpy data plotted using CVGRAPH, Version 4.1^[11].
- (c) Values are based on the definition of upper shelf energy given in ASTM E185-82^[8].

(d) The actual measured value of ΔRT_{NDT} for the intermediate shell plate (capsule U) is -9.58, the actual measured value of ΔRT_{NDT} for the weld metal (capsule V) is -1.34 and the actual measured value of ΔRT_{NDT} for the HAZ metal (capsule U) is -19.35. This physically should not occur, therefore for conservatism a value of zero will be reported (i.e. No Change in T_{30}).

(e) The heat number for lower shell plate B8805-3 is C-0623-1.

(n The Surveillance weld was fabricated from Wire Heat No. 83653, Flux Type Linde 0091, Flux Lot No. 3536.

Material	Capsule	Capsule $f^{(a)}$	$\mathbf{FF}^{(b)}$	$\Delta RT_{NDT}^{(c)}$	$FF*ART_{NDT}$	$\mathbf{F} \mathbf{F}^2$	
Intermediate Shell	$\mathbf U$	0.3691	0.725	13.6	9.9	0.526	
Plate B8805-3 ^(f)	Y	1.276	1.068	31.9	34.1	1.141	
(Longitudinal)	V	2.178	1.211	42.7	51.7	1.467	
Intermediate Shell	$\mathbf U$	0.3691	0.725	0 ^(c)	0.0	0.526	
Plate B8805-3 ^(f)	Y	1.276	1.068	15.2	16.2	1.141	
(Transverse)	\mathbf{V}	2.178	1.211	33.8	40.9	1.467	
			152.8	6.268			
	$CF_{B8805-3} = \sum (FF * RT_{NDT}) \div \sum (FF^2) = (152.8) \div (6.268) = 24.4^{\circ}F$						
Surveillance Weld	U	0.3691	0.725	$25.5(25.0)^{(d)}$	18.5	0.526	
Meta ^(g)	Y	1.276	1.068	7.9 $(7.7)^{(d)}$	8.4	1.141	
	\bf{V}	2.178	1.211	0 ^(c)	0.0	1.467	
				SUM	26.9	3.134	
	$CF_{\text{Weld}} = \sum (FF \cdot RT_{\text{NDT}}) \div \sum (FF^2) = (26.9) \div (3.134) = 8.6^{\circ}F$						

Table 5-2 Calculation of Chemistry Factors using Vogtle Unit I Surveillance Capsule Data

Notes:

(a) $f =$ Calculated fluence from capsule V dosimetry analysis results ⁽¹⁰⁾, (x 10¹⁹ n/cm², E > 1.0 MeV).

(b) FF = fluence factor = $f^{(0.28 - 0.1 \cdot \log \theta)}$.

(c) ΔRT_{NDT} values are the measured 30 ft-lb shift values taken from App. C of Ref. 10, rounded to one decimal point.

(d) The surveillance weld metal ΔRT_{NDT} values have been adjusted by a ratio factor of 1.02.

(e) Actual values for ΔRT_{NDT} are -9.58 (Plate) and -1.34 (Weld). This physically should not occur, therefore for conservatism a value of zero will be used for this calculation..

(f) The heat number for lower shell plate B8805-3 is C-0623-1.

(g) Surveillance Weld was fabricated from Wire Heat No.83653, Flux Type Linde 0091, Flux Lot No. 3536.

Notes:

(a) The initial RT_{NDT} values for the plates and welds are based on measured data.

(b) All welds, including the surveillance weld, were fabricated with weld wire heat number 83653, Linde 0091 Flux, Lot No. 3536. Per Regulatory Guide 1.99, Revision 2, "weight percent copper " and "weight percent nickel" are the best-estimate values for the material, which will normally be the mean of the measured values for a plate or forging or for weld samples made with the weld wire heat number that matches the critical vessel weld."

Peak Calculated Neutron Fluence Projections at Key Azimuthal Locations on the Reactor Vessel Clad/Base Metal Interface for Vogtle Unit 1 (10¹⁹ n/cm², E > 1.0 MeV]

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Notes:

(a) Initial RT_{NDT} values are measured values.

(b) $\Delta \text{RT}_{\text{NDT}}$ = CF * FF

(c) $M = 2 \cdot ((\sigma_i^2 + \sigma_A^2))^D$

(d) $ART = Initial RT_{NDT} + ΔRT_{NDT} + Margin (°F); (Rounded per ASTM E29, using the "Rounding Method").$

(e) Data deemed credible per Reference 10.

(f Neutron Fluence value used for all material is the highest value (@ 30°) from Table 5-4 for 36 EFPY with exception to intermediate shell longitudinal weld 101-124A and lower shell longitudinal weld 101-142B which used the fluence at 0° from Table 5-4 for 36 EFPY.

Material	RG 1.99 R2 Method	CF (°F)	FF	$\text{IRT}_{\text{NDT}}^{(a)}$	$\Delta RT_{NDT}^{(b)}$	Margin ^(c)	ART ^(d)
Intermediate Shell Plate B8805-1	Position 1.1	53.1	0.773	Ω	41.0	34	75
Intermediate Shell Plate B8805-2	Position 1.1	53.1	0.773	20	41.0	34	95
Intermediate Shell Plate B8805-3	Position 1.1	38.4	0.773	30	29.7	29.7	89
	Position 2.1	24,4	0.773	30	18.9	$17^{(c)}$	66
Lower Shell Plate B8606-1	Position 1.1	32.8	0.773	20	25.4	25.4	71
Lower Shell Plate B8606-2	Position 1.1	35.2	0.773	20	27.2	27.2	74
Lower Shell Plate B8606-3	Position 1.1	41.9	0.773	10 [°]	32.4	32.4	75
Inter. Shell Longitudinal Weld Seam 101-124A $(0^{\circ}$ Azimuth)	Position 1.1	34.5	0.622	-80	21.5	21.5	-37
	Position 2.1	8.6	0.622	-80	5.3	$5.3^{(c)}$	-69
Inter. Shell Long. Weld Seams	Position 1.1	34.5	0.773	-80	26.7	26.7	-27
101-124B,C $(120^\circ, 240^\circ Azimuth)$	Position 2.1	8.6	0.773	-80	6.6	$6.6^{(e)}$	-67
Intermediate to Lower Shell Girth Weld Seam 101-171	Position 1.1	34.5	0.773	-80	26.7	26.7	-27
	Position 2.1	8.6	0.773	-80	6.6	$6.6^{(e)}$	-67
Lower Shell Long. Weld Seams 101-142A,C (60°, 300° Azimuth)	Position 1.1	34.5	0.773	-80	26.7	26.7	-27
	Position 2.1	8.6	0.773	-80	6.6	$6.6^{(e)}$	-67
Lower Shell Long. Weld Seam	Position 1.1	34.5	0.622	-80	21.5	21.5	-37
101-142B (180° Azimuth)	Position 2.1	8.6	0.622	-80	5.3	$5.3^{(e)}$	-69

Table 5-6 Vogtle Unit 1 Calculation of the ART Values for the 3/4T Location $@$ 36 EFPY⁽⁰

Notes:

(a) Initial RT_{NDT} values are measured values.

(b) $\Delta \text{RT}_{\text{NDT}}$ = CF * FF

(c) $M = 2 \cdot (\sigma_1^2 + \sigma_2^2)^{1/2}$

(d) $ART = Initial RT_{NDT} + $\Delta RT_{NOT} + Margin$ (^oF); (Rounded per ASTM E29, using the "Rounding Method").$

(e) Data deemed credible per Reference **10.**

(f) Neutron Fluence value used for all material is the highest value ($@$ 30°) from Table 5-4 for 36 EFPY with exception to intermediate shell longitudinal weld 101-124A and lower shell longitudinal weld 101-142B which used the fluence at 0° from Table 5-4 for 36 EFPY.

Material	RG 1.99 R2 Method	% ART $(^{\circ}F)$	3/4 ART $({}^{\circ}F)$
Intermediate Shell Plate B8805-1	Position 1.1	90	75
Intermediate Shell Plate B8805-2	Position 1.1	110	95
Intermediate Shell Plate B8805-3	Position 1.1	105	89
	Position 2.1	73	66
Lower Shell Plate B8606-1	Position 1.1	89	71
Lower Shell Plate B8606-2	Position 1.1	91	74
Lower Shell Plate B8606-3	Position 1.1	88	75
Inter. Shell Longitudinal Weld	Position 1.1	-18	-37
Seam 101-124A $(0^{\circ}$ Azimuth)	Position 2.1	-65	-69
Inter. Shell Long. Weld Seams	Position 1.1	-7	-27
101-124B,C $(120^\circ, 240^\circ$ Azimuth)	Position 2.1	-62	-67
Intermediate to Lower Shell	Position 1.1	-7	-27
Girth Weld Seam 101-171	Position 2.1	-62	-67
Lower Shell Long. Weld Seams	Position 1.1	-7	-27
101-142A,C (60°, 300° Azimuth)	Position 2.1	-62	-67
Lower Shell Long. Weld Seam	Position 1.1	-18	-37
101-142B (180° Azimuth)	Position 2.1	-65	-69

Table 5-7 Summary of the Vogtle Unit I Reactor Vessel Beltline Material ART Values

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RT_{PTS} Calculations for Vogtle Unit 1 Beltline Region Materials at 36 EFPY^(f)

Notes:

(a) Initial RT_{NDT} values are measured values

(b) $\Delta \text{RT}_\text{PTS}$ = CF * FF

(c) $M = 2 \cdot (\sigma_i^2 + \sigma_A^2)^{1/2}$

(d) $RT_{PTS} = RT_{NDT(U)} + \Delta RT_{PTS} + Margin$ (°F)

(e) Data deemed credible per Reference 10.

(I) Neutron Fluence value used for all material is the highest value (@ 30°) from Table *5-4* for 36 EFPY with exception to intermediate shell longitudinal weld 101-124A and lower shell longitudinal weld 10 1-142B which used the fluence at 0° from Table 5-4 for 36 EFPY. \overline{a}

Table 5-9

RT_{PTS} Calculations for Vogtle Unit 1 Beltline Region Materials at 54 EFPY^(f)

Notes:

(a) Initial RT_{NDT} values are measured values

(b) $\Delta \mathrm{RT}_\mathrm{PTS}$ = CF * FF

(c) $M = 2 \cdot (\sigma_i^2 + \sigma_{\Delta}^2)^{1/2}$

(d) $RT_{PIS} = RT_{NDT(U)} + \Delta RT_{PTS} + Margin$ (°F)

(e) Data deemed credible per Reference 10.

(f Neutron Fluence value used for all material is the highest value (@ 300) from Table *5-4* for 36 EFPY with exception to intermediate shell longitudinal weld 101-124A and lower shell longitudinal weld 101- 142B which used the fluence at 0° from Table 5-4 for 36 EFPY.

6.0 **References**

- 1. WCAP-14040-NP-A, Revision 4, "Methodology used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves", J.D. Andrachek, et. al.
- 2. WCAP-16142-P, Revision 1, "Reactor Vessel Closure Head/Vessel Flange Requirements Evaluation for Vogtle Units I and 2", Warren Bamford, et. al., February 2004.
- 3. Code of Federal Regulations, I0CFR50, Appendix *1H, Reactor Vessel AIaterial Surveillance Program Requirements,* U.S. Nuclear Regulatory Commission, Washington, D.C.
- 4. WCAP-11011, *Georgia Power Company Alvin W. Vogtle Unit No. 2 Reactor Vessel Radiation Surveillance Program,* L. R. Singer, February 1986.
- *5.* ASTM E23 *Standard Test Alethod Notched Bar nmpact Testing of Metallic AMaterials,* in ASTM Standards, American Society for Testing and Materials, Philadelphia, PA.
- 6. ASME Code Case N-640, "Alternative Reference Fracture Toughness for Development of P-T Limit Curves for Section XI, Division 1", February 26, 1999.
- 7. Section XI of the ASME Boiler and Pressure Vessel Code, Appendix G. *Fractlure Toughness Criteriafor Protection Against Failure.*
- 8. ASTM E185-82, Annual Book of ASTM Standards, Section 12, Volume 12.02, *Standard Practice for Conducting Surveillance Testsfor Light- Water Cooled Nuclear Power Reactor 1essels.*
- 9. Regulatory Guide 1.99, Revision 2, *Radiation Embrittlement of Reactor Vessel Materials*, U.S. Nuclear Regulatory Commission, May 1988.
- 10. WCAP-15067, *Analysis of Capsule V From the Southern Nuclear Vogtle Electric Generating Plant Unit I Reactor Vessel Radiation Surveillance Program,* T.J. Laubliam, et. al., Dated September 1998. [Note that the Testing/Analysis reports for surveillance capsules U and Y from *Vogtle Unit 1 were documented under WCAP-12256 and WCAP-13931, Rev. 1, respectively.]*
- 11. CVGRAPH, Hyperbolic Tangent Curve-Fitting Program, Version 4.1, developed by ATI Consulting, March 1999.

Southern Nuclear Company Vogtle Unit 2

Pressure Temperature Limits Report Revision 2, February 2004

PRESSURE TEMPERATURE LIMITS REPORT $\ddot{}$

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List Of Tables

List **Of Figures**

1.0 RCS Pressure Temperature Limits Report (PTLR)

This PTLR for Vogtle Unit 2 has been prepared in accordance with the requirements of Technical Specification (TS) 5.6.6. The TS addressed in this report are listed below:

LCO 3.4.3 RCS Pressure and Temperature (P/T) Limits

LCO 3.4.12 Cold Overpressure Protection Systems (COPS)

Revisions to the PTLR shall be provided to the NRC after issuance.

2.0 RCS Pressure **and Temperature (P/T) Limits (LCO 3.4.3)**

The limits for TS 3.4.3 are presented in the subsections which follow and were developed using the NRC approved methodology in WCAP-14040, Revision $4^{[1]}$ with exception of WCAP-16142-P, Revision $1^{[2]}$ (elimination of the flange requirement). The operability requirements associated with the COPS are specified in LCO 3.4.12 and were determined to adequately protect the RCS against brittle fracture in the event of a cold overpressure transient in accordance with the methodology specified in TS 5.6.6.

- 2.1 RCS P/T Limits (LCO 3.4.3)
- 2.1.1 The minimum boltup temperature is 60°F
- 2.1.2 The RCS temperature rate-of-change limits are:
	- a. A maximum heatup rate of 100°F in any one hour period.
	- b. A maximum cooldown rate of 100° F in any one hour period.
	- c. A maximum temperature change of less than or equal to 10° F in any one hour period during inservice hydrostatic and leak testing operations above the heatup and cooldown limit curves.
- 2.1.3 The RCS P/T limits for heatup, cooldown, inservice hydrostatic and leak testing, and criticality are specified by Figures 2-1 and 2-2.

3.0 Cold Overpressure **Protection** Systems **(LCO 3.4.12)**

The setpoints for the pressurizer Power Operated Relief Valves (PORVs) are presented in the subsections which follow. These setpoints have been developed using the NRC-approved methodology specified in TS 5.6.6.

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3.1 Pressurizer PORV Setpoints

The pressurizer PORV setpoints are specified in Figure 3-1 and Table 3-1. The limits for the COPS setpoints are contained in the 36 EFPY steady-state curves (Table 2-2), which are beltline conditions and are not compensated for pressure differences between the pressurizer transmitter and the reactor midplane/beltline or for instrument inaccuracies. The pressure difference between the pressurizer transmitter and the reactor vessel midplane/beltline with four reactor coolant pumps in operation is 74 psi.

Note: These setpoints include an allowance for the 50°F thermal transport effect for heat injection transients. A calculation has been performed to confirm that the setpoints will maintain the system pressure within the established limits when the pressure difference between the pressure transmitter and reactor midplane and maximum temperature/pressure instrument uncertainties are applied to the setpoints.

4.0 Reactor 'Vesscl M1atcrial Surveillance Program

The reactor vessel material irradiation surveillance specimens shall be removed and examined to determine changes in material properties. The removal schedule is provided in UFSAR Table 5.3.1-9. The results of these examinations shall be used to update Figures 2-1, 2-2, and 3-1.

The pressure vessel steel surveillance program (WCAP-11381 $^[4]$) is in compliance with Appendix $H^[3]$ to</sup> 10 CFR 50, "Reactor Vessel Material Surveillance Program Requirements." The material test requirements and the acceptance standard utilize the reference nil-ductility temperature RT_{NDT} , which is determined in accordance with ASTM E23^[5]. The empirical relationship between RT_{NOT} and the fracture toughness of the reactor vessel steel is developed in accordance with Code Case N-640^[6] of Section XI of the ASME Boiler and Pressure Vessel Code, Appendix G "Fracture Toughness Criteria for Protection Against Failure"^[7]. The surveillance capsule removal schedule meets the requirements of ASTM E185-82^[8]. The removal schedule is provided in UFSAR Table 5.3.1-9.

5.0 **Supplemental** Data Tables

Table 5-1 contains a comparison of measured surveillance material 30 ft-lb transition temperature shifts and upper shelf energy decreases with Regulatory Guide 1.99, Revision $2^{[9]}$, predictions.

Table 5-2 shows calculations of the surveillance material chemistry factors using surveillance capsule data. Note that in the calculation of the surveillance weld chemistry factor, the ratio procedure from Regulatory Guide 1.99, Revision 2 was followed. The ratio in question is equal to 1. 19.

Table 5-3 provides the required Vogtle Unit 2 reactor vessel toughness data.

Table 54 provides a summary of the fluence values used in the generation of the heatup and cooldown limit curves and the PTS evaluation.

Table 5-5 and 5-6 show the calculation of the 1/4T and 3/4T adjusted reference temperature at 36 EFPY for each beltline material in the Vogtle Unit 2 reactor vessel. The limiting beltline material was the lower shell plate R8-1.

Table 5-7 provides a summary of the adjusted reference temperature (ART) values of the Vogtle Unit 2 reactor vessel beltline materials at the 1/4T and 3/4T locations for 36 EFPY.

Table 5-8 provides RT_{PTS} values for Vogtle Unit 2 at 36 EFPY.

Table 5-9 provides RT_{PTS} values for Vogtle Unit 2 at 54 EFPY

MATERIAL PROPERTY BASIS

LIMITING MATERIAL: LOWER SHELL PLATE R8-1 LIMITING ART VALUES AT 36 EFPY: 1/4T, 120°F 3/4T, 107°F

Figure 2-1 Vogtle Unit 2 Reactor Coolant System Heatup Limitations (Heatup Rate of 100°F/hr) Applicable for the First 36 EFPY (Without Margins for Instrumentation Errors) *(Plotted Data provided on Table 2-1)*

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MATERIAL PROPERTY BASIS

LIMITING MATERIAL: LOWER SHELL PLATE R8-1 LIMITING ART VALUES AT 36 EFPY: 1/4T, 120°F 3/4T, 107°F

Figure 2-2 Vogtle Unit 2 Reactor Coolant System Cooldown Limitations (Cooldown Rates up to 100°F/hr) Applicable for the First 36 EFPY (Without Margins for Instrumentation Error) *(Plotted Data provided on Table 2-2)*

Table 2-1 Vogtle Unit 2 Heatup Limits at 36 EFPY (Without Uncertainties for Instrumentation Errors)

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Table 2-2

Vogtle Unit 2 Cooldown Limits at 36 EFPY (Without Uncertainties for Instrumentation Errors)

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Figure 3-1: Vogtle Unit 2 Maximum Allowable Nominal PORV Setpoints for COPS

Table **5-1**

Comparison of the Vogtle Unit 2 Surveillance Material 30 ft-lb Transition Temperature Shifts and Upper Shelf Energy Decreases with Regulatory Guide 1.99, Revision 2, Predictions

Notes:

(a) Based on Regulatory Guide 1.99, Revision 2, methodology using the mean weight percent values of copper and nickel of the surveillance material.

- (b) Calculated using measured Charpy data plotted using CVGRAPH, Version 4.1^[11].
- (c) Values are based on the definition of upper shelf energy given in ASTM E185-82^[8].
- (d) Actual values for ΔRT_{NDT} are -7.14 (Plate), -17.49 (Weld), -24.05 (HAZ Cap. U), -9.86 (HAZ Cap. Y) and -2.1 (HAZ Cap. X). This physically should not occur, therefore for conservatism a value of zero will be reported (i.e. No Change in T_{30}).
- (e) The heat number for lower shell plate B8628-1 is C-3500-2.
- (f) The Surveillance weld was fabricated from Wire Heat No. 87005, Flux Type Linde 124, Flux Lot No. 1061.

Notes:

- (a) f = Calculated fluence from capsule X dosimetry analysis results **(10),** (x **1019** n/cm2, E > 1.0 MeV).
- (b) FF = fluence factor = $f^{(0.28-0.14)}$ og f).
- (c) ΔRT_{NDT} values are the measured 30 ft-lb shift values taken from App. B of Ref. 10, rounded to one decimal point.
- (d) The surveillance weld metal ΔRT_{NDT} values have been adjusted by a ratio factor of 1.19.
- (e) Actual values for ΔRT_{NDT} are -7.14 (Plate) and -17.49 (Weld). This physically should not occur; therefore for conservatism a value of zero will be used.
- (f) The heat number for lower shell plate B8628-1 is C-3500-2.
- (g) Surveillance Weld was fabricated from Wire Heat No. 87005, Flux Type Linde 124, Flux Lot No. 1061.

Notes:

(a) The initial RT_{NDT} values for the plates and welds are based on measured data.

(b) The weld material in the Vogtle Unit 2 surveillance program was made of the same wire and flux as the reactor vessel intermediate to lower shell girth seam weld (101-171). These welds were fabricated using weld wire heat no. 87005, Linde 124 Flux, lot no. 1061. The intermediate shell longitudinal weld seams (101-124A,B,C) and the lower shell longitudinal weld seams (101- 142A,B,C) were fabricated using weld wire heat no. 87005, Linde 0091 Flux, lot no. 0145. Hence the surveillance weld is representative of all beltline welds.

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Material	RG 1.99 R2 Method	CF (PF)	FF	IRT _{NDT} ^(a)	$\Delta RT_{NDT}^{(b)}$	Margin ^(c)	ART ^(d)
Intermediate Shell Plate R4-1	Position 1.1	44.0	1.051	10 [°]	46.2	34	90
Intermediate Shell Plate R4-2	Position 1.1	37.0	1.051	10	38.9	34	83
Intermediate Shell Plate R4-3	Position 1.1	31.0	1.051	30	32.6	32.6	95
Lower Shell Plate B8825-1	Position 1.1	37.0	1.051	40	38.9	34	113
Lower Shell Plate R8-1	Position 1.1	44.0	1.051	40	46.2	34	120
Lower Shell Plate B8628-1	Position 1.1	31.0	1.051	50	32.6	32.6	115
	Position 2.1	12.9	1.051	50	13.6	$13.6^{(e)}$	77
Intermediate Shell Longitudinal	Position 1.1	43.3	1.051	-10	45.5	45.5	81
Weld Seams 101-124A, B, C	Position 2.1	16.7	1.051	-10	17.6	$17.6^{(e)}$	25
Lower Shell Longitudinal	Position 1.1	43.3	1.051	-10	45.5	45.5	81
Weld Seams 101-142A, B, C	Position 2.1	16.7	1.051	-10	17.6	$17.6^{(c)}$	25
Intermediate to Lower Shell	Position 1.1	43.3	1.051	-30	45.5	45.5	61
Circ. Weld Seam 101-171	Position 2.1	16.7	1.051	-30	17.6	$17.6^{(e)}$	S

Table 5-5 Vogtle Unit 2 Calculation of the ART Values for the 1/4T Location $@$ 36 EFPY⁽⁰)

Notes:

(a) Initial RT_{NDT} values are measured values.

(b) ΔRT_{NDT} = CF * FF

(c) $M = 2 \cdot (\sigma_i^2 + \sigma_{\Delta}^2)^{1/2}$

(d) $ART = Initial RT_{NDT} + $\Delta RT_{NDT} + Margin (°F)$; (Rounded per ASTM E29, using the "Rounding Method")$

(e) Data deemed credible per Reference 10.

 $($ f $)$ Neutron Fluence value used for all material is the highest value from Table 5-4 for 36 EFPY.
Material	RG 1.99 R2	CF	FF	$\text{IRT}_{\text{NDT}}^{(a)}$	$\Delta RT_{NDT}^{(b)}$	Margin ^(c)	ART ^(d)
	Method	(PF)					
Intermediate Shell Plate R4-1	Position 1.1	44.0	0.763	10 [°]	33.6	33.6	77
Intermediate Shell Plate R4-2	Position 1.1	37.0	0.763	10	28.2	28.2	66
Intermediate Shell Plate R4-3	Position 1.1	31.0	0.763	30	23.7	23.7	77
Lower Shell Plate B8825-1	Position 1.1	37.0	0.763	40	28.2	28.2	96
Lower Shell Plate R8-1	Position 1.1	44.0	0.763	40	33.6	33.6	107
Lower Shell Plate B8628-1	Position 1.1	31.0	0.763	50	23.7	23.7	97
	Position 2.1	12.9	0.763	50	9.8	$9.8^{(e)}$	70
Intermediate Shell Longitudinal	Position 1.1	43.3	0.763	-10	33.0	33.0	56
Weld Seams 101-124A, B, C	Position 2.1	16.7	0.763	-10	12.7	12.7 ^(c)	15
Lower Shell Longitudinal	Position 1.1	43.3	0.763	-10	33.0	33.0	56
Weld Seams 101-142A, B, C	Position 2.1	16.7	0.763	-10	12.7	12.7 ^(c)	15
Intermediate to Lower Shell	Position 1.1	43.3	0.763	-30	33.0	33.0	36
Circ. Weld Seam 101-171	Position 2.1	16.7	0.763	-30	12.7	12.7 ^(c)	-5

Table 5-6 Vogtle Unit 2 Calculation of the ART Values for the 3/4T Location $@$ 36 EFPY⁽⁰)

Notes:

(a) Initial RT_{NDT} values are measured values.

(b) $\Delta RT_{NDT} = CF * FF$

(c) $M = 2 \cdot (\sigma_1^2 + \sigma_2^2)^{1/2}$

(d) ART = Initial $RT_{NDT} + \Delta RT_{NDT} + Margin ({}^{\circ}F)$; (Rounded per ASTM E29, using the "Rounding Method")

(e) Data deemed credible per Reference 10.

(f) Neutron Fluence value used for all material is the highest value from Table *5-4* for 32 EFPY.

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Material	RG 1.99 R2 Method	1/4 ART (°F)	3/4 ART (°F)	
Intermediate Shell Plate R4-1	Position 1.1	90	77	
Intermediate Shell Plate R4-2	Position 1.1	83	66	
Intermediate Shell Plate R4-3	Position 1.1	95	77	
Lower Shell Plate B8825-1	Position 1.1	113	96	
Lower Shell Plate R8-1	Position 1.1	120	107	
Lower Shell Plate B8628-1	Position 1.1	115	97	
	Position 2.1	77	70	
Intermediate Shell Longitudinal	Position 1.1	81	56	
Weld Seams 101-124A, B, C	Position 2.1	25	15	
Lower Shell Longitudinal	Position 1.1	81	56	
Weld Seams 101-142A, B, C	Position 2.1	25	15	
Intermediate to Lower Shell	Position 1.1	61	36	
Circ. Weld Seam 101-171	Position 2.1	5	-5	

Table 5-7 Summary of the Vogtle Unit 2 Reactor Vessel Beltline Material ART Values

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 RT_{PTS} Calculations for Vogtle Unit 2 Beltline Region Materials at 36 $\text{EFPY}^{(0)}$

Notes:

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(a) Initial RT_{NDT} values are measured values

(b) $\Delta \text{RT}_{\text{PTS}}$ = CF * FF

(c) $M = 2 \cdot 8 (\sigma_i^2 + \sigma_{\Delta}^2)^{1/2}$

(d) $RT_{PTS} = RT_{NDT(U)} + \Delta RT_{PTS} + Margin (°F)$

(e) Data deemed credible per Reference 10.

(M Neutron Fluence value used for all material is the highest value from Table *5-4* for 36 EFPY.

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Table	
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 RT_{PTS} Calculations for Vogtle Unit 2 Beltline Region Materials at 54 EFPY^(f)

Notes:

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(a) Initial RT_{NDT} values are measured values

(b) $\Delta \mathrm{RT}_\mathrm{PTS}$ = CF * FF

(b) $M = 2 \cdot (\sigma_i^2 + \sigma_A^2)^{1/2}$

(c) $RT_{PTS} = RT_{NDT(U)} + \Delta RT_{PTS} + Margin$ (°F)

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(d) Data deemed credible per Reference 10.

(e) Neutron Fluence value used for all material is the highest value from Table *5-4* for 54 EFPY.

6.0 **Refcrcnccs**

- 1. WCAP-14040-NP-A, Revision 4, "Methodology used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves", J.D. Andrachek, et. al.
- 2. WCAP-16142-P, Revision 1, "Reactor Vessel Closure Head/Vessel Flange Requirements Evaluation for Vogtle Units I and 2", Warren Bamford, et. al., February 2004.
- 3. Code of Federal Regulations, I OCFR50, Appendix H, *Reactor I'esscl Material Surveillance Program Requirements,* U.S. Nuclear Regulatory Commission, Washington, D.C.
- 4. WCAP- 11381, *Georgia Power Conmpany Alvin W Ibgtle Unit No. 2 Reactor l Essel Radiation* Surveillance *Program,* L. R. Singer, April 1986.
- *5.* ASTM E23 *Standard Test Method Notched Bar Impact Testing of Metallic h'aterials,* in ASTM Standards, American Society for Testing and Materials, Philadelphia, PA.
- 6. ASME Code Case N-640, "Alternative Reference Fracture Toughness for Development of P-T Limit Curves for Section XI, Division 1", February 26, 1999.
- 7. Section XI of the ASME Boiler and Pressure Vessel Code, Appendix Q *Fracture Toughness Criteria for Protection Against Failure.*
- 8. ASTM E185-82, Annual Book of ASTM Standards, Section 12, Volume 12.02, *Standard Practice for Conducting Surveillance Testsfor Light- atelr Cooled luclear Power Reactor Vessels.*
- 9. Regulatory Guide 1.99, Revision 2, *Radiation Embrittlement of Reactor Vessel Mlaterials, U.S.* Nuclear Regulatory Commission, May 1988.
- 10. WCAP- 15159, *Analysis of Capsule XFrom the Southern Nuclear Vogtle Electric Generating Plant Unit 2 Reactor Jessel Radiation Surveillance Program,* T.J. Laubham, et. al., Dated March 1999. [Note that the Testing/Analysis reports for surveillance capsules U and Y from Vogtle Unit *2 were documented under W'CAP-13007 and WCAP-14532. respectivelu.]*
- I1. CVGRAPH, Hyperbolic Tangent Curve-Fitting Program, Version 4.1, developed by AT] Consulting, March 1999.