

RAS 8626

112 STATE STREET  
DRAWER 20  
MONTPELIER VT 05620-2601  
TEL: (802) 828-2811



FAX: (802) 828-2342  
TTY (VT): 1-800-734-8390  
e-mail: vt dps@psd.state.vt.us  
Internet: http://www.state.vt.us/psd

STATE OF VERMONT  
DEPARTMENT OF PUBLIC SERVICE

DOCKETED  
USNRC

October 7, 2004

October 8, 2004 (9:55AM)

Office of the Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Attention: Rulemaking and Adjudications Staff

Re: Docket No. 50-271  
ASLBP No. 04-832-02-OLA  
Extended Power Uprate at Vermont Yankee Nuclear Power Station

Dear Sir/Madam:

Please find enclosed for filing an original and two copies of the Vermont Department of Public Service Reply to Answers of Applicant and NRC Staff to Notice of Intention to Participate and Petition to Intervene with Exhibits, the Affidavit of William K. Sherman, and Certificate of Service.

If you have any questions about this filing, please call me at 802-828-3088. Thank you for your assistance in making this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sarah Hofmann".

Sarah Hofmann  
Special Counsel

cc: As per Certificate of Service

Template = secy-037

SECY-02

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	Docket No. 50-271
ENERGY NUCLEAR VERMONT	)	
YANKEE LLC AND ENERGY NUCLEAR	)	ASLBP No. 04-832-02-OLA
OPERATIONS, INC.	)	
(Vermont Yankee Nuclear Power Station)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the Vermont Department of Public Service Reply to Answers of Applicant and NRC Staff to Notice of Intention to Participate and Petition to Intervene in the captioned proceeding has been served on the following by deposit in the United States mail, first class, postage prepaid, and where indicated by an asterisk by electronic mail, this 7<sup>th</sup> day of October, 2004.

Alex S. Karlin, Chair\*  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
Mail Stop T-3F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: ask2@nrc.gov

Dr. Anthony J. Baratta\*  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
Mail Stop T-3F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: ajb5@nrc.gov

Lester S. Rubenstein\*  
Administrative Judge  
Atomic Safety and Licensing Board Panel  
Mail Stop T-3F23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: lesrrr@msn.com

Office of the Secretary\*  
ATTN: Rulemaking and Adjudications Staff  
Mail Stop: O-16C1  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: HEARINGDOCKET@nrc.gov

Office of Commission Appellate  
Adjudication  
Mail Stop: O-16C1  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Jay E. Silberg, Esq.\*  
Matias Travieso-Diaz, Esq.\*  
Shaw Pittman, LLP  
2300 N St., NW  
Washington, DC 20037-1128  
E-mail: jay.silberg@shawpittman.com  
matias.travieso-diaz@shawpittman.com

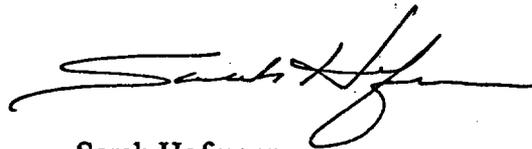
Anthony Z. Roisman, Esq.\*  
National Legal Scholars Law Firm  
84 East Thetford Rd.  
Lyme, NH 03768  
E-mail: aroisman@valley.net

John M. Fulton, Esq.\*  
Assistant General Counsel  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

Raymond Shadis\*  
Staff Technical Advisor  
New England Coalition  
P.O. Box 98  
Edgecomb, ME 04556  
E-mail: shadis@prexar.com

Brooke Poole, Esq.\*  
Robert Weisman, Esq.\*  
Marisa Higgins, Esq.\*  
Office of the General Counsel  
Mail Stop 0-15 D21  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
[bdp@nrc.gov](mailto:bdp@nrc.gov), [rmw@nrc.gov](mailto:rmw@nrc.gov), [mch5@nrc.gov](mailto:mch5@nrc.gov)

Respectfully submitted,



Sarah Hofmann  
Special Counsel

**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

<b>In Re: Entergy Nuclear Vermont Yankee )</b>	
<b>LLC and Entergy Nuclear )</b>	<b>Docket No. 50-271</b>
<b>Operations, Inc. )</b>	
<b>(Extended Power Uprate at VY) )</b>	<b>ASLBP No. 04-832-02-OLA</b>

**VERMONT DEPARTMENT OF PUBLIC SERVICE  
REPLY TO ANSWERS OF APPLICANT AND NRC STAFF  
TO NOTICE OF INTENTION TO PARTICIPATE  
AND PETITION TO INTERVENE**

**INTRODUCTION**

If the strict standards applicable to Petitions to Intervene were applicable to Answers to such Petitions, large portions of the Answers filed by the NRC Staff (Staff)<sup>1</sup> and by Entergy Nuclear

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<sup>1</sup> Pursuant to 10 CFR §2.309(h)(1) an Answer to a Petition to Intervene may only be filed by the “ applicant/licensee, the NRC staff, and *any other party to a proceeding*” (emphasis added). On its face, §2.309(h) limits answers to parties by following the listing of the Applicant and the NRC staff by the language “and *any other party*” (emphasis added). Thus, as used in §2.309(h), the Staff and Applicant, are deemed to be parties and the Staff’s right to file an answer is dependent upon it having party status. In addition, the Commission has noted the Staff may not take a position on any issue in proceedings under Subpart L where the Staff is going to take action independent of the hearing process:

In no event, however, should the staff’s explanation set forth a position on, or otherwise assume an advocacy position with respect to the contested matter in the adjudication before the presiding officer.

69 Fed. Reg. 2182, 2228 (January 14, 2004) (Statement of Considerations). By filing an Answer the Staff has elected to be a party. By taking a position on the merits of Contentions the Staff has determined it will not take action on the Proposed Amendment independent of the hearing process. We believe the Staff should be a party to this proceeding. Its decision to not act independently of the hearing process illustrates appropriate respect for the importance of the full exploration of the issues in a hearing, albeit a less full hearing than DPS believes is required.

Vermont Yankee (Applicant) would have to be rejected for failing to provide sufficient specificity, bases and supporting evidence, for impermissibly challenging NRC Regulations and for failing to submit arguments that, even if accepted, would alter the outcome of the proceeding.

Applicant, and to some extent the Staff, have based their arguments, not on the contentions filed by the Vermont Department of Public Service (DPS), but on their own rewriting of those contentions. No portion of 10 CFR Part 2 authorizes any party to restate the contentions of a petitioner much less to build their argument against intervention around the restated contention. By doing so, Applicant, and the Staff to a more limited extent, have submitted arguments which should be rejected on their face as irrelevant to the issues now before this Board. In addition, Applicant and the Staff have based much of their arguments not on the admissibility of the contentions, which is the issue, but on the admissibility of the bases offered in support of the contention and even on the admissibility of the supporting evidence. Nothing in 10 CFR Part 2 authorizes the Board to rule upon the admissibility of the bases or supporting evidence offered nor to limit either the bases or the supporting evidence which may be used when a contention is accepted. Applicant and the Staff repeatedly argue against the admissibility of a contention or a basis not by arguing that the contention or basis does not raise an issue which is appropriate for litigation, but by arguing that there is contrary evidence which, in the view of Applicant or the Staff, supports an opposite and more correct conclusion. However, at the contention admissibility stage the Board is not passing on the merits of the contentions, but on whether the petitioner has presented a contention which raises a genuine factual dispute which warrants a hearing.

10 CFR §2.309(f)(1)(vi). By presenting contrary evidence to that presented by DPS, Applicant and the Staff have conceded the contention does raise genuine factual disputes that warrant a hearing. *In the Matter of Duke Energy Corporation*, (Catawba Nuclear Station, Units 1 and 2), Docket No's. 50-413-OLA, 50-414-OLA, ASLBP NO. 03-815-03-OLA, LBP-04-10 at 42 (April 2004), 2004 WL 1398219 (NRC).

To the extent the Board chooses to address the merits of the bases and supporting evidence offered by DPS, it is significant that only DPS provided any admissible evidence. The DPS submittal on Contentions 1-4, including the bases and supporting evidence and the opinions offered with regard to such bases and supporting evidence, were presented, and attested to, by a qualified expert<sup>2</sup>. The contrary opinions, interpretations of documents and factual claims by Applicant and the Staff in opposition to Contentions 1-4 represent nothing more than the unsworn assertions of lawyers.

#### **STATE RIGHTS**

Although Applicant and the Staff point to NRC regulations that establish some criteria on the extent to which a State has rights to participate once a hearing has been established (see 10 CFR

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<sup>2</sup>In the position of Vermont State Nuclear Engineer, a position held since 1988, Mr. Sherman brings special qualifications as an expert witness. Part of his responsibilities include following the activities of Vermont Yankee on a day-to-day basis. He exercises his responsibility under a Memorandum of Understanding (MOU) between the Department of Public Service and Entergy, latest revision dated July 30, 2001 (see Exhibit 34). This provides for daily plant status notifications from Entergy and access to Vermont Yankee documents, many of which are reviewed at, but not taken from, the plant site. In considering the expert opinion offered, the Board should give special attention to Mr. Sherman's particular qualifications.

§2.315 ( c)), they do not and cannot dispute the fact that 42 U.S.C. §2021(l) guarantees every state that the NRC “shall afford reasonable opportunity for State representatives to offer evidence, interrogate witnesses, and advise the Commission as to the application” for any licensing amendment authorizing operation of a nuclear reactor whether or not a hearing is to be held. Nothing in §2.315 ( c) purports to limit the rights created by the statute but merely specifies the procedures that apply to the participation of a state in a hearing that has been convened because other parties have admitted contentions. The legislative history of the statutory provision provides an equally clear and unlimited statement of the rights guaranteed:

Subsection 1. provides appropriate recognition of the interest of the States in activities which are continued under Commission authority. Thus, the Commission is required to give prompt notice to the States of the filing of license applications and to afford reasonable opportunity for State representatives to offer evidence, interrogate witnesses, and advise the Commission as to the application.

Senate Report No. 870,1959 U.S. Code Congressional and Administrative News, p 2883.

The rights provided by 10 CFR §2.315 ( c) are not exercisable until after the Board has determined if there are any admissible contentions further underscoring the fact that §2.315( c) is not intended to fully implement all the rights provided by 42 U.S.C. § 2021(l). Otherwise, the Regulation would read out of existence the plain language of the statute which does not condition the right of the state to participate with respect to a licensing amendment on whether the NRC has identified an admissible contention. In fact, since the Statute explicitly grants the right to present evidence and cross-examination without the State ever having to take a position on the merits, a reading of the Regulation to

prohibit the State from participation unless there were an admissible contention would, in a case where no other entity sought to challenge the proposed amendment, effectively deny the State a right explicitly guaranteed by the Statute. We believe the Board should not read the Commission Regulations to be in direct conflict with a statutory mandate where the language of the statute is susceptible to an interpretation which does not conflict with the statute. In this case, §2.315 ( c) should be read only to prescribe certain procedures to be followed in a situation where an entity other than the State has presented a contention which has been found to be admissible and then only as to the particular hearing convened for the purpose of resolving that contention. The far reaching reading of §2.315 ( c) urged by Applicant and the Staff would put it in direct conflict with the AEA. The Board should not assume that the Commission has chosen to ignore the precise language of a statutory provision, particularly where the Commission does not indicate that in adopting §2.315( c) it was intending to foreclose any other application of the state rights guaranteed by 42 U.S.C. § 2101(l).

The AEA requires a hearing whenever a proposed amendment presents a “significant hazard consideration”. 42 U.S.C. §2239. Because §2101(l) guarantees the State certain rights when there is a right to a hearing, it is important for the Board to determine whether the proposed amendment is one which requires a hearing in order to determine whether the rights guaranteed to the State under §2101(l) are applicable here. A critical factor used by the Courts in determining whether a significant hazard is present and whether a hearing is required is whether the proposed amendment provides the licensee with greater operating authority. *See In re Three Mile Island Alert, Inc.*, 771 F.2d 720 (3d

Cir.1985) *TMI* ), *cert. denied*, 475 U.S. 1082, 106 S.Ct. 1460, 89 L.Ed.2d 717 (1986)(where the Court distinguishes the case before it, where no hearing was required, because the licensee has given “no greater operating authority”( *id.* 771 F.2d at 729)) and *Kelley v. Selin*, 42 F.3d 1501 (6<sup>th</sup> Cir. 1995)(where the Court found no hearing was required because the actions proposed “do not grant Consumers the right to operate Palisades in any greater capacity than the plant had previously been allowed to operate” ( *id.* 42 F.3d at 1515)). In this case Applicant seeks a substantial alteration in its operating authority - an increase of 20% in the thermal output of VY- and thus the proposed amendment meets the Court recognized standard for when a hearing must be held.

The Commission has codified the factors to be evaluated in determining whether a significant hazard consideration is present in 10 CFR §50.92 ( c):

(c) The Commission may make a final determination, pursuant to the procedures in § 50.91, that a proposed amendment to an operating license for a facility licensed under § 50.21(b) or § 50.22 or for a testing facility involves no significant hazards consideration, if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

DPS has raised considerations involving all three factors in its Contentions. First, the proposed used of containment overpressure to meet NPSH requirements following a LOCA may significantly increase the consequences of the LOCA. Second, it may also involve a new or different kind of

accident in that the NRC has never evaluated the consequences of an accident at VY on the basis of its operating at 20% more power than its initial authorization. This increased power level creates substantial changes in the nature of the accident analyses including requiring consideration of the special problems created in maintaining NPSH at the required levels following a LOCA, problems which do not exist when the plant is operated at its initially approved thermal power level of 1593 MWt. Third, because the use of containment overpressure to provide required NPSH eliminates one of the components of defense in depth, the proposal may significantly reduce the margin of safety.

Although Applicant asserts in its Application that increasing the power level by 20% does not involve a “significant hazard consideration”, the assertion is absurd on its face. More heat, more radiation, more force released in the event of an accident, more problems to cope with in the accident, all lead to “significant hazard considerations”. The fact that Applicant may believe that when properly evaluated it will be seen that there is no significant hazard involved is beside the point. The focus in determining whether a hearing must be held is not on whether the result of the hearing will be that no significant hazard was created but on whether a legitimate issue has been raised regarding the existence of a “significant hazard”. In *San Luis Obispo Mothers for Peace v. NRC*, 799 F.2d 1268 (9<sup>th</sup> Cir. 1986) the Court held:

The regulations thus appropriately require a hearing before the proposed license amendment becomes effective whenever the amendment *creates the possibility* of a new or different kind of accident. Petitioners have identified such an accident and they should have been granted a prior hearing.

*Id.* 799 at 1270 (emphasis in original).

Therefore, DPS, as the designated representative of the State of Vermont, is entitled to the hearing rights guaranteed to it under 42 U.S.C. § 2101(l). Nothing in the statute or in NRC regulations limits the right of DPS to present evidence and cross-examine witnesses where, as here, a hearing must be held. Thus, even if the Board were to determine that no admissible contention has been presented and that pursuant to Part 2 no Subpart L or Subpart G hearing is to be held or even that an admissible contention has been presented but only a Subpart L hearing will be conducted, the rights guaranteed to DPS under the statute are not diminished. Although DPS could exercise its rights without identifying the topics on which it seeks to present such evidence and interrogate witnesses, DPS has chosen to define the specific subjects of interest to it by filing contentions and seeking party status and admission of those contentions under §2.309. DPS has not waived its rights under 42 U.S.C. §2021(l) or 10 CFR §315(c).

#### **RELEVANT LEGAL STANDARDS**

Applicant and the Staff devote several pages to the proposition that a contention must meet strict tests before it can be admitted. DPS acknowledges there are strict standards for admissibility of contentions. However, Applicant and the Staff go far beyond those standards in their Answers. Because their arguments are at odds with the plain language of the regulations, we believe a brief review of the relevant provisions is necessary.

The issue which the Board is asked to resolve at this stage, other than standing, which is not an

issue with respect to DPS, is whether one or more contentions offered by DPS are admissible. “[T]he Atomic Safety and Licensing Board designated to rule on the . . . petition for leave to intervene will grant the . . . petition if it determines that the . . . petitioner has standing . . . and has proposed at least one admissible contention that meets the requirements of paragraph (f) of this section.” 10 CFR §2.309 (a). Subparagraph (f) requires the contention be set forth with “particularity”, that it contain a “specific statement of the issue of law or fact to be raised or controverted” and that it be accompanied by a number of other items, including “a brief explanation of the basis for the contention \* \* \* a concise statement of the alleged facts or expert opinions which support the . . . petitioner’s position on the issue \* \* \* [and] sufficient information to show that a genuine dispute exists with the applicant . . . on a material issue of fact or law.” 10 CFR §2.309 (f)(1). Nothing in Part 2 provides any support for the arguments advanced by Applicant and the Staff that the Board is to pass upon the admissibility of bases or supporting evidence. See St. Ans. at 10, 11,12,14,15,17-20, 22-25; App. Ans. at 14,16-19, 21-27, 30-32, 34-36

At no point in the regulations is the petitioner required to plead the bases or the supporting evidence with specificity<sup>3</sup> or to provide a listing of all the bases or supporting evidence upon which petitioner intends to rely in the hearing. In fact, by requiring only that the statement of bases be “brief” and the supporting evidence be “concise” the regulations clearly contemplate much more will be presented once the contention is admitted. The Commission has been clear that while a genuine dispute

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<sup>3</sup> Specific reference is to be made to the portions of the application which petitioner disputes. 10 CFR §2.309 (f)(1)(vi). As discussed below, DPS has done that.

warranting a hearing must be shown, a petitioner does not have to prove its contention at the pleading stage. *In the Matter of Private Fuel Storage L.L.C.*, (Independent Spent Fuel Storage Installation) NRC Docket No. 72-22-ISFSI CLO-04-22 at 8 (August 17, 2004), 2004 WL 2049726 (NRC).

The issue now is whether the contention is admissible. Applicant apparently recognizes it is not allowed to focus on the admissibility and/or specificity of bases because, rather than evaluate the contentions as offered by DPS, it restates the contentions to merge the bases and the contention into one contention and argues against its own version of DPS's contentions. DPS has rejected Applicant's restatement and continues to press for admissibility of the contention as presented, against which Applicant offers no argument.

The Answers also treat each basis and each piece of supporting evidence offered as to each contention as a separate statement in support of the contention, arguing that because a particular basis or particular piece of evidence, standing alone, does not adequately support the contention, the contention should be rejected. The regulations contemplate exactly the opposite result. Contention admissibility is to be judged by the totality of factors listed in §2.309(f)(1). In addition, because it is the contention which is admitted, not the bases or the supporting evidence, it follows that once a contention is admitted, the contention may be supported by any evidence and bases<sup>4</sup>. Other parties are free to challenge those

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<sup>4</sup> "There is no regulatory requirement that an intervenor supply all the bases known at the time he files a contention. What is required is the filing of bases that the intervenor intends to rely on." The question in determining whether to admit a new basis for an already admitted contention is whether it is timely to consider the new basis, in light of its seriousness and of the timeliness with which it has been raised. "The more serious an issue, the more important it is for this Board to consider it. We can, indeed, always determine that a serious issue that falls within the scope of an admitted contention must

bases and evidence when offered under the rules applicable to the form of hearing granted, but not to seek or obtain a preliminary ruling at the contentions admissibility stage on the admissibility of any basis or supporting evidence with regard to an admitted contention.

Applicant and the Staff base many of their arguments on the assumption that the Board is to resolve disputes over the evidence in deciding whether to admit a contention. St. Ans. at 7, 8, 10, 11, 15, 17, 19, 22-24; App. Ans. 17, 18, 19, 21-27, 29-32, 34-36. Such an approach to admissibility of contentions is directly contrary to the language of the regulations and makes no sense. The regulations require that petitioner submit “sufficient information to show that a genuine dispute exists with the applicant . . . on a material issue of law or fact.” If the Board were required to resolve these disputes, there would be no need for the summary judgment procedures contained in Subparts G and L. In addition, since the contentions are presented before any discovery, even the mandatory discovery provided by 10 CFR §2.336, and the regulations require only a “brief explanation” of the bases and a “concise statement” of the supporting evidence, it would be unreasonable to expect petitioner to be in a position to present all the reasoning in support of each basis and all the evidence which demonstrates why a contention and its bases are factually correct.<sup>5</sup> If such a requirement existed, the Board would

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be considered in order to assemble an adequate record.”  
*In the Matter of Georgia Power Company* (Vogtle Electric Generating Plant, Units 1 and 2), 40 N.R.C. 37 at 2, 1994 WL 612194 (NRC) (July 1994)

<sup>5</sup> At a minimum, if the contention admissibility stage of the proceeding were a summary judgment proceeding, the protections provided by the summary judgment procedures should be

end up holding an evidentiary hearing to determine whether it should hold an evidentiary hearing. Clearly the regulations do not require such an absurd result. The regulations contemplate something more in the nature of a proffer of evidence that, if proven correct, would support the contention and bases.<sup>6</sup>

The Answers submitted by Applicant and the Staff, to the extent they argue, by reference to other documents and other evidence, that DPS is in error in its factual assertions, actually demonstrate that the contention to which those facts are relevant is a contention as to which a genuine dispute as to material facts exists and thus the contention is admissible. The regulations would not have focused on the existence of a dispute as the basis for admissibility of a contention if it were the Board's task to resolve that dispute in deciding whether to admit a contention<sup>7</sup>.

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followed including that 1) evidence offered by way of affidavit would have to be countered by contrary affidavit evidence, 2) where additional discovery was needed to properly respond to the motion an opportunity for such discovery would be provided and 3) all inferences that can be drawn from the evidence would be in favor of the party opposing summary judgment. Since neither Applicant nor the Staff have countered the affidavit evidence offered by DPS, they can not possibly prevail under a summary judgment standard.

<sup>6</sup> The Staff cites to the Yankee Rowe case for the proposition that the Board is required to determine whose view of the facts is correct in passing on the admissibility of contentions. The case does not support such an extreme view as evidenced by the quoted language in the Staff's brief. All the Board in that case is recognizing is that in evaluating whether the particular evidence upon which petitioner relies actually supports the proposition for which it is cited the Board should look at the entire document. That is much different than the proposition offered by the Staff which is that the Board should not only look at the document relied upon by petitioner but on any other documents which, according to the Staff, would support the opposite conclusion from the one advanced by DPS.

<sup>7</sup>The ASLB has found that although an applicant put forth "extensive arguments that really go to the merits" of an issue which was the focus of a contention, that even though some of those arguments may prove to be meritorious, they are not grounds for rejecting those portions of a contention that the ASLB find to be admissible. The ASLB went on to find that despite Applicant's

## ARGUMENT

### A. Contentions

Applicant and Staff give short shrift to the proper legal standard to apply in deciding whether to grant the admission of a contention, but then totally ignore that legal standard in their argument. We agree that “bald or conclusory allegations that . . . a dispute exists” are unacceptable (Entergy’s Answer (App. Ans.) at 10 citing *Conn. Bankers Ass’n v. Bd. of Governors*, 627 F.2d 245, 251 (D.C. Cir. 1980)) and that the burden on the proponent of the contention is to “make a minimal showing that material facts are in dispute” (*id.*). We also agree that a contention should be rejected if there are “no facts to support [our] position and [if we] contemplate using discovery or cross-examination as a fishing expedition”. App. Ans. at 10 citing 54 Fed. Reg. at 33,171. No fair reading of the DPS contentions could possibly conclude that DPS failed to meet these standards or that DPS intends to use discovery or cross-examination to aimlessly look for evidence to support its contentions. The numerous documents

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and the NRC Staff’s claims to the contrary, Intervenor did support three parts of its contention with “expert opinion, documentary material, and with a reasonably specific explanation and fact-based argument sufficient to meet the requirements of the contention admissibility requirements in this regard.” Additionally, the ASLB found that the parties differing on the meaning and import of various facts, statements from documents, and other evidence within the basis for the contention illustrated a “genuine dispute” rather than negating it, or any other requirement for an admissible contention. *In the Matter of Duke Energy Corporation*, (Catawba Nuclear Station, Units 1 and 2), Docket No’s. 50-413-OLA, 50-414-OLA, ASLBP NO. 03-815-03-OLA, LBP-04-10 at 42 (April 2004), 2004 WL 1398219 (NRC).

submitted in support of the contentions<sup>8</sup> and pages of meticulous discussion of the meaning of those documents, supported by and supplemented with the opinion of a highly qualified technical expert, belie any suggestion that DPS has made bald or conclusory assertions or that there are no facts which support its position. Between them Applicant and the Staff use dozens of pages just to attempt to demonstrate that the many bases and substantial supporting evidence offered by DPS are wrong but, significantly, they never charge that DPS failed to offer bases and evidence in support of its contentions, only that they disagree with the bases and the evidence.

It is significant that substantial portions of the evidence offered by DPS to support the bases and contentions are not addressed in the Answers. For example, the entire discussion under the First Contention of the critical role of defense in depth in nuclear reactor safety and how the use of containment overpressure violates that principle, is ignored in the Answers although this is the central feature of that Contention. In the interest of efficiency DPS will focus this Reply primarily on what the

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<sup>8</sup> Although Applicant and the Staff make reference in their Answers to numerous documents, no documents are appended to their pleading and there is not even an affidavit attesting to the accuracy of the statements made about the documents. Neither DPS nor the Board has any basis on this record to test the accuracy of the assertions made or to scrutinize the document "both for what it does and does not show." NRC Staff Answer (St. Ans.) at 10 quoting from *Yankee Atomic Elec. Co.* (Yankee Nuclear Power Station), LPB-96-2, 43 NRC 61, 90 *rev'd in part on other grounds*, CLI-96-7, 43 NRC 235 (1996). Opponents of intervention and contentions also have obligations that they must strictly meet and suffer the consequences of their failure to strictly comply with those obligations. Thus, DPS will oppose any attempt to amend the Answers or to introduce documents at the hearing on the admissibility of contentions. Nor is it relevant that some or even all of the documents may be publicly available. It is not appropriate to impose upon DPS or the Board the obligation of rounding up all the cited documents, even where, as in the case of the Staff, but not the Applicant, Adams Accession numbers are provided.

Answers do attack, but re-emphasizes that all the supporting evidence is a critical part of the support for each Contention.

#### First Contention

**Applicant Has Claimed Credit for Containment Overpressure in Demonstrating the Adequacy of ECCS Pumps for Plant Events Including a Loss of Coolant Accident in Violation of 10 C.F.R. §50, Appendix A, Criteria 35 and 38<sup>9</sup> and Therefore Applicant Has Failed to Demonstrate That the Proposed Uprate Will Not Create a Significant Hazard as Required by 10 C.F.R. §50.92 and Will Not Provide Adequate Protection for the Public Health and Safety as Required by 10 C.F.R. §50.57(a)(3).**

The single, specific issue raised by the contention is whether taking credit for containment overpressure to demonstrate the adequacy of the ECCS pump operation in the event of a LOCA violates Design Criteria 35 and 38. With respect to the factors listed in §2.309(f)(1) neither Applicant nor the Staff claim 1) the contention fails to provide a specific statement of the issue of law or fact to be

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<sup>9</sup> Vermont Yankee is committed to the draft general design criteria published July 11, 1967 (32 FR 10213) (DPS Exhibit 1). The corresponding criteria are Draft Criteria 41, 44 and 52. Draft criteria 41 was inadvertently omitted from footnote 6, page 6, of the DPS Notice of Intention to Participate and Petition to Intervene filed on August 30, 2004.

raised, 2) the contention is outside the scope of the hearing, or 3) the contention is not material to the findings the NRC must make. Their sole basis for attack, although as noted above incorrectly characterized as an attack on the admissibility of the bases or the supporting evidence, is that DPS has failed to provide sufficient information to show that a genuine dispute exists on a material issue of law or fact. As discussed below, this challenge should be rejected because it misinterprets the point which DPS is making and misapplies the relevant law on admissibility of contentions.

The Answers do not challenge DPS's analysis that defense in depth by multiple fission product barriers will be lost by allowing one barrier failure - containment failure - to compromise the effectiveness of two critical safety systems - containment and ECCS pump operation and eventually compromise the two remaining fission product barriers, fuel cladding and the reactor coolant system. Nor do they challenge the analysis that if containment overpressure is not sufficient to provide the needed NPSH the result, under licensing basis considerations, will be that a failure of containment will cause the failure of ECCS pump operation which will eventually result in a failure of the fuel cladding and reactor coolant system (as the initiating event). Their disagreement focuses on some of the evidence upon which DPS relies to support the position that containment overpressure use compromises defense in depth.

The crux of the disagreement expressed is the role of Regulatory Guide 1.82, Rev. 3. At the time of filing the Petition, DPS could not know the extent to which Applicant would seek to defend its use of containment overpressure by relying on the language in that Regulatory Guide which reflects a

limited acceptance by the Staff of containment overpressure when certain conditions are met. Thus, it was necessary to point out why that Regulatory Guide should not be used as support for the use of containment overpressure. In addition, it was not clear, although it is now clearer, that the ACRS would be likely to focus on the overpressure issue in the context of the VY uprate. It now appears that ACRS may do so in light of the fact that DPS has now formally requested the ACRS address this issue as part of its review of the proposed VY uprate. If Applicant and the Staff stipulate that they will not use the existence of the limited authorization for containment overpressure, as well as other provisions, in Regulatory Guide 1.82, Rev. 3 as evidence to support their view that the uncertainties identified in that Guide and in ACRS minutes and letters are not sufficient to disqualify the use of containment overpressure credit for this proposed uprate, DPS believes the validity of that Regulatory Guide or compliance with its conditions on using containment overpressure would be moot. However, that seems unlikely given that the Answers point to the fact that the Regulatory Guide was issued, while ignoring all the caveats expressed by the Staff and the ACRS regarding its issuance, to support the view that the question of uncertainties has been resolved. Thus, until such a stipulation exists, the legal status of the Regulatory Guide and the weight to give it remains an issue for this hearing.

Moreover, Applicant and the Staff mistakenly believe that when DPS cites other provisions of the Regulatory Guide, earlier versions of this Regulatory Guide, Regulatory Guide 1.1, ACRS letters and transcripts of ACRS hearings it cites them for their legal status as requirements which must be met by Applicant. DPS cites these materials as evidence of the opinion of respected experts that support the

position urged by DPS. Under the normal rules of evidence an expert, like Mr. Sherman, may rely upon the opinion of other experts in forming his opinions. *See* Rule 704 of the Federal Rules of Evidence. In addition, the opinion of the ACRS as expressed in the Report it will eventually issue in this matter is required to be offered in evidence since the Staff is now a party to this proceeding. 10 CFR §2.337(g)(2)(ii).

Clearly there is a disagreement among the parties regarding the issue of whether the ACRS has or has not signed off on the type of containment overpressure credit which is being used here by Applicant. The Staff asserts the ACRS has specifically approved the use of containment overpressure citing, but not producing, a December 12, 1997 ACRS letter. *St. Ans.* at 7-8. DPS, citing a more recent ACRS document asserts the ACRS has not "properly evaluated" containment overpressure. The failure to properly evaluate the issue does not mean Regulatory Guide 1.82, Rev. 3, has less legal stature, but that ACRS retains doubts about the wisdom of using containment overpressure which, DPS believes are based on the same concerns expressed by its expert: uncertainty in the post-LOCA calculations of the extent to which debris will reduce NPSH and uncertainty in the post-LOCA calculation of the extent, stability and duration of containment overpressure. Even the alleged ACRS approval comes with a series of limitations including that such overpressure approval be selectively applied. *Id.*

In its Answer Applicant acknowledges that its basis for using containment overpressure was that without the use of the overpressure it could not meet NPSH requirements. *App. Ans.* at 18. It asserts

that this proves that it has a shown containment overpressure use is “necessary”. This interpretation of the meaning of the Regulatory Guide 1.82, Rev. 3 requirement that containment overpressure be used to meet NPSH requirements only when “necessary” to meet NPSH requirements turns the Regulatory Guide language into nothing more than a meaningless tautology. If that were all that was required, there would be no reason to limit containment overpressure to cases where it was “necessary” since it would never be used in any case where it was not “necessary”.<sup>10</sup>

Applicant (Ans. at 19) asserts that DPS has failed to identify a factual basis that plant operations or equipment can be practicably altered to avoid taking credit for containment overpressure, and complains that DPS had the responsibility to identify what alterations it believes were practicable. Applicant is mistaken in its assertions. DPS identified at least two steps that could be taken to meet NPSH without using containment overpressure. First, only operate at the highest increased power level at which containment overpressure is not required and second, modify existing plant equipment or bring in new equipment to maintain NPSH without the use of containment overpressure. Applicant, challenging DPS to demonstrate that a practicable alternative exists, implicitly suggests that none exists of which it is aware. That implication is false. Pinch Point Summary - Torus Water Temp/ECCS Pump NPSH (Exhibit 33) is a section from the Applicant’s June 2002 feasibility study for extended power

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<sup>10</sup> Applicant’s facile definition of the word “necessary” puts one in mind of Humpty Dumpty who, in Lewis Carroll’s *Through The Looking Glass* said “When I use a word . . . it means just what I choose it to mean -- neither more nor less.” By reducing the word “necessary” to meaninglessness Applicant puts one in mind of the King in Lewis Carroll’s *Alice In Wonderland* who said “If there’s no meaning in it . . . that saves a world of trouble, you know, as we needn’t try to find any’.”

update that includes the following heading and description:

Pinch Point Summary - Torus Water Temp/ECCS Pump NPSH  
Description

The Appendix R safe shutdown is the most limiting analysis for peak torus temperature. Re-analysis using realistic, conservative assumptions, should result in assurance of adequate ECCS pump NPSH. If re-analysis does not assure adequate NPSH, an increase in RHRSW flow may be needed to limit pool temperatures to the current limit.

Thus, Applicant's own feasibility study had already identified a practicable alternative which could be used to meet NPSH requirements other than the use of containment overpressure. Exhibit 33 demonstrates that 1) a practicable alternative exists to avoid crediting containment overpressure, 2) this alternative was considered by Applicant, and 3) this alternative was rejected in favor of claiming containment overpressure credit, despite the regulatory guidance and expert opinions expressed in Sections 2.1.1.1 and 2.1.1.2 of Regulatory Guide 1.82, Rev. 3<sup>11</sup>.

In any event the point which DPS is making in its First Contention, using the evidence from the actions of the Staff in adopting Regulatory Guide 1.82, Rev. 3 and Regulatory Guide 1.1 plus the information contained in the ACRS transcripts, among other sources, is that the use of containment

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<sup>11</sup> The Applicant's failure to disclose its consideration and rejection of an alternative to avoid containment overpressure credit, either to the staff in its Application, or to the Board in its Answer, suggests Applicant does not intend to be forthcoming in providing information in this proceeding. Thus, the credibility of the Applicant's document disclosures pursuant to 10 CFR §2.336 or of the testimony it will offer in the hearing are in serious question. Now there is evidence that even if credibility of witnesses were a required component of a request for a Subpart G hearing (see contrary discussion *infra.*) the Board has another basis to determine that the more formal procedures of Subpart G will be required to ensure development of an adequate record for decision. As noted *infra.*, this is not the only instance of Applicant's lack of candor and failure to be fully forthcoming in its filing with this Board.

overpressure represents a departure from pre-existing safety standards set forth in Design Basis Criteria 35 and 38 because it involves abandonment of defense in depth. The evidence forms the basis for an inference that both the Staff and more specifically members of the ACRS are concerned about this abandonment of defense in depth which is more than sufficient to justify a hearing on the issue of whether abandonment of defense in depth will allow the Applicant to prove that its proposed amendment will provide adequate protection for the public health and safety. The ACRS believes, in at least some cases, an Applicant cannot prove that and thus recommends using containment overpressure to meet NPSH requirements selectively, not, as Applicant would have it, whenever it is "necessary" to meet NPSH requirements. Regulatory Guide 1.82, Rev. 3, at least when read as written, similarly suggests there must be some cases where use of containment overpressure is unacceptable. DPS contends this is such a case. Now that the ACRS is likely to address the issue in its review of the proposed uprate, the Board and the parties will have the benefit of both the views of individual ACRS members as expressed during their hearing on the uprate and the views of the ACRS as a group in their letter.<sup>12</sup>

#### Second Contention

**Because of the Current Level of Uncertainty Associated with the Demonstration of the Adequacy of ECCS Pumps, Applicant Has Not Demonstrated That Allowing a Radical Departure from the Defense in Depth Principle Which Prohibits Use of Containment Overpressure to Provide the Necessary NPSH for ECCS Pumps Will Not Constitute a Significant Hazard (10 C.F.R. §50.92) and Will Provide Adequate Protection for the Public Health and**

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<sup>12</sup> Since Applications proposed amendment has been referred to the ACRS by the NRC, the provisions of 42 U.S.C. §2039 are applicable.

**Safety as Required by 10 C.F.R. §50.57(a)(3).**

While the First Contention was focused on the issue that allowing multiple safety barriers to be vulnerable to failure due to the failure of one barrier - losing ECCS pumps and thus fuel cladding protection if the plant also loses the containment barrier - was a violation of the AEA, the Second Contention is focused on the issue that due to uncertainties which remain in the calculation of NPSH following a LOCA and the uncertainties of calculating containment pressure following a LOCA, abandoning defense in depth in this case is unwarranted and will violate the AEA. The crux of the argument advanced in the Applicant's Answer is that DPS has failed to be sufficiently specific in its bases and supporting evidence because it never quantifies the magnitude of the uncertainties which it claims exists. Of course, DPS contends that it is because the magnitude of the uncertainties is not able to be quantified that it is inappropriate to assume, as the application does, that the uncertain containment overpressure will be available in sufficient quantity and for sufficient duration to compensate for the uncertain loss of NPSH.

The Staff, while disagreeing with portions of the bases and supporting evidence for the Second Contention, does agree that a portion of one basis is "admissible". Since the Board is not charged with the responsibility of determining which bases are admissible, it is necessary to "restate" the Staff position. What the Staff is saying is that the Second Contention should be admitted because the requirements of §2.309(f)(1) have been met as to that Contention although the Staff disagrees with some of the bases and supporting evidence on which DPS intends to rely when presenting that Contention during the

hearing. Staff arguments about bases and supporting evidence with regard to the Contention can be addressed by it in the form of motions for summary disposition and/or with challenges to the relevance of evidence offered by DPS.

To the extent the Answers disagree with DPS, they selectively isolate small portions of the supporting evidence and/or the bases, out of the context in which they appear, in order to oppose the contention. For example, Applicant on numerous occasions references the language of introductory statements in the bases or supporting evidence, attacking them because they are general, without then linking those statements to the supporting evidence and examples which follow. Staff, focusing on the language of the bases as restated by Applicant, not as proposed by DPS, complains that the bases alone are insufficiently specific (although nothing in the regulations requires that bases be specific, only that they be brief), while ignoring the supporting evidence which provides substantial detail in support of each basis. Both Answers also either deliberately or negligently distort the point being made by DPS. For example, both Answers criticize the failure of DPS to tie the particular uncertainties noted by ACRS in the calculation of the magnitude of head losses expected from debris blockages at the sumps to the particular calculation done by Applicant. They ignore the real point of the evidence which is to demonstrate that no calculation can be reliable because generically there is insufficient data to reliably predict the magnitude of the head loss. Applicant's calculations all depend upon assumptions about expected head loss which are based upon the incomplete knowledge base identified by the ACRS. What we have here is a classic example of a dispute over a material fact where Applicant and the Staff

assert that the research data is sufficiently precise to reliably predict head loss and DPS and several members of the ACRS disagree.

The Answers also argue that Regulatory Guide 1.82, Rev. 3, because it has been issued, is evidence that there is sufficient certainty in calculating head loss for ECCS pumps in the event of a LOCA, to allow for the use of overpressure credit. DPS has challenged that factual claim by identifying the portions of the ACRS letter and colloquy, as well as the Staff answers to ACRS concerns, that reflect the proposition that the Guide was published to “get it on the street”, i.e. to facilitate discussion of the issues, rather than to reflect resolution of the issue. Again this underscores the genuine factual dispute surrounding this important issue.

At several places the Answers challenge the legal sufficiency of statements made for which no external authority is cited. For example, supporting evidence ¶ 8 refers to the fact that “[f]requently the as-found condition of containment isolation valves from their leakage tests exceeds allowables such that containment leakage is underestimated.” Applicant’s Answer claims that this is an unsupported and conclusory assertion. However, in this case the statement is sworn to as correct by William Sherman, who in his capacity as the nuclear engineer for the State of Vermont has first hand personal knowledge of the testing and operation at VY.

DPS is surprised that Applicant ignores Mr. Sherman’s continuing state oversight expertise by labeling this statement as lacking in any evidentiary support. E.g. App. Ans. at 24 alleging the lack of a “specific factual basis” for statements by Mr. Sherman that VY has frequently found isolation valve

leakage which exceeds allowables and thus that VY's assumed level of containment leakage is underestimated. Mr. Sherman's expert opinion, given his responsibilities for VY oversight, was more than sufficient to meet the supporting evidence standard. However, attached is the Vermont Yankee Adverse Trend Common Cause Analysis Report (Exhibit 32) that demonstrates there is an adverse trend in the as-found leakage rate results in main steam isolation valves (MSIV) at Vermont Yankee. The Report identifies twelve MSIV leakage rate test failures since 1996, and illustrates Vermont Yankee's failure and inability to correct the problems. This Report not only confirms Mr. Sherman's expert opinion but illustrates once again how the Applicant is treating this process as a "game", not as a serious inquiry. Obviously Applicant knew of the existence of this Report and knew it provided factual support for Mr. Sherman's statement. Rather than acknowledge the Report, it sought to score "points" by asserting that Mr. Sherman's statement was without support even though Applicant knew that was not true. Such "gaming" provides further evidence that the Board should not assume that the Applicant's disclosure of documents under §2.336 or testimony will be credible and that the formal procedures of Subpart G are warranted to assure that the Board has the full and true disclosure of the relevant facts.

Thus, the statement by Mr. Sherman is fully supported by an expert with personal knowledge of the facts and represents a summary of his knowledge. Nothing in the Regulations requires a petitioner to provide all of the details behind such a summary at this preliminary stage of the hearing process and if it did it would turn the contention admission process into an unmanageable morass. It is for that reason that the §2.309(f)(1)(v) calls for a "concise statement of the alleged facts or expert opinions" not the

kind of minute detail improperly demanded on numerous occasions by the Answers. The NRC expects the Board to use common sense in implementing these Regulations and where, as here, an expert has personal knowledge of the facts which are summarized and swears to their accuracy, nothing more is or should be required.

Significantly, neither Answer questions the validity of the basic premise of the Second Contention that if there are substantial uncertainties regarding calculations upon which the use of containment overpressure use relies, it would be a violation of the AEA to use containment overpressure to demonstrate that NPSH requirements will be met in the event of a LOCA. Their challenges to selected portions of the evidence are easily addressed.

In 1996 at the time of the resolution of the BWR ECCS strainer blockage issue, the industry and the staff did not recommended allowing licensing basis changes for overpressure credit to resolve ECCS pump NPSH adequacy. Exhibit 30, p. 4-2, 4-3. The reason was that there is a substantial amount of uncertainty associated with the strainer clogging issue. *Id.* p. 1-14, 2-47. Uncertainty and variability in the applications of methods used to calculate NPSH margins was confirmed by review of industry submittals to NRC. Generic Letter 97-04, *Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps* (Exhibit 31, p. 1-7).

In the face of these concerns Applicant seeks this uprate based, in part, on its voluntary decision to take credit for containment overpressure to demonstrate the adequacy of ECCS pumps. As noted above, operation at these higher power levels is not "necessary" and Applicant has not disclosed that it

has identified at least one practicable alternative to requesting containment overpressure credit.

Nowhere in its application, responses to requests for additional information (RAIs) or in its Answer to the DPS petition does Applicant explain how the uncertainties that were the basis for the industry and staff's recommendation at the time of the resolution of the BWR ECCS strainer blockage issue, have now become less uncertain such that it should be allowed to change VY's licensing basis.<sup>13</sup>

The Answers question the relevance of the ACRS opinions expressed in response to the proposed adoption of Regulatory Guide 1.82, Rev. 3 because they assert that Regulatory Guide was focused on PWRs. However, it is evident from the above discussion and Exhibits 30 and 31 that the uncertainties associated with the determination of debris blockage and its impact on NPSH are generic concerns. It is the entire uncertainty related to the demonstration of the adequacy of NPSH for ECCS and containment spray pumps that the staff had in mind when it rejected licensing basis changes to credit overpressure as a resolution option for the strainer blockage issue (see Exhibit 30), and it is likewise because of the level of this entire uncertainty that DPS asserts Applicant has not demonstrated a sound

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<sup>13</sup> Applicant claims to have incorporated conservatisms in its analysis (App. Ans. at 27), supported by an RAI Response (RAI SPSB-C-11). Reference to the RAI SPSB-C-11, and therefore these claims, should not be given weight by the Board since a portion of RAI SPSB-C-11 is redacted and cannot be debated in open prehearing. In addition Applicant did not submit RAI SPSB-C-11 with its filing, either redacted or unredacted under seal, nor has the Applicant opened discussions for consideration of redacted material. Detailed consideration of this material is not ripe at this stage since Applicant's assertion of conservatisms based on this document to counter DPS supporting evidence demonstrating that its expert and other experts believe uncertainties are high, is sufficient to demonstrate a genuine dispute on a material issue of fact. At the hearing and after full disclosure of the document, DPS will be able to demonstrate Applicant's claims of conservatism fail to consider the areas identified below, and that the calculations are not conservative.

basis for abandoning the defense in depth provided by not using containment overpressure to meet NPSH requirements.

In the Petition DPS identified numerous specific uncertainties that have not been quantified and that demonstrate the magnitude of uncertainties which make reliance on containment overpressure to meet NPSH requirements unwarranted and constitutes a failure by Applicant to demonstrate that the proposed uprate would provide adequate protection for the public health and safety. The following are but some of uncertainties either identified in the initial statement of supporting evidence or further elucidated here which have not been addressed by Applicant, in a way that provides a comprehensive assessment of uncertainties vis a vis abandoning the containment pressure safety margin, as seen from a review of its Application and supplements thereto:

#### Uncertainties with determining NPSH required

- Both the residual heat removal and core spray pumps were only NPSH-tested over a limited flow range. Petition at 24-25.
- No head drop was specified on the original curves. *Id.*
- No vibration readings were taken in the NPSH tests for the residual heat removal pumps. *Id.*
- Only one of the four residual heat removal pumps was tested for NPSH required, and this value was assumed correct for the other three pumps. *Id.*
- The core spray pumps' original witness tests for NPSH required do not bracket the expected flow range during accidents. *Id.*
- NPSH required for the core spray pumps was not determined from VYNPS pumps, but rather from pumps from another facility. *Id.*

- For both residual heat removal and core spray pumps, curve fit regimes were used to acquire NPSH required values for specific flow rates used in the demonstration of the adequacy, creating an uncertainty in the precision of the results. *Id.*
- There is no indication in the Application of accounting for instrumentation inaccuracies in test instruments, nor is margin provided to account for the extrapolation of data and assumptions used for actual test data that is lacking. *Id.*
- There is no accounting for change in NPSH required for impeller wear since the original tests. Exhibit 16, Attachment 5.

#### **Uncertainties in determining sump temperature**

- Assumptions must be made for heat transfer to structures, containment leakage, containment sprays, pool surface heat and mass transfer, fan coolers, RHR heat removal heat exchangers, and power conversion systems to maximize the calculated pressure.
- The worst effect single failure must be taken to maximize temperature. A level of uncertainty exists over whether more than one "single failure" will occur.

#### **Uncertainties in determining NPSH available**

- In order to determine strainer head loss, assumptions must be made regarding debris sources, debris generation, drywell debris transport, suppression pool debris transport, and strainer capture of material. Exhibit 30, p. 1-10.
- Examples of uncertainties include the amount of debris that would be generated by a pipe break for various insulation types; the amount of debris that would be transported to the suppression pool; the characteristics of debris reaching the suppression pool (e.g., size and shape); and head loss correlations for various insulation types combined with suppression pool corrosion products, paint chips, dirt and other particulates. *Id.*, p. 1-13.
- While experiments have provided insights for these areas, each area involves a myriad of assumptions and each area has significant uncertainty associated with it. For example, NRC determined that any engineering judgement based on a scarce set of experimental data would have large uncertainties. Therefore NUREG/CR-6224 transport factors could not be defended. *Id.*, p. 1-12.

- The issue of potential strainer blockage is complex, in that head loss across suction strainers is not only a function of the amount of debris, but also of the types and characteristics of debris. The analysis must evaluate the worst case for potential strainer debris loadings, consider the potential for foreign material to be introduced during normal plant evolutions such as refueling and maintenance outages, and evaluate maintenance practices including maintenance of qualified coatings in the drywell and wetwell. Id., p. 1-13-14.
- Extensive quantities of foreign materials have been found in suppression pools despite ongoing foreign material exclusion programs. Id., p. 1-8.
- Regarding sedimentation tests, it was noted that continuous operation of the recirculation ECC and RHR systems in a actual BWR would add additional turbulence to the pool and that this type of turbulence was not considered in tests. Therefore, applying these data to an actual plant analysis will require engineering judgement. Id., p. 2-9.
- Regarding RMI debris, the number of experiments was limited, the data scatter was significant, and not all prototypical situations were explored. Data from another test program contradicts the NRC sponsored programs results. The experimental method using a flat plat strainer likely is not directly applicable to advanced geometry strainers employed in the replacement program. Id., p. 2-27.
- Paint chips were ignored as a clogging debris in Vermont Yankee calculations on the basis of a single experiment with uncertain application to Vermont Yankee's strainers. Exhibit 36.
- Uncertainty exists with regard to Vermont Yankee's treatment of calcium silicate. Test data shows calcium silicate in a debris bed affects pressure differential across that bed in the same manner as the corrosion products. However, that effect under certain conditions is stronger for the calcium silicate particulate. When predicting a debris bed head loss, if the calcium silicate is treated as a simple particulate, it can cause serious under prediction of the head loss under certain conditions. Exhibit 31, p. 7-5. Vermont Yankee did not segregate calcium silicate as a separate particulate, but rather assumed it lumped with other particulates.
- Uncertainty exists with regard to Vermont Yankee's treatment of possible ZnOH precipitation formed from chemical interaction between zinc (in zinc based paints) and water at high temperature. The dissolution/precipitation of ZnOH in water is influenced by the degree of boration. Exhibit 31, p. 1-13. Vermont Yankee plans to add boration to the suppression as part of adoption of alternate source terms (AST).

- Uncertainty exists with regard to chemical reaction with concrete dust. Petition, Exhibit 10, p. 413.

#### **Uncertainties in determining the containment pressure available**

- Assumptions must be made for heat transfer to structures, containment leakage, containment sprays, pool surface heat and mass transfer, fan coolers, RHR heat removal heat exchangers, and power conversion systems to minimize the calculated pressure. Ex. A. p. 1-15.
- Because the NPSH is strongly dependent upon accident scenario, a comprehensive range of accident scenarios must be evaluated to ensure that the minimum pressure is conservatively determined. Id.
- The worst effect single failure must be assumed to minimize containment pressure. A level of uncertainty exists over whether there will occur more than one "single failure."
- Uncertainty also exists in the value that the Applicant uses for containment leakage. Frequently the as-found condition of containment isolation valves from their leakage tests exceeds allowables such that containment leakage is underestimated. Petition at 26.

The issue to be decided in this proceeding is whether the Applicant can demonstrate these uncertainties are resolved to a degree which makes it unnecessary to retain containment overpressure as a feature of defense in depth. Because of their complexity, and especially inability to quantify many of these uncertainties, resolution of this issue cannot be accomplished by mere exchange of paper, but rather requires a hearing with discovery and cross-examination to resolve the issue. This is the classic nuclear safety issue which will depend on engineering judgment and the Board will need to have the benefit of close questioning of each of the engineers offering these judgments to determine the issue.

In both Staff and Applicant Answers, there are distortions of the DPS petition. The Staff Answer first states that DPS Bases 1 and 2 complain the VYC-0808 is not conservative because it does

not incorporate all the provisions of Regulatory Guide 1.82, Rev. 3. St. Ans. at 14. However, the plain reading of Bases 1 and 2 demonstrates that is not what DPS wrote.<sup>14</sup> Instead DPS explains its contentions by stating that the magnitude of impact on strainers and debris loading is unreliable (Basis 1) and that uncertainties are not bounded such that containment pressure credit should be granted (Basis 2). DPS provides examples of evidence to demonstrate this unreliability and unbounded uncertainties, including:

- A statement of an acknowledged expert, Dr. Graham Wallis of the ACRS, about the analysis method of strainer debris loading saying, "My concern is there are so many things which there isn't much of a technical basis for. That these folks come back with some half-baked analysis, which gets accepted. Because nobody knows."<sup>15</sup> Petition at 21, ¶ 3.
- Comments by experts Dr. Wallis and Dr. Letellier, an NRC contractor, regarding a discredited three-region two-phase conical jet model. Petition at 22-23. ¶ 4.
- Evidence of a current ACRS letter questioning the zone of influence (ZOI) models and consideration of chemical reactions, both of which are applicable to PWR and BWR's. Petition at 23, ¶ 5.
- Evidence from Calculation VYC-0808 regarding uncertainties associated with the required NPSH. Petition at 24-25, ¶6.

This evidence is fully sufficient to support the bases of unreliability and unbounded uncertainties alleged

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<sup>14</sup> In fact, here it appears that staff is inappropriately arguing not on the basis of the DPS filing but on the basis of Applicant's unwarranted rewrite of the DPS contention. *Compare* the Staff analysis to App. Ans. at 20.

<sup>15</sup> Staff tries to claim, Ans. at 15, pertains only to pressurized water reactors. This is not correct. It is clear that Dr. Wallis is speaking about research results and analytical methods in general, which pertain both to PWR and BWR plants.

by Contention 2 and none of it is addressed by the Staff.

Staff spends the next part of its Answer, at 14-15, arguing that the Contention should not be admitted because one item of supporting evidence regarding calculation VYC-0808, Petition at 21, ¶ 2, does not raise a litigable issue and is not specific enough. However, the litigable issue is stated in Contention 2, and demonstrated by the Bases. The shortcoming, if present, of a single piece of evidence does not cancel the effect of all the other evidence provided. And finally, unexplainably, just one page later, St. Ans. at 16, Staff accepts eight identified uncertainties with VYC-0808, which go to prove Bases 1 and 2, and invalidate all of Staff's previous argument.

At the bottom of 15 of its Answer, Staff continues to argue inappropriately about the *specific NPSH calculation*. (Italics by Staff in the original). They claim that ACRS comments demonstrating uncertainty and unreliability, Petition at 21-22, ¶¶ 3, 4 and 5, do not call into question the *specific NPSH calculation*. However, the single calculation is not at issue here, but rather whether there is a sufficient basis to conduct any calculation which could reliably demonstrate that using containment overpressure to meet NPSH requirements is acceptable.

### **Third Contention**

**Because Applicant Is Voluntarily Seeking A Change In Design Or Licensing Basis, It Should Comply With Current, More Restrictive Practices Which Relate to the Proposed Design or Licensing Basis Change in Order to Demonstrate That it Will Provide Adequate Protection to the Health and Safety of the Public As Required By 42 U.S.C. §2232(a).**

The Staff agrees that this Contention is admissible, although as noted previously, erroneously

assumes the Board is charged with responsibility to pass on the admissibility of the bases for the Contention. Applicant opposes admissibility of the Contention but, like the Staff focuses on the admissibility of the bases rather than the Contention itself. Neither Answer challenges the premise that Applicant is seeking a change in the design or licensing basis of the plant. The Contention alleges that when that happens by the voluntary action of the licensee, as is the case here - also a fact not challenged by the Answers - the Applicant is required to conform to current, more restrictive, practices with regard to those systems which are impacted by the voluntary design basis change. DPS seeks application of only two of these more restrictive practices. First, Applicant should have to meet more stringent requirements regarding failure of the containment and its appurtenant structures under current rules for single failures. Second, Applicant should have to evaluate the conformance of the VY plant to standards for simultaneous safe shutdown earthquake (SSE) analyses which incorporate the latest understanding of earthquake effects and the current data base of actual seismic events. Neither Answer asserts that VY is in fact in compliance with either of these more stringent requirements and the Staff agrees that the issue regarding compliance with current SSE analyses is appropriate for Board consideration.

Applicant begins its attack on this Contention with the charge that DPS is impermissibly challenging NRC regulations by demanding that VY meet the more stringent current standards rather than the standards imposed on it initially over 30 years ago. Nothing could be further from the truth. The crucial difference between this case and a backfit subject to 10 CFR §50.109 is that the alteration to the design and licensing basis for VY is one voluntarily undertaken by Applicant, not imposed by the

Staff. The “backfit” rule is not applicable to such cases as is evident from the example provided by Regulatory Guide 1.183, cited by DPS in its Petition. Thus, DPS offers the Regulatory Guide as evidence of a position of the Staff, as experts on the issue, not as a legally binding authority, that where a design basis has been implemented by an Applicant voluntarily, re-evaluating the plant in light of current more restrictive criteria that are implicated by the proposed design basis change does not implicate the “backfit” rule. Applicant disagrees. The purpose of the requested hearing is to resolve the dispute.

The next argument, advanced by both Answers, is that the proposed uprate does not implicate any other plant systems for which re-evaluation is required. The arguments ignore the facts presented by DPS. First, DPS explains that because containment integrity is essential to the use of the containment overpressure (i.e. if the containment loses integrity there may not be sufficient pressure to meet NPSH requirements) the containment integrity should be evaluated in light of current standards. Second, DPS focuses on the single failure analysis which now requires consideration of certain specific events, which DPS identifies. Petition at pp. 30-31, ¶ 5. Applicant ignores these facts and asserts that since it does not describe any “changes in the VY single failure criteria” it follows that DPS is wrong in saying there should be such a change. Merely asserting that it disagrees with DPS demonstrates that there is a genuine factual dispute directly relevant to the proposed amendment and Applicant has done nothing to show the dispute is not genuine or relevant to the application. The Staff takes a different tack, complaining that DPS failed to reference the portion of the Application where the single failure analysis appears. St. Ans. at 19-20. Since DPS argues that the analysis fails to include specific single failures,

there is little point in mentioning the specific section of the Application where the missing analyses should have been included. DPS explains, the Staff does not rebut, which additional analyses are required and that they have not been included in the Application. The Staff confirms this by looking at the relevant section of the Application (actually an RAI response in a Supplement to the Application) and quoting the description of a single failure analysis conducted. It is evident the single failure analysis did not include the parameters specifically identified by DPS as required to be evaluated. Petition at 31, ¶ 5. Both Answers assume that because some single failure analysis was done, it must be acceptable but fail to challenge DPS's statement that current single failure analyses require a more comprehensive consideration of single failures and that Applicant has not conducted those analyses.

With respect to the need to reevaluate containment integrity at VY in light of current earthquake criteria for the SSE, the Staff acknowledges this is a legitimate issue for the hearing, although improperly seeks to limit the bases and evidence which can be used to support the issue and Applicant rejects this issue in toto. The Staff quarrels with DPS statements, sworn to by the Vermont State Nuclear Engineer based on his specific knowledge of VY (see fn. 2. *supra.*), regarding VY performance on leakage tests and the consequences of the failure of the containment to retain pressure for at least 50 hours post-accident for the NPSH if containment overpressure credit is needed. The case cited, *Systems Energy Resources, Inc.* (Early Site Permit for Grand Gulf ESP Site), LPB-04-19 (*SERI*) provides no support for the proposition that where as here the expert has a basis from his own experience to support the statements he has made, that the statements are not supportive of the basis and contention, particularly

where as here the expert explains how the hazardous post-accident condition can occur and what its impact could be on the public health and safety. Since DPS knows that the allowable leakage rates have been exceeded frequently in containment isolation valve tests at VY, it is telling that the Staff, that is equally aware of this fact, would choose to question the veracity of a statement which it knows is true.

Applicant rejects the SSE concern by arguing that because the seismic standards referenced by the Vermont State Geologist have not been adopted in Vermont, they are irrelevant to the SSE issue. DPS has relied upon both the IBC standards and the existence of more stringent seismic standards at newer nuclear facilities in New England. These higher standards are proof that if current standards are used higher peak ground accelerations will have to be used and VY has not evaluated its plant in light of those higher criteria. Applicant does not dispute those facts and only disputes whether the more stringent standards should be applied. Since DPS has explained, without contradiction, the linkage between SSE and maintaining containment pressure following an earthquake in conjunction with a LOCA and has explained the severe consequences which could occur in the event that an earthquake and LOCA occur concurrently, and the plant needed containment overpressure to meet NPSH requirements but the plant had not demonstrated that containment integrity could withstand the earthquake, DPS has met its obligation with regard to this contention. At most, Applicant demonstrates there would be a dispute about what more stringent earthquake standards should be applied.

**Fourth Contention**

**The Change in Design Basis to Use the Reactor Containment as an Engineered Safety Feature to Guarantee at Least a Minimum Pressure for ECCS Pump Performance Violates the Lessons-Learned Regarding Human Factors for Operators in the Three Mile Island Event and Creates Contrary and Confusing Operating Requirements That Will Create a Significant Hazard (10 C.F.R. §50.92) and Will Not Provide Adequate Protection for the Public Health and Safety as Required by 10 C.F.R. §50.57(a)(3).**

Neither Answer questions whether this Contention, as written, is sufficiently specific. Nor do the Answers challenge the basic factual allegations and supporting documentation. Taking credit for maintaining a certain amount of containment overpressure will unacceptably confuse operators, particularly if the EOP does not provide very specific guidance on how to balance the competing needs of keeping containment pressure low to reduce radiation releases and keep containment pressure high to assure adequate NPSH. Since the operators will be confused by having to both reduce and maintain containment pressure, and the Applicant's EOP creates an unacceptable human factors paradigm by not providing specific guidance to the operators, the concerns for human factors arising out of TMI is not addressed.

The Staff Answer employs NRC RAI SPSB-C-22<sup>16</sup> to claim that no genuine dispute exists. The Staff uncritically<sup>17</sup> relies on the Applicant's RAI response that states no changes to EOPs are

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<sup>16</sup> DPS provided this RAI Response as DPS Exhibit 29.

<sup>17</sup> We note that the Applicant did not similarly rely on the response to RAI SPSB-C-22.

involved in the licensing basis change request. Thus, the basis for the Staff answer is that because Applicant says no EOP changes are required, it must follow that none are needed. This kind of blind acceptance of an Applicant's unsupported assertion does not live up to the Staff's high standards for independence and critical analysis of licensing proposals. In fact, the Staff's statements go to prove DPS's contention since they confirm that no changes have been made in the EOP to accommodate the special problems created by having to rely on containment overpressure to meet NPSH requirements in emergencies,<sup>18</sup> the very emergencies for which the EOPs are provided.

The DPS Petition and the Staff Answer make clear that Applicant does not intend to make any changes to current EOPs. Petition, Exhibit 29. Since current EOPs do not now take credit for containment overpressure, this means Applicant does not intend to identify this new design basis for operators who would use these EOPs to combat emergencies. Applicant would have us believe that there are two different plants - the one that is licensed, and the one that is operated - unconnected and not communicating with each other<sup>19</sup>, and further that this situation is acceptable. DPS does not believe this is acceptable and clearly states why. Petition at 38, ¶ 7. DPS believes it is unacceptable to establish a design basis which relies on maintaining a certain amount of containment pressure during emergencies, and then not telling the operators to maintain that pressure in the operating procedures for

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<sup>18</sup> Technically, station blackouts and fires are "transients" rather than "emergencies." Applicant implies it does not intend to modify those transient procedures either. App. Ans. at 36.

<sup>19</sup> Applicant says as much in its Answer at 35, where it states that operators do not perform actions based on calculations but rather on approved operating procedures. Applicant's statement turns logic on its head. Approved operating procedures must reflect calculations, i.e., its design basis.

emergencies. Whether this practice is acceptable or not is a genuine dispute on a material issue of fact<sup>20</sup>.

Furthermore, if EOPs were revised to require operators to maintain the credited amount of overpressure, the requirement scheme would be so complicated as to confuse operators. Petition at 35, ¶ 3. DPS described how this confusion could result in incorrect operator actions, and therefore created the kind of human factor problem described in reviews of Three Mile Island<sup>21</sup>. Petition at 36, ¶ 4. Whether confusion is created leading to an inappropriate human factors problem is a genuine dispute over a material issue of fact. If, through confusion, the operator does not maintain sufficient containment overpressure, it is possible ECCS and containment heat removal pumps will fail or run at degraded flow conditions such that the requirements of 10 C.F.R. §50.46 would not be met and a significant hazard would be created (10 C.F.R. §50.92) through insufficient flow causing a significant increase in the probability or consequences of an accident previously evaluated.

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<sup>20</sup> DPS believes that the Applicant will not defend its response to RAI SPSB-C-22. This is more than mere speculation and is based on participation in the August 2004, NRC independent inspection (see Petition at 48). DPS is in the unique position of having participated in the inspection but not being able to speak publically about its results until after the NRC inspection report is issued (see Exhibit 35). DPS intends to augment this argument following the issuance of the NRC inspection report. If the Applicant now intends to amend the EOP and does not defend its response in RAI SPSB-C-22, it should have disclosed this information in its Answer rather than hold back that information for some perceived strategic advantage. Once again Applicant's conduct in responding to the Petition raises serious questions about its credibility in providing discovery and offering testimony further illustrating the necessity for a subpart G hearing with discovery and cross examination rights.

<sup>21</sup> Applicant's argument, Ans. at 34-35 is totally off point. Nowhere does DPS claim that TMI findings have not been resolved, but rather that Applicant's proposal creates a new human factors problem of type identified in the TMI findings.

Finally, Applicant claims this Contention lacks factual basis. However, a careful analysis of Applicant's response to RAI SPSB-C-22, Petition at 37-38, provides ample proof of the problem. The RAI response notes that containment sprays automatically isolate at 2.5 psig (RAI Response, para. 6), despite overpressure credits ranging from 1.3 psig to 6.1 psig. Thus, the operator is supposed to terminate containment sprays before containment pressure reaches 2.5 psig in order to meet NPSH needs. However, the only direction on EOP-3 which even suggests the operator should terminate containment sprays early is an ambiguous Note 5, which states: *Reducing primary containment pressure will reduce the available NPSH for pumps taking suction from the torus.* RAI Response, Para. 5. The note does not direct operators to maintain any particular level of containment pressure. The EOPs provide curves which identify pump NPSH limits as a function of pump flow, torus water temperature and suppression chamber pressure. RAI Response, Para. 3. The stated manner in which operators control the NPSH for RHR and CS pumps is to maintain pump flow below NPSH limits (rather than to maintain containment pressure). RAI Response, Para. 4.

The RAI response documents the potential confusion. It provides evidence of the factual validity of the Contention. Operators are directed to reduce pump flow to control NPSH, not to maintain containment pressure, as Applicant requests for its design basis. The likely outcome of following the requirements of the EOPs, as stated in the RAI Response, is that containment pressure would be reduced to 2.5 psig, the automatic setpoint for containment spray, and then pump flow would be reduced to maintain sufficient NPSH. If the design basis conditions for torus temperature occurred, this

would result in pump flows less than credited ~~Flow Contention~~ analyses.

**To the Extent Applicant Is Claiming That Use of Containment Overpressure as a Credit to Meet NPSH Is Necessary and Failure to Use it Is Impracticable Because of Economic or Need for Power Considerations, its Request Should Be Rejected as Contrary to the Atomic Energy Act (42 U.S.C. §2232).**

If, as Applicant and the Staff assert in their unsworn Answers, no effort will be made in this proceeding to justify the use of containment overpressure on the basis of economic or need for power considerations, then this Contention is moot. Once that assertion is turned into a stipulation, the Contention will be withdrawn.

It is significant that while arguing against the Contention, both Answers actually support it. Both Answers correctly observe that neither economic nor need for power considerations have any place in evaluating the proposed uprate amendment. Both agree that the only standard by which the application should be evaluated is whether allowing the proposed uprate will provide adequate protection for the public health and safety and otherwise meet the safety requirements of the AEA and the NRC regulations. In short, Applicant and the Staff agree that Applicant may not legally justify its proposed uprate by pointing to any economic considerations or need for power as the justification. Thus, they also agree that using containment overpressure to meet NPSH requirements rather than merely reducing the proposed uprate level or modifying plant equipment, as discussed above, cannot be justified because those options are financially or otherwise unattractive. If the use of containment overpressure will fail to provide the level of safety required by statute and/or regulation, its use must be rejected and the

proposed uprate denied.

**B. DPS Is Entitled to a Hearing under Subpart G  
with Regard to its Admitted Contentions**

**1. Introduction**

Applicant and the Staff, relying on the Statement of Considerations which accompanied the adoption of the current version of Part 2, not on the actual language of the Regulations (10 CFR §§2.309(g) and 2.310(d)), assert that the only basis upon which a Subpart G hearing may be held is if there is dispute of fact regarding a past event *and* there is an issue of the credibility of an eyewitness to the event or the motive or intent of a witness is at issue. The language of the Statement of Considerations upon which they rely is inconsistent with the actual wording of the §§2.309(g) and 2.310(d) and must be rejected for that reason. Both Regulatory provisions emphasize that the proper test for determining whether the procedures of Subpart G, particularly the right to cross-examination, should apply is whether petition demonstrates that the best way to resolve material issues of fact which are in dispute is by cross-examination. While credibility of witnesses may be one of the reasons why cross-examination is warranted, it is certainly not the only one. For example, there are numerous questions which DPS will ask of the witnesses for Applicant, not to see if they are being less than truthful, but to ascertain the underlying bases for the positions they are taking, the extent to which they rely on certain information, the reasons why they credit certain evidence and reject other evidence and to expose, if applicable, the weaknesses in the reasoning or evidence upon which they base their opinion. No amount of pre-filed testimony will get to these issues because that testimony, carefully crafted with

the assistance of counsel, will not disclose the weaknesses in the reasoning or evidence relied upon or expose the inability of the witness to adequately answer difficult questions. Applicant and the Staff argue for a “crabbed” interpretation of the basis for cross-examination when they limit it to cases of witness credibility or intentions.

The position urged by Applicant and the Staff is also inconsistent with the official position taken by the NRC in its Brief for the Federal Respondents filed on July 14, 2004 (NRC Brief)(Exhibit 37 to this Reply), in *Citizens Awareness Network v. U.S. Nuclear Regulatory Commission*, Docket Nos. 04-1145 and 04-1395 (United States Court of Appeals for the First Circuit) (*CAN v. NRC*). The NRC representations to the Court, like the language of the regulations, is that factual disputes, regardless of whether the credibility of eyewitnesses are at issue, may form the basis for a right to cross-examine witnesses.

**2. The Plain Language of the Regulations Authorizes  
Subpart G Hearings When Factual Disputes Can  
Best Be Resolved By Use of Cross-Examination**

In §2.309(g) the requirements of §2.310(d) are explained as follows:

the . . . petition must demonstrate by reference to the contention and the bases provided and the specific procedures in subpart G of this part, that resolution of the contention necessitates resolution of material issues of fact which may be best determined through the use of the identified procedures.

Thus the emphasis is on the existence of a factual dispute and a showing that the procedures of Subpart G, in this case, cross-examination, may best lead to resolution of that dispute. In §2.310(d) the standard

is stated as follows:

. . . [hearing for resolution of the contention will be conducted under Subpart G] where the presiding officer by order finds that resolution of the contention or contested matter necessitates resolution of issues of material fact relating to the occurrence of a past activity, where the credibility of an eyewitness may reasonably be expected to be at issue, and/or issues of motive or intent of the party or eyewitness material to the resolution of the contested matter . . .

10 CFR 2.310(d). Each clause stands alone and the Regulation does not combine the first two clauses into one clause as is done in the Statement of Consideration. Rather, as in §2.309(g), at least one of the tests for application of Subpart G is whether there is a factual dispute the resolution of which will be best accomplished by use of cross-examination.

It is well-accepted law that where a statute, or in this case a regulation, is clear and unambiguous, reference to secondary sources, including legislative history or statements of consideration is not warranted.<sup>22</sup> See *Chevron U.S.A. v. Shimer*, 467 U.S. 837, 842-43, 104 S.Ct. 2778, 2781-82 (1961); *APWU, AFL-CIO v. Potter*, 343 F. 3d 619, 626 (2d. Cir. 2003).

**3. NRC Has Confirmed That Cross-Examination  
Is Available When Factual Disputes Can Best Be  
Resolved By Use of Cross-Examination**

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<sup>22</sup>The Supreme Court has also made clear that courts must defer to an agency's *consistent* interpretation of its own regulation unless it is "plainly erroneous or inconsistent with the regulation." *Bowles v. Seminole Rock and Sand Co.*, 325 U.S. 410, 414, 65 S.Ct. 1215, 1217, 89 L.Ed. 1700 (1945). In this instance the NRC is not consistent in its interpretation of the regulations as evidenced by the differences in the NRC Staff brief before us in this docket, and the NRC statements in its brief in *CAN v. NRC*. Moreover, the NRC Staff interpretation of the regulation is plainly erroneous under the traditional statutory construction rules.

If the Board determines the Regulations are ambiguous and resort to the Statement of Consideration is justified, to the extent there is a conflict between the Regulations and the Statement of Considerations, the best evidence for resolution of the conflict is subsequent authoritative statements on the meaning of the Regulations expressed by the Commission itself. Such an authoritative interpretation of Part 2 is provided by the brief of the NRC as Respondent in *CAN v. NRC*. The case involves a challenge to the new Part 2 regulations, particularly Subpart L. In responding to that challenge, the NRC has devoted considerable effort to describe for the Court the meaning of the Regulations as they relate to when cross-examination is allowed. In its brief the NRC unequivocally asserts that the right to cross-examination in a Subpart L hearing is the same as the right preserved by the Administrative Procedure Act (5 U.S.C. 556(d)) for an "on the record hearing". In particular, the NRC states:

In any case, the core of the new Part 2, Subpart L, meets, and in some respects exceeds, the APA's "on-the-record" requirements.

\* \* \*

In particular, the new Subpart L permits such cross-examination as is "necessary to ensure development of an adequate record for decision." 10 C.F.R. 2.1204(b). This is equivalent to the APA's provision for such cross-examination "as may be required for a full and true disclosure of the facts." 5 U.S.C. 556(d).

\* \* \*

The NRC's Subpart L, though using somewhat different language, provides as much access to cross-examination as the APA. Subpart L allows cross-examination where "necessary to ensure the development of an adequate record for decision." 10 C.F.R. 2.1204(b)(3). As the preamble to the final rule makes clear, the NRC intended that language to be the equivalent of the APA's. 69 FR 2188, 2191, 2195-96. The difference in language can be read simply as the NRC's elaboration on what in fact the APA standard means in actual adjudication.

Public Citizen claims that Part 2 “eliminates” any cross-examination of experts. Brief 3. This is untrue. Public Citizen cites a statement in the preamble to the final rule that the Commission believes cross-examination “does not appear to be either necessary or useful in circumstances where, for example, the dispute falls on the interpretation of or inferences arising from otherwise undisputed facts.” Public Citizen’s Brief 36-37, *citing* 69 FR 2196. But the Commission goes on to say that the presiding officer is best able to assess the record as the hearing progresses, and to determine whether cross-examination is needed to develop an adequate record. *Id.*

NRC Brief at 18-19, 45-46.

Thus, the NRC has represented to the First Circuit that the touchstone to cross-examine is not, as Applicant and the Staff assert, only if factual disputes involve the credibility or intent of the witnesses, but that such cross-examination is allowed “as may be required for a full and true disclosure of the facts”, quoting from 5 U.S.C. §556(d) and equating the language of Subpart L with that language. NRC Brief at 19. The NRC counters an argument based on its Statement of Considerations that it prohibits cross-examination of experts because their testimony is technical and cross-examination is unnecessary, by rejecting such a narrow view of the bases for cross-examination and assuring the Court “the presiding officer is best able to assess the record as the hearing progresses, and to determine whether cross-examination is needed to develop an adequate record”. *Id.* at 46.

This authoritative interpretation of the standard to be used in deciding when to allow cross-examination is fully consistent with the actual language of the Regulations relating to when Subpart G hearings are to be held and confirm that what the NRC intended to accomplish with Part 2 is what they

have stated in the language of the Regulations, not the language of the Statement of Consideration. It would make no sense to find that while addressing the same issue - i.e. when cross-examination is to be allowed - the NRC would establish a different test under Subpart L than for when its use is warranted to justify use of Subpart G. Of course, even though cross-examination may be allowed under Subpart G, that does not mean that its use is without restraints. The presiding officer retains the right to restrict cross-examination under §2.711(c) such that it will not be misused or unnecessarily prolong the hearing.

Viewed in its entirety, the regulatory scheme provides a Subpart G hearing in those licensing proceedings where the petitioner is able, at this early stage, to demonstrate that Subpart G procedures, primarily cross-examination, will provide the best way to resolve an identified factual dispute. In those cases where the petitioner is unable to advance that argument at such an early stage in the process, Subpart L is available and the right to cross-examination is granted if and when such a showing can be made. DPS has demonstrated that cross-examination will best resolve the factual disputes raised by its contentions and, pursuant to the plain wording of the Regulations, is entitled to have a Subpart G hearing to resolve those disputes.

#### **4. DPS Meets The Standard For A Subpart G Hearing**

DPS has, in its initial Petition and this Reply, provided ample evidence that a Subpart G hearing is required, even if the narrow reading of the standards urged by Applicant and the Staff were applied. As noted at several points in the preceding discussion, the Answer filed by Applicant uses tactics designed to conceal, not reveal, facts relevant to the issues in this proceeding. Given the chance to be

forthcoming about information of which it was aware, Applicant chose instead to seek to score points by alleging that DPS, relying on the expert opinion and personal observations of the Vermont State nuclear engineer, had failed to provide supporting evidence on several issues. In these instances, as noted above, documents existed of which Applicant was aware that confirmed the opinion and statement offered by Mr. Sherman. Essentially, Applicant misrepresented the facts by asserting that Mr. Sherman's opinion was without support when Applicant knew there was evidence to support that opinion and apparently hoped Mr. Sherman would not be aware of such evidence or could not find it. Since §2.336 (a)(2) requires a party to disclose all documents that "are relevant to the contentions", Applicant's conduct strongly suggests that it will not rigorously obey that obligation. Similarly, when Applicant's attorneys work with its witnesses to prepare their testimony, there is no reason to believe the testimony will voluntarily disclose negative information of which they are aware that undercuts the position they are taking or even that they will fully respond to all the opinions raised by DPS if they believe a less revealing tactic will carry the day without having to deal with the merits of documents and information of which the witness is aware. Only with cross-examination and formal discovery (including motions to compel), supported by depositions, can DPS or the Board be confident that there will be a "full and true disclosure of the facts". 5 U.S.C. §556 (d) (emphasis added).

Even if the disclosures made and testimony offered are candid, the nature of the issues involved in this proceeding, relying ultimately on engineering judgment, cannot be adequately explored without cross-examination. Written testimony is limited by the constraints of the written word and the

opportunity for confusion regarding the words used. For example if a witness testifies that it is conservative to use the assumptions for calculating NPSH following a LOCA which appear in Regulatory Guide 1.82, Rev. 3, even though the underlying experimental bases for those assumptions have been unable, in many instances (identified above) been unable to bound or otherwise quantify the uncertainties, only carefully crafted cross-examination will be able to test the bases and reasoning of the witness against the specific experimental studies to understand whether the witness's reasoning and basis stand up. Whether that is a matter of credibility of the witness - i.e. is the position taken credible - or merely a test of the strength of the reasoning and bases offered, it is step which will have to occur on many occasions. Another example is the EOP and its failure to deal with human factors concerns. Applicant will assert that its EOP as written is sufficient to prevent confusion of its operators in the event of an accident and a witness will so testify. The best way for the Board to judge that is to have the witness, while on the stand - something akin to, but much less tense than, a real accident situation - be confronted by and respond to real life hypothetical regarding the problem of maintaining containment pressure at the various levels required for NPSH while also reducing containment pressure as otherwise required in the EOP. These are but two examples of instances where the best way to get at the matters in dispute is to cross-examine the witnesses. Any concern that the cross-examination or discovery will be used improperly can be addressed by the use of the procedures in Subpart G which are established for just that purpose. Certainly at this stage of the proceeding there is no basis, and Applicant has not suggested one, to believe DPS will abuse the discovery or cross-examination process. The decision on

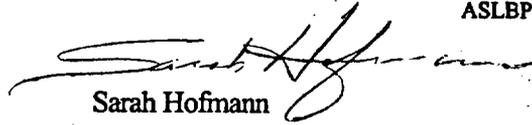
whether to use Subpart G procedures should not consider such factors, which may have generically underlay the Regulatory decision to create the Subpart L process for licensing amendments, but have no case specific basis in this proceeding.

Finally, as is evident from the filings by DPS and Applicant and the Staff, there are numerous complex, substantive issues involved in the proposed uprate and numerous areas of substantial disagreement about the meaning of past events - test conducted, opinions offered by others, filings made reporting on plant conditions, etc. - which disagreements are supported by reference to many complex documents the meaning and significance of which will be the topic of varying opinions from qualified experts. There is no feasible way in which a hearing without cross-examination and discovery will be able to sort out these issues effectively and efficiently. Cross-examination, by the parties and the Board, will most effectively and most quickly get to the bottom of the disagreements, expose the central issue or issues on which disagreements exist and allow the Board to resolve the dispute on the basis of a full and complete record.

### CONCLUSION

For all the reasons stated here and provided in the initial Petition DPS urges the Board to admit the Contentions and grant DPS a Subpart G hearing to resolve the genuine dispute that exists between it and the Applicant regarding the facts and opinions which are at issue.

Respectfully submitted,



Sarah Hofmann  
Special Counsel  
Department of Public Service  
112 State Street - Drawer 20  
Montpelier, VT 05620-2601

Anthony Z. Roisman  
National Legal Scholars Law Firm  
84 East Thetford Rd.  
Lyme, NH 03768

Dated this 7<sup>th</sup> day of October, 2002 at Montpelier, Vermont.

**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

**In Re: Entergy Nuclear Vermont Yankee )  
LLC and Entergy Nuclear )  
Operations, Inc. )**

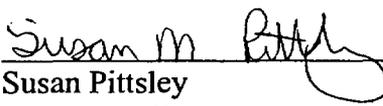
**Docket No. 50-271  
(Extended Power Uprate)**

**AFFIDAVIT OF WILLIAM K. SHERMAN**

1. My name is William K. Sherman. I am employed by the Vermont Public Service Department ("Department") in the position of State Nuclear Engineer. I have held this position since November, 1988. My duties include ongoing State regulatory oversight of the Vermont Yankee Nuclear Power Station ("Vermont Yankee"), as well as advising the Department and other State agencies on issues related to Vermont Yankee and nuclear power. I previously submitted my resume with the Department's Notice of Intention to Participate and Petition to Intervene filed on August 30, 2004.
  
2. I assisted in the preparation of the Department's Reply to the NRC Staff Answer and Entergy Answer to the Department's Notice of Intention to Participate and Petition to Intervene.
  
3. All of the technical information contained in the Department's Reply is true and correct to the best of my knowledge.

  
\_\_\_\_\_  
William K. Sherman  
State Nuclear Engineer

Subscribed and sworn to before me this 6th day of October, 2004.

  
\_\_\_\_\_  
Susan Pittsley  
Notary Public  
My commission expires February 10, 2007

**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

<b>In Re: Entergy Nuclear Vermont Yankee )</b>	
<b>LLC and Entergy Nuclear )</b>	<b>Docket No. 50-271</b>
<b>Operations, Inc. )</b>	
<b>(Extended Power Uprate at )</b>	<b>ASLBP No. 04-832-02-OLA</b>
<b>Vermont Yankee) )</b>	

**EXHIBIT LIST TO  
VERMONT DEPARTMENT OF PUBLIC SERVICE  
REPLY TO ANSWERS OF APPLICANT AND NRC STAFF TO  
NOTICE OF INTENTION TO PARTICIPATE AND PETITION TO INTERVENE**

- Exhibit 30: *BWR ECCS Strainer Blockage Issue: Summary of Research and Resolution Actions, LA-UR-01-1595, D.V.Rao, et al., March 21, 2001*
- Exhibit 31: *Knowledge Base for the Effect of Debris on Pressurized Water Reactor Emergency Core Cooling Sump Performance, NUREG/CR-6808, LA-UR-03-0880, February 2003.*
- Exhibit 32: *CR-VTY-2004-0918, Adverse Trend Common Cause Analysis Report, MSIV As-Found LLRTs Show an Adverse Trend, Vermont Yankee, May 5, 2004.*
- Exhibit 33: *Pages A-66 and A-67 (Pinch Point Summary - Torus Water Temp/ECCS Pump NPSH) from Vermont Yankee Nuclear Power Station Extended Power Uprate Feasibility Study, June 28, 2002.*
- Exhibit 34: *Memorandum of Understanding on Cooperation, Notification, and Access Between Entergy Nuclear Vermont Yankee LLC and Vermont Department of Public Service for the Vermont Yankee Nuclear Power Station, July 30, 2002.*
- Exhibit 35: *Guidance for Interim Implementation of NRC Policy on Cooperation with States - State Observation of NRC Inspections, Signature by William K. Sherman, January 1, 1990. (Please note this is a retype of the original document which is illegible.*
- Exhibit 36: *Vermont Yankee letter of November 12, 1998, Response to Generic Letter 98-04.*
- Exhibit 37: *Brief for the Federal Respondents filed on July 14, 2004 in Citizens Awareness Network v. U.S. Nuclear Regulatory Commission, Docket Nos. 04-1145 and 04-1395 (United States Court of Appeals for the First Circuit) (CAN v. NRC).*

LA-UR-01-1595

## **BWR ECCS STRAINER BLOCKAGE ISSUE: SUMMARY OF RESEARCH AND RESOLUTION ACTIONS**

**Prepared By:**

D. V. Rao, Clinton J. Shaffer, and Robert Elliott

**Los Alamos National Laboratory**  
Probabilistic Risk and Hazard Analysis Group  
Technology and Safety Assessment Division  
Los Alamos, NM 87545

**Prepared For:**

**US Nuclear Regulatory Commission**  
Office of Nuclear Reactor Regulation  
11555 Rockville Pike  
Rockville, Maryland

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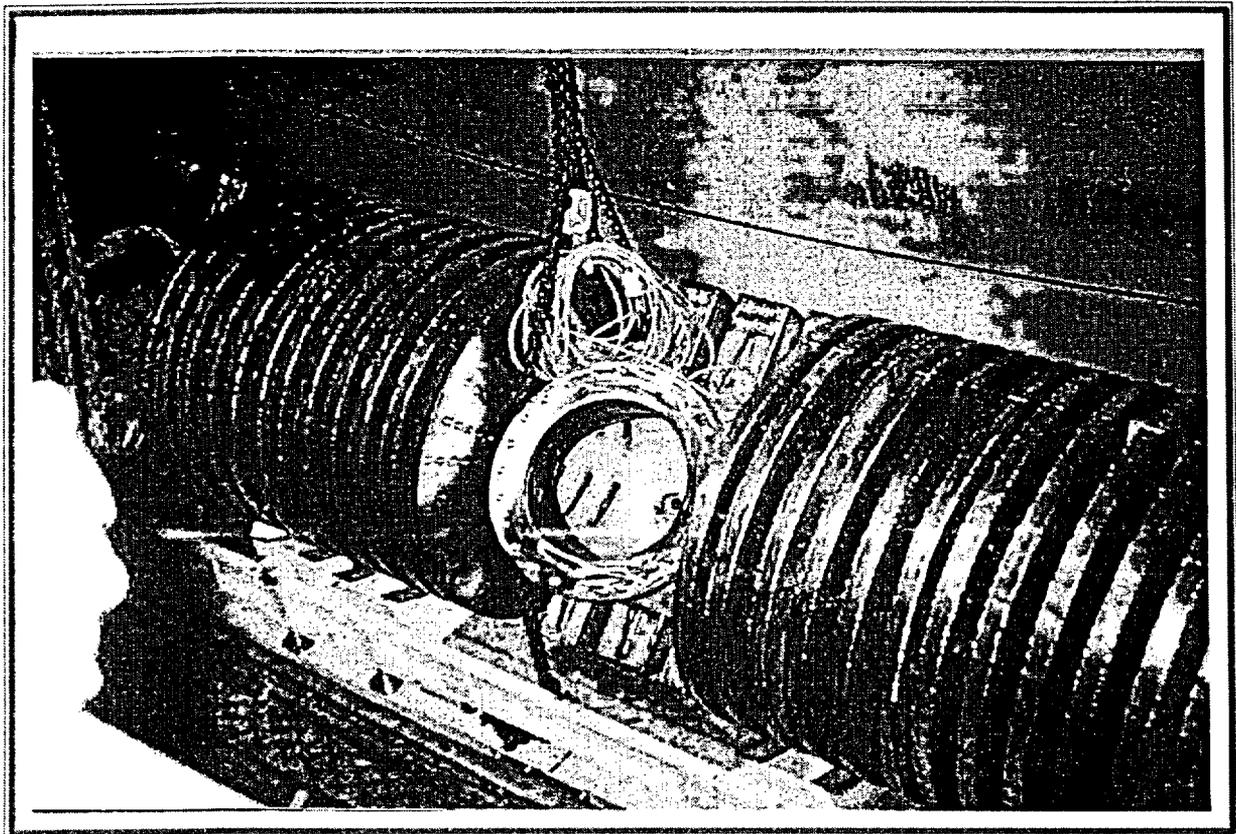
# **BWR ECCS STRAINER BLOCKAGE ISSUE: SUMMARY OF RESEARCH AND RESOLUTION ACTIONS**

Prepared by

**D. V. Rao**  
D-11, Los Alamos National Laboratory

**Clinton J. Shaffer**  
ARES Corporation

**Robert Elliott**  
Office of Nuclear Reactor Regulation  
US Nuclear Regulatory Commission



## Abstract

### ABSTRACT

The research and technical review efforts that form the basis for the resolution of the BWR strainer blockage issue by the United States Nuclear Regulatory Commission are summarized here. If a loss-of-coolant accident (LOCA) were to occur in a boiling-water reactor (BWR), insulation would be destroyed in a region close to the break. This insulation debris would be carried away from the break region by high-velocity break flow. Some portion of the entrained debris, in addition to other sources of debris, would be transported to the suppression pool and then subsequently deposited onto ECCS suction strainers where the debris would resist ECCS water flow. If sufficient debris were deposited onto the strainers, the head loss across the debris bed could compromise the operation of the ECCS by reducing flow below the minimum required to mitigate the accident or by completely blocking flow. Operational events demonstrated the need to address this concern for all BWR plants. The issue was initially studied during the review of unresolved safety issue (USI) A-43 in January 1979 and was considered resolved in 1985. However, subsequent ECCS strainer clogging and other events involving foreign material problems prompted a review of the strainer blockage issue. The events demonstrated that certain strainer clogging phenomena had not previously been recognized by the Nuclear Regulatory Commission (NRC) staff or the industry. The NRC sponsored research to evaluate the effectiveness of existing suction strainer designs in domestic BWR plants. The key technical findings from this research are summarized in this report. In addition, a summary of the actions taken by the nuclear power industry to ensure availability of long-term recirculation of cooling water in BWR plants is included.

On May 6, 1996, the NRC issued NRC Bulletin 96-03 "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors." In the bulletin, the staff concluded that the strainer blockage issue must be resolved by licensees in order to ensure compliance with the regulations. All BWR licensees were requested to implement appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA. The industry resolved the strainer blockage issue on a plant-specific basis by installing large-capacity passive strainers in each plant utilizing strainer design guidance provided by the BWR Owners Group (BWROG). The staff reviewed the BWROG guidance and performed detailed reviews of several plants. The results of the staff's review are also summarized here.

## TABLE OF CONTENTS

ABSTRACT.....	i
CONTENTS.....	ii
LIST OF ACRONYMS.....	vi
EXECUTIVE SUMMARY.....	viii
1.0 OVERVIEW OF BWR STRAINER BLOCKAGE ISSUE AND RESOLUTION.....	1-1
1.1 Historical Overview .....	1-1
1.1.1 Overview of USI A-43 Resolution .....	1-4
1.1.2 Overview of Subsequent BWR Strainer Clogging and Pump Failure Events.....	1-6
1.1.3 Overview of NRC Research, Regulatory Actions, and the BWR Issue Resolution.....	1-9
1.2 Regulatory Considerations .....	1-16
1.2.1 Code of Federal Regulations .....	1-16
1.2.2 Regulatory Guidance.....	1-18
1.3 Related International Experience.....	1-19
1.4 Risk Significance of Strainer Blockage.....	1-20
1.5 References.....	1-22
2.0 NRC SPONSORED RESEARCH.....	2-1
2.1 NRC Sponsored Testing .....	2-1
2.1.1 Fibrous Debris Testing.....	2-1
2.1.1.1 Fiber Bed Filtration and Head Loss Tests.....	2-1
2.1.1.2 Fibrous Debris Suppression Pool Sedimentation Tests.....	2-5
2.1.1.3 Separate Effects Fibrous Insulation Debris Transport/Capture Tests.....	2-9
2.1.1.4 Integrated Effects Fibrous Insulation Debris Transport/Capture Tests.....	2-12
2.1.1.5 Fibrous Insulation Debris Washdown/Erosion Tests.....	2-18
2.1.2 RMI Debris Testing.....	2-22
2.1.2.1 RMI Debris Generation Tests.....	2-22
2.1.2.2 RMI Suppression Pool Sedimentation Tests .....	2-24
2.1.2.3 RMI Head Loss Tests.....	2-26
2.2 NRC Analytical Developments.....	2-28
2.2.1 Reference Plant Evaluation.....	2-29
2.2.2 BLOCKAGE Computer Code.....	2-35
2.2.3 Drywell Debris Transport Study (DDTS).....	2-37
2.2.3.1 Phenomena Identification and Ranking Table (PIRT).....	2-37
2.2.3.2 Transport Analysis Methodology.....	2-39
2.2.3.3 Controlling Phenomena and Plant Features.....	2-42
2.2.3.4 Specific Analytical Studies.....	2-43
2.2.3.5 Debris Transport Quantification Results.....	2-45
2.2.4 Reliance on Containment Overpressure Credit.....	2-47
2.2.4.1 Summary GL-97-04 Submittals .....	2-47
2.2.4.2 Technical Assessment.....	2-48
2.3 References.....	2-49

3.0 NRC REVIEW OF INDUSTRY AND INTERNATIONAL SPONSORED RESEARCH.....	3-1
3.1 NRC Compilations and Analysis of US Industry Data .....	3-1
3.1.1 Susquehanna Blockage & Transport Tests.....	3-1
3.1.2 BWROG Head Loss Tests.....	3-6
3.1.3 GE Stacked Disk Strainer Testing.....	3-9
3.1.4 PCI Stacked Disk Strainer Testing.....	3-11
3.1.5 NRC Adaptation of the NUREG/CR-6224 Correlation to PCI Stacked-Disk Strainers.....	3-13
3.1.6 Mark III Quarter-Scale Testing.....	3-14
3.1.7 LaSalle Tests.....	3-17
3.2 NRC Compilations and Analysis of International Test Data.....	3-18
3.2.1 Finnish RMI Testing.....	3-19
3.2.2 Vattenfall Mineral Wool Testing.....	3-20
3.3 References.....	3-21
4.0 RESOLUTION METHODOLOGY (URG and NRC Review of URG).....	4-1
4.1 Evaluation of URG Resolution Options.....	4-2
4.2 Debris Sources.....	4-4
4.2.1 LOCA Generated Insulation Debris... ..	4-4
4.2.1.1 Pipe Break Selection.....	4-4
4.2.1.2 Zone of Influence (ZOI).....	4-6
4.2.2 Drywell Debris Sources Other Than Insulation Debris... ..	4-8
4.2.3 Suppression Pool Debris.....	4-9
4.3 Transport of Debris.....	4-10
4.3.1 Drywell Debris Transport.....	4-10
4.3.2 Suppression Pool Debris Transport.....	4-14
4.4 Strainer Head Loss.....	4-15
4.5 Available Net Positive Suction Head (NPSH).....	4-17
4.6 References.....	4-18
5.0 INDUSTRY IMPLEMENTATION.....	5-1
5.1 Replacement Strainers Designs.....	5-2
5.2 Overview of Industry Implementation.....	5-5
5.2.1 NRC Review of Plant Specific Submittals.....	5-6
5.2.2 Onsite Plant Audits.....	5-7
5.2.2.1 Limerick Plant Audit Summary.....	5-9
5.2.2.2 Dresden Plant Audit Summary .....	5-10
5.2.2.3 Duane Arnold Audit Summary .....	5-12
5.2.2.4 Grand Gulf Plant Audit Summary.....	5-14
5.3 Outstanding Issues.....	5-15
5.3.1 Head Losses for Mixed Fiber and RMI Debris Beds .....	5-15
5.3.2 Long-Term Head Losses.....	5-16
5.4 References.....	5-17

## LIST OF FIGURES

Figure 2-1 Flow Loop of Head Loss Test Apparatus .....	2-3
Figure 2-2 Typical Transient Head Loss for a Pure Fiber Bed.....	2-4
Figure 2-3 Suppression Pool Sedimentation Test Apparatus .....	2-6
Figure 2-4 Fibrous Debris Classifications .....	2-8
Figure 2-5 Fibrous Debris Terminal Settling Velocities .....	2-9
Figure 2-6 Separate Effects Insulation Debris transport/Capture Test Apparatus .....	2-10
Figure 2-7 Typical Debris Capture by a Wetted Pipe .....	2-12
Figure 2-8 CEESI Air Jet Test Facility .....	2-14
Figure 2-9 Samples of Debris Generated in the CEESI Tests .....	2-16
Figure 2-10 Typical Debris on a Grating in CEESI Tests.....	2-16
Figure 2-11 Capture of Small Debris by Grating .....	2-17
Figure 2-12 Schematic of Washdown Test Apparatus.....	2-19
Figure 2-13 Time-Dependency of 1-inch Insulation Blanket Material Under Break Flow Conditions .....	2-21
Figure 2-14 Typical Conditions of Debris After Exposure to Water.....	2-22
Figure 2-15 Size Distribution of DEGB Generated RMI Debris .....	2-23
Figure 2-16 Typical RMI Debris Generated by Large Pipe Break.....	2-24
Figure 2-17 Typical Large (6") RMI Debris in Suspension During Chugging .....	2-25
Figure 2-18 Effect of RMI Debris on Head Loss When Mixed with Fibrous Debris .....	2-27
Figure 2-19 Typical RMI/NUKON/Sludge Post-Test Debris Cake .....	2-28
Figure 2-20 Schematic Illustration of the Debris Generation Model.....	2-31
Figure 2-21 Simplified Event Tree for LLOCA at the Reference Plant .....	2-34
Figure 2-22 Typical Fibrous Debris Transport in the Suppression Pool .....	2-35
Figure 2-23 Schematic Illustrating the Complexity of Drywell Debris Transport.....	2-40
Figure 2-24 Sample Drywell Debris Transport Logic Chart .....	2-41
Figure 2-25 CFD Simulation of Mark I Flow Patterns .....	2-45
Figure 3-1 Comparison of NUREG/CR-6224 Correlation with PP & L Head Loss Data .....	3-4
Figure 3-2 Schematic Illustration of Debris Bed Buildup on Stacked-Disk Strainers.....	3-15
Figure 3-3 Strainer Effective Surface Area Correlated with Volume of Deposited.....	3-15
Figure 3-4 Annular Arrangement of Grand Gulf ECCS Strainer I Mark III Containment .....	3-16
Figure 4-1 Damage (Onset) Pressures for Various Insulation .....	4-7
Figure 5-1 PCI Stacked Disk Strainer Being Installed at Pilgrim Nuclear Power Plant.....	5-3
Figure 5-2 The Core Tube Used in the PCI Stacked Disk Strainers. Core tube provides Structural support and also makes the approach flow uniform .....	5-3
Figure 5-3 Individual Panel of Mark III Strainer Installed at Grand Gulf Nuclear Power Plant.....	5-4
Figure 5-4 Pictorial Illustration of the Mark III Strainer as Installed in the Suppression Pool .....	5-4
Figure 5-5 Example of Long Term Head Loss for a NUKON Debris Bed.....	5-17

## LIST OF TABLES

Table 1-1 BWR Strainer Blockage Issue Timeline .....	1-2
Table 1-2 Issue Resolution Summary for Audited Plants .....	1-15
Table 1-3 Impact of Recirculation Core Cooling on Typical Internal Event BWR CDFs.....	1-22
Table 1-4 Distribution of Expected Risk Associated When Recirculation Core Cooling is Unavailable .....	1-22
Table 2-1 Small Debris Capture Fractions .....	2-17
Table 2-2 Study Transport Fractions for Main Steam Line Breaks.....	2-46
Table 2-3 Study Transport Fractions for Recirculation Line Breaks.....	2-46
Table 2-4 Study Transport Fractions for All Insulation Located in ZOI .....	2-46
Table 3-1 Comparison of NUREG/CR-6224 Correlation with PP & L Head Loss Data .....	3-3
Table 3-2 Results of the CFD Simulation of the ARL PP & L Flume Tests.....	3-5
Table 3-3 Debris Behavior Based on Turbulence Levels.....	3-5
Table 4-1 Fractions of Blanket Material With Low Transport Efficiency.....	4-11
Table 4-2 URG Drywell Transport Fractions .....	4-12
Table 4-3 Combined Debris Generation and Transport Fractions for Mark I, III.....	4-13
Table 5-1 The Strainer Design Details of some of the Plants Reviewed by NRC.....	5-6
Table 5-2 Issue Resolution Summary for Audited Plants .....	5-8
Table 5-3 Geometric Details of the Limerick Strainers .....	5-10
Table 5-4 Geometric Details of Dresden Strainers.....	5-12
Table 5-5 Geometric Details of Duane Arnold Strainers .....	5-14

## LIST OF ACRONYMS

ACRS	Advisory Committee on Reactor Safeguards
AJIT	Air Jet Impact Testing
ARL	Alden Research Laboratory
ASTM	American Society for Testing Materials
AWTS	Anticipated Transient Without Scram
BTP	Branch Technical Position
BWR	Boiling Water Reactor
BWROG	Boiling Water Reactor Owners Group
CDF	Core Damage Frequency
CDI	Continuum Dynamics, Inc.
CEESI	Colorado Engineering Experiment Station Inc.
CFD	Computational Fluid Dynamics
CFR	Code of Federal Regulations
CSB	Containment Systems Branch
CSNI	Committee on the Safety of Nuclear Installations
CSS	Containment Spray System
CST	Condensate Storage Tank
DB	Design Basis
DBA	Design-Basis Accident
DDTS	Drywell Debris Transport Study
DEGB	Double-Ended Guillotine Break
DGM	Debris Generation Model
ECCS	Emergency Core Cooling System
EDO	Executive Director for Operations
EOP	Emergency Operating Procedure
EPRI	Electric Power Research Institute
FME	Foreign Material Exclusion
FSTF	Full-Scale Test Facility
GDC	General Design Criteria
GE	General Electric Company
GUI	Graphical User's Interface
HPCI	High-Pressure Coolant Injection
IPE	Individual Plant Examination
ISLOCA	Interfacing Systems LOCA
ITS	Innovative Technology Solutions, Inc.
LANL	Los Alamos National Laboratory
LTR	Licensing Topical Report
LLOCA	Large Loss-of-Coolant Accident
LOCA	Loss-of-Coolant Accident
LPCI	Low-Pressure Core Injection
LPCS	Low-Pressure Core Sprays
MLOCA	Medium Loss-of-Coolant Accident
MSLB	Main Steam Line Break
NDE	Non-Destructive Evaluation
NEA	Nuclear Energy Agency
NPSH	Net Positive Suction Head
NRC	Nuclear Regulatory Commission
NRCB	Nuclear Regulatory Commission Bulletin

## LIST OF ACRONYMS

OECD	Organization for Economic Cooperation and Development
ORNL	Oak Ridge National Laboratory
PCI	Performance Contracting Inc.
PIRT	Phenomena Identification and Ranking Table
PNPP	Perry Nuclear Power Plant
PP&L	Pennsylvania Power and Light Company
PRA	Probabilistic Risk Assessment
PWG-1	Principal Working Group 1
PWR	Pressurized Water Reactor
QA	Quality Assurance
RCIC	Reactor Core Injection Cooling
RG	Regulatory Guide
RHR	Residual Heat Removal
RLB	Recirculation Line Break
RMI	Reflective Metallic Insulation
SEA	Science and Engineering Associates
SEM	Scanning Electron Micrograph
SER	Safety Evaluation Report
SKI	Statens Kernkraftinspektion [Swedish Nuclear Power Inspectorate]
SNL	Sandia National Laboratories
SPCP	Suppression Pool Cleanliness Program
SRP	Standard Review Plan
SRV	Safety Relief Valve
TER	Technical Evaluation Report
URG	Utility Resolution Guidance
USI	Unresolved Safety Issue
USNRC	United States Nuclear Regulatory Commission
ZOI	Zone of Influence

# Executive Summary

## EXECUTIVE SUMMARY

A high-energy pipe break (referred to here as a loss-of-coolant accident or LOCA) in a boiling water reactor (BWR) would destroy pipe insulation (fibrous, metallic, etc.) in the vicinity of the break, creating insulation debris. The area near the break where insulation debris is generated is called the zone-of-influence (ZOI). This debris would be driven away from the ZOI by high-velocity steam flow, in the case of a main steam line break (MSLB), or by steam-water mixtures, in the case of a recirculation line break (RLB). Some portion of the debris would likely be transported across the drywell, past/through structures such as gratings and through the downcomer vents to the suppression pool. Debris transported to the suppression pool, in addition to other sources of debris, could then be subsequently drawn to the emergency core cooling system (ECCS) suction strainers where the debris would resist ECCS water flow. If sufficient debris were deposited onto the strainers, the head loss across the debris bed could compromise the operation of the ECCS by reducing or completely blocking flow. Operational events have demonstrated the need to address this concern for all BWR plants.

An Unresolved Safety Issue (USI) was declared in January 1979, USI A-43, to address concerns regarding the availability of adequate recirculation cooling water following a LOCA when long-term recirculation must be initiated and maintained. Substantial experimental and analytical research was conducted to support the resolution of USI A-43. A main concern was that the formation of an air-core vortex would result in unacceptable levels of air ingestion and severely degrade pump performance; however, hydraulic tests showed that the potential for air ingestion was less severe than previously hypothesized. The regulatory analysis did not support a generic backfit action, but determined the issue resolution must be plant specific. The staff recommended that Revision 1 of the RG 1.82, "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident," be used as guidance for the conduct of 10CFR50.59 reviews dealing with the changeout and/or modifications of thermal insulation installed on the primary coolant system piping and components. The 50% blockage criterion of Revision 0 of RG 1.82 was considered inadequate to address this issue. USI A-43 was declared resolved in 1985.

Subsequent to the closure of USI A-43, several ECCS strainer and foreign material discovery events prompted a review of the strainer blockage issue. Perhaps the most notable of these events occurred on July 28, 1992 while restarting Barsebäck Unit 2 in Sweden (similar to U.S. Mark II BWR plants). This event followed a discharge of steam from the spurious opening of a safety valve that impinged on thermal insulation, dislodging substantial quantities of mineral wool. Mineral wool debris transported to the suppression pool and partially plugged two of five ECCS suction strainers, leading to the loss of both containment sprays within one hour of the valve opening. Operators successfully backflushed the strainers and shut down the reactor. The Barsebäck event demonstrated that larger quantities of fibrous debris could reach the strainers than had been predicted by the models and analysis methods developed for the resolution of USI A-43. Analysis of Swedish experimental data showed that prior correlations for debris head loss tended to underestimated strainer head losses.

Instances of ECCS pump strainer clogging also occurred at U. S. plants, including two instances that occurred at the Perry Nuclear Plant and another at Limerick Unit 1. In these incidents, ECCS strainers were blocked with debris consisting of fibers, corrosion products, and miscellaneous materials filtered from the pool. In one Perry incident the strainers were deformed by excessive differential pressure across the strainers caused by debris. Fibrous material acted as a filter for suspended particles creating a fibrous/particulate debris bed that resulted in a much larger pressure drop across the strainers than would have been predicted for the fibers alone; a phenomenon not previously recognized by the staff or the industry. At Limerick, pump cavitation was indicated. Other strainer blockage incidents have occurred and substantial quantities of debris were discovered in suppression pools on other occasions.

## Executive Summary

All of these events occurred despite existing NRC regulations and regulatory guidance. The NRC has consistently emphasized the need for a strong foreign material exclusion (FME) program in all areas of BWR plants that may contain materials that could interfere with the successful operation of the ECCS and safety-related containment spray system (CSS). It was clear that additional research, guidance, and possibly plant modifications were needed to resolve this issue.

Investigations of post-resolution events leading to strainer clogging found that one key aspect of the issue had not been completely researched and addressed, specifically the impact of filtered particulate by fibrous debris beds on strainer head loss. The NRC sponsored research to estimate possible shortcomings of existing suction strainer designs in U. S. BWR plants. Key technical findings are summarized here along with a summary of the actions taken by the nuclear power industry to ensure availability of long-term recirculation of cooling water in BWR plants. The NRC sponsored research included:

- A detailed plant-specific study of a BWR/4 reactor and a Mark I containment, referred to as the NUREG/CR-6224 study, where deterministic analysis focused on determining whether or not a postulated break in the primary system piping of the reference BWR plant could result in ECCS strainer blockage and loss of net positive suction head (NPSH). The study developed analytical models that would predict the generation and transport of debris to the suppression pool and then onto the strainers, and the head loss across the strainer due to an accumulation of debris. Small-scale experiments were conducted to provide critical data and to gain insights into the behavior of debris in the suppression pool and acquire mixed bed head loss data. The results demonstrated that there was a high probability that the available NPSH margin for the ECCS pumps would not be adequate following dislodging of insulation and other debris caused by a LOCA and that the loss of NPSH could occur quickly.
- Probabilistic analysis was performed that focused on evaluating the likelihood of ECCS strainer blockage and blockage-related core damage from LLOCA-initiators. The essential elements of the probabilistic methods included: 1) the estimation of the break frequency for each weld located in the primary system piping, and 2) the development of a functional event tree that models accident progression for a LOCA initiator with specific relevance to the ECCS strainer blockage issue.
- The BLOCKAGE computer program was developed to calculate debris generation, debris transport, fiber/particulate debris bed head losses, and its impact on the available NPSH.
- The NRC initiated the drywell debris transport study (DDTS) to investigate debris transport in BWR drywells using a bounding analysis approach. The study included small-scale testing of fibrous insulation transport. The DDTS provided a description of the important phenomena and plant features that control and/or dominate debris transport and the relative importance of each phenomenon as a function of the debris size.

Regulatory Guide 1.82 was revised (Revision 2) in May 1996 to alter the debris blockage evaluation guidance for BWR plants thereby providing acceptable methods for implementing applicable design requirements as required by 10CFR50.46. The staff concluded that the strainer blockage issue must be resolved by licensees in order to ensure compliance with the regulations. The NRC staff issued NRCB 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," on May 6, 1996. All BWR licensees were requested to implement appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA. The staff identified three potential resolution options but allowed licensees to propose others that provided an equivalent level

## Executive Summary

of assurance. Each BWR plant assessed their plant-specific situation and backfit their plant-specific resolution, as necessary, to resolve the issue. The BWR Owners Group (BWROG) supported the utilities by developing resolution guidance, referred to as the URG. The BWROG evaluated potential solutions and conducted tests to obtain needed data to develop the URG.

The NRC reviewed the BWROG URG document and issued the staff's Safety Evaluation Report (SER) on August 20, 1998. The URG was found to be a comprehensive document providing: 1) general guidance on resolution options, and 2) detailed guidance on performing plant specific analyses to estimate potential worst case debris loadings on ECCS suction strainers during a LOCA. However, due to incomplete guidance and inadequate supporting documentation or analysis in several areas, the staff was unable to determine if all of the methodologies, or combination of methodologies, were conservative. Therefore, the staff SER should be used in conjunction with the URG to ensure a consistent response by the industry to NRCB 96-03.

The staff was concerned that the NPSH available for ECCS and containment heat removal pumps may not be adequate under all design-basis accident scenarios. Specifically, the staff was concerned that changes to plant configuration, operating procedures, environmental conditions, or other operating parameters over the life of the plant could result in inadequate NPSH. On October 7, 1997, the NRC staff issued Generic Letter 97-04, "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps." Some licensees discovered that they must take new credit for containment overpressure to meet the NPSH requirements of the ECCS and containment heat removal pumps and the overpressure being credited by licensees may be inconsistent with the plant's respective licensing basis. The staff further evaluated its position on use of containment overpressure in calculating NPSH margin and recommended that licensing basis changes not be used as a resolution option due to the substantial uncertainty associated with determining NPSH margin.

The industry addressed the requirements of NRC 96-03 by installing large capacity passive strainers in each plant. Four BWR plants were chosen for detailed audit by NRC staff; these plants are Limerick (BWR/4 Mark II), Dresden (BWR/3 Mark I), Duane Arnold (BWR/4 Mark I), and Grand Gulf (BWR/6 Mark III).

To put the importance of strainer blockage into perspective, the risk significance was explored using existing probabilistic evaluations, i.e., the NUREG-1150 risk study and the Individual Plant Examination (IPE) Program. The risk significance was explored by examining the effect of recirculation cooling unavailability with regard to its impact on CDF for various BWR and PWR accident classes. The results indicated that the unavailability of recirculation core cooling in BWRs would increase the baseline aggregate CDF values from the E-05/yr range to the E-03/yr range. The accident classes having their CDF values most affected by recirculation cooling unavailability are the LOCA and transient accident classes. The CDFs for the station blackout, ATWS, and ISLOCA accident classes were affected to a lesser extent if recirculation cooling is unavailable.

# Overview of BWR Issue

## 1.0 OVERVIEW OF BWR STRAINER BLOCKAGE ISSUE AND RESOLUTION

A high-energy pipe break (referred to here as a loss-of-coolant accident or LOCA) in a boiling water reactor (BWR) would destroy pipe insulation (fibrous, metallic, etc.) in the vicinity of the break creating insulation debris. The area near the break where insulation debris is generated is called the zone-of-influence (ZOI). This debris would be driven away from the ZOI by high velocity steam flow, in the case of a main steam line break (MSLB), or by steam-water mixtures, in the case of a recirculation line break (RLB). Some portion of the debris would likely be transported across the drywell, past/through structures such as gratings and through the downcomer vents to the suppression pool. Debris transported to the suppression pool, in addition to other sources of debris, could then be subsequently drawn to the emergency core cooling system (ECCS) suction strainers where the debris would resist ECCS water flow. If sufficient debris were deposited onto the strainers, the head loss across the debris bed could compromise the operation of the ECCS by reducing or completely blocking flow. Operational events have demonstrated the need to address this concern for all BWR plants.

The key technical findings of USNRC research supporting the resolution of the BWR strainer blockage issue are summarized here along with a summary of the actions taken by the nuclear power industry to ensure availability of long-term recirculation of cooling water in BWR plants. As will be discussed in the historical overview, the potential for strainer blockage following a LOCA became an unresolved safety issue (USI) in 1979: USI A-43, "Containment Emergency Sump Performance" [NUREG-0933], which was subsequently resolved in 1985. However, investigation of strainer clogging events identified a key phenomenon had not been considered, specifically, the impact on strainer head loss of particulate filtration by fibrous debris beds. The NRC sponsored research to quantify this impact and to look more deeply into the strainer blockage issue in general. Each BWR plant assessed their specific situation and implemented their resolution, as necessary to resolve the issue. This report is intended to serve as a source of information regarding the strainer blockage issue, summarizing the key aspects of the issue and identifying the most important documents. The report is organized as follows.

- Section 1 provides an overview of the BWR strainer blockage issue and its resolution.
- Section 2 summarizes the NRC-sponsored research performed to gain an understanding and insights into the BWR strainer blockage issue.
- Section 3 summarizes the NRC review of applicable research sponsored by the U. S. industry and by international organizations.
- Section 4 summarizes the NRC review of the BWROG issue resolution guidance to the industry.
- Section 5 summarizes the implementation of industry resolutions of the strainer clogging issue and the NRC's review of individual plant strainer solutions.

### 1.1 Historical Overview

The chronology of the BWR strainer blockage issue and its resolution is illustrated in the timeline presented in Table 1.1 and each of these events is discussed below.

## Overview of BWR Issue

*Table 1.1. BWR Strainer Blockage Issue Timeline*

Date	Event
January 1979	NRC declared "Containment Emergency Sump Performance" as Unresolved Safety Issue (USI A-43) and published the issue's concerns in NUREG-0510, "Identification of Unresolved Safety Issues Relating to Nuclear Power Plants."
October 1985	NRC published regulatory analysis results related to resolving USI A-43 in NUREG-0869, "USI A-43 Regulatory Analysis."
October 1985	NRC published technical findings of research related to resolving USI A-43 in NUREG-0897, "Containment Emergency Sump Performance."
October 1985	NRC declared USI A-43 resolved with resolution presented to Commission in SECY-85-349, "Resolution of Unresolved Safety Issue A-43, 'Containment Emergency Sump Performance.'"
November 1985	NRC Issued Regulatory Guide 1.82, Revision 1, "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident."
December 1985	NRC issued Generic Letter 85-22, "Potential for Loss of Post-LOCA Recirculation Capability Due to Insulation Debris Blockage," outlining safety concerns and recommendations to all holders of operating licenses.
May 1992	First strainer clogging event occurred at Perry Nuclear Plant.
July 1992	Strainer blockage incident occurred at Barsebäck Unit 2 in Sweden.
March 1993	Second strainer clogging event occurred at Perry Nuclear Plant.
May 1993	NRC Issued Bulletin 93-02, "Debris Plugging of Emergency Core Cooling Suction Strainers," to all holders of operating licenses for nuclear power plants. Licenses were requested to identify and remove sources of fibrous air filters and temporary fibrous material in primary containment not designed to withstand a LOCA.
September 1993	NRC initiated detailed study of a reference BWR4 Mark I plant.
January 1994	OECD conference held in Stockholm, Sweden, to exchange information and experience and provide feedback of actions taken to the international community.
February 1994	NRC Issued Supplement 1 to Bulletin 93-02, "Debris Plugging of Emergency Core Cooling Suction Strainers," requesting licensees to take further interim actions (e.g., implementing operating procedures and conducting training and briefings).
August 1994	NRC published results of reference plant study as draft-for-comment in NUREG/CR-6224, "Parametric Study of the Potential for BWR ECCS Strainer Blockage Due to LOCA Generated Debris."
September 1995	Strainer blockage event occurred at Limerick.
October 1995	NRC published final results of reference plant study [NUREG/CR-6224].
October 1995	NRC Issued Bulletin 95-02, "Unexpected Clogging of a Residual Heat Removal (RHR) Pump Strainer While Operating in Suppression Pool Cooling Mode," to all operating BWR licenses. Licenses This bulletin requested actions be taken by licensees to ensure that unacceptable buildup of debris that could clog strainers does not occur during normal operation.
February 1996	International Knowledge Base prepared by USNRC for OECD, CSNI PWG 1 was published in NEA/CSNI/R (95) 11, "Knowledge Base for Emergency Core Cooling System Recirculation Reliability."

## Overview of BWR Issue

May 1996	NRC issued Revision 2 of RG 1.82, "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident." Revision 2 altered the debris blockage evaluation guidance for boiling water reactors because operational events, analyses, and research work after the issuance of Revision 1 indicated that the previous guidance was not comprehensive enough.
May 1996	NRC Issued Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," to all holders of operating licenses. Licensees were requested to implement appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA.
September 1996	NRC initiated a drywell debris transport study (DDTS) to investigate debris transport in BWR drywells using a bounding analysis approach.
November 1996	BWROG submitted their utility resolution guidance (URG) in NEDO-32686, Rev. 0, "Utility Resolution Guidance for ECCS Suction Strainer Blockage," to NRC for review and approval.
December 1996	The NRC strainer blockage head loss analysis code, BLOCKAGE, was completed and the code manuals published as NUREG/CR-6370, "BLOCKAGE 2.5 User's Manual," and NUREG/CR-6371, "BLOCKAGE 2.5 Reference Manual."
June 1997	The NRC reviewed submittals regarding Edwin I. Hatch Nuclear Plant, Units 1 and 2, response to NRCB 96-03. The findings were documented in a letter from N. B. Lee to H. L. Sumner, "Safety Evaluation Related to NRC Bulletin 96-03, 'Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling Water Reactors,' - Edwin I. Hatch Nuclear Plant, Units 1 and 2 (TAC Nos. M96148 and M96149)."
August 1997	NRC draft results of the DDTS in NUREG/CR-6369, "Drywell Debris Transport Study."
October 1997	NRC issued Generic Letter 97-04, "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps," to all holders of operating licenses for nuclear power plants requesting current information regarding their net positive suction head (NPSH) analyses.
October 1997	The NRC technically reviewed submittals regarding Hope Creek Generating Station response to NRCB 96-03. These findings were documented in a letter from D. H. Jaffe to L. Eliason, "Safety Evaluation for Hope Creek Generating Station - NRC Bulletin 96-03, (TAC No. M96150)."
July 1998	NRC issued Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," to all holders of operating licenses for nuclear power plants alerting addresses of continuing strainer blockage concerns and requested information under 10 CFR 50.54(f) to evaluate the addresses' programs for ensuring that Service Level 1 protective coatings inside containment do not detach from their substrate during a DB LOCA and interfere with the operation of the ECCS and safety-related containment spray system (CSS).
August 1998	NRC issued Safety Evaluation Report (SER) regarding BWROG URG as Docket No. PROJ0691, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to NRC Bulletin 96-03 Boiling Water Reactor Owners

## Overview of BWR Issue

	Group Topical Report NEDO-32686, 'Utility Resolution Guidance for ECCS Suction Strainer Blockage.'
September 1999	NRC published final results of DDTS [NUREG/CR-6369].
January 1999	NRC Audit of Limerick NRCB 96-03/95-02 Resolution
March 1999	NRC Audit of Dresden NRCB 96-03/95-02 Resolution
August 1999	NRC Audit of Grand Gulf NRCB 96-03/95-02 Resolution
October 1999	NRC Audit of Duane Arnold NRCB 96-03/95-02 Resolution
April 2000	NRC technically reviewed the licensee submittals regarding Brunswick Steam Electric Plant, Units 1 and 2, response to NRCB 96-03. The findings were documented in LA-UR-00-2574, "Technical Review of Licensee Submittals Regarding Brunswick Steam Electric Plant, Units 1 and 2 Response to US NRC Bulletin 96-03, "Potential Plugging of ECCS Strainers by Debris in Boiling Water Reactors."
April 2000	NRC technically reviewed the strainer design marketed by Performance Contracting, Inc. The findings were documented in LA-UR-00-5159, "Technical Review of Selected Reports on Performance Contracting, Inc. Sure-Flow Strainer™ Test Data."
October 2000	The NRC issued Amendment 185 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station that changed the plant's licensing basis involving the use of containment overpressure to ensure sufficient NPSH for ECCS pumps following a LOCA. This issuance was stated in a letter from A. B. Wang to M. Bellamy, "Pilgrim Nuclear Power Station – Issuance of Amendment Re: Use of Containment Overpressure (TAC No. MA7295)."

USI A-43 dealt with concerns regarding the availability of adequate long-term recirculation cooling water following a LOCA. Substantial experimental and analytical research was conducted to support the resolution of USI A-43. USI A-43 was declared resolved in 1985. Subsequent to the closure of USI A-43, several ECCS strainer and foreign material discovery events prompted a review of the strainer blockage issue. The NRC sponsored research to estimate possible shortcomings of existing suction strainer designs in U. S. BWR plants and to evaluate the actions taken by the nuclear power industry to ensure availability of long-term recirculation of cooling water in BWR plants. The historical overview is presented chronologically in the following three subsections, i.e., 1) 1.1.1 Overview of USI A-43 Resolution, 2) 1.1.2 Overview of Subsequent BWR Strainer Clogging and Pump Failure Events, and 3) 1.1.3 Overview of NRC Research and Regulatory Actions and the BWR Issue Resolution.

### 1.1.1 Overview of USI A-43 Resolution

The regulatory analysis results and the technical findings of research related to resolving USI A-43 were reported in NUREG-0869 and NUREG-0897, respectively. The key aspects of the NRC research and findings leading to the resolution of USI A-43 are summarized here. USI A-43 dealt with concerns regarding the availability of adequate long-term recirculation cooling water following a LOCA. This cooling water must be sufficiently free of debris so that pump performance is not impaired and long-term recirculation flow capability is not degraded. Although USI A-43 was principally derived from concerns regarding pressurized water reactor (PWR) containment emergency sump performance, these concerns applied to BWR ECCS suction, as well. The BWR RHR system performs the low-pressure coolant injection (LPCI) function of the ECCS and safety-related containment spray system (CSS). In addition, BWR designs incorporate a low-pressure core spray (LPCS) system as part of the ECCS. The suction strainers located in the BWR suppression pool are analogous to the PWR sump debris screen.

## Overview of BWR Issue

The concerns regarding USI A-43 were published in NUREG-0510. The technical concerns applicable to BWR plants under USI A-43 were: 1) the RHR suction intake hydraulic performance under adverse post-LOCA conditions including air ingestion and subsequent pump failure, 2) the transport of LOCA-generated debris to the suction strainers and the potential strainer blockage leading to a reduction in NPSH margin below that required to maintain long-term cooling, and 3) the capability of ECCS pumps to continue pumping when subjected to possible air, debris, or other effects on pump seal and bearing systems.

Substantial experimental and analytical research was conducted to support the resolution of USI A-43. In 1985, the staff published a summary of the key technical findings for use as an information source [NUREG-0897]. The bases for these findings were documented in a series of NRC contractor reports, which are listed in the NUREG-0897 reference section. In NUREG-0897, the NRC concluded the following:

- At the time, the formation of an air-core vortex that would result in unacceptable levels of air ingestion and severely degraded pump performance was a concern. This concern was more applicable to PWRs but was still relevant to BWR plants. Hydraulic tests showed that the potential for air ingestion was less severe than previously hypothesized. In addition, under normal flow conditions and in the absence of cavitation effects, pump performance is only slightly degraded when air ingestion is less than 2%.
- The effects of LOCA-generated insulation debris on RHR recirculation requirements depend on: 1) the types and quantities of insulation, 2) the potential of a high pressure break to severely damage large quantities of insulation, 3) the transport of debris to the sump screen or strainer, 4) the blockage potential of the transported debris, and 5) the impact on available NPSH. The effects of debris blockage on NPSH margin must be dealt with on a plant-specific basis. Insulation debris transport tests showed that severely damaged or fragmented insulation readily transported at relatively low velocities (0.2 to 0.5 ft/sec). Therefore, the level of damage near the postulated break location became a dominant consideration. The level of damage to insulation was correlated with distance between the insulation and the break, in terms of L/D's (distance divided by the pipe break diameter). Data showed that jet load pressures would inflict severe damage to insulation within 3 L/D's, and substantial damage in the 3 to 5 L/D range with damage occurring out to about 7 L/D.
- The types and quantities of debris small enough to pass through screens or suction strainers and reach the pump impeller should not impair long-term hydraulic performance. In pumps with mechanical shaft seals, debris could cause clogging or excessive wear, leading to increased seal leakage. However, catastrophic failure of a shaft seal due to debris ingestion was considered unlikely. If the seal did fail, pump leakage would be restricted.
- Nineteen nuclear power plants were surveyed in 1982 to identify insulation types used, quantities and distribution of insulation, methods of attachment, components and piping insulated, variability of plant layouts, and sump designs and locations. The types of insulation found were categorized into two major groups: reflective metallic insulation (RMI) and fibrous insulations. The RMI was manufactured by at least four different manufacturers. The fibrous insulation included NUKON™ fiberglass blankets, fiberglass molded blocks, mineral wool fiber blocks, calcium silicate molded blocks, and expanded perlite molded block. Insulations were sometimes enclosed in an outer shell or jacket or cloth cover.

## Overview of BWR Issue

The NRC resolution of USI A-43 was presented to the Commission in October 1985 [SECY-85-349]. The resolution consisted of publishing NUREG-0897 as a summary of the key technical findings for use as an information source by applicants, licensees, and the staff, 2) revising the Standard Review Plan (SRP) Section 6.2.2 and Regulatory Guide (RG) 1.82, "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident," to reflect the staff's technical findings, and 3) issuing Generic Letter 85-2, "Potential for Loss of Post-LOCA Recirculation Capability Due to Insulation Debris Blockage," to all holders of an operating license or construction permit outlining the safety concerns and recommending the use of RG 1.82, Revision 1 as guidance for conducting 10 CFR 50.59 analyses. In addition, a regulatory analysis was performed (see NUREG-0869) to serve as a basis for the final resolution of USI A-43.

The regulatory analysis did not support a generic backfit action because plant specific design features and post-LOCA recirculation flow requirements govern the debris blockage effects. As a result, the analysis conclusion was that the issue resolution must be resolved on a plant specific basis. The staff recommended that RG 1.82, Revision 1, be used as guidance for the evaluation (10 CFR 50.59) of plant modifications involving replacement and/or modification of thermal insulation installed on the primary coolant system piping and components. The 50% blockage criterion of Revision 0 of RG 1.82 was considered inadequate to address this issue.

### 1.1.2 Overview of Subsequent BWR Strainer Clogging and Pump Failure Events

Subsequent to the closure of USI A-43, several ECCS strainer and foreign material discovery events prompted a review of the strainer blockage issue for BWRs. Perhaps the most notable of these events occurred on July 28, 1992, during the startup of Barsebäck, Unit 2, in Sweden. This is discussed in NRC Information Notice (IN) 92-71, "Partial Blockage of Suppression Pool Strainers at a Foreign BWR," September 30, 1992. The Barsebäck plant is a BWR design similar to the designs of U. S. Mark II BWR plants. In this event, a spurious opening of a safety valve while the reactor was pressurized to 3100 kPa (435 psig) discharged steam into the drywell. This steam impinged on thermally insulated equipment and dislodged approximately 200 kilograms (kg) of metal-jacketed mineral wool. An estimated 100 kg of this insulation was subsequently transported into the suppression pool (approximately 30% driven by steam flow and 70% washed down by water). Mineral wool debris partially clogged two of five containment vessel spray system suction strainers leading to the loss of both containment sprays within one hour of the valve opening. The partial clogging significantly increased the pressure drop across the strainers causing indications of cavitation in one pump. Operators successfully backflushed the strainers and shut down the reactor. The Barsebäck-2 safety analysis had previously concluded that the strainers would not require backflushing during the first 10 hours following a LOCA. The regulatory authorities of Sweden and other northern and central European countries viewed the Barsebäck-2 incident as a precursor to potential loss of ECCS cooling due to LOCA-generated debris and initiated a safety reanalysis effort coupled with experiments. The results were compared with results obtained for resolution of USI A-43. The Barsebäck-2 event demonstrated that larger quantities of fibrous debris could reach the strainers than had been predicted by models and analysis methods developed for the resolution of USI A-43. Analysis of Swedish experimental data showed that prior correlations for debris head loss tended to underestimate strainer head losses.

ECCS suction strainer clogging events also occurred at U. S. plants, including two events that occurred at the Perry Nuclear Power Plant (PNPP). PNPP is a BWR/6 plant with a Mark III containment. This is discussed in NRC IN-93-34, "Potential for Loss of Emergency Cooling Function Due to a Combination of Operational and Post-LOCA Debris in Containment," May 6, 1993. On May 22, 1992, during a refueling outage inspection at the PNPP, debris was found on the suppression pool floor and on the RHR suction strainers. In addition, the buildup of debris on the strainer caused an excessive differential pressure causing deformation of the strainers. PNPP replaced the strainers and cleaned the suppression

## Overview of BWR Issue

pool. Then in March 1993, several safety relief valves lifted and the RHR was used to cool the suppression pool. The strainers were subsequently inspected and found covered with debris. A test of the strainers in the as-found condition was terminated when the pump suction pressure dropped to zero. The debris on the strainers consisted of glass fibers (temporary drywell cooling filters inadvertently dropped into the suppression pool); corrosion products, and other materials filtered from the pool water by the glass fibers adhering to the strainer surfaces [IN-93-34, Supplement 1]. The suppression pool debris also consisted of general maintenance types of materials and a coating of fine dirt that covered most of the surface of the strainers and the pool floor. Fibrous material acted as a filter for suspended particles, a phenomenon not previously recognized by the NRC or the industry. This event suggested that filtering of small particles, such as suppression pool corrosion products (sludge), by the fibrous debris would result in significantly increased pressure drop across the strainers.

Another event occurred at the Limerick Generating Station, Unit 1 on September 11, 1995. This is discussed in NRC IN-95-47, "Unexpected Opening of a Safety/Relief Valve and Complications Involving Suppression Pool Cooling Strainer Blockage," November 30, 1995. A safety relief valve (SRV) opened on Unit 1 while at 100% power. Before the SRV opened, Limerick had been running Loop A of the RHR in suppression pool cooling mode. The operators initiated a manual scram in response to the SRV opening, and a second loop (Loop B) of suppression pool cooling. Approximately 30 minutes later, fluctuating motor current and flow were observed on Loop A. The cause was believed to be cavitation and Loop A was secured. Following the event, inspection by a diver revealed a thin mat of material covering the Loop A strainer. The mat consisted of fibrous material and sludge. The Loop B strainer had a similar covering, but to a lesser extent. Limerick subsequently removed about 635 kg of debris from the pool. Similar to the PNPP events, the mat of fibers on the strainer surface converted the strainer into a filter, collecting sludge and other material on the strainer surface.

Other debris related events have occurred. The Grand Gulf Nuclear Station experienced strainer blockage events on March 18, 1988 and on July 2, 1989. Both events occurred during testing of the RHR pumps. Pump suction pressures fell below the inservice inspection acceptance criteria [IN-93-34]. On October 10, 1994, divers discovered numerous pieces of cloth-like material on the bottom of the torus and on the ECCS strainers at Browns Ferry Nuclear Plant, Unit 2 [IN-95-06]. One of the two strainers was found with about 15% of its surface covered with debris. If all of the material had been drawn onto the strainers, about 25% of the strainer surface area would have been blocked.

Substantial quantities of debris were discovered in suppression pools on other occasions. On June 13, 1994, significant amounts of assorted debris were discovered in the suppression pool of the River Bend Nuclear Station, including a plastic bag on an RHR strainer. River Bend also found sediment in the suppression pool [IN-94-57]. Similarly, on April 26 and May 11, 1994, the LaSalle County Station found and removed an assortment of operational debris from the suppression pool [IN-94-57]. The diver also noted sediment on the suppression pool floor ranging in thickness from 0.3 to 5 cm (1/8 to 2 inches). Analysis showed the sediment consisted of over 99% iron oxide, or normal system corrosion products.

In other cases, plant inspections have found deteriorated insulation that would render these materials more likely to form debris following a LOCA. On March 14, 1988, Pennsylvania Power and Light notified the NRC of the deterioration of drywell insulation at the Susquehanna plant and the potential for the aluminum jacketing on the surface of the fiberglass insulation to block ECCS strainers following a LOCA [IN-88-28]. Extensive delamination of the aluminum jacketing was discovered during a refueling inspection. This event illustrated the need for plant operators to be alert to potential problems caused by inadequately maintained insulation.

In other plant inspections, previously unidentified unqualified coatings that could form debris following a LOCA have been found.

## Overview of BWR Issue

Examples noted in Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," include:

- Millstone Unit 1 found that most of the coating in the torus was unqualified (NRC Event Report 32161),
- Unqualified coatings were found on the T-quenchers in the suppression pool of the Browns Ferry Units,
- Significant degradation to protective coatings was found in the Clinton containment wetwell (NRC Event Report 32633).

All of these events occurred despite existing NRC regulations and regulatory guidance. Title 10, Section 50.46 of the Code of Federal Regulations (10 CFR Part 50.46) requires that commercial nuclear power plants have an ECCS designed to provide long-term cooling so that core temperatures can be maintained at an acceptably low value and decay heat can be removed for the extended period required by the long-lived radioactivity in the core. Foreign materials, degraded coatings inside the containment that detach from their substrate, ECCS components not consistent with their design basis, and LOCA-generated debris, are potential common-cause failure mechanisms for the ECCS and CSS. Debris may clog suction strainers, sump screens, filters, nozzles, and small-clearance flow paths in the ECCS and safety-related CSS, and interfere with the long-term cooling function, source-term reduction or and pressure reduction capabilities of the plant. The NRC has consistently emphasized the need to minimize the presence of foreign material in the containment (e.g., a strong foreign material exclusion (FME) program). All areas of BWR and PWR plants that may contain materials could interfere with the successful operation of the ECCS and safety-related CSS. FME and housekeeping programs, including periodic inspections and cleanings, minimize the amount of foreign material and suppression pool sludge that is present in the containment. Transient debris (e.g., foreign material) and suppression pool sludge must be considered along with LOCA-generated debris in strainer sizing analyses. Each plant determines the appropriate rigor of the FME and housekeeping controls, considering the trade off between operational flexibility and ECCS strainer capacity. The FME and housekeeping programs must maintain debris source terms at levels that do not threaten the operability of the ECCS systems.

The string of operational events described above demonstrated that:

- Larger quantities of debris could reach the ECCS strainers than had been predicted by models and analyses methods developed during the resolution of USI A-43.
- Fibrous material acts as a filter for suspended particles, a phenomenon not previously recognized by the NRC or the industry.
- Head loss correlations developed during the resolution of USI A-43 under predicted strainer head losses for combined fiber/particulate debris beds.
- Extensive quantities of foreign materials were being found in suppression pools despite the ongoing FME programs.

Based on these events, additional research was conducted, guidance was developed, and plant modifications were implemented to resolve the problem.

# Overview of BWR Issue

## 1.1.3 Overview of NRC Research, Regulatory Actions, and the BWR Issue Resolution

The ECCS strainer and foreign material discovery events prompted a review of the strainer blockage issue, hence the NRC sponsored research to estimate possible shortcomings of existing suction strainer designs in U. S. BWR plants and to evaluate the actions taken by the nuclear power industry to ensure availability of long-term recirculation of cooling water in BWR plants. An overview of this research is presented in this section.

Concerns generated by these strainer blockage events prompted the NRC to issue Bulletin 93-02, "Debris Plugging of Emergency Core Cooling Suction Strainers," on May 11, 1993 to both BWR and PWR licensees. Licensees were requested to 1) identify fibrous air filters and other temporary sources of fibrous material in the primary containment not designed to withstand a LOCA, and 2) take prompt action to remove the identified material, and 3) take any other immediate compensatory measures necessary to ensure the functional capability of the ECCS.

The NRC sponsored research to evaluate the adequacy of existing suction strainer designs in U. S. BWR plants. Preliminary calculations showed that the potential existed for the ECCS pumps to lose net positive suction head (NPSH) margin due to clogging of the suction strainers by LOCA-generated debris. As a result, the NRC initiated a detailed plant-specific study in September 1993 using a reference BWR/4 reactor with a Mark I containment. The results of this were released as a "Draft for Comment" report [NUREG/CR-6224] in August 1994. Comments were received from foreign nuclear regulatory organizations, American manufacturers of thermal insulation, and the BWR Owners Group (BWROG). All comments were reviewed and NUREG/CR-6224 was revised to incorporate the feedback from the comments. The final report was published in October 1995.

A deterministic analysis was performed to determine if a postulated break in the primary system piping of the reference BWR plant could result in ECCS strainer blockage and loss of NPSH. The analysis considered debris generation, drywell debris transport, suppression pool debris transport, and strainer blockage. The study developed analytical models applicable to the reference BWR that would predict the generation of debris, the transport of debris from the drywell to the suppression pool, the transport of debris within the suppression pool to the strainers, and the head loss across the strainer due an accumulation of debris.

The NUREG/CR-6224 study identified a lack of critical data needed to complete the study. As a result, the NRC sponsored a series of small-scale experiments designed to gain insights into the behavior of debris in the suppression pool and acquire mixed debris bed head loss data. Two sets of experiments were performed. The first set of experiments tested LOCA generated debris transport in the suppression pool during both the high-energy phase immediately following the postulated LOCA as well as during the relatively quiescent phase after the high-energy conditions subside. Tests were conducted in a reduced scale suppression pool test facility. Test debris included fibrous debris, RMI debris, and particulate debris. The phenomena examined included debris resuspension from the pool floor, debris mixing, and debris settling characteristics during both the high-energy and quiescent phases and fragmentation of fibrous debris subjected to high levels of turbulence. The second set of experiments examined the effect of debris on strainer head loss. Fibrous debris was tested with and without the addition of particulate debris and both the strainer head loss and the filtration efficiencies of fibrous debris beds (e.g. to filter and trap micron range sludge particles) were measured. RMI debris was tested both by itself and in combination with fibrous debris (mixed debris beds). A closed loop test facility was designed to conduct these experiments.

## Overview of BWR Issue

A computer program called BLOCKAGE was developed to calculate debris generation, debris transport, fiber/particulate debris bed head losses, and the impact of the debris on the available ECC NPSH. The BLOCKAGE code included models for transient debris bed formation and used a fiber/particulate head loss correlation developed during in the reference plant study. The head loss correlation, known as the NUREG/CR-6224 head loss correlation, is valid for laminar, transient, and turbulent flow regimes through mixed debris beds.

Probabilistic analyses were performed that focused on evaluating the likelihood of ECCS strainer blockage and blockage-related core damage from LLOCA-initiators. The major elements of the probabilistic analyses included: 1) estimation of the break frequency for each weld located in the primary system piping, and 2) development of a functional event tree that models accident progression for a LOCA initiator with specific relevance to the ECCS strainer blockage issue. Quantification of the event tree resulted in estimates of the core damage frequency (CDF) from the loss of ECCS due to strainer blockage following a LOCA.

The NRC also exchanged information and experience with the international community. The Swedish nuclear power inspectorate, Statens Kärnkraftinspektion (SKI), hosted a workshop to study the strainer blockage issue on January 26-27, 1994. The workshop was held in Stockholm, Sweden, under the auspices of the Committee on the Safety of Nuclear Installations/Principal Working Group 1 (CSNI/PWG-1). The workshop revealed a confusing picture of the available knowledge base, including examples of conflicting information and a variety of interpretations of the regulatory guidance in the NRC's RG 1.82, Rev. 1. Following this workshop, SKI requested the formation of an international working group under the auspices of the CSNI/PWG-1 committee to establish an internationally agreed-upon knowledge base for assessing the reliability of ECC water recirculation systems. The NRC compiled a source book of available knowledge for the CSNI of the Organization for Economic Cooperation and Development (OECD) Nuclear Energy Agency, which was published in February 1996. This source book is found in report NEA/CSNI/R (95) 11, "Knowledge Base for Emergency Core Cooling System Recirculation Reliability." At the time of its publishing, this knowledge base summarized the available experimental and analytical information/data on the following: debris generation, and debris sources, drywell debris transport, suppression pool debris transport, strainer head losses, related potential safety issues, and debris generation events (e.g., the Barsebäck-2 LOCA).

Based on the NRC's preliminary research and information learned at the OECD/Nuclear Energy Agency (NEA) workshop, the NRC issued Supplement 1 to Bulletin 93-02 on February 18, 1994 requesting BWR licensees to take further interim actions pending final resolution. These actions involved implementing operating procedures and conducting training and briefings designed to enhance the capability to prevent or mitigate loss of ECCS following a LOCA due to strainer clogging. The purpose of these interim actions was to ensure reliability of the ECCS so that the staff and industry would have sufficient time to develop a permanent resolution.

The NRC's investigation of the strainer blockage event at Limerick-1 identified additional concerns that prompted the NRC to issue Bulletin 95-02, "Unexpected Clogging of Residual Heat Removal (RHR) Pump Strainer While Operating in Suppression Pool Cooling Mode," on October 17, 1995 to all BWR licensees. A mat of fibers and sludge blocked a strainer at Limerick-1. Subsequent to the event approximately 635 kg of debris was removed from the pool. The Limerick event demonstrated the need to ensure adequate suppression pool cleanliness and it re-emphasized that materials other than fibrous insulation could also clog strainers. This bulletin requested actions be taken by BWR licensees to prevent unacceptable buildup of debris that could clog strainers does not occur during normal operation. Specifically, BWR licensees were requested to: 1) verify the operability of all their pumps drawing suction from the suppression pool when performing their safety function, 2) schedule a suppression pool

## Overview of BWR Issue

cleaning, and 3) review FME procedures and their implementation to determine whether adequate control of materials in the drywell, suppression pool, and systems that interface with the suppression pool exists.

In order to provide time to conduct research to resolve the strainer clogging issue, the NRC first ensured that public health and safety were adequately protected. In responding to NRC Bulletin 93-02 and its supplement, BWR licensees implemented interim measures to ensure adequate protection of public health and safety. Specifically, licensees ensured that: 1) alternate water sources (both safety and non-safety-related sources) to mitigate a strainer clogging event were available, 2) emergency operating procedures (EOP) provided adequate guidance on mitigating a strainer clogging event, 3) operators were adequately trained to mitigate a strainer clogging event, and 4) loose and temporary fibrous materials stored in containment were removed. The responses to NRC Bulletin 95-02 showed that most suppression pools had already been cleaned recently, and that those licensees who had not cleaned their suppression pools recently were scheduled to do so during their next refueling outage. In addition, a generic safety assessment conducted by the BWROG concluded that operators would have adequate time to make use of alternate water sources (25-35 minutes), if needed, during a LOCA and that the probability of the initiating event is low. For these reasons, the NRC allowed continued operation by BWR licensees until the final resolution to the strainer clogging issue was developed and implemented. The NRC initiated the final resolution to the strainer issue with the issuance of NRC Bulletin 96-03. Satisfactory implementation of the requested actions in NRC Bulletin 96-03 will ensure that the ECCS can perform its safety function and minimize the need for operator action to mitigate a LOCA.

The final results of the reference plant study, documented in NUREG/CR-6224, demonstrated that for the reference plant, there was a high probability that the available NPSH margin for the ECCS pumps would be inadequate if insulation and other debris caused by a LOCA transported to the suction strainers. In addition, the study calculated that the loss of NPSH could occur quickly (less than 10 minutes into the event). The study also concluded that determining the adequacy of NPSH margin for a given ECCS system is highly plant-specific because of the large variations in such plant characteristics as containment type, ECCS flow rates, insulation types, plant layout, plant cleanliness, and available NPSH margin.

The Barsebäck event demonstrated that a pipe break could generate and transport sufficient quantities of insulation and other debris to the suppression pool to cause the ECCS to lose NPSH. The Perry events further demonstrated that fibrous debris combined with corrosion products present in the suppression pool (sludge) could exacerbate the problem. The effect of filtering sludge from the suppression pool water by fibrous debris deposited on the strainer surface was further confirmed in NRC-sponsored testing conducted at the Alden Research Laboratory (ARL). ARL's tests clearly demonstrated that the pressure drop across the strainer was greatly increased by this filtering effect [NUREG/CR-6367]. Additional NRC sponsored testing by the NRC at ARL demonstrated that suppression pool energy levels during the "chugging" phase of a LOCA are sufficient to suspend and evenly distribute fibrous debris and sludge throughout suppression pool. In addition, ARL demonstrated that debris could remain suspended for a long period allowing large debris quantities to be deposited onto the strainer surfaces. The NRC concluded that this problem is applicable to all domestic BWR plants because, (1) there do not appear to be any features specific to a particular plant, class of plants, or containment type that would mitigate or prevent the generation, the transport to the suppression pool, or the deposition on the ECCS strainers of sufficient material to clog the strainers, and (2) parametric analyses performed in support of the NUREG/CR-6224 study, using parameter ranges which bound most domestic BWR plants, failed to find parameter ranges that would prevent BWR plants with other containment types from being susceptible to this problem. Furthermore, the NRC study was conducted on a Mark I; Barsebäck had a strainer clogging event and is similar in design to a Mark II; and Perry, a Mark III, also had a strainer clogging event.

An essential aspect of predicting the potential for strainer clogging is the estimation of the amount of debris that is likely to transport from the drywell into the wetwell. The transport processes are complex,

## Overview of BWR Issue

in that, they involve transport during both the reactor blowdown phase (i.e., entrainment in steam/gas flows) and the post-blowdown phase (i.e., via water flowing out of the break and/or containment sprays). The NUREG/CR-6224 analyses reasoned that the congested layout of the drywell would offer large surface areas for debris retention. However, due to the lack of applicable experimental or analytical data, the fraction of debris transported to the wetwell was estimated on the basis of engineering judgment derived from the analysis of Barseback-2 event data. However, the NRC concluded that any engineering judgment based on a scarce set of experimental data would have large uncertainties: Therefore, NUREG/CR-6224 transport factors could not be defended. As a result, Revision 2 of Regulatory Guide 1.82, the NRC recommended assuming 100% debris transport unless analyses or experiments justified lower transport fractions. However, limited existing data indicated that potentially much less than 100% would be transported. In order to facilitate a better understanding of debris transport, the NRC initiated a study in September 1996, referred to as the drywell debris transport study (DDTS), to investigate debris transport in BWR drywells using a bounding analysis approach. The focus of the DDTS was to provide a description of the important phenomena and plant features that control and/or dominate debris transport and the relative importance of each phenomenon as a function of the debris size. The results of the DDTS, documented NUREG/CR-6369, provide reasonable engineering insights that can be used to evaluate the adequacy of debris transport factors used in plant-specific strainer blockage analyses.

The NRC issued RG 1.82, Revision 2, in May 1996. This regulatory guide describes acceptable methods for implementing applicable design requirements for sumps and suppression pools functioning as water sources for emergency core cooling, containment heat removal, or containment atmosphere cleanup. In addition, guidelines for evaluating the adequacy of the sump and suppression pool for long-term recirculation cooling following a LOCA are provided. This regulatory guide was revised to update the BWR to debris blockage evaluation guidance because operational events, analyses, and research work since the issuance of Revision 1 indicated that the previous guidance was not comprehensive enough to adequately evaluate a BWR plant's susceptibility to the detrimental effects caused by suction strainer debris blockage.

The NRC staff issued NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," on May 6, 1996. All BWR licensees were requested to implement appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA. The staff had identified three potential resolution options but allowed licensees to propose others that provided an equivalent level of assurance. The three options identified by the staff were: 1) to install a large capacity passive strainer designed with sufficient capacity to ensure that debris loadings equivalent to a scenario calculated in accordance with Section C.2.2 of RG 1.82, Revision 2 and do not cause a loss of NPSH for the ECCS, 2) install a self-cleaning strainer that automatically prevents strainer clogging by providing continuous cleaning of the strainer surface with a scraper blade or brush, and 3) install a backflush system that relies on operator action to remove debris from the surface of the strainer to prevent it from clogging. Option 1 had the advantages of being completely passive so that operator intervention was not required and it did not require an interruption of ECCS flow. Licensees choosing Option 1 for resolution were required to establish new or modify existing programs, as necessary, to ensure that the potential for debris to be generated and transported to the strainer surface does not at any time exceed the assumptions used in estimating the amounts of debris for sizing of the strainers in accordance with RG 1.82, Revision 2. Option 2, like Option 1, would not rely on operator action or interrupt ECCS flow but it did rely on an active component to keep the strainer surface clean that would be fully exposed to the LOCA effects in the suppression pool, therefore, appropriate measures must be taken to ensure its operability. With the selection of Option 3, extensive measures had to be taken: 1) to maximize the amount of time before clogging could occur; 2) to ensure that instrumentation and alarms indicate when strainer differential pressure increases; 3) to institute operator training on recognition and mitigation of a strainer clogging event; and 4) to implement surveillances to ensure the

## Overview of BWR Issue

operability of the strainer instrumentation and backflush system. All licensees were requested to implement these actions by the end of the first refueling outage starting after January 1, 1997.

It was recognized when NRCB 96-03 was issued that plant-specific analyses to resolve the strainer issue are difficult to perform because a substantial number of uncertainties are involved. Examples of these uncertainties include the amount of debris that would be generated by a pipe break for various insulation types; the amount of debris that would be transported to the suppression pool; the characteristics of debris reaching the suppression pool (e.g., size and shape); and head-loss correlations for various insulation types combined with suppression pool corrosion products, paint chips, dirt, and other particulates. Many of these uncertainties are plant-specific because of differences in plant characteristics such as plant layout, insulation types, ECCS flow rates, containment types, plant cleanliness, and NPSH margin. Testing was conducted to quantify many of these uncertainties.

The staff closely followed the BWROG's efforts to resolve this issue. The BWROG evaluated several potential solutions, and completed testing on three new strainer designs: two passive strainer designs and one self-cleaning design. The BWROG effort was consistent with the options proposed in NRCB 96-03 for resolution of the ECCS potential strainer clogging issue. The BWROG then developed topical report NEDO-32686, "Utility Resolution Guidance for ECCS Suction Strainer Blockage," November 1996, (the URG) to provide utilities with: 1) guidance on evaluation of the ECCS potential strainer clogging issue for their plant, 2) a technically sound, standard industry approach to resolution of the issue, and 3) guidance that is consistent with the requested actions in NRCB96-03 for demonstrating compliance with 10 CFR 50.46. The URG includes guidance on calculational methodologies for performing plant specific evaluations.

The BWROG and the industry conducted several small-scale tests to obtain data needed to develop the URG and to qualify plant-specific strainer designs. The URG included substantial portions of this data. As a result, this data was available for NRC for review. Specifically, these tests included:

- Air jet impact testing of fibrous and RMI insulation resulting in data relevant to debris generation and debris airborne transport including debris capture data, (e.g., by gratings).
- Scaled debris airborne transport for fibrous and RMI debris by steam and flashing water flows.
- Waterborne debris transport in a linear flume.
- Head loss tests for alternate strainer designs, i.e., truncated cone, stacked disk, and star designs.

The staff noted in NRC Bulletin 96-03 that much of the effort and discussion on this issue had focused on the threat caused by fibrous insulation. While the staff recognized that fibrous insulation represents the largest source of fibrous material in the containment, licensees were reminded in NRC Bulletin 96-03 that both the Perry and the Limerick events involved other sources of fibrous debris. In determining their resolution for this issue, licensees were reminded to focus on protecting the functional capability of the ECCS from all potential strainer-clogging mechanisms.

The NRC reviewed the URG and issued its Safety Evaluation Report (SER) on August 20, 1998 [NRC-SER-URG]. In the SER, the staff noted that the issue of potential strainer blockage is complex, in that, head loss across suction strainers is not only a function of the amount of debris, but also of the types (e.g., fibrous insulation, paint, reflective metallic insulation, dirt, corrosion products, etc.) and characteristics of the debris (size, shape, etc.). The analyst must evaluate the worst case for potential strainer debris loadings, consider the potential for foreign material to be introduced during normal plant evolutions such

## Overview of BWR Issue

as refueling and maintenance outages, and evaluate maintenance practices including the maintenance of qualified coatings in the drywell and wetwell.

The staff found the URG to be comprehensive, providing general guidance on resolution options, and detailed guidance on performing plant specific analyses to estimate potential worst case debris loadings on ECCS suction strainers during a LOCA. For performing a plant-specific analysis, the URG provides methodologies for: 1) estimating the amounts and types of debris that could be generated by a LOCA, 2) estimating the amount of the generated debris which could be transported to the suppression pool, 3) estimating the amount of debris that could be entrained on the ECCS suction strainer surfaces, 4) determining the head loss caused by the estimated debris accumulation, and 5) calculating the NPSH margin. The URG provides flexibility to utilities by including multiple methods for performing each part of the plant-specific analysis. However, the URG lacks complete guidance and/or adequate supporting analysis in several areas. As a result, the staff was unable to determine if all of the methodologies, or combination of methodologies, were acceptable. Similarly, much of the general guidance on "resolution options" also lacked sufficient detail for the staff to review. Since insufficient detail and supporting justification on the "resolution options," was included in the URG, further supporting justification from a licensee or the BWROG was required for the staff to reach a conclusion on their acceptability. However, based on the information provided in the URG, the staff did conclude the use of self-cleaning strainers should be discouraged, and that backflushing should only be used as a defense-in-depth measure.

In the URG, the BWROG states that a licensee's resolution to the strainer clogging issue may include a licensing basis change. However, the URG specifically states that the use of credit for a containment overpressure is not recommended. The Advisory Committee on Reactor Safeguards (ACRS) agreed with the BWROG. In a letter from the ACRS to the NRC Executive Director for Operations (EDO) explicitly stated, "We believe that allowing some level of containment overpressure is not an acceptable corrective action because adequate overpressure may not be present when needed [ACRS-Letter]." The staff also concurred that additional containment overpressure (other than an amount already approved by the staff for the existing licensing basis on certain plants) should not be used as part of the resolution of this issue.

The NRC staff issued Generic Letter (GE) 97-04, "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps," to all holders of operating licenses for nuclear power plants on October 7, 1997. The staff wanted to ensure that the NPSH available for ECCS and containment heat removal pumps would be adequate under all design-basis accident scenarios. The staff was concerned that changes to plant configuration, operating procedures, environmental conditions, or other operating parameters over the life of the plant could result in inadequate NPSH. Some licensees discovered that they needed to have their licensing basis to include credit for containment overpressure to meet the NPSH requirements of the ECCS and containment heat removal pumps. Some licensees were assuming containment overpressure credit inconsistent with the plant's licensing basis. GL 97-04 requested addressees to provide current information regarding their NPSH analyses.

The staff evaluated its position on the use of containment overpressure in calculating NPSH margin as part of its review of industry responses to Generic Letter 97-04. The concerns that led to the issuance of GL-97-04 illustrated an existing uncertainty and variability in the application of the methods used to calculate NPSH margin. These concerns were confirmed by the review of the industry submittals [SEA97-3705]. Because there is substantial uncertainty associated with the strainer clogging issue, the staff did not recommend licensing basis changes as a "resolution option."

The technical evaluation report (TER), SEA97-3705, "Reliance on Containment Overpressure for Ensuring Appropriate NPSH," supporting GL-97-04 illustrated the uncertainty associated with overpressure analyses. Overpressure analyses are detailed and comprehensive analyses performed to conservatively predict the minimum containment pressure available during a DBA. All means of

## Overview of BWR Issue

removing heat from the containment is considered including all installed pressure-reducing systems and processes. These systems and processes include heat transfer to structures, containment leakage, containment sprays, pool surface heat and mass transfer, fan coolers, RHR heat removal heat exchangers, and power conversion systems. Because the NPSH is strongly dependent upon the accident scenario, a comprehensive range of accident scenarios is evaluated to ensure that the minimum pressure is conservatively determined for the purpose of granting an overpressure credit.

The USNRC issued Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," on July 14, 1998 to all holders of operating licenses for operating nuclear power reactors. GL98-04 alerted addressees of additional strainer blockage concerns including problems associated with: 1) the material condition of Service Level 1 protective coatings inside the containment, 2) foreign material found inside operating nuclear power plant containments, and 3) design and construction deficiencies with the material condition of ECCS systems, structures, and components inside the containment. The NRC expected addressees to ensure that the ECCS and the safety-related CSS remain capable of performing their intended compliance. Addressees requested information under 10 CFR 50.54(f) so that the staff could evaluate the licensee programs for ensuring that Service Level 1 protective coatings inside containment do not detach from their substrate during a DBA and interfere with the operation of the ECCS and safety-related CSS. The NRC utilized this information to assess whether current regulatory requirements were being correctly implemented and to determine whether the requirements needed revision.

The industry addressed the requirements of NRC Bulletin 96-03 by installing large capacity passive strainers in each plant (NRCB 96-03 Option 1) with sufficient capacity to ensure that debris loadings equivalent to a scenario calculated in accordance with Section C.2.2 of RG 1.82, Revision 2 do not cause a loss of NPSH for the ECCS. Four BWR plants were chosen for detailed audits by the NRC staff. These plants are Limerick (BWR/4 Mark II), Dresden (BWR/3 Mark I), Duane Arnold (BWR/4 Mark I), and Grand Gulf (BWR/6 Mark III). The results of these plant audits are summarized in Table 1-2 and are described in greater detail in Section 5.2 of this report.

**Table 1-2. Issue Resolution Summary for Audited Plants**

Plant	Design	Insulation Types Located in the Drywell	Plant Resolution	Resolution Basis	NRC Audit Findings
Grand Gulf Nuclear Station	BWR/6 Mark III	RMI Kaowool Calcium-Silicate Fiberglass	Increased existing strainer surface area from 170 ft <sup>2</sup> to 6253 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG supported by 1/4 scale testing.	Licensee conservatively estimated debris generation, transport, and strainer head loss. NRC estimated head-losses substantially less than licensee estimate.

## Overview of BWR Issue

Limerick	BWR/4 Mark II	NUKON Min-K RMI**	Increased existing strainer surface area from 269 ft <sup>2</sup> to 2715 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG. Head-loss estimate less than 4 ft-water and NPSH margin of 12 ft-water.	Licensee conservatively estimated debris generation, transport, and strainer head loss. NRC estimated head-loss less than 2 ft-water.
Duane Arnold	BWR/4 Mark I	NUKON Calcium-Silicate** RMI** Lead Wool**	Increased existing strainer surface area from 38 ft <sup>2</sup> to 1359 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG and GE head loss correlation.	Licensee used NRC-approved methods to estimate debris generation and transport, and estimated conservative strainer head loss.
Dresden	BWR/3 Mark I	RMI NUKON Calcium-Silicate** Asbestos** Amaflex**	Increased existing strainer surface area from 18.8 ft <sup>2</sup> to 475 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG and plant specific alternate methods.	NRC determined licensee strainers adequately sized, although inconsistencies and deviations from URG found in licensee analyses.

\* Majority of total insulation of this type.

\*\* Insulation screened out of analysis due to location, e.g., inside biological shield.

### 1.2 Regulatory Considerations

Federal regulations were established to govern design and operational aspects of nuclear power reactors that affect the safety of those plants. These regulations are codified in the Code of Federal Regulations (CFR). Title 10 of the CFR deals with energy and Part 50 of Title 10 consists of regulations promulgated by the NRC to provide for the licensing of production and utilization of facilities. The NRC published Regulatory Guidance (RG) documents to guide the nuclear power industry to compliance with the regulations. Regulations and regulatory guidance applicable to the strainer blockage issue are summarized in Sections 1.2.1 and 1.2.2, respectively.

#### 1.2.1 Code of Federal Regulations

This section provides a description of the regulations that apply to the strainer blockage issue. Title 10 of the *Code of Federal Regulations* provides the authority to the NRC to regulate nuclear power plants. Section 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light-Water Nuclear Power Reactors," of 10 CFR requires that licensees of a boiling or pressurized water reactor design their ECCS systems to meet five criteria. Specifically the rule provides acceptance criteria for peak cladding temperature, maximum cladding oxidation, maximum hydrogen generation, coolable core geometry, and long-term cooling. The long-term cooling criteria states "After any calculated successful initial operation of the ECCS, the calculated core temperature shall be maintained at an acceptably low value and decay heat shall be removed for the extended period of time required by the long-lived radioactivity remaining in the core." Licensees are required to demonstrate this capability while assuming the most conservative (worst) single failure. Some licensees may credit CSSs in the licensing basis for radioactive source term and pressure reduction. The capability of the ECCS and safety-related CSS pumps to fulfill the criteria of limiting the peak cladding temperature and to provide long-term cooling over the duration of the

## Overview of BWR Issue

postulated accident could be seriously compromised by the loss of adequate NPSH and the resulting cavitation. Operational experience and detailed analysis demonstrated that excessive buildup of debris from thermal insulation, corrosion products, and other particulates on ECCS pump strainers is highly likely to cause a common-cause failure of the ECCS thereby preventing the ECCS from providing long-term cooling following a LOCA. Therefore, Section 50.46 clearly applies to the strainer blockage issue and licensees must resolve this issue for their respective plants in order to ensure compliance with the regulations.

General Design Criteria (GDC) 35, 36, and 37 [Appendix A to 10 CFR Part 50] require appropriate design, inspectability, and testability of the ECCS. Note that these GDC establish minimum requirements for the principal design criteria for water-cooled nuclear power plants similar in design and location to plants for which construction permits have been issued by the Commission. The GDC are also considered to be generally applicable to other types of nuclear power units and are intended to provide guidance in establishing the principal design criteria for such other units. Specifically, these criteria state the following:

*Criterion 35 -- Emergency core cooling.* A system to provide abundant emergency core cooling shall be provided. The system safety function shall be to transfer heat from the reactor core following any loss of reactor coolant at a rate such that (1) fuel and clad damage that could interfere with continued effective core cooling is prevented and (2) clad metal-water reaction is limited to negligible amounts. Suitable redundancy in components and features, and suitable interconnections, leak detection, isolation, and containment capabilities shall be provided to assure that for onsite electric power system operation (assuming offsite power is not available) and for offsite electric power system operation (assuming onsite power is not available) the system safety function can be accomplished, assuming a single failure.

*Criterion 36 -- Inspection of emergency core cooling system.* The emergency core cooling system shall be designed to permit appropriate periodic inspection of important components, such as spray rings in the reactor pressure vessel, water injection nozzles, and piping, to assure the integrity and capability of the system.

*Criterion 37 -- Testing of emergency core cooling system.* The emergency core cooling system shall be designed to permit appropriate periodic pressure and functional testing to assure (1) the structural and leaktight integrity of its components, (2) the operability and performance of the active components of the system, and (3) the operability of the system as a whole and, under conditions as close to design as practical, the performance of the full operational sequence that brings the system into operation, including operation of applicable portions of the protection system, the transfer between normal and emergency power sources, and the operation of the associated cooling water system.

Section 50.65 of 10 CFR Part 50, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants," (referred to hereinafter as in Maintenance Rule) provides the requirements for monitoring and maintenance of plant structures, systems, and components (SSCs). The maintenance rule requires the licensee of a nuclear power plant to monitor the performance or condition of SSCs in a manner sufficient to provide reasonable assurance that the SSCs are capable of fulfilling their intended functions. When the performance or condition of an SSC does not meet its established goals, appropriate action shall be taken. Based on the criteria in the rule, the maintenance rule includes in its scope BWR suction strainers, all safety-related CSSs, and those non-safety-related CSSs that fall into the following categories:

- (1) Those that are relied upon to mitigate accidents or transients or are used in plant emergency operating procedures,

## Overview of BWR Issue

- (2) Those whose failure could prevent safety-related CSSs from fulfilling their safety-related function, and
- (3) Those whose failure could cause a reactor scram or an actuation of a safety-related system.

Protective coatings are also covered by the maintenance rule to the extent that coating activities can affect safety-related equipment, e.g., suction strainers. On the basis of the guidelines in the rule, the maintenance rule requires that licensees monitor the effectiveness of maintenance for these protective coatings. The staff also considers the requirements of 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to be applicable to safety-related containment coatings. Criterion IX of Appendix B, "Control of Special Processes," is especially relevant requiring that "Measures shall be established to assure that special processes are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Appendix K of 10 CFR Part 50, "ECCS Evaluation Models," establishes requirements for analytical determinations that impact aspects of the strainer blockage issue. These analytical requirements include: 1) fission product decay heat generation rate (impacts the calculated suppression pool temperature), 2) break flow characteristics and discharge model (impacts the estimated amounts of debris), 3) post-blowdown phenomena and heat removal by the ECCS, and 4) required ECCS model documentation. Appendix K also specifies that single failures be considered and the containment pressure to be used for evaluating cooling effectiveness.

### 1.2.2 Regulatory Guidance

This section provides a description of regulatory guidance that applies to the strainer blockage issue. The NRC provided guidance on ensuring adequate long-term recirculation cooling following a LOCA in Regulatory Guide RG 1.82, "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident." The guide describes acceptable methods for implementing applicable GDC requirements with respect to the sumps and suppression pools functioning as water sources for emergency core cooling, containment heat removal, or containment atmosphere cleanup. Guidelines for evaluating availability of the sump and suppression pool for long-term recirculation cooling following a LOCA are included in the RG.

Revisions 1 and 2 of RG 1.82 were issued in November 1985 and May 1996, respectively. The first revision, Revision 1, reflected the staff's technical findings, related to USI A-43, that were reported in NUREG-0897. A key aspect of the revision was the staff's recognition that the 50% strainer blockage criteria of Revision 0 did not adequately address the issue and was inconsistent with the technical findings developed for the resolution of USI A-43. It was assumed in Revision 0 that the minimum NPSH margin could be computed by assuming that 50% of the screen area was blocked by debris. GL 85-22 recommended use of RG 182 Revision 1 for changeout and/or modifications of thermal insulation installed on primary coolant system piping and components. Revision 2 altered the strainer blockage guidance for BWRs reactors redundant because operational events, analyses, and research following Revision 1 indicated that the previous guidance was not comprehensive enough to adequately evaluate a BWR plant's susceptibility to the detrimental effects caused by debris blockage of the suction strainers.

RG 1.82 Revision 2 guidance addressed operational debris, as well as, debris generated by a postulated LOCA. Specifically, the RG stated that all potential debris sources should be evaluated including, but not limited to, insulation materials (e.g., fibrous, ceramic, and metallic), filters, corrosion material, foreign materials, and paints/coatings. Operational debris included corrosion products, (such as BWR suppression pool sludge), and foreign materials (although foreign material exclusion (FME) procedures were not specifically introduced into Rev. 2). Revision 2 also noted that debris could be generated and

## Overview of BWR Issue

transported by the washdown process, as well as, the blowdown process. Other important aspects of Revision 2 included: the use of debris interceptors (i.e., suction strainers) in BWR designs to protect pump inlets and NPSH margins; the design of passive and/or active strainers; instrumentation, inservice inspections; suppression pool cleanliness; the evaluation of alternate water sources, analytical methods for debris generation, transport, and strainer blockage head loss, and the need for appropriate supporting test data. Revision 2 references provide further detailed technical guidance for the evaluation of potential strainer clogging.

RG 1.82 Revision 2 cited RG 1.1, "Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal System Pumps," for specific conditions to be used in determining the available NPSH for ECCS pumps in a BWR plant's licensing basis. RG 1.1 considered the potential for degraded pump performance for ECCS and containment heat removal, which could be caused by a number of factors, including inadequate NPSH. If the available NPSH to a pump is not sufficient, cavitation of the pumped fluid can occur, thereby significantly reducing the capability of the system to accomplish its safety functions. It is important that the proper performance of ECCS and containment heat removal systems be independent of calculated increases in containment pressure caused by postulated LOCAs in order to assure reliable operation under a variety of postulated accident conditions. The NRC's regulatory position is that the ECCS and containment heat removal systems should be designed with adequate NPSH margin assuming the maximum expected temperatures of the pumped fluids and no increase in containment pressure from that present prior to postulated LOCAs.

The NRC issued Revision 1 of Regulatory Guide 1.54, "Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants," in July 2000 to provide guidance regarding compliance with quality assurance requirements related to protective coating systems applied to ferritic steel, aluminum, stainless steel, zinc-coated (galvanized) steel, and masonry surfaces. The revision encourages industry to develop codes, standards, and guide that can be endorsed by the NRC and carried out by industry. With noted exceptions, the ASTM standards cited in the Regulatory Position of Revision 1 for the selection, qualification, application, and maintenance of protective coatings in nuclear power plants have been reviewed by the NRC staff and found acceptable.

Additional guidance is found in the applicable sections of NRC Standard Review Plan (SRP) [NUREG-0800]. These sections include: 1) Section 6.2.2, "Containment Heat Removal Systems," 2) Section 6.1.2, "Protective Coating Systems (Paints) – Organic Materials," and 3) Section 6.2.1.5, "Minimum Containment Pressure Analysis for Emergency Core Cooling System Performance Capability Studies."

### 1.3 Related International Experience

Many foreign countries look to the United States for guidance regarding nuclear power plant safety. Before the Barsebäck-2 strainer blockage event, international regulators of nuclear power plants and the nuclear power industry had considered safety questions related to strainer clogging as resolved [NEA/CSNI/R (95) 11]. Many European countries had applied the BWR strainer guidance contained in the RG 1.82, Revision 0 to PWR designs. However, data obtained from European experimental programs performed during the late seventies to determine the performance of strainers indicated that this guidance was not adequate.

In addition, Swedish utilities had used this guidance to assess ECCS's performance in their plants. Analyses at that time had indicated that strainer clogging would not occur for at least ten hours after a LOCA. Since operation of the ECCS cooling would be required for a much longer time than ten hours, backflushing capabilities and strainer pressure drop monitors were installed in older Swedish BWR plants with smaller strainer areas. These actions (particularly the backflushing capability) were considered to adequately comply with NRC RG 1.82, Revision 1, issued in 1985. Safety questions related to strainer

## Overview of BWR Issue

clogging were considered resolved until the Barsebäck-2 strainer clogging event, which showed that clogging and loss of NPSH margin could occur quickly. Although the event itself was not very serious, it revealed a weakness in the defense-in-depth concept, which under other circumstances could have led to the ECCS failing to maintain adequate cooling.

The Barsebäck event spurred immediate action on the part of regulators and utilities alike in several OECD countries (e.g., Sweden, Finland, Germany, Switzerland, and France). For example, the Swedish nuclear power inspectorate Statens Kärnkraftinspektion (SKI), required immediate measures to be taken to prevent strainer clogging in the five oldest Swedish BWRs. These plants had small strainers. Research and development efforts of varying intensity were launched in many countries and in several cases resulted in findings that earlier strainer clogging data were incorrect because essential parameters and physical phenomena (such as insulation aging) had not been previously recognized. As a result, many BWRs and some PWRs in several OECD countries upgraded their ECCS suction to solve the problem.

Some members of the European nuclear community adapted an approach to resolving the ECCS clogging NPSH issue that was based on a three major mitigating actions. These actions include: 1) the use of larger strainer areas to reduce the likelihood of ECCS NPSH loss, 2) the installation of pressure differential sensors on the ECCS strainers to provide a means for operators to accurately diagnose a potential blockage condition, and 3) the installation of strainer backflushing equipment to provide operators with a means to restore operation to pumps following a loss of NPSH.

The United States has benefited substantially by the exchanged information and experience with the international community. The Europeans conducted several valuable experiments, with data that was directly applicable to U. S. plants. These tests are described in NEA/CSNI/R (95) 11, "Knowledge Base for Emergency Core Cooling System Recirculation Reliability," February 1996, compiled by the USNRC [NEA/CSNI/R (95) 11] for the CSNI of the OECD NEA, which was published in February 1996.

### 1.4 Risk Significance of Strainer Blockage

To put the importance of strainer blockage into perspective, the risk significance was explored using existing probabilistic evaluations. Data from two very substantial NRC sponsored risk studies were utilized for this purpose. First, detailed risk assessments were performed for five U. S. nuclear power plants including exhaustive predictions of plant core damage frequency (CDF). These assessments are reported in NUREG-1150, "Severe Accident Risks: An Assessment for Five U. S. Nuclear Power Plants," 1990. During the preparation of NUREG-1150, numerous supporting documents were created including the NUREG/CR-4550 reports. These reports were considered in the strainer blockage risk evaluation. The second risk study was the Individual Plant Examination (IPE) Program where plants chose to perform probabilistic risk assessments (PRA) after the NRC recognized that systematic examinations are beneficial in identifying plant specific vulnerabilities to severe accidents. Each operating nuclear power plant performed a plant specific probabilistic analyses that determined both the CDF and containment performance for accidents initiated by internal events. The NRC reviewed the plant IPE submittals and published the results of their review in NUREG-1560, "Individual Plant Examination Program: Perspectives on Reactor Safety and Plant Performance," 1997.

The risk significance of strainer blockage was evaluated in NUREG/CR-6224 but only for large LOCA scenarios. A more encompassing (but still screening level of effort) evaluation was conducted as part of the NRC review of the industry responses to GL-97-04 [SEA97-3705]. The risk significance was explored by examining the effect of recirculation cooling unavailability with regard to its impact on CDF for various BWR and PWR accident classes. Because CDF predictions varied substantially from one plant evaluation to the next, even for plants of similar design, generic failure data was used to quantify accident class scenarios and thereby estimate generic impacts on CDF. CDFs were estimated for

## Overview of BWR Issue

individual accident classes that credited or did not credit the availability of recirculation cooling. Every effort has been made to generate results that reflect generic (typical) plants. Note that these results are limited to internal events (including internal flooding).

There are a number of considerations involved in estimating the contribution of ECCS NPSH loss to CDF. More important considerations include: 1) LOCA frequency, 2) ECCS NPSH loss probability, 3) the operator recognition of NPSH loss, 4) availability of backflushing, alternate means of providing reactor core cooling, 5) containment protection, 6) accident sequence timing, and 7) other operator recovery actions. The results of these surveys are summarized in Tables 1-3.

The results indicate that the unavailability of recirculation core cooling in BWRs would increase the baseline aggregate CDF values from the E-05/yr range to the E-03/yr range (a factor of 200 higher). The accident classes having their CDF values most affected by recirculation cooling unavailability are the LOCA and transient accident classes. While in some cases BWR LOCAs can be mitigated with injection from external water sources, timing considerations make it difficult to connect external water sources quickly enough to mitigate the larger break sizes. Thus, recirculation cooling has a very important role in mitigating LOCAs. While external water sources can also be used as a backup method of mitigating many types of BWR transient accidents, recirculation cooling would be the preferred method given depletion of the HPCI/RCIC CST supplies. Because the CDF calculations for BWR LOCAs and transients rely so heavily on credit for recirculation cooling, removal of credit for recirculation cooling has a major impact on these accident class CDF values. Table 1-3 indicates that unavailability of recirculation core cooling increases the baseline CDF values for the BWR LOCA and transient accident classes by more than an order of magnitude. Specifically, the small/medium LOCA CDF increases from 2E-06/yr to 3E-04/yr, and the transient CDF increases from 1E-05/yr to 4E-03/yr.

The CDFs for the remaining three BWR accident classes, station blackout, ATWS, and ISLOCA, are affected to a lesser extent if recirculation cooling is unavailable. In station blackout, there is a very good chance that electrical power will be recovered before CST inventory depletion occurs, thus avoiding recirculation cooling. Plant procedures are typically written so as to preserve CST inventory during station blackout by instructing operators to initially align HPCI to the suppression pool as a water source. This action extends the plant coping time, because use of the CST inventory is delayed until suppression pool conditions (generally high temperature) prevent HPCI pump suction from the pool. For ATWS conditions, feedwater can be used as an injection source. ISLOCA conditions generally involve discharge of coolant outside the primary containment structure; with the result that recirculation is not a viable method of long-term cooling. ISLOCA conditions can be mitigated with the injection of water from various external sources, such as RHR service water and firewater.

The impact of the unavailability of recirculation core cooling is shown again in Table 1-4, where the CDF is proportioned by accident classification. As shown, ~92.3% of the expected CDF was correlated with transient scenarios and ~7.4% with LOCA scenarios. The CDF of all other accident classes was much smaller. It is interesting to note that large LOCA, which are generally selected for analysis in strainer blockage evaluations, contributed only ~0.5% to the CDF predicted in these surveys, largely due to its relatively low initiating event frequency.

## Overview of BWR Issue

**Table 1-3. Impact of Recirculation Core Cooling on Typical Internal-Event BWR CDFs**

Accident Class	CDF Crediting Recirculation Core Cooling Available (1/yr)	CDF Not-Crediting Recirculation Core Cooling Available (1/yr)	Ratio of Not-Crediting to Crediting Recirculation Core Cooling Available
LOCA - Large	2E-07	2E-05	100
LOCA - Small & Medium	2E-06	3E-04	150
Transient	1E-05	4E-03	400
Station Blackout	1E-05	2.2E-5	2.2
ATWS	1E-06	2.3E-6	2.3
ISLOCA	2E-08	3E-08	1.5
Total	2.3E-05	4.4E-03	190

**Table 1-4. Distribution of Expected Risk Associated When Recirculation Core Cooling is Unavailable**

Accident Sequence Type	Percentage of Total Expected CDF with Recirculation Core Cooling Unavailable
LOCA - Large	0.5%
LOCA - Small/Medium	6.9%
Transient	92.3%
Other	0.3%

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# **NRC Sponsored Research**

## **2.0 NRC SPONSORED RESEARCH**

The NRC sponsored research to evaluate the adequacy of existing suction strainer designs in U.S. BWR plants. This research included a number of NRC sponsored small-scale tests, analytical studies, NRC review of U.S. industry sponsored tests, and NRC review of tests sponsored and conducted by European countries. This research provided the database needed to aid the resolution of the strainer blockage issue.

### **2.1 NRC Sponsored Testing**

The NRC sponsored small-scale tests included:

- Tests designed to measure the pressure drops across combined fibrous/particulate debris beds and the filtration efficiency of the beds under a variety of test conditions (see NUREG/CR-6367).
- Tests designed to examine the debris mixing, debris fragmentation, and resuspension of debris from the suppression pool floor during the highly turbulent period immediately following a postulated LOCA and debris sedimentation within a suppression pool during the subsequent quiescent period (see NUREG/CR-6368).
- Tests designed to examine the transport and capture characteristics of debris within a drywell by steam and water depressurization flows (see NUREG/CR-6369).
- Tests designed to examine the transport and erosion characteristics of debris within a drywell by water washdown flows (see NUREG/CR-6369).
- Tests designed to examine the generation of RMI debris and the strainer head loss associated with RMI debris (see SEA-95-970-01-A:2).

The tests involving fibrous debris are discussed first in Section 2.1.1 followed by tests involving RMI debris in Section 2.1.2.

#### **2.1.1 Fibrous Debris Testing**

##### **2.1.1.1 Fibrous Bed Filtration and Head Loss Tests**

The accumulation of debris on a pump suction strainer would resist water flow, thereby lowering the pressure inside the strainer. When fibrous debris accumulates on a flat plate or cone-shaped strainer, the debris tends to form an essentially uniform layer across the strainer surface. This layer, referred to as a debris bed, can then filter other debris (e.g. particulates like dirt, dust, corrosion products, etc.) that would ordinarily pass through the holes of the strainer, as was demonstrated by the events at Perry. At Perry, fibrous debris combined with corrosion products that were present in the suppression pool (sludge), thereby exacerbating the problem (i.e., significantly higher head loss than would previously been expected.) The NRC sponsored experiments designed to quantify the effect of particulate debris on the head loss across the fibrous debris bed, and the filtration efficiencies of the fibrous beds to filter and trap micron range sludge particles. Alden Research Laboratory (ARL) conducted these tests.

#### **Test Objective**

The primary focus was to obtain the required experimental data needed to validate the NRC reference plant fiber/sludge head loss correlation and to derive supporting models specifically applicable to

## **NRC Sponsored Research**

analyzing the potential for strainer blockage in the reference plant analysis. Because the insulation used to insulate the primary system piping in the reference plant consisted predominantly of NUKON™ mats, the fibrous debris beds would be formed by the accumulation of NUKON™ insulation fragments. The particulate debris had the characteristics of sludge removed suppression pools of nuclear power plants. Previous studies and data were reviewed to guide the test apparatus design and the development of test procedures.

### **Test Apparatus and Instrumentation**

The test apparatus was primarily designed and instrumented to obtain head loss data. The test apparatus, shown in Figure 2-1, consisted of a closed loop where the same water was repeatedly forced through the strainer. A relatively uniform velocity profile at the strainer was achieved by implementing a long vertical 12-inch diameter pipe test section. The upstream approach to the strainer was 11-ft long and the downstream portion was another 4.5-ft in length. The remaining loop piping was constructed of 4-inch piping to keep flow velocities high enough to minimize debris settling within the horizontal portions of the loop. Resistance heating was used to maintain water temperature and the piping was insulated to minimize heat loss.

Debris introduced into the loop accumulated on the strainer. Debris beds consisted of fibers only or fibers intermixed with particulate debris depending upon test conditions. Particulate debris was filtered by the accumulated fibrous debris on the strainer, however a portion of the particles always passed through the fibrous bed to circulate the loop again. Therefore, the accumulation of particulate debris on the strainer was determined by measuring the particulate added to the loop and the subsequent concentration within the loop at the time of head loss measurement.

Because the flow velocity approaching typical semi-conical shaped BWR strainer is fairly uniform, a flat plate strainer was deemed adequate for the test apparatus. Note that the approach velocity for advanced strainer designs utilized in the resolution of the strainer blockage issue may not be uniform. The test strainer was constructed from 14-gauge stainless steel plate perforated with 1/8-inch holes with a density of 30 holes per square inch.

### **Test Data**

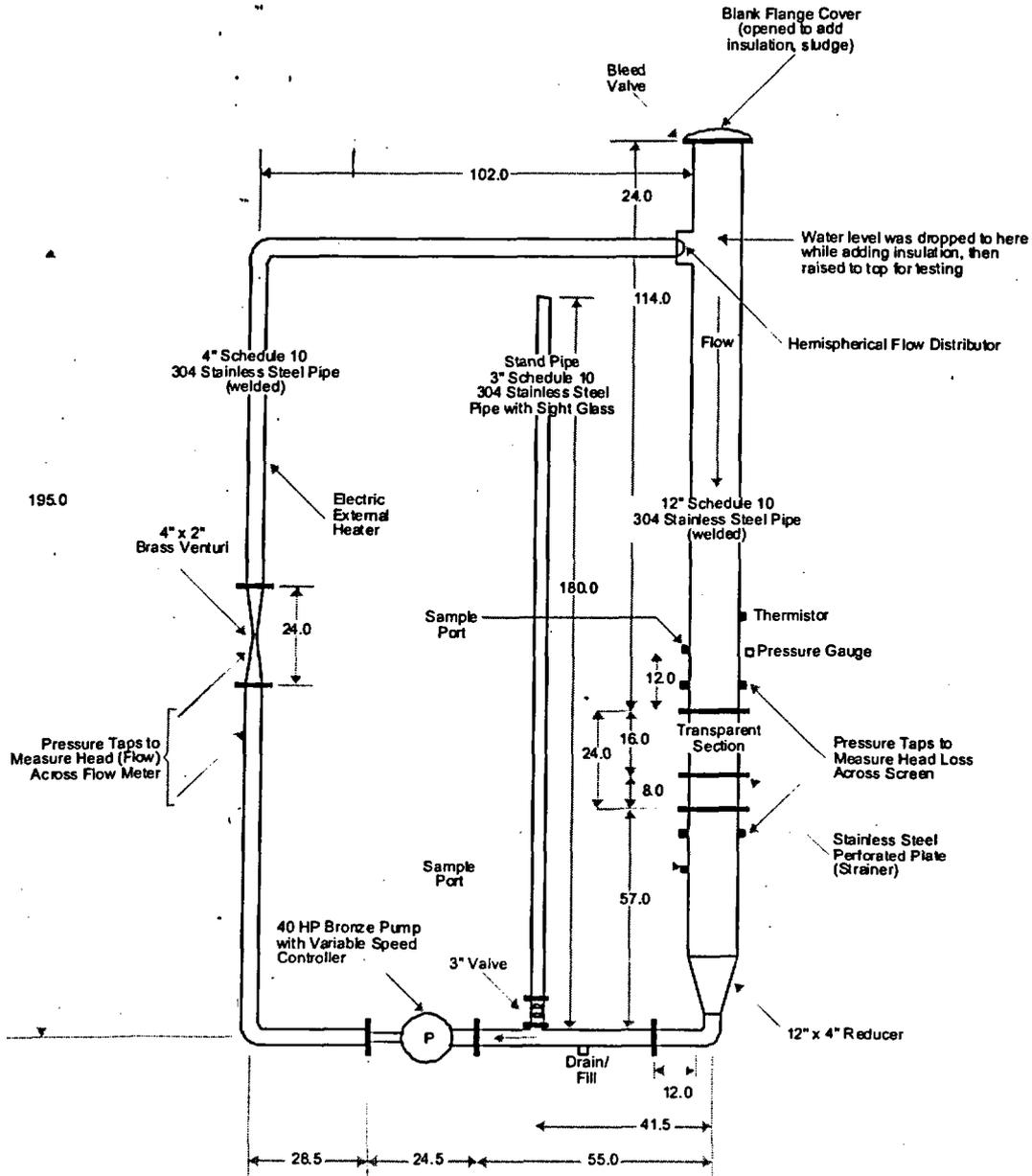
Fifty-two parametric tests were conducted that examined a variety of test conditions. The test parameters included:

- The thickness of the bed of debris.
- The flow velocity of the approaching water.
- The temperature of the water.
- The relative mixtures of particulate to fiber debris masses on the strainer.
- The size distribution of the fibrous and particulate debris forming the debris bed.

The development of the debris bed on the strainers surface (deposition morphology) was examined both macroscopically and microscopically using a scanning electron micrograph (SEM). The thickness of the bed depended primarily upon the quantity of fibrous debris introduced into the test loop. The accumulated particulate was interspersed among the bed fibers. Three mixtures of sludge were examined:

## NRC Sponsored Research

Sludge A, Sludge B, and Mix A. Sludge A approximated sludge actually removed from suppression pools. Sludge B provided an alternate set of data to determine head loss sensitivity to particulate characteristics. The Mix A simulant, consisting of 10% by weight of paint-chips and 90% by weight of Sludge A, was used to the impact of paint-chips on head loss.



**Figure 2-1. Flow Loop of Head Loss Test Apparatus**

Head losses across the strainer were measured and the particulate content of the bed estimated at times of stable values. An example, head loss is shown in Figure 2-2 where the head loss is compared to the approach velocity as the loop flow rate was incrementally increased during the test.

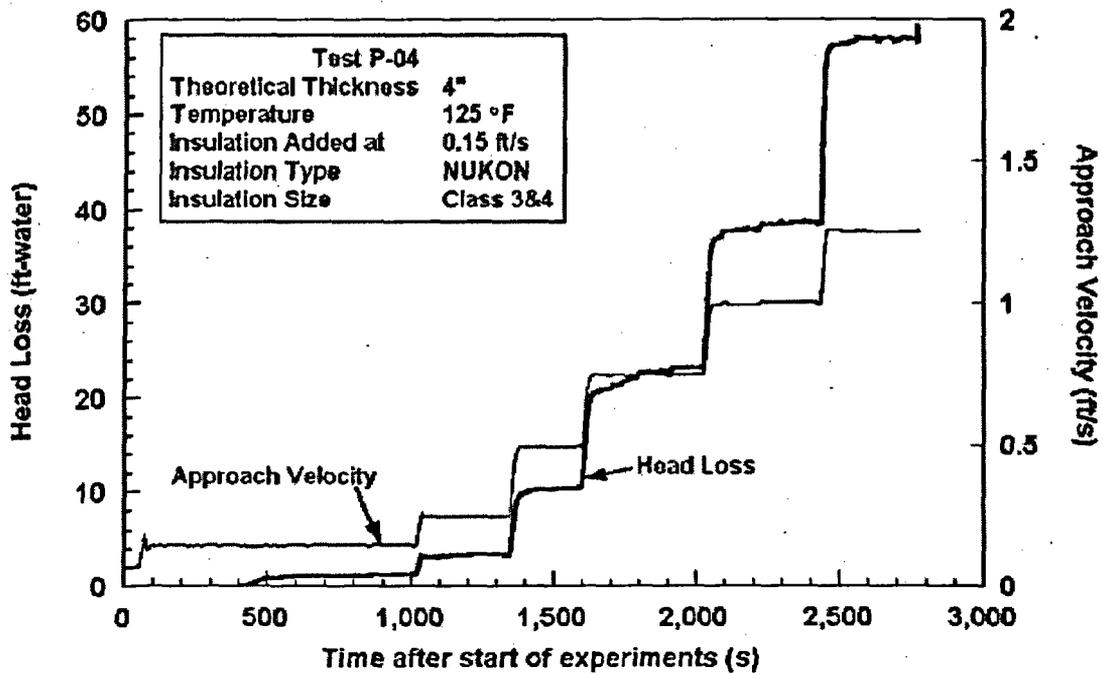


Figure 2-2. Typical Transient Head Loss for a Pure Fiber Bed

Within the ranges of tested parameters, the test data exhibited the following trends:

- The debris beds were compressible under the influence of head loss resulting from flow through the bed. Visual observations suggest that the compaction was higher for pure fiber beds than for beds containing significant particulate. The approach velocity did not significantly affect the formation of the bed and once the bed was compacted, it did not fully recover its original state after loop flow ceased. For mixed beds, the sludge particles were primarily intermixed with the fibers, leading to the formation of random mixed beds.
- The size of the pieces of fibrous debris (two class sizes tested) did not appear to significantly affect the head loss. Note that there was minimal structural difference between these two class sizes tested. There was some indication that beds formed of very small pieces of debris might induce larger head losses.
- Water temperature significantly affected the head loss. Specifically, head loss decreased as the water temperature increased, most likely due to the associated decrease in water viscosity.
- Particulate debris significantly increased the head loss across the debris bed. In some cases, the head loss increased by a factor of 100 with a mass ratio of sludge-to-fiber ratio equal to 10. Head loss differences among Sludge A, Sludge B, and Mix-A appeared to be marginal.
- The head loss was sensitive to the method by which sludge and fibrous debris were introduced into the test loop. Therefore, tests were conducted in a manner that simulated as closely as reasonably possible the actual conditions that prevail in a BWR suppression pool.

## **NRC Sponsored Research**

- Debris filtration efficiencies were estimated for the 'first flushing cycle' of the loop. Once-through filtration efficiencies typically ranged from 20 to 50% for the range of parameters tested. The efficiencies were weakly dependent upon the approach velocity and the fiber bed thickness. These values should be used within the tested ranges. It was noted that thin fiber beds (< 0.25-inches) would filter much less efficiently. Cumulative filtration, i.e., multiple loop flushing cycles, increased to a range of 50 to 90% and was found to be a strong function of the bed thickness.

As previously stated, a primary objective of the head loss tests was to obtain data to validate an appropriate head loss correlation, specifically the semi-theoretical head loss correlation used in the reference plant study. This correlation, equally applicable for both pure fiber beds and mixed beds, was found to predict head loss data within an acceptable accuracy range for test conditions where the beds were reasonably uniform.

### **Documentation**

A complete description of these tests, i.e., test apparatus, test procedures, and test data, was summarized in Appendix E of NUREG/CR-6224 and documented in detail in NUREG/CR-6367, "Experimental Study of Head Loss and Filtration for LOCA Debris," 1995.

#### **2.1.1.2 Fibrous Debris Suppression Pool Sedimentation Tests**

The BWR suppression pool following a postulated LOCA would experience a range of turbulence conditions. Specifically, a high level of turbulence immediately following the LOCA, a transition period, and then the longer-term relatively quiescent period once primary system depressurization is completed. During the period of high turbulence, debris transported from the drywell to the suppression pool would undergo mixing and potential fragmentation during the period of high turbulence. In addition, any debris previously located on the suppression pool floor would likely be resuspended. During the quiescent period, debris would gradually settle to the suppression pool floor. These phenomena govern the transport of debris within the suppression pool thereby determining the type, quantity, and form of debris deposited onto the strainers. The NRC sponsored tests conducted in a reduced scale suppression pool test facility to study these debris behaviors. ARL conducted these tests. The fibrous debris sedimentation tests are discussed in this section and the RMI debris sedimentation tests are discussed in Section 2.1.2.2.

### **Test Objective**

The overall purpose of the suppression pool tests was to provide insights into debris transport within a suppression pool following a LOCA. However, the underlying processes are too complex to be addressed by a single set of experiments. Based on scoping studies and discussions with experts in related fields, the phenomena selected for further study were:

- Debris transport and sedimentation within the suppression pool during the high-energy phase that would immediately follow a medium loss of coolant accident (MLOCA).
- Debris transport and sedimentation within the suppression pool during the post high-energy phase.

Note that the high-energy downcomer oscillations for a LLOCA would be initially driven by condensations oscillations for a relatively short period of time (about 30 s) and then be followed by

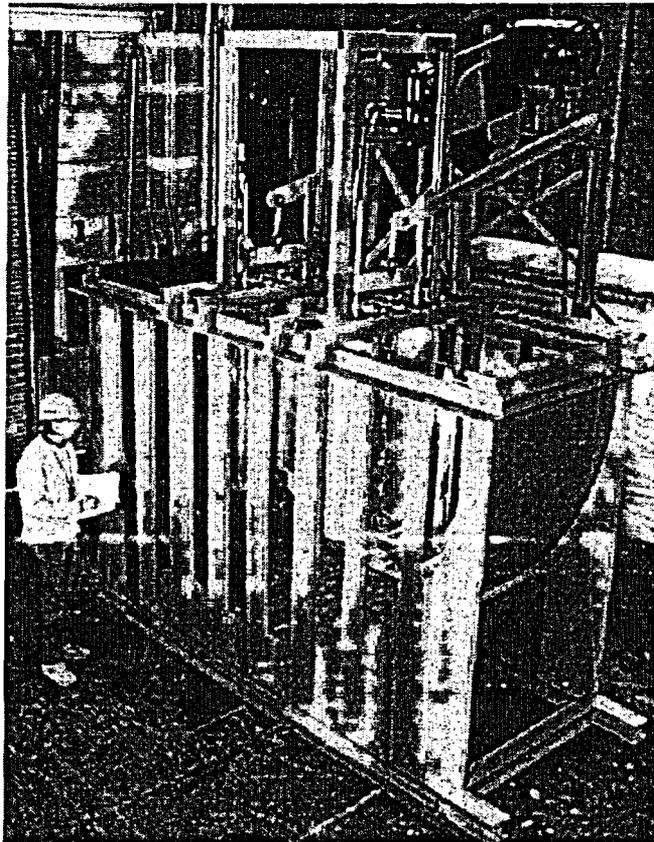
## NRC Sponsored Research

chugging for the remainder of the blowdown phase. Because the condensation phase would be relatively short and more difficult to simulate experimentally, these tests focused on the chugging phase.

The primary focus was to obtain debris settling velocity data to support analytical evaluations, specifically analyses applicable to analyzing the potential for strainer blockage in the reference plant analysis. Because the insulation used to insulate primary system piping in the reference plant consisted predominantly of NUKON™ mats, the debris beds formed on the reference plant strainers were then expected to consist of primarily accumulated fragments of NUKON™ insulation with particulate debris embedded within its fibers. Therefore, NUKON™ debris and particulate debris with the characteristics of suppression pool sludge were used in these tests.

### Test Apparatus and Instrumentation

A water tank designed to simulate a segment of a Mark I BWR suppression pool was constructed of steel with the appropriate lower curvature. The tank sidewalls of the segment were made of Plexiglas to provide complete visibility of the debris in motion. Turbulent chugging associated with steam-water oscillations (condensation oscillations) during the depressurization of the primary system was simulated in these tests by including four 10-inch (0.25 m) diameter downcomers fitted with pistons. One of the downcomers was constructed of Plexiglas to facilitate visualization of debris transport. The test apparatus is shown in Figure 2-3.



*Figure 2-3. Suppression Pool Sedimentation Test Apparatus*

## NRC Sponsored Research

The geometric scale of the tank was 1 to 2.4 and the radius of the test tank was 13.5-ft (4.11 m). The spacing between the downcomers and their clearance with respect to the floor were also scaled. The front and back walls were spaced one half the distance to the next pair of downcomers in either direction. Hence, the water volume of the tank per downcomer was scaled to the volume per downcomer of a typical BWR Mark I suppression pool.

The pool dynamic conditions associated with the high-energy phase of a MLOCA are usually referred to as chugging. Chugging occurs when water reenters the downcomers, as a result of decreasing steam flow, thereby condensing steam. The build up of non-condensable gases subsequently would push the water from the downcomers until sufficient non-condensable gasses escapes the downcomers to initiate another cycle. Energy input to the suppression pool during chugging was based on data obtained by General Electric (GE) in a full-scale test of a Mark I containment at their full-scale test facility (FSTF) [NEDE-24539-P]. Two types of chugging behavior were observed in test data for a MLOCA, these were:

- Type 1 where the neighboring downcomers oscillated in phase, i.e., oscillations were synchronized.
- Type 2 where the oscillations were relatively unsynchronized.

Because Type 1 chugging was deemed more prototypical of MLOCA, only Type 1 was studied in these tests. All downcomer pistons oscillated in phase to simulate Type 1 chugging. For several Type 1 chugs, the FSTF tests provided pressures measurements within a downcomer. Because GE did not directly measure the actual kinetic energy imparted to the suppression pool during each chug, an analytical model was devised to deduce the energy from the measured chugging pressures. This model was then used to estimate both the chugging period of downcomer oscillation and its amplitude of two-phase level movement. Since the dynamics of chugging changed continuously during primary system depressurization, the period and amplitude was estimated for initial, middle, and later stages of chugging. Further, these estimates were modified to reflect scaling considerations.

The test facility included a series of sampling ports to allow sampling debris concentrations at five equally spaced vertical locations at the center of the tank. The samples were filtered, dried, and weighed so that the concentrations could be expressed as the mass of debris per unit mass of water. A debris classification system was devised that classified pieces of debris into seven classifications. These are illustrated and described in Figure 2-4.

### Test Data

Fourteen parametric tests were conducted to examine a variety of test conditions. The test parameters included:

- The type, form, and quantity of insulation debris tested.
- The quantity of sludge tested.
- The period and amplitude of the downcomer piston chugging.

Within the ranges of tested parameters, the data exhibited the following trends:

## NRC Sponsored Research

Class No.	Description	Settling Characteristics	Settling Velocity in Calm Pools	Strainer Filtration Efficiency
1	 Very small pieces of fiberglass material, "microscopic" fines which appear to be cylinders of varying L/D.	Drag equations for cylinders are well known, should be able to calculate fall velocity of a tumbling cylinder in still water.	1-3.5 mm/s Based on Cal. for 0.5 - 2.54 cm long fibers	Unknown
2	 Single flexible strand of fiberglass, essentially acts as a suspended strand.	Difficult to calculate drag forces due to changing orientation of flexible strand.	Same as above	Nearly 1.0
3	 Multiple attached or interwoven strands that exhibit considerable flexibility and which due to random orientations induced by turbulence drag could result in low fall velocities.	This category is suggested since this class of fibrous debris would likely be most susceptible to re-entrainment in the recirculation phase if turbulence and/or wave velocity interaction becomes significant.	0.04 ft/s - 0.06 ft/s (measured)	1.0 (measured)
4	 Formation of fibers into clusters which have more rigidity and which react to drag forces more as a semi-rigid body.	This category might be represented by the smallest debris size characterized by PCI air blast experiments.	0.08 - 0.13 ft/s (measured)	1.0 (measured)
5	 Clumps of fibrous debris which have been noted to sink. Generated by different methods by various experimenters.	This category was characterized by the PCI air test experiments as comprising the largest two sizes in a three size distribution.	0.13 - 0.18 ft/s (measured)	1.0 (measured)
6	 Larger clumps of fibers. Forms an intermediate between Classes 5 and 7.	Few of the pieces generated in PCI air blast tests consisted of these debris types.	0.16 - 0.19 ft/s (measured)	1.0 (measured)
7	 Precut pieces (i.e. .25" by .25") to simulate small debris. Other manual/mechanical methods to produce test debris.	Dry form geometry known, will ingest water, should be able to scope fall velocities in still water assuming various geometries.	* 0.25 ft/s (calculated)	1.0 (estimated)

**Figure 2-4. Fibrous Debris Classifications**

- Both the fibrous and particulate debris remained fully mixed in the tank during simulated chugging at all energies tested resulting in uniform vertical concentration profiles.
- Turbulence resuspended debris initially deposited onto the suppression pool floor during simulated chugging at all energies tested.
- Fibrous debris underwent further fragmentation into smaller sizes, including individual fibers, at all energies tested. In general, the fragmentation occurred near the downcomers where the fibrous debris was subjected to cyclic shear forces from the downward jet and ingestion into the downcomer.
- Visual observations suggested that the turbulence decays within a few minutes after termination of chugging simulation, thus enabling post-high energy phase debris settling. In the post-high energy phase, the vertical concentration profiles were slightly non-uniform. Ranges of settling velocities in calm pools (terminal velocity) are listed in Figure 2-4 for each debris size classification. The terminal settling velocity for fibrous debris is shown in Figure 25 as a function of debris weight.

- Measured concentrations showed that fibrous debris settled slower than the sludge, and that the settling behavior of each material is independent of the presence of the other material.

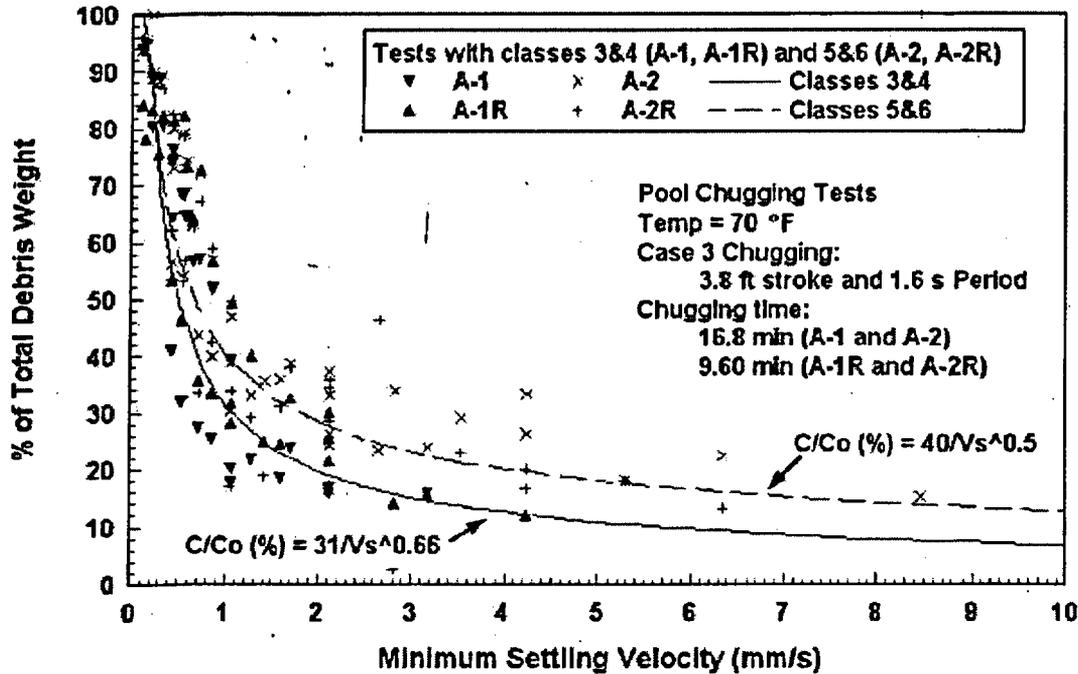


Figure 2-5. Fibrous Debris Terminal Settling Velocities

These results were deemed equally valid for other phases of accident progression and other sizes of LOCAs. These tests showed that the assumption of considering uniform debris concentration during strainer calculations is reasonable. However, it must be noted that the continuous operation of the recirculation ECC and the RHR systems in an actual BWR would add additional turbulence to the pool and that this type of turbulence was not considered in these tests. Therefore, applying these data to an actual plant analysis will require engineering judgment.

**Documentation**

A complete description of these tests, i.e., test apparatus, test procedures, and test data, was summarized in Appendix E of NUREG/CR-6224 and documented in detail in NUREG/CR-6368, "Experimental Investigation of Sedimentation of LOCA-Generated Fibrous Debris and Sludge in BWR Suppression Pools," 1995.

**2.1.1.3 Separate Effects Fibrous Insulation Debris Transport/Capture Tests**

A postulated LOCA in a BWR whose primary piping is insulated with fibrous insulation would generate fibrous debris in a region close to the broken pipe. These insulation fragments, ranging in size from small fragments to partially damaged blankets, would be entrained by the fluid flow from the break (depressurization flow) and carried through the drywell to the suppression pool. For a main steam line break (MSLB), the debris would be carried primarily by high velocity steam. For a recirculation line break (RLB), a mixture of steam and water would carry the debris. Because a BWR drywell is congested with numerous structural elements (e.g., pipes, gratings, I-beams, and vents) debris transport through the

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drywell would be impeded. Debris impacting a structure could remain stuck (captured) on that structure. Surface wetting resulting from steam condensation enhances the efficiency of capture substantially. If debris remains attached to a structure, it will not be transported to a strainer. A series of tests were conducted to obtain a basic understanding of fibrous insulation debris capture on typical BWR drywell structures due to inertial capture. ARL conducted these tests.

### Test Objective

The primary objective of these tests was to provide a basic understanding related to inertial capture of small insulation debris generated by a postulated MSLB. The tests were designed to examine: 1) the role of debris inertia on the capture of debris on typical drywell structures during airborne transport, and 2) the impact of surface wetness on the retention of debris by impacted surfaces. A number of different structures were tested to examine the effects of shape and orientation relative to the direction of flow.

A secondary test objective was to study possible degradation and erosion mechanisms for large pieces during blowdown. Specifically, floor gratings will capture large debris that would then be subjected to high velocity steam flow intermixed with water droplets, thereby potentially further degrading the debris pieces.

### Test Apparatus and Instrumentation

A once-through flow tunnel was constructed of plywood panels with a blower at the upstream end and an air filtering plenum downstream of the test section. The primary test section had a cross section with inner dimensions of 4-ft by 4-ft and a length of 8-ft. Because airflow velocities within this test section were limited to about 50 ft/s, a smaller 2-ft by 2-ft test section was inserted within the larger test section in selected tests to achieve velocities up to 150 ft/s. The length of the smaller test section was 5-ft. The test apparatus is illustrated in Figure 2-6.

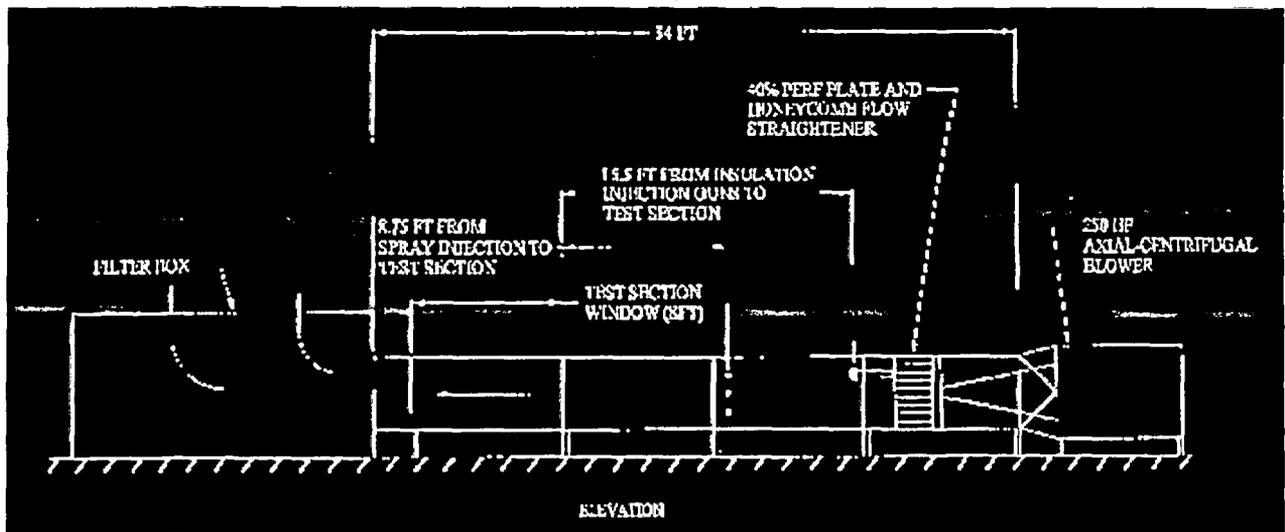


Figure 2-6. Separate Effects Insulation Debris Transport/Capture Test Apparatus

Perforated plates and a honeycomb structure were used to achieve a uniform velocity distribution. In addition, the head loss across this flow conditioning device was calibrated with respect to tunnel velocities and later used to establish specified test section velocities.

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Test obstructions consisted of single members and combinations of individual members. Single member tests involved mounting one or two objects side by side within the test tunnel with the objects being the same type, having identical cross sections, and being similarly aligned to the flow. In combined member tests, combinations of members (one or more shapes) were mounted with different orientations, i.e., different alignments to the flow, and positioned so that front-mounted members sometimes shielded rear-mounted members. Thus, the effects of member proximity wake effects, and shielding was evaluated. The individual components include I-beams, gratings, pipes, and a vent cover.

Obstruction surfaces were wetted in most tests by means of spray injection nozzles located upstream of the test section. The duration of the spray controlled the extent of surface wetness (either 10 or 30 seconds). Most tests were conducted with a 10 second pre-wet time.

The fibrous insulation debris was injected into the tunnel through a rupture disk capping one end of each of two pressurized 4-inch PVC pipe. The pipes sections were suspended from the tunnel ceiling downstream of the flow conditioning structure and filled with pre-shredded insulation. Air was pumped into the pipe until the rupture disk failed so that the jet of escaping air dispersed the insulation debris. The fibrous insulation debris was generated from heat-treated NUKON™ base wool blankets.

### Test Data

Forty-eight tests were conducted to examine a variety of test conditions. The test parameters included:

- The flow velocity (24-150 ft/s).
- The wetness of structure surfaces (dry to draining water film conditions).
- The type of structure (I-beams, piping, gratings, and Mark II vents).
- The approximate debris size.
- The debris loading (6.3 to 12.5 gm/ft<sup>2</sup>).

Within the ranges of tested parameters, the test data exhibited the following trends:

- Gratings captured more fibrous insulation debris than other types of structures. For example, in combination member tests where the grating was placed downstream of other structures, i.e., pipes and I-beams, the grating captured substantially more debris than all other upstream structures combined.
- Surface wetness clearly influenced the extent of debris capture on structures, especially for pipes and I-beams. When pipes and I-beams were dry, these surfaces essentially did not capture debris. Floor gratings capture were affected by wetness but were less sensitive to the degree of wetness. Typical debris capture by a wetted pipe is shown in Figure 2-7.
- Tests with dual gratings in series showed substantially more debris capture on the upstream grating (averaging about 25%) than the downstream grating (about 12%), most likely because the largest debris was removed from the flow stream by the upstream grating. Note that capture percentages reflect the fraction of the mass of debris approaching a particular structure that was subsequently captured by that structure.

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- Mark II vents with wetted surfaces captured about 12% of small debris on the cover plate and the simulated drywell floor.
- Break up or disintegration of debris captured on a grating was negligible when 6-inch by 6-inch thin pieces (1/8 to 1/2-in thick) of insulation were subjected to gas velocities approaching 140 ft/s.
- Gravitational settling (i.e., debris settling to the tunnel floor) was negligible for all tests except the Mark II vent geometry (settling was not included in the vent capture percentage).

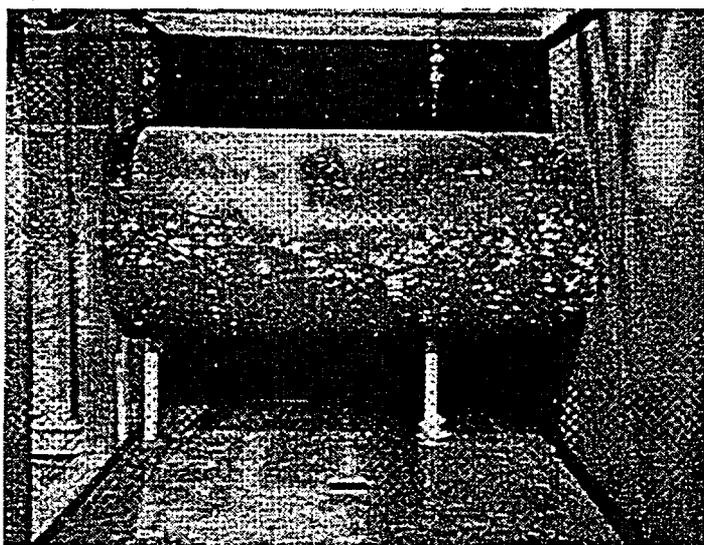


Figure 2-7. Typical Debris Capture by a Wetted Pipe

### Documentation

A complete description of these tests, i.e., test apparatus, test procedures, and test data, was documented in detail in Section 2 of NUREG/CR-6369, Volume 2. The report includes a number of photos showing debris captured on the surfaces of obstructions.

#### 2.1.1.4 Integrated Effects Fibrous Insulation Debris Transport/Capture Tests

While the separate effects tests described in Section 2.1.1.3 provided valuable data, the tests had notable limitations of: 1) relatively light debris loadings on the structures compared to expected BWR conditions, 2) modest assortment of debris sizes, 3) non-prototypical congestion of structures, and 4) overly simplified flow fields approaching the structures. The debris loading approaching a structure refers to the density of debris pieces per unit of cross-sectional flow area. The principal concern was that debris captured on a structure could be knocked free (reentrainment) by the impact of additional debris under conditions of heavy debris loading, thereby effectively reducing the capture efficiency for that structure. To ensure conservative estimates for debris capture, data was needed for heavier, more prototypical, debris loadings. Additional experiments of a more representative and integrated nature were performed to further understand the role of fibrous insulation debris inertial capture within a BWR drywell.

### Test Objective

The primary objective of these tests was to provide integrated debris capture data to benchmark analytical models and methods used to predict debris transport within a BWR drywell. These tests were designed to minimize the limitations noted for the separate effects tests. These tests combined debris generation with debris transport. The insulation blankets were mounted and restrained in a manner designed to maximize their destruction, and therefore, maximize the amount of debris impacting the structures. Debris sizes ranged from individual fibers to partially intact blankets. The structures for debris capture were more complex and more prototypical than those used in the separate effects testing. The flow patterns in the integrated testing were also more complex, (i.e., more three-dimensional), than for the separate effects testing. The data from these integrated tests were compared to the data from the separate effects tests to look for insights regarding the effects of complex structural arrangements and fluid flows on debris capture.

### Test Apparatus and Instrumentation

The integrated debris transport tests were conducted at the Colorado Engineering Experiment Station Inc. (CEESI) air blast facility. The facility was capable of storing as much as 11,000 ft<sup>3</sup> of air at 2500 psia. In these tests, a dispersing 1100-psi air jet was used to destroy insulation blankets and then transport the debris through test chambers that contained obstructions.

The main test chamber, illustrated in Figure 2-8, consisted of a large horizontal cylinder with an inner diameter of 9.4-ft and a length of 93-ft. In addition, a 32-ft auxiliary chamber of the same diameter was attached with a flanged collar at the exit end of the main chamber in a horizontal "L" configuration. The upstream end of the main chamber (behind the air jet nozzle) was almost completely blocked so that only a small portion of the air could exit the chamber in the reverse direction. The purpose of the auxiliary chamber was to investigate debris capture associated with flows undergoing a change in direction; in this case a 90° bend.

Target insulation blankets were mounted a few feet downstream of the air jet nozzle. The blankets were mounted on a 12.75-inch outer-diameter pipe that extended across the main test chamber at mid height and positioned directly in front of the air jet nozzle. The target pipe mount was secured to rails so that the target could be positioned any distance from the jet out to 30-ft from the nozzle.

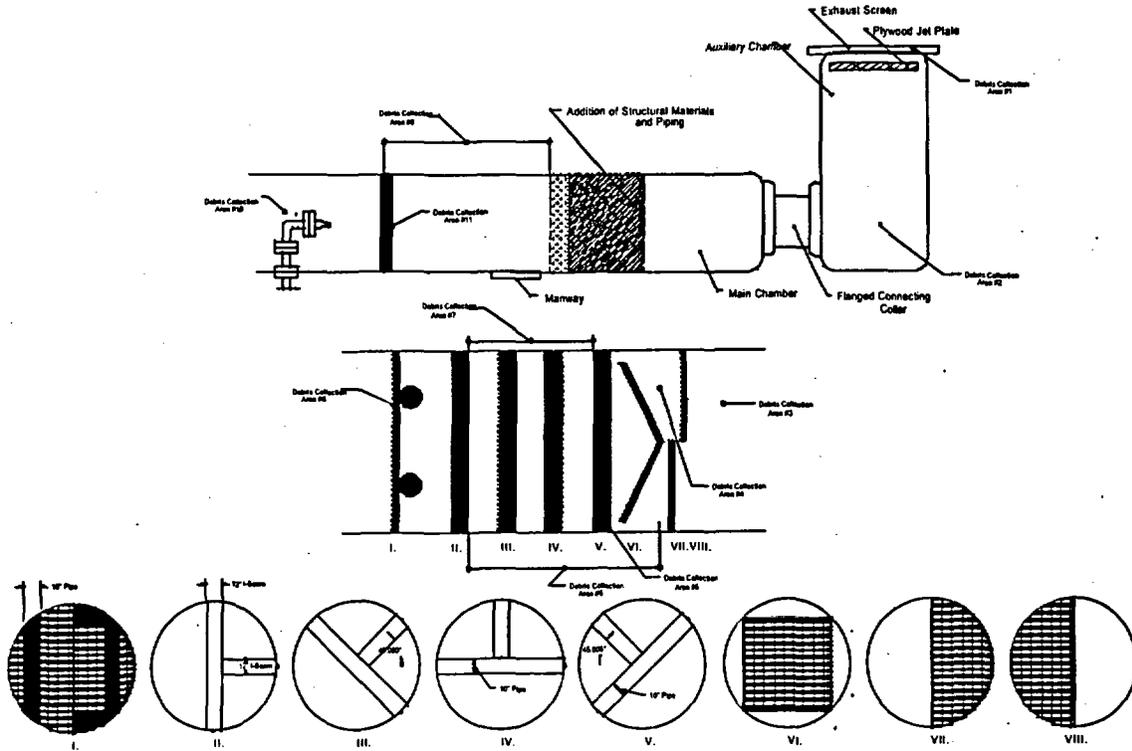
Transco manufactured the insulation blankets used, except for one test where a NUKON™ blanket was provided by Performance Contracting Inc. (PCI). The Transco blankets were 3 ft in length compared to 1.5 ft for the PCI blanket. Stainless steel bands (either 2 or 3) were placed around the blanket to hold the blanket in place but a metal jacket did not encapsulate the blankets.

The structural test section contained an assemblage of structural components (e.g., gratings, pipes, and I-beams) designed to simulate a prototypical section of a BWR drywell. The design focused on maintaining the same surface to volume ratios as found in BWR containments and, to the extent practical, the structures were oriented in a manner analogous to the orientations found in the actual plant conditions. These structural components are shown schematically in Figure 2-8.

All I-beams were 12 inches from upper to lower flange and all pipes were 10 inches in diameter. I-beams were oriented with their web into the direction of airflow. Starting from the front (flow entrance) of the structural test section, the test section contains the following structural subassemblies:

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- A continuous grating with two vertically oriented pipes directly behind,
- I-beams with a full length beam oriented vertically and a half beam oriented horizontally,
- I-beams with a full length beam oriented 45° from vertical,
- Horizontally oriented pipe with a half I-beam oriented vertically,
- Pipe oriented 45° from vertical,
- V shaped grating (approximately 56°) that obstructed about 57% of the total test chamber flow area.
- Two half section gratings separated axially by 22 inches, referred as the split grating.



**Figure 2-8. CEESI Air Jet Test Facility**

Surface wetness was shown in the separate effects tests to profoundly impact the capture efficiency of structures. Therefore, surface wetness was a primary concern in the integrated tests. Structures were pre-wet in the CEESI tests with misters positioned throughout the test section. The mister system, constructed from PVC pipe, sprayed warm water as fine droplets from a high-pressure (150 psig) source. The misting system was operated long enough (approximately 10 minutes) to form a draining water layer.

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The size of the jet nozzle was designed to minimize air usage while still allowing the jet to continue long enough for the debris generation and debris transport processes to complete (i.e., all debris was either deposited onto a surface or passed through the test chamber). The nozzle discharge was monitored and recorded. Developmental tests determined that at least 10 seconds was required for a 4-inch diameter nozzle and 12 seconds for 3-inch nozzle. Facility operators were able to approximate the jet duration time specified for a particular test. Air jet discharge was initiated using a rupture disk.

### Test Data

The developmental tests were instrumented with Pitot tubes to monitor and map the flow distributions before the flow entered the congested test section. The airflow velocities entering the area containing the congestion of structural components generally ranged from 25 to 50 ft/s. These velocities were in good agreement with velocities predicted for the tests using a commercially available CFD code. These velocities were also comparable to CFD predicted velocities for a typical BWR drywell. Once the flows dissipate into pressure-driven flows, BWR steam flow velocities were predicted to generally range from about 30 to 50 ft/s. Therefore, the airflow velocities in the CEESI tests were considered prototypical of steam flow velocities that would exist in a BWR drywell following a postulated LOCA.

Ten production tests were conducted that examined a variety of test conditions regarding debris transport. In addition, four of the developmental tests also provided useful debris transport data. The test parameters included:

- The nominal nozzle diameter, either 3 or 4-inches.
- The duration of the air jet flow (5 to 24 seconds).
- The surface wetness.
- The distance between the nozzle and the target.

Most of the tests were conducted using a nominal 4-inch diameter nozzle, flow duration of 12 to 17 seconds, and wet surfaces. One of debris transport tests (Test H7) was deliberately conducted with all surfaces maintained dry to illustrate the impact of surface wetness on debris capture. In addition, the mister system partially malfunctioned in two tests resulting in incomplete surface wetness and a subsequent reduction in debris capture.

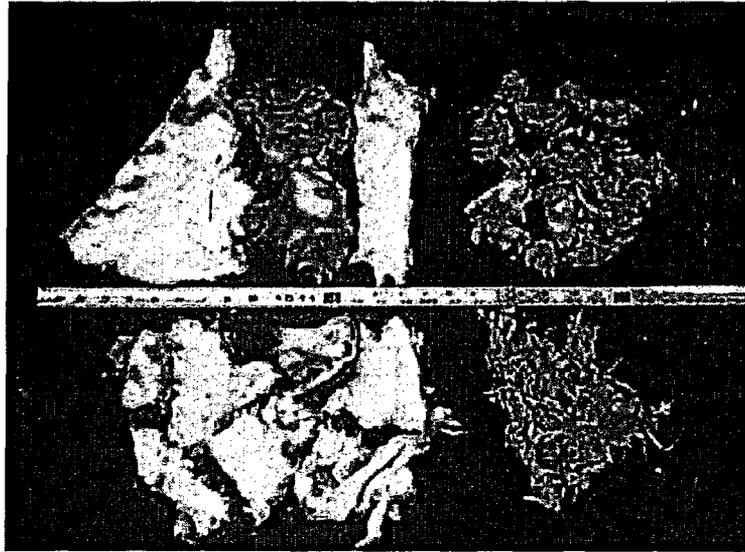
The distance between the nozzle and the target was initially adjusted until the optimum distance for maximum target destruction was found. A distance of ~120-inches (L/D of 30) appeared to maximize destruction. Insulation debris consisted of pieces of bare fiberglass insulation of various sizes, pieces of shredded canvas, agglomerated pieces containing both insulation and canvas, and large sections of the canvas cover that remained relatively intact and sometimes contained substantial quantities of insulation. The bare insulation was divided into three general size groups, i.e., large, medium, and small. Samples of debris pieces are shown in Figure 2-9.

The tests demonstrated the ability of structural components to capture debris. The average overall transport fraction for small debris in the CEESI was 33% of the total debris generated, i.e. ~2/3 of the generated debris was captured, primarily by inertial impaction, within the test facility.

Once again gratings were found to be the most effective debris catcher. The debris captured by the split grating in Test H2 is shown in Figure 2-10. Note that the upstream gratings had already captured the

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large debris. The capture efficiencies for the split grating and for each test are plotted in Figure 2-11 as a function of debris loading. The corresponding separate effects data is also shown. This figure clearly illustrated the impacts of surface wetness and debris loading and the general agreement between the separate and integrated effects tests.



*Figure 2-9. Samples of Debris Generated in the CEESI Tests*



*Figure 2-10. Typical Debris Deposition on a Grating in CEESI Tests*

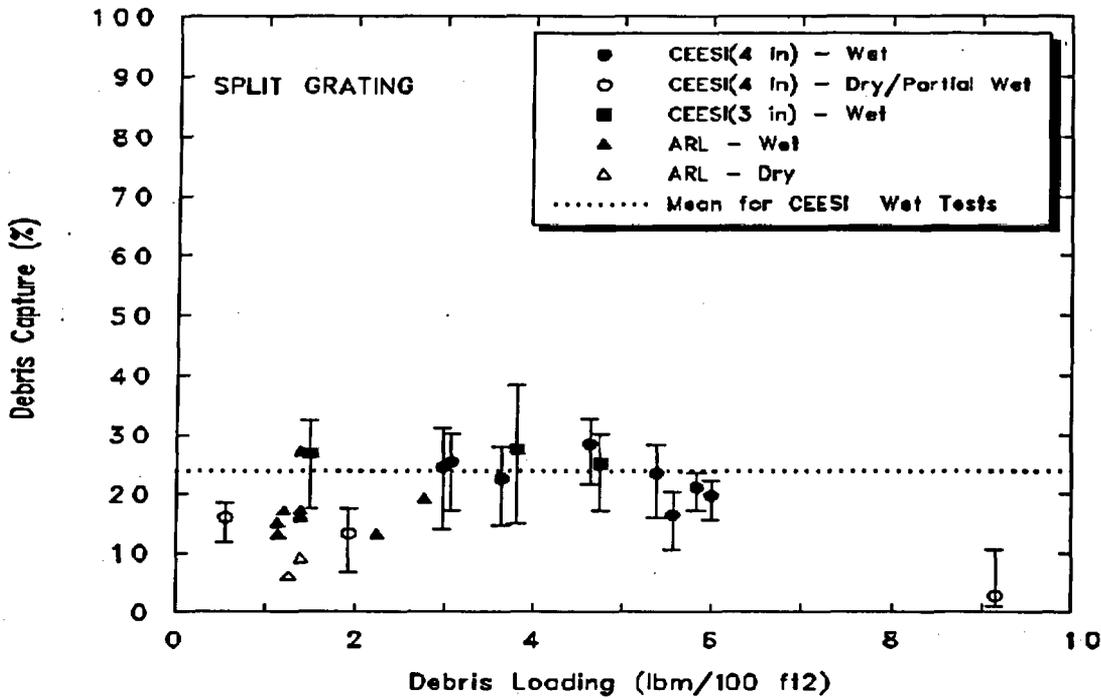


Figure 2-11. Capture of Small Debris by Grating

The average fractions of small debris captured by each test structure component are shown in Table 2-1. Note that the first continuous grating stopped almost all of the larger debris and that the capture fraction for the continuous grating was not obtained. This was due to the failure of the mister system to adequately wet the continuous grating (i.e., this grating illustrated dry behavior).

Table 2-1: Small Debris Capture Fractions

Structure Type	Debris Capture
I-Beams and Pipes (Prototypical Assembly)	9%
Gratings	
V Shaped Grating	28%
Split Grating	24%
90° Bend in Flow	17%

The 90° bend between the two chambers caused debris to be captured at the bend, which was maintained wet by a mister in the auxiliary chamber. 17% of the debris entering the auxiliary chamber was trapped on the chamber wall as a direct result of the bend. The I-beams and pipes captured a lesser amount, but still substantial.

The capture fractions were found to be relatively independent of the debris mass loading (i.e., lbm/ft<sup>2</sup>) impacting the structures. The integrated effects tests capture data were consistent with the separate effects tests data indicating that the finer aspects of the local flow fields (e.g., eddies and wake) do not significantly influence debris capture. The separate-effects tests and integrated-effects tests clearly

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established that a fraction of the small and large debris would be deposited as the debris transport through the drywell following a blowdown. The likely locations for the deposition in a BWR are the floor gratings located at different elevations. These captured pieces would potentially be subjected to subsequent washdown water flows.

### **Documentation**

A complete description of these tests, including, test apparatus, test procedures, and test data, is documented in detail in Section 3 of NUREG/CR-6369, Volume 2. The report includes a number of photos showing debris captured on the surfaces of obstructions.

#### **2.1.1.5 Fibrous Insulation Debris Washdown/Erosion Tests**

Debris captured on structures during the blowdown phase following a LOCA would subsequently be subject to transport and/or erosion by water flows from long-term recirculation cooling and containment sprays (washdown phase). The primary concern here is the erosion and waterborne transport of debris captured on a floor grating directly below the broken pipe. In this situation, the debris would be pummeled by recirculation water flow that would cascade down from the break to the drywell floor. Pieces of debris continually impacted by falling water could erode, allowing debris to pass through the grating and continue traveling toward the strainers. A series of tests were conducted at a facility operated by Science and Engineering Associates, Inc. (SEA) to examine the potential impact of washdown/erosion.

### **Test Objectives**

The primary objective was to obtain experimental data that could be used to estimate the extent and timing of erosion during the washdown phase that would occur to insulation captured by floor gratings. The tests were to study the erosion of fibrous debris of different sizes at a variety of flow rates with the objective of answering the following questions:

- What fraction of a piece of debris would erode and subsequently be transported to the drywell floor?
- Does the rate of erosion decrease with time, potentially reaching an asymptotic behavior?

### **Test Apparatus and Instrumentation**

These tests were conducted within a 5-ft long 2-ft by 2-ft vertical test chamber constructed of 0.5-inch clear polycarbonate to allow complete visualization of the tests. A schematic of the test apparatus is shown in Figure 2-12. An aluminum grating with 1-inch by 4-inch cells, characteristic of gratings used in BWR drywells was placed at the bottom of this test chamber to hold the pieces of debris. Water was pumped into the top of the test chamber. Three simulated pipes were positioned to break up the structure of the injected flow before the water reached the debris. The simulated pipes were constructed of Plexiglas and were 2-inches in diameter.

A 400-gallon tank was used as a water reservoir for recirculation purposes. A 250 GPM centrifugal pump pumped water from this tank to the top of the test chamber through a 4-inch diameter PVC pipe. A debris catcher of fine-mesh wire screen was installed below the test chamber to catch insulation debris and erosion products, thereby preventing their recirculation back into the test chamber. A second filter was

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fitted to the pump suction to guarantee complete filtration of the debris from the pump inlet flow. A valve in the PVC pipe controlled the flow and the flow rate was monitored by a calibrated flow meter.

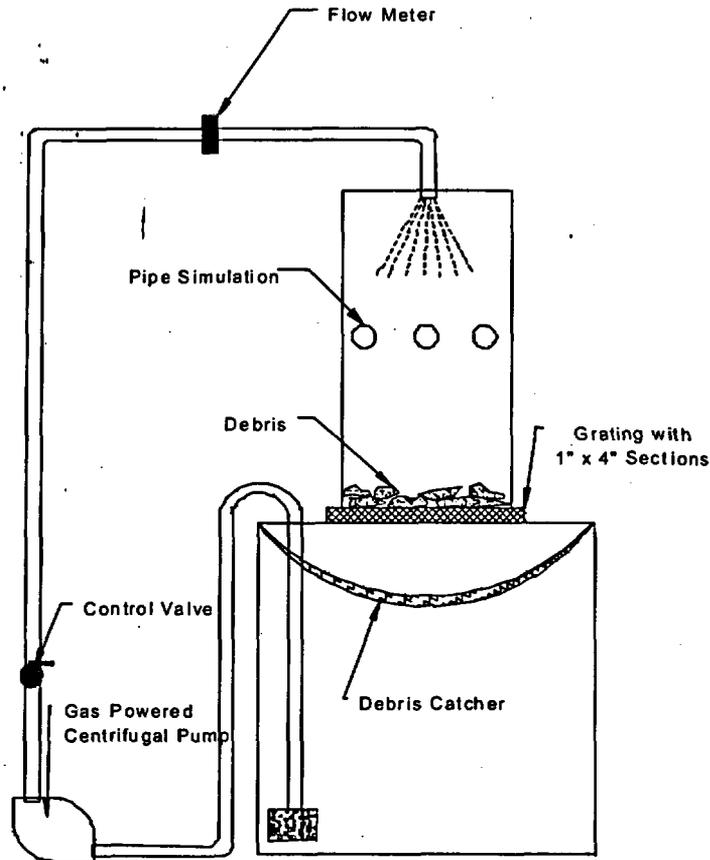


Figure 2-12. Schematic of Washdown Test Apparatus

The simulated pipes conditioned the flow entering at the top of the test chamber, i.e., the bulk flow was broken up in a prototypical fashion. In this manner, water impacting the debris was spread relatively uniformly across the test chamber. In tests simulating spray-induced washdown, a removable spray head was attached to the PVC outlet.

Debris of various sizes was placed on the gratings and pipes and subjected to water flow typical of containment spray nozzles and break flow. Tests were conducted with room temperature water using pieces of insulation generated by an air jet impingement.

### Test Data

Both the debris size and the water flow rate were varied to simulate washdown of small debris by containment sprays, as well as erosion and transport of large debris by break flows. Twenty-six parametric tests were conducted that examined a variety of test conditions. The test parameters included:

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- The water flow rate.
- The type of flow conditioning, i.e., with or without the removable spray head.
- The duration of the flow.
- The size and condition of the debris.
- The mass of debris.
- The thickness of the debris bed.

Low-density fiberglass insulation called Thermal Wrap™ manufactured by Transco Products, Inc. was tested. Four sizes of debris were tested to represent the range of debris expected following a LOCA. These sizes were:

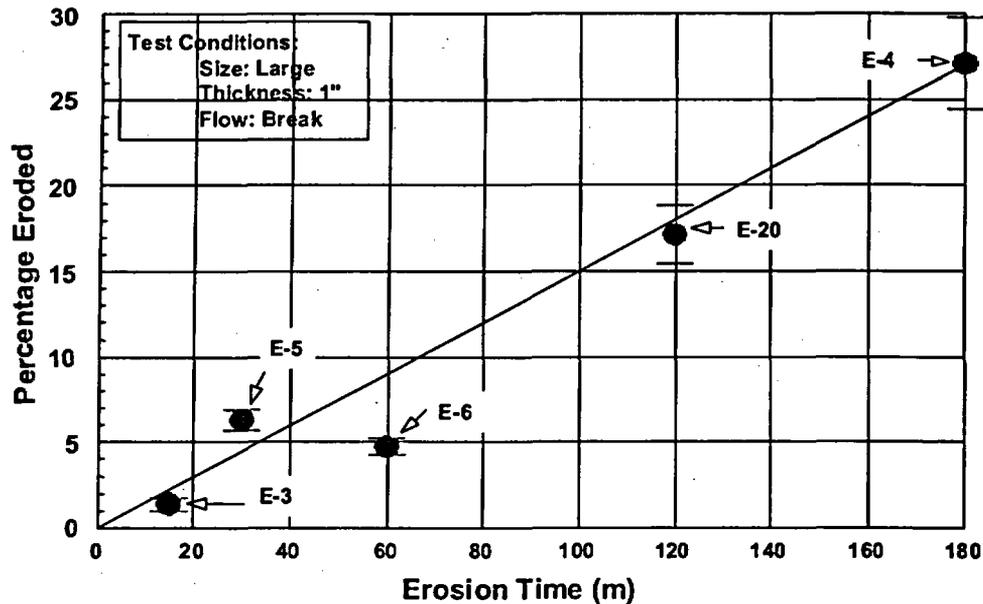
- Fine Debris This debris consisted of insulation pieces of loosely attached individual fibers less than an inch in length. This debris was obtained directly from the CEESI air jet transport tests. Such fines were typically found attached to wet surfaces such as pipes and gratings.
- Small Debris This debris was characterized as debris with a light, loose, and well-aerated texture with an average density lower than 0.25 lbf/ft<sup>3</sup>. The pieces were typically about 1.5-inches in size and possessed little of its original structure. This debris was also obtained from the CEESI air jet transport tests and was mainly used in the spray tests.
- Medium Debris This debris consisted of pieces of insulation typically about 4-inches by 6-inches in dimension. This debris was formed by one of the two following methods:
  - Generated in the CEESI air jet tests where, although torn, the pieces kept some of the original structure of the insulation.
  - Cutting intact insulation into medium sized pieces produced the pieces.
- Large Debris This debris consisted of relatively large pieces of insulation ranging in size from 10-inch by 10-inch to 18-inch by 18-inch. This debris was manually cut into predetermined sizes. Note that the air jet tests clearly demonstrated that large pieces of debris produced by jet impingement tended to retain most of the original insulation structure.

Within the ranges of tested parameters, the data exhibited the following trends:

- Little or no erosion is possible for insulation pieces covered in canvas when subjected to washdown flow resulting from either the break overflow or containment spray.
- Most of the small pieces of debris resting on the grating bars will be washed down by water within about 15 minutes after which the washdown reaches an asymptote.
- A significant fraction of the medium pieces would be eroded and transported.

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- Large pieces will not be forced through the grating even at high flows. The pieces will remain on the grating and may erode with time. Erosion also exhibits an asymptotic behavior, as illustrated in Figure 2-13. The typical condition of debris after exposure to water is shown in Figure 2-14.
- The product of the erosion of large debris consists of fine debris, i.e., individual fibers and small clumps of fibers, likely to remain suspended in a pool of water with minimal turbulence.



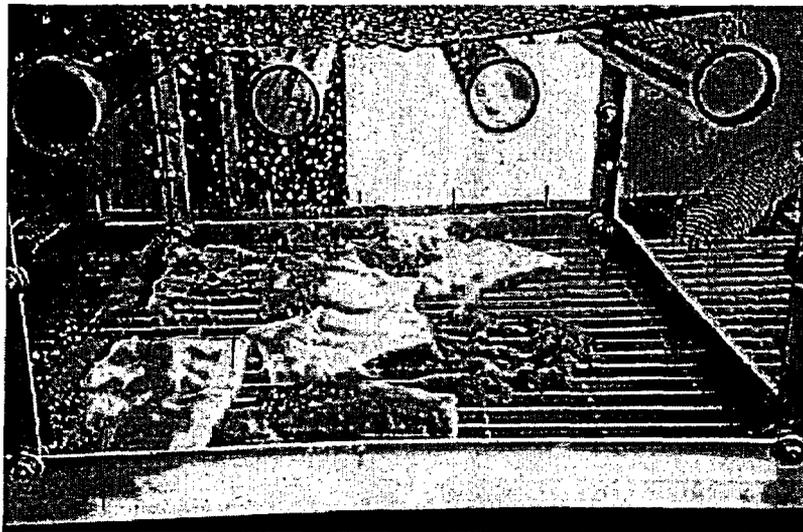
*Figure 2-13. Time-Dependency of 1-inch Insulation Blanket Material Under Break Flow Conditions*

### Test Conclusions:

- All finer debris, smaller than the grating cells, captured on the grating as a result of inertial capture would most likely be washed down when subjected to break and/or containment spray flows.
- A significant fraction of the medium pieces would be transported. For break overflows, likely most of the medium pieces would transport. For containment spray flows, perhaps 50% would transport.
- Erosion of large debris is dependent upon both time and flow rate. At low flow rates typical of containment sprays, the erosion of large pieces is negligible; especially considering that containment sprays are only operated intermittently. At water flow rates typical of break flow, the rate of erosion is substantial (as high as 25% for a 3 hours duration). For such conditions, an erosion rate of 3 lbm/100-ft<sup>2</sup>/hr is recommended.

### Documentation

A complete description of these tests, test apparatus, test procedures, and test data, is documented in detail in Section 4 of NUREG/CR-6369, Volume 2. The report includes a number of photos showing debris captured on the surfaces of obstructions.



*Figure 2-14. Typical Condition of Debris After Exposure to Water*

### 2.1.2 RMI Debris Testing

#### 2.1.2.1 RMI Debris Generation Tests

Reflective Metallic Insulation (RMI) is used in a large number of BWRs in the USA. In the event of a LOCA at a plant using RMI for insulation, it is anticipated that some fraction of damaged RMI would be transported to the suppression pool and then potentially transport to the ECCS suction strainers. Säteilyturvakeskus (STUK), the Finnish Centre for Radiation and Nuclear Safety issued a report, "Metallic Insulation Transport and Strainer Clogging Tests," [STUK-YTO-TR-73] that demonstrated experimentally that RMI can be transported to ECCS strainers and cause increased head loss (see Section 3.4.1). A key element of estimating the impact of RMI on loss of ECCS is adequate data for the size distribution and general shapes of RMI fragments caused by a double-ended guillotine break (DEGB).

Between October 1994 and February 1995, the Swedish Nuclear Utilities conducted metallic insulation jet impact tests at the Siemens AG Power Generation Group (KWU) test facility in Karlstein am Main, Germany [MIJIT]. Although the Swedish tests were reasonably extensive, only a general summary of the test results was released. Specific test data from the RMI debris generation tests was not made publicly available. In addition, the data is not directly applicable to U. S. power plants because the European RMI was designed substantially different from the RMI currently installed in U. S. power plants. In 1995, the NRC conducted a single debris generation test to generate representative RMI debris to obtain insights and data on the effects of RMI relative to U. S. plants. These tests were contracted to Siemens AG/KWU in Karlstein, Germany.

#### Test Objective

The primary objective was to investigate the destruction of RMI by a DEGB and to produce RMI debris prototypical of a postulated DEGB in a U. S. plant for subsequent hydraulic suspension and head loss testing. A major supplier of RMI to U. S. nuclear power plants, the Diamond Power Specialty Company, supplied Mirror<sup>®</sup> RMI cassettes for debris generation.

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### Test Apparatus and Instrumentation

The test was conducted at the Siemens Large Valve Test Facility (GAP) located at their Karlstein laboratory. The GAP facility, originally designed to test large valves, is capable of providing large flow rates of saturated steam (up to 2000 kg/sec at 90 bar), saturated water, or a two-phase mixture. Normal service conditions as well as accidents can be simulated, especially those involving pipe breaks and steam-water discharge. The NRC test was carried out with saturated steam. The facility test loop consisted of a 4,593-ft<sup>3</sup> steam/water accumulator, 28-inch main steam line or a 16-inch main water line, and a quench pool with a maximum water volume of 24,000 ft<sup>3</sup> to condense the steam. A 22 MW oil-fired high-pressure boiler charged the accumulator.

The test loop, as configured for the NRC test, consisted of the accumulator filled with saturated water and steam, the 28-inch main steam line, an 8-inch discharge nozzle, a rupture disk device, and the DEGB-simulator. The quench pool was empty and dry. A perforated cylindrical cage (12.6 ft diameter and 28 ft length) surrounded the target rig to retain the bulk of the debris.

The DEGB-simulator was mounted directly on the rupture disk device and one target panel was mounted directly over the simulator. The construction of the DEGB-simulator limited the break flow to the circumference of the pipe, i.e., simulating a DEGB with both pipe ends remaining in the co-axial configuration. In fact, the pipe break probably would be better described as a circumferential line break than as a DEGB. With this configuration, the break flow was directed at the inner surface of the RMI target and at about the mid-length of the target.

### Test Data

The test was conducted on May 31, 1995. Most of the RMI debris was recovered and categorized by location where it was found. Approximately 91% of the debris was recovered as loose foil pieces and the remainder was found wedged in place among the structures. The debris was analyzed with respect to size distribution. The overall size distribution for the total recovered debris mass is shown in Figure 2-15. A photo of typical RMI debris generated by a large pipe break is shown in Figure 2-16.

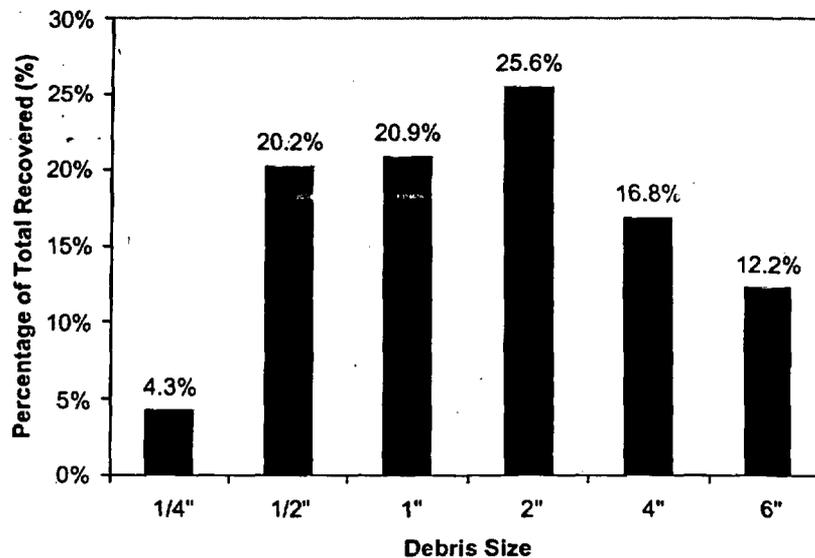


Figure 2-15 Size Distribution of DEGB Generated RMI Debris



**Figure 2-16. Typical RMI Debris Generated by Large Pipe Break**

Documentation

A complete description of the NRC sponsored SIEMENS RMI debris generation test is found in SEA-95-970-01-A:2, "Experimental Investigation of Head Loss and Sedimentation Characteristics of Reflective Metallic Insulation Debris," and NT34/95/e32, "RMI Debris Generation Testing: Pilot Steam Test with a Target Bobbin of Diamond Power Panels."

**2.1.2.2 RMI Suppression Pool Sedimentation Tests**

The potential for RMI debris transport within a suppression pool to an ECCS pump suction strainer was demonstrated experimentally. Another key element of estimating the impact of RMI on loss of ECCS suppression pool debris transport characteristics. As discussed in Section 2.1.1.2, the BWR suppression pool following a postulated LOCA would pass through a range of turbulence conditions, i.e., a high level of turbulence immediately following the LOCA, a transition period, and then the longer-term quiescent period once primary system depressurization completes. Debris transported from a BWR drywell into a suppression pool would undergo mixing and potential fragmentation during the period of high turbulence. During the quiescent period, debris would settle to the suppression pool floor. These phenomena govern the transport of debris within the suppression pool thereby determining the type, quantity, and form of debris deposited onto the strainers. The NRC sponsored tests were conducted in a reduced scale suppression pool test facility to study RMI debris behaviors. ARL conducted these tests.

Test Objective

The RMI test objective was similar to that of the fibrous debris sedimentation tests. The overall purpose of the RMI suppression pool tests was to provide insights into RMI debris transport within a suppression pool following a LOCA. RMI debris transport and sedimentation within the suppression pool was studied both during the high-energy phase that would immediately follow a MLOCA and during the post high-

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energy phase. A primary focus was to obtain debris settling velocity data to support analytical evaluations.

### Test Apparatus and Instrumentation

The ARL facilities used to conduct the fibrous debris sedimentation tests were used to conduct the RMI debris sedimentation tests as well. A water tank designed to simulate a segment of a Mark I BWR suppression pool was constructed of steel with the appropriate lower curvature. This test apparatus is described in Section 2.1.1.2.

The RMI debris used in these tests was debris generated by the SIEMENS large pipe break debris generation test discussed in Section 2.1.2.1.

### Test Data

Still water debris settling tests were performed on individual pieces of RMI debris with representatives from each of six size groupings. Each piece was placed individually in the suppression pool test tank and its time to settle a known distance measured. For all sizes less than 6-inches, the mean settling velocity was about 0.12 m/s (0.4 ft/s). The large 6-inch pieces settled about 20% slower than the smaller pieces.

Chugging energy and RMI debris size were varied to determine the effect on suspension of the RMI debris. A photo of 6-inch pieces of debris in suspension during chugging is shown in Figure 2-17. Approximate settling times after the simulated chugging ended were recorded for various sized of RMI shreds.

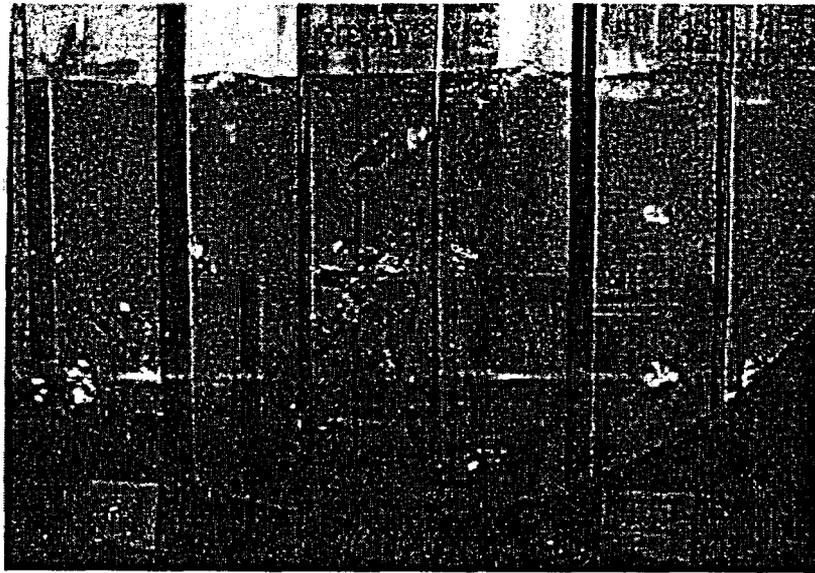


Figure 2-17. Typical Large (6") RMI Debris in Suspension During Chugging

Approximately 2/3 of the RMI pieces remained suspended at the higher energy levels, whereas ~1/2 of the pieces remained suspended during the lower energy chugging phase. The effect of residual turbulence on settling times was significant for the small RMI debris size. After chugging, the turbulence decayed away allowing settling to occur. In the turbulent pool after chugging stopped, the larger RMI debris (2" to 6"

## **NRC Sponsored Research**

category) settled up to two times faster than the smaller RMI debris (0.25" to 0.5" category). All RMI debris settled within two minutes after chugging ceased. The settling time after simulated chugging ended was independent of chugging energy. Concentration did not affect settling rates within the range of concentrations tested. However, for concentrations larger than about 2 gm/ft<sup>3</sup>, interaction between RMI shreds on the floor of the tank somewhat inhibited re-entrainment during simulated chugging. Note that because suppression pool ECCS flow recirculation was not simulated in these tests, these results do not consider the effects of recirculation on material settling or possible resuspension.

### Documentation

A complete description of the NRC sponsored ARL RMI debris sedimentation tests is found in SEA Report SEA-95-970-01-A:2, "Experimental Investigation of Head Loss and Sedimentation Characteristics of Reflective Metallic Insulation Debris," 1996, and ARL Report 170-95/M787, "Reflective Metallic Insulation Settling Following a LOCA in a BWR Suppression Pool," 1995.

### **2.1.2.3 RMI Head Loss Tests**

RMI debris deposited on an ECCS pump suction strainer will affect strainer head loss and could potentially compromise the pump. Data was needed to gain insights into RMI head losses and to derive models capable of predicting the head loss associated with RMI debris. The NRC sponsored a modest set of confirmatory head loss experiments to verify the results of tests conducted by BWROG using prototypical RMI debris (see Section 3.3.2). These tests were conducted at ARL.

### Test Objective

Tests were conducted to quantify head losses across BWR suppression pool suction strainers associated with the accumulation of stainless steel RMI debris (aluminum RMI was not tested), with and without fibrous insulation debris and/or sludge. The test parameters included: RMI debris sizes and loadings (mass per unit strainer area), fibrous debris loadings (thickness of fiber bed), particulate to fiber mass ratio, and water flow approach velocity. The impact of the relative timing of debris accumulation on the strainer was explored, i.e., RMI debris and fibrous debris deposited in layers as opposed to being mixed.

### Test Apparatus and Instrumentation

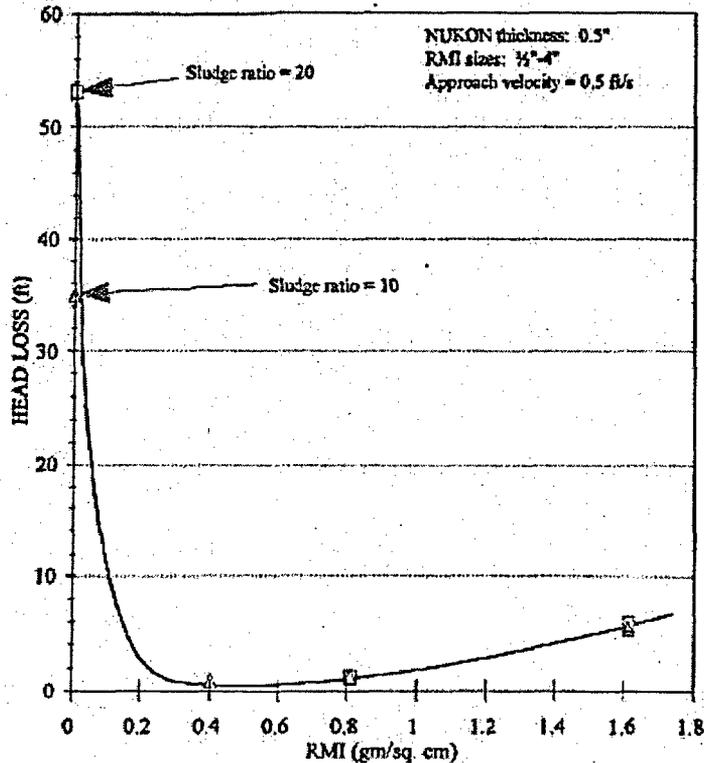
These tests were conducted using the same closed loop test facility used for the fibrous insulation head loss tests (see Section 2.1.1.1). The test apparatus, shown in Figure 2-1, consisted of a closed loop where the same water was repeatedly forced through the strainer. A relatively uniform velocity profile at the strainer was achieved by implementing a long vertical 12-inch diameter pipe test section. The upstream approach to the strainer was 11-ft long and the downstream portion was another 4.5-ft in length. The remaining loop piping was constructed of 4-inch piping to keep flow velocities high enough to minimize debris settling within the horizontal portions of the loop. Resistance heating was used to maintain water temperature and the piping was insulated to minimize heat loss.

Because the flow velocity approaching a typical semi-conical shaped BWR strainer is fairly uniform, a flat plate strainer was deemed adequate for the test apparatus. Note that the approach velocity for advanced strainer designs likely will not be uniform. The test strainer was constructed from 14-gauge stainless steel plate perforated with 1/8-inch holes with a density of 30 holes per square inch.

RMI debris introduced into the loop accumulated on the strainer. The RMI debris used in these tests was debris generated by the SIEMENS large pipe break debris generation test discussed in Section 2.1.6.

Test Data

For the conditions tested, the RMI head loss tests demonstrated that introduction of prototypical RMI debris, in combination with fibrous debris and sludge, does not cause significantly different head losses than those observed with only fiber and sludge loadings. In fact, the most significant finding was that when RMI debris was mixed with fibrous debris and sludge, the head losses appeared to decrease when compared to similar conditions without RMI debris. This finding is illustrated in Figure 2-18, which shows head loss as a function of RMI loading added to a 1/2" thick bed of NUKON™ and sludge. A typical RMI/NUKON/sludge post-test debris cake on the strainer plate is shown in Figure 2-19. The trend where the addition of RMI to fibrous bed reduced the head loss was not apparent in the tests without sludge.



**Figure 2-18. Effect of RMI Debris on Head Loss When Mixed with Fibrous Debris**

Caution must be used in generalizing these specific conclusions and in applying the data to actual plant specific analyses since the number of experiments was limited, data scatter was significant, and not all prototypical situations were explored. Further, limited data from another test program conducted by the industry indicated that the head loss contribution due to the addition of RMI to a fiber/sludge bed could be significant in some situations. This finding contradicts the conclusion of these tests that RMI in mixed fiber/RMI beds does not contribute significantly to the head loss of the mixed bed. This issue is discussed further in Sections 4.4 and 5.3. It must be further cautioned that data collected for the flat test strainer likely will not be directly applicable to the advanced complex-geometry strainers employed by the strainer replacement program.

## NRC Sponsored Research

For the limited thicknesses and debris distributions tested, the mixed layers of RMI and fibrous insulation debris on the strainer produced higher head losses than did the layered (stratified) debris. Note that only layers of insulation formed with RMI debris on the bottom and fibrous debris on top were tested, but not the reverse order. A mixed debris condition is assumed to be typical for postulated LOCA scenarios, however, it is possible that actual deposition in selected scenarios may not result in homogeneous mixtures of debris at strainer surfaces.

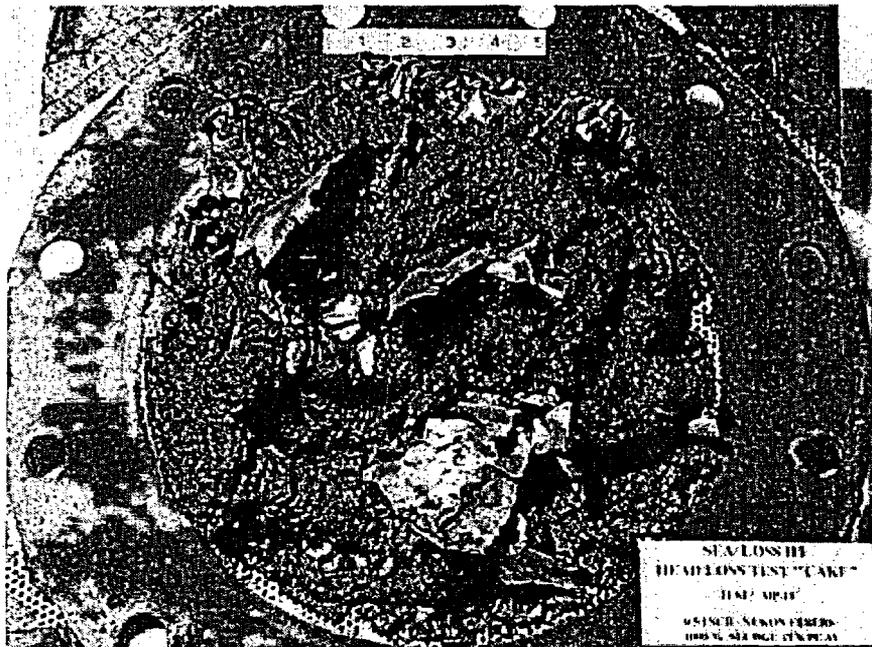


Figure 2-19. Typical RMI/NUKON/Sludge Post-Test Debris Cake

When RMI debris was tested alone (no fibrous debris), the head losses were relatively small compared to the head losses of fibrous beds. Head losses for the RMI loadings tested ( $0.8$  to  $2.4$  gm/cm<sup>2</sup>), ranged from about 1 to 4 ft-water at an approach velocity of 1 ft/s.

### Documentation

A complete description of the NRC sponsored ARL RMI debris head loss tests is found in SEA Report SEA-95-970-01-A:2, "Experimental Investigation of Head Loss and Sedimentation Characteristics of Reflective Metallic Insulation Debris," 1996, and ARL Report 92-96/M787F, "Head Loss of Reflective Metallic Insulation Debris with and without Fibrous Insulation Debris and Sludge for BWR Suction Strainers," 1996.

### 2.2 NRC Analytical Developments

For the NUREG/CR-6224 study, a deterministic analysis was performed to determine if a postulated break in the primary system piping of the reference BWR plant could result in ECCS strainer blockage and loss of NPSH. The analysis considered debris generation, drywell debris transport, suppression pool debris transport, and strainer blockage. The study developed analytical models applicable to the study's reference BWR to predict the quantities of debris generated. The quantities of debris that would transport, from the drywell to the suppression pool, the quantities of debris within the suppression pool

## **NRC Sponsored Research**

that would transport to the strainers, and the head loss across the strainer caused by accumulation of debris. The BLOCKAGE computer program was developed to calculate debris generation, debris transport, fiber/particulate debris bed head losses, and its impact on the available NPSH.

To further build on the NREG/CR-6224 study results, the NRC sponsored the drywell debris transport study (DDTS) to investigate debris transport in BWR drywells. The purpose of the study was to provide a description of the important phenomena and plant features that control and/or dominate debris transport and the relative importance of each phenomenon as a function of the debris size. The DDTS also provided reasonable engineering insights that can be used to evaluate debris transport fraction estimates used in utility strainer blockage analyses. To support the DDTS, the NRC convened a panel of recognized experts with broad based knowledge and experience to apply the Phenomena Identification and Ranking Table (PIRT) process to the transport of break-generated debris through BWR drywell. The PIRT process was designed to enhance the DDTS analysis by identifying processes and phenomena that would dominate the debris transport behavior. Further, these processes and phenomena were prioritized with respect to their contributions to the reactor phenomenological response to the accident scenario.

The NRC was concerned that new credit for containment overpressure would be required for some licenses to meet the NPSH requirements of the ECCS and containment heat removal pumps. As a result, the staff re-evaluated its position on use of containment overpressure in calculating NPSH margin.

### **2.2.1 Reference Plant Evaluation**

The NRC sponsored research to evaluate the adequacy of existing strainer designs in U. S. BWR plants. In September 1993, the NRC initiated a detailed reference-plant study using a BWR/4 reactor with a Mark I containment. The analysis supporting the original resolution of USI A-43 was based on a reference PWR plant. As a result, a BWR plant-specific analysis was considered appropriate for evaluating the NRC's BWR strainer blockage concerns. Specific aspects of the issue not identified in the PWR study needed to be evaluated when considering BWRs. These aspects included BWR specific design issues, insulations used in BWR plants, and non-insulation debris found in BWR plants (e.g., suppression pool sludge).

### **Study Objective**

The primary objective of the study was to determine the likelihood that a postulated break in the primary system piping of the reference BWR plant could result in the blockage of an ECCS strainer and the loss of pump NPSH. The analyses involved both deterministic and probabilistic techniques to arrive at its conclusions. The deterministic analyses focused on models to simulate phenomena governing debris generation, drywell and wetwell debris transport, and strainer head loss. The probabilistic analyses focused on evaluating the likelihood of core damage related to strainer blockage based on LLOCA-initiators.

### **Study Analytical Models**

The reference plant selected for this study was selected because its design included the plant features under consideration and because the plant was considered to have a higher probability of experiencing a blockage of its strainer. For instance, the plant was a Mark I design with a relatively small suppression pool leading to comparatively faster strainer flow velocities than other BWR plants. In addition, more than 99% of the primary system piping was insulated with steel-jacketed fiberglass insulation.

The analyses methodologies broke the analytical problem down into several steps that were analyzed separately. These steps were:

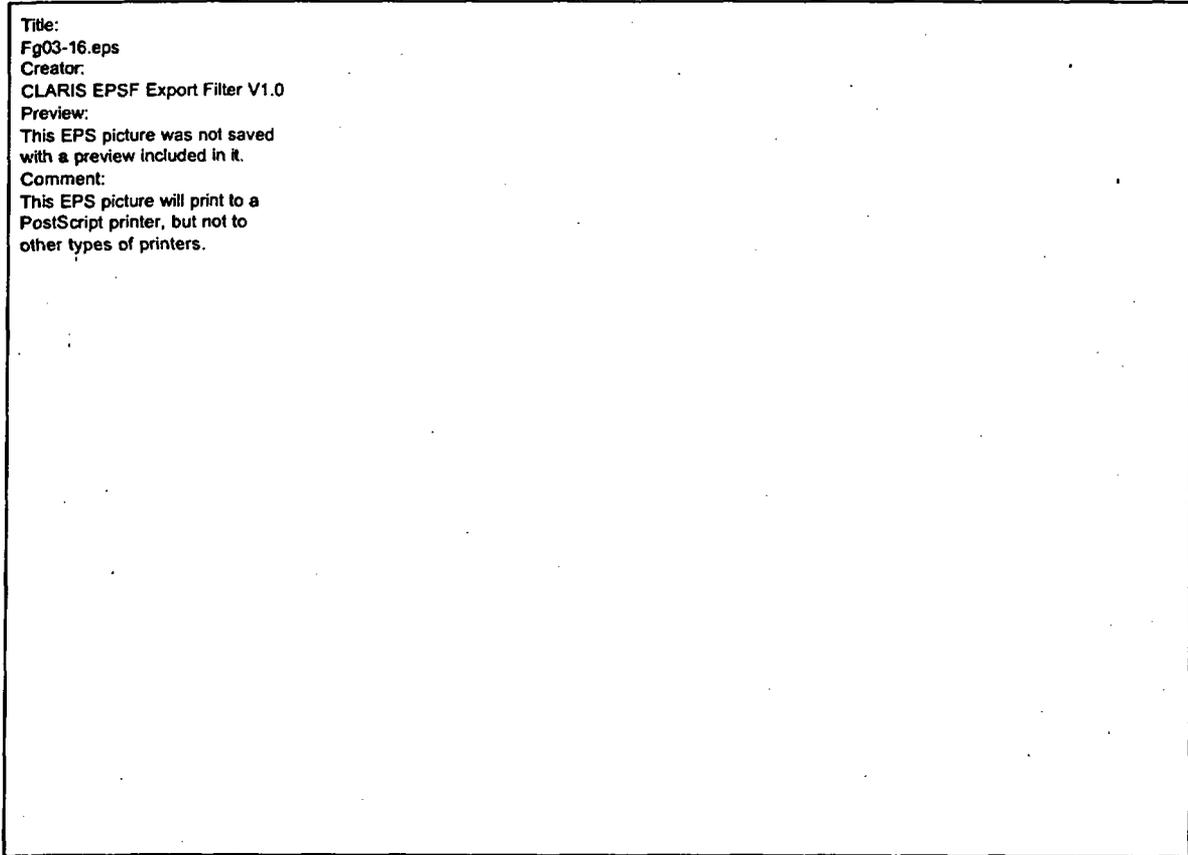
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- **Pipe Break Analysis:** All pipe welds were located and their corresponding probabilities for failure estimated. Note that historical evidence and pipe failure analyses suggest that pressure boundary failure would most likely occur at weld locations.
- **Debris Generation Analysis:** A model was developed to estimate the quantity of insulation debris that could be generated by the failure of each pipe weld. The debris quantity was estimated for each postulated weld failure.
- **Drywell Debris Transport Analysis:** A model was developed to estimate the quantity of insulation debris, once generated, that would be transport from the drywell into the wetwell.
- **Suppression Pool Debris Transport Analysis:** A model was developed to estimate the quantity of insulation debris, once in the suppression pool, that would transport to an ECCS suction strainer. In addition, the suppression pool model addressed the transport of sludge particles within the pool to a strainer.
- **NPSH Analysis:** A model was developed to predict the head loss across a strainer due to the accumulation of fiber and particulate debris on the strainer. The impact of debris head loss on pump NPSH was evaluated.
- **Risk Analysis:** A functional event tree was developed that modeled accident progression for a LLOCA-initiator with specific relevance to the ECCS strainer blockage issue. Quantification of the event tree resulted in estimates for the blockage-related CDF due to loss of ECCS following a LLOCA.

The debris generation model (DGM) was based on the locations of piping welds and the insulation that would be targeted by the break jet. A review of plant drawings identified all high-pressure welds in the primary system piping. The initial blast wave, ensuing break-jet expansion, impingement forces, type of insulation, and mode of insulation encapsulation were all dominant contributors to insulation debris generation following a LOCA. Of secondary importance, were other contributors, such as pipe whip and pipe impact. A three-region two-phase conical jet expansion model, described for PWR plants in both NUREG-0869 and NUREG-0897, was adapted for the reference plant study. This model, illustrated in Figure 220, defines a zone of influence (ZOI) over which the insulation would be destroyed and dislodged from the surrounding pipes. The ZOI in a BWR plant, with respect to a PWR, reflected: 1) the lower operating pressures of BWR plants, 2) the more dense pipe congestion in a BWR drywell which limits the free expansion of the break jet, and 3) simultaneous expansion in opposite directions of DEGB weld break jets. A spherical ZOI was assumed to extend from the location of the break to a distance of seven times the pipe diameter (i.e.,  $L/D = 7$ ). The DGM, as applied to the reference plant, assumed that:

- 75% of the insulation located within an  $L/D$  of 3 would be destroyed.
- 60% of the insulation located between  $L/D$  of 3 and  $L/D$  of 5 would be destroyed.
- 40% of the insulation located between  $L/D$  of 5 and  $L/D$  of 7 would be destroyed.

The DGM was used to estimate the quantity of fibrous debris generated by a postulated break. Other sources of LOCA generated debris included failed containment coatings and concrete dust.



*Figure 2-20. Schematic Illustration of the Debris Generation Model*

Debris transport from the drywell to the suppression pool is strongly influenced by factors such as tortuosity of the transport pathways, flow velocity, and debris characteristics. This study postulated that debris transport from the drywell to the suppression pool would occur over two phases, i.e., the blowdown phase and the washdown phase. During the blowdown phase, debris would be carried by primary system depressurization flow to the suppression pool. During the washdown phase, debris would be carried to the suppression pool by the break overflow and by containment spray flow.

Debris transport phenomena was too complex to model accurately in this study, therefore a simplified parametric model was applied, i.e., a transport fraction was applied to each of three elevations within the drywell. The reference plant drywell was subdivided into three transport regions defined by the two main gratings within the drywell. It was assumed that:

- 75% of debris generated within the lowest region between the drywell floor and the lower grating would transport to the suppression pool.
- 50% of debris generated within the middle region between the lower grating and the upper grating would transport to the suppression pool.
- 25% of debris generated within the highest region above the upper grating would transport to the suppression pool.

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The drywell debris transport was subsequently studied in detail in the Drywell Debris Transport Study (DDTS) discussed in Section 2.2.3 of this report.

The transport of debris within the suppression pool to the ECCS suction strainers is complicated by a variety of effects. Models for these effects were broken down into two main phases with an interim transition phase. During the blowdown phase, pool dynamics would be governed by the extremely dynamic primary system depressurization. The LOCA-induced pool turbulence such as condensation oscillations and chugging within the downcomers would re-suspend debris initially settled to the pool floor (i.e., sludge), uniformly distribute the debris throughout the suppression pool, and further breakup pieces of debris. During the relatively quiescent washdown phase, gravitational settling would be important as debris could once again settle to the suppression pool floor. Analytical models were developed that were based on and benchmarked to the experimental data collected for strainer head losses and suppression pool sedimentation, described in Sections 2.1.1.1 and 2.1.1.2, respectively. These time-dependent models were programmed into the BLOCKAGE code, discussed in Section 2.2.2. Then the BLOCKAGE code was used to predict debris quantities, by type and size that would accumulate on the strainers.

Accumulation of debris on the strainer would result in head loss and could cause loss of NPSH margin. For the reference plant, the debris bed on the strainer would consist primarily of fibrous insulation debris with suppression pool corrosion products (i.e., sludge) embedded within the fibers. Particles not filtered from the flow by the fibrous debris would pass through the strainer and either settle within the primary system or return to the containment by way of the break flow. At the time, the reference plant strainers employed simple truncated conical shaped strainers. Small and fine fibrous debris (the most transportable of the debris sizes) would accumulate on this type of strainer relatively uniformly. A uniform distribution of debris across the strainer surface area is generally considered the worst-case scenario because it provides the greatest head loss.

Experimental head loss data was obtained from fibrous bed head loss and filtration tests conducted by ARL (discussed in Section 2.1.1.1). These NRC sponsored tests studied head loss across beds formed of NUKON™ fibers and iron oxide particles ranging from less than 1 micron to greater than 300 microns in size. In addition to head loss measurements, Scanning Electron Microscope (SEM) images of the debris beds and visual observations of bed formation and bed compression were used to develop a semi-theoretical head loss correlation. Using this correlation to predict head loss measurements for available head loss tests validated the correlation. The correlation is:

$$\frac{\Delta H}{\Delta L_o} = Units \left[ 3.5 S_v^2 (1 - \epsilon_m)^{1.5} \left[ 1 + 57 (1 - \epsilon_m)^3 \right] \mu U + 0.66 S_v \frac{(1 - \epsilon_m)}{\epsilon_m} \rho_w U^2 \right] \left( \frac{\Delta L_m}{\Delta L_o} \right)$$

- Where
- $\Delta H$  = the strainer head loss (ft-water)
  - $\Delta L_o$  = the theoretical thickness (uncompressed) of fiber bed (inch)
  - $\Delta L_m$  = the actual thickness (compressed) of fiber bed (inch)
  - $S_v$  = the specific surface area of the fiber-particulate mixture (ft<sup>2</sup>/ft<sup>3</sup>)
  - $\epsilon_m$  = the porosity of the fiber-particulate mixture
  - $U$  = the velocity of the water flow (ft/s)
  - $\mu$  = the viscosity of water (lbm/s-ft)
  - $\rho_w$  = the density of water (lbm/ft<sup>3</sup>)
  - Units =  $4.1528 \times 10^{-5}$  (ft-water/in/(lbm/ft<sup>2</sup>/s<sup>2</sup>))

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For an incompressible bed, the actual bed thickness is the same as the theoretical bed thickness, however visual observations have clearly determined that fibrous debris beds are highly compressible under the effect of differential pressure across the bed, which acts as a compacting force. The solution of the head loss correlation requires an expression for the bed compressibility. The following correlation was found to work well.

$$\frac{\Delta H}{\Delta L_o} = \left[ \left( \frac{1}{\alpha} \right) \left( \frac{\Delta L_o}{\Delta L_m} \right) \right]^{\frac{1}{\gamma}}$$

Regression analysis determined the values for the constants  $\alpha$  and  $\gamma$  to be 1.3 and 0.38, respectively.

Blockage-related core damage accidents involve the failure of the ECCS pumps due to loss of NPSH and the subsequent failure to establish an alternative means for core cooling. A number of considerations were involved in estimating the contribution of ECCS strainer blockage to CDF, including:

- LOCA frequency.
- ECCS strainer blockage probability.
- Operator recognition of strainer blockage.
- Availability of back flushing.
- Alternative means of providing core cooling.
- Protection of containment integrity.
- Time available for operators to take mitigating actions.
- Additional operator recovery actions.

A simplified event tree model, representing the progression and expected outcomes of various possible LOCA sequences, was used to generate the CDF estimates.

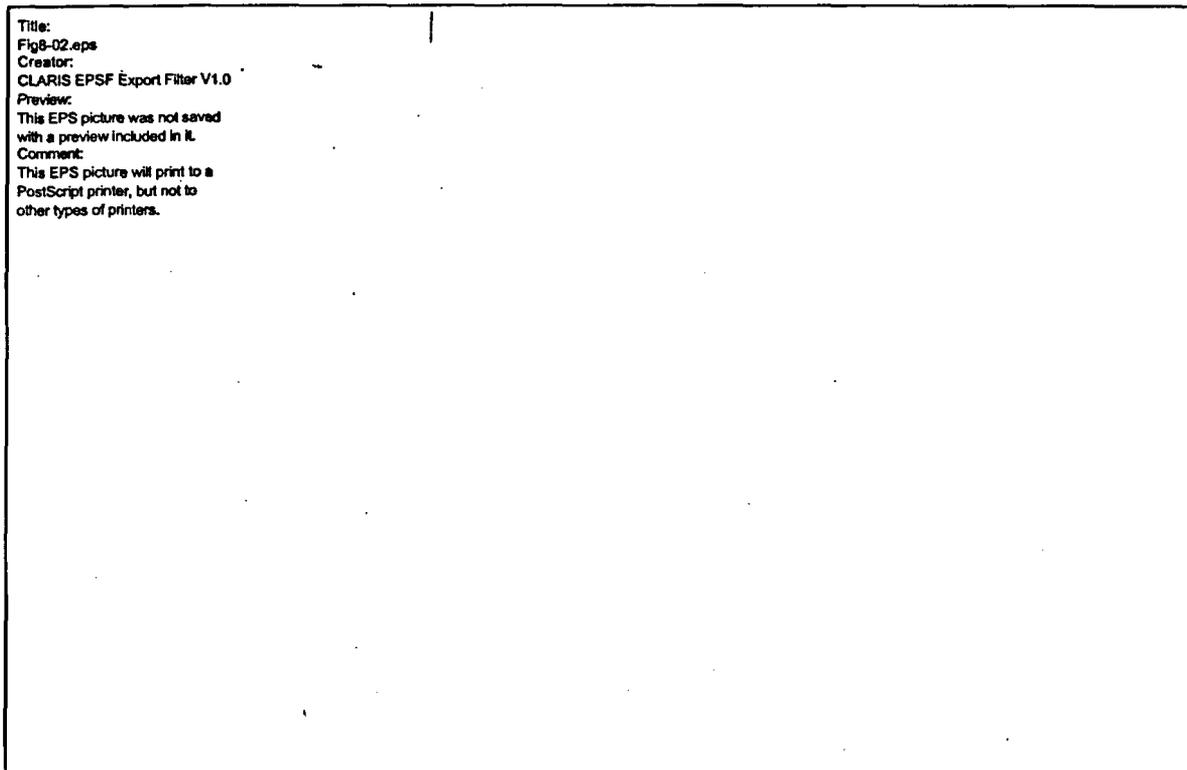
### Study Conclusions

The results of the reference plant study demonstrated that with the existing ECCS pump suction strainers there was a high probability that the available NPSH margin for the ECCS pumps would be inadequate following a LOCA because of the transport of debris to the suction strainers. The pipe break frequency (per Rx-year) estimates for a DEGB postulated to occur on piping systems analyzed ranged from 3.2E-06 to 1.2E-04 and the overall pipe break frequency was estimated to be 1.5E-04. Almost all postulated DEGBs resulted in unacceptable strainer blockage leading to the loss of NPSH margin for the ECCS pumps. The overall loss of NPSH margin frequency was estimated to be 1.5E-04. The point estimates for the CDF due to blockage-related LOCA accident sequences for the reference plant ranged from 4.2E-06 to 2.5E-05. The simplified event tree is illustrated in Figure 2-21.

The temporal behavior of the head loss was evaluated for selected welds. For all welds examined, the NPSH margin was estimated to be lost within a few minutes (less than 10 minutes into the event) after full ECCS flow was achieved. An example of time-dependent suppression pool debris transport (Weld

## NRC Sponsored Research

RCA-J006) is shown in Figure 2-22; the corresponding head loss reached ~750 ft-water at 10 minutes and ~1500 ft-water at 1 hour (theoretical predictions using the BLOCKAGE code, see Section 2.2.2). In addition, an extended parametric analysis was performed to investigate the sensitivity of the temporal head loss estimates to each of B key parameters. The head loss estimates were found to be most sensitivity to the strainer surface area, the ECCS flow rate, the filtration efficiency, and the quantity of particulates. Within the variations of the parameters analyzed, the strainer area was found to be the only independent variable, which could effectively reduce the head loss below the available NPSH margin. By increasing the strainer area by a factor of 8, the loss of NPSH margin was no longer estimated to occur. Note that the reference plant strainer was replaced with a much larger strainer, thereby resolving the strainer blockage issue at that plant.



*Figure 2-21. Simplified Event Tree for LLOCA at the Reference Plant*

The methodology developed for this study is sufficiently flexible to be extended to other types of insulation. The study also demonstrated that determining the adequacy of NPSH margin for an ECCS system is highly plant-specific because of the large variations in such plant characteristics as containment type, ECCS flow rates, insulation types, plant layout, plant cleanliness, and available NPSH margin. Several parameters, such as the insulation destruction fractions and the drywell transport fractions for the reference plant were determined using considerable engineering judgment based on limited data, therefore considerable caution must be exercised in assigning values to many of the parameters used by these models for other types of insulation and other drywell layouts. Based on today's knowledge and testing performed at CEESI (see Section 2.1.1.4), the NRC recommends basing the estimate of debris generation on test data. Note that uncertainty associated with assigning values for the drywell debris transport parameters prompted the DDTS.

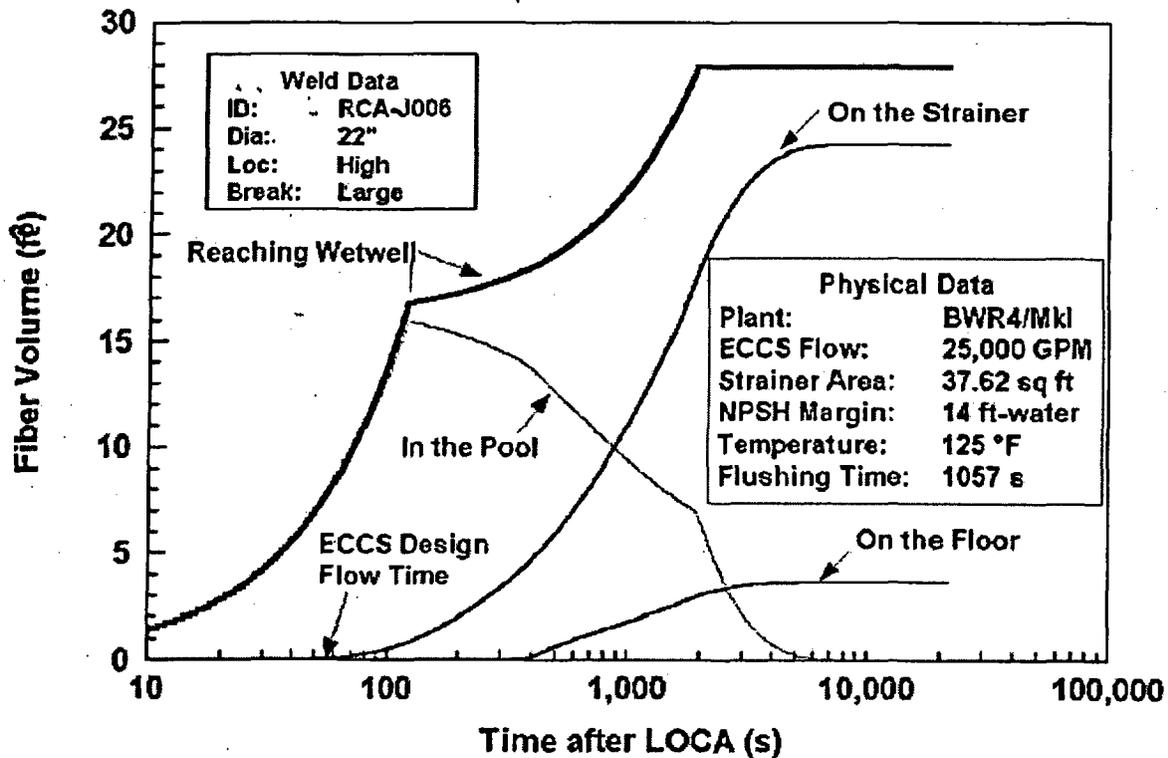


Figure 2-22. Typical Fibrous Debris Transport in the Suppression Pool

**Documentation**

A complete description of this of study was documented in detail in NUREG/CR-6224. This report was released first published as a draft-for-comment in August 1994 and than as a final report in October 1995.

**2.2.2 BLOCKAGE Computer Code**

The complexity of all the phenomena associated with determining strainer head loss associated with debris blockage called for a computer program designed to quickly solve for the head loss given basis plant input data. The BLOCKAGE computer program was developed to calculate debris generation, debris transport, fiber/particulate debris bed head losses, and its impact on the available NPSH. The BLOCKAGE code included models for transient debris bed formation and used the fiber/particulate head loss correlation (known as the NUREG/CR-6224 head loss correlation) developed in the reference plant study. The correlation was validated for laminar, transient, and turbulent flow regimes through mixed beds.

**Software Description**

BLOCKAGE Version 2.5 is an integrated calculational method with a graphic user's interface (GUI) for evaluating the potential for loss of emergency core cooling systems pump net positive suction head margin due to insulation and non-insulation debris buildup on suction strainers following a postulated loss of coolant accident in boiling water reactors. BLOCKAGE incorporates the results of multi-year NRC

## **NRC Sponsored Research**

sponsored research documented in NUREG/CR-6224. It also provides a framework into which user can input plant specific/insulation-specific information for performing analysis in accordance with Revision 2 of Regulatory Guide 1.82.

### **Software Capabilities**

BLOCKAGE 2.5 allows the user to simulate debris generation and subsequent transport of multiple types of debris including fibers, particles, and metals, using either a three-zone destruction model or a user-specified quantity of debris for transport. The debris transport from the drywell to the wetwell can be location-dependent and time-dependent. The transport during the blowdown period due to depressurization flows is treated separately from the transport during the washdown phase, which is due to ECCS recirculation, containment spray, and steam condensate flows. Two sizes of pipe break scenarios are considered: large and medium LOCAs. The debris transport within the suppression pool including the deposition of debris on the strainers and the debris concentration within the pool is calculated separately for each discrete debris size and each debris type. The suppression pool is treated as a single volume of water. Specifically, debris concentration does not vary with location in the pool. The user supplies several model parameters which are time-dependent: the calculational time step, the pump flow rates, the drywell debris transport rates, the suppression pool temperature, and the suppression pool resuspension and settling rates.

Several independent ECCS pumping systems can be modeled simultaneously, with each system consisting of multiple pumps on a common header attached to a single equivalent strainer. Each pump is considered to fail by loss of NPSH margin when the strainer head loss exceeds its temperature-dependent NPSH margin. A debris bed filtration model estimates the quantities of debris that are entrained in the pump flow that are either deposited on the strainer or passes through the strainer and retained within the primary system.

Four user-head loss correlations including the NUREG/CR-6224 correlation, a BWR Owner's Group (BWROG) 1994 correlation, and two generic correlations are available to predict the strainer head losses. The failure of the ECCS to provide long-term cooling to the reactor core is flagged whenever the total ECCS flow capability drops below a user specified minimum flow rate. When selected by the user, BLOCKAGE 2.5 can also write several probabilities reports that provide information regarding the plant-wide strainer blockage probabilities correlated by pipe diameter, piping system, and break location.

The GUI makes BLOCKAGE relatively easy to use and provides a graphical output capability. The GUI provides both front-end processing of the input data and back-end processing of the output including the plotting of time-dependent results. The user also executes BLOCKAGE from the GUI.

### **Software Verification and Validation**

The BLOCKAGE code was subjected to rigorous coding verification to ensure that the code performs as it was designed to perform. In general, extensive quality assurance (QA) was integrated into the development of the BLOCKAGE code. Methods of ensuring quality included line-by-line reviews of coding, calculating results by hand and verifying the results with analytical solutions. A complex analytical test problem was developed that solved the system of differential equations inherent in the numerical solution of BLOCKAGE. This test problem was solved by both BLOCKAGE and by commercially available mathematics software; their solutions were virtually identical. The output sensitivity to the time step selection was also tested.

BLOCKAGE was validated against applicable experiments. BLOCKAGE code predictions clearly were in good agreement with the experimental data. In all cases, the measured head loss was within 50% of

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BLOCKAGE predictions, with BLOCKAGE predictions always higher than the experimental data. Considering that the experimental data is associated with large uncertainties ( $> \pm 35\%$ ) such a comparison is exceptional.

### **Software Limitations**

At the time the BLOCKAGE code was developed, the approach velocities to existing plants strainers were relatively uniform even with the accumulation of debris. Hence, code models were based the assumptions of uniform approach velocity, uniform debris deposition, and constant surface area. More complex strainer designs were developed as part of the strainer clogging issue resolution, such as the stacked disk and star shaped designs. Debris deposition on strainers of these designs starts as a uniform deposition on the entire screen area but eventually debris shifts to fill the inner screen regions creating substantially non-uniform approach velocities and debris deposition. Once the inner spaces are filled, approach velocities and deposition again approaches uniformity. Hence, the BLOCKAGE code is appropriate to calculate head loss with small quantities of debris on the strainer and again when the substantial quantities of debris on the strainer but not in between. With small quantities of debris on the strainer, the entire strainer screen area would be used. With the large quantities of debris, the circumscribed area would be appropriate. BLOCKAGE could potentially be modified with a variable area that is a function of debris volume so that complex strainers could be modeled through the full range of debris deposition.

### **Documentation**

A complete description of the BLOCKAGE code was documented in detail in the User's Manual [NUREG/CR-6370] and the Reference Manual [NUREG/CR-6371]. The software is available from Oak Ridge National Laboratory (ORNL) Radiation Safety Information Computational Center as BLOCKAGE2.5R.

### **2.2.3 Drywell Debris Transport Study (DDTS)**

An essential aspect of predicting the potential for strainer clogging is the estimation of debris transport in the drywell, i.e., the fraction of the debris generated that is subsequently transported into the wetwell. The transport processes are relatively complex, in that, these processes involve the transport of debris both during the reactor blowdown phase by way of entrainment in steam/gas flows and during the post-blowdown phase by water flowing out of the break and/or containment sprays. The reference plant analyses (NUREG/CR-6224) assured that the congested layout of the drywell would offer large surface areas for debris retention. However, due to the lack of directly applicable experimental or analytical data, the fraction of debris transported to the wetwell was estimated based on engineering judgment derived from the analysis of Barseback-2 event data. However, the NRC concluded that any engineering judgment based on a scarce set of experimental data would be associated with large uncertainties, and therefore the reference plant transport fractions could not be applied to other plants. In September 1996, the NRC initiated a study, referred to as drywell debris transport study (DDTS), to investigate debris transport in BWR drywells using a bounding analysis approach. The focus of the DDTS was to provide a description of the important phenomena and plant features that control and/or dominate debris transport and the relative importance of each phenomenon as a function of the debris size.

#### **2.2.3.1 Phenomena Identification and Ranking Table (PIRT)**

The NRC convened a panel of recognized experts with broad based knowledge and experience to apply the Phenomena Identification and Ranking Table (PIRT) process to the transport of debris generated by a high energy pipe break debris through a BWR drywell. The PIRT process was designed to enhance the

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DDTS analysis by identifying processes and phenomena that would dominate the debris transport behavior. Further, these processes and phenomena were prioritized with respect to their contributions to the reactor phenomenological response to the accident scenario.

The PIRT process was conducted in parallel with the DDTS, thereby supporting the DDTS. In addition, the PIRT provided a rational framework for evaluating licensee submittals related to resolving the strainer blockage issue. The panel ranked the importance of processes and phenomena associated with drywell debris transport, but also evaluated proposed use of computer codes, evaluated the DDTS planned experimental program and reviewed both preliminary and final DDTS results. The panel addressed both high elevation main steam line breaks and recirculation line breaks low in the drywell. All three BWR containment designs were considered (i.e., Mark I, Mark II, and Mark III). When the panel identified a weakness in the DDTS methodologies steps were taken to minimize or eliminate that weakness in the DDTS.

The panel formulated the following observations regarding the DDTS methodology:

- The panel believed that the structure of the DDTS methodology provided a rational basis for reviewing licensee submittals.
- The panel believed that the structure of the DDTS methodology was sufficiently flexible that new evidence and assumptions, related to debris size and distribution, could quickly be accommodated.
- The panel found the methodology attractive in that, 1) it clearly delineated important phenomena in the BWR drywell, 2) readily incorporated, and linked, both experimental and analytical results, and 3) was comprehensible to engineers having less experience in the transport of debris.

The panel identified the following thermal hydraulic phenomena as highly important.

- Pressure driven flows including localized flow fields.
- Flashing of break liquid effluent.
- Density of drywell structures and streaming of ECCS recirculation deluge.
- Drywell floor pool formation, dynamics, and overflow into suppression pool.

The panel identified the following debris transport phenomena as highly important.

- Debris advection/slip.
- Debris impaction.
- Debris adhesion.
- Debris transport and settling within the drywell floor pool.

### Documentation

The complete description of the PIRT panel findings was documented in detail in INEL/EXT-97-00894, "BWR Drywell Debris Transport Phenomena Identification and Ranking Tables (PIRTs)," 1997 [PIRT].

#### 2.2.3.2 Transport Analysis Methodology

Due to the complexity, the problem was broken down into several individual steps. Each step was then studied either experimentally or analytically and engineering judgment was applied where applicable data were not available. The results of the individual steps were quantified using a logic chart approach to determine transport fractions for: 1) each debris size classification, 2) each BWR containment design, 3) both upper bound and central estimates, and 4) each accident scenario studied. The complexity is illustrated in Figure 2-23 for both the blowdown and washdown phases.

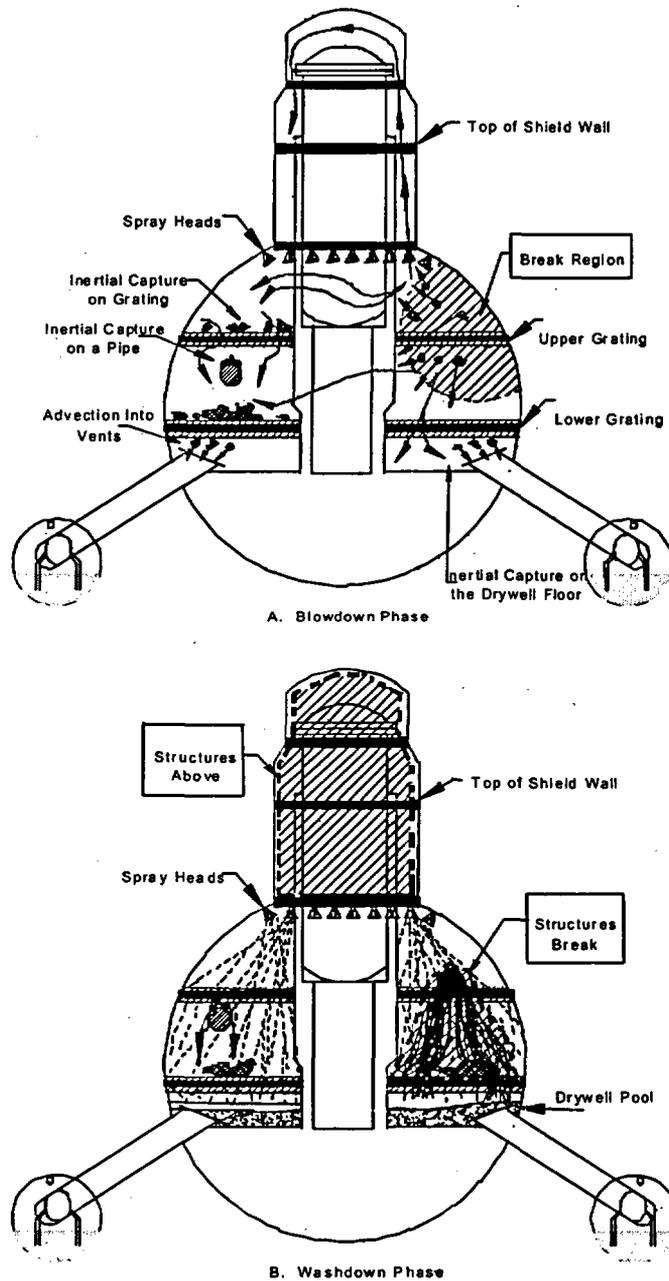
Upper bound estimates provide transport fractions that are extremely unlikely to be exceeded. Because each upper bound estimate represents the compounding of upper bound estimates for each individual step, the overall upper bound transport fractions are highly conservative. The central estimates were developed using a more realistic yet conservative representation of each individual step. While the central estimate transport fractions were deemed closer to reality, the estimates lacked the assurance of not being exceeded under any accident condition.

Early in the study, the thermal and hydraulic conditions that would govern debris transport were assessed analytically by performing calculations referred to as end-to-end scoping calculations, that encompassed the possible debris transport and capture processes. These calculations included both a series of hand computations and system level computer code calculations (i.e., MELCOR, RELAP, and CFD). All calculations were designed to examine selected specific aspects of the overall problem. The calculations results were then used to subdivide the problem into several components that could be individually solved through the use of separate effects experiments, analytical modeling, and engineering calculations. The calculations also identified vital database elements necessary to quantify transport.

Experiments and further analytical studies were undertaken to provide a basis for quantifying debris transport during blowdown, washdown of debris by ECCS water flow, and debris sedimentation on the drywell floor. In particular, three sets of experiments, discussed in Sections 2.1.1.3, 2.1.1.4, and 2.1.1.5, were designed and conducted as part of this study. Detailed CFD simulations were used to determine likely flow patterns that would exist on the drywell floor during ECCS recirculation and the likelihood of debris sedimentation under these conditions.

Transport fractions were estimated for each of the BWR containment designs (i.e., Mark I, Mark II, and Mark III) for a spectrum of postulated accident scenarios. Two major types of piping breaks were studied: main steam line breaks (MSL) and recirculation line breaks (RL). Both throttled and unthrottled ECCS break overflow was considered. Containment sprays were considered to operate intermittently or not at all.

A simplified logic chart method was chosen to integrate the problem subcomponents into a comprehensive study. An example logic chart is shown in Figure 2-24. A separate logic chart was generated for each scenario and for each containment design. Individual steps in the logic charts were solved using available knowledge tempered by conservative engineering judgment. Finally, the logic charts were quantified and the results tabulated.



**Figure 2-23. Schematic Illustrating the Complexity of Drywell Debris Transport**

The logic chart subdivides the problem into five independent steps: (1) LOCA type, (2) debris classification, (3) debris distribution after blowdown, (4) erosion and washdown, and (5) sedimentation in the drywell floor pool. Note that because the debris size distribution was not within the scope of this study, a size distribution from a BWROG study [NEDO-32686] was used in the DDTS in order to illustrate the computation of overall debris transport fractions. Four size classifications are shown in the chart: small, large-above, large-below, and canvassed. Because large debris does not pass through floor grating, the large debris classification was subdivided into debris formed above any grating and debris formed below all gratings. Overall transport fractions were applied to all insulation within the ZOI.

LOCA Type	Debris Classification	Distribution After Blowdown	Erosion and Washdown	Drywell Floor Pool	Path No.	Fraction	Final Location
MARK I CENTRAL ESTIMATE RESI. BREAK RCCS THROTTLED SPRAYS OPERATED FIBROUS INSULATION	Small Pieces 0.22	Advected to Vents			1	1.144E-01	Vents
		Enclosures			2	2.201E-03	Enclosures
		Waterborne			3	6.000E+00	Vents
		Drivell Floor			4	2.201E-03	Floor
		Waterborne			5	1.834E-07	Vents
		Oxidation Damage			6	1.712E-04	Floor
		Adheres			7	1.712E-03	Structures-Above
		Waterborne			8	1.834E-04	Vents
		Sprays/Condensate			9	1.079E-02	Floor
		Adheres			10	1.079E-02	Structures-Break
		Waterborne			11	1.521E-04	Vents
		Sprays/Condensate			12	3.485E-02	Floor
		Adheres			13	1.521E-02	Structures-Other
		Waterborne			14	1.100E-04	Vents
		Sprays/Condensate			15	6.000E-00	Floor
		Adheres			16	3.049E-02	Structures-Break
		Waterborne			17	2.891E-03	Vents
		Sprays/Condensate			18	6.000E-00	Floor
		Adheres			19	2.891E-01	Structures-Other
		Advected to Vents			20	3.461E-02	Vents
		Enclosures			21	4.000E-04	Enclosures
		Waterborne			22	6.000E+00	Vents
		Drivell Floor			23	1.601E-03	Floor
		Waterborne			24	6.000E+00	Vents
		Sprays/Condensate			25	4.000E-06	Floor
		Adheres			26	3.940E-04	Structures-Break
		Waterborne			27	6.000E+00	Vents
		Sprays/Condensate			28	1.000E-01	Floor
		Adheres			29	1.384E-01	Structures-Other
		Canvassed			30	4.000E-01	Structures-Floor
			107	1.000E+00			

Figure 2-24. Sample Drywell Debris Transport Logic Chart

Accordingly, the canvassed classification included intact blankets located within the ZOI. The third column shows where the debris is expected to reside following the end of blowdown. Drywell structures were divided according to location in the drywell: structures located above the containment spray heads, since the sprays cannot reach these structures; structures located directly below the break (which can be subjected to recirculation break flows) and all other structures subjected to sprays but not break flows. Additionally, small debris can be deposited directly onto the floor by mechanisms such as vent capture or entrapment within an enclosure such as the reactor cavity. Large debris generated above any grating was assumed to reside on a grating either below the break or not below the break. Large debris deposited

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above the spray heads or in enclosures was not considered credible. Each branch in the erosion and washdown column simply calculated the amounts of captured debris that remained on the structures after being subjected to the appropriate washdown flows (i.e., recirculation break flow, containment spray flow, and condensate drainage). Similarly, each branch in the drywell floor pool column asks how much of the debris settles to the floor.

### 2.2.3.3 Controlling Phenomena and Plant Features

The determination of which processes/phenomena tends to control the transport of debris depends upon the debris characteristics (i.e., small versus large pieces or covered versus uncovered pieces). Insulation debris can be broadly divided into three size classes: small, large, and large-canvassed. Since each of these debris classifications followed different transport pathways, the analyses considered each classification separately. Small pieces of debris were small enough to easily pass through gratings. Fine particles such as individual fibers or groups of fibers were also considered small debris. Large and large-canvassed pieces of debris were too large to pass through a grating. The large-canvassed debris consisted of sections of intact or relatively intact canvas covered insulation within the ZOI. The large pieces were pieces of relatively intact insulation that were no longer covered by canvas. A medium category was originally considered but there was so little debris generated in this category that it was dropped from further consideration. A few pieces of debris, referred to as agglomerated debris, consisted of small pieces of insulation entangled in a web of canvas fibers, such that the piece transported as a large piece of debris. Sample of small, medium, large, and agglomerated debris were shown in Figure 2-9.

The processes/phenomena that tend to control the transport of small debris are: advection, inertial capture, washdown, and drywell floor pool hydrodynamics. Analyses and experiments suggest that small debris tend to stay fully suspended at airflow velocities higher than 10 ft/s, therefore gravitational settling of airborne debris during the blowdown phase is minimal. During blowdown, the gratings are the most likely locations for debris capture, followed by other structural congestion, vents, and the drywell floor.

The processes/phenomena that tend to control the transport of large debris are: advection of large pieces generated below the lowest grating and through discontinuities in the floor gratings, and erosion of large debris by break flow. Experiments verified that large pieces would not be forced through a grating due to high velocity steam flow, two-phase jet flow typical of a recirculation line break, or prolonged break/spray water flow.

The transport of large canvassed pieces was deemed unlikely either by advection or by erosion. The canvas protected the fibrous insulation from erosion. While, some possibility existed that a large canvassed piece, generated below the lowest grating, could pass through a downcomer vent, it was deemed unlikely that this would happen, based on experimental observations. Therefore, these pieces were treated as non-transportable in the DDTS.

Three plant features were found to control debris transport, these features were: 1) the number and arrangement of gratings with respect to the pipe break, 2) the vent and drywell floor design, and 3) the duration of unthrottled ECCS flow. Experimental data clearly illustrated that during blowdown, the drywell floor gratings provided the largest potential for capture of both small and large debris, with the capture efficiency between 15% and 30% (wetted-grating) for small debris and 100% for large debris (see Section 2.1.4 and Figure 2-10). The small pieces captured on gratings could be easily re-entrained by ECCS water flow during washdown. The only mechanism available for washdown of large pieces is erosion, which was found to be a relatively constant rate process. Therefore, the time assumed for unthrottled operation of ECCS plays a key role in determining the fraction of large pieces that would be washed down. Although vents may provide an effective location for capture during blowdown (10-15% for small debris and >30% for large pieces), the captured debris may become re-entrained depending on

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the drywell pool flow dynamics. Typically, higher flow velocities and turbulence levels characterize pools formed as a result of break overflow. Sedimentation of small or large debris in such pools is unlikely. On the other hand, sedimentation is likely in the pools formed by containment sprays.

### 2.2.3.4 Specific Analytical Studies

Analyses supporting the DDTS included a variety of calculations designed to examine selected specific aspects of the overall problem. These included hand calculations, system level code calculations, and CFD calculations. The following describes the computer code calculations that were performed in support of the DDTS.

#### MELCOR Code Calculations

The MELCOR code was used to examine thermal-hydraulic conditions within the drywell following a postulated LOCA. Insights were obtained regarding containment pressures and temperatures, bulk flow velocities, time required to clear the vent downcomer of water, rate of steam condensation on drywell structures and subsequent thickness of films, rate of accumulation of water on the drywell floor, transport of noncondensable gases to the wetwell. Key observations of these MELCOR calculations included:

- The containment pressures rapidly increased to about 3 atmospheres in about 1 second, corresponding to the clearing of the downcomer vents. Further pressurization was then prevented by the pressure suppression system. After a relatively short period of 5 to 10 seconds, the pressures decreased again.
- The water in the downcomer vent pipes was purged from the pipes in about one second.
- Steam immediately condensed upon contact with surface structures until the temperature of the surface equilibrated with the steam environment. The total rate of condensation within the drywell for the high MSL break, for example, peaked at 1170 lbm/s at about 2.5 seconds.
- Water films with a thickness of 200 to 400 microns accumulated on the structures in as little time as one second, depending upon the location of the surface relative to the pipe break.
- Peak flow velocities as high as 820 ft/s were found near the break and flow velocities through the vent downcomer pipes exceeded 660 ft/s. Elsewhere in the drywell the velocities varied considerably from one location to another.
- The majority of the nitrogen gas initially located in the drywell was forced into the wetwell in about three seconds. The residence time for a tracer gas injected into the drywell along with the break source was generally less than two seconds.
- A pool of water accumulated on the drywell floor and in the reactor cavity sumps as was expected. In the MSL breaks, the pool would not overflow into the downcomer vent pipes, because the depth of the water was only about a quarter of the depth required to overflow. In the recirculation line break (RLB), the results were considerably different. The overflow through the downcomer vent began at five seconds for the low RLB. The asymmetrical pressures acting on the drywell floor pool pushed the accumulated water to the backside of the pedestal from the break and after the drywell pressures peaked, the pool became two-phased. The swollen water level caused the water to overflow into the vents at the backside. The drywell pool, of course, leveled out again after the primary system was depressurized.

### RELAP Code Calculations

Calculations were performed with the RELAP code to characterize the break flow, (i.e., rate of flow and thermodynamic state as a function of time). Following a main steam line break (MSLB), essentially dry steam expands into the containment. The steam mass flow rate falls from an initial value of close to 6,000 lbm/s (assuming blowdown from both ends of the broken pipe) to about 1,000 lbm/s within a period of 50 seconds, while the steam velocity remains essentially at the sonic velocity of about 700 ft/s. Water enters the drywell in the form of fine droplets (approximately 5 microns) of entrained water but the water content is not likely to be large enough to completely wet the debris during their generation.

Following a RLB, the initial flow would be mainly water, but after a period of five to ten seconds, a mixture of water and steam is discharged at high velocities. During this phase, the dynamic pressures far outweigh the corresponding pressures during the initial five seconds after the break. Since the debris generation is proportional to the dynamic pressure, these results suggest that for a RLB most of the fibrous insulation debris will be produced in the later stages of the accident. The total mass flow rate remains fairly high (approximately 20,000 lbm/s) throughout the blowdown phase of a RLB compared to a similar size MSLB; however, the water content of the exit flow is very large. In these conditions, it is expected that all of the structures located in the path of the jet will be drenched with water and the insulation materials in the vicinity of the break are likely to be thoroughly wet prior to the break jet producing significant debris. Additionally, it is likely that the majority of the debris generated will follow the steam component of the break flow rather than following the liquid component. The DDTS assumed that 80% of the debris would be transported with the steam and 20% with the water.

### CFD Calculations

Substantial quantities of insulation debris could land on the drywell floor during the primary system depressurization or be washed down to the drywell floor from drywell structures after being captured during depressurization. From here, the debris could then be transported from the floor into the vent downcomers. Therefore, determining the potential for debris to remain captured on the floor was a necessary step in the overall debris transport study. This determination was made based on simulating the drywell floor pool for a variety of conditions using a commercially available CFD code. The primary objective of this analysis was to evaluate the potential for debris to settle in drywell pools and to estimate fractions of debris that would be transported to the suppression pool. The study considered Mark I, II, and III designs for variations in pool depth and entrance conditions to the pools.

Benchmarking the CFD results to prototypical experimental data was needed in order to correlate pool turbulence levels with conditions that allowed debris to settle. This was accomplished by simulating the ARL Pennsylvania Power and Light Company (PP&L) flume tests with the CFD code and then correlating the code predicted turbulence level for a given test with the test results showing whether or not debris actually settled in that test. The PP&L flume tests are documented in EC-059-1006, "Results of Hydraulic Tests on ECCS Strainer Blockage and Material Transport in a BWR Suppression Pool," 1994, and discussed in Section 3.1.1. Maximum levels of turbulence that allowed debris to settle were determined and applied to the drywell floor pool simulation results. Two maximum levels were determined, one for small debris and one for large debris.

The results of each of the drywell floor pool simulations consisted of graphical pictures showing pool flow behavior such as two and three-dimensional color pictures of flow velocities and flow turbulence in the form of specific kinetic energy. These turbulence levels were then compared to the maximum levels for debris settling determined by the code calibration. If pool turbulence were higher than a maximum level, then debris would not likely settle. An example flow simulation is shown in Figure 2-25. The figure shows velocity contours (lines of equal velocity), for one-half of a Mark I drywell floor pool. On

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the basis of this graphical data, engineering judgment was applied to determine the likelihood for debris settling for each pool configuration. With noted design-specific exceptions, drywell floor pools formed by recirculation break flows are considered likely to transport the majority of insulation debris into the vent downcomers and pools formed by the containment sprays are likely to retain debris.

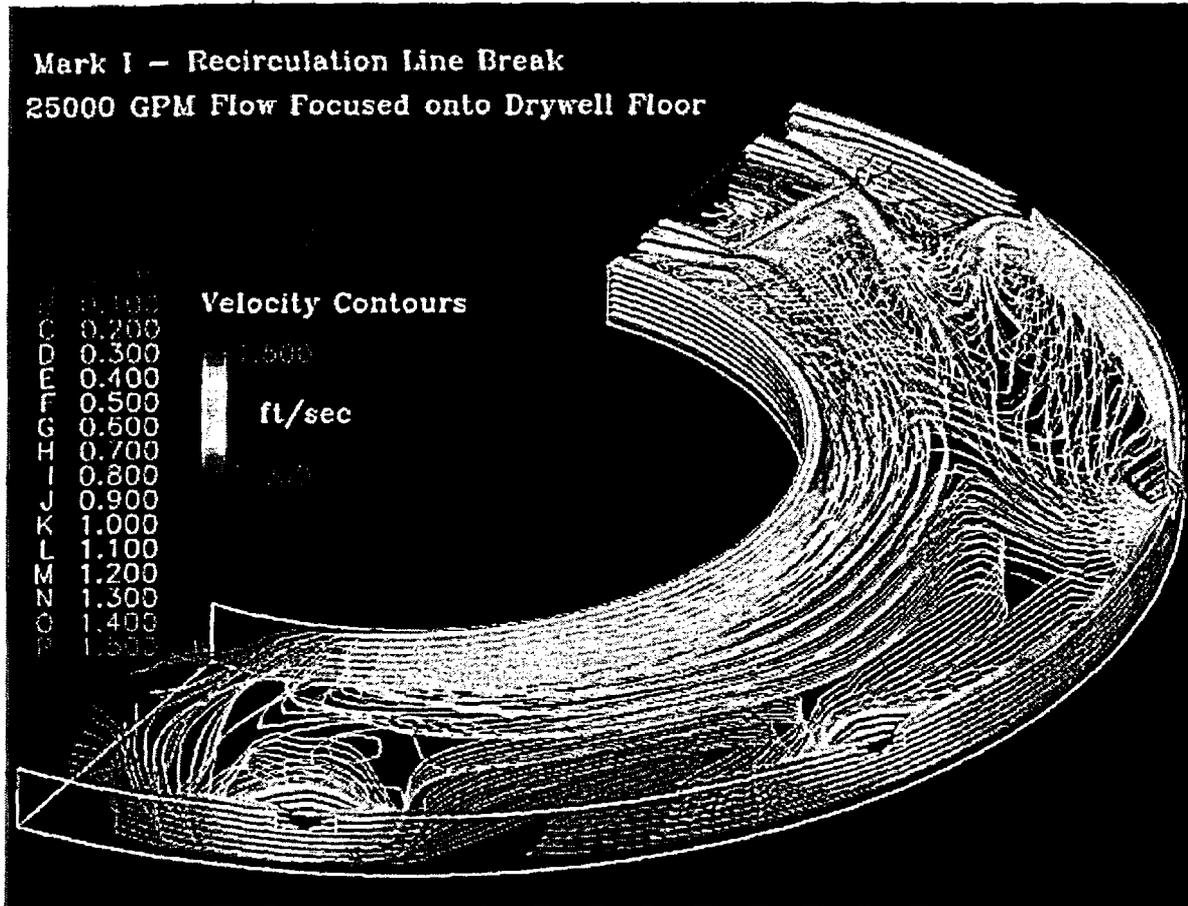


Figure 2-25. CFD Simulation of Mark I Flow Patterns

### 2.2.3.5 Debris Transport Quantification Results

A summary of the upper bound and central estimate transport fractions for a postulated LOCA in the mid-region of the drywell are presented in Tables 2-2 and 2-3 for the main steam line breaks and the recirculation line breaks, respectively. A complete set of results can be found in NUREG/CR-6369.

The central estimate transport fractions shown in Table 2-2 are the fractions for the MSLB scenarios where the operators throttle the ECCS back to the steaming mode and the containment sprays are operated intermittently. This scenario was chosen for summary purposes because it is the most likely scenario that operators would follow. Conversely, the upper bound estimate transport fractions in Table 2-2 are the fractions for the MSLB scenarios where the ECCS is not throttled back to the steaming mode and the sprays are operated. This scenario was chosen for the upper bound estimate because it represents the worst-case scenario in terms of debris transport. Similarly, the transport fractions shown in the Table 2-3

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summary for RLB scenarios are those for ECCS throttling and spray operation for the central estimates and no throttling and spray operation for the upper bound.

Transport fractions corresponding to Tables 2-2 and 2-3 for all of the insulation initially located within the ZOI was provided in Table 2-4. These transport fractions were determined using the BWROG debris size distribution of 0.22, 0.38, and 0.40 for small, large, and canvassed debris. The large debris was then further subdivided into large-above and large-below using engineering judgment. These subdivisions were 80% and 90% above the grating for the central and upper bound estimates, respectively.

**Table 2-2: Study Transport Fractions for Main Steam Line Breaks**

Plant Design	Central Estimate			Upper Bound Estimate		
	Small Debris	Large Debris		Small Debris	Large Debris	
		Above	Below		Above	Below
Mark I	0.52	0.01	0.90	1.0	0.05	1.0
Mark II	0.74	0.01	0.90	1.0	0.05	1.0
Mark III	0.55	0	0.90	0.93	0.03	1.0

**Table 2-3: Study Transport Fractions for Recirculation Line Breaks**

Plant Design	Central Estimate			Upper Bound Estimate		
	Small Debris	Large Debris		Small Debris	Large Debris	
		Above	Below		Above	Below
Mark I	0.86	0.02	0.94	1.0	0.30	1.0
Mark II	0.89	0.02	0.95	1.0	0.30	1.0
Mark III	0.72	0.01	0.90	1.0	0.30	1.0

**Table 2-4: Study Transport Fractions for All Insulation Located in ZOI**

Plant Design	Main Steam Line Break		Recirculation Line Break	
	Central	Upper Bound	Central	Upper Bound
Mark I	0.15	0.31	0.23	0.39
Mark II	0.20	0.31	0.24	0.39
Mark III	0.16	0.29	0.20	0.39

Several general conclusions can be drawn from these results:

- The total fraction of debris transported depends strongly on the assumed size distribution of the debris and the location of the break.
- Small debris readily transport towards the vents entrances with a substantial amount captured primarily by the gratings.
- A majority of the large debris generated above any grating is not likely to transport to the vents.
- A majority of the large debris generated below all gratings will likely transport into the vents.

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The study concluded that the URG-recommended transport fractions for Mark II containments underestimate debris transport. For Mark I and Mark III drywells, the study concluded that the URG appears to provide reasonable estimates, provided the plant contains a continuous lower grating with no large holes. On the other hand, while the RG 1.82, Rev. 2 recommended assuming 100% transport of transportable debris was found to provide a reasonable upper bound for breaks located below the lowest grating, the recommendation greatly overestimates debris transport for breaks located above the lowest grating. Finally, the study concluded that licensees should pay close attention to plant features that are unique to their plant and how they were modeled in this study. If necessary, the logic charts provided in this study can be easily modified to account for plant-specific features, such as number and arrangement of floor gratings. Also, they are flexible enough to accommodate new evidence and assumptions related to debris size and distribution.

### Documentation

The drywell debris transport study is documented in the three-volume report, NUREG/CR-6369. The main volume, Volume 1, summarizes the overall study, in particular, the debris transport quantification and transport fractions. The experiments conducted specifically to support this study are documented in detail in Volume 2. The analyses conducted specifically to support this study are documented in detail in Volume 3. The DDTs reports provide reasonable engineering insights that can be used to evaluate the adequacy of debris transport fractions used in the utility strainer blockage analyses.

#### **2.2.4 Reliance on Containment Overpressure Credit**

The NRC was concerned that licensees would take new credit for containment overpressure to meet containment heat removal and ECCS pump NPSH requirements. Therefore, the staff evaluated its position on use of containment overpressure in calculating NPSH margin. The staff's position is that small amounts of overpressure credit may be granted by the NRC when justified.

On October 7, 1997, the NRC staff issue Generic Letter 97-04, "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps," to all holder of operating licenses for nuclear power plants. The staff's concerns leading to the issuance of GL-97-04 illustrated an existing uncertainty and variability in the application of the methods used to calculate NPSH margin. The staff was concerned that the NPSH available for ECCS and containment heat removal pumps may not be adequate under all design-basis accident scenarios. Specifically, the staff was concerned that changes to plant configuration, operating procedures, environmental conditions, or other operating parameters over the life of the plant could result in inadequate NPSH. Some licensees discovered that they must take new credit for containment overpressure to meet the NPSH requirements of the ECCS and containment heat removal pumps and the overpressure being credited by licensees may be inconsistent with the plant's respective licensing basis. Generic Letter 97-04 requested that addressees provide current information regarding their NPSH analyses. A review of the industry submittals [SEA97-3705] confirmed the basis for these concern. There is a substantial amount of uncertainty associated with the strainer clogging issue, and as a result, the staff did not recommend licensing basis changes as a "resolution option."

##### **2.2.4.1 Summary GL-97-04 Submittals**

The comments received in response to GL-97-04 were reviewed to determine the level of utility reliance on overpressure for an adequate NPSH margin, and for general trends and insights into compliance to with regulatory guidance and approved methodologies. GL-97-04 requested information from all holders of operating licenses for operational nuclear power plants, except those that have permanently ceased operations and certified that all fuel had been permanently removed from the reactor vessel. GL-97-04

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specifically requested information necessary to confirm the adequacy of NPSH available for ECC and containment heat removal pumps. It should be noted that BWR plants were into the strainer replacement process in response to NRC Bulletin 96-03 at the time this information was requested and that NPSH analyses supporting strainer replacements could alter the information received in response to GL-97-04.

The following insights regarding BWR plants were drawn from the review:

- BWR licensees generally interpreted regulatory guidance (RG 1.1, RG 1.82, and the SRP) correctly.
- All NPSH analyses were based on the design basis accident (DBA) LOCA. A few plants analyzed a small LOCA in addition to the DBA LOCA. None of the analyses included non-LOCA scenarios, e.g., transient scenarios.
- Most of the BWR plants indicated that their design basis was still RG 1.82, Rev. 0. Note that Rev. 0 requires NPSH analyses to consider partial loss of screen area, rather than the more uniformly covered strainers typical of fibrous debris deposition.
- Because most plants still based their analyses on RG 1.82, Rev. 0 and because Rev.0 did not address air ingestion (or vortex suppression), most plants had not addressed this issue.
- The review suggested that licensees had significantly changed their NPSH calculations since their last NRC review. In some cases, changes included taking credit for containment overpressure without documented minimum pressure analyses that confirmed the availability of the credited pressure.
- Ten BWR plants with Mark I containments explicitly took credit for containment overpressure above the vapor pressure corresponding to suppression pool maximum temperature. The overpressure credit for four of those plants exceeded 6 psi with one of those plants crediting 9 psi. In addition, one BWR took credit for operating with a negative NPSH margin. Plant confirmatory analysis did not appear consistent with guidance provided in Containment Systems Branch (CSB) 6-1. CSB 6-1 provides guidance in the performance of a minimum containment pressure analysis.

### 2.2.4.2 Technical Assessment

The technical evaluation supporting GL-97-04 [SEA97-3705] illustrated the additional uncertainty associated with overpressure analysis. Overpressure analysis must be rather detailed and comprehensive to ensure a conservative determination of the minimum containment pressure available for credit in NPSH analyses. All means of removing heat from the containment must be considered including all installed pressure-reducing systems and processes. These systems and processes include heat transfer to structures, containment leakage, containment sprays, pool surface heat and mass transfer, fan coolers, RHR heat removal heat exchangers, and power conversion systems. Because the NPSH is strongly dependent upon the accident scenario, a comprehensive range of accident scenarios must be examined to ensure that a conservative minimum pressure is determined for the purpose of granting overpressure credit. In fact, the ACRS recommended that the decision making process consider the time variation of NPSH for a broad range of accident sequences such as typically found in a probabilistic risk assessment [ACRS Letter from R. L. Seale, Chairman of ACRS to The Honorable Shirley Ann Jackson, Chairman of U. S. Nuclear Regulatory Commission, "Credit for Containment Overpressure to Provide Assurance of Sufficient Net

## **NRC Sponsored Research**

Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps," December 12, 1997].

An overly simplified analysis is not likely to predict a conservative minimum containment pressure. Time-dependent analysis is needed to complete two aspects of NPSH analysis, i.e., the calculation of the maximum pool temperature and the calculation of the minimum available containment pressure. The time-dependent analysis for determining the maximum pool temperature can be greatly simplified by conservative assumptions, such as ignoring the effects of heat transfer to structures or neglecting non-safety rated systems. However, the time-dependent analysis to determine the minimum available containment pressure cannot be simplified by neglecting either pressure reducing systems or processes, rather the required calculations must be comprehensive and detailed. These calculations must consider a complete spectrum of applicable accidents scenarios, transients as well as LOCAs, because it is not reasonable possible to predetermine the worst-case scenario with respect to minimum pressure.

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# **NRC Review of Industry and International Sponsored Research**

## **3.0 NRC REVIEW OF OTHER RESEARCH**

In addition to the NRC-sponsored research, NRC evaluations and decision-making related to the BWR strainer blockage issue have also relied upon data and analyses compiled by U.S. nuclear industry and international organizations. Publicly available information from these sources were reviewed by the NRC and, in some cases; incorporated into other NRC sponsored research. The following sections summarize some of the key information utilized by the staff.

### **3.1 NRC Compilations and Analysis of U. S. Industry Data**

#### **3.1.1 Susquehanna Blockage & Transport Tests**

In 1994, Pennsylvania Power and Light Company (PP&L) sponsored tests conducted at the ARL to investigate issues relating to plugging of suppression pool suction strainers for ECCS pumps in BWR power plants [PP&L]. These tests, commonly referred to as the PP&L tests, were conducted in the following two phases:

- Phase 1 involved material transport tests performed to quantify the transport velocities and turbulence required to keep debris suspended in water where it could contribute to strainer plugging.
- Phase 2 involved the investigation of strainer head loss due to an accumulation of NUKON™ insulation debris with and without particulate debris.

#### Phase 1 Test Objective/Scope

The transport tests were conducted to investigate the transport characteristics of the various materials found in the Susquehanna Steam Electric Station, Units 1 and 2. The tests were conducted in a linear water flume, and were designed to determine whether fluid velocities similar to those expected in the suppression pool would keep materials of interest suspended. The test conditions were similar to those expected in the suppression pool when flow is induced by ECCS injection and the circulation of water from the suppression pool to the reactor with water returning to the suppression pool via the drywell downcomer vents. No attempt was made to test the type of flow and turbulence created by steam blowdown into the suppression pool. The transport tests provided a basis for determining how much material will settle to the pool floor where it would not be available to contribute to strainer plugging in the long term.

The transport of material over a weir was also investigated. Tests were conducted to quantify flow rates required to draw the different debris types over a weir acting as a barrier to debris transport. This data was useful in assessing whether debris would remain on the drywell floor or be drawn over the drywell downcomer weir by recirculating water flow spilling out of the broken pipe in a LOCA scenario.

The materials tested in the water flume included: NUKON™ insulation debris, inorganic-zinc paint particles and flakes, iron oxide rust chips, iron oxide particulate, RMI, and Koolphen K vapor barrier foil paper.

#### Phase 2 Test Objective/Scope

Strainer head loss tests were conducted to determine the head loss resulting from an accumulation of fibrous and particulate debris. Tested materials included NUKON™ insulation debris, paint chips and

# **NRC Review of Industry and International Sponsored Research**

rust, and sludge. A 1/4-scale ECCS T-strainer model was used to correlate strainer head loss with debris accumulation and test the effectiveness of backflushing strainers with air and nitrogen.

The test matrix was designed to provide head loss data as a function of material accumulation on the strainer and the approach velocity. Approach velocities ranged from 0.67 to 0.96 ft/s. The head loss tests were conducted using NUKON™ insulation debris (the primary material with potential to produce strainer plugging at Susquehanna) with or without prototypical sludge. The sludge consisted of iron-oxide particulate with a density of approximately 300 lbm/ft<sup>3</sup> and an average particle size less than 50 microns.

## **Phase 1 Test Apparatus and Instrumentation**

The test flume had a rectangular cross-section measuring 22-inches wide, 16-inches deep, and 18-ft in length. The flume had one glass side to allow visualization of debris movement. Water was introduced at the upstream end of the flume and then passed through flow straighteners to remove turbulence prior to entering the test section. The influence of turbulence, such as that caused by return flow through downcomers to the suppression pool, on debris suspension was investigated by discharging jets downward into the flume beneath the water surface. The downward jets were introduced via three 1-inch pipes distributed along the flume length. The weir was placed at the end of the flume for those tests involving a weir.

## **Phase 2 Test Apparatus and Instrumentation**

The test strainer drew water from a steel test tank that was designed to keep material suspended and well mixed in order to provide a uniform debris concentration to the strainer. The tank was 5-ft wide, 16-ft long, and 9-ft high with one side made of glass panels for visualization. The tank was sectioned into two 8-ft lengths with one section used for these tests. The water depth was maintained at approximately 6-ft resulting in a water volume of approximately 240 ft<sup>3</sup> in the active section of the tank.

A 1:4 geometric scale model of one of the RHR strainers was constructed with its size, shape, and orientation all simulated to the selected scale. The strainer holes were prototypically 1/8-inch in diameter. The total surface area of the strainer was approximately 2.7 ft<sup>2</sup>.

A centrifugal pump taking suction from the tank through the strainers circulated water back into the tank. The water rate was measured using a calibrated orifice plate in the loop piping. Constant flow water circulation drew debris onto the strainer where the head loss versus time was measured and recorded. Tests were conducted at two flow rates giving the strainer approach velocities of 0.67 ft/sec corresponding to a containment spray pump and 0.96 ft/sec corresponding to an RHR pump.

Water samples were taken at regular intervals to provide data on sludge concentrations. The accumulation of sludge on the strainer was derived from the measured decay in sludge concentration within the tank.

## **Phase 1 Test Results**

Material transport properties were observed in the flume; specifically, whether or not debris settled at a given flow velocity and turbulence level. For the debris and conditions tested, it was found that the heavier debris such as paint flakes, rust chips, and RMI readily settled on the bottom of the test rig. Accordingly, it was concluded that these same debris types would likely settle to the suppression pool floor following the completion of the LOCA steam blowdown phase and turbulent conditions in the

## **NRC Review of Industry and International Sponsored Research**

suppression pool subside. It was further concluded that some of the sludge material will settle to the pool floor but most will remain suspended when water flow velocities exceed 0.3 ft/sec. The NUKON™ debris was readily entrained and remained suspended with relatively little turbulence.

### Phase 2 Test Results

Plots of strainer head loss versus time were recorded for each test. The combination of fibrous debris with sludge resulted in larger strainer head losses, when compared to fibrous debris alone. When sludge was introduced along with fibrous debris, the head loss increased dramatically. In fact, strainer plugging occurred with only 0.25-inches of debris on the strainer with a combined fiber/sludge debris bed. The effect of sludge accumulation on head loss was both dramatic and difficult to correlate. Debris accumulation on the strainer tended to be uniform. Sludge passed through the strainer until sufficient insulation debris accumulated to effectively filter out the sludge particles.

### NRC Review

The NRC staff reviewed the PP&L test data and used the data to support other NRC sponsored research. The PP&L strainer head loss data was used to further validate the NUREG/CR-6224 compressible fiber/particulate bed head loss correlation.

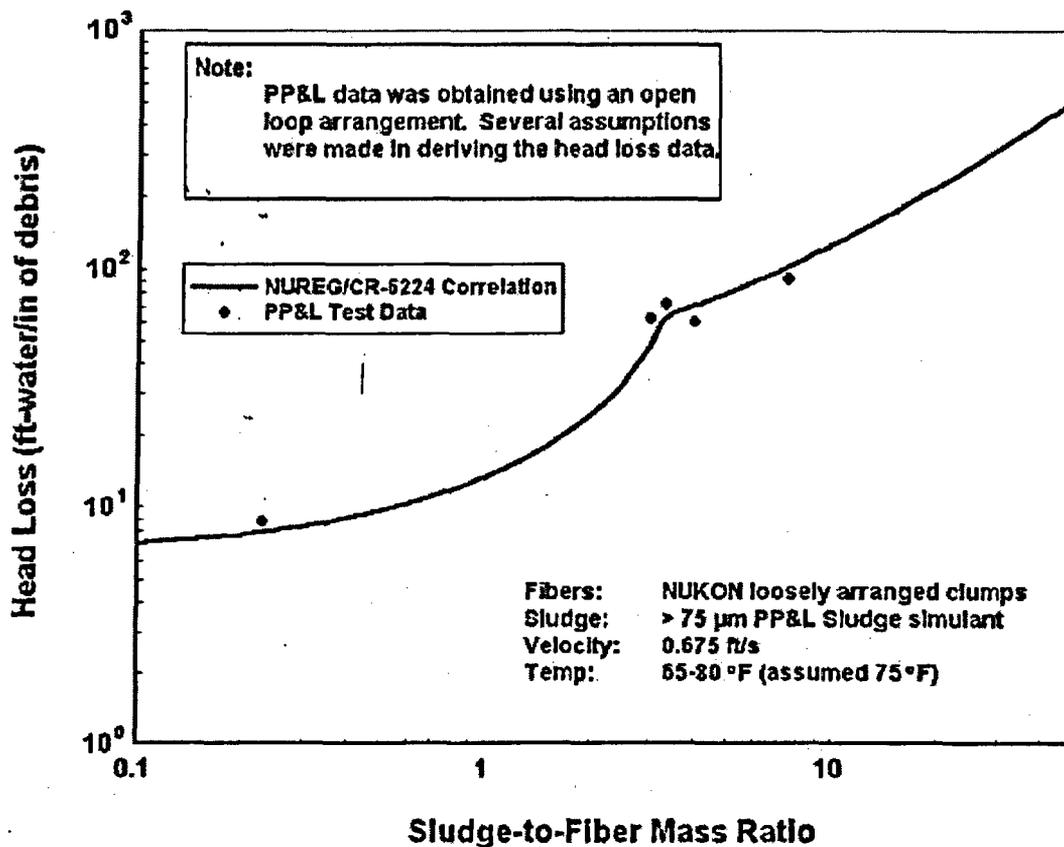
The PP&L head loss data was obtained using a once-through facility. In these tests, a predetermined quantity of sludge was added to the mixing tank along with a known quantity of fibers. No additional sludge was added during the experiment, but additional quantities of fibrous material were added to maintain a certain fiber concentration level in the tank. The fibrous materials were characterized as fibers and the sludge was characterized as coarse particulates with a size distribution ranging from 75 microns to 3 mm. Head loss across the strainer was measured as a function of time. The tests were terminated once the head-loss approached 22 ft-water (0.07 MPa). The head loss measurements as a function of time were correlated against the fiber and sludge loadings on the strainer surface. The sludge and fiber loadings were calculated assuming a filtration efficiency of 1 for both fibers and particulate sludge. Considering that these filtration efficiencies have only been achieved with thicker beds, it is reasonable to assume that better agreement would be obtained closer to the end of the experiment.

The comparison of the NUREG/CR-6224 correlation with the test data is shown in Table 3-1 and in Figure 3-1. Good agreement between the experiment and the model is observed.

**Table 3-1. Comparison of NUREG/CR-6224 Correlation with PP&L Head Loss Data**

Test	Time (Min)	Approach Velocity (ft/sec)	Insulation Thickness (ft)	Sludge-to-Fiber Mass Ratio	Head Loss PP&L ft-water	Head Loss Correlation ft-water
26	6.5	0.65	0.033	3.37	28.1	28.31
27	22.7	0.65	0.098	0.07	21.7	11.5
29	40.5	0.67	0.021	7.62	22.9	26.03
31	4.8	0.629	0.041	9.9	27.9	61
32	4.0	0.593	0.037	3.04	27.8	27.7
33	24.3	0.67	0.25	0.23	26.3	23.7
34	5.4	0.84	0.028	4.06	19.9	23.75

## NRC Review of Industry and International Sponsored Research



**Figure 3-1. Comparison of NUREG/CR-6224 Correlation with PP&L Head Loss Data**

The PP&L flume test data were used to calibrate the drywell floor pool CFD calculations in the DDTS study (see Section 2.2.3) [NUREG/CR-6369]. In other words, the maximum turbulence levels, as predicted by the code, that would allow fibrous insulation debris to settle were determined by comparing the code predicted turbulence levels in the flume test simulations to experimentally determined debris settling results. The simulations of the ARL PP&L flume tests are reported in Appendix A of NUREG/CR-6369, Vol. 3. The following is a brief summary of the results of those simulations.

Several of the ARL PP&L flume tests, that tested the transportability of fibrous insulation debris, were considered to be applicable to the DDTS study, because the test conditions were prototypical of a BWR drywell floor. The flume used in these tests was 22 inches wide, 16 inches, deep, and 18 ft long. A weir wall, one foot high, was installed at the end of the flume to simulate flow over the top of the downcomer vent pipes. Flow velocities for debris transport ranged up to 1 ft/sec. Flow turbulence levels were controlled using flow straighteners on the main inlet flow and small downcomer pipes that injected turbulent flow at specified positions and flow rates. These tests were considered prototypical because of the pool depth, the flow velocities and turbulence levels, and the type and sizes of debris studied. These parameters were in the range of expected parameters for the drywell floor pool in Mark I and Mark II plants. The results of the CFD simulations of the flume tests are summarized in Table 3-2.

The conclusions drawn from the flume test simulations regarding debris transport in a drywell pool were:

## NRC Review of Industry and International Sponsored Research

- If the CFD code predicted value for specific kinetic energy was greater than about  $0.01 \text{ ft}^2/\text{sec}^2$ , then both large and small debris would remain suspended and well mixed in the drywell floor pool.
- If the predicted value was less than about  $0.001 \text{ ft}^2/\text{sec}^2$ , then all debris would settle to the drywell floor with settling velocities akin to the settling velocities measured for insulation debris settling in still water.
- If the predicted value was between  $0.001$  and  $0.01 \text{ ft}^2/\text{sec}^2$ , then the large debris would settle but the small debris would remain suspended.

These conclusions are summarized in Table 3-3.

**Table 3-2: Results of the CFD Simulations of the ARL PP&L Flume Tests**

<i>est</i> No.	Flume Transport Flow Velocity (ft/sec)	Turbulence Introduced by Downcomer Pipes	Weir Wall Used	Debris Transport Results		CFD Code Predicted Turbulence Level ( $\text{ft}^2/\text{sec}^2$ )
				Small Pieces	Large Pieces	
1	0.27	No	No	Settled	Settled	K.E. < 0.0012
2	0.56	No	No	Settled	Settled	K.E. < 0.0012
3	1.00	No	No	Transported	Settled	$0.0012 < \text{K.E.} < 0.014$
4	0.27	Yes	No	Transported	Settled	$0.0012 < \text{K.E.} < 0.014$
5	0.56	Yes	No	Transported	Transported	K.E. > 0.014
6	0.27	No	Yes	Settled	Settled	K.E. < 0.0012
7	0.56	No	Yes	Transported	Settled	$0.0012 < \text{K.E.} < 0.014$

**Table 3-3: Debris Behavior Based on Turbulence Levels**

Specific Kinetic Energy ( $\text{ft}^2/\text{sec}^2$ )	Behavior of Small Debris	Behavior of Large Debris
K.E. < 0.001	Settles	Settles
$0.001 < \text{K.E.} < 0.01$	Suspended	Settles
K.E. > 0.01	Suspended	Suspended

### Documentation

The PP&L tests are documented in detail in EC-059-1006, Rev. 0, "Results of Hydraulic Tests on ECCS Strainer Blockage and Material Transport in a BWR Suppression Pool" [PP&L]. The comparison of the NUREG/CR-6224 compressible fiber/particulate bed head loss correlation with the PP&L strainer head loss data was reported in Appendix B of NUREG/CR-6224. The CFD simulations of the ARL PP&L flume tests are reported in Appendix A of NUREG/CR-6369, Vol. 3.

# **NRC Review of Industry and International Sponsored Research**

## **3.1.2 BWROG Head Loss Tests**

The BWR Owners Group (BWROG) conducted head loss tests to gather data on alternate ECCS suction strainer designs as a possible resolution to the strainer-clogging problem. The strainer head loss tests were conducted at the Electric Power Research Institute (EPRI) non-destructive evaluation (NDE) center in Charlotte, North Carolina. Supplemental tests to determine the effects of individual debris components on head loss and combinations of debris components were conducted at Continuum Dynamics, Inc. (CDI) in Princeton, New Jersey.

### Test Objective

The overall objective of the full-scale test program was to develop and test strainer concepts that could be utilized to resolve the strainer clogging issue. Three specific concepts were evaluated: high-capacity passive strainers, strainer backflushing, and an active self-cleaning strainer. Testing was also conducted on a truncated cone to provide a baseline for comparison. For the passive strainers, the primary objective was to determine the capacity of each strainer to accumulate debris without clogging. The primary objective of the backflushing tests was to determine the effectiveness of removing accumulated debris from the strainer surfaces by reversing flow through the strainer. The primary objective of the self-cleaning strainer was to determine its performance under a variety of debris loading conditions.

The primary objective of supplemental gravity head loss testing at CDI was to determine the relative increase in head loss resulting from the addition of specific debris types to a bed of insulation fiber, corrosion products, and/or RMI. In addition, the gravity head loss testing evaluated the different types of stainless steel and aluminum RMI.

### Test Scope

Seven passive strainers and one active self-cleaning strainer were tested to obtain pressure loss and performance data as a function of debris type, debris quantity, flow rate, and time. The tested strainers were: 1) the truncated cone design, 2) the 20-point star design, 3) the 60-point star design, 4) 2/3 of the 60-point star design (i.e., sheet metal covered 1/3 of 60-point star), 5) prototype #1 of the stacked-disk design, 6) prototype #2 of the stacked-disk design, and 7) the stacked disk section of the self-cleaning strainer design (passive mode). For passive strainers, tests were conducted to evaluate the maximum fiber and corrosion product capacity, the effect of thin fiber beds, the feasibility of backflushing and the effect of RMI on head loss. Tested debris included: prototypical fibrous insulation, RMI, and simulated corrosion products, and miscellaneous debris. The active strainer was tested to evaluate its ability to maintain a clean strainer surface area under various debris loadings at design flow rates and its start up capability after a period at a minimum flow condition.

Gravity head loss tests were conducted to quantify the effect of miscellaneous debris, such as paint chips and sand, when combined with fibrous insulation and/or RMI. Gravity head loss tests were conducted with two types of stainless steel RMI and two types of aluminum RMI to examine the effects of different materials on head loss.

### **Test Apparatus and Instrumentation**

Two centrifugal pumps connected in parallel with a combined capacity of 10,000 GPM pumped water from a 50,000-gallon tank and subsequently returned the flow to the tank. The test strainer was attached to the pump suction inlet piping. Strainers could be mounted with either vertically or horizontally. Aligning one pump to pull water from the tank through alternate suction piping and then discharging the water back through the test strainer performed the strainer backflush operation.

## **NRC Review of Industry and International Sponsored Research**

The primary measurements for these tests were: 1) strainer head loss, 2) system flow rate, 3) plow/brush rotation rate and strainer torque on the self-cleaning strainer, and 4) the masses of insulation debris, corrosion products and other debris introduced into the vessel.

### **BWROG Test Results**

The BWROG arrived at a number of general conclusions. For fibrous debris testing these conclusions were:

- Corrosion products, when mixed with fibrous insulation, greatly increased the head loss over that of fibrous insulation by itself. This reaffirms the results of the PP&L tests (see Section 3.1.1) and the NRC-sponsored tests at ARL (see Section 2.1.1.1)
- Lower approach velocities produce lower head losses. Over the range of flow rates and strainer sizes tested, the head loss increased nonlinearly with increases in velocity.
- The addition of miscellaneous debris can also create significant increases in head loss as compared to fiber alone. Supplemental gravity head loss testing quantified the effects of individual debris types.
- Thin debris bed tests indicated a fibrous bed thickness slightly greater than 1/8-inch was sufficient to cause high head loss on the truncated cone but not the alternate strainer designs.
- The measured amount of fibrous NUKON™ insulation that passed through the truncated core-strainer was 0.4% of the total fiber in the tank for a specific flow rate and strainer head loss.
- Passive strainers with improved performance over existing designs were identified. These strainers can collect significant amounts of fibrous insulation and corrosion products with acceptable head loss at the flow rates of interest for BWR ECCS.

The summarized results for RMI testing are:

- Tests with RMI indicated that RMI collecting on a strainer reached some maximum or saturation quantity after which further RMI is not retained on the strainer. Specifically, at some radius of the debris bed, the settling velocity of the RMI foils exceeds the strainer approach velocity effectively preventing further accumulation of RMI debris on the strainer.
- Below a given approach velocity, RMI falls off the strainer (this approach velocity depends upon the RMI settling velocity).
- When the strainer head loss is predominantly due to fibrous debris and corrosion products, RMI in combination with this debris produces approximately the same head loss as the other debris alone.

The summarized results for backflushing are:

- The truncated core strainer was successfully backflushed under all conditions.

## **NRC Review of Industry and International Sponsored Research**

- Although some relief was obtained for the 60-point star and the stack-disk strainer designs tested, debris was not adequately removed at flow rates up to the maximum backflushing 5,000-GPM flow when fibrous insulation was used.
- With the exception of some RMI wedged in the internal portions of the stars of the 60-point strainer, the RMI by itself was successfully removed by shutting off pump suction flow (i.e., no backflush required).

The summarized results for self-cleaning testing are:

- The active front portion of the strainer was kept clean for all debris types and loadings tested at the design flow rate of 5,000-GPM. The head loss across the strainer was found to be essentially constant at a given flow rate and independent of the debris loading.
- It is possible that sufficient debris can accumulate on the active portion of the strainer under a low-flow start-up condition to prevent subsequent plow/brush rotation at design flow rates.
- Although the strainer maintained a clean front surface, the head loss across the clean strainer and the torque generated by the turbine were higher than expected.

The summarized results of the gravity head loss testing with miscellaneous debris are:

- Constants for determining relative increases in head loss were generated for eight different types of debris in combination with three types of fibrous insulation.

### NRC Review Conclusions

The BWROG devoted considerable resources to explore various generic designs for large passive strainers that could be used to replace the existing truncated cone strainers. The NRC noted that the BWROG obtained head loss data for each design at various combinations of fibrous insulation debris, RMI insulation debris, sludge, paint and concrete chips, and miscellaneous debris. The NRC staff agreed that the general characteristics (size, shape, etc.) of the debris tested were consistent with those tested in the NUREG/CR-6224 study. The staff further noted that the NUREG/CR-6224 study selected debris with characteristics designed to maximize the resulting head loss.

One important NRC staff of the BWROG tests was that reasonable steady-state conditions were not achieved in a significant number of the tests. This is important because the amount of debris on the strainer was deduced from known quantities of debris introduced into the water tank by assuming that essentially all of the debris was deposited onto the strainer when steady head loss was achieved. Therefore, the debris bed composition was relatively unknown during transient conditions.

The BWROG developed two correlational methods based on these test data that can be used to estimate head loss across the strainers. The first method provided a non-dimensional head loss correlation that could be used to estimate head loss across an alternate strainer design valid at lower debris loadings. The second method provides a six-step process for estimating the strainer's RMI capacity and head loss across RMI debris beds. The NRC staff conducted confirmatory calculations to validate the BWROG calculational procedures and to examine their applicability to the actual plant conditions. The staff found the URG to contain valuable and useful data for predicting strainer head loss; however, the staff's review revealed several concerns regarding the quality and applicability of these data. On the basis of these analyses, the staff concluded that the head loss correlation in the URG is unreliable and incomplete for

## **NRC Review of Industry and International Sponsored Research**

plant analyses, and is, therefore, unacceptable. The staff strongly recommended that utilities use vendor-provided data to qualify strainer designs, rather than relying on the correlations and calculational procedures specified in the URG. In addition, the staff recommended that licensees' designs should be able to accommodate experimental uncertainties associated with correlations and/or calculational methods developed by the vendors. These confirmatory calculations are discussed in more detail in Section 4.4.

### Documentation

The BWROG strainer head loss tests are documented in Volume I: Technical Support Documentation of NEDO-32686, "Utility Resolution Guidance for ECCS Suction Strainer Blockage." The NRC review comments are documented in a Safety Evaluation Report (SER), August 20, 1998 [NRC-SER-URG].

### **3.1.3 GE Stacked Disk Strainer Testing**

General Electric (GE) supplied an advanced passive stacked-disk strainer to the nuclear industry that was designed to alleviate the strainer blockage problem. The GE design (proprietary) offered an improvement over the conventional stacked-disk strainers tested by the BWROG (see Section 3.1.2). A relatively large cavity volume was designed into the GE strainer to accommodate larger volumes of insulation debris without a substantial increase in the head loss. Each GE strainer would be designed specifically to suit a particular plant application to meet specific requirements for the estimated debris and hydrodynamic loadings.

The NRC reviewed the GE's Licensing Topical Report (LTP) [NEDC-32721P], "Application Methodology for GE Stacked-Disk ECCS Suction Strainer," dated December 23, 1998, and associated documents. The NRC's review is documented in LANL Technical Evaluation Report LA-CP-99-7, "Technical Review of GE LTR NEDC-32721P: Application Methodology for GE Stacked-Disk ECCS Suction Strainer," dated December 23, 1998. The GE application methodology included: 1) hydraulic performance design methodology and 2) procedures for calculating hydrodynamic loads for new strainer installations that can be used in the structural analysis of the torus penetration, the strainer supports, and the strainer itself. GE applied this methodology to design replacement ECCS suction strainers in response to NRC Bulletin 96-03. The NRC reviewed the topical report focusing on determining whether the overall methodology captured all the important plant phenomena and whether the methodology is generically acceptable for designing strainers. Confirmatory analyses were performed as part of this review.

### GE Program

GE fabricated a prototype strainer and tested its hydraulic performance at the EPRI NDE Center. The facility and testing procedures were the same as those used in the BWROG test program. The tests involved both fibrous debris and RMI debris. In each test, predetermined quantities of fibrous debris, corrosion products, and RMI debris were added to the test tank and kept in suspension by pumped-flow recirculating flow patterns. Sufficient time was allowed for debris to accumulate on the strainer surface, and then the head loss was measured at varying flow velocities. The objective was to examine the effect of velocity on debris bed compression without the results being affected by filtration. The actual quantity of debris deposited on the strainer surfaces was not directly measured.

GE sought an empirical approach to correlate the experimental data obtained for fiber and corrosion product mixtures. The GE correlation was intended for application within the range of tested parameters and GE noted three limitations to their correlation. These are:

- It is applicable only to NUKON™ insulation.

## **NRC Review of Industry and International Sponsored Research**

- The distance between the stacked disks must be greater than a specified gap width.
- The ratio of the outer strainer diameter to the diameter of the suction flange should be similar to that of the prototype strainer tested.

GE planned to follow the BWROG URG methodology for RMI debris beds and to use bump-up factors to account for miscellaneous debris. The GE topical report does not discuss the applicability of their head loss correlation to other types of debris (e.g., Temp Mat and Min-K).

### NRC Review of the GE Program

The NRC reviewed the GE methodology (GE LTR NEDC-32721P) for determining the head loss across GE stacked disk strainers. In addition, the NRC sponsored two sets of confirmatory analyses to evaluate the GE head loss methodology. In the first analysis, the NRC examined: 1) the actual range of experimental parameters explored in the GE tests and compared the parameters with those of the proposed plant applications, and 2) the process used to develop the correlation and the generic acceptability of the correlation. The second set of calculations compared GE test data with the predictions of a modified version of NUREG/CR-6224 correlation. This effort was used to draw inferences regarding bounds within which usage of GE correlation is acceptable.

Based on the NRC review, the staff concluded that the test program used by GE for verifying the hydraulic performance of the prototype strainer and validating GE's head loss correlation is acceptable, however the staff still had concerns regarding the validity and use of this correlation. GE adopted an empirical means for correlating the fiber/sludge debris bed head loss test data. Because GE chose to correlate head loss in terms of superficial parameters (such as circumscribed velocity) that are easy to determine in plant applications, concerns were identified regarding the generic applicability of the GE correlation, especially application beyond the test range. The GE head loss correlation was based on test data generated over a narrow range of test parameters. The GE correlation does not account for the geometric effects systematically. For example, in none of the GE tests involving sludge and fiber combinations was debris loading sufficient to fill the gaps. Therefore, in all those tests, head loss actually was induced by low-velocity flow through the debris bed confined within the gaps. The controlling parameter then is the flow velocity in the gap near the plate. Instead, the correlation relates the head loss simply to a nonphysical 'circumscribed' velocity. Further, the staff was concerned about the use of the GE correlation for plants where the debris bed would consist mostly of Min-K insulation debris, such as Susquehanna. It was not clear how GE intended to account for the Min-K effect on head loss.

GE responded that they intend to only apply the correlation within the narrow range of parameters for which test data were obtained. However, the staff was still concerned that several plant applications lay outside the range over which the GE prototype strainer was tested. In particular, the staff believed that the application of the GE test data (or the correlation) would be inappropriate without additional testing for the Susquehanna plant (a plant with a sludge-to-fiber mass ratio in excess of those tested). GE conducted an additional test to address this concern. Upon further review, the staff believes the GE introduced sufficient margin to compensate for any deficiencies in the correlation.

The staff concluded that extending the test results over a narrow parametric range outside the test range is reasonable. Further, the staff concluded that the use of GE's hydraulics design method is acceptable for all the BWR plants, with the exception of the Susquehanna plant. For this plant, the staff identified the following specific concerns relative to the use of the GE correlation. First, neither the GE nor the NUREG/CR-6224 correlations were ever tested to the sludge-to-fiber ratios approaching the value for this plant (i.e., thin-bed effects) and second, the controlling insulation in this case may be a different type of

## **NRC Review of Industry and International Sponsored Research**

fibrous insulation for which no head loss data had previously been obtained. Therefore, the GE's approach of validating its hydraulics methodology using head loss data from that additional test is the most prudent approach.

GE proposed to use the BWROG URG methods for estimating head loss across RMI beds. The staff comments regarding these methods were documented in their review of the URG (see Section 4.4). GE's approach to estimate the head loss contribution from RMI debris appears reasonable; however, the staff notes that GE should ensure that the NRC comments provided in Appendix K to the staff's safety evaluation report on the URG [NRC-SER-URG] are properly reflected in any GE plant-specific analyses. Specifically, GE should not neglect the potential contribution of RMI debris to strainer head loss without supporting analyses establishing that RMI contribution is negligible. The staff was unable to verify the contribution to strainer head loss from RMI debris because GE did not provide information relative to the assumed RMI loadings for any of the plants using GE strainers.

GE developed a simple fluid-velocity based head loss correlation for a clean-strainer. Although the staff believes that this correlation can predict clean-strainer head loss to within about 0.5 ft-water, the staff was concerned that the correlation could be slightly non-conservative for some plants. This concern was due to the fact that the correlation was developed using data obtained for a single prototype strainer and may not adequately account for all-important geometric effects. Therefore, the staff recommended that GE apply this correlation carefully, if possible after benchmarking it with data from another strainer with a different geometry. Another alternative would be for GE to ensure that sufficient margin exists in the overall analysis to account for this uncertainty.

The usage of bump-up factors is reasonable as stated in the URG SER. The staff finds that use of bump-up factors yields conservative predictions. As of this date, the hydrodynamic loads portion of the GE methodology is still under review.

### Documentation

The GE methodology is documented in the GE's Licensing Topical Report (LTP) [NEDC-32721P], "Application Methodology for GE Stacked-Disk ECCS Suction Strainer," dated December 23, 1998 (Proprietary). The NRC's review of the GE methodology for determining the head loss across GE stacked-disk strainers is documented in a LANL Technical Evaluation Report (TER) entitled, "Technical Review of GE LTR NEDC-32721P: Application Methodology for GE Stacked-Disk ECCS Suction Strainer," dated December 23, 1998 (Proprietary). The NRC's review of the BWROG URG is documented in the NRC safety evaluation report, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to NRC Bulletin 96-03 Boiling Water Reactor Owners Group Topical Report NEDO-32686, "Utility Resolution Guidance for ECCS Suction Strainer Blockage," August 20, 1998 [NRC-SER-URG].

### **3.1.4 PCI Stacked Disk Strainer Testing**

Performance Contracting Inc. (PCI) also supplied advanced passive stacked-disk strainers to the nuclear industry that was designed to alleviate the strainer blockage problem. PCI developed and tested two prototype stacked-disk strainers. The PCI strainer concept, referred to commercially under the trademark Sure-Flow strainer, consists of a stack of coaxial, perforated metal plate disks that are welded to a common perforated internal core tube. The design maximizes the surface area of the perforated plate while keeping the circumscribed area to a minimum.

# **NRC Review of Industry and International Sponsored Research**

## PCI Program

PCI fabricated and tested several prototypes over a period of nine months to evaluate the head loss performance of the Sure-Flow strainers. The hydraulic performance testing was conducted at the EPRI NDE Center. One prototype, referred to as Stacked-Disk #1 in the URG, was a 40%-scale prototype with six disks, five troughs, between the disks, a 13-inch core tube, a 30-inch outside diameter, and was a 2.5-ft long. A larger prototype, referred to as Stacked-Disk #2, was a 4-ft long strainer with a core tube diameter of 26-inches and a stack outer diameter of 40-inches. Both the BWROG and PCI tested the head loss performance of these strainers. An engineering correlation of the test data was proposed by PCI but with several limitations.

The Sure-Flow strainer is not a standardized strainer i.e., one size fits all. Instead, the concept promoted by PCI is to use similarly designed strainer modules of various sizes and quantities as necessary for each plant. The overall approach is that the individual plant would first determine the anticipated debris loading and the strainer design criteria applicable to that plant. PCI and its associated contractors would determine the size and number of stacked-disk modules necessary to meet the design criteria. For this approach to be successful, the PCI team needed a model that accurately predicted the head loss performance of a generic PCI Sure-Flow strainer. PCI team member, the Innovative Technology Solutions (ITS) Corporation, adapted a generic head loss model used in the NUREG/CR-6224 study and extended it to the stacked-disk strainer geometry. ITS developed a proprietary computer code named HLOSS to automate the head loss calculations performed for each plant. The overall technical approach for using the NUREG/CR-6224 correlation to predict PCI Sure-Flow strainer performance was validated by comparing the correlation predictions with the head loss data.

## NRC Review of the PCI Strainer Program

Because the PCI test data and the ITS head loss models were used by many licensees, the NRC's contractor, LANL performed an in-depth review of the PCI head loss data and evaluated the adequacy of the head loss models. The results of this review are summarized in LANL TER LA-UR-00-5159, entitled "Technical Review of Selected Reports on Performance Contracting, Inc. Sure-Flow Strainer™ Test Data," dated April 27, 2000.

Head loss data were obtained for the two prototype PCI strainers described above. These were obtained for NUKON™ fibrous debris, with and without sludge, and for RMI debris. The dean strainer head losses were measured to estimate frictional losses resulting from the structure of the strainer itself. The clean-strainer head losses for the PCI stacked-disk strainers were about the same as would be expected for a typical truncated cone strainer. PCI developed an empirical correlation for the clean-strainer head loss that the LANL found to perform well.

LANL's review of the fibrous debris data revealed:

- The particulate filtration efficiency of the fibrous debris bed was relatively high. With the exception of one test, the efficiency ranged from 75% to 97% for the PCI prototype #2 strainer. The exception was for a test with a relatively thin layer of fibrous debris; its efficiency was 40%. However, the use of these higher efficiencies must consider the fact that the tests were conducted in a closed-loop system, i.e., the sludge was recycled several times. Eventually the rate of particle capture will equilibrate with the rate at which captured particles escape the bed. In a once through system, the capture efficiency could be substantially reduced.

## **NRC Review of Industry and International Sponsored Research**

- In selected experiments, PCI measured the actual debris volume on the strainer to determine the compressibility of the fibrous debris (i.e., the volume of the fibrous debris on the strainer as it is subjected to compression forces divided by the volume of the debris without the compression forces, often referred to as the theoretical volume). The NUREG/CR-6224 suggested compression equation was found to perform well for NUKON™ debris deposited on the stacked-disk strainers.

PCI developed a purely empirical equation to predict the head loss performance of the PCI strainer loaded with fibrous and particulate debris. PCI acknowledged that the correlation validity could not be assured because the correlation does not relate head loss to fundamental strainer properties. LANL agreed with PCI observations regarding the validity of the correlation.

Selected PCI tests evaluated the impact of adding RMI debris to a fibrous/sludge debris bed. Comparing two tests where the test parameters were essentially identical with the exception of the addition of RMI debris in one of the two tests, clearly demonstrated that the addition of the RMI increased the head loss significantly for higher flow rates (e.g. greater than 7500 GPM). Therefore, strainer head loss analyses should consider the contribution to head loss made by the RMI in mixed fiber/RMI debris beds.

### Documentation

The PCI head loss data is documented in the PCI report "Summary Report on Performance of Performance Contracting, Inc.'s Sure-Flow™ Suction Strainer with Various Mixes of Simulate Post-LOCA Debris," dated September 1997 [PCI-97]. The results of this review are summarized in LANL TER LA-UR-00-5159, entitled "Technical Review of Selected Reports on Performance Contracting, Inc. Sure-Flow Strainer™ Test Data," dated April 27, 2000.

### **3.1.5 NRC Adaptation of the NUREG/CR-6224 Correlation to PCI Stacked-Disk Strainers**

At the staff's request, LANL explored the possibility of adapting the NUREG/CR-6224 compressible fiber/sludge bed head loss correlation to stacked-disk strainers. Note that this correlation was developed for strainers where the approach velocity was constant over the entire strainer area; and therefore, debris deposition on the strainer is relatively uniform. The correlation would perform best on a flat plate or a truncated cone strainer. The purpose of this exploration was:

- To provide an independent tool that can be used by the staff to evaluate the performance of strainers installed at various operating BWR plants.
- Because the basic NUREG/CR-6224 correlation was previously validated over a wide range of operating parameters (debris loads, sludge to fiber mass ratios, etc.), the staff needed the adapted correlation to predict a strainer performance for a parameter range beyond which the strainer was originally tested.
- The adaptation analysis provided additional assurance that the proposed ITS-method of correlating PCI strainer head loss data was adequate.

A NUREG/CR-6224 correlation was found easily adaptable to predicting head losses for more complex shapes, such as the GE and PCI stacked-disk strainers. Two areas have generally been used to describe these strainers: the total perforated plate area and the strainer projected area (referred to as the circumscribed area). Debris deposition on the more complex strainers starts as a uniform deposition on the entire screen area but eventually debris shifts to fill the inner screen regions creating substantially

## **NRC Review of Industry and International Sponsored Research**

non-uniform approach velocities and debris deposition. Once the inner spaces are filled, approach velocities and deposition again approach uniformity.

The NUREG/CR-6224 correlation is appropriate to calculate head loss with small quantities of debris on the strainer, and with large quantities of debris on the strainer such that the gap volumes are filled and the debris layer begins to encompass the strainer circumference. The correlation has been shown to be unreliable for debris loading in between the two extremes. With small quantities of debris on the strainer, the entire strainer screen area would be used. With the large quantities of debris, the circumscribed area would be appropriate. Thus, the effective strainer deposition area changes with the volume of debris deposited on its surface from the entire screen area to the circumscribed area. The controlling geometric parameters are the plate surface area and the gap volume. This concept is illustrated in Figure 3-2.

The ITS-method essentially determined the head loss for the thin layer fibrous debris deposition using NUREG/CR-6224 correlation and again for the circumscribed deposition, and then applies an interpolation scheme to approximate the head loss for debris depositions between the two extreme cases of light and heavy loadings. The NRC review compared the ITS-method prediction to the PCI head loss data and that comparison suggested the ITS-method (PCI approach) is probably accurate, assuming their model was appropriately implemented into the HLOSS code.

LANL estimated the effective strainer deposition areas for the PCI tests by solving the NUREG/CR-6224 head loss correlation in reverse (i.e., the head loss was an input and the strainer area was the output. This was accomplished using the BLOCKAGE code. It was determined that the effective area could be correlated to the volume of debris deposition onto the strainer, as shown in Figure 3-3. Therefore, it was determined that the NUREG/CR-6224 head loss correlation could be modified to simulate debris deposition on a stacked-disk strainer if sufficient test data were available to derive a particular strainer's effective area curve. Once this area data is available, the analysis determines debris loading, the effective area for that loading, and then the head loss. The BLOCKAGE code could potentially be modified with a variable area input capability that is a function of debris volume so that complex strainers could be modeled through the full range of time-dependent debris deposition.

### **Documentation**

This evaluation is summarized in LANL TER LA-UR-00-5159, entitled "Technical Review of Selected Reports on Performance Contracting, Inc. Sure-Flow Strainer™ Test Data," dated April 27, 2000.

#### **3.1.6 Mark III Quarter-Scale Testing**

The Mark III Grand Gulf Nuclear Station (GGNS) conducted extensive quarter-scale pool-transport and head-loss testing for their replacement strainer design and small-scale testing for a segment of the design. The NRC audited the Grand Gulf strainer clogging issue resolution in August 1999. Grand Gulf uses predominantly Mirror™-brand RMI cassettes to insulate reactor system piping but substantial inventories of Kaowool, calcium-silicate, and fiberglass insulations are also present in the containment. RMI was not considered in their debris-generation, debris-transport, or head-loss calculations because RMI debris was observed to not accumulate or remain attached to the strainer under design approach velocities (approximately 0.02 ft/s). Therefore, the primary concern was estimating the combined effects of fibrous debris (Kaowool and fiberglass) and particulate debris (calcium silicate). Grand Gulf replaced its existing truncated cone strainers that had a net surface area of 170 ft<sup>2</sup> with large-capacity passive strainers having a combined area of 6253 ft<sup>2</sup> (~37 fold increase). The replacement strainers, designed by Enercon Services, Inc., are combined into a large single strainer that circumscribes the suppression pool near the floor, as shown in Figure 3-4. This strainer serves as a common header for all six ECCS pumps so that

# NRC Review of Industry and International Sponsored Research

any combination of operating systems can draw recirculation water through the same large screen area. The NRC staff evaluated the application of quarter-scale testing to the GGNS plant analysis.

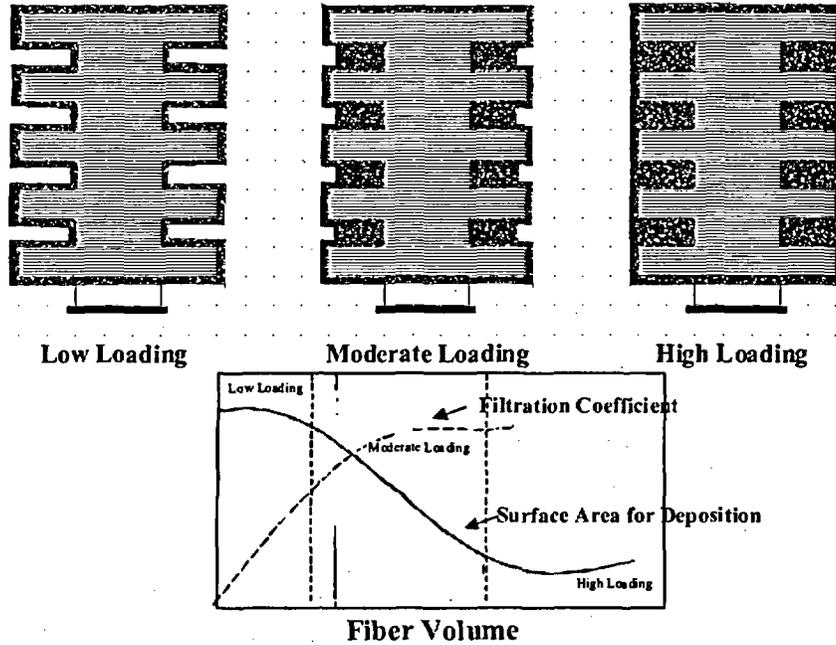


Figure 3-2. Schematic Illustration of Debris Bed Buildup on Stacked-Disk Strainers

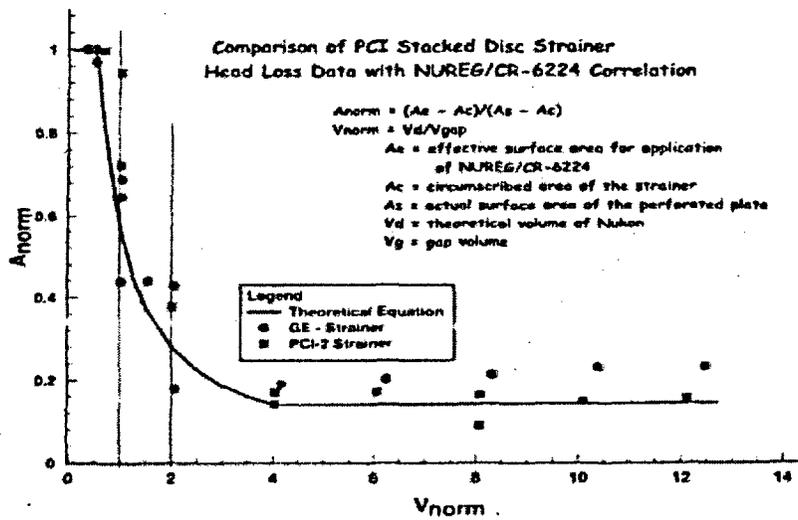


Figure 3-3. Strainer Effective Surface Area Correlated with Volume of Deposited Debris

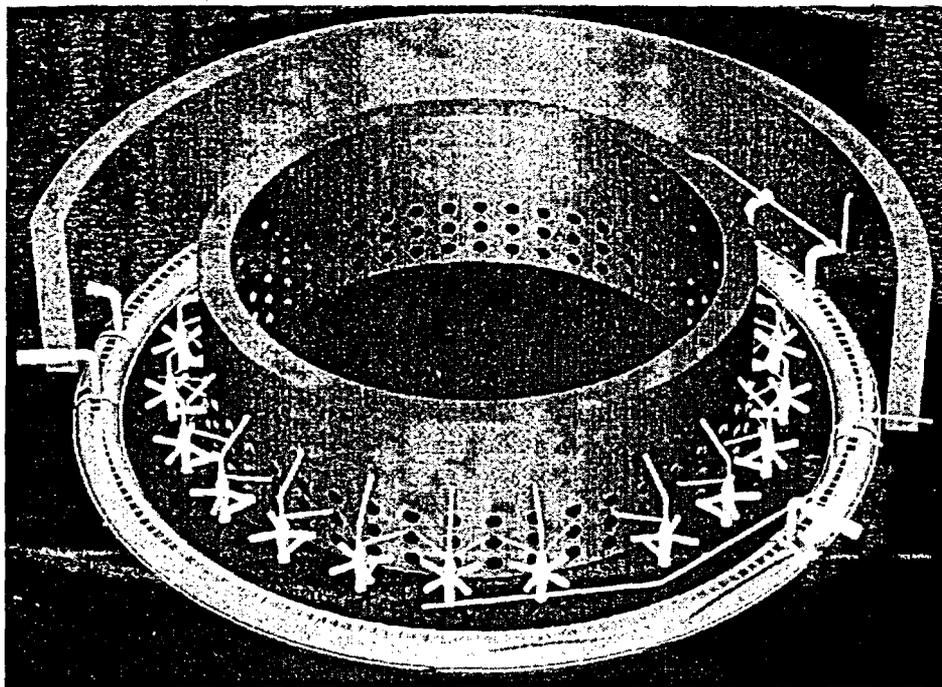
## **NRC Review of Industry and International Sponsored Research**

### Grand Gulf Quarter-Scale Test Program

GGNS sponsored a research program to study head loss performance of their replacement strainer. A quarter-scale strainer was built and installed in the Mark-III quarter-scale test facility. Geometric, operational, and debris loading parameters were all scaled to the GGNS plant values. The flow velocity and debris bed thickness were monitored in the tests to ensure that the measured head loss caused by the debris buildup could be used directly in the plant NPSH analysis.

### NRC Review of Grand Gulf Quarter-Scale Test Program

The staff compared the scaled test parameters to those of the plant and determined that the quarter-scale testing adequately simulated important flow parameters. In particular, the licensee ensured that 1) the approach velocity at the strainer surface was the same as the approach velocity in the plant, and 2) the debris loadings per unit area of the strainer in the tests were the same or greater than those expected in the real plant. There are two geometrical differences between the quarter-scale test setup and the plant: 1) the quarter-scale tests used a significantly lower number of strainer sections compared to the plant, and 2) the construction of these strainer segments was different with respect to specifics such as the number of ribs and the plate thickness. These differences mean that clean-strainer head losses measured in the quarter-scale test setup were not directly scalable to the GGNS plant application. However, the licensee performed detailed analyses to correct for these differences.



**Figure 3-4. Annular Arrangement of Grand Gulf ECCS Strainer in Mark III Containment**

All of the tests were conducted at 75°F whereas the suppression pool temperatures were expected to reach approximately 185°F. The licensee used the results directly in their NPSH margin evaluation; however, this was conservative because using the lower test temperature results in higher head loss due to viscous effects. The clean-strainer head loss for the quarter-scale geometry was about 3-inches of water at the conditions representing runout ECCS flow.

## **NRC Review of Industry and International Sponsored Research**

The licensee sponsored five tests directly applicable to GGNS. The staff drew the following conclusions regarding the GGNS quarter-scale testing program and its results:

- The licensee test program was extensive with great attention to detail.
- The data repeatability was acceptable. Head loss variations of 2-ft-water or less were measured for repeatability tests and the plant has sufficient margin to account for these uncertainties.
- The head loss tests indicate that some of the tests might not have reached steady state before termination. The licensee accounted for this apparent shortcoming by extrapolating to a steady value.
- Cal-Sil and Kaowool combinations resulted in high head losses, even though the approach velocity was relatively slow (0.016 ft/s). This finding is significant, because such data was previously not available. It should also be noted that the licensee continued selected testing after the staff completed their review to better understand head loss implications of calcium silicate insulation debris.

### Documentation

A review of the Grand Gulf strainer testing is found in a LANL TER, titled "On-Site Audit of the Grand Gulf Nuclear Station Emergency Core Cooling System Strainer-Blockage Resolution," dated January 3, 2000 [LA-CP-00-18].

### **3.1.7 LaSalle Tests**

In 1998, Commonwealth Edison Company sponsored a series of plant-specific tests to study head loss resulting from 1.5-mil Aluminum RMI and NUKON™ fiberglass insulation. These experiments supported the strainer replacement for the LaSalle County Station plant. These experiments were conducted using the same test facility used by the BWROG (see Section 3.1.2). The strainer tested was a stacked-disk strainer with a total screen area of 48.6 ft<sup>2</sup>. The NRC reviewed tested documented in the test report TPP-VL0400-006 entitled: "Test Evaluation Report for Test TPP-VL0400-005: LaSalle Strainer Fiber and RMI Debris Tests," dated June 6, 1998 [LaSalle-98].

Six tests were conducted, in which flow rates varied between 2000 and 5000 GPM and RMI debris loading reached as high as 2250 ft<sup>2</sup> of foil. In all the tests, the RMI fragments used were crumpled pieces with the dominant length scale less than 2-inches, therefore very compact beds would be expected. The measured head loss was tabulated as a function of the flow rate through the strainer and the quantity of insulation added to the pool. The LaSalle test report contained references to visual observations regarding the fraction of the debris that actually reached the strainer in each test. It also provided pictorial evidence of debris bed buildup on the strainer, both for RMI, and mixed beds.

Test 1 simulated pure fiber debris buildup on the strainer. Based on analysis of the test conditions, it was found that all the fiber volume could easily be accommodated in the strainer disk cavities, where it would be subjected to low water velocities. The pictorial evidence confirmed this finding. As a result, calculated head losses were small and compared well with the measured head loss of 1.5 ft-water at 4000 GPM. The NUREG/CR-6224 correlation predicted the Test 1 head losses to within 20%.

## **NRC Review of Industry and International Sponsored Research**

Tests 2 and 4 examined pure RMI debris buildup on the strainer surface. In Test 2, RMI debris (2250 ft<sup>2</sup>) was added incrementally over a long duration (test lasted 27,000 seconds). In Tests 4, all the RMI debris was added instantaneously and then allowed to accumulate on the strainer. From the head loss traces, it appears that accumulation occurred over a period of 10,000 seconds, with head loss reaching the steady state value at the end. In both these tests, a total of 2250 ft<sup>2</sup> of RMI foil were added to the pool and allowed to accumulate on the strainer. Head loss predictions obtained using NRC RMI head loss correlation compared well with the test data from Tests 2 and 4. The correlation predictions were within  $\pm 30\%$  of the test data. The licensee did not believe that the variability between Tests 2 and 4 is a result of 'randomness' associated with debris buildup. Instead, the licensee postulated that the difference is due to the fact that insulation was added incrementally over a much longer period of time in Test 2 (27000 seconds). It was reasoned that slow addition allows for gradual building of the debris bed resulting in formation of more compact beds. The licensee however stated that Test 2 is not prototypical of postulated accident conditions in LaSalle plant, and hence should not be used in assessing their strainer performance. Nevertheless, they forwarded the data purely for the insights it has provided them. Licensee's interpretation of data is new and has not been observed previously in any of the investigations that used 'prototypical debris'. It is not to say that licensee's interpretation is wrong, but simply that it could not be independently confirmed. Nevertheless, this analysis suggests that when applied consistently NRC RMI correlation does a reasonable job at predicting such data.

Tests 5 and 6 examined mixed bed buildup on the strainer. In Test 5, a total of 2250 ft<sup>2</sup> of RMI and a total of 9 lbs of fiber were added to the pool. At the end of the test (approximately 10000 seconds), the licensee noted that approximately 75% of the insulation accumulated on the strainer and the remaining insulation settled on the floor. The measured head loss was about 5 ft-water corresponding to a strainer flow rate of 2000 GPM. Test 6 is a repeat of Test 5. Pictorial evidence of mixed debris bed buildup on the strainer suggested that fiber and RMI debris buildup rather uniformly through out the volume of the debris bed, and furthermore that the debris bed far extends outside the circumscribed surface area of the strainer.

For estimating head loss using NRC RMI correlation, the thickness of the debris layer must be estimated and a shape for the debris layer buildup must be assumed to estimate the bed thickness. The actual bed resembles a distorted sphere, which confirms BWROG observation. Head losses caused for such a shape is difficult to predict, without undertaking a complex flow analysis. Instead, the head loss estimates can be bounded by assuming that all the debris bed builds-up over the circumscribed surface area, as defined by the BWROG. Another option is to assume that bed builds up uniformly over the entire circumscribed surfaces, including both ends of the strainer. Reality is somewhere in between these two extremes. Estimates for head losses were obtained by simply adding the RMI induced head loss to fiber induced head loss; i.e., by treating the individual contributions as additives. A treatment that was consistent with Appendix-K guidance.

### Documentation

The LaSalle tests are documented in the test report TPP-VL0400 -006 entitled: "Test Evaluation Report for Test TPP-VL0400-005: LaSalle Strainer Fiber and RMI Debris Tests," dated June 6, 1998 [LaSalle-98].

## **3.2 NRC Compilations and Analysis of International Test Data**

### **3.2.1 Finnish RMI Testing**

RMI is used in a large number of BWRs in the USA. In the event of a LOCA at a plant using RMI for insulation, it is anticipated that some fraction of damaged RMI would be transported to the suppression

## **NRC Review of Industry and International Sponsored Research**

pool and then potentially transported to the ECCS suction strainers. Sateilyturvakeskus (STUK), the Finnish centre for radiation and nuclear safety conducted tests to probe the transport and clogging properties of RMI [STUK-YTO-TR-73] to provide data for evaluation of their influence on ECCS and containment spray systems of the Finnish BWRs in the event of a design basis accident. These tests clearly demonstrated that RMI can be transported to ECCS strainers and cause increased head loss.

Tests were conducted to investigate transport properties of the foil pieces, starting from sedimentation in a stagnant pool of water and proceeding to transport in horizontally and vertically circulating flows. The sedimentation velocities were found to be rather moderate, 0.04 to 0.08 m/s for the stable descent mode of flat pieces. In the vertical circulation tests, all tested pieces were found to become waterborne as the upward vertical velocity exceeds the sedimentation velocity of a piece.

The basic test facility consisted of a water tank (25 m<sup>3</sup>) and a water recirculating system. In the strainer clogging tests, a strainer model was installed on the recirculating system pump suction piping inside the tank. The model represented 1/3 of the width and 2/5 of the height of the actual sump screen and had a total perforated area of 4.55 m<sup>2</sup> (parts of the area were blanked off for certain tests).

The clogging tests addressed the differential pressures obtained due to an accumulation of both pure metallic and a mixture of metallic and fibrous (mineral wool) debris. For purely metallic insulation, it was found that the strainer pressure drop approximately varied proportional to the square of the strainer approach velocity. The strainer pressure drops were dependent upon the size of the debris; the pressure drops were more moderate for small pieces. There were indications of strong interactions between various sizes of pieces. The results were also sensitive to the type of the foil used; dimpled foils seemed to produce smaller pressure drops. A mixture of fibrous debris and metallic foil pieces reacted more aggressively than either of the constituents would alone.

A key element of estimating the impact of RMI on loss of ECCS is adequate data regarding the size distribution and general shapes of RMI fragments caused by a DEGB. The specific metallic insulation tested was DARMET provided by Darchem Engineering Limited, England. DARMET minimizes the heat losses by creating air pockets between the alternate layers of coarse and finely dimpled foil. These inner foils are encased in an outer casing made 0.7 mm thick stainless steel. The inner foils are typically made of 0.06 mm thick stainless steel. By comparison, there are two RMI designs predominate in the United States. Transco products Inc and Diamond Power Specialty Company (MIRROR system) manufacture these insulations. While a small minority of U.S. plants has other RMI systems, no domestic nuclear power plants have installed DARMET. The typical Transco system has 0.051 mm thick inner foils encased in 0.6 mm stainless steel. In the Transco design, a single waffle, or 'crumpled' design is used. The MIRROR RMI system consists of an inner and outer casing made of stainless steel that are 0.38 and 0.94 mm thick, respectively. The inner stainless steel foils are 0.0635 mm thick. Note that number of foils per unit thickness varies from application to application. Also note that the primary difference between DARMET foils and those used in U.S. plants is their method of introducing air pockets (i.e., dimpled foils versus crumpled foils).

The Finnish tests used a wide range of sizes and shapes of foil pieces that were generally flat dimpled pieces, not crumpled. Debris tested in the U.S. tests (see Sections 2.1.2 and 2.1.3) was crumpled in nature as shown in Figure 2-16. MIRROR RMI debris was created using a saturated steam jet for use in U. S. tests (see Section 2.1.1). In the Finnish head loss tests, the RMI pieces were typically cut into strips from the DARMET inner foils and laid on top of a support net in the test section in the desired geometry or placed stamp-like on the strainer plate. In other words, the bed geometry was controlled. For comparison, in the U.S. tests, the debris accumulates on the test strainer in a random like manner.

## **NRC Review of Industry and International Sponsored Research**

There has been some controversy about the magnitude of flow resistance that RMI debris can cause on ECCS strainer surfaces following a LOCA [OECD/NEA/CSNI PWG-1]. The RMI head loss tests conducted in the U. S. generally produced lower head losses than did the Finnish RMI tests. The differences in head loss data have been attributed primarily to the differences in the characteristics of the RMI debris utilized for testing and the method of debris accumulation on the strainer. In the case of the Finnish tests, the debris consisted of strips of dimpled DARMET placed on the strainer in a predetermined geometry, whereas in the U. S. tests, 'crumpled' debris was randomly drawn onto the strainer by the water flow. These differences impacted the physical mechanisms that induced the flow resistance. This controversy is discussed in more detail in Section 5.2.2.

### Documentation

The information presented here was summarized from the following two technical reports: 1) STUK-YTO-TR-73, entitled "Metallic Insulation Transport and Strainer Clogging Tests," dated July 1994 and 2) MRI-1194-TRR1, entitled "Comparison of Test Results on Metallic Reflective Insulation as performed by the Finnish Centre for Radiation and Nuclear Safety (STUK) and the Materials and Configurations used in Boiling Water Reactor Plants in the United States," dated November 30, 1994.

### **3.4.2 Vattenfall Mineral Wool Testing**

Following the Barsebäck strainer blockage event, a design review of the Ringhals recirculation function was made in 1993 [IWG]. Ringhals 2 is a 3-loop Westinghouse PWR in operation since 1974. This review concluded that the recirculation function in Ringhals needed improvements. The main reason was that a tank test in Alvkärlby Laboratory showed that the earlier design basis for debris settlement was not correct. The tests showed that recirculating water falling via floors would not only prevent settling of fibers, but also cause larger pieces of insulation material to be broken down into smaller fibers and fines. CFD calculations and model testing of the reactor containment pool flows were made. New sump screens with a total area of 190 m<sup>2</sup> were developed. Part of the sump screen was designed to make cleaning possible. Alvkärlby Laboratory also performed testing of the sump screen design to determine the capacity for various kinds of debris, self-cleaning qualities and function of the sump screen differential pressure measurement system. The new screens were installed in Ringhals 2 in 1995. Pump suction was originally taken from two cage type sump screens each having an area of 7 m<sup>2</sup> that were designed in conformance with RG 1.82, Rev. 0 published in June 1974.

Vattenfall and the insulation supplier performed insulation tests. The Ringhals 2 containment contains the following types of insulation: RMI, fiberglass, mineral wool, polyurethane, and reinforced cement (Linpac). The Vattenfall tests showed that nuclear grade fiber insulation without jacketing could be fragmented at a distance of 35 pipe diameters from a pipe break. The new sump screen design was based on a total of 45 m<sup>2</sup> of fiberglass insulation debris and 12 m<sup>2</sup> of mineral wool debris. In addition, RMI debris as well as other debris was considered. The design was based on the empirical experience that 2/3 of the insulation would reach the pool and no sedimentation would occur due to the stirring effect of the recirculation water falling into the pool. To compensate for uncertainties, a small part of the strainers were designed with self-cleaning capabilities; achieved without backflushing or moving parts. Based on test data, neither vortices nor air ingestion would be created at rated flow conditions. The strainers were equipped with head loss measurement capability including a control room alarm.

Extensive testing was conducted. Tests were conducted to verify the behavior of fiber and RMI insulation material subjected to jets and their transport behavior in the containment pool. Testing was conducted to verify the behavior of the sump screens. Sump screen head loss tests were conducted for steam-fragmented fiber and RMI insulation materials, as well as, for recirculation water fragmented fiber

## **NRC Review of Industry and International Sponsored Research**

insulation. Head loss tests were also conducted for combinations of fibers and impurities such as lubrication oil and carbon using PWR chemistry water.

### Documentation

The information presented here was summarized from the International Working Group (IWG) on Sump Screen Clogging technical report, entitled "Modification of Sump Screens in Ringhals 2," dated May 10-11, 1999.

### **3.3 References**

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## **NRC Review of Industry and International Sponsored Research**

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EC-059-1006, Rev. 0, K. W. Brinkman and P. W. Brady, "Results of Hydraulic Tests on ECCS Strainer Blockage and Material Transport in a BWR Suppression Pool," Pennsylvania Power and Light Company, May 1994.

# Resolution Methodology

## 4.0 RESOLUTION METHODOLOGY

The NRC issued NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," on May 6, 1996. All BWR licensees were requested to implement appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA. The staff had identified three potential resolution options but allowed licensees to propose others that provided an equivalent level of assurance. The three options identified by the staff were: 1) to install a large capacity passive strainer, designed with sufficient capacity to ensure that debris loadings equivalent to a scenario calculated in accordance with Section C.2.2 of RG 1.82, Revision 2 do not cause a loss of NPSH for the ECCS, 2) install a self-cleaning strainer that automatically prevents strainer clogging by providing continuous cleaning of the strainer surface with a scraper blade or brush, and 3) install a backflush system that relies on operator action to remove debris from the surface of the strainer to prevent it from clogging. All licensees were requested to implement these actions by the end of the first refueling outage starting after January 1, 1997.

The bulletin noted that plant-specific analyses to resolve this issue are difficult to perform because a substantial number of uncertainties are involved. Examples of these uncertainties include the amount of debris that would be generated by a pipe break for various insulation types; the amount of debris that would be transported to the suppression pool; the characteristics of debris reaching the suppression pool (e.g., size and shape); and head-loss correlations for various insulation types combined with suppression pool corrosion products, paint chips, dirt, and other particulates. Many of these uncertainties would be plant-specific because of the differences in plant characteristics such as plant layout, insulation types, ECCS flow rates, containment types, plant cleanliness, and NPSH margin. As discussed earlier in this report, testing was conducted to quantify many of these uncertainties.

The bulletin further noted that the staff closely followed the work of the BWROG to resolve this issue and demonstrate compliance with 10 CFR 50.46 and Regulatory Guide 1.82, Revision 2. The BWROG had evaluated several potential solutions and completed testing on three new strainer designs: two passive strainer designs and one self-cleaning design. The BWROG effort was consistent with the options proposed in NRCB 96-03 for resolution of the ECCS potential strainer clogging issue. The BWROG then developed the URG [NEDO-32686-A] to provide utilities with: 1) guidance on the evaluation of the ECCS potential strainer clogging issue for their plant, 2) a standard industry approach to resolution of the issue that is technically sound, and 3) guidance that is consistent with the requested actions in the bulletin for demonstrating compliance with 10 CFR 50.46. The URG includes guidance on a calculational methodology for performing plant specific evaluations.

The NRC reviewed the BWROG URG document and issued the staff's Safety Evaluation Report (SER) on August 20, 1998 [NRC-SER-URG]. The SER should be used in conjunction with the URG to ensure an acceptable and consistent response by the industry to NRC Bulletin 96-03. In the SER, the staff noted that the issue of potential strainer blockage is complex, in that, head loss across suction strainers is not only a function of the amount of debris, but also of the types (e.g., fibrous insulation, paint, reflective metallic insulation, dirt, corrosion products, etc.) and characteristics of the debris (size, shape, etc.). The analyst must evaluate the worst case for potential strainer debris loadings, consider the potential for foreign material to be introduced during normal plant evolutions such as refueling and maintenance outages, and evaluate maintenance practices including the maintenance of qualified coatings in the drywell and wetwell.

The NRC concluded that the URG was a comprehensive document providing: 1) general guidance on resolution options, and 2) detailed guidance on performing plant-specific analyses to estimate potential worst case debris loadings on ECCS suction strainers during a LOCA. For performing a plant-specific analysis, the URG provides methodologies for: 1) estimating the amounts and types of debris that could

## Resolution Methodology

be generated by a LOCA, 2) estimating the amount of the generated debris which could be transported to the suppression pool, 3) estimating the amount of debris that could be entrained on the ECCS suction strainer surfaces, 4) determining the head loss caused by the estimated debris accumulation, and 5) calculating the NPSH margin. In order to provide flexibility to the utilities, the URG provides multiple methods for performing each part of the plant-specific analysis. However, due to incomplete guidance and inadequate supporting documentation or analysis in several areas, the staff was unable to determine if all of the methodologies, or combination of methodologies, were conservative. Similarly, much of the general guidance on "resolution options" also lacked sufficient detail for the staff to review. Since the staff lacked sufficient detail and supporting justification on many of the "resolution options," these were generally considered unacceptable without further supporting justification from a licensee or the BWROG. This section presents highlights of the URG and the findings of the NRC review of the URG.

### 4.1 Evaluation of URG Resolution Options

#### URG Guidance

The BWROG recommended plants replace their existing strainers with one of the alternate designs that have demonstrated better performance characteristics. For plants that have more than a minimal amount of fibrous insulation, the URG recommends that licensees size their strainers as large as possible without violating their penetration hydrodynamic load limits. Licensees should then evaluate the strainer performance with the calculated debris loading to ensure that it provides adequate performance for maintaining the ECCS pump NPSH margin. For plants with almost all reflective metallic insulation (RMI), the URG suggested two methodologies: 1) sizing the strainers based on the head loss when the strainer is loaded at the saturation level with RMI and/or 2) sizing the strainer based on a calculated expected debris loading.

The URG recommended and discussed nine resolution options available to licensees for resolving the strainer clogging issue for their BWR plant. These options were:

1. Refine containment debris source analyses in order to reduce the estimates of debris reaching the strainers, i.e., reduce conservatism in analytical assumptions.
2. Replace the existing strainer with an alternate passive design such as the stacked disk or star strainer designs to increase the debris capture capability of the strainer leading to a lower head loss for a comparable debris loading. Note that this was also the NRC Option 1 in NRCB 96-03.
3. Install insulation blanket jacketing with appropriate attachment mechanisms to inhibit debris generation. The URG noted that BWROG test data showed that metal-jacketed insulation generated less debris than its unjacketed counterpart.
4. Implement an additional foreign material exclusion (FME), housekeeping controls, and/or more frequent suppression pool cleaning to reduce transient debris.
5. Pursue a licensing basis change with the NRC, such as using a more realistic decay heat curve in lieu of the conservative curve used in the original licensing basis to lower predicted suppression pool temperatures following a LOCA to improve the calculated NPSH margin. Note that the BWROG does not recommend crediting containment overpressure in calculating NPSH margins.
6. Re-evaluate ECCS suction line penetration loads without reopening the licensing basis for containment loads. The BWROG does not recommend reopening the licensing basis for containment loads.

## Resolution Methodology

7. Partially replace fibrous insulation with RMI to reduce the potential for generating fibrous debris.
8. Install a backflush system as a defense-in-depth measure. BWROG does not recommend this option as a primary mitigating strategy because it would likely increase operator burden, especially early in the accident.
9. Install self-cleaning strainers, however BWROG notes that licensees would need to resolve significant design, qualification, and surveillance issues before implementation.

### NRC Evaluation

Three of the nine URG options are consistent with the resolution options proposed in NRCB 96-03: the installation of alternate passive design strainers, self-cleaning strainers, or backflush. However, in the opinion of the staff, the remaining six URG options are not "resolution options," because they are insufficient by themselves to resolve this issue for any plant. On the basis of current knowledge of existing plant strainer designs and the deleterious phenomena that can affect head loss across the strainer and NPSH margin, the staff does not believe that any BWR licensee can justify maintaining their existing strainer design for resolution of the strainer clogging issue. Rather, the other six URG resolution options discussed are better characterized as potential licensee actions, which could help licensees reduce the size of the strainer needed to resolve the issue. However, the resolution options lack substantial detail on the technical basis for these options and the specific detail information on how to apply each option. For this reason, a licensee should resolve the staff's concerns for each option in a plant-specific submittal prior to using the option to as a part of their resolution for the strainer clogging issue.

Additional specific concerns/comments of the staff included:

- The staff recommends that licensees use vendor specific data based on the licensee's analyzed conditions as the basis for determining head loss across the strainer.
- The staff was unable to reach any conclusion regarding the acceptability of installing jackets around insulation blankets due to a general lack of definitive guidance to utilities for installing jackets and estimating their associated reduction in debris.
- The staff has concerns regarding specifically incorporating FME or housekeeping programs into a licensee's strainer blockage issue resolution. Given the numerous events reported over the last few years related to FME issues, the industry has not demonstrated that FME controls alone are effective in ensuring that materials are not left in the drywell, wetwell, or suppression pool. As such, the staff believes that regular inspections of the suppression pool and ECCS suction strainers, and cleanings when necessary, should be conducted every refueling outage until licensees have demonstrated over time the ability to control foreign materials. The staff believes it is more prudent to add margin when sizing strainers to account for the uncertainty in the effectiveness of housekeeping controls.
- The staff concurs that additional containment overpressure (other than an amount already approved by the staff for the existing licensing basis) should not be used as part of the resolution of this issue.

## Resolution Methodology

- The staff cautions that licensees making changes to hydrodynamic load calculation coefficients and/or methodologies should not do so without testing to demonstrate the validity of the revised calculations.
- The staff agrees that partially replacing fibrous insulation with RMI to reduce the potential for generating fibrous debris is an appropriate action, however, licensees should reassess breaks to ensure that the changes do not affect which break is the most limiting in term of NPSH margin. In addition, licensees must consider head loss in terms of combined fibrous/RMI debris beds.
- Regarding the backflush option, the staff concurs with the BWROG that backflush is a more viable option as a defense-in-depth measure. The also believes that, if used as a primary means of ensuring adequate ECCS flow, backflushing should be combined with the installation of a large-capacity passive strainer to maximize the time before backflush initiation would be required.
- Regarding self-cleaning strainers, the staff agrees with the BWROG that such a design is less desirable than a passive strainer for resolving the issue and that such a strainer should only be used if a passive strainer solution is not viable.

The staff also noted that a good practice would be to maintain defense-in-depth because of the uncertainties associated with any resolution of this issue. The staff strongly encouraged the enhancement of alternate water sources, operator training, and EOPs to ensure that operators can mitigate any situation involving loss of ECCS flow due to strainer clogging.

### 4.2 Debris Sources

Sources of debris contributing to the potential clogging of an ECCS strainer have been generally categorized into three groups for analyses. These groups are insulation debris generated within the drywell by a LOCA, debris other than insulation that originate from the drywell, and debris that originate in the wetwell.

#### 4.2.1 LOCA Generated Insulation Debris

The URG presented methodologies that the BWROG recommended for calculating the amount of LOCA-generated debris from piping insulation. The guidance provided included guidance for determining the pipe break locations to be analyzed, the zone of influence (ZOI) for the break jet, and the destruction factors for piping insulations typically used in domestic BWRs. In the URG, the destruction factors were combined with drywell transport fractions; therefore destruction factors are discussed in Section 4.3.1.

##### 4.2.1.1 Pipe Break Selection

###### URG Guidance

Postulated pipe breaks in a BWR plant include main steam, recirculation, and feed water line pipes that can be grouped as small, medium, or large breaks. Because it is difficult to analyze each postulated break, a criterion is needed to select the bounding breaks that maximize head loss across the ECCS pump suction strainers. NRC Regulatory Guide 1.82, Rev. 2, states that as a minimum, licensees should consider the following postulated break locations:

## Resolution Methodology

- Breaks on the main steam, feedwater, and recirculation lines with the largest amount of potential debris within the expected ZOI.
- Large breaks with two or more different types of debris within the expected ZOI.
- Breaks in areas with the most direct path between the drywell and wetwell.
- Large and medium breaks with the largest potential particulate debris-to-insulation ratio by weight.

The URG reiterated the RG 1.82, Rev. 2 guidance and included the following additional provisions:

- Plants licensed in accordance with the NRC's Standard Review Plan (SRP) and Branch Technical Position (BTP) MEB 3-1 need not analyze all of the identified break locations. Instead, such plants may evaluate only those breaks that are most likely to occur.
- Other plants may use the guidance from RG 1.82, or other guidance consistent with 10CFR50.46. However, licensees should exercise care to differentiate between pipe break locations used for ECCS evaluation and those that are in the plant's licensing bases.
- Plants employing alternate high-capacity strainer designs need not analyze large and medium breaks with the largest potential debris-to-insulation ratio by weight.

### NRC Evaluation

The staff concluded that:

- Licensees should evaluate a sufficient number of breaks to ensure that the most limiting breaks are analyzed and should include pipe sections or welds in the area of the drywell where the highest density of fibrous insulation is installed.
- RG 1.82, Rev. 2, provides the complete spectrum of breaks that should be analyzed to meet the intent of 10CFR50.46.
- The staff considered SRP Section 3.6.2 and BTP MEB 3-1 inappropriate for demonstrating 10CFR50.46 compliance. SRP Section 3.6.2 does not provide guidance or acceptance criteria for demonstrating compliance with 10CFR50.46. The BWROG did not demonstrate that break locations selected consistent with SRP Section 3.6.2 would bound the worst-case debris generation scenarios.
- Licensees may screen out large breaks with the highest particulate-to-fiber debris ratio by weight and medium LOCAs in performing their plant-specific analyses, if their resolution includes both the following:
  - Installation of a strainer similar to the stack disk prototype number 2, star strainer, or another geometric similar strainer with deep crevices.
  - The licensee has adequate assurance from the strainer vendor that the screened out breaks would be less limiting in terms of head loss across the strainer. The vendor should have adequate test data to support the screening of these breaks.

# Resolution Methodology

## 4.2.1.2 Zone of Influence

### URG Guidance

Postulated breaks in the primary piping would destroy insulation located in the region closely surrounding the separated broken ends due to the combined effects of blast wave and jet impingement. The ZOI over which the destruction occurs strongly depends on the type of insulation and mode of encapsulation in addition to the type of break and the subsequent motion of the broken ends. The BWROG developed the URG guidance using experimental data obtained from Air Jet Impact Testing (AJIT) and the results of the associated computational fluid dynamics (CFD) modeling. The URG provided four options (or methods) for selecting the ZOI over which LOCA jets would damage the insulation. Each method was less conservative relative to the preceding method; conversely, the licensee required more rigorous analysis as the relative conservatism was lessened. The licensee selects the method based on resources balanced against the need to reduce its drywell insulation debris source. These methods are:

1. The ZOI is assumed to encompass the entire drywell, i.e., all insulation located within the drywell is assumed damaged.
2. The ZOI is defined by determining the spatial volume enveloped by a specific damage pressure of interest for a jet expanding in free space and mapping a spherical ZOI of equal volume surrounding the break. This means that the ZOI is defined as the spherical volume for which the break damage pressure exceeds the minimum or onset pressure for material damage. The pressure required to damage insulation material is specific to each material. In this method, the material with the lowest dynamic destruction pressure is used to define the ZOI, i.e., the ZOI is largest for the weakest material. Full separation of both ends of a double-ended guillotine break (DEGB) is assumed resulting in continuous blowdown from both ends.
3. Method 3 is similar Method 2 but with some differences. The licensee is allowed to take credit for pipe restraints and to evaluate axial and radial offsets consistent with those restraints. The licensee is also allowed to take credit for a single-ended blowdown. With this method, the licensee maps different ZOIs for each different insulation material.
4. With this method, CFD modeling in conjunction with AJIT data is used to define the ZOI.

Note that the ZOI depends upon the break selected for analysis. There will be as many ZOIs as there are selected breaks. All of the insulation contained within the ZOI is assumed damaged (but not necessarily transportable). The licensee can either assume that all damaged insulation is transportable to the suppression pool or classify the debris into two bins for subsequent transport analysis. These bins are 1) debris generated above the lowest elevation grating, and 2) debris generated below the lowest elevation grating. Debris size distribution was however not addressed.

### NRC Evaluation

The staff conducted independent analyses to assess if the URG guidance is appropriate and bounding. The staff concluded that:

- Method 1 is clearly bounding and conservative since the entire inventory of drywell insulation was assumed damage.

## Resolution Methodology

- Method 2 would result in a ZOI sufficiently large to envelop the entire destruction zone. Method 2 is sufficiently conservative and, therefore, is considered acceptable for use on insulations with low destruction pressures. However, for insulations with high destruction pressures, the staff recommends that licensees develop the ZOI on the basis of the target-area-averaged pressures instead of the jet-centerline pressures.
- Method 3 is acceptable with the same comments applying to Method 3 as were applied to Method 2.
- Method 4 is unacceptable at the time because the URG lacked any detailed guidance regarding this method. Licensees using this method should address the staff's concerns including the validation of the selected CFD code.

Damage pressures (i.e., the lowest jet-centerline pressure for which damage is expected), were estimated by the BWROG based on AJIT data. Each type of insulation will damage at a different pressure and its damage pressure is further dependent upon the method of installation. The NRC staff performed confirmatory analyses to confirm these damage pressures and to assess their scalability to BWR drywells. These analyses were documented in Appendix B of URG-SER. The NRC confirmatory damage pressures are compared to the corresponding URG pressures in Figure 4-1. Except for a few modest reductions in pressures, the NRC pressures generally agreed well with the URG pressures.

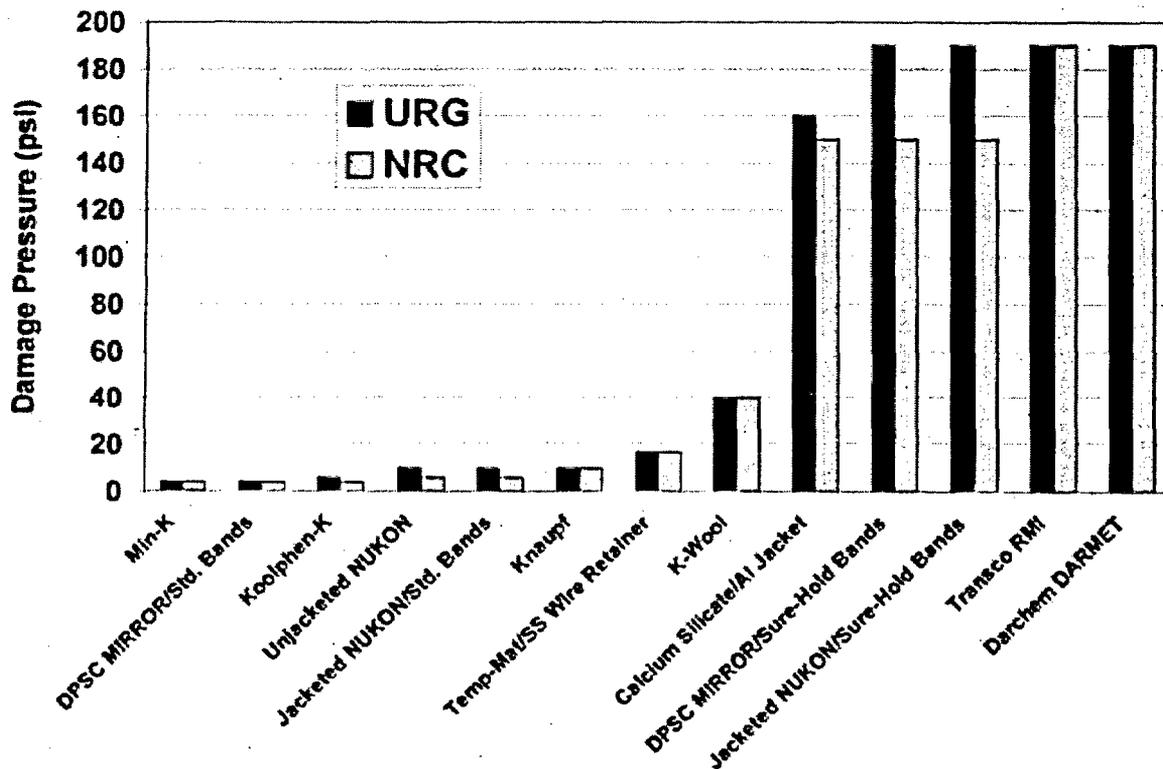


Figure 4-1. Damage (Onset) Pressures for Various Insulations

The staff concluded that the BWROG's basis for using the jet centerline pressure as the insulation's characteristic damage pressure is inadequately supported by analysis or data. The staff's review of the data and independent CFD calculations led to the conclusion that incipience of damage is more accurately

## Resolution Methodology

characterized by the target-area-averaged-pressures or total jet impingement load rather than local maximum pressure. The staff believes that this concern should be addressed on a plant-specific basis.

The staff notes that the URG does not provide guidance regarding the types of analyses that licensees must undertake to determine the extent of axial and radial separations of the broken ends. Licensees taking credit for limited separation of the broken ends of pipes due to pipe restraints or single-ended blowdown should conduct and retain supporting analyses.

### 4.2.2 Drywell Debris Sources Other Than Insulation Debris

The URG categorized other 'non-insulation' type of debris as transient, fixed, or latent debris. The URG defines transient debris as non-permanent plant material brought into the drywell, typically during an outage (e.g., tools, rags, and temporary filters). Fixed debris is part of the plant, and only becomes debris during a LOCA (e.g., paints and coatings delaminated from the coated surface by direct steam impingement from a pipe break). Latent debris would appear after a prolonged exposure to a LOCA environment for instance, an unqualified coating, which is not directly impinged upon by the LOCA break jet, may subsequently fail as a result of prolonged exposure to the temperature, pressure, and radiation of the post-LOCA environment.

#### URG Guidance

The URG provides guidance that licensees can use to identify other sources of debris in the drywell and to estimate the quantities of such debris that should be used in the ECCS strainer analysis. The URG specifically identified the following other sources of debris:

- Dirt/Dust The URG suggests that licensees assume 150 lbm of dust/dirt for estimating the strainer head loss. This estimate was based on engineering judgment.
- Other Transient Debris The URG does not provide a specific value. Individual utilities should use their best judgment.
- Rust from Unpainted Steel Surfaces The URG recommends a value of 50 lbm on the basis of engineering judgment.
- Particulate Debris The URG does not provide a specific value. Individual utilities should use their best judgment.
- Paints/Coatings The URG recommends values of 47 lbm for inorganic zinc coatings, 85 lbm for inorganic zinc top-coated with epoxy, and 71 lbm for 100% epoxy coating. These estimates were predicted by a study conducted by Bechtel Power Corporation.
- Concrete The URG does not provide a specific value. Individual utilities should use their best judgment.
- Unqualified/Indeterminate Paint/Coatings The URG does not provide a specific value. Individual utilities should use their best judgment. As an alternative, the URG notes that licensees may remove the unqualified or indeterminate coatings, or attempt to qualify them through *in situ* qualification. The URG does not provide guidance regarding how licensees should accomplish *in situ* qualification.

## Resolution Methodology

The URG cautions licensees that their FME, housekeeping, and inspection programs must be adequate to ensure that the quantities of each of these types of materials do not exceed the quantities assumed in the plant's evaluation of ECCS strainer loading.

### NRC Evaluation

The staff compared the URG recommended values with estimates previously developed as part of the NRC sponsored reference plant study (see Section 2.2.1) [NUREG/CR-6224]. On the basis of this comparison, the staff found that most of the values suggested in the URG are either about the same or larger than the corresponding reference plant study values. The staff concluded that the generic values provided in the URG for other sources of debris are acceptable, however, the staff noted differences exist between a specific plant and the reference Mark I plant. Due to these differences, the staff believes that some individual licensees may wish to evaluate the applicability of the recommended values for their specific plant. The staff provided some suggestions on estimating the sources of dirt, dust, and rust in the containment, as well as paints/coatings for plants with unqualified or indeterminate coatings. These suggestions by the staff were provided for informational purposes and are not considered a requirement for use.

The staff notes that the sensitivity of the head loss calculations to these numbers may vary with the assumptions and the resolution option selected by each licensee. The significance of these values escalates, for instance, if the licensee attempts to justify their strainer with assumptions that are as "realistic" as possible. On the other hand, when justifying the installation of a large passive strainer, sensitivity analyses could well demonstrate that variations in the quantities of dirt, dust, rust flakes, etc. may not significantly affect the overall head loss across the strainer.

The staff concluded that licensees should be cautioned to carefully evaluate the potential impact of unqualified and indeterminate coatings on ECCS suction strainer head loss. Some licensees may wish to evaluate the applicability of the conclusion of the Bechtel coatings report for their plant. If available, licensees are encouraged to use test data to support their evaluation of coatings. Unless data is available supporting use of other assumptions, the staff suggests that licensees assume that all unqualified and indeterminate coatings are transported to the strainer surface.

### 4.2.3 Suppression Pool Debris

Both transient debris and sludge are potentially present in the suppression pool at any given time. URG guidance was developed, in part, on the basis of an extensive BWROG survey of suppression pools of selected BWR plants in the United States.

### URG Guidance

The BWROG survey [BWROG Letters OG95-388-161 and OG96-321-161] showed that suppression pools would likely contain various types of debris unrelated to a LOCA. This debris could be transported to the ECCS suction strainers and contribute to head loss across the strainer. The URG provided guidance related to identifying various sources of debris and important considerations that should be used to estimate the quantities of such debris. The URG identified the following sources of suppression pool debris:

- Fibrous debris entrained in the suppression pool prior to a LOCA.
- Non-fibrous debris entrained in the suppression pool prior to the LOCA.

## Resolution Methodology

- Dirt/dust above the pool that could wash down into the pool during pool swell.
- Other potential debris, such as operational debris and unqualified/indeterminate coatings.

During its evaluation of the strainer clogging issue, the BWROG conducted a survey to estimate the quantities of sludge (primarily corrosion products from carbon steel piping systems) entrained in the suppression pools. The medium sludge generation rate for the 12 surveyed plants was 88 lbm/year (dry weight). On the basis of this survey, the BWROG recommended a sludge generation rate of 150 lbm/year (dry weight), however, licensees should review available data on their plant specific conditions and make a determination as to whether this suggested rate is conservative for their plant. This sludge generation rate can be coupled with frequency of pool cleaning to estimate the total quantity of sludge for use in the analysis of ECCS strainer blockage. |

The URG does not specify generic estimates for any other types of debris. However, the URG does list the considerations that licensees should address while estimating the quantities of other debris to be used in the analysis of ECCS strainer blockage. The URG cautions licensees to recognize that the operability of the ECCS system may be challenged if the licensee cannot demonstrate that suppression pool debris source terms will be controlled at values less than assumed in the strainer sizing calculations.

### NRC Evaluation

The staff evaluated the adequacy of the BWROG recommended sludge masses and their tractability and the staff finds no deficiencies in the recommendations documented in the URG. The staff concluded that the BWROG interpretation of the survey information and the URG guidance are acceptable but the staff reiterated the importance of the FME program to minimize the quantity of other potential debris.

### **4.3 Transport of Debris**

Debris transport analyses were broken down into drywell and wetwell transport analyses. Drywell transport processes are governed primarily by primary system depressurization flows and subsequent break overflow and containment spray flows. The wetwell transport considers debris transport and settling within the suppression pool.

#### **4.3.1 Drywell Debris Transport**

##### URG Guidance

The BWROG provided guidance regarding various options for estimating the fraction of the damaged insulation generated in the drywell that would be subsequently transported to the suppression pool. The BWROG approach combined debris generation and drywell debris transport into a combined methodology, such that the URG recommend fractions of the damaged insulation within the ZOI that should be considered likely to transport to the suppression pool for each type of insulation.

A number of aspects were considered by the BWROG in determining these recommended fractions. First of all, the debris was categorized into three groups, such that the transport of each group could be considered independently of the other groups. Based on the condition of debris recovered in the AJIT tests, the damaged fibrous insulation was categorized as:

- Fines
- Large Pieces

## Resolution Methodology

- Blankets

The damaged RMI debris was categorized as:

- Small Pieces (<6 in<sup>2</sup>)
- Large Foils (>6 in<sup>2</sup>)
- Intact Assemblies

The fibrous "fines" and the RMI "Small Pieces" were generally considered transportable because they would pass through a typical grating with ease. A continuous grating would stop virtually all of the other debris categories.

For fibrous debris, the "large pieces" and "blankets" were effectively treated in the BWROG analyses as a combined group referred to as "blanket material". In both cases, a grating effectively stopped both from transporting and both were subjected to erosion by break overflow. The insulation within the inner 3 L/D was assumed completely destroyed into transportable debris.

The BWROG used AJIT data to derive the relative fractions of the insulation destroyed into one of three size categories. These fractions depended upon the type of insulation and for some insulation types, depended upon whether the insulation was originally located above or below the lowest elevation grating in the drywell. The BWROG calculated these fractions as integral values averaged over the entire ZOI. These URG fractions are listed in Table 4-1. For example, 77% of the damaged NUKON™ within the ZOI was considered "Blanket Material" and the remaining 23% was "fines."

*Table 4-1. Fractions of Blanket Material with Low Transport Efficiency*

Insulation Material	Fraction of Blanket Material with Low Transport Efficiency
NUKON™	0.77
Temp Mat™	0.84
K-Wool	0.78
Knauf®	0.70
NUKON™ Jacketed with Sure-Hold Bands	0.85
Calcium Silicate with Aluminum Jacketing	0
Koolphen-K®	0.74

The BWROG estimated the transport fractions for each debris category for both fibrous and RMI debris. These fractions are listed in Table 4-2. The BWROG recommended that 100% of the fibrous fines and the RMI small pieces be considered as transported to the suppression pool for Mark I and Mark III plants as a combined result of both blowdown and washdown processes and for both MSL and RL breaks. However, for Mark II plants, the BWROG limited the transport of fibrous fine debris to 50% for MSL breaks and 56% for RL breaks and RMI small debris to 10% for MSL breaks and 5% for RL breaks. These estimates were based on small-scale experimental data and the analysis of the water flow on drywell floors.

For larger debris, either fibrous or RMI, no direct transport to the suppression pool was assumed for debris generated above the lowest grating. For larger pieces of fibrous debris generated below the lowest grating, a fraction of this debris was assumed to directly transport to the suppression pool. For Mark I and Mark III plants, this fraction was estimated at 70% but for Mark II plants, the estimate was reduced to

## Resolution Methodology

30%. Larger pieces of RMI were not assumed to transport to the suppression pool (generated either above or below a grating). The remaining mode of transport, applicable to fibrous debris, was erosion by break overflow. Here, an assumed 25% of blanket-material remaining in the drywell would be located so that it would be plummeted by the break overflow and the 25% of this material would be eroded away and transported to the suppression pool, resulting in 6.25% of blanket-material transporting to the suppression pool. Lacking appropriate data, an erosion fraction of 1.0 was assumed for calcium silicate, Koolphen-K, and Min-K insulations (non-fibrous). The URG did not address breaks that could result in debris being generated both above and below the lowest grating. Further, the URG did not specifically address offset or splits gratings where depressurization flows could partially bypass the gratings.

*Table 4-2. URG Drywell Transport Fractions*

Fibrous Insulation Debris		RMI Debris	
Size Category	Transport Fraction	Size Category	Transport Fraction
Fines	1.0 for Mark I & III  0.5 for Mark II MSLB 0.56 for Mark II RLB	Small Pieces	1.0 for Mark I & III  0.1 for Mark II MSLB 0.05 for Mark II RLB
Blanket Material Above Grating	No Direct Transport 25% Erosion of 25% of Pieces = 6.25%	Large Foils Above Grating	No Transport No Erosion
Blanket Material Below Grating	70% Direct + 6.25% Erosion of Remaining 30% for Mark I & III  30% Direct + 6.25% Erosion of Remaining 70% for Mark II	Large Foils Below Grating	No Transport No Erosion

These debris generation and transport fractions were further developed into combined debris generation and transport factors for each type of insulation. Unjacketed NUKON™ debris generated above the lowest grating for example, 23% of the damaged insulation was turned into fine debris that subsequently transport directly to the suppression pool. Then, 6.25% of the remaining 77% (blanket material) was eroded away and also transported for a total of 28% of the ZOI insulation transported into the suppression pool (i.e.,  $0.23 + 0.0625 \times 0.77 = 0.28$ ). Below the lowest grating, the total debris transported would consist of the 23% fines, 70% of the 77% blanket material, and 6.25% of the non-transport blanket-material that was subsequently eroded (i.e.,  $0.23 + 0.70 \times 0.77 + 0.0625 \times 0.30 \times 0.77 = 0.78$ ). Combined debris generation and transport fractions for the Mark I and the Mark III plants are listed in Table 4-3.

The BWROG did not develop transport factors for materials other than insulation materials. Where an approved transport factor is not available, licensees should either assume a factor of 1.0 or perform the testing/analysis necessary to justify another factor.

### NRC Evaluation

The URG recommendations were based primarily on data from small-scale debris generation and transport tests conducted by the BWROG. Because the staff had several concerns related to scaling small-scale transport test data to BWR conditions, the staff conducted confirmatory research to verify the accuracy of guidance provided by the URG. Specific concerns included whether or not the flow rates and flow durations in the small-scale tests were prototypical of conditions that would exist in BWR drywells

## Resolution Methodology

following a LOCA. The staff's analysis indicated the BWROG test flow velocities were on the order of 50% of prototypical velocities for a postulated large MSL break. It was not clear to the staff in evaluating the BWROG test program whether the test results were reasonable, conservative, or non-conservative if scaled to a full-sized plant. Therefore, the staff concluded that there is inadequate substantiation for the BWROG claim that the use of these test results would conservatively bound the drywell transport fraction. The NRC sponsored drywell debris transport study (see Section 2.2.3) [NUREG/CR-6369] demonstrated that a high percentage of fine debris could transport to the suppression pool and that the transport of the debris is both plant-specific and break-specific.

**Table 4-3. Combined Debris Generation and Transport Fractions for Mark I, III\***

Material	Above Grating	Below Grating
Darchem DARMET®	0.50	0.50
Transco RMI	0.50	0.50
Jacket NUKON™ with modified Sure-Hold Bands, Camloc® Strikers, and Latches	0.15	0.15
Diamond Power MIRROR® with modified Sure-Hold Bands, Camloc® Strikers, and Latches	0.50	0.50
Calcium Silicate with Aluminum Jacketing	0.10	0.10
K-Wool	0.27	0.78
Temp-Mat™ with Stainless Steel Wire Retainer	0.21	0.76
Knauf®	0.34	0.80
Jacketed NUKON™ with Standard Bands	0.28	0.78
Unjacketed NUKON™	0.28	0.78
Koolphen-K®	0.45	0.45
Diamond Power MIRROR® with Standard Bands	0.50	0.50
Min-K	1.0	1.0

\* Same fractions used for steam and water breaks.

Estimating the erosion of large fibrous debris depends upon estimating the quantity of debris subjected to erosion, the rate of erosion, and the duration of the erosion. The URG estimate of 25% of the debris being subjected to erosion was based on engineering judgment and was considered by the BWROG to be sufficiently conservative to ensure that a conservative estimate of the mass of eroded debris. The staff evaluation of the URG guidance for assuming erosion of large fibrous debris concluded that the guidance is adequate provided that the unthrottled ECCS flow does not continue for more than 3 hours. If unthrottled flow continues for more than three hours, the staff concluded that licensees should determine an appropriate fraction for their analysis. Note that NRC sponsored research demonstrated that erosion of NUKON™ occurs at a linear rate (see Section 2.1.1.5), which facilitates scaling NUKON™ erosion. Based on the overall level of conservatism in the URG guidance, the staff concluded that the URG guidance regarding the prediction of the erosion of large fibrous debris by break overflow was acceptable.

The staff reviewed the URG destruction fractions, i.e., the determination of the fractions of the destroyed insulation that would remain in "blanket material" form with low transport efficiency. On the basis of NRC-sponsored research, the staff noted a number of strengths and conservatisms associated with the URG guidance. The blanket arrangement used in the BWROG tests was conservative, (e.g., the orientation of blanket seams and jacket latches relative to air jet nozzle). The BWROG tests oriented seams and latches to maximize blanket destruction. In BWR drywells, insulation blankets could well be protected by other structures located in the jet pathway and that this protection was not accounted for in

## Resolution Methodology

the tests. In the BWROG air jet tests, the insulation blankets were oriented normal to the air jet to maximize destruction, but in BWR drywell, the majority of the piping (>65%) and therefore the insulation blankets would be located parallel to the jet flow. Thus, much less of the blanket would be subjected to the full jet flow. The weakness of the BWROG tests data was that the test data was very limited for several types of insulation, specifically Temp-Mat, K-wool, and some of the RMI, however the staff concluded that the URG methods for determining the ZOI and debris generation are sufficiently conservative to outweigh this weakness.

The primary criticism of the URG drywell debris transport guidance was the substantially reduced transport fractions applied to the Mark II containments relative to the Mark I and III containments. The NRC sponsored tests of the Mark II geometry did not identify any basis to conclude that the transport fraction for a Mark II containment would be different from that of a Mark I or a Mark III containment. Given the uncertainty associated with estimating the debris transport fraction, which includes the uncertainty associated with estimating size distribution and quantities of insulation damaged, the staff concluded that the BWROG transport fractions for fibrous debris in Mark II containments are both non-conservative and unacceptable and that Mark II containments should use the same transport fractions as the Mark I and Mark III containments.

### 4.3.2 Suppression Pool Debris Transport

The staff extensively considered the transport of debris within the suppression pool. NRC sponsored experiments [NUREG/CR-6224] explored the transport of both fibrous and RMI debris when subjected to chugging and post-chugging periods following a LOCA. The BWROG primarily relied on these experiments to develop guidance documented in the URG.

#### URG Guidance

The recommends that:

- Licenses not take credit for settling of debris in the pool during the high-energy phase of an accident during which the suppression pool undergoes through mixing.
- Licensees assume that all suppression pool debris will be resuspended during this phase.
- Licensees have the option to:
  - Determine the post-energy phase settling rates using the methods described in Appendix B to NUREG/CR-6224 or
  - Assume that there will be no settling of debris in the pool even after the high-energy phase terminates and the pool returns to quiescent conditions.

#### NRC Evaluation

The staff found no deficiencies in the recommendations documented in the URG, therefore the URG guidance for debris transport within the suppression pool is acceptable. However, the staff notes that Appendix B to NUREG/CR-6224 provides the required data only for selected types of insulation and particulates and licensees using the methods described therein for other types of insulation debris should be cautious about extrapolating the experimental data and models.

## Resolution Methodology

### 4.4 Strainer Head Loss

The BWROG devoted considerable resources to explore various generic designs for large passive strainers that can be used to replace the existing truncated core strainers. The four designs that were explored included: the 20-point star strainer, 60-point star strainer, a small-stacked disk strainer, and a large-stacked disk strainer. For each design, the BWROG obtained head loss data for various combinations of fibrous insulation debris, sludge, miscellaneous debris (referred to as the Recipe in the URG), and RMI debris. The general characteristics (size, shape, etc.) of the debris used in the BWROG head loss tests (see Section 3.3.2) were consistent with those used in the NUREG/CR-6224 study. Note that the debris characteristics selected for use in the NUREG/CR-6224 study were selected to maximize the resulting head loss.

#### URG Guidance

On the basis of the BWROG head loss test data, the BWROG developed two analytical methods to estimate head loss across the strainers; one method applied to fibrous/particulate debris beds and the other to metallic debris beds.

The fibrous/particulate debris beds method provided a non-dimensional head loss correlation that can be used to estimate the head loss across an alternate strainer design. The URG specified that this correlation is valid for lower debris loadings. For higher debris loadings, the correlation is not applicable and the URG recommends that licensees conduct strainer-specific testing.

The RMI debris bed method provided a stepwise process for estimating the strainer's RMI capacity and head loss across RMI debris beds. This method recognizes that RMI beds on strainers reach a saturation thickness beyond which flow-induced drag forces are not large enough to retain the RMI pieces on the strainer surface. The URG specified this saturation thickness as a function of the type of RMI debris and provided a correlation to estimate head loss across the RMI debris beds.

For mixed beds (i.e., fiber/particulate and RMI), the URG suggests that RMI does not contribute additional head loss in combination with other types of debris and that it may actually reduce the head loss. On that basis, the URG states that head loss for mixed beds can be evaluated by ignoring RMI altogether and estimating the head loss resulting from the other debris. Note that subsequent to the NRC review, the BWROG agreed to the NRC position that this may not be true in all situations, thereby agreeing to resolve the mixed bed issue on a plant-specific basis.

#### **NRC Evaluation**

The staff found the URG to contain valuable and useful data for predicting strainer head loss; however, the staff's review revealed several concerns regarding the quality and applicability of these data. Therefore, the staff conducted several confirmatory calculations to validate the calculational procedures provided in the URG and to examine the applicability of the calculational procedures to the actual plant conditions. On the basis of these analyses, the staff concluded that the head loss correlation in the URG is unreliable and incomplete for plant analyses, and is, therefore, unacceptable. The staff strongly recommends that utilities use vendor-provided data to qualify strainer designs, rather than relying on the correlations and calculational procedures specified in the URG. In addition, the staff recommended that licensees' designs should be able to accommodate experimental uncertainties associated with correlations and/or calculational methods developed by the vendors.

Specific criticisms and reasons leading to the rejection of the URG head loss correlations are:

## Resolution Methodology

- The URG model was developed with limited ranges of data i.e., debris loadings and debris compositions, strainer approach velocities, and strainer design; therefore, the use of the model beyond these limitations is especially risky because the models are non-mechanistic in nature. Specifically:
  - The fibrous or RMI correlations are based on data obtained for lower debris loadings than would be expected in many plants and the non-mechanistic correlations cannot be extrapolated to higher loadings without additional substantive experimental or analytical work. The correlations were based on data where the debris loading was not sufficient to fill the troughs in the strainer. The staff believes that an extrapolation will lead to non-conservative head loss estimates.
  - The correlations are specific to the limited types of insulations tested. The model was developed using data for NUKON™ insulation; therefore, its extension to other fibers is inappropriate without additional substantive experimental or analytical work.
  - The RMI saturation thickness guidance was primarily developed using data for a star strainer an assumption that the debris bed would resemble a sphere. Therefore, the RMI conclusions are specific to the strainer design tested and the type of RMI used in the test. No basis was provided for extrapolating to their RMI types and strainer designs. Further, the RMI debris size distributions, as tested, were limited.
- The staff has shown that, in many cases, the URG model under predicted the experimental data used to develop the model; therefore, a licensee would need to review each head loss prediction in detail relative to the applicable data, to ensure a valid prediction.
- The BWROG used limited data to develop the “bump-up” factor used to account for miscellaneous debris. Although the bump-up factors provide a conservative means for extending the fiber/particulate bed correlation to include other miscellaneous debris, this factor can create severe design impacts if used, because the factor was found to severely over predict the head loss in many cases.
- Reasonable steady-state conditions were not achieved in a significant number of the test runs that were used to develop the URG models.
- Some of the tests were conducted with thin fiber beds and large amounts of particulate debris. In these tests, the BWROG assumed that the debris bed captured all particulate debris. This assumption is incorrect because the amount of particulate captured in these tests was indeterminate and use of this data may lead to erroneous head loss predictions.
- The URG did not specify model validation, parameter sensitivity, or uncertainty analysis. This omission leaves open the question of whether a particular combination of input parameters could cause the URG model to severely under predict head loss.

The staff concluded that the BWROG generalized statement regarding the head loss of a fiber plus particulate debris bed bounding the head loss of a fiber, particulate, and RMI debris bed does not hold true in all situations. On the basis of the staff's analysis, the staff believes this issue should be resolved on a plant-specific basis. Licensees should ensure that their strainer vendor review the debris combinations of interest for their plant and ensures that the vendor data supports the head loss used in their plant-specific analysis.

## Resolution Methodology

The staff had the following specific concerns regarding the application of the URG:

- The staff is concerned that applying the URG strainer head loss model by blindly plugging numbers into a cookbook step-by-step procedure as outlined in the URG may lead to erroneous head loss predictions.
- The head loss predictions should use the same NUKON™ debris properties that were employed in developing the URG model because the models are not sufficiently mechanistic to account for the effects of varying these properties.
- The staff is concerned that applying the URG head loss prediction models to plant conditions that differ markedly from those conditions tested could lead to erroneous head loss predictions.
- The staff was concerned that the fibrous correlation might be used under high debris loading conditions where it is clearly invalid.
- While the staff conditionally agrees with the BWROG that the “thin-bed effects” are not likely to be an issue for the alternate strainer designs tested, particularly for strainers with deep crevices, the staff is concerned that experimental data are neither complete nor supported by sufficient qualitative analytical reasoning to substantiate the URG statement that the thin-bed effect is not a concern for alternative strainers.

### 4.5 Available Net Positive Suction Head (NPSH)

#### URG Guidance

The URG provides the BWROG guidance related to evaluating ECCS pump NPSH. The important points are:

- Licensees should not credit for containment overpressure greater than atmospheric pressure in determining available NPSH, unless such credit is in conformance with the plant's existing licensing basis.
- When evaluating available NPSH, licensees should consider a range of expected fluid temperatures unless the plant's licensing basis specifies the maximum expected fluid temperature. If specified, this temperature should be used unless plant's licensing basis is changed. The fluid temperature affects both the available NPSH margin and the head loss across the strainer.
- All strainers can be expected to be clean at the start of the postulated LOCA (i.e., it is not necessary to assume pre-existing blockage).
- If ECCS blockage analysis uses reduced ECCS flow through the strainers in order to meet NPSH requirements, licensees should exercise care to ensure that changes in ECCS flow rates are consistent with inputs and assumptions used in the evaluation model required by 10 CFR 50.46 to calculate ECCS cooling performance. Also, licensees should ensure that appropriate operating and emergency procedures are in place.
- Licensees should carefully evaluate the applicability of head loss correlations before applying such correlations to estimate head loss across the strainers.

## Resolution Methodology

- The ECCS strainer design should be consistent with the plant's limiting single-failure assumptions.

The BWROG notes in the URG that a part of a licensee's resolution to the strainer clogging issue could include a licensing basis change.

### NRC Evaluation

The staff finds no deficiencies in the recommendations presented in the URG. The staff has the following additional comments:

- Licensees should ensure that their calculations are consistent with their licensing bases. For instance, no operator action is typically credited for the first 10 minutes during a postulated LOCA, therefore NPSH should be evaluated at runout flow until the plant's licensing basis allows otherwise.
- Licensees are strongly encouraged to design strainers with performance characteristics that increase the NPSH margin above the minimum required.
- The staff concurred that additional containment overpressure (other than an amount already approved by the staff for the existing licensing basis) should not be used as part of the resolution of this issue.

### 4.6 References

RG-1.82, Regulatory Guide 1.82, Revision 2, "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident," U. S. Nuclear Regulatory Commission, May 1996.

Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," NRC Bulletin to BWR Licensees, May 6, 1996.

NEDO-32686, Rev. 0, "Utility Resolution Guidance for ECCS Suction Strainer Blockage," BWROG, November 1996.

NRC-SER-URG, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to NRC Bulletin 96-03 Boiling Water Reactor Owners Group Topical Report NEDO-32686, "Utility Resolution Guidance for ECCS Suction Strainer Blockage," Docket No. PROJ0691, August 20, 1998.

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NUREG/CR-6224, G. Zigler, J. Bridaue, D. V. Rao, C. Shaffer, F. Souto, W. Thomas, "Parametric Study of the Potential for BWR ECCS Strainer Blockage Due to LOCA Generated Debris," Final Report, U. S. Nuclear Regulatory Commission, October 1995.

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## **Resolution Methodology**

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NUREG/CR-6369, Volume 3, C. Shaffer, D. V. Rao, and J. Brideau, "Drywell Debris Transport Study: Computational Work," SEA97-3501-A:17, September 1999.

BWROG Letter OG95-388-161, Attachment 4, "BWR Owners Group Suppression Pool Sludge Generation Rate Data," June 1995.

BWROG Letter OG96-321-161, Attachment 2, "Suppression Pool Sludge Particle Distribution Data - Averaged Distribution Calculation," September 1994.

## **Resolution Methodology**

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### 5.0 INDUSTRY IMPLEMENTATION

As discussed earlier in this report, the NRC staff issued NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," on May 6, 1996. All BWR licensees were requested to implement appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA. The staff had identified three potential resolution options but allowed licensees to propose others that provided an equivalent level of assurance. The three options identified by the staff were: 1) to install a large capacity passive strainer designed with sufficient capacity to ensure that debris loadings equivalent to a scenario calculated in accordance with Section C.2.2 of RG 1.82, Revision 2 and do not cause a loss of NPSH for the ECCS, 2) install a self-cleaning strainer that automatically prevents strainer clogging by providing continuous cleaning of the strainer surface with a scraper blade or brush, and 3) install a backflush system that relies on operator action to remove debris from the surface of the strainer to prevent it from clogging. Option 1 had the advantages of being completely passive so that operator intervention was not required and it did not require an interruption of ECCS flow. Licensees choosing Option 1 for resolution were required to establish new or modify existing programs, as necessary, to ensure that the potential for debris to be generated and transported to the strainer surface does not at any time exceed the assumptions used in estimating the amounts of debris for sizing of the strainers in accordance with RG 1.82, Revision 2. Option 2, like Option 1, would not rely on operator action or interrupt ECCS flow but it did rely on an active component to keep the strainer surface clean that would be fully exposed to the LOCA effects in the suppression pool, therefore, appropriate measures must be taken to ensure its operability. With the selection of Option 3, extensive measures had to be taken: 1) to maximize the amount of time before clogging could occur; 2) to ensure that instrumentation and alarms indicate when strainer differential pressure increases; 3) to institute operator training on recognition and mitigation of a strainer clogging event; and 4) to implement surveillance to ensure the operability of the strainer instrumentation and backflush system. All licensees were requested to implement these actions by the end of the first refueling outage starting after January 1, 1997.

The BWROG undertook a research program with the intent 1) to evaluate several potential solutions for resolving the BWR strainer blockage, and 2) to develop a standard industry approach to resolution of the issue that complies with 10 CFR 50.46 and regulatory guidance provided in RG 1.82, Rev. 2. Among the resolution options explored experimentally by the BWROG included 1) several concepts for passive strainer designs, 2) passive strainers with backflush capability and 3) one self-cleaning strainer. In addition, BWROG carried out engineering studies to examine feasibility of adopting European solutions to the US BWR nuclear power plants. Based on the research, the BWROG concluded that replacing the existing strainers with large-capacity passive strainers is the preferred option. Furthermore, it is recommended that backflush should be considered for installation as a "defense-in-depth" option, but not as a front-line option. Similarly, BWROG concluded that although a self-cleaning strainer installation is a feasible option, licensees would have to resolve significant design, qualification and surveillance issues with the NRC on a plant specific basis. Thus BWROG all but ruled out all options other than installation of replacement passive strainers that are large and would reliably mitigate adverse impacts of debris accumulation and maintain sufficient NPSH Margin through out the accident.

The BWROG research into passive strainer design was limited in scope, with the primary focus of evaluating feasibility of certain concepts, such as star strainer and stacked-disk strainer. This research program and the results are summarized in the BWROG URG Volume 2 [NEDO-32686]. The primary design concept is to maximize the strainer surface area (i.e., area of the perforated surface through which water flows into the strainer) while minimizing the strainer circumscribed surface area. These design concepts were further refined or reengineered as required by the strainer vendors to suit a particular plant need.

## Industry Implementation

### 5.1 Replacement Strainer Designs

Four types of passive strainer designs were ultimately installed at one or more US Nuclear Power Plants. Although these designs differ significantly from each other, with the exception of some Mark III designs, the designs had one common feature in that the designs all rely on cavities, or troughs or traps where debris can collect on the strainer surface without significantly increasing the head loss across the strainers. Some Mark III designs simply relied upon lowering the strainer approach velocity.

#### PCI Stacked Disk Strainers

PCI strainers were designed, fabricated and installed by the Performance Contracting Incorporated (PCI). Figure 5-1 is a photograph of the PCI strainers installed at one of the BWRs. Among the unique design features of PCI strainer is the internal core tube incorporated to ensure uniform approach flow. The core tube is shown in Figure 5-2. Several prototypes of the PCI stacked disk strainer were tested for head loss measurements at the Electric Power Research Institute (EPRI) test facility and other test facilities. PCI reports provide a description of the test program and the results [PCI-97, PCI-NPD-CE03, CDI-96-22]. The hydraulic performance of PCI strainers was also tested by the BWROG [NEDO-32686] and as part of qualification testing by Commonwealth Edison [LaSalle-98]. LANL review of the PCI strainer design and performance characteristics is summarized in LA-UR-00-5159.

#### GE Stacked Disk Strainers (Proprietary)

The GE stacked disk strainer design differs from the conventional stacked disk strainer designs. The design details of the strainer and the hydraulic performance characteristics of the strainer were provided to NRC for review by GE [NEDC-32721P]. NRC review of the GE strainer performance and important conclusions are summarized in LA-CP-99-07 and the NRC safety evaluation report dated February 9, 1999. As of the date of this report, GE's hydrodynamic loads methodology is still undergoing NRC review. GE strainers were installed at Duane Arnold, Hatch-1, Oyster Creek, River Bend, Cooper, Fermi-2, Susquehanna -1, 2, Nine Mile Point - 2, Brown Ferry - 2, 3.

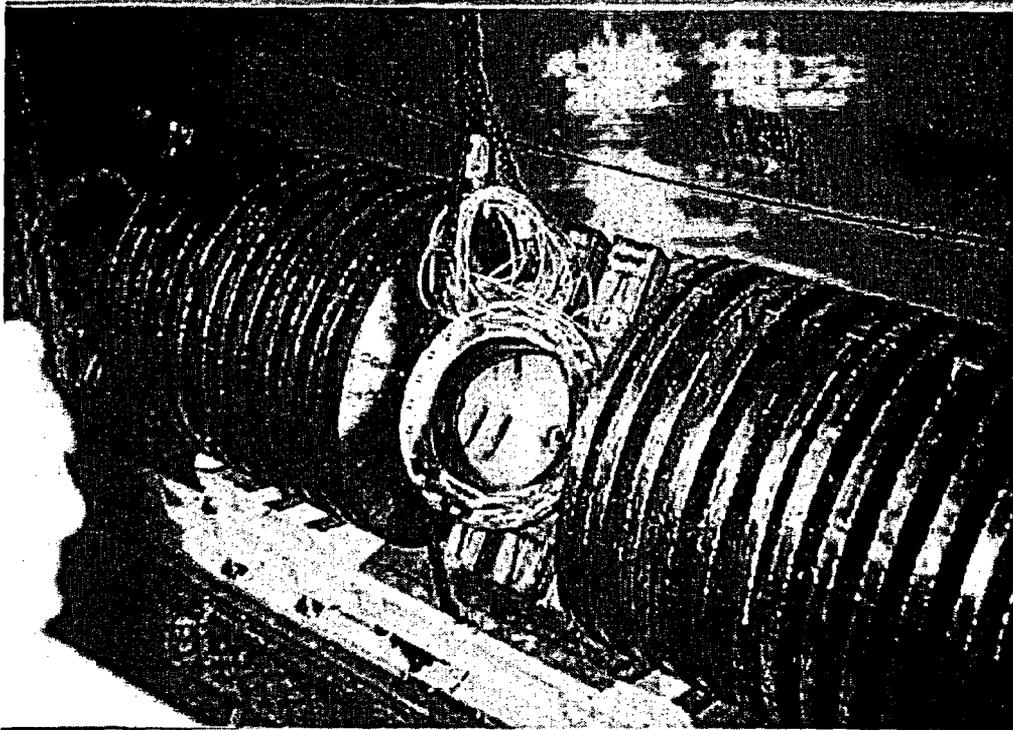
#### ABB Combustion Engineering Strainers (Proprietary)

The ABB strainers use another innovative type of approach to extend the screen area and thus reduce the approach velocity at the plate. The design was tested and demonstrated by ABB at the EPRI facility [ABB-97]. The ABB strainers were installed at Peach Bottom - 2, 3 and Limerick - 1, 2. LANL review of ABB strainer performance and related issues are summarized in the Limerick audit report entitled, "On-Site Audit of the Limerick Nuclear Power Plant Emergency Core Cooling System Strainer Blockage Resolution," dated January 21, 2000 [LANL-UR-00-426] and the NRC audit report [Memo-14-00].

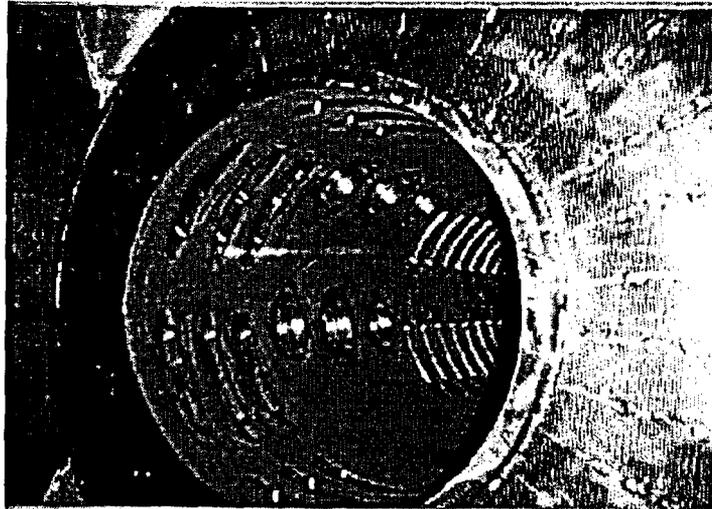
#### Mark III Strainers

The Mark-III BWR owners sponsored a research program to design and qualify a special strainer that is best suited for Mark III containments. This design takes advantage of the Mark III containment layout. The strainers are very large and are located on the floor of the suppression pool. Figure 5-3 is a photograph of an individual strainer module from the ¼ scale test facility. Several (up to 50) of these full-scale strainer modules are joined together to form the strainer in the plant. Figure 5-4 provides a pictorial representation of the assembled strainer. The resulting strainers have surface areas in excess of 6000 ft<sup>2</sup>. These strainers were tested at the quarter scale testing. NRC review comments on the testing program and the application of the test results in the plant submittals are summarized in the Grand Gulf Audit Report and LANL TER [LA-CP-00-18]. This strainer is also installed at Perry and Clinton.

## Industry Implementation



**Figure 5-1. PCI Stacked Disk Strainer being installed at Pilgrim Nuclear Power Plant.**



**Figure 5-2. The Core Tube used in the PCI Stacked Disk Strainers. Core tube provides structural support and also makes the approach flow uniform.**

## Industry Implementation

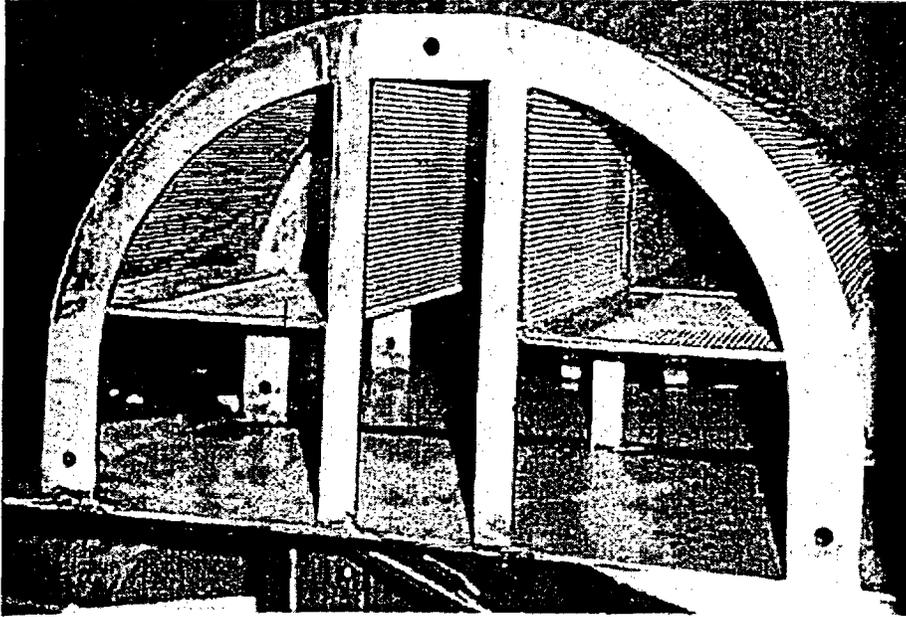


Figure 5-3. Individual Panel of Mark III strainer installed at Grand Gulf Nuclear Power Plant.

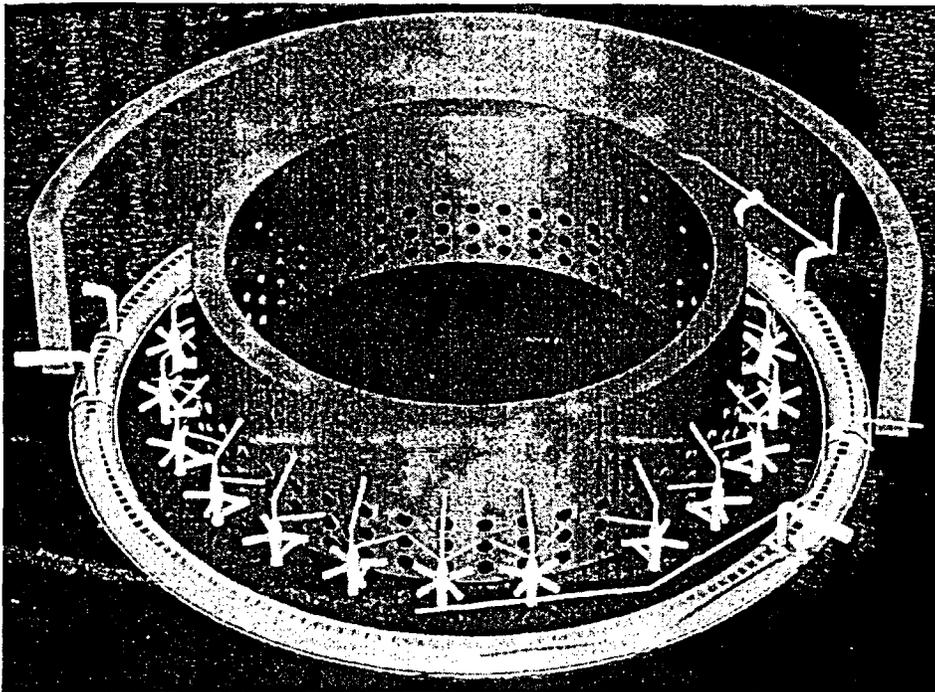


Figure 5-4. Pictorial Illustration of the Mark III strainer as installed in the Suppression Pool.

## Industry Implementation

The replacement strainer testing and qualification programs were also discussed as part of Section 3 of this report. Sections 3.1.2 through 3.1.5 provided NRC review of the test programs and important conclusions. The NRC review found that the hydraulic performance testing program(s) used by the individual vendors or licensees met the following objectives:

- The debris sizes used in the test program were prototypical of the debris expected to reach the strainers following a LOCA. Furthermore, the debris sizes compared favorably with those previously used in NRC test programs.
- The test procedures used to measure head loss across the strainers were reasonable, although in some cases the testing was terminated before steady state head loss was reached.
- Direct application of the head loss data obtained for the prototype strainers in the plant submittals is probably not likely because the plant-specific designs varied significantly from the test prototypes.

NRC notes two deficiencies of the test programs:

- In some cases, the debris loads used in the test programs did not cover the entire range over which the strainers may be applied. For example, limited, if any, head loss data is available for special debris such as aluminum RMI. This made strainer head loss estimation difficult.
- The strainer-specific head loss correlation(s) often lacked the appropriate theoretical or analytical support and therefore may not be extrapolated outside their original range of testing.

In spite of these reservations, NRC found that use of the data obtained from the test program(s) in plant specific calculations was reasonable provided the vendor or the licensee uses the data within the original range of testing or provides a theoretical basis for extrapolating the data to other strainer designs or debris loads.

### 5.2 Overview of Industry Implementation

From the beginning, it was recognized both by NRC and the BWROG that none of the passive strainer designs are standardized designs (i.e., one-size fits all type of strainers). Further, it was recognized that additional analyses would have to play an important role in sizing the strainer. As a result, considerable effort was devoted in the BWROG URG to provide detailed guidance on performing plant-specific analyses to estimate potential for debris loads on the ECCS Suction strainers following a LOCA, taking into consideration the guidance provided in the RG 1.82, Rev. 2.

Every single operating US BWR plant replaced the old semi-conical type strainers installed on Low Pressure Core Injection (LPCI) and Low Pressure Core Spray (LPCS) pump suctions. The industry addressed the requirements of NRC Bulletin 96-03 by installing large capacity passive strainers in each plant (i.e., NRC Option 1) with sufficient capacity. There were however a few plants that installed the replacement strainer before the BWROG URG and the URG SER were issued. The supporting analyses for these plants deviated in some cases significantly from the approved URG methodologies.

The NRC closely followed plant implementations through active participation in the industry meetings, review of plant-specific submittals, and by performing onsite audits of four nuclear power plants. Participation in the industry meetings facilitated exchange of information with the BWROG and

## Industry Implementation

individual licensees, and provided a means for NRC to clarify specific elements of the regulatory guidance (e.g., thin-bed head loss issue). The participation also helped the NRC staff to keep abreast with the methods used by the licensees and major uncertainties in some of the assumptions in sizing the strainers.

### 5.2.1 NRC Review of Plant Specific Submittals

Plant-specific submittals were provided by some licensees as part of licensing amendment requests, consistent with the requirements of 10 CFR 50.90 and 10 CFR 50.59. Most of the licensing amendments were related to licensee intent to use higher containment overpressure credit in the NPSH calculations.

Prior to the completion of the staff's review of the URG, some submittals were provided for NRC review during the strainer sizing and design phase to minimize the replacement project risk. A list of plants that provided replacement strainer details for NRC review are as follows: Browns Ferry – Units 2 and 3; Brunswick – Units 1 and 2; Cooper; Hatch – Units 1 and 2; Hope Creek – Units 1 and 2; LaSalle – Units 1 and 2; Limerick – Units 1 and 2; Peach Bottom – Units 2 and 3; Pilgrim – Unit 1; and Quad Cities – Units 1 and 2.

The sizes of strainers installed at some of the operating BWR plants are listed below in Table 5-1. As evident the replacement strainers are in general very large compared to pre-NRCB 96-03 strainers. The flow velocities at the plate for the replacement strainers ranged between about 0.1 ft/s and 0.001 ft/s.

**Table 5-1. The strainer design details of some of the plants reviewed by NRC**

Plant Name	System	Strainer Flow (GPM)	Fiber Debris Mass (lbm)	Sludge Mass (lbm)	Strainer Screen Area (ft <sup>2</sup> )	Strainer Circumscribed Area (ft <sup>2</sup> )	Strainer Approach Velocity (ft/s)
Duane Arnold	RHR	9600	255	357	388	47.43	0.002
	CS	3100	146	204	310	35.47	0.003
Hatch-1	All	5300	156	129	186	32.92	0.003
Oyster Creek	All	6133	189	98	475	63.49	0.011
River Bend	All	6400	1338	201	606	63.24	0.007
Cooper	RHR	9349	22	132	423	52.11	0.007
	CS	6135	38	226	236	34.20	0.002
Fermi-2	RHR	10000	33	163	387	47.26	0.005
	CS	6350	21	103	387	47.60	0.008
Susquehanna-1, 2	RHR	5000	103	1235	204	32.94	0.000
	CS	3175	41	489	131	21.57	0.001
Nine Mile Point-2	RHR	8200	15	8	353	48.18	0.099
	CS	7800	15	8	353	48.45	0.098
Browns Ferry	All	13542	4	205	298	42.67	0.003

NRC reviewed each plant submittal(s). Based on the review of the plant submittals it was the NRC's conclusion that the industry addressed the requirements of NRC Bulletin 96-03 by installing large capacity passive strainers in each plant (i.e., NRC Option 1). The strainers had sufficient capacity to accommodate the debris loads postulated to reach the strainer following a worst-case large break LOCA.

## Industry Implementation

The NRC found that in most cases the licensees had voluntarily used conservative assumptions in sizing and designing the replacement strainers. This voluntary conservatism was in addition to conservatism built-in to the URG guidance. In the case of Quad Cities, the NRC concluded that the debris generation and transport methods used to size the strainer were not consistent with the NRC or URG guidance. The confirmatory analyses performed by the NRC found that this inconsistency was a reflection of the fact that the licensee designed the strainer before the BWROG URG was issued but that the strainer itself is adequately sized to provide sufficient NPSH margin through out the accident.

### 5.2.2 Onsite Plant Audits

Four BWR plants were chosen for detail onsite audit by NRC staff; these plants are Limerick (BWR/4 Mark II), Dresden (BWR/3 Mark I), Duane Arnold (BWR/4 Mark I), and Grand Gulf (BWR/6 Mark III). The primary objective of the audit was to independently confirm the adequacy of the strainer size and to independently evaluate performance of the replacement strainers under LOCA conditions. In addition, the audit also focused on reviewing the supporting documentation to identify any concerns regarding the licensee's strainer design criteria and strainer performance analyses. In particular, the review of licensee strainer design analyses did the following:

1. Evaluated how the licensee estimated the quantity of debris used for sizing the strainer, that is, determined if the methodologies used for selecting the breaks were consistent with RG 1.82, Rev. 2, and provided reasonable estimates for debris generation and transport.
2. Evaluated the licensee's proposed strainer design criteria and strainer performance.

During the plant audit, NRC staff and its contractors undertook a detailed review of the documentation provided by the licensee. As necessary, the staff performed several independent calculations. The type of analyses performed by the staff during the audit included:

- 1) Debris Generation Calculations. Wherever possible and/or necessary, the NRC staff used the reactor piping layout drawings to independently map the zone of influence (ZOI) and estimate the quantity of debris contained within the ZOI.
- 2) Debris Loading Evaluations. In every case, the staff independently calculated the debris loads expected on the strainer following a LOCA and how these loadings compared with the licensee estimates. The comparison provided a measure of the margin-of-conservatism in the licensee calculations.
- 3) Strainer Head Loss and NPSH Evaluations. NRC staff used a modified version of the BLOCKAGE computer code to estimate head losses corresponding to various postulated ECCS responses (e.g., single-failure criterion). These head loss estimates were compared with the licensee estimates to draw conclusions regarding strainer performance.

In addition, NRC staff paid close attention to judge the effectiveness of the licensee foreign materials exclusion (FME) program. The results of the technical analyses are summarized in the audit reports. These TERs were:

- LA-CP-00-18, "On-Site Audit of the Grand Gulf Nuclear Station Emergency Core Cooling System Strainer-Blockage Resolution," January 3, 2000.
- LA-UR-01-738, "On-Site Audit of the Dresden Nuclear Power Plant Emergency Core Cooling System Strainer Blockage Resolution," Undated.

## Industry Implementation

- LA-UR-00-426, "On-Site Audit of the Limerick Nuclear Power Plant Emergency Core Cooling System Strainer Blockage Resolution," January 21, 2000.
- LA-CP-99-346, "On-Site Audit of the Duane Arnold Energy Center Emergency Core Cooling System Strainer Blockage Resolution," December 1999.

Table 52 provides a brief summary of the issue resolution for the audited plants. More detailed discussions on each plant are provided below.

**Table 5-2. Issue Resolution Summary for Audited Plants**

Plant	Design	Insulation Types Located in the Drywell	Plant Resolution	Resolution Basis	NRC Audit Findings
Grand Gulf Nuclear Station	BWR/6 Mark III	RMI Kaowool Calcium-Silicate Fiberglass	Increased existing strainer surface area from 170 ft <sup>2</sup> to 6253 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG supported by ¼ scale testing.	Licensee conservatively estimated debris generation, transport, and strainer head loss. NRC estimated head-losses substantially less than licensee estimate.
Limerick	BWR/4 Mark II	NUKON Min-K RMI**	Increased existing strainer surface area from 269 ft <sup>2</sup> to 2715 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG. Head-loss estimate less than 4 ft-water and NPSH margin of 12 ft-water.	Licensee conservatively estimated debris generation, transport, and strainer head loss. NRC estimated head-loss less than 2 ft-water.
Duane Arnold	BWR/4 Mark I	NUKON Calcium-Silicate** RMI** Lead Wool**	Increased existing strainer surface area from 38 ft <sup>2</sup> to 1359 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG and GE head loss correlation.	Licensee used NRC-approved methods to estimate debris generation and transport, and estimated conservative strainer head loss.
Dresden	BWR/3 Mark I	RMI NUKON Calcium-Silicate Asbestos** Amaflex**	Increased existing strainer surface area from 18.8 ft <sup>2</sup> to 475 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG and plant specific alternate methods.	NRC determined licensee strainers adequately sized, although inconsistencies and deviations from URG found in licensee analyses.

\* Majority of total insulation of this type.

\*\* Insulation screened out of analysis due to location, e.g., inside biological shield.

## Industry Implementation

### 5.2.2.1 Limerick Plant Audit Summary

#### Plant Resolution Approach and Description

Limerick Generating Station Units 1 and 2 are BWR/5 plants with Mark II containments. The replacement strainers were installed in Unit 1 during the 1998 spring outage and in Unit 2 during the spring outage in 1999. Limerick Units 1 and 2 are very similar in layout, insulation, and ECCS design. The NRC on-site audit focused primarily on reviewing documents related to design and installation of replacement strainers at Unit 1.

Limerick Units predominantly use NUKON™ mats<sup>1</sup> to insulate the primary piping. Limited quantities of Min-K® blankets<sup>2</sup> are used around the pipe-whip restraints. The plant estimated that 3900 ft<sup>3</sup> of NUKON™ and between 40 and 100 ft<sup>3</sup> of Min-K (and other miscellaneous fiberglass) insulation is present in the containment. The NUKON™ insulation is protected by stainless-steel jackets with normal J-hooks. The Min-K insulation is protected by steel jackets that are welded on all sides to provide additional structural strength. The reactor pressure vessel is insulated by Mirror™ brand reflective metallic insulation (RMI) cassettes.<sup>3</sup> However, the plant screened out RMI insulation from the analyses because there are no postulated breaks within the biological shields that could generate and transport debris. Therefore, for the purpose of this audit, the insulation of primary concern at this plant is of fibrous composition (NUKON™).

Before 1998, Limerick Unit 1 used truncated-cone strainers with 1/16-in. perforations<sup>4</sup> to protect against plugging of core-spray nozzles and ECCS pump seals and bearings. The net surface area of the strainers was 269 ft<sup>2</sup>. Total, licensing-basis, run-out, ECCS flow through the strainers is 59,900 GPM. The BLOCKAGE computer code was used to analyze the potential for loss of ECCS flow resulting from blockage of the old (pre-NRCB 96-03) strainers. It was found that an insulation volume of only 100 ft<sup>3</sup> was sufficient to induce frictional losses that exceed the NPSH margin (14.1 ft of water for the LPCI system and 10 ft of water for the LPCS system) within 10 min after a LOCA. This fact highlighted the need to replace the strainers at Limerick Unit 1.

The plant's resolution of the potential strainer-blockage issue was the installation of passive, large-capacity suction strainers designed and manufactured by ABB Combustion Engineering (ABB). The replacement strainers have a combined surface area of 2715 ft<sup>2</sup> (an increase of approximately 1100% compared with the old design). Table 5-3 provides geometric details of the strainers installed at Limerick Unit 1. The plant estimated the debris loading on the strainers following a postulated LOCA using methodologies discussed by the BWROG URG document. Estimates for quantities of fibrous debris generated were evaluated on a plant-specific basis using Method 2 of the URG, and all of the generated debris was assumed to be transported to the strainer (i.e., a transport factor of 1.0). The quantity of sludge used to size the strainer (2000 lb.) was chosen to bound the sum of suppression-pool sludge and other particulate debris, including qualified paint chips, foreign material, dust and dirt, rust from unpainted structures, and unqualified or indeterminate coatings. The FME Program and the Suppression Pool Cleanliness Program (SPCP) were implemented to limit the quantities of foreign materials and suppression pool sludge (e.g., clothing or plastic sheet) in the drywell.

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<sup>1</sup>NUKON is a trademark insulation manufactured and marketed by Performance Contracting, Inc. (PCI). It is a low-density (2/3 lbm/ft<sup>3</sup>) fiberglass mat.

<sup>2</sup>Min-K is a trademark fibrous-ceramic insulation. At Limerick, Min-K blankets were steel jackets.

<sup>3</sup>Mirror is trademark insulation manufactured and installed by Transco, Inc. It contains 2.5-mm stainless-steel foils enclosed in a welded stainless-steel cassette.

<sup>4</sup>The strainer plate has 5/8-in. perforations. However, the wire mesh around the plate has 1/16-in. square holes.

## Industry Implementation

Strainers were designed to handle the limiting single failure that would result in a loss of one LPCI pump and two LPCS pumps for injection into the core. The strainers also were designed such that sufficient NPSH margin exists to accommodate any uncertainties in the estimation of debris volume or head loss. Estimates of available NPSH were based on an assumed wetwell pressure of 14.7 psia (equivalent to no containment overpressure) and a suppression pool temperature of 212°F.

### Audit Conclusions

The licensee employed conservative methods to estimate the quantity of insulation debris generated in the drywell and transported to the ECCS suction strainer. The licensee's assumptions for non-insulation debris also appear reasonable. Similarly, the licensee calculation of the resulting head loss is conservative and is consistent with independent calculations performed by the Los Alamos staff using BLOCKAGE. The most likely head loss across the RHR-pump strainers as a result of debris-layer buildup will not exceed 2 ft-water compared with an available NPSH margin of 12 ft-water. The licensee head-loss estimate of 4 ft-water was obtained based on conservative estimates for debris loadings.

**Table 5-3. Geometric Details of the Limerick Strainers**

Specification	LPCI	Core Spray
<i>System Totals</i>		
Pumps	4	4
Flow Rate (GPM)	11,000	3,950
Modules Per Pump	4	2
Total Modules	16	8
Circumscribed Area Per Pump	186 ft <sup>2</sup>	78.5 ft <sup>2</sup>
Holding Volume Per Pump	85 ft <sup>3</sup>	30 ft <sup>3</sup>
Surface Area Per Pump	475 ft <sup>2</sup>	203 ft <sup>2</sup>
Velocity at Screen	0.052 ft/s	0.043 ft/s
Load Factor Per Pump*	0.18	0.07
<i>After Single Failure</i>		
Remaining Pumps	3	2
Modules on Remaining Pumps	12	4
Total Circumscribed Area	560 ft <sup>2</sup>	157 ft <sup>2</sup>
Total Holding Volume	255 ft <sup>3</sup>	60 ft <sup>3</sup>
Total Surface Area	1425 ft <sup>2</sup>	400 ft <sup>2</sup>
Load Factor Per Pump*	0.27	0.10
*Load Factor is the ratio of the debris value present on the strainer attached to one pump to the total debris volume present on all strainers.		

### 5.2.2.2 Dresden Plant Audit Summary

#### Plant Resolution Approach and Description

Dresden Units 2 and 3 are BWR/4 plants with Mark I containments. Dresden Units 2 and 3 are similar in layout and ECCS design, including the dimensions of the replacement strainers. Both units primarily use reflective metallic insulation (RMI) for insulating primary piping. The on-site audit reviewed documents related to the design and installation of replacement strainers at both units.

## Industry Implementation

Dresden Units 2 and 3 predominantly use 2.5-mil stainless steel, 2-mil stainless steel, and 6-mil aluminum RMI cassettes<sup>5</sup> for insulating the primary piping and reactor vessel. Limited quantities of NUKON™ mats are used around special components and certain piping segments. The plant estimates that between 90 and 100 ft<sup>3</sup> of NUKON™ insulation is present in the drywells of Units 2 and 3. Most of the NUKON™ insulation is protected by stainless-steel jackets with normal J-hooks. The flued head penetrations are insulated with asbestos (14 ft<sup>3</sup> per flued head penetration) and a small quantity of non-encapsulated NUKON™ (1.93 and 2.67 ft<sup>3</sup> in Units 2 and 3, respectively). Amaflex closed-cell foam insulation was used on the chilled water pipes. Additionally in Unit 3, small quantities of calcium-silicate insulation (8.24 ft<sup>3</sup>) are used on the reactor water clean-up (RWCU) pipes located in the mid-regions of the drywell. Using qualitative rationale, the licensee eliminated Amaflex foam insulation and asbestos from the analyses.

The Dresden Units 2 and 3 ECCS configuration includes an ECCS ring header circumscribing the torus with connecting piping to four inlet penetrations. In the torus, each connecting line is fitted with a flanged surface for mating to the ECCS strainer flange. The original pre-NRCB 96-03 suction strainers were truncated cone strainers. The base of the strainer where it mates the flange was about 18.3 in. in diameter and gradually decreased to 14.5 in. in diameter over its 10-in. length. The net surface area of each strainer was 4.7 ft<sup>2</sup>. The design flows for the LPCI and LPCS pumps are 5000 and 4500 GPM, respectively, for the short term and 2500 and 4500 GPM for the long term ( $t > 10$  min). This results in a design net ECCS flow of 29,000 GPM for the short term and 19,000 GPM for the long term. During the short term, the licensing-basis flow is different from the design-basis flow because of considerations such as single failure. Total, licensing-basis, ECCS flow through the four strainers combined during the short term is 32,200 GPM. This flow corresponds to an assumed failure of the LPCI Loop Select Logic (SF-LSL), which causes all four LPCI pumps to inject into a broken reactor recirculation loop at 5150 GPM each<sup>6</sup> and core decay heat removal to be achieved by two LPCS pumps operating at 5800 GPM each. The Dresden licensee's NPSH margin estimates were obtained subject to the following assumptions: (a) the operator would throttle the ECCS flow after 10 min and (b) the wetwell would be at a pressure higher than the atmospheric pressure by up to 9 psig during the short term and 2.5 psig over the long term.

The plant's resolution of the potential strainer-blockage issue is installation of passive, large-capacity stacked-disk suction strainers designed and manufactured by PCI. The geometrical details of the replacement strainers are listed in Table 5-4. The replacement strainers have a combined surface area of 475 ft<sup>2</sup> (an increase of approximately 2500% compared with the pre-NRCB 96-03 design). The plant estimated the debris loading on the strainer following a LOCA using methods and calculations developed and performed by its contractors. In many instances, these methods varied significantly from those discussed by the BWROG) in the URG document. Estimates for quantities of fibrous debris generated were evaluated on a plant-specific basis using Method 2 of the URG. No debris generation calculations were performed for RMI. Instead, the analyses assumed that sufficient RMI debris would be generated to form a "saturation bed" around the strainer. The quantity of sludge used to size the strainer was 370 lb. based on a conservative interpretation of "actual plant measurements."<sup>7</sup> Reportedly, this quantity

<sup>5</sup>RMI cassette construction consists of metallic foils of a certain type and thickness encapsulated by 304 stainless steel sheaths that are approximately 0.028 in. thick. The actual type and thickness of the foils varies depending on the manufacturer. Diamond Power Specialty Company (DPSC) uses 2.5-mil stainless steel and 6-mil aluminum foils, whereas Transco Products, Inc. (TPI) uses 2-mil stainless steel.

<sup>6</sup>This flow is not equal to the LPCI pump run-out flow. Instead, the Dresden licensee estimated fractional losses in the LPCI piping and Recirculation line. These losses then were coupled with pump curves to estimate the actual flow out the break assuming free release into the drywell.

<sup>7</sup>This value of 370 lb was based on one worst-case measurement with large uncertainties. The licensee believes that the actual sludge volume would be significantly lower than this value.

## Industry Implementation

corresponds to sludge generated during one power cycle; in other words, the licensee has committed to clean up the suppression pool during every outage. Other particulate debris included in the design basis included qualified paint chips, rust from unpainted structures, dust and dirt, and unqualified or indeterminate coatings. The FME Program and the SPCP were implemented to limit the quantities of foreign materials and suppression pool sludge (e.g., clothing or plastic sheet) in the drywell.

### Audit Conclusions

Based on the audit it is concluded that the Dresden strainer is adequately sized to handle the debris loading expected to reach the strainer following a LOCA. However, the audit noted several inconsistencies and errors in the licensee evaluations and documentation provided for review. For example, the licensee's technical approach for estimating debris loading following a LOCA is not consistent with the URG or the staff's SER on the URG in two areas: (1) the Dresden suppression pool transport calculations do not follow NRC/URG guidance and (2) the Dresden head loss estimates do not follow NRC/URG guidance. In addition, NRC concluded that Dresden NPSH evaluations had several inconsistencies.

**Table 5-4. Geometric Details of Dresden Strainers**

<i>Specification</i>	<b>Licensing Basis</b>	<b>Actual</b>
<b><i>Short Term (Unthrottled with SF-LSL)</i></b>		
Number of Strainers	3	4
Flow Rate (GPM)	32,200	32,200
Flow Rate per Strainer (GPM)	10733.	8050
Total Circumscribed Area (ft <sup>2</sup> )	115	143
Total Holding Volume (ft <sup>3</sup> )	19.2	25.6
Total Surface Area (ft <sup>2</sup> )	356	475
Velocity at Screen (ft/s)	0.201	0.151
Circumscribed Velocity(ft/s)*	0.625	0.469
<b><i>Long Term (Throttled with SF-LSL)</i></b>		
Flow Rate (GPM)	19,000	19,000
Velocity at the Plate (ft/s)	0.11	0.089
Circumscribed Velocity (ft/s)*	0.37	0.277
*Circumscribed velocity is calculated using a circumscribed area without the area of the ends as suggested by BWROG URG. This maximizes the velocity and the RMI "saturated bed thickness."		

### 5.2.2.3 Duane Arnold Plant Audit Summary

#### Plant Resolution Approach and Description

Duane Arnold Energy Center (DAEC) is a single BWR/4 unit with Mark I containment. Duane Arnold was the Reference plant used in the NUREG/CR-6224 study that formed the basis for BWR strainer blockage issue resolution. Replacement ECCS suction strainers were installed at the DAEC unit in

## Industry Implementation

1997. The NRC staff performed an on-site audit at DAEC of the analyses that formed the basis for the design and installation of replacement strainers.

The DAEC plant predominantly uses NUKON™ mats to insulate the primary piping. Limited quantities of 2.5-mil s/s reflective metallic insulation (RMI) cassettes and calcium-silicate insulation (encapsulated in aluminum jackets) were used around some of the piping located inside the drywell. Stainless steel jackets with normal Jhooks protected the NUKON™ insulation. RMI cassettes insulate the reactor pressure vessel. However, the plant screened out RMI insulation from the analyses because (a) there are no postulated breaks within the biological shields that could generate and transport debris from the RMI located on the reactor vessel, and (b) the RMI located on the process piping will be replaced by fiber-glass insulation gradually. The calcium-silicate insulation was screened out because it is located in the higher regions of the containment where potential for generation of large quantities of insulation is negligible. Therefore, for the purpose of this audit, the insulation of primary concern at this plant is of fibrous composition (NUKON™).

Before 1998, DAEC used truncated-cone strainers with 1/8-in. perforations to protect against plugging of core-spray nozzles and ECCS pump seals and bearings. The net surface area of the strainers was 38 ft<sup>2</sup>. Total, licensing-basis, run-out, ECCS flow through the strainers is 35,000 GPM. NUREG/CR-6224 analyzed the potential for loss of ECCS flow resulting from blockage of the pre-NRCB 96-03 strainers. It was found that an insulation volume of only 2 ft<sup>3</sup> (in combination with suppression pool sludge) was sufficient to induce frictional losses that exceed the NPSH margin within 10 min after a LOCA. This finding formed the basis for issuance of NRCB 96-03 and the development Revision 2 to the RG 1.82.

The plant's resolution of the potential strainer-blockage issue is (a) installation of passive, large-capacity suction strainers designed and manufactured by GE and (b) suppression pool cleaning to minimize the amount of sludge. The replacement strainers have a combined surface area of 1359 ft<sup>2</sup> (an increase of approximately 2600% compared with the old design). The plant estimated the debris loading on the strainer following a postulated LOCA using methodologies discussed by the BWROG in the URG document. Estimates for quantities of fibrous debris generated were evaluated on a plant-specific basis using Method 2 of the URG. The total volume of insulation debris transported to the suppression pool was estimated using the URG drywell transport factor of 0.28 (i.e., 28% of the volume of the generated debris would be transported to the suppression pool as a result of blowdown and washdown). No credit was taken for settling of the debris in the suppression pool. The quantity of sludge used to size the strainer (500 lbm) was chosen to bound the sludge generation rates measured by the licensee. Additional sources of particulate debris were considered in the strainer sizing analyses. These debris included qualified-paint chips, foreign material, dust and dirt, rust from unpainted structures, and unqualified- or indeterminate-coatings. The FME Program and the SPCP were implemented to limit the quantities of foreign materials (e.g., clothing or plastic sheet) and suppression pool sludge.

Strainers were designed to handle the limiting single failure that resulted in loss of one LPCI train (or two LPCI pumps) for injection into the core. Table 5-5 provides a listing of the important geometrical parameters of the replacement strainers. A sensitivity analysis was performed to assure that a slight variation in the debris quantity does not significantly affect NPSH margin. Estimates of NPSH margin were based on an assumed suppression pool temperature of 202 F over long-term. The NRC had previously approved a containment overpressure credit of 2.5 psig in calculating core spray NPSH margin.

### Audit Conclusions

Even if trace quantities of RMI do get transported, their effect on ECCS performance would be bounded by the fibrous debris impact.

## Industry Implementation

The licensee employed NRC approved methods to estimate the quantity of insulation debris generated in the drywell and transported to the ECCS suction strainer. The licensee's assumptions for non-insulation debris also are reasonable and conservative. Similarly, the licensee calculation of resulting head loss is conservative and is consistent with independent calculations performed by the staff, using BLOCKAGE.

Overall, it is concluded that DAEC strainer replacement strategy is sound and their analyses provide reasonable assurance that ECCS strainers are adequately sized to support long-term ECCS operation following a LOCA. Any uncertainties in licensee analyses are compensated by the conservatism factored in by the licensee. The most important conservatism is that the licensee did not take credit for settling of debris in the suppression pool.

**Table 5-5. Geometric Details of Duane Arnold Strainers**

PARAMETER	RHR#1	RHR#2	CS #3	CS #4
Outer Diameter (in.)	45	45	45	45
Active Length (in.)	49	49	37	37
Flange Diameter (in.)	24	24	24	24
Plate Area (Effective)	388.7	388.7	290.9	290.9
Circumscribed Area (ft <sup>2</sup> )	59.0	59.0	47.2	47.2
Gap Volume (ft <sup>3</sup> )	27.4	27.4	20.5	20.5

### 5.2.2.4 Grand Gulf Plant Audit Summary

#### Plant Resolution Approach and Description

Grand Gulf Nuclear Station (GGNS) is a BWR/6 plant with Mark-III containment. The replacement strainers were installed at GGNS during the 1998 outage. NRC staff performed an on-site audit at Grand Gulf of the analyses that formed the basis for the design and installation of the replacement. Included in the audit were the licensee's (Mississippi Power and Light Company) implementations of programs related to the general issue of ECCS strainer blockage, such as the FME and SPCP programs.

Grand Gulf Unit 1 predominantly uses Mirror™-brand RMI cassettes<sup>9</sup> to insulate reactor-system piping. Smaller inventories of Kaowool<sup>10</sup>, calcium silicate<sup>11</sup> (Ca-Sil), and fiberglass are also present. The plant estimated that 676 ft<sup>3</sup> of Kaowool (including miscellaneous fiberglass) and 908 ft<sup>3</sup> of Ca-Sil insulation are present in the total containment inventory. Aluminum jackets protect the Ca-Sil insulation. Some of the fiberglass is also encased in a metal jacket. The plant conducted extensive quarter-scale pool-transport testing for their complete replacement strainer design and small-scale testing for a segment of the design. No simulated RMI debris was observed to accumulate or remain attached on the strainer under design approach velocities, so RMI was screened out of their debris-generation, debris-transport, and head-loss

<sup>9</sup>Mirror is a trademark insulation manufactured and installed by Diamond Power Speciality Company. It contains 2.5-mm stainless-steel foils enclosed in a welded stainless-steel cassette.

<sup>10</sup> Kaowool is a spun mineral-fiber material with a manufactured density in the range of 7.4 to 8.4 lbm/ft<sup>3</sup> that is formed in blankets supported with wire mesh.

<sup>11</sup> Calcium silicate is a formed particulate material with fiber binding and a manufactured density in the range of 13 lbm/ft<sup>3</sup> that is encased in a metal covering.

## Industry Implementation

calculations. Therefore, the primary concern is estimating the combined effects of damaged fibrous (Kaowool and fiberglass) and damaged particulate (Cal-Sil) insulation.

Before 1998, Grand Gulf Unit 1 used truncated-cone strainers with 3/32-in perforations on a 5/32-in pitch to protect against plugging of core-spray nozzles and damage of ECCS-pump seals and bearings. The net surface area of the strainers was 170 ft<sup>2</sup>, and each strainer was 40-in long, 23.25 in at the base and 6 in at the top. Total, licensing-basis, run-out, ECCS flow is 44,895 GPM.

The plant's resolution of the potential strainer-blockage issue was the installation of passive, large-capacity suction strainers designed and manufactured by Enercon Services, Inc. The replacement strainers have a combined surface area of 6,253 ft<sup>2</sup> (an increase of approximately 3700% compared with the old design). This very large strainer is located on the suppression-pool floor. It serves as a common header for all six emergency core cooling systems (RHR-A, RHR-B, RHR-C, HPCS, LPCS, RCIC), so that any combination of operating systems can draw recirculation water through the same large screen area.

The plant estimated debris loading on the strainer following a postulated LOCA using methodologies discussed by the BWROG in the URG document. Estimates for quantities of insulation debris generated were evaluated following the intent of Method 1 in the URG. The quantity of sludge used to size the strainer (500 lbm) was chosen to bound the estimated generation rate. URG guidance was used to estimate quantities of other particulate debris including qualified paint chips, foreign material, dust and dirt, rust from unpainted structures, and unqualified or indeterminate coatings. The FME and SPCP programs were implemented to limit the quantities of foreign materials (e.g., clothing or plastic sheet) and suppression pool sludge in the drywell.

### Audit Conclusions

The licensee employed conservative methods to estimate the quantity of insulation debris generated in the drywell and transported to the ECCS suction strainer. The licensee's assumptions for non-insulation debris also appear reasonable. Similarly, the licensee calculation of resulting head loss is conservative and is significantly larger than the independent estimates by the staff.

### 5.3. Outstanding Issues

As of the date of this report, two head loss issues remain partially unresolved. The first of these issues is determination of the head losses for mixed fiber and RMI debris beds. The second issue is the long-term head loss, i.e., the head loss well beyond the times at which the tests were terminated.

#### 5.3.1 Head Losses for Mixed Fiber and RMI Debris Beds

While substantial data has been collected on mixed debris beds formed of a combination of fiber/sludge and RMI debris, a comprehensive methodology has not been completed. The primary reason for this situation is due to the general complexity and variability of these types of beds. The complexity includes such considerations as the flow resistant past RMI debris, the tortuosity of the flow, and the debris type, size, and shape. The variability includes the variety of strainer designs (size, shape, area, gap volume), bed morphology (thickness, porosity, formation, and compression), and accident conditions (approach velocity, temperature, water chemistry). A methodology that works for one set of tests, may not necessarily work for another. Further research will be required to develop a comprehensive methodology that adequately covers the complexity and variability of the problem.

For the conditions tested in the ARL tests (see Section 2.1.2.3), the RMI head loss tests demonstrated that introduction of prototypical RMI debris, in combination with fibrous debris and sludge, does not

## Industry Implementation

cause significantly different head losses than those observed with only fiber and sludge loadings. In fact, the most significant finding was that when RMI debris was mixed with fibrous debris and sludge, the head losses appeared to decrease when compared to similar conditions without RMI debris. The trend where the addition of RMI to fibrous bed reduced the head loss was not apparent in the tests without sludge. For the limited thicknesses and debris distributions tested, the mixed layers of RMI and fibrous insulation debris on the strainer produced higher head losses than did the layered (stratified) debris. When RMI debris was tested alone (no fibrous debris), the head losses were relatively small compared to the head losses of fibrous beds. Caution must be used in generalizing these specific conclusions and in applying the data to actual plant specific analyses since the number of experiments was limited, data scatter was significant, and not all prototypical situations were explored.

Limited data from other test programs conducted by the industry indicated that the head loss contribution due to the addition of RMI to a fiber/sludge bed could be significant in some situations. Selected PCI tests (see Section 3.1.4) evaluated the impact of adding RMI debris to a fibrous/sludge debris bed. Comparing two tests where the test parameters were essentially identical with the exception of the addition of RMI debris in one of the two tests, clearly demonstrated that the addition of the RMI increased the head loss significantly for higher flow rates.

The BWROG URG originally stated that head loss for mixed beds can be evaluated by ignoring RMI altogether and estimating the head loss resulting from the other debris. But the staff concluded that the BWROG generalized statement does not hold true in all situations. It must be further cautioned that data collected for the flat test strainer likely will not be directly applicable to the advanced complex-geometry strainers employed by the strainer replacement program. On the basis of the staff's analysis, the staff believes this issue should be resolved on a plant-specific basis. Licensees should ensure that their strainer vendor review the debris combinations of interest for their plant and ensures that the vendor data supports the head loss used in their plant-specific analysis. Subsequent to the NRC's review, the BWROG agreed to the NRC position that this may not be true in all situations, thereby agreeing to resolve the mixed bed issue on a plant-specific basis.

### 5.3.2 Long-Term Head Loss

Head loss test procedures have generally continued the measurement of the pressure drop across the debris bed, following the establishment of that bed, until the head loss became relatively stable. The time required to reach 'steady-state' has generally been on the order of tens of minutes. Occasionally tests were continued for a few hours. But some limited long-term testing has been conducted where the tests were continued for several days to examine the long-term effects of acidity on the debris bed. These tests have been described in ARL Test Report: 72-92/M670F, "Extended Head Loss Testing in Alkaline Water of Thermal Insulation used in Nuclear Containments," dated May 1992 and in a paper presented to the OECD/NEA Workshop on Sump Screen Clogging held in May 1999, entitled "Tests for Long Term Head Loss Across Fiberglass Insulation Debris Using Warm, Alkaline Water."

The concern of the long term testing was whether or not the structure of a fibrous debris bed remained stable in the long term. Although the long term testing was not extensive enough to conclusively determine the long term debris bed behavior, it appeared that fiberglass in debris beds is subject to dissolution in alkaline solutions. Further, the binder could lose its attachment to the fibers and the bed matrix could break down, so that the bed would become denser. The primary parameters affecting increased long term head loss appear to be water acidity level and temperature.

In the limited testing, the head loss was shown to increase gradually (approximately linear with time) until the test was terminated. The length of the long term tests ranged from 1 to about 11 days. An example of long term head loss is shown in Figure 5-5.

## Industry Implementation

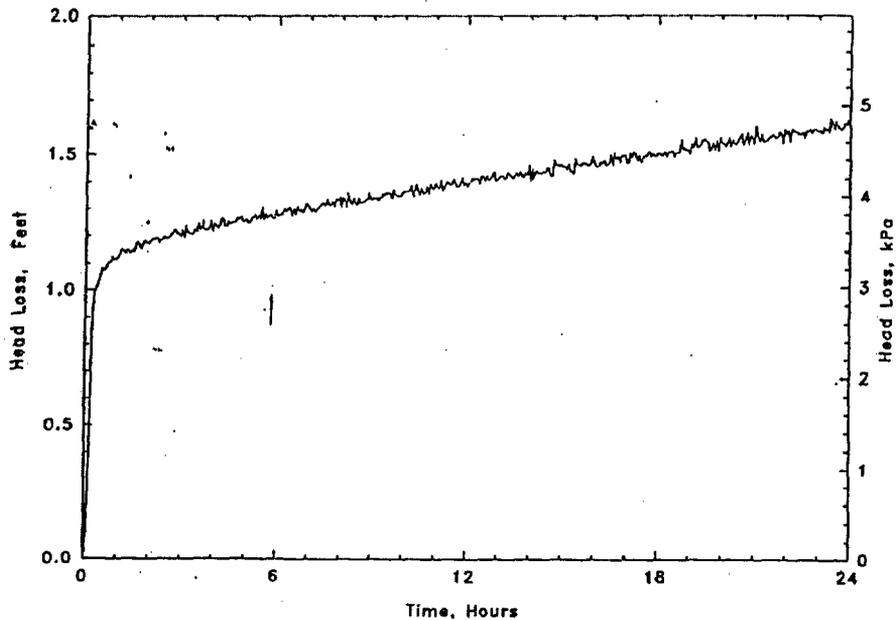


Figure 5-5. Example of Long Term Head Loss for a NUKON™ Debris Bed

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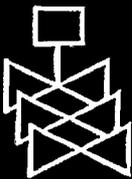
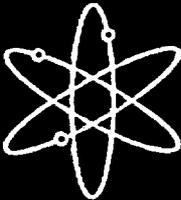
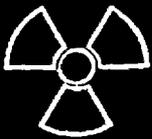
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# Knowledge Base for the Effect of Debris on Pressurized Water Reactor Emergency Core Cooling Sump Performance

Los Alamos National Laboratory

U.S. Nuclear Regulatory Commission  
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# Knowledge Base for the Effect of Debris on Pressurized Water Reactor Emergency Core Cooling Sump Performance

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Prepared by  
D.V. Rao, Principal Investigator

C.J. Shaffer,\* D.V. Rao,  
M.T. Leonard,\*\* K.W. Ross\*\*\*

Los Alamos National Laboratory  
Los Alamos, NM 87545

Subcontractors:

\*ARES Corporation  
851 University Blvd. S.E., Suite 100  
Albuquerque, NM 87106

\*\*dycoda, LLC  
70 Andres Sanchez Blvd.  
Belen, NM 87002

\*\*\*Innovative Technology Solutions Corporation  
6000 Uptown Blvd. N.E., Suite 300  
Albuquerque, NM 87110

B.P. Jain, NRC Project Manager

Prepared for  
Division of Engineering Technology  
Office of Nuclear Regulatory Research  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
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## ABSTRACT

This report describes the substantial base of knowledge that has been amassed as a result of the research on boiling-water reactor (BWR) suction-strainer and pressurized-water reactor (PWR) sump-screen clogging issues. These issues deal with the potential insulation and other debris generated in the event of a postulated loss-of-coolant accident within the containment of a light-water reactor and subsequently transport to and accumulation on the recirculation sump screens. This debris accumulation could potentially challenge the plant's capability to provide adequate long-term cooling water to the emergency core cooling system (ECCS) and the containment spray system pumps.

This report describes analytical and experimental approaches that have been used to assess the different aspects of sump and strainer blockage and to identify the strengths, limitations, important parameters and plant features, and appropriateness of the different approaches. The report is organized in the same order that an evaluation of the potential of sump screen blockage would be performed. The report provides background information on the issues, including significant United States regulatory developments regarding the resolution of the issue. The report is designed to serve as a reference for plant-specific analyses with regard to whether a sump or strainer would perform its function without preventing the operation of the ECCS pumps.

# CONTENTS

	<i>Page</i>
Abstract.....	iii
Executive Summary.....	xiii
Acknowledgements .....	xv
Abbreviations .....	xvii
Units Conversion Table .....	xix
1.0 Introduction.....	1-1
1.1 Historical Overview .....	1-1
1.2 Description of Safety Concern .....	1-8
1.3 Criteria for Evaluating Sump Failure.....	1-9
1.3.1 Fully Submerged Sump Screens.....	1-10
1.3.2 Partially Submerged Sump Screens.....	1-10
1.4 Description of Postulated Pressurized-Water Reactor Accidents.....	1-11
1.4.1 Overview .....	1-11
1.4.2 Large Loss-of-Coolant Accident .....	1-15
1.4.2.1 Reactor Coolant System Blowdown Phase.....	1-15
1.4.2.2 Emergency Core Cooling System Injection Phase.....	1-20
1.4.2.3 Recirculation Phase.....	1-21
1.4.3 Medium Loss-of-Coolant Accident.....	1-21
1.4.3.1 Reactor Coolant System Blowdown Phase.....	1-21
1.4.3.2 Emergency Core Cooling System Injection Phase.....	1-21
1.4.3.3 Recirculation Phase.....	1-21
1.4.4 Small Loss-of Coolant Accident.....	1-25
1.4.4.1 Reactor Coolant System Blowdown Phase.....	1-25
1.4.4.2 Emergency Core Cooling System Injection Phase.....	1-25
1.4.4.3 Recirculation Phase.....	1-25
1.4.5 Other Plant Design Features that Influence Accident Progression .....	1-25
1.5 Description of Relevant Plant Features that Influence Accident Progression .....	1-30
1.6 Regulatory Considerations.....	1-31
1.6.1 Code of Federal Regulations .....	1-32
1.6.2 Regulatory Guidance .....	1-34
1.7 Report Outline.....	1-35
1.8 References.....	1-35
2.0 Debris Sources .....	2-1
2.1 Actual Debris Found During Inspections .....	2-1
2.2 Loss-of-Coolant-Accident-Generated Debris.....	2-2
2.3 Loss-of-Coolant-Accident Exposure-Generated Debris .....	2-3
2.4 Operational Debris .....	2-4
2.5 Aging Effects on Mineral Fiber Thermal Insulation .....	2-5
2.6 Relative Timing and Debris Bed Composition .....	2-5
2.7 References.....	2-6
3.0 Debris Generation.....	3-1
3.1 Overview of the Mechanics of Debris Generation .....	3-1
3.1.1 Break-Jet Phenomena .....	3-4
3.1.1.1 Size/Configuration of Pipe Rupture .....	3-4
3.1.1.2 Break Effluent .....	3-4

	3.1.1.3	Obstacles.....	3-5
3.1.2		Debris Classification .....	3-5
	3.1.2.1	Size Classification of Fibrous Debris.....	3-6
	3.1.2.2	Size Classification of RMI Debris .....	3-6
3.2		Debris-Generation Testing.....	3-6
	3.2.1	Air-Jet Testing.....	3-9
	3.2.1.1	NRC BWR Drywell Inertial Capture Tests .....	3-9
	3.2.1.2	BWROG Air-Jet Impact Testing (AJIT).....	3-10
	3.2.2	Steam and Two-Phase Jet Testing.....	3-12
	3.2.2.1	Marviken Full-Scale Containment Experiments .....	3-12
	3.2.2.2	HDR Tests .....	3-12
	3.2.2.3	Karlshamn Caposil and Newtherm Tests .....	3-13
	3.2.2.4	Siemens Metallic Insulation Jet Tests (MIJITs).....	3-14
	3.2.2.5	Ontario Power Generation Test.....	3-15
	3.2.2.6	Battelle/KAEFER Tests .....	3-19
3.3		Debris-Generation Models and Analytical Approaches .....	3-22
	3.3.1	Cone Models.....	3-23
	3.3.1.1	ANSI/ANS Standard .....	3-23
	3.3.1.2	Three-Region Conical Jet.....	3-25
	3.3.2	Spherical Models .....	3-26
	3.3.2.1	Three-Region Spherical Model.....	3-26
	3.3.2.2	Equivalent-Volume Sphere Model.....	3-27
	3.3.3	Debris-Size Distribution as a Function of Local Jet Pressure.....	3-28
3.4		References.....	3-29
4.0		Airborne/Washdown Debris Transport in Containment.....	4-1
	4.1	Overview on Mechanics.....	4-2
	4.1.1	Accident Characterization Relevant to Debris Transport.....	4-2
	4.1.2	Plant Features Affecting Debris Transport.....	4-3
	4.1.3	Physical Processes and Phenomena Affecting Debris Transport .....	4-4
	4.1.4	Debris Characteristics Affecting Transport .....	4-8
	4.2	Airborne/Washdown Debris-Transport Testing.....	4-8
	4.2.1	Airborne Phase Debris-Transport Testing .....	4-8
	4.2.1.1	Separate-Effects Debris-Transport Tests.....	4-8
	4.2.1.2	Integrated-Effects Debris-Transport Tests .....	4-13
	4.2.1.3	Blowdown Experiments at Heissdampfreaktor (HDR) Facility .....	4-17
	4.2.1.4	Karlshamn Steam Blast Tests .....	4-18
	4.2.2	Airborne/Washdown Combined Phase Debris-Transport Testing.....	4-20
	4.2.2.1	BWROG Testing of Debris Transport Through Downcomers/Vents .....	4-20
	4.2.3	Washdown-Phase Debris-Transport Testing.....	4-23
	4.2.3.1	Separate-Effects Insulation Debris Washdown Tests .....	4-23
	4.2.3.2	Oskarshamn Nuclear Power Plant Containment Washdown Tests .....	4-25
	4.3	Airborne/Washdown Debris-Transport Analyses.....	4-25
	4.3.1	Evaluations of Operational Incidents .....	4-27
	4.3.1.1	Evaluation of Incident at Gundremmingen-1 .....	4-27
	4.3.1.2	Evaluation of Incident at Barsebäck-2 .....	4-27
	4.3.2	Phenomena Identification and Ranking Tables .....	4-31
	4.3.2.1	BWR PIRT .....	4-31
	4.3.2.2	PWR PIRT .....	4-31
	4.3.3	Airborne/Washdown Debris-Transport Evaluations.....	4-33
	4.3.3.1	MELCOR Simulation of Karlshamn Tests .....	4-33
	4.3.3.2	BWR Drywell Debris Transport Study (DDTS).....	4-34
	4.3.3.3	PWR Volunteer Plant Analysis .....	4-41
	4.3.4	Generalized Debris-Transport Guidance .....	4-44
	4.3.4.1	BWR URG Guidance for Drywell Debris Transport and the NRC Review .....	4-44

	4.3.4.2	Transport Fractions for Parametric Evaluation.....	4-48
4.4		Types of Analytical Approaches .....	4-49
4.5		Rules of Thumb.....	4-50
4.6		References.....	4-50
5.0		Sump Pool Debris Transport .....	5-1
5.1		Overview of Mechanics.....	5-1
	5.1.1	Accident Characterization.....	5-2
	5.1.2	Plant Features.....	5-3
	5.1.3	Physical Processes/Phenomena .....	5-4
	5.1.4	Debris Characteristics.....	5-7
5.2		Debris Transport in Pooled Water Testing.....	5-7
	5.2.1	Alden Research Laboratory Buoyancy and Transport Testing on Fibrous Insulation Debris .....	5-7
	5.2.2	Pennsylvania Power and Light Debris Transport Tests.....	5-10
	5.2.3	Alden Research Laboratory Suppression Pool Debris Sedimentation Testing .....	5-11
		5.2.3.1 Fibrous Debris Sedimentation Testing .....	5-12
		5.2.3.2 Reflective Metal Insulation Debris Sedimentation Testing .....	5-15
	5.2.4	Alden Research Laboratory Reflective Metallic Insulation Materials Transport Testing .....	5-15
	5.2.5	University of New Mexico Separate Effects Debris Transport Testing.....	5-17
	5.2.6	University of New Mexico Integrated Debris Transport Testing .....	5-24
	5.2.7	Bremen Polytechnic Testing of KAEFER Insulation Systems .....	5-29
	5.2.8	Alden Research Laboratory Testing of Owens-Corning Fiberglass (NUKON) Insulation.....	5-32
	5.2.9	STUK Metallic Insulation Transport and Clogging Tests .....	5-33
5.3		Debris Transport in Pooled Water Analysis .....	5-34
	5.3.1	Phenomena Identification and Ranking Tables .....	5-34
		5.3.1.1 Boiling-Water Reactor Phenomena Identification and Ranking Table .....	5-34
		5.3.1.2 Pressurized-Water Reactor Phenomena Ranking and Identification Table.....	5-34
	5.3.2	Boiling-Water Reactor Drywell Floor Pool Debris Transport Study .....	5-36
	5.3.3	Boiling-Water Reactor Suppression-Pool Debris-Transport Analysis .....	5-37
	5.3.4	Pressurized-Water Reactor Volunteer Plant Pool Debris Transport Analysis .....	5-38
	5.3.5	Nuclear Regulatory Commission Review of Licensee Experimental Approach to Sump Blockage Potential.....	5-38
	5.3.6	Computational Fluid Dynamic Simulations of UNM Integrated Debris-Transport Testing .....	5-41
5.4		Summary of Approaches to Modeling Containment Pool Transport .....	5-41
5.5		Guidance.....	5-43
5.6		References.....	5-44
6.0		Debris Accumulation.....	6-1
6.1		Locations of Concern.....	6-1
	6.1.1	Sump Screens .....	6-1
	6.1.2	Containment Flow Restrictions .....	6-3
6.2		Accumulation Patterns.....	6-3
6.3		Parameters Affecting Debris Accumulation .....	6-8
	6.3.1	Local Flow Field .....	6-8
	6.3.2	Local Geometry.....	6-9
	6.3.3	Submergence.....	6-9
	6.3.4	Debris Characteristics.....	6-10
6.4		Test Data.....	6-10
	6.4.1	BWR Strainer Tests .....	6-10
	6.4.2	Test Results for Vertical PWR Sump Screen Configurations.....	6-11
6.5		References.....	6-14

7.0	Debris Head Loss .....	7-1
7.1	Factors Affecting Debris-Bed Build-Up and Head Loss.....	7-1
7.1.1	Fibrous Debris Beds .....	7-1
7.1.2	Mixed Particulate and Fiber Beds.....	7-4
7.1.3	Reflective Metallic Insulation .....	7-6
7.1.4	Mixed Fiber and RMI Debris Beds.....	7-8
7.2	Review of Experimental Programs .....	7-9
7.2.1	Flat-Plate Strainers .....	7-11
7.2.2	Flat-Plate Strainers in Flumes .....	7-18
7.2.3	Prototype Module Strainer Testing .....	7-20
7.2.4	Semi-Scale Installed Strainer Testing.....	7-28
7.3	Analysis of Test Data .....	7-29
7.3.1	United States Nuclear Regulatory Commission Characterization of Head Loss Data .....	7-29
7.3.1.1	Fiberglass and Particulate Debris.....	7-29
7.3.1.2	Reflective Metallic Insulation .....	7-29
7.3.2	Analysis of Non-Flat-Plate Strainer Data .....	7-35
7.3.2.1	Phenomena of Debris Build-Up on Stacked-Disk Strainers .....	7-37
7.3.2.2	Application of the NUREG/CR-6224 Correlation to the PCI Strainer .....	7-37
7.4	Ongoing Research on Outstanding Issues .....	7-41
7.4.1	Long-Term Fibrous Debris Bed Stability.....	7-41
7.4.2	Calcium Silicate Debris Head Loss.....	7-42
7.4.3	Vertically Oriented Screens .....	7-42
7.5	References.....	7-42
8.0	Resolution Options .....	8-1
8.1	Overview of Resolution Options .....	8-1
8.2	Replacement Strainer Designs .....	8-2
8.2.1	Passive Strainer Designs Installed in U.S. Nuclear Power Plants .....	8-2
8.2.1.1	PCI Stacked-Disk Strainers .....	8-4
8.2.1.2	General Electric Stacked-Disk Strainers .....	8-6
8.2.1.3	ABB Combustion Engineering Strainers .....	8-6
8.2.1.4	Mark III Strainers .....	8-7
8.2.2	Active Strainer Designs.....	8-8
8.2.2.1	BWROG Research Into Active Strainer Concepts .....	8-8
8.3	Overview of U.S. BWR Plant Implementation.....	8-9
8.3.1	NRC Review of U.S. Plant Implementation .....	8-9
8.3.2	Onsite Plant Audits .....	8-10
8.4	Special Considerations for PWR Resolution Options .....	8-12
8.4.1	Flow Path Blocking .....	8-12
8.4.2	Strainer Penetration.....	8-12
8.4.2.1	Spray Nozzles.....	8-13
8.4.2.2	Fuel Bundles.....	8-13
8.4.3	LOCA Jet and Missile Considerations .....	8-15
8.4.4	Feasibility and Efficiency of Backflushing.....	8-15
8.4.5	Debris Induced Mechanical Structural Loadings .....	8-15
8.5	References.....	8-16
9.0	Significant Events .....	9-1
9.1	LOCA Debris Generation Events .....	9-1
9.2	Events Rendering a System Inoperable .....	9-2
9.3	Debris-Found-in-Containment Events .....	9-5
9.4	Inadequate Maintenance Leading to Potential Sources of Debris.....	9-8
9.5	Sump-Screen Inadequacies.....	9-10
9.6	References.....	9-12

10.0	Summary and Conclusions.....	10-1
10.1	Summary of Knowledge Base .....	10-1
10.2	Conclusions .....	10-13

### Figures

1-1	Illustration of Sump Features and Parameters.....	1-9
1-2	Sump-Screen Schematics.....	1-10
1-3	Flow Chart of Analysis Process.....	1-12
1-4	PWR LLOCA Accident Progression in a Large Dry Containment.....	1-19
1-5	PWR MLOCA Accident Progression in a Large Dry Containment.....	1-24
1-6	PWR SLOCA Accident Progression in a Large Dry Containment .....	1-29
3-1	Example ZOI at a Postulated Break Location .....	3-2
3-2	Variation in the ZOI Shape with DEGB Separation and Offset.....	3-5
3-3	Fiberglass Insulation Debris of Two Example Size Classes .....	3-7
3-4	Inner Construction and Installation of a Typical RMI Cassette .....	3-8
3-5	RMI Foil Before/After "Crumpling" (Left) and Crumpled RMI Foil Debris (Right).....	3-8
3-6	Configuration of the CEESI Test Facility for the NRC/SEA BWR Drywell Debris-Transport Tests.....	3-10
3-7	Typical RMI Debris Generated by Large Pipe Break .....	3-15
3-8	RMI Debris Observed in Siemens Steam-Jet Impact Tests.....	3-15
3-9	Insulation Target Mounting Configuration in OPG Test (Longitudinal Seam at 45°, Circumferential Seam Offset).....	3-17
3-10	Typical Calcium-Silicate Debris Collected from an OPG Two-Phase Jet Test.....	3-18
3-11	Test Configuration of Aluminum-Clad Calcium-Silicate Insulation (Distance from Break of 9D and Longitudinal Seam at 45°).....	3-19
3-12	Post-Test Configuration of Aluminum-Clad Fiberglass Insulation (Distance from Break of 10D and Longitudinal Seam at 45°).....	3-20
3-13	Configuration of the Target Field in the Battelle/KAEFER Tests .....	3-20
3-14	Typical View of Target Destruction in Battelle/KAEFER Tests .....	3-22
3-15	ANSI/ANS Standard Free-Expanding Jet Model.....	3-24
3-16	Isobar of Damage Pressure $P_x$ within a Fixed, Free-Expanding Jet.....	3-24
3-17	Illustration of the Three-Region, Two-Phase Conical-Jet ZOI Model.....	3-26
3-18	Illustration of the Three-Region, Two-Phase Spherical ZOI Model.....	3-27
3-19	Debris Size as a Function of Local Jet Pressure .....	3-30
4-1	Separate-Effects Insulation Debris-Transport/Capture Test Apparatus.....	4-12
4-2	Typical Fibrous Debris Capture by a Wetted Pipe .....	4-13
4-3	CEESI Air-Jet Test Facility.....	4-14
4-4	Samples of Debris Generated in the CEESI Tests .....	4-16
4-5	Typical Debris Deposition on a Grating in CEESI Tests .....	4-16
4-6	Capture of Small Debris by Grating.....	4-17
4-7	ABB-Atom Containment Experimental Arrangement .....	4-19
4-8	Schematic of 1/8-Scale Mark I Configuration Test Apparatus .....	4-21
4-9	Schematic of 1/8-Scale Mark II Configuration Test Apparatus .....	4-22
4-10	Schematic of Washdown Test Apparatus .....	4-24
4-11	Time-Dependency of 1-in. Insulation Blanket Material Under Break-Flow Conditions .....	4-26
4-12	Typical Condition of Debris After Exposure to Water.....	4-26
4-13	Schematic Illustrating the Complexity of Drywell Debris Transport .....	4-36
4-14	Sample Drywell Debris Transport Logic Chart .....	4-37
5-1	Suppression Pool Sedimentation Test Apparatus.....	5-13
5-2	Fibrous Debris Classifications .....	5-14
5-3	Fibrous Debris Terminal Settling Velocities.....	5-14
5-4	Typical Large (6-in.) RMI Debris in Suspension During Chugging .....	5-16
5-5	Photo of Large UNM Flume Test Apparatus .....	5-19
5-6	Diagram of Large UNM Flume Test Apparatus.....	5-19

5-7	Photo of Large UNM Flume Inlet Flow Conditioning Apparatus .....	5-20
5-8	Typical Test Sample of LDFG Insulation Debris .....	5-20
5-9	Typical Test Sample of Aluminum RMI Insulation Debris .....	5-21
5-10	Typical Test Sample of Paint-Chip Debris .....	5-21
5-11	Comparison of Terminal Settling Velocities .....	5-22
5-12	Comparison of Incipient and Bulk Tumbling Velocities .....	5-23
5-13	Comparison of Incipient Lift Velocities to Incipient Tumbling Velocities .....	5-23
5-14	Steel Tank Used in Integrated Testing .....	5-26
5-15	Integrated Test Tank Outlet Box .....	5-26
5-16	Test Configuration A .....	5-27
5-17	Test Configuration B .....	5-27
5-18	Test Configuration C .....	5-27
5-19	Test Configuration D .....	5-27
5-20	Samples of KAEFER Insulation Systems Tested .....	5-31
5-21	Bremen Buoyancy Test Illustration .....	5-32
5-22	Typical Fibrous Debris Transport in the Suppression Pool .....	5-39
5-23	Configuration of Millstone-2 Debris-Transport Experiment .....	5-39
5-24	Sample CFD Prediction of Flow Velocities for One Test Configuration .....	5-42
6-1	Examples of Various Recirculation Sump Configurations in PWRs .....	6-2
6-2	Example of Containment Floor Flow Restriction that Might Result in Diversion of Flow From the Recirculation Sump .....	6-3
6-3	Debris Accumulation Profiles Observed in Linear Flume Experiments .....	6-6
6-4	Photographs of Debris Accumulation on a 1-ft X 1-ft Vertical Screen in a Large Linear Flume ...	6-7
6-5	Typical Buildup of Fine Fibrous Debris that Easily Remains Suspended .....	6-8
6-6	Example Installation of a BWR Stacked-Disk ECCS Recirculation Suction Strainer .....	6-12
6-7	Fibrous Debris Accumulation on a Stacked-Disk Strainer .....	6-12
6-8	RMI Debris Accumulation on a Stacked-Disk Strainer .....	6-13
7-1(a)	High-Resolution Scanning Electron Microscope Image of Fibrous Debris .....	7-2
7-1(b)	Low-Resolution Scanning Electron Microscope Image of Fibrous Debris .....	7-2
7-2	Head Losses vs Fiber Volume for Fixed Quantities of Particulate .....	7-5
7-3	Aluminum RMI Accumulation on a Stacked Disk Strainer .....	7-8
7-4(a)	RMI/Fiber/Sludge Post Head Loss Test Debris Bed .....	7-10
7-4(b)	RMI and Fiber Accumulation on a Strainer .....	7-10
7-5	Equivalency Between a Truncated Cone Strainer Debris Accumulation and Flat-Plate Strainer Simulation .....	7-12
7-6	Vertical Flat-Plate Strainer Head Loss Facility at Alden Research Laboratory .....	7-13
7-7(a)	Flat-Plate-Strainer Head Loss Facility Used in KKL Test .....	7-16
7-7(b)	Gravity Head Loss Test Setup Used in the BWROG Tests .....	7-17
7-8(a)	Schematic of the Horizontal Flume Used in NRC-Sponsored ARL-Conducted PWR Sump Screen Tests) .....	7-19
7-8(b)	Picture of Large RMI Foil Accumulation on the Vertical Screen .....	7-19
7-9(a)	Flume Test Setup Used in the CDI Experiments for Millstone 2 .....	7-21
7-9(b)	Test Setup Used for Transport and Head Loss Measurement in the KKB Plant-Specific Tests .....	7-22
7-10	STUK RMI Head Loss Test Setup for Prototype Strainer .....	7-23
7-11	BWROG Prototype Strainer Module Test Setup .....	7-25
7-12	Measured Head Loss as Function of Strainer Debris Loading for Specialty Strainers .....	7-26
7-13	Semi-Scale Test Facility Used in Grand Gulf Quarter-Scale Testing .....	7-29
7-14	Prototype Strainer Module Test Setup Used in Grand Gulf Prototype Tests .....	7-30
7-15	Idealized View of Flow Through an RMI Bed .....	7-32
7-16	Comparison of NRC/ARL Test Data with LANL Correlation .....	7-34
7-17	Comparison of BWROG Test Data for Truncated Cone Strainer with LANL RMI Correlation .....	7-34
7-18	Comparison of LANL RMI Correlation Predictions for Truncated Cone Strainer with the Experimental Data Obtained from LaSalle Tests .....	7-36
7-19	Comparison of LANL RMI Predictions with the STUK Head Loss Data .....	7-36
7-20	Schematic Representation of Debris Build-Up on a Stacked-Disk Strainer .....	7-38

7-21	Point-by-Point Comparison of Correlation Predictions with PCI Head Loss Data .....	7-39
7-22	Dimensionless Representation of Stacked-Disk Strainer Effective Area as a Function of Debris Volume .....	7-40
7-23	Example of Long Term Head Loss for a NUKON™ Debris Bed .....	7-41
8-1	BWROG Prototype Module Test Program .....	8-3
8-2	Measured Head Loss as a Function of Strainer Debris Loading for Typical Advanced Passive Strainers .....	8-3
8-3	PCI Stacked-Disk Strainer Being Installed at Pilgrim Nuclear Power Plant .....	8-5
8-4	The Core Tube Used in the PCI Stacked-Disk Strainers .....	8-5

### Tables

1-1	Important Parameters Tracked and Their Relevance .....	1-13
1-2	Debris Generation and Transport Parameters: LLOCA-Large Dry Containment .....	1-16
1-3	Debris Generation and Transport Parameters: LLOCA-Ice Condenser Containment .....	1-17
1-4	PWR LLOCA Sequences .....	1-18
1-5	Debris Generation and Transport Parameters: MLOCA-Large Dry Containment .....	1-22
1-6	Debris Generation and Transport Parameters: MLOCA-Ice Condenser Containment .....	1-23
1-7	Debris Generation and Transport Parameters: SLOCA-Large Dry Containment .....	1-26
1-8	Debris Generation and Transport Parameters: SLOCA-Ice Condenser Containment .....	1-27
1-9	Debris Generation and Transport Parameters: SLOCA-Sub-Atmospheric Containment .....	1-28
3-1	Damage Pressures for Insulation Materials Found in U.S. PWRs .....	3-4
3-2	Size Classification Scheme for Fibrous Debris .....	3-7
3-3	Typical Size Characteristics of RMI Debris .....	3-9
3-4	Measured Particle-Size Distribution from Newtherm 1000 (Calcium-Silicate) Erosion Tests .....	3-14
3-5	Test Matrix for the OPG Calcium-Silicate Jet Impact Tests .....	3-17
3-6	Size Distribution of Calcium-Silicate Debris in Tests Where Insulation Was Liberated .....	3-18
3-7	Size Distribution of Fiberglass Debris in Tests Where Insulation Was Liberated .....	3-20
4-1	Physical Processes and Phenomena Affecting Airborne/Washdown Debris Transport .....	4-4
4-2	Thermal-Hydraulic Airborne Processes and Phenomena .....	4-5
4-3	Airborne Debris-Transport Mechanisms .....	4-6
4-4	Thermal-Hydraulic Processes and Phenomena .....	4-7
4-5	Washdown Debris-Transport Mechanisms .....	4-7
4-6	Airborne/Washdown Debris Transport Testing .....	4-9
4-7	Small Fibrous Debris Capture Fractions .....	4-18
4-8	Airborne/Washdown Debris-Transport Analyses .....	4-28
4-9	Highly Ranked Phenomenon from BWR Drywell Transport PIRT Table .....	4-32
4-10	Processes and Phenomena Ranked as High .....	4-33
4-11	Highly Ranked Processes and Phenomena for the Containment Above the Sump Pool .....	4-34
4-12	Study Transport Fractions for Main-Steam-Line Breaks .....	4-40
4-13	Study Transport Fractions for Recirculation Line Breaks .....	4-40
4-14	Study Transport Fractions for All Insulation Located in ZOI .....	4-41
4-15	Debris Size Categories and Their Capture and Retention Properties .....	4-43
4-16	Fractions of Blanket Material with Low Transport Efficiency .....	4-45
4-17	URG Drywell Transport Fractions .....	4-46
4-18	URG Combined Debris-Generation and Transport Fractions for Mark I, III .....	4-47
4-19	Debris-Transport Fractions Estimates Used in Parametric Evaluation .....	4-50
5-1	Summary Data for Diffused Flow Entry Inlet Conditions .....	5-22
5-2	Water Chemical Conditions in KAEFER Insulation Buoyancy Tests .....	5-31
5-3	Flow Velocity Needed to Initiated Motion of NUKON Insulation Fragments .....	5-33
5-4	Highly Ranked Phenomena from BWR Drywell Floor Pool Debris Transport PIRT Table .....	5-35
5-5	Highly Ranked Processes and Phenomena for the Debris Transport in a PWR Containment Sump Pool .....	5-35
6-1	Minimum Screen Approach Velocity for Debris to "Flip Up" or be Hydraulically "Lifted" Onto a Sump Screen .....	6-13
7-1	Head Loss Test Data for Mixtures of Calcium-Silicate and Fiberglass Insulation Debris .....	7-6

7-2	Characteristic Parameters for RMI Debris Beds .....	7-32
7-3	Geometric Details of the Portion of the Strainer Tested in the LaSalle Test Program.....	7-35
8-1	Total Strainer Area and Vendor for Each BWR Plant Responding to NRCB 96-03 .....	8-10
8-2	Issue Resolution Summary for Audited Plants.....	8-11
8-3	Fibre Penetration, 4-mm Perforated Plate .....	8-14
8-4	Fibre Penetration, 4-mm Perforated Plate .....	8-14
9-1	Events With LOCA Generated Insulation Debris .....	9-2
9-2	Events Rendering a System Inoperable.....	9-3
9-3	Events With Debris Found Inside Containment .....	9-6
9-4	Events of Inadequate Maintenance Potentially Leading to Sources of Debris .....	9-9
9-5	Events Where Inadequacies Found in Sump Screens.....	9-11

## EXECUTIVE SUMMARY

In the event of a loss-of-coolant accident (LOCA) within the containment of a light-water reactor, piping thermal insulation and other materials in the vicinity of the break will be dislodged by the pipe break and steam/water-jet impingement. A fraction of this fragmented and dislodged insulation and other materials, such as paint chips, paint particulates, and concrete dust, will be transported to the containment floor by the steam/water flows induced by the break and by the containment sprays. Some of this debris eventually will be transported to and accumulated on the recirculation-sump suction screens in pressurized-water reactor (PWR) containments or on the pump-suction strainer in boiling-water reactor (BWR) containments. Debris accumulation on the sump screen or strainers could challenge the plant's capability to provide adequate, long-term cooling water to the emergency core cooling system (ECCS) and the containment spray system pumps.

As a result of the research on the BWR suction-strainer and PWR sump-screen clogging issues, a substantial base of knowledge has been amassed that covers all aspects of the issues from the generation of debris to the head loss associated with a debris bed on a strainer or screen. This report describes the different analytical and experimental approaches that have been used to assess the various aspects of sump and strainer blockage and identify the strengths, limitations, important parameters and plant features, and appropriateness of the different approaches. The report also discusses significant United States (U.S.) Nuclear Regulatory Commission (NRC) regulatory actions regarding resolution of this issue. In essence, the report is designed to serve as a reference for plant-specific analyses in regard to whether the sump or strainer would perform its function without preventing the operation of the ECCS pumps.

This report is intended primarily for analyzing PWR sump-screen clogging issues, largely because the BWR issue had been resolved at the time the report was written. Nevertheless, the report also will be valuable in the review of any additional analyses for BWR plants as well. A majority of the strainer blockage research to date was conducted specifically for the resolution of the BWR issue; however, most of this research is also directly applicable to the

resolution of the PWR issue. Therefore, both BWR and PWR research and analytical approaches are discussed, and the applicability of that research, i.e., BWR vs PWR, is stated.

The report provides background information (Section 1) regarding the PWR containment sump and the BWR suction-strainer debris clogging issues. This background information includes a brief historical overview of the resolution of the BWR issue with a lead into the PWR issue, a description of the safety concern relative to PWR reactors, the criteria for evaluating sump failure, descriptions of postulated accidents, descriptions of relevant plant features that influence accident progression, and a discussion of the regulatory considerations.

The purpose of a sump screen is to prevent debris that may damage or clog components downstream of the sump from entering the ECCS and reactor coolant system. Debris accumulation across a sump screen would create a pressure drop across that screen that potentially could cause insufficient flow to reach the pump inlet. The knowledge-base report is organized in the same manner that an evaluation of the potential of sump screen blockage would be performed. These steps are the identification of sources of potential debris (Section 2); the potential generation of insulation debris by the effluences from a postulated LOCA (Section 3); the potential transport of the LOCA-generated debris to the containment sump (Section 4); the potential transport of debris within the sump pool to the recirculation sump screen (Section 5); the potential accumulation of the debris on the sump screen, specifically the uniformity and composition of the bed of debris (Section 6); and the potential head loss associated with the accumulated debris (Section 7). The report also summarizes the resolution options available to BWR plant licensees to resolve the BWR suction-strainer clogging issue and the advanced features of the new replacement strainers that were implemented in the BWR plants so that the strainers can accumulate the potential debris loading without the associated debris-bed head loss (Section 8). Domestic and foreign plant events relevant to the PWR sump-screen clogging issue are discussed (Section 9). Finally, an overall summary of the knowledge base is provided in Section 10.

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## ABBREVIATIONS

ABB	ABB Atom/Combustion Engineering
AJIT	Air-Jet Impact Testing
ANS	American Nuclear Society
ANSI	American National Standards Institute
ARL	Alden Research Laboratory
BWR	Boiling-Water Reactor
BWROG	Boiling Water Reactor Owners' Group
CCW	Component Cooling Water
CDF	Core-Damage Frequency
CDI	Continuum Dynamics Inc.
CE	Combustion Engineering
CEESI	Colorado Engineering Experiment Station, Inc.
CFD	Computational Fluid Dynamics
CFR	Code of Federal Regulations
CS	Containment Spray
CSNI	Committee on the Safety of Nuclear Installations
CSS	Containment Spray System
DBA	Design-Basis Accident
DB-LOCA	Design-Basis Loss-of-Coolant Accident
DDTS	Drywell Debris Transport Study
DEGB	Double-Ended Guillotine Break
DPSC	Diamond Power Specialty Company
ECCS	Emergency Core Cooling System
EOP	Emergency Operating Procedures
EPRI	Electric Power Research Institute
ESF	Engineered Safeguard Feature
FME	Foreign Material Exclusion
FSAR	Final Safety Analysis Report
GDC	General Design Criteria
GE	General Electric Nuclear Energy
GGNS	Grand Gulf Nuclear Station
GL	Generic Letter
GSI	Generic Safety Issue
HDFG	High-Density Fiberglass
HDR	Heisdampfreaktor
HELB	High Energy Line Break
HEPA	High-Efficiency Particulate Air
HPSI	High-Pressure Safety Injection
IN	Information Notice
ITS	Innovative Technology Solutions, Inc.
IVO	Imatran Voima Oy
KKL	Kernkraftwerk, Liebstadt
KWU	Siemens AG Power Generation Group
LDFG	Low-Density Fiberglass
LOCA	Loss-of-Coolant Accident
LLOC	Large Loss-of-Coolant Accident
LPCI	Low-Pressure Coolant Injection
LPCS	Low-Pressure Core Spray
LPSI	Low-Pressure Safety Injection
LTP	Licensing Topical Report
LWR	Light-Water Reactor
MIJIT	Metallic Insulation Jet Impact Testing Facility
MLOCA	Medium Loss-of-Coolant Accident

MSL	Main Steam Line
MSLB	Main-Steam-Line Break
NDE	Non Destructive Evaluation
NEA	Nuclear Energy Agency
NEI	Nuclear Energy Institute
NPSH	Net Positive Suction Head
NRC	Nuclear Regulatory Commission
NRCB	NRC Bulletin
OECD	Organization for Economic Cooperation and Development
OPG	Ontario Power Generating
PCI	Performance Contracting Inc.
PIRT	Phenomena Identification and Ranking Table
PORV	Power-Operated Relief Valve
PVC	Polyvinyl Chloride
PWR	Pressurized-Water Reactor
RCP	Reactor Coolant Pump
RCS	Reactor Coolant System
RG	Regulatory Guide
RHR	Residual Heat Removal
RL	Recirculation Line
RLB	Recirculation-Line Break
RMI	Reflective Metal Insulation
RWST	Refueling Water Storage Tank
SAT	Spray Additive Tank
SEA	Science and Engineering Associates, Inc.
SER	Safety Evaluation Report
SI	Safety Injection
SKI	Statens Kärnkraftenspektion
SLOCA	Small Loss-of-Coolant Accident
SRP	Standard Review Plan
SRV	Safety Relief Valve
SSC	System, Structure, and Component
STUK	Finnish Centre for Radiation and Nuclear Safety
TPI	Transco Products, Inc.
TVO	Teollisuuden Voima Oy
UNM	University of New Mexico
URG	Utility Resolution Guidance
US	United States
USI	Unreviewed Safety Issue
ZOI	Zone of Influence

## UNITS CONVERSION TABLE

Convert From	Convert To	Multiply By
<b>Length</b>		
in.	m	0.02540
mil*	m	2.540E-5
ft	m	0.3048
<b>Area</b>		
in. <sup>2</sup>	m <sup>2</sup>	6.452E-4
ft <sup>2</sup>	m <sup>2</sup>	0.09290
<b>Volume</b>		
ft <sup>3</sup>	m <sup>3</sup>	0.02832
gal.	m <sup>3</sup>	0.003785
gpm	m <sup>3</sup> /s	6.308E-5
<b>Pressure</b>		
psi	Pa	6895
<b>Mass</b>		
lbm**	kg	0.4536
<b>Density</b>		
lbm/ft <sup>3</sup>	kg/m <sup>3</sup>	16.02
<b>Velocity</b>		
ft/s	m/s	0.3048
<b>Temperature</b>		
°F***	°C	0.5556

\* mil = one-thousandth of an inch

\*\* lbm is often simply given as lb

\*\*\* Subtract 32 before multiplying

## 1.0 INTRODUCTION

In the event of a loss-of-coolant accident (LOCA)<sup>1</sup> within the containment of a light-water reactor (LWR), piping thermal insulation and other materials in the vicinity of the break will be dislodged by the pipe break and the ensuing steam/water-jet impingement. A fraction of this fragmented and dislodged insulation and other materials, such as chips of paint, paint particulates, and concrete dust, will be transported to the containment floor by the steam/water flows induced by the break and by the containment sprays. Some of this debris will eventually be transported to and accumulate on the recirculation-sump suction screens in pressurized water reactor (PWR) containments or a pump suction strainer in boiling water reactor (BWR) containments. Debris accumulation on the sump screen or strainers could challenge the plant's capability to provide adequate, long-term cooling water to the emergency core cooling system (ECCS) and to the containment spray system (CSS) pumps.

As a result of the research on the BWR suction-strainer and PWR sump-screen clogging issues, a substantial base of knowledge has been amassed that covers all aspects of the issues, from the generation of debris to the head loss associated with a debris bed on a strainer or screen. This report describes the different analytical and experimental approaches that have been used to assess the various aspects of sump and strainer blockage and identifies the strengths, limitations, important parameters, and plant features and the appropriateness of the different approaches. The report also discusses significant U.S. Nuclear Regulatory Commission (NRC) regulatory actions regarding resolution of the issue. In essence, the report is designed to serve as a reference for plant-specific analyses with regard to whether the sump or strainer would perform its function without preventing the operation of the ECCS pumps.

This report is intended for use in resolving the PWR issue because the BWR issue had been resolved. Nevertheless, the report will serve the review of any additional analyses for BWR

plants, as well. A majority of the strainer blockage research to date was conducted specifically for the resolution of the BWR issue; however, most of this research is also directly applicable to the resolution of the PWR issue. Therefore, both BWR and PWR research and analytical approaches are discussed, and the applicability of that research, i.e., BWR vs PWR, is stated.

The following background information is presented as preparation to understanding the discussions of the current state of knowledge in the succeeding sections.

- A brief historical overview of the resolution of the BWR issue with a lead into the PWR issue
- A description of the safety concerns relative to PWR reactors
- Criteria for evaluating sump failure
- Descriptions of postulated PWR accidents
- Relevant plant features that influence accident progression
- The regulatory considerations

### 1.1 Historical Overview

In January 1979, the NRC originally declared sump-screen blockage to be an Unresolved Safety Issue, USI A-43,<sup>1-1</sup> titled "Containment Emergency Sump Performance" and published the concerns identified in the USI in NUREG-0510, "Identification of Unresolved Safety Issues Relating to Nuclear Power Plants."<sup>1-2</sup> USI A-43 dealt with concerns regarding the availability of adequate long-term recirculation cooling water following a LOCA. This cooling water must be sufficiently free of debris so that pump performance is not impaired and long-term recirculation flow capability is not degraded.

Although USI A-43 was derived principally from concerns regarding PWR containment emergency sump performance, these concerns applied to BWR ECCS suction, as well. The BWR residual heat removal (RHR) system performs the low-pressure coolant injection (LPCI) function of the ECCS and the safety-related CSS. In addition, BWR designs incorporate a low-pressure core spray (LPCS) system as part of the ECCS. The suction

<sup>1</sup> The focus of this safety issue is on LOCAs, but the issue may also apply to other high-energy line breaks (HELBs) within the design basis that would require long-term recirculation cooling.

strainers located in the BWR suppression pool are analogous to the PWR sump debris screen.

Substantial experimental and analytical research was conducted to support the resolution of USI A-43. In 1985, the regulatory analysis results and the technical findings of research related to resolving USI A-43 were reported in NUREG-0869<sup>1-3</sup> and NUREG-0897,<sup>1-4</sup> respectively. The bases for these findings were documented in a series of NRC contractor reports, which are listed in the NUREG-0897 reference section.<sup>1-4</sup> In NUREG-0897,<sup>1-4</sup> the NRC concluded the following.

- The formation of an air-core vortex that would result in unacceptable levels of air ingestion that potentially could severely degrade pump performance was a concern. This concern was more applicable to PWRs but was still relevant to BWRs. Hydraulic tests showed that the potential for air ingestion was less severe than previously hypothesized. In addition, under normal flow conditions and in the absence of cavitation effects, pump performance is only slightly degraded when air ingestion is less than 2%.
- The effects of LOCA-generated insulation debris on RHR recirculation requirements depend on:
  1. the types and quantities of insulation,
  2. the potential of a high-pressure break to severely damage large quantities of insulation,
  3. the transport of debris to the sump screen or strainer,
  4. the blockage potential of the transported debris, and
  5. the impact on available net positive suction head (NPSH).
- The effects of debris blockage on the NPSH margin must be dealt with on a plant-specific basis. Insulation debris transport tests showed that severely damaged or fragmented insulation readily transported at relatively low velocities (0.2 to 0.5 ft/s). Therefore, the level of damage near the postulated break location became a dominant consideration. The level of damage to insulation was correlated with distance between the insulation and the break, in terms of L/Ds (distance divided by the pipe-break diameter). Data showed that jet load pressures would inflict severe damage to insulation within 3 L/Ds, and

substantial damage in the 3- to 5-L/D range with damage occurring out to about 7 L/D.

- The types and quantities of debris small enough to pass through screens or suction strainers and reach the pump impeller should not impair long-term hydraulic performance. In pumps with mechanical shaft seals, debris could cause clogging or excessive wear, leading to increased seal leakage. However, catastrophic failure of a shaft seal as a result of debris ingestion was considered unlikely. If the seal did fail, pump leakage would be restricted.
- Nineteen nuclear power plants were surveyed in 1982 to identify the insulation types used, the quantities and distribution of insulation, the methods of attachment, the components and piping insulated, the variability of plant layouts, and the sump designs and locations. The types of insulation found were categorized into two major groups: reflective metallic insulation (RMI) and fibrous insulations. The RMI was manufactured by at least four different manufacturers. The fibrous insulation included NUKON™ fiberglass blankets, fiberglass molded blocks, mineral wool fiber blocks, calcium-silicate molded blocks, and expanded perlite-molded blocks. Insulations sometimes were enclosed in an outer shell or jacket or cloth cover.

USI A-43 was declared resolved in 1985. The NRC resolution of USI A-43 was presented to the Commission in October 1985.<sup>1-5</sup> The resolution consisted of:

1. publishing NUREG-0897<sup>1-4</sup> as a summary of the key technical findings for use as an information source by applicants, licensees, and the staff;
2. revising the Standard Review Plan (SRP), Section 6.2.2,<sup>1-6</sup> and Regulatory Guide (RG) 1.82,<sup>1-7</sup> "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident," to reflect the staff's technical findings; and
3. issuing Generic Letter (GL) 85-22,<sup>1-33</sup> "Potential for Loss of Post-LOCA Recirculation Capability Due to Insulation Debris Blockage," to all holders of an operating license or construction permit outlining safety concerns and recommending the use of Regulatory Guide (RG) 1.82, Revision 1<sup>1-7</sup> as guidance for

conducting 10 Code of Federal Regulations (CFR) 50.59 analyses.<sup>1-8</sup>

In addition, a regulatory analysis was performed (see NUREG-0869<sup>1-3</sup>) to serve as a basis for the final resolution of USI A-43.

The regulatory analysis did not support a generic backfit action because plant-specific design features and post-LOCA recirculation flow requirements govern debris blockage effects. As a result, the analysis conclusion was that the issue must be resolved on a plant-specific basis. The staff recommended that RG 1.82, Revision 1,<sup>1-7</sup> be used as guidance for the evaluation (10 CFR 50.59)<sup>1-8</sup> of plant modifications involving replacement and/or modification of thermal insulation installed on the primary coolant system piping and components. The 50% blockage criterion of Revision 0 of RG 1.82<sup>1-7</sup> was considered inadequate to address this issue.

After the closure of USI A-43,<sup>1-1</sup> several ECCS strainer and foreign material discovery events prompted a review of the strainer blockage issue for BWRs. (These events are described in more detail in Section 9.) Perhaps the most notable of these events occurred on July 28, 1992, during the startup of Barsebäck, Unit 2, in Sweden. This is discussed in NRC Information Notice (IN) 92-71, "Partial Blockage of Suppression Pool Strainers at a Foreign BWR," September 30, 1992.<sup>1-9</sup> In this event, a spurious opening of a safety valve while the reactor was pressurized discharged steam into the drywell, dislodging mineral wool insulation that subsequently transported to the suppression pool, resulting in suction-strainer blockage and pump cavitation. The Barsebäck-2 event demonstrated that larger quantities of fibrous debris could reach the strainers than had been predicted by models and analysis methods developed for the resolution of USI A-43.<sup>1-1</sup>

ECCS suction-strainer clogging events also occurred at U.S. plants. These included the following.

- Two events (1992 and 1993) occurred at the Mark III Perry Nuclear Power Plant.<sup>1-10</sup> Debris was found on the suppression pool floor and on the RHR suction strainers during a refueling outage inspection. In addition, the buildup of debris on the strainer caused an excessive differential pressure,

which deformed the strainers. After the damaged strainers were replaced and the suppression pool was cleaned, the strainers were again found to be fouled by debris such that the pump suction pressure dropped to 0 during a test. The debris consisted of glass fibers, corrosion products, and other materials. Fibrous material acted as a filter for suspended particles—a phenomenon not previously recognized by either the NRC or industry.

- An event occurred at Limerick Generating Station Unit 1 in 1995<sup>1-11</sup> in which a safety relief valve (SRV) opened while Unit 1 was at 100% power. Subsequently, a thin mat of fibrous material and sludge covering the RHR pump suction strainers in the suppression pool caused fluctuating motor current and flow, indicating pump cavitation was occurring. Limerick subsequently removed about 635 kg of debris from the pool.
- In 1988 and 1989, the Grand Gulf Nuclear Station experienced strainer blockage events during testing of the RHR pumps. Pump suction pressures fell below the in-service inspection acceptance criteria.<sup>1-10</sup>
- In 1994, divers discovered numerous pieces of cloth-like material on the bottom of the torus and on the ECCS strainers at Browns Ferry Nuclear Plant Unit 2.<sup>1-12</sup> This debris had partially blocked the strainers.

Substantial quantities of debris were discovered in suppression pools on other occasions. In other cases, plant inspections have found deteriorated insulation that would render these materials more likely to form debris following a LOCA. In other plant inspections, previously unidentified unqualified coatings that could form debris following a LOCA have been found.

All of these events occurred despite existing NRC regulations and regulatory guidance. Foreign materials, degraded coatings inside the containment that detach from their substrate, ECCS components not consistent with their design basis, and LOCA-generated debris are potential common-cause failure mechanisms for the ECCS and containment spray system (CSS). Debris may clog suction strainers, sump screens, filters, nozzles, and small-clearance flow paths in the ECCS and safety-related CSS and interfere with the long-term cooling function, source-term reduction and/or pressure-reduction capabilities of the plant. The NRC has

consistently emphasized the need to minimize the presence of foreign material in the containment [e.g., a strong foreign material exclusion (FME) program].

The string of operational events described above demonstrated that

- larger quantities of debris could reach the ECCS strainers than had been predicted by models and analysis methods developed during the resolution of USI A-43;<sup>1-1</sup>
- fibrous material acts as a filter for suspended particles, a phenomenon not previously recognized by the NRC or industry;
- head loss correlations developed during the resolution of USI A-43<sup>1-1</sup> under-predicted strainer head losses for combined fiber/particulate debris beds; and
- Extensive quantities of foreign materials were being found in suppression pools despite ongoing FME programs.

The ECCS strainer and foreign material discovery events prompted a review of the strainer blockage issue; hence, the NRC sponsored research to estimate possible shortcomings of existing suction strainer designs in U.S. BWR plants and to evaluate the actions taken by the nuclear power industry to ensure the availability of long-term recirculation of cooling water in BWR plants.

Concerns generated by these strainer-blockage events prompted the NRC to issue Bulletin 93-02,<sup>1-13</sup> "Debris Plugging of Emergency Core Cooling Suction Strainers," on May 11, 1993, to both BWR and PWR licensees. Licensees were requested to:

- identify fibrous air filters and other temporary sources of fibrous material in the primary containment not designed to withstand a LOCA,
- take prompt action to remove the identified material, and
- take any other immediate compensatory measures necessary to ensure the functional capability of the ECCS.

The NRC sponsored research to evaluate the adequacy of existing suction strainer designs in U.S. BWR plants by initiating a detailed plant-specific study in September 1993 using a

reference BWR/4 reactor with a Mark I containment. The results were published in NUREG/CR-6224<sup>1-14</sup> in 1995. This plant-specific analysis developed analytical models applicable to the reference BWR that considered debris generation, drywell debris transport, suppression-pool debris transport, and strainer blockage. The NUREG/CR-6224 study identified a lack of critical data needed to complete the study.<sup>1-14</sup> As a result, the NRC sponsored a series of small-scale experiments designed to gain insights into the behavior of debris in the suppression pool and acquire mixed debris bed head loss data. A computer program called BLOCKAGE was developed to calculate debris generation, debris transport, fiber/particulate debris bed head losses and the effect of the debris on the available ECC NPSH.<sup>1-15,1-16</sup> Probabilistic analyses were performed that focused on evaluating the likelihood of ECCS strainer blockage and blockage-related core damage from large loss of coolant accident (LLOCA) initiators. The final results of the reference plant study, which is documented in NUREG/CR-6224,<sup>1-14</sup> demonstrated that for the reference plant, there was a high probability that the available NPSH margin for the ECCS pumps would be inadequate if insulation and other debris caused by a LOCA transported to the suction strainers. In addition, the study calculated that the loss of NPSH could occur quickly (less than 10 min into the event). The study also concluded that determining the adequacy of the NPSH margin for a given ECCS system is highly plant-specific because of the large variations in such plant characteristics as containment type, ECCS flow rates, insulation types, plant layout, plant cleanliness, and available NPSH margin.

The NRC also exchanged information and experience with the international community. The Swedish nuclear power inspectorate, Statens Kärnkraftinspektion (SKI), hosted a workshop to study the strainer blockage issue in 1994. The workshop revealed a confusing picture of the available knowledge base, including examples of conflicting information and a variety of interpretations of the regulatory guidance in the NRC's RG 1.82, Rev. 1.<sup>1-7</sup> Following this workshop, SKI requested the formation of an international working group to establish an internationally agreed-upon knowledge base for assessing the reliability of emergency core cooling water recirculation systems. The NRC compiled a source book of

available knowledge for the CSNI of the Organization for Economic Cooperation and Development (OECD) Nuclear Energy Agency.<sup>1-17</sup>

Based on the NRC's preliminary research and information learned at the OECD/Nuclear Energy Agency (NEA) workshop, the NRC issued Supplement 1 to Bulletin 93-02 on February 18, 1994, requesting BWR licensees to take further interim actions pending final resolution.<sup>1-13</sup> These actions involved implementing operating procedures and conducting training and briefings designed to enhance the capability to prevent or mitigate loss of ECCS following a LOCA as a result of strainer clogging. The purpose of these interim actions was to ensure the reliability of the ECCS so that the staff and industry would have sufficient time to develop a permanent resolution.

To provide time to conduct research to resolve the strainer clogging issue, the NRC first ensured that public health and safety were protected adequately. In responding to NRC Bulletin 93-02<sup>1-13</sup> and its supplement, BWR licensees implemented interim measures to ensure adequate protection of public health and safety. Specifically, licensees ensured that:

1. alternate water sources (both safety- and non-safety-related sources) to mitigate a strainer clogging event were available,
2. emergency operating procedures (EOPs) provided adequate guidance on mitigating a strainer-clogging event,
3. operators were trained adequately to mitigate a strainer-clogging event, and
4. loose and temporary fibrous materials stored in the containment were removed.

The responses to NRC Bulletin 93-02<sup>1-13</sup> showed that most suppression pools had already been cleaned recently and that those licensees who had not cleaned their suppression pools recently were scheduled to do so during their next refueling outage. In addition, a generic safety assessment conducted by the Boiling Water Reactor Owners' Group (BWROG) concluded that operators would have adequate time to make use of alternate water sources (25-35 min) if needed during a LOCA and that the probability of the initiating event is low. For these reasons, the NRC allowed continued operation by BWR licensees until the final

resolution to the strainer clogging issue was developed and implemented. The NRC initiated the final resolution to the strainer issue with the issuance of NRC Bulletin 96-03.<sup>1-18</sup> Satisfactory implementation of the requested actions in NRC Bulletin 96-03 ensured that the ECCS can perform its safety function and minimize the need for operator action to mitigate a LOCA.

The NRC issued RG 1.82, Revision 2, in May 1996.<sup>1-7</sup> This regulatory guide describes acceptable methods for implementing applicable design requirements for sumps and suppression pools functioning as water sources for emergency core cooling, containment heat removal, or containment atmosphere cleanup. In addition, guidelines for evaluating the adequacy of the sump and suppression pool for long-term recirculation cooling following a LOCA are provided. This regulatory guide was revised to update the BWR debris-blockage evaluation guidance because operational events, analyses, and research work that have occurred since the issuance of Revision 1 indicated that the previous guidance was not comprehensive enough to evaluate a BWR plant's susceptibility to the detrimental effects caused by suction-strainer debris blockage adequately.

An essential aspect of predicting the potential for strainer clogging is estimating the amount of debris that is likely to transport from the drywell into the wetwell. The transport processes are complex in that they involve transport during both the reactor blowdown phase (i.e., entrainment in steam/gas flows) and the post-blowdown phase (i.e., via water flowing out of the break and/or containment sprays). In Revision 2 of RG 1.82,<sup>1-7</sup> the NRC recommended assuming 100% debris transport unless analyses or experiments justified lower transport fractions. To facilitate a better understanding of debris transport, the NRC initiated a study in September 1996, referred to as the drywell debris transport study (DDTS), to investigate debris transport in BWR drywells using a bounding analysis approach. The focus of the DDTS was to provide a description of the important phenomena and plant features that control and/or dominate debris transport and the relative importance of each phenomenon as a function of the debris size. The results of the DDTS, which are documented in NUREG/CR-6369,<sup>1-19</sup> provide reasonable engineering insights that can be used to evaluate the

adequacy of the debris-transport factors used in plant-specific strainer-blockage analyses.

The NRC staff issued NRC Bulletin 96-03,<sup>1-18</sup> "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," on May 6, 1996. All BWR licensees were requested to implement appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA. The staff had identified three potential resolution options but allowed licensees to propose others that provided an equivalent level of assurance. The three options identified by the staff were to install:

1. a large-capacity passive strainer designed with sufficient capacity to ensure that debris loadings equivalent to a scenario calculated in accordance with Section C.2.2 of RG 1.82, Revision 2<sup>1-7</sup> do not cause a loss of NPSH for the ECCS;
2. a self-cleaning strainer that automatically prevents strainer clogging by providing continuous cleaning of the strainer surface with a scraper blade or brush; and
3. a backflush system that relies on operator action to remove debris from the surface of the strainer to prevent it from clogging.

All licensees were requested to implement these actions by the end of the first refueling outage starting after January 1, 1997.

The staff closely followed the BWROG's efforts to resolve this issue. The BWROG evaluated several potential solutions, and completed testing on three new strainer designs: two passive designs and one self-cleaning design. The BWROG effort was consistent with the options proposed in NRCB 96-03<sup>1-18</sup> for resolution of the potential ECCS strainer clogging issue. The BWROG then developed topical report NEDO-32686,<sup>1-20</sup> "Utility Resolution Guidance for ECCS Suction Strainer Blockage," November 1996 [the Utility Resolution Guidance (URG)], to provide utilities with:

1. guidance on evaluation of the potential ECCS strainer clogging issue for their plant;
2. a technically sound, standard industry approach to resolution of the issue; and
3. guidance that is consistent with the requested actions in NRCB 96-03<sup>1-18</sup> for

demonstrating compliance with 10 CFR 50.46.<sup>1-8</sup>

The URG includes guidance on calculational methodologies for performing plant-specific evaluations. The BWROG and the industry conducted several small-scale tests to obtain the data needed to develop the URG and to qualify plant-specific strainer designs. The URG included substantial portions of these data.

The NRC reviewed the URG and issued its Safety Evaluation Report (SER) on August 20, 1998.<sup>1-21</sup> In the SER, the staff noted that the issue of potential strainer blockage is complex in that head loss across suction strainers is not only a function of the amount of debris but also of the types of debris (e.g., fibrous insulation, paint, reflective metallic insulation, dirt, corrosion products, etc.) and characteristics of the debris (size, shape, etc.). The analyst must evaluate the worst case for potential strainer debris loadings; consider the potential for foreign material to be introduced during normal plant evolutions such as refueling and maintenance outages; and evaluate maintenance practices, including the maintenance of qualified coatings in the drywell and wetwell.

The staff found the URG to be comprehensive, providing general guidance on resolution options and detailed guidance on performing plant specific analyses to estimate potential worst-case debris loadings on ECCS suction strainers during a LOCA. However, the URG lacked complete guidance and/or adequate supporting analysis in several areas. Because insufficient detail and supporting justification on the "resolution options," were included in the URG, further supporting justification from a licensee or the BWROG was required for the staff to reach a conclusion on their acceptability.

The NRC staff issued GL 97-04, "Assurance of Sufficient Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal Pumps," to all holders of operating licenses for nuclear power plants on October 7, 1997.<sup>1-22</sup> The staff wanted to ensure that the NPSH available for ECCS and containment heat-removal pumps would be adequate under all design-basis accident (DBA) scenarios. The staff was concerned that changes to plant configuration, operating procedures, environmental conditions, or other operating parameters over the life of the plant could result

in inadequate NPSH. Some licensees discovered that they needed to have their licensing basis include credit for containment overpressure to meet the NPSH requirements of the ECCS and containment heat-removal pumps. Some licensees were assuming containment overpressure credit inconsistent with the plant's licensing basis. GL 97-04 requested addressees to provide current information regarding their NPSH analyses.

The staff evaluated its position on the use of containment overpressure in calculating NPSH margin as part of its review of industry responses to GL 97-04.<sup>1-22</sup> The concerns that led to the issuance of GL 97-04 illustrated an existing uncertainty and variability in the application of the methods used to calculate the NPSH margin. These concerns were confirmed by the review of the industry submittals.<sup>1-23</sup> Crediting containment overpressure in the NPSH margin requires supporting analyses. "Overpressure analyses" are detailed and comprehensive analyses performed to conservatively predict the minimum containment pressure available during a DBA. All means of removing heat from the containment are considered, including all installed pressure-reducing systems and processes. These systems and processes include heat transfer to structures, containment leakage, containment sprays, pool-surface heat and mass transfer, fan coolers, RHR heat exchangers, and power conversion systems. Because the NPSH is strongly dependent on the accident scenario, a comprehensive range of accident scenarios is evaluated to ensure that the minimum pressure is determined conservatively for the purpose of granting an overpressure credit. Because there is substantial uncertainty associated with the strainer clogging issue, the staff did not recommend licensing basis changes as a "resolution option."

The NRC issued GL 98-04,<sup>1-24</sup> "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," on July 14, 1998, to all holders of operating licenses for operating nuclear power reactors. GL 98-04<sup>1-24</sup> alerted addressees of additional strainer-blockage concerns, including problems associated with:

1. the material condition of Service Level 1 protective coatings inside the containment,
2. foreign material found inside operating nuclear power plant containments, and
3. design and construction deficiencies with the material condition of ECCS systems, structures, and components inside the containment.

The NRC expected addressees to ensure that the ECCS and the safety-related CSS remain capable of performing their intended safety functions.

The industry addressed the requirements of NRC Bulletin 96-03<sup>1-18</sup> by installing large capacity passive strainers in each plant (NRCB 96-03 Option 1) with sufficient capacity to ensure that debris loadings equivalent to a scenario calculated in accordance with Section C.2.2 of RG 1.82, Revision 2,<sup>1-7</sup> do not cause a loss of NPSH for the ECCS. Four BWR plants were chosen for detailed audits by the NRC staff: Limerick (BWR/4 Mark II), Dresden (BWR/3 Mark I), Duane Arnold (BWR/4 Mark I), and Grand Gulf (BWR/6 Mark III).

The research and regulatory developments associated with the resolution of the strainer-blockage issue for the U.S. BWR plants were summarized in Los Alamos National Laboratory report LA-UR-01-1595.<sup>1-25</sup> This report contains a more thorough history of events and developments than was just presented in this introduction. The report also includes brief summaries of the various experiments and analyses conducted to support the issue resolution.

As a result of research findings related to resolving the BWR ECCS strainer blockage safety issue, the NRC conducted further research into the PWR sump-screen blockage issue to determine if further action was needed beyond the original resolution of USI A-43.<sup>1-1</sup> The Generic Safety Issue (GSI)-191, "PWR Sump Blockage," study was established to determine if the transport and accumulation of debris in a containment following a LOCA would impede the operation of the ECCS in operating PWRs.

A parametric evaluation<sup>1-26</sup> was performed as part of the GSI-191 study to demonstrate the credibility of recirculation-sump clogging for operating PWRs. Each of the 69 domestic

PWRs was modeled in the evaluation using a mixture of generic and plant-specific data. The minimum amount of debris accumulation on the sump screen needed to exceed the required NPSH margin for the ECCS and CSS pumps was determined for each of the 69 representative models. Further, both completed and ongoing GSI-191 PWR research, as well as existing BWR research, were used to support the development of these models and the input to these models.<sup>1-28-1-29</sup> The evaluation considered small, medium, and large LOCAs using both favorable and unfavorable assumptions, relative to the plant, to a number of parameters. The results of the parametric evaluation formed a credible technical basis for making the determination that sump blockage was a credible concern.

A risk study that supported the parametric evaluation<sup>1-30</sup> was performed to estimate the amount by which the core damage frequency (CDF) would increase if failure of PWR ECCS recirculation cooling resulting from debris accumulation on the sump screen were accounted for in a manner that reflects the results of recent experimental and analytical work. Further, the estimate was made in a manner that reflected the total population of U.S. PWR plants. Results suggest that the conditional probability of recirculation sump failure, given a demand for recirculation cooling, is sufficiently high at many U.S. plants to cause an increase in the total CDF of an order of magnitude or more.

However, the parametric evaluation had a number of limitations; the most notable were attributed to the extremely limited plant-specific data available to the study. The need for more accurate plant-specific assessments of the adequacy of the recirculation function of the ECCS and CSS to be performed for each operating PWR was indicated clearly. The Nuclear Energy Institute (NEI) also recognized this need and has since initiated a program to develop evaluation guidance for the industry, a program being closely monitored by the NRC.

## 1.2 Description of Safety Concern

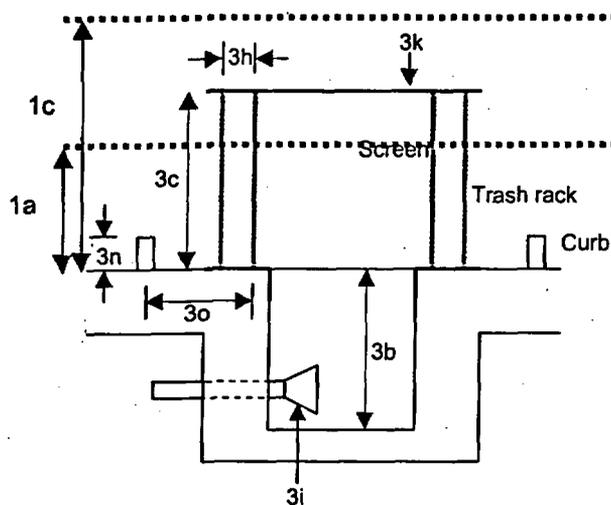
In the event of a LOCA within the containment of a PWR, piping thermal insulation and other materials in the vicinity of the break will be dislodged by break-jet impingement. A fraction of this fragmented and dislodged insulation and

other materials such as paint chips, paint particulates, and concrete dust will be transported to the containment floor by the steam/water flows induced by the break and the containment sprays. Some of this debris eventually will be transported to and accumulated on the recirculation sump suction screens. Debris accumulation on the sump screen may challenge the sump's capability to provide adequate, long-term cooling water to the ECCS and the containment spray (CS) pumps.

Generally speaking, the sump is the space enclosed by the trash rack; the space enclosed by the sump screen is referred to as the sump pit or sump region. Figure 1-1 illustrates the general features of a PWR sump layout generically; the parameters indicated were those queried of the industry during a survey conducted as part of the GSI-191 study.<sup>1-26</sup> Actual sump designs vary significantly from this figure, but all share similar geometric features. The purpose of the trash rack and sump screen is to prevent debris that may damage or clog components downstream of the sump from entering the ECCS and reactor coolant system (RCS). The area outside of the sump is referred to as the containment floor or pool.

An examination of plant drawings, preliminary analyses, and ongoing tests suggests that a prominent mechanism for recirculation sump failure involves pressure drop across the sump screen induced by debris accumulation. However, sump-screen failure through other mechanisms is also possible for some configurations. Three failure mechanisms were considered as part of the GSI-191 study.

1. Loss of NPSH margin caused by excess pressure drop across the screen resulting from debris buildup. This concern applies to all plant units having sump screens that are completely submerged in the containment pool in combination with other plant features that permit generation and accumulation of debris on the sump screen.
2. Loss of the static head necessary to drive recirculation flow through a screen because of excess pressure drop across the screen resulting from debris buildup. This concern applies to all plant units having sump screens that are not completely submerged in combination with other plant features that permit generation and accumulation of debris on the sump screen.



#### Symbol

3b	Sump depth
3c	Height above floor
3h	Distance between trash rack and screen
3i	Vortex suppressor
3k	Solid plate
3n	Debris curb height
3o	Distance between debris curb and screen
1a	Height of water pool on containment floor at time of switchover
1c	Max. Height of water pool on containment floor

Figure 1-1 Illustration of Sump Features and Parameters

3. Blockage of water-flow paths could (a) cause buildup (and retention) of water in some regions of the containment and result in lower water levels near the sump and thus a lower NPSH margin than estimated by the licensees, or (b) altogether prevent adequate water flow through these openings.

Realistically, an analysis of the likelihood of any of the above three recirculation-flow failure mechanisms required plant-specific data that only the licensee has in sufficient quantity to perform a definitive analysis. The parametric evaluation discussed in the preceding section<sup>26</sup> attempted to evaluate the likelihood, but those results were not definitive. Rather, the objective of that study, which was conducted using a mixture of generic and plant-specific data, was simply to demonstrate the credibility of recirculation-sump clogging for operating PWRs. For each of the 69 representative models, the minimum amount of debris accumulation on the sump screen needed to exceed the required NPSH margin for the ECCS and CSS pumps was determined and then compared with the potential for generating debris within the containment. The sump-clogging credibility was demonstrated effectively.

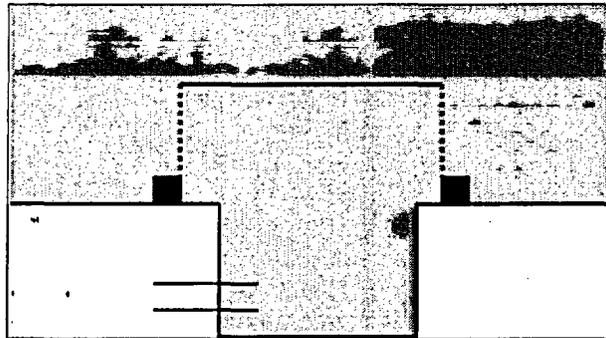
Other concerns related to debris generated during postulated accidents include:

- the potential for debris to pass through the sump screen, enter the RCS, and damage or block ECCS or RCS components and
- structural failure of the sump screens as a result of loads from debris or direct jet impingement.

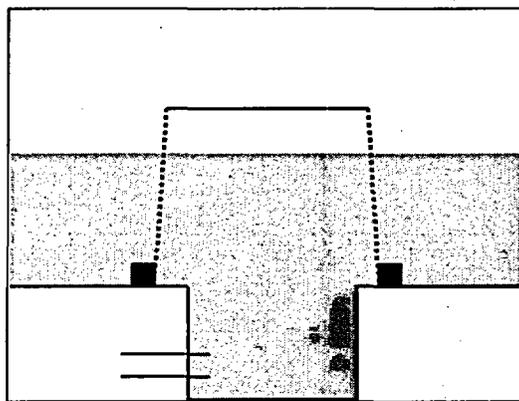
These concerns were considered beyond the scope of the GSI-191 study and the parametric evaluation.

### 1.3 Criteria for Evaluating Sump Failure

The sump-failure criterion applicable to each plant is determined primarily by sump submergence. Figure 1-2 illustrates the two basic sump configurations of fully and partially submerged screens. Although only vertical sump configurations are shown here, the same designations are applicable for inclined-screen designs. The key distinction between the fully and partially submerged configurations is that partially submerged screens allow equal pressure above both the pit and the pool, which are potentially separated by a debris bed. Fully submerged screens have a complete seal of water between the pump inlet and the containment atmosphere along all water paths passing through the sump screen. The effect of this difference in evaluation of the sump-failure criterion is described below.



(a) Fully submerged screen configuration showing solid water from pump inlet to containment atmosphere.



(b) Partially submerged screen configuration showing containment atmosphere over both the external pool and the internal sump pit with water on lower portion of screen.

**Figure 1-2 Sump-Screen Schematics**

### 1.3.1 Fully Submerged Sump Screens

Figure 1-2(a) is a schematic of a sump screen that is fully submerged at the time of switchover to ECCS from the injection phase to the recirculation phase. The most likely mode of failure for sumps in this configuration would be cavitation within the pump housing if the head loss caused by debris accumulation exceeds the NPSH margin. The NPSH margin is the excess in the available NPSH over that required by the pump per the manufacturer's specifications. The excess or margin is determined with the sump screens clean, i.e., no debris. The available NPSH is a function of the water level in the containment sump, the temperature of the sump water, the containment pressure, and the piping friction losses between sump and pump inlet. Because the NPSH margin is higher at the

maximum sump pool level than at the switchover pool level, the evaluation of sump blockage must consider the margin at the time of switchover. The accumulation of debris on the screen also would be transient; however, accurately determining the timing of debris accumulation on the screens would be a very difficult analysis. Conservatively, the head loss associated with the maximum accumulation of debris usually is compared with the minimum NPSH margin, which usually would occur at the time of switchover rather than the time of maximum debris loading.

### 1.3.2 Partially Submerged Sump Screens

Figure 1-2(b) is a schematic of a sump that is partially submerged at the time of switchover. Failure can occur for sumps in this configuration

in one of two ways: by pump cavitation as explained above or when head loss caused by debris buildup prevents sufficient water from entering the sump. As debris accumulates on the screen and causes a drop in pressure across it, the water level behind the screen would drop somewhat lower than the water level in front of the screen. In other words, this additional hydrostatic head resulting from the differing water levels compensates for the added head loss of the debris to maintain the volumetric demands of the pump, which remains relatively constant. Because the pit and the pool are at equal atmospheric overpressure, the only force available to move water through a debris bed is the static pressure head in the pool. After the pool level behind the screen drops to the bottom of the screen, the maximum hydrostatic pressure head will have been reached and the subsequent volumetric flow will decrease below the required pump flow, causing pump cavitation.

The effective maximum hydrostatic head loss actually would be less than the difference between the sump-pool level and the bottom of the sump screen. The pressure differential across the debris bed on the screen increases from 0 at the top of the debris bed to the maximum head at the bottom of the screen. Numeric simulations have confirmed that the effective maximum hydrostatic head loss across a debris bed is approximately equal to one-half of the height of the sump pool. To summarize, after the head loss across the sump screen resulting from debris accumulation exceeds the hydrostatic head corresponding to one-half the height of the sump pool, the volumetric flow to the pump decreases below the required flow to the pump and the pump will fail.

In some plants, the sump could be partially submerged at pump switchover but be totally submerged later as the sump reached its full level. This can occur for a number of reasons, including accumulation of CS water, continued melting of ice-condenser reservoirs, and continued addition of refueling water storage tank (RWST) inventory to the containment pool. As the pool depth changes during recirculation, the wetted or submerged area of the sump screens also would change. The depth of the pool also determines the average velocity of water approaching the screen, which, in turn, affects both debris transport to the screen and the pressure drop across the debris bed.

## 1.4 Description of Postulated Pressurized-Water Reactor Accidents

### 1.4.1 Overview

This section presents the results of thermal-hydraulic simulations performed to achieve three objectives.<sup>2</sup>

1. Identify important RCS and containment thermal-hydraulic parameters that influence the generation and/or transport of debris in PWR containments.
2. Determine time-dependent values for these parameters as a function of the assumed system's response (where applicable) by performing plant simulations using NRC-approved computer codes.
3. Use the calculated plant-response information to construct accident progression sequences that form the basis for strainer-blockage evaluations and probabilistic risk evaluations.

Evaluations were made for seven accident scenarios:

1. an LLOCA (cold- and hot-leg breaks),
2. a medium loss-of-coolant accident (MLOCA) (6-in. cold-leg break),
3. a small loss-of-coolant accident (SLOCA) (2-in. cold-leg break),
4. a small-small LOCA (1/4-in. cold-leg break),
5. a pressurizer surge line break,
6. a loss of offsite power with simultaneous failure of feedwater, and
7. inadvertent opening and stuck-open power-operated relief valve (PORV).

Figure 1-3 shows the major steps involved in the calculational effort. These include the following.

- RELAP5/MOD3.2<sup>1-31</sup> was used for simulating the RCS response to each of the postulated accident sequences. The RELAP5 simulations incorporated realistic initial and boundary conditions and a full representation of a Westinghouse four-loop RCS design. Selected simulations were also performed for Combustion Engineering (CE) plants.

<sup>2</sup> These results are documented in more detail in Ref. 1-27.

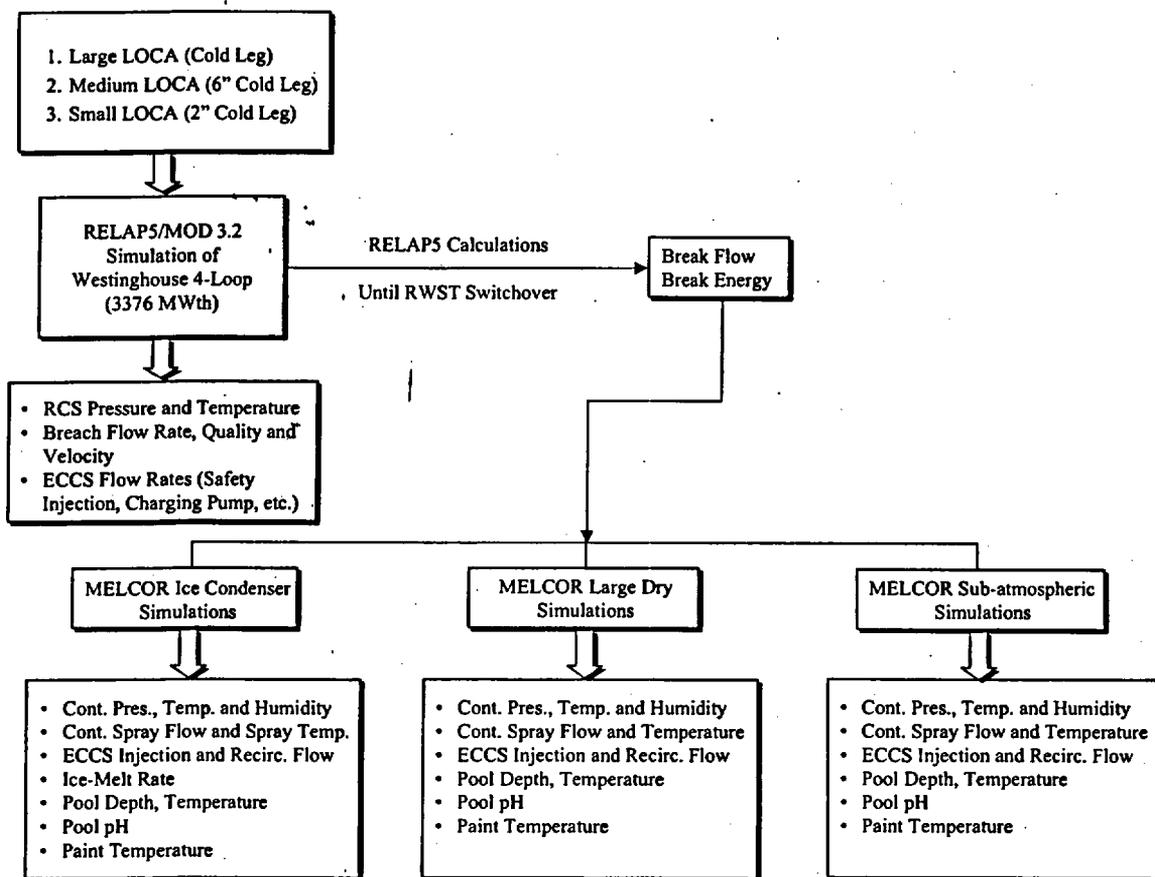


Figure 1-3 Flow Chart of Analysis Process

- MELCOR Version 1.8.2<sup>1-32</sup> was used for simulating the response of the ice condenser, large dry, and sub-atmospheric containments to a release of steam/water into the containment as a result of each accident sequence (as predicted by RELAP5).

The parameters tracked for each code simulation are shown in Figure 1-3. These parameters were limited to those that could influence debris generation and transport following a LOCA. A brief description of each of the important parameters and their potential effects is provided in Table 1-1.

Brief discussions of the simulation results are provided in Sections 1.4.2 through 1.4.4 for an LLOCA, an MLOCA, and an SLOCA, respectively. An examination of the data summarized in these sections reveals that

accident progression differs markedly with event type and containment type. The important differences are as follows.

1. *Time at which blowdown commences and the duration over which blowdown occurs varies considerably with accident type.* In one extreme, the RCS blowdown following an LLOCA commences immediately and terminates within 30 s. The stagnation pressure at the break plane over that time period varies between 2000 and 300 psia. On the other extreme, blowdown following the SLOCA occurs over the first hour of the transient; even after 1 h, it is possible that the pressure vessel remains at pressures as high as 500 psi. Debris-generation estimates must account for these differences, especially for those insulations for which generation is driven by erosion. It is possible that a small-break zone of

**Table 1-1 Important Parameters Tracked and Their Relevance**

**RCS PRESSURE AND TEMPERATURE:** The flow through an RCS breach would be choked as long as the RCS temperature (and hence pressure) remains elevated. The critical (choked) flow rate through the breach would depend strongly on upstream pressure and temperature, which define the thermodynamic state of the fluid. The state of the fluid largely determines the expansion characteristics of a two-phase flashing jet.

**BREACH FLOW CONDITIONS (FLOW RATE, VELOCITY, AND QUALITY):** The destructive potential of a break jet depends strongly on break flow conditions. The velocities of both phases (liquid and vapor) are important here. The values calculated are the velocities at the choke plane. The moisture content of the fluid exiting the breach influences the damage potential of the jet. The quantity calculated here is the ratio of vapor mass flow rate to total mass flow rate at the choke plane.

**ECCS SAFETY INJECTION FLOW:** The rates of ECCS safety injection determine when the inventory of the RWST would be depleted, requiring switchover to ECCS recirculation through the emergency sump. The timing of switchover is important with regard to debris settling opportunities. Flow patterns in the water pool formed on the floor of the containment would be influenced by injection rates. Injection rates determine accident progression as related to the rate at which the RCS is cooled down.

**ECCS RECIRCULATION FLOW:** The rate at which flow is recirculated through the emergency sump will determine the flow patterns, velocities, and turbulence levels in the containment pool. The potential for debris transport is governed by these traits.

**CONTAINMENT SPRAY FLOW:** Containment sprays have the potential to wash settled debris from containment structures and suspended debris from the containment atmosphere down to the containment pool. Whether the sprays are operating or not largely determines the time at which the RWST inventory is expended and the magnitude of the recirculation flow through the emergency sump. The flow patterns and turbulence levels in the containment pool may be affected by where and how the sprays drain.

The potential for containment sprays to influence debris transport is thought to be considerable. As such, it is important to note the large variability in spray activation logic that exists from plant to plant, e.g., containment high-high pressure set points. Additionally, actions taken by the operators to shut containment sprays down would influence debris transport.

**CONTAINMENT SPRAY TEMPERATURE:** In some plants, recirculated spray water passes through heat exchangers. The heat removal would influence containment pressure and temperature trends. This phenomenon is of particular interest in ice-condenser containments. Therefore, special emphasis was put on modeling RHR heat exchangers and determining spray temperatures as close to reality as possible.

**POOL DEPTH AND TEMPERATURE:** The available NPSH at the recirculation pumps depends on the depth of the containment pool and its temperature. The velocities, flow patterns, and turbulence levels (and hence debris transport potential) in the pool depend on pool depth.

**POOL PH:** Basic or acidic tendencies in recirculating water may change the corrosion, dissolution, or precipitation characteristics of metal or degraded metal-based paints in containment. A specific concern is the possible precipitation of ZnOH formed from chemical interaction between zinc (in the zinc-based paints) and water at high temperature. The dissolution/precipitation of ZnOH in water is influenced by the degree of boration.

**CONTAINMENT ATMOSPHERIC VELOCITY:** The atmospheric velocities generated in the containment in response to an RCS breach determine to what degree generated debris initially disperses within the containment. These are the velocities developed as containment is subjected to the shock and pressurizing effects of the flashing break jet.

**PAINT TEMPERATURE:** Sustained elevated temperatures may degrade containment paints. An elaborate paint representation model was included in the MELCOR input model.

influence (ZOI) may be characterized by a larger L/D compared with large or medium breaks.<sup>3</sup>

2. *The magnitude of the ECCS recirculation flow through the emergency sump varies between events.* In the case of an SLOCA, the maximum ECCS flow through the sump during recirculation corresponds to the make-up flow for the high-pressure safety injection (HPSI) and charging pump discharge into the RCS (at about 500 psi) and subsequently leaking into the containment through the breach. On the other hand, following a LLOCA or a MLOCA, the maximum ECCS flow approaches the design flow (which is approximately 11,000 gpm for the cases simulated). The implication is that the potential for debris transport would be higher following an LLOCA than for the SLOCA analyzed. The plant-specific estimates for ECCS recirculation flow for each case can be obtained as follows.

- A generic value<sup>4</sup> of 10,000 gpm (large break) could be used for most plants, or alternately, the plant response to NRC GL 97-04<sup>1-22</sup> may be used.
- A generic value of 2500 gpm (small break) could be used for most plants. A survey of plant data suggests that actual ECCS flow following a SLOCA could vary between 1800 gpm and 4800 gpm, with a median value of 2500 gpm (Ref. 1-26, Volume 2).

3. *A CS actuation is accident-specific and plant-specific.* In an accident where containment fan coolers sufficiently managed containment pressure and temperature to below the engineered safeguard feature (ESF) actuation set point, sprays would not actuate. If the sprays were not used or were used only sparingly, the

<sup>3</sup> The ZOI is defined as the zone within which the break jet would have sufficient energy to generate debris of transportable size and form. L/D is a unitless measure of the size of the ZOI, where L is the maximum linear distance from the location of the break to the outer boundary of the ZOI and D is the diameter of the broken pipe.

<sup>4</sup> The generic values presented here originally were developed for use in the parametric evaluation where plant-specific data were lacking. In plant-specific analyses, plant-specific values should be used where possible.

length of time that ECCS injection could draw from the RWST would be increased largely. This also would minimize the potential for debris washdown by the cascading spray water. Note that for SLOCA events, sprays were not required for large dry containments whose actuation set points are higher than 10 psi, thereby limiting the maximum flow expected through the sump. Sprays were required for the ice condenser containment, resulting in sump flow rates nearly 4 times that required for the large dry plants. Sprays also are required for many large dry plants (including, but not limited to, sub-atmospheric containments) whose actuation set points are equal to or lower than 10 psi.<sup>5</sup> This is because of the following:

- In several plants, the chilled water supply to the fan coolers is isolated following the LOCA, which reduces the efficiency of the fan coolers for removing containment heat. [The ultimate heat sink is via the component cooling water (CCW), which may not be sufficiently sized to handle such heat loads.]
- Degradations in fan coolers also may be possible if LOCA debris reaches or deposits on the fan cooler heat exchangers.
- Fan coolers are not safety-class equipment in most PWRs.<sup>6</sup> For those plants, it is not clear that such fan coolers can be relied on for pressure control for a variety of reasons ranging from the fact that their functionality is not tested for these conditions to the fact that the heat removal source for fan coolers may be isolated as a result of a hi-hi or hi containment pressure set point (differs from containment to containment). However, for plants with safety-class fan coolers, those coolers can be relied upon to cool the containment, e.g., the fan coolers at

<sup>5</sup> A SLOCA simulation was performed assuming fan coolers were not operational. The maximum containment pressure for this calculation was estimated to be approximately 18 psi, as opposed to 6 psi (see Table 1-7) for the case where fan coolers are assumed to operate.<sup>1-27</sup>

<sup>6</sup> In the thermal-hydraulic simulations discussed in this section, all plant systems including the fan coolers were assumed to operate as designed.

Combustion Engineering (CE) plants with safety related CCW and safety related power to low speed fans.

The plant estimates for CS recirculation flow for each plant can be obtained as follows.

- A generic value of 6000 gpm can be used for most PWRs or preferably one can use appropriate flow rates applicable to each plant. Individual plant flow is generally not significantly different and thus will not influence the accident outcome.

#### 1.4.2 Large Loss-of-Coolant Accident

The LLOCA simulated was a cold-leg, pump-discharge, double-ended guillotine break (DEGB). The RCS pressure and average temperature before the break were 2250 psia and 570°F. The cold-leg inside diameter was 27.5 in., corresponding to a cross-section area of 4.12 ft<sup>2</sup>. The break was assumed to be instantaneous with a discharge coefficient of unity. A cold-leg break was chosen as the LLOCA event because design-basis accidents typically are cold-leg breaks. With respect to debris generation and transport, any differences between a cold-leg and hot-leg break likely would be small. This is not the case for core response, but with respect to emergency sump blockage, differences between large hot-leg and large cold-leg breaks are probably negligible. This assumption is supported by the results (not presented here) of a supplementary RELAP5 large-hot-leg-break calculation that compares closely with the results of the large-cold-leg-break calculation with respect to break-flow characteristics.

The calculated results for the LLOCA events in large dry and ice condenser containments are provided in Tables 1-2 and 1-3, respectively.<sup>7</sup> These simulations were used to develop a generic description of LLOCA accident progression in a PWR, both in terms of the system's response and its implications on debris generation and transport. Table 1-4 provides a

<sup>7</sup>Large dry containment LLOCA results are representative of those expected for sub-atmospheric containments as well, with the exception that inside recirculation pump flow for the sub-atmospheric containment would have to be added.

general chronology of events for a PWR LLOCA sequence. Figure 1-4 summarizes key findings to supplement the tabulated results, with further explanation as follows.

##### 1.4.2.1 Reactor Coolant System Blowdown Phase

In this report, the RCS blowdown refers to the event (or process) by which elevated energy in the RCS inventory is vented to the containment as the RCS vents through the breach. Blowdown and the subsequent flashing<sup>8</sup> in the containment cause rapid decay in the RCS pressure and rapid buildup of containment pressure. Either of these initiates reactor scram.<sup>9</sup> With delay built-in, it is expected that reactor scram would occur within the first 2 s. It is during RCS blowdown that flow from the break occurs and the highest (and most destructive) energy is released. Therefore, debris generation by jet impingement would be greatest during this time. Also, debris could be displaced from the vicinity of the break as the flashing two-phase break jet expands into the containment. Large atmospheric velocities may develop in the containment, approaching 200 ft/s in the ice condenser containment and 300 ft/s in the large dry containment, as breach effluent quickly expands to all regions of the containment. In the vicinity of the breach, containment structures would be drenched by water flowing from it. Increase in containment pressure also causes immediate automatic actuation of containment sprays, for all plant types, condensing steam and washing structures throughout containment. Spray water drains over and down containment walls and equipment, carrying both insulation and particulate (e.g., dirt and dust) debris to a growing water pool on the containment floor. In most containments, NaOH liquid stored in the spray additive tank (SAT) will be added to the borated water to facilitate absorption of iodine that may be released to the containment. Therefore, a secondary CS effect is a potential

<sup>8</sup>Flashing refers to the phenomenon by which the mainly liquid inventory of the RCS turns into a steam and liquid mixture as it is expelled into the containment atmosphere, which is at a significantly lower pressure.

<sup>9</sup>The accident progression in sequences in which scram does not occur is significantly different and will not be discussed in this document.

Table 1-2 Debris Generation and Transport Parameters: LLOCA—Large Dry Containment									
Parameter	Blowdown Phase			Injection Phase			Recirculation Phase		
	0+	20 s	45 s	45 s	15 min	27 min	27 min	2 h	24 h
RCS pressure at break (psia)	2250	393	55						
RCS temperature at break (°F)	531	291	250	250	173	144	144		
Break flow (lb/s)	7.97e4	1.28e4	4.89e3						
Break flow velocity (ft/s)	296	930	100						
Break flow quality	0	0.25	0.3	0.3	0				
Safety injection (gpm)				11500	11500	11500			
Recirculation flow (gpm)							17500	11800	11800
Spray flow (gpm)				0	5700	5700	5700	0	
Spray temperature (°F)					105	190	190		
Containment pressure (psig)	0	36	33	33	11.5	7	7	1.5	0
Containment temperature (°F)	110	305	250	250	190	163	163	115	95
Pool depth (ft)					2	3.5	3.5	3.5	3.5
Pool temperature (°F)					212	187	187	125	100
Pool pH									
Containment atmosphere velocity (ft/s)	282		7						
Containment relative humidity (%)	50	100	100	100	100	90	90	100	100
Paint temperature (°F)	100			215	240	220	220	145	112
Peak break flow: 7.97e4 lb/s at 0+ s			Peak break flow velocity: 930 ft/s at 21 s						
Quality at peak break flow: 0			Quality at peak break flow velocity: 0.25						
Peak containment pressure: 36 psig at 20 s			Peak containment atmosphere velocity: 282 ft/s at 0+ s						

**Table 1-3 Debris Generation and Transport Parameters: LLOCA—Ice Condenser Containment**

Parameter	Blowdown Phase			Injection Phase			Recirculation Phase		
	0+	20 s	45 s	45 s	10 min	17 min	17 min	2 h	24 h
RCS pressure at break (psia)	2250	393	55						
RCS temperature at break (°F)	531	291	250	250	200	160	160		
Break flow (lb/s)	7.97e4	1.28e4	4.89e3						
Break flow velocity (ft/s)	296	930	100						
Break flow quality	0	0.25	0.3	0.3	0				
Safety injection (gpm)				11500	11500	11500			
Recirculation flow (gpm)							18000	18000	18000
Spray flow (gpm)				6400	6400	6400	6400	6400	6400
Spray temperature (°F)				105	105	97	97	95	89
Containment pressure (psig)	0+	14	10.1	10.1	4.5	4.5	4.5	3	2
Containment temperature (°F)	100	168	160	160	103	105	105	98	100
Pool depth (ft)				4	8.5	10.75	10.75	10.8	10.1
Pool temperature (°F)				180	157	159	159	148	126
Pool pH									
Containment atmosphere velocity (ft/s)	184	18	1						
Containment relative humidity (%)	0	50	100	100	80	96	96	97	98
Paint temperature (°F)	100	106	112	112	113	112	112	90	90
Peak break flow: 7.97e4 lb/s at 0+ s Quality at peak break flow: 0 Peak containment pressure: 14.4 psig at 15 s				Peak break flow velocity: 930 ft/s at 21 s Quality at peak break flow velocity: 0.25 Peak containment atmosphere velocity: 184 ft/s at 0+ s					

**Table 1-4 PWR LLOCA Sequences**

Time after LOCA (s)	Accum. (SI Tanks)	HPSI	LPSI	CS	Comments
0-1	Reactor scram. Initially high containment pressure. Followed by low pressure in the pressurizer. Debris generation commences caused by the initial pressure wave, followed by jet impingement. The blowdown flow rate is large. But mostly saturated water. Quality $\leq 0.05$ . Saturated jet-models are appropriate. SNL/ANSI Models suggest wider jets, but pressures decay rapidly with distance				
2		Initiation signal	Initiation signal	Initiation signal	Initiation signal from low pressurizer pressure or high containment pressure/temp
5	Accumulator injection begins	Pumps start to inject into vessel (bypass flow out)	Pumps start (RCS P > pump dead head)	Pump start and sprays on	In cold-leg break, ECCS bypass is caused by counter-current injection in the downcomer. Hot-leg does not have this problem.
10	The blowdown flow rate decreases steadily from $\approx 20,000$ lb/s to 5000 lb/s. Cold-leg pressure falls considerably to about 1000 psia. At the same time, effluent quality increases from 0.1 to 0.5 (especially that from steam generator side of the break). Flow is vapor continuum with water droplets suspended in it. Saturated water or steam jet-models are appropriate. At these conditions, SNL/ANSI models show that jet expansion induces high pressures far from the break location.				
25		End of bypass; HPSI injection			
25-30	Break velocity reaches a maximum > 1000 ft/s. Quality in excess of 0.6. Steam flow at less than 500 lb/s. Highly energetic blowdown is probably complete. However, blowdown continues as residual steam continues to be vented.				
35	Accumulators empty		Vessel LPSI ramps to design flow.		
40	Blowdown is terminated, and therefore, debris generation is complete. Blowdown pressure at the nozzle less than 150 psi. Debris would be distributed throughout the containment. Pool is somewhat turbulent. Height < 1 ft.				
55-200	Refeed and quenching of the fuel rods ( $T_{max}$ 1036 °F). In cold-leg break, quenching occurs between 125 and 150 s. In the case of hot-leg break, quenching occurs between 45 and 60 s ( $T_{max}$ 950 °F).				
200-1200	Debris added to lower containment pool by spray washdown drainage and break washdown. The containment floor keeps filling. No directionality to the flow. Heavy debris may settle down.				
1200	RWST low level indication received by the operator. Operator prepares to turn on ECCS in sump recirculation mode. Actual switchover when the RWST low-low level signal is received.				
1500		Switch suction to sump	Switch suction to sump	Terminate or to sump	Many plants have containment fan coolers for long-term cooling.
1500-18000	Debris may be brought to the sump screen. Buildup of debris on the sump screen may cause excessive head loss. Containment sprays may be terminated in large dry containments at the 2-h mark.				
>36000		Switch to hot-leg recirculation.	Switch to hot-leg recirculation		

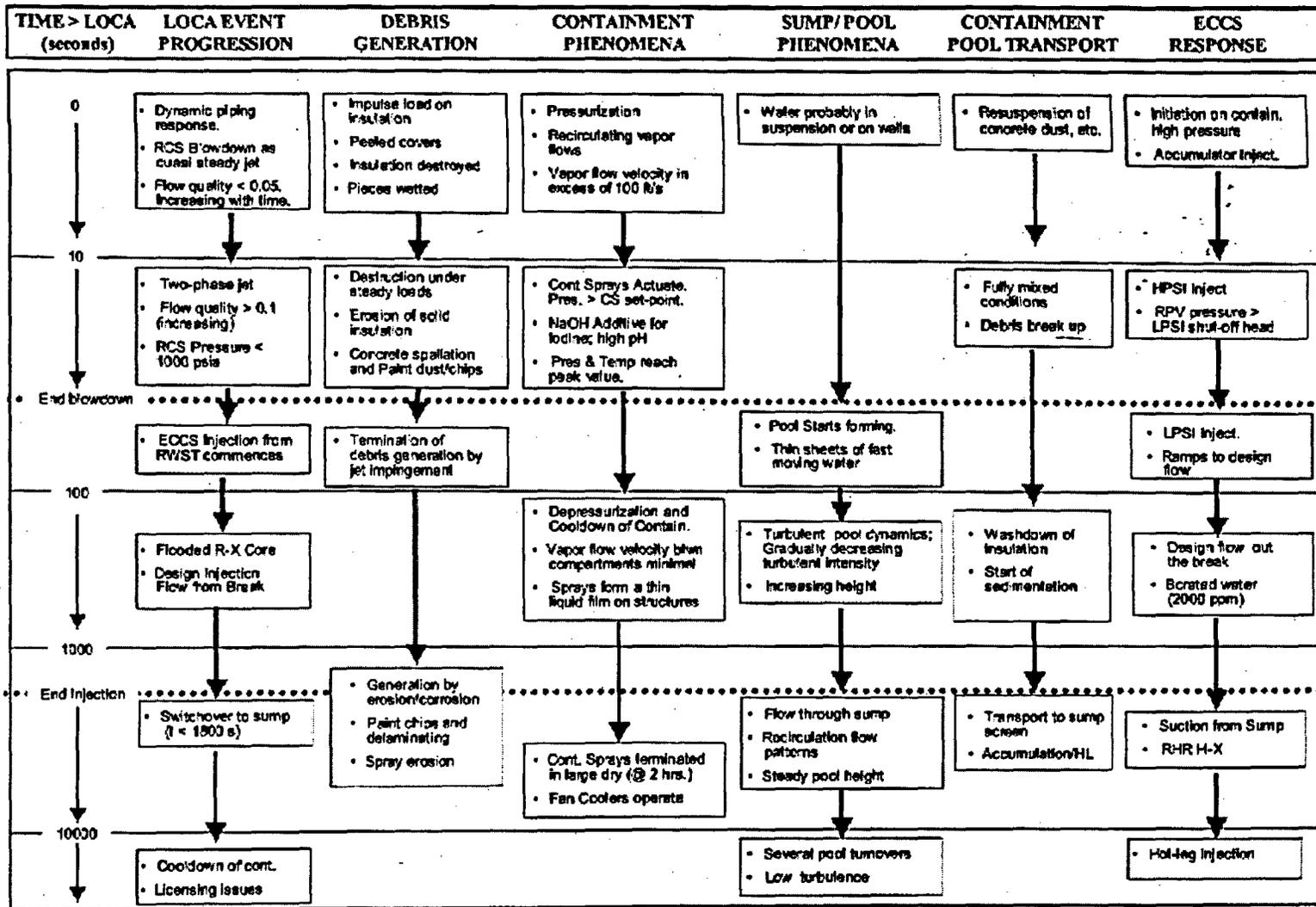


Figure 1-4 PWR LLOCA Accident Progression in a Large Dry Containment

increase in pool pH, which in turn, could play a role in particulate debris precipitation caused by the interaction of hot, borated, high-pH water with zinc and aluminum surfaces. The rates of these reactions are used in many Final Safety Analysis Reports (FSARs) to estimate the hydrogen source term and evaluate the potential for hydrogen accumulation in the containment.

Accurate characterizations of conditions that exist during the blowdown phase are important for estimating debris generation and, to some degree, debris transport. For LLOCA events, RCS blowdown occurs over a period of approximately 30 s, during which vessel pressure goes from 2250 psia to near containment pressure. During this time, the reactor pressure vessel thermodynamic conditions undergo a rapid change. Initially, the break flow is subcooled at the break plane and flashes as it expands into the containment. Within 2 s, the vessel pressure drops below 2000 psi and the flow in the pipes and the vessel becomes saturated. Thereafter, the break flow quality is equal to or higher than 10%. On the other hand, the void fraction increases to approximately 1.0, clearly indicating that the water content would be dispersed in the vapor continuum in the form of small droplets. The corresponding flow velocity at the break plane reaches a maximum of about 930 ft/s. This clearly indicates that jets would reach supersonic conditions during their expansion upon exiting the break. Based on these simulations, the energetic blowdown terminates within 25–30 s as the vessel pressure decreases to near 150 psig. Although steam at high velocities continues to exit, the stagnation pressure is not sufficient to induce very high pressures at distances far from the break. Thus, it is reasonable to assume that debris generation following an LLOCA occurs within the first minute. (Note: Debris generation by non-jet-related phenomena may occur over a prolonged period of time as a result of high temperature, humidity, and sprays.) The RCS blowdown continues until the vessel pressure falls below the shut-off head for the accumulator tank,<sup>10</sup> the HPSI, and the low-pressure safety injection (LPSI). This causes increasingly large quantities of cooler, borated RWST water to quench the core and terminate blowdown.

<sup>10</sup>The accumulators are also known as safety injection tanks in some designs.

#### 1.4.2.2 Emergency Core Cooling System Injection Phase

The injection phase refers to the period during which the RCS relies on safety injection, drawing on the RWST for decay heat removal. In the case of an LLOCA, the injection phase immediately succeeds the initial RCS blowdown. During this phase, core reflood is accomplished and quasi-steady conditions are arrived at in the reactor, where decay heat is removed continually by injection flow. In ice condenser containments, the ice condenser compartment doors open and the recirculation fans move the containment atmosphere through the ice condensers. Opportunities would exist for debris to settle in the pool during this relatively quiescent time before ECCS recirculation. Containment pressure would decrease from its maximum value (reached in the blowdown phase). The injection phase is considered to be over when the RWST inventory is expended and switchover to sump recirculation is initiated.

Accurate characterization of conditions that exist during injection phase may be important for estimating the quantity of debris transported from the upper containment to the pool and for estimating the quantity of debris that may remain in suspension. Following the initial break, safety injection (SI) begins immediately with the combined operation of the accumulators, the charging pumps, the HPSI pumps, and the LPSI (RHR) pumps. The SI flow approaches the design value (which is 11,500 gpm in the plant simulated) in about a minute and continues at that rate until switchover. Current simulations did not take credit for potential reduction in the injection flow (e.g., system-failure scenarios). Containment sprays continue to operate; spray water and water exiting the break will cause washdown of debris from the upper portions of the containment to the pool on the containment floor.

It has been determined that large quantities of water would be introduced into the containment within a few minutes following an LLOCA. As a result, the water-pool depth on the containment floor increases steadily. In the case of a large dry containment, the peak pool height is reached at the end of the injection phase; in an ice-condenser containment, the peak value is reached several hours into the accident after all the ice has melted.

### 1.4.2.3 Recirculation Phase

After the RWST inventory is expended, the ECCS pumps would be realigned to take suction from the emergency sump in the containment floor. This would begin the ECCS recirculation phase, in which water would be pulled from the containment pool, passed through heat exchangers, and delivered to the RCS, where it would pick up decay heat from the reactor core, flow out the breach, and return to the containment pool. Pool depth would reach a steady state during the recirculation phase, and containment pressure and temperature would be decreasing gradually. It would be during this accident phase that the potential would exist for debris resulting from an RCS breach (or residing in containment beforehand) to continue to be transported to the containment emergency sump. Because of the suction from the sump, this pool debris may accumulate on the sump screens, restrict flow, and either reduce available NPSH or starve the ECCS recirculation pumps.

The primary observation regarding the RCS and containment conditions during the recirculation phase is that the sump flow rate reaches the design capacity of all the pumps, which in the plants analyzed is 17,500 gpm for the large dry and sub-atmospheric containments and 18,000 gpm for the ice condenser containment.

### 1.4.3 Medium Loss-of-Coolant Accident

The MLOCA simulated was 6-in. in diameter circular hole, corresponding to a cross-section area of 0.1963-ft<sup>2</sup>, in a cold leg downstream of the reactor coolant pump (RCP). The hole became full-sized instantaneously. It was situated on the side of the cold leg and centered halfway up. A discharge coefficient of unity was used, which made these simulations very conservative. The cold-leg location of the hole was chosen arbitrarily and is not expected to be a determining factor in the simulation results.

The calculated results for the MLOCA events in large dry and ice condenser containments are provided in Tables 1-5 and 1-6, respectively. Figure 1-5 presents the time scales associated with the occurrence of some of the events. The following sections highlight the differences between the MLOCA event and the LLOCA event described above.

### 1.4.3.1 Reactor Coolant System Blowdown Phase

In the case of an MLOCA, RCS blowdown occurs over a prolonged period (3 min) compared with that in an LLOCA. Blowdown starts at 0 s when the vessel is at 2250 psia and terminates as the RCS pressure and liquid subcooling decrease. Peak break flow for the MLOCA is at least a factor of 15 less than that observed for the LLOCA. In addition, the resulting vapor velocity in the containment peaks around 30 ft/s, as opposed to 200–300 ft/s for the LLOCA. These observations suggest less severe debris generation and transport caused by the LOCA jet itself. Another significant observation is that after MLOCAs, the exit flow at the break plane remains subcooled throughout the blowdown, at least until the vessel pressure falls to a point where blowdown would have little effect on debris generation. This may affect the ZOI over which debris would be generated.

### 1.4.3.2 Emergency Core Cooling System Injection Phase

There are three fundamental differences between an MLOCA and an LLOCA.

- ECCS injection begins before termination of the RCS blowdown. Initiation of injection occurs after 20–60 s, whereas the blowdown phase is not terminated until approximately 180 s.
- The LPSI does not inject significant quantities of water into the core in the short term. The LPSI (or RHR) pumps start injecting into the core at about 15 min.
- In the plants analyzed, spray actuation occurs shortly after ECCS injection begins (approximately 3 min, right around the termination of the RCS blowdown).

### 1.4.3.3 Recirculation Phase

The recirculation-phase accident characteristics for the MLOCA are similar to those described in Sec. 1.4.2.3 for the LLOCA. The sump recirculation flow rate for each plant analyzed was approximately half of that for the LLOCA simulation. The containment pressure and temperature increased following the ECCS switchover to the recirculation mode at 57 min, due to an increase in the spray water temperature, from approximately 105° to 150°F.

**Table 1-5 Debris Generation and Transport Parameters: MLOCA—Large Dry Containment**

Parameter	Blowdown Phase			Injection Phase			Recirculation Phase		
	0+	30 s	180 s	20 s	15 min	57 min	57 min	2 h	24 h
RCS pressure at break (psia)	2250	900	508						
RCS temperature at break (°F)	537	521	392		330	274	274		
Break flow (lb/s)	4940	1670	1000						
Break flow velocity (ft/s)	510	190	108						
Break flow quality	0	0	0		0.03	0.03	0.03	0	
Safety injection (gpm)				885	2500	2500			
Recirculation flow (gpm)							8250	2550	2550
Spray flow (gpm)		0	5700		5700	5700	5700	0	
Spray temperature (°F)			105		105	150	150	150	
Containment pressure (psig)	0	6	9.5		5	3	3	4.2	1.5
Containment temperature (°F)	110	170	182		160	140	140	148	120
Pool depth (ft)					0.9	3.3	3.3	3.3	3.3
Pool temperature (°F)					170	145	145	147	125
Pool pH									
Containment atmosphere velocity (ft/s)	35	10	5						
Containment relative humidity (%)	50	100	100		98	98	98	98	100
Paint temperature (°F)	110		160		175	160	160	155	121
Peak break flow:	4940 lb/s at 0+ s			Peak break flow velocity:			510 ft/s at 0+ s		
Quality at peak break flow:	0			Quality at peak break flow velocity:			0		
Peak containment pressure:	10.2 psig at 2 min			Peak containment atmosphere velocity:			35 ft/s at 0+ s		

**Table 1-6 Debris Generation and Transport Parameters: MLOCA—Ice Condenser Containment**

Parameter	Blowdown Phase			Injection Phase			Recirculation Phase		
	0+	30 s	180 s	20 s	15 min	34 min	34 min	2 h	24 h
RCS pressure at break (psia)	2250	900	508						
RCS temperature at break (°F)	537	521	392		330	300	300		
Break flow (lb/s)	4940	1670	1000						
Break flow velocity (ft/s)	510	190	108						
Break flow quality	0	0	0		0.03	0.03	0.03	0	
Safety injection (gpm)				885	2500	2500			
Recirculation flow (gpm)							9000	9000	9000
Spray flow (gpm)		0	6400		6400	6400	6400	6400	6400
Spray temperature (°F)			105		105	105	92.5	86.5	84
Containment pressure (psig)	0+	9.8	7.8		4	4	4	1.8	1.4
Containment temperature (°F)	100	145	151		110	110	110	87	90
Pool depth (ft)					4	7.9	7.9	8	9.6
Pool temperature (°F)					150	146	146	117	104
Pool pH									
Containment atmosphere velocity (ft/s)	30	2.5	1.25						
Containment relative humidity (%)	0	10	40		80	97	97	97	98
Paint temperature (°F)	100	101	125		130	125	125	95	90
Peak break flow: 4940 lb/s at 0+ s		Peak break flow velocity: 510 ft/s at 0+ s							
Quality at peak break flow: 0		Quality at peak break flow velocity: 0							
Peak containment pressure: 11 psig at 55 s		Peak containment atmosphere velocity: 30 ft/s at 0+ s							

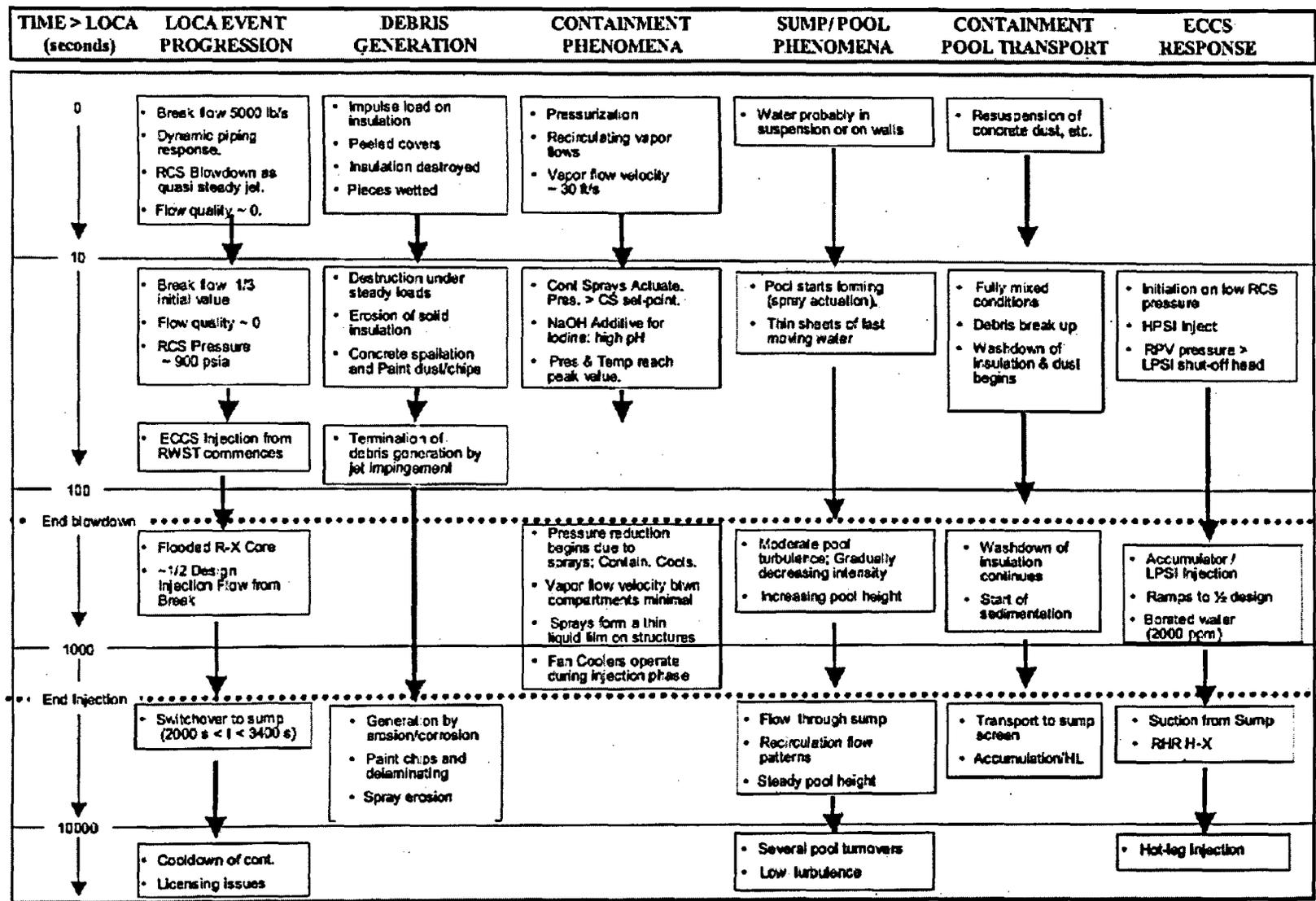


Figure 1-5 PWR MLOCA Progression in a Large Dry Containment

#### 1.4.4 Small Loss-of-Coolant Accident

The SLOCA studied was a 2-in. diameter, circular hole in a cold leg, corresponding to a cross-section area of 0.0218-ft<sup>2</sup>, downstream of the RCP.<sup>11</sup> The hole became full-sized instantaneously. It was situated on the side of the cold leg and centered halfway up. A conservative discharge coefficient of unity was defined. The cold-leg location of the hole was chosen arbitrarily and is not expected to be a determining factor in the simulation results. The 2-in. specification of this hole was made with the expectation that the RCS pressure would stabilize above the accumulator pressure such that the accumulators would not inject.

The calculated results for the SLOCA events in large dry, ice condenser, and sub-atmospheric containments are provided in Tables 1-7 through 1-9, respectively. Figure 1-6 presents the time scales associated with the occurrence of some of the events.

##### 1.4.4.1 Reactor Coolant System Blowdown Phase

RCS blowdown in the case of an SLOCA occurs over a prolonged period (60 min). Blowdown starts at 0 s when the vessel is at 2000 psia and terminates mainly as the RCS pressure and liquid subcooling decrease. Peak break-flow velocities for the SLOCAs are a factor of 30 less than those for the LLOCA and a factor of 2 less than those for the MLOCA. Containment atmosphere velocities are a factor of 30–60 less than those for the LLOCA and a factor of 2 less than those for the MLOCA. Another significant observation is that following SLOCAs, the exit flow at the break plane remains subcooled throughout the blowdown (at least until the vessel pressure falls to a point where blowdown would have little effect on debris generation). This may affect the ZOI over which debris would be generated.

##### 1.4.4.2 Emergency Core Cooling System Injection Phase

There are fundamental differences between an SLOCA and an LLOCA.

<sup>11</sup>The study also simulated a 1.75-in. break. The results were found to be very similar to the 2-in. break.

- The LPSI does not inject into the core at all; the HPSI and charging pumps are sufficient to make up for lost inventory.
- Actuation of containment sprays is highly plant-specific and may not be needed at all. In the large dry containment plant analyzed (which has a CS actuation set point of 9.5 psig), spray operation is not required.<sup>12</sup> Spray actuation is seen after 30 min in the ice condenser simulation and after 15 min in the sub-atmospheric plant. Even then, the operator may terminate sprays during the SLOCA event to prolong RWST availability and rely on fan coolers (or the ice condenser) for decay heat removal from the containment. Note that washdown of debris from the upper containment to the floor pool may be limited to more localized areas (near the break) for plants in which containment sprays are not required. As noted in Section 1.4.1, some plants, such as CE plants, have containment heat removal capability that can be relied upon to cool the containment indirectly without spray cooling.
- Paint is exposed to significantly higher peak temperatures following a LLOCA than it would be following a SLOCA.

##### 1.4.4.3 Recirculation Phase

The recirculation-phase accident characteristics for the SLOCA are similar to those described in Sec. 1.4.2.3 for the LLOCA. The primary difference is that the required flow rates for the SLOCA are significantly less than those for the LLOCA (as low as 2500 gpm for plants in which containment sprays do not actuate). The paint temperatures for paint on thin steel remains a few degrees hotter in the long-term for a SLOCA compared with a LLOCA, but the paint temperatures would be about the same for paint on concrete surfaces.

##### 1.4.5 Other Plant Design Features That Influence Accident Progression

Other plant design features (beyond those previously discussed) may influence the debris-

<sup>12</sup>Again, the results presented here are for an accident scenario in which fan coolers operate. Other calculations suggest a peak containment pressure during an SLOCA in a large-dry containment could reach values nearing 18 psig if fan coolers fail to operate.<sup>1-27</sup>

**Table 1-7 Debris Generation and Transport Parameters: SLOCA—Large Dry Containment**

Parameter	Blowdown Phase			Injection Phase			Recirculation Phase		
	0+	30 min	1 h	60 s	2 h	3 h	3 h	12 h	24 h
RCS pressure at break (psia)	2250	605	512						
RCS temperature at break (°F)	538	354	371		270	236	236		
Break flow (lb/s)	550	343	300						
Break flow velocity (ft/s)	320	320	320						
Break flow quality	0	0	0						
Safety injection (gpm)				1500	2500	2500			
Recirculation flow (gpm)							2500	2500	2500
Spray flow (gpm)	Sprays not required								
Spray temperature (°F)									
Containment pressure (psig)	0	5	5		4	3	3	1	0.75
Containment temperature (°F)	110	160	160		150	140	140	115	110
Pool depth (ft)			0.8		1.5	2.25	2.25	3	3
Pool temperature (°F)			157		157	150	150	125	118
Pool pH									
Containment atmosphere velocity (ft/s)	9	4	4						
Containment relative humidity (%)	50	100	100		100	100	100	100	100
Paint temperature (°F)	100	160	160		157	153	153	127	117
Peak break flow: 550 lb/s at 0+ s			Peak break flow velocity: 320 ft/s at 0+						
Quality at peak break flow: 0			Quality at peak break flow velocity: 0						
Peak containment pressure: 6 psig at 38 min			Peak containment atmosphere velocity: 9 ft/s at 20 s						

**Table 1-8 Debris Generation and Transport Parameters: SLOCA—Ice Condenser Containment**

Parameter	Blowdown Phase			Injection Phase			Recirculation Phase		
	0+	30 min	1 h	60 s	15 min	35 min	35 min	5 h	24 h
RCS pressure at break (psia)	2250	605	512						
RCS temperature at break (°F)	538	354	371		391	362	362		
Break flow (lb/s)	550	343	300						
Break flow velocity (ft/s)	320	320	320						
Break flow quality	0	0	0						
Safety injection (gpm)				1500	2500	2500			
Recirculation flow (gpm)							9000	9000	9000
Spray flow (gpm)		6400	6400	0	6400	6400	6400	6400	6400
Spray temperature (°F)		105	91		105	105	91	87.5	86
Containment pressure (psig)	0+	4.1	3.6	3.4	4.4	4.2	4.2	2.25	1.8
Containment temperature (°F)	100	111	96.5	94	112	110	110	92	95
Pool depth (ft)		5.5	6.75		2.5	6.5	6.5	9	8.9
Pool temperature (°F)		137	132		137	137	137	120	114
Pool pH									
Containment atmosphere velocity (ft/s)	2.9	0.7	0.7						
Containment relative humidity (%)	0	97	97	6	100	97	97	97	97
Paint temperature (°F)	100	110	104	100	106	110	110	92	96
Peak break flow: 550 lb/s at 0+ s				Peak break flow velocity: 320 ft/s at 0+					
Quality at peak break flow: 0				Quality at peak break flow velocity: 0					
Peak containment pressure: 4.4 psig at 15 min				Peak containment atmosphere velocity: 2.9 ft/s at 23 s					

<b>Table 1-9 Debris Generation and Transport Parameters: SLOCA—Sub-Atmospheric Containment</b>									
<b>Parameter</b>	<b>Blowdown Phase</b>			<b>Injection Phase</b>			<b>Recirculation Phase</b>		
	<b>0+</b>	<b>30 min</b>	<b>1 h</b>	<b>60 s</b>	<b>1 h</b>	<b>3 h</b>	<b>3 h</b>	<b>12 h</b>	<b>24 h</b>
RCS pressure at break (psia)	2250	605	512						
RCS temperature at break (°F)	538	354	371		270	236	236		
Break flow (lb/s)	550	343	300						
Break flow velocity (ft/s)	320	320	320						
Break flow quality	0	0	0						
Safety injection (gpm)				1500	2500	2500			
Recirculation flow (gpm)							2500	2500	2500
Spray flow (gpm)					9000	9000	9000	9000	9000
Spray temperature (°F)					105	150	150	125	120
Containment pressure (psig)	0	5	5		4	3	3	1	0.75
Containment temperature (°F)	110	160	160		150	140	140	115	110
Pool depth (ft)			0.8		1.5	2.25	2.25	3	3
Pool temperature (°F)			157		157	150	150	125	118
Pool pH									
Containment atmosphere velocity (ft/s)	9	4	4						
Containment relative humidity (%)	50	100	100		100	100	100	100	100
Paint temperature (°F)	100	160	160		157	153	153	127	117
Peak break flow: 550 lb/s at 0+ s			Peak break flow velocity: 320 ft/s at 0+						
Quality at peak break flow: 0			Quality at peak break flow velocity: 0						
Peak containment pressure: 6 psig at 38 min			Peak containment atmosphere velocity: 9 ft/s at 20 s						

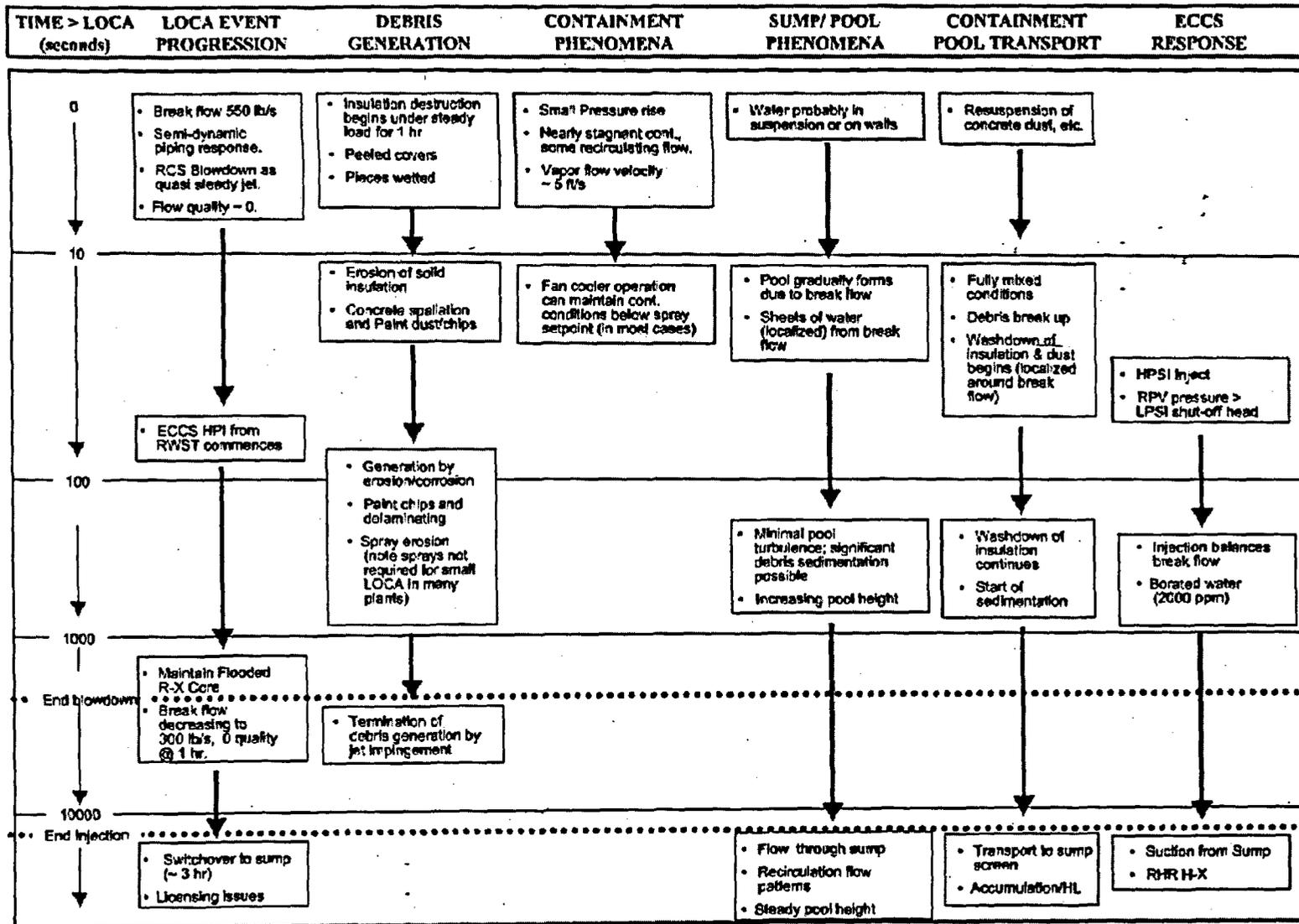


Figure 1-6. PWR SLOCA Accident Progression in a Large Dry Containment

related accident progression. For example, in many plants, heat exchangers are installed directly in the core-cooling recirculation flow paths to ensure that the water is cooled before it is returned to the core. However, in some plants, the core cooling recirculation systems do not have dedicated heat exchangers and instead make indirect use of heat exchangers from other systems (i.e., CS) to ensure that heat is removed from the reactor coolant. Examples of plants where core cooling makes indirect use of heat exchangers from CS includes the plants with sub-atmospheric containments and CE plants. For these types of plants, successful core cooling during recirculation may require (1) direct sump flow from the core cooling system and (2) sump recirculation cooling from the CS system.

For plants with sub-atmospheric containments, switchover for the set of "inside" recirculation spray pumps is performed quickly (approximately 2 min), whereas the switchover for ECCS pumps and CS pumps is considerably longer (on the order of 30 min or more depending on LOCA type). The relatively quick switchover of the inside recirculation spray pumps is accomplished to minimize containment pressure and temperature. The inside recirculation spray system is equipped with a heat exchanger, and it appears that its actuation is credited in estimating the NPSH margin for the ECCS and CS system during the recirculation phase.

Recovery from a stuck-open PORV may be possible at many plants through operator actions to close the associated block valve. The need for sump recirculation could be avoided by this action.

The containment structures are sufficiently robust that failure of CS is not expected to cause containment failure from overpressure.

### **1.5 Description of Relevant Plant Features that Influence Accident Progression**

Some general conclusions regarding important plant features that influence accident outcome

are listed below. The primary source for this information is the PWR plant survey published in 2002.<sup>1-26</sup>

#### Sump Design and Configurations

- The ECCS and/or CSS pumps in nearly one-third of the PWR plants surveyed have an NPSH margin less than 2 ft-water, and another one-third have an NPSH margin between 2-ft water and 4-ft water. In general, PWR sumps have low NPSH margins compared with the head loss effects of debris accumulation on the sump screen.
- PWR sump designs vary significantly, ranging from horizontal screens located below the floor elevation to vertical screens located on pedestals. The sump-screen surface areas vary significantly from unit to unit, ranging from 11 ft<sup>2</sup> to 700 ft<sup>2</sup> (the median value is approximately 125 ft<sup>2</sup>). Some plants employ curb-like features to prevent heavier debris from accumulating on the sump screen, and some do not have any noticeable curbs.
- In 19 PWR units, the sump screen would not be completely submerged at the time that ECCS recirculation starts. The mode of failure is strongly influenced by sump submergence.
- Sump-screen clearance size varies considerably. A majority of the plants used a sump-screen opening size of 0.125 in., reportedly to ensure that the maximum size of the debris that can pass through the sump screen is less than the smallest clearance in the RCS and the CSS. However, 26 PWR units indicated that sump-screen clearance is higher than 0.125 in., reaching up to 1 in. Two units reported not having fine screens, other than the standard industrial grating used to filter out very large debris.

#### Sources and Locations of Debris

- U.S. PWRs employ a variety of types of insulation and modes of encapsulation, ranging from non-encapsulated fiberglass to fully encapsulated stainless steel RMI. A significant majority of PWRs have fiberglass and calcium-silicate insulations in the containment, either on primary piping or on

supporting systems.<sup>13</sup> The types of fibrous insulation varied significantly, but much of it is in the form of generic low-density fiberglass (LDFG) and mineral wool. It appears that many of the newer plants (or plants replacing steam generators) have been replacing RMI insulation on the primary systems with "high-performance" fiberglass. In general, the smaller pipes and steam generators are more likely to be insulated with fiberglass and calcium-silicate than the reactor pressure vessel or the hot leg or cold leg. Other sources of fibrous materials in the containment for some plants include up to approximately 13,000 ft<sup>3</sup> of filter media on the air-handling units and up to 1500 ft<sup>3</sup> of fibrous insulation (e.g., Kaowool) used as fire barrier materials. Given that (a) very small quantities of fibrous insulation would be necessary to induce large pressure drops across the sump screens (less than 10 ft<sup>3</sup>) and (b) most plants have comparatively very large inventories of fibrous insulation, it is clear that plant-specific analyses are necessary before the recirculation sumps of any particular plant can be declared safe with respect to screen blockage.

- Other sources of debris in the PWR containments include cement dust and dirt (either present in the containment *a priori* or generated by a LOCA), particulate insulations used on the fire barriers (e.g., Marinite), failed containment coatings (a medium-sized PWR has approximately 650,000 ft<sup>2</sup> of coated surfaces in the containment), and precipitants (zinc and aluminum precipitation by-products).<sup>14</sup> Estimates for this type of debris range from 100 lb to several 1000 lb; either of these bounds would result in very large head losses when combined with fibrous material.

<sup>13</sup>About 40 PWR units have in excess of 10% of the plant insulation in the form of fiberglass and another 5–10% in the form of calcium-silicate. A typical plant has approximately 7500 ft<sup>3</sup> of insulation on the primary pipes and supporting systems pipes that are in close proximity to the primary pipes.

<sup>14</sup>PWR DBAs evaluate the potential for precipitation of aluminum and zinc when they are subjected to high-pH, hot, borated water because these chemical reactions generate H<sub>2</sub>.

### Containment Features Affecting Debris Transport

- CS set points typically are defined based on LLOCA and equipment qualification considerations. Consequently, sprays may not (automatically) actuate during SLOCAs<sup>15</sup> because of the lower peak containment pressures associated with SLOCAs. CS actuation following an SLOCA event plays an important role in the transport of debris to the sump, and at the same time, it affects the timing of sump failure.<sup>16</sup> Set points for CS actuation vary considerably and span a wide range: 2.8 psig to 30 psig. Consistently lower values are observed in sub-atmospheric and ice condenser containment designs, as would be expected. Nevertheless, values at or below 10 psig<sup>17</sup> are observed for large dry containments, as well.

### 1.6 Regulatory Considerations

Federal regulations were established to govern the design and operational aspects of nuclear power reactors that affect the safety of those plants. These regulations are codified in the CFR. Title 10<sup>1-8</sup> of the CFR deals with energy and Part 50 of Title 10<sup>1-8</sup> consists of regulations promulgated by the NRC to provide for the licensing of production and use of facilities. The NRC published RG documents to guide the nuclear power industry to compliance with the regulations. Regulations and regulatory guidance applicable to the strainer blockage

<sup>15</sup>Fan cooler response to LOCAs also plays a vital role in determining spray actuation following SLOCA. These concerns are not applicable to LLOCAs or MLOCAs, where automatic actuation of sprays is expected in every plant.

<sup>16</sup>The drainage of the spray water from the upper reaches of the containment down to the containment sump could transport substantial quantities of debris to the sump that otherwise would likely remain where deposited following the RCS depressurization (i.e., the containment sprays would substantially increase the fraction of debris transported to the sump screens over the fraction that would be transported without spray operation).

<sup>17</sup>The 10-psig set point is important because MELCOR simulations showed that if both fan coolers in a large dry containment are not operating at full capacity, containment pressure could exceed 10 psig for breaks  $\geq 2$  in.<sup>1-27</sup>

issue are summarized in Sections 1.6.1 and 1.6.2, respectively.

### 1.6.1 Code of Federal Regulations

This section provides a description of the regulations that apply to the strainer blockage issue. Title 10 of the CFR<sup>1-8</sup> provides the authority to the NRC to regulate nuclear power plants. Section 50.46, "Acceptance Criteria for Emergency Core Cooling Systems for Light-Water Nuclear Power Reactors," of 10 CFR<sup>1-8</sup> requires that licensees of a BWR or PWR design their ECCS systems to meet five criteria. Specifically, the rule provides acceptance criteria for peak cladding temperature, maximum cladding oxidation, maximum hydrogen generation, coolable core geometry, and long-term cooling. The long-term cooling criterion states, "After any calculated successful initial operation of the ECCS, the calculated core temperature shall be maintained at an acceptably low value and decay heat shall be removed for the extended period of time required by the long-lived radioactivity remaining in the core." Licensees are required to demonstrate this capability while assuming the most conservative (worst) single failure. Some licensees may credit CSSs in the licensing basis for radioactive source-term and pressure reduction. The capability of the ECCS and safety-related CSS pumps to fulfill the criteria of limiting the peak cladding temperature and to provide long-term cooling over the duration of the postulated accident could be seriously compromised by the loss of adequate NPSH and the resulting cavitation. Operational experience and detailed analysis demonstrated that excessive buildup of debris from thermal insulation, corrosion products, and other particulates on ECCS pump strainers is highly likely to cause a common-cause failure of the ECCS thereby preventing the ECCS from providing long-term cooling following a LOCA. Therefore, Section 50.46 clearly applies to the strainer blockage issue, and licensees must resolve this issue for their respective plants in order to ensure compliance with the regulations.

General Design Criteria (GDC) 35, 36, 37, 38, 39, and 40 in Appendix A to 10 CFR Part 50<sup>1-8</sup> require appropriate design, inspectability, and testability of the ECCS and the containment heat

removal systems.<sup>18</sup> These GDC establish minimum requirements for the principal design criteria for water-cooled nuclear power plants similar in design and location to plants for which the NRC has issued construction permits. The GDC also are considered to be generally applicable to other types of nuclear power units and are intended to provide guidance in establishing the principal design criteria for such other units. Specifically, these criteria state the following.

*Criterion 35 – Emergency core cooling.* A system to provide abundant emergency core cooling shall be provided. The system safety function shall be to transfer heat from the reactor core following any loss of reactor coolant at a rate such that (1) fuel and clad damage that could interfere with continued effective core cooling is prevented and (2) clad metal-water reaction is limited to negligible amounts. Suitable redundancy in components and features, and suitable interconnections, leak detection, isolation, and containment capabilities shall be provided to assure that for onsite electric power system operation (assuming offsite power is not available) and for offsite electric power system operation (assuming onsite power is not available) the system safety function can be accomplished, assuming a single failure.

*Criterion 36 – Inspection of emergency core cooling system.* The emergency core cooling system shall be designed to permit appropriate periodic inspection of important components, such as spray rings in the reactor pressure vessel, water injection nozzles, and piping, to assure the integrity and capability of the system.

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<sup>18</sup> GDC 41, 42, and 43, which define criteria for containment atmosphere cleanup, apply in regards to the availability of containment spray systems to remove fission products from the containment atmosphere. In addition, Section 50.67 of 10 CFR Part 50, which addresses accident source terms, would be affected should ECCS be lost due to sump blockage. Further, 10 CFR Part 100 details reactor site criteria including factors considered when evaluating reactor sites such as the expectation those reactors will reflect through their design, construction, and operation an extremely low probability for accidents that could result in release of significant quantities of radioactive fission products.

**Criterion 37 – Testing of emergency core cooling system.** The emergency core cooling system shall be designed to permit appropriate periodic pressure and functional testing to assure (1) the structural and leaktight integrity of its components, (2) the operability and performance of the active components of the system, and (3) the operability of the system as a whole and, under conditions as close to design as practical, the performance of the full operational sequence that brings the system into operation, including operation of applicable portions of the protection system, the transfer between normal and emergency power sources, and the operation of the associated cooling water system.

**Criterion 38 – Containment heat removal.** A system to remove heat from the reactor containment shall be provided. The system safety function shall be to reduce rapidly, consistent with the functioning of other associated systems, the containment pressure and temperature following any loss-of-coolant accident and maintain them at acceptably low levels. Suitable redundancy in components and features, and suitable interconnections, leak detection, isolation, and containment capabilities shall be provided to assure that for onsite electric power system operation (assuming offsite power is not available) and for offsite electric power system operation (assuming onsite power is not available) the system safety function can be accomplished, assuming a single failure.

**Criterion 39 – Inspection of containment heat removal system.** The containment heat removal system shall be designed to permit appropriate periodic inspection of important components, such as the torus, sumps, spray nozzles, and piping to assure the integrity and capability of the system.

**Criterion 40 – Testing of containment heat removal system.** The containment heat removal system shall be designed to permit appropriate periodic pressure and functional testing to assure (1) the structural and leaktight integrity of its components, (2) the operability and performance of the active components of the system, and (3) the operability of the system as a whole, and under conditions as close to the design as practical the performance of the full operational sequence that brings the system into operation, including operation of applicable portions of the protection system, the transfer

between normal and emergency power sources, and the operation of the associated cooling water system.

Section 50.65 of 10 CFR Part 50, "Requirements for monitoring the effectiveness of maintenance at nuclear power plants"<sup>1-8</sup> (referred to hereafter as the Maintenance Rule) provides the requirements for monitoring and maintenance of plant structures, systems, and components (SSCs). The maintenance rule requires the licensee of a nuclear power plant to monitor the performance or condition of SSCs in a manner sufficient to provide reasonable assurance that the SSCs are capable of fulfilling their intended functions. When the performance or condition of an SSC does not meet its established goals, appropriate action shall be taken. Based on the criteria in the rule, the maintenance rule includes in its scope BWR suction strainers, all safety-related CSSs, and those non-safety-related CSSs that fall into the following categories.

1. Those that are relied on to mitigate accidents or transients or are used in plant emergency operating procedures
2. Those whose failure could prevent safety-related CSSs from fulfilling their safety-related function
3. Those whose failure could cause a reactor scram or an actuation of a safety-related system.

Protective coatings also are covered by the Maintenance Rule to the extent that coating activities can affect safety-related equipment, e.g., suction strainers. On the basis of the guidelines in the rule, the maintenance rule requires that licensees monitor the effectiveness of maintenance for these protective coatings. The staff also considers the requirements of 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,"<sup>1-8</sup> to be applicable to safety-related containment coatings. Criterion IX of Appendix B, "Control of Special Processes," is especially relevant requiring that "Measures shall be established to assure that special processes are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements."

Appendix K of 10 CFR Part 50,<sup>1-8</sup> "ECCS Evaluation Models," establishes requirements

for analytical determinations that impact aspects of the strainer blockage issue. These analytical requirements include:

1. fission product decay heat generation rate (affects the calculated suppression pool temperature),
2. break flow characteristics and discharge model (affects the estimated amounts of debris),
3. post-blowdown phenomena and heat removal by the ECCS, and
4. required ECCS model documentation.

Appendix K also specifies that single failures be considered and the containment pressure to be used for evaluating cooling effectiveness.

### 1.6.2 Regulatory Guidance

This section provides a description of regulatory guidance that applies to the strainer/sump blockage issue. The NRC provided guidance on ensuring adequate long-term recirculation cooling following a LOCA in RG 1.82, "Water Sources for Long-Term Recirculation Cooling Following a Loss-of-Coolant Accident."<sup>1-7</sup> The guide describes acceptable methods for implementing applicable GDC requirements with respect to the sumps and suppression pools functioning as water sources for emergency core cooling, containment heat removal, or containment atmosphere cleanup. Guidelines for evaluating availability of the sump and suppression pool for long-term recirculation cooling following a LOCA are included in the RG 1.82.<sup>1-7</sup>

Revisions 1 and 2 of RG 1.82 were issued in November 1985 and May 1996, respectively; Revision 3 is scheduled for September 2003. The first revision, Revision 1, reflected the staff's technical findings related to USI A-43<sup>1-1</sup> that were reported in NUREG-0897.<sup>1-4</sup> A key aspect of the revision was the staff's recognition that the 50% strainer blockage criterion of Revision 0 did not address the issue adequately and was inconsistent with the technical findings developed for the resolution of USI A-43.<sup>1-1</sup> It was assumed in Revision 0 that the minimum NPSH margin could be computed by assuming that 50% of the screen area was blocked by debris. GL 85-22<sup>1-33</sup> recommended use of RG 1.82 Revision 1<sup>1-7</sup> for changeout and/or modifications of thermal insulation installed on primary coolant system piping and components. Revision 2 altered the strainer blockage

guidance for BWRs because operational events, analyses, and research following Revision 1 indicated that the previous guidance was not comprehensive enough to adequately evaluate a BWR plant's susceptibility to the detrimental effects caused by debris blockage of the suction strainers.

RG 1.82 Revision 2<sup>1-7</sup> guidance addressed operational debris, as well as debris generated by a postulated LOCA. Specifically, the Regulatory Guide stated that all potential debris sources should be evaluated, including, but not limited to, insulation materials (e.g., fibrous, ceramic, and metallic), filters, corrosion material, foreign materials, and paints/coatings. Operational debris included corrosion products (such as BWR suppression pool sludge), and foreign materials (FME procedures were not specifically introduced into Rev. 2). Revision 2 also noted that debris could be generated and transported by the washdown process, as well as, the blowdown process. Other important aspects of Revision 2 included: the use of debris interceptors (i.e., suction strainers) in BWR designs to protect pump inlets and NPSH margins; the design of passive and/or active strainers; instrumentation, in-service inspections; suppression pool cleanliness; the evaluation of alternate water sources, analytical methods for debris generation, transport, and strainer blockage head loss, and the need for appropriate supporting test data. Revision 2 references provide further detailed technical guidance for the evaluation of potential strainer clogging. Guidance for the evaluation of potential sump clogging for PWR plants will be provided in Revision 3 of RG 1.82.

RG 1.82 Revision 2<sup>1-7</sup> cited RG 1.1,<sup>1-34</sup> "Net Positive Suction Head for Emergency Core Cooling and Containment Heat Removal System Pumps," for specific conditions to be used in determining the available NPSH for ECCS pumps in a BWR plant's licensing basis. RG 1.1<sup>1-34</sup> considered the potential for degraded pump performance for ECCS and containment heat removal, which could be caused by a number of factors, including inadequate NPSH. If the available NPSH to a pump is not sufficient, cavitation of the pumped fluid can occur, thereby significantly reducing the capability of the system to accomplish its safety functions. It is important that the proper performance of the ECCS and containment heat removal systems be independent of calculated increases in

containment pressure caused by postulated LOCAs to ensure reliable operation under a variety of postulated accident conditions. The NRC's regulatory position is that the ECCS and containment heat removal systems should be designed with adequate NPSH margin assuming the maximum expected temperatures of the pumped fluids and no increase in containment pressure above atmospheric.

The NRC issued Revision 1 of RG 1.54, "Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants," in July 2000<sup>1-35</sup> to provide guidance regarding compliance with quality assurance requirements related to protective coating systems applied to ferritic steel, aluminum, stainless steel, zinc-coated (galvanized) steel, and masonry surfaces. The revision encourages industry to develop codes, standards, and guide that can be endorsed by the NRC and carried out by industry. With noted exceptions, the ASTM standards cited in the Regulatory Position of Revision 1 for the selection, qualification, application, and maintenance of protective coatings in nuclear power plants have been reviewed by the NRC staff and found acceptable.

Additional guidance is found in the applicable sections of the NRC SRP.<sup>1-6</sup> These sections include:

1. Section 6.2.2, "Containment Heat Removal Systems,"
2. Section 6.1.2, "Protective Coating Systems (Paints) – Organic Materials," and
3. Section 6.2.1.5, "Minimum Containment Pressure Analysis for Emergency Core Cooling System Performance Capability Studies."

## 1.7 Report Outline

This report is organized in the order that screen blockage analyses are usually performed. The analysis is usually decomposed into several steps as listed below.

- Section 2 discusses the identification of the potential sources of debris at the plant under evaluation.
- Section 3 discusses the testing and analytical models associated with estimating

the volumes of debris that could potentially be generated.

- Section 4 discusses the testing and analytical models associated with the transport of the debris within the upper containment, i.e., blowdown debris transport and subsequent washdown debris transport by the containment sprays.
- Section 5 discusses the testing and analytical models associated with the transport of the debris within the sump pool.
- Section 6 discusses the accumulation of debris on a sump screen or a pump suction strainer.
- Section 7 discusses the estimation of the head loss associated with a particular debris bed on a sump screen or a pump suction strainer.
- Section 8 discusses the redesigns of sump screens or pump suction strainers that have occurred during the resolutions of strainer blockage issue.
- Section 9 discusses the related significant events that have occurred both in the U.S. and internationally.
- Section 10 discusses the summary and conclusions of the report.

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## 2.0 DEBRIS SOURCES

Sources of debris that could contribute to the potential clogging of a strainer or sump screen include LOCA-generated debris, exposure-generated debris, and operational debris.

- LOCA-generated debris would be any materials damaged or destroyed by the effluents of a primary-system depressurization such that these materials subsequently could transport from their original location (e.g., piping insulation).
- Exposure-generated debris would be any materials damaged by prolonged exposure to the LOCA environment that subsequently could transport (e.g., failed unqualified coatings).
- Operational debris would be any resident material that normally is not considered permanently part of the plant (e.g., dust/dirt, rags, and plastic bags).

Each of these types of debris has been found following operational events and/or plant inspections.

The NEI conducted a survey on PWR sump design and operations for PWR reactors operating within the US in 1999 and forwarded the survey results to the US NRC. The NRC reviewed the survey results and published their findings in Volume 2 of NUREG/CR-6762.<sup>2-1</sup> In addition, an earlier survey was conducted in 1982.<sup>2-2</sup> These two surveys provide an overview of the types of insulation used by nuclear power plants in the US.

This section describes

- the debris actually found inside plant containments,
- the types of debris formed by LOCA depressurization effluents,
- the types of debris formed by prolonged exposure to a LOCA environment, and
- the types of debris formed by operational processes.

### 2.1 Actual Debris Found During Inspections

A wide variety of debris has been found inside the containments of operating nuclear power

plants. In some cases, the debris has rendered systems inoperable. The associated event reports are described in Section 9. Operational debris has included materials left over from the actual construction of the containment and materials left inside the containment during maintenance, repairs, and modifications. The operational and/or potential debris also includes such materials as equipment covers intended for removal before operation, tools, rope, and dust/dirt. Many event reports simply stated that miscellaneous operational debris was found without specifying the content of that debris. Failed coatings have been found where the coating pieces had or could have formed debris. The types of debris found are now listed by very general screen-blockage characteristics.

#### Fibrous Debris

Fibrous debris from sources such as temporary cooling filters used during an outage has been found inside the containment. In the most notable events, the fibers were found in suppression pools after excessive strainer head loss rendered a system inoperable.

#### Particulate Debris

Operational particulate debris has included corrosion products, construction/maintenance residues, and operational accumulations.

- Sludge buildup in suppression pools resulted from the continuous corrosion of structural steel.
- Dirt, dust, and pebble accumulations found in sumps were the result of insufficient housekeeping.
- Weld slag found in sumps was the result of insufficient cleanup following construction or modifications.

#### Transportable Sheet-Like Materials

Numerous miscellaneous, relatively transportable materials were found that would essentially behave like a solid sheet of material when they were on a strainer/screen, i.e., totally blocking a small section of the screen. These included the following.

- Sheets of thin plastic, e.g., bags or wraps
- Cloth-like materials

- Oil cloth
- Coveralls
- Nylon bags
- Duct tape
- Downcomer cleanliness covers
- Rubber mats
- Step-off pads
- Gasket materials
- Foam rubber plug

#### Relatively Non-Transportable Materials

Numerous miscellaneous materials were found that were relatively nontransportable and therefore less likely to contribute to significant strainer/sump-screen blockage, including the following.

- Tools
  - Hammer
  - Slugging wrench
  - Socket
  - Grinder wheel
  - Flashlight
- Miscellaneous hardware
  - Nuts and bolts
  - Scaffold knuckle
  - Antenna
  - Metal sheeting
  - Welding rod
  - Hoses and hose clamps
  - Tygon tubing
  - Tie wraps
  - Rope
  - Hardhats
  - Pens/Pencils

Although these materials are less likely to transport or cause strainer/sump-screen blockage, these types of debris can render a system inoperable under certain circumstances and have done so. Certainly, if the debris were left inside a sump screen, a pump could ingest it. For example, in 1980, a welding rod was found jammed between the impeller and the casing ring of an RHR system at the Trojan plant.

#### Failed Coatings

Several incidences of failed coatings and of the identification of unqualified coatings where only qualified coating should have been used were found during inspections. For example, in 1993 at North Anna Unit 1, most of the unqualified silicon-aluminum paint covering the steam

generators and pressurizer had detached from those surfaces and was held in place only by the surrounding insulation jackets.

#### Adherence to the FME and other housekeeping programs by the licensees will limit the extent of operational debris within the containment.

These include periodic inspections and cleanings to minimize the amount of foreign material and suppression-pool sludge. However, despite the ongoing FME programs, extensive quantities of foreign materials still were being found in suppression pools.

## 2.2 Loss-of-Coolant-Accident-Generated Debris

The break effluent following a LOCA would generate substantial quantities of debris within the containment, mostly within the vicinity of the break. The majority of the destruction to materials near the break would occur within the region generally designated as the ZOI. The size of the ZOI (refer to Section 3), which usually is considered to be spherical, depends on the type of material, i.e., the region of destruction could extend further for some materials than for others. However, some debris could be generated well beyond the ZOI. As the containment pressurizes, equipment covers, loose coatings, etc., could be blown free to become debris. A rapid pressurization could burst light bulbs anywhere within the containment. All of these sources of debris should be considered.

The debris generated within the ZOI would almost certainly be the largest source of transportable debris. Sources of debris within the ZOI generally include

- insulation materials and their respective jacketing,
- fire barrier materials,
- surface coatings, and
- concrete erosion.

The largest source of debris within the ZOI usually would be destroyed or damaged insulation. There are several types of insulation materials (as well as manufacturers of insulation), and each has unique destruction and transport characteristics. The types of insulation include those listed below.

- Fibrous insulation
  - LDFG
  - High-density fiberglass (HDFG)
  - Mineral wool
  - Miscellaneous other types
- RMI
  - Aluminum RMI
  - Stainless-steel RMI
- Particulate insulation
  - Calcium silicate
  - Asbestos
  - Unibestos
  - Microtherm
  - Min-K
  - Gypsum board
- Foam insulation
  - Foamglass
  - Foamed plastic
  - Armaflex
  - Vinyl cell
  - Neoprene

A number of different types of fire-barrier materials is used inside containments, but the volume of debris generated from fire-barrier materials tends to be substantially less than that of insulation, primarily because there usually would be much less fire-barrier material inside the ZOI. The pieces of failed coatings, ranging from powder to large chips of paint, would contribute to the buildup of particulate on the strainer/screen, as would the by-product of concrete erosion.

Beyond the ZOI, the LOCA-generated debris could include such materials as cloth used in equipment covers, permanent tags and stickers, and glass from broken light bulbs. The various filters located within containment potentially could contribute to the generation of debris, even though these filters are usually considered sufficiently protected that the LOCA flows (beyond the ZOI) would not damage the filter sufficiently to form debris. These filter materials could include filter paper, fiberglass, high-efficiency particulate air (HEPA) filters, and charcoal.

### 2.3 Loss-of-Coolant-Accident Exposure-Generated Debris

After the primary system depressurization is complete, the materials inside the containment would be subject to the high temperatures and

humidity resulting from the depressurization. In addition, the containment sprays, if activated, would impact and wet surfaces throughout the containment continuously. Prolonged exposure to the LOCA environment (both during depressurization and afterward) could cause some materials to fail, thereby generating additional debris.

One concern is that protective coatings within containments would have the potential to detach from their substrate as a result of prolonged exposure to a LOCA environment. Qualified protective coatings are expected to adhere to their substrates during a design-basis LOCA (DB-LOCA), except those coatings directly impacted by the break jet. A research program conducted at the Savannah River Technology Center to investigate the performance and potential for debris formation of coating systems used in nuclear power plant containments<sup>2,3</sup> concluded that qualified, properly applied coatings that have not been subjected to irradiation of  $10^9$  rads can be expected to remain fully adhered to and intact on a steel substrate following exposure to all simulated DB-LOCA conditions. However, coatings that have been subjected to irradiation of  $10^8$  rads exhibited profound blistering, even when properly applied, leading to disbondment of a near-surface coating layer (1–2 mils of the 10-mil thickness) when exposed to elevated temperatures and moisture conditions within the range of DBA conditions. This phenomenon likely would produce a coating-debris source term.

All coatings inside the containment are not qualified,<sup>2,4</sup> and therefore, the amount of unqualified coatings must be controlled because the unqualified coatings are assumed to detach from their substrates during a DB-LOCA and may be transported to the emergency sump screens or suction strainers. Several instances have been reported to the NRC in which protective coatings either have not been applied/maintained properly or have not been qualified adequately for their intended use.<sup>2,5</sup>

The characteristics of failed coating debris have been examined by the BWROG for selected types of coatings and test conditions.<sup>2,6</sup> Test samples were prepared by first exposing the coating to a minimum radiation dose of  $10^9$  rads at an average dose rate of 1.65 Mrads/h at the University of Massachusetts Lowell Radiation Laboratory. The specimens next were subjected

to a series of three LOCA tests at the Testing Department of the Carboline Company to investigate the post-LOCA failure mechanisms and the failure timing of the coating systems. A scanning electron microscope was used to perform a detailed examination of pieces of debris. Microhardness measurements also were taken and compared for selected coating types. The coating debris examined ranged from powder residues to large, slightly curved pieces.

The LOCA environment, especially with the containment sprays operating, also could fail the adhesive intended to attach tags or labels permanently to walls and equipment. This type of debris material could well transport to the sump screens or suction strainers.

The exposure of the LOCA environment would likely cause oxidation of metallic surfaces that could generate transportable particulate debris.<sup>1</sup> There are unpainted metallic surfaces (steel, zinc, and aluminum) in all PWR containments that would be exposed in an accident environment to hot and highly borated water. The borated water would react with those surfaces, generating particulates.<sup>2-1</sup> Estimating the potential quantity of these particulates is difficult because the oxidation rates depend on a variety of parameters, such as the type of chemistry, the water temperature, the pH of the water, and the aeration of the water. The investigation of this phenomenon is only cursory at this time, and the current estimates vary greatly, depending on the values of the assumed parameters.

In addition to generating certain types of debris, exposure to the LOCA environment can degrade previously generated debris further. For example, individual fibers from pieces of relatively nontransportable or trapped fibrous debris likely would break free, at least to some extent, forming transportable debris. In the case of calcium-silicate debris, small particles likely would break free from the larger pieces. This issue needs to be addressed in debris-transport calculations.

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<sup>1</sup>Ongoing research is studying the importance of this potential source of debris, but it likely is negligible in the short term.

## 2.4 Operational Debris

Operational debris is debris formed from the operational erosion of containment materials or from materials that normally would not be left inside the containment during operation. A tool would be an example of a material left inside the containment following a period of maintenance. The location of debris such as a tool would be important to whether that tool could have an adverse affect. An example of operational erosion would be the iron oxide sludge that forms continuously in a BWR wetwell. Some of this sludge likely would always be found in the wetwell, but it should be kept to a minimum by cleaning of the wetwell during outages. Good general housekeeping is needed to limit debris such as dirt/dust that can accumulate throughout the containment. Even if an area of the containment looks clean, small quantities of dirt/duct could be located out of sight in and around equipment where the containment sprays would transport that debris to the sump. Operational debris has included (but is not limited to) the following.

- Wetwell sludge
- Dirt and dust
- Rust on unpainted surfaces
- Products of wear and tear (e.g., paint chips)
- Temporary air treatment filters
- Tools
- Rags
- Sheeting of various materials
- Plastic products (e.g., plastic bags)
- Paper products
- Rope
- Tape
- Wire ties
- Fire hoses

The quantities of operational debris present inside containment are plant-specific. The FME and other housekeeping programs might well be able to reasonably ensure that certain operational debris is not present, at least in places where the debris can transport to the sump screens or suction strainers. Much of the history of foreign materials inside containment predates the FME program. However, foreign material continues to be found inside containment.<sup>2-4</sup>

## 2.5 Aging Effects on Mineral Fiber Thermal Insulation

The effects of aging on mineral fiber thermal insulation would affect, at least to some extent, the generation of insulation debris, its subsequent transport to a PWR sump screen or a BWR suction strainer, and the resultant head loss across a bed of debris on that screen/strainer. The aging effects could include exposure to high temperatures, exposure to radiation, and operational damage. Of these types of aging or damage, the exposure to high temperature is the most significant effect. Insulation damaged significantly during normal operational of the plant normally would be replaced because of its reduced ability to perform its function. Although gamma and neutron radiation at sufficient intensity would decompose organic binders, operational observations do not indicate a significant aging resulting from exposure to radiation.

Mineral fiber insulation consists of either of two different types of material: fiberglass insulation and mineral or rock wool insulation. Fiberglass insulation is made from melted glass that is spun into fibers about 2 in.-long and, for mechanical products, with a 5- to 7-micron fiber diameter and a product bulk density of 2 to 3 lbs/ft<sup>3</sup>. These fibers are very flexible and resilient and essentially are free of "shot" or inorganic particles and short fibers. In contrast, mineral wool insulation is made from melted rock and/or slag and spun into fibers about ½ in. long and 3 to 10 microns in diameter. Typical bulk densities for mechanical mineral wool products are 6 to 10 lb/ft<sup>3</sup>. Mineral wool insulation products typically have a significant "shot," or particle and short fiber content, of 15 to 30% by weight.

The important aging effect appears to be the degradation of fiber insulation as a result of exposure to the high temperatures of the piping being insulated. Mineral fiber insulations all use a binder to essentially adhere the fibers to one another, thereby forming a fiber matrix that creates the pack of fibers. Binders are usually made from a phenolic resin and typically constitute about 3% by weight<sup>2-7</sup> for LDFG insulation. These binders are hydrophobic in nature but decompose chemically (into gases) at temperatures greater than about 450°F.<sup>2-8</sup> Typical RCS coolant temperatures range from

about 560°F at the vessel inlet to about 620°F at the vessel outlet, well above the fibrous insulation decomposition temperature. Because of the temperature gradient through the fiber pack, only part of the binder decomposes; i.e., only the portion where the insulation temperature exceeds 450°F. On a 600°F surface, this decomposed portion is typically about 1/3 of the total binder content.

A reduction in the binder that cements the fibers together could increase the generation of the very fine debris during a LOCA, which in turn would enhance debris transport to the sump screen or suction strainer. Less binder in the fibrous debris bed could allow the fiber to compact tighter with a corresponding reduction in bed porosity and increase in head loss across the bed. The aging effect would vary with the type insulation (e.g., LDFG insulation compared with mineral wool insulation). Head-loss testing has included tests using fibrous insulation artificially aged by heat-treating the test specimens. A typical heat treatment has been to place the specimen on a 650°F hot plate for a few days (4 days per ASTM C411), thereby heating only one side of the specimen as would occur to insulation installed around a pipe.<sup>2-9</sup> Definitive data regarding the effects of aging on debris generation, transport, and head loss are scarce. Realistically, at this time, it can be said only that the effect could be significant and perhaps substantial for specific types of fibrous insulation.

## 2.6 Relative Timing and Debris Bed Composition

The relative arrival time of debris onto the sump screens or suction strainers can affect the composition of the accumulated debris and the associated head loss. The head loss also would depend on the timing of the recirculation pump operation and the pool height at activation. The initial formation of a bed of debris on the screens after the activation of recirculation pumping likely would consist of debris located in the sump at the time of the accident and debris transported to the sump in the short term. Debris initially located in the sump could consist of operational debris left in the sump area and LOCA generated debris deposited in the sump during blowdown debris transport. During the period of short-term transport (the first few hours following the break), a majority of the transportable debris

likely would be transported to the sump by the containment sprays (assuming the containment spray systems were activated). In the longer term, debris transport would consist primarily of exposure-generated debris and the erosion of larger non-transportable debris.

## 2.7 References

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### 3.0. DEBRIS GENERATION

This section describes the mechanisms by which the hydrodynamic forces created during a LOCA destroy insulation on neighboring piping and other components, creating debris available for transport to the containment sump.

Experimental measurements of the quantities of debris generated when insulation is subjected to these forces also are summarized. Finally, analytical models for estimating the quantity of debris generated during postulated LOCAs of various sizes and locations within the containment are described.

Critical locations within a PWR containment where the accumulation of debris would adversely affect recirculation performance also are described. What is currently known about the effect of parameters such as insulation type and debris size on the spatial distribution of debris fragments on the surface of the screen is discussed as well. This information was gathered primarily from experimental observations of debris accumulation on simulated PWR sump screens.

Various mechanisms have been postulated for generating debris as a consequence of a postulated LOCA in a PWR. Analysis performed to resolve USI A-43 indicated that dynamic (shock) forces and mechanical erosion caused by impingement of the steam/water jet from the broken pipe on neighboring pipe insulation, equipment coatings, and other structures would be the dominant mechanism for LOCA-generated debris.<sup>1</sup> This finding was retained in the subsequent re-evaluation of LOCA-generated debris in US BWR plants.<sup>2</sup>

<sup>1</sup> Other mechanisms include acceleration forces associated with pipe whip and mechanical damage caused by the impact of the broken pipe on neighboring structures. The potential for debris generation by these mechanisms was examined in support of the resolution to USI A-43.<sup>3-1</sup> This assessment concluded that "jet impingement is by far the most significant of the insulation debris generation mechanisms." Consequently, debris generation from pipe whip and pipe impact is not discussed further in this document.

<sup>2</sup> This includes the NRC contractor analyses summarized in NUREG/CR-6224<sup>3-2</sup> and Utility Resolution Guidance (URG) prepared by the BWR Owners' Group (BWROG).<sup>3-3</sup> The NRC issued a Safety Evaluation Report (SER) regarding the BWROG URG.<sup>3-4</sup>

The physical processes that govern debris generation by this mechanism, particularly as it relates to the damage or destruction of piping and component insulation, are described in Section 3.1. Published data on this subject are summarized in Section 3.2. As is often the case, much of the data collected in US and international research programs were collected in well-instrumented, but idealized, laboratory conditions. Therefore, an analytical method is required to apply the data to the more complex conditions associated with reactor/containment designs with varying configurations and potential debris sources. Useful models and methods for estimating the quantities of debris generated by a postulated LOCA are described in Section 3.3.

#### 3.1 Overview of the Mechanics of Debris Generation

Component insulation is destroyed initially by the blast effects of a shock wave that expands away from the break in the RCS piping when it first opens.<sup>3</sup> The strength of the shock wave decays rapidly as it expands away from the break plane because of the increased volume (decreased density) of the expanding steam/water mixture. This initial shock wave may cause substantial damage to even the most heavily reinforced insulating constructions (e.g., steel-jacketed RMI or fiber) if they are located sufficiently close to the break. After the shock wave passes, shear forces and consequential erosion of piping insulation, paint, coatings, and other materials in the wake of the break jet result in additional debris generation.<sup>4</sup>

In an ideal (unobstructed) environment, the shock wave expands away from the break in a spherical pattern. The steam/water jet expands

<sup>3</sup> Analysis performed by General Electric for BWR coolant system pressures (1000 psia or 70 bar) suggests a shock wave might not be generated if the break opening time were sufficiently long, as might occur if the "leak-before-break" assumption were adopted [BWROG, 1996].

<sup>4</sup> The current understanding of debris-generation phenomena is that the initial blast (shock) accompanying rupture of a high-pressure steam- or water-filled pipe does not have a significant effect on such debris sources as equipment or containment surface coatings. However, it would cause substantial resuspension of dirt, dust and other loose particulate material in the area.

away from the break plane in the shape of a cone. Experimental measurements and analytical studies have allowed the pressure distribution within a conical jet to be characterized with reasonable accuracy (see Section 3.1.1.). Unfortunately, the current state of knowledge regarding the specific mechanisms for the damage or destruction of component insulation is not sufficiently complete to discern how near-field shock dynamics and far-field jet erosion combine to dislodge insulation from its initial location and break it apart into debris fragments of various sizes. This is in part because experiments simulating the damage or destruction of piping insulation by impingement of a high-pressure steam/water jet are able to "measure" only the end-state of the insulation material, i.e., the amount of material dislodged from a target location, and the size distribution of fragmented debris (see Section 3.2.) It is not reasonably possible to determine accurately specifically how the fragments were generated.

Another factor that complicates an evaluation of debris generation is the high degree of congestion in close proximity to many candidate break locations in a typical PWR containment. The close proximity of insulated components, containment structures, and other obstacles limits the usefulness of break-jet pressure distributions measured in an idealized,

unobstructed environment. Rarefaction and reflected expansion waves are generated as the shock front encounters obstacles in its path. The steam/water jet also may impact neighboring obstacles, redirecting flow from portions of the jet and possibly dissipating some of its energy.

These complications, combined with the possibility that the break plane can move in space because of the motion of the ruptured pipe, cause the set of potential insulation "targets" to be rather large. Various analytical methods for characterizing the ZOI within which insulation might be damaged have been proposed as described in Section 3.3. These methods each attempt to correlate the energy contained in the steam/water jet to a region in space within which the jet pressure would be large enough to cause damage to various types of insulation material. In all cases, the extent of damage becomes less severe with distance from the break location. As shown in Figure 3-1, these factors lead to a damage pattern resembling concentric rings emanating from the postulated break location. The boundaries of these rings can be either conical or spherical, depending on the specific modeling assumptions used to define the ZOI. Alternative models for estimating the shapes and dimensions of these rings are described in Section 3.3.

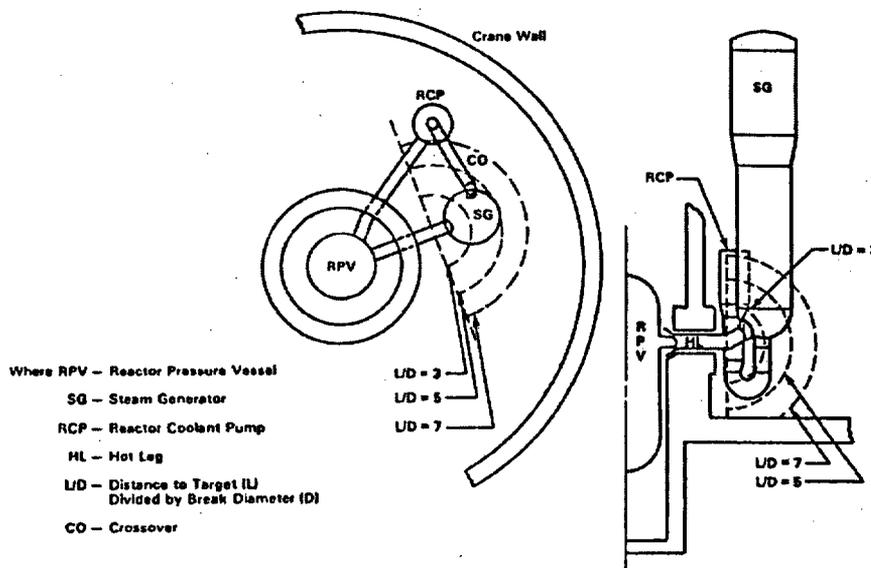


Figure 3-1 Example ZOI at a Postulated Break Location<sup>3-5</sup>

The extent of damage to insulation positioned at a given distance from the break depends on the following.

- The physical properties of the insulation component and its installation hardware
  - The material used to form the core of the insulation component (e.g., fiberglass with a blanket, layered metal sheeting within a cassette)
  - The composition and thickness of the insulation enclosure [e.g., steel jacket(s), woven fiber matting]
  - The construction and mechanical properties of the component installation hardware (e.g., banding, closure clasps, wire retainers)
- The orientation of the insulation relative to the jet<sup>5</sup>
- The exposure history of the insulation (thermal and radiation environment)<sup>6</sup>

These factors combine to affect the "damage pressure" for a particular insulating construction. "Damage pressure" is a characteristic of a particular insulating material and method of installation. It represents the maximum distance from the break plane at which an insulation blanket (if fiber) or cassette (if RMI) has been observed in controlled experiments to be dislodged from piping and break into smaller fragments (i.e., the distance where the jet pressure drops below the minimum pressure that can cause damage to the insulation).

In some analyses, this characteristic is measured simply in terms of the maximum number of pipe diameters away from the break plane where damage has been observed

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<sup>5</sup> Orientation has often been ignored in characterizing debris generation; however, as described in Section 3.2, the orientation of the seams of steel jacketing on fiber or calcium-silicate insulation can affect the extent of damage significantly.

<sup>6</sup> Exposure of some forms of insulation to sustained high temperatures and/or radiation fields can cause the base insulation materials to become brittle. For example, the binding compounds used in some types of insulation can break down under sustained heating. The resulting changes in the mechanical properties of the insulation can lead to a decrease in its characteristic damage pressure and increase the proportion of small debris fragments.

experimentally.<sup>7</sup> Another method for expressing the threshold for damage is to correlate the distance from the break to the stagnation pressure of the jet at that location (thus, the term damage "pressure"). Analytical models for associating the distance at which insulation damage is measured to stagnation pressure are described in Section 3.3. Damage pressures for various types of insulation are summarized in Table 3-1.

The term "destruction" pressure has been used interchangeably in the past (specifically during the BWR resolution studies) with "damage" pressure but herein the term "damage" pressure has been preferred to acknowledge that this pressure is a threshold pressure and that the destruction of insulation is incomplete at this pressure. The extent of damage increases as local pressures increase. The extent of damage within a ZOI is very dependent upon the type of insulation. Some more fragile types of insulations (e.g., calcium silicate) would likely be more extensively damaged than a less fragile type (e.g., RMI) in term of the fraction of the ZOI insulation turned into very fine or small debris. This subject is discussed further in Section 3.3.3.

The damage pressure also depends on (1) whether the insulation is jacketed, (2) the material and number of layers of jacketing, and (3) the orientation of the jacket seams relative to the axis of the break. The insulation jacket may provide some protection to the insulation (but not in all cases), which would be reflected in an increase in the damage pressure. The orientation of the jacket seam relative to the jet has been found to affect the damage pressure profoundly. At a seam orientation of 45°, the jacket can be opened up at the seam much more easily than if the seam was on opposite side from the jet (180°). In reality, the damage to insulation within the ZOI could be rather chaotic because the jet would impact insulation at a variety of seam and pipe orientations. Insulation closer to the jet but with its jacket seam opposite the jet might survive, whereas insulation further out was destroyed because its seam was oriented toward the jet.

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<sup>7</sup> Distance is expressed in terms of L/D, where L/D is the number of pipe diameters (D) away from the (guillotine) break plane where the insulating construction is positioned.

**Table 3-1 Damage Pressures for Insulation Materials Found in U.S. PWRs\***

Insulating Construction (Fibrous)	Damage Pressure (psi)	Insulating Construction (RMI)	Damage Pressure (psi)
Min-K	4	Mirror®/std bands	4
Koolphen-K	6	Mirror®/Sure-hold® band	150
Unjacketed Nukon®	10	Transco RMI	190
Jacketed Nukon®/std bands	10	Darchem DARMET	190
Knaupf	10		
Temp-Mat/SS wire retainer	17	<b>Insulating Construction (Other)</b>	<b>Damage Pressure (psi)</b>
K-wool	40	Calcium-silicate/aluminum jacketing	20
Jacketed Nukon®/Sure-hold® bands	150		

\*The listing of insulating materials, with the exception of the calcium-silicate pressure, was derived from responses to an NEI survey<sup>3-8</sup> and industry responses to GL 97-04;<sup>3-7</sup> information obtained from these sources is summarized in Ref. 3-10. The listed values for damage pressure are the minimum of those reported by the BWROG in its URG documents<sup>3-3</sup> and the results of confirmatory analysis performed by NRC and documented in Appendix B of Ref. 3-4. These data were based on air-jet testing. The aluminum-jacketed calcium-silicate pressure of 20 psi was determined from the OPG two-phase (steam with droplets) jet test data (Section 3.2.2.5), which is considerably lower than the BWROG air-jet test result of 160 psi. The OPG test data indicate lower damage pressures when the jet is a two-phase jet rather than an air jet. Further, the damage pressure for the jacketed calcium-silicate depended on the seam angle, and the 20-psi value was based on the optimum seam angle for damage.

Finally, the hardware used to mount an insulation blanket or cassette to piping can affect its resistance to jet forces significantly. For example, tests performed by the BWROG indicated that Sure-hold® bands had significantly better mechanical properties than standard bands with common closure clasps. As indicated in Table 3-1, application of the Sure-hold® bands resulted in an approximately 30-fold increase in the damage pressure for Nukon® fiberglass blankets and DPSC Mirror® RMI.

A common way to measure the extent of damage inflicted on component insulation during jet impact tests is to sort the resulting debris into various sizes. Increasing local pressure causes the base insulation material to fragment into smaller pieces. The resulting size distribution of debris fragments is important for evaluating the efficiency of debris transport to the recirculation sump (see Sections 4 and 5), debris accumulation profiles on the sump screen (see Section 6), and finally, screen head loss (see Section 7). Standard schemes for classifying debris sizes and shapes are described in Section 3.1.2. The available data on debris-size distributions for various insulating material are summarized in Section 3.2.

### 3.1.1 Break-Jet Phenomena

The shape of the break jet and its orientation in space depend on several factors. The most important factors are

- the size and configuration of the pipe rupture,
- the break effluent (steam, water or a two-phase mixture), and
- the size and orientation of neighboring obstacles.

The effects of these factors on a free-expanding jet can be summarized as follows.

#### 3.1.1.1 Size/Configuration of Pipe Rupture

The total volume and shape of the jet emerging from a ruptured pipe depends on the size of the ruptured pipe, the shape and area of the opening in the pipe, and (for DEGBs) the relative positions of the opposing pipe ends. Two examples are shown in Figure 3-2.

#### 3.1.1.2 Break Effluent

The thermodynamic state of the break effluent has been found to have an important effect on the rate at which jet pressure decays with distance from the break plane and the extent to which the jet expands in the radial direction. At any location along the jet centerline (beyond one pipe diameter), the local pressure for a two-phase jet (i.e., a steam/water mixture) is less than that for a steam-only jet with the same initial stagnation pressure.<sup>3-8</sup> Further, the cross-sectional area of the jet is larger for a steam-only jet than for a two-phase jet with the same initial stagnation pressure.<sup>3-9</sup>

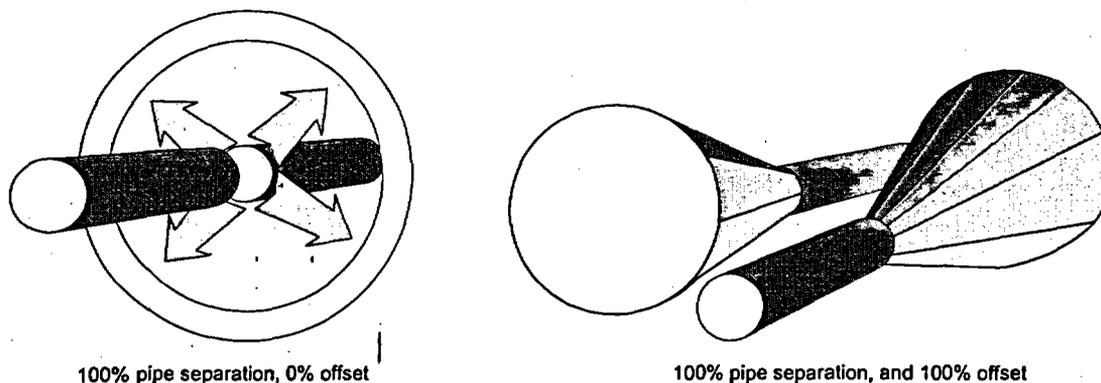


Figure 3-2 Variation in the ZOI Shape with DEGB Separation and Offset

### 3.1.1.3 Obstacles

Postulated breaks in the coolant system piping are not likely to occur at locations in the containment where there is an unobstructed, clean, line-of-sight view of insulation on neighboring components. Walls, floors, catwalks, and other structures may interfere with the trajectory of fluid emerging from a ruptured pipe. Structures close to the break can cause the standing shock wave at the break exit to be reflected, increasing local pressures. Large structures further away from the break can divert subsonic jet flow significantly, changing the overall volume and shape of the area impacted by the break effluent. A large obstacle such as a floor, wall, or large vessel (e.g., steam generator) can cast a large "shadow," preventing jet forces from affecting insulation on components on its opposite side. These factors, combined with the high degree of congestion in many locations of the containment, cause the overall region of space affected by a ruptured pipe to be much different in terms of the impacted volume shape and size than the volume swept out by an imaginary cone protruding from the break plane. These factors are taken into account in developing models to characterize the shape and dimension of the ZOI surrounding a postulated break (see Section 3.3.)

### 3.1.2 Debris Classification

To handle the differences in generation and transport effectively, LOCA-generated debris is classified into distinct debris groups: fibrous insulation debris, RMI insulation debris,

particulate insulation debris,<sup>8</sup> foam or rubber insulation debris, failed coatings debris, miscellaneous particulate, and miscellaneous operational material debris (examples are given in Section 2). Each of these groups generates debris of various sizes because of the variability in the break jet, the installed configuration of material, and other factors described above.<sup>9</sup> The size distributions of these debris species, as well as other characteristics, play an important role in transport efficiency and sump-screen accumulation patterns (see Sections 4, 5, and 6, respectively) and therefore directly affect sump performance. This effect can be illustrated by contrasting the two very different sizes of fibrous debris: fine fibers (or fines) and large fibrous mat fragments.

Fines are transported easily to the containment floor and tend to remain suspended in the pool of water for prolonged periods of time. These characteristics greatly increase the potential for fines to be transported to, and collect on, the sump screen. Large fibrous fragments can

<sup>8</sup> Calcium-silicate insulation is a common type of a particulate insulation; other types include asbestos, Unibestos, Min-K, Microtherm, and gypsum board.<sup>3-10</sup>

<sup>9</sup> The size distribution of particulate matter may not be a concern in the assessment of sump-screen blockage, and this type of debris has often been treated as simply "particulate." However, the size of individual particles can vary considerably—from common dirt/dust with characteristic diameters on the order of micro-meters to granules of ablated concrete with diameters on the order of millimeters. The size distribution could be important in a transport analysis performed to reduce the assumed complete transport of the particulate to the sump screen.

become attached to structures or captured by floor grating at upper elevations of the containment and therefore may not be transported easily to the containment floor. If these fragments reach the floor, they tend to either float or (if saturated with water) sink to the floor of the pool of water. Relatively high local pool velocities are required to move large fragments to the screen, where they tend to collect near the base of a vertical screen, leaving the upper portions of the screen free of debris (of similar size). Additionally, fines tend to form more compact and uniform beds on the screen, resulting in larger pressure drops than beds of similar thickness formed by larger fragments.

### 3.1.2.1 Size Classification of Fibrous Debris

The results of debris-generation experiments involving fibrous insulating materials demonstrate that impingement of a high-pressure jet onto fibrous insulation (jacketed or not) generates debris that spans a wide range of sizes—from individual fibers to intact or nearly intact pillows. A scheme for classifying the size of fibrous debris was developed in the NRC's evaluation of debris generation for BWRs.<sup>10</sup> Because the transport and head loss properties of fibrous debris depend on the debris shape and size, these physical characteristics are used to describe the various "classes" of debris generated when fibrous insulation is subjected to jet blasts of variable intensity. The size classification scheme is summarized in Table 3-2. Photographs of fibrous debris in Classes 3 and 5 are shown in Figure 3-3.

### 3.1.2.2 Size Classification of RMI Debris

The internal construction of a typical RMI cassette is shown in Figure 3-4. Transportable debris generated from this type of construction typically consists of small crumpled sheets of

<sup>10</sup> Actually, a number of classification schemes have been devised through the years to meet the particular needs of a test program or analysis; they range from two general groupings (fines and everything else) to the NRC seven-group scheme. Some translating between the size classification schemes may have to be done while comparing studies on the base of knowledge. For example, fine debris has been used to describe everything in the NRC classification from Classes 1 through 6, but in other analyses, the fines only cover debris that would always remain suspended. For PWR analyses, it is important to distinguish between suspended and nonsuspended debris.

the internal foil, which resembles shrapnel. Figure 3-5 is a photograph of cut pieces of RMI foil (roughly 2 in. square) and crumpled "debris."

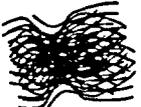
The spectrum of debris sizes typically observed in blast tests involving this type of insulation is more limited than that observed with fibrous insulation. A structured RMI debris-size classification was not developed in the NRC study of BWR strainer performance. However, four broad classes can be suggested based on observations of RMI debris generation tests (see Section 3.2) and are described in Table 3-3.

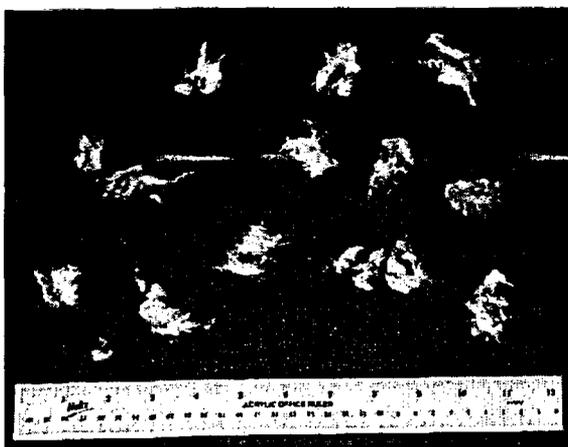
As described in the next section, the size distribution of RMI debris depends on the material used (aluminum vs stainless steel) and the cassette construction (banding, type of closure clasps, etc.).

## 3.2 Debris-Generation Testing

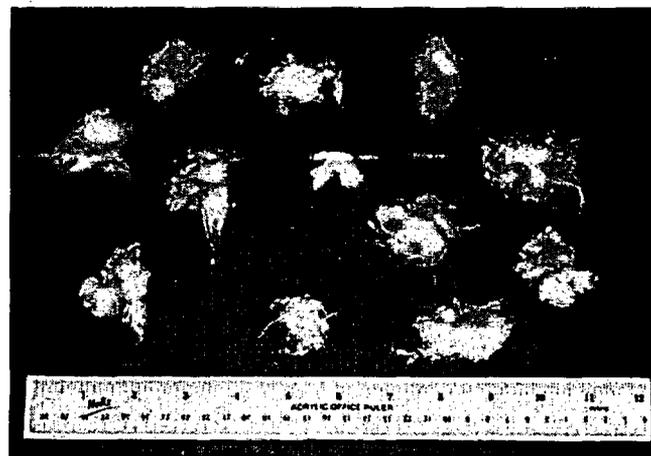
Investigators in several countries have performed experimental simulations of jet-blast impingement onto RCS insulation of various shapes, materials, and construction. One distinguishing feature of these tests is the jet effluent (air or steam/water). For reasons of economy, many early experimental studies of the destructive forces on RCS insulation materials were performed using high-pressure air jets rather than two-phase (steam/water) jets. However, analysis performed in support of a parametric evaluation of PWR recirculation sump performance<sup>3-24</sup> indicates that the ZOI associated with prototypic two-phase (steam/water) jets is larger than the ZOI indicated by air-jet simulant tests<sup>11</sup> and that the debris generated would be somewhat finer.<sup>3-11</sup> The specific cause of these differences is not well understood. Further work in this area is needed to fully explain the observed effects. Nevertheless, it is generally agreed that some adjustment should be made to the results of the air-jet tests to interpret the results properly for use in reactor containment conditions. The following summaries of debris-generation testing separate the results obtained from air jets and those obtained with more prototypic steam/water jets.

<sup>11</sup> The radius of the ZOI in the parametric study was increased to 12D from the BWROG radius of 10.4D, corresponding to a lowering of the damage pressure from 6 to 4 psi. This increase in the ZOI radius increased the volume of the spherical ZOI by 50%.

Table 3-2 Size Classification Scheme for Fibrous Debris <sup>3-2</sup>		
No.	Description	
1		Very small pieces of fiberglass material; "microscopic" fines that appear to be cylinders of varying L/D.
2		Single, flexible strands of fiberglass; essentially acts as a suspending strand.
3		Multiple attached or interwoven strands that exhibit considerable flexibility and that, because of random orientations induced by turbulent drag, can exhibit low settling velocities.
4		Fiber clusters that have more rigidity than Class 3 debris and that react to drag forces as a semi-rigid body.
5		Clumps of fibrous debris that have been noted to sink when saturated with water. Generated by different methods by various researchers but easily created by manual shredding of fiber matting.
6		Larger clumps of fibers lying between Classes 5 and 7.
7		Fragments of fiber that retain some aspects of the original rectangular construction of the fiber matting. Typically pre-cut pieces of a large blanket to simulate moderate-size segments of original blanket.



Fiberglass shreds in size Class 3



Fiberglass shreds in size Class 5

Figure 3-3. Fiberglass Insulation Debris of Two Example Size Classes

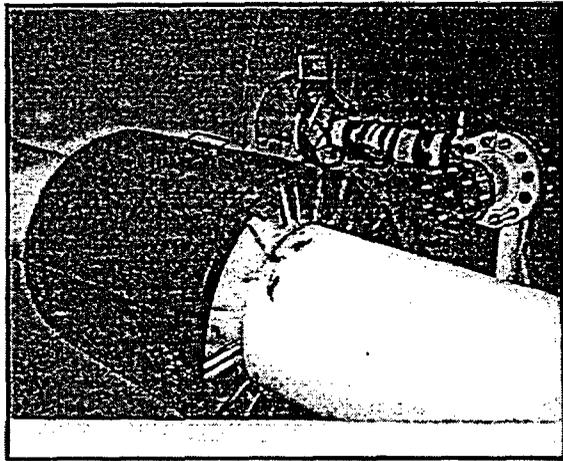
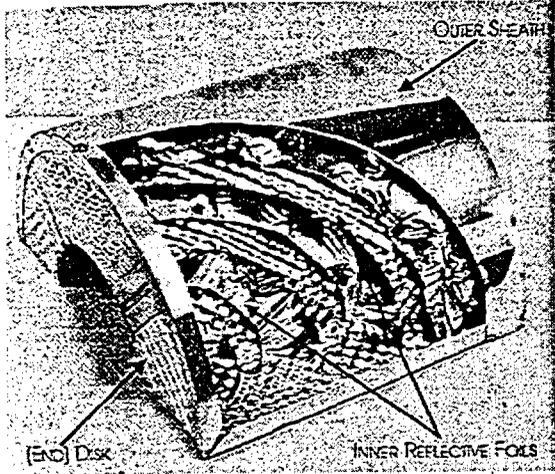


Figure 3-4 Inner Construction and Installation of a Typical RMI Cassette<sup>3-3</sup>

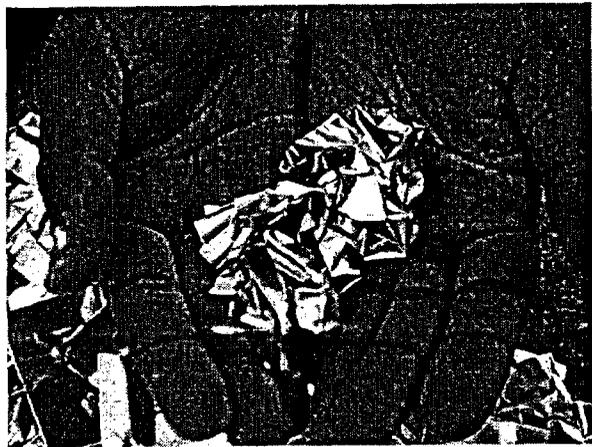
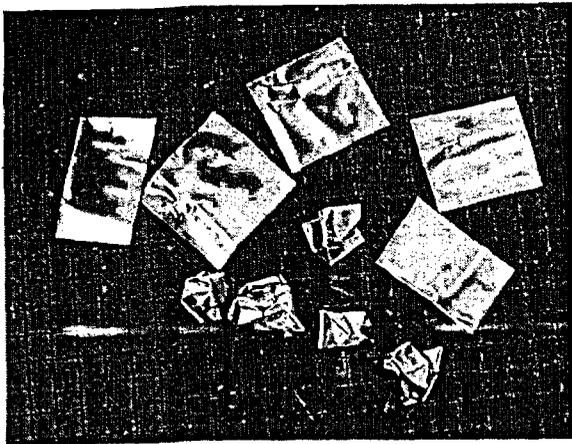


Figure 3-5 RMI Foil Before/After "Crumpling" (Left) and Crumpled RMI Foil Debris (Right)

No.	Description	
1		Small crumpled pieces of RMI foil typically 0.5 to 1.0 in. across. The crumpled foils transport more readily than flat foils and tend to "roll" along the floor of moving pool of water.
2		Small flat pieces of RMI foil typically 2 in. across.
3	Photo not available for this type of debris	Large wrapped or crumpled pieces of RMI foil or crushed sections of the outer casing of the original cassette.
4	Photo not available for this type of debris	Large flat sheets of RMI foil.

### 3.2.1 Air-Jet Testing

#### 3.2.1.1 NRC BWR Drywell Inertial Capture Tests<sup>3-12</sup>

The NRC commissioned Science and Engineering Associates, Inc. (SEA) to perform a series of tests designed to measure the extent to which LOCA-generated debris would be captured on structures internal to the drywell of a BWR during the blowdown period of a LOCA. One portion of these tests involved measurements of debris generation, transport, and inertial capture of typical BWR piping insulation materials. The tests were performed at the Colorado Engineering Experiment Station, Inc. (CEESI), which has an 11,000-ft<sup>3</sup> air-storage tank and air-blast test chamber that can be used to simulate jet impingement (and debris-transport) conditions. Exhaust air exiting the far end of the test chamber passed through a fine mesh screen (1/8-in. mesh) to capture debris that was not collected on the simulated typical drywell structures placed downstream of the target pipe. Debris-generation and transport tests were conducted at nozzle stagnation pressures of approximately 1000 psig. The test facility is shown in Figure 3-6.

Although the primary objective of these tests was to study inertial capture of debris on drywell structures, data also were collected that provide insights into the amount and size distribution of

fibrous debris.<sup>12</sup> The target material in the NRC/SEA tests conducted at CEESI was Transco fiberglass insulation encased in a tough canvas bag and designed to wrap around a pipe. Each blanket was 3 ft long and approximately 3 in. thick. The blankets were held in place by canvas straps and supported by three stainless-steel bands and two end supports to prevent axial movement along the target assembly. The Transco blankets each had two seams (i.e., each blanket was formed from two half-sections) that were arranged so that the seams were aligned with the top and bottom of the pipe 90° from the jet centerline.

Debris fragments found dispersed through the test apparatus were collected and sorted according to their size and material composition. Seven debris classes were collected.

- A. Canvassed insulation consisting of large sections of canvas covers encapsulating insulation (protecting insulation)
- B. Insulation attached to Class A debris but extruding from the canvas (unprotected insulation)
- C. Large (greater than hand-size) pieces of exposed insulation
- D. Medium (less than hand-size but smaller than grating mesh) pieces of exposed insulation

<sup>12</sup> These tests did not examine jet impingement on RMI cassettes.

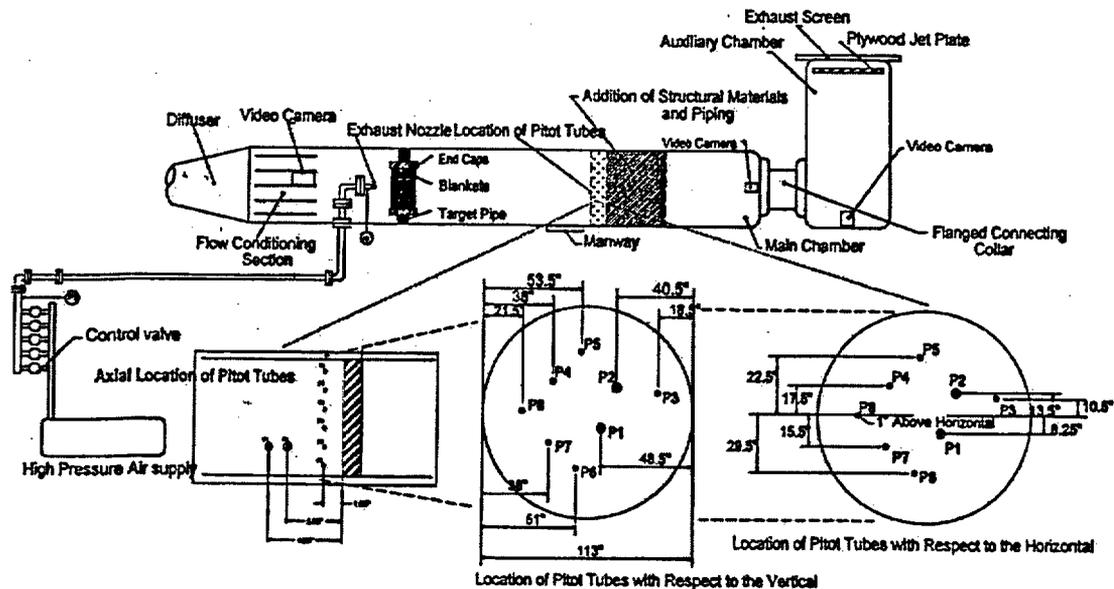


Figure 3-6 Configuration of the CEESI Test Facility for the NRC/SEA BWR Drywell Debris-Transport Tests

- E. Small (smaller than grating mesh) pieces of exposed insulation
- F. Pieces of shredded canvas without insulation
- G. Agglomerated debris consisting of a tangled mix of canvas and insulation

The findings related to fibrous-debris generation are summarized in the following paragraphs.

The target blankets were destroyed completely or nearly completely by the air blast, and the degree of destruction was generally similar among the various tests.<sup>13</sup> From 15 to 25% of the original blanket insulation mass was

classified as nonrecoverable mass; i.e., the fibrous debris either exited the test chamber through a fine mesh screen or was too fine to collect by hand. This nonrecoverable mass translates into a generation of debris fine enough to remain suspended in a pool of water indefinitely that averages about 20% of the insulation in a totally destroyed blanket. Usually one relatively large section of canvas was found on the floor near the target or hanging on the continuous grating downstream of the target mounting). This section of canvas sometimes had a substantial quantity of fiberglass attached to it (45% of the total in one test). However, in some tests, this canvas was empty of fiberglass.

<sup>13</sup> Because the main test objective was the study of debris transport, the blankets were positioned and oriented to maximize destruction, thereby creating more debris for transport. Positioning an insulation target blanket closer to the jet nozzle increased the pressure that the air jet applied to the target, hence increasing the damage to the insulation. However, if the blanket were placed too close, the ends of the target would extend beyond the flow of air from the jet so that some of the target would escape serious damage, e.g., placing the target directly in front of the jet and very close to the jet would destroy the center of the blanket but not the entire blanket. A distance was found that allowed each blanket to be essentially totally destroyed.

### 3.2.1.2 BWROG Air-Jet Impact Testing (AJIT)<sup>3-3</sup>

General Electric Nuclear Energy (GE) conducted tests at CEESI to examine the failure characteristics of fibrous insulation and RMI when they are subjected to jet impingement forces. The tests also provided data on the size distribution of the resulting debris. CEESI has compressed air facilities with 11,000 ft<sup>3</sup> of storage at 2500 psia. Insulation samples were mounted inside a wind tunnel with a perforated plate (containing 1/8-in. holes) covering an 86-in. man-way at its exit, thus allowing air to be

discharged from the facility but keeping most of the insulation debris within the test chamber. Debris-generation tests were conducted under conditions that resulted in a choked-flow stagnation pressure at the 3-in. exhaust nozzle of 1110 psig (+25/-100), simulating coolant circuit conditions in a BWR."

A total of 77 tests were performed involving four broad classes of insulation: aluminum RMI, stainless-steel RMI, fibrous insulation, and lead shielding. Four of the tests were designed to measure target pipe stagnation pressure at various distances from the jet nozzle. The insulating materials used, as well as their construction and installation, conformed to vendor standards. The following vendors and product names were examined.

**RMI**

Transco Products, Inc. (TPI)  
Diamond Power Specialty Company (DPSC)  
Mirror®  
Darchem Engineering, Ltd. DARMET

**Fiber**

NUKON® blankets (jacketed and unjacketed)  
Min-K (unjacketed)  
Temp-Mat™ (unjacketed)  
K-Wool (unjacketed)  
Knauf® (jacketed and unjacketed)

**Other**

Calcium-silicate  
Koolphen-K® closed-cell phenolic with anti-sweat jacketing

The distances from the break nozzle ranged from an L/D of 2.5 to an L/D of 116.3. The general test conclusions were summarized as follows.<sup>3-3</sup>

Throughout the AJIT Program testing, the inner and outer sheaths of reflective metallic insulation and stainless steel jacketing used on fibrous insulation did not fail in a manner, which would contribute to transportable debris. Tests of RMI conducted at distances of 2.4 L/D (7.25 in.) resulted in deformation of the cassette outer sheath but did not cause the stainless steel to be penetrated. In tests that did generate transportable reflective foil debris, the debris occurred due to the separation of the outer sheath

of the RMI cassette from the cassette side and/or (end) disk panels. The tests that generated the largest amounts of transportable debris resulted when the outer sheath or jacketing material was completely separated from the internal or jacketed insulation.

Debris generation resulting from an RMI assembly or jacketed fibrous insulation material was typically due to failure of the fastening mechanism of the assembly. Latch and strike mechanism failures occurred in 76% of the tests conducted which used latch and strike attachment mechanisms (32 of 42 tests). The latch and strike failures included straightening of the "J" hook on the strike, failure of the latch assembly (i.e., the locking clip and articulated latch hook breaking into component parts), and compression of the outer sheath or jacket to dimensions where the latch and strike were capable of release without damage to the latch and strike.

With the exception of the testing performed on Darchem DARMET® RMI (with Cam-Lock® latches and strikes) and aluminum jacketed calcium-silicate insulation, failure of the latch and strikes occurred out to distances of 100 L/D (300 in.). This corresponds to a target pipe stagnation pressure of approximately 4 psig. In the case of fibrous insulation materials, the use of jacketing as a means of reducing debris generation does not appear to be effective without the use of an additional banding material, which better secures the jacketing to the insulation assembly and the pipe.

The following values for damage pressure were recommended for fibrous and other (non-RMI) insulation materials.

Calcium-Silicate	160 psig
K-Wool	40 psig
Temp-Mat™	17 psig
Knauf® Fiberglass	10 psig
NUKON® Fiberglass (jacketed and unjacketed)	10 psig
Koolphen-K®	6 psig
Min-K	4 psig

### 3.2.2 Steam and Two-Phase Jet Testing

A large body of experimental work related to debris generation has been performed in facilities using steam or two-phase (steam/water) jets. These facilities are located in the U.S., Germany, Sweden, and Canada. The published test data are summarized in the following sections.

#### 3.2.2.1 Marviken Full-Scale Containment Experiments<sup>3-13</sup>

The Marviken Power Plant originally was designed and built as a boiling, heavy-water, direct-cycle reactor with natural circulation and provisions for nuclear superheating of steam. It was constructed and tested up to light-water commissioning tests but was never charged with nuclear fuel. The facility subsequently was used for a wide range of containment safety experiments, among which were several high-pressure blowdown experiments in which damage to equipment paint, containment (concrete) coatings, and component insulation was examined.

A series of blowdown experiments was performed between 1972 and 1973 to examine the (BWR) pressure suppression containment response and iodine transport within the containment during a simulated pipe break. These experiments also provided useful information on the extent to which containment paint and thermal insulation materials were damaged from the resulting break flow.

Components inside the containment were insulated with jacketed and unjacketed rockwool and calcium-silicate. The locations and orientations of the insulation relative to the break were not measured quantitatively; rather, the initial conditions were described in qualitative terms and with schematic (isometric) layout diagrams. The simulated pipe break also was not configured in a manner that created a coherent jet. Rather, the break plane was oriented vertically, and the break effluent impacted a horizontal deflector plate to disperse flow throughout the containment atmosphere. As noted above, the primary purpose of these tests was to examine containment thermodynamic response and bulk transport of iodine; the evaluation of insulation damage was a secondary consideration.

Qualitative observations and photographs of the extent of damage to insulation were recorded. The major findings include the following.

- Significant damage was observed to all forms of insulation in close proximity to the break location (within a few meters). In some locations, material was completely removed from its original mounted positions, and large amounts of insulation debris were found large distances from the break.
- Sheets of aluminum jacketing were stripped from some locations and were found crumpled at large distances from their initial locations.
- Test pieces shielded from the break by large concrete structures were not destroyed.

#### 3.2.2.2 HDR Tests<sup>3-5</sup>

The Heissdampfreaktor (HDR) facility is a decommissioned BWR nuclear facility in Karlsruhe, Germany, that was refit in the late 1970s for light-water-reactor research. The reactor internals were removed, and the facility was decontaminated. New equipment was installed specifically for reactor blowdown simulations in a small, but authentic, reactor containment facility. The initial thermodynamic state developed in the test vessel for blowdown simulations is 110 bar (~1600 psia) and 310°C (323°F).

Among the tests performed in the HDR (and documented in NUREG-0897<sup>3-5</sup>) were blowdown simulations specifically designed to evaluate the extent of damage to RMI and fiberglass blanket insulation during blowdown. One test (described in Appendix C of NUREG-0897) involved four specimens of stainless-steel Mirror<sup>®</sup> cassettes with fasteners installed according to manufacturer specifications. In a second series of two tests, NUKON<sup>®</sup> blankets were installed.<sup>14</sup>

The test specimens were installed on target piping or rectangular steel struts located at various positions in the HDR containment. The distance from the break nozzle and insulation samples spanned a wide range but was generally less than 7D.

<sup>14</sup> Jacketed and unjacketed samples were used in the NUKON<sup>®</sup> tests.

It is important to note that a deflection plate was positioned approximately 4 ft away from the break nozzle (450 mm inner diameter nozzle with break initiated using rupture disks) in the HDR tests to protect the containment wall. Therefore, the deflection plate distributed the break flow to the surrounding area, rather than the flow bearing down upon target material as a coherent jet.

The major observations made from these tests can be summarized as follows.

- The stainless-steel Mirror<sup>®</sup> insulation remained essentially intact when it was installed at distances greater than 7D from the break. The single sample installed closer to the break (approximately 2D) was torn apart. The outer casing was heavily damaged and compressed against neighboring structures. The inner stainless-steel foils were ripped from the casing and crumpled into relatively small pieces.
- Unjacketed NUKON<sup>®</sup> blankets positioned within 7D of the break were destroyed, with weight losses of the internal wool of 85 to 100%. Blankets jacketed with 22-gage stainless steel and installed at similar positions experienced less damage, with weight losses ranging from 7% to 75%.
- Flat NUKON<sup>®</sup> blankets covered with a metal mesh jacketing and placed above the impingement plate at a distance of 7.4D were totally destroyed.

### 3.2.2.3 Karlishamn Caposil and Newtherm Tests<sup>3-14,3-15,3-16</sup>

A series of steam-jet impact tests was conducted by Studsvik in 1993 to determine the extent to which blocks of calcium-silicate insulation material would be eroded at various distances from a postulated steam-line break. The specific material examined in these tests was Caposil HT1 and Newtherm 1000. The Caposil HT1 material was supplied by the Ringhals and Oskarshamn nuclear power plants; the Newtherm 1000 material was provided by Ringhals and ABB-Atom. The materials were tested in both aged and unaged (new installation) conditions. The aged insulation had been in service at one of the power plants at temperatures of 290°C (553°F) for approximately 15 yr.

Samples of material were cut and mounted into a firm steel casing and then mounted downstream of a steam jet. Tests were conducted in which the jet impacted the samples at 90° (i.e., perpendicular) to the sample and 45° from the sample surface. Erosion patterns on the samples were noted, and debris stripped from the sample blocks was collected for analysis. Tests were conducted with the jet positioned between 2 and 10 break-diameters from the sample. All tests involved steam jets delivered from a high-pressure storage tank at 80 bar (1160 psia) and 280°C (535°F).

Observations made from these tests included the following.

- The radius of the eroded zone was found to be roughly equal to the distance of the break plane from the material surface. This observation is consistent with the conceptual picture of an expanding 90° conical free jet.
- The stagnation pressure at the "erosion limit" (i.e., the maximum distance from the break where significant erosion was observed) was found to be 1.67 bar (24 psia).
- The extent of material erosion increased with decreasing distance from the break plane. The sample blocks were destroyed or broken into several pieces at distances of less than 5 nozzle diameters.
- The wear loss of Caposil HT1 was found to be less than that of unaged Newtherm 1000 for the same exposure time.

A series of four tests was conducted in a closed container with a filtered exhaust so that debris fragments could be collected and analyzed. After these tests, collected debris was sorted into three size bins for subsequent processing.

- Pieces picked up by hand
- Slurry separated using a 2-mm net
- "Fines" suspended in water.

ABB analyzed the particles for four cases as summarized in Table 3-4.

The "flow density" (steam mass flux) was higher in Tests 1 and 2 compared with Tests 3 and 4. This difference is cited as the reason for the lower fraction of large particle sizes in Tests 3 and 4. A deficit of approximately 10% of the

Table 3-4 Measured Particle-Size Distribution from Newtherm 1000 (Calcium-Silicate) Erosion Tests <sup>3-16</sup>						
Test No.	Mass of Material (g)					
	Particle Size (µm)			Total	Quantity Before Test	Per Cent Lost
	> 850	20-850	< 20			
1	1135.3	43.8	71.1	1250.2	1475.4	15.3
2	1002.4	77.6	73.6	1153.6	1404.5	17.9
3	775.	148.5	165.0	1088.5	1407.8	22.7
4	841.4	94.0	198.7	1134.1	1402.8	19.2

original insulating material mass was found in the total mass of debris collected in these experiments. This "mass" was ejected from the experimental facility (in spite of the exhaust filter) and is assumed to be "fine" particles.

#### 3.2.2.4 Siemens Metallic Insulation Jet Impact Tests (MIJITs)<sup>3-17,3-18</sup>

Between October 1994 and February 1995, the Swedish Nuclear Utilities conducted metallic insulation jet impact tests (MIJITs) at the Siemens AG Power Generation Group (KWU) test facility in Karlstein am Main, Germany. Although the Swedish tests were reasonably extensive, only a general summary of the test results was released. Specific test data from the RMI debris generation tests were not made publicly available. In addition, the data are not directly applicable to US power plants because the European RMI design was substantially different from the RMI currently installed in US power plants.

In 1995, the NRC conducted a single debris-generation test to generate representative RMI debris to obtain insights and data on the effects of RMI relative to US plants. These tests were contracted to Siemens AG/KWU in Karlstein, Germany.

Each of the Swedish tests examined the performance of RMI used in European nuclear stations, which was manufactured by Grünzweig and Hartmann or Darchem Engineering. The NRC test was performed using RMI cassettes frequently found in US nuclear plants. The NRC samples were provided by DPSC, the manufacturer of Mirror<sup>®</sup> RMI cassettes. The tests were performed with high-pressure, saturated water and (separately) saturated steam. The facility consisted of a tall vessel and a blowdown line with a double rupture disk and orifice (break plane) mounted at its end. Target insulation materials were installed on a 10-in.

pipe that was positioned downstream of the simulated break at distances up to 25 break-pipe diameters. The orientation and position of the target pipe relative to the jet centerline could be changed to examine the effects of an asymmetric jet impingement.

A total of seven saturated water tests and nine saturated steam tests were performed in the Swedish test program. The following observations were recorded in publicly distributed reports.

- All insulation panels directly impacted by the steam jet (up to L/D = 25) were destroyed.
- Insulation outside the core of the steam jet was not fragmented.
- The degree of destruction caused by saturated water jets was much less than that caused by saturated steam jets. Damage tended to take the form of crumpling the RMI panels rather than fragmenting them into small pieces. Panel disintegration was observed (with a water jet) only when the target became stuck in the mounting trestle and remained in the core of the jet during the 30-s blowdown. In this case, a small percentage of the panel was fragmented.

The NRC test was conducted on May 31, 1995. Most of the RMI debris was recovered and categorized by the location where it was found. Approximately 91% of the debris was recovered as loose foil pieces; the remainder was found wedged in place among the structures. The debris was analyzed with respect to size distribution. The overall size distribution for the total recovered debris mass is shown in Figure 3-7. A photograph of the RMI debris generated by this test where the RMI panel was positioned directly over the break is shown in Figure 3-8.

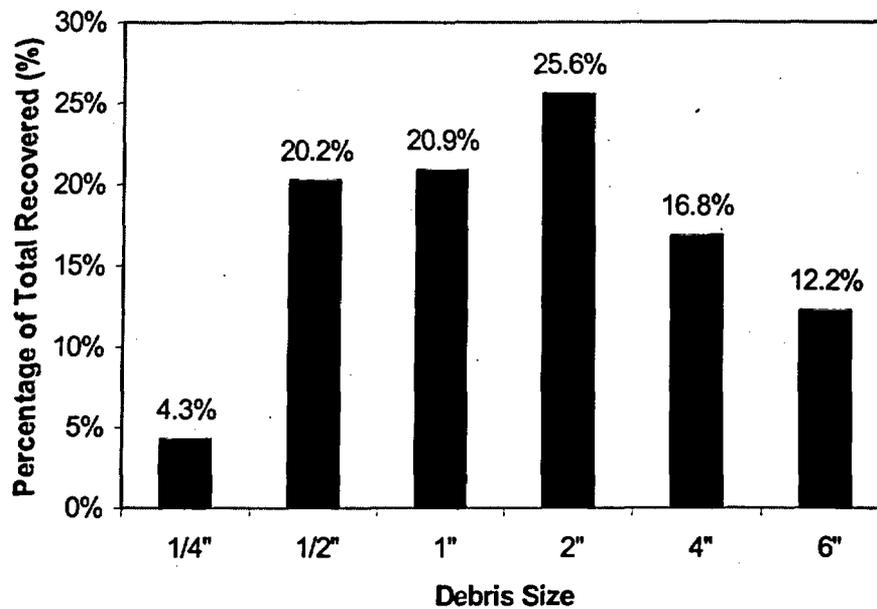


Figure 3-7 Typical RMI Debris Generated by Large Pipe Break



Figure 3-8 RMI Debris Observed in Siemens Steam-Jet Impact Tests

### 3.2.2.5 Ontario Power Generation Tests<sup>3-19</sup>

The OPG testing program was designed to address debris generation by two-phase jets created during a PWR blowdown through postulated breaks. The principal insulation of concern was aluminum-clad calcium-silicate; however, data from a single test performed with jacketed fiberglass also was made available to the NRC. In addition to broad objectives to collect data related to debris generation, an

additional (NRC) objective<sup>15</sup> was to compare the insulation damage behaviors between the two-phase OPG tests and the BWROG AJIT tests.

The OPG jet-impact test rig consisted of a tank with a capacity of approximately 2.2 m<sup>3</sup> filled with heated, pressurized water. A 3-in. schedule-160 nozzle was connected to the tank by a rupture-disk triggering mechanism,

<sup>15</sup> The NRC contributed funding to the OPG tests.

associated piping, and instrumentation. A robust sample-holding frame held the insulation in front of the nozzle at a predetermined position and orientation. A debris catch cage approximately 12 ft<sup>3</sup> in volume surrounded the nozzle and target to capture insulation debris for analysis.

With the 3-in. nozzle, the duration of the blowdown was approximately 10 s when the tank was filled initially with saturated water at a pressure of 10 MPa (1450 psia). Typical initial conditions for the tests were 324°F and 1417 psig.

#### Calcium-Silicate Tests

The target insulation was mounted on two 2-in. schedule-160 pipes. Figure 3-9 is a photograph of a typical mounting configuration. The insulation targets were 48 in. long and 1 in. thick; thus, the target outer diameter was 4.375 in. A 0.016-in.-thick aluminum cladding surrounded the insulation. The cladding and banding specifications were based on large-scale piping used in OPG's (CANDU) nuclear plants. Two or three sections of cladding (depending on the test) were required because the standard cladding length was 24 in. Thus, each target had one or two circumferential seams in addition to a longitudinal seam running its length. For calcium-silicate targets, the bands were stainless steel with a thickness of 0.020 in. and standard crimp connectors. For the single fiberglass test, the bands were 0.5 in. wide and 0.05 in. thick. The average spacing between bands<sup>16</sup> was 6.5 in.

The longitudinal seam was oriented at an angle relative to the jet centerline. The targets were always mounted with their centerlines perpendicular to the jet centerline. The convention used was 0° at the front, 90° on the top, 180° at the rear, and 270° at the bottom. Most tests were conducted at an angle of 45°.

Because clad failure was found to be sensitive to the angle of the longitudinal seam, a few tests were performed in which a second layer of cladding was added to the target with the longitudinal seam of the outer clad positioned 45° from the jet and the seam of the inner clad positioned 180° from the outer clad.

<sup>16</sup> For tests in which the jet was centered between the bands (circumferential seam offset from the jet center), the spacing was 8 in.

In addition to orientation of the longitudinal seam of cladding, test variables included the distance of the target from the jet and the position of the circumferential seam relative to the jet centerline. One test also was performed in which the target was positioned with a radial offset relative to the jet centerline. A summary of the specific test conditions examined (for calcium-silicate insulation) is shown in Table 3-5. Note that some test conditions were repeated to examine the reproducibility of the results (e.g., tests 1, 2, and 4).

For test conditions in which insulation was liberated, debris was collected by hand and sorted into three size classes: over 3 in., between 3 in. and 1 in., and under 1 in. Substantial quantities of debris were too small to be collected, and this debris was termed "dust;" its mass was calculated by subtracting the collected mass from the initial target insulation mass. The results are shown in Table 3-6. Photographs of debris in each of the collectable size classes are shown in Figure 3-10.

In addition to the measured debris size distributions, the following observations were made.

- When failure occurred, the mode of failure was tearing of the cladding caused by pressure acting on the edge of the (longitudinal) seam, thus exposing insulating material to the jet. The failure mode was such that a large fraction of calcium-silicate remained on the piping, protected from the jet by cladding on the front of the pipe. However, rapid disintegration and/or erosion of the calcium-silicate on the back side of the pipe caused a substantial fraction of the initial insulation mass to be converted to dust.
- The fraction of calcium-silicate converted to dust was found to be as high as 46% at target distances between 5D and 11D from the break. The level of material disintegration remained significant but reduced to 14% at 20D.
- The position of the longitudinal seam of the aluminum cladding was an important factor in determining whether insulation damage occurred.
  - When the longitudinal seam of over-clad calcium-silicate insulation was directly in line with the jet (at 0°), damage was observed at distances up to 7D.

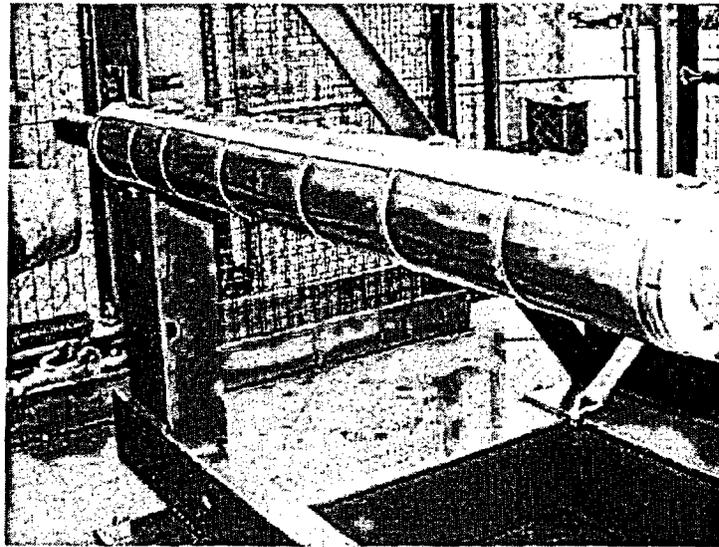


Figure 3-9 Insulation Target Mounting Configuration in OPG Test (Longitudinal Seam at 45°, Circumferential Seam Offset)

Table 3-5 Test Matrix for the OPG Calcium-Silicate Jet Impact Tests					
TEST	Target Distance from Break	Over-cladding?	Orientation of Longitudinal Seam	Position of Circumferential Seam	RESULTS Insulation Liberated?
1	7D	No	0°	Jet center	Yes (small amount)
2	7D	No	0°	Jet center	No
3	5D	No	0°	Jet center	Yes
4	7D	No	0°	Jet center	No
5	5D	No	0°	Jet center	Yes
6	5D	No	180°	Jet center	No
7	5D, 2D radial offset	No	0°	Jet center	No
8	7D	No	45°	Offset	Yes
9	4D	Yes	45°	Offset	No
10	3D	Yes	45°	Offset	No
11	4D	Yes	45°	Offset	No
12	9D	No	45°	Offset	Yes
13	11D	No	45°	Offset	Yes
14	13D	No	45°	Offset	Yes
15	20D	No	45°	Offset	Yes

TEST	Target Distance	Initial Weight (g)	Remaining on Target (g)	Debris Size Classes			
				Over 3 in. (g)	1 to 3 in. (g)	Under 1 in. (g)	Dust (g)
5	5D	2109	1112	238	247	31	481
7	5D, offset 2D	2074	1325	75	160	49	465
8	7D	2116	1578	52	118	34	334
12	9D	2089	1263	48	136	55	587
13	11D	2090	1252	114	120	37	567
14	13D	2143	1700	53	61	23	306
15	20D	2130	1654	98	60	17	301



Figure 3-10 Typical Calcium-Silicate Debris Collected from an OPG Two-Phase Jet Test

- When the seam was oriented 45° away from the jet, damage occurred out to 20D, the furthest distance tested.<sup>17</sup>

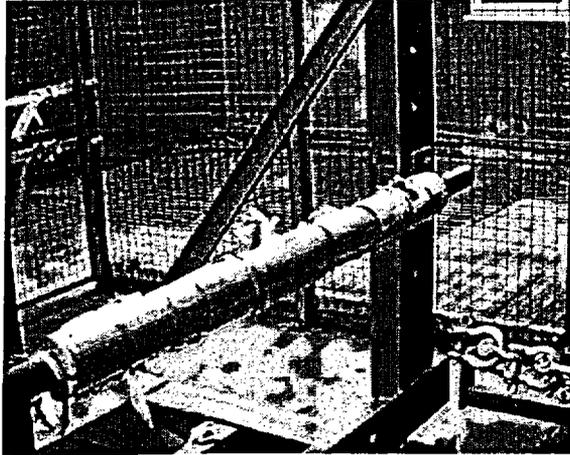
<sup>17</sup> The jet centerline pressure at 20D estimated using the American National Standards Institute/American Nuclear Society (ANSI/ANS) 58.2 model (Section 3.3.1.1) was about 24 psi (Ref. 3-11, Volume 3). Because tests were not conducted at distances beyond 20D and damage could occur at distance somewhat greater than 20D, the minimum or onset pressure for damage would be somewhat less than 24 psi. When the jacket seam was oriented at 45°, the estimated minimum pressure for the onset of damage to the insulation was judged to be about 20 psi. Note that at distances of 20D, the analytical model used

- When the longitudinal seam was rotated away from the jet (180°), no damage was found at 5D.

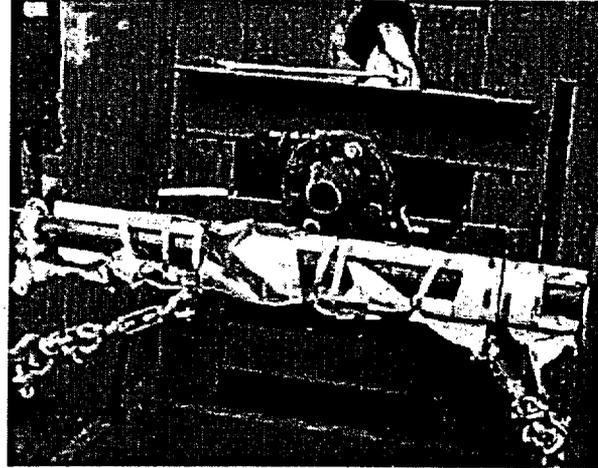
- Application of a second layer of cladding (over-clad) successfully prevented damage with the insulation positioned as close as 3D from the break.

Photographs of the end state of the calcium-silicate target insulation for one of the OPG tests that resulted in insulation damage are shown in Figure 3-11.

to estimate the pressure could have significant uncertainty associated with the estimate.



Front view



Back view

**Figure 3-11 Post-Test Configuration of Aluminum-Clad Calcium-Silicate Insulation (Distance from Break of 9D and Longitudinal Seam at 45°)**

#### Low-Density Fiberglass Test

The results of a single OPG test involving LDFG were available to the NRC. The general construction of the target insulation was similar to that described above for calcium-silicate: 0.016-in. aluminum cladding and the 0.5-in.-wide, 0.05-in.-thick stainless-steel bands. The target was positioned 10D away from the break nozzle, and the longitudinal seam of the cladding was oriented at 45°.

Extensive damage was observed along the full length of the insulation target. Fiberglass on the back side of the target pipe was removed completely; fiberglass on the front side was compressed and remained trapped by dented (but not perforated) cladding.

Shreds of the dislodged fiberglass were collected and sorted into three size classes: over 3 in., between 3 in. and 1 in., and under 1 in. As with the calcium-silicate, substantial quantities of debris were too small to be collected; however, the debris mass was calculated by subtracting the collected mass from the initial target insulation mass. The results are shown in Table 3-7.

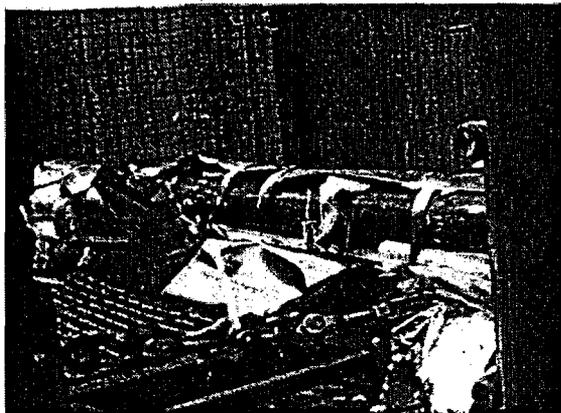
Photographs of the fiberglass target insulation at the conclusion of an OPG test are shown in Figure 3-12.

#### **3.2.2.6 Battelle/KAEFER Tests<sup>3-20</sup>**

Battelle Ingenieurtechnik conducted a series of debris generation experiments in 1995 for a German manufacturer of insulating systems—KAEFER Isoliertechnik GmbH. The experiments were performed in a facility constructed at an earlier time for simulations of high-pressure, two-phase vessel blowdown. The facility consisted of an electrically heated pressure vessel and appended piping that were isolated from the environment by a fast-opening burst-disk assembly designed to not discharge any fragments that might interfere with downstream insulation targets. The burst-disk assembly was set to open at an internal pressure of approximately 140 bar (2030 psia). Therefore, debris-generation measurements could be performed at pressures close to those of typical PWR systems.

A unique feature of these experiments is the arrangement of target insulating systems downstream of the break orifice. In contrast to debris-generation experiments performed by other investigators, which positioned a single target in the wake of the jet, the Battelle/KAEFER tests were conducted using an array of targets as shown in Figure 3-13. The array included four insulated 80-mm (3.2-in.-) diameter pipes positioned at different distances and orientations from the break plane. Two of

Table 3-7 Size Distribution of Fiberglass Debris in Tests Where Insulation Was Liberated							
TEST	Target Distance	Initial Dry Weight (g)	Dry Weight Remaining on Target (g)	Debris Size Classes			
				Dry Weight Over 3 in. (g)	Dry Weight 1 to 3 in. (g)	Dry Weight Under 1 in. (g)	Dry Weight of Unaccounted "fines" (g)
22	10D	530	250	6	21	4	249



Back side of target pipe



Collected debris

Figure 3-12 Post-Test Configuration of Aluminum-Clad Fiberglass Insulation (Distance from Break of 10D and Longitudinal Seam at 45°)

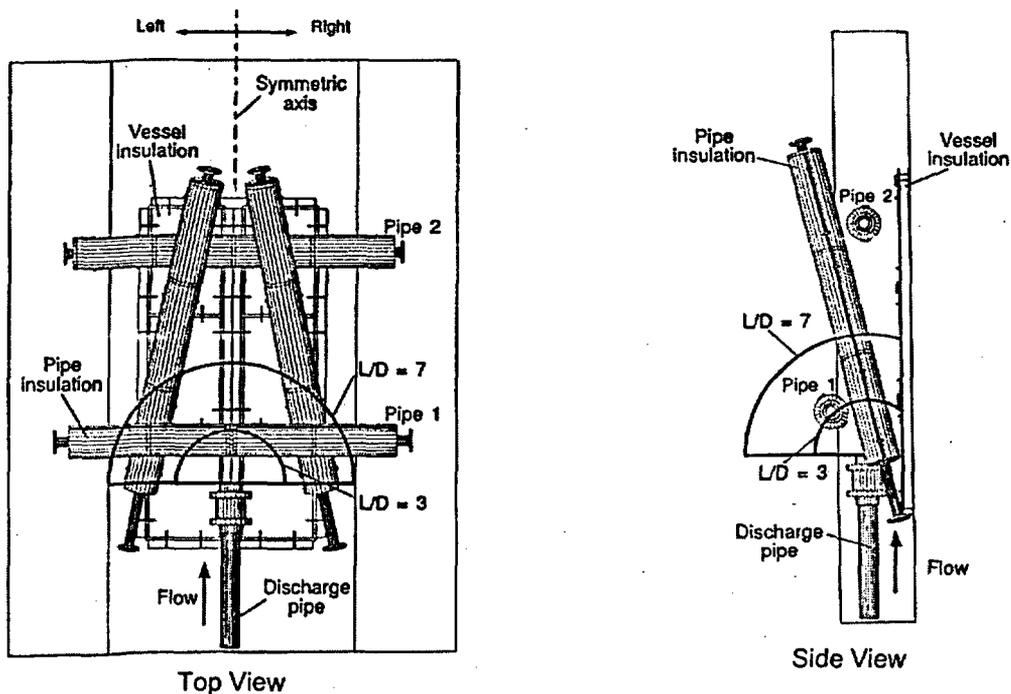


Figure 3-13 Configuration of the Target Field in the Battelle/KAEFER Tests<sup>3-20</sup>

the pipes were oriented perpendicular to the jet (one close to the break plane, the other farther away). The other two pipes were mounted at a slight angle to, and laterally offset from the jet centerline. The four target pipes were positioned so that insulation response could be observed at distances covering three ranges:  $L/D = 0$  to  $3$ ,  $L/D = 3$  to  $7$ , and  $L/D > 7$ . The test field also included an array of flat insulation that was located beneath the piping targets and installed flush onto the base of the test field. These flat insulation components were designed to represent vessel insulation assemblies. They were installed in two sections: one on the left-hand side of the test field and the other on the right hand side.

A total of four tests was performed with this arrangement. Each test involved a different combination of six types of insulating constructions on the piping and flat panel targets. The types of insulation studied were

- a stainless-steel RMI cassette,
- calcium-silicate in a steel cassette,
- a steel-jacketed Min-Wool blanket,
- steel-jacketed fiberglass,
- Min-Wool in a steel cassette, and
- fiberglass in a steel cassette.

In each test, a single type of insulating construction was installed on target locations on the left-hand side of the test field; a different type was installed on targets on the right-hand side. KAEFER Isoliertechnik GmbH manufactured all of the insulation.

The primary objective of the Battelle/KAEFER tests was to evaluate KAEFER insulation performance against the criteria described in US NRC Regulatory Guide 1.82,<sup>3-21</sup> not to study the amount or characteristics of resultant debris. As a result, the Battelle/KAEFER test report describes the experimental findings in terms of the extent of damage to installed insulation rather than describing the shape, size or other characteristics of the debris generated (i.e., the complement of "debris generation" data.) Figure 3-14 shows the damage to the test specimens typical of these experiments. Specifically, the post-test condition of the insulation target field is described in terms of two quantities.

- Per cent remaining in "as-fabricated" or as-installed condition
- Per cent destroyed or fragmented

These quantities are estimated for each piece of insulation installed in the various target locations and are expressed simply in terms of per cent of the original installed target component. The data sheets for each test also recorded qualitative observations of target insulation conditions. For example, the surface conditions of partially damaged components were noted (e.g., dented or punctured), the size of fissures (if any) in weld seams on the outer cassette structure were estimated, and the fraction of the component's core insulating material lost was estimated.

The following general observations were made from the data collected in these tests.

- The insulating construction with the poorest overall performance was the jacketed fiberglass blanket, with 68% of the target material in the field destroyed or severely damaged. The jacketed Min-Wool construction performed slightly better with ~44% damaged. All types of insulation encased in steel cassettes had lower levels of destruction than these two types.
- The extent of damage to targets in the test field was generally higher at locations close to the break plane (i.e.,  $3 < L/D < 5$ ) than at locations distant from the break plane ( $L/D > 5$ ). However, significant exceptions were noted. Tests with targets manufactured as steel cassettes often showed damage patterns in which the damage to near-field targets was lower than damage to targets at the mid- or far-field. One possible explanation for this unusual observation is collateral damage. That is, material stripped from targets near- or mid-field became projectiles that struck other targets downstream.
- The orientation of weld seams in steel cassettes relative to the axis of the steam jet was found to influence the amount of damage inflicted on this type of insulation. The cases in which damage levels to cassettes were high often correlated to conditions in which the jet impacted a weld seam and ripped open the cassette.
- The overall levels of damage observed for the flat-panel insulation installed at the base of the test field were not significantly different from those observed for pipe insulation (i.e., the same trends noted above

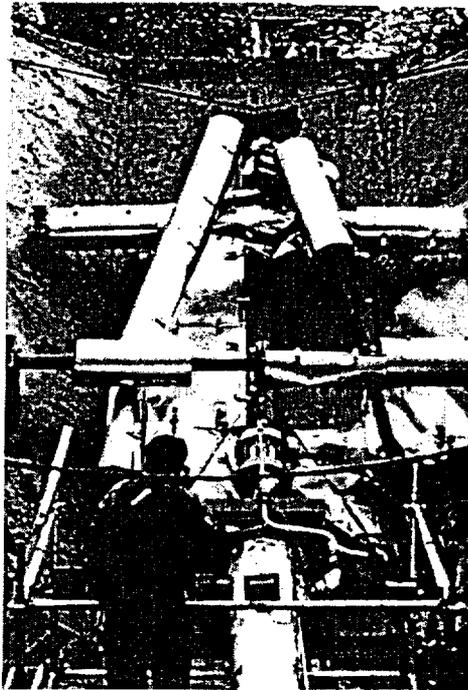


Figure 3-14 Typical View of Target Destruction in Battelle/KAEPER Tests<sup>3-20</sup>

apply equally well to piping and flat-panel installations.) However, after a flat-panel target located near the jet was damaged (i.e., ripped from its initial location), the damage appeared to propagate upward, removing subsequent pieces of insulation from the base of the target field. As a result, the flat targets either tended to remain intact or be removed completely.

### 3.3 Debris-Generation Models and Analytical Approaches

In Section 3.2, the test data described the minimum pressure at which various forms of insulation material would be dislodged from their installed locations and, to a lesser extent, the physical forms (shape and size) that the resulting debris would take. To use this information to characterize debris generation in a reactor containment, one must be able to first determine the forces (i.e., pressure field) surrounding a postulated break location.

Jet impingement forces resulting from stationary breaks in high-pressure piping have been measured experimentally<sup>3-22</sup> and calculated using models for isentropic expansion and flow

across shock discontinuities.<sup>3-8,3-9</sup> This information subsequently was used as a basis for designing piping systems and other structures within reactor containments to survive mechanical loads created by the two-phase effluent from postulated RCS piping breaks.<sup>3-23</sup> Another important application of this information was the development of a conceptual picture of the ZOI within which piping insulation might be affected by jet forces emerging from a postulated pipe break. The ZOI was described by a right-angle cone projected along the axis of the ruptured pipe, which was assumed to expand freely into unobstructed space. This model for characterizing the region of space where pressures would be higher than ambient and sufficient to inflict damage on component insulation is reviewed in Section 3.3.1.

Unfortunately, the idealized pipe-break configurations examined in experimental studies do not address the effects of pipe movement or jet deflection in a congested area. As a result, an alternative approach to defining the ZOI for estimating debris generation was developed in the evaluations of BWR suppression-pool strainer performance.<sup>3-2</sup> This model, which is referred to as the "spherical debris-generation

model" accounts for the effects of jet reflection and pipe motion by transforming the total energy within an idealized conical jet into an equivalent sphere that surrounds the break location. This model also has the advantage of not requiring information about the angular orientation of the rupture pipe in space to map out the volume within which insulation of a particular material/construction would be damaged. This model is described in Section 3.3.2.

### 3.3.1 Cone Models

#### 3.3.1.1 ANSI/ANS Standard

ANSI/ANS-58.2-1988<sup>3-23</sup> describes an analytical method for evaluating the geometry of a free-expanding jet. In addition to its basic purpose, which is to describe fluid forces on structures at various distances from a postulated pipe break, the basic mathematical model is the foundation of the conical ZOI used in Ref. 3-5.<sup>18</sup>

The model represents the free-expanding jet as a series of three regions, as shown in Figure 3-15. Region 1, which is described as the "jet core," represents the region of space immediately downstream of the break within which fluid striking an intervening object (target) would experience full recovery of the fluid stagnation pressure. This region is significant only for jets involving subcooled stagnation conditions. Region 2 extends from the end of the jet core to a distance downstream of the break, where the jet has expanded (in free, unimpeded space) to its asymptotic limit, i.e., isentropic expansion to near-ambient conditions. In practice, this means that the jet centerline pressure has decreased to less than twice the ambient pressure. In Region 3, the jet expands at a reduced rate and at an assumed angle of 10° to become fully equilibrated with ambient conditions.

The distance to the asymptotic plane from the break ( $L_a$ ) and the cross-sectional area of the jet at the asymptotic plane ( $A_a$ ) are calculated relative to the equivalent dimensions at the break plane; i.e., the break diameter  $D_b$  and

<sup>18</sup> A number of experimentally based empirical correlations for jet expansion exist in the literature. Although these correlations may predict the data on which the correlations are based adequately, extreme care must be taken in extrapolating those correlations to other pipe-break configurations, sizes, pressures, etc.

break area  $A_b$  with the formulas listed in the right-hand side of Figure 3-15.

The diameters of the jet in Regions 2 and 3 (relative to the break diameter  $D_b$ ) are calculated as follows.

Region 2:

$$\frac{D_j}{D_b} = \sqrt{C_T \left[ 1 + \frac{L}{L_a} \left( \frac{A}{C_T A_a} - 1 \right) \right]}$$

and

Region 3:

$$\frac{D_j}{D_b} = \sqrt{\frac{A_j}{A_b}} = \sqrt{\frac{A_j A_a}{A_b A_a}} = \left[ 1 + \frac{2(L - L_a)}{D_b} \tan 10^\circ \right] \sqrt{\frac{A_a}{A_b}}$$

where  $L$  = distance away from the break place at which the jet diameter is  $D_j$ .

In addition to determining the overall dimensions of the jet, applying the ANSI/ANS model to estimate debris generation requires information regarding the geometry of the isobar within the jet that encloses the region of space where pressures exceed a particular damage pressure. This region of space is shown in Figure 3-16 and is described by the following expressions.

The pressure at any distance downstream of the break plane ( $L$ ) and distance away from the jet centerline ( $D_x$ ) is calculated as follows.

Region 2:

$$\frac{P_x}{P_c} = \left( 1 - \frac{D_x}{D_j} \right) \left\{ 1 - 2 \frac{D_x}{D_j} \left[ 1 - 3C_T \left( \frac{D_b}{D_j} \right)^2 \left( \frac{P_o}{P_c} \right) \right] \right\}$$

and

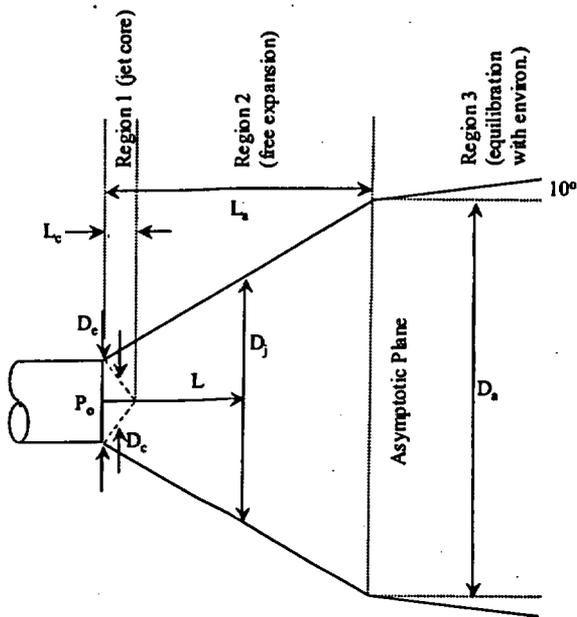
Region 3:

$$\frac{P_x}{P_c} = 1 - \frac{D_x}{D_j}$$

where the pressure along the jet centerline ( $P_c$ ) is

Region 2:

$$\frac{P_c}{P_o} = F_c - \left[ F_c - 3C_{Te} \left( \frac{D_b}{D_a} \right)^2 \right] \frac{\left( 1 - \frac{L_c L_a}{L_a L_L} \right)}{\left( 1 - \frac{L_c}{L_a} \right)}$$



$$\frac{L_a}{D_c} = \frac{1}{2} \left( \sqrt{\frac{A_e}{A_c}} - 1 \right)$$

$$\frac{A_e}{A_c} = \left( \frac{G_{crit}^2}{g_c \rho_{me} C_T P_o} \right)$$

$$\rho_{me} = \frac{1}{\frac{\chi_o}{\rho_g} + \frac{(1-\chi_o)}{\rho_l}}$$

where:  $\rho_{f,x}, \chi$  are evaluated at  $P_x$

$$\frac{P_x}{P_{amb}} = 1 - 0.5 \left( 1 - \frac{2P_{amb}}{P_o} \right) f(h_o)$$

$$f(h_o) = \begin{cases} \sqrt{0.1 + \left( \frac{h_o - h_f}{h_{fg}} \right)} & \text{for } \left( \frac{h_o - h_f}{h_{fg}} \right) > -0.1 \\ 0.0 & \text{for } \left( \frac{h_o - h_f}{h_{fg}} \right) < -0.1 \end{cases}$$

where:  $G_{crit}$  = break flow rate (mass flux)  
 $\rho_{me}$  = mixture density at asymptotic plane  
 $\rho_g, \rho_l$  = saturated vapor, liquid density  
 $C_T$  = thrust coefficient  
 $P_o$  = stagnation pressure  
 $\chi$  = mixture vapor mass fraction (quality)  
 $h_o, h_f$  = stagnation, saturation liquid enthalpy

Figure 3-15 ANSI/ANS Standard Free-Expanding Jet Model

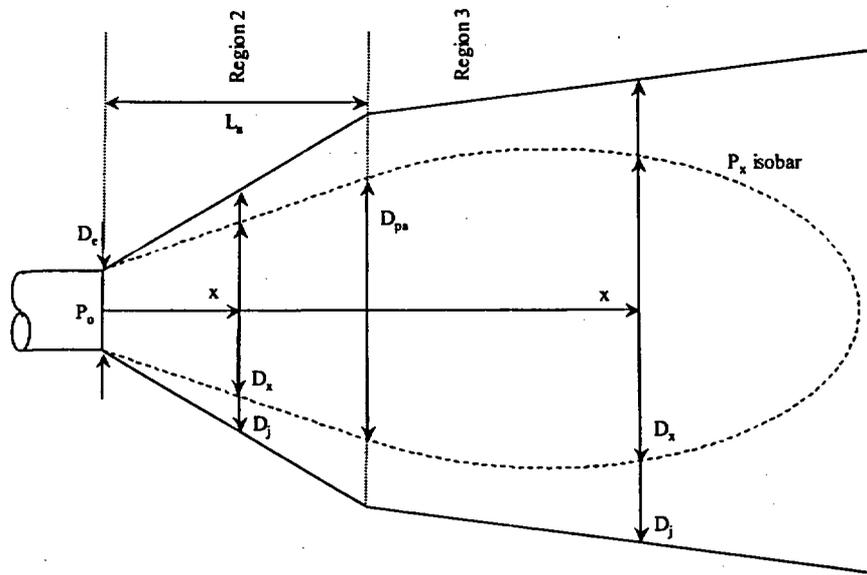


Figure 3-16 Isobar of Damage Pressure  $P_x$  within a Fixed, Free-Expanding Jet

where

$$F_c = \begin{cases} 1.0 & \text{for } \left(\frac{D_j}{D_o}\right)^2 \leq 6C_T \text{ at } L = L_c \\ 6C_T \left(\frac{D_o}{D_j}\right)^2 & \text{for } \left(\frac{D_j}{D_o}\right)^2 > 6C_T \text{ at } L = L_c \end{cases}$$

Region 3:

$$P_x = 3P_o \frac{A_j}{A_o}$$

At any distance away from the break plane, the diameter of the volume defined by an isobar of a fixed pressure ( $P_x$ ) can be calculated by solving the above equations for  $D_x$ . The result is

Region 2:

$$\frac{D_x}{D_j} = \frac{1}{4A} \left[ (2A+1) - \sqrt{(2A+1)^2 - 8A \left(1 - \frac{P_x}{P_o}\right)} \right]$$

where

$$A = \left[ 1 - 3C_{T_o} \left(\frac{D_o}{D_j}\right)^2 \left(\frac{P_{o_o}}{P_o}\right) \right]$$

Region 3:

$$\frac{D_x}{D_j} = 1 - \frac{P_x}{P_o}$$

### 3.3.1.2 Three-Region Conical Jet<sup>3-5</sup>

A variant of the three-region conical-jet expansion model was proposed in NUREG-0897 to describe the varying degrees of damage inflicted on insulation material, with distance away from the break, by the initial shock wave and subsequent mechanical erosion. The model did not calculate the pressure distribution within the free-expanding jet explicitly but described the distance downstream of the break plane at which the level of material damage decreased from "total destruction" (Region 1) to "high levels of destruction" (Region 2) to "dislodged, as-fabricated pieces" (Region 3). The distance away from the break plane at the interface between these regions was described in terms of the number of break diameters (L/D) as shown in Figure 3-17.

The boundaries of the three regions represented in this model were based on calculations of two-dimensional pressure distributions (similar to those described for the ANSI/ANS standard). The following significant findings were derived from the calculations and reported.<sup>3-5</sup>

1. "Target pressure loadings increase asymptotically at L/D's less than 3.0 to break exit pressures. At L/D's less than 3, survivability of insulation materials is highly unlikely.
2. At L/D's from 5 to 7, the centerline stagnation pressure becomes essentially constant at approximately  $2 \pm 1$  bars.
3. The multidimensional pressure field loads the target over a large region; this region may be approximated by a 90° jet cone expansion model. A hemispherical expansion model could be another approximation for this expanding pressure field. These two-dimensional calculations do not support the use of the Moody jet model (a narrow cone) for targets close to the break locations."

Experiments performed in the HDR facility (see Section 3.2.2.2) formed the primary basis for connecting the two-phase pressure distributions calculated with the conical jet expansion model to observation of insulation damage. Sufficient experimental data were not available at the time that NUREG-0897<sup>3-5</sup> was published to quantitatively distinguish "high levels of destruction" in Region 2 from either of its two neighbors. However, the following qualitative description of damage was offered.

... it appears that [in Region 2] the RMI debris could consist of damaged inner foils and damage assemblies or components that were the result of further LOCA damage. Experimental data available for fibrous insulations indicate that shredding and damage can extend into Region 2, with such damage decreasing with distance from the jet. However, if the 'inner core' of fibrous insulation is exposed to the break jet (as would occur if the cover blanket were breached), blowdown transport of this material would be expected to extend for distances much greater than 7 L/D's.

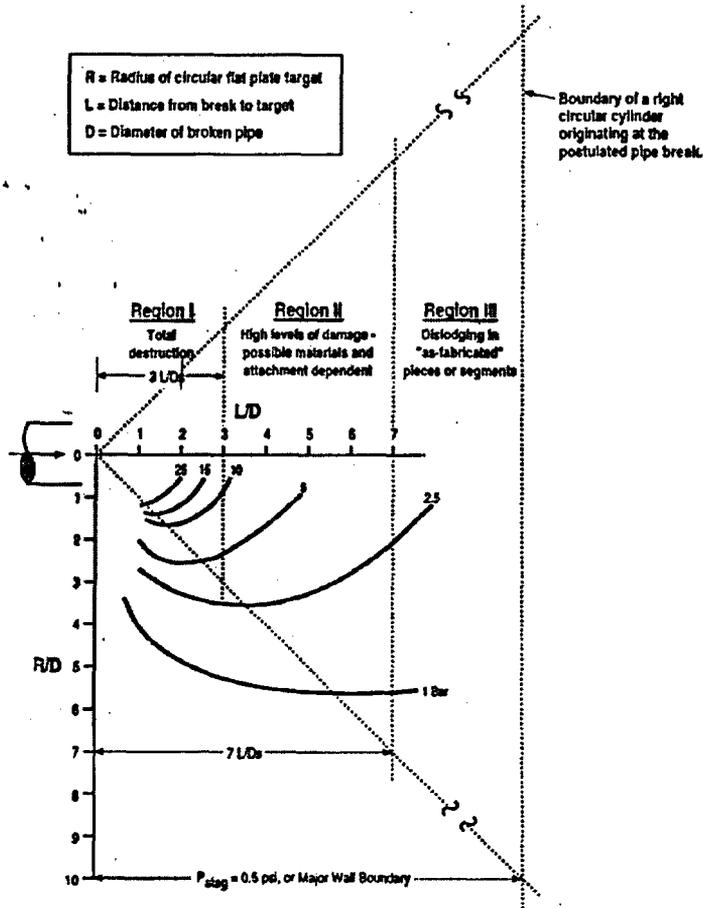


Figure 3-17 Illustration of the Three-Region, Two-Phase Conical-Jet ZOI Model<sup>3-9</sup>

### 3.3.2 Spherical Models

#### 3.3.2.1 Three-Region Spherical Model<sup>3-2</sup>

A major limitation of the conical model is the inherent assumption that pipe separation and offset at the location of the break are fixed in space. That is, movement of the break plane(s) is not taken into account explicitly. The ANSI/ANS standard<sup>3-23</sup> acknowledges this limitation by stating that adjustments to the model are necessary to properly account for movement of the break plane(s) and/or reflection of the jet by intervening structures. In particular, the ANSI/ANS Standard states:

"Regardless of the fluid jet model used to determine affected structures and components, engineering judgment shall be applied in determining whether the jet will impinge upon a given target. The geometry

of the jet cannot be perfectly defined for all of the various fluid conditions under today's state of the art ... Neither can the movement of the ruptured pipe, thus the jet centerline, be defined with complete accuracy."

Also,

"The movement of the jet centerline due to pipe whip shall be taken into account in the characterization of jet impingement loads on a target."

The so-called "three-region, spherical model" for characterizing the ZOI at a particular break location was developed to address uncertainties in break-plane movement and jet reflection.<sup>3-2</sup> The three-region, spherical model is illustrated in Figure 3-18.

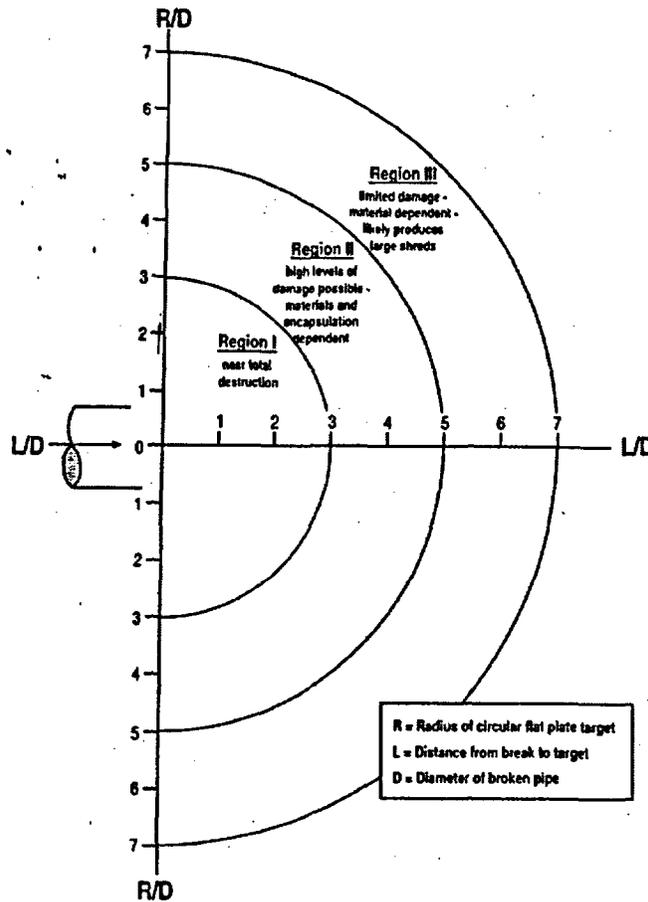


Figure 3-18 Illustration of the Three-Region, Two-Phase Spherical ZOI Model<sup>3-2</sup>

As in the three-region cone model, the degree of damage decreases from Region 1 to Region 2 to Region 3. The extent of damage (i.e., the size distribution of insulation fragments) is based on experimental observations of target material impacted by stationary jets at varying distances from the break plane. For example, the experimental observations summarized in Section 3.2 clearly indicate that the fraction of insulation reduced to small fragments is much less for steel-jacketed fibrous pillows than for unjacketed fiber blankets. In the NRC's evaluation of BWR suppression-pool strainers,<sup>3-2</sup> such differences were handled through the use of "destruction factors." For example, destruction factors of 0.75, 0.60, and 0.40 were used to represent the fraction of steel-jacketed Nukon<sup>®</sup> reduced to a sufficiently small size to be transported by blowdown forces from the drywell

to the wetwell of a BWR Mark I containment. Different values were used for other types of insulation.

### 3.3.2.2 Equivalent-Volume Sphere Model

An alternative approach to distorting the conical ZOI sphere is the so-called "equivalent-volume" sphere model. This model couples the ideas (from Section 3.3.1.1) of a conical isobar within which pressures exceed a particular damage pressure with a spherical shape to capture the major effects of break-plane movement and jet reflection. A version of this model initially was proposed by the BWROG as one of three possible methods for estimating quantities of debris generation.<sup>3-3</sup> The basic approach has five essential steps.

1. Determine the damage or destruction pressure ( $P_{dest}$ ) for an insulating construction of interest.
2. Determine the total volume of space swept out by the conical isobar defined by the damage pressure (i.e.,  $P_x = P_{dest}$  in Section 3.3.1.1).
3. Convert the total volume within the isobar to a sphere of radius  $R$ .
4. Place the origin of the sphere at a specific, postulated break location and determine the total quantity of insulation of the selected type that is within the sphere.
5. Move the origin of the sphere to all other candidate break locations and repeat the exercise.<sup>19</sup>

The radius of the equivalent sphere is a function of the damage pressure (unique to each type of insulating construction), the diameter of the pipe where the break is assumed to occur, and the fluid medium within the pipe (i.e., steam vs water).

In the BWROG method, multipliers or correction factors were applied to this basic method to account for destruction factors less than 1.0. The NRC's evaluation of this method determined the general approach to be acceptable for insulating construction with low characteristic damage pressure (Ref. 3-4, Appendices B, C, D, F, G, and K). However, for insulations with high damage pressure, the staff recommended that licensees develop the equivalent sphere on the basis of target-area-average pressures instead of the jet centerline pressures.

<sup>19</sup> Computer programs have been developed to calculate the volume of insulation inside the ZOI for all potential break locations within a containment systematically. For example, the volunteer plant assessments performed as part of the NRC's parametric evaluation of recirculation sump performance used the CASINOVA program to perform these computations.<sup>3-11</sup> This program has the ability to vary the ZOI for each type of material near a particular weld (i.e., the ZOI associated with the damage pressure for a particular material) and to evaluate all high-energy welds systematically. The systematic analysis provides a spectrum of potential insulation debris volumes by insulation type that can be used to determine the size a screen capable of handling the potential debris load to the recirculation sump screens.

### 3.3.3 Debris-Size Distribution as a Function of Local Jet Pressure

All insulation located within the ZOI generally is assumed to be damaged to some extent. The extent of damage could range from the total destruction of a blanket (or RMI cassette) with all of its insulation turned into debris of very small dimensions to the blanket/cassette being only slightly damaged and even remaining attached to its piping. Available debris-generation tests clearly indicate that the extent of damage (i.e., the size distribution of resulting debris fragments) depends strongly on the magnitude of the jet forces in the immediate proximity to individual insulation components. Qualitatively, increasing the local jet forces (i.e., increasing local stagnation pressures) tends to produce higher fractions of small debris fragments.

The size distribution of debris formed from insulation targets located within the ZOI can be determined only by combining measurements of debris-size distribution with measurements (or analytical estimates) of local stagnation pressure. Unfortunately, the quantitative relationship between the distribution of debris fragment size and local jet pressure has not been investigated thoroughly. Most reports of experimental work on debris generation document the size distribution of resultant debris fragments along with the initial location of the insulation target but do not measure, or estimate, the local jet stagnation pressure. This extension of test data is left to others to develop by applying one of the models described in Section 3.3.1 or 3.3.2. This gap in the published knowledge base on debris generation is being addressed in an ongoing NRC study of PWR recirculation sump performance for a "volunteer plant." The results of this work are anticipated in early 2003. The general method being used to correlate debris size(s) to local jet pressure in the volunteer plant analysis is summarized below.

Using the spherical ZOI damage model, the fraction of insulation of type- $i$  that is reduced to debris within a particular size bin is given by the following integration:

$$F_i = \frac{3}{r_{ZOI}^3} \int_0^{r_{ZOI}} g_i(r) r^2 dr$$

where

- $F_i$  = the fraction of debris of type-i within a particular size bin,
- $g_i(r)$  = the damage distribution for of debris type-i,
- $r$  = the radius from the break in the spherical ZOI model, and
- $r_{ZOI}$  = the outer radius of the ZOI.

The volume associated with a particular level of damage is determined by estimating the volume within a particular isobar within the jet (i.e., any insulation located within this isobar would be damaged to the extent, or greater, associated with that pressure). As described in Section 3.3.2.2, the equivalent-volume sphere model can be used to convert this volume to an equivalent spherical volume with an origin at the break plane. Hence, the debris-size distribution can be associated with a particular spherical radius [i.e.,  $g_i(r)$ ]. The distribution would be specific to a particular kind of insulation, jacketing, jacketing seam orientation, and banding.

The difficulty associated with this evaluation is the limited database for insulation debris generation. Examples of debris generation data that include debris-size information that can be correlated to local jet pressure include the BWROG AJIT tests (Section 3.2.1.2) and the OPG steam/water debris generation tests (Section 3.2.2.5). However, when these data are subjected to the above integration, sufficient data points are not available to fully characterize the damage distribution function [ $g_i(r)$ ]. For example, the BWROG data for DPSC Mirror<sup>®</sup> stainless-steel RMI, which was found to be damaged at jet pressures as low as 4 psi, indicates the size distribution shown in Figure 3-19 when the insulation is installed with standard bands.<sup>20</sup>

Although these data may be suitable for describing the extent of cassette damage in the outer reaches of the ZOI, they do not describe debris generated at locations closer to the break, where the cassette would be subject to substantially higher local stagnation pressures. Information at very high local pressures can be gleaned from limited data collected in the Siemens-Karlstein tests (Section 3.2.2.4).

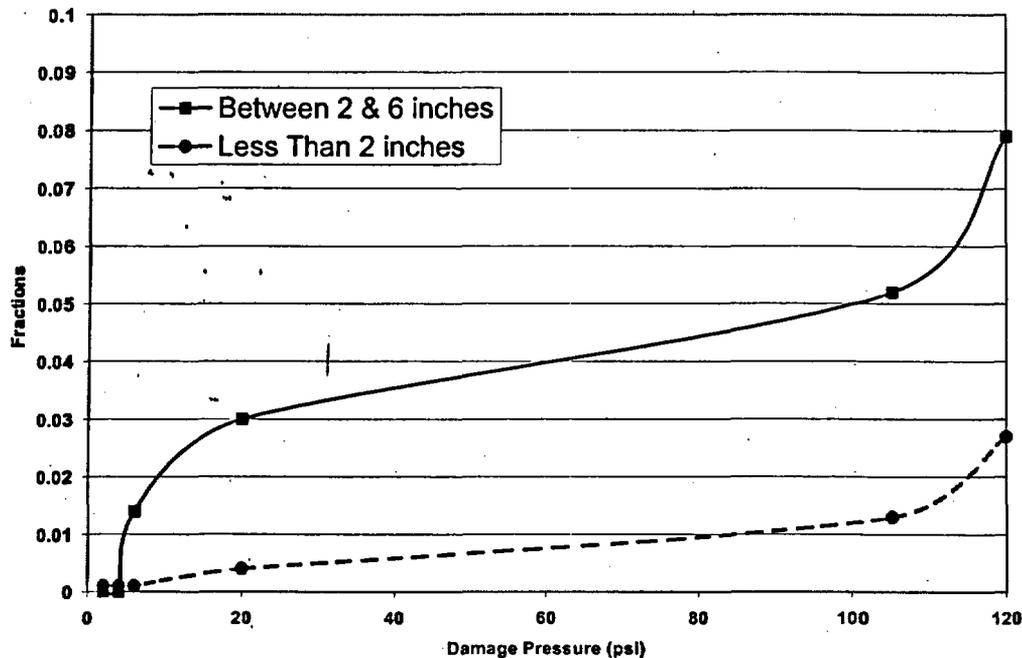
<sup>20</sup>Distributions developed using most conservative applicable data points.

These tests included measurements of RMI destruction when a cassette was mounted directly in front of the break plane. Under such conditions, the cassette was reduced to small shreds, with a majority of the pieces characterized as smaller than 2-in. (see Figure 3-7.) Unfortunately, no data are available for the damage of this type of insulation at local pressures between 120 psi and approximately 1000 psi. Given the combined body of data, the ZOI integration for small (< 2-in.) debris fragments of stainless-steel RMI can be made by conservatively assuming that insulation of this type subjected to jet pressures greater than 120 psi becomes debris smaller than 2 in.

Similar exercises can be performed for other types of insulation. However, there are gaps in quantitative measurements of debris size with variable local pressure (i.e., position relative to the break plane) for all types of debris. Consequently, conservative assumptions regarding debris size often are used to characterize quantities of transportable debris.

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**Figure 3-19 Debris Size as a Function of Local Jet Pressure**  
 (Applicable Only to DPSC SS Mirror® Insulation Based on Available Data)

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## 4.0 AIRBORNE/WASHDOWN DEBRIS TRANSPORT IN CONTAINMENT

Section 4 summarizes the available knowledge regarding transport of insulation debris within the containment from its location of origin to the containment sump pool. The transport of insulation debris would be caused first by the effluences from a high-energy pipe break that would not only destroy insulation near the break, but also would transport that debris throughout the containment, i.e., airborne debris transport. If the break effluences were to pressurize the containment sufficiently to activate<sup>1</sup> the containment spray system to suppress pressurization, the transport of insulation debris would also be driven by the drainage of spray water from the spray heads to the recirculation sump, i.e., washdown debris transport. The knowledge base associated with insulation debris transport is organized in the following subsections.

- Section 4.1 presents an overview of the mechanics associated with airborne/washdown debris transport, including the characteristics of an accident relevant to debris transport, the relevant plant features, the physical processes and phenomena, and the debris characteristics affecting transport.
- Section 4.2 describes the testing relevant to airborne/washdown debris transport that has been performed.
- Section 4.3 describes the analyses relevant to airborne/washdown debris transport that have been performed.
- Section 4.4 summarizes the analytical approaches developed to predict the transport of insulation debris.
- Section 4.5 discusses the basic "rules of thumb" observed during testing and analytical studies.

The phenomena associated with airborne and washdown debris transport is also discussed. These phenomena include the following:

- How substantial quantities of airborne debris in motion would come into contact with

<sup>1</sup>The spray system would activate if the containment pressure exceeded the system-activation setpoint. The pressurization of the containment is plant- and accident-scenario-dependent (e.g., the size of the break).

containment structures and equipment and be deposited onto these surfaces.

- How debris would settle gravitationally onto equipment and floors as depressurization flows slow down.
- How airborne debris (usually very fine) would be washed out of the air by the spray droplets except in areas not covered by the sprays.
- How the impact of these sprays onto surfaces and the subsequent drainage of the accumulated water would wash deposited debris down toward the sump pool.
- How containment sprays may degrade insulation debris further through the process of erosion, thereby creating even more of the very fine and most transportable debris.
- How the analysis of debris transport in the containment depends on the type and characteristics of the debris generated by the break (discussed in Section 3).

The containment transport analyses (above the sump pool) provide a description of the debris entering the sump pool in terms of the type of debris, where the debris enters the pool, and when the debris enters the pool. Section 5 discusses the transport of debris within the sump pool. A majority of the testing and analysis relevant to airborne/washdown insulation debris transport was performed to support the suction-strainer-clogging issue for BWRs; however, most of this research is also directly applicable to PWRs. The applicability of BWR research to PWRs is discussed as appropriate.

It also should be noted that debris-transport research has tended to focus on the transport characteristics of fibrous insulation debris. Research has also considered other types of insulation debris, notably experimental RMI debris research, but the potential for fibrous insulation debris to clog a strainer generally has been found to be substantially greater for fibrous debris than for RMI debris. Further research has tended to focus on LDFG over the other types, e.g., HDFG or mineral wool fibrous debris. Therefore, there are gaps in the completeness of debris-transport research.

## 4.1 Overview of Mechanics

The transport of debris within a PWR would be influenced by both the spectrum of physical processes and phenomena and the features of a particular containment design. Because of the violent nature of flows following a LOCA, insulation destruction and subsequent debris transport are chaotic processes. For example, a piece of debris could be deposited near the sump screen directly or it could take a much more tortuous path—first going to the dome and then being washed by the sprays back down to the sump. A piece of debris could also be trapped in any number of locations. Debris-transport analysis includes the characterization of the accident, the design and configuration of the plant, the generation of debris by the break flows, and both airborne and waterborne debris-transport dynamics.

The NRC convened a panel of recognized experts with broad-based knowledge and experience to apply the Phenomena Identification and Ranking Table (PIRT) process to the transport through a PWR containment of debris generated by a high-energy pipe break.<sup>4-1</sup> The PIRT process was designed to identify processes and phenomena that would dominate debris-transport behavior. Further, these processes and phenomena were prioritized with respect to their contributions to the reactor phenomenological response to the accident scenario. The NRC also convened a PIRT panel to rank transport processes relative to debris transport within a BWR drywell.<sup>4-2</sup>

This section specifically discusses:

- the characteristics of postulated accident scenarios relevant to the transport of insulation debris (Section 4.1.1),
- the plant features that would affect transport of insulation debris (Section 4.1.2),
- the physical processes and phenomena that affect transport of insulation debris (Section 4.1.3), and
- the characteristics of insulation debris that affect its transport (Section 4.1.4).

### 4.1.1 Accident Characterization Relevant to Debris Transport

Long-term recirculation cooling must operate following the range of possible LOCA accident

scenarios and non-LOCA accident scenarios (e.g., a main steam line break). A comprehensive debris-transport study should consider an appropriate selection of these scenarios. The maximum debris transport to the screen likely will be determined by a small subset of accident scenarios, but this scenario subset should be determined systematically. Many important debris-transport parameters will depend on the accident scenarios.

Perhaps the most important aspect of the accident scenario in regard to debris transport in the containment is the size of the break, which is usually specified as a small, medium, or large LOCA. The break size influences the debris transport in a number of ways:

- The size of the break largely determines the dynamics within the containment of the resultant primary system depressurization. The primary system depressurization period usually is referred to as the blowdown phase. Blowdown dynamics determine transport velocities and flow qualities within the containment, which in turn affect the mechanisms for debris deposition onto structures.
- The size of the break also affects the timing of the accident sequence, i.e., the completion of the blowdown phase, the ECCS injection phase, and the time when the recirculation pumps start to pump water from the sump (recirculation phase). The injection phase corresponds to ECCS injection into the primary system that subsequently establishes the sump pool. The recirculation phase refers to long-term ECCS recirculation.
- The size of the break can also determine whether the containment sprays activate. For large breaks, the sprays likely would activate almost immediately, whereas with a smaller break, the containment pressure rise may not be sufficient to initiate the sprays.
- The size of the break would determine the pumping flow rate from the sump in that the pump flow rate would be limited by the rate of flow from the break after the vessel inventory was replaced.

Debris transport would be affected by the location and size of the break. The location of the break, along with the general design of the containment, determines the patterns of flow throughout the containment. It affects flow

dynamics, how and where debris impacts structures, whether debris would be transported away from the sump or toward the sump, etc. The location of the break relative to the piping insulation would affect the type of debris being transported (refer to Section 3). The location of the break would also affect the sump-pool flow dynamics near the recirculation sump (refer to Section 5).

#### 4.1.2 Plant Features Affecting Debris Transport

A number of features in nuclear power plant containments would significantly affect the transport of insulation debris. These features include the containment's engineered safety features and associated plant operating procedures. Perhaps the most significant containment feature is the containment pressure-suppression system. In a BWR plant, the primary pressure suppression system is its suppression pool and the containment sprays. In a PWR plant, the relatively large free volume functions to keep pressure from becoming excessive, thus, the large free volume is essentially a pressure-suppression system. The containment sprays also help keep pressure from becoming excessive. The containment size was reduced in ice-condenser plants because of their banks of ice, which would condense steam effectively, and in sub-atmospheric plants, where the operating pressure inside the containment is below atmospheric pressure. The most significant difference between PWR and BWR containments with respect to debris transport is the pressure-suppression system, other than the sprays, and its location relative to the postulated break. In BWR containments, the break effluences would flow down toward the suppression pool via downcomer vents, i.e., toward the ECCS suction strainers. In PWR containments, the break effluences would tend to flow generally up toward the large free volume of the containment dome, i.e., away from the ECCS sump screens. For example, in ice-condenser containments, the containment was designed to direct the break flows through the ice banks, which exit into the dome. These flows also would carry the insulation into these regions. This means that for PWR plants, substantial quantities of debris would be propelled away from the lower regions of the

containment and toward the higher regions<sup>2</sup> of the containment. If it were not for the containment sprays washing the debris down toward the recirculation sump, the debris carried aloft likely would remain in the higher reaches of the containment.

The flow propelling debris upward in the containment could be channeled through relatively narrow passageways in some containment designs, such as an ice condenser bank, where substantial portions of the debris entrained within the flow likely would be deposited inertially within the channel. Such an effect could provide a means for analytically determining a quantity of debris that would not likely subsequently transport downward to the sump. Other structural features would capture debris as it was propelled past the structure. These structures include gratings, piping, and beams.

After the airborne debris is dispersed throughout the containment, the washdown of that debris to the recirculation sump would be determined primarily by the design of the containment spray system, including the drainage of the sprayed water. First, the spray droplets would tend to sweep any remaining airborne debris out of the containment atmosphere, and then the falling droplets would wash debris off surfaces (structures, equipment, walls, floors, etc.). As the drainage water worked its way downward, entrained debris would move along with the flow. However, not all debris would be washed off surfaces and entrained, and the containment sprays may not cover substantial areas within the containment.

Containments are designed, in general, to readily drain the spray water to the sump to minimize water holdup and maximize sump water levels. However, the refueling pools could hold up substantial quantities of water if the pool drains are not open or are blocked by debris. Thus, the design of the refueling pools, including the pool drainage system, can be an important containment feature in regard to debris transport.

The locations where spray drainage enters the sump pool relative to the location of the

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<sup>2</sup>This effect would be lessened somewhat when the pipe break was located higher up in the containment, such as in a main steam line.

recirculation sump are also important. Debris deposited into the pool well away from the recirculation sump would be less likely to transport to the sump screen than debris that was deposited near the sump. Debris transport within the sump pool depends on a number of plant features, including the lower compartment geometry that defines the shape and depth of the sump pool, such as the open floor area, ledges, structures, and obstacles within the pool. In addition, the relative locations of the sump, the LOCA break, and the drainage paths from the upper reaches of the compartment to the sump pool are important to determining pool turbulence, which, in turn, determines whether debris can settle in the pool.

#### 4.1.3 Physical Processes and Phenomena Affecting Debris Transport

Of the full spectrum of physical processes and phenomena that would affect the transport of debris from its source to the sump pool, a subset has been identified that should be considered the most important in debris-transport analysis. These include thermal-hydraulic processes that contribute to the transport and/or deposition of the debris and the debris deposition

mechanisms. Further, these processes and phenomena can be grouped according to transport phase, i.e., the airborne dispersion by the depressurization flows and the subsequent washdown of dispersed debris by the containment sprays. These processes and phenomena are listed in Table 4-1 and described in Tables 4-2 through 4-5.

The complete range of thermal-hydraulic processes affect the transport of insulation debris. Furthermore, the containment thermal-hydraulic response to a LOCA includes most forms of thermal-hydraulic processes. Debris transport is affected by a full spectrum of physical processes, including particle deposition and resuspension for airborne transport and both settling and resuspension within calm and turbulent water pools for both buoyant and nonbuoyant debris. The dominant debris-capture mechanism in a rapidly moving flow likely would be inertial capture, but in slower flows, the dominant process likely would be gravitational settling. Much of the debris deposited onto structures likely would be washed off the structures by containment sprays or possibly even by condensate drainage. Other debris on structures could be subject to erosion.

Category	Airborne Debris Transport	Washdown Debris Transport
Thermal-Hydraulic Processes and Phenomena Affecting Debris Transport	Pressure-Driven Flows Localized Flow Fields Turbulence Liquid Flashing Entrained Liquid Liquid Impaction on Surfaces Surface Condensation Condensation on Debris Sheeting Flow Dynamics	Containment Spray Droplet Fallout Spray Droplet Accumulation Floor Drainage of Accumulated Spray Pool Formation (Other than Sump) Spray Drainage Runoff Break Deluge Ice Melting in Ice Condenser Plant
Debris-Transport Mechanisms	Debris Advection Disintegration Debris Entrapment (Deposition) Gravitational Settling Inertial Impaction Turbulent Impaction Diffusiophoresis Adhesion Resuspension	Spray Droplet Sweepout of Debris Surface Reentrainment of Debris Deluge Transport Accumulation of Entrained Debris Drain Blockage by Debris Pool Entrapment of Debris Debris Erosion (Disintegration)

<b>Table 4-2 Thermal-Hydraulic Airborne Processes and Phenomena</b>	
<b>Processes and/or Phenomena</b>	<b>Description</b>
Pressure-Driven Flows	The bulk flows, i.e., the net or macroscopic flow characteristics of the containment atmosphere. These flows would be the carriers of the debris. System-level thermal-hydraulic codes can predict these bulk flows reasonably well.
Localized Flow Fields	Flow directions and/or velocities that differ from the bulk atmosphere flow characteristics because of localized geometries. Localized flow fields would be most pronounced in the region near the break, where the depressurization jet is expanding and being redirected by structures, equipment, and walls. The flows can be extremely dynamic in this region. Predictions of these localized flow fields likely would require sophisticated CFD code analyses.
Turbulence	Local fluid vortices or flow eddies created by flow around obstacles. These vortices and flow eddies provide locations where debris potentially could settle even though bulk conditions would not predict settling. However, the locations could be transient such that settled debris could be reentrained.
Liquid Flashing	Liquid-to-vapor phase transformation caused by expansion across a choked break plane.
Entrained Liquid	Flow of break fluid that does not flash but continues as a liquid stream that would wet walls impacted by the stream and form pools as the water accumulates on the floor.
Liquid Impaction on Surfaces	Liquid impacting a surface (either entrained liquid or falling water droplets) that would wet that surface, thereby forming a liquid film on the surface. The liquid film would subsequently enhance debris capture by that surface. Debris-transport testing has shown surface wetting to greatly enhance debris deposition.
Surface Condensation	Formation of a liquid film on structure surfaces as a result of condensation of steam from the atmosphere would also wet surfaces. The rate of condensation depends on the rate of heat transfer into a structure, as well as on the moisture content of the atmosphere.
Condensation on Debris	Steam condensation onto debris in general would increase the weight of the debris, thereby enhancing the gravitational settling of that debris.
Sheeting Flow Dynamics	A dynamic sheet of water could be driven across a surface of any orientation by impaction of a liquid stream. This stream could entrain and transport debris already deposited onto that surface. Sheeting would most likely occur because of flows from the break. Before forming a sump pool, the initial break flows to the sump floor would transport debris already deposited on the sump floor (See Section 5).

Table 4-3 Airborne Debris-Transport Mechanisms	
Processes and/or Phenomena	Description
Debris Advection	Transport of airborne debris within the carrier-gas medium by flows at the spectrum of scales from bulk to turbulent eddies.
Disintegration	<p>Further destruction of debris as a result of debris impacting a structure, debris impacting debris, or liquid impacting debris. The most significant aspect of this secondary destruction is the generation of finer debris, such as individual fibers from fibrous insulation, because fine debris was found to readily transport from both the upper reaches of the containment by the containment sprays and within the sump pool. Further, this fine debris forms a thin uniform layer across the entire sump screen, threatening blockage through what has been called a "thin bed effect." Thus, a relatively small amount of disintegration could have a significant effect on screen blockage. Erosion of fibrous debris by falling water and within a turbulent pool has been seen experimentally.</p> <p>The opposite of disintegration, i.e., agglomeration, where debris pieces combine into larger pieces, was not observed during airborne debris-transport testing.</p>
Debris Entrapment (Deposition)	One mechanism or another would eventually trap debris undergoing airborne advection. Debris could be removed directly from the flow stream or through simple fallout of the atmosphere after depressurization completed. These mechanisms are listed next in this table.
Gravitational Settling	Downward relocation (sedimentation) of debris in the containment atmosphere onto structure surfaces under the force of gravity. Gravitational settling becomes an effective deposition mechanism after the bulk flow slows sufficiently so that gravity causes debris to fall faster than flow turbulence can keep the debris in suspension. Thus, gravitational settling would occur in regions well away from the break, where the break flow has dispersed, and after the depressurization completes (post-blowdown).
Inertial Impaction	Capture of debris particles on structure surfaces because of inertially driven impaction. Airborne-debris transport testing has demonstrated that inertial impaction is an effective form of deposition whenever flows are rapid and surfaces are wetted. Substantial debris was found to be deposited onto a grating whenever test flows passed through wetted grating onto miscellaneous structures such as I-beams and pipes, and onto to flat surfaces when the flow was forced through a sharp bend. This type of debris deposition would be most effective in the region of the break or along the flow pathway from the break to the larger upper dome.
Turbulent Impaction	Capture of debris on structural surfaces caused by turbulent eddies. Although this form of debris deposition would occur, its importance is much less than deposition by inertial impaction and by gravitational settling. Also, turbulent impaction would be more effective on very fine debris than on larger debris.
Diffusiophoresis	Transport of debris particles toward deposition surfaces because of the concentration gradients of the atmosphere contents. Following a LOCA, the gradient is dominated by steam concentration gradients created by condensation on containment structures. This form of deposition is also secondary to deposition by inertial impaction and gravitational settling.
Adhesion	Permanent retention of debris particles on a structure surface as a result of mechanical interactions with a rough surface or other forces. The flow velocities would be insufficient to remove the debris from the surface again.
Resuspension	Reentrainment of debris previously deposited on structure surfaces into the atmosphere flow stream because of local fluid/structure shear forces.

<b>Table 4-4 Thermal-Hydraulic Washdown Processes and Phenomena</b>	
<b>Processes and/or Phenomena</b>	<b>Description</b>
Containment Spray Droplet Fallout	Falling containment sprays condense steam and cool the containment atmosphere. The interaction of spray droplets with the atmosphere can induce local fluid vortices, eddies, or fields.
Spray Droplet Accumulation	Spray water would accumulate and run off of surfaces, providing another mechanism for debris transport.
Floor Drainage of Accumulated Spray	Spray water accumulating on a floor, other than the sump floor, would drain from that floor by pathways such as floor drains or an overflow onto a lower level.
Pool Formation (Other than Sump)	In some circumstances, spray water can pool at locations other than the sump. Water could pool in a refueling pool if the pool drains were not open or if the drains were blocked by debris.
Spray Drainage Runoff	The drainage of accumulated spray water from surfaces.
Break Deluge	Large flow rate of liquid effluent from a break in the reactor coolant system onto containment structures.
Ice Melt in Ice Condenser Plant	The water from melting ice would drain from the ice banks and thereby transport debris with the ice melt.

<b>Table 4-5 Washdown Debris-Transport Mechanisms</b>	
<b>Processes and/or Phenomena</b>	<b>Description</b>
Spray Droplet Sweepout of Debris	Transport of airborne debris from the containment atmosphere by containment spray droplets.
Surface Reentrainment of Debris	Reentrainment of debris previously deposited on structure surfaces by containment spray runoff.
Deluge Transport	Relocation of debris from containment structures due to interactions with the deluge of liquid from the ECCS and/or spray system.
Accumulation of Entrained Debris	Debris being transported by containment spray runoff can accumulate together at such locations as floor drains.
Drain Blockage by Debris	Accumulated debris could potentially form a flow blockage at drains, such as floor drains or the refueling pool drains.
Pool Entrapment of Debris	At any location where water could pool, debris could settle to the floor of that pool and remain there.
Debris Erosion (Disintegration)	Further destruction of debris as a result of spray drainage or deluge water impacting the debris. Under these conditions, disintegration is in the form of erosion, where finer debris, such as individual fibers from fibrous insulation, is removed from larger debris. This fine debris tends to transport readily from both the upper reaches of the containment by the containment sprays and within the sump pool. Further, this fine debris forms a thin uniform layer across the entire sump screen, threatening blockage. Thus, a relatively small amount of disintegration could have a significant effect on screen blockage. Erosion of fibrous debris by falling water and within a turbulent pool has been seen experimentally.

#### 4.1.4 Debris Characteristics Affecting Transport

Transport of debris is strongly dependent on the characteristics of the debris formed, including the types of debris (insulation type, coatings, dust, etc.) and the size distribution and form of the debris. Each type of debris has its own set of physical properties, such as density; specific surface area; buoyancy when dry, partially wet, or fully saturated; and settling velocity in water. Several distinct types of insulation are used in PWR plants. The size and form of the debris depend on the method of debris formation, e.g., jet impingement, erosion, aging, operational, etc. The size and form of the debris affect whether it passes through grating or a screen, as well as affecting its transport to the grating or screen. For example, fibrous debris may consist of individual fibers or large sections of an insulation blanket and all sizes between these two extremes.

#### 4.2 Airborne/Washdown Debris-Transport Testing

The NRC, U.S. industry, and international organizations conducted tests to examine different aspects of airborne and washdown debris transport within a nuclear power plant containment experimentally. The results of these tests provided qualitative insights into which physical processes and phenomena were most important and also provided quantitative test data regarding debris characteristics, deposition, and transport. Much of this information was obtained specifically to support the resolution of the BWR strainer-blockage issue; however, the information is also directly applicable to the PWR sump-screen blockage issue, for the most part.

The testing pertinent to airborne/washdown debris transport is listed in Table 4-6. The first four test series pertained to airborne debris transport, but not to washdown debris transport. Conversely, the last two test series in the table pertain to washdown but not airborne debris transport. The single test series sponsored by the BWROG had elements of both airborne and washdown debris transport within the series.

The NRC sponsored three series of small-scale tests designed to examine the transport and capture characteristics of debris within a BWR

drywell caused by steam and water depressurization flows and to examine the transport and erosion characteristics of debris within a drywell by water washdown flows.<sup>4,3</sup> Two test series were designed to study airborne transport of fibrous debris: the separate-effects and the integrated-effects debris-transport tests. In the separate-effects tests, transport characteristics were determined for fibrous debris capture on structures where the test configuration was set up for one type of structure and orientation at a time, e.g., debris transport through a grating. In the integrated-effects testing, a combination of different types of structures was implemented into the test chamber at the same time. A third test series examined the transport and erosion characteristics of debris by water washdown flows within a drywell that impacted fibrous debris with water to determine the extent of transport from a structure and the degree of erosion to the debris that remained on the structure.

To date, only one series of small-scale tests has been performed by U.S. industry that relates to airborne/washdown debris transport. These tests were conducted to provide guidance to utilities for resolution of the BWR strainer-blockage issue, but are qualitatively applicable to the PWR issue as well.

Experiments have been conducted outside the U.S., and the NRC has reviewed data applicable to the resolution of the BWR strainer and PWR sump-screen clogging issues in the U.S. Three of these experiments obtained data that pertain to airborne and/or washdown debris transport. The primary source for this information is a knowledge base report prepared by the NRC for the Organization for Economic Cooperation and Development (OECD).<sup>4,4</sup>

These tests are summarized in the order listed in Table 4-6.

##### 4.2.1 Airborne Phase Debris-Transport Testing

###### 4.2.1.1 Separate-Effects Debris-Transport Tests

In 1996-1997, the Alden Research Laboratory (ARL) conducted tests for the NRC that were designed to provide a basic understanding of

**Table 4-6 Airborne/Washdown Debris-Transport Testing**

<b>Test Description</b>	<b>Sponsor, Laboratory, and Date</b>	<b>Debris Source</b>	<b>Transport Medium</b>	<b>Objectives</b>	<b>Significant Limitations</b>	<b>Reference</b>
<b>Airborne-Phase Debris Transport</b>						
Separate-Effects Debris-Transport Tests	NRC ARL 1997	Injection of Prepared LDFG Debris	Fan-Driven Air	Obtain basic data related to inertial capture of small insulation debris generated by a postulated MSLB. Possible degradation and erosion mechanisms by airflow were a secondary objective.	Limited debris sizes and loadings. One-dimensional flow fields. Non-prototypical congestion of structures. Use of airflow rather than steam flow. Only one type of insulation debris tested (LDFG).	NUREG/CR-6369 (Volume 2)
Integrated-Effects Debris-Transport Tests	NRC CEESI 1997	Air-Blasted LDFG Debris	Blowdown Air Jet	Obtain debris-transport data under integrated conditions prototypical of a BWR drywell following a postulated LOCA.	Use of airflow rather than steam flow. Surface wetness applied by spray mist rather than steam condensation. Only one type of insulation debris tested (LDFG).	NUREG/CR-6369 (Volume 2)
HDR Facility Blowdown Experiments (Full-Scale)	Owens-Coming HDR 1985	Steam-Blasted LDFG	Blowdown Steam Jet	Obtain containment thermal-hydraulic blowdown data. Two tests conducted to determine capability of LDFG insulation to withstand impact of high-pressure steam-water blast and to determine debris size distribution.	Limited debris-transport testing and data collection (for most of the test, debris-transport data were a by-product).	NEA/CSNI/R (95) 11 and NUREG-0897, Rev. 1
Karishamn Steam Blast Tests	ABB-Atom Karishamn 1992	Steam-Blasted Aged Mineral Wool	Blowdown Steam Jet	Investigate the dislodgment of insulation and subsequent transport in the containment following a LOCA.	Test scaling was too small to realistically simulate thermal-hydraulic conditions in a BWR drywell. Transport velocities were not typical of conditions expected in a nuclear power plant, i.e., the flows were too slow.	NEA/CSNI/R (95) 11

**Table 4-6 Airborne/Washdown Debris-Transport Testing**

<b>Test Description</b>	<b>Sponsor, Laboratory, and Date</b>	<b>Debris Source</b>	<b>Transport Medium</b>	<b>Objectives</b>	<b>Significant Limitations</b>	<b>Reference</b>
<b>Airborne/Washdown Combined-Phase Debris Transport</b>						
BWROG Debris-Transport Tests	BWROG CD 1996	Injection of Prepared LDFG and RMI Insulation and Paint Chips	Steam/ Water Jet	Obtain insulation debris-transport data applicable to transport of debris from a BWR drywell to the wetwell through the downcomers and main vents. Specifically, obtain conservative estimates of the transport fractions for both the blowdown and washdown phases.	Test scaling was too small to realistically simulate thermal-hydraulic conditions within a BWR drywell.	NEDO-32686
<b>Washdown-Phase Debris Transport</b>						
Separate-Effects Insulation Debris Washdown Tests	NRC/SEA 1997	Air-Blasted and Prepared LDFG Debris	Sprayed Water	Obtain water-driven debris erosion data for debris captured by floor gratings.	Testing was small-scale. Only one type of insulation debris tested (LDFG).	NUREG/CR-6369 (Volume 2)
Oskarshamn NPP Containment Washdown Tests (Full-Scale)	ABB-Atom Oskarshamn NPP 1994	Old and New Insulation Material (Unknown Type)	Sprayed Water	Investigate the transport of insulation material by the containment spray system in a full-scale plant.	Most test conditions including type of insulation were not reported. Debris preparation and initial distribution may not have been typical of a postulated LOCA.	NEA/CSNI/R (95) 11

LOCA-generated fibrous insulation debris capture on typical BWR containment structures as a result of an inertial capture process. Because these data were obtained for basic structural components that are common to both PWR and BWR containments, the results of these tests are generally applicable to all BWR and PWR containment designs. A complete description of the tests, including apparatus descriptions, procedures, and data, is documented in Volume 2 of Ref. 4-3.

The structural congestion (pipes, gratings, I-beams, and vents) within containments would affect the transport of fibrous debris, and substantial quantities of impacted debris likely would remain stuck (captured) on these structures. The tests were designed to examine the following.

1. The role of debris inertia on the capture during airborne transport of fibrous debris on typical BWR drywell structures (similar structures exist in PWRs). A number of different structures were tested to examine the effects of shape and orientation relative to the direction of flow.
2. The effect of surface wetness on retention of fibrous debris by surfaces impacted by debris. It was suspected that surface wetting resulting from steam condensation would significantly enhance the efficiency of capture.
3. Possible degradation and erosion mechanisms for captured large pieces (e.g., trapped against a grating) during blowdown. Such fibrous debris would be subjected to high-velocity steam flow intermixed with water droplets, thereby potentially further degrading the debris pieces.

A once-through flow tunnel was constructed of plywood panels with a blower at the upstream end of the test section and an air-filtering plenum downstream of the test section. The primary test section had a cross section with inner dimensions of 4 ft by 4 ft and a length of 8 ft. Because airflow velocities within this test section were limited to about 50 ft/s, a smaller 2-ft by 2-ft test section was inserted within the larger test section in selected tests to achieve velocities of up to 150 ft/s. The smaller test section was 5 ft long. The test apparatus is shown in Figure 4-1.

Perforated plates and a honeycomb structure were used to achieve a uniform velocity distribution. In addition, the head loss across this flow-conditioning device was calibrated with respect to tunnel velocities and later used to establish specified test section velocities.

Test obstructions consisted of individual components and combinations of individual components, with the individual components including I-beams, gratings, pipes, and a vent cover. Single-component tests involved mounting one or two objects side by side within the test tunnel with the objects being the same type, having identical cross sections, and being aligned similarly to the flow. In combined-component tests, combinations of components (one or more shapes) were mounted with different orientations, i.e., different alignments to the flow, and sometimes positioned so that front-mounted components partially shielded rear-mounted components. Thus, the effects of component proximity wake effects and shielding were evaluated.

Obstruction surfaces were wetted in most tests by spray injection nozzles located upstream of the test section. The duration of the spray controlled the extent of surface wetness (either 10 s or 30 s). Most tests were conducted with a 10-s prewet time.

The fibrous insulation debris was injected into the tunnel through a rupture disk capping one end of each of two pressurized 4-in. polyvinyl chloride (PVC) pipes. The pipes' sections were suspended from the tunnel ceiling downstream of the flow-conditioning structure and filled with preshredded insulation. Air was pumped into the pipe until the rupture disk failed, so that the jet of escaping air dispersed the insulation debris. The fibrous insulation debris was generated from heat-treated LDFG blankets.

Forty-eight tests were conducted to examine a variety of test conditions. The test parameters included

- the flow velocity (24–150 ft/s),
- the wetness of structure surfaces (dry to draining water film conditions),
- the type of structure (I-beams, piping, gratings, and Mark II vents),
- the approximate debris size, and
- the debris loading (6.3–12.5 g/ft<sup>2</sup>).

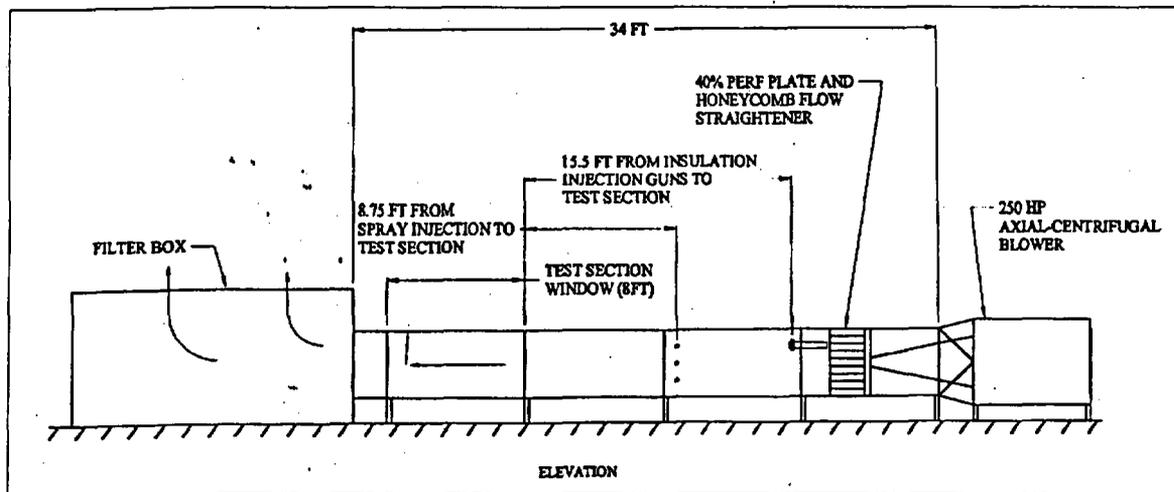


Figure 4-1 Separate-Effects Insulation Debris-Transport/Capture Test Apparatus

Within the ranges of tested parameters, the test data exhibited the following trends.

- Gratings captured more fibrous insulation debris than did other types of structures. For example, in combination-component tests in which the grating was placed downstream of other structures (pipes and I-beams), the grating captured substantially more debris than all other upstream structures combined.
- Surface wetness clearly influenced the extent of debris capture on structures, especially for pipes and I-beams. When pipes and I-beams were dry, these surfaces essentially did not capture debris. Capture on floor gratings was affected by wetness but was less sensitive to the degree of wetness than were other structure types. Typical debris capture by a wetted pipe is shown in Figure 4-2.
- Tests with dual gratings in series showed substantially more debris capture on the upstream grating (averaging about 25%) than on the downstream grating (about 12%), most likely because the largest debris was removed from the flow stream by the upstream grating. Note that the capture percentages reflect the fraction of the mass of debris approaching a particular structure that subsequently was captured by that structure.
- Mark II vents with wetted surfaces captured about 12% of small debris on the cover plate and the simulated drywell floor.
- Break-up or disintegration of fibrous debris captured on a grating was negligible when 6-in. by 6-in. thin pieces (1/8 to 1/2-in. thick) of insulation were subjected to gas velocities approaching 140 ft/s.
- Gravitational settling (i.e., debris settling to the tunnel floor) was negligible for all tests except the Mark II vent geometry (settling was not included in the vent-capture percentage).

These separate-effects tests had the notable limitations of

1. relatively light debris loadings on the structures compared with expected BWR conditions,
2. a modest assortment of debris sizes,
3. nonprototypical congestion of structures, and
4. overly simplified flow fields approaching the structures.

The debris loading approaching a structure refers to the density of debris pieces per unit of cross-sectional flow area. The principal concern was that debris captured on a structure could be knocked free (reentrained) by the impact of additional debris under conditions of heavy debris loading, thereby effectively reducing the capture efficiency for that structure. To ensure conservative estimates for debris capture, additional data were needed for heavier, more prototypical debris loadings. Therefore, additional experiments of a more representative

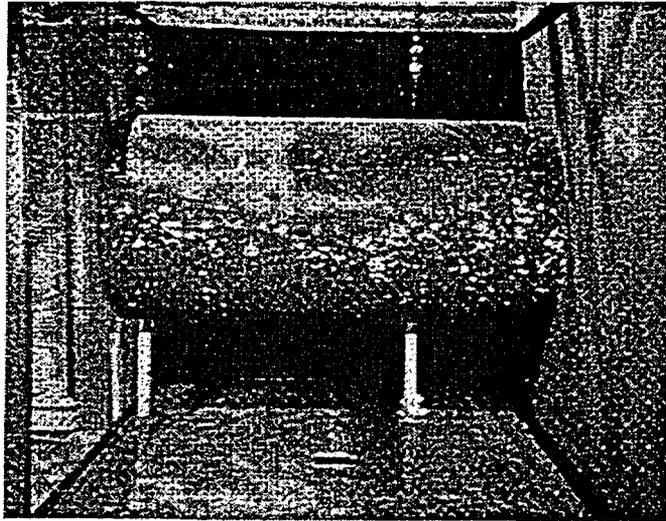


Figure 4-2 Typical Fibrous Debris Capture by a Wetted Pipe

and integrated nature were performed to further understand the role of fibrous insulation debris inertial capture.

#### 4.2.1.2 Integrated-Effects Debris-Transport Tests

Although the separate-effects tests described in Section 4.2.1.1 provided valuable data, those tests still had the notable limitations listed above. The integrated debris-capture tests were designed to minimize the limitations noted for the separate-effects tests. The primary objective of these tests was to provide integrated fibrous-debris-capture data to benchmark analytical models and methods used to predict debris transport within a BWR drywell. The integrated-effects tests also combined debris generation with debris transport. The integrated debris-transport tests were conducted at the CEESI air-blast facility in 1997. A complete description of the tests, including apparatus descriptions, procedures, and data, is documented in Volume 2 of Ref. 3. Because these data were obtained for basic structural components that are common to both PWR and BWR containments, the results of these tests are generally applicable to all BWR and PWR containment designs.

The CEESI facility was capable of storing as much as 11,000 ft<sup>3</sup> of air at 2,500 psia. In these tests, a dispersing 1,100-psi air jet was used to destroy insulation blankets and then transport

the debris through test chambers that contained obstructions. The insulation blankets were mounted and restrained in a manner designed to maximize their destruction and therefore maximize the amount of debris impacting the structures. Debris sizes ranged from individual fibers to partially intact blankets. The structures for debris capture were more complex and more prototypical than those used in the separate-effects testing. The flow patterns in the integrated testing were also more complex, (more three-dimensional) than those for the separate-effects testing. The data from these integrated tests were compared with the data from the separate-effects tests for insights into the effects of complex structural arrangements and fluid flows on debris capture.

The main test chamber, which is shown in Figure 4-3, consisted of a large horizontal cylinder with an inner diameter of 9.4 ft and a length of 93 ft. In addition, a 32-ft auxiliary chamber of the same diameter was attached with a flanged collar at the exit end of the main chamber in a horizontal "L" configuration. The upstream end of the main chamber, behind the air-jet nozzle, was blocked almost completely so that only a small portion of the air could exit the chamber in the reverse direction. The purpose of the auxiliary chamber was to investigate fibrous debris capture associated with flows undergoing a change in direction; in this case, a 90° bend.

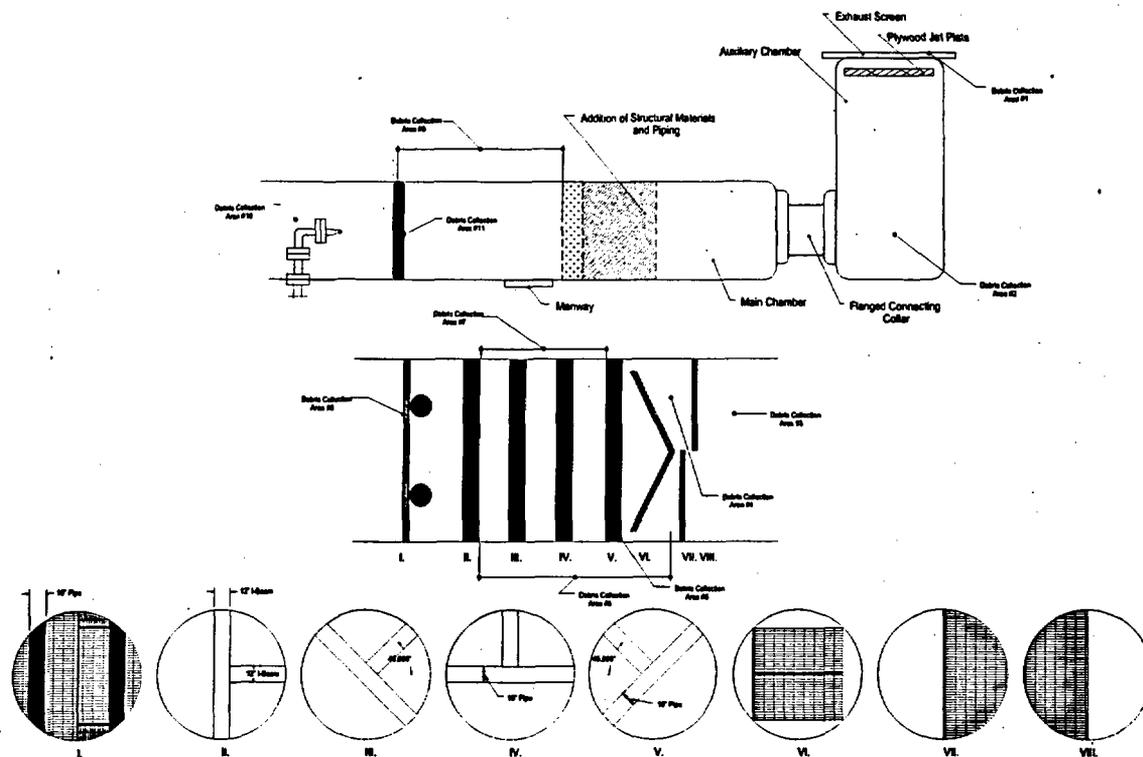


Figure 4-3 CEESI Air-Jet Test Facility

Target insulation blankets were mounted a few feet downstream of the air-jet nozzle. The blankets were mounted on a 12.75-in. outer diameter pipe that extended across the main test chamber at mid-height and positioned directly in front of the air jet nozzle. The target pipe mount was secured to rails so that the target could be positioned any distance from the jet out to 30 ft from the nozzle. The targets consisted of canvas-covered LDFG insulation blankets that were usually 3 ft long with either two or three stainless-steel bands placed around them to hold the blanket in place. Metal jackets were not used to encapsulate the blankets. A 1.5-ft-long blanket was used in one test.

The structural test section contained an assemblage of structural components (gratings, pipes, and I-beams) designed to simulate a prototypical section of a BWR drywell. The design focused on maintaining the same surface-to-volume ratios as found in BWR containments, and, to the extent practical, the structures were oriented in a manner analogous to the orientations found in actual plant

conditions. These structural components are also shown schematically in Figure 4-3.

All I-beams were 12 in. from upper to lower flange, and all pipes were 10 in. in diameter. I-beams were oriented with their web into the direction of airflow. Starting from the front (the flow entrance) of the structural test section, the test section contained the following structural subassemblies.

- A continuous grating with two vertically oriented pipes directly behind it
- I-beams with a full-length beam oriented vertically and a half-beam oriented horizontally
- I-beams with a full-length beam oriented 45° from vertical
- Horizontally oriented pipe with a half I-beam oriented vertically
- A pipe oriented 45° from vertical
- A V-shaped grating (approximately 56°) that obstructed about 57% of the total test-chamber flow area.

- Two half-section gratings separated axially by 22 in., referred as the split grating.

In the separate-effects tests, surface wetness was shown to affect the capture efficiency of structures profoundly. Therefore, surface wetness was a primary concern in the integrated tests. In the CEESI tests, structures were prewet with misters positioned throughout the test section. The mister system, which was constructed from PVC pipe, sprayed warm water as fine droplets from a high-pressure (150-psig) source. The misting system was operated long enough (approximately 10 min) to form a draining water layer.

The size of the jet nozzle was designed to minimize air usage while still allowing the jet to continue long enough for the debris-generation and debris-transport processes to complete (i.e., all debris was either deposited onto a surface or passed through the test chamber). The nozzle discharge was monitored and recorded. Developmental tests determined that at least 10 s were required for a 4-in. diameter nozzle and 12 s were required for a 3-in. diameter nozzle. Facility operators were able to approximate the jet-duration time specified for a particular test. Air-jet discharge was initiated using a rupture disk.

The developmental tests were instrumented with Pitot tubes to monitor and map the flow distributions before the flow entered the congested test section. The airflow velocities entering the area containing the congestion of structural components generally ranged from 25 to 50 ft/s. These velocities were in good agreement with velocities predicted for the tests using a commercially available CFD code. These velocities were also comparable to CFD-predicted velocities for a typical BWR drywell. After the flows dissipate into pressure-driven flows, BWR steam-flow velocities were predicted to generally range from about 30 to 50 ft/s. Therefore, the airflow velocities in the CEESI tests were considered prototypical of steam-flow velocities that would exist in a BWR drywell following a postulated LOCA.

Ten production tests that examined a variety of test conditions regarding debris transport were conducted. In addition, four of the developmental tests also provided useful debris-transport data. The test parameters included:

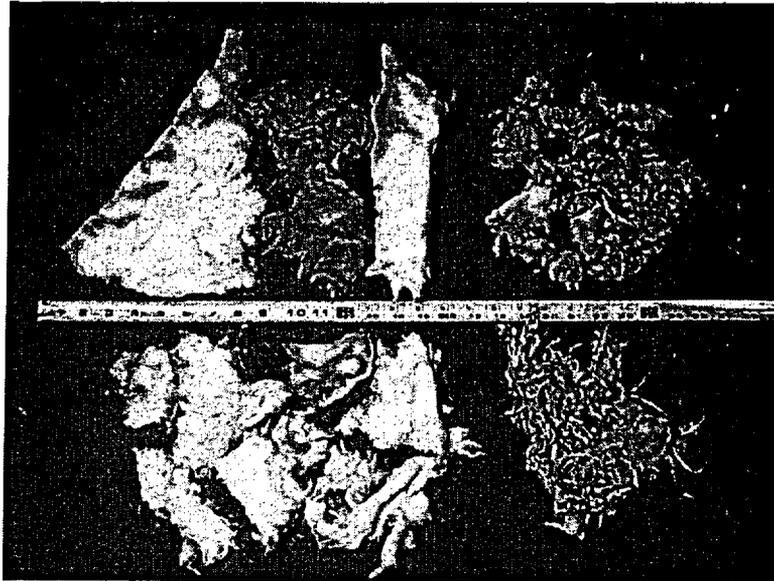
- the nominal nozzle diameter, either 3 or 4 in.,
- the duration of the air-jet flow (5 to 24 s),
- the surface wetness, and
- the distance between the nozzle and the target.

Most of the tests were conducted using a nominal 4-in. diameter nozzle, a flow duration of 12 to 17 s, and wet surfaces. One of the fibrous-debris transport tests (Test H7) was conducted with all surfaces deliberately maintained dry to illustrate the effect of surface wetness on debris capture. In addition, the mister system partially malfunctioned in two tests, resulting in incomplete surface wetness and a subsequent reduction in debris capture.

The distance between the nozzle and the target was initially adjusted until the optimum distance for maximum target destruction was found; a distance of ~120 in. (L/D of 30) appeared to maximize destruction. Insulation debris consisted of pieces of bare fiberglass insulation of various sizes, pieces of shredded canvas, agglomerated pieces containing both insulation and canvas, and large sections of the canvas cover that remained relatively intact and sometimes contained substantial quantities of insulation. The bare insulation was divided into three general size groups—large, medium, and small. Samples of debris pieces are shown in Figure 4-4.

The tests demonstrated the ability of structural components to capture debris. The average overall transport fraction for small debris in the CEESI was 33% of the total debris generated, i.e. ~2/3 of the generated debris was captured, primarily by inertial impaction, within the test facility.

Once again, gratings were found to be the most effective at catching fibrous debris. The debris captured by the split grating in Test H2 is shown in Figure 4-5. Note that the upstream gratings had captured the large debris already. The capture efficiencies for the split grating and for each test are plotted in Figure 4-6 as a function of debris loading. The corresponding separate-effects data also are shown. This figure clearly shows the effect of surface wetness and debris loading and the general agreement between the separate and integrated effects tests.



**Figure 4-4 Samples of Debris Generated in the CEESI Tests**



**Figure 4-5 Typical Debris Deposition on a Grating in CEESI Tests**

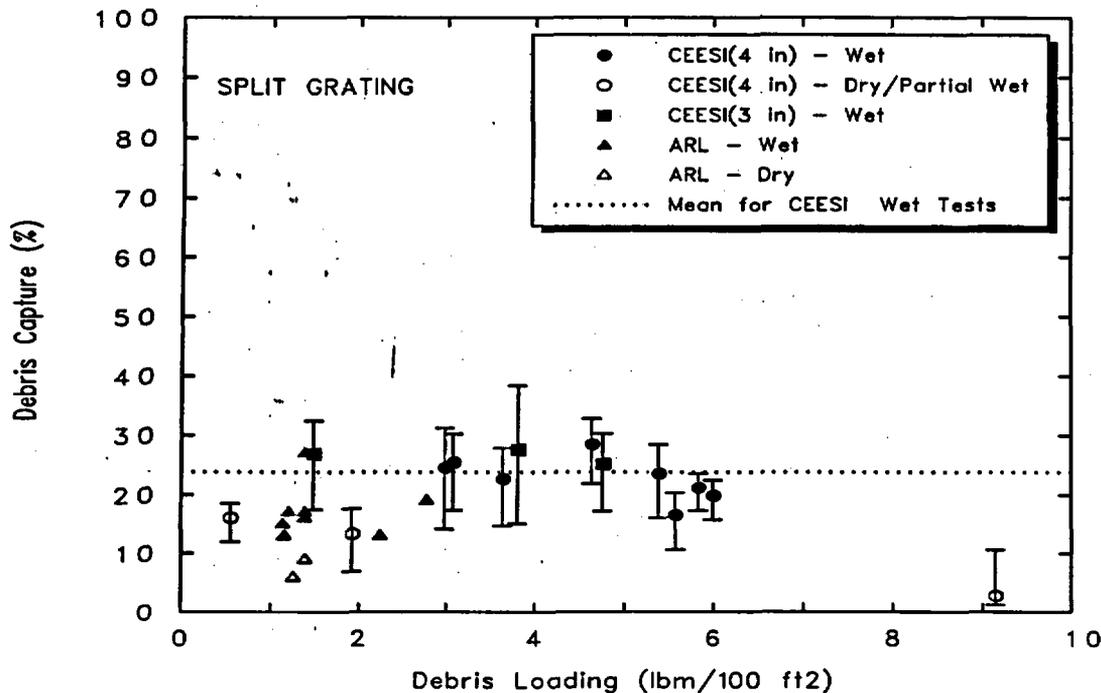


Figure 4-6 Capture of Small Debris by Grating

The average fractions of small debris captured by each test structure component are shown in Table 4-7. Note that the first continuous grating stopped almost all of the larger debris and that the capture fraction for the continuous grating was not obtained. This was because of the failure of the mister system to wet the continuous grating adequately (i.e., this grating illustrated dry behavior).

The 90° bend between the two chambers caused debris to be captured at the bend, which was maintained wet by a mister in the auxiliary chamber. Seventeen percent of the debris entering the auxiliary chamber was trapped on the chamber wall as a direct result of the bend. The I-beams and pipes captured a lesser but still substantial amount.

The capture fractions were found to be relatively independent of the debris mass loading (i.e., lbm/ft<sup>2</sup>) impacting the structures. The integrated-effects tests' capture data were consistent with the separate-effects tests data, indicating that the finer aspects of the local flow fields (e.g., eddies and wakes) do not influence debris capture significantly. The separate-

effects and integrated-effects tests clearly established that a fraction of the small and large debris would be deposited as the debris transported through the drywell following a blowdown. The most likely locations for the deposition in a BWR are the floor gratings located at different elevations. These captured pieces would potentially be subjected to subsequent washdown water flows.

#### 4.2.1.3 Blowdown Experiments at Heissdampfreaktor (HDR) Facility

A decommissioned 100-MW<sub>th</sub> superheated steam reactor, HDR, was refitted as a testing facility for LWR safety research.<sup>44</sup> The reactor vessel, without its internals, was decontaminated and modified for blowdown testing. For a blowdown test, the vessel was typically charged initially to 11 MPa and 310°C. Note that U.S. PWRs typically operate at a pressure of about 15 MPa.

About 40 blowdown tests were performed during the late 1970s and the 1980s. In general, the aim of these experiments was the qualification of equipment under accident conditions. Some of

Structure Type	Debris Capture
I-Beams and Pipes (Prototypical Assembly)	9%
Gratings	
V Shaped Grating	28%
Split Grating	24%
90° Bend in Flow	17%

the tests lasted for less than a second; during others, the content of the pressure vessel was allowed to expand until the vessel pressure dropped to containment pressure. The diameter of the nozzle was 0.45 m, and the break was initiated using a rupture disk. A deflector plate was installed in front of the nozzle to break up the jet. The tests were reviewed in regard to their applicability to debris generation; this review is discussed in Ref. 4-5.

The transport behavior of the insulation debris was not an objective of the experiments; it was only a by-product. Insulation material that was present for operational purposes was damaged badly in the first experiments and replaced by other insulation types in an effort to limit the damage. Different insulation types were used, including jacketed mineral wool (fibrous), foam glass, encapsulated fiberglass, covered glass wool, and RMI.

The HDR containment measures about 20 m (66 ft) in diameter and 60 m (200 ft) high and is subdivided into a number of compartments. The break compartment is situated about 25 m (82 ft) above the sump. The water from the break had to pass down through four floors to reach the sump.

Although debris transport was not an objective of the experiments, three observations were made regarding the transport of insulation debris within the HDR.

- Debris was found in rooms adjacent to the break compartment, as well as in the break compartment, for each type of insulation except RMI, indicating more limited transport for RMI than for other types of debris. However, only one RMI test specimen was used, so this test result may not be representative of the behavior of large amounts of RMI debris.

- The mineral wool insulation originally installed before the first blowdown experiment was torn from the piping during blowdown. This debris was caught in large flocks at railings and at other obstacles, as well as in stagnation areas. This observation provided initial indications of how fibrous debris would be captured.
- Almost no insulation debris was found in the sump, which was four floors beneath the break compartment. However, the post-test investigation did not examine the distribution of individual fibers. The predominant pathway for the blowdown flows would have been toward the larger compartments, i.e., the upper dome. Also note that these tests did not consider washdown debris transport from the operation of containment sprays, which certainly would have washed debris to the sump.

The results from these tests in regard to debris transport were only qualitative; even the distribution of insulation debris collected within the break and adjacent compartments was not quantified. However, insights were gained that supported later debris-transport testing.

#### 4.2.1.4 Karlshamn Steam Blast Tests

Experiments were conducted by ABB-Atom at the Karlshamn fossil-fueled power plant to determine the relative distribution of insulation debris in the containment.<sup>44</sup> These experiments were conducted in a small-scale test assembly that was subdivided into a few inner volumes. The outer dimensions of the assembly were 3.33 m by 2.56 m, and the assembly was 4.25 m high. The assembly was divided into four levels, as shown in Figure 4-7. Floor gratings connected the upper three levels. The lowest level simulated a wetwell, and the connection between the lowest level and the level above simulated a vent downcomer. The only water

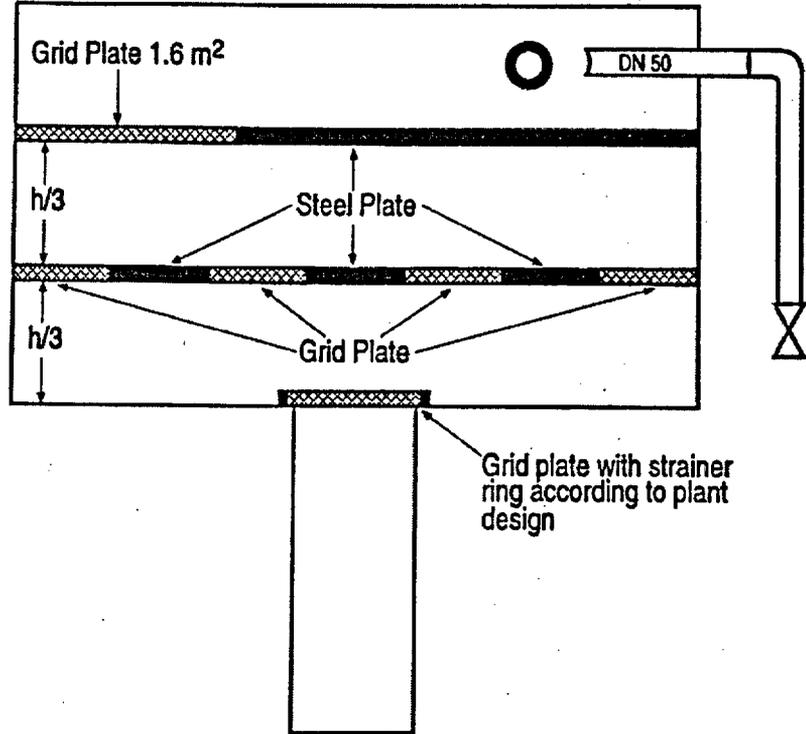


Figure 4-7 ABB-Atom Containment Experimental Arrangement

involved in these tests was condensed steam. Fibrous insulation was attached to a pipe in the upper level of the test apparatus, where it was exposed to a steam jet driven by an 8-MPa steam source.<sup>3</sup> The jet fragmented the insulation, and the insulation debris was dispersed within the test apparatus by the steam flow and displaced air.

Most of the fibrous insulation debris was distributed in the upper parts of the test apparatus. The gratings held debris back, debris adhered to walls where steam condensed, and debris accumulated in areas of low flow velocity. Only minor quantities of the debris reached the wetwell level through the downcomer vent. In fact, the quantities reaching the wetwell were about 3% or less of the total quantity of dislodged insulation. As expected, the quantities of debris transported to the wetwell were found to be dependent on the transport velocities.

<sup>3</sup>An unknown amount of pressure was lost as the steam flowed through 75 m of pipeline from the source to the jet.

These findings are consistent with debris-transport test results from later, more sophisticated testing, even though the later testing showed much more debris transported to the wetwell. The peak bulk flow velocities in the Karlshamn tests were about 1 m/s, whereas the transport velocities were much faster following a postulated LOCA in an actual plant (and in the later, more typical tests conducted by the NRC). In the Karlshamn tests, debris was able to settle gravitationally at all levels, whereas at typical transport velocities, the flow turbulence would generally be much too high to allow settling anywhere near the break. After break flows disperse sufficiently into compartments well away from the break, flow velocities and turbulence can be expected to slow sufficiently to allow gravitational settling, as was seen in the Karlshamn tests. Thus, the Karlshamn tests might be considered representative of debris transport in some areas of PWR containments but not in the region of the break. The Karlshamn results might also be representative of debris transport following very small LOCAs. In general, the Karlshamn tests results have

limited applicability to the U.S. PWR sump-screen-blockage issue because the test scaling was not representative of U.S. containments and the debris transport velocities were not typical of expected velocities.

#### **4.2.2 Airborne/Washdown Combined Phase Debris-Transport Testing**

##### **4.2.2.1 BWROG Testing of Debris Transport Through Downcomers/Vents**

The NRC issued NRC Bulletin 96-03, "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," on May 6, 1996. All BWR licensees were requested to implement appropriate measures to ensure the capability of the ECCS to perform its safety function following a LOCA. The bulletin noted that plant-specific analyses to resolve this issue are difficult to perform because a substantial number of uncertainties are involved. These uncertainties included the amount of debris that would be transported to the suppression pool. The BWROG then developed the URG<sup>4,6</sup> to provide utilities with:

- guidance on the evaluation of the ECCS potential strainer clogging issue for their plants,
- a standard industry approach to resolution of the issue that is technically sound, and
- guidance consistent with the requested actions in the bulletin for demonstrating compliance with 10 CFR 50.46.

The URG includes guidance on a calculational methodology for performing plant-specific evaluations. The NRC reviewed the BWROG URG document and issued the staff's SER on August 20, 1998.<sup>4,7</sup>

The BWROG sponsored tests designed to gather data on the transport of insulation debris from a BWR drywell to the wetwell through downcomers and main vents. The overall objective of this test program was to determine conservative estimates for the blowdown and washdown-transport fractions. As described in Ref. 4-6, transport fractions were measured through a 1/8-scale Mark I main vent and a Mark II downcomer for saturated steam, saturated water jets, and coolant water flows. Thus, the dynamics of debris transport were simulated in subscale containment configurations and scaled blowdown rates. A total of 33 tests was

conducted with fibrous insulation, RMI insulation, and paint chips. The tests investigated the effects of

- simulated debris preparation,
- full-scale prototypical gratings,
- blowdown jet orientation and duration,
- duration of debris washdown process,
- flow rate and pipe orientation, and
- debris introduction location.

Drums were used to construct containment vessels configured for the Mark I and Mark II vent designs, as shown schematically in Figures 4-8 and 4-9. The apparatus was simplified in that it did not contain any of the structural congestion typical of reactor containments, e.g., piping, wire trays, etc. A catch basket was attached to the end of the vent to trap the exiting debris. The drums were approximately 30 in. in diameter and 41 in. high (~125 gal.). For the Mark I configuration, prototypically-sized grating was placed at one level to estimate the effect of gratings on transport. Gratings were placed at two levels in the Mark II configuration. The system pressure, washdown flow rates, and debris quantities were measured in the tests.

For fibrous debris transport, it was concluded that

- the transport of all fibrous debris from the lower drywell volume is not a certainty;
- only the finest fiber debris fragments in Mark I containments may be carried from the lower drywell down the main vents;
- for the Mark II configuration, the average transport of fine fibers never exceeded 56%;
- for fiber debris larger than the distance between the bars of a typical grating, the transport fraction from the Mark I lower containment was 33%; and
- debris hang-up on the grating was dependent on grating location relative to the pipe-break location.

For RMI debris transport, it was concluded that

- nearly all of the small stainless-steel RMI foils transport from the lower Mark I containment volumes and
- an average of 10% of the small stainless-steel RMI foils transport from the lower Mark II containment volumes.

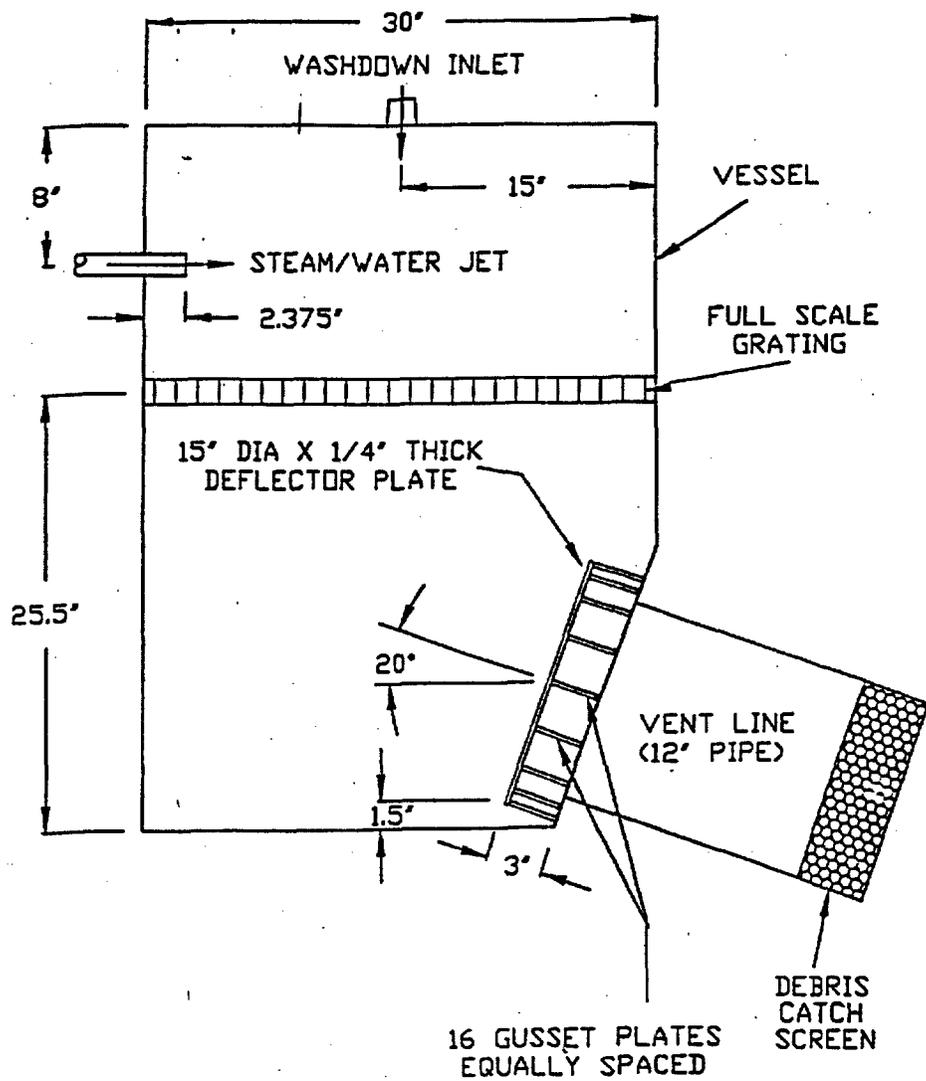


Figure 4-8 Schematic of 1/8-Scale Mark I Configuration Test Apparatus

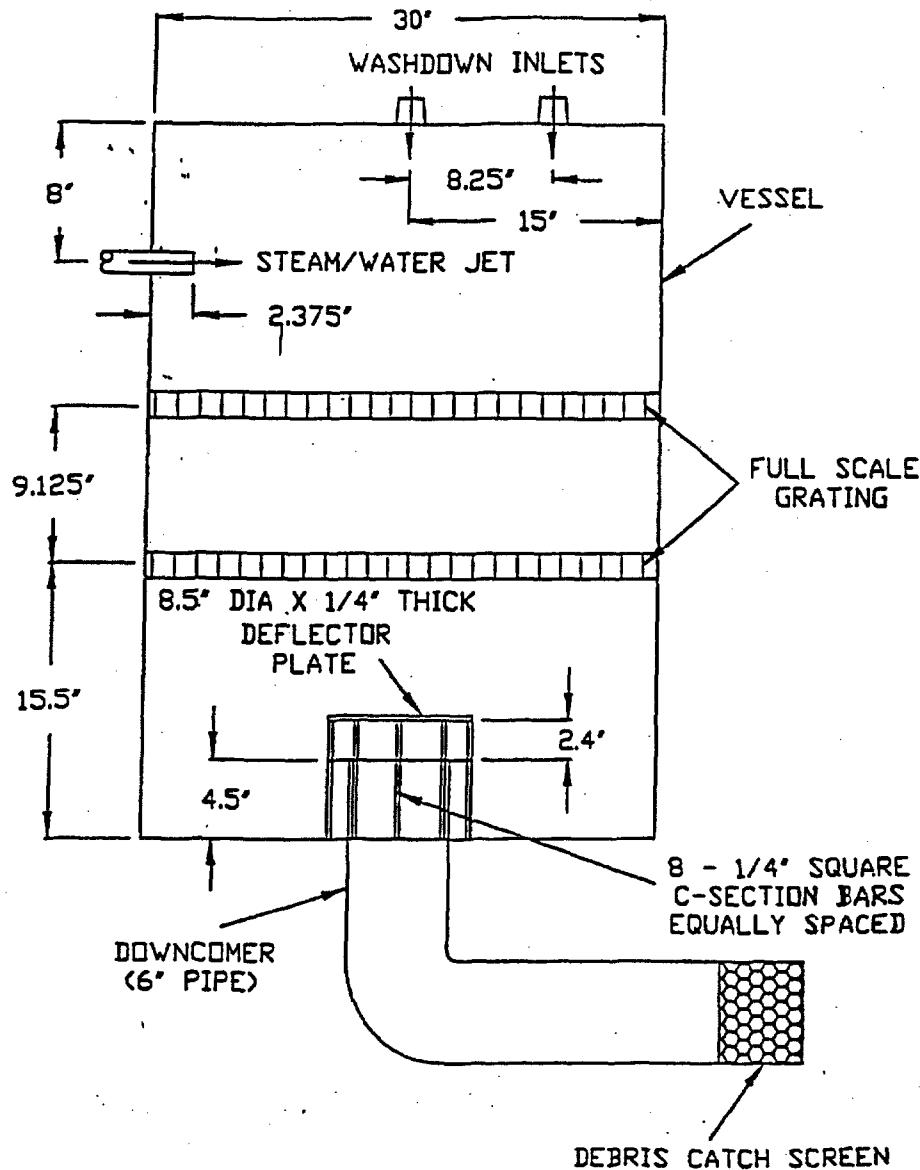


Figure 4-9 Schematic of 1/8-Scale Mark II Configuration Test Apparatus

The BWROG recommended 100% fine-fibrous debris transport through the drywell to the vent downcomers for the Mark I and III containment designs and 56% for the Mark II design. The transport of the large fibrous debris depended on the location of the debris relative to the gratings. For RMI debris, the BWROG again recommended 100% for the Mark I and III designs, but only 10% for the Mark II design. These numbers were for airborne and washdown debris transport combined.

The NRC review of the BWROG URG document<sup>4,7</sup> with regard to the drywell debris transport determined that the guidance in the URG was nonconservative for Mark II containments. The NRC staff concluded that the same transport fractions used for the containments of Mark I and Mark III designs should also be used for the Mark II containments, i.e., 100% transport.

The primary criticism of the BWROG drywell debris-transport tests was of the scaling of the tests in that the drums were simply too small to simulate realistically the thermal-hydraulic conditions within a BWR drywell following a postulated LOCA. The test conditions, such as blowdown flow rates through the drum, may not have been prototypical. The BWROG did not perform any separate-effects testing to support the test results, which were for testing where all the effects were integrated. Much of the BWROG's claim of conservative results was based on exclusion of structures (piping, cable trays, etc.), which were not present in the experiments; however, the NRC-sponsored testing determined that the debris deposition on these structures was secondary in importance to the grating that was present in the test.

#### **4.2.3 Washdown-Phase Debris-Transport Testing**

##### **4.2.3.1 Separate-Effects Insulation Debris Washdown Tests**

Debris captured on structures during the blowdown phase following a LOCA would subsequently be subjected to transport and/or erosion by water flows from long-term recirculation cooling and containment sprays (washdown phase). For a BWR plant, the primary concern is the erosion and waterborne transport of debris captured on a floor grating directly below the broken pipe. In this situation, the debris would be pummeled by recirculation water flow that would cascade from the break to the drywell floor. Pieces of debris continually impacted by falling water could erode, allowing debris to pass through the grating and continue traveling toward the strainers. A series of tests was conducted in 1997 at a facility operated by SEA to examine the potential effect of washdown erosion. A complete description of the tests, including apparatus descriptions, procedures, and data, is documented in Volume 2 of Ref. 4-3.

The primary objective was to obtain experimental data that could be used to estimate the extent and timing of erosion during the washdown phase that would occur to insulation captured by floor gratings. The tests were to study the erosion of fibrous debris of different sizes at a variety of flow rates with the objective of answering two questions.

- What fraction of a piece of debris would erode and subsequently be transported to the drywell floor?
- Does the rate of erosion decrease with time, potentially reaching an asymptotic behavior?

These tests were conducted within a 5-ft-long, 2-ft by 2-ft vertical test chamber constructed of 0.5-in. clear polycarbonate to allow complete visualization of the tests. Figure 4-10 is a schematic of the test apparatus. An aluminum grating with 1-in. by 4-in. cells, which is characteristic of gratings used in BWR drywells, was placed at the bottom of this test chamber to hold the pieces of debris. Water was pumped into the top of the test chamber. Three simulated pipes were positioned to break up the structure of the injected flow before the water reached the debris. The simulated pipes were constructed of Plexiglas and were 2 in. in diameter.

A 400-gal. tank was used as a water reservoir for recirculation purposes. A 250-gpm centrifugal pump pumped water from this tank to the top of the test chamber through a 4-in. diameter PVC pipe. A debris catcher of fine-mesh wire screen was installed below the test chamber to catch insulation debris and erosion products, thereby preventing their recirculation back into the test chamber. A second filter was fitted to the pump suction to guarantee complete filtration of the debris from the pump inlet flow. A valve in the PVC pipe controlled the flow; the flow rate was monitored by a calibrated flow meter.

The simulated pipes conditioned the flow entering at the top of the test chamber; i.e., the bulk flow was broken up in a prototypical fashion. In this manner, water impacting the debris was spread relatively uniformly across the test chamber. In tests simulating spray-induced washdown, a removable spray head was attached to the PVC outlet.

Debris of various sizes was placed on the gratings and pipes and subjected to water flow typical of containment spray nozzles and break flow. Tests were conducted with room-temperature water using pieces of insulation generated by an air-jet impingement.

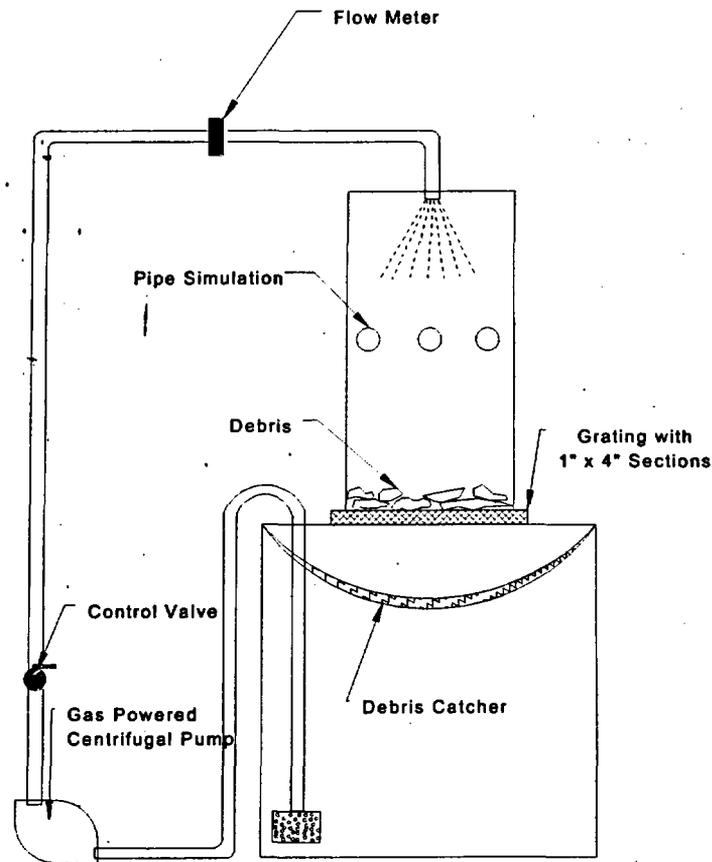


Figure 4-10 Schematic of Washdown Test Apparatus

Both the debris size and the water flow rate were varied to simulate washdown of small debris by containment sprays, as well as erosion and transport of large debris by break flows. Twenty-six parametric tests were conducted that examined a variety of test conditions. The test parameters included

- the water flow rate;
- the type of flow conditioning, i.e., with or without the removable spray head;
- the duration of the flow;
- the size and condition of the debris;
- the mass of the debris; and
- the thickness of the debris bed.

LDFG was tested, and four sizes of debris were tested to represent the range of debris expected following a LOCA:

- **Fine Debris.** This debris consisted of insulation pieces of loosely attached individual fibers less than an inch long. This debris was obtained directly from the CEESI air-jet transport tests. Such fine debris was typically found attached to wet surfaces such as pipes and gratings.
- **Small Debris.** This debris was characterized having a light, loose, and well-aerated texture with an average density lower than  $0.25 \text{ lbm/ft}^3$ . The pieces were typically about 1.5 in. in size and possessed little of the insulation's original structure. This debris also was obtained from the CEESI air-jet transport tests and was used primarily in the spray tests.
- **Medium Debris.** This debris consisted of pieces of insulation typically about 4 in. by 6 in. in size. This debris was formed by one of two methods.

- Generated in the CEESI air jet tests where, although torn, the pieces kept some of the original structure of the insulation
- Intact insulation cut with scissors into medium-sized pieces
- Large Debris. This debris consisted of relatively large pieces of insulation ranging in size from 10 in. by 10 in. to 18 in. by 18 in. This debris was cut into predetermined sizes manually. Note that the air-jet tests clearly demonstrated that large pieces of debris produced by jet impingement tended to retain most of the original insulation structure.

Within the ranges of tested parameters, the data exhibited the following trends.

- Little or no erosion is possible for insulation pieces covered in canvas when they are subjected to washdown flow resulting from either the break overflow or containment spray.
- Most of the small pieces of debris resting on the grating bars will be washed down by water within approximately 15 min, after which the washdown reaches an asymptote.
- A significant fraction of the medium pieces would be eroded and transported.
- Large pieces will not be forced through the grating even at high flows. The pieces will remain on the grating and may erode with time. Erosion also exhibits a relatively constant rate behavior, as shown in Figure 4-11. The typical condition of debris after exposure to water is shown in Figure 4-12.
- The product of the erosion of large debris is fine debris, i.e., individual fibers and small clumps of fibers, that is likely to remain suspended in a pool of water with minimal turbulence.

#### Test Conclusions

- All finer debris (smaller than the grating cells) captured on the grating as a result of inertial capture would most likely be washed down when it is subjected to break and/or containment spray flows.
- A significant fraction of the medium pieces would be transported. For break overflows, most of the medium pieces likely would

transport. For containment spray flows, perhaps 50% would transport.

- Erosion of large debris is dependent on both time and flow rate. At low flow rates typical of containment sprays, the erosion of large pieces is negligible, especially considering that containment sprays are operated only intermittently. At water flow rates typical of break flow, the rate of erosion is substantial (as high as 25% for a 3-h duration). For such conditions, an erosion rate of 3 lbm/100-ft<sup>2</sup>/h is recommended.

#### 4.2.3.2 Oskarshamn Nuclear Power Plant Containment Washdown Tests

ABB-Atom conducted experiments at the Oskarshamn BWR nuclear power plant to investigate the transport of insulation material by the containment spray system.<sup>44</sup> After old and new insulation material was spread out on the diaphragm floor between the drywell and the wetwell, the containment spray system was activated. The distribution of the insulation material was determined after the experiments. In these experiments, a maximum of 5% of the material was transported into the wetwell,

The results of these tests have little value, primarily because the type and condition of the debris were not mentioned in the published report. Debris washdown is highly dependent on the type of insulation, the size of the debris, and the placement of the debris relative to the sprays and the vent downcomers. Based on U.S. NRC-sponsored testing, larger pieces of RMI debris placed well away from the inlet to the downcomer likely would have a very low transport fraction; conversely, fine fibrous debris likely would have a much higher transport fraction. These tests are mentioned here for completeness, but more information is needed for these tests to be useful.

#### 4.3 Airborne/Washdown Debris-Transport Analyses

The NRC, U.S. industry, and international organizations have developed methodologies and performed analyses to estimate the airborne and washdown transport of debris within U.S. nuclear power plant containments. The results of these analyses provided qualitative and quantitative insights into the physical processes

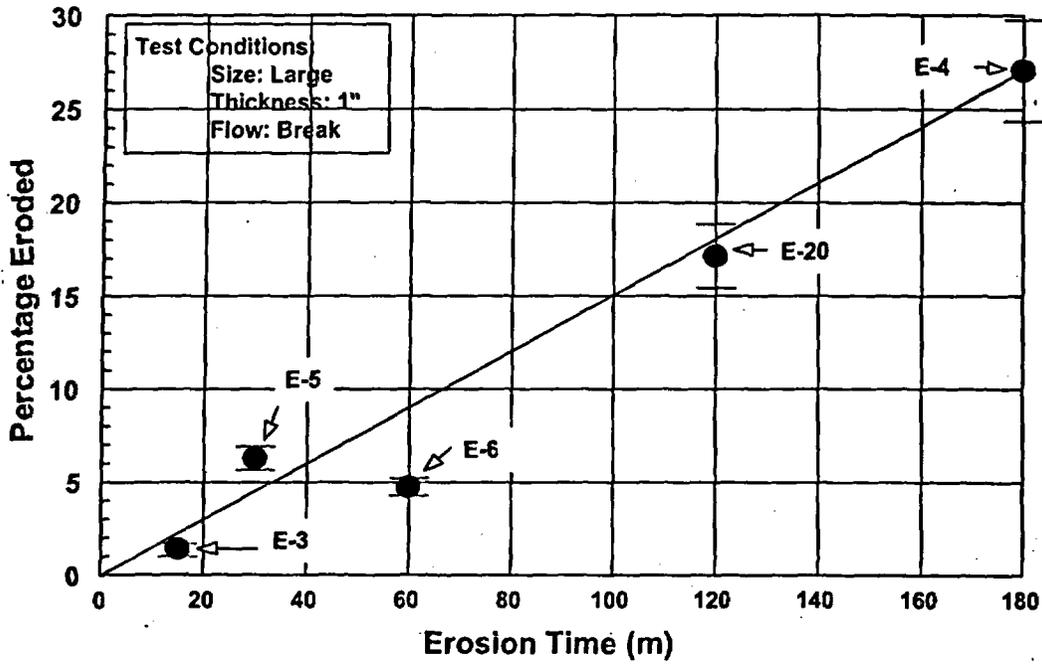


Figure 4-11 Time-Dependency of 1-in. Insulation Blanket Material Under Break-Flow Conditions

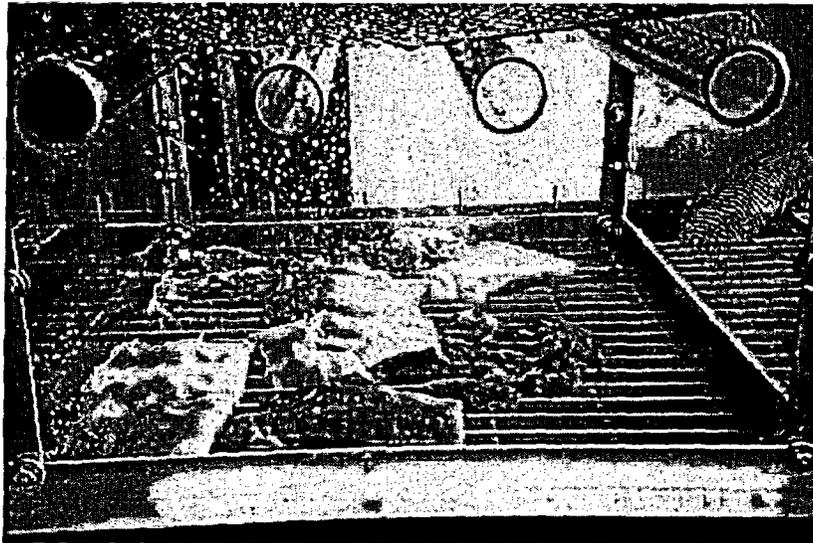


Figure 4-12 Typical Condition of Debris After Exposure to Water

and phenomena that govern debris transport. As mentioned earlier, much of this information was obtained specifically to support the resolution of the BWR strainer blockage issue; however, that information also is directly applicable to the PWR sump-screen blockage issue for the most part.

The analyses pertinent to airborne/washdown debris transport are listed in Table 4-8. These analyses include the following:

- Brief evaluations of operational incidents that occurred at the Gundremmingen-1 nuclear power plant (1977) in Germany and at the Barsebäck-2 nuclear power plant (1992) in Sweden in which insulation debris was generated and transported. These incidences both occurred at plants that had similarities to U.S. BWR plants (Section 4.3.1).
- The NRC sponsored the development of debris-transport PIRTs for both BWR and PWR nuclear power plants in the U.S. (Section 4.3.2).
- The Karlshamn debris-transport tests were simulated with the MELCOR code to test the ability of the code to predict the transport of insulation debris (Section 4.3.3.1).
- The NRC sponsored the DDTS to estimate BWR drywell debris-transport fractions using a bounding analysis approach (Section 4.3.3.2).
- The NRC sponsored a detailed analysis of debris generation and transport within a volunteer U.S. PWR nuclear power plant (Section 4.3.3.3).
- The BWROG developed their URG to support utility plant-specific analyses (Section 4.3.4.1).
- The NRC sponsored a parametric evaluation of the potential for sump-screen blockage within operating U.S. PWR plants. The evaluation included a generic estimate of the containment debris-transport fractions (Section 4.3.4.2).

#### 4.3.1 Evaluations of Operational Incidents

##### 4.3.1.1 Evaluation of Incident at Gundremmingen-1

An event occurred at the German BWR reactor Gundremmingen-1 (KRB-1) in 1977 in which the 14 SRVs of the primary circuit opened during a transient.<sup>44</sup> The SRVs were located inside the

containment at a pipe attached to the main steam line between the reactor pressure vessel and the high-pressure turbine. The valves blew directly into the surrounding containment where the pipes had been insulated with fiberglass insulation reinforced with wire mesh and jacketed with sheet zinc. The piping insulation was extensively damaged.

After the incident, approximately 450 m<sup>3</sup> (16,000 ft<sup>3</sup>) of water was found in the sump; about 240 m<sup>3</sup> (8500 ft<sup>3</sup>) of the water originated in the coolant circuit; the rest was delivered by the CSS. This water transported a substantial quantity of insulation debris into the control drive mechanism compartment directly below the SRVs. The floor was covered with flocks of insulation material, but no larger parts of the insulation, such as sheet metals or textiles, were transported there. A thick layer of fiberglass insulation was found at the strainers installed in front of ducts leading from this compartment into the sump. Because recirculation from the sump was not required, the layer of insulation debris on the strainers had no further consequences. Therefore, it is not known whether recirculation from the sump was possible. No details regarding the quantities of debris generated and transported were made available for further analysis. Nevertheless, the potential for clogging recirculation strainers with insulation debris generated by an operational incident was clearly demonstrated.

##### 4.3.1.2 Evaluation of Incident at Barsebäck-2

An event occurred at the Barsebäck-2 BWR nuclear power plant on July 28, 1992, during a reactor restart procedure after the annual refueling outage.<sup>44</sup> The reactor power was below 2% of nominal when an SRV opened inadvertently because of a leaking pilot valve. The main valve opened when the reactor pressure had reached 3.0 MPa (435 psig). The steam was released as a jet directly into the containment. The containment is basically an upright cylinder with the drywell in the upper part and the wetwell directly beneath. Vertical pressure-relief pipes connect the drywell and the wetwell, and their openings are flush (covered by gratings) with the drywell floor. The containment was isolated when the drywell pressurized, so the blowdown pipes into the wetwell cleared. The containment vessel spraying system and the ECCS were started automatically.

**Table 4-8 Airborne/Washdown Debris-Transport Analyses**

Test Description	Sponsor, Analyst, and Date	Debris Source	Transport Medium	Objectives	Evaluation Products	Reference
<b>Evaluation of Operational Incidences</b>						
1977 Incident at Gundremmingen-1	OECD --- 1996	Damage to Operational Fiberglass Insulation	Inadvertent Opening of 14 SRVs and Containment Sprays	Understand debris transport that occurred during an operational incident at a nuclear power plant.	Qualitative information only. No details regarding quantities of debris generated and transported were made available for analysis. However, the potential for clogging recirculation strainers with insulation debris generated by an operational incident was clearly demonstrated.	NEA/CSNI/R (95) 11
1992 Incident at Barsebäck-2	OECD --- 1996	Damage to Operational Fiberglass Insulation	Inadvertent Opening of SRV and Containment Sprays	Understand debris transport that occurred during an operational incident at a nuclear power plant.	The quantities of debris generated and the dispersion of that debris were estimated. However, the relative quantities transported by airborne dispersion vs debris washdown could not be determined.	NEA/CSNI/R (95) 11
<b>Phenomena Identification and Ranking Tables (PIRTs)</b>						
BWR PIRT	NRC PIRT Panel 1997	Postulated LOCA-Generated Insulation Debris	BWR LOCAs	Use PIRT process to identify phenomena and to rank their importance as related to transport of LOCA-generated debris within U.S. BWR drywells and advise the NRC staff regarding debris-transport analyses and experimentation.	PIRT tables identified phenomena that could potentially influence debris transport within BWR drywells and ranked them according to their perceived importance with the highest-ranked phenomena clearly flagged.	INEEL/EXT-97-00894
PWR PIRT	NRC PIRT Panel 1999	Postulated LOCA-Generated Insulation Debris	PWR LOCAs	Use PIRT process to identify phenomena and to rank their importance as related to transport of LOCA-generated debris within U.S. PWR containments and advise the NRC staff regarding debris-transport analyses and experimentation.	PIRT tables identified phenomena that could potentially influence debris transport within PWR containments and ranked them according to their perceived importance with the highest-ranked phenomena clearly flagged.	LA-UR-99-3371, Rev. 2

**Table 4-8 Airborne/Washdown Debris-Transport Analyses**

Test Description	Sponsor, Analyst, and Date	Debris Source	Transport Medium	Objectives	Evaluation Products	Reference
<b>Airborne/Washdown Debris-Transport Evaluations</b>						
MELCOR Simulation of 1992 ABB-Atom Karlshamn Tests	SEA SEA 1995	Steam-Blasted Fibrous Debris	Blowdown Steam Jet	Test the ability of the MELCOR code to simulate insulation-debris transport.	The MELCOR code predicted results that compared well with the experimental debris-transport results. However, it was determined that the Karlshamn flow velocities were atypically too slow and that the MELCOR code would not likely perform well at typical flow velocities where inertial impaction would be a primary deposition mechanism because MELCOR does not model inertial impaction.	SEA-95-970-01-A:5
Drywell Debris Transport Study (DDTS)	NRC SEA 1997	BWR LOCA-Generated Debris	LOCA Steam-Water and Containment Sprays	Using a bounding analysis approach, the fractions of postulated LOCA-generated debris that subsequently would be transported to the wetwell were estimated. The analysis considered both the blowdown and the washdown phases.	Transport fractions for fibrous insulation debris were estimated using assumptions appropriate for an upper-bound estimate and a less conservative central estimate. In addition, the study provided engineering insights into debris transport processes that were useful when judging appropriateness of utility-generated debris-transport fractions.	NUREG/CR-6369
PWR Volunteer Plant Analysis	NRC LANL 2002	PWR LOCA-Generated Debris	PWR LOCAs	Develop and demonstrate a methodology for estimating the debris-transport fractions within PWR containments.	Generalized methodology was developed and demonstrated by estimating the transport fractions for a specific LOCA in the volunteer plant.	TBD

**Table 4-8 Airborne/Washdown Debris-Transport Analyses**

Test Description	Sponsor, Analyst, and Date	Debris Source	Transport Medium	Objectives	Evaluation Products	Reference
<b>Generalized Debris-Transport Guidance</b>						
BWROG URG	BWROG BWROG 1996	BWR LOCA- Generated Debris	BWR LOCAs	Provide guidance to the operators of U.S. BWR nuclear power plants regarding the resolution of the BWR strainer blockage issue. This guidance included methodology for estimating the drywell debris transport fractions.	The URG for ECCS Suction Strainer Blockage was developed. (The NRC staff subsequently reviewed the URG; their review comments noted where they agreed or did not agree with the URG.)	NEDO- 32686
Transport Fractions for Parametric Evaluation	NRC LANL 2002	PWR LOCA- Generated Debris	PWR LOCAs	Generic composite debris-transport fractions were estimated to support the parametric evaluation of the potential for sump-screen blockage in U.S. PWR plants.	A set of transport fractions was estimated based on both documented research and on-going research that could be applied in a generic fashion to all U.S. PWR plants for the specific purposes of the parametric evaluation and therefore are not generally applicable to plant-specific analyses. These transport fractions, defined as the fraction of the ZOI insulation subsequently transported to the sump screen, tended to favor the plant situation and thus should not be treated as conservative.	NUREG/CR- 6762

About 200 kg (440 lb) of fibrous insulation debris was generated and about 50% of this debris subsequently reached the wetwell, resulting in a large pressure loss at the strainers about 70 min after the beginning of the event. Gratings in the drywell did not hold back the insulation material effectively. The approximate distribution of insulation debris within the drywell following the event was

- 50% on the beamwork, mainly concentrated in three areas: inside the drywell "gutter," near the outer containment wall, and on or near the grid plates over the blowdown pipes;
- 20% on the wall next to the affected pipe, from which most of the insulation originated, and on the components around the safety valve;
- 10% on the wall opposite the affected pipe;
- 12% on the walls above the grating lying above the safety valve; and
- 8% on the grating above the safety valve.

The debris was transported by steam and airflow generated by the blowdown and by water from the CSS. It could not be determined how the transport developed with respect to time and whether the blowdown or washdown processes transported the major part of the debris found in the wetwell.

The generation and transport of large amounts of fibrous debris by the simple erroneous opening of a safety valve were observed. The transport included the short-term transport resulting from the steam and air blast and the longer-term washdown transport associated with operation of the containment spray system. The extent of damage and of transport appeared to be remarkably large given the small leak size and low reactor pressure. The locations of debris on such surfaces as the walls suggest the significance of inertial impaction as a deposition mechanism near the location of the break.

#### **4.3.2 Phenomena Identification and Ranking Tables**

##### **4.3.2.1 BWR PIRT**

The NRC sponsored the formation of a PIRT panel of recognized experts with broad-based knowledge and experience to identify and rank the phenomena and processes associated with the transport of break-generated debris through a BWR containment drywell following the

initiation of one or more accident sequences.<sup>4-2</sup> The primary objective of the BWR PIRT was to support the DDTs, which is discussed in Section 4.3.3.2. The PIRT process was designed to enhance the DDTs analysis by identifying processes and phenomena that would dominate debris-transport behavior. Further, these processes and phenomena were prioritized with respect to their contributions to the reactor phenomenological response to the accident scenario. The PIRT panel also evaluated the plans for experimental research, the experimental results, and the analytical results. Their final report was updated to reflect the final results of the DDTs. The phenomena ranked as having the highest importance with respect to debris transport within a BWR drywell are listed in Table 4-9.

##### **4.3.2.2 PWR PIRT**

Like the BWR PIRTs discussed in Section 4.3.2.1, the NRC sponsored the formation of a PIRT panel of recognized experts with broad-based knowledge and experience to identify and rank the phenomena and processes associated with the transport of debris in PWR containments following the initiation of one or more accident sequences.<sup>4-1</sup> The PWR PIRT has been used to support decision-making regarding analytical, experimental, and modeling efforts related to debris transport within PWR containments.

A modest database of experimental and technical results existed to support this PIRT effort. The PIRT panel initially focused on a Westinghouse four-loop PWR with a large dry ambient containment as the base configuration and a double-ended, cold-leg, large-break LOCA for the baseline scenario. Following the initial effort, the PWR PIRT considered the other two existing U.S. PWR containment designs, i.e., the sub-atmospheric and ice condenser containments. The event scenario was divided into three time phases: blowdown between event initiation and 40 s, post-blowdown between 40 s and 30 min, and sump operation between 30 min and 2 days. Each phase was characterized with respect to physical conditions, key phenomena and processes, and equipment operation. The containment was partitioned into three components:

- the containment open areas, excluding the potential pool in the bottom of the

Table 4-9 Highly Ranked Phenomenon from BWR Drywell Transport PIRT Table	
Processes and/or Phenomena	Description
Pressure-Driven Flows	These flows represent the bulk flows, i.e., the net or macroscopic flow characteristics of the containment atmosphere.
Localized Flow Fields	Flow direction and/or velocities that differ from the bulk atmosphere flow characteristics because of localized geometries.
Liquid Flashing	Liquid to vapor phase transformation because of expansion across choked break plane.
Recirculation Deluge (Steaming)	Large flow rate of liquid effluent from a low-elevation break in the reactor coolant system (e.g., recirculation line) onto drywell structures or from sprays when activated.
ECCS Deluge	Large flow rate of liquid effluent from ECCS onto drywell structures.
Drywell Floor Pool Formation, Overflow, and Flow Dynamics Following Recirculation Line Break	Creation of a water pool on the drywell floor sufficiently deep to allow overflow into wetwell transfer piping. Flow dynamics include multi-dimensional flow patterns and velocities, free-surface behavior, and turbulent mixing.
Surface Wetting	Formation of a liquid film on structure surfaces due to condensation of steam from the atmosphere or impaction of water droplets onto structure surfaces.
Structural Congestion (Porosity)	Variations in fluid flow area and flow as related to the density of the structures in the drywell, and due to the tortuousness of the flow paths around these structures.
Debris Advection/Slip	Transport of airborne debris within the carrier gas medium.
Inertial Impaction	Capture of debris on structure surfaces due to inertial impaction.
Adhesion	Permanent retention of debris particles on a structure surface due to mechanical interactions with a rough surface or other forces.
Recirculation Deluge (Steaming) Related Transport	Relocation of debris from drywell structures due to interactions with the deluge of liquid from recirculation pipe breaks, or sprays.
Debris Transport and Deposition within Pool	Relocation of debris in the drywell floor pool towards the wetwell vent pipe entrances.

- containment and the debris-generating ZOI in the vicinity of the break;
- the containment structures; and
- the containment floor upon which a liquid pool forms in the lower containment elevations.

The panel identified a primary evaluation criterion for judging the relative importance of the phenomena and processes important to PWR-containment debris transport. The criterion was the fraction of debris mass generated by the LOCA that is transported to the sump entrance. Each phenomenon or process identified by the panel was ranked relative to its importance with respect to the transportation of debris to the sump entrance. Highly-ranked phenomena and processes were judged to have a dominant effect with respect to the primary evaluation

criterion. Medium-ranked phenomena and processes were judged to have a moderate effect with respect to the primary evaluation criterion. Low-ranked phenomena and processes were judged to have a small effect with respect to the primary evaluation criterion.

The results of the panel's identification and ranking efforts were tabulated, and all processes and phenomena were ranked according to perceived relative level of importance, i.e., high, medium, or low. (See the PWR-PIRT final report for complete tabulation). The processes ranked as high are shown in Table 4-10. In the table, the processes and phenomena are grouped by accident phase and containment location. Most of the high-importance processes dealt with debris transport on the containment floor, where the sump pool was either forming or

Transport Phase	Containment Component		
	Open Areas	Structures	Floor
Blowdown (0-40 s)	Gravitational settling	None	None
Post-Blowdown (40 s-30 min)	Droplet motions Debris sweepout	Surface draining Deluge transport Disintegration Entrapment	<u>Pool Behavior</u> Formation Agitation Flow dynamics Film entry transport Liquid entry transport Disintegration Settling Transport
Sump Operation	None	None	<u>Pool Behavior</u> Agitation Flow dynamics Sump-induced flow Reentrainment Transport Sump-induced overflow

had already formed. (These processes and phenomena are the subject of Section 5.) Only seven processes were listed with high importance for the containment above the sump pool, which is the subject of this section. Definitions of these seven processes are provided in Table 4-11.

During blowdown, gravitational settling of large pieces of debris generated by the break-jet flow was ranked as high. During post-blowdown, the four processes associated with the containment above the sump pool deal with debris washdown by the containment sprays. During the sump-operation phase, no processes were ranked as high except those dealing with sump-floor debris transport.

#### 4.3.3 Airborne/Washdown Debris-Transport Evaluations

##### 4.3.3.1 MELCOR Simulation of Karlshamn Tests

Using the MELCOR code, SEA simulated one of the Karlshamn tests to demonstrate the ability of the code to simulate insulation debris transport.<sup>4,8</sup> As discussed in Section 4.2.1.4, these tests were conducted in a small-scale test

assembly, shown schematically in Figure 4-7, that was subdivided into a few inner volumes. A steam jet was used to fragment insulation and disperse its debris within the test apparatus. Most of the fibrous insulation debris was distributed in the upper parts of the test apparatus. The gratings held debris back, debris adhered to walls where steam condensed, and debris accumulated in areas of low flow velocity.

The MELCOR code, which was developed at Sandia National Laboratories for the NRC, is a fully integrated computer code that models the progression of severe accidents in LWR nuclear power plants.<sup>4,9</sup> Thermal-hydraulic behavior is modeled with a lumped-parameter approach using control volumes connected by flow paths. Each volume is defined spatially by its volume vs altitude; may contain a gravitationally separated pool of single- or two-phase water; and can have an atmosphere consisting of any combination of water vapor, suspended water droplets, or noncondensable gases. Noncondensable gases are modeled as ideal gases with temperature-dependent specific heat capacities. The flow paths connect volumes and define paths for moving hydrodynamic materials.

<b>Processes and/or Phenomena</b>	<b>Description</b>
Gravitational Settling	Downward relocation (sedimentation) of debris in the containment atmosphere onto structure surfaces under the force of gravity.
Droplet Motions	Movement of droplets introduced into containment by the spray system.
Debris Sweepout	Transport of debris through the containment by liquid droplets from the containment spray system.
Surface Draining	Movement of liquid streams from higher elevations to lower elevations.
Deluge Transport	Relocation of debris from containment structures as a result of interactions with the deluge of liquid from the ECCS and spray system.
Disintegration	Breakup of relatively large pieces of debris into smaller particles that can be reentrained into the flow stream caused by the impact of falling liquid streams from the break, fan coolers, and liquid draining off surfaces.
Entrapment	Capture of debris in local structural "pooling points," i.e., locations that allow the accumulation and storage of draining condensate and associated transported debris.

The governing thermal-hydraulic equations conserve mass, momentum, and energy. The MELCOR code contains models to predict the transport and behavior of aerosols that directly couple to the thermal-hydraulic models. The aerosol deposition processes modeled include gravity, diffusion, thermophoresis, and diffusiophoresis.

The MELCOR code results compared well with the experimental results; however, this high degree of comparability does not extend to the conditions typical of postulated LOCAs. The peak bulk flow velocities in the Karlshamn tests were about 1 m/s, whereas the transport velocities were much faster following a postulated LOCA in an actual plant. The atypically slow flow velocities in the Karlshamn tests allowed the debris to settle gravitationally at all levels, whereas at typical transport velocities, the flow turbulence generally would be much too high to allow settling anywhere near the break. After break flows disperse sufficiently into compartments well away from the break, flow velocities and turbulence can be expected to slow sufficiently to allow gravitational settling as was seen in the Karlshamn tests. Thus, the Karlshamn tests might be considered representative of debris transport in some areas of PWR containments, but not in the region of the break. Alternatively, the Karlshamn results might be representative of debris transport following very small LOCAs.

After a complete review of the Karlshamn simulation, it was concluded that although the MELCOR code did a good job of predicting debris transport within the Karlshamn tests apparatus, the code could not reliably be used to predict debris transport within a containment where the flow velocities and flow turbulence would be too high to allow significant debris settling. Also, it should be noted that the MELCOR code does not model inertial impaction of an aerosol, which would be substantial near the break region of the containment. Therefore, system-level codes such as MELCOR were used to estimate thermal-hydraulic conditions within a containment following a LOCA, but not to predict debris transport.

#### **4.3.3.2 BWR Drywell Debris Transport Study (DDTS)**

In September 1996, the NRC initiated a study, referred to as the DDTS, to investigate the transport and capture characteristics of debris in BWR drywells using a bounding analysis approach. Understanding the relatively complex drywell debris-transport processes was an essential aspect of predicting the potential for strainer clogging in the estimation of debris transport in the drywell. These processes involve the transport of debris during both the reactor blowdown phase through entrainment in steam/gas flows and the post-blowdown phase

by water flowing out of the break and/or containment sprays. The erosion characteristics of debris caused by air and water flows must also be considered. The focus of the DDTS was to provide a description of the important phenomena and plant features that control or dominate debris transport and the relative importance of each phenomenon as a function of the debris size. Further, these analyses were to demonstrate calculational methodologies that can be applied to plant-specific debris-transport estimates. It also should be noted that the DDTS focused almost entirely on the transport of LDFG insulation debris.

Because of its complexity, the problem was broken into several individual steps. Each step was studied either experimentally or analytically, and engineering judgment was applied where applicable data were not available. The results of the individual steps were quantified using a logic-chart approach to determine transport fractions for (1) each debris size classification, (2) each BWR containment design, (3) both upper bound and central estimates, and (4) each accident scenario studied. The complexity is illustrated in Figure 4-13 for both the blowdown and washdown phases.

Upper bound estimates provide transport fractions that are extremely unlikely to be exceeded. Because each upper bound estimate represents the compounding of upper bound estimates for each individual step, the overall upper bound transport fractions are highly conservative. The central estimates were developed using a more realistic, yet conservative, representation of each individual step. Although the central-estimate transport fractions were deemed closer to reality, the estimates lacked the assurance of not being exceeded under any accident condition.

Early in the study the thermal and hydraulic conditions that would govern debris transport were analytically assessed by performing end-to-end scoping calculations that encompassed the possible debris-transport and capture processes. These calculations included both a series of hand computations and system-level computer code calculations (i.e., MELCOR, RELAP, and CFD). All calculations were designed to examine selected specific aspects of the overall problem. The calculation results were used to subdivide the problem into several components that could be solved individually

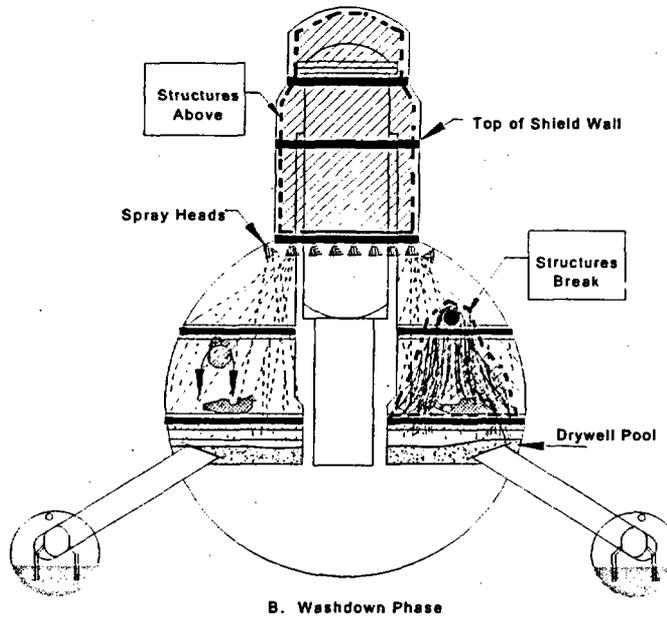
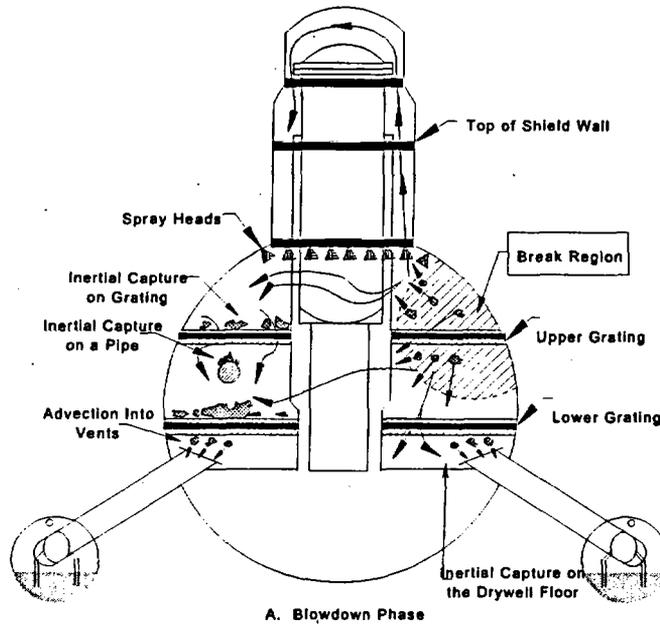
through the separate-effects experiments, analytical modeling, and engineering calculations. The calculations also identified vital database elements necessary to quantify transport.

Experiments and further analytical studies were undertaken to provide a basis for quantifying debris transport during blowdown, washdown of debris by ECCS water flow, and debris sedimentation on the drywell floor. In particular, three sets of experiments, which are discussed in Section 4.2, were designed and conducted as part of this study. Detailed CFD simulations were used to determine likely flow patterns that would exist on the drywell floor during ECCS recirculation and the likelihood of debris sedimentation under these conditions.

Transport fractions were estimated for each of the BWR containment designs (i.e., Mark I, Mark II, and Mark III) for a spectrum of postulated accident scenarios. Two major types of piping breaks were studied: main steam line (MSL) breaks and recirculation line (RL) breaks. Both throttled and unthrottled ECCS break overflow was considered. Containment sprays were considered to operate intermittently or not at all.

A simplified logic-chart method was chosen to integrate the problem subcomponents into a comprehensive study. An example logic chart is shown in Figure 4-14. A separate logic chart was generated for each scenario and each containment design. Individual steps in the logic charts were solved using available knowledge tempered by conservative engineering judgment. Finally, the logic charts were quantified and the results were tabulated.

The logic chart subdivides the problem into five independent steps: (1) LOCA type, (2) debris classification, (3) debris distribution after blowdown, (4) erosion and washdown, and (5) sedimentation in the drywell floor pool. Because the debris size distribution was not within the scope of this study, a size distribution from a BWROG study<sup>4,6</sup> was used in the DDTS to illustrate the computation of overall debris-transport fractions. Four size classifications are shown in the chart: small, large-above, large-below, and canvassed. Because large debris does not pass through floor grating, the large debris classification was subdivided into debris formed above any grating and debris formed below all gratings. Overall transport fractions were applied to all insulation within the ZOI.



**Figure 4-13 Schematic Illustrating the Complexity of Drywell Debris Transport**

LOCA Type	Debris Classification	Distribution After Blowdown	Erosion and Washdown	Drywell Floor Pool	Path No.	Fraction	Final Location	
MARK I CENTRAL ESTIMATE MSL BREAK ECCS THROTTLED SPRAYS OPERATED FIBROUS INSULATION	Small Pieces 0.22	Adverted to Vents			1	1.144E-01	Vents	
		0.52 Enclosures			2	2.200E-03	Enclosures	
		0.01		Waterborne	3	0.000E+00	Vents	
		Drywell Floor		0.00				
		0.01		Sediment	4	2.200E-03	Floor	
					1.00			
				Waterborne	5	8.800E-07	Vents	
				0.01				
			Condensate Drainage		Sediment	6	8.712E-05	Floor
		Structures-Above	0.01		0.99			
		0.04	Adheres			7	8.712E-03	Structures-Above
			0.99		Waterborne	8	1.100E-04	Vents
					0.01			
			Sprays/Condensate		Sediment	9	1.089E-02	Floor
		Structures-Break	0.30		0.99			
		0.10	Adheres			10	1.100E-02	Structures-Break
			0.50		Waterborne	11	3.520E-04	Vents
					0.01			
			Sprays/Condensate		Sediment	12	3.485E-02	Floor
		Structures-Other	0.50		0.99			
		0.32	Adheres			13	3.520E-02	Structures-Other
			0.50		Waterborne	14	5.100E-04	Vents
					1.00			
			Sprays/Condensate		Sediment	15	0.000E+00	Floor
		Structures-Break	0.01		0.00			
		0.15	Adheres			16	5.049E-02	Structures-Break
			0.99		Waterborne	17	2.890E-03	Vents
					1.00			
			Sprays/Condensate		Sediment	18	0.000E+00	Floor
		Structures-Other	0.01		0.00			
0.34	Adheres			19	2.861E-01	Structures-Other		
	0.85		0.99					
MSL Break		Adverted to Vent			20	3.680E-02	Vents	
1.00		0.90 Enclosures			21	4.000E-04	Enclosures	
	Large-Below	0.01		Waterborne	22	0.000E+00	Vents	
	0.04	Drywell Floor		0.00				
		0.04		Sediment	23	1.600E-03	Floor	
				1.00				
			Waterborne	24	0.000E+00	Vents		
			0.00					
		Sprays/Condensate		Sediment	25	4.000E-06	Floor	
Structures-Break	0.01		1.00					
0.01	Adheres			26	3.960E-04	Structures-Break		
	0.99		Waterborne	27	0.000E+00	Vents		
			0.00					
		Sprays/Condensate		Sediment	28	1.600E-05	Floor	
Structures-Other	0.01		1.00					
0.04	Adheres			29	1.584E-03	Structures-Other		
			0.99					
Canvassed					30	4.000E-01	Structures/Floor	
0.40					Total	1.000E+00		

Figure 4-14 Sample Drywell Debris Transport Logic Chart

Accordingly, the canvassed classification included intact blankets located within the ZOI. The third column shows where the debris is expected to reside following the end of blowdown. Drywell structures were divided according to location in the drywell:

- structures located above the containment spray heads (which are not subject to spray flows),
- structures located directly below the break (which can be subjected to recirculation break flows), and
- all other structures subjected to sprays but not to break flows.

Additionally, small debris can be deposited directly onto the floor by mechanisms such as vent capture or entrapment within an enclosure such as the reactor cavity. Large debris generated above any grating was assumed to reside on a grating either below the break or not below the break. Large debris deposited above the spray heads or in enclosures was not considered credible. Each branch in the erosion and washdown column simply calculated the amounts of captured debris that remained on the structures after being subjected to the appropriate washdown flows (i.e., recirculation break flow, containment spray flow, and condensate drainage). Similarly, each branch in the drywell floor pool column asks how much of the debris settles to the floor and remains there.

Analyses supporting the DDTs included a variety of calculations designed to examine selected specific aspects of the overall problem. These included hand calculations, system-level code calculations, and CFD calculations. The computer code calculations that were performed in support of the DDTs are described in the following paragraphs.

#### MELCOR Code Calculations

The MELCOR computer code was used to examine the thermal-hydraulic conditions within the drywell following a postulated LOCA. The simulations were based on the BWR Mark I reference plant analyzed during the NUREG/CR-6224 strainer-blockage study.<sup>4-10</sup> Insights were obtained regarding containment pressures and temperatures, bulk flow velocities, the time required to clear the vent downcomer of water, rate of steam condensation on drywell structures and

subsequent thickness of films, rate of accumulation of water on the drywell floor, and transport of noncondensable gases to the wetwell. Several key observations were made of these MELCOR calculations, including those in the following list.

- The drywell pressure increased rapidly to about 3 atm (44 psia) in about 1 s, corresponding to the clearing of the downcomer vents. Further pressurization was prevented by the pressure-suppression system. After a relatively short period of 5 to 10 s, the pressures decreased again.
- The water in the downcomer vent pipes was purged from the pipes in about 1 s.
- Steam immediately condensed upon contact with surface structures until the temperature of the surface equilibrated with the steam environment. For example, the total rate of condensation within the drywell for the high MSL break peaked at 1170 lbm/s at about 2.5 s.
- Water films with a thickness of 200 to 400  $\mu\text{m}$  accumulated on the structures in as little time as 1 s, depending on the location of the surface relative to the pipe break.
- Peak flow velocities as high as 820 ft/s were found near the break, and flow velocities through the vent downcomer pipes exceeded 660 ft/s. Elsewhere in the drywell, the velocities varied considerably from one location to another.
- The majority of the nitrogen gas initially located in the drywell was forced into the wetwell in about 3 s. The residence time for a tracer gas injected into the drywell along with the break source was generally less than 2 s.
- A pool of water accumulated on the drywell floor and in the reactor cavity sumps, as was expected. In the MSL breaks, the pool would not overflow into the downcomer vent pipes because the depth of the water was only about a quarter of the depth required to overflow. In the recirculation line break (RLB), the results were considerably different. The overflow through the downcomer vent began at 5 s for the low RLB. The asymmetrical pressures acting on the drywell floor pool pushed the accumulated water to the backside of the pedestal from the break; after the drywell pressures peaked, the pool became two-phased. The raised water level caused the

water to overflow into the vents at the backside. The drywell pool leveled out again after the primary system was depressurized.

#### RELAP Code Calculations

Calculations were performed with the RELAP computer code to characterize the break flow, (i.e., rate of flow and thermodynamic state as a function of time). Following a main steam line break (MSLB), essentially dry steam expands into the containment. The steam mass-flow rate falls from an initial value of close to 6000 lbm/s (assuming blowdown from both ends of the broken pipe) to about 1000 lbm/s within a period of 50 s, whereas the steam velocity remains essentially at the sonic velocity of about 700 ft/s. Water enters the drywell in the form of fine droplets (approximately 5  $\mu\text{m}$ ) of entrained water, but the water content is not likely to be large enough to completely wet the debris during its generation.

Following an RLB, the initial flow would be mainly water, but after a period of 5 to 10 s, a mixture of water and steam is discharged at high velocities. During this phase, the dynamic pressures far outweigh the corresponding pressures during the initial 5 s after the break. Because the debris generation is proportional to the dynamic pressure, these results suggest that for an RLB, most of the fibrous insulation debris will be produced in the later stages of the accident. The total mass flow rate remains fairly high (approximately 20,000 lbm/s) throughout the blowdown phase of an RLB compared with the flow rate for a similar size MSLB; however, the water content of the exit flow is very large. In these conditions, it is expected that all of the structures located in the path of the jet will be drenched with water, and the insulation materials in the vicinity of the break are likely to be thoroughly wet before the break jet produces significant debris. Additionally, it is likely that the majority of the debris generated will follow the steam component of the break flow rather than the liquid component. The DDTS assumed that 80% of the debris would be transported with the steam and 20% would be transported with the water.

#### CFD Calculations

Substantial quantities of insulation debris could land on the drywell floor during the primary

system depressurization or be washed down to the drywell floor from drywell structures after being captured during depressurization. From there, the debris could be transported from the floor into the vent downcomers. Therefore, determining the potential for debris to remain captured on the floor was a necessary step in the overall debris-transport study. This determination was made based on simulating the drywell floor pool for a variety of conditions using a commercially available CFD code. The primary objective of this analysis was to evaluate the potential for fibrous debris to settle in drywell pools and to estimate the fractions of the debris that would be transported to the suppression pool. The study considered Mark I, II, and III designs for variations in pool depth and entrance conditions to the pools.

The CFD results needed to be benchmarked to prototypical experimental data to correlate pool turbulence levels with the conditions that allowed debris to settle. This was accomplished by simulating the ARL Pennsylvania Power and Light Company (PP&L) flume tests with the CFD code and then correlating the code-predicted turbulence level for a given test with the PP&L test results that showed whether fibrous debris actually settled in each test. The PP&L flume tests are documented in "Results of Hydraulic Tests on ECCS Strainer Blockage and Material Transport in a BWR Suppression Pool" (1994).<sup>4-11</sup> The maximum levels of turbulence that allowed debris to settle were determined and applied to the drywell floor pool simulation results. Two maximum levels were determined, one for small debris and one for large debris.

The results of each of the drywell floor pool simulations consisted of graphical pictures of pool flow behavior, such as two- and three-dimensional color pictures of flow velocities and flow turbulence in the form of specific kinetic energy. These turbulence levels then were compared with the maximum levels for debris settling determined by the code calibration. If pool turbulence were higher than the levels found to keep debris in suspension, then debris would not likely settle. On the basis of this graphical data, engineering judgment was used to determine the likelihood for debris settling for each pool configuration. With noted design-specific exceptions, drywell floor pools formed by recirculation break flows are considered likely to transport the majority of insulation debris into

the vent downcomers, and pools formed by the containment sprays are likely to retain debris.

#### Debris Transport Quantification Results

A summary of the upper bound and central estimated transport fractions for a postulated LOCA in the mid-region of the drywell are presented in Tables 4-12 and 4-13 for the MSLBs and the RLBs. As previously noted, the DDTs focused on the transport of LDFG insulation debris. A complete set of results can be found in Ref. 4-3.

The central estimate transport fractions shown in Table 4-12 are the fractions for the MSLB scenarios in which the operators throttle the ECCS back to the steaming mode and the containment sprays are operated intermittently. This scenario was chosen for summary purposes because it is the most likely scenario that operators would follow. Conversely, the upper bound estimate transport fractions in Table 4-12 are the fractions for the MSLB scenarios in which the ECCS is not throttled back to the steaming mode and the sprays are operated. This scenario was chosen for the upper bound estimate because it represents the worst-case scenario in terms of debris transport. Similarly, the transport fractions shown in the Table 4-13 summary for RLB scenarios are those for ECCS throttling and spray operation

for the central estimates and no throttling and spray operation for the upper bound.

Transport fractions corresponding to Tables 4-12 and 4-13 for all of the insulation initially located within the ZOI are provided in Table 4-14. These transport fractions were determined using the BWROG debris-size distribution of 0.22, 0.38, and 0.40 for small, large, and canvassed debris. The large debris was subdivided further into large-above and large-below categories using engineering judgment. These subdivisions were 80% and 90% above the grating for the central and upper bound estimates, respectively.

Several general conclusions can be drawn from these results.

- The total fraction of debris transported depends strongly on the assumed size distribution of the debris and the location of the break.
- Small debris readily transports toward vent entrances with a substantial amount captured, primarily by the gratings.
- A majority of the large debris generated above any grating is not likely to transport to the vents.
- A majority of the large debris generated below all gratings will likely transport into the vents.

**Table 4-12 Study Transport Fractions for Main-Steam-Line Breaks**

Plant Design	Central Estimate			Upper Bound Estimate		
	Small Debris	Large Debris		Small Debris	Large Debris	
		Above Any Grating	Below All Gratings		Above Any Grating	Below All Gratings
Mark I	0.52	0.01	0.90	1.0	0.05	1.0
Mark II	0.74	0.01	0.90	1.0	0.05	1.0
Mark III	0.55	0	0.90	0.93	0.03	1.0

**Table 4-13 Study Transport Fractions for Recirculation Line Breaks**

Plant Design	Central Estimate			Upper Bound Estimate		
	Small Debris	Large Debris		Small Debris	Large Debris	
		Above Any Grating	Below All Gratings		Above Any Grating	Below All Gratings
Mark I	0.86	0.02	0.94	1.0	0.30	1.0
Mark II	0.89	0.02	0.95	1.0	0.30	1.0
Mark III	0.72	0.01	0.90	1.0	0.30	1.0

Plant Design	Main-Steam-Line Break		Recirculation-Line Break	
	Central	Upper Bound	Central	Upper Bound
Mark I	0.15	0.31	0.23	0.39
Mark II	0.20	0.31	0.24	0.39
Mark III	0.16	0.29	0.20	0.39

The study concluded that the URG-recommended transport fractions for Mark II containments underestimate debris transport. For Mark I and Mark III drywells, the study concluded that the URG appears to provide reasonable estimates, provided the plant contains a continuous lower grating with no large holes. However, although the RG 1.82, Rev. 2 recommended assumption of 100% transport of transportable debris was found to provide a reasonable upper bound for breaks located below the lowest grating, the recommendation greatly overestimates debris transport for breaks located above the lowest grating. Finally, the study concluded that licensees should pay close attention to plant features that are unique to their plant and how they were modeled in this study. If necessary, the logic charts provided in this study can easily be modified to account for plant-specific features, such as number and arrangement of floor gratings. They also are flexible enough to accommodate new evidence and assumptions related to debris size and distribution.

The DDTS is documented in the three-volume NUREG/CR-6369 report.<sup>4-3</sup> The main volume, Volume 1, summarizes the overall study, in particular, the debris-transport quantification and transport fractions. The experiments conducted to support this study are documented in detail in Volume 2. The analyses conducted to support this study are documented in detail in Volume 3. The DDTS reports provide reasonable engineering insights that can be used to evaluate the adequacy of the debris-transport fractions used in the utility strainer-blockage analyses.

#### 4.3.3.3 PWR Volunteer Plant Analysis

The primary objective of this analysis was to develop and demonstrate an effective methodology for estimating containment debris transport that could be used to assess the debris transport within PWR plants. The transport

analysis consisted of airborne debris transport, where the effluences from a high-energy pipe break would destroy insulation near the break and then transport that debris throughout the containment, and washdown debris transport caused by operation of the containment sprays. The airborne/washdown debris-transport analysis provides the source term for the sump-pool debris-transport analysis.

The volunteer plant chosen for detailed analysis has a large, dry cylindrical containment with a hemispherical dome constructed of steel-lined reinforced concrete with a free volume of approximately 3 million cubic feet. The nuclear steam supply system is a Westinghouse reactor with four steam generators. Each of the steam generators is housed in a separate compartment that vents upward into the dome. Approximately 2/3 of the free space within the containment is located in the upper dome region, which is relatively free of equipment. The lower part of the containment is compartmentalized. The internal structures are supported independently so that a circumferential gap exists between the internal structures and the steel containment liner. Numerous pathways, including the circumferential gap, interconnect the lower compartments.

The containment spray system has spray train headers at four different levels, but about 70% of the spray nozzles are located in the upper dome. The compartments in the lower levels are not covered completely by the spray system, including even the compartments containing spray heads. Therefore, significant areas exist where debris washdown by the sprays would not occur. The sprays activate when the containment pressure exceeds 18.2 psig. If the sprays do not activate, debris washdown likely would be minimal.

The insulation composition for the volunteer plant is roughly 13% LDFG, 86% RMI, and 1% Min-K. The volunteer plant analysis focused on

debris transport for LDFG insulation because LDFG insulation debris causes much more head loss on a sump screen than does a comparable amount of RMI insulation debris, and there was relatively little Min-K in the containment. (Although the analysis focused on the transport of LDFG insulation debris, the transport of the RMI and Min-k insulation debris were also estimated.)

The LDFG debris in the volunteer plant analysis was subdivided into four categories; the transport of each category of debris was treated separately. All insulation located within the break-region ZOI is assumed to be damaged to some extent. The damage could range from the total destruction of a blanket, with all of its insulation turned into small or very fine debris, to the blanket being only slightly damaged and even remaining attached to its piping, perhaps with some insulation erosion occurring through a rip in the blanket cover. The four categories and their properties are shown in Table 4-15.

The primary difference between the two smaller categories and the two larger categories was whether the debris was likely to pass through a grating. The fines were then distinguished from the small pieces because the fines would tend to remain in suspension in the sump pool under even relatively quiescent conditions, whereas the small pieces would tend to sink. Further, the fines tend to transport a little more like an aerosol in the containment air/steam flows and are less quick to settle when airflow turbulence drops off than the small pieces. The distinguishing difference between the large and intact debris was whether the blanket covering was still protecting the LDFG insulation. The primary reason for this distinction was whether the containment sprays could erode the insulation material further. Estimates were made for a distribution among the four categories based on available data and previously accepted engineering judgments. (The database for LOCA generated debris size distributions is sparse.)

The debris-transport methodology decomposed the overall transport problem into many smaller problems that were either amenable to solution or could be judged conservatively in a manner similar to that used in the DDTs (see Section 4.3.3.2).<sup>4-3</sup> The volunteer plant PWR debris-transport methodology necessarily differed from the DDTs BWR transport methodology because

of differences in plant designs. Because debris will for the most part travel with the effluences from the break, a majority of the debris not captured in the break region likely would be blown upward into the dome region.

Conversely, in the DDTs study, the break effluences flowed predominantly to the suppression pool. Although debris blown into the upper compartment may be washed back down into the lower compartment by the containment sprays, the washdown pathway can be a tortuous one that certainly could result in substantial debris entrapment.

The DDTs methodology of using logic charts to decompose the transport problem in the volunteer plant worked well within the region of the break. However, outside the region of the break, the complexity of the lower region inner compartments made that approach unreasonable. Therefore, in the volunteer plant analysis, debris capture was estimated first in the break region using the logic chart approach, and then a less sophisticated approach was used for the remaining containment.

In the region of the break, the MELCOR code was used to determine the distribution of flows from the region. Based on the reasoning that fine and small debris will disperse relatively uniformly with the flows and, to a lesser extent, the large debris, the MELCOR flow distributions become the dispersion distributions. Debris capture along these flow pathways was estimated using appropriate capture fractions; e.g., the debris capture fractions for debris passing through gratings were measured. (See Sections 4.2.1.1 and 4.2.1.2.) Another example of debris capture that can be readily justified is debris capture at the personnel access doorways between the steam generator compartments and the sump annulus. Here, the flow must make either one or two 90° bends, and it was determined and measured experimentally that debris would be captured onto a wetted surface at a sharp bend in the flow.

Outside the region of the break, the containment free volume was subdivided into a number of regions based on geometry and the locations of the containment sprays. Within each volume region, the surface area was subdivided according to both its orientation and its exposure to wetness. Because debris gravitationally settles onto horizontal surfaces, the floor areas

**Table 4-15 Debris Size Categories and Their Capture and Retention Properties**

Fraction Variable	Size	Description	Airborne Behavior	Waterborne Behavior	Debris Capture Mechanisms	Requirements for Crediting Retention
D <sub>F</sub>	Fines	Individual fibers or small groups of fibers.	Readily moves with airflows and slow to settle out of air even after completion of blowdown.	Easily remains suspended in water, even relatively quiescent water.	Inertial impaction Diffusiophoresis Diffusion Gravitational settling Spray washout	Must be deposited onto surface not subsequently subjected to containment sprays or to spray drainage. Note that natural circulation airflow likely will transport residual airborne debris into a sprayed region. Retention in quiescent pools without significant flow through the pool may be possible.
D <sub>S</sub>	Small Pieces	Pieces of debris that easily pass through gratings.	Readily moves with depressurization airflows and tends to settle out when airflows slow.	Readily sinks in hot water, then transports along the floor when flow velocities and pool turbulence are sufficient. Debris subject to subsequent erosion by flow water and turbulent pool agitation.	Inertial impaction Gravitational settling Spray washout	Must be deposited onto surface not subsequently subjected to high rates of containment sprays or to substantial drainage of spray water. Retention in quiescent pools (e.g., reactor cavity). Debris subject to subsequent erosion.
D <sub>L</sub>	Large Pieces	Pieces of debris that do not easily pass through gratings.	Transports with dynamic depressurization flows but generally stopped by gratings.	Readily sinks in hot water and can transport along the floor at faster flow velocities. Debris subject to subsequent erosion by flow water and by turbulent pool agitation.	Trapped by structures (e.g., gratings) Gravitational settling	Must be either firmly captured by structure or on a floor where spray drainage and/or pool flow velocities are not sufficient to move the object. Debris subject to subsequent erosion.
D <sub>I</sub>	Intact	Damaged but relatively intact pillows.	Transports with dynamic depressurization flows or may remain attached to its piping.	Readily sinks in hot water and can transport along the floor at faster flow velocities. Debris assumed still encased in its cover and thereby not subject to significant subsequent erosion by flow water and turbulent pool agitation.	Trapped by structures (e.g., gratings) Gravitational settling Not detached from piping	Must be firmly captured either by a structure or on a floor where spray drainage and/or pool flow velocities are not sufficient to move the object. Intact debris subsequently would not erode because of its encasement.

were treated separately from the other areas. The exposure to wetness determines the extent of debris washdown; therefore, areas subjected to containment sprays were treated differently than areas simply wetted by steam condensation. As the containment pressurizes following a LOCA, break flows carrying debris would enter all free volumes within the containment. Larger debris would tend to settle out of the break flows as the flow slowed down after leaving the break region. However, the fine and smaller debris more likely would remain entrained so that it would be distributed more uniformly throughout the containment. In the volunteer plant analysis, the fine and small debris was distributed according to free volume. The larger debris was distributed according to where it would fall out of the flow as the flow slowed. After the debris was dispersed to a volume region, it was assumed to have deposited within that region. The surface area distribution fractions were estimated using the areas tempered by engineering judgment.

Debris deposited throughout the containment subsequently would be subject to potential washdown by the containment sprays, the drainage of the spray water to the sump pool, and, to a lesser extent, by the drainage of condensate. Debris on surfaces that is hit directly by containment spray is much more likely to transport with the flow of water than debris on a surface that is merely wetted by condensation. Debris entrained in spray water drainage is less easy to characterize. If the drainage flows are substantial and rapid moving, the debris likely would transport with the water. However, at some locations, the drainage flow could slow and be shallow enough for the debris to remain in place. As drainage water drops from one level to another, as it would through the volunteer plant floor drains, the impact of the water on the next lower level could splatter it sufficiently to transport debris beyond the main flow of the drainage, thereby capturing the debris a second time. In addition, the flow of water could erode the debris further, generating more of the very fine easily transportable debris. The drainage of spray water from the location of the spray heads down to the sump pool was evaluated. This evaluation provided insights for the transport analysis, such as identifying areas not impacted by the containment sprays, the water drainage pathways, likely locations for drainage water to pool, and locations where

drainage water plummets from one level to the next.

The retention of debris during washdown must be estimated for the debris deposited on each surface, i.e., the fraction of debris that remains on each surface. These estimates, which are based on experimental data and engineering judgment, were assigned somewhat generically. For surfaces that would be washed by only condensate drainage, nearly all deposited fine and small debris likely would remain there. For surfaces that were hit directly by sprays, a majority of the fine and small debris likely would transport with the flow. Large and intact debris likely would not be washed down to the sump pool because of the screens or gratings across the floor drains and the size of those drains. For surfaces that are not sprayed directly but subsequently drain accumulated spray water, such as floors close to spray areas, the retention fractions are much less clear.

#### **4.3.4 Generalized Debris-Transport Guidance**

##### **4.3.4.1 BWR URG Guidance for Drywell Debris Transport and the NRC Review**

Based on the small-scale testing summarized in Section 4.2.2.1, the BWROG provided guidance regarding options for estimating the fraction of the damaged insulation generated in the drywell that would be transported subsequently to the suppression pool.<sup>4,6</sup> It should be noted that the BWROG approach combined debris generation and drywell debris transport into a combined methodology such that the URG recommends fractions of the damaged insulation within the ZOI that should be considered likely to transport to the suppression pool for each type of insulation. The NRC staff reviewed the BWROG guidance to determine its adequacy.<sup>4,7</sup>

A number of aspects were considered by the BWROG in determining the recommended fractions. First, the debris was categorized into three groups such that the transport of each group could be considered independently of the other groups. Based on the condition of debris recovered in the AJIT tests, the damaged fibrous insulation was categorized as fines, large pieces, and blankets. The damaged RMI debris was categorized as small pieces (<6 in.<sup>2</sup>), large foils (>6 in.<sup>2</sup>), and intact assemblies.

The fibrous "fines" and the RMI "small pieces" generally were considered transportable because they would easily pass through a typical grating. A continuous grating would stop virtually all of the other debris categories.

For fibrous debris, the "large pieces" and "blankets" were effectively treated in the BWROG analyses as a combined group referred to as "blanket material." In both cases, a grating effectively stopped them from transporting, and both were subjected to erosion by break overflow. The insulation within the inner 3 L/D was assumed completely destroyed into transportable debris.

The BWROG used AJIT data to derive the relative fractions of the insulation destroyed into one of three size categories. These fractions depended on the type of insulation and, for some insulation types, on whether the insulation originally was located above or below the lowest elevation grating in the drywell. The BWROG calculated these fractions as integral values averaged over the entire ZOI. These URG fractions are listed in Table 4-16. For example, 77% of the damaged NUKON™ within the ZOI was considered "blanket material" and the remaining 23% was "fines."

The BWROG estimated the transport fractions for each debris category for both fibrous and RMI debris. These fractions are listed in Table 4-17. The BWROG recommended that 100% of the fibrous fines and the RMI small pieces be considered as transported to the suppression pool for Mark I and Mark III plants as a combined result of both blowdown and washdown processes and for both MSL and RL breaks. However, for Mark II plants, the

BWROG limited the transport of fibrous fine debris to 50% for MSL breaks and 56% for RL breaks and RMI small debris to 10% for MSL breaks and 5%C for RL breaks. These estimates were based on small-scale experimental data and the analysis of the water flow on drywell floors.

For larger debris, either fibrous or RMI, no direct transport to the suppression pool was assumed for debris generated above the lowest grating. For larger pieces of fibrous debris generated below the lowest grating, a fraction of this debris was assumed to transport directly to the suppression pool. For Mark I and Mark III plants, this fraction was estimated at 70%, but for Mark II plants, the estimate was reduced to 30%. Larger pieces of RMI (generated either above or below a grating) were not assumed to transport to the suppression pool. The remaining mode of transport applicable to fibrous debris was erosion by break overflow. Here, an assumed 25% of blanket material remaining in the drywell would be located so that it would be plummeted by the break overflow and 25% of this material would be eroded away and transported to the suppression pool, resulting in 6.25% of blanket-material transporting to the suppression pool. Lacking appropriate data, an erosion fraction of 1.0 was assumed for calcium-silicate, Koolphen-K, and Min-K insulations (nonfibrous). The URG did not address breaks that could result in debris being generated both above and below the lowest grating. Further, the URG did not specifically address offset or split gratings where depressurization flows could partially bypass the gratings.

**Table 4-16 Fractions of Blanket Material with Low Transport Efficiency**

Insulation Material	Fraction of Blanket Material with Low Transport Efficiency
NUKON™	0.77
Temp Mat™	0.84
K-Wool	0.78
Knauf®	0.70
NUKON™ Jacketed with Sure-Hold Bands	0.85
Calcium-Silicate with Aluminum Jacketing	0
Koolphen-K®	0.74

Fibrous Insulation Debris		RMI Debris	
Size Category	Transport Fraction	Size Category	Transport Fraction
Fines	1.0 for Mark I and III 0.5 for Mark II MSLB 0.56 for Mark II RLB	Small Pieces	1.0 for Mark I and III 0.1 for Mark II MSLB 0.05 for Mark II RLB
Blanket Material Above Grating	No Direct Transport 25% Erosion of 25% of Pieces = 6.25%	Large Foils Above Grating	No Transport No Erosion
Blanket Material Below Grating	70% Direct + 6.25% Erosion of Remaining 30% for Mark I and III  30% Direct + 6.25% Erosion of Remaining 70% for Mark II	Large Foils Below Grating	No Transport No Erosion

These debris-generation and debris-transport fractions were developed further into combined debris-generation and transport fraction for each type of insulation. Unjacketed NUKON™ debris generated above the lowest grating, for example, 23% of the damaged insulation, was turned into fine debris that subsequently transports directly to the suppression pool. Then, 6.25% of the remaining 77% (blanket material) was eroded away and also transported for a total of 28% of the ZOI insulation transported into the suppression pool (i.e.,  $0.23 + 0.0625 \times 0.77 = 0.28$ ). Below the lowest grating, the total debris transported would consist of the 23% fines, 70% of the 77% blanket material, and 6.25% of the nontransport blanket-material that subsequently was eroded (i.e.,  $0.23 + 0.70 \times 0.77 + 0.0625 \times 0.30 \times 0.77 = 0.78$ ). Combined debris-generation and transport fractions for the Mark I and Mark III plants are listed in Table 4-18.

The BWROG did not develop transport factors for materials other than insulation materials. Where an approved transport factor is not available, licensees should either assume a factor of 1.0 or perform the testing/analysis necessary to justify another factor.

#### NRC Evaluation

The URG recommendations were based primarily on data from small-scale debris-generation and transport tests conducted by the BWROG. Because the staff had several concerns related to scaling small-scale transport test data to BWR conditions, the staff conducted

confirmatory research to verify the accuracy of guidance provided by the URG. Specific concerns included whether or not the flow rates and flow durations in the small-scale tests were prototypical of conditions that would exist in BWR drywells following a LOCA. The staff's analysis indicated the BWROG test flow velocities were on the order of 50% of prototypical velocities for a postulated large MSL break. It was not clear to the staff in evaluating the BWROG test program whether the test results were reasonable, conservative, or nonconservative if scaled to a full-sized plant. Therefore, the staff concluded that there is inadequate substantiation for the BWROG claim that the use of these test results would conservatively bound the drywell transport fraction. The NRC-sponsored DDTs (see Section 2.2.3)<sup>4-3</sup> demonstrated that a high percentage of fine debris could transport to the suppression pool and that the transport of the debris is both plant-specific and break-specific.

Estimating the erosion of large fibrous debris depends on estimating the quantity of debris subjected to erosion, the rate of erosion, and the duration of the erosion. The URG estimate of 25% of the debris being subjected to erosion was based on engineering judgment and was considered by the BWROG to be sufficient to ensure a conservative estimate of the mass of eroded debris. The staff evaluation of the URG guidance for assuming erosion of large fibrous debris concluded that the guidance is adequate provided that the unthrottled ECCS flow does not continue for more than 3 h. The staff concluded that licensees should determine an

<b>Material</b>	<b>Above Grating</b>	<b>Below Grating</b>
Darchem DARMET®	0.50	0.50
Transco RMI	0.50	0.50
Jacket NUKON™ with Modified Sure-Hold Bands, Camloc® Strikers, and Latches	0.15	0.15
Diamond Power MIRROR® with Modified Sure-Hold Bands, Camloc® Strikers, and Latches	0.50	0.50
Calcium-Silicate with Aluminum Jacketing	0.10	0.10
K-Wool	0.27	0.78
Temp-Mat™ with Stainless-Steel Wire Retainer	0.21	0.76
Knauf®	0.34	0.80
Jacketed NUKON™ with Standard Bands	0.28	0.78
Unjacketed NUKON™	0.28	0.78
Koolphen-K®	0.45	0.45
Diamond Power MIRROR® with Standard Bands	0.50	0.50
Min-K	1.0	1.0

\*Same fractions used for steam and water breaks.

appropriate fraction for their analysis if unthrottled flow continues for more than 3 h. Note that NRC-sponsored research demonstrated that erosion of NUKON™ occurs at a linear rate (see Section 2.1.1.5), which facilitates scaling NUKON™ erosion. Based on the overall level of conservatism in the URG guidance, the staff concluded that the URG guidance regarding the prediction of the erosion of large fibrous debris by break overflow was acceptable.

The staff reviewed the URG destruction fractions, i.e., the determination of the fractions of the destroyed insulation that would remain in "blanket material" form with low transport efficiency. On the basis of NRC-sponsored research, the staff noted a number of strengths and conservatisms associated with the URG guidance. The blanket arrangement used in the BWROG tests was conservative, (e.g., the orientation of blanket seams and jacket latches relative to the air-jet nozzle). The BWROG tests oriented seams and latches to maximize blanket destruction. In BWR drywells, insulation blankets could be protected by other structures located in the jet pathway, and this protection was not taken into account in the tests. In the BWROG air-jet tests, the insulation blankets were oriented normal to the air jet to maximize destruction, but in BWR drywells, the majority of the piping (>65%) and therefore the insulation

blankets would be located parallel to the jet flow. Thus, much less of the blanket would be subjected to the full jet flow. The weakness of the BWROG test data was that they were very limited for several types of insulation, specifically Temp-Mat, K-wool, and some of the RMI. However, the staff concluded that the URG methods for determining the ZOI and debris generation are sufficiently conservative to outweigh this weakness.

The primary criticism of the URG drywell debris-transport guidance was the substantially reduced transport fractions applied to the Mark II containments relative to the Mark I and III containments. The NRC-sponsored tests of the Mark II geometry did not identify any basis to conclude that the transport fraction for a Mark II containment would be different from that of a Mark I or a Mark III containment. Given the uncertainty associated with estimating the debris transport fraction, which includes the uncertainty associated with estimating size distribution and quantities of insulation damaged, the staff concluded that the BWROG transport fractions for fibrous debris in Mark II containments are both nonconservative and unacceptable and that Mark II containments should use the same transport fractions as the Mark I and Mark III containments.

#### 4.3.4.2 Transport Fractions for Parametric Evaluation

The NRC sponsored a parametric evaluation to demonstrate whether sump failure is a plausible concern for operating PWR plants in the U.S.<sup>4-12, Vol. 1</sup> The results of the parametric evaluation formed a credible technical basis for decision-making regarding the resolution of the PWR sump-screen issue. Among the limitations of the parametric evaluations was the necessity of assuming and applying generic debris-transport fractions to all PWR plants, knowing that transport fractions are highly plant-specific. The development of these generic transport fractions is discussed in detail in Volume 4 of Ref. 4-12.

A number of simplifying assumptions were necessary to keep the parametric evaluation tractable for each of the 69 operating PWR plants. In addition, the assumptions generally were slanted in favor of sump failure not being a plausible concern. For the purposes of the parametric evaluation, the containment airborne and washdown-transport fractions were combined with the sump-pool transport fraction. That is, the transport fraction used in the parametric evaluation was the fraction of the insulation originally contained within the ZOI that subsequently was transported to the sump screen.

To further simplify the evaluation, one set of transport fractions was applied to all types of insulation debris in the analysis. The insulations types for all the PWRs were categorized for the purposes of this evaluation as either fibrous, reflective metallic, particulate (e.g., calcium-silicate), or foam. The foam insulation was neglected from further analysis on the basis that it would float above the screens and therefore not contribute to head loss.<sup>4</sup> The generic parametric evaluation transport fractions were used to estimate the transport of fibrous insulation, reflective metallic insulation, and particulate insulation alike.

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<sup>4</sup>Note that this assumption was suitable for the purposes of the parametric evaluation but *not* necessarily for plant-specific analyses in that some foam types might not be sufficiently buoyant to float over a sump screen and even buoyant debris would impact, at least to some extent, a sump screen that is not completely submerged.

With respect to sump-screen head loss, the parametric evaluation quickly determined that the head loss associated with fibrous insulation debris would be substantially greater than the head loss associated with the RMI debris. Hence, the study focused on fibrous insulation debris head loss for any plant reporting significant fibrous insulation in the containment. For plants claiming that all or nearly all of their insulation was RMI, the parametric evaluation examined the RMI head loss to determine the likelihood of that plant's sump screen becoming clogged by RMI debris alone.<sup>5</sup>

The head loss associated with calcium-silicate was not evaluated specifically because of the general lack of head loss data for calcium-silicate. The parametric evaluation simply determined the likely quantities of calcium-silicate to transport to the sump screens and added those quantities to the assumed quantity of general particulate transport down from the containment, an approach that definitely is not suitable for plant-specific analyses. Because the presence of calcium-silicate in a fibrous debris bed has been found to substantially enhance the head loss associated with that bed over and above the corresponding head loss without the calcium-silicate present, this approach represents an underestimate (possibly a huge underestimate) of the head loss associated with calcium-silicate. The problems associated with not evaluating the blockage potential associated with calcium-silicate insulation were noted in the evaluation.

It was assumed that 33% of the ZOI insulation was damaged into a form that has been loosely

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<sup>5</sup> It should be noted that in all likelihood no PWR containment would be completely free from fibrous debris. As discussed in Section 2, any containment should be expected to contain a certain amount of miscellaneous dust, which would partially consist of fibers. This type of fibrous debris is referred to as 'latent fibers' and little, if any, data exists at this time to quantify the amount of latent fiber within containment. Latent fibers would be easily washed by the containment sprays to the sump where the fibers would tend to accumulate on the sump screen forming a thin, uniform bed of fibrous debris. In addition, a plant relying primarily on RMI insulation would most likely use other types of insulation in locations where the use of RMI was not practical, and such a plant likely would have other non-insulation materials within the containment that contained fibers, such as fire barrier materials.

referred to as "transportable debris."<sup>4-12, Vol. 3</sup> In other words, 67% of the insulation would not likely transport to the sump because the debris pieces would be larger debris or even partially destroyed insulation blankets still attached to their respective piping. However, erosion of the larger pieces as a result of the impact of water flow is known to happen. Therefore, the 33% was enhanced to 40% to account for erosion.<sup>6</sup> In this manner, the evaluation could neglect further consideration of the transport of the larger debris.

The transport fractions used in the parametric evaluation were based on ongoing NRC-sponsored research into debris transport, including small-scale testing, and on engineering judgment. The results and conclusions from this research had not been completely formulated at the time of the evaluation. The engineering judgment relied on debris-transport research from the corresponding resolution of the strainer-blockage issue for the BWR plants, as well as the ongoing PWR-related research.

The transport fractions used in the parametric evaluation are shown in Table 4-19. In the parametric evaluation, selected parameters were treated using a range of values that were denoted as favorable and unfavorable with respect to the potential for sump blockage. A favorable position was slanted toward not illustrating a credible concern regarding sump blockage. The favorable/unfavorable difference in the transport fractions was a result of the transport fraction associated with transport within the sump pool.

These transport fractions served their purpose in the parametric evaluation but should not be used in detailed PWR debris-transport analyses in lieu of plant-specific debris-transport fractions. As stated, the purpose of the parametric evaluation was simply to demonstrate a plausible concern using very limited plant-specific information. Thus, plant-specific analyses should use plant-specific data. The plant-specific transport fractions could exceed those of the parametric evaluation.

#### 4.4 Types of Analytical Approaches

Analytical work has clearly demonstrated that system-level codes (for example, the MELCOR

<sup>6</sup> An assumption that 10% of the large debris was eroded into fines debris ( $0.1 \times 0.67 = 0.07$ ).

code) do not have the capability to realistically simulate debris transport except for limited transport conditions. The same can be said of CFD codes. The aerosol-transport models in these codes do not usually have inertial impaction models. Inertial impaction models exist for specific circumstances, such as at a bend in a pipe, but these models are not generally applicable to the variety of specific flow situations within containments, even if these situations could be modeled thermal-hydraulically. An exception would be the transport of small debris at relatively slow flow velocities, such as the Karlshamn experiments. (See Section 4.3.3.1.) Here the debris deposition was primarily a result of gravitational settling, which was the dominant deposition mechanism in those tests and is modeled in MELCOR. However, these types of codes are very useful for characterizing thermal-hydraulic conditions within the containment. These codes can predict the flow velocities and distributions, rates of condensation, surface film thicknesses, temperatures, pressures, etc., reasonably well.

One method of reducing the debris-transport fractions is to evaluate specific locations where debris is likely to be trapped and not subsequently washed down to the sump pool. For example, debris carried by flow exiting the break region compartment by way of a door that makes one or more 90° bends may likely become trapped where containment sprays would not impact the trapped debris. Debris-transport testing clearly demonstrated inertial debris capture whenever the flow makes a sharp change of direction and the associated surfaces are wetted. Most surfaces within the containment would be wetted quickly by steam condensation. These experimentally justified specific debris-capture locations could conceivably add up to a significant reduction in the debris-transport fraction.

The logic chart approach developed in the DDTs analyses, discussed in Section 4.3.3.2, might be used to decompose the problem, such that individual parts of the overall transport problem can be resolved by adapting experimental data tempered with engineering judgment. This approach works best where there are relatively few flow pathways and substantial inertial capture along those pathways because of sharp bends in the flow or structures such as gratings. For simpler containments, the approach might be applied to the entire

Transport Conditions	Favorable Estimate	Unfavorable Estimate
Small LOCA (SLOCA) with Sprays Inactive	0.05	0.10
SLOCA with Sprays Active	0.10	0.25
All Medium LOCAs (MLOCAs) and Large LOCAs (LLOCAs)	0.10	0.25

containment, but the approach likely would be difficult to apply for more complex flow situations. The approach should usually still be applicable to the region of the break, even if the flows in the overall containment are too complex for a logic-chart type of analysis.

It might be appropriate to assume a relatively uniform dispersion for the fine and small debris outside the break region for some analyses. After the inertially impacted deposition is estimated, the remaining airborne debris is distributed according to free volume. Outside of the break region, the depressurization flows should slow dramatically as the flows expand. As the flows expand and slow, inertial impaction deposition would become much less important, and as the flow turbulence subsides, gravitational settling would dominate debris capture. Without inertial impaction, the debris would tend to follow the movement of steam and air until settling becomes effective.

The larger debris cannot be dispersed uniformly. Rather, the larger debris would simply fall out after the transport velocities slowed, such as when the depressurization flows entered the containment dome. Large debris ejected into the containment dome would most likely simply fall to the floor of the uppermost levels.

#### 4.5 Rules of Thumb

It is difficult to formulate general rules of thumb appropriate to airborne and washdown debris transport in a PWR containment. Airborne and washdown debris transport are both plant-specific and accident-specific. However, the following general and somewhat simplistic observations apply to airborne and washdown debris transport.

- Fine and small debris transport more readily than does the larger debris.

- Substantial inertial deposition can be expected in the region of the break.
- Outside the region of the break, gravitational settling would dominate debris deposition after the flow turbulence decreased significantly to allow settling.
- If the containment spray system were activated, then substantial quantities (if not most) of fine and small debris impacted by the sprays likely would be washed down to the sump pool.

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## 5.0 SUMP POOL DEBRIS TRANSPORT

Section 5 summarizes the available knowledge regarding transport of insulation debris within the containment sump pool that would form from the accumulation of water during the injection phase of a LOCA. Debris would accumulate in the sump pool with some deposited in the sump region during the blowdown debris-transport period and other transported into the pool along with the water. The airborne/washdown transport of the debris to the sump pool, including where and when the debris would enter the pool, was discussed in Section 4. The phenomena associated with the transport of debris within the sump pool are discussed in this section. The knowledge base associated with insulation and other debris transport<sup>1</sup> within the sump pool is organized as follows.

- Section 5.1 presents an overview of the mechanics associated with debris transport within the sump pool, including the characteristics of an accident relevant to debris transport, the relevant plant features, the physical processes and phenomena, and the debris characteristics affecting debris transport.
- Section 5.2 describes the tests performed that are relevant to sump-pool debris transport.
- Section 5.3 describes the analyses performed that are relevant to sump-pool debris transport.
- Section 5.4 summarizes the types of analytical approaches developed to predict the transport of insulation debris within a sump pool.
- Section 5.5 discusses the guidance based on insights gained from testing and analytical studies.

A majority of the testing and analysis relevant to sump pool insulation debris transport was done to support the suction-strainer clogging issue for BWRs; however, most of this research is directly applicable to PWRs as well. The applicability of BWR research to PWRs is discussed as appropriate. Further, it also should be noted that debris-transport research tended to focus on the transport characteristics of fibrous insulation debris. Research also has considered other types of

<sup>1</sup>The same physical processes and phenomena that govern the transport of insulation debris also would govern the transport of non-insulation debris. However, most experimental transport research has focused on the transport of insulation debris; exceptions include limited transport data for paint chips, rust flakes, and iron oxide particulate.

insulation debris, notably RMI debris, but the potential for fibrous insulation debris to clog a strainer generally has been found to be substantially greater for fibrous debris than for RMI debris. Further research has tended to focus on LDFG insulation over the other types of fibrous insulation, i.e., HDFG or mineral wool fibrous debris. Thus, there are gaps in the completeness of debris transport research for all types of insulation debris.

### 5.1 Overview of Mechanics

The transport of debris within a PWR containment sump pool would be influenced by a variety of physical processes and phenomena and by the features of a particular containment design. These debris transport processes range from debris deposited on the sump floor during blowdown that would subsequently be swept by the spread of water as the sump begins to fill, to debris that later transports into an established sump pool from the upper reaches of the containment by the deluge of containment spray water drainage.

The NRC convened a panel of recognized experts with broad-based knowledge and experience to apply the PIRT process to the transport of debris generated by a high-energy pipe break through a PWR containment.<sup>5-1</sup> The PIRT process was designed to identify processes and phenomena that would dominate the debris-transport behavior. Further, these processes and phenomena were prioritized with respect to their contributions to the reactor phenomenological response to the accident scenario. The NRC also convened a PIRT panel to rank transport processes relative to debris transport within a BWR drywell.<sup>5-2</sup>

This section specifically discusses

- the characteristics of postulated accident scenarios relevant to the transport of insulation debris within a sump pool (Section 5.1.1),
- the plant features that would affect the transport of insulation debris within a sump pool (Section 5.1.2),
- the physical processes and phenomena that affect the transport of insulation debris within a sump pool (Section 5.1.3), and

- the characteristics of debris that affect the transport of insulation debris within a sump pool (Section 5.1.4).

### 5.1.1 Accident Characterization

Many aspects of a PWR accident scenario are important in judging the transportability of debris in the water pool formed on the containment floor. Accident aspects recognized as being important are discussed below. These include the characteristics of the debris deposition within the pool (location and timing), the break (location, orientation, and flow rate), the containment sprays (drainage locations and flow rate), the recirculation sump (location, flow rate, and the activation time), and the sump pool (geometric shape, depth, and temperature).

The transport of debris varies with the postulated accident scenario, which would specify such parameters as the LOCA break size and location. Thermal-hydraulics codes can be used to estimate containment, RCS, and CSS conditions such as pressures, temperatures, and flow rates. For example, the predicted containment pressure would determine whether containment sprays would activate automatically on a high-pressure alarm. The operating procedures should determine whether and when containment sprays might be deactivated by operator action.

Fundamental to analyzing the potential for debris transport in a containment pool are the types, sizes, and quantities of debris that could be in the pool and where and when the debris entered the pool. The transport of debris within the sump pool would occur in two very different phases. The first pool transport phase would occur as the sump pool forms where debris that was deposited onto the sump floor during and shortly after RCS depressurization before sump-pool formation (and also before ECCS switchover to the recirculation mode) would be transported with the fill-up water flows.

During the fill-up phase, debris on the floor would transport as the initially shallow and fast-flowing water spread out across the sump floor. This behavior was observed in the integrated tank tests.<sup>5-3</sup> In this mode of transport, debris could be transported a substantial distance from its initial deposition location; the transport could move debris either toward or away from the recirculation sump. Debris could easily be pushed into inner compartments or out of the main flow locations where it likely would remain. These effects would

be lessened with the distance from the inlet and as the sump water level rose.

The second pool transport phase generally covers the period after the ECCS has switched over to recirculation at or near quasi-steady-state pool flow conditions. Debris transport in the steady-state phase would move debris from where the debris was located in the pool following the fill-up. In addition, more debris would enter the pool because of containment spray drainage. This debris could simply drop into an already established pool, where it could sink to the pool floor or float with the water flow.

The complex movement of water through the sump pool would be unique for each postulated accident sequence and for each plant. The geometry of the sump pool affects the complexity of water movement and that geometry is plant-specific. Water would flow from its point of entry to the entrance of the recirculation sump. Water flowing to the sump would come from the pipe break and from the drainage of the containment sprays (if activated). Water from the break would plummet from the break location; therefore, the break location, the orientation of the break, and the rate of flow from the break could affect flow patterns in the pool. Further, the elevation of the break and the congestion of piping and equipment below the break could affect the momentum and structure of the flow entering the pool, which in turn determines pool turbulence near the break. Pool turbulence would further disintegrate the debris to some extent; it also affects whether debris can settle.

Water from containment spray drainage would enter the sump pool at multiple locations, and the drainage pattern would be very plant-specific. Typical water drains into the sump pool include refueling pool drains, floor drains, stairwells, elevator shafts, an annular circumferential gap, and/or openings to the upper containment, such as a steam generator shaft. In some plants, a train of containment sprays may spray directly into the sump pool. The pattern of the spray drainage and the containment spray flow rate would affect the complexity of the flows within the pool and the subsequent transport of debris within the pool.

The locations of the incoming water relative to the location of the recirculation sump would be especially important. The relative locations determine the flow patterns, which in turn determine whether or how many significant quiescent regions would exist in the pool. Debris within quiescent

regions could remain in those regions indefinitely. For example, if incoming water entered the sump pool well away from the recirculation sump inlet, then the water flow could sweep a majority of the pool, thereby enhancing debris transport. Conversely, incoming water could enter near the recirculation inlet so that much of the sump pool was relatively quiescent. Debris would be much more likely to remain suspended in the turbulent regions of the pool than in the more quiescent regions. In addition, it is known that pool turbulence can affect the further disintegration of certain types of debris, e.g., fibrous or calcium silicate insulation debris.

The depth of the pool strongly affects debris transport. Specifically, the deeper the pool, the slower the water flows; a deeper pool would have less turbulence in general. The available water would govern the maximum depth of the pool, but the depth of the pool when the ECCS switches over to the recirculation mode also depends on relative timing (i.e., the depth of the pool at switchover could be substantially less than the maximum pool depth). For example, pool depth would depend on the rate of ice melt in an ice-condenser plant.

The temperature of the water affects water density and viscosity, the rate at which water penetrates dry insulation debris, and, potentially, debris disintegration rates. Density and viscosity affect the water drag on debris and thus the transport of debris within the sump pool to some extent (e.g., the minimum velocity needed to move a piece of debris across the pool floor); however, this effect was not pronounced for the debris types tested. Alternatively, the water density and viscosity do have a significant effect on debris-bed head loss (discussed in Section 7). The pool temperature has a pronounced effect on the rate at which water penetrates the inner spaces of fibrous debris, thereby releasing the trapped air. This, in turn, affects the buoyancy of the debris. When fibrous debris is dropped in colder water, it can float for an extended period of time, whereas when similar debris is dropped in heated water, the debris tends to sink in a reasonably short period of time. Temperature may have an effect on the disintegration rate of certain types of insulation, particularly calcium silicate insulation.

### 5.1.2 Plant Features

A number of features in nuclear power plant containments would significantly affect the transport of insulation debris within a PWR sump pool.

These features include its engineered safety features and associated plant operating procedures. Plant features recognized as important include the geometric features of the sump pool and features that control water flows into and out of the pool.

Geometric features, such as compartmentalization, free-flowing annuli, flow restrictions, and obstacles, all affect the patterns of flow. There would be areas of relatively high flow velocity and areas of relatively slow or quiescent flow velocities. Debris would transport readily in the high-velocity areas but not in the low-velocity areas. Further, the shape of the sump pool can contribute to rotational flows (vortices), where debris can be trapped within the vortex. The flow would accelerate through narrow pathways, such as an entrance into an interior compartment, and then decelerate beyond the entrance as the flow expands, thereby likely creating regions of rotational flow. Debris that did not transport to the sump screen would have been trapped effectively within a quiescent region, such as an inner compartment that does not receive significant flow, or trapped effectively inside a vortex, or stopped behind an obstacle. The existence of a vortex suppressor in the sump pit or inlet screening structure could influence how flow approaches the sump.

Obstacles to debris transport on the floor of the sump pool include the equipment located there and curbs deliberately placed along the floor in front of the sump screen to retard the transport of debris to it. The equipment located in a sump usually is supported on stands that anchor to the floor, frequently on some sort of small, raised, concrete platform. These obstacles could stop tumbling debris from reaching the screen unless the local flow velocities were sufficient to lift the piece of debris over or around the obstacle. The location, extent, and height of a curb would be important. An example of a miscellaneous structure that could affect debris transport is a closed chain-link gate at a walkway between compartments.

Drainage from the containment sprays ultimately moves from the upper containment levels into the sump pool. The drainage pattern would be very plant-specific and likely would involve a number of features, including refueling pool drains, floor drains, stairwells, elevator shafts, an annular circumferential gap, or openings to the upper containment, such as a steam generator shaft. In some plants, a train of containment sprays may spray directly into the sump pool. The pattern of

the spray drainage and the containment spray flow rate would affect the complexity of the flows within the pool and the subsequent transport of debris within the pool.

Plant features that affect the water level also affect debris transport. These features include the volumes of water injected into the RCS and containment during the injection phase of the accident. For an ice condenser plant, the quantity of ice and the features associated with the melting of the ice would affect the depth of the pool. Features that could potentially hold water in the upper reaches of the containment could reduce pool depth; for example, if the refueling pool drains were to become blocked by debris, the water retained in the refueling pool would effectively reduce the sump pool depth.

The location and design of the recirculation sump affects the transport of debris in the sump pool. The approach velocities of the water entering the sump screen depend on the area of the screen and the pumping flow rate. The turbulence near the sump screen affects the formation of the debris bed, and the level of turbulence would be related directly to the proximity of the sump to the break. Should the break be located near the sump screen, turbulence associated with the falling water could remove previously deposited debris from the screen and the turbulence could negate the effectiveness of debris curbs placed in front of the screens. Conversely, a sump distanced from a break or sheltered from a break by compartment walls would not experience much direct agitation from the break stream.

Some sump designs would mean that the entire screen would be submerged during operation of the recirculation pump, whereas other sump screens would remain partially exposed during the entire accident scenario. The submergence of the sump determines the failure criteria for the screen; that is, the failure of a submerged screen would be a result of the debris-bed head loss exceeding the available NPSH margin, but the failure of a non-submerged sump screen would be a result of the debris-bed head loss exceeding the available hydrostatic head (approximately half of the sump pool depth). The volume of the sump pit could affect debris transport during the fill-up transport phase. As the pit fills with water, the fast moving shallow flow of water across the sump floor would move debris toward the sump screen, as the sump pit filled. Therefore, the larger the pit, the greater the potential for debris

transport toward the screen during the initial filling phase.

### 5.1.3 Physical Processes/Phenomena

The analysis of debris transport test results identified many processes and phenomena that could significantly affect the transport of debris within the sump pool. These include hydraulic processes that contribute to the transport of debris and the debris transport and entrapment processes.

#### Hydraulic Processes

Hydraulic processes include the entry of water onto the containment sump floor, the establishment of a pool, the pumping of water from the sump, and the flow through an established pool. The processes include both bulk-flow and localized processes.

Following a LOCA, liquid effluents from the break would drain to the sump, either directly or after flowing off of containment structures, with most of this drainage entering the sump in the vicinity of the break. If the containment spray system activates, the drainage from these sprays also drains to the sump, but its entry would most likely occur at multiple locations. At first, water falling from a significant height onto the sump floor would spread out in a sheeting type of flow characterized as very shallow but fast-moving with a preference toward the sump (lowest elevation). After the spreading water has spread across the containment floor so that the sump pool begins to form, a hydraulic jump would begin to move back toward the source of the water until the source becomes fully engulfed by the pool. Pool formation hydraulics would be very dynamic and transient in nature and could move debris across the floor dramatically.

After the pool has formed, pool flow dynamics become less dynamic and less transient. When the ECCS switches over to the recirculation mode and the recirculation pumps begin to pump from the sump pool, the pool transitions to steady-state flows. Patterns formed in the pool are three-dimensional in nature and likely would have several features in common for any particular sump design. (If the pool is sufficiently shallow, the flow patterns may become more two-dimensional in nature.) Features of the pool would include accelerated flow through narrow passageways followed by decelerated flow, rotational flow (vortices), regions of relatively quiescent flow (sometimes referred to as inactive or dead zones), flow around and over obstacles, vertical mixing flows, and boundary layer flow.

A particular area of the pool would be characterized by bulk flow terms, such as the bulk flow velocity, but within this area, the localized flow may behave somewhat differently. For example, the flow around a particular piece of debris could be substantially different than the bulk flow velocity (either faster or slower). A particular piece of debris could move as a result of the local flow velocity, whereas the bulk flow velocity might not be sufficient for that movement. Hence, it is important to quantify the level of pool turbulence (or agitation) when predicting debris transport. Turbulence would be generated in the pool primarily by the various flows falling into the pool. Testing has effectively demonstrated that turbulence can keep debris suspended in the pool, enhance the transport of debris along the floor of the pool, and even cause additional degradation (or disintegration) of debris. Pool turbulence would vary throughout the pool, and the highest levels of turbulence would generally be underneath the break.

#### Debris Transport Processes

The transport processes that could be important for evaluating sump-pool debris transport can generally be grouped into debris entry processes, debris pool transport processes, debris entrapment processes, and debris transformation processes.

Debris would be carried into the containment sump area by either airborne flows or waterborne flows. During the violent blowdown portion of the accident scenario, RCS depressurization flows would carry debris into the sump area, where some of that debris would fall out of the airflow onto the sump floor, before the establishment of the sump pool. Upon completion of the blowdown, little, if any, additional debris would be borne by airflows to the sump. Following the brief blowdown period, drainage from condensate and containment spray (if activated) would wash debris that had deposited in the upper reaches of the containment (anywhere above the sump) down to the sump level. Thus, the entry of the debris into the sump would be time-dependent—some early blowdown-deposited debris and then somewhat continuous transport because of the containment sprays. Some debris would be subjected only to steady-state pool water flows, and some debris would be subjected to pool formation water flows, as well. The condensate drainage could transport some debris, but it would be much less than the spray drainage transport. Liquid-borne debris would generally enter the sump pool with the water flow.

Pool debris transport would involve several distinct debris-transport processes that all have been observed during debris transport testing discussed in Section 5.2. During the pool formation phase, the sheeting type of flow (discussed above) effectively transports debris previously deposited onto the sump floor with the spreading of the water flow. Depending on the relative location of the recirculation sump to the incoming flow (predominantly the break flow), the sheeting flow debris transport could move debris toward or away from the recirculation sump.

When the pool becomes sufficiently established to suspend debris that suspended debris would simply move along with the water flow. Fine debris, such as individual fibers or light particles (e.g., calcium silicate), would essentially remain suspended at relatively low levels of pool turbulence, throughout the entire accident scenario. Ultimately, most of this fine, suspended debris would be filtered from the pool by the recirculation sump screens.<sup>2</sup> Larger debris could be suspended in the more turbulent regions of the sump pool (e.g., under the break) or before it was completely water saturated. Debris not completely water saturated would contain some air that would give it buoyancy.

Truly buoyant debris, such as some of the forms of insulations, would float on the pool surface unless the pool turbulence was sufficient to pull the debris beneath the surface. Truly buoyant debris typically would float on the surface and move either toward the recirculation sump screen or into a quiescent or rotational region of flow. Buoyant debris over a submerged sump screen generally would orbit in a rotational flow established above the sump or it could accumulate against a sump screen that was not completely submerged.

When insulation debris enters the sump pool, it could be dry or fully or partially saturated with water depending on its exposure to moisture (e.g., fibrous debris). If the debris was not fully saturated (i.e., contains trapped air), then the debris could still be buoyant, whereas it would readily sink when it was fully saturated. The time required for water to saturate a piece of debris depends on the type of insulation and the size of the piece of debris; it also is very dependent on the temperature of the water. The space between the fibers of fibrous debris usually fills with water rapidly when the water is hot

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<sup>2</sup>Some of this debris likely would pass through the sump screens and subsequently return to the sump pool unless it was trapped within the ECCS or RCS.

(sump-pool temperatures) but fills slowly when the water is cold (room temperature).

Nonbuoyant debris, such as saturated fibrous debris, would settle to the floor of the pool, except in regions of high turbulence. If local flow velocities were sufficiently high, sunken debris would transport along the floor with the water flow. This transport involves tumbling and sliding motions. The separate-effects test data provide the flow velocities needed to start debris in motion (referred to as "incipient motion") and the flow velocities needed to cause the debris to transport in bulk motion.<sup>5-4</sup> Note that significant turbulence would cause debris to transport along the floor at lower bulk flow velocities than if there was no turbulence.

Debris moving across the sump pool floor could encounter an obstacle that stops further forward motion. These obstacles include equipment and curbs placed in front of the recirculation sump to trap debris. Typical equipment obstacles are the supports for equipment located at sump level. These supports are frequently large raised concrete pads. Debris trapped against one of these obstacles could be lifted over the obstacle when the flow velocities are sufficiently fast. The separate-effects test data also provide these lift velocities. This lifting action also applies to debris that would arrive at the base of the recirculation sump screen, where that debris could be lifted (or rolled) up onto the screen.

When the debris transport process is complete, debris would transport either to the recirculation sump screens or become trapped along the way. Some debris could become entangled on equipment, where it could remain, independent of flow velocity. For example, this could happen during the initial formation of the pool, where the rapid flow sheeting might force debris underneath a cable or a conduit. As another example, debris could become entangled in a chain-link gate or fence that sometimes is found in a containment. As previously noted, debris could become trapped behind an obstacle when local flow velocities were not sufficient to lift it over or around the obstacle. Some debris would simply move into a location where the local flow was insufficient to transport the debris further, such as in quiescent flow regions associated with rotational flow or a compartment off of the main flow. When flow decelerates and slows with a widening flow cross section, the debris could simply stop at some point. In some cases, trapped debris can become re-entrained into the main flow. For example, pieces of debris once trapped on the

floor inside a vortex have been observed to occasionally be forced by localized flow turbulence back into the faster flow of the vortex and thereby re-entrained into the main flow.

Debris that reaches the sump screen would remain on the screen if the approach velocity of the water were sufficiently fast, as would normally be the case. The separate-effects tests measured this velocity, which is referred to as the screen-retention velocity, for a few types of debris. When the approach velocity was marginal in the integrated tests, pieces of debris were observed to drift away from the screen after arriving at the base of the screen.

Debris has been observed to undergo transformation under some conditions, i.e., the agglomeration of small debris into larger debris or the disintegration (also referred to as erosion) of larger debris into finer debris. In general, agglomeration would make debris less transportable and disintegration would make debris more transportable. A form of agglomeration was observed during the integrated debris-transport tests in which small LDFG debris that accumulated on the floor in quiescent regions, such as the center of a vortex, tended to mat together. This mat then moved as though it was one piece of large debris. Such matting would increase the retention of debris at such locations; however, it likely would break apart easily if the mat subsequently was forced back into more dynamic flow.

Disintegration is the most important form of debris transformation because this process forms very fine debris that remained suspended in the water even at relatively low levels of turbulence, hence transporting to the sump screens virtually completely. For LDFG debris, this disintegration was observed in the integrated tank tests and during the Vattenfall tests,<sup>5-5</sup> which noted that "larger pieces of insulation material would disintegrate into fibers and fines" when subjected to falling recirculating water. Calcium silicate also was observed to disintegrate, more so than the LDFG debris. The rate of debris disintegration would depend mostly on the turbulence to which the debris was subjected. Most of the disintegration likely would occur to debris thrashing around in the turbulence associated with the break flow plummeting into the sump pool. It is possible that higher temperatures and/or chemical decomposition could enhance disintegration. A concern here would be the breakdown during long-term pumping of the binder that holds fibers or particles together,

thereby releasing these fibers and particles from the larger debris. (See Section 2.5.)

#### 5.1.4 Debris Characteristics

Transport of debris in a sump pool is strongly dependent on the characteristics of the debris formed. First, these characteristics include the type and the size of the debris. There are several kinds of insulation material in use in PWR containments. These are generally grouped as fibrous insulation, RMI insulation, and particulate insulation (e.g., calcium silicate). In addition, there are other types of debris, such as failed coatings, dust, and miscellaneous operational materials (Section 2). Pieces of debris would be varied in size; for example, fibrous debris would range from individual fibers to nearly intact pillows. Debris from failed coatings would range from very small particles to substantially large chips. Debris transport depends greatly on the type and size of the debris.

Each type of debris has its own set of physical properties, including properties that determine whether the debris would sink in a sump pool. The debris buoyancy would depend on the density of each piece of debris:

- the density of each constituent of the debris (e.g., the solid density of an individual fiber),
- the density of the insulation as fabricated or as installed, which for fibrous insulation includes the air space between the fibers,
- the density of a piece of insulation debris, which could differ significantly from the as-fabricated density, and
- the density of the debris after it becomes saturated with water.

In addition, the time required for a piece of debris to saturate with water could be important because this would determine how long and how far the debris could float before sinking to the floor. An intact pillow of fibrous insulation could retain sufficient air for the pillow to transport all the way to the recirculation sump screen. The debris settling velocity (the rate at which debris settles vertically in water) could become important if the pool were sufficiently deep.

The flow velocities needed to initiate specific debris transport motions are also debris transport characteristics. These motions include tumbling/sliding motion across the floor, lifting the debris over an obstacle, and retaining the debris on the sump screen when it arrives there. These

velocities have been measured for selected debris types and sizes and for both incipient and bulk motion. The lift velocity also depends on the height of the obstacle.

The characteristics associated with debris disintegration are also important because the by-product of the disintegration usually would be very fine debris that remains suspended and therefore transports readily to the sump screen. These properties are much more difficult to characterize, but chemical stability in the sump pool should be considered. For example, would the binding decompose during long-term submergence in the sump pool and would this decomposition depend on pool acidity? Both fibrous and particulate insulation debris are known to disintegrate to some extent, but data needed to quantify this disintegration is not readily available. For example, calcium silicate insulation debris disintegrates rapidly in water, leaving a fine particulate in suspension. The rate of disintegration is affected by the temperature of the water and agitation. The accumulation of calcium silicate debris along with fibrous debris on a screen is known to create a substantial head loss.

## 5.2 Debris Transport in Pooled Water Testing

The NRC, US industry, and international organizations have conducted numerous tests to examine experimentally different aspects of the transport of insulation and other debris in pooled water. The types of insulation tested have included fibrous insulations (mostly LDFG), RMI, particulate insulations, foam insulations, and a fire-barrier material known as Marinite. The non-insulation debris tested has included inorganic zinc paint particles and flakes, iron oxide rust chips, iron oxide particles, and Koolphen K vapor barrier foil paper. The results of these experiments provide qualitative insights and quantitative information relevant to considerations of debris transport in PWR containment sump pools.

### 5.2.1 Alden Research Laboratory Buoyancy and Transport Testing on Fibrous Insulation Debris

In the early 1980s, sponsored by the NRC, the Alden Research Laboratory (ARL) conducted buoyancy, transport, and head loss experiments on reactor insulations,<sup>5-6</sup> primarily fibrous insulation. Three types of thermal insulation pillows with mineral wool and fiberglass cores were tested in an undamaged state, with their covers opened, and

with their insulation cores in broken-up and shredded conditions. A sample of closed-cell (foam glass) insulation and an intact RMI cassette also were tested for transport and buoyancy. The buoyancy and transport aspects and findings of the experiments are summarized below. (Head loss is addressed in Section 7.)

### **Objective**

The objective of the experiments was to provide data to help assess the potential effect of dislodged fibrous insulation on ECCS sump performance. The experiments were configured to determine the buoyancy, transport, and head loss characteristics of the following types of insulation pillows.

- Type 1: Mineral wool enclosed in a Mylar-coated asbestos cover.
- Type 2: HDFG insulation covered with silicone glass cloth on one side and stainless-steel mesh on the other
- Type 3: HDFG insulation covered with fiberglass cloth

A sample of closed-cell insulation and an intact RMI cassette also were tested for transport and buoyancy.

The experiments related to buoyancy and transport were to determine:

- The buoyancy characteristic of the fibrous insulation (this amounted to timing how long the insulation would float while sprayed with a fine mist of water), and
- The flow velocity at which sunken insulation would move and the manner by which transported insulation would collect on a vertical screen.

### **Methodology**

#### Types of Insulation Pillows Considered

Three types of insulation pillows were tested, and their compositions are listed below. All pillows were 2 ft by 2 ft by 4 in. thick. These pillows were basically made of a 4-in. thickness of insulating material enclosed in a core. The cores were closed with staples and fastened with tie rods going through the insulation.

At the time of the experiments (1983), Type 1 insulation was in use at some operating nuclear plants, but plants under construction were not planning to use this type of insulation. The insulation used in the tests was layered, 4-in. thick, 6-lb mineral wool or refractory mineral fibers (two

2-in. layers in the material tested). The covering was Uniroyal #6555 asbestos cloth coated with a ½-mil Mylar film with stainless-steel staple seams. It should be noted that a small sample of mineral wool obtained from Maine-Yankee was included in the tests and that the mineral wool in the Maine-Yankee sample was manufactured by a different company than the mineral wool in all other samples used in the experiments.

Type 2 insulation was an oil-resistant insulation pillow. The core insulation was four-layer fiberglass Filomat-D – 1 in. (high-density, short-fiber E glass in needled pack). The cover includes an inner stainless-steel knitted mesh and outer silicone glass cloth (Alpha Maritex Product #2619). The blankets were closed with stainless-steel staples.

Type 3 pillows involve the same core insulation as Type 2 but with the cover a different 18-ounce fiberglass cloth (Alpha Maritex Product #7371). The blanket seams were fastened with stainless-steel staples.

### Buoyancy Tests

The objective of these tests was to determine how long insulation pillows in undamaged, opened, and broken-up conditions would float. To approximate the conditions in the containment building following a LOCA, the insulation was sprayed continuously with a fine mist. Also, because preliminary tests indicated that the time needed for the insulation to sink decreased significantly with increased water temperature, the tests were performed with water temperatures between 120°F and 140°F, which is conservatively less than the containment pool temperature that would exist early in a LOCA.

The tests were carried out in a large tank roughly 15 ft x 5 ft x 9 ft tall filled with approximately 5 ft of water and separated vertically into three equal-sized compartments (5 ft by 5 ft in plan). A recirculating system with a 15-hp oil heater (boiler) was used to bring the tank water to the desired temperature and maintain it there. Conventional shower heads adjusted to fine spray and located about 3 ft above the water surface were used to spray the insulation. The top of the tank was covered with a plastic sheet to minimize heat loss, and as a result, the air above the water surface was saturated with water vapor.

In the buoyancy experiments, samples of insulation pillows were gently placed on the water surface and maintained under the spray. The time needed for the samples to sink was measured.

In addition to the fibrous insulation pillows, closed-cell insulation was tested for buoyancy. A small sample was deposited on the surface of water with the water at approximately 120°F, and its behavior was noted. The sample appeared to float indefinitely.

#### Transportation Tests

The objective of these tests was to determine the conditions under which insulation material would be transported by the flow to the sump screen and in what manner it would collect on the screen.

For floating insulation pillows, investigations were directed at corroborating transport to the screen at the water surface velocity and noting the conditions under which the pillows would flip vertically against the screen.

For sunken insulation, the flow velocity needed to initiate transport was measured, and the way the material collected on the screen was noted.

Tests were performed with insulation pillows in the following forms.

- Floating whole pillows
- Sunken whole pillows
- Sunken pillows with covers removed (but placed in the flume) and insulation layers separated
- Differently sized (6-in. square to 12-in. x 24-in.) full-thickness sunken pillow pieces with covers
- Sunken 4-in. x 4-in. x 1-in. and 4-in. x 1-in. x 1-in. pillow fragments without covers
- Sunken pillows in shreds (no cover material)
- Sunken individual shreds

Most of the transportation tests were conducted in a flume 6 ft wide by 6 ft deep and approximately 40 ft long equipped with a recirculation flow system. A screen similar to those used in containment sumps was erected across the flume, and a grating in front of the screen served as a trash rack. A water depth of 2 ft 8 in. was used with the equivalent insulation volume of two 2-ft x 2-ft x 4-in. pillows. The insulation pillows were dropped in the water 25 ft upstream of the screens, where the velocity distribution across the flume was approximately uniform. Flow velocities were measured using a laboratory current meter. Velocities were measured about 6 in. above the sunken insulation.

Turbulence generators were added to the flume for a few tests using 4-in. x 4-in. x 1-in. fragments of insulation pillows and pillow shreds. These turbulence generators were made with piles of cinder blocks extending nearly to the water surface and blocking part of the flow area. These piles of cinder blocks were intended to somewhat represent obstructions that might be present on a containment floor.

Tests with small single fragments of insulation material (4-in. x 4-in. x 1-in. shreds) were performed in a smaller 1-ft-wide flume with a 7-in. water depth. The flow velocity to initiate motion of the individual fragments (one at a time) was measured with a miniature propeller velocity meter.

In addition to the tests described above, the flow velocity needed to initiate the motion of an intact RMI cassette was measured. The sample was deposited on the bottom of the 6-ft flume with a water depth of 2 ft 8 in. Flow velocity was increased gradually until movement was observed.

#### **Key Findings**

The buoyancy tests revealed the following.

- In general, the time needed for both mineral wool and fiberglass insulation to sink is less at higher water temperatures.
- Most mineral wool does not readily absorb water and can remain afloat for several days. A notable exception to this was that the mineral wool received from Maine-Yankee, which sank in several hours in 50°F water and in 10 to 20 min in 120°F water.
- Fiberglass insulation readily absorbs water, particularly hot water, and sinks rapidly (from 20 to 60 min in 50°F water and from 20 to 30 s in 120°F water).
- Undamaged fiberglass pillows of Type 3 (and possibly also of Type 2) can trap air inside their covers and remain afloat for several days.
- Based on the observed sinking rates, it may be concluded that mineral wool pillows and some undamaged fiberglass pillows (those that trap air inside their covers) will remain afloat after activation of the containment recirculation system (approximately 20 min after the beginning of the LOCA). Those floating pillows will be transported readily to the sump screens. Damaged fiberglass insulation pillows will sink before activation of the recirculation system and will move only if the water velocity exceeds the incipient transport velocity associated with the pillows.

- RMI cassettes (at least of the type tested) sink immediately, and closed-cell foam insulation floats indefinitely. (The RMI cassette investigated measured 8 in. x 8 in. x 3 in. and had six sheets of reflective metal. The closed-cell insulation was a 6-in. x 4-in. x 2-in. parallelepiped of foamed glass.)

The transportation tests revealed the following.

- Floating insulation does move at the water surface velocity.
- Water velocities needed to initiate motion of sunken insulation are on the order of 0.2 ft/s for individual shreds, 0.5 to 0.7 ft/s for individual small pieces (up to 4 in. on a side), and 0.9 to 1.5 ft/s for individual large pieces (up to 2 ft on a side).
- Whole sunken fibrous pillows require flow velocities of 1.1 ft/s for Type 1 (mineral wool) and 1.6 to 2.4 ft/s for Types 2 and 3 (fiberglass) to flip vertically onto a screen.
- Floating pillows require a water velocity in excess of 2.3 ft/s to flip vertically against a screen.
- Sunken fragments of insulation pillows tend to congregate near the bottom of a vertical screen if there are no turbulence-generating structures (piles of cinder blocks in the flume experiments) in front of the screen. Depending on the water depth, unblocked space remains near the top of the screen. With a turbulence-generating structure a few feet in front of the screen, some insulation fragments get lifted and collect higher on the screen.
- Insulation shreds tend to remain waterborne and collect over the entire area of a screen.
- After reaching a screen, mineral wool fragments tend to lose their shape and turn into pulp. This contrasts with fiberglass fragments, which retain their shape and integrity.
- Intact RMI cassettes (or at least cassettes like the one tested) require a flow velocity of 2.6 ft/s to start and keep moving.

#### **Limitations**

Several references were made in the test report to the covers of fibrous insulation pillows being in place or removed. However, no mention of any buoyancy or transportability characteristics of the covers themselves could be found.

Different insulations than the specific ones tested in this study could have different characteristics. The

test results presented here are therefore only applicable for the specific insulations described.

No mention could be found as to whether the insulation tested had been pretreated (e.g., heated) or not.

#### **5.2.2 Pennsylvania Power and Light Debris Transport Tests**

In 1994, Pennsylvania Power and Light Company (PP&L) sponsored tests conducted at ARL to investigate issues relating to plugging of suppression pool suction strainers in BWR power plants.<sup>5-7</sup> These tests, which commonly are referred to as the PP&L tests, were conducted in two parts.

- Transport tests—performed to quantify the transport velocities and turbulence levels (vertical mixing) required to keep materials waterborne where they could contribute to strainer plugging.
- Head loss tests—performed to investigate strainer head loss as a result of an accumulation of LDFG insulation debris with and without particulate present.

The transport tests are summarized here. Although these tests were conducted with BWR suppression pools in mind, they also provide meaningful information on the effects of vertical mixing on debris transport in PWR containment pools.

#### **Transport Test Objectives**

The transport tests were conducted to investigate the transport characteristics of various materials found in Susquehanna Steam Electric Station Units 1 and 2. The tests, which were conducted in a flume, were designed to investigate whether the flow patterns that would exist in a suppression pool could keep the materials suspended. The flume was configured to somewhat resemble a suppression pool with flow induced by ECCS recirculation and water returning to the pool via the downcomer vents. The tests provide information as to what types of material could be expected to settle to a suppression pool floor, where they would not be available to contribute to strainer plugging.

The transport of material over a weir also was investigated. Tests were conducted to quantify the flow rates required to draw the different debris types over a weir acting as a barrier to debris transport. These data were useful in assessing whether debris would remain on the drywell floor or be drawn over the drywell downcomer weir by recirculating water

flow spilling out of the broken pipe in a LOCA scenario. The data are applicable to considerations of debris transport over curbs in PWR containments.

The materials tested in the flume included LDFG insulation debris, inorganic zinc paint particles and flakes, iron oxide rust chips, iron oxide particulate, RMI, and Koolphen K vapor barrier foil paper. LDFG fibers and LDFG clumps of the following descriptions were tested.

- LDFG fibers—LDFG insulation debris of a light, loose, well-aerated texture with an average density of approximately  $2.08 \text{ kg/m}^3$  ( $0.13 \text{ lbm/ft}^3$ ) usually consisting of a loose cluster of individual fibers.
- LDFG clumps—LDFG insulation debris torn from a blanket and aerated by a jet blast to an average density of approximately  $20.8 \text{ kg/m}^3$  ( $1.3 \text{ lbm/ft}^3$ ). Clumps retain some of the structure of the original blanket where the binder keeps individual fibers consolidated at a lower density than the original blanket.

#### **Test Apparatus**

The flume had a 22-in.-wide, 16-in.-deep, rectangular cross section and was 18-ft long. It had one glass side to allow debris movement to be observed. Water was introduced at one end of the flume and passed through flow straighteners before it entered the test section. The influence of turbulence from return flow to a suppression pool through downcomers was investigated by discharging jets downward into the flume beneath the water surface. The downward jets were introduced through three 1-in. pipes distributed along the flume length. The jets imparted a known amount of mixing energy to the lateral flow, which was quantified as a power per unit volume ( $W/m^3$ ).

In the tests involving a weir, the 12-in high weir was placed at the outlet end of the flume. Modeling similitude was addressed (i.e., the differences were studied between the linear weir in the flume and the circular weirs of BWR downcomer vents).

#### **Key Findings**

Material transport was observed in the flume, specifically whether debris settled at a given flow velocity and mixing energy. It was found that heavier debris, such as paint flakes, rust chips and RMI, settled readily. On the other hand, sludge was observed to remain largely waterborne. The LDFG fibers remained waterborne with very little flow mixing. The degree of mixing necessary to keep the

LDFG clumps waterborne was sizeable but not greater than the mixing that could be expected in a BWR suppression pool during ECCS recirculation.

For the weir tests, whether debris was carried over the weir depended on the speed of the flow through the flume.

#### **Limitations**

The quantitative information obtained for these tests relating mixing energy to debris transport is applicable in general to portions of a PWR containment sump pool away from the extreme turbulence of the pipe break flow plummeting into the pool.

### **5.2.3 Alden Research Laboratory Suppression Pool Debris Sedimentation Testing**

The NRC sponsored tests, which were conducted by ARL, to investigate debris sedimentation in a BWR suppression pool. Although these tests apply specifically to the resolution of BWR suction strainer clogging issue, the debris settling data could have relevance to debris settling in a PWR sump pool, specifically in the portion of the pool where the debris transitions from the higher turbulent mixing near the pipe break into the calmer portions of the pool. Hence, these tests are summarized here.

After a postulated LOCA, the BWR suppression pool would experience a range of turbulence conditions, specifically, a high level of turbulence immediately following the LOCA, a transition period, and then a longer-term relatively quiescent period after primary system depressurization is completed. During the period of high turbulence, debris transported from the drywell to the suppression pool would undergo mixing and, potentially, fragmentation. In addition, any debris previously located on the suppression pool floor likely would be resuspended. During the quiescent period, debris would gradually settle to the suppression pool floor. These phenomena govern the transport of debris within the suppression pool, thereby determining the type, quantity, and form of debris deposited onto the strainers.

To study these debris behaviors, a test apparatus was designed that would simulate a Mark I suppression pool on a reduced scale. The fibrous debris sedimentation tests are discussed in Section 5.2.3.1, and the RMI debris sedimentation tests are discussed in Section 5.2.3.2.

### 5.2.3.1 Fibrous Debris Sedimentation Testing

#### Test Objective

The overall purpose of the suppression pool tests was to provide insights into debris transport within a suppression pool following a LOCA.<sup>5-8</sup> However, the underlying processes are too complex to be addressed by a single set of experiments. Based on scoping studies and discussions with experts in related fields, the phenomena selected for further study were:

- debris transport and sedimentation within the suppression pool during the high-energy phase that would immediately follow a medium loss of coolant accident (MLOCA) and
- debris transport and sedimentation within the suppression pool during the post-high-energy phase.

The high-energy downcomer oscillations for a LLOCA would be driven initially by condensation oscillations for a relatively short period of time (about 30 s) and then be followed by chugging for the remainder of the blowdown phase. Because the condensation phase would be relatively short and more difficult to simulate experimentally, the tests focused on the chugging phase.

The primary focus was to obtain debris-settling-velocity data to support analytical evaluations, specifically analyses applicable to the potential for strainer blockage in the BWR reference plant analysis.<sup>5-9</sup> Because the insulation used to insulate primary system piping in the reference plant consisted predominantly of LDFG mats, the debris beds formed on the reference plant strainers were expected to consist primarily of accumulated fragments of LDFG insulation with particulate debris embedded within its fibers. Therefore, LDFG debris and particulate debris with the characteristics of suppression pool sludge were used in these tests.

#### Test Apparatus and Instrumentation

A water tank designed to simulate a segment of a Mark I BWR suppression pool was constructed of steel with the appropriate lower curvature. The tank sidewalls of the segment were made of Plexiglas to provide complete visibility of the debris in motion. Turbulent chugging associated with steam-water oscillations (condensation oscillations) during depressurization of the primary system was simulated in these tests by including four 10-in. (0.25-m) diameter downcomers fitted with pistons. One of the downcomers was constructed of

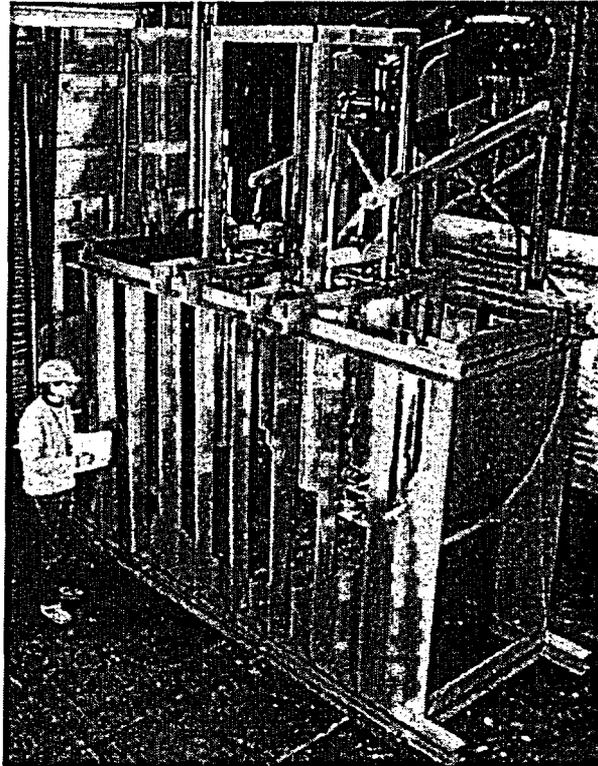
Plexiglas to facilitate visualization of debris transport. The test apparatus is shown in Figure 5-1.

The geometric scale of the tank was 1 to 2.4, and the radius of the test tank was 13.5 ft (4.11 m). The spacing between the downcomers and their clearance with respect to the floor were also scaled. The front and back walls were spaced one-half the distance to the next pair of downcomers in either direction. Hence, the water volume of the tank per downcomer was scaled to the volume per downcomer of a typical BWR Mark I suppression pool.

The pool dynamic conditions associated with the high-energy phase of a MLOCA are usually referred to as "chugging." Chugging occurs when water reenters the downcomers as a result of decreasing steam flow, thereby condensing steam. The build up of noncondensable gases would subsequently push the water from the downcomers until sufficient noncondensable gasses escapes the downcomers to initiate another cycle. Energy input to the suppression pool during chugging was based on data obtained by General Electric (GE) in a full-scale test of a Mark I containment at their full-scale test facility (FSTF).<sup>5-10</sup> Two types of chugging behavior were observed in test data for a MLOCA.

- Type 1, where the neighboring downcomers oscillated in phase, i.e., oscillations were synchronized.
- Type 2, where the oscillations were relatively unsynchronized.

Because Type 1 chugging was deemed more prototypical of MLOCA, only Type 1 chugging was studied in these tests. All downcomer pistons oscillated in phase to simulate Type 1 chugging. For several Type 1 chugs, the FSTF tests provided pressure measurements within a downcomer. Because GE did not measure the actual kinetic energy imparted to the suppression pool during each chug directly, an analytical model was devised to deduce the energy from the measured chugging pressures. This model was then used to estimate both the chugging period of the downcomer oscillation and its amplitude of two-phase level movement. Because the dynamics of chugging changed continuously during primary system depressurization, the period and amplitude were estimated for the initial, middle, and later stages of chugging. Further, these estimates were modified to reflect scaling considerations.



**Figure 5-1 Suppression Pool Sedimentation Test Apparatus**

The test facility included a series of sampling ports to allow concentrations of sampling debris at five equally spaced vertical locations at the center of the tank. The samples were filtered, dried, and weighed so that the concentrations could be expressed as the mass of debris per unit mass of water. A debris classification system was devised that classified pieces of debris into seven groups.

#### **Test Data**

Fourteen parametric tests were conducted to examine a variety of test conditions. The test parameters included

- the type, form, and quantity of insulation debris tested;
- the quantity of sludge tested; and
- the period and amplitude of the downcomer piston chugging.

Within the ranges of tested parameters, the data exhibited the following trends.

- Both the fibrous and particulate debris remained fully mixed in the tank during simulated chugging at all energies tested,

resulting in uniform vertical concentration profiles.

- Turbulence-resuspended debris initially deposited onto the suppression pool floor during simulated chugging at all energies tested.
- Fibrous debris underwent further fragmentation into smaller sizes, including individual fibers, at all energies tested. In general, the fragmentation occurred near the downcomers where the fibrous debris was subjected to cyclic shear forces from the downward jet and ingestion into the downcomer.
- Visual observations suggested that turbulence decays within a few minutes after termination of chugging simulation, thus enabling post-high-energy-phase debris settling. In the post-high-energy phase, the vertical concentration profiles were slightly nonuniform. The ranges of settling velocities in calm pools (terminal velocity) are listed in Figure 5-2 for each debris size classification. The terminal settling velocity for fibrous debris is shown in Figure 5-3 as a function of debris weight.

Class No.	Description	Settling Characteristics	Settling Velocity in Calm Pools	Strainer Filtration Efficiency
1	 Very small pieces of fiberglass material, "microscopic" fines which appear to be cylinders of varying L/D.	Drag equations for cylinders are well known, should be able to calculate fall velocity of a tumbling cylinder in still water.	1-3.5 mm/s Based on Cal. for 0.5 - 2.54 cm long fibers	Unknown
2	 Single flexible strand of fiberglass, essentially acts as a suspended strand.	Difficult to calculate drag forces due to changing orientation of flexible strand.	Same as above	Nearly 1.0
3	 Multiple attached or interwoven strands that exhibit considerable flexibility and which due to random orientations induced by turbulence drag could result in low fall velocities.	This category is suggested since this class of fibrous debris would likely be most susceptible to re-entrainment in the recirculation phase if turbulence and/or wave velocity interaction becomes significant.	0.04 ft/s - 0.06 ft/s (measured)	1.0 (measured)
4	 Formation of fibers into clusters which have more rigidity and which react to drag forces more as a semi-rigid body.	This category might be represented by the smallest debris size characterized by PCI's air blast experiments.	0.08 - 0.13 ft/s (measured)	1.0 (measured)
5	 Clumps of fibrous debris which have been noted to sink. Generated by different methods by various experimenters.	This category was characterized by the PCI air test experiments as comprising the largest two sizes in a three size distribution.	0.13 - 0.18 ft/s (measured)	1.0 (measured)
6	 Larger clumps of fibers. Forms an intermediate between Classes 5 and 7.	Few of the pieces generated in PCI air blast tests consisted of these debris types.	0.16 - 0.19 ft/s (measured)	1.0 (measured)
7	 Precut pieces (i.e. .25" by .25") to simulate small debris. Other manual/mechanical methods to produce test debris.	Dry form geometry known, will ingest water, should be able to scope fall velocities in still water assuming various geometries.	0.25 ft/s (calculated)	1.0 (estimated)

Figure 5-2 Fibrous Debris Classifications

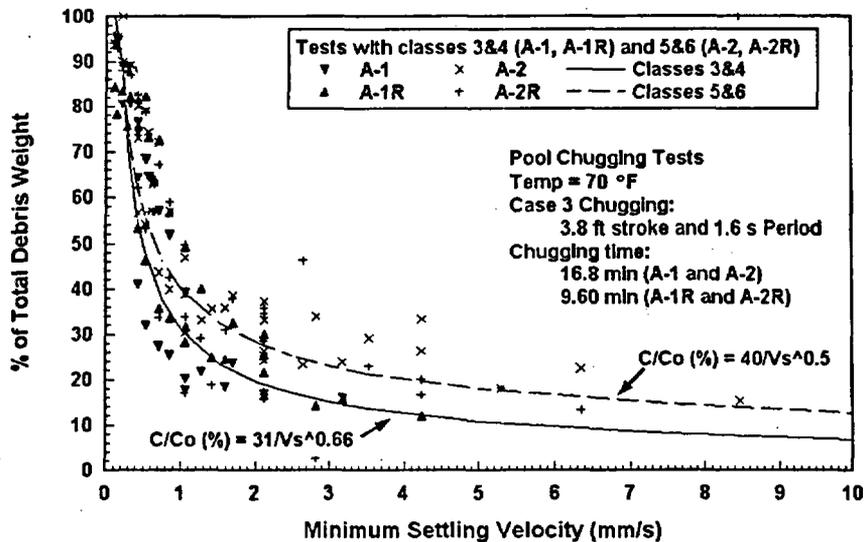


Figure 5-3 Fibrous Debris Terminal Settling Velocities

- Measured concentrations showed that fibrous debris settled slower than the sludge and that the settling behavior of each material is independent of the presence of the other material.

These results were deemed equally valid for other phases of accident progression and other sizes of LOCAs. These tests showed that the assumption of considering uniform debris concentration during strainer calculations is reasonable. However, it must be noted that the continuous operation of the recirculation ECC and the RHR systems in an actual BWR would add additional turbulence to the pool and that this type of turbulence was not considered in these tests. Therefore, applying these data to an actual plant analysis requires engineering judgment.

### 5.2.3.2 Reflective Metal Insulation Debris Sedimentation Testing

The potential for RMI debris transport within a suppression pool to an ECCS pump suction strainer was experimentally demonstrated. RMI debris that was transported from a BWR drywell into a suppression pool would undergo mixing during the period of high turbulence. Debris would settle to the suppression pool floor during the quiescent period. These phenomena govern the transport of debris within the suppression pool, thereby determining the quantity of RMI debris deposited onto the strainers.

#### Test Objective

The RMI test objective was similar to that of the fibrous debris sedimentation tests.<sup>5-11</sup> The overall purpose of the RMI suppression pool tests was to provide insights into RMI debris transport within a suppression pool following a LOCA. RMI debris transport and sedimentation within the suppression pool were studied both during the high-energy phase that would immediately follow a MLOCA and during the post-high-energy phase. A primary focus was to obtain debris-settling-velocity data to support analytical evaluations.

#### Test Apparatus and Instrumentation

The test apparatus used in the RMI debris testing was the same as the apparatus used in the fibrous debris testing described above. The RMI debris used in these tests was debris generated by the SIEMENS large-pipe-break debris-generation test.<sup>5-11</sup>

#### Test Data

Still-water debris-settling tests were performed on individual pieces of RMI debris with representatives from each of six size groupings. Each piece was placed individually in the suppression pool test tank, and its time to settle a known distance was measured. For all sizes less than 6 in., the mean settling velocity was about 0.12 m/s (0.4 ft/s). The large 6-in. pieces settled about 20% slower than the smaller pieces.

Chugging energy and RMI debris size were varied to determine their effect on RMI debris suspension. Figure 5-4 is a photo of 6-in. pieces of debris in suspension during chugging. Approximate settling times after the simulated chugging ended were recorded for various sizes of RMI shreds.

Approximately 2/3 of the RMI pieces remained suspended at the higher energy levels, whereas ~1/2 of the pieces remained suspended during the lower energy chugging phase. The effect of residual turbulence on settling times was significant for the small RMI debris. After chugging, the turbulence decayed away, allowing settling to occur. In the turbulent pool after chugging stopped, the larger RMI debris (2- to 6-in. category) settled up to two times faster than the smaller RMI debris (0.25- to 0.5-in. category). All RMI debris settled within 2 min after chugging ceased. The settling time after simulated chugging ended was independent of chugging energy. The concentration or density of debris pieces did not affect settling rates within the range of concentrations tested. However, for concentrations larger than about 2 g/ft<sup>3</sup>, inter-action between RMI shreds on the floor of the tank somewhat inhibited re-entrainment during simulated chugging. Note that because suppression-pool ECCS flow recirculation was not simulated in these tests, these results do not consider the effects of recirculation on material settling or possible resuspension.

### 5.2.4 Alden Research Laboratory Reflective Metallic Insulation Materials Transport Testing

The ARL RMI testing was sponsored by the NRC to support the resolution of Unresolved Safety Issue A-43, "Containment Emergency Sump Performance." ARL investigated the transport characteristics of RMI assemblies and parts thereof in flowing water.<sup>5-12</sup> The investigation is summarized in the following paragraphs.



**Figure 5-4 Typical Large (6-in.) RMI Debris in Suspension During Chugging**

**Objective**

The study was aimed at determining

- the flow velocities needed to initiate the motion of sunken pieces of RMI, either entire jackets or components thereof and either basically undamaged or crumpled;
- the effects of interaction between multiple pieces of RMI or between RMI pieces and flow boundaries; and
- the screen blockage modes, i.e., the ways in which pieces of RMI would collect on and block a vertical PWR sump screen.

**Methodology**

The pieces of RMI tested were either components of a 36-in. long insulation assembly for a 10-in. pipe furnished by the Diamond Power Specialty Company or sheets of stainless-steel foil of different thicknesses. The tests were conducted in a 6-ft wide, 6-ft deep, and 40-ft long flume. Water was introduced at one end of the flume behind a flow-straightening plate and was maintained at a depth of 32 in. At the downstream end of the flume, a screen and trash rack similar to those used around recirculating sumps were erected vertically across the full width. The screen was made of 1/16-in. wire with a ¼-in. mesh directly behind a standard 1-in. floor grating with its more closely spaced bars oriented horizontally.

The samples of RMI were placed in the flume approximately 20 ft upstream of the trash rack and screen. Flow velocity then was gradually increased, and the velocity at which a sample started to move was recorded. If a sample stopped, and judgment was made that it would not move further, flow velocity was increased until further movement was observed. The minimum flow velocity that caused movement all the way to the screen was recorded as the transport velocity for a sample.

**Key Findings**

Transport Velocities

- As-fabricated RMI units required water velocities of 1.0 ft/s or more to move.
- Single sheets of thin stainless-steel foil used in RMI (0.0025 and 0.0040 in. thick) can be transported by water flow velocities as low as 0.2 to 0.5 ft/s. Single sheets of thicker foil (0.008 in.) require higher velocities for transport of about 0.4 to 0.8 ft/s.
- Crumpled foils tend to transport at lower velocities than flat foils.
- Transport velocity tends to increase with material thickness except for easily flexible foils, where the thickness dependence is smaller.
- In all cases, the velocity of motion of the sample is much lower than that of the flow.

### Transport Modes

- Transport at lower velocities occurs when the foil sheet is flexible enough that a corner or edge can be bent up by the flow, thereby increasing the frontal area and therefore the drag. The resulting motion is one of intermittent folding, tumbling, and rolling.
- Rigid pieces tend to be transported by sliding along the bottom. Rigidity can result from greater thickness (0.008 in. and above) or small size (less than about 12 in. x 12 in. for 0.0025-in. foil). Higher flow velocities typically are needed for transport of rigid pieces than for transport of flexible pieces.
- Even with high flow velocities (about 2 ft/s) and large water depths (60 in. but velocity of only 1.6 ft/s), the samples were never observed to become waterborne.
- The vertical sides of the flume were observed to hinder the transport of samples. Samples contacting a wall were often pushed and folded against it, needing higher flow velocities to dislodge.
- When several pieces of foil were released simultaneously, their interaction during transport often caused the pieces to jam and become immobilized. High flow velocities (up to 1.8 ft/s) then were required to break up the jams and resume the transport.

### Blockage Modes

- Most foils readily flip vertically against the screen upon arriving there. Whether originally crumpled or not, the foils become flattened against the screen by the water force. An exception here is thicker foil (0.008 in.), which remains crumpled. The more flexible foils often become folded on the screen, blocking less than their surface area. The large 0.008-in.-thick foils, which exhibited rigidity relative to their transport mode but whose dimensions were larger than the water depth, often folded on the screen with a portion being caught under the trash rack.
- Because insulation specimens never became waterborne, they never blocked the screen above their width or length. Blockage up to the diagonal height was never observed, but this may be because the water depth was less than that height.
- When several foil pieces were released simultaneously, significant overlap was observed on the screen so that even if the total foil area was larger than the screen area (1.6 to 2.2 times), the screen was never blocked fully (only up to about 80% of the area was blocked).

### Limitations

- All the tests, except one for waterborne transport mode checking, were done with a water depth of 32 in. This depth was used to allow comparison with earlier studies; however, the depth could have an effect on the blockage modes because the characteristic dimensions of the pieces of RMI debris were less than the depth of the water.
- The flume width was only 6 ft. It is possible that sidewall effects could be present in the observed blockage modes. Because the sidewalls were observed to hinder transport, screen sections near the walls could have had a reduced probability of becoming blocked.

### **5.2.5 University of New Mexico Separate Effects Debris Transport Testing**

LANL and the University of New Mexico (UNM) conducted debris-transport experiments in the UNM Open-Channel Hydrology Laboratory.<sup>5-4,5-13</sup> The experiments were sponsored by the NRC Office of Regulatory Research as part of a research program supporting resolution of GSI-191. Measurements were made of the fundamental transport properties of various types of thermal insulation and other debris that could be generated as a consequence of a LOCA involving a PWR. The experiments and the results obtained are summarized below.

### Objectives

The overall purpose of the debris-transport experiments was to provide data to aid in assessing the potential effect of dislodged insulation and other debris on ECCS recirculation through the emergency sump. The specific objectives of the experiments were to measure the following properties for several types of insulation and other debris.

- Settling velocity—the terminal velocity of a material as it falls through water under the influence of gravity
- Flow velocity at incipient motion (tumbling or sliding) of sunken material—the minimum flow velocity required to initiate tumbling of the smaller pieces (within a given size class) or the pieces with special shapes that provide higher drag coefficients
- Flow velocity at bulk motion of sunken material—the flow velocity required to induce tumbling of a given class of debris
- Flow velocity required to convey material over a curb
- Flow velocity required for retaining debris on a screen after it's deposited there.

- The dissolution and erosion of debris, specifically calcium silicate insulation debris.

### **Methodology**

The debris transport experiments used two flumes, one smaller than the other. The smaller flume had a 10-ft-long, 1-ft-wide, and 1.5-ft-high test section and a maximum water depth of 1 ft. The larger flume had a 20-ft-long, 3-ft wide, 4-ft-high, test section. The larger flume was used in the majority of the experiments. The smaller flume was used to study the transport of calcium silicate debris and paint chips because

- (1) it was easier to clean debris from the smaller flume than from the larger flume and
- (2) smaller debris was easier to see in the narrower test section of the smaller flume.

The advantage of the larger flume was its capacity to accommodate larger scale turbulent flow structure and larger test specimens (e.g., intact RMI cassettes).

Both of the flumes had structures to condition the inlet flow such that a uniform unidirectional flow resulted in their test sections. To investigate the influence of turbulent flow structure on debris transport, the inlet flow conditioning structures in the large flume were removed in some experiments. The flow velocity in the flume was taken to be that associated with the measured volumetric flow of the pump spread uniformly over the flow section of the flume.

In some experiments, boards were placed on the floor of the flume across the width of the test section and directly in front of the screen to form a curb. The curbs were either 2 in. or 6 in. high and 2 in. long in the direction of flow. Photographs and diagrams of the larger flume used for the majority of the debris transport tests are shown in Figures 5-5 through 5-7.

A 34-in. long, 10-in. diameter graduated, transparent pipe stood on end, blanked off at the bottom, and filled with water served as a settling column for measurements of debris settling velocity.

The types of debris tested included LDFG, RMI, and calcium silicate insulations, Marinite fire-barrier material, and paint chips. Three makes of LDFG insulation were investigated: Nukon®, Thermal-Wrap, and Kaowool. Two types of RMI insulation were investigated: aluminum and stainless-steel RMI. The transport characteristics of epoxy-based paint chips ranging in size from 1/8 in. square to

1/2 in. x 1 in. were investigated. The chips had a median thickness of 15 mil. It may be important to note that the paint chips used in the transport tests may not have been prototypical of those that might be found in a containment pool;<sup>3</sup> however, these tests provide insights into their transport characteristics. Photos of typical samples of LDFG, RMI, and paint chip debris are shown in Figures 5-8 through 5-10, respectively.

### **Key Findings**

The transport data from the separate-effects tests are summarized in Table 5-1; flow dampening was used in the tests and illustrated in a series of bar charts. Characteristics ranged from the buoyant behavior of silicone to that of Marinite board, which readily sank. Figure 5-11 shows a comparison of terminal settling velocities for a variety of insulation debris types and paint chips. It should be noted that sizes and forms of debris different from the debris tested might not fit within these ranges; for example, individual fibers of LDFG tend to settle very slowly if at all.

The transport of debris moving along a floor was characterized by the flow velocity required to move the debris across the floor, which is referred to as the tumbling velocity, and the velocity required to cause the debris to jump an obstruction (curb), which is referred to as the lift velocity. These velocities were measured for onset of movement, i.e., incipient motion, and for bulk or mass movement of debris. The bulk and incipient tumbling velocities are compared in Figure 5-12, and the incipient lift and tumbling velocities are compared in Figure 5-13. Again, these data are for conditions of uniform flow velocities and low levels of flow turbulence. When lift velocities over a curb were measured, the curbs were free of other debris<sup>4</sup>. For most debris, the velocity differences between incipient and bulk motion were not substantial; that is, after the debris started to show movement (incipient), a relatively modest increase in velocity induced bulk movement of debris.

<sup>3</sup>Because of the wide variety of paint chemical compositions and wear conditions (new, aged, irradiated, etc.) and paint failure mechanisms (dimpled, curled, flaked, powdered, etc.), a spectrum of paint chips sizes, shapes, and compositions could be involved in a LOCA scenario, i.e., a prototypical paint chip sample is difficult to define.

<sup>4</sup>The effect of debris accumulation upstream the curb on the lift velocity was not investigated. It is likely that debris would lift over the curb more easily if accumulated debris first forms a sort of ramp upstream the curb.

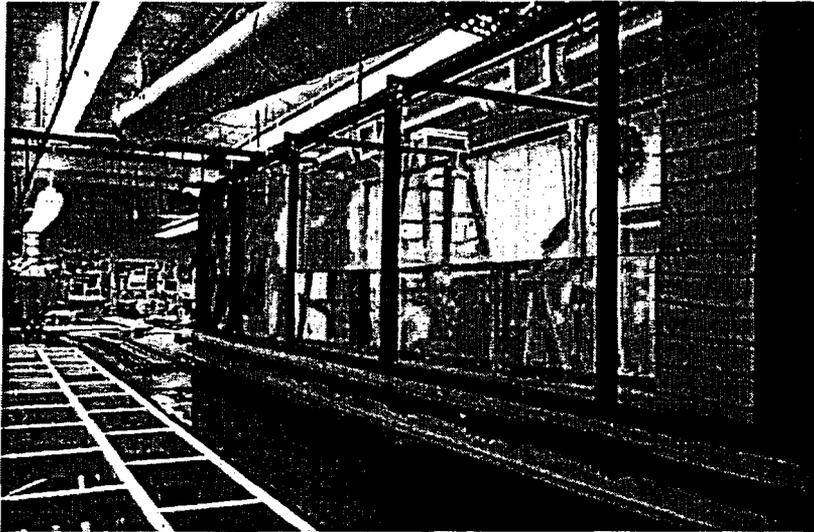


Figure 5-5 Photo of Large UNM Flume Test Apparatus

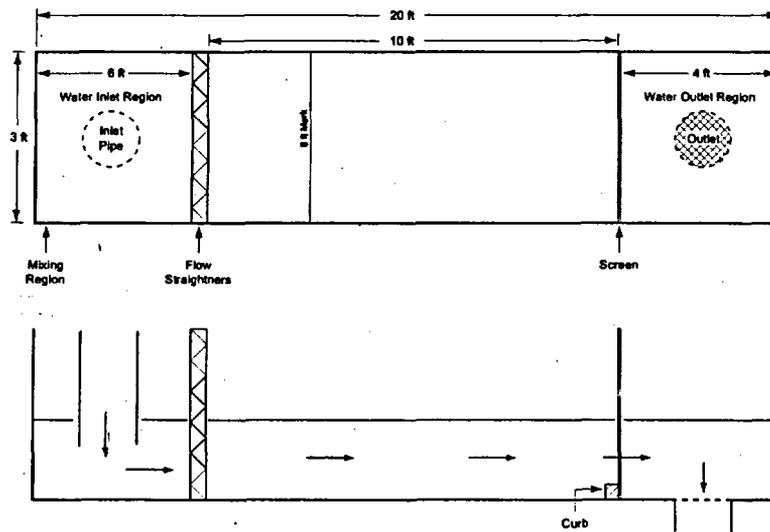


Figure 5-6 Diagram of Large UNM Flume Test Apparatus



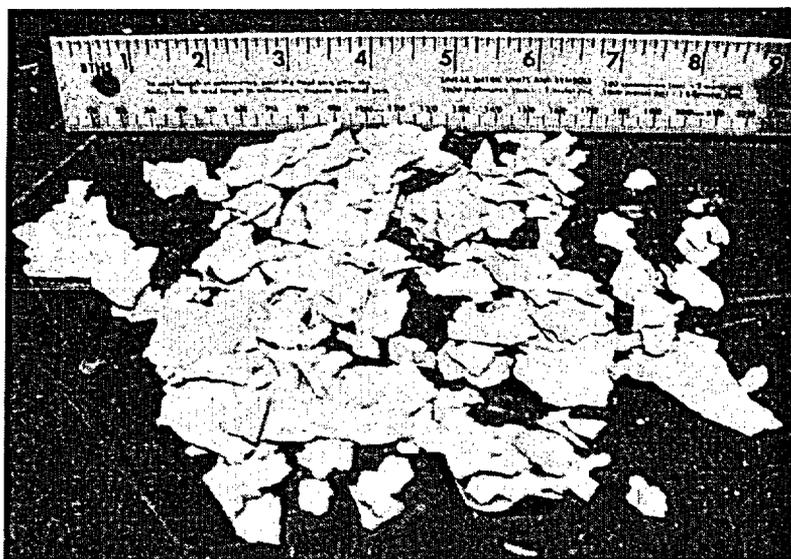
**Figure 5-7 Photo of Large UNM Flume Inlet Flow Conditioning Apparatus**



**Figure 5-8 Typical Test Sample of LDFG Insulation Debris**



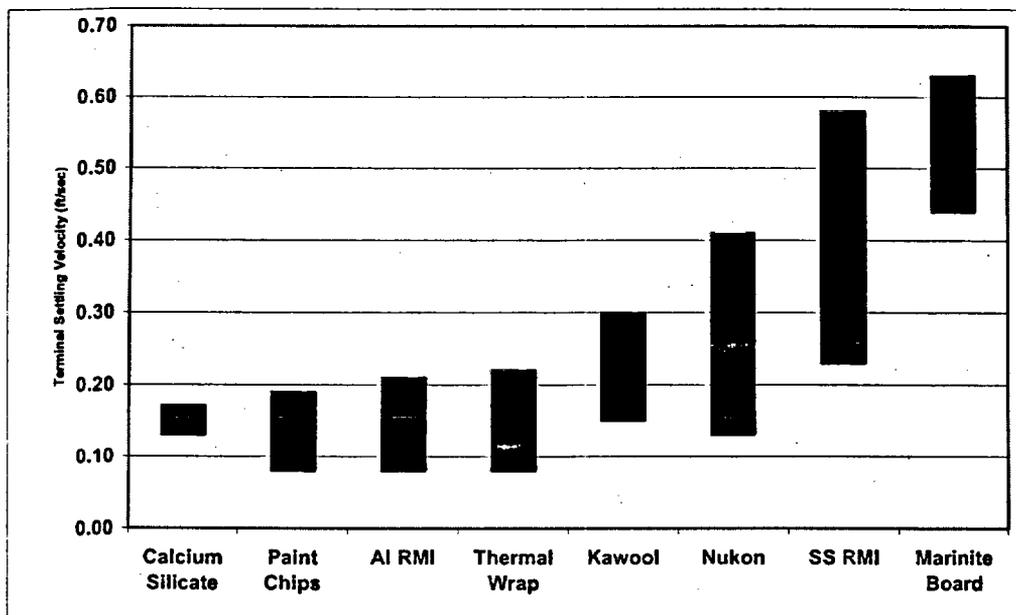
**Figure 5-9 Typical Test Sample of Aluminum RMI Insulation Debris**



**Figure 5-10 Typical Test Sample of Paint-Chip Debris**

**Table 5-1 Summary Data for Diffused Flow Entry Inlet Conditions**

Debris Type	Terminal Settling Velocity ft/s	Tumbling Velocities ft/s		2-in. Curb Lift Velocity ft/s		6-in. Curb Lift Velocity ft/s		Screen Retention Velocity ft/s
		Incipient	Bulk	Incipient	Bulk	Incipient	Bulk	
Calcium silicate	0.13 to 0.17	0.25	0.35	No Data	No Data	No Data	No Data	No Data
Paint Chip	0.08 to 0.19	0.40	0.45	0.50	> 0.55	No Data	No Data	No Data
Al RMI	0.08 to 0.21	0.20	0.25	0.30	No Data	0.37	No Data	0.11
SS RMI	0.23 to 0.58	0.28	0.30	0.84	No Data	> 1.0	No Data	0.12
Nukon	0.13 to 0.41	0.12	0.16	0.25	No Data	0.28	0.34	0.05
Thermal-Wrap	0.08 to 0.22	0.12	0.16	0.25	0.25	0.30	No Data	0.04
Kawool	0.15 to 0.30	0.12	0.16	0.25	0.25	0.41	0.41	No Data
Marinite Board	0.44 to 0.63	0.77	0.99	No Data	No Data	No Data	No Data	No Data
Silicone Foam	Always Floats	N/A	N/A	N/A	N/A	N/A	N/A	N/A



**Figure 5-11 Comparison of Terminal Settling Velocities**

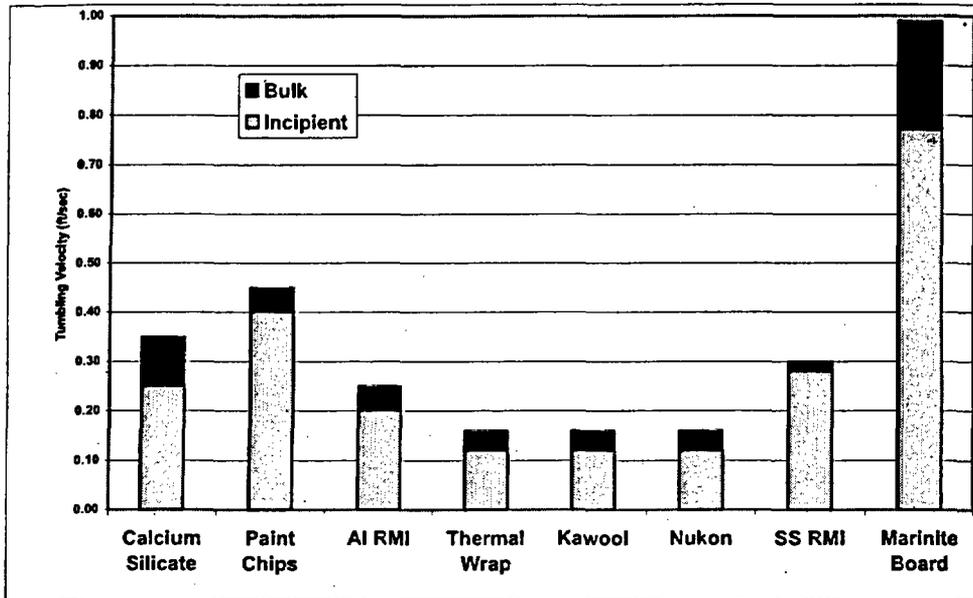


Figure 5-12 Comparison of Incipient and Bulk Tumbling Velocities

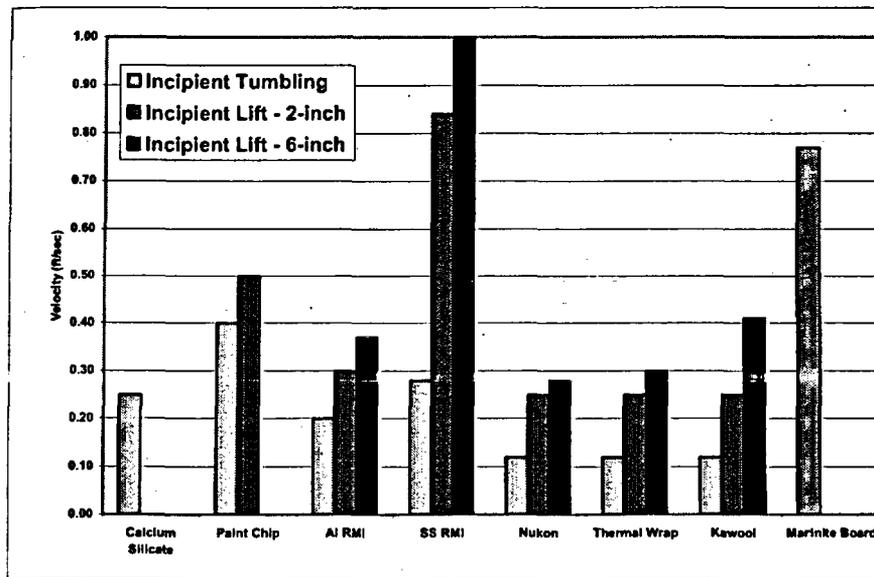


Figure 5-13 Comparison of Incipient Lift Velocities to Incipient Tumbling Velocities

The flow velocity needed to keep a piece of debris on the screen was less than the velocity needed to initiate transport of the debris on the screen. After debris arrives at the screen, it generally can be expected to stay on the screen.

The disintegration characteristics of calcium silicate insulation were investigated. Experiments were performed in which single fragments of calcium silicate were weighed and then dropped into three different water baths. One bath was maintained at ambient temperature (approximately 20°C), a second was maintained at elevated temperature (approximately 80°C), and a third was maintained at elevated temperature with occasional stirring. The fragments were subjected to these conditions for 20 min, after which the water was drained and the residue was dried and weighed. In the ambient-temperature bath, 18% of the calcium silicate separated from the original sample and went into suspension. Although not ascertained through weighing, stirring the water (after the 20 min of the test had passed) seemed to have little effect on the disintegration. In the 80°C bath, 46% of the calcium silicate separated from the original sample and went into suspension. Clearly, hot water furthered disintegration. In the 80°C bath with occasional stirring, 76% of the original sample disintegrated into suspension. Clearly, stirring furthered disintegration in the case of hot water.

Pieces of Marinite were submerged in boiling water for 30 min to investigate the tendency of the material to disintegrate. The Marinite became soft and rubbery on the surface but did not disintegrate. Small amounts of material could be pulled from the surface but not especially easily. As such, it was conjectured that the levels of agitation that might develop in a containment pool would not cause Marinite material to disintegrate.

The transport properties of silicone foam insulation were also investigated. The foam was found to be entirely resistant to sinking. In the flume, foam insulation fragments floated on the surface and moved with the flow.

#### **Limitations**

The debris transport tests had few limitations, discussed in the following paragraphs.

Most of the experimental data taken applies to flow fields where the turbulence has been damped out and the flows are uniform. Some data were taken where the dampeners were removed from the tests to qualitatively determine the effect of turbulence on

debris transport and turbulence was shown to enhance debris transport. However, no method was identified to quantitatively evaluate the effect of turbulence in an actual PWR sump pool.

The paint chip samples used in the transport tests were not taken from a PWR containment, and the samples were not pretreated in such a way to make them representative of actual containment paint. Actual paint likely would have aged and perhaps have been irradiated. There are many types of paints used in containment and under a variety of environmental conditions. The data matrix (Table 5-1) was not filled completely.

The effect of debris accumulation upstream the curb on the debris lift velocity was not investigated.

#### **5.2.6 University of New Mexico Integrated Debris Transport Testing**

Experiments were conducted to examine insulation-debris transport under flow conditions and geometric configurations typical of those found in PWRs.<sup>5-3</sup> These experiments, which were sponsored by the NRC as part of a comprehensive research program to support the resolution of Generic Safety Issue (GSI) 191, were conducted by LANL at the Open-Channel Hydrology Laboratory operated by the University of New Mexico. The integrated testing was performed using a large tank with provisions to simulate a variety of PWR containment/sump features. The test program was designed to explore the effect of various containment internal structures on debris transport and from that draw inferences on the features of containment that could affect debris transport significantly. These tests were not planned to be "scaled" tests; instead, the focus was to simulate the sequential progression of various phases of accident progression and examine the overall effect on debris transport. The integrated phenomena included debris transport during the fill-up phase (i.e., while the sump and tank were being filled) and after steady-state conditions were achieved (i.e., water flow from the break is equal to the flow out the sump).

The integrated debris transport tests provide data to support the development and/or validation of appropriate analytical simulation models designed to evaluate debris transport in a PWR containment sump on a plant-specific basis. For example, the tests developed data that could be used to benchmark computational fluid dynamics (CFD)-based simulations supporting estimates of debris

transport in water pools formed on PWR containment floors. The insights gained from these tests specifically include the relative importance of the various debris transport mechanisms and containment geometry features, such as the important features of the containment layout and sump positioning that affect debris transport and accumulation on the sump screen. The physical processes and phenomena to which the observations pertain include flow patterns and flow turbulence, debris floatation, gravitational debris settling, the transport of debris along the pool floor, debris entrapment mechanisms, re-entrainment or retention of trapped debris, and disintegration of debris within the pool. The debris used in the test program included primarily fiberglass and RMI debris of different sizes and shapes. The debris was of sufficiently small size not to be affected by the scaling issues.

#### **Objectives**

The experimental program was designed primarily to complement concurrent CFD calculations by providing three-dimensional data for validating the CFD results. The experiments had three objectives.

- Provide debris-transport data and velocity field data that can be used to validate CFD calculations pertaining to three-dimensional transport phenomena in water pools formed on PWR containment floors.
- Identify features of containment layout and sump positioning that could affect debris transport to the sump and debris accumulation on the sump screen.
- Provide insights for developing a simple method (or criteria) that could be used for each plant-specific configuration to conservatively attest to its safety. Such methods potentially could be used in lieu of complex analyses (e.g., CFD), and may consist of performing small-scale experiments and/or one-dimensional (1-D) flow calculations, similar to those suggested in Ref. 5-14.

#### **Setup**

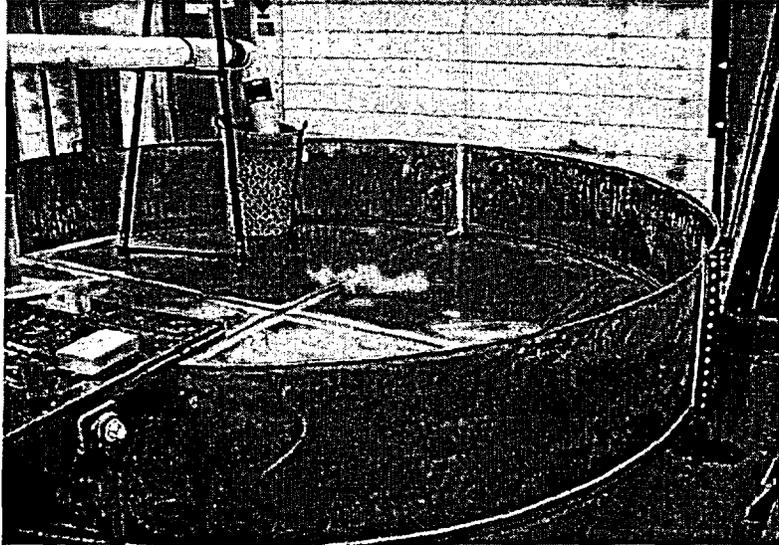
The tests were conducted in a steel tank that was 13 ft in diameter, and 2.5 ft deep, and open at the top, as shown in Figure 5-14. The floor of the tank was covered with high-strength concrete and leveled. The floor and the tank inner surfaces were coated with epoxy paint typical of PWRs. An outlet box designed to simulate a PWR containment recirculation sump was installed as shown in Figure 5-15 to drain water from the tank. The outlet box is 30 in. long, 14.5 in. wide, and 20 in. deep

with a volume of 5.3 ft<sup>3</sup> (approximately 40 gal.). Water was pumped at variable speeds into the test tank from a below-floor reservoir by an overhead pipe and, in some tests, through a coarse diffuser designed to reduce inlet flow turbulence. The tank was drained at the outlet box after water flowed through the outlet screen that was used to collect debris transported to the outlet box. Debris collected on the outlet screen (both horizontal and vertical orientation were investigated) provided quantitative measurements of (a) the amount of debris that reached the sump screen and (b) the location of the remaining debris on the tank floor. Qualitative velocity mapping included local velocity measurements during steady state.

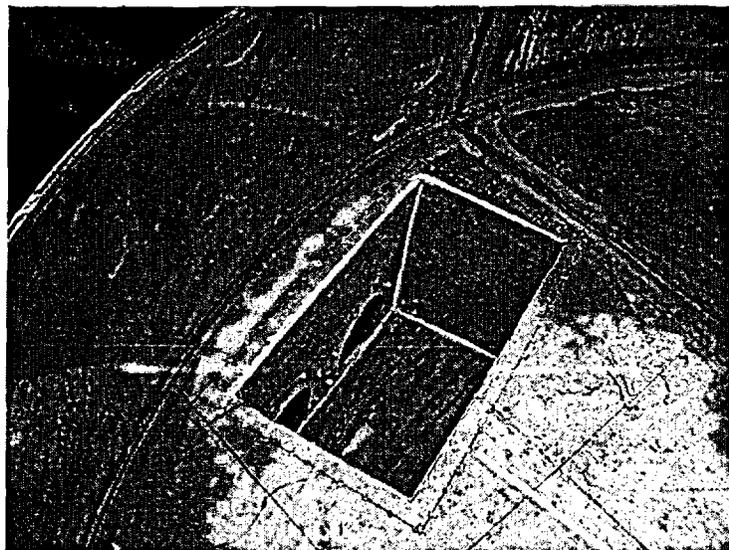
Structures were placed in the tanks that were designed to simulate the floor features of a typical PWR containment sump and to simulate this type of variability in PWR containment sump geometries. The location of the inlet pipe, one of the primary test parameters, was varied during the course of testing, resulting in three test configurations, A, B, and C, as shown in Figures 5-16, 5-17, and 5-18, respectively. In the latter tests, the interior walls nearest to the outlet box were removed to simulate an exposed sump condition, resulting in Configuration D as shown in Figure 5-19. In Configuration A, the inlet pipe was located well away from the outlet box, and the inlet pipe in Configuration D was located near the outlet box, thereby effectively simulating a remote sump and a fully exposed sump, respectively.

#### **Methodology**

The tests conducted during the course of the test program were broadly divided into three categories according to their purpose. The first category examined debris transport in the tank as it filled with water for a variety of insulation debris types and surrogate tracer particles. In these fill-up tests, debris was placed on the floor of the tank before the tank was filled. The second category of tests was designed to provide insights into the short-term transport of LDFG insulation debris. These tests were carried out over a period of 30 min and measured the fraction of debris that reached the outlet in that time. Several parameters were varied in the conduct of these tests that allowed test-to-test comparisons in which a single specific variable was altered. The third group of tests was carried out over an extended period (up to 6 h) to study the longer-term transport of LDFG debris in a configuration of the tank that tended to keep the debris stirred up (i.e., where the tank outlet was not far from the falling water stream entering the tank).



**Figure 5-14 Steel Tank Used in Integrated Testing**



**Figure 5-15 Integrated Test Tank Outlet Box**

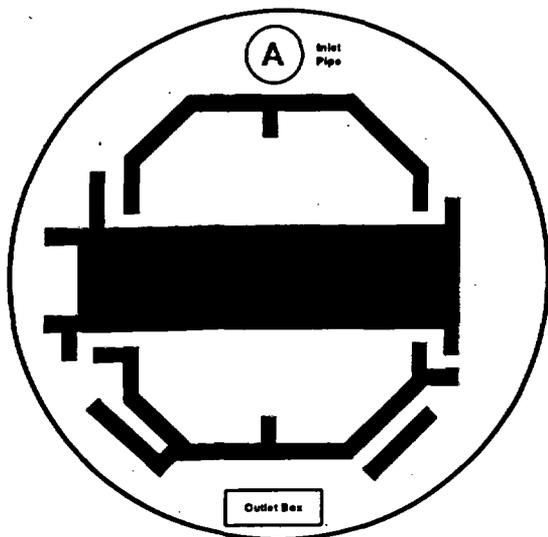


Figure 5-16 Test Configuration A

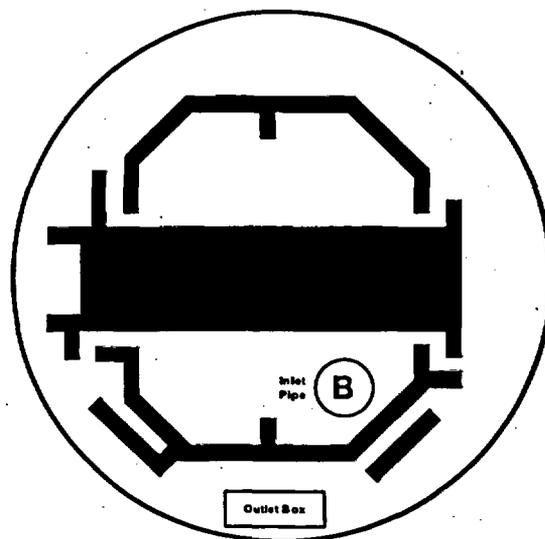


Figure 5-17 Test Configuration B

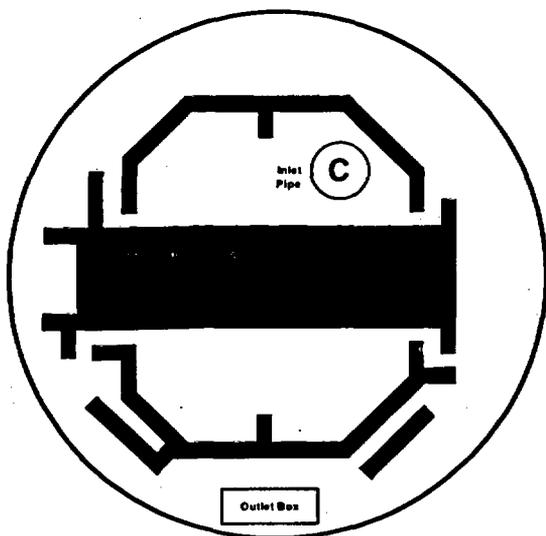


Figure 5-18 Test Configuration C

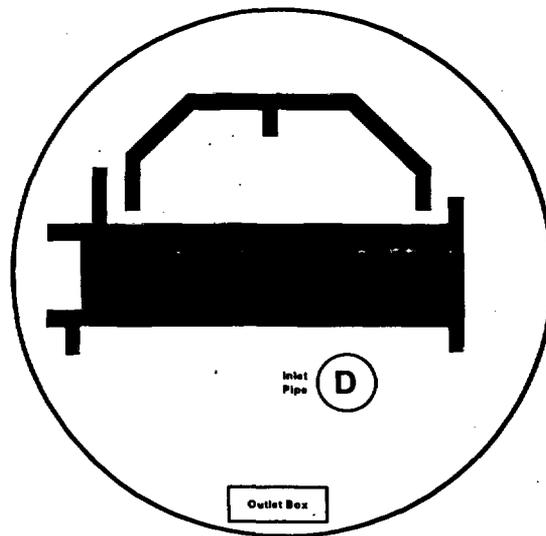


Figure 5-19 Test Configuration D

Of particular interest was the transport of fine debris. These longer-term tests provided time-dependent transport data. Data from selected tests were compared with CFD simulations of those tests to provide both further insights into the test results and insights into the ability of a CFD code to predict the complex flow patterns of the test. These simulations are addressed in Section 5.3.6.

### **Key Findings**

The integrated debris-transport test program provided data for various combinations of inlet conditions, four geometrical configurations, two screen configurations, and different debris types. The conditions of the tests establish quiescent, turbulent, and rotational flow regimes within each test. Two phases of debris transport were examined: (1) debris transport during the period when the sump is filling with water and then (2) debris transport after the pool has filled. Important insights, observations, and findings from the test program include the following.

- Debris transport depended greatly on the buoyancy of each piece of debris. Fragments of buoyant foam insulation confirmed that truly buoyant debris simply floated across the top of the water surface until it reached either a quiescent region, where it remained, or the outlet screen. Neutrally or near neutrally buoyant debris stayed suspended in the pool even when the water was relatively quiescent. The most notable neutrally buoyant debris was the individual fiber or small clumps of fibers from fibrous insulation, which did not settle any place in the tank within the time frame of the tests. In the absence of significant pool agitation, nonbuoyant debris sank to the bottom of the pool, where its transport was a result of tumbling and sliding across the floor when the flow velocities were sufficiently high. Floor-level obstacles, such as a shallow barrier placed across the annulus, affected floor debris transport.
- Debris transport occurred in two phases:
  - (a) the fill-up transport phase, which is analogous to the pre-ECCS switchover containment sump fill-up phase, and
  - (b) the steady-state transport phase, which is representative of post-switchover conditions.

Debris placed initially on the tank floor before pump flow began underwent transport associated with the initial fast-moving flows as the tank began to fill, as well as undergoing steady-state pool transport after the tank

reached steady state (and all intermediate flow conditions). In contrast, debris introduced after the steady-state pool was established was subjected simply to steady-state pool transport. Depending on the test configuration, the spreading of the fill-up transport phase inlet flow demonstrated the ability to push debris away from the outlet screen or toward the screen, thereby either reducing or enhancing the debris-transport fraction. The fill-up flows also pushed debris into relatively quiescent inner compartments, where the debris tended to remain for the duration of the test.

- Pool turbulence associated with the inlet flow kept most small debris, including RMI debris, near the inlet in suspension and rather well mixed and further degraded fragile insulation fragments. The effect of the turbulence lessens with distance from the inlet, and all but the finer (nonbuoyant) debris settled to the sump floor before reaching the sump as the turbulence subsided. The distance required for the turbulence to dampen was dependent on the test configuration. With the inlet near the outlet screen, the turbulence of the inlet flow affects the accumulation of debris on the screen. In addition to keeping debris in suspension near the screen, turbulence could remove accumulated debris from the screen. Debris could be returned to the screen repeatedly, thereby increasing the residence time of the debris within the turbulence and enhancing further disintegration of the debris.
- Several of the containment features and structures represented in the integrated tests offered the potential for debris entrapment because of the rather complex flow patterns that these features established in the pool. Entrapped debris was observed in quiescent regions, such as inner compartments not associated with the inlet location, regions offset from the main flow, the centers of rotational flow (vortices) formed by flow-path expansion, and behind floor barriers. Debris stopped behind a barrier was likely to remain there unless the flow velocities and turbulence were sufficient to lift it over the barrier.
- LDFG insulation debris was found to undergo significant additional fragmentation when it was subjected to the intense, thrashing flow agitation associated with the inlet flow plummeting into the pool. Disintegration appeared to increase when the experiments did not use a flow diffuser and the insulation debris was added to the tank very close to the inlet. Such disintegration affects debris transport and

head loss because it results in the generation of additional fine debris that remains suspended even at low levels of pool turbulence. In addition to LDFG, calcium silicate insulation would undergo substantial disintegration. In the separate-effects tests, calcium silicate fragments were found to dissolve, resulting in a fibrous residue that can be transported easily. The chemical environment may accelerate this disintegration further.

- The beds of LDFG debris that formed on the outlet screen generally consisted of the accumulation of fine fibrous debris that normally remained suspended in the pool and of small pieces of debris that accumulated at the bottom of the screen and then occasionally "rolled up" onto the screen. Although the relative contributions of the two processes could not be determined explicitly, observations suggested that the quantities of accumulated fine, suspended debris were substantially greater than the quantities of debris transported across the floor. Because the fine debris remained suspended and reasonably well mixed in the tank pool, it tended to form a uniform layer across the entire cross section of the screen (that was under water), but the occasional roll-up pieces of debris contributed to its lumpiness. The approach velocities in the integrated tank tests (about 0.11 to 0.14 ft/s) were normally high enough to move pieces of LDFG along the floor to the outlet screen but were generally not high enough to lift a piece of LDFG from the floor to positions higher on the screen. Pulsations associated with flow turbulence occasionally provided the needed boost to lift a piece of debris onto the screen. If sufficient debris were to accumulate at the bottom of the screen to clog the bottom portion of the screen, the approach flow could be redirected upward at the floor level; this redirection could enhance debris lifting.
- RMI debris-transport tests indicated that the most important aspect of evaluating RMI debris transport is probably the transport during the fill-up phase, when the transport velocities associated with the fast-spreading flows can effectively push substantial RMI debris in the direction of the flow. Both stainless-steel RMI and aluminum RMI debris was pushed readily either toward the outlet screen or away from it, depending on the test configuration. After the tank became sufficiently flooded to slow water flows, the RMI did not substantially transport at the tank velocities normally tested. Pieces of RMI debris that were dropped into an

established steady-state pool sometimes floated a significant distance before sinking because air was trapped within the debris.

- Tests of an intact RMI cassette and an insulation pillow showed the ability for fill-up phase flows to transport these types of debris toward a sump screen. These components moved much more easily when dry than when saturated with water. After they were saturated, only the fill-up-phase flow velocities were fast enough in the integrated tests to move these intact items. In a PWR plant scenario, these items could be transported some distance during the fill-up phase until they become saturated or the pool level deepens sufficiently to slow the fill-up flow velocity. These types of debris have potential to block pathways connecting internal compartments.
- Comparisons of pool velocity measurements and debris movement data with CFD predictions provided a qualitative confirmation that CFD codes are suitable for providing the framework for modeling and analyzing debris transport.

The primary use of the data generated from the integrated test program should be the insights gained regarding the transport of debris and the accumulation of debris onto a sump screen. These insights should be valuable in the development of analytical debris-transport models. However, the actual transport fractions should not be applied directly to plant-specific analyses because there is no apparent means of scaling those transport fractions from the test geometry to an actual plant. (See Section 5.4.) Further, the flow velocities of the actual plant could be substantially different from the velocities of the integrated tests. Rather, the models must apply the debris transport phenomenology in conjunction with the separate effects debris transport data to all of the individual plant features for each specific plant. Another potential use of the integrated test data would be to use the data to benchmark a specific debris transport model (e.g., a CFD-based simulation), that is, show that the model can predict the measured transport fractions of the integrated tests.

### 5.2.7 Bremen Polytechnic Testing of KAEFER Insulation Systems

Extensive buoyancy, transport, and head loss tests were conducted on KAEFER insulation systems by Bremen Polytechnic, Department of Naval Architecture and Ocean Engineering, Laboratory for Ship Hydromechanics/Ocean Engineering.<sup>5-15</sup> There

is excellent photographic documentation of these tests in the identified reference. The buoyancy and transport aspects and the results of the experiments are summarized below. The head loss aspects and the results of the tests are not addressed here.

#### **Objective**

The objective of the buoyancy tests was to measure the time taken for a material to submerge and the additional time taken for a submerged material to sink. The objective of the transport tests was to determine the flow velocity needed to first initiate movement of a sunken material, the velocity needed to maintain motion of the material, and the velocity needed to flip the material up against a vertical screen.

#### **Methodology**

##### **KAEFER Insulation Systems Tested**

A representative collection of KAEFER insulation samples was tested. All of the samples had been conditioned by heating at 350°C for a minimum of 15 h. Mattresses of fibrous insulation and cassettes of steel-encapsulated fibrous insulation of rectangular and circular cross section were tested. Base insulation materials of fiberglass and mineral wool were investigated, as were RMI cassettes and cassettes of steel-encapsulated silica. Three sample types/sizes were tested:

- As-fabricated: 700 mm x 700 mm, 100 mm thick (mattress or cassette)
- Fragments: As-fabricated samples cut in half transversely to expose the base insulation material
- Shreds: Base insulation material cut randomly into smaller pieces no larger than 50 mm square

Figure 5-20 shows the samples of KAEFER insulation systems tested.

##### **Test Setup**

A 1-m-square, 0.8-m-deep tank was used in the buoyancy tests. The water in the tank was maintained at a temperature of 49°C (120°F). Two differing chemical conditions of the water in the tank were established. They are identified in Table 5-2.

De-ionized water was sprayed onto the insulation samples continuously during the buoyancy tests. The spray water was not heated.

A 14-m long, 1.4-m wide flume with a water depth of 0.800 m was used to carry out the transport tests.

#### **Key Findings**

The key findings of the buoyancy tests performed on KAEFER insulation systems are identified below. (Note that "remained afloat" means the material was still floating after at least 2 h.)

- All as-fabricated mattresses sank quickly (18.2 to 45.5 s).
- Mattress fragments sank quicker than as-fabricated mattresses (14.7 to 23.3 s).
- Mattress shreds sank in several seconds.
- As-fabricated cassettes with fibrous base insulation remained afloat.
- As-fabricated cassettes with silica base insulation remained afloat.
- Some as-fabricated RMI cassettes sank (18 to 37 min) and some remained afloat.
- Cassette fragments with fiberglass base insulation remained afloat. This is inconsistent with the findings above—that mattress insulation material sinks quickly. The inconsistency is thought to be related to differences associated with the conditioning (heating) of the samples. Although all samples were heated for the same time at the same temperature, it was noticed that the base fiberglass insulation in cassettes had a much darker color than the fiberglass insulation in mattresses. The suspicion is that the darker color is indicative of changed material properties, including buoyancy characteristics.
- Fiberglass shreds removed from cassettes also remained float.
- Cassette fragments with mineral wool base insulation sank within a few minutes.
- Some cassette fragments with silica base insulation sank (9 to 52 min) and some remained afloat.
- RMI cassette fragments sank in several minutes.
- Only insignificant variations with water pH were seen.

Illustrative photographs of the buoyancy tests are included in the Bremen report of the buoyancy tests. Figure 5-21 is an example.

The key findings of the transport tests performed on the KAEFER insulation systems follow.

- As-fabricated mattresses began to show movement at flow velocities between 0.15 and 0.33 m/s.



**Figure 5-20 Samples of KAEFER Insulation Systems Tested**

<b>Table 5-2 Water Chemical Conditions in KAEFER Insulation Buoyancy Tests</b>		
<b>Chemical</b>	<b>pH 7.0</b>	<b>pH 9.2</b>
Boric acid	1800 ppm	1800 ppm
Sodium	84 ppm	2400 ppm

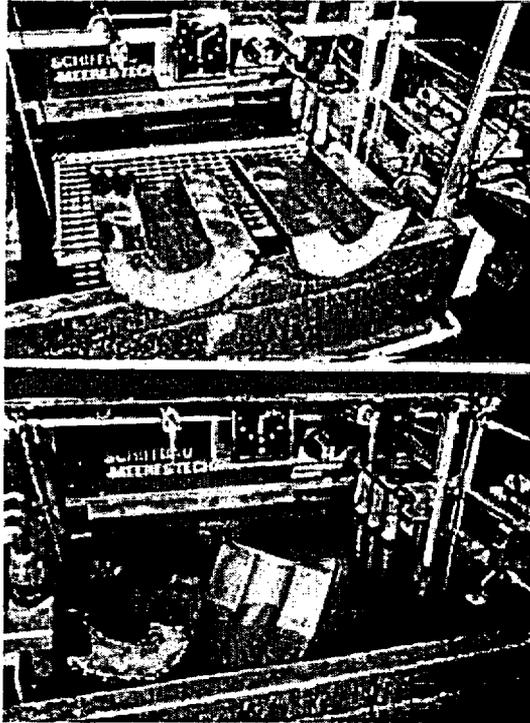


Figure 5-21 Bremen Buoyancy Test Illustration

- Mattress fragments began to move at velocities between 0.19 and 0.27 m/s.
- Fibrous insulation shreds began to move at velocities between 0.06 and 0.26 m/s.
- As-fabricated cassettes with fibrous base insulation began to move at flow velocities between 0.04 and 0.15 m/s.
- Cassette fragments with fibrous base insulation showed movement between 0.19 and 0.48 m/s.
- Fragments of cassettes having silica base insulation and RMI cassettes showed movement at flow velocities between 0.38 and 0.54 m/s.
- The velocity required to maintain the motion of a sample down the flume was typically slightly higher than the velocity first noticed to cause motion. The velocity required to flip material up against a vertical screen was slightly higher still.

**Limitations**

There is substantial spread in the data reported on the flow velocity needed to move seemingly very similar KAEFER insulation samples. The differences are not explained in the test report.

**5.2.8 Alden Research Laboratory Testing of Owens-Corning Fiberglass (NUKON) Insulation**

Alden Research Laboratory conducted transport and head loss experiments on nonencapsulated NUKON® insulation manufactured by Owens-Corning Fiberglass Corporation.<sup>5-16</sup> NUKON® is a LDFG thermal insulation widely used in nuclear power plants. The transport aspects and results of the experiments are summarized below. The head loss aspects and results are discussed in Section 7.

**Objective**

The transport tests were aimed at determining the flow velocity needed to initiate motion of sunken NUKON® insulation fragments of various sizes.

**Methodology**

The tests were conducted in a 2-ft wide, 2-ft deep, 20-ft long flume. Water was introduced at one end of the flume behind a flow-straightening screen; it exited at the other end over a gate of adjustable height. The gate was far enough downstream from the test section to ensure a lack of velocity-profile disturbance.

The samples of insulation of various sizes first were sunk (which required prolonged squeezing under water) and then were placed at the bottom of the flume. Flow was initiated, and the flow velocity at which sustained motion of the samples occurred was recorded. Velocity was measured approximately 3 in. above the bottom of the flume. The water depth was 1.5 ft.

**Key Findings**

Table 5-3 lists the flow velocities needed to initiate motion of NUKON samples varying in size from shreds to 12 in. x 12 in. x 2 in. The velocities needed to initiate motion of the insulation samples were rather independent of sample size, although a trend toward higher velocities for larger sample sizes can be detected.

**Limitations**

The test report did not discuss pretreatment of debris samples before they were introduced into the water. The report did state that prolonged squeezing of the samples under water was required to induce the samples to sink. More recent testing pretreated samples in heated water for a significant period to removed trapped air before introducing them into the test. Possible residual air trapped in the debris samples of these tests could have compromised the test results.

**5.2.9 STUK Metallic Insulation Transport and Clogging Tests**

A set of experiments investigating the transport characteristics and strainer-clogging potential of a specific type of RMI debris was carried out in the Imatran Voima Oy (IVO) Power Plant Laboratory for

the Finnish Centre for Radiation and Nuclear Safety (STUK).<sup>5-17</sup> The following summary of the experiments is adapted from the reference cited above.

**Summary**

A series of experiments was conducted to quantify the transport characteristics and strainer-clogging potential of RMI debris. The experiments investigated DARMET insulation, the brand of metallic insulation that has been installed in Finnish BWRs. As the size and shape distribution of LOCA-generated metallic insulation debris is undefined, the study was conducted in a parametric manner, assuming that size can vary from 0.01 to 1 m and concentrating on fairly flat pieces. Most of the pieces investigated were square or rectangular, although triangular pieces and strips also were tested.

The experiments addressed settling, transport in both horizontal and vertical circulating flow fields, and strainer head loss caused by both metal foil pieces alone and foil pieces mixed with fibrous mineral wool debris. The effect of foils on the back-flushing of a clogged strainer also was investigated. The major findings related to settling and transport are summarized below. (Valuable observations of how RMI foils build up on a sump screen and measurements of related head loss were documented in the experiments.) These observations are presented in Section 7, "Debris Head Loss."

- Metallic foils of all shapes tended to float. Foils had to be submerged and agitated to remove air bubbles before they would sink.

Sample Size (in.)	Flow Velocity Needed to Initiate Motion (ft/s)
12 x 12 x 1/2	0.35
12 x 12 x 2	0.36
6 x 6 x 1/2	0.34
6 x 6 x 2	0.37
3 x 3 x 1/2	0.30
3 x 3 x 2	0.36
1 x 3 x 1/2	0.28
1 x 3 x 2	0.26
1/2 x 1/2 x 1/8 (shred)	0.30

- Settling velocities ranging from 0.03 to 0.4 m/s were measured. Swinging/gliding, tumbling, and screw-like settling motions were observed. Settling with horizontal swinging/gliding was the most stable and took the most time. Only the largest pieces, > 0.6 m, folded significantly during settling because of the rigidity of the dimpled foil. Pieces that descended in horizontal orientations did so at velocities ranging from 0.04 to 0.08 m/s. Size had little effect on settling velocity.
- In horizontally circulating flow, crumpled pieces of metallic insulation moved readily at flow velocities between 0.1 and 0.2 m/s. Smaller, flatter foils required higher velocities to move than larger, crumpled foils.
- In a vertically rising flow, metallic insulation foils became waterborne if the upward flow velocity exceeded the settling velocity of the foil. In a vertically circulating flow, foil pieces exhibited circulatory motion within the flow field and remained water borne. Foil pieces settled at the threshold velocity above which foil circulation was sustained.
- From a settled condition, foils dispersed and became waterborne as the flow rate was increased.

### 5.3 Debris Transport in Pooled Water Analyses

The NRC has performed analyses investigating the transport of insulation and other debris in PWR containment sump pools, BWR drywell floor pools, and BWR suppression pools. The results of these analyses provide qualitative insights and quantitative information relevant to considerations of debris transport in PWR containment pools.

#### 5.3.1 Phenomena Identification and Ranking Tables

##### 5.3.1.1 Boiling-Water Reactor Phenomena Identification and Ranking Table

The NRC sponsored the formation of a PIRTs panel of recognized experts with broad-based knowledge and experience to identify and rank the phenomena and processes associated with the transport of break-generated debris through a BWR containment drywell following the initiation of one or more accident sequences.<sup>5-2</sup> The primary objective of the BWR PIRT was to support the drywell debris transport study (DDTS); the pool-transport portion of the study is discussed in Section 5.3.2. The PIRT process was designed to enhance the DDTS

analysis by identifying processes and phenomena that would dominate the debris transport behavior. Further, these processes and phenomena were prioritized with respect to their contributions to the reactor phenomenological response to the accident scenario. The PIRT panel also evaluated the plans for experimental research, the experimental results, and the analytical results. Their final report was updated to reflect the final results of the DDTS. Debris transport in the BWR drywell floor has similarities to debris transport in a PWR sump pool: both pools would be relatively shallow, both have water falling into the pool from break overflow and containment spray drainage, and both can have turbulent or quiescent modes of debris transport, depending on scenario conditions. The phenomena ranked as having the highest importance with respect to debris transport within a BWR drywell floor pool are listed in Table 5-4.

#### 5.3.1.2 Pressurized-Water Reactor Phenomena Ranking and Identification Table

Like the BWR PIRTs discussed in Section 5.3.1.1, the NRC sponsored the formation of a PIRT panel of recognized experts with broad-based knowledge and experience to identify and rank the phenomena and processes associated with the transport of debris in PWR containments following the initiation of one or more accident sequences.<sup>5-1,5-18</sup> The PWR PIRT has been used to support decision-making regarding analytical, experimental, and modeling efforts related to debris transport within PWR containments. The scope of the PWR PIRT was discussed in Section 4.3.2.2, which discussed the airborne and washdown transport aspects of the PIRT.

The panel identified a primary evaluation criterion for judging the relative importance of the phenomena and processes important to PWR containment debris transport. Each phenomenon or process identified by the panel was ranked relative to its importance with respect to the transportation of debris to the sump entrance. Highly ranked phenomena and processes were judged to have a dominant impact with respect to the primary evaluation criterion. The important processes relating to debris transport in a PWR sump pool are listed and described in Table 5-5.

It is important to note that the processes and phenomena ranked as highly important by the PIRT panel sometimes differed from the processes and phenomena that appeared to dominate transport in the experiments or analyses, because the PIRT assessments were done before the research was

<b>Table 5-4 Highly Ranked Phenomena from BWR Drywell Floor Pool Debris Transport PIRT Table</b>	
<b>Processes and/or Phenomena</b>	<b>Description</b>
Pool Formation	Creation of a pool of water on the drywell floor sufficiently deep to allow overflow into wetwell transfer piping due to the accumulation of water from all sources higher in the drywell.
Pool Overflow	Transport of water from the pool on drywell floor into wetwell vent pipes.
Pool Flow Dynamics	Multi-dimensional flow patterns and velocities within the pool of water on the drywell floor; includes free-surface (vertical) velocity profile and turbulent mixing (circulation) flows.
Pool Debris Transport	Relocation of debris in the pool of water on the drywell floor toward wetwell vent pipe entrances.
Debris Settling	Downward relocation (sedimentation) of debris within the pool of water on the drywell floor under the force of gravity.

<b>Table 5-5 Highly Ranked Processes and Phenomena for the Debris Transport in a PWR Containment Sump Pool</b>	
<b>Processes and/or Phenomena</b>	<b>Description</b>
Pool Formation	Creation of a pool of water on the containment floor sufficiently deep to allow overflow into sump due to the accumulation of water from all sources higher in the containment.
Pool Agitation	Agitation of the pool by liquid streams falling or draining from above.
Pool Flow Dynamics	Multidimensional flow patterns and velocities within the pool of water on the containment floor; including increasing pool height, circulating flows, and turbulent mixing flows.
Film Entry Transport	Introduction of debris into the pool on the containment floor as draining films containing debris enter the pool.
Liquid Entry Transport	Introduction of debris into the pool on the containment floor as draining liquid streams containing debris enter the pool.
Pool Debris Disintegration	Breakup of relatively large pieces of debris into smaller particles that can be reentrained into the flow stream caused by the impact of falling liquid streams from the break, fan coolers, and liquid draining off surfaces.
Pool Debris Settling	Downward relocation (sedimentation) of debris within the pool of water on the containment floor under the force of gravity.
Pool Debris Reentrainment	Movement of debris residing off the basement floor and into higher elevations of the pool.
Pool Debris Transport	Relocation of debris in the pool of water on the containment floor toward sump entrances.
Sump-Induced Flow	Following sump activation, a directed flow is established toward the sump.
Sump-Induced Overflow	Transport of suspended debris over the sump curb and to the trash rack/debris screen. In addition to the sump curb, the buildup of ramp-like debris beds at the base of the curb must be considered for their impact on flow patterns and debris transport.

performed. One such process was sheeting flow dynamics (the spreading of water on the containment floor before the pool is formed) with associated sheeting debris transport, which the PIRT panel ranked as having low or medium importance. However, the data from the integrated tank tests indicated that debris transport caused by sheeting flow could be very important. Thus, evaluating the importance of a process or phenomena should not be based solely on the PIRT evaluation.

### 5.3.2 Boiling-Water Reactor Drywell Floor Pool Debris Transport Study

In September 1996, the NRC initiated a study, the DDTS, to investigate the transport and capture characteristics of debris in BWR drywells using a bounding analysis approach.<sup>5-19</sup> The focus of the DDTS was to provide a description of the important phenomena and plant features that control and/or dominate debris transport and the relative importance of each phenomenon as a function of the debris size. Further, these analyses were to demonstrate calculational methodologies that can be applied to plant-specific debris transport estimates. It should be noted that the DDTS focused almost entirely on the transport of LDFG insulation debris. The debris-transport processes studied included the processes involved in the transport of debris during the reactor blowdown phase by way of entrainment in steam/gas flows, during the post-blowdown phase by water flowing out of the break and/or containment sprays, and in the pool of water that would form on the drywell floor. The overall study and the airborne and washdown debris-transport processes were discussed in Section 4.3.3.2 of this report. The drywell floor pool aspects are discussed here.

Substantial quantities of insulation debris could land on the drywell floor during the primary system depressurization or be washed down to the drywell floor from drywell structures after being captured during depressurization. From here, the debris could then be transported from the floor into the vent downcomers. Therefore, determining the potential for debris to remain captured on the floor was a necessary step in the overall debris transport study. This determination was made based on simulating the drywell floor pool for a variety of conditions using a commercially available CFD code.<sup>5-20</sup> The primary objective of this analysis was to evaluate the potential for fibrous debris to settle in drywell pools and to estimate fractions of debris that would be transported to the suppression pool.

The study considered Mark I, II, and III designs for variations in pool depth and entrance conditions to the pools.

The CFD results needed to be benchmarked to prototypical experimental data to correlate pool turbulence levels with conditions that allowed debris to settle. This was accomplished by simulating the ARL PP&L flume tests<sup>5-7</sup> with the CFD code and then correlating the code-predicted turbulence level for a given test with the test results showing whether fibrous debris actually settled in that test. The maximum levels of turbulence that allowed debris to settle were determined and applied to the drywell floor pool simulation results. Two maximum levels were determined, one for small debris and one for large debris.

The results of each of the drywell floor pool simulations consisted of graphical pictures (available in the reference<sup>5-20</sup>) showing pool flow behavior, such as two- and three-dimensional color pictures of flow velocities and flow turbulence in the form of specific kinetic energy. These turbulence levels then were compared with the maximum levels for debris settling determined by the code calibration. If pool turbulence were higher than a maximum level, debris likely would not settle. On the basis of this graphical data, engineering judgment was applied to determine the likelihood for debris settling for each pool configuration. With noted design-specific exceptions, drywell floor pools formed by recirculation break flows are considered likely to transport the majority of insulation debris into the vent downcomers and pools formed by the containment sprays are likely to retain debris.

The BWR pool debris-transport methodology also is generally applicable to specific aspects of PWR sump pools because the debris transport in the BWR drywell floor has similarities to debris transport in a PWR sump pool. However, the drywell floor pools studied in the DDTS and the PWR sump pools have differences that would affect debris transport. In the DDTS, the potential for debris transport tended to be either the debris transported or it did not. When the break flow plummeted into the drywell floor pool at full throttle, the resulting turbulence levels were clearly high enough that, from a conservative standpoint, all of the debris would remain sufficiently suspended to transport into the downcomer vents. When the break flows were throttled back so that water flows to the drywell floor pool came mostly from the containment sprays, pool turbulence was low enough that it appeared that most of the debris

would settle and hence not transport with the overflow into the vent downcomers. Because the overflow was not at the floor level, floor debris transport was not as important because no mechanism was identified to reentrain the debris near the vents.

In a PWR sump pool, the pool turbulence level would be expected to be much less uniform because of the geometry of the sump. With the break located inside an interior compartment (e.g., steam generator compartment), most of the pool turbulence could be contained within the compartment, leaving the bulk of the sump annulus rather quiescent. If the break were in the annulus, then more of the annulus would be highly turbulent but not the inner compartments. In a PWR sump pool, the evaluation of pool turbulence will be much more plant- and accident-specific.

### 5.3.3 Boiling-Water Reactor Suppression-Pool Debris-Transport Analysis

In September 1993, the NRC initiated a detailed reference-plant study using a BWR/4 reactor with a Mark I containment.<sup>5-9</sup> The reference plant was a Mark I design with a relatively small suppression pool, leading to comparatively faster strainer flow velocities than other BWR plants. In addition, more than 99% of the primary system piping was insulated with steel-jacketed fiberglass insulation. The primary objective of the study was to determine the likelihood that a postulated break in the primary system piping of the reference BWR plant could result in the blockage of an ECCS strainer and the loss of pump NPSH. The analyses involved both deterministic and probabilistic techniques. The deterministic analyses focused on models to simulate phenomena governing debris generation, drywell and wetwell debris transport, and strainer head loss. The probabilistic analyses focused on evaluating the likelihood of core damage related to strainer blockage based on LLOCA-initiators. The BLOCKAGE computer program<sup>5-21,5-22</sup> was developed to calculate debris generation, debris transport, fiber/particulate debris-bed head losses, and impact on the available NPSH. The suppression pool debris transport analysis of that study is discussed here.

A model was developed to estimate the quantity of insulation debris, after it is in the suppression pool that would transport to an ECCS suction strainer. In addition, the suppression-pool model addressed the transport of sludge particles within the pool to a strainer. The transport of debris within the suppression pool to the ECCS suction strainers is

complicated by a variety of effects. Models for these effects were broken into two main phases with an interim transition phase. During the blowdown phase, pool dynamics would be governed by the extremely dynamic primary system depressurization. The LOCA-induced pool turbulence, such as condensation oscillations and chugging within the downcomers, would re-suspend debris initially settled to the pool floor (i.e., sludge), uniformly distribute the debris throughout the suppression pool, and further break up pieces of debris. During the relatively quiescent washdown phase, gravitational settling would be important as debris could settle to the suppression pool floor once again. Analytical models were developed that were based on and benchmarked to the experimental data collected for strainer head losses and suppression-pool sedimentation. These time-dependent models were programmed into the BLOCKAGE code, which was used to predict debris quantities that would accumulate on the strainers by type and size.

The BLOCKAGE code (Version 2.5) included models for transient debris bed formation and used the fiber/particulate head loss correlation (known as the NUREG/CR-6224 head loss correlation) developed in the reference plant study. The correlation was validated for laminar, transient, and turbulent flow regimes through mixed beds. BLOCKAGE is an integrated calculational method with a graphical user interface (GUI) for evaluating the potential for loss of ECCS pump net positive suction head margin as a result of insulation and non-insulation debris buildup on suction strainers following a postulated LOCA in BWRs. BLOCKAGE incorporates the results of multi-year NRC-sponsored research documented in NUREG/CR-6224. It also provides a framework into which users can input plant-specific/insulation-specific information for performing analysis in accordance with Revision 2 of Regulatory Guide 1.82.

BLOCKAGE 2.5 allows the user to simulate debris generation and subsequent transport of multiple types of debris, including fibers, particles, and metals, using either a three-zone destruction model or a user-specified quantity of debris for transport. The debris transport from the drywell to the wetwell can be location- and time-dependent. The transport during the blowdown period caused by depressurization flows is treated separately from the transport during the washdown phase, which is a result of ECCS recirculation, containment spray, and steam condensate flows. Two sizes of pipe-

break scenarios are considered: large and medium LOCAs. The debris transport within the suppression pool, including the deposition of debris on the strainers and the debris concentration within the pool, is calculated separately for each discrete debris size and debris type. The suppression pool is treated as a single volume of water. Specifically, debris concentration does not vary with location in the pool. The user supplies several model parameters that are time-dependent: the calculational time step, the pump flow rates, the drywell debris-transport rates, the suppression pool temperature, and the suppression pool resuspension and settling rates. The BLOCKAGE code was subjected to rigorous coding verification to ensure that it performs as it was designed to perform. BLOCKAGE was validated against applicable experiments.

At the time that the BLOCKAGE code was developed, the approach velocities to existing plants' strainers were relatively uniform even with the accumulation of debris. Hence, code models were based on the assumptions of uniform approach velocity, uniform debris deposition, and constant surface area. More complex strainer designs were developed as part of the resolution of the strainer-clogging issue, such as the stacked-disk and star-shaped designs. Debris deposition on strainers of these designs starts as a uniform deposition on the entire screen area, but eventually, debris shifts to fill the inner screen regions, creating substantially nonuniform approach velocities and debris deposition. After the inner spaces are filled, approach velocities and deposition again approach uniformity. Hence, the BLOCKAGE code is appropriate to calculate head loss with small quantities of debris on the strainer (uniform deposition) and again when there are substantial quantities of debris on the strainer (gaps filled with debris) but not with quantities between.<sup>5</sup> With small quantities of debris on the strainer, the entire strainer screen area would be used. With large quantities of debris, the circumscribed area would be appropriate. BLOCKAGE could be modified with a variable area that is a function of debris volume so that complex strainers could be modeled through the full range of debris deposition.

A typical suppression-pool transport analysis result is shown in Figure 5-22.

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<sup>5</sup>The quantities of debris involved depend on the size and design of the suction strainer.

#### 5.3.4 Pressurized-Water Reactor Volunteer Plant Pool Debris Transport Analysis

A volunteer PWR plant was chosen for detailed analysis with the primary objective of developing and demonstrating an effective methodology for estimating containment debris transport that could be used to assess the debris transport within PWR plants. This work is ongoing and is thus not available for this report. (The preliminary methodology of the airborne and washdown debris-transport analysis was discussed in Section 4.3.3.3.) Once completed, it is expected that the report for this study will further demonstrate analytical methodology for estimating debris transport within a sump pool.

#### 5.3.5 Nuclear Regulatory Commission Review of Licensee Experimental Approach to Sump Blockage Potential

The Millstone Nuclear Power Station, Unit 2, (Millstone-2) licensee conducted experiments to investigate the vulnerability of the station's emergency recirculation sump to blockage by debris resulting from a LOCA.<sup>5,23</sup> The experiments employed a sub-scaled representation of the Millstone-2 containment floor. The test report describing the experiments was submitted to the NRC for review and comment. LANL assisted NRC in its review.

##### **Objectives**

The objective of the Millstone-2 licensee's experiments was to determine whether the emergency recirculation sump of the Millstone-2 containment is susceptible to blockage by insulation and other debris that might be generated in a LOCA.

The objective of the review performed by NRC was to provide the industry with feedback regarding the validity of such experiments in resolving GSI-191 concerns on a plant-specific basis.

##### **Methodology** Licensee Experiments

The debris-transport experiments employed a downsized representation of the Millstone-2 containment floor and sump complete with a sample sump screen and a physically representative curb. Figure 5-23 shows the experimental configuration. The experiments were conducted in a walled-off sector of a 1300-gal. cylindrical tank.

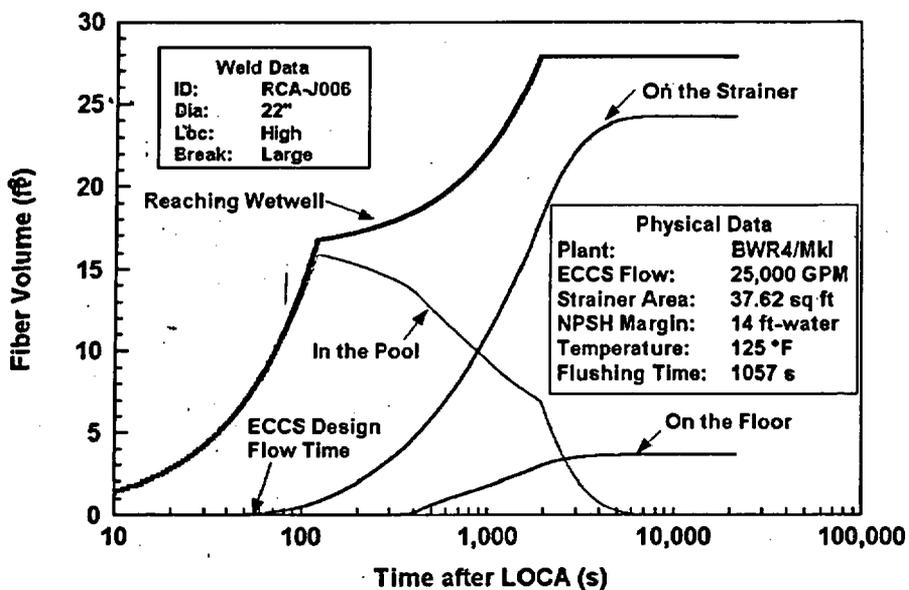


Figure 5-22 Typical Fibrous Debris Transport in the Suppression Pool

Millstone-2 Tank Test

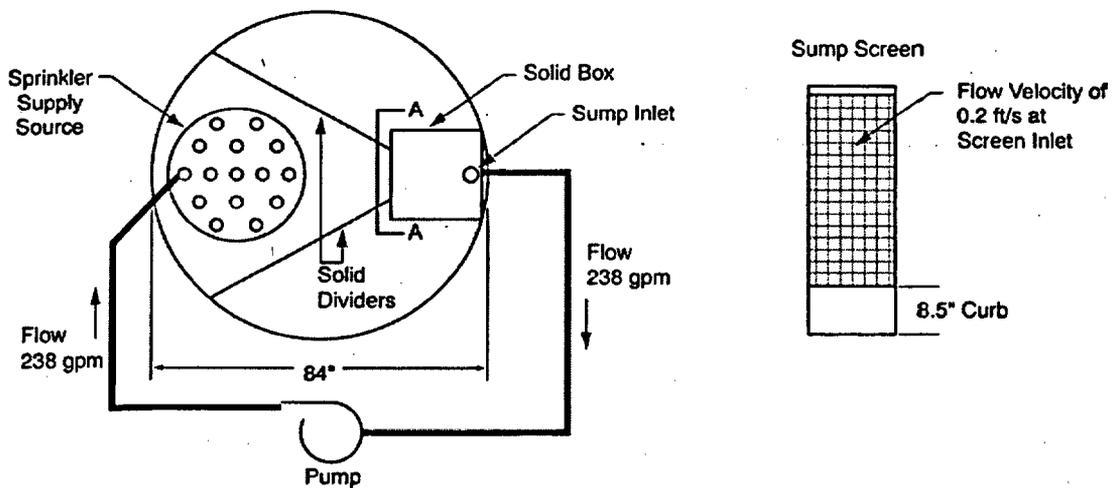


Figure 5-23 Configuration of Millstone-2 Debris-Transport Experiment

A box open to flow on one side and covered with screen on that side represented the sump. The screen area was 2.64 ft<sup>2</sup>, and an 8.75-in. curb was placed in front of the screen. Water was circulated through a closed loop in the experiments. Suction was from the bottom of the sump box. Return flow was through a diffuser above the water surface such that the water fell into the tank. Flow rates were such that the flow velocity at the sump screen, assuming a uniform velocity over the whole screen, was between 0.2 and 0.25 ft/s. This compares favorably to the 0.2 ft/s at the actual Millstone-2 sump screen.

The tank was filled with water to a 55-in. height, and measured quantities of debris were added uniformly across the test sector of the tank. The debris was allowed to sink to the floor. The desired flow (~236 gpm) then was established, and the transport of the debris and its accumulation on the screen were observed. Paint chips (zinc and epoxy), LDFG shreds, and RMI fragments were investigated.

#### NRC Review

The NRC review of the licensee experiments focused on determining whether the water flows developed in the tests could be considered representative of what would exist on the floor of the Millstone-2 containment following a LOCA. CFD simulations of the experiments and of postulated pools on the Millstone-2 containment floor were used.

A CFD model of the licensee's experimental configuration was constructed. The flow rates explored in the experiments were established in the model. The velocities predicted near the floor of the tank were considered relative to the known transport velocity of the debris being tested and determinations were made as to the potential for debris transport. The transport determinations were compared with the transport observations made in the experiments.

A CFD model of the lower region of the Millstone-2 containment also was constructed. A break in the cold-leg piping 15 ft from the sump and 20 ft above the floor was represented. This reflects the position of the reactor coolant system piping nearest the sump. A recirculation flow rate characteristic of full ECCS design flow given a large LOCA was specified (10,480 gpm) and a characteristic pool depth of 55 in. was imposed. The flow velocities developed in the CFD calculation in the vicinity of the sump were considered with respect to their potential to transport debris. The inferred transport

potential was compared with the debris transport observed in the licensee experiments.

#### **Results**

##### Licensee Experiments

The experiments conducted by the licensee saw no debris transport. The conclusion was drawn that no potential exists for debris generated in a LOCA to block the emergency recirculation sump in the Millstone-2 containment.

##### NRC CFD Modeling of Licensee Experiments

The CFD simulation of the licensee's experiment showed that no transport of debris would occur in the experiment. This agrees with the licensee's findings in the experiments.

##### NRC CFD Modeling of Millstone-2 Lower Containment Pool

The CFD simulation of the pool that would develop on the floor of the Millstone-2 containment following a LOCA where the pipe break was near the sump, identified a large potential for debris transport to the sump. This contrasts with the conclusion drawn by the licensee from the results of their experiments that no potential for debris transport exists. The reason for this discrepancy is the way water was returned to the pool in the experiment versus the way water was returned to the pool in the CFD calculation. In the licensee's experiment, returning water passed through a fixture that sprayed the water over much of the surface of the test sector of the pool. The momentum of the spray streams was such that the spray streams penetrated only slightly into the pool. In the CFD calculation, returning water fell into the pool as a collected stream uninterrupted from a height of 20 ft. The momentum of the falling stream in the CFD calculation was such that the stream penetrated well into the pool. The effects of the CFD stream's greater penetration were larger velocities at the bottom of the pool and more mixing (higher turbulence) in the pool. Both of these effects aid debris transport.

#### **Conclusions**

The conclusion drawn by the NRC reviewers was that the experimental investigations performed by the licensee into the potential for debris transport to the emergency sump following a LOCA led to invalid conclusions. The reason for this was a problem of similitude. Specifically, the momentum that would carry into the containment pool with the water stream falling from an elevated pipe break (near in plan to the sump) was not accounted for in the experiments. Without this momentum accounted for, the velocity fields developed in the

experiments were not representative of what would develop in a pool on the containment floor of Millstone-2.

Presumably, the experiment could be modified to have the returning water plummet into the test sector of the pool, as it would fall into an actual Millstone-2 containment pool. Although there may be additional similitude (scaling) issues, debris-transport observations made with water entering the pool realistically would be credible.

The issue of continuously suspended debris (e.g., individual fibers) was apparently not addressed by the Millstone-2 licensee. When a break jet destroys LDFG insulation, some portion of the debris, perhaps a few percent of the ZOI insulation, would be in the form of fine fibers that would remain suspended in the sump pool. Virtually all of this debris would transport and accumulate on the sump screen. The tests should have used more realistic simulated debris (may be unnecessarily critical of licensee).

#### **5.3.6 Computational Fluid Dynamic Simulations of UNM Integrated Debris-Transport Testing**

The integrated debris transport experiments discussed in Section 5.2.6<sup>5-3</sup> were complemented by computational fluid dynamic (CFD) calculations to demonstrate the ability of a CFD computer code to predict the complex flow patterns of the tests and to help visualize those flow patterns. CFD computer codes may well be used to support analyses of debris transport in PWR sump pools. The inherent difficulties associated with modeling a containment pool in any flow analyses are

- the complex three-dimensional non-uniform patterns of the flow with the sump pool;
- the complications associated with free-surface effects;
- the difficulties in resolving the momentum dissipation of the falling water stream(s) entering the pool, i.e., the localized circulative flows and related turbulence developed in the pool by falling streams;
- the complex influence of walls, curbs, etc.;
- the potentially complex influence of substantial quantities of larger debris within the pool, perhaps partially blocking flow channels;
- the directional influences of the flow being drawn from the pool through the sump; and
- the time variance of flow patterns.

The CFD simulations of the integrated debris-transport tests were performed using the FLOW-3D computer code. FLOW-3D<sup>5-24</sup> is a general-purpose software package for modeling the dynamic behavior of liquids and gases influenced by a wide variety of physical processes. The program was constructed for the treatment of time-dependent, multidimensional problems. FLOW-3D is applicable to almost any flow process.

The FLOW-3D model simulated the geometry of the test tank, including the internal wall structure, by scaling down the dimensions of the internal structures of a PWR plant layout provided in an AutoCAD drawing. (The test tank was one-tenth the size of the PWR containment.) The water was introduced into each simulation at a location that corresponded to the configuration of the test and at the mass flow rate specified for that test. The recirculation-cooling sump was simulated by a depression in the floor where water was removed from the simulation at the same rate as water was introduced. A variety of test configurations and flow rates was simulated.

The velocity pattern from a simulation is shown in Figure 5-24. As indicated by the right side of the figure bar, the velocities range from zero to 0.2 ft/s (0.06 m/s) and are indicated by shading; white indicates near-zero flow and black indicates near 0.2-ft/s or faster flow. (In the reference document, the flow patterns were in color and are easier to visualize.) The internal structures are indicated in the figure. The solid arrows indicate the general direction of flow. The water was introduced into one of the interior compartments that represented a steam generator enclosure (indicated by the circle). The simulated recirculation sump was located near the bottom of the diagram.

The CFD computer code simulations were compared qualitatively with experimental measurements of flow velocities and general observations of the pool flow patterns. The comparison clearly indicated that the simulation captured the significant features of the pool flow and the predicted flow velocities were comparable with the measured velocities.

#### **5.4 Summary of Approaches to Modeling Containment Pool Transport**

Two approaches to modeling the transport of debris in a containment pool are found in the literature. One is experimental in nature; the other is computational.

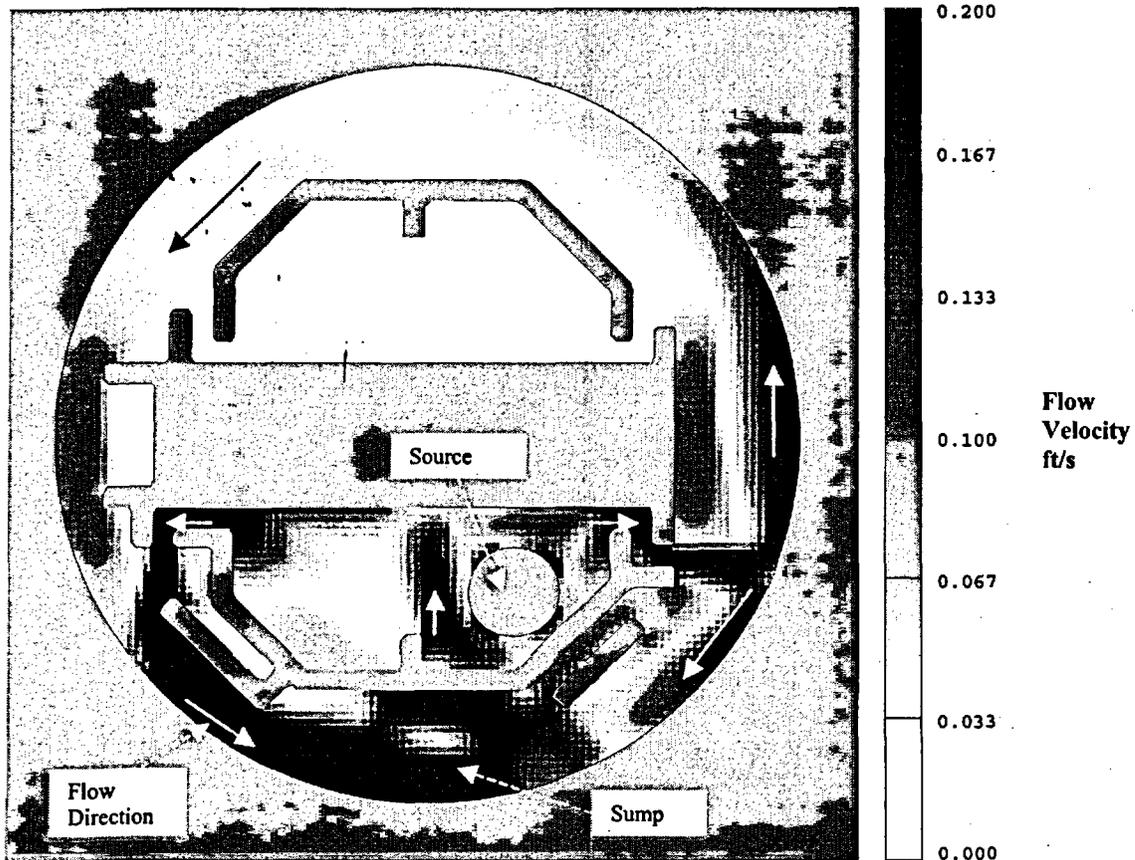


Figure 5-24 Sample CFD Prediction of Flow Velocities for One Test Configuration

The experimental approach to modeling debris transport in a particular containment sump pool involves building a scaled representation of the floor of the containment, complete with all the walls, curbs, equipment, etc. that would determine the flow patterns in the pool. Defendable similitude between the physical containment and the model must exist here; however, a defendable similitude would be difficult to develop. The rationale for scaling the water flow differs substantially from the rationale for scaling debris transport, but both processes must be scaled simultaneously. Appropriate inertial-force scaling, which governs water flow, requires that flow velocities be reduced with the square root of the length scale. Appropriate viscous force scaling, which governs debris transport, requires that flow velocities be increased proportional to the length scale. It may be that water-flow and debris-transport characteristics cannot be satisfied simultaneously in a scaled experiment. Although illustrative experiments of containment pool modeling are

documented, no defendable scale modeling of debris-transport potential in a specific containment has been accomplished to date. Critical testing considerations include recirculation flow rate, debris size, the height of the pipe break above the floor, the preparation of the debris (size distribution and pretreatment to remove trapped air), and introduction of the debris into the test. The potential for debris disintegration within the pool must be investigated.

The computational approach to modeling debris transport in a containment pool involves performing CFD calculations. Although commercially available CFD codes are clearly suited to predicting the flow patterns and velocity fields that would exist in a containment pool, the codes lack the ability to directly predict the transport of the various types of insulation and other debris that are present. This is because CFD codes do not have the capacity to resolve or account for the intricate transport characteristics of the different types, shapes, and

sizes of potential debris. As such, the flow-field predictions from a CFD containment pool calculation (e.g., velocities and turbulence levels) must be compared with experimentally determined debris transport characteristics to infer whether transport would occur. Illustrative CFD calculations of containment pool debris transport have been documented, but as with experimental containment pool modeling, no defensible complete CFD analysis of debris-transport potential in a specific containment has been accomplished to date.

Predicting the transport of insulation debris is a very complex process, perhaps too complex to generalize in any simple model. In addition, each plant has plant-specific features that would affect the transport of debris, and the transport process will necessarily vary with such parameters as the location of the break. Ideally, incorporating models for the various transport processes into CFD code might one day allow a code to perform the complete simulation. Such a CFD simulation then could take into account all the plant-specific aspects associated with debris transport. However, such computational capability does not yet exist. Meanwhile, the transport fractions measured in the integrated tests should provide some insights into plausible transport fractions for an actual plant. In addition, these tests, particularly the long-term LDFG transport tests, can serve as a potential means of benchmarking models developed to estimate debris transport.

## 5.5 Guidance

Certain accident specifics, plant features, debris characteristics, and physical phenomena are clearly important to consider in any analysis aimed at determining the potential for debris transport in a PWR containment pool. Based on the insights gained primarily from the integrated tests, the following guidance should prove helpful when developing a suitable plant- and accident-specific debris-transport model.

- Identify the accident scenario, including location, size, and possibly orientation of the pipe break and how water spilling from it would make its way to the containment floor. Determine whether the containment sprays would activate.
- Identify and conservatively estimate the sources of debris to the pool. This includes the type of debris (insulation or other type) and the size distribution of each type; when and where the debris enters the pool; and the transport

characteristics of the debris such as buoyancy, terminal settling velocity, tumbling, lift, and accumulation velocities.

- Evaluate the relocation of debris on the floor as the sump pool fills, specifically where the break overflow will push the debris initially deposited onto the floor. As the pool fills, most of the debris, if not all, will saturate relatively rapidly in hot water and sink to the floor, with the exception of the truly buoyant debris (e.g., Neoprene and some foam insulations) and the fine debris in suspension. A few pieces of debris may trap air and float for a while, but this is likely a smaller part of the total.
- Characterize the containment pool—determine the depth, flow patterns, flow velocities, turbulence levels, and locations of any quiescent regions in the pool after the directed flows associated with recirculation through the emergency sump develop. Also consider the effect that substantial debris, particularly larger pieces, could have on the sump pool characteristics (e.g., flow channel blockage).
- Specifically account for quantities of fine debris that would remain suspended in the pool long term even under relatively quiescent conditions. Such debris would include individual fibers<sup>6</sup> (or small bunches of fibers) and particulate debris such as disintegrated calcium silicate. All amounts of these types of debris probably should be considered as directly transportable to the sump screens.
- Account for the quantities of fine debris generated by degradation of the larger pieces of debris by the pool turbulence associated with water plummeting into the pool. This must consider the location of the debris sources relative to the location of the plummeting water.
- Based on the characteristics of the containment and estimates of debris and the characteristics of that debris, conservatively estimate the quantities of debris likely to be entrapped in specific locations identified such as isolated compartments, offset from the main flow, the centers of vortices, and behind obstacles. This applies predominantly to sunken and floor transportable debris.

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<sup>6</sup>As a point of reference, 15% to 25% of the LDFG insulation blankets destroyed in the air impact testing conducted at the Colorado Engineering Experiment Station (CEESI) was fine debris, i.e., debris so fine it either passed through a fine-debris retention screen or could be collected only by hosing down the interior test chamber walls.<sup>5-25</sup>

- If the sump screen is not completely submerged in the pool, account for whether significant buoyant debris could float to the screen and contribute to screen head loss.

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## 6.0 DEBRIS ACCUMULATION

This section describes the potential accumulation of debris at critical locations within a PWR containment, where that debris accumulation could adversely affect the recirculation sump performance. It specifically describes what is currently known about how parameters such as insulation type and debris affect the spatial distribution that debris fragments assume on the surface of the screen. This information is gathered primarily from experimental observations of debris accumulation on simulated PWR sump screens.<sup>1</sup>

LOCA-generated debris will have an adverse effect on recirculation sump performance if it either (a) covers the sump screen in sufficient quantity and over a sufficient surface area to impede flow or, (b) accumulates at a critical location for the flow of recirculation water along the containment floor such that the debris bed diverts water away from the sump.<sup>2</sup> In either case, debris first must be transported to a location of concern; debris transport processes are described in Sections 4 and 5 and are not discussed further here. However, after debris is transported to a location of concern, it must accumulate in sufficient quantity and in a configuration that impedes flow. The current knowledge on debris accumulation is summarized in this section.

### 6.1 Locations of Concern

The principal location of concern for debris accumulation is the surface of a recirculation sump screen. The physical configuration of the sump screen as well as its position and orientation in the pool of water that it services vary considerably among the U.S. PWRs. The features of sump-screen design and installation

that influence debris accumulation are summarized in Section 6.1.1.

Additional locations of concern are those in which the flow path for recirculating water passes through a narrow passageway or restriction in cross-sectional area. If debris were to accumulate at these locations (perhaps because of the presence of a trash rack or similar feature), water might be diverted away from the sump, thereby reducing the sump water level and associated hydraulic head. Examples of such locations are given in Section 6.1.2.

#### 6.1.1 Sump Screens

Historically, the sump screen has been the principal location of concern for debris accumulation. For fully submerged screens, excessive accumulation of debris can cause the head loss across the debris bed to reduce the available NPSH to ECCS or containment spray pumps. For partially submerged screens, excessive debris accumulation can reduce the static head necessary to drive recirculation flow through the screen. Debris accumulation and head loss at this location are the primary focus of research supporting the resolution of USI A-43 and GSI-191.

Information regarding the configuration of containment recirculation sumps in U.S. PWRs was gathered by NEI and the U.S. NRC through initiatives supporting GSI-191 and GL-97-04, respectively. This information was reviewed by LANL to ascertain the type and range of design features that might affect debris accumulation and other factors that influence sump performance.<sup>6-1</sup> The results of this review clearly show that PWR sump designs span a wide range of geometries from horizontal screens below the floor elevation to vertical screens attached to elevated pedestals. Examples of various recirculation sump designs in U.S. PWRs are shown in Figure 6-1.

- Screen surface area: Values range from 11 ft<sup>2</sup> to 700 ft<sup>2</sup>.
- Screen mesh size: A majority of plants have a sump-screen mesh size of 0.125 in. However, roughly 40% of U.S. PWRs have a screen mesh size larger than 0.125 in.

<sup>1</sup> Much of the debris accumulation data were obtained while conducting tests specifically designed to test either debris transport in water or to measure debris head loss across a screen or strainer.

<sup>2</sup> The knowledge associated with debris accumulation also applies to screens in the upper containment levels (e.g., fueling pool drain screens), but the potential blockage of such screens usually is treated as part of debris transport from the upper levels down to the sump pool (see Section 4).

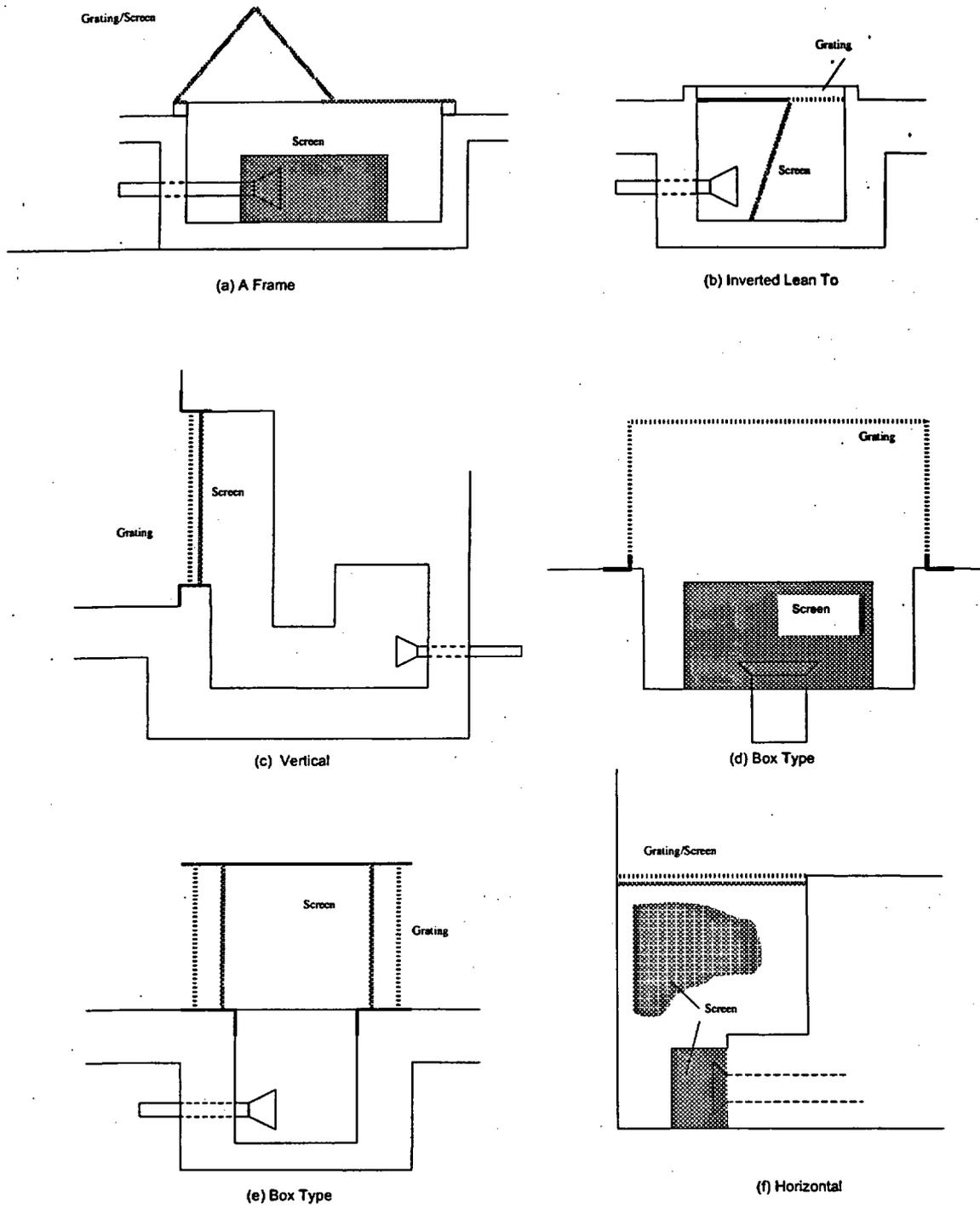


Figure 6-1 Examples of Various Recirculation Sump Configurations in PWRs

- Obstacles to water flow and/or debris transport:
  - Some plants employ curb-like features that would inhibit heavy debris from reaching the screen; many do not have a curb or any impediment to flow.
  - Most plants have trash racks in front of the screen to prevent large debris from reaching the screen.
- Level of submergence: For approximately 1/3 of the U.S. PWRs, the sump screens would not be submerged completely at the time that ECCS recirculation starts. Further, the sump screen for about 1/2 of these PWRs would not be submerged completely even at the maximum pool height.

### 6.1.2 Containment Flow Restrictions

The location of the sump in a PWR containment can vary considerably from one plant to another. Further, the path along the containment floor that water must travel to reach the containment sump can vary, depending on the location of a postulated break. These two variables lead to the possibility of flow restrictions at locations distant from the sump where debris might accumulate and interfere with the distribution of water on the containment floor.

A simple example of such a configuration is shown in Figure 6-2. In this example, the accumulation of debris on trash racks that are mounted on openings between the main portion of the containment and an isolated room in which the sump is located would restrict flow to the sump. One effect of this flow restriction could be to lower the water level at the sump, thereby depriving the sump of an adequate recirculation suction volume or possibly reducing available NPSH. Other plant design features that could produce a similar effect are

- screen doors at the entrance to high-radiation areas,
- small-diameter "drainage" holes drilled through interior walls (e.g., crane wall), and
- narrow gaps between concrete foundation pads for heavy equipment and neighboring walls.

### 6.2 Accumulation Patterns

The geometric configuration of a debris bed formed at a location of concern strongly influences the extent to which it affects flow. In this context, the term "geometric configuration"

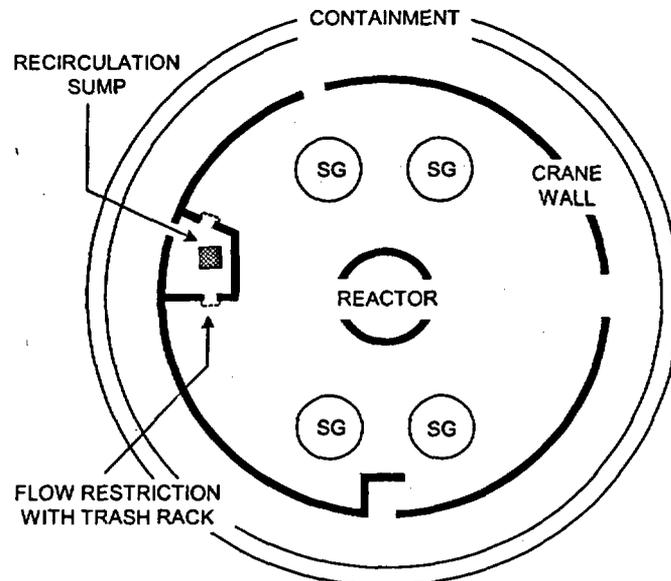


Figure 6-2 Example of a Containment Floor Flow Restriction that Might Result in Diversion of Flow From the Recirculation Sump

is meant to include qualitative and quantitative features of the bed, such as

- the fraction of surface area (sump screen) or cross-sectional area (flow restriction) covered by debris,
- the extent to which the debris bed is uniform in depth (perpendicular to the flow direction),
- the height of the debris bed off the floor (for vertical screens), and
- the porosity of debris material(s)

Variations in these features result in different accumulation patterns or debris bed profiles, which in turn affect water flow and/or head loss.

Qualitative insights were obtained from a number of experiments conducted with prototypic BWR recirculation suction strainers (both simple truncated-cone designs and the complex advanced designs) and, to some extent, experiments involving vertical PWR sump screens. The accumulation patterns depended strongly on the orientation of the screening surfaces, the flow conditions, and the type and size of the debris, specifically whether the debris was suspended or transported along the floor to the screen.

The data for a horizontally oriented PWR sump screen are very limited; these data include the horizontal screens in the integrated debris-transport tests (Section 5.2.6), the flat-plate screens in the closed-loop head loss tests, and certain horizontal portions of the BWR strainer designs (for example, the flat portion of a vertically mounted, truncated-cone strainer). For finer debris, the accumulation patterns tend toward uniformity, similar to those of the vertical screens. For coarser debris transported along the sump floor, the accumulation of debris has not been completely observed; however, it should be more uniform for a horizontal screen than for a vertical screen, where gravitational forces keep larger debris nearer the bottom of the screen.

Debris accumulation profiles on vertical sump screens have been reported in several experimental studies as described in Section 6.4.2. Additional relevant data is also available from experiments involving BWR ECCS suction strainers as summarized in Section 6.4.1. Three conclusions can be drawn from this collective body of experiments.

- Fine debris<sup>3</sup> (e.g., shredded fiber, disintegrated calcium-silicate, and possibly small, crumpled fragments of RMI foil<sup>4</sup>) will arrive at the screen surface as a well-mixed suspension of material, and therefore deposit in a near-uniform pattern or will arrive at the screen by tumbling or rolling across the floor and then easily lift above the already deposited debris to spread across the screen.
- Moderate-sized pieces of debris<sup>5</sup> represent debris that accumulates somewhat like the fine debris and somewhat like the large debris.
- Large or heavy pieces of debris<sup>6</sup> will collect on a horizontal screen only if local water velocities are sufficient to transport the debris onto the screen surface. In the case of a horizontal screen mounted flush with the surface of the containment floor, this velocity is the same as that necessary to sustain lateral motion (as described in Section 5). For horizontal screens located above the floor elevation,<sup>7</sup> large debris may still deposit on the surface if local velocities exceed the values necessary to "lift" debris above the curb (if present) or pedestal supporting the screen. The values of water velocity needed to lift debris above 2- and 6-in. obstacles were measured in debris-transport tests conducted by the NRC, which are discussed in Section 5.2.5.<sup>6-2</sup>

<sup>3</sup> Fine debris includes debris so fine (e.g., individual fibers and particles) that it will remain in suspension at very low levels of turbulence, as well as debris that readily settles in hot water but also easily moves across the pool floor.

<sup>4</sup> Aluminum RMI foils are relatively lightweight and have waterborne transport properties similar to those of shredded fiber. Stainless-steel RMI foils are heavier and require higher levels of turbulence or higher water velocities than aluminum foils to remain suspended.

<sup>5</sup> When a fiber insulation is destroyed by a jet; for example, large pieces of relatively intact fibrous insulation are usually blown free of the blanket. Although they are irregular in shape, these pieces are frequently several inches to a side and can be represented suitably as a 4-in. square.

<sup>6</sup> Truly large debris could consist of insulation pillows, blankets, cassettes or large portions thereof, and miscellaneous items such as metal items.

<sup>7</sup> This conclusion also applies to screens located in a sump below the floor elevation if the level of turbulence within the sump is sufficient to lift debris above the base of the sump.

These profiles can be grouped broadly into four distinct classes as shown in Figure 6-3. After they are put in motion, very large pieces of insulation debris, such as intact fiber pillows or RMI cassettes, tend to "slide" along the floor until they contact the base of the screen. Fiber pillows or RMI cassettes tend to stay in these prone positions unless high screen-approach velocities develop [see part (a) of Figure 6-3]. With high screen-approach velocities, these large objects can "flip" onto the surface of the screen. If they flip, they can obstruct a significant fraction of the screen flow area, partially blocking a sump screen. The values of approach velocity required to flip a fiber pillow or RMI cassette are described in Section 6.4.2.

The accumulation profile typically observed with moderate-size fragments<sup>8</sup> of insulation material is shown in part (b) of Figures 6-3 and 6-4. This pattern has been observed when sections of fiber matting or RMI foil accumulate against a vertical screen. Debris of this size and weight requires relatively high water velocities to keep it suspended in the flow stream. Therefore, it often is observed to arrive at the sump screen near the floor elevation and "pile up" near the base of the screen. Again, at high approach velocities, these fragments can "flip" or roll up to higher elevations on the screen. The values of approach velocity required to lift moderate-size fragments are described in Section 6.4.2.

Smaller pieces of RMI foil (i.e., shrapnel approximately 1 to 2 in. across) form a more coherent debris bed against a vertical screen than larger foil fragments. Because RMI foils (crumpled or flat) tend to transport along the bottom of a body of moving water, the foils initially arrive at a vertical screen near its base. If the screen approach velocity is sufficiently high, small pieces of RMI foils can gradually "climb" the surface of the debris bed and cover a significant fraction of the screen surface. However, the accumulation pattern typically has a shape that is thicker at the bottom than at the top, as shown in part (c) of Figures 6-3 and 6-4. Data collected to date and summarized in Section 6.4.2 suggest that RMI foil fragments would not completely cover a submerged

vertical screen unless the total volume of material was relatively large—i.e., roughly the volume needed to fill a triangular cross-section perpendicular to the screen.

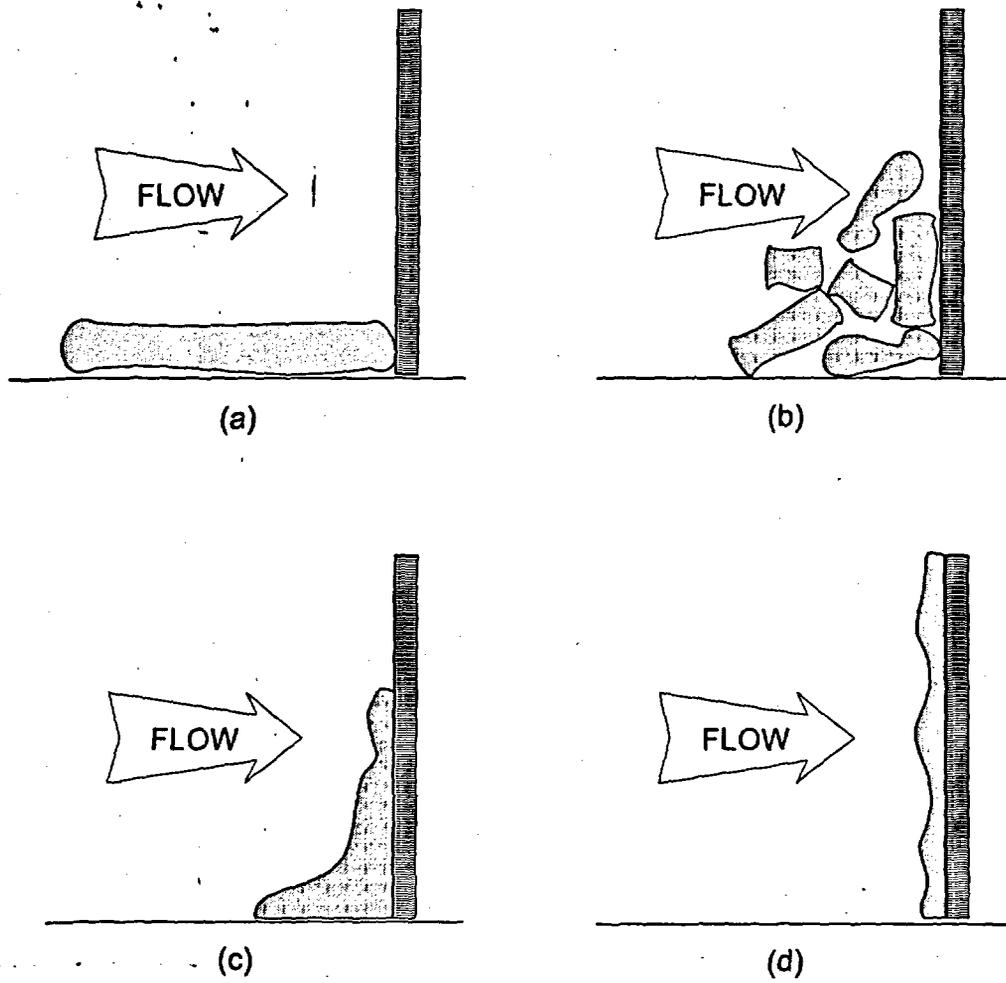
A general observation from experiments concerning fluid transport of fine shreds of fiber and disintegrated fragments of calcium-silicate is that after this type of debris is in motion upstream of the screen, it tends to stay suspended. This is particularly true in turbulent flow streams. As a result, this form of debris tends to arrive at the sump screen as a flux of suspended material that contacts the entire exposed surface of the screen. This leads to a relatively uniform accumulation profile as illustrated in part (d) of Figures 6-3 and 6-4. This accumulation pattern can vary slightly in situations where the screen is partially submerged in the pool of water. In such cases, fine debris has been observed to deposit more heavily near the bottom of the screen, creating a pattern that resembles a mixture of the bottom-skewed and the uniform patterns shown in parts (c) and (d) of Figures 6-3 and 6-4.

Another example of uniform debris accumulation is shown in Figure 6-5, where relatively fine debris accumulated uniformly across the lower, submerged portion of the vertical test screen during integrated debris-transport testing, which is discussed in Section 5.2.6.<sup>9</sup> A primary component of this debris accumulation was fibrous debris so fine that it remained suspended even at low levels of pool turbulence; therefore its arrival at the screen was extremely uniform.<sup>9</sup> Adding a small quantity of particulate to even a thin layer of such debris accumulation has been found to result in substantial head loss across the screen.

Experiments performed to determine the accumulation profiles that a particular debris type would attain for various flow conditions are described in Section 6.4.2.

<sup>8</sup> "Moderate size" is meant to represent sections of fiber matting roughly 4 in. x 4 in. x 1 in. in size or RMI foils roughly 4 in.<sup>2</sup> in area.

<sup>9</sup> In one such test, the resulting debris accumulation created such a significant head loss across the screen that the test was aborted. This debris accumulation subsequently was dried and removed from the screen. A small quantity of sand that had contaminated the test apparatus was mixed with the fibers. The dried layer debris was thin and had the relative texture of paper.



**Figure 6-3 Debris Accumulation Profiles Observed in Linear Flume Experiments**

[No photo available for intact pillow or cassette]



(a)

(b)



(c)



(d)

**Figure 6-4** Photographs of Debris Accumulation on a 1-ft x 1-ft Vertical Screen in a Large Linear Flume [Ref. 6.3] (The photo shown in each frame corresponds to accumulation pattern shown in the same frame of Figure 6-3.)

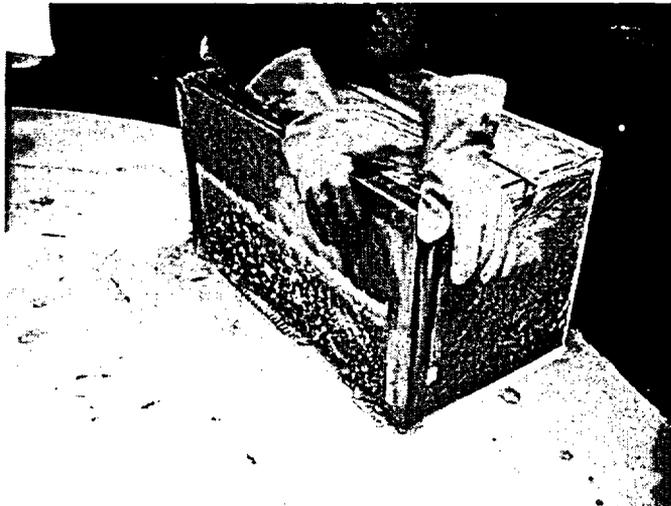


Figure 6-5 Typical Buildup of Fine Fibrous Debris that Easily Remains Suspended

### 6.3 Parameters Affecting Debris Accumulation

The manner in which LOCA-generated debris accumulates at locations of concern is influenced by several parameters—each of which can vary considerably among plants of otherwise “similar” design features. Values for some of these parameters also can depend on the specific accident sequence for which flow through the recirculation sump is required to mitigate the accident.

#### 6.3.1 Local Flow Field

The accumulation pattern that debris develops at a location of concern is influenced strongly by the characteristics of the local flow field (i.e., the level of turbulence and the flow velocity). Turbulence facilitates debris mixing into the flow stream and thereby promotes uniform deposition of material onto the surface of a debris screen, regardless of its orientation with respect to the bulk flow. In situations where the flow field is not turbulent, the screen approach velocity determines the hydraulic shear forces on the debris and therefore governs the extent to which individual debris fragments are distributed across the screen surface.

For horizontal screens, relatively small shear forces (i.e., low velocities) are needed to move debris across the surface of the screen. Small- and moderate-size debris fragments will move

laterally toward areas of low flow resistance (i.e., smaller bed thickness), thereby “self-adjusting” the debris bed and creating a near-uniform deposition profile.

The competition between gravitational and hydraulic shear forces can lead to nonuniform velocity profiles on vertical screens. Low velocity, combined with a high specific gravity of debris fragments, can cause debris to preferentially accumulate near the base of a vertical screen, leaving the upper portions of the screen relatively clean. However, at higher velocities, shear forces on debris can overcome gravitational sedimentation and “lift” or “flip” debris upward onto higher regions of the screen. The velocities needed to overcome the tendency for debris to settle at the bottom of a vertical screen have been determined experimentally as described in Section 6.4.2.

Changes in approach velocity with time also can affect debris accumulation. For geometric configurations in which persistent hydraulic forces are required to “hold” debris on a screen, a significant reduction in flow might allow debris to fall off the screen, changing the accumulation profile. This behavior has been observed in experimental simulations of debris accumulation on representative (vertical) sump screens when tests are terminated by turning off the pump that drives flow through a linear flume. The sharp reduction in flow typically causes the debris bed to expand. Subsequently, fragments of debris,

such as clumps of RMI foil or fibrous material, peel off the debris bed and fall to the floor in front of the screen. Some particulate material (if included in the debris mixture) is released from the bed and is resuspended in the flume water. If flow subsequently is increased to the initial rate by restarting the pump, a debris bed reforms, although not necessarily in a configuration similar to the one observed before the flow reduction. Detailed experimental studies of the effects of flow reduction on debris accumulation and retention on a vertical screen have not been performed. The comments above are based on qualitative observations made during debris transport and (initial) screen accumulation tests.

### 6.3.2. Local Geometry

Although large pieces of debris are not likely to be a significant concern for blockage for most PWR sump screens, accumulation of such debris at locations where recirculation water must pass through narrow passageways can initiate a sequence of events that diverts or impedes the flow of water to the sump. That is, accumulation of large debris at such locations provides a porous, but effective, medium for collecting smaller and smaller fragments of debris. This possibility is a potential concern at locations on the containment floor, for example, where the characteristic dimensions of openings in recirculation water flow area are comparable to (or smaller than) those of the largest debris constituents.

Local geometry also affects the performance of the recirculation sump screen. As indicated above, the orientation of a sump screen relative to the flow stream determines whether hydraulic shear forces beyond those needed to transport debris to the screen are required to distribute debris across the surface of the screen. Other geometric characteristics of a sump-screen design that are likely to influence the debris deposition pattern include

- the elevation of the screen relative to the containment floor (or base of the sump),
- the presence of a trash rack or other obstacle to remove large objects, and
- the screen surface area.

The specific effects of these characteristics on debris accumulation have not been studied experimentally.

The debris-capture efficiency of a screen is not strongly dependent on the size of the screen mesh over the narrow range of values typically found in U.S. PWRs.<sup>10</sup> Debris collection efficiency typically is not measured as part of screen-accumulation and head loss experiments. However, observations of debris accumulation on a 1/4-in.-square mesh have not identified noteworthy differences from accumulation on a 1/8-in. mesh.<sup>6-2,6-3,6-4,6-5,6-6</sup>

### 6.3.3 Submergence

Experiments designed to measure threshold velocities for incipient motion and bulk transport of debris in water (discussed in Section 5.2.5)<sup>6-2</sup> have shown that the results are not sensitive to the depth of water on the containment floor.<sup>11</sup> However, after debris arrives at the face of a vertical screen, the accumulation profile assumed by the debris is affected by the depth of the water.

Recent tests performed in the linear flume at UNM<sup>12</sup> suggest that the accumulation profiles on a partially submerged screen may differ from those on a totally submerged screen under otherwise identical conditions (i.e., debris type and flow patterns).<sup>6-3</sup> This difference was observed initially in experiments performed in a linear flume after an adjustment was made to the construction of a simulated (vertical) sump screen to eliminate a screen bypass flow path along the upper perimeter of the screen. During initial shake-out tests, water was observed to spill over the top of the screen through a narrow gap along the upper perimeter of the square screen, thereby allowing a fraction of the total flume flow to bypass the screen surface. Under

<sup>10</sup> There are a few exceptions where the mesh size is substantially larger. For these exceptionally large mesh sizes, there are essentially no data available regarding debris accumulation. Finer debris may essentially just pass through the screen.

<sup>11</sup> Experiments performed to date have all involved measurement of debris-transport properties for completely submerged debris. Similar statements currently cannot be made for very shallow pools of water where debris motion might be directly impacted by the free surface.

<sup>12</sup> The UNM experiments related to debris accumulation are ongoing at this writing; hence, only preliminary observations are included here. The UNM test report is expected to include a summary of the debris accumulation data from these tests.

these conditions, debris accumulation profiles against the screen tended to be skewed toward the bottom of the vertical screen. When this gap was sealed and all water was forced to pass through the screen to exit the flume, the accumulation profile for easily transportable forms of debris (e.g., small fiber fragments) became uniform. This observation led to the qualitative conclusion that the accumulation profile on a partially submerged screen might differ from that on a fully submerged screen. However, this conclusion could not be tested rigorously in the UNM flume because of the limitations in the vertical scaling of the flume cross section.

Other observations made from the UNM experiments are listed below.

- Debris that is readily suspended in the flow stream (i.e., small fiber or calcium-silicate fragments and particulate matter) is deposited uniformly across the exposed screen surface area when the screen is fully submerged. Hydraulic forces draw all suspended material to the screen, where it collects randomly. The deposition pattern self-corrects for asymmetries in the debris-bed depth when flow (and suspended debris) is diverted toward regions of lower flow resistance (i.e., blocked with less debris.)
- The accumulation pattern (below the surface of the pool and for the same debris material) on a partially submerged screen can appear to be slightly skewed toward the bottom of the screen. This pattern does not appear immediately but develops as debris accumulates in the following manner. Initially, suspended debris deposits on the face of the screen in a near-uniform pattern. The pressure drop across the screen caused by the thin debris bed is manifested as a difference (decrease) in water level across the screen. As debris accumulates on the screen, the axial velocity profile in front of the screen changes. The velocity of the water near the base of the screen decreases, and the velocity of the water near the pool surface increases. This shift in the axial velocity profile allows some debris to settle toward the base of the screen, thereby increasing the concentration of debris near the bottom the flume relative to the top of the flume. Slowly, the debris accumulation profile appears to grow more

heavily toward the base of the screen than toward the surface of the pool.

Similar experiments have not been performed for other forms of debris, such as RMI foils. However, as described in Section 6.4.2, such debris tends to accumulate in bottom-skewed profiles even on fully submerged screens.

#### 6.3.4 Debris Characteristics

From the discussion provided in Section 6.2, the type and size of debris that approaches a sump screen clearly affects its accumulation profile. The data described in Section 6.4 clearly indicate differences in the accumulation of fibrous, calcium-silicate, and RMI debris on vertical screens. In contrast, little difference in the accumulation pattern would be expected if these types of debris collected on a horizontal screen close to or below the elevation of the containment floor.

### 6.4 Test Data

Section 5 describes numerous experiments that have been performed to evaluate the hydrodynamic conditions required to move debris of various types from their position of arrival on the containment floor to the recirculation sump. Many of these experiments also provide valuable insights on debris accumulation on a sump screen. These insights and quantitative criteria for attaining the debris accumulation patterns described above are summarized in Section 6.4.2. However, before these experiments are discussed, it is instructive to review relevant information obtained from BWR strainer performance tests.

#### 6.4.1 BWR Strainer Tests

The BWROG and various ECCS recirculation suction strainer vendors performed numerous experiments to characterize the accumulation and head loss associated with LOCA-generated debris for replacement strainer designs thoroughly. Although the local flow conditions and strainer configurations differ considerably from a PWR recirculation sump screen, certain qualitative observations made from these experiments are worth noting.

A common BWR replacement strainer design is the "stacked-disk strainer." This design consists of a central perforated tube that is sealed at one

end and mated to a flange at the other end for mounting to an ECCS recirculation suction pipe stub in the suppression pool. A series of perforated disks is welded to the outer circumference of the perforated tube, greatly increasing the effective surface area of the strainer without increasing its overall size. An example stacked-disk strainer design is shown in Figure 6-6.

Experiments performed to characterize debris accumulation and associated head loss through stacked-disk strainers were performed by several vendors and BWR utilities. The results of these tests provide useful information on the manner in which debris accumulates on the convoluted surface of this type of strainer design. Figures 6-7 and 6-8 show sample test results for increasing quantities of fibrous and RMI debris, respectively.<sup>13</sup> The process of debris accumulation on a stacked-disk strainer is more complicated than that on a flat screen. In either case, the water flow always follows the path of least resistance. With a stacked-disk strainer, water flows through all of the screened surfaces and debris is deposited onto all of the screened surfaces, but the flow and deposition are skewed toward the screened surfaces of lesser resistance. Initially, the hydraulic resistance through a "clean" strainer is somewhat less along the surface of the central tube than along surface of the outer fins, resulting in somewhat more debris accumulation within the gaps between fins. As debris accumulates onto the disk-shaped surfaces inside the gaps, the flow moving somewhat parallel to these surfaces pushes the debris on these surface further into the gaps, thereby keeping a portion of the disk surface relatively clean of debris until the gaps are filled, as shown in the photographs on the left side of Figures 6-7 and 6-8. After the gaps are filled, the debris preferentially occurs on the disk rims until the accumulation becomes more circumferentially near uniform.

#### 6.4.2 Test Results for Vertical PWR Sump Screen Configurations

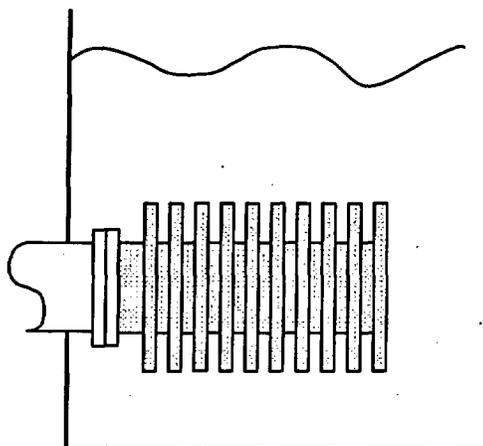
Experiments conducted in a linear flume at ARL in support of USI A-43 studied the buoyancy, transport, and head loss properties of insulation materials of various sizes and compositions

<sup>13</sup> Note: The strainers are installed in a vertical orientation in these photographs.

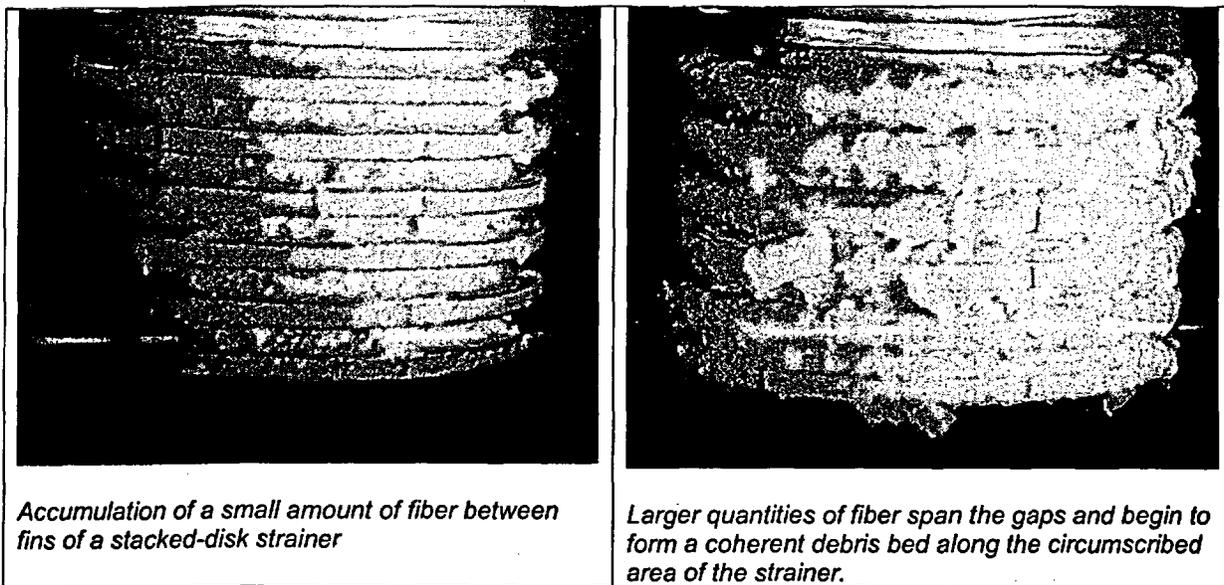
(discussed in Sections 5.2.1 and 5.2.4).<sup>6-5,6-6</sup> In addition to these properties, observations were recorded concerning the water velocity required for these materials to deposit on a vertical screen. The experiments were performed in a large linear flume; and the screen was manufactured with a metal mesh similar in size to that found on a typical PWR recirculation sump screen. The sizes of the insulation material spanned the full range from intact fiber pillows and RMI cassettes to small fragments of fiber and RMI foil.

The results of these experiments are summarized in the first two rows of Table 6-1. The results shown represent the velocity at which debris of a particular type and size would "flip up" or be lifted off the flume floor and adhere to the screen surface. For shredded fiber fragments, this velocity is relatively small (0.2 ft/s) and corresponds to the velocity required to induce incipient motion of the fragments in the flume. For larger pieces of debris, the lifting velocity was generally higher than that required to induce motion. For example, intact fiber pillows or RMI cassettes were observed to shuffle along the floor of the flume at velocities above approximately 1 ft/s. However, velocities approaching 2 ft/s were required to flip a pillow/cassette onto the screen surface. Investigators at Bremen Polytechnic in Germany observed similar results for intact insulation units manufactured by a different vendor, which are discussed in Section 5.2.7.<sup>6-7</sup>

The flow conditions required for debris to deposit on the upper portions of a vertical screen also can be inferred from measurements made of the velocity required to "lift" debris over a 2- or 6-in. curb. Such measurements were made in a large linear flume at UNM<sup>6-2</sup> as part of a debris-transport study (discussed in Section 5.2.5). The so-called "lifting" velocity for fiber fragments, moderate-size pieces of fiber matting, and RMI foils are listed in Table 6-1. The values of the lifting velocity are generally consistent with earlier measurements of the flip-up velocity. That is, debris can be lifted over a 6-in. curb (or be lifted onto a vertical screen) at relatively low velocities (i.e., less than 0.3 ft/s) if the flow field in the pool of water is turbulent. In laminar flow fields, the "lift" velocity increases only slightly for fiber fragments. Stainless-steel RMI debris was observed to remain near the base of the screen



**Figure 6-6 Example Installation of a BWR Stacked-Disk ECCS Recirculation Suction Strainer**



**Figure 6-7 Fibrous Debris Accumulation on a Stacked-Disk Strainer<sup>6-8</sup>**

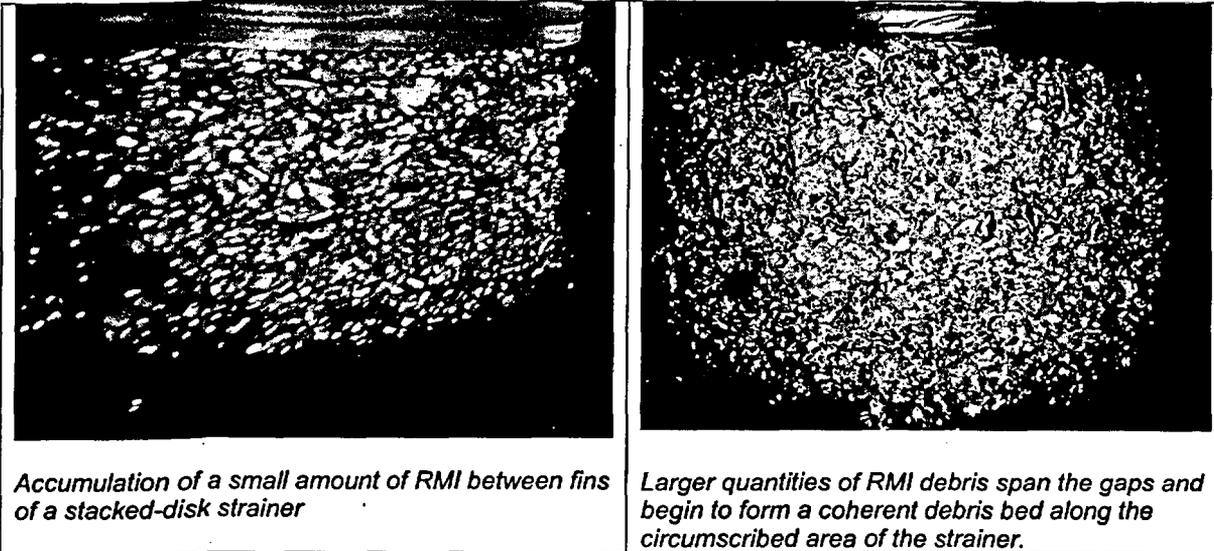


Figure 6-8 RMI Debris Accumulation on a Stacked-Disk Strainer<sup>6-8</sup>

Table 6-1 Minimum Screen Approach Velocity for Debris to "Flip Up" or be Hydraulically "Lifted" Onto a Sump Screen

DATA SOURCE	Velocity (ft/s)				
	Intact Fiber Pillows *	Fiber Fragments * #	Shredded Fiber *	Intact RMI Cassettes	SS RMI foils
U.S. NRC (1983) <sup>6-5</sup>	1.1-2.4	0.5-0.7 (turbulent)	0.2 (turbulent)	—	—
U.S. NRC (1984) <sup>6-6</sup>	—	—	—	> 1.0	1.8-2.0 **
Bremen Polytech. (1995) <sup>6-7</sup>	0.9-1.3	0.7-1.1 (laminar)	0.9-1.2 (laminar)	Tested by flipping on screen not observed	1.9 **
U.S. NRC (2001) <sup>6-2</sup>	—	0.30-0.47 (laminar) 0.25-0.39 (turbulent)	0.28-0.34 (laminar) 0.25-0.30 (turbulent)	—	No lift (laminar) 0.30 (turbulent)

\*Fibrous material varied among tests, but included fiberglass and mineral wool.

\*\*Although SS foil fragments were observed to "lift" and flip onto the vertical screen at these velocities, the debris mass remained primarily near the bottom of the screen. Brocard reports maximum flow blockage in such cases was 60-70% of the screen area.<sup>6-6</sup>

#Fragment size typically 4-in. x 4-in. pieces of fiber matting.

at velocities greater than 1 ft/s when the flow stream was laminar.

A significant limitation of the studies listed in Table 6-1 is that none of them involved a sufficiently large quantity of debris fragments to allow observations to be made regarding the accumulation pattern that would result at water velocities above the "lifting" threshold. Experiments underway at UNM are examining this topic.<sup>6-3</sup> These experiments examine debris bed patterns on a vertical screen for moderate- and small-size debris fragments of fiber, RMI foils, and calcium-silicate.

The preliminary results of the UNM tests generally confirm the use of data for debris lifting velocity to characterize the flow conditions needed to generate a uniform debris bed profile or (in the case of RMI foil), the bottom-skewed profile shown in part (c) of Figure 6-3. Three specific observations were made from these tests.

- Shredded fiber and disintegrated calcium-silicate developed a near-uniform debris bed at velocities exceeding approximately 0.5 ft/s<sup>14</sup> when the screen was fully submerged. The debris-bed pattern shifted toward the bottom-skewed shape when the screen was partially submerged.
- Crumpled stainless-steel RMI foils (~2 in. in size) accumulated in a bottom-skewed pattern at velocities less than 1 ft/s. Individual foils that arrive at the base of the screen "climbed" on top of foils that arrived earlier and gradually formed a debris bed that was triangular in cross-section.
- Very small particles of calcium-silicate and suspended fibers collected on the screen in a uniform pattern at velocities as low as 0.2 ft/s. A significant fraction of larger calcium-silicate debris (e.g., clumps of particulate and binding fiber) either settled to the floor of the flume before reaching the screen or collected as a mass near the base of the screen at velocities as high as 0.9 ft/s.

<sup>14</sup>This might not be the lower limit of velocity required to attain a uniform debris bed. Additional testing (underway) will evaluate accumulation patterns at lower velocities.

## 6.5 References

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## 7.0 DEBRIS HEAD LOSS

This chapter discusses information related to estimating the pressure drop (or head loss) across the ECCS strainer or sump screen as a result of debris build-up. This subject was previously addressed in a knowledge base report<sup>7-1</sup> published by the Committee on the Safety of Nuclear Installations (CSNI) specifically Section 4 of that report, entitled "Strainer Pressure Drop." This report summarizes the head loss data and technical developments achieved since that report was published in conjunction with key aspects of the CSNI report. In that sense, this section could be viewed as an update to Section 4 of the CSNI report; even though the two reports have different sponsorship.

Attempts to resolve two major uncertainties listed in the previous CSNI document were specifically addressed herein. These uncertainties were:

1. A proven, accurate, and repeatable methodology for predicting the head loss caused by mixed beds is not yet fully developed. Although the U.S. NRC methodology performs well for flat strainers, its application to specialty strainers has not been established.
2. Different test methodologies, setup design, and test debris preparation may contribute significantly to pressure drop. No systematic evaluation has been performed to discuss desirability of each test methodology *vis-à-vis* other methods.

This section summarizes the present understanding of the underlying phenomena and their effect on the head loss and reviews the experimental and analytical options available for strainer design and performance evaluation. Although the knowledge base that can be used for such calculations has grown over the last decade, data are still incomplete for several combinations of materials present in U.S. and European nuclear power plants (e.g., asbestos or other micro-porous materials). Therefore, this section makes several recommendations on the need to obtain further head loss data or for analysis of existing data.

Section 7.1 identifies the underlying phenomena that affect head loss across the debris bed and provides phenomenological discussions related

to their importance. Section 7.2 presents a summary of the test design approaches adopted by various researchers and their relative advantages. Section 7.3 provides analytical approaches for estimating pressure drop. Section 7.4 discusses ongoing research on outstanding issues.

### 7.1 Factors Affecting Debris-Bed Build-Up and Head Loss

Head loss across the debris bed depends to a great extent on the debris bed constituents and their morphology. Debris beds of the most likely importance can be divided broadly into the following groups: (a) fibrous debris beds, (b) mixed fibrous and particulate debris beds, (c) beds formed by fragments of RMI, and (d) mixed RMI and fibrous debris beds.

#### 7.1.1 Fibrous Debris Beds

The accumulation of fibrous debris on the strainer resembles flow through a porous medium (Figure 7-1). Typically, the flow to a strainer would deposit the fibrous shreds on the strainer surfaces such that the fibers generally lay across the strainer penetrations (i.e., somewhat perpendicular to the flow). The subsequent drag caused by the fibers would create a pressure differential across the bed of debris. As the pressure drop across fibrous beds increases, such beds have been observed to compress, leading to progressively higher head losses. Furthermore, it has been observed that compressed beds do not completely regain their original state when the water flow is terminated. In most cases, the experimental data obtained for fibrous beds can be explained using conventional porous-media head loss correlations.<sup>7-2</sup> The insights discussed in the following paragraphs were gained through close examination of the test data.

Head loss across a debris bed increases linearly with velocity in the viscous region and increases to the square of the velocity in the turbulent region.<sup>1</sup> Any model used to predict head loss across the strainer should take both these factors into consideration (unless the model is

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<sup>1</sup>A combination of these asymptotes can be used to describe the head loss behavior for velocities that lie in the transitional region.

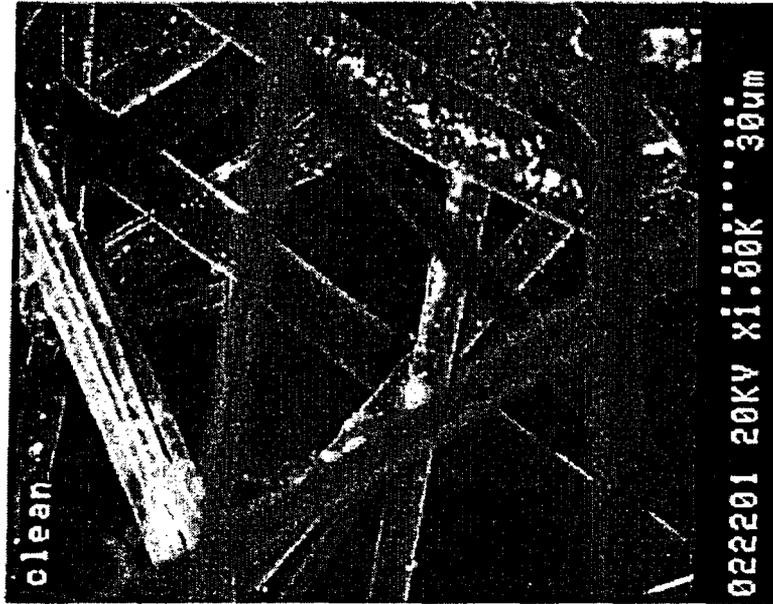


Figure 7-1(a) High-Resolution Scanning Electron Microscope Image of Fibrous Debris

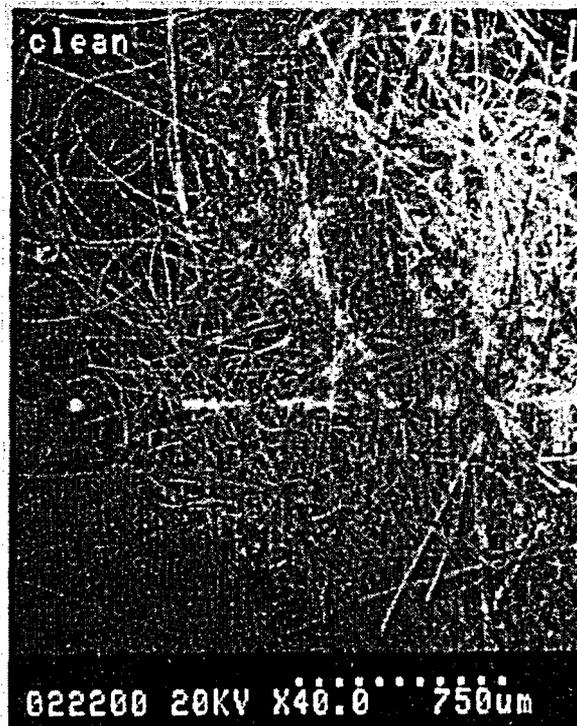


Figure 7-1(b) Low-Resolution Scanning Electron Microscope Image of Fibrous Debris

developed for a specific velocity range and is not intended to be applied outside that range). Reference 7-2 provides a method for including viscous and turbulent head loss regimes into a single correlation.

Head loss across the strainer is dependent on the quantity of the fibrous debris trapped on the strainer surface. A convenient measure for the quantity of fibrous debris trapped on the strainer is the debris bed thickness based on the as-fabricated density of the insulation, i.e. defined as the mass of fibrous debris per unit of strainer area divided by the as-fabricated density. This thickness has been generally referred to as the "theoretical" thickness. Typically, head loss varies linearly with bed thickness for beds that are uniform or nearly uniform. Deviation from this linear behavior has been seen where debris has accumulated in a non-uniform manner on the strainer surface, specifically such behavior has been observed at lower bed thicknesses, where clumps of fibrous debris have been observed to deposit non-uniformly on the strainer surface.<sup>2</sup> The non-uniformity also may lead to lower filtration efficiencies for entrapment of non-fibrous debris passing through the strainer. As a result, the pressure drop for non-uniform beds would be lower than that predicted by extrapolating data obtained for uniform beds. This is an important issue that should be taken into account when evaluating specialized strainers designed to collect debris in a non-uniform manner (e.g., a star strainer).

The size distribution of the fibrous debris is another factor that significantly influences head loss. Fibrous debris reaching the strainer may vary in size from individual fibers to shreds or clumps to large pieces of torn blankets. Experiments conducted before the Barsebäck-2 incident (incident described in Section 9.1) typically used larger debris fragments or regularly cut pieces of the fibrous blankets.<sup>7-3</sup> The Barsebäck-2 incident and investigations since then have demonstrated that finer debris fragments are more likely to reach the strainer than the larger debris. As a result, considerable attention was given to studying the head loss characteristics of finer debris, which is much

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<sup>2</sup> At very low thicknesses, the debris bed may resemble a partially blocked strainer, where only a small fraction of the flow passes through the debris layer and the remaining flow passes through the open area.

more likely transport to the strainer surface. Comparison of the pre- and post-Barsebäck-2 experimental database would suggest that, in general, finer debris forms more uniform and compact beds, which are more resistant to flow than non-uniform or loose beds. Because finer shreds have generally lost their original blanket structure, the finer debris is more compressible than large pieces of debris. Based on this observation, it can be concluded that considerable attention should be paid to ensure that the size classifications of debris used in the experiments are representative of the debris expected to reach the strainer following a LOCA. Ultimately, engineering judgment must be relied upon to arrive at the debris size classifications used in the experiments. This judgment should be based partially on the following considerations: (a) the debris-size class is influenced strongly by the type of insulation, the mode of encapsulation, and the duration of its exposure to harsh environments (i.e., its age) and (b) debris disintegration would occur not only during its generation but also during its transport (e.g., thrashing due to pool turbulence). These factors should be considered when designing new experiments or evaluating the applicability of a particular set of experimental data.

Additional factors that influence head loss include fibrous material type (e.g., mineral wool vs fiberglass) and water temperature. Typically, higher water temperatures result in lower pressure drops that are caused primarily by corresponding decreases in the water viscosity. Analyses have successfully handled this effect by simply accounting for the temperature dependency in viscosity in the respective head loss correlations. Similarly, the differences in materials can typically be handled by accounting for differences in the material properties of the insulation and the individual fibers. A consistent approach to handling both these factors is described in Appendix B and in Reference 7-2. Particular attention should be paid to ensure that type(s) of debris used in the experiments and analyses are representative of the debris expected to reach the strainer. Head loss estimates should also consider debris generated from the destruction of the jacketing or encapsulation materials used to install the insulation (e.g., fiberglass cloth).

Finally, the effects of water chemistry (pH) on head loss have been studied for fibrous insulations. The data thus far indicate that this

effect is minimal for the fiberglass insulations commonly installed in U.S. nuclear power plants (i.e., Nukon, Thermal Wrap, and Kaowool). However, most tests were conducted over a shorter interval and did not examine pH in conjunction with the higher temperatures typically expected for PWRs (e.g., 50–70°C). Some European investigators concluded that pH could dissolve some of the chemical coatings applied to the fibers, leading to their degradation and the formation of even more compact beds.<sup>3</sup>

### 7.1.2 Mixed Particulate and Fiber Beds

The Perry incident first demonstrated (and it was later confirmed by the Limerick incident) that fibrous debris beds would filter the particulate debris passing them, leading to the formation of very compact beds, and that such beds induce high head losses<sup>7-4,7-5</sup> (both incidents are described in Section 9.2). Before the Perry incident, the majority of the investigations focused on measuring head loss for pure fiber beds. However, since then the focus shifted from pure fiber beds to debris beds formed of fibrous and particulate mixtures. The particulate mixtures examined typically included corrosion products, paint chips, organic sludge, concrete dust, and fragments of non-fibrous insulation (e.g., calcium-silicate). Attempts have been made to characterize the characteristics of the debris (e.g., size distributions) and to use appropriate material to simulate LOCA-generated debris in experiments and the appropriate characteristics in analyses. Subsequent experiments have shown that the addition of particulate debris would increase the pressure drop substantially.<sup>7-2</sup> This data clearly demonstrated that the head loss could increase by a factor of 100 as the particle-to-fiber mass ratio goes from zero to about 20. This is discussed further in Section 7.3.1.1 and in Reference 7-2.

The experiments also established that for a fixed amount of particulate debris, pressure differentials across the bed are significantly higher for smaller, rather than larger, quantities of fibrous material. This effect, which often is referred to as the thin-bed effect, has been studied extensively. Closer examination of the bed morphology reveals that thin beds closely resemble granular beds (rather than fibrous

beds) and that higher head loss is a direct result of bed morphology.

This effect is illustrated in Figure 7-2, which shows head losses vs fiber volume for fixed quantities of particulate, as predicted using the NUREG/CR-6224 head loss correlation. In Figure 7-2, the thin-bed peaks (near the center of the figure) reflect the higher head losses associated with the thin layer fiber supporting a granular bed of particulates. Note that head losses for mixed beds only exceed those of the thin beds at the excessively large volumes of fiber (at the right side of the figure). Even if a plant has large quantities of fibers that could lead to potentially thick mixed beds of debris, the initial bed formation would begin with a thin layer of fibers that could cause a thin bed head loss relatively early into the accident.

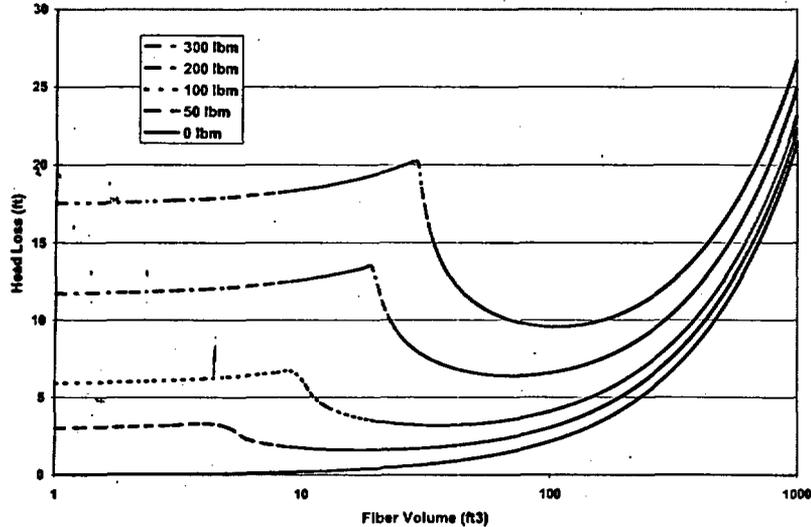
A significant number of experiments have been carried out to measure the head loss effects of mixed particulate and fibrous debris beds. The particulate debris of primary importance to many of the investigators was suppression-pool sludge. Fewer investigators focused on obtaining experimental data for debris other than sludge. The key findings are discussed in the following paragraphs.

#### Sludge

Corrosion products, primarily, along with dirt, dust, and other residues commonly found in U.S. BWR suppression pools are referred to as the BWR sludge or sludge. Surveys of U.S. BWR pools found that significant quantities of sludge are present in the suppression pools. Similar surveys of the European BWR suppression pools suggest that quantities of sludge are minimal in European pools. As a result, the majority of the head loss data for sludge and fiber combinations was obtained in the U.S.

The head loss effects of sludge were found to depend on the size distribution of the sludge. The U.S. NRC and BWROG established a consensus position on the sludge size distribution for use in experiments. It was based on the survey of U.S. BWR suppression pools. The base of U.S. knowledge on fiber and sludge head loss behavior is summarized in NUREG/CR-6224<sup>7-2</sup> for flat-plate-strainer geometries and the BWROG URG for large-scale strainers of different designs. Additional proprietary data exist for advanced strainers, such as GE stacked-disk strainers and ABB strainers (described in Sections 8.2.1.2 and 8.2.1.3). It

<sup>3</sup> Personal communications from M. Henricksson, Vattenfall.



**Figure 7-2 Head Losses vs Fiber Volume for Fixed Quantities of Particulate**  
(Predictions assumed LDFG insulation debris, dirt particulate, 200°F, 100 ft<sup>2</sup> of screen area, and 5,000 GPM flow.)

has been shown repeatedly that NUREG/CR-6224 provides a reasonable upper bound estimate for head loss caused by fiber and sludge mixtures.

#### Miscellaneous Debris

It was recognized that miscellaneous forms of particulate debris could also accumulate in a fibrous debris bed on a strainer along with the dominant form of particulate. ARL first reported head loss data for miscellaneous debris combinations.<sup>7-27</sup> In these NRC-sponsored experiments, head loss was measured for fiber, paint chips, and rust flakes. No correlations were developed for that data. The most comprehensive database for miscellaneous debris is reported by the BWROG using a gravity-driven head loss setup. BWROG quantified the head loss effects of corrosion products, paint chips, rust flakes, sand, cement dust, zinc filler, and calcium-silicate. The measured data were summarized in the BWROG URG.<sup>7-10</sup>

#### Calcium-Silicate

The head loss behavior of calcium-silicate debris materials has been investigated in various facilities, including the tests conducted by Vattenfall Development Corporation,<sup>7-19</sup> the BWROG,<sup>7-10</sup> and ITS Corp.<sup>7-28</sup> The publicly available data on the head loss as a result of mixtures of fiberglass and calcium-silicate insulation debris materials from these

experiments is summarized in Table 7-1. The tests were conducted at water temperatures between 60 and 70°F.

The assessment of the publicly available data on the head loss behavior of mixtures of calcium-silicate and fiberglass insulation debris materials indicates that calcium silicate in a fibrous debris bed affects the pressure differential across that bed in the same manner as the corrosion products, however that effect under certain conditions is stronger for the calcium silicate particulate.<sup>4</sup> Another way to look at this effect is that when predicting a debris bed head loss, if the calcium silicate is treated as a simple particulate, it can cause a serious under-prediction of the head loss under certain conditions.

Further this effect appears to be dependent on the theoretical fibrous-debris-bed thickness. For a relatively thick fibrous bed, the effect could be relatively small, however for a relatively thin fiber bed, the effect of calcium-silicate debris materials can be substantial. In fact, for the same fiber loading and flow conditions, the head loss with calcium-silicate may increase the head loss without calcium-silicate by a factor of about 50 when the theoretical fiber bed is about 0.5 in.

<sup>4</sup> Calcium silicate in a member of a type of insulation referred to as micro-porous or particulate insulations (Section 2). Other members of that insulation type would behave in a similar manner.

Test	Screen Area (ft <sup>2</sup> )	Flow Rate (gpm)	Fiber Mass in Tank (lbm)	Cal-Sil Mass in Tank (lbm)	Head Loss (ft-water)	Ref.
0	0.08	5	0.066	0	8.7	7-19
4	0.08	5	0.015	0.003	12.5	7-19
7	0.08	5	0.033	0.033	7.4	7-19
9	0.08	5	0	0.013	10.5	7-19
11	0.08	5	0.004	0.004	9.0	7-19
13	0.08	5	0.013	0.002	14.3	7-19
16	0.08	5	0.024	0.024	11.8	7-19
20	4.7	200	0	0.09	0.8	7-28
21	4.7	200	0.6	0.09	12	7-28
22	4.7	200	6	0.09	3.8	7-28
29	4.7	200	0.6	0	0.9	7-28
18*	18	5000	12	0	16.7	7-10
19**	18	5000	12	5	33.3	7-10

\*Test 29 included 1.8 lb of corrosion products in the tank.  
\*\*Tests 18 and 19 also included 180 lb of corrosion products in the tank.

Based on these results, it may be possible that the head loss resulting from mixtures of fiberglass and calcium-silicate debris materials can be estimated by the NUREG/CR-6224<sup>7-2</sup> head loss correlation in combination with a bump-up factor<sup>5</sup> that is a function of the theoretical fibrous-debris-bed thickness, however, further analysis is required to support this conclusion.

In contrast to other types of particulate, the test data indicate that calcium-silicate debris materials cause a head loss even without fibrous insulation debris present in the bed. Calcium silicate insulation contains its own fibrous material, however these fibers tend to be very fine and therefore pass more easily through strainers than does the fibers from fibrous insulations. Corrosion products would simple

<sup>5</sup> As originally proposed by the BWROG,<sup>7-10</sup> the bump-up factor was the ratio of the head loss due to fiber, corrosion products, and miscellaneous debris to the head loss of the fiber and corrosion products without the miscellaneous debris (at a specified velocity). In other words, it became a method for accounting the addition of particulates other than corrosion products under conditions where corrosion products were the main source of particulate (BWR conditions). In this discussion, the bump-up factor represents the relative increase in head loss due to calcium-silicate when corrosion products are not present (PWR conditions). When using a bump-up factor method, the bump-up factor must be defined along with the data for a complete understanding of that data.

pass through the strainer if a material like fiber were not present to filter the particles from the flow.

Experiments are ongoing at the University of New Mexico (UNM)<sup>7-31</sup> under U.S. NRC sponsorship to study the head loss effects of calcium-silicate. Data from these studies confirm the following trends.

- The addition of calcium-silicate significantly increases head loss and a bed formed of calcium-silicate and fibrous debris is compressible and compact.
- The head loss effects of calcium-silicate in combination with fibrous debris are sensitive to the operating temperature of the flowing water, i.e., higher temperatures typically induced higher head losses from what appears to be a chemical softening of calcium-silicate.
- Calcium-silicate can induce significant head losses by itself, without the simultaneous presence of the fibrous debris.
- The NUREG/CR-6224 correlation will need considerable modification if it is to be used to predict calcium-silicate head loss estimates.

### 7.1.3 Reflective Metallic Insulation

The head loss caused by RMI fragments has been studied experimentally by various U.S. and European investigators.<sup>7-8,7-7,7-8,7-9</sup> Review of these experiments suggested that the head loss

caused by RMI fragments is extremely sensitive to the type, shape, and size of the fragments used in the testing program because these properties of RMI debris effect the bed structure, i.e., the pressure differential across a bed of RMI debris is strongly dependent upon the structure of that bed.

LOCA generated RMI debris would likely consist of pieces ranging from small and deformed shreds, to large sheets of foil with varying degrees of damage, to relatively intact cassettes. The relative damage to RMI insulation would depend upon its relative location to the LOCA jet, i.e., the higher the jet pressure, the more damage would occur (referred to Section 3.3.3). Insulation exposed to high jet pressures would look more like that shown in Figure 3-8. At lower pressures, the debris would contain more of the larger pieces as illustrated by Figure 3-19 showing data from the BWROG tests. Although a spectrum of debris would be generated, the spectrum of sizes on the strainer would be skewed towards the smaller sizes because the smaller pieces would transport to the strainer or sump screen substantially easier than would the larger pieces. It takes, for example, a relatively fast flow of water to move an intact RMI cassette along the floor of the sump.

Whereas research performed in Finland tended to focus on larger RMI foils accumulating on the strainer, recent research in the U.S. focused on the smaller debris. Early U.S. research focused on damaged cassettes producing large foils. These different research focuses tended to produce differing results and perhaps conclusions that were more appropriate for the respective classifications of debris. The smaller debris would transport easier to the strainer, causing more debris accumulation, and would accumulate in a random pattern. Alternately, larger relatively flat foils, assuming the pieces could transport to the strainer, could conceivably accumulate in a somewhat organized and stacked arrangement resulting in higher postulated head losses than would be caused by the random small piece debris bed. Thus, RMI debris head loss considerations are dependent upon the conditions of debris generation and debris transport.

**U.S. Research on Large Foils of RMI**  
Experiments performed as part of USI A-43 postulated that damaged RMI cassettes would

release large (primarily) undamaged foils that then would be transported and accumulate on the sump screen.<sup>7-3</sup> However, the focus of the testing was measuring the water velocity required to flip the foils onto the screen, assuming the foils could be transported to the base of the screen. It was assumed that after the foils accumulated on the screen, the foils would partially block the flow. Very little experimental data were collected on the head loss implications; instead, the emphasis was on the square footage of transported debris versus the screen open area.

**U.S. Research on Small Pieces of RMI**  
Experiments performed as part of BWR strainer-blockage research used small pieces of simulated stainless steel and aluminum RMI. Based on actual collected LOCA steam/water jet generated RMI debris, simulated debris was hand manufactured to resemble the actual debris by cutting RMI foils from an insulation cassette into small sheets and then artificially damaging the foils. This process resulted in pieces of RMI debris referred to as 'crumpled' debris. (Further descriptions of the debris and the head loss data are provided in the later sections.) These experiments demonstrated that RMI fragments typically form loose beds that induce low head losses. Figure 7-3 is a picture of RMI debris accumulation on a strainer. Visual examination of the RMI debris beds suggests that crumpled RMI fragments accumulated with their major cross-sections aligned generally perpendicular to the flow direction. It is also apparent that crumpled debris beds tended to be relatively uniform and typically have high porosity. The beds formed of smaller debris tended to be more compact than the beds formed of the larger debris; the most compact debris bed was observed when fragments ranging in size from ½ in. to 4 in. were allowed to accumulate randomly on the strainer surface. Finally, aluminum RMI debris tended to form more compact and compressible beds than did stainless steel RMI debris. As a result, aluminum beds resulted in approximately 25% more head loss than the stainless steel debris beds for a fixed number of foils. Head loss data for crumpled RMI debris were obtained in the U.S. by (a) the NRC;<sup>7-9</sup> (b) the BWROG;<sup>7-10, 7-14</sup> (c) Performance Contracting Inc.;<sup>7-11</sup> (d) GE;<sup>7-12</sup> and (e) the LaSalle nuclear power plant.<sup>7-13</sup>

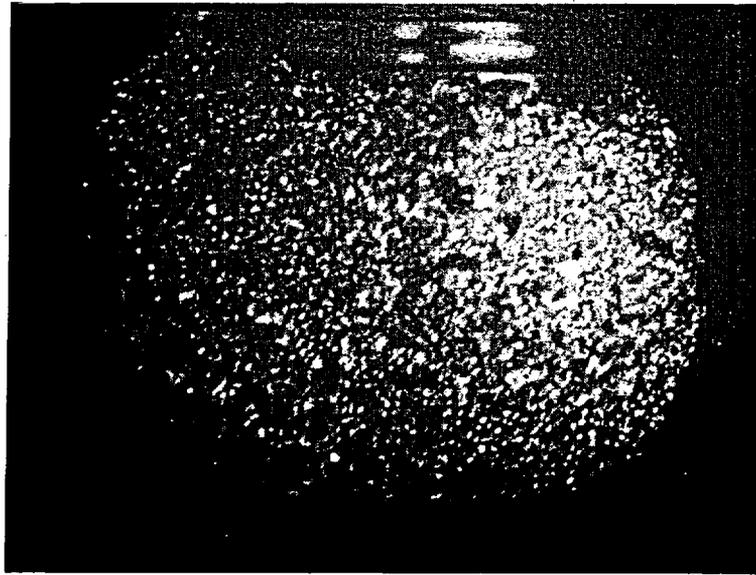


Figure 7-3 Aluminum RMI Accumulation on a Stacked Disk Strainer<sup>7-13</sup>

#### Flat Pieces of RMI

To measure head loss, Finnish researchers used regularly cut pieces of RMI foils that had 1-mm deep dimples and some curvature to the foils.<sup>7-6,7-15</sup> At the time these head loss experiments were conducted, RMI debris had not been adequately characterized; all that was known was that irregularly sized and shaped debris would be produced and this was based on one HDR test. Not being able to reproduce "prototypic" debris, the researchers resorted to parametric studies. Note that the 1-mm deep dimples in the foils were manufactured into the foils to space the foils in the insulation cassettes, hence these dimples also maintained spacing in the foil debris, as well. Although no observations regarding bed structure were made in the original tests, a later investigation provided considerable insights into how bed structure may impact head loss.<sup>7-16</sup>

The understanding of the Finnish researchers was that flat pieces of RMI debris would tend to land flat on the surface of real strainers, thereby building up a bed resembling a disordered deck of cards. The more crumpled the debris, the more space there would be inside the debris bed. In such a model, the flow between the layers of foil can be simulated as flow through channels; hence, pressure changes can be predicted using standard flow channel models (e.g., head loss is proportional to the length

divided by hydraulic diameter). Other researcher insights on pure RMI include:

- RMI debris bed head losses are controlled by bed geometry much more than by characteristics of the individual debris elements; and the geometry in turn is controlled by how the debris arrives onto the screen.
- The larger the batch of debris approaching the filter at a given time, the smaller the head loss, i.e., the accumulation density affects the interstitial spacing in the debris bed so that a higher accumulation density leads to more interstitial space. During testing, the accumulation density can affect the edge effect.
- Accounting for edge effects is important even when testing prototypical strainers.

These data also are described in the following sections and have not been used in the U.S. strainer-design analyses.

#### 7.1.4 Mixed Fiber and RMI Debris Beds

Mixed-fiber and crumpled RMI debris beds have been studied for head loss implications both in the presence of particulate debris and without particulate debris. A typical post head loss debris bed (after removal from the test apparatus) containing RMI pieces, LDFG,

and prototypical BWR sludge is shown in Figure 7-4(a) and a typical RMI/LDFG debris accumulation on a strainer is shown in Figure 7-4(b). The head loss data showed wide scatter. In most cases, the RMI head loss tests demonstrated that the introduction of crumpled RMI debris, in combination with fibrous debris and sludge, does not cause significantly different head losses than those observed with only fiber and sludge loadings. In fact, the most significant finding of the U.S. NRC tests was that under certain circumstances when RMI debris was mixed with fibrous debris and sludge, the head losses appeared to decrease as compared with similar conditions without RMI debris. However, in a few cases (e.g., the BWROG tests), it was noted that the head loss caused by RMI and fibrous debris mixtures was slightly higher than the head losses at the same fiber loading but without RMI. However, in all cases, the head loss caused by RMI debris in conjunction with fibrous (and other debris) was found to be bounded by adding the head loss caused by the individual constituents of the debris bed. As a result, U.S. NRC concluded that head loss impacts of a mixed RMI and fiber debris bed should preferably be based on measurements, or alternately can be calculated as an algebraic sum of fiber and RMI components after accurately accounting for the strainer geometry. However, it should be noted that these types of tests have not been repeated using particulate insulation debris (e.g., calcium silicate) instead of or in addition to the sludge debris actually used.

Finnish investigators also obtained head loss data for flat RMI pieces in conjunction with fibrous debris. They concluded that due to synergistic effects head loss caused by the mixed beds would actually be higher than the sum of individual contributions.<sup>7-5, 7-16</sup>

## 7.2 Review of Experimental Programs

Head loss experiments were conducted by the following investigative organizations located in Europe and the U.S.<sup>6</sup> and were reviewed in this report.

<sup>6</sup>Some experimental investigations were conducted in Canada but their results were not shared in public forums and hence were not included in this review.

- United States Nuclear Regulatory Commission (U.S. NRC)<sup>7-2,7-3,7-9</sup>
- Pennsylvania Power and Light Co. (PP&L)<sup>7-17</sup>
- Performance Contracting, Inc. (PCI)<sup>7-11</sup>
- Finnish Center for Radiation and Nuclear Safety (STUK)<sup>7-6,7-15,7-16</sup>
- Vattenfall Development Co., Sweden (Vattenfall)<sup>7-18,7-19,7-20</sup>
- Kernkraftwerk, Leibstadt, AG (KKL)<sup>7-21</sup>
- ABB Atom/Combustion Engineering (ABB) (proprietary to the company)
- Boiling Water Reactor Owner's Group (BWROG)<sup>7-10</sup>
- Fitzpatrick Nuclear Power Station (USA)
- General Electric Nuclear Energy Company (GE) (USA)<sup>7-12</sup>
- Continuum Dynamics, Inc. (CDI) (USA)<sup>7-22</sup>
- Millstone Nuclear Power Plant (USA)<sup>7-22</sup>
- Zion Nuclear Power Plant (USA)<sup>7-23</sup>
- LaSalle County Nuclear Generation Station (USA)<sup>7-13</sup>
- Mark III BWR Owners Group (USA)<sup>7-24</sup>

With the exception of a few investigators (e.g., Mark III BWR Owners Group, Millstone, and Zion), strainer-head loss measurements were made with no regard for debris transport or the inherent coupling that exists between debris transport and debris build-up. Instead, most tests presupposed that the quantity of debris that might be deposited on the strainers could be determined through other means, such as the assumption that debris would be distributed among operating strainers in proportion to their relative flow rates. Furthermore, the experiments sought to create conditions that assured uniform bed formation on the strainers.

The experimental approaches varied considerably, depending on what information was sought. The test setups used by these organizations can be divided broadly into four categories.

1. Horizontal flat-plate strainer setup arranged in a closed-loop test section
2. Vertical flat-plate strainer setup arranged in flumes
3. Prototype strainer modular testing
4. Semi-scale strainer testing

A review of the experimental approaches suggested that the approaches chosen have varied considerably, depending on the

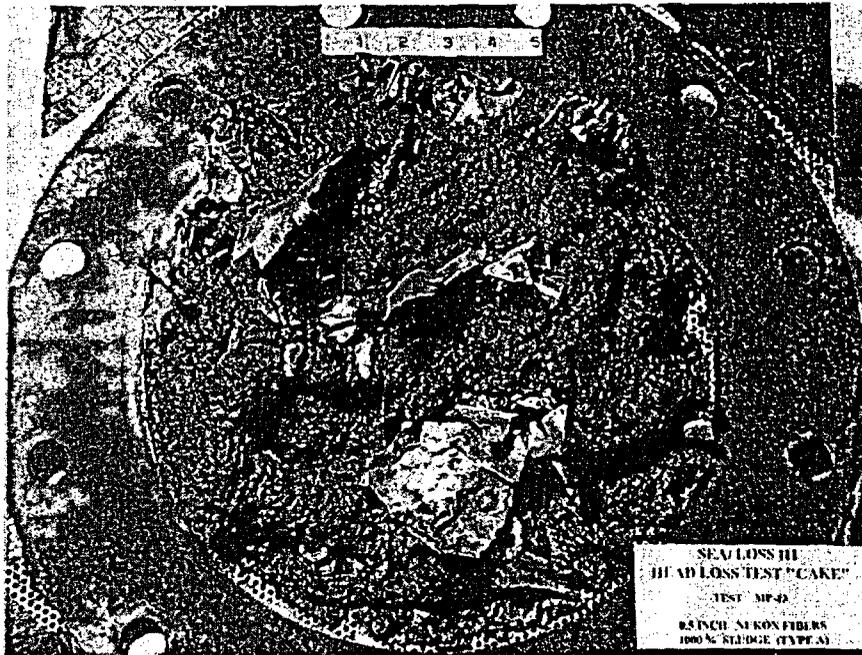


Figure 7-4(a) RMI/Fiber/Sludge Post Head Loss Test Debris Bed

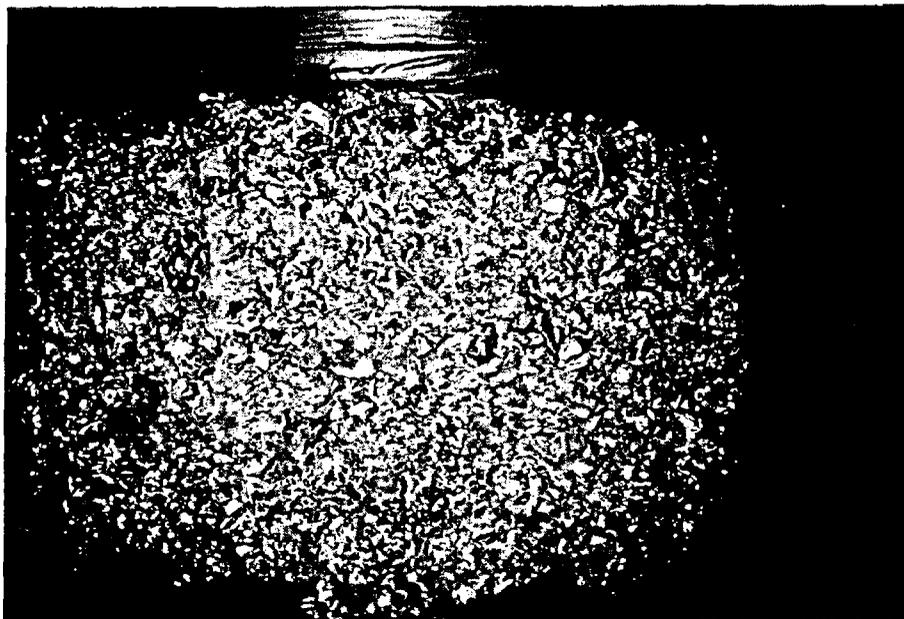


Figure 7-4(b) RMI and Fiber Accumulation on a Strainer

objectives of the experimenter, which varied from obtaining prototype test data that can be used directly in the plant-specific analyses to collecting separate-effects test data that can be used to develop a differential head loss model, which in turn can be used in the plant-specific analyses. Correspondingly, test geometries and test procedures have varied significantly. These differences have been known to contribute significantly to the test data variability, as elaborated below.

- *Differences in the test setup and geometry can introduce significant variability in the test data.* An example is that head loss measured across prototype strainers (e.g., a stacked-disk strainer or the ABB/CE strainers) at small debris loadings<sup>7</sup> was found to be significantly different from that measured across flat-plate strainers (or semi-conical strainers) at the same debris loading. The difference is more pronounced for certain combinations of debris types and flow velocities. Typically, this difference is attributed to the fact that debris build-up on the special-shape strainers is unique and non-uniform. As a result, prototype strainers tended to exhibit nonlinear relationships between head loss and debris loading, which is in stark contrast to the linear relationship observed for flat-plate strainers. These differences in the data trends led some experimenters to conclude that flat-plate strainer data could not be used to predict the head loss caused by special strainer shapes.

Even among flat-plate strainer experiments, the data variability is significant between the NRC/ARL tests, which used closed-loop systems equipped with pumps, and the CDI/BWROG gravity-head loss tests. Here the differences can be attributed to differences in the bed compression and bed formation.

- *Differences in test procedures may add to some of the data variability.* Experiments have shown that differences in (1) the time sequence in which different debris species accumulate on the strainer and (2) the concentration at which debris approach the strainer affects head loss considerably.

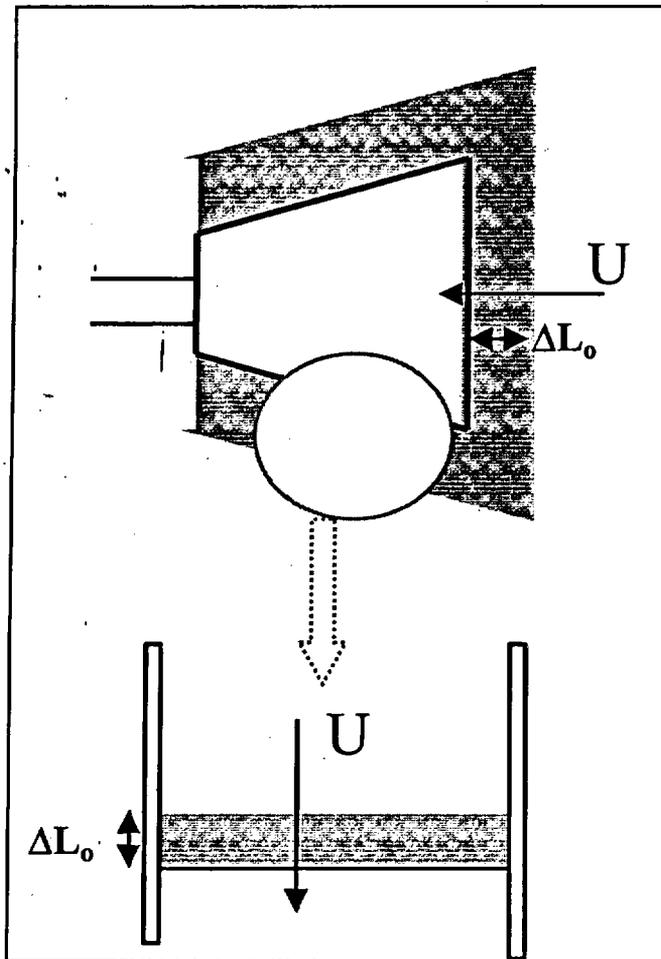
<sup>7</sup>Expressed in terms of debris mass per square-foot of the strainer area or, alternately, in terms of theoretical thickness.

These differences were found to affect bed morphology and uniformity.

This observed variability in the head loss measurements has led to confusion regarding the acceptability and applicability of test-data usage in the plant-specific analyses. In particular, it often has led to debate, without a consensus outcome, on what is the most appropriate approach for assessing strainer pressure drop performance. This uncertainty was reflected in the CSNI report. But as the research matured, common frameworks for addressing the variability has emerged, and this section takes a critical look at options available for performing tests and their relative merits.

### 7.2.1 Flat-Plate Strainers

Before the 1990s, the ECCS designs used conventional suction strainers (e.g., truncated-cone strainers, cylindrical strainers) and rectangular sump screens. The earliest experimenters (USI A-43) used small, perforated strainer plates to experimentally simulate the head loss performance of these regularly shaped strainers with the understanding that debris build-up on conventional strainers would be fairly uniform and that at a differential scale, the flat-plate would be a reasonable approximation for the curved strainer surface. Figure 7-5 illustrates how a portion of the debris bed on a strainer would behave in a manner similar to debris in a test loop, assuming both have a like thickness and composition. The validity of this assumption depends somewhat on the thickness of the debris bed. For a thin bed, the assumption is certainly valid, but for a thick bed, the curvature of the strainer may have to be considered because there would be more debris per unit area in a curved bed than in a flat bed of the same strainer area due to the curvature. However, this consideration has generally been less significant than other experimental uncertainties. Thus, flat-plate strainers present the simplest similitude for the conventional suction strainers/sump screens. The only scaling issue considered to be important relates to the dimensions of the test screen perforations relative to actual strainer perforations. (BWR strainers commonly used plate strainers compared with PWR sump screens that use wire-mesh screens.)



**Figure 7-5 Equivalency Between a Truncated Cone Strainer Debris Accumulation and Flat-Plate Strainer Simulation**

A typical example of a flat-plate-strainer test setup is presented in Figure 7-6. This test setup was originally used in the U.S. NRC tests that supported the resolution of USI A-43. Several insulation and strainer vendors, PCI and Transco, and nuclear power plant owners also used this same setup. In this setup, a 1-ft-diameter perforated plate, with a representative diameter for the perforation holes, was arranged horizontally in a closed loop equipped with the necessary instrumentation. A large-capacity pump capable of maintaining sufficiently high velocities circulated water through the test loop. Debris was introduced at the top of the setup and allowed to settle down on the strainer face and the corresponding head loss was measured.

The primary advantages of this type of testing are as follows.

1. Because the volume of water present in the test setup is small, it is possible to conduct the tests at elevated water temperatures and appropriate water pH and to quantify the effect of water temperature and pH on head loss.
2. The low surface area of the piping and equipment also means that it is easier to clean the test setup between tests.
3. Because the test setups typically use small strainer plates, the quantity of debris to be used in each test is small. This reduces the costs of experiments.

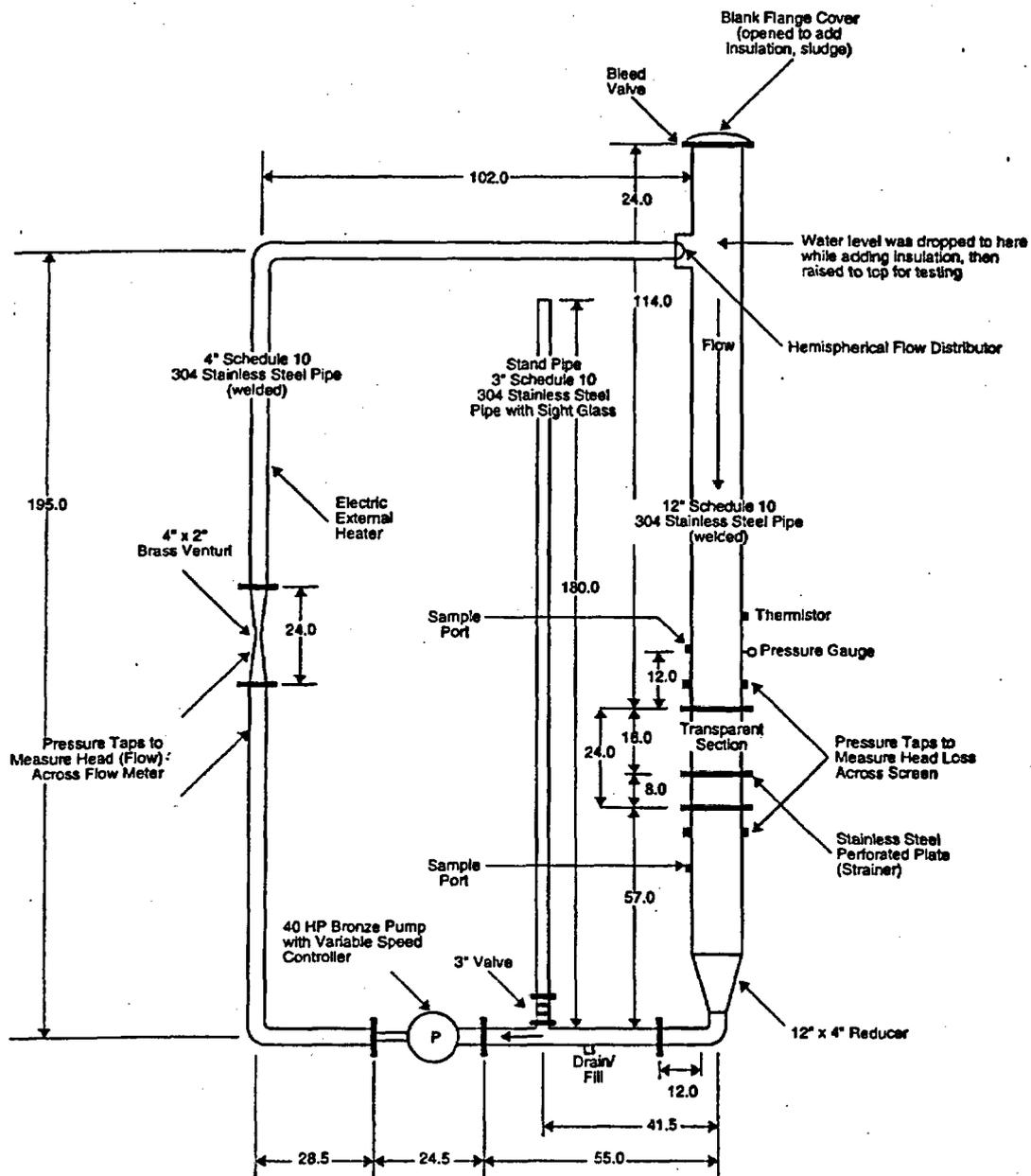


Figure 7-6 Vertical Flat-Plate-Straener Head Loss Facility at Alden Research Laboratory<sup>8</sup>

<sup>8</sup> Such a facility is also operational at the University of New Mexico where head loss testing is ongoing at this time.

4. The experimenter can access the strainer easily after testing is completed and retrieve the debris bed without disturbing it. This allows the option to measure the actual quantity of debris, especially the sludge-like fine debris, deposited on the strainer surface *vis-à-vis* the quantity added to the loop and to examine the bed morphology analytically. This information can be used to develop a direct relationship between the bed morphology, the quantity of debris on the strainer, and the resulting head loss.

There are four major drawbacks for this particular design:

1. The debris introduction is artificial and non-representative. The experimenter drops the debris at the top of the setup and allows it to be deposited on the strainer under the combined influence of gravity and fluid drag. If performed improperly, this could result in some non-uniformity, which has a potential to render the test data non-conservative. It is strongly recommended that test procedures be developed to ensure that the debris build-up would be uniform. Introduction of debris over a long period of time and uniformly across the flow cross section seems to overcome this drawback.
2. The presence of the wall around the strainer has a potential to create peripheral gaps between the debris and the wall (because of the irregular shape of the debris). If these gaps are sufficiently large, a significant portion of the flow may pass around the debris bed instead of through it. This is an inherent shortcoming of these tests; as noted by STUK investigators, if close attention is not paid to this issue, it could lead to non-conservative test data. This concern appears to be significant for large irregularly shaped debris, such as RMI. For smaller debris, this concern may not be critical, but nevertheless should be evaluated and either eliminated (if possible) or minimized. In general, if the characteristic dimension of the largest debris is much smaller than the test filter dimensions, then the peripheral gap effect will not invalidate the test results.
3. Some of the finer debris (e.g., sludge) may settle out in the loop where the flow velocities are expected to be low. Concentration measurements should be used to ensure that finer debris is not

settling out in the loop. Furthermore, the loop should be designed to ensure that the flow velocities in the horizontal sections are sufficiently large to rule out extensive deposition of finer debris.

4. It is not possible to obtain single-pass-through filtration data from this closed-loop system. If information regarding the filtration efficiency of debris bed is important, then other alternatives to this setup should be sought.

#### Important Considerations for Future Experimenters

Although the flat-plate-strainer similitude was known to possess several shortcomings, it has long been thought that this approach would result in "conservative" head loss measurements for most debris types of interest.<sup>9</sup> The acceptability of this approach has gained considerably from the fact that these tests are easy to design and conduct. Furthermore, because these tests are cheaper, it is possible to repeat them extensively and also to perform several exploratory tests to identify controlling test conditions that should be captured in the larger scale experiments. As a result, many investigators have used this test setup and reported experimental data for a variety of insulations and fluid velocities. Also, much of these test data formed the basis for several regulatory decisions both in the U.S. and Europe. In any case, the use of the flat-plate head loss data in conjunction with prototype strainer testing has proven to be an effective method of evaluating strainer head loss.

These tests are ideally suited for the following purposes:

1. *To perform separate-effects tests.* These tests explore the effect of each individual test parameter (either separately or in select combinations) on the head loss. Such an understanding would help the experimenter (a) to assess the need for conducting larger-scale tests and (b) to optimize the number of tests to be conducted in the larger scale tests.

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<sup>9</sup>If proper procedures are followed, the setup allows for uniform distribution of debris on the strainer surface and thus results in higher head losses than the plant strainers.

2. *To augment larger-scale test data.* For example, consider that an experimenter obtained head loss data for fibrous debris bed formed on a stacked-disk strainer. The vendor now would like to quantify the effect of adding a small quantity of calcium-silicate on the head loss. The closed-loop flat-plate-strainer test setup can be used to measure the bump-up in the head loss (caused by addition of calcium-silicate) and use that information to scale the large-scale test data proportionally. Several past investigators have used this approach to augment strainer data and account for the effect of small quantities of miscellaneous debris (e.g., paint-chips, calcium-silicate, and asbestos). However, it should be noted that (a) the fluid velocity through the bed in complex strainers varies considerably and (b) the bump-up factor also varies with fluid velocity. Therefore, data from a flat-plate strainer, when used to augment larger scale head loss data, should be used judiciously.
3. *To judge performance of regularly shaped strainers.* The flat-plate strainers are a fairly adequate representation of truncated-cone and cylindrical strainers, especially at low debris loads. However, at higher debris loads, the debris build-up on the cylindrical strainers tends to resemble an ellipsoid. Application of flat-plate strainer data at higher debris loads may result in conservative conclusions.
4. *To develop head loss models.* If head loss models that can effectively predict head loss caused by debris buildup on advanced strainer designs can be developed and validated for use with advanced designs, it would streamline the process of tailormaking the strainers for each plant application. Section 7.3.2 provides an approach for how a head loss model developed based on flat-plate strainers can be used to predict the head loss caused by stacked-disk strainers.

Recently, there has been considerable debate among experimenters regarding the benefits of using flat-plate-strainer test setups and the acceptability of the conclusions reached from flat-plate strainer test programs. There has been some evidence presented by STUK investigators that the inherent geometrical features of the flat-plate-strainer test setups and the commonly used test procedures could

have a potential to make the test data non-conservative for some debris types. The specific debris of concern is large RMI, either with or without fiber, although similar concerns may exist for other debris types. There also have been concerns that the application of flat-plate-strainer test data to evaluate the head loss performance of advanced strainer designs is complex and impractical.

#### **Known Variations in the Geometry**

Several investigators used the closed-loop test setup shown in Figure 7-6. Primary examples are (a) U.S. NRC tests for head loss data for fiberglass, sludge, and RMI debris, (b) U.S. vendor tests for measuring the head loss effect of calcium-silicate debris, (c) Bremen Polytechnic tests for head loss data related to KAEFER insulation materials, and (d) KKB Bericht head loss tests. The Swiss investigators and Vattenfall research reportedly modified this experimental setup considerably by to improve the means by which debris accumulated on the strainer plate. Figure 7-7(a) presents a schematic of the test setup used in the KKL tests. In these tests, the flat-plate strainer piece was installed horizontally on the open end of the pump suction line. The pump suction line and the strainer were located in an open tank. The pump takes suction from the tank through the flat-plate strainer and returns the filtered water to the same tank, thus forming a closed loop. The debris was added to the tank and allowed to accumulate on the strainer surface gradually. A mixer was used to ensure that debris would not settle out in the tank.

This design modification retained the advantages of the closed-loop testing (small water volume, small surface area for deposition of sludge-like debris, etc.) and thus still provides an option to conduct tests at elevated temperatures and pH. It is possible that beds formed on the strainer would be more prototypical at the smaller debris loadings. However, at higher debris loadings, it is possible that bed build-up could be affected significantly by the tank turbulence, perhaps thereby affecting bed uniformity at the periphery of the bed. Nevertheless, prospective investigators should evaluate this variation and use it as necessary.

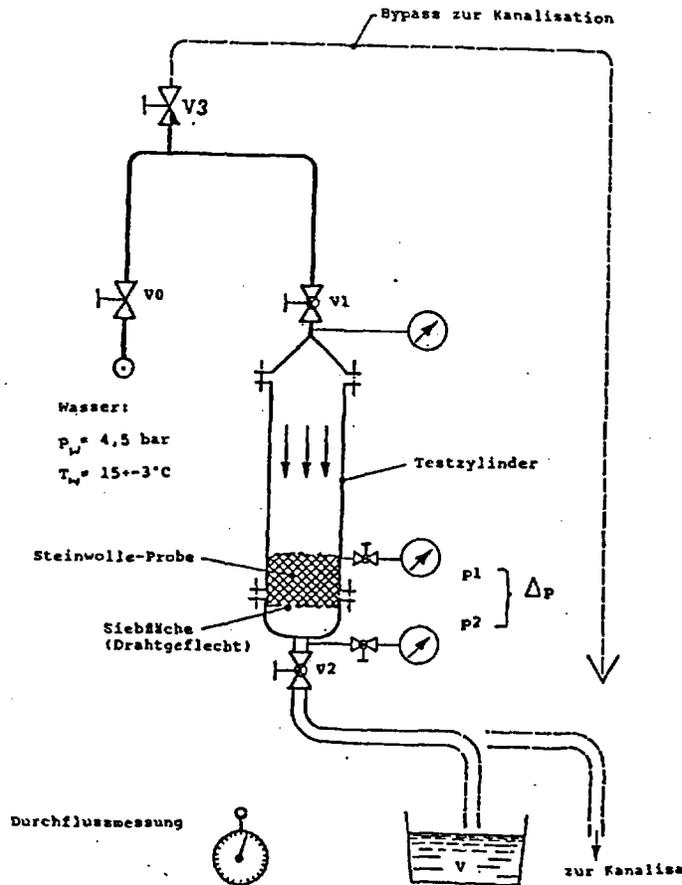


Figure 7-7(a) Flat-Plate-Strainer Head Loss Facility Used in KKL Testing

The BWROG developed an alternative approach that did not involve a pump and had one-through flows. This setup, referred to as the gravity head loss test setup, relied on the static head of water above the strainer to drive flow through the debris bed. As shown in Figure 7-7(b), this apparatus consists of a 16-ft-long, 6-in.-diameter clear plastic tube. The bottom of the tube had a sealed perforated plate to simulate a strainer and the top end was open. Water mixed with debris was introduced to the pipe, and sufficient time was allowed for debris to settle. In theory, because the debris is well mixed with water, the settling process would result in formation of a uniform bed on the strainer surface. Immediately below the strainer plate was a "quick-release" hinged sealing plate that was

opened quickly to induce water flow through the pipe. A pressure transducer monitored the water level as a function of time. This data was used to derive head loss and fluid velocity data. However, this approach had several deficiencies, among them are the following:

- (a) The test setup did not compress the bed before the head loss was measured.
- (b) There was no assurance that the debris beds were uniformly formed, especially when the experiments involved sludge.

This setup consistently resulted in lower head loss measurements. These deficiencies lead the U.S. NRC to conclude that the use of the test data by itself in the plant analyses was not

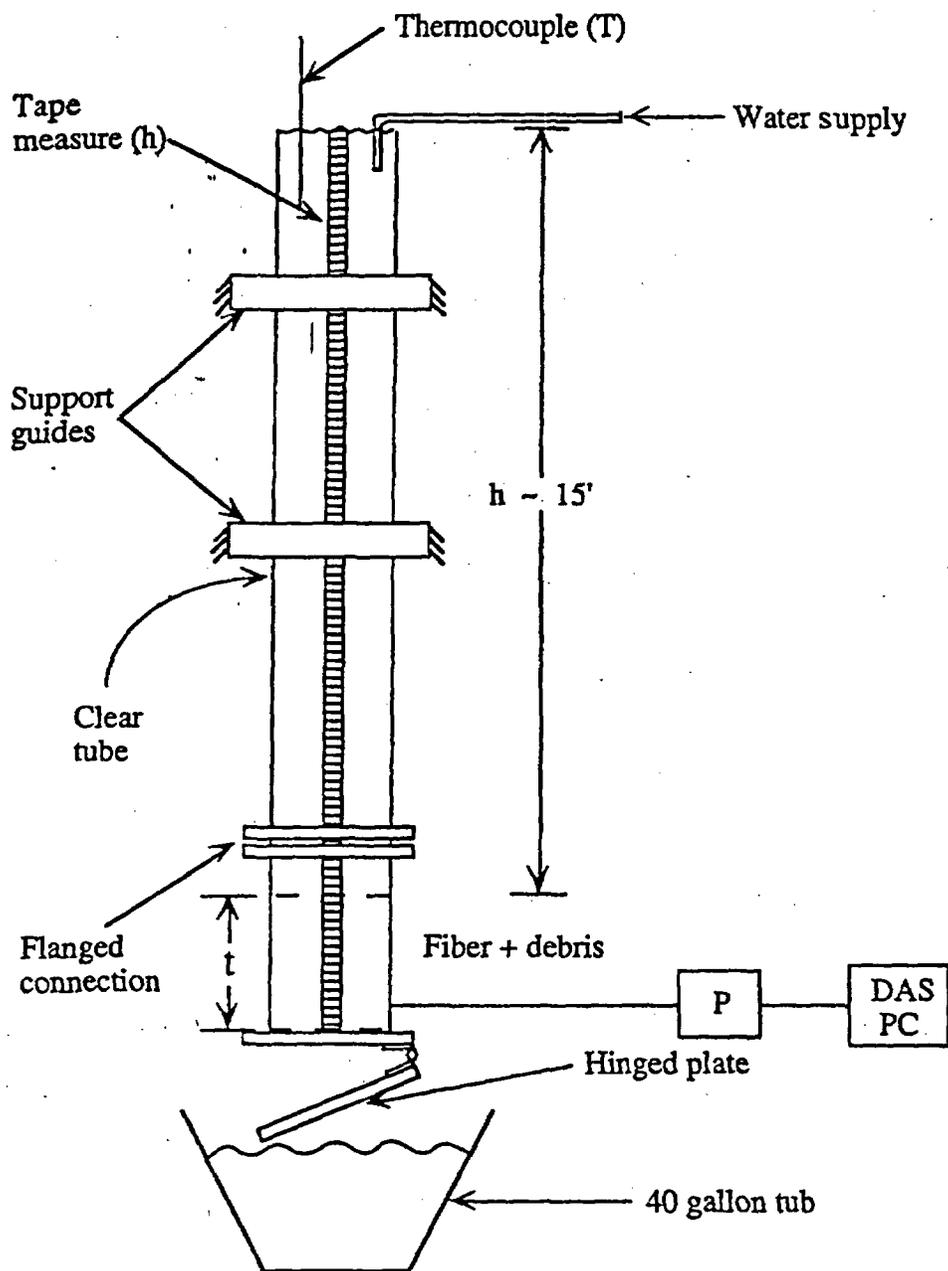


Figure 7-7(b) Gravity Head Loss Test Setup Used in the BWROG Tests

acceptable, therefore only limited use of the test data was allowed. Future investigators are strongly advised against using this setup.

### 7.2.2 Flat-Plate Strainers in Flumes

Starting in the 1980s (e.g., the USI A-43 study), vertical perforated flat-plate strainers located in the horizontal flumes were used to simulate PWR sump screens. Flume transport experiments have shown that debris tends under certain conditions to accumulate non-uniformly on the PWR sump screens, preferentially near the floor. The flume test setups were designed especially to study this type of debris build-up and its effect on head loss. In general, this setup retains the primary advantages of the closed-loop setups described above, and attempts to simulate the unique pattern of debris build-up on the PWR screens at the same time.

Figure 7-8(a) presents a schematic of the test setup used in the early NRC tests. In these tests, a horizontal flume several feet long was used to simulate water flow on the PWR containment floor approaching the sumps. Water enters on the right side of the flume at a pre-selected flow rate and flows through a perforated plate designed to reduce the flow perturbations. Debris introduced downstream of the perforated plate will be transported by the flow to the vertical flat-plate sump screen located near the far end of the flume. The head loss effect of debris build-up was then easily measured. Figure 7-8(b) is a photograph of large foil debris accumulation against the strainer/screen surface.

The primary advantages of this test setup are as follows:

1. This setup provides a more realistic representation, compared with the vertical setup described above, of debris build-up on vertical screens and its potential effect on head loss. Some of the past tests have shown that heavier debris (e.g., stainless-steel RMI and paint chips) would result in relatively small pressure differentials across the screen, due primarily to the observed non-uniformity in the debris bed.
2. This setup can be used to evaluate experimentally the effect of key geometrical features of the sump (e.g., curbs and multiple screens) on the head loss caused

by accumulation of a specific quantity of debris.

3. If sized appropriately, this setup retains most of the advantages listed above for the flat-plate strainer. For example, the setup could be designed to provide high-temperature and high-pH environmental conditions.
4. External means could be used to create prototypical flow patterns closer to the screen to ensure that the debris accumulation is representative of debris build-up on an actual plant sump screen.

The primary disadvantages of this setup are as follows:

1. This setup retains most of the disadvantages of the flat-plate strainers. For example, the presence of the wall around the screen has a potential to create peripheral gaps between the debris bed and the wall.
2. Although the setup presents an illusion that the debris build-up is prototypical, the debris build-up on the screen would not necessarily be representative of actual plant conditions. The debris build-up is a function both of gravity and the flow patterns closer to the screen. It is not necessarily true that a vertical screen arranged in an arbitrary flume would automatically provide the prototypical conditions expected to occur in a plant.

### Important Considerations for Future Experimenters

Although the flume setup has been used for simulating the debris build-up on a PWR sump screen and the resulting head loss, the results should not be applied without careful comparison of the flume flow patterns with those of the real plant. The following factors should be considered while designing the tests:

*Inflow Conditions.* Implicitly, the flume setup attempts to quantify the combined effect of (a) transport and accumulation of debris on the sump screen as a result of flow patterns in the close vicinity and (b) head loss resulting from such a build-up. Therefore, measured head loss should be used in the analysis only if the analyst is reasonably certain that flow patterns close to the screen are indeed representative of the actual plant conditions. It appears that calmer (or longer) flumes provide a reasonable representation of the remote sumps, where

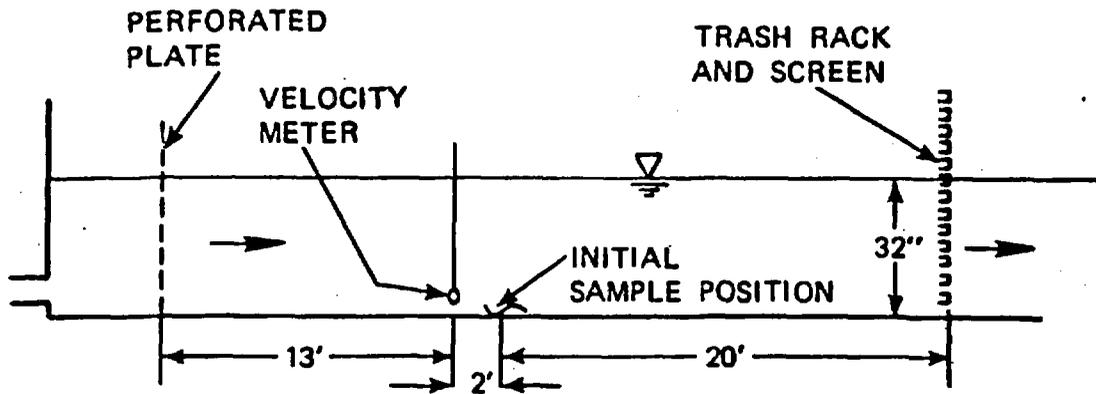


Figure 7-8(a) Schematic of the Horizontal Flume Used in the NRC-Sponsored ARL-Conducted PWR Sump Screen Tests<sup>10</sup>

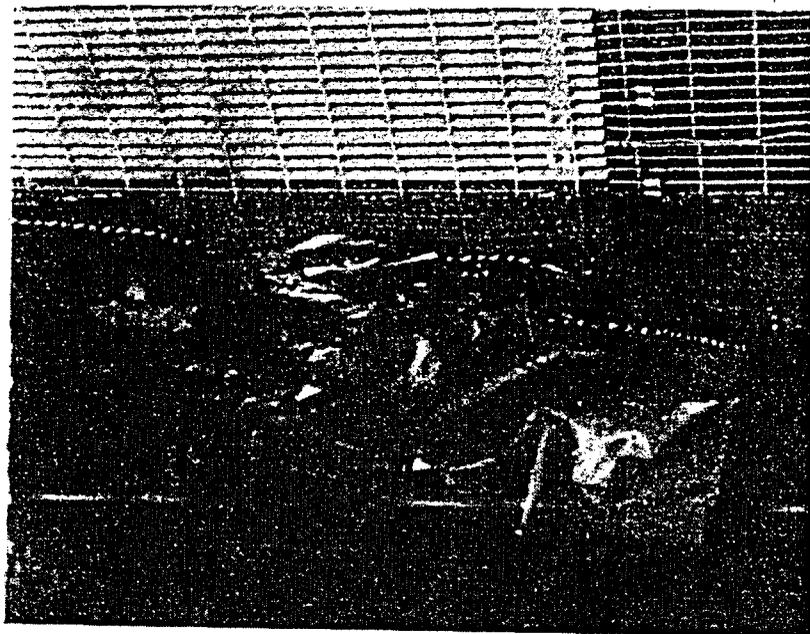


Figure 7-8(b) Picture of Large RMI Foil Accumulation on the Vertical Screen

<sup>10</sup> Such a facility is also operational at the University of New Mexico where head loss testing is ongoing at this time.

either the sump is located away from the postulated break locations or the sump is shielded from the turbulence created by the break flow patterns and containment spray drainage. For other cases, it must be carefully considered whether the flume can capture the flow patterns adequately. Some experimenters have used external means (e.g., water injection or mixers) to create conditions that provide a conservative representation of the conditions that might exist closer to the sump.

**Geometrical Features.** The head loss measured has been reported to be strongly dependent on the physical features of the sump screen (e.g., screen orientation) and the structures located in the close proximity (e.g., debris curbs). The experimenters should model these features carefully to judge their effectiveness.

#### **Known Variations in the Geometry**

Several variations to the setup shown in Figure 7-8(a) have been considered. In the CDI test setup shown in Figure 7-9(a) for the Zion and Millstone Unit 2 nuclear power plants was significantly different. The setup used in the KKB tests, shown in Figure 7-9(b), was somewhat similar to Figure 7-8(a). The CDI setup, a pie-shaped flume was used to simulate gradually accelerating flow as it approached the sump screen. The sump was basically a solid box with its left side open for flume flow into the sump; the bottom opening allows for connection to the pump. The open side of the sump was fitted with a representative sample of the actual sump screen from the Millstone Unit 2 plant. The sump screen was placed on a full-scale-height curb.

The flume experiments were closed-loop in nature. Several small pumps were used to circulate water through the test setup. These pumps took suction from the bottom of the sump and delivered it to a diffuser mounted above the tank. The diffuser was chosen to simulate water falling from the steam generator compartment into the water pool formed on the containment floor.

In the CDI tests, the tank and the flume were filled to 55-in. high (full-scale height), and pre-measured volumes of the debris were added uniformly across the pie-shaped flume cross-section. The debris was allowed to settle to the flume floor, and the pumps were turned on to the desired flow. Observations of the transport of the

debris on the floor and their accumulation on the screen were made. The experimenters also measured the head loss resulting from debris accumulation.

#### **7.2.3 Prototype Module Strainer Testing**

The replacement strainers installed or being considered for installation at the U.S. and European nuclear plants rely on complicated structural features to maximize the strainer surface area. Some use planar surfaces to maximize the available surface area within a selected spatial envelope to enhance the strainer's capacity to accommodate a large quantity of debris while simultaneously minimizing the hydrodynamic load impacts. Other design concepts intentionally introduce non-uniform flow distribution across the strainer's surface with the intent of directing the debris to accumulate preferentially in selected areas of the strainer. A feature of the nonlinear flow is that flow can be somewhat parallel to some of the strainer's complex surfaces, such that the flow tends to sweep debris from these surfaces into the strainer's debris traps, thereby keeping some of the strainer's surfaces relatively free of debris until the debris traps fill. Emerging PWR strainer designs may intend to take advantage of the preferential accumulation of debris toward the lower parts of the sump screen. Many vendors have recognized that it is impractical to simulate the head loss performance of such strainers using flat-plate strainers in the arrangements discussed above.

An alternative was to use a full-scale or near-full-scale strainer modules in the experiments and investigate debris build-up and head loss. Early examples of individual-module tests were (a) the PP&L-sponsored tests conducted at the Alden Research Laboratory, Inc. (ARL) and (b) the metallic insulation transport and strainer-clogging testing reported by STUK (see Figure 7-10). Since then, almost all of the strainer vendors and some of the plants have used this type of testing, either during strainer development or as part of strainer qualification before the strainer is installed at a plant. It generally is believed that individual-module testing is a *necessary and sufficient* experimental approach—*necessary* because, without the module tests, it is not possible to obtain directly applicable test data, and *sufficient* because the experimental approach sufficiently

### Millstone 2 Tank Test

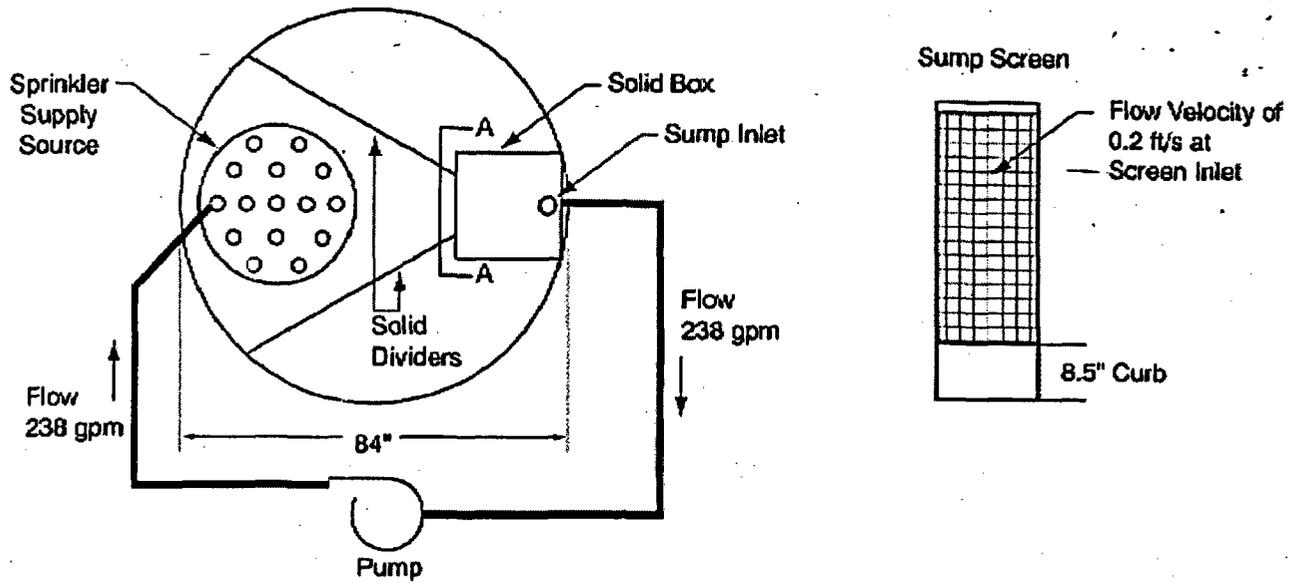


Figure 7-9(a) Flume Test Setup Used in the CDI Experiments for Millstone 2

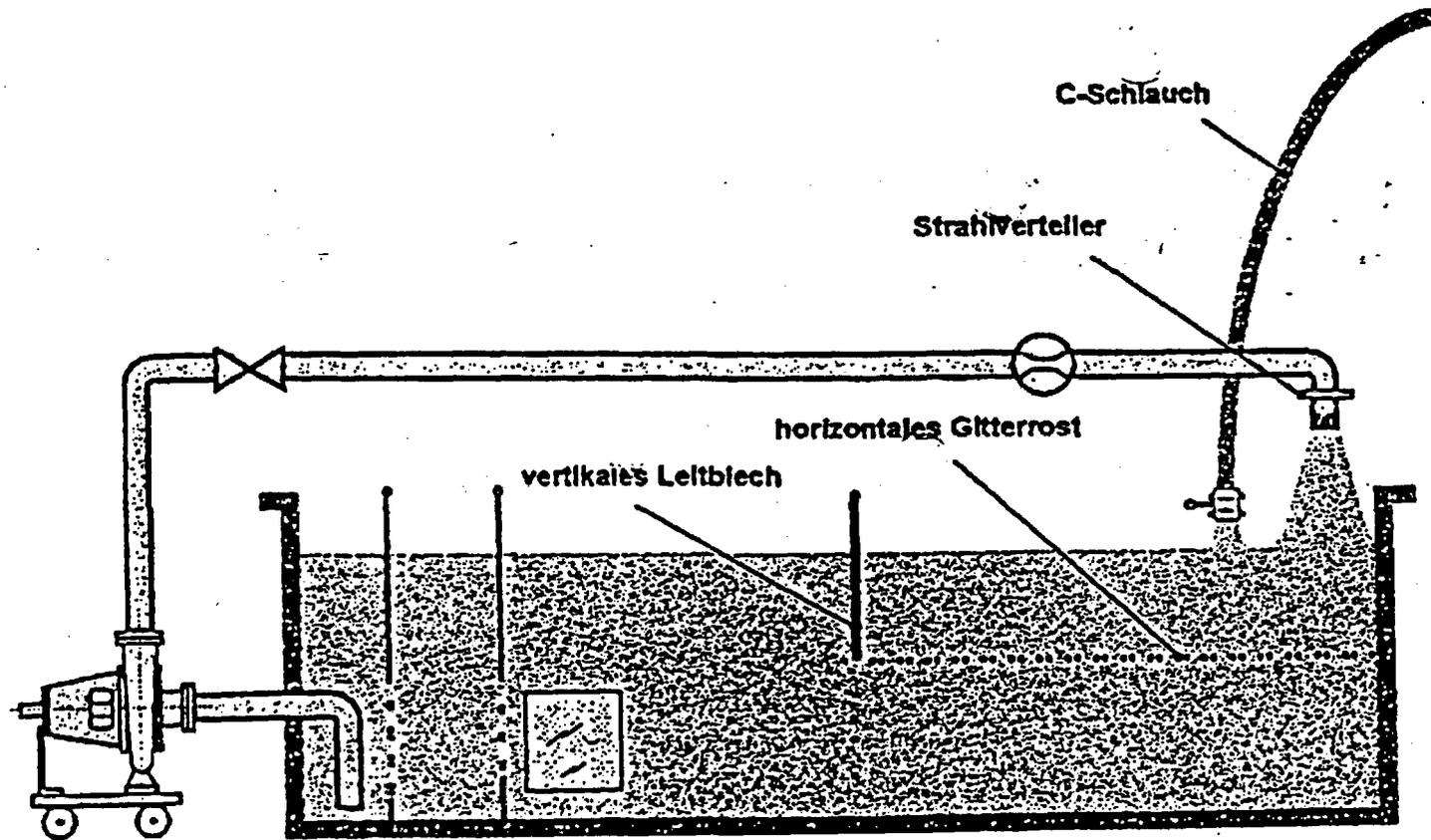


Figure 7-9(b) Test Setup Used for Transport and Head Loss Measurement in the KKB Plant-Specific Tests

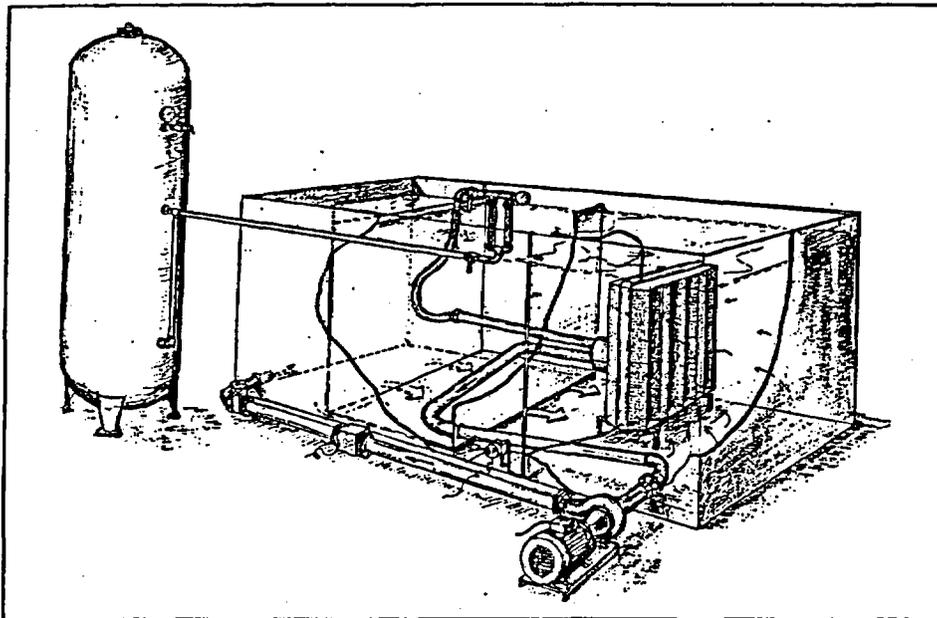
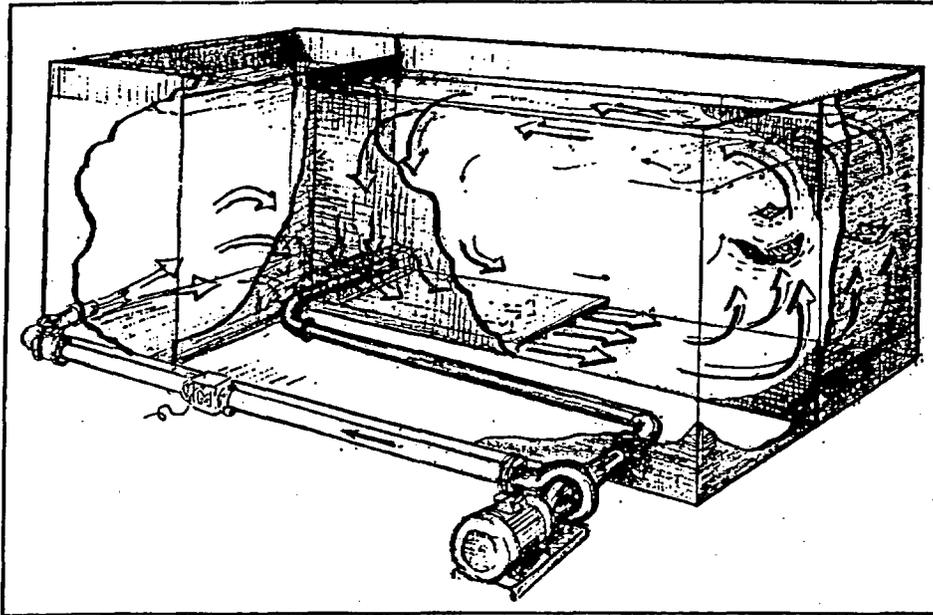


Figure 7-10 STUK RMI Head Loss Test Setup for Prototype Strainers

captures all the controlling phenomena. Although there are merits to this argument, it should be recognized that even prototype testing is associated with several non-prototypical conditions that have to be compensated for in the plant-specific analyses.

In the prototype tests, a strainer module (nearly 1:1 scale<sup>11</sup>) is used to measure and relate head loss across the strainer to the quantity of debris accumulated on the strainer and the flow rate through the strainer. The special emphasis of this type of testing is to assess the effect of special strainer design features (e.g., crevices or cavities) on the debris build-up and the associated head loss across the strainer.

This type of prototype testing was carried out by the following strainer developers/vendors:

- Performance Contracting, Inc., (U.S.)
- Vattenfall Utveckling, (Europe)
- ABB Nuclear Services (Europe),
- ABB/Combustion Engineering (U.S.),
- BWROG/General Electric Nuclear Services (U.S.),
- Enercon/Mark III BWROG (U.S.),

The following plant owners took part in strainer qualification before installation.

- Vattenfall Utveckling (Europe)
- LaSalle County Electric Station (U.S.)
- Limerick Generating Station (U.S.)

The following regulatory agencies used this approach while developing guidance.

- Finnish Center for Radiation and Nuclear Safety (STUK)
- Swedish Nuclear Power Inspectorate (SKI)
- U.S. Nuclear Regulatory Commission (BWROG/SER)

Figure 7-11 presents a schematic representation of the test setup used in the BWROG prototype testing, which is similar in concept to the setup used by STUK (see Figure 7-10). Typically, the strainer module is located in a large tank of water. Water flow through the strainer module is

maintained by recirculation pumps, which take suction through the strainer and discharge it to the tank. In some test setups, water discharge locations are located strategically to maximize turbulence in the tank such that the potential for debris settling in the tank is minimal. Other test setups use mechanical or manual means to ensure that almost all of the debris added to the tank would reach the strainer, and the minimal debris, if any, would settle out in the tank. Head loss across the strainer is monitored using a pressure transducer located downstream of the pipe flange connected to the strainer. Figure 7-12 plots head loss as a function of the strainer load measured in these tests.

There are a few variations to the test setup. In the STUK tests, the strainer surface area was oriented vertically. A similar approach was also reportedly used in the Vattenfall tests involving wall-mount-type strainer modules. The other Vattenfall tests located the strainer vertically on the floor. These finer differences may not have influenced the test data because the test objects were small compared with the pool size and the pool turbulence was sufficient to ensure that debris deposition was uniform. However, future investigators should pay close attention to such details.

Adding a predetermined quantity of debris to the tank commences a typical test.<sup>12</sup> The debris would be transported to the strainer gradually, as water is being circulated through the strainer. The transient response of the pressure transducers was tracked to determine the onset of steady state. In most cases, several pool turnovers were necessary to reach steady state. Even an hour into the test, it could be seen that a noticeable fraction of the debris would still remain either entrained in the strong eddies or settled out in the localized regions of the tank where flow turbulence was low. Some investigators used manual means to guide the remaining debris towards the screen. After the steady-state head loss was measured, investigators did one of the following.

<sup>11</sup>If the tests are not close to full-scale, non-prototypic edge effects could affect the head loss data in a manner similar but potentially different from the flat-plate peripheral gap effect.

<sup>12</sup>Most U.S. tests added sludge first to the test tank and circulated water through the tank at relatively high velocities to ensure that it is well mixed with the water. Other debris was then added to the tank, sequentially as necessary.

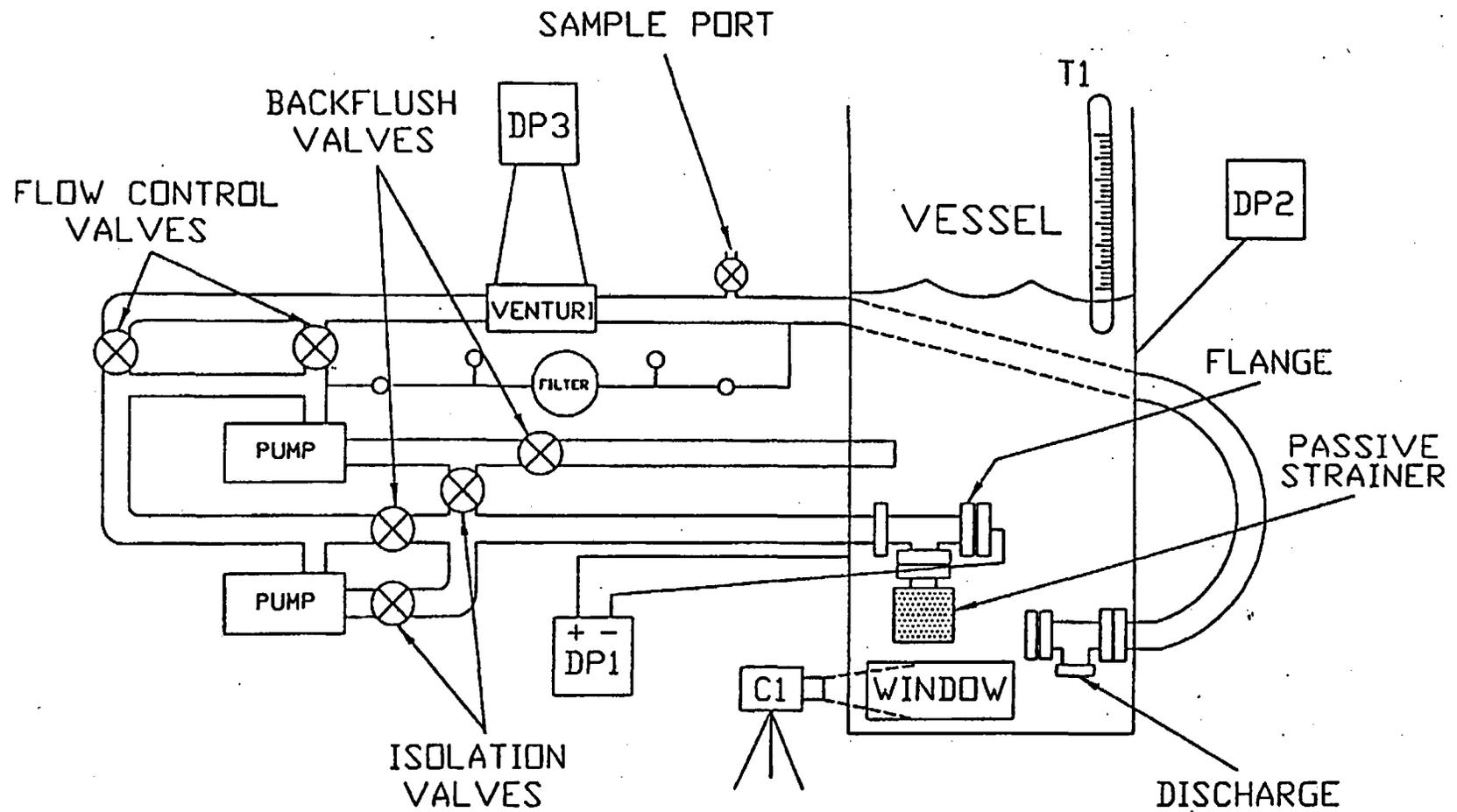


Figure 7-11 BWROG Prototype Strainer Module Test Setup

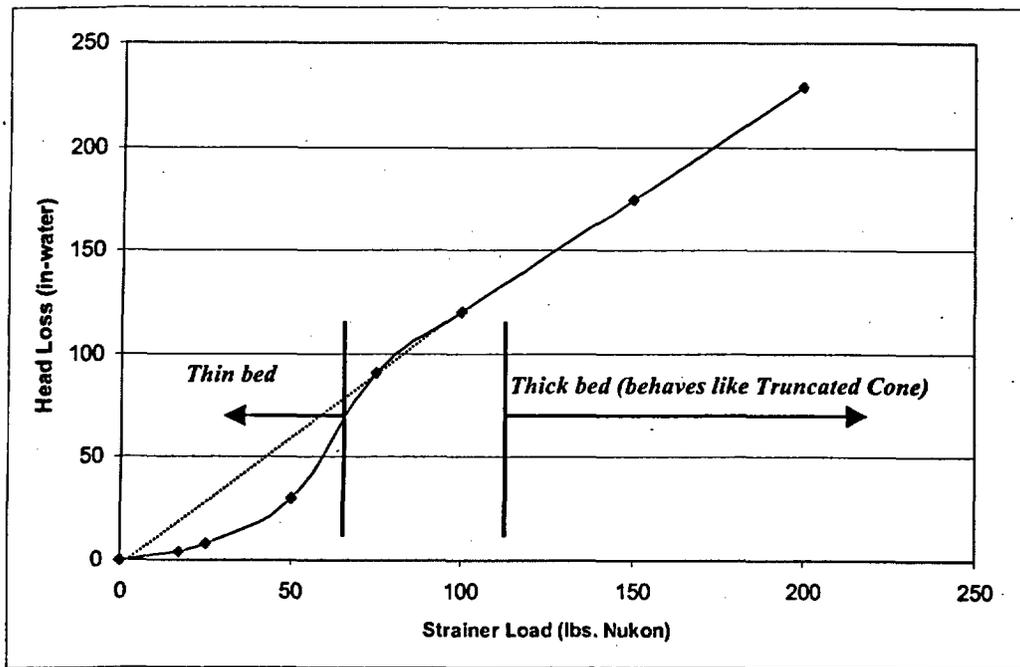


Figure 7-12 Measured Head Loss as Function of Strainer Debris Loading for Specialty Strainers

1. Terminated the test and moved on to the next test, which involved repeating the test at different debris loadings.
2. Added additional debris to the tank and repeated the entire test procedure to measure head loss at a higher debris loading.
3. Varied the flow through the strainer over a pre-set limit to measure head loss at different flow rates.

The primary advantages of prototype module testing are:

1. Prototype-strainer-module testing is the only option available for measuring and correlating clean-strainer head losses for many of the advanced designs. Some of these strainers incorporate advanced flow-control devices (e.g., vanes, ribs, channels, etc.) to distribute the flow more uniformly across the entire strainer surface area. Although several attempts have been made by various vendors to compute clean-

strainer head losses theoretically, they could not be used in the plant-specific analyses due to the large uncertainties.

2. Prototype-strainer-module testing is the only option available for examining how the debris would build up on the strainer surface and the effect it would have on the head loss. It also sheds light on how debris is distributed on the strainer surface at low and moderate loadings.
3. Because the strainer models used are actual size, the test data would not have to be corrected for non-prototypical aspects such as the bypass flow.

The primary shortcomings of prototype tests are listed below.

1. Because of the large water volume, the conduct of these tests is limited to ambient temperatures rather than the elevated suppression-pool/sump water temperatures. Non-prototypical temperatures must be corrected for. In some cases, correcting for

temperature effects is straightforward (e.g., compensate for the viscosity effect). However, there are special cases in which temperature correction is difficult. For example, it is not easy to correct for temperature effects if the strainer design is such that the circumscribed velocity is in the turbulent range and the plate velocity is in the laminar region. Similarly, if the debris type has special chemical reactions at elevated temperatures, a simple viscosity correction is not sufficient.

2. Large volumes of water and large surface areas also limit the number of tests that can be conducted, because it costs more to clean the test facility between each test and it costs more to refurbish insulation. In practical terms, this may have a serious effect because it limits how much understanding one can gain from such tests. This also forced past investigators to optimize the test conduct such that a single test could be used to derive head loss data for several operating conditions. This factor alone contributed to significant variability in the reported data.
3. It is almost impossible to measure precisely what fraction of the debris dropped in the tank actually reached the strainer surface. Past experience has shown that debris has a tendency to settle out in the corners of the tank. One could argue that the quantity of debris that settles out is very small compared to the quantity accumulated on the strainer.
4. The test program (at least in the traditional way that the results are applied in the plant-specific analyses) presupposes that the quantity of debris expected to accumulate on each strainer module and the sequence in which the debris accumulates are known, and that this sequence can be reproduced in the testing. This assumption can introduce uncertainties in the use of the test results because the debris arrival sequence derived from analyses would also be uncertain.
5. The flow patterns and turbulence levels encountered in the tank tests may not resemble the actual plant conditions, and thus conclusions drawn from the prototype testing regarding saturation quantities may not be accurate.
6. Repeatability testing should be conducted. Past repeatability of prototype strainer module tests has indicated substantial uncertainty in the head loss data for some

test conditions that should be factored into plant-specific analyses whenever such conditions are indicated by testing.

7. The transient head loss traces obtained from these tests are not expected to be representative of the actual plant application. One reason for this is that the pool turnover time in the prototype tests is significantly different from that in a plant. Even if the pool turnover time is the same, there is no assurance that the debris accumulation rate in the prototype tests would be representative of that in the plant. This point is particularly important for licensees that opt to take credit for ECCS throttling as part of their analyses.
8. Past experience has shown that reaching a true steady state head loss would take several hours to days, depending on the type of insulation and the flow velocities. Many tests were terminated when the head loss traces became fairly flat and the majority of the debris in the tank had accumulated on the strainer. Limited long-term testing (over days) has indicated that head loss increases slowly. This long-term behavior was believed (but not verified) to be due to debris bed decomposition that leads to more compact beds. Future investigators will have to deal with these considerations, as well. Therefore, it is important to note that this deficiency exists and correct for it through either the use of separate-effects testing or other defensible means (e.g., BWROG URG description).

#### **Important Considerations for Future Experimenters**

As previously discussed, the prototype-module tests are a necessary set of tests that must be conducted as part of the design or qualification process. However, it is questionable whether they are a sufficient set of tests. Evidently, the best option for experimenters appears to be (a) to conduct an abbreviated set of prototype-module tests to extract a sufficient amount of information, (b) augment that information using test data from the separate-effects tests, and (c) apply the data judiciously in the plant-specific analyses. Careful attention should be paid to the fact that although prototype-module tests appear to be "prototype tests," they have numerous non-prototypical features that must be addressed in the plant analyses.

During planning for prototype tests, attention should be paid to the insights gained from past experience, listed below:

1. Many vendors have recognized that the special strainers are not a "one-size-fits-all" type of standardized strainer. Instead, the concept is to use similarly designed strainer modules of various sizes and quantities as necessary for each plant. The technical method adopted by the vendors has been to use the prototype test data to develop a correlation, either empirical or semi-theoretical, and use it in the plant-specific analyses. For this method to be successful, particular attention should be paid to the process used to select the dimensions of the strainer being tested, the experimental parameter range (i.e., debris loading range and flow rate range) over which testing is being carried out, and the form of the correlation used to relate head loss to debris loading and flow rate. The correlation development should sufficiently address the factors discussed in Section 7.3.2 (i.e. special shapes of the strainers and as a result variations in the approach velocity).
2. The experimental results suggest that head loss across the specialty strainer is a nonlinear function of debris loading. Figure 7-12 presents an approximate representation of measured head loss as a function of strainer debris loading for a typical stacked-disk strainer. Specialty strainers are designed such that they would have a gap or crevice where debris would initially accumulate preferentially when the debris loading is light. The debris accumulated in these gaps would be subjected to lower fluid velocities and hence would result in lower head loss. After these gaps are filled, debris would start to accumulate on the circumscribed surface of the strainer, which resembles a regular-shaped strainer (cylindrical in the case of a stacked-disk strainer). In view of this complex relationship between head loss and debris loading, special attention should be paid to collecting head loss data over a wide range of debris loadings and to judging the applicability of test data to a plant application carefully.
3. The prototype module should be designed to ensure that it accurately represents the internal flow control devices (e.g., ribs and vanes). Testing has shown that these

geometrical features primarily control head loss across the clean strainer.

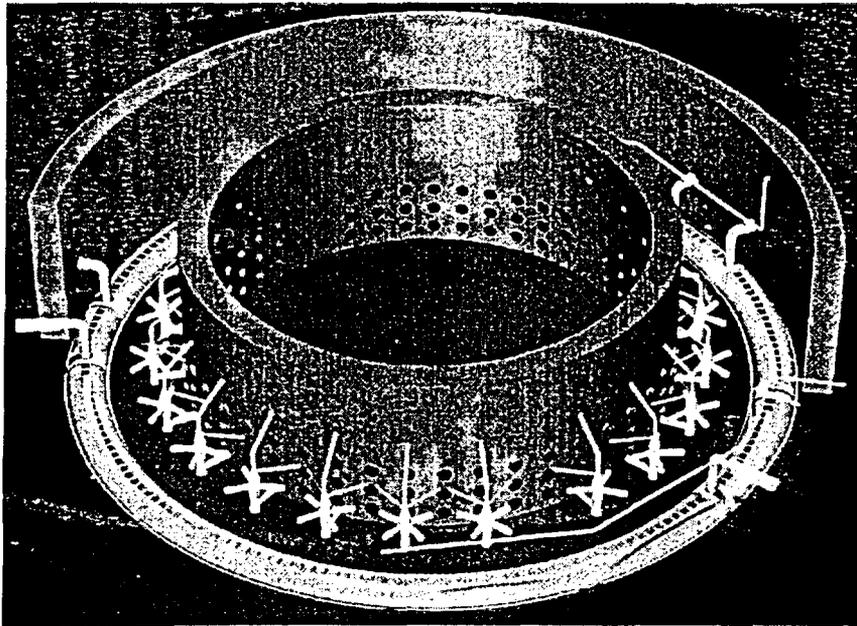
4. The measured head losses are a strong function of the sequence over which debris is introduced. There is considerable evidence that the introduction of RMI first, followed by fibrous debris, would maximize the head loss. In those tests, it appeared that RMI would fill up the interstitial gaps and cause fiber to accumulate on the strainer circumscribed surface. This mode of accumulation was found to result in the largest head loss compared with the other alternatives (e.g., fiber is added first followed by RMI or fiber and RMI are added together). However, this issue is only important if the test (and the plant application) involves significant quantities of both RMI and fibrous debris.

#### **Known Variations in the Geometry**

All prototype modular strainer tests used setups very similar to those shown in Figures 7-10 and 7-11. A few differences exist in the details of the test setup. In particular, the methods used to create the turbulence necessary to ensure that debris would not settle out in the test tank varied considerably. Other differences are related to the orientation of the strainer assembly and the test procedures. However, these variations most likely would not have a significant effect on the head loss.

#### **7.2.4 Semi-Scale Installed Strainer Testing**

As discussed above, the prototype modular tests de-emphasize the debris transport aspect by ensuring that all the debris would stay in suspension and ultimately reach the strainer. Application of the test data in the plant-specific analyses would require that the analyst have prior knowledge of the quantity and type of debris that would accumulate on each strainer module. A majority of the licensees relied on simplifying assumptions (e.g., equal distribution of debris on all strainers) to estimate the quantity of debris that might accumulate on each strainer. Other licensees have sought experimental means for predicting debris deposition by conducting semi-scaled, as-installed strainer tests. Figure 7-13 provides a schematic of the test setup used in the quarter-scale tests conducted by Grand Gulf generating station. These plants installed quarter-scale strainers, replicated to the exact details, in the quarter-scale suppression pool equipped with



**Figure 7-13 Semi-Scale Test Facility Used in Grand Gulf Quarter-Scale Testing**

quarter-scale pumps and other geometrical features. The concept was to study debris build-up on strainers when they are subjected to prototype conditions. These plants also examined the head loss performance characteristics of individual modules simultaneously. Figure 7-14 shows the geometrical details of the individual modules tested. This comparison was used to draw conclusions regarding the applicability of individual module test data in the plant-specific analyses and the issues that should be factored into plant-specific analyses. These tests provide valuable insights on how to use individual module test data in the plant-specific analyses, at least for some debris types.

### **7.3 Analysis of Test Data**

#### **7.3.1 United States Nuclear Regulatory Commission Characterization of Head Loss Data**

##### **7.3.1.1 Fiberglass and Particulate Debris**

The U.S. NRC characterization of head loss caused by fibrous and particulate debris is described in detail in Appendix A of the CSNI knowledge-base report<sup>7-1</sup> and Appendix B of NUREG/CR-6224.<sup>7-2</sup> This correlation was

validated by comparing its predictions for head loss with experimental data from the following sources:

1. NRC experimental data obtained as part of BWR study (NUREG/CR-6224)<sup>7-2</sup>
2. PP&L head loss data base
3. PCI head loss data base
4. NUREG/CR-2982 head loss data base
5. Vattenfall Development Co. data base
6. BWROG head loss data base for truncated-cone strainers
7. BWROG head loss data from gravity-head loss tests

As shown in Appendix A of the CSNI knowledge-base report,<sup>7-1</sup> the correlation predictions were within  $\pm 25\%$  of the test data. NUREG/CR-6224, Appendix B,<sup>7-2</sup> provides the limitations of the correlation, as well as some of the assumptions associated with its applications. This experimental correlation was incorporated into the Blockage computer code.<sup>7-25,7-26</sup>

##### **7.3.1.2 Reflective Metallic Insulation**

Conclusions regarding RMI head loss are based on a review of the following sources of experimental data.

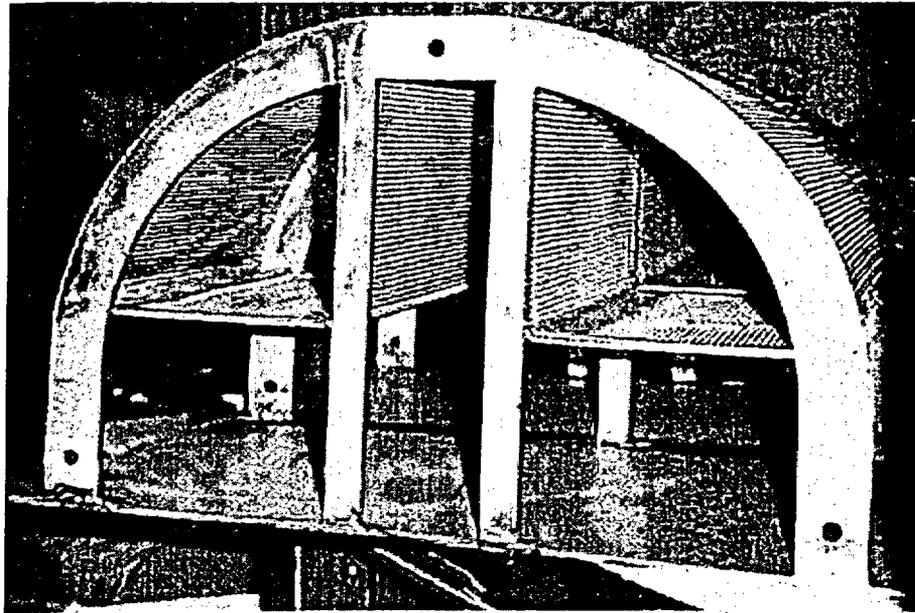


Figure 7-14 Prototype Strainer Module Test Setup Used in Grand Gulf Prototype Tests

- NRC/ARL Test Data:** ARL conducted a series of tests under U.S. NRC sponsorship to examine the head loss resulting from the accumulation of RMI, fibrous and sludge debris. These tests used a small section of an ECCS strainer (a diameter of 1 ft) assembled in a vertical test section. The RMI debris was obtained directly from the steam blast tests. The results of the test program, along with a description of the test facility, were provided in References 7-8 and 7-9.
- BWROG/URG Test Data:** The BWROG conducted a series of tests at the Electric Power Research Institute (EPRI) Non Destructive Evaluation (NDE) center in Charlotte, North Carolina, employing full-scale strainers to measure the head loss resulting from the accumulation of RMI, fibrous, and sludge debris. Of particular interest are the tests conducted using a truncated-cone strainer. In these tests, the RMI debris was fabricated manually—basically crumpled to look very similar to the RMI debris used in the ARL tests. The results of the test program were provided in the BWROG URG, Volume 2.<sup>7-10</sup>
- LaSalle Test Data:** In 1998, ComEd sponsored a series of plant-specific tests to study the head loss resulting from 1.5-mil aluminum RMI and Nukon fiberglass insulation. These experiments were conducted using the same test facility as the BWROG. The strainer used in the experiments was a stacked-disk strainer.<sup>7-13</sup>
- STUK-94 Test Data:** The STUK experiments were conducted on a large strainer immersed in water (see Figure 7-10). Debris was simulated by “flat” metallic insulation inner foils cut into pieces of various sizes, ranging from 2 to 130 cm.<sup>7-6,7-16</sup>

Review of this data suggests that head loss caused by RMI debris is very sensitive to the shape of the debris used in the experiments. Much of the RMI debris used in U.S. testing is crumpled pieces of 2.5-mil-thick stainless steel foils (except for the LaSalle data, which used aluminum foils). An example of RMI debris generated by steam break flow is shown in Figure 3-8. Visual examination of the beds suggests that crumpled RMI fragments accumulate with their major cross-section aligned perpendicular to the flow direction. It is also apparent that crumpled debris beds tended to be relatively uniform (volumetrically and planar) and typically have much larger porosity.

The beds formed of smaller debris tended to be more compact than the beds formed of the larger debris; the most compact debris bed was observed when fragments ranging in size from ½ in. to 4 in. were allowed to accumulate randomly on the strainer surface. Head loss data for such beds is reported by the following research organizations:

- NRC Test Data obtained at ARL<sup>7-8,7-9</sup>
- BWROG Test Data<sup>7-10</sup>
- GE Test Data (Proprietary)<sup>7-12</sup>
- LaSalle Test Data<sup>7-13</sup>
- PCI Test Data<sup>7-11</sup>
- KEFER Test Data

Finnish investigators used regularly cut, flat RMI pieces to simulate debris in the head loss tests. The rationale for use of flat pieces were:

1. The debris generation process could include the destruction of an RMI cassette where a significant portion of the cassette insulation becomes large relative flat pieces of foil.
2. Although RMI debris may be crumpled initially, it would be flattened as the debris is transported through the drywell and the wetwell.
3. The flatter RMI pieces typically would result in higher head losses and therefore provide a conservative alternative to the crumpled pieces.

The beds formed of flat RMI pieces behave fundamentally differently from the beds formed of crumpled pieces. The dimples, the bowing (either due to damage or initial curvature) of the relatively flat foils, and a certain randomness of accumulation would separate the adjacent foils in flat-foil debris beds resulting relatively compact beds of RMI debris. The pressure-drop characteristics of flat RMI debris are described by the STUK investigators.<sup>7-8,7-16</sup>

Based on these analytical observations, LANL reasoned that the head loss across RMI beds is a function of debris loading (the ratio of foil surface area to strainer surface area), flow velocity through the debris, and the type, shape, and size of the debris. Figure 7-15 is an idealized view of flow through an RMI bed formed of debris size L, and an inter-foil distance of  $K_f$ .<sup>13</sup>

<sup>13</sup> A realistic RMI debris, that would include crumpled pieces as well as flat foils, would be much more chaotic than the idealized diagram indicates. The

For such a flow configuration, head loss can be estimated to be

$$\Delta P \propto \frac{S_v(1-\epsilon)}{\epsilon^2} \rho U^2 N \propto \frac{L^2}{K_f^2} U^2 (A_{foil} / A_{str})$$

using the following variables.<sup>14</sup>

- Inter-foil channel gap thickness ( $K_f$ )
- Fluid velocity ( $U$ )
- Characteristic foil dimension ( $L$ )
- Foil specific surface area ( $S_v$ )
- Number of foil layers in bed ( $N$ )
- Foil surface area ( $A_{foil}$ )
- Strainer surface area for deposition ( $A_{strainer}$ )
- Fluid density ( $\rho$ )

For debris beds consisting of smaller debris (typically 2- to 4-in. sized pieces of debris), the head loss relationship was refined based on the experimental data.

$$\Delta H = \frac{1.56 \times 10^{-5}}{K_f^2} U^2 (A_{foil} / A_{str})$$

where

- $\Delta H$  is the head loss across the RMI bed (ft-water),
- $U$  is the water velocity through the bed (ft/s),
- $A_{foil}$  is the surface area of the RMI foils (ft<sup>2</sup> - nominal),
- $A_{str}$  is the strainer cross-sectional area (ft<sup>2</sup>), and
- $K_f$  is the inter-foil gap thickness (ft).

The inter-foil thickness was deduced from the experimental head loss data for different debris types. Nominal values for  $K_f$  are summarized in Table 7-2.

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idealized approach was applied to the chaotic bed with the non-idealized geometry integrated into the variable  $K_f$ . Thus,  $k_f$  represents an effective gap width, which had to be deduced from test data rather than simply measured.

<sup>14</sup> As a potential alternative, it should be noted that the Finnish researchers (Reference 7-16) correlated data based on the linear ratio of  $L/K_f$ , rather than its square. The researchers claim a good correlation for their RMI debris in a tube experiment once the edge effects were considered.

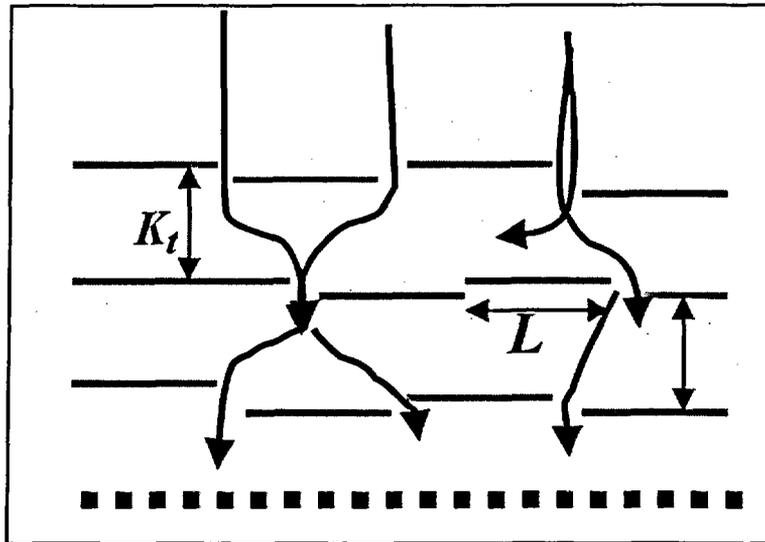


Figure 7-15 Idealized View of Flow Through an RMI Bed

Foil Type and Bed Type	Basis	$K_t$ (ft)
2.5-mil S/S (NRC large pieces)	ARL test report provided measured values	0.014
2.5-mil S/S (NRC small pieces)	ARL test report provided measured values	0.010
1.5-mil Al (debris bed)	ComEd test report	0.008
1.5-mil Al (debris bed)	ComEd test report	0.006
2.5-mil S/S (STUK flat pieces)	Deduced from STUK 1994 test report*	0.007
2.5-mil S/S (1-mm dimple)	Deduced from STUK 1994 test report**	0.003

\*This deduction explained in this subsection under subtitle "STUK-1994 Test Data."  
 \*\*The ARL tests were conducted at the same time as the BWROG test program described herein as being undertaken. The objective was not to develop a head loss correlation; but to independently verify insights provided by the BWROG test program using large strainers. These tests were envisioned from the beginning to be "separate-effects" tests.

For certain insulation types and head losses, the  $K_t$  values were observed to change with the head loss as the beds became compressed. Such changes in  $K_t$  values were accounted for in some of the evaluations reported below.

**U.S. Nuclear Regulatory Commission/Alden Research Laboratory Tests**

In 1996, NRC sponsored a series of tests at ARL to measure the head loss caused by the accumulation of RMI debris on a BWR strainer, with and without the simultaneous presence of fibrous insulation and sludge.<sup>15</sup> These tests use

<sup>15</sup>The ARL tests were conducted at the same time as the BWROG test program described herein as

the vertical head loss test facility shown in Figure 7-6.

The RMI debris used in the testing was generated directly from the steam-blast tests conducted by NRC at Karlstein, Germany<sup>7-8</sup> (debris shown in Figures 3-8). For debris fragments smaller than about 4-in., the debris beds were very uniform. Figure 7-16 provides a comparison of the correlation, immediately

being undertaken. The objective was not to develop a head loss correlation; but to independently verify insights provided by the BWROG test program using large strainers. These tests were envisioned from the beginning to be "separate-effects" tests.

above, (identified as Equation K.5a in the figure) with the test data obtained for RMI debris. As evident from this figure, the NRC correlation provides a reasonably conservative estimate for the test debris and test conditions, highlighted by the fact that only a single data point is above the correlation but that data point is still within the uncertainty band. Note that ARL deduced the values for the variable  $K_1$  from head loss data that are reported in Table 7-2 and these values were used in the correlation to develop the curve shown in Figure 7-16.

#### **Boiling Water Reactor Owners' Group Tests**

As part of BWR strainer blockage resolution research, the BWROG performed a series of tests to measure the head loss caused by RMI debris on "prototypical" pre-NRCB 96-03 ECCS strainers (i.e., truncated-cone strainers) and the replacement strainers (e.g., stacked-disk strainers). In these experiments, RMI debris was added to a large, turbulent pool of water and allowed to approach and accumulate on a full-scale strainer. The accumulation occurred over a period of about 1 h in some experiments, with the pressure drop gradually increasing until a plateau in the data was reached. The measured head loss was then tabulated as a function of the flow through the strainer and the amount of debris added to the pool. Visual examination confirmed that in many cases, a majority of the RMI debris added to the pool actually reached the strainer, resulting in the formation of relatively thick RMI debris beds. In Tests T3 through T6, the RMI debris loading varied between  $7 \text{ ft}^2\text{-foil}/\text{ft}^2\text{-strainer}$  to  $40 \text{ ft}^2\text{-foil}/\text{ft}^2\text{-strainer}$ , and the beds were fairly uniform. The debris used in these tests closely resembled (at least visually) the NRC/ARL debris (refer to Figure 3-8). The resultant head losses are plotted in Figure 7-17 as head loss normalized to circumscribed thickness vs the approach velocity. Also shown in Figure 7-17 are the head loss predictions obtained using the NRC correlation presented and discussed above. The agreement between the head loss data and the correlation is well within the experimental uncertainties and the correlation error margin. Once again,  $K_1$  values were deduced from the head loss data and these values were used in the correlation to develop the curve shown in Figure 7-17.

The BWROG also obtained head loss data for stacked-disk strainers and star strainers.

However, all those data were obtained for low debris loadings. Hence, no effort was made to compare the NRC head loss correlation with the data for these special-shaped strainers. Similarly, the BWROG database included head loss data for mixed beds consisting of RMI and fibrous debris. The NRC regulatory position was found to bound all such data.

#### **LaSalle Tests**

In 1998, ComEd sponsored a series of plant-specific tests<sup>7-13</sup> to study the head loss resulting from 1.5-mil aluminum RMI and Nukon fiberglass insulation. These experiments were conducted using the same test facility that was used for the BWROG tests and the strainer tested was a stacked-disk strainer. Table 7-3 provides the geometric details of the strainer used in the testing.

Six tests were conducted in which the flow rates varied between 2000 and 5000 gpm and the RMI debris loading reached as high as  $2250 \text{ ft}^2$  of foil (or a value of  $144 A_{\text{foil}}/A_{\text{circ}}$ ). In all tests, the RMI fragments used were crumpled pieces with a dominant length scale less than 2 in., so very compact beds would be expected. The measured head loss was tabulated as a function of the flow rate through the strainer and the quantity of insulation debris added to the pool. The report contained references to visual observations regarding the fraction of the debris that actually reached the strainer in each test. It also provided pictorial evidence of debris-bed build-up on the strainer, both for RMI and mixed beds.

Tests 2 and 4 examined pure RMI debris build-up on the strainer surface. In Test 2, RMI debris was added incrementally over a long duration (the test lasted 7.5 h). In both of these tests, a total of  $2250 \text{ ft}^2$  of RMI foil was added to the pool and allowed to accumulate on the strainer. In Test 4, all of the RMI debris was added instantaneously and then allowed to accumulate on the strainer. From the head loss traces, it appears that accumulation occurred over a period of about the first 3 h, with head loss reaching the steady-state value near the end of the test. The head loss data measured in Tests 2 and 4 are presented in Figure 7-18. Figure 7-18 also provides a comparison of the head loss predictions obtained using the LANL RMI head loss correlation with the test data from

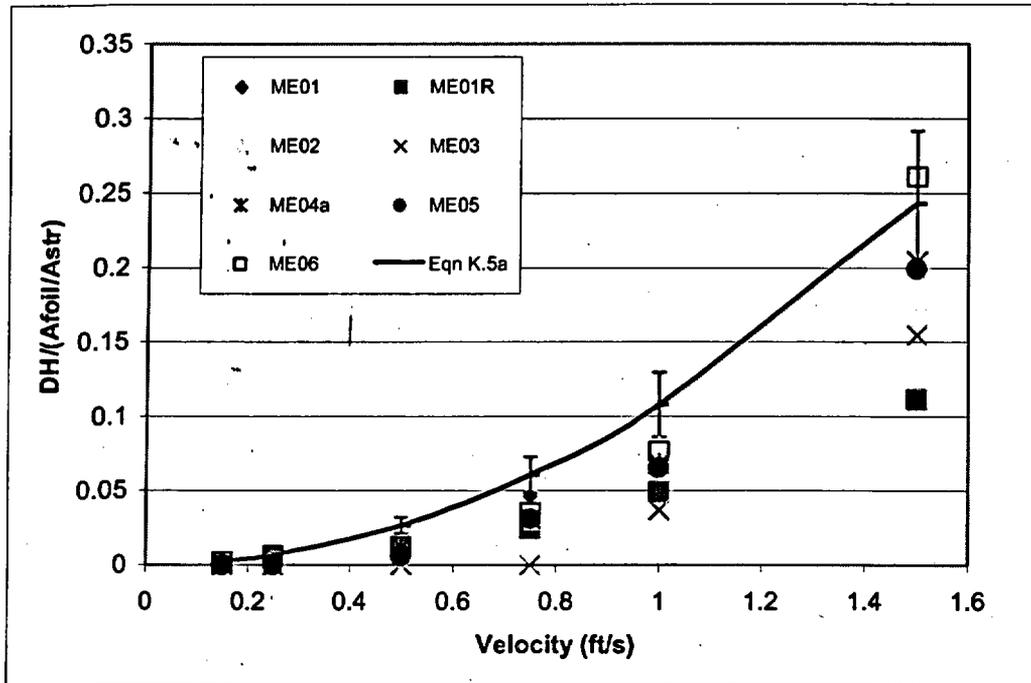


Figure 7-16 Comparison of NRC/ARL Test Data with LANL Correlation

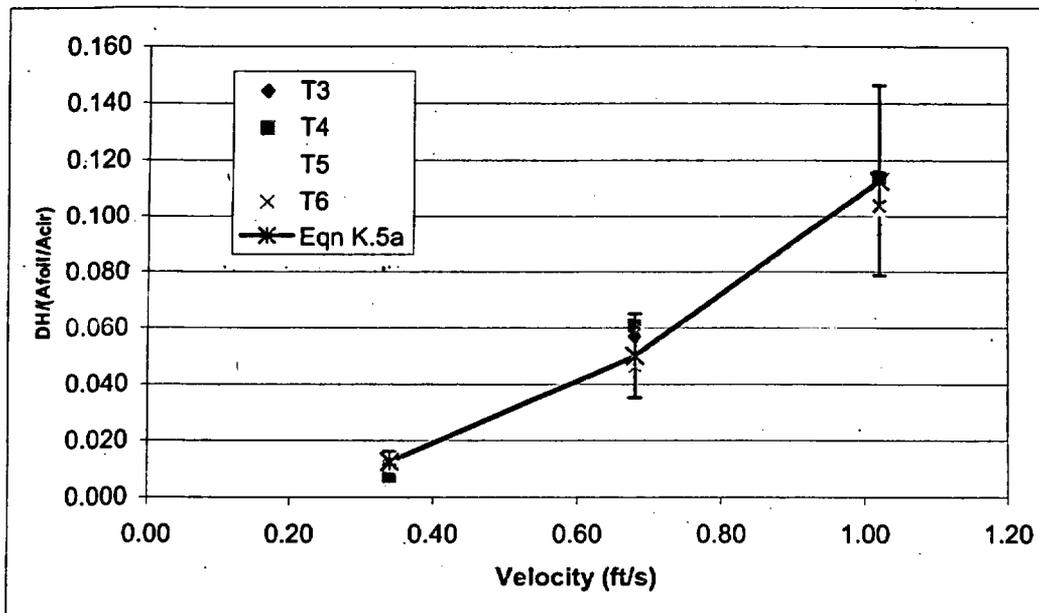


Figure 7-17 Comparison of BWROG Test Data for Truncated Cone Strainer with LANL RMI Correlation

<b>Table 7-3 Geometric Details of the Portion of the Strainer Tested in the LaSalle Test Program</b>	
<b>Strainer Geometry Details (Half Strainer Effective)</b>	
Number of Discs	6
Number of Gaps	6
Inner Diameter (in)	26
Outer Diameter (in)	34
Disc thickness (in)	1.5
Gap Thickness (in)	2
Length of Strainer (in)	21
<b>Derived Geometry Variables (Half Strainer Effective)</b>	
Total Flow Area (ft <sup>2</sup> )	48.6
BWROG Circumscribed Area (ft <sup>2</sup> )	15.6
Circumscribed Area + Area of Discs (ft <sup>2</sup> )	21.9
Gap Volume (ft <sup>3</sup> )	2.6

Tests 2 and 4. The correlation predictions were within  $\pm 30\%$  of the test data. The correlation predictions were consistently less than Test 2 data and consistently higher than Test 4 data. Note that the  $K_t$  values used to generate the predictions shown in Figure 7-18 were reported in Reference 7-13 by the investigators.

#### STUK-1994 Test Data

In 1994, the Finnish Nuclear Authority (STUK) performed a series of tests to measure the head loss caused by the accumulation of RMI debris.<sup>7-6,7-15,7-16</sup> In these tests, relatively flat pieces of RMI foil were used to simulate debris. Figure 7-19 provides a comparison of LANL RMI predictions with STUK head loss data. The comparison benefited from the compression data provided by the STUK investigators. The comparison shows that the predicted head losses are comparable ( $\pm 30\%$ ) to correlation predictions. However, the following limitations of the correlation apply (when applied to the debris beds similar to the debris used in the STUK experiments):

1. The comparison shown in Figure 7-19 was based on test data obtained for small fragments (or pieces).
2. The  $K_t$  values used in the comparison were deduced from interpretation of data presented in Reference 7-16. In this reference, the investigators measured and reported debris bed thickness as a function of the head loss across the bed. This data was used to derive a value for  $K_t$  (provided

in Table 7-2) by inserting the test data into the LANL head loss correlation and solving for  $K_t$ .

Although the correlation appears to perform well in predicting head loss caused by the small flat pieces of debris used in the STUK experiments, the original investigators expressed reservations regarding the applicability of the correlation. So it is recommended that this correlation be used cautiously when applied to flat pieces.

#### 7.3.2 Analysis of Non-Flat-Plate Strainer Data

The purpose of this section is to demonstrate the means by which the NUREG/CR-6224 correlation<sup>7-2</sup> can be adapted for non-flat-plate strainers (e.g., stacked-disk strainers). The NUREG/CR-6224 head loss correlation was developed based on experimental data obtained for flat-plate and truncated-cone strainers. The stacked-disk strainers are a type of passive strainer now used extensively in the U.S. BWR nuclear power plants. This section:

1. Establishes that flat-plate-strainer data, if applied correctly, can adequately predict the head loss performance of more complex strainers and
2. Highlights a list of parameters that should be considered carefully while evaluating the performance of advanced strainer designs (e.g., gap volume vs debris volume and circumscribed area vs plate area).

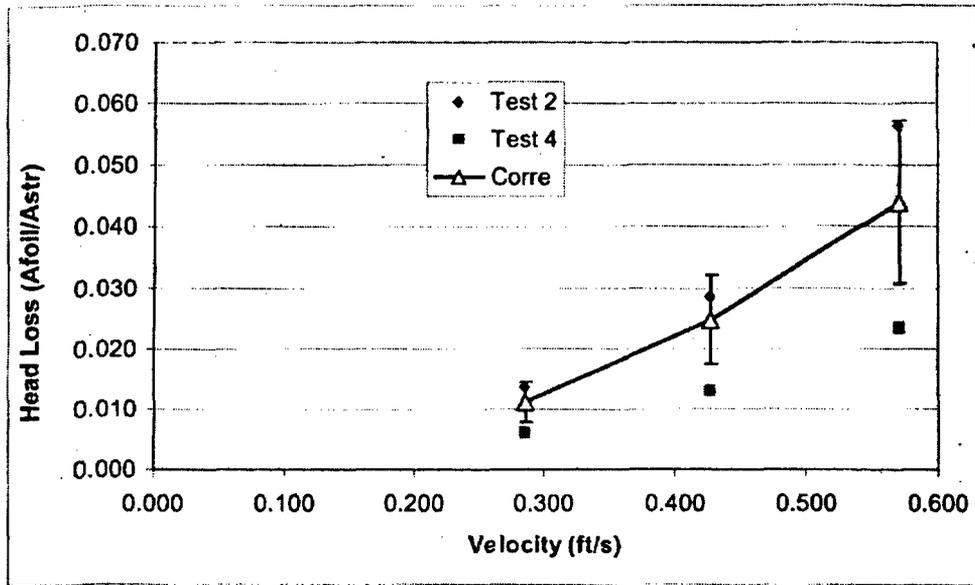


Figure 7-18 Comparison of LANL RMI Correlation Predictions for Truncated Cone Strainer with the Experimental Data Obtained from LaSalle Tests

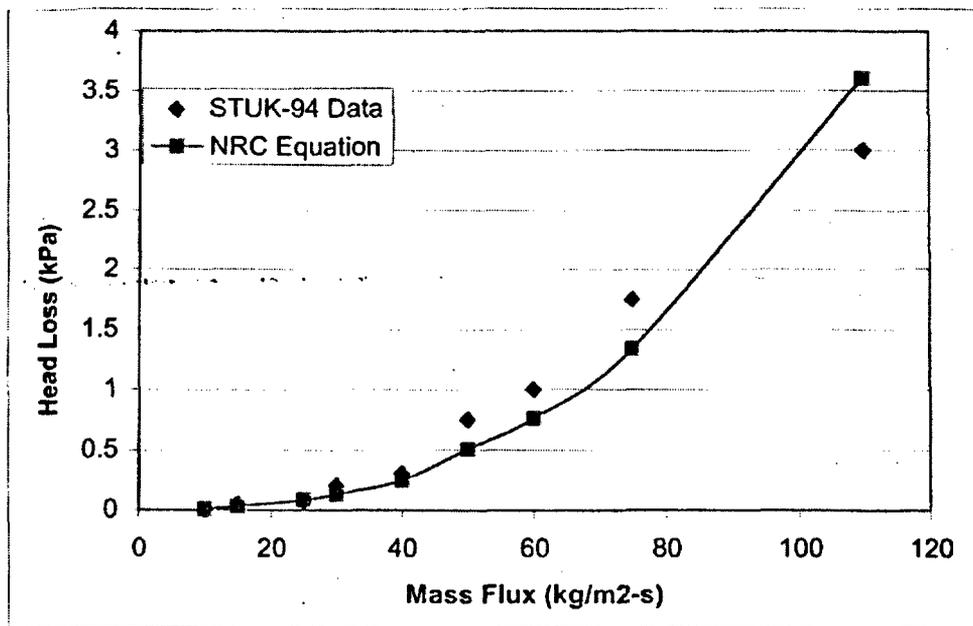


Figure 7-19 Comparison of LANL RMI Predictions with the STUK Head Loss Data

### 7.3.2.1 Phenomena of Debris Build-Up on Stacked-Disk Strainers

The basic idea of stacked-disk strainers is to maximize the perforated plate area for a given projected size of the strainer.<sup>16</sup> The head loss caused by these strainers is controlled significantly by such factors as the gap volume, the plate surface area, and the change in deposition area with debris loading. The importance of these factors can be understood by considering the schematic presented in Figure 7-20, which illustrates the debris build-up on a stacked-disk strainer.

Initially, the debris would accumulate on the strainer plate surface nearly uniformly. At this extreme, the strainer surface area available for deposition would be very close to the total perforated plate area. Thus, models should be able to predict head loss at this stage by treating the strainer as a flat plate with a flow area equal to the total plate area. The flow velocity and bed thickness would be

$$V_{\text{thin-bed}} = Q \text{ (ft}^3\text{/s)}/A_{\text{plate}}$$

$$t_{\text{thin-bed}} = M_{\text{fiber}}/(\rho_f \cdot A_{\text{plate}})$$

The resulting head loss can be calculated using the NUREG/CR-6224 correlation or a similar correlation based on a flat-plate strainer by computing the bed thickness assuming that debris builds up on the entire plate area and by computing the fluid velocity based on the plate area.

The other extreme condition would be when large volumes of debris have accumulated such that the gap volumes were completely filled with the remaining debris deposited on the circumscribed area of the strainer. For the portion of the debris that accumulates on the circumscribed area, the NUREG/CR-6224 correlation can be used with the flow velocity and bed thickness evaluated using the circumscribed area instead of the plate area. For moderate loads, an interpolation scheme that gradually decreases the flow area can be sought; for example, an effective strainer area versus accumulated debris volume can be deduced from test data that covers the full range of debris loadings.

<sup>16</sup> This is essentially the space occupied by the strainer but is also referred to as the circumscribed size.

One of the key parameters necessary to apply this criterion is the compressibility of fibrous debris beds. NRC measurements have shown that beds tend to be highly compressible when they are subjected to a large head loss across the bed. NUREG/CR-6224 provided the following relationship that can be used to calculate the compressed density of the bed debris as a function of the pressure drop across the bed:<sup>7-2</sup>

$$\rho_f = \rho_{fo} 1.3(\Delta H/\Delta L_o)^{0.38}$$

where

$\rho_f$  is the density of fiber in the debris bed (lbm/ft<sup>3</sup>),

$\rho_{fo}$  is the density of fiber insulation (as fabricated) (lbm/ft<sup>3</sup>),

$\Delta H$  is the head loss across the debris bed (ft-water),

$\Delta L_o$  is the theoretical thickness of the fibrous debris bed (i.e., thickness based on the as-fabricated density) (in).

The following section provides the head loss equations used to perform these calculations.

### 7.3.2.2 Application of the NUREG/CR-6224 Correlation to the PCI Strainer

The following methodology was used to calculate head loss across the debris bed for different debris loadings. The general head loss equation used is

$$\frac{\Delta P}{\Delta L} = 4.16 \times 10^{-5} \left[ \begin{array}{l} 3.5 S_v^2 (1 - \epsilon)^{1.5} \\ [1 + 57 (1 - \epsilon)^3] \mu V + \\ \frac{0.66 S_v (1 - \epsilon)}{\epsilon} \rho V^2 \end{array} \right]$$

where

$\Delta P$  is the pressure drop resulting from flow across the bed (ft-water),

$\Delta L$  is the thickness of the fibrous bed (in.),

$\mu$  is the fluid dynamic viscosity (lbm/s-ft),

$\rho$  is the fluid density (lbm/ft<sup>3</sup>),

$V$  is the fluid velocity (ft/s),

$\epsilon$  is the bed porosity, and

$S_v$  is the specific surface area (ft<sup>2</sup>/ft<sup>3</sup>)

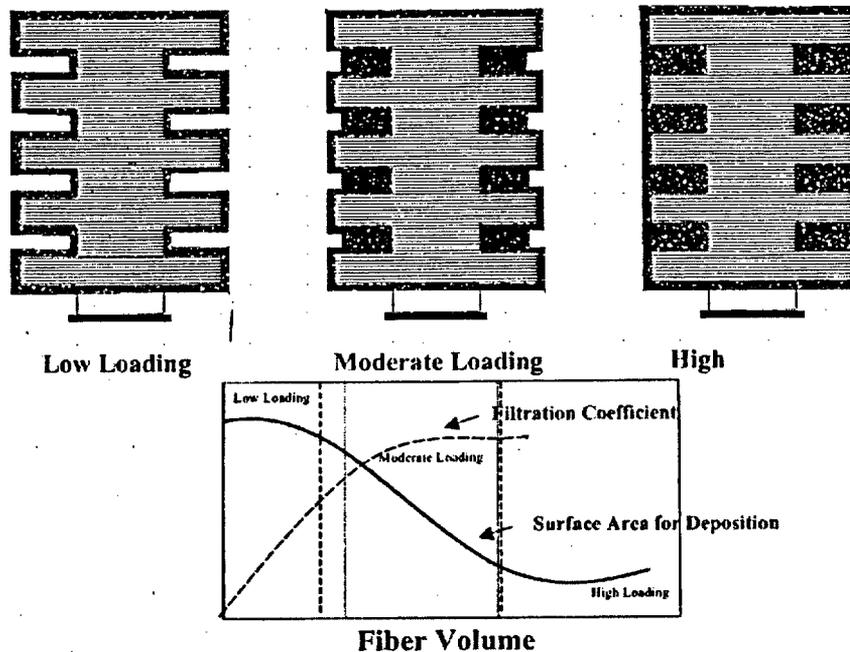


Figure 7-20 Schematic Representation of Debris Build-Up on a Stacked-Disk Strainer

**Thin-Bed Approximation ( $V_f/V_{gap}^{17} < 0.30$ )**  
 For thin beds, the whole plate surface area provides the location for debris deposition. In this case,

$$\begin{aligned} \Delta L_o(\text{in}) &= (12 \cdot M_{\text{fiber}}) / (\rho_{fo} \cdot A_{\text{plate}}) , \\ \Delta L &= \rho \Delta L_o (\rho_{fo} / \rho_f) , \\ V \text{ (ft/s)} &= V_{\text{plate}} \equiv Q(\text{ft}^3/\text{s}) / A_{\text{plate}} , \text{ and} \\ \rho_f / \rho_{fo} &= 1.3(\Delta H / \Delta L_o)^{0.38} . \end{aligned}$$

**Intermediate-Bed Approximation ( $1.0 > V_f/V_{gap} > 0.30$ )**  
 For intermediate loadings, the area available for deposition gradually decreases and the velocity within the bed gradually increases. An approximate formula<sup>18</sup> for evaluating head loss is

$$\begin{aligned} \Delta L_o(\text{in}) &= (12 \cdot M_{\text{fiber}}) / (\rho_{fo} \cdot A_{\text{plate}}) , \\ \Delta L &= \Delta L_o (\rho_{fo} / \rho_f) , \\ V \text{ (ft/s)} &= V_{\text{plate}} (1 - (V_f/V_{gap} - 0.3)) + V_{\text{cir}} \\ &= V_{\text{plate}} (1 - (V_f/V_{gap} - 0.3)) , \\ V_{\text{plate}} &= Q(\text{ft}^3/\text{s}) / A_{\text{plate}} . \end{aligned}$$

$$\begin{aligned} V_{\text{cir}} &= Q(\text{ft}^3/\text{s}) / A_{\text{cir}} , \text{ and} \\ \rho_f / \rho_{fo} &= 1.3(\Delta H / \Delta L_o)^{0.38} . \end{aligned}$$

This relation simply provides a means for calculating head loss using a volume-averaged velocity through the bed.

**Thick-Bed Approximation ( $V_f/V_{gap} > 1.0$ )**  
 Head loss from a thick bed is a sum of head loss resulting from a fully loaded strainer and a calculated contribution from the circumscribed portion using the following closure relationships:

$$\begin{aligned} \Delta L_o(\text{in}) &= (12 \cdot M_{\text{fiber}}) / (\rho_{fo} \cdot A_{\text{cir}}) , \\ \Delta L &= \Delta L_o (\rho_{fo} / \rho_f) , \\ V \text{ (ft/s)} &= V_{\text{cir}} \equiv Q(\text{ft}^3/\text{s}) / A_{\text{cir}} , \text{ and} \\ \rho_f / \rho_{fo} &= 1.3(\Delta H / \Delta L_o)^{0.38} . \end{aligned}$$

Although these equations appear complex, they can be solved easily. The results of the comparison are presented in Figures 7-21 and 7-22. As shown in these figures, the NUREG/CR-6224<sup>7-2</sup> correlation can predict the head loss data for PCI strainers fairly accurately (within  $\pm 25\%$ ).

<sup>17</sup>  $V_f/V_{gap}$  is the ratio of the total volume of debris to volume of debris located within the gaps.

<sup>18</sup> The approximate formula applies to the PCI strainer design tested.

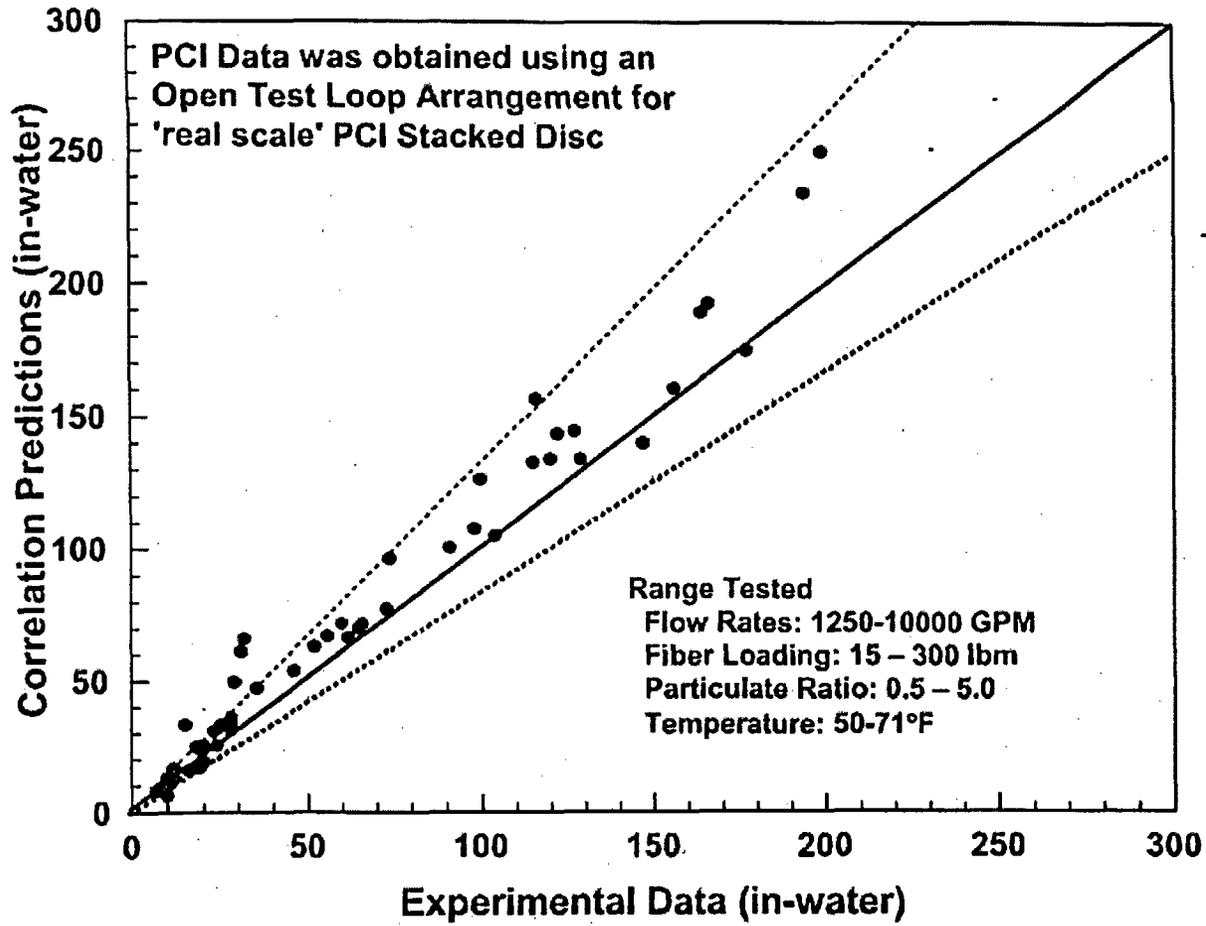


Figure 7-21 Point-By-Point Comparison of Correlation Predictions with PCI Head Loss Data

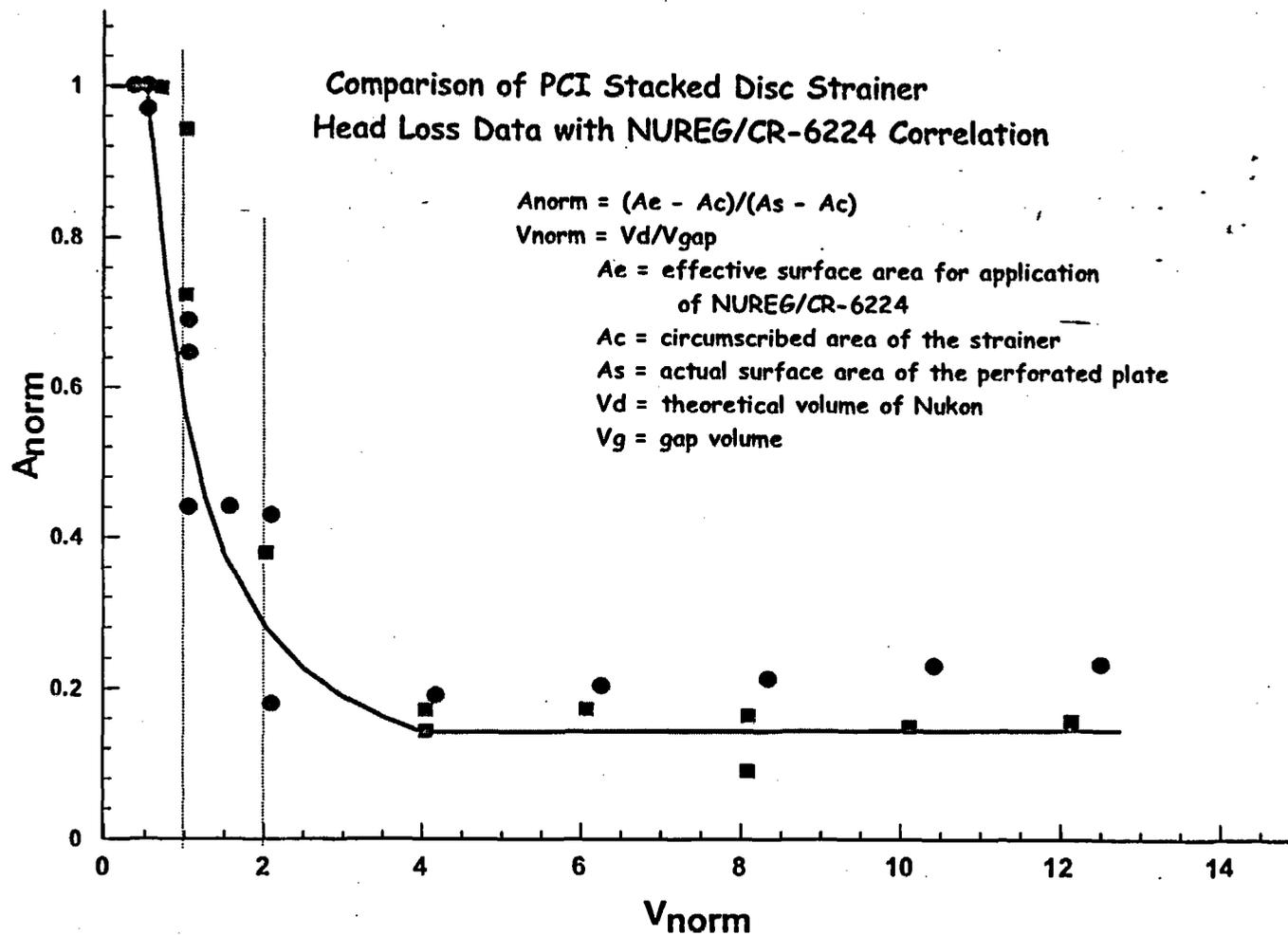


Figure 7-22 Dimensionless Representation of Stacked-Disk Strainer Effective Area as a Function of Debris Volume

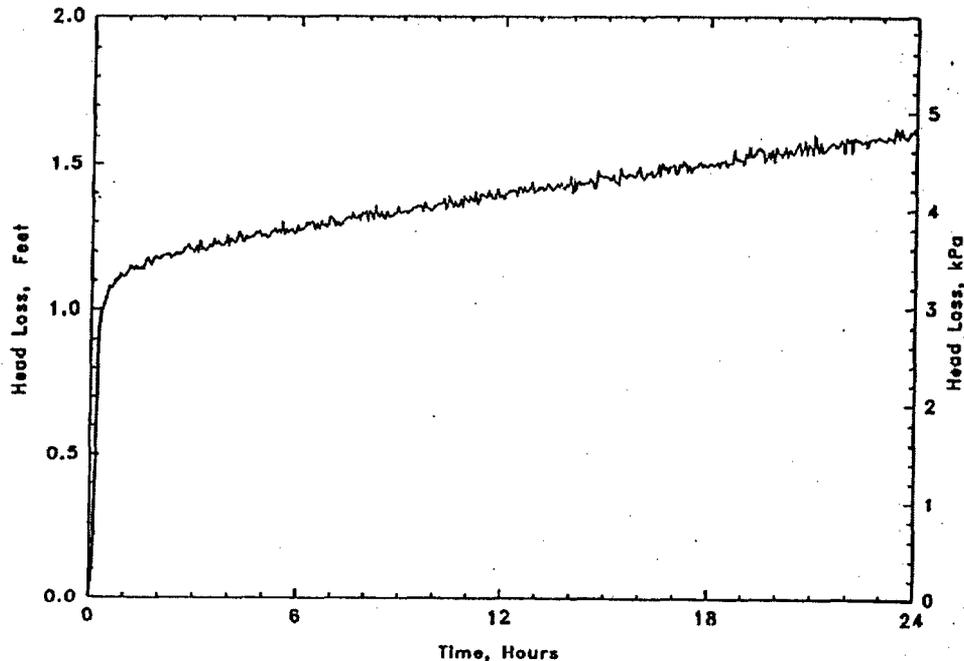


Figure 7-23 Example of Long Term Head Loss for a NUKON™ Debris Bed

Figure 7-21 presents a point-by-point comparison of the NUREG/CR-6224 model predictions with the experimental data. All the points were within  $\pm 25\%$  bounds, indicating good agreement between the correlation and the test data. This agreement confirms that accurately accounting for the change in the effective flow area can be used to adequately simulate the head loss caused by deposition of debris on a stacked-disk strainer. Figure 7-22 presents a plot of the effective strainer area as a function of the volume of debris being deposited. This curve can be used to compute the effective strainer area and can be used directly in conjunction with the NUREG/CR-6224 head loss correlation.

#### 7.4 Ongoing Research on Outstanding Issues

At the publication of this report, continuing NRC-sponsored research will provide additional data regarding specific issues currently not completely understood. These issues have to do with the long-term stability of a fibrous debris bed, head loss data for

calcium silicate debris, and the accumulation and head loss data for vertically oriented sump screens.

##### 7.4.1 Long-Term Fibrous Debris Bed Stability

Head loss test procedures have generally continued the measurement of the pressure drop across the debris bed, following the establishment of that bed, until the head loss became relatively stable. The time required to reach 'steady-state' has generally been on the order of tens of minutes. Occasionally tests were continued for a few hours. But some limited long-term testing has been conducted where the tests were continued for several days to examine the long-term effects of acidity on the debris bed. These tests have been described in an ARL Test Report<sup>7-29</sup> and in a paper presented to the 1999 OECD/NEA Workshop on Sump Screen Clogging.<sup>7-30</sup>

The concern of the long term testing was whether or not the structure of a fibrous debris bed remained stable in the long term.

Although the long term testing was not extensive enough to conclusively determine the long-term debris bed behavior, it appeared that fiberglass in debris beds is subject to dissolution in alkaline solutions. Further, the binder could lose its attachment to the fibers and the bed matrix could break down, so that the bed would become denser. The primary parameters affecting increased long-term head loss appear to be water acidity level and temperature. In the limited testing, the head loss was shown to increase gradually (approximately linear with time) until the test was terminated. The length of the long-term tests ranged from 1 to about 11 days. An example of long-term head loss is shown in Figure 7-23.

NRC sponsored research is being conducted by the Civil Engineering Department of the University of New Mexico. This research is studying the chemistry associated with a PWR sump pool and the results of this research could provide insights into this issue.

#### 7.4.2 Calcium Silicate Debris Head Loss

As discussed in Section 7.1.2, experiments at the University of New Mexico (UNM)<sup>7-31</sup> under U.S. NRC sponsorship are being conducted to study the head loss effects of calcium-silicate. This data when available will indicate trends in the head loss associated with calcium silicate debris and provide definitive data that can be used to support head loss correlations.

#### 7.4.3 Vertically Oriented Screens

Experiments at the University of New Mexico (UNM)<sup>7-31</sup> under U.S. NRC sponsorship are also being conducted to study the debris accumulation and associated head loss for vertically oriented sump screens. For instance, the test data when available will show trends regarding conditions where the debris will accumulate uniformly and where the debris will deposit preferentially towards the bottom of the screen. Limited head loss data was also accumulated for a vertical screen.

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## 8.0 RESOLUTION OPTIONS

Based on the recognition that debris clogging of the ECCS strainers is a significant safety concern, plant owner groups and vendors proposed a broad range of solutions to address this issue. This section provides a summary of some of the prominent solutions and how they were implemented in selected U.S. nuclear plants. This section does not provide all the information necessary to evaluate each solution comprehensively, because such information is in most cases protected by the proprietary nature of the vendor designs. Instead, this section provides an overview of solution options and important considerations.

The following subsection describes the replacement strainers explored for application in U.S. BWR plants. Although some or many of the hardware designs described below may be appropriate for implementation in U.S. PWR plants, none have been installed at any of the operating U.S. PWRs. It should also be noted that some strainer designs originated from European research and that several of the designs, both European and U.S. designs, are protected by proprietary constraints.

### 8.1 Overview of Resolution Options

BWR experience demonstrates that there are three general strategies for resolving the strainer clogging issue:

1. Remove (or replace) problematic insulation from the containment,
2. Install replacement strainers that can handle anticipated debris loads without exceeding the NPSH margin, or
3. A combination of items 1 and 2.<sup>8-1</sup>

The replacement strainer options researched by the various investigators fall into four categories:

1. Installation of large capacity passive strainers with sufficient capacity to ensure that debris loadings equivalent to a scenario calculated in accordance with Section C.2.2 of RG 1.82, Rev. 2, do not cause a loss of NPSH for the ECCS,
2. Installation of a self-cleaning strainer that automatically prevents strainer clogging by providing continuous cleaning of the strainer surface with a scraper blade, brush, or other mechanism,

3. Installation of a backflush system that relies on operator action to remove debris from the surface of the strainer to prevent it from clogging, and
4. Installation of in-line (or inside ECCS suction piping) suction strainers located outside the suppression pool (or the containment) that can be realigned and flushed whenever the differential pressure exceeds the pump NPSH-margin.<sup>1</sup>

Option 1 had the advantages of being completely passive so that operator intervention was not required and it did not require an interruption of ECCS flow. Licensees choosing Option 1 for resolution were required to establish new programs or modify existing programs to ensure that the potential for debris generated and transported to the strainer surface does not at any time exceed the assumptions used in estimating the amounts of debris for sizing of the strainers, in accordance with RG 1.82.

Option 2, like Option 1, would not rely on operator action nor interrupt ECCS flow but instead relies on an active component to keep the strainer surface clean that would be fully exposed to LOCA effects in the suppression pool. Therefore, appropriate measures must be taken to ensure its operability.

With the selection of Options 3 and 4, extensive measures had to be taken to:

1. Maximize the amount of time before clogging could occur,
2. Ensure that instrumentation and alarms indicate strainer differential pressure increases,
3. Institute operator training on recognition and mitigation of a strainer clogging event, and
4. Implement surveillance to ensure operability of the strainer instrumentation and backflush system.

The strainer designs explored experimentally in the U.S. (i.e., BWROG) included several concepts for passive strainer designs, passive strainers with backflush capability, and one self-cleaning strainer.<sup>8-1</sup>

<sup>1</sup> The NRC suggested the first three of these options in NRCB 96-03<sup>8-2</sup> (discussed in Section 1.1).

In addition, the BWROG carried out engineering studies to examine the feasibility of adopting European solutions to the U.S. BWR plants. Based these studies, the BWROG concluded that replacing the existing strainers with large-capacity passive strainers is the preferred option for BWR implementation. Furthermore, it was recommended that backflush should be considered for installation as a "defense-in-depth" option, but not as a front-line option. Similarly, BWROG concluded that although a self-cleaning strainer installation was a feasible option, licensees would have to resolve significant design, qualification, and surveillance issues with the NRC on a plant-specific basis. Thus the BWROG all but ruled out all options other than installation of large replacement passive strainers that would reliably mitigate the adverse impacts of debris accumulation and maintain sufficient NPSH margin throughout an accident.

Installation of passive strainers that can handle anticipated debris loads consistent with BWROG guidance was not practical for all the plants due to additional constraints related to hydrodynamic loads. In those cases, plants installed the largest passive strainers acceptable in conjunction with the other options, including:

1. The replacement of problematic insulation with insulation determined to be less likely to generate or transport debris to the strainer, and
2. The revision of the NPSH calculation to include containment over pressure and/or eliminate conservatism in piping head loss calculations.

## 8.2 Replacement Strainer Designs

This section focuses on various strainer options installed in U.S. BWRs and draws inferences regarding their applicability to U.S. PWRs.<sup>2</sup>

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<sup>2</sup> At the time of this report, one U.S. PWR implemented a partial solution to address concerns related to debris buildup and NPSH. The hardware changes made at this plant included increasing the sump screen area and possible redesign of parts of the sump. Reportedly, a series of experiments were performed in support of the strainer design and installation. The details of the design and the associated testing and qualification program were not available for review; therefore, a summary of this design is not included herein.

### 8.2.1 Passive Strainer Designs Installed in U.S. Nuclear Power Plants

The BWROG research into passive strainer design was limited in scope, focusing primarily on evaluating the feasibility of certain concepts, such as the star strainer and stacked disk-strainer. This research program and the results are summarized in the BWROG URG.<sup>6-1</sup> Figure 8-1 presents a schematic representation of the test setup used in the BWROG prototype testing. Typically, the strainer module is located in a large tank of water. Water flow through the strainer module is maintained by recirculation pumps, which take suction through the strainer and discharges back into the tank. In some test setups, water discharge locations are located strategically to maximize turbulence in the tank, such that the potential for debris settling in the tank is minimal.<sup>3</sup> Other test setups use either mechanical or manual means to ensure that most of the debris added to the tank would reach the strainer, and that minimal, if any, debris would settle out in the tank. Head loss across the strainer is monitored using a pressure transducer located downstream of the pipe flange connected to the strainer.

The experimental results suggest that head loss across the passive strainers modules (i.e., the advanced designs described below) is a non-linear function of debris loading. Figure 8-2 shows a representation of measured head loss as a function of strainer debris loading for a stacked disk strainer. The advanced passive strainers are designed such that they would have a gap or crevice where debris would initially accumulate preferentially when debris loading is small. The debris accumulated in these gaps would be subjected to lower fluid velocities, and hence would lead to lower head loss. Further, when the flow moves somewhat parallel to portions of the strainer surfaces, debris on these surface is pushed further into the gaps, thereby keeping a portion of the disk surface relatively clean of debris until the gaps are filled. After these gaps are filled, debris would start to accumulate on the circumscribed surface of the strainer, which resembles a regular shaped strainer (cylindrical in the case of stacked-disk strainers). In view of this complex

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<sup>3</sup> The quantity of debris on the strainer was usually based on the quantity of debris introduced into the test tank, therefore the quantity of debris not collected on the strainer needed to be negligible.

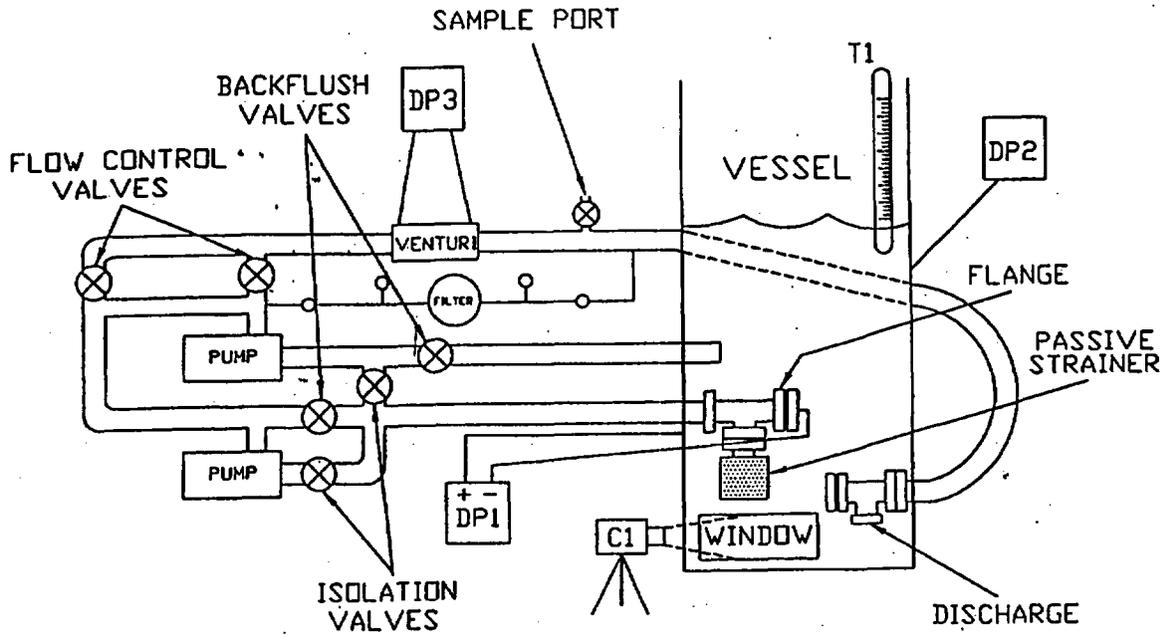


Figure 8-1 BWROG Prototype Module Test Program

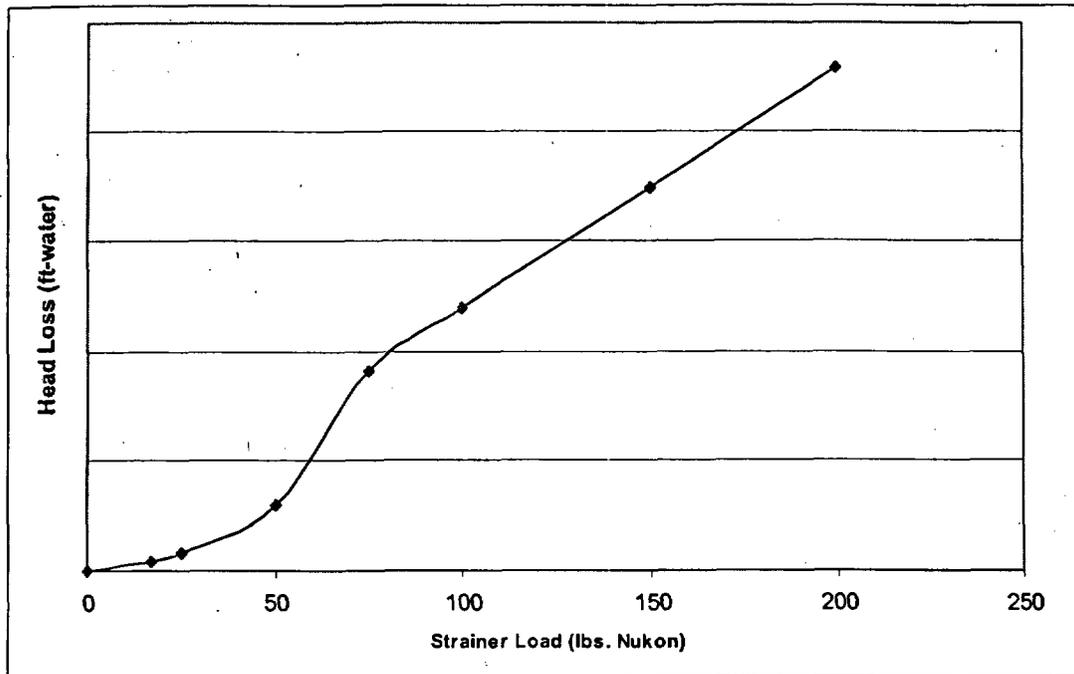


Figure 8-2 Measured Head Loss as a Function of Strainer Debris Loading for Typical Advanced Passive Strainers

relationship between the head loss and debris loading, special attention should be paid to collecting head loss data over a wide range of debris loading and carefully judging the applicability of test data to a given plant.

The primary design concept in all passive strainers is to maximize the strainer surface area (i.e., area of the perforated surface through which water flows into the strainer) while minimizing the space required for the strainer.<sup>4</sup> These design concepts were further refined or reengineered as required by strainer vendors to suit specific plant needs. The vendors in support of particular strainer designs undertook separate testing and engineering studies. Ultimately, four types of passive strainer designs were installed at U.S. BWRs. Although these designs differ significantly from each other, the designs had one common feature in that they all rely on cavities, troughs, or traps where debris can collect on the strainer surface without significantly increasing head loss across the strainers.

#### 8.2.1.1 PCI Stacked-Disk Strainers

PCI developed and tested prototype stacked-disk strainers, and designed, fabricated and installed advanced passive stacked-disk strainers for installation at several U.S. BWRs.<sup>8-3,8-4,8-5</sup> The PCI strainer concept, referred to commercially under the trademark Sure-Flow, consists of a stack of coaxial, perforated metal plate disks that are welded to a common perforated internal core tube. The design maximizes the strainer surface area while keeping the volume occupied by the strainer to a minimum. Innovative Technology Solutions Corporation (ITS) provided the head loss performance modeling and sizing solutions for industry implementation<sup>8-6</sup> based on NUREG/CR-6224 methodology.<sup>8-7</sup> Figure 8-3 is a photograph of the PCI strainers installed at a BWR. Among the design features of the PCI strainer is the internal core tube designed to ensure relatively uniform approach flow<sup>5</sup>. The core tube is shown in Figure 8-4. Several

<sup>4</sup>Minimizing circumscribed area was of benefit to BWRs because of issues related to hydrodynamic loads and also because compact strainers were needed to fit into the suppression pools.

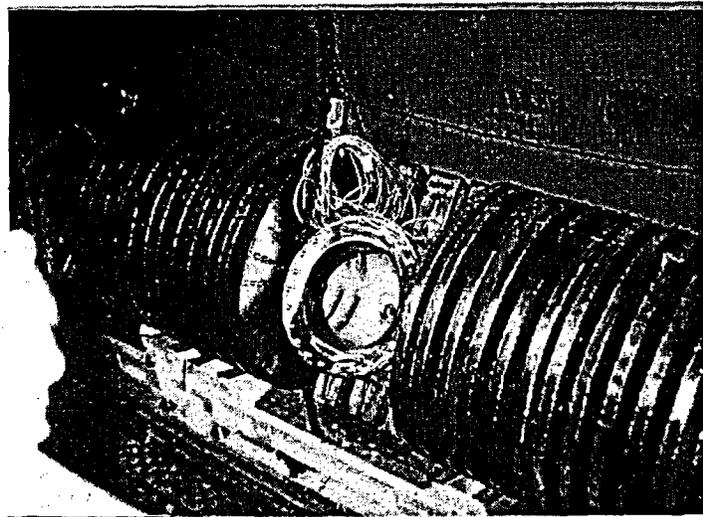
<sup>5</sup>The core tube provides structural support and also makes the approach flow more uniform.

prototypes of the PCI stacked-disk strainers were tested for head loss measurements at the EPRI NDE Center test facility and other test facilities. PCI reports provide a description of the test program and the results.<sup>8-3,8-4,8-5</sup> The hydraulic performance of PCI strainers was also tested by the BWROG<sup>8-1</sup> and as part of qualification testing by Commonwealth Edison.<sup>8-8</sup>

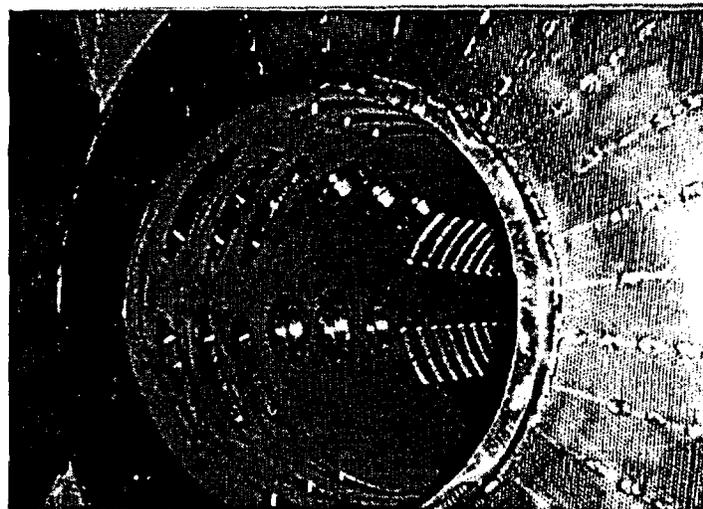
#### *PCI Sure-Flow Strainer Design and Testing Program*

PCI fabricated and tested prototypes over a period of nine months to evaluate the head loss performance of the Sure-Flow strainers. The hydraulic performance testing was conducted at the EPRI test facility using the test setup designed and operated as part of the BWROG testing program. One prototype, referred to as Stacked-Disk #1 in the URG, was a 40%-scale prototype with six disks, five troughs between the disks, a 13-in. core tube, a 30-in. outside diameter, and was 2.5 ft long. A larger prototype, referred to as Stacked-Disk #2, was a 4-ft-long strainer with a core tube diameter of 26 in. and a stack outer diameter of 40 in. Both the BWROG and PCI tested the head loss performance of these strainers: An engineering correlation of the test data was proposed by PCI for limited applications.

The Sure-Flow strainer is not a standardized strainer, i.e., one size does not fit all. Instead, the PCI concept is to use similarly designed strainer modules of various sizes and quantities as necessary for each plant. A plant would first determine the anticipated debris loading and the strainer design criteria applicable to that plant. PCI and its contractors would determine the size and number of stacked-disk modules necessary to meet the design criteria. For this approach to be successful, the PCI team needed a model that accurately predicted the head loss performance of a generic PCI Sure-Flow strainer. ITS Corp. adapted the head loss model used in the NUREG/CR-6224<sup>8-7</sup> study for use with the stacked-disk strainer geometry,<sup>8-6</sup> and developed a proprietary computer code named HLOSS to automate head loss calculations performed for each plant. The overall technical approach for using the NUREG/CR-6224 correlation to predict PCI Sure-Flow strainer performance was validated by comparing correlation predictions with head loss data.



**Figure 8-3 PCI Stacked-Disk Strainer Being Installed at Pilgrim Nuclear Power Plant**



**Figure 8-4 The Core Tube Used in the PCI Stacked-Disk Strainers**

***NRC Review of the PCI Strainer Program***

Because the PCI test data and the ITS head loss models were used by many licensees, the NRC contractor LANL performed an in-depth review of the PCI head loss data and evaluated the adequacy of the head loss models. The results of this review are summarized in the LANL technical evaluation report (TER) "Technical Review of Selected Reports on Performance Contracting, Inc. Sure-Flow

Strainer™ Test Data."<sup>8-9</sup> In general, it was concluded that the test program used by PCI for verifying the hydraulic performance of the prototype strainer is acceptable.

***Documentation***

The PCI head loss data is documented in the PCI report "Summary Report on Performance of Performance Contracting, Inc.'s Sure-Flow™ Suction Strainer with Various Mixes of Simulated

Post-LOCA Debris.<sup>8-3</sup> The results of this review are summarized in the LANL TER entitled "Technical Review of Selected Reports on Performance Contracting, Inc. Sure-Flow Strainer™ Test Data."<sup>8-9</sup>

#### 8.2.1.2 General Electric Stacked-Disk Strainers

GE supplied an advanced passive stacked-disk strainer to the nuclear industry that was designed to alleviate the strainer blockage problem. The GE design (information regarding the design is proprietary) offered an improvement over the conventional stacked-disk strainers tested by the BWROG. A relatively large cavity volume accommodates larger volumes of insulation debris without a substantial increase in the head loss. Each GE strainer is designed specifically to suit a particular plant application to meet specific requirements for estimated debris and hydrodynamic loadings. The design details of the strainer and the hydraulic performance characteristics of the strainer were provided to NRC for review by GE in a proprietary GE Licensing Topical Report (LTR).<sup>8-10</sup> The NRC review of the GE strainer performance and important conclusions are summarized in a LANL TER (not publicly available).<sup>8-11</sup> GE strainers were installed at Duane Arnold, Hatch (Unit 1), Oyster Creek, River Bend, Cooper, Fermi (Unit 2), Susquehanna (Units 1 and 2), Nine Mile Point (Unit 2), and Browns Ferry (Unit 2 and 3).

#### GE Program

GE fabricated a prototype strainer and tested its hydraulic performance at the EPRI NDE Center. The facility and testing procedures were the same as those used in the BWROG test program. The tests involved both fibrous debris and RMI debris. In each test, predetermined quantities of fibrous debris, corrosion products, and RMI debris were added to the test tank and kept in suspension by pumped-flow recirculating flow patterns. Sufficient time was allowed for debris to accumulate on the strainer surface, and then the head loss was measured at varying flow velocities. The objective was to examine the effect of velocity on debris bed compression without the results being affected by filtration. The actual quantity of debris deposited on the strainer surfaces was not directly measured but deduced from the quantity of debris added to the

pool. (A similar approach was followed in all BWROG tests.)

#### NRC Review of the GE Program

The NRC reviewed<sup>8-11</sup> GE's "Application Methodology for GE Stacked-Disk ECCS Suction Strainer-1,"<sup>8-10</sup> and associated documents. In addition, the NRC sponsored two sets of confirmatory analyses to evaluate the GE head loss methodology. In the first analysis, the NRC examined:

1. The actual range of experimental parameters explored in the GE tests and compared the parameters with those of the proposed plant applications, and
2. The process used to develop the correlation and the generic acceptability of the correlation.

The second set of calculations compared GE test data with the predictions of a modified version of NUREG/CR-6224 correlation.

Based on the NRC review, the NRC staff concluded that the test program used by GE for verifying the hydraulic performance of the prototype strainer is acceptable for BWR applications. However, the staff had concerns regarding the validity and use of this correlation for plants outside those reviewed.

#### Documentation

The GE methodology is documented in the GE's "Application Methodology for GE Stacked-Disk ECCS Suction Strainer" (proprietary).<sup>8-10</sup> The NRC review of the GE methodology for determining head loss across GE stacked-disk strainers is documented in a LANL TER entitled, "Technical Review of GE LTR NEDC-32721P: Application Methodology for GE Stacked-Disk ECCS Suction Strainer" (proprietary corporate information).<sup>8-11</sup>

#### 8.2.1.3 ABB Combustion Engineering Strainers

The ABB strainers use another approach to extend the screen area and thus reduce the approach velocity at the plate. The original strainer design is based on concepts developed in Europe; however, later developments were undertaken in U.S. The design was tested and demonstrated by ABB at the EPRI facility.<sup>8-12</sup> The ABB strainers were installed at Peach Bottom (Units 2 and 3) and Limerick (Units 1 and 2). The NRC did not specifically review the

testing program for the ABB strainers; however, the NRC did review plant specific evaluations where ABB strainers were employed. ABB designs are protected as proprietary information.

#### **Documentation**

LANL review of ABB strainer performance and related issues are summarized in the Limerick audit report entitled, "On-Site Audit of the Limerick Nuclear Power Plant Emergency Core Cooling System Strainer Blockage Resolution."<sup>8-13</sup>

#### **8.2.1.4 Mark III Strainers**

The Mark-III BWR owners sponsored a research program to design and qualify a strainer best suited for Mark III containments. This design takes advantage of the Mark III containment layout. The strainers are very large and are located on the floor of the suppression pool. Figure 7-14 is a photograph of an individual strainer module from the quarter-scale test facility. Several (up to 50) of these full-scale strainer modules are joined together to form the strainer in the plant. Figure 7-13 shows an assembled strainer. The resulting strainers have surface areas in excess of 6000 ft<sup>2</sup>. These strainers were tested at the quarter-scale test facility. NRC review comments on the testing program and the application of the test results in the plant submittals are summarized in the Mark III Grand Gulf Nuclear Station (GGNS) Audit Report and LANL TER.<sup>8-14</sup> GGNS replaced its existing truncated cone strainers that had a net surface area of 170 ft<sup>2</sup> with large-capacity passive strainers having a combined area of 6253 ft<sup>2</sup> (~37 fold increase). Strainers of this design were also installed at Perry and Clinton.

GGNS also conducted extensive quarter-scale pool transport and head loss testing for their replacement strainer design and small-scale testing for a segment of the design. The NRC staff audited the GGNS strainer clogging issue resolution in August 1999 and evaluated the application of quarter-scale testing to the GGNS plant analysis. The replacement strainers, designed by Enercon Services, Inc., were combined into a large single strainer that circumscribes the suppression pool near the floor, as illustrated in Figure 7-13. This strainer serves as a common header for all six ECCS pumps so that any combination of operating systems can draw recirculation water through the same large screen area. The primary concern regarding their test program was the

estimation of the combined effects of fibrous debris (Kaowool and fiberglass) and particulate debris consisting primarily of calcium silicate.

#### **Grand Gulf Quarter-Scale Test Program**

GGNS sponsored a research program to study head loss performance of their replacement strainer. A quarter-scale strainer was built and installed in the Mark-III quarter-scale test facility. Geometric, operational, and debris loading parameters were all scaled to the GGNS plant values. The flow velocity and debris bed thickness were monitored in the tests to ensure that the measured head loss caused by the debris buildup could be used directly in the plant NPSH analysis.

#### **NRC Review of Grand Gulf Quarter-Scale Test Program**

The staff compared the scaled test parameters to those of the plant and determined that the quarter-scale testing adequately simulated important flow parameters. In particular, the licensee ensured that the approach velocity at the strainer surface was the same as the approach velocity in the plant, and the debris loadings per unit area of the strainer in the tests were the same or greater than those expected in the plant. There are two geometrical differences between the quarter-scale test setup and the plant:

1. The quarter-scale tests used a significantly lower number of strainer sections compared to the plant, and
2. The construction of these strainer segments was different with respect to specifics, such as the number of ribs and the plate thickness.

These differences mean that clean-strainer head losses measured in the quarter-scale test setup were not directly scalable to the GGNS plant application. However, the licensee performed detailed analyses to correct for these differences.

All of the tests were conducted at 75°F whereas the suppression pool temperatures were expected to reach approximately 185°F. The licensee used the test results directly in their NPSH margin evaluation; however, this was conservative because testing at the lower test temperature resulted in higher head losses, due to viscous effects, than would have occurred if the testing had been performed at the temperatures expected to result following a LOCA. The clean-strainer head loss for the quarter-scale geometry was about 3 in. of water at the conditions representing runout ECCS flow.

The licensee sponsored five tests directly applicable to GGNS. The NRC staff drew the following conclusions regarding the GGNS quarter-scale testing program and its results:

- The licensee test program was extensive with great attention to detail.
- Data repeatability was acceptable. Head loss variations of 2-ft water or less were measured for repeatability tests and the plant has sufficient margin to account for these uncertainties.
- The head loss tests indicate that some of the tests might not have reached steady state before termination. The licensee accounted for this apparent shortcoming by extrapolating to a steady value.
- Debris bed combinations of Kaowool and calcium silicate resulted in high head losses, even though the approach velocity was relatively slow (0.016 ft/s). This finding was significant, because such data was previously not available. It should also be noted that the licensee continued selected testing after the staff completed their review to better understand head loss implications of calcium silicate insulation debris.

#### **Documentation**

A review of the GGNS strainer testing is found in a LANL TER, titled "On-Site Audit of the Grand Gulf Nuclear Station Emergency Core Cooling System Strainer-Blockage Resolution."<sup>8-14</sup>

### **8.2.2 Active Strainer Designs**

#### **8.2.2.1 BWROG Research into Active Strainer Concepts**

BWROG test program performed two series of tests into active strainer concepts; these concepts were the passive strainer with backflush capability concept, and the self-cleaning strainer concept. For backflush strainers, tests were conducted to evaluate the maximum fiber and corrosion product capacity until backflush needs to be operated, the effect of thin fiber beds, the feasibility of backflushing, and the effect of RMI on backflush. Tested debris included prototypical fibrous insulation, RMI, simulated corrosion products, and miscellaneous debris. The self-cleaning strainer was tested to evaluate its ability to maintain a clean strainer surface area under various debris loadings at design flow rates and its start up capability after a period at a minimum flow condition. Utility Resolution Guidance for ECCS

Strainer Blockage, General Electric Nuclear Energy Company, Class 1, Nov. 1996,<sup>8-1</sup> describes these strainer design concepts and their associated test programs.

The summarized results for backflushing are as follows.

- The truncated core strainer was successfully backflushed under all conditions. Typically fibrous insulation can be easily backflushed, but when it is mixed with suppression pool sludge or other particulate debris removal became difficult. Also, the removed material tended to accumulate on the strainer again as the flow was reinitiated and at a rate faster than the first time.
- Although some relief was obtained for the 60-point star and the stack-disk strainer designs tested, debris was not adequately removed at flow rates up to the maximum backflushing 5000-gpm flow when fibrous insulation was used.
- With the exception of some RMI debris wedged into the internal portions of the stars of the 60-point strainer, the RMI debris by itself was successfully removed by shutting off pump suction flow (i.e., no backflush required).

The summarized results for self-cleaning strainer testing are:

- The active front portion of the strainer was kept clean for all debris types and loadings tested at the design flow rate of 5000-gpm. The head loss across the strainer was found to be essentially constant at a given flow rate and independent of the debris loading.
- It is possible that sufficient debris can accumulate on the active portion of the strainer under a low-flow start-up condition to prevent subsequent plow/brush rotation at design flow rates.
- Although the strainer maintained a clean front surface, the head loss across the clean strainer and the torque generated by the turbine were higher than expected. This result required that considerable additional engineering would be needed prior to installation. It is also possible that installation and operation may be difficult to qualify when subjected to hydrodynamic loads.
- Foreign materials, such as anti-contamination clothing and booties, tended

to become lodged in between the plow and the strainer surface. They are then difficult to dislodge.

Installation of active strainers at U.S. Nuclear Power Plants was not undertaken because:

- Operability testing and inspection of active components were deemed very resource intensive, especially for BWRs where strainers are located in the suppression pool, and
- Design and sizing of the strainers is complicated by the fact that all such analyses must make important assumptions regarding the rate at which the debris arrives at the strainer and the time available for operator action.

### 8.3 Overview of U.S. BWR Plant Implementation

From the beginning, it was recognized by both the NRC and the BWROG that none of the passive strainer designs are standardized designs (i.e., a one-size strainer fits all strainer applications). Further, it was recognized that additional analyses would have to play an important role in sizing the strainer. As a result, considerable effort was devoted in the BWROG URG to provide detailed guidance on performing plant-specific analyses to estimate the potential for debris loads on the ECCS suction strainers following a LOCA, taking into consideration the guidance provided in the RG 1.82, Rev. 2.

Every operating U.S. BWR plant replaced their existing LPCI and LPCS pump suction strainers (typically conical type strainers). The industry addressed the requirements of NRC Bulletin 96-03<sup>8-2</sup> by installing large capacity passive strainers in each plant (i.e., NRC Option 1) with sufficient capacity. There were, however, a few plants that installed the replacement strainer before the BWROG URG and the URG SER were issued. The supporting analyses for these plants deviated in some cases significantly from the approved URG methodologies.

#### 8.3.1 NRC Review of U.S. Plant Implementation

The NRC closely followed plant implementations through active participation in the industry meetings, review of plant-specific submittals, and by performing onsite audits of four nuclear power plants. Participation in industry meetings

facilitated the exchange of information with the BWROG and individual licensees, and provided a means for the NRC to clarify specific elements of the regulatory guidance (e.g., the thin-bed head loss issue). The participation also helped the NRC staff to keep abreast of the methods used by the licensees and of uncertainties in some of the assumptions in sizing strainers.

Plant-specific submittals were provided by some licensees as part of licensing amendment requests, consistent with the requirements of 10 CFR 50.59 and 10 CFR 50.90. Most of the licensing amendments were related to licensee intent to use higher containment overpressure credit in the NPSH calculations.

Prior to the completion of the NRC staff's review of the URG, some submittals were provided for NRC review during the strainer sizing and design phase to minimize the replacement project risk. A list of plants that provided replacement strainer details for NRC review is as follows: Browns Ferry (Units 2 and 3), Brunswick (Units 1 and 2), Cooper, Hatch (Units 1 and 2), Hope Creek (Units 1 and 2), LaSalle (Units 1 and 2), Limerick (Units 1 and 2), Peach Bottom (Units 2 and 3), Pilgrim (Unit 1), and Quad Cities (Units 1 and 2).

The strainer areas (plant totals) installed at the operating BWR plants are listed in Table 8-1 along with their respective strainer vendors.<sup>8-19</sup> As evident, the replacement strainers are in general very large compared to pre-NRCB 96-03 strainers. Only four sites installed strainers with areas less than 1100 ft<sup>2</sup> and these four sites use primarily RMI and have little fibrous insulation in containment. The flow velocities at the plate for the replacement strainers ranged between about 0.001 ft/s and 0.1 ft/s.

Based on their review of each plant submittal, the NRC concluded that the industry had addressed the requirements of NRC Bulletin 96-03 by installing large capacity passive strainers in each plant (i.e., NRC Option 1). The strainers had sufficient capacity to accommodate the debris loads postulated to reach the strainer following a worst-case large break LOCA. The NRC found that in most cases the licensees had voluntarily used conservative assumptions in sizing and designing the replacement strainers. This voluntary conservatism was in addition to conservatism built-in to the URG guidance.

<b>Plant</b>	<b>Reactor Design</b>	<b>Containment Design</b>	<b>Total Area per Plant (ft<sup>2</sup>)</b>	<b>Strainer Vendor</b>
Browns Ferry 2 & 3	BWR/4	Mark I	1192	GE
Brunswick 1 & 2	BWR/4	Mark I	1575	PCI
Clinton	BWR/6	Mark III	6057	Enercon
Cooper	BWR/4	Mark I	2164	GE
Dresden 2 & 3	BWR/3	Mark I	475	PCI
Duane Arnold	BWR/4	Mark I	1359	GE
Fitzpatrick	BWR/4	Mark I	2928	PCI
Fermi 2	BWR/4	Mark I	2322	GE
Grand Gulf	BWR/6	Mark III	6253	Enercon
Hatch 1 & 2	BWR/4	Mark I	1110	GE
Hope Creek	BWR/4	Mark I	3788	PCI
LaSalle 1 & 2	BWR/5	Mark II	500	PCI
Limerick 1 & 2	BWR/4	Mark I	2715	ABB
Monticello	BWR/3	Mark I	1224	PCI
Nine Mile Point 1	BWR/2	Mark I	1286	PCI
Nine Mile Point 2	BWR/4	Mark II	1412	GE
Oyster Creek	BWR/2	Mark I	1425	GE
Peach Bottom 2 & 3	BWR/4	Mark I	3550	ABB
Perry	BWR/6	Mark III	5326	Enercon
Pilgrim	BWR/3	Mark I	1340	PCI
Quad Cities 1 & 2	BWR/3	Mark I	832	PCI
River Bend	BWR/6	Mark III	2424	GE
Susquehanna 1 & 2	BWR/4	Mark II	1340	GE
Vermont Yankee	BWR/4	Mark I	2488	PCI
WNP 2	BWR/5	Mark II	825	PCI

### 8.3.2 Onsite Plant Audits

Four BWR plants were chosen for a detailed onsite audit by the NRC staff: Limerick (BWR/4 Mark II), Dresden (BWR/3 Mark I), Duane Arnold (BWR/4 Mark I), and Grand Gulf (BWR/6 Mark III). The primary objective of these audits was to independently confirm the adequacy of the strainer sizes and to independently evaluate the performance of the replacement strainers under LOCA conditions. In addition, the audit reviewed the supporting documentation to identify any concerns regarding licensee strainer design criteria and strainer performance analyses. In particular, the review of licensee strainer design analyses did the following:

1. Evaluated how the licensee estimated the quantity of debris used for sizing the strainer, that is, determined if the methodologies used for selecting the breaks were consistent with RG 1.82, Rev. 2, and

provided reasonable estimates for debris generation and transport.

2. Evaluated the licensee's proposed strainer design criteria and strainer performance.

During the plant audit, the NRC staff undertook a detailed review of the documentation provided by the licensee and performed several independent calculations, as necessary. The types of analyses performed by the staff during the audit included:

1. Debris Generation Calculations. Wherever possible or necessary, the NRC staff used reactor piping layout drawings to independently map the ZOI and estimate the quantity of debris contained within the ZOI.
2. Debris Loading Evaluations. In each case, the staff independently calculated the debris loads expected on the strainer following a LOCA and how these loadings compared with the licensee estimates. The comparison provided a measure of the

margin-of-conservatism in the licensee calculations.

3. Strainer Head Loss and NPSH Evaluations. NRC staff used the BLOCKAGE computer code to estimate head losses corresponding to various postulated ECCS responses (e.g., single-failure criterion). These head loss estimates were compared with the licensee estimates to draw conclusions regarding strainer performance.

In addition, NRC staff paid close attention to judge the effectiveness of the licensee FME program. The results of the technical analyses are summarized in the audit reports. These TERs were:

- "On-Site Audit of the Grand Gulf Nuclear Station Emergency Core Cooling System Strainer-Blockage Resolution."<sup>8-14</sup>

- "On-Site Audit of the Dresden Nuclear Power Plant Emergency Core Cooling System Strainer Blockage Resolution."<sup>8-15</sup>
- "On-Site Audit of the Limerick Nuclear Power Plant Emergency Core Cooling System Strainer Blockage Resolution."<sup>8-13</sup>
- "On-Site Audit of the Duane Arnold Energy Center Emergency Core Cooling System Strainer Blockage Resolution."<sup>8-16</sup>

Table 8-2 provides a brief summary of the issue resolution for the audited plants. The screen areas provided in the table again demonstrate the large sizes of the resolution strainers, especially when compared to their respective pre-NRCB 96-03 strainers.

**Table 8-2 Issue Resolution Summary for Audited Plants**

Plant	Design	Insulation Types Located in the Drywell	Plant Resolution	Resolution Basis	NRC Audit Findings
Grand Gulf Nuclear Station	BWR/6 Mark III	RMI Kaowool Calcium-Silicate Fiberglass	Increased existing strainer surface area from 170 ft <sup>2</sup> to 6253 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG supported by ¼ scale testing.	Licensee conservatively estimated debris generation, transport, and strainer head loss. NRC estimated head losses substantially less than licensee estimate.
Limerick	BWR/4 Mark II	NUKON Min-K RMI <sup>*</sup>	Increased existing strainer surface area from 269 ft <sup>2</sup> to 2715 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG. Head loss estimate less than 4-ft water and NPSH margin of 12-ft water.	Licensee conservatively estimated debris generation, transport, and strainer head loss. NRC estimated head loss less than 2-ft water.
Duane Arnold	BWR/4 Mark I	NUKON Calcium-Silicate RMI <sup>*</sup> Lead Wool <sup>**</sup>	Increased existing strainer surface area from 38 ft <sup>2</sup> to 1359 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG and GE head loss correlation.	Licensee used NRC-approved methods to estimate debris generation and transport, and estimated conservative strainer head loss.
Dresden	BWR/3 Mark I	RMI NUKON Calcium-Silicate Asbestos <sup>**</sup> Amaflex <sup>**</sup>	Increased existing strainer surface area from 18.8 ft <sup>2</sup> to 475 ft <sup>2</sup> by installing passive large-capacity suction strainers.	Licensee based analyses on URG and plant specific alternate methods.	NRC determined licensee strainers adequately sized, although inconsistencies and deviations from URG found in licensee analyses.

\* Majority of total insulation of this type.

\*\* Insulation screened out of analysis due to location, e.g., inside biological shield.

## 8.4 Special Considerations for PWR Resolution Options

No special strainer designs have emerged to date in the U.S. for implementation in the PWRs<sup>6</sup>. This section provides some of the considerations, other than the head loss considerations described above, that should be addressed. Data for this subsection has been provided by the Finnish utilities' Imatran Voima Oy (IVO) and Teollisuuden Voima Oy (TVO), the Electric Power Research Institute (EPRI), Performance Contracting Inc (PCI) and Transco Products Inc (TPI). This section was adopted from the CSNI Knowledgebase Report.<sup>8-17</sup>

### 8.4.1 Flow Path Blocking

Clogging or blocking of water pathways that connect locations where water is discharged into the containment and where the sump is located could prevent the free flow of water to the sump. This in turn could significantly alter the water level at the sump and the overall water inventory available for mitigating an accident. Such blockage could also significantly alter flow patterns in or around the sump, with implications to debris transport.

Flow path blocking becomes possible if there are debris interceptors, such as perforated plates, screens, gratings, entryways with grated doors, etc., along the flow path. Such structures can collect insulation debris and other materials behind the obstructing surface. Based on existing data and analyses, flow-path clogging, if it were to occur, would appear more likely at the earlier phases of a large or intermediate LOCA. During this phase, water and steam discharged from the break flows at high velocities through these pathways and would likely transport large pieces of debris (e.g., partially torn insulation blankets or damaged and stripped RMI cassettes) and subsequently depositing significant quantities of debris onto the debris interceptors.

The database for performing flow path clogging evaluations is very limited. In general, the risk of flow path clogging emerges due to the release of larger pieces of insulation blankets, pieces of

<sup>6</sup> As previously discussed, although sump screen modifications were made at one PWR, these modifications did not involve installation of any specialized strainer designs.

metallic insulation cassettes, and as-fabricated fibrous insulation pillows, all of which could float during early stages of the accident. The eventual risk depends on the structure of the pathways and the nature of the insulation employed, which vary considerably from plant to plant. Debris transport data from NRC sponsored tests at University of New Mexico and previously at Alden Research Laboratory provide some of the data on flow conditions required for the transport of larger debris and the potential for them to flip up onto obstructions (discussed in Sections 5 and 6).

### 8.4.2 Strainer Penetration

The purpose of an ECCS suction strainer or a sump screen is to prevent foreign materials from entering sensitive coolant systems. However, some amount of material (fibers, particulates, small metal shreds from metallic insulation, etc.) could potentially penetrate a strainer, particularly during the early stages of an accident, before sufficient debris accumulates on the strainer to effectively filter the smaller debris. If back-flushing or other types of strainer cleaning were to be employed then the cleaned screen would once again be more susceptible to debris penetration as a result of that operation (again note that U.S. BWRs did not select this option). This issue is especially important for current U.S. PWRs because the current sump screen clearances (i.e., mesh spacing) vary considerably, from 1/16-in. to 1-in. All U.S. BWR strainers now have clearances of 1/8-in. or smaller and there is standardization due to GE design control.

This concern can be attested to by the anecdotal information from the Marviken blowdown experiments, which were carried out in a canceled prototype BWR. In these experiments, there was a containment spray to which water was pumped from the containment sumps. The sump screens had 8-mm by 8-mm square holes (relatively large). At the time, the plant used primarily mineral wool insulation. During the first experiments, the insulation debris that passed through the screens clogged the spray nozzles. The experimenters also observed considerable quantities of the debris in the pump casings and other locations in the piping, such as in the valves.

The significance of strainer penetration depends on the types of materials that are present and on

their potential influence on other system components, such as pumps (e.g., damage to pump seals), nozzles (e.g., clogging), or the reactor core, where blockages may also form, subsequently threatening fuel integrity by impairing heat transfer. All these are greatly affected by the properties of the individual particles, which vary substantially among the types of insulation and other materials present in the containment.

The Finnish and Swedish utilities have produced some experimental results on how fibrous insulation debris penetrates a perforated plate.<sup>8-17</sup> These data are shown in Tables 8-3 and 8-4. In the U.S., the BWROG also obtained some data on the debris penetration of a perforated plate.<sup>8-1</sup>

The debris that passes through the strainer proceeds through all components of ECCS or CS systems, that is, through valves, pumps, heat exchangers, and spray nozzles, into the reactor core, and back into the containment. Safety concerns predominantly relate to clogging, but as far as pumps are concerned, there may also be potential for problems with shaft seals, particularly leakage and heatup, which could lead to pump shaft seizure. The survey conducted so far has revealed no data on the possibilities or phenomenology of clogging phenomena in heat exchangers, or reactor internals, excluding the spray nozzles and fuel bundles. Whether a potential for problems exists is completely dependent on the setup of the individual application.

The components that have received attention, spray nozzles and fuel bundles, are discussed in more detail below. Although another component, valves/nozzles in the HPSI lines, received attention, no experimental data is available.

#### 8.4.2.1 Spray Nozzles

Two data points have been reported, one an experiment with nozzles and the other an anecdote of large-scale blowdown experiments.

Tests were performed to determine the potential for NUKON glass fibers to clog a spray nozzle.<sup>8-17</sup> The test apparatus consisted of a small tank, a centrifugal pump, piping and two 3/8-in. (9.5-mm) containment spray nozzles. NUKON blanket parts (glass wool, woven jacket,

nylon looped Velcro and stainless steel hooked Velcro) were cut into pieces ranging from 1 in. to 3 in. (2.5 to 7.5 cm) on a side, placed in the tank, and allowed to pass through the pump to the nozzles. The circulation rate was maintained as close as possible to the nominal nozzle flow rate.

The following general observations were made:

1. "Soft" pieces (without steel) were disintegrated into fine slurry in the pump and as such never caused clogging of the nozzles.
2. The stainless steel hooks and canvas clothing pieces passed through the pump without disintegrating and jammed into the nozzle.
3. When a piece of steel jammed in the nozzle, other components of the fine slurry would buildup behind the jammed steel and cause the nozzle to clog (i.e., caused a noticeable flow reduction and impaired the formation of the nozzle spray cone).

Susceptibility to nozzle clogging would depend on the size of the nozzle (i.e., a smaller nozzle would clog easier than would a larger nozzle) and on the particle density. Even, with a relatively large sized nozzle, clogging can be initiated by millimeter-scale pieces of debris (debris not completely disintegrated while passing through a pump), although such pieces alone may not overly impair the nozzle function. Such debris could subsequently collect finer debris, thereby causing complete or nearly complete blockage of that nozzle. Such clogging phenomenon would likely occur with any combination of fibrous material and other stiff debris (e.g., metallic debris).

#### 8.4.2.2 Fuel Bundles

Four different mechanisms seem to exist that might cause clogging of the core from the debris or other ingredients present in the coolant: thermal adherence to hot surfaces, chemical adherence, hydraulic accumulation, and enrichment due to boiling. The first knowledgebase report<sup>8-17</sup> provides detailed discussions on the effect of debris accumulation on the fuel bundles. Examples of accumulation include fibrous debris accumulation on the fuel bundle spacer grids, between the spacer grids and the rods, and on fuel assembly inlet debris screen, if present.

Table 8-3 Fiber Penetration, 4-mm Perforated Plate <sup>8-17</sup>		
Concentration Per Volume of Water	Total Mass Passed Through Per Strainer Area	Remarks
Mineral Wool (Rockwool) 37 g/m <sup>3</sup> 150 g/m <sup>3</sup>	16 g/m <sup>2</sup> 24 g/m <sup>2</sup>	See Notes 1 & 2
Glass Fibers/Rockwool Mixture, 1:1 by weight 37 g/m <sup>3</sup> 150 g/m <sup>3</sup>	5 g/m <sup>2</sup> 20 g/m <sup>2</sup>	See Notes 1 & 2
<p>Note 1: The "Total Mass" is the total mass of material that the experimenters determined to have passed through the strainer. In the reported experiments,<sup>8-18</sup> a fibrous bed formed on the strainer within three to five min. The experimenters report that no penetration occurs after that.</p> <p>Note 2: The uncertainties in this data are very large, up to a factor of 3 (that is, the mass passed per area may be 3 times larger). Other experiments have yielded even larger penetrations, over 2 kg/m<sup>2</sup>.</p>		

Table 8-4 Fiber Penetration, 4-mm Perforated Plate <sup>8-17</sup>						
Batch Size (kg/ m <sup>2</sup> )	Final Coverage (kg/m <sup>2</sup> )	Period (min)	Mass Passed (g/m <sup>2</sup> )	Penetration Rate* (g/m <sup>2</sup> min)	Note	
Rockwool, Fresh						
0.83	0.83	35	48	1.4	3	
0.83	1.66	30	0	0.0		
1.0	1.0	90	14	0.16	4	
Rockwool, Resin-Free						
0.33	0.33	95	250	2.6		
0.33	0.66	75	190	2.5		
0.33	1.0	60	170	2.8		
1.0	2.0	70	470	6.7		
1.0	3.0	100	610	6.1		
2.0	5.0	25	770	3.1		
0.0	5.0	70	250	3.6		
Totals		495	2710			
Glass Wool, Thermally Aged						
2.0	2.0	25	20	0.8		
2.0	4.0	30	0	0.0		
Remarks:						
* Penetration rate is an average figure, obtained by dividing total passed mass by the period of observation. Instantaneous penetration measurements were attempted but no results are reported.						
Note 3: A strainer segment at 20 kg/m <sup>2</sup> s mass flux was to produce data on this and the next row.						
Note 4: A 1:2 strainer model at 8 kg/m <sup>2</sup> s mass flux was used to generate this row and the rest of the data.						

### 8.4.3 LOCA Jet and Missile Considerations

The threats posed by postulated pipe breaks and other pressure boundary failures on the sump screens should be examined as part of sump screen redesign. The safety concern is that either due to LOCA jet impingement or due to missile impact, the sump screen would be structurally damaged leading to partial or total loss of screening capability. A loss of screening capability would likely result in substantial debris, including potentially large pieces of debris, bypassing the screen.

Research performed so far indicates that LOCA jet impacts can easily cause substantial damage on finer mesh screens. Similarly, research indicates that hard insulations (i.e., reflective metallic insulations and encapsulated mass-type insulations) can become 'hard' missiles and could inflict severe damage on the components located in their proximity. Most of this data is in the form of anecdotal evidence and limited studies performed as part of the BWR resolution.<sup>7</sup>

### 8.4.4 Feasibility and Efficiency of Backflushing

Several European and U.S. experiments were carried out to examine feasibility and efficiency of backflushing. Two types of backflushing techniques were used: (1) compressed air injection and (2) water flow reversal. In both cases to carry out the backflushing procedure, it was necessary to terminate suction from the strainer and restart the flow after the backflushing process was completed. Head loss was measured both before and after the backflushing to examine efficiency of the backflush procedure. The experimental observations can be summarized as follows:

- Strainer clogging due to reflective metallic insulation debris was effectively mitigated by backflushing. Typically the RMI fragments tended to fall off when the flow was terminated. The few left over pieces were easily backflushed. Soon after completing the backflush procedure, the pressure differential was nearly zero but it steadily

increased again as the freed debris gradually accumulated back onto the strainer subsequently reaching the original differential pressure.

- Backflushing was also effective for removing fibrous debris from the strainers. In this case, fibrous debris fell off in chunks and some of this debris did not accumulated back onto the strainers; thus efficiency of backflushing was high for fibrous debris.
- Backflushing systems were not very effective where beds of mixed fibrous and RMI or fibrous and particulate debris were present. Particularly, backflushing of an essentially vertical surface (e.g., that in existing PWR sumps) was not very effective for mixed debris beds. This is due to the fact that only a small fraction of the strainer surface through which flow exits is cleared of debris. In the case of an air-based backflush system, the clearing occurred at the top of the strainer and in the case of water-based system, the clearing occurred where the majority of the water exited the screen. It was also observed that the debris tended to accumulate once again on the strainer surface, and this accumulated debris caused a higher head loss than did the original bed.

### 8.4.5 Debris Induced Mechanical Structural Loadings

The pressure differential caused by a bed of debris that has accumulated on a sump screen or suction strainer (including the flow resistance of the clean screen or strainer) would induce a mechanical strain on the structure. Should the sump screen or suction strainer fail mechanically, its function could be compromised, perhaps increasing the overall resistance to flow, or perhaps allowing debris to bypass the screen. For example, after the suction strainers at the Perry plant became clogged with fibers and corrosion products, the strainers were found upon inspection to be deformed, apparently from excessive differential pressure (Section 9.2). Appropriate engineering evaluations should be performed to ensure that these structures are strong enough to stand up to the increased mechanical loads of debris accumulation.

<sup>7</sup> This issue was not a concern for BWR plants with the strainers located in the suppression pool where the strainers are protected from this type of damage.

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## 9.0 SIGNIFICANT EVENTS

This section describes operational events that have occurred at both PWR and BWR nuclear power plants that relate to the issue of sump-screen or suction-strainer blockage. These events are described in the general order of their relative severity, starting with operational events that have rendered systems inoperable with regard to the systems' ability to complete their safety mission. Two of these events resulted in the generation of insulation debris by jet flow from a LOCA caused by the unintentional opening of safety relief valves (SRVs). (See Section 9.1) Other events have involved the accumulation of sufficient operational debris to effectively block a strainer or screen or to plug a valve. (See Section 9.2.) Some event reports simply noted debris found in the containment (Section 9.3) and inadequate maintenance that would likely cause potential sources of debris within the containment (Section 9.4). Related event reports identified inadequacies in a sump screen where debris potentially could bypass the screen and enter the respective system. (See Section 9.5.)

### 9.1 LOCA Debris Generation Events

The two LOCA events that generated insulation debris both involved the unintentional opening of SRVs; these occurred at:

1. the German reactor Gundremmingen-1 (KRB-1) in 1977,<sup>9-1</sup> where the 14 SRVs of the primary circuit opened during a transient and,
2. the Barsebäck-2 nuclear power plant on July 28, 1992,<sup>9-1</sup> during a reactor restart procedure after the annual refueling outage.

Both of these reactors were BWR reactors with similarities to US reactors. These events are compared in Table 9-1 and summarized below.

#### Incident at Gundremmingen Unit 1

An event occurred at the German BWR reactor Gundremmingen-1 (KRB-1) in 1977 in which the 14 SRVs of the primary circuit opened during a transient. The SRVs were located inside the containment at a pipe attached to the main steam line between the reactor pressure vessel and the high-pressure turbine. The valves blew directly into the surrounding containment, where

the pipes had been insulated with fiberglass insulation reinforced with wire mesh and jacketed with sheet zinc. The piping insulation was extensively damaged.

After the incident, approximately 450 m<sup>3</sup> (16,000 ft<sup>3</sup>) of water was found in the sump, of which about 240 m<sup>3</sup> (8500 ft<sup>3</sup>) originated from the coolant circuit, with the rest delivered by the containment spray system. This water transported a substantial quantity of insulation debris into the control drive mechanism compartment directly below the SRVs. The floor was covered with flocks of insulation material. No larger parts of the insulation, such as sheet metals or textiles, were transported there. A thick layer of fiberglass insulation debris was found at strainers installed in front of ducts leading from this compartment into the sump. Because recirculation from the sump was not required, the layer of insulation debris on the strainers had no further consequences. Therefore, it is not known whether recirculation from the sump was possible. No details regarding debris quantities generated and transported were made available for further analysis. Nevertheless, the potential for clogging recirculation strainers with insulation debris generated by an operational incident was clearly demonstrated.

#### Incident at Barsebäck Unit 2

An event occurred at the Barsebäck-2 BWR nuclear power plant on July 28, 1992, during a reactor restart procedure after the annual refueling outage. The reactor power was below 2% of nominal power when an SRV opened inadvertently because of a leaking pilot valve. The main valve opened when the reactor pressure had reached 3.0 MPa (435 psia). The steam was released as a jet directly into the containment. The containment is basically an upright cylinder with the drywell in the upper part and the wetwell directly beneath. Vertical pressure relief pipes connect the drywell and wetwell and their openings (covered by gratings) are flush with the drywell floor. Because the containment was isolated when the drywell became pressurized, the water in the blowdown pipes from the drywell into the wetwell was forced from the pipes, allowing steam/air to flow through the pipes into the suppression pool.

Year	Plant (Type)	Event Initiator	Debris	Consequence	Reference
1977	Gundremmingen Unit 1 (BWR)	Unintentional opening of 14 SRVs.	Fiberglass insulation debris.	Potential clogging of recirculation strainers.	NEA/CSNI/R (95) 11 <sup>9-1</sup>
1992	Barsebäck Unit 2 (BWR)	Unintentional opening of a safety valve.	Metal-jacketed mineral wool insulation debris.	Clogged two of five spray-system suction strainers with loss of containment sprays at 1 h.	NEA/CSNI/R (95) 11 <sup>9-1</sup> IN-92-71 <sup>9-2</sup> IN-93-02 (S1) <sup>9-3</sup>

The containment vessel spraying system and the ECCS were started automatically.

About 200 kg (440 lb) of fibrous insulation debris was generated, and about 50% of this debris subsequently reached the wetwell, resulting in a large pressure loss at the strainers about 70 min after the beginning of the event. Gratings in the drywell did not hold back the insulation material effectively. The insulation debris was distributed within the drywell following the event approximately as follows.

- 50% on the framework with the debris mainly concentrated in three areas: inside the drywell "gutter," near the outer containment wall, and on or near the grid plates over the blowdown pipes
- 20% on the wall next to the affected pipe, from which most of the insulation originated, and on the components around the safety valve
- 10% on the wall opposite the affected pipe
- 12% on the walls above the grating lying above the safety valve
- 8% on the grating above the safety valve

The debris was transported by steam and airflow generated by the blowdown and by water from the containment spray system. It could not be determined how the transport developed with respect to time and whether the blowdown or washdown processes transported the major part of the debris found in the wetwell.

The generation and transport of large amounts of fibrous debris by the simple erroneous opening of a safety valve were observed. The debris transport included the short-term transport caused by the steam and air blast and the longer term debris washdown transport associated with the operation of the containment spray system. The extent of damage and of transport appeared remarkably large given the small leak size and low reactor pressure. The

significance of inertial impaction as a deposition mechanism was apparent upon examining the locations of debris deposited near the break.

## 9.2 Events Rendering a System Inoperable

In operating PWR and BWR nuclear power plants, events have occurred that resulted in a particular system being rendered inoperable; i.e., the ability of that system to perform its safety-related mission was in considerable doubt. These events include the accumulation of debris on a strainer or a screen that caused excessive head loss and events in which debris entered a system and thereby adversely affected the operability of a component of that system. These events, which occurred at PWR and BWR nuclear plants within the U.S., are compared in Table 9-2 and summarized below.

### Grand Gulf

The Grand Gulf Nuclear Station experienced strainer-blockage events on March 18, 1988, and July 2, 1989.<sup>9-4</sup> Both events occurred during testing of the RHR pumps. Pump suction pressures fell below the in-service inspection acceptance criteria. The licensee determined that a clogged strainer that takes suction from the suppression pool caused the low suction pressure.

### Trojan

Debris and problems with the sump screen were found at the Trojan plant on several occasions.<sup>9-5</sup>

1. On July 8, 1989, the licensee of the Trojan plant discovered numerous items in the containment sump.
2. On July 14, 1989, after the containment was supposedly ready to be closed for operation, an NRC inspector and the licensee found additional debris.

Table 9-2 Events Rendering a System Inoperable					
Year	Plant (Type)	Event Initiator	Debris	Consequence	Reference
1988	Grand Gulf (BWR Mark III)	Inspection	Plastic wrap and other debris.	Clogged RHR strainers.	IN-93-34 <sup>9-4</sup>
1989	Grand Gulf (BWR Mark III)	Inspection	Plastic wrap and other debris.	Debris could potentially block ECCS strainers during LOCA.	IN-93-34 <sup>9-4</sup>
1989	Trojan (PWR Dry)	Inspection	Numerous debris items found in the sump. Sections of screen missing, damaged, or did not agree with drawings. Welding rod jammed in RHR pump impeller.	Debris blocked one pump and could potentially have blocked other ECCS strainers during LOCA.	IN-89-77 <sup>9-5</sup>
1992	H. B. Robinson (PWR Dry)	Mode 4 hot shutdown operations surveillance testing of safety injection pumps.	Small piece of plastic blocked in-line orifice. Plastic used in a modification of RHR system.	Pumps rendered inoperable and loss of recirculation flow.	IN-92-85 <sup>9-6</sup>
1992	Perry (BWR Mark III)	Inspection	Operational debris and a coating of fine dirt. Water samples found fibrous material and corrosion products.	Clogged and deformed strainers.	IN-93-02 <sup>9-7</sup> IN-93-34 <sup>9-4</sup>
1992	Point Beach Unit 2 (PWR Dry)	Quarterly test of containment spray pumps.	Foam rubber plug.	Debris blocked pump impeller suction. One train of SI piping rendered inoperable in recirculation mode.	IN-92-85 <sup>9-6</sup>
1993	Perry (BWR Mark III)	Several SRVs were manually lifted and RHR used for suppression pool cooling.	Glass fibers (from temporary cooling filters), corrosion products, dirt, and misc. debris.	Clogged and deformed strainers	IN-93-02 <sup>9-7</sup> IN-93-34 <sup>9-4</sup>
1994	Palisades (PWR Dry)	Inspection	Plastic material.	HPSI and CS system pumps declared inoperable.	IN-95-06 <sup>9-8</sup>
1994	Quad Cities Unit 1 (BWR Mark I)	Post-maintenance test.	Plastic bag and other miscellaneous operational debris.	Plugged valve on RHR torus cooling system. Pump fouled by metallic debris wrapped around a vane.	IN-94-57 <sup>9-9</sup>
1995	Limerick Unit 1 (BWR Mark II)	Unexpected opening of SRV at 100% power.	Polymeric fibers and sludge.	RHR Loop A suction strainer (suppression pool cooling mode) covered by thin mat of fibers and sludge. Loop B to a lesser extent. Cavitation indicated on Loop A.	IN-95-47 <sup>9-10</sup> NRCB-95-02 <sup>9-11</sup>

3. On July 17, 1989, the top sump screen and portions of the inner sump screen were found to be missing.
4. On July 19, 1989, the NRC identified additional missing and damaged inner sump screens.
5. Debris had been found in the Trojan sump previously during a 1988 outage.
6. In 1980, a welding rod between the impeller and the casing ring jammed an RHR pump, clearly demonstrating the safety significance of loose debris in the containment emergency sump.

#### H. B. Robinson

On August 23, 1992, personnel at the H. B. Robinson plant were performing an operational surveillance test of the Train-B safety injection (SI) pump while the reactor was in Mode 4 hot shutdown.<sup>9-6</sup> The recirculation flow in this test was 20% lower than it had been when last measured on July 12, 1992. The licensee retested this pump on August 24, 1992, and found no recirculation flow. Then, the licensee also tested the Train-A SI pump and found its recirculation flow 10% lower than last measured. Subsequently, the licensee declared both pumps inoperable and took the reactor to cold shutdown. On August 25, 1992, the licensee removed a single piece of plastic about the size of a nickel from the in-line orifice. The licensee previously had declared the Train-B SI pump inoperable after a quarterly in-service inspection surveillance test measured a recirculation flow of about 3 gpm rather than the required 35 gpm. On July 9, 1992, the licensee had found debris obstructing the in-line orifice. The licensee had subsequently flushed the Train-B SI pump, verified the recirculation flows as acceptable, and returned the unit to service believing that all debris had been removed. However, on August 24, 1992, the licensee found no recirculation flow.

#### Perry

Two ECCS suction-strainer clogging events occurred at the Perry plant.<sup>9-4</sup> On May 22, 1992, debris was found on the suppression pool floor and on the RHR suction strainers during a refueling outage inspection. The debris consisted of general maintenance-type material and a coating of fine dirt that covered most of the surface of the strainers and the pool floor. After cleaning the strainers, it became evident that both the Train-A and Train-B RHR strainers were deformed, apparently from excessive

differential pressure. After the licensee cleaned the suppression pool and replaced the strainers, another event occurred at the plant in March 1993, where several SRVs were lifted manually and the RHR was used to cool the suppression pool. The strainers subsequently were inspected and were again coated with debris. A test of the Train-B RHR strainer in the as-found condition was terminated when the pump suction pressure dropped to 0. The debris on the strainers consisted of glass fibers (temporary drywell cooling filters inadvertently dropped into the suppression pool), corrosion products, and other materials filtered from the pool water by the glass fibers adhering to the strainer surfaces.<sup>9-12</sup> Fibrous material acted as a filter for suspended particles, a phenomenon not previously recognized. This event suggested that the filtering of small particles, such as suppression pool corrosion products (sludge), by the fibrous debris would result in significantly increased pressure drop across the strainers.

#### Point Beach Unit 2

On September 28, 1992, during a quarterly test of the containment spray pumps and valves, the licensee noted that the discharge pressure for the Train-A train pump was zero and that the pump was making an abnormal noise.<sup>9-6</sup> The test was stopped and the pump was declared inoperable. Upon disassembly of the pump, a foam-rubber plug was found to be blocking the impeller suction.

#### Palisades

On April 28, 1994, with the reactor in cold shutdown, the licensee determined that plastic material used inside containment could block the containment sump screens after a design-basis accident.<sup>9-8</sup> The licensee declared the high-pressure safety injection pumps and the containment spray pumps inoperable.

#### Quad Cities Unit 1

On July 14, 1994, during a post-maintenance test of RHR Loop A, test data indicated that the RHR torus cooling/test return valve was plugged.<sup>9-9</sup> The shredded remains of a plastic bag were found within the anti-cavitation trim. The majority of the material was found lodged on the suction side of the valve trim. After the July 14 event, the licensee observed reduced flow from the RHR Loop C pump. Upon further investigation, the licensee found a 10-cm-diameter wire-brush wheel and a piece of metal wrapped around a vane of the pump.

#### Limerick Unit 1

On September 11, 1995, an event occurred at the Limerick Generating Station, Unit 1 in which an SRV opened on Unit 1 while it was at 100% power.<sup>9-10</sup> Before the SRV opened, Limerick had been running Loop A of the RHR in suppression-pool cooling mode. The operators initiated a manual scram in response to the SRV opening and a second loop (Loop B) of suppression pool cooling. Approximately 30 min later, fluctuating motor current and flow were observed on Loop A. The cause was believed to be cavitation, and Loop A was secured. Following the event, inspection by a diver revealed a thin mat of material covering the strainer of Loop A. The mat consisted of fibrous material and sludge. The Loop B strainer had a similar covering but to a lesser extent. Limerick subsequently removed about 635 kg of debris from the pool. Similar to the Perry events, the mat of fibers on the strainer surface converted the strainer into a filter, collecting sludge and other material on the strainer surface.

### **9.3 Debris-Found-in-Containment Events**

In operating PWR and BWR nuclear power plants, events have occurred in which debris was found inside the containment, and that debris had the potential to impair the operability of a safety system. These events are listed in Table 9-3 and summarized below.<sup>1</sup> The debris included fibrous material, sludge, dirt, paint chips, and miscellaneous operational materials. Even if the debris was not considered sufficient to render a system inoperable, it could still contribute to screen blockage following a LOCA.

#### Haddam Neck

In July 1975, six 55-gal. drums of sludge with varying amounts of debris were removed from the ECCS sump.<sup>9-13</sup> In 1996, five 55-gal. drums of sludge were removed from the ECCS sump that included the following miscellaneous debris: plastic sheeting, nuts, bolts, tie wraps, and pencils. Discrepancies in the sump-screen sizing, screen fit-up, and method of attachment also were discovered.

<sup>1</sup>The list is not comprehensive; i.e., inspection reports have noted other less significant discoveries of minor sources of debris that are not reported here.<sup>9-13</sup>

#### Surry Units 1 and 2

On June 16, 1988, following a recirculation flow verification test, loose parts and debris were found in the containment sump, the recirculation pumps, and the suction piping.<sup>9-5</sup> Some of the items were large enough to have caused enough pump damage or flow degradation to render the system inoperable. In addition, some of the sump screens were found to have gaps, which could have allowed additional loose material to enter the sump. One screen section was found to be missing.

#### Diablo Canyon Units 1 and 2

In 1989, debris was found in the sumps of both Unit 1 and Unit 2.<sup>9-5</sup> Further, the sump screens were not configured in accordance with the FSAR drawing, and plant inspection requirements were not sufficient or detailed enough to assure adequate inspections.

#### McGuire Unit 1

Loose material discovered in upper containment before entry into Mode 4.<sup>9-13</sup>

#### North Anna

As part of the steam-generator replacement program, personnel removed the mirror insulation from the SGs and discovered that most of the unqualified silicon aluminum paint covering the SGs had come loose from the exterior surfaces and was being supported only by the insulation jacketing.<sup>9-4</sup> The pieces of paint ranged in size from dust particles to sheets 0.61 m (2 ft) wide. The same paint also had been used on the pressurizer and was also loose. The quantity of this coating in containment was significant—estimated at 1,087 m<sup>2</sup> (11,700 ft<sup>2</sup>). Paint fragments potentially could have reached the containment sump during a design-basis accident in which a pipe breach could have exposed the failed coating.

#### Spanish PWR

An inspection of the containment sumps during an outage surveillance found water in the sump that was unusually dirty.<sup>9-14</sup> The water was a result of acceptable leakage during a functional testing of a three-way valve connecting the ECCS borated tanks with the containment sumps. After the water was removed, three of the four sumps had debris in the bottom below the suction pipe for the ECCS. A closer examination of the ECCS suction lines revealed

Year	Plant (Type)	Event Initiator	Debris	Consequence	Reference
1975	Haddam Neck (PWR Dry)	Inspection	Six 55-gal. drums of sludge with varying amounts of other debris removed from ECCS sump.	Debris potentially could block ECCS strainers during a LOCA.	GL-98-04 <sup>9-13</sup>
1988	Surry Units 1 and 2 (PWR Sub)	Inspection	Construction materials and debris found in the sump, in cone strainer of recirculation spray system, and in recirculation pumps.	Materials could have rendered system inoperable.	GL-98-04 <sup>9-13</sup> IN-89-77 <sup>9-5</sup>
1989	Diablo Canyon Units 1 and 2 (PWR Dry)	Inspection	Debris found in sumps.	Debris could potentially block ECCS strainers during LOCA.	GL-98-04 <sup>9-13</sup> IN-89-77 <sup>9-5</sup>
1990	McGuire Unit 1 (PWR Ice)	Inspection	Loose material discovered in upper containment.	Material not likely to have made ECCS inoperable but debris could contribute to potential ECCS strainer blockage.	GL-98-04 <sup>9-13</sup>
1993	North Anna (PWR Sub)	Steam Generator Replacement	Most of the unqualified silicon aluminum paint had come loose from SG and pressurizer and supported only by insulation jacketing.	Paint fragments potentially could reach sump during a LOCA.	IN-93-34 <sup>9-4</sup>
1993	Spanish Plant (PWR)	Inspection	Unspecified debris (believed debris had been there since commissioning), dirty sump water, and flow blockage.	ECCS lines taking suction from the sumps were partially blocked.	IN-96-10 <sup>9-14</sup>
1994	Browns Ferry Unit 2 (BWR Mark I)	Inspection	Cloth-like material.	Partial strainer blockage, potential for 25% blockage	IN-95-06 <sup>9-8</sup>
1994	LaSalle Unit 1 (BWR Mark II)	Inspection	Assortment of operational debris and sludge.	Potentially contribute to strainer blockage.	IN-94-57 <sup>9-9</sup>
1994	River Bend (BWR Mark III)	Inspection	Miscellaneous operational debris and sediments. Plastic bag removed from RHR suction strainer.	Potentially contribute to strainer blockage.	IN-94-57 <sup>9-9</sup>
1996	Haddam Neck (PWR Dry)	Outage Maintenance	Five 55-gal. drums of sludge with varying amounts of other debris removed from ECCS sump.	Debris could potentially block ECCS strainers during a LOCA.	GL-98-04 <sup>9-13</sup>
1996	LaSalle Unit 2 (BWR Mark II)	Outage suppression pool cleaning.	Miscellaneous operational debris and sludge.	Suppression pool debris could potentially block ECCS strainers during a LOCA.	IN-96-59 <sup>9-15</sup>
1996	Millstone Unit 3 (PWR Sub)	Inspection	Pieces of Arcor protective coating and mussel shell fragments. Construction debris found in recirculation spray system suction lines.	Potential failure of recirculation spray heat exchangers to perform specified safety function because of debris.	GL-98-04 <sup>9-13</sup> IN-97-13 <sup>9-16</sup>

Year	Plant (Type)	Event Initiator	Debris	Consequence	Reference
1996	Nine Mile Point Unit 2 (BWR Mark II)	Inspection	Miscellaneous operational debris, including foam rubber, plastic bags, Tygon tubing, and hard hats.	Suppression pool debris potentially could block ECCS strainers during a LOCA.	IN-96-59 <sup>9-15</sup>
1996	Vogtle Unit 2 (PWR Dry)	Inspection	Loose debris identified inside containment.	Debris could potentially block ECCS strainers during LOCA.	GL-98-04 <sup>9-13</sup>
1996	Zion Unit 2 (PWR Dry)	Inspection	Extensive failure of protective coatings. Unqualified coatings identified. Miscellaneous debris found throughout containment.	Debris could potentially block ECCS strainers during LOCA.	IN-97-13 <sup>9-16</sup>
	Calvert Cliffs Units 1 and 2 (PWR Dry)	Inspection	Unit 2 sump contained 11.3 kg (25 lb) of dirt, weld slag, pebbles, etc. Unit 1 had less than 1 lb debris.	Debris could contribute to potential ECCS strainer blockage.	GL-98-04 <sup>9-13</sup>
	D. C. Cook Units 1 and 2 (PWR Ice)	Inspection	Fibrous material found in containments.	Debris potentially could block ECCS strainers during LOCA.	GL-98-04 <sup>9-13</sup>

that two of the four ECCS lines taking suction from the sumps were partially blocked by debris and one of those lines had almost half of its flow area blocked. It is believed that the debris had been there since the plant was commissioned, thereby demonstrating a significant failure of the surveillance program.

#### Browns Ferry Unit 2

On October 10, 1994, divers discovered numerous pieces of cloth-like material on the bottom of the torus and on the ECCS strainers.<sup>9-8</sup> The pieces were typically 25 cm<sup>2</sup> (4 in.<sup>2</sup>) in size, but smaller pieces were found, as well. The material was pieces of absorbent paper towels that are sometimes used inside the containment for maintenance and cleaning purposes. One of the two strainers was found with about 15% of its surface covered with debris. If all of the material had been drawn onto the strainers, about 25% of the strainer surface area would have been blocked.

#### LaSalle Unit 1

On April 26 and May 11, 1994, while in a refueling outage, two dives were made into the Mark II design suppression pool to clean the ECCS suction strainers of a small amount of debris, which caused less than 1% clogging.<sup>9-9</sup> The divers found and removed an assortment of operational debris that included a hard hat, a

pair of anti-contamination coveralls, four lengths of Tygon tubing ranging in length from about 6 m (20 ft) to 15.2 m (50 ft), three nuts, a 4.6-m (15-ft) length of duct tape, four lengths of 1.9-cm (3.4-in.) hose ranging in length from about 8 m (20 ft) to 46 m (150 ft), a length of wood measuring 5 cm by 10 cm (2 in. by 4 in.), and a flashlight. The divers also noted that sediment had formed on the floor of the suppression pool ranging in thickness from 0.3 cm to 5 cm (1/8 to 2 in.). An analysis of a sample of the sediment showed a filterable solid that consisted of over 99% iron oxide with trace amounts of nickel, copper, and chrome. The licensee concluded that the sample contained normal system corrosion products.

#### River Bend

On June 13, 1994, a refueling outage inspection of the ECCS suction strainers and the Mark III design suppression pool discovered 16 foreign objects.<sup>9-9</sup> One of these objects, a plastic bag, was removed from an RHR system suction strainer. The other objects removed from the pool included a hammer, a grinder wheel, a slugging wrench, a socket, a hose clamp, a bolt, a nut, a step-off pad, two ink pens, an antenna, a scaffold knuckle, a short length of rope, and used tape. The licensee also found sediment in the suppression pool.

### LaSalle Unit 2

The licensee reported on October 16, 1996, that a significant amount of foreign material had been found under a layer of rust-particle sludge during the first thorough cleaning the suppression pool.<sup>9-15</sup> Foreign material also was found in several downcomers that included a rubber mat, a sheet of gasket material, a nylon bag, and sludge.

### Millstone Unit 3

On July 25, 1996, the licensee reported that about 20 pieces of Arcor were found in the Train-A recirculation spray heat exchangers.<sup>9-13, 9-16</sup> Arcor is a coating material that was applied to the inside surfaces of the service water system piping. The Arcor chips were apparently swept into the recirculation spray heat exchanger channel during testing. The licensee also found 40 to 50 mussel shell fragments in the heat exchangers. The Arcor chips and mussel fragments were relatively small (on the order of 1 in.<sup>2</sup>). The licensee determined that the debris could have prevented the heat exchangers from performing their specified safety function. In addition, construction debris was discovered in all four containment recirculation spray system (RSS) suction lines. In addition, gaps were found in the RSS sump cover plates.

### Nine Mile Point Unit 2

On October 17, 1996, the licensee reported that a significant amount of debris was found during inspection of the drywell vent downcomers to the suppression pool.<sup>9-15</sup> Almost all of the debris was found in 17 of the downcomers. Some of the debris was floating on the water inside the downcomers and consisted of foam rubber cleanliness covers, plastic bags, Tygon tubing, and hard hats. Cleanliness covers were installed over the openings into seven of the downcomers located directly under the reactor vessel. The suppression pool had been cleaned during the previous refueling outage.

### Vogtle Unit 2

In 1996, NRC inspectors identified loose debris in readily accessible areas inside the containment that had the potential to block emergency sump screens during accident conditions.<sup>9-13</sup> An evaluation by the licensee concluded that the RHR pump would not have had adequate NPSH because of the debris.

### Zion Unit 2

In November 1996, the licensee found that 40% to 50% of the concrete floor coatings showed extensive failure as a result of mechanical damage and wear, and that about 5% of the coating associated with the concrete wall and liner plate was degraded.<sup>9-16</sup> Unqualified coatings had been applied to various surfaces, including instrument racks, struts, charcoal filter housings, valve bodies, and piping. Although adhesion tests showed acceptable adhesion strength in most of the locations tested, one test conducted on an unqualified coating system did not satisfy the acceptance criteria. Documentation was not found for over-coating (i.e., touch-up work) that had been applied to many of the liner plates and concrete wall surfaces.

### Calvert Cliffs Units 1 and 2

An inspection of the Unit 2 sump found 11.3 kg (25 lb) of debris that consisted of dirt, weld slag, pebbles, etc.<sup>9-13</sup> An inspection of the Unit 1 sump found less than 1 lb of debris. The debris had the potential to cause minor damage to the ECCS pumps.

### D. C. Cook Units 1 and 2

Enough fibrous material was found in both Unit 1 and Unit 2 containments to potentially cause excessive blockage of the recirculation sump screens during the recirculation phase of a LOCA.<sup>9-13</sup>

## **9.4 Inadequate Maintenance Leading to Potential Sources of Debris**

In operating PWR and BWR nuclear power plants, events have occurred in which inadequate maintenance conditions inside containments could potentially form significant sources of debris. These events are listed in Table 9-4 and summarized below.<sup>2</sup> In general, these events involved unqualified protective coatings and materials.

### North Anna Units 1 and 2

In 1984, unqualified paint was identified on galvanized ductwork.<sup>9-13</sup>

<sup>2</sup>The list is not comprehensive; i.e., inspection reports have noted other less significant discoveries of inadequate maintenance potentially leading to sources of debris that are not reported here.<sup>9-13</sup>

<b>Year</b>	<b>Plant (Type)</b>	<b>Event Initiator</b>	<b>Debris</b>	<b>Consequence</b>	<b>Reference</b>
1984	North Anna Units 1 and 2 (PWR Sub)	Inspection	Unqualified coatings identified	Debris could potentially block ECCS strainers during LOCA.	GL-98-04 <sup>9-13</sup>
1988	Susquehanna Unit 2 (BWR Mark II)	Inspection	Extensive delamination of aluminum foil jacketing fiberglass insulation.	Debris could potentially block ECCS strainers during LOCA.	IN-88-28 <sup>9-17</sup>
1993	Sequoyah Units 1 and 2 (PWR Ice)	Inspection	Unqualified coatings identified	Debris could potentially block ECCS strainers during LOCA.	GL-98-04 <sup>9-13</sup> IN-97-13 <sup>9-16</sup>
1994	Browns Ferry Units 1, 2, & 3 (BWR Mark I)	Inspection	Unqualified coatings identified	Debris could contribute to potential ECCS strainer blockage.	GL-98-04 <sup>9-13</sup>
1995	Indian Point Unit 2 (PWR Dry)	Inspection	Failure of protective coatings. Unqualified coatings identified.	Debris could potentially block ECCS strainers during LOCA.	IN-97-13 <sup>9-16</sup> GL-98-04 <sup>9-13</sup>
1997	Clinton (BWR Mark III)	Inspection	Unqualified coatings identified	Debris could potentially block ECCS strainers during LOCA.	GL-98-04 <sup>9-13</sup>
1997	Millstone Unit 1 (BWR Mark I)	Inspection	Unqualified coatings identified	Debris could potentially block ECCS strainers during LOCA.	GL-98-04 <sup>9-13</sup> IN-88-28 <sup>9-17</sup>
1997	Sequoyah Units 1 (PWR Ice)	Inspection	Oil cloth introduced into containment.	Potential to block one or both refueling drains.	GL-98-04 <sup>9-13</sup>

#### Susquehanna Unit 2

On March 14, 1988, during a refueling outage inspection, the licensee observed and reported extensive delamination of the aluminum foil coating on the surface of the fiberglass insulation used on valve bodies and pipe hangers and in other areas that are awkward or difficult to insulate.<sup>9-17</sup> The licensee was concerned that this deterioration of drywell insulation could form debris that potentially could block the ECCS strainers during a LOCA. The licensee estimated that 50% of up to 5000 ft<sup>2</sup> of this insulation had undergone some degradation. The aluminum foil covering was 1-mil thick and was bonded to the outer covering of Alpha Maritex fiberglass cloth that covered Temp-Mat insulation.

#### Sequoyah Units 1 and 2

On October 18, 1993, the licensee reported unidentified coatings were used on the exterior surfaces of reactor coolant pump motor support structures.<sup>9-13, 9-16</sup> These structures are all

located within the containment sump "zone-of-influence" at both units. The design-basis limit for unqualified coatings inside the containment had been exceeded. Then, during a shutdown on March 22, 1997, an oil cloth was introduced into containment. If it had come free, it could have blocked one or both refueling drains so that water in the upper containment might not have flowed freely to the lower level of containment, where the sump is located.

#### Browns Ferry Units 1, 2, and 3

Unqualified coatings were identified on the T-quenchers in the suppression pool.<sup>9-13</sup>

#### Indian Point Unit 2

On March 10, 1995, the licensee reported that paint was peeling from the containment floor. The paint had been applied improperly.<sup>9-16</sup> The factors contributing to the delamination of the paint were: (1) the paint thickness exceeded the manufacturer's specifications by up to twice the allowed thickness; (2) there was excessive paint

shrinkage caused by use of too much paint thinner; (3) the surface had not been cleaned and prepared properly before the paint was applied; and (4) appropriate inspection and documentation requirements were not implemented.

#### Clinton

On July 15, 1997, the licensee reported that a significant quantity of degraded protective coating was removed from the containment.<sup>9-13</sup> Significant degradation occurred in the wetwell, and some degradation occurred in the drywell. The licensee stated that because of the indeterminate condition of these degraded coatings, reasonable assurance could not be given that the coatings would not disbond from their substrates enough to clog the ECCS suction strainers during accident conditions.

#### Millstone Unit 1

On April 16, 1997, the licensee reported that most of coating work inside the suppression pool torus was unqualified. The licensee stated that a number of different coating materials had been used inside the torus, but the locations and extent of various coating systems were unclear. The operability of the low-pressure coolant injection and core spray systems could be affected.<sup>9-13</sup>

### **9.5 Sump-Screen Inadequacies**

In operating PWR and BWR nuclear power plants, events have occurred in which defects in the integrity of the sump screens were found. These defects could have caused a potential failure to adequately filter the ECCS water source that could result in degradation and eventual loss of ECCS function as a result of damaged pumps or clogged flow pathways. These events are listed in Table 9-5 and summarized below.<sup>3</sup>

#### Milestone Unit 1

In 1988, when the criteria of RG 1.82 Revision 1 were applied to plant safety analyses, it was determined that the existing suction strainers were too small.<sup>9-13</sup> Strainers were replaced with larger strainers.

<sup>3</sup>The list is not comprehensive; i.e., inspection reports have noted other, less significant discoveries of sump screen inadequacies that are not reported here.<sup>9-13</sup>

#### Three Mile Island Unit 1

In 1990, holes were discovered in the top of the sump screen cage that were attributed to a modification of the sump access hatches.<sup>9-13</sup>

These breaches represented a potential failure to adequately filter the ECCS water source that could result in degradation and eventual loss of ECCS function as a result of damaged pumps or clogged flow pathways.

#### Arkansas Nuclear One Unit 1

On October 1, 1993, personnel found several breaches in the integrity of the containment sump.<sup>9-18</sup> These breaches included the following:

1. 22 semicircular holes (scuppers) approximately 15.2 cm (6 in.) in diameter at the base of the sump curb (shown in original drawings).
2. Four conduit penetrations in the sump screen, totaling approximately 930 cm<sup>2</sup> (1 ft<sup>2</sup>).
3. A small conduit penetration in the sump curb, approximately 2.5 cm (1 in.) in diameter.
4. Two defects in the screen mesh covering the sump.
  - a. An L-shaped cut approximately 30.5 cm by 35.6 cm (12 in. by 14 in.).
  - b. A straight cut approximately 30.5 cm (12 in.) long.
5. Drain headers ranging in size from approximately 5.1 cm to 25.4 cm (2 in. by 10 in.) that lacked protective screen material.

These breaches represented a potential failure to adequately filter the ECCS water source, which could result in degradation and eventual loss of ECCS function as a result of damaged pumps or clogged flow pathways.

#### Arkansas Nuclear One Unit 2

In 1993, seven unscreened holes were discovered in masonry grout below the screen assembly of ECCS sump.<sup>9-18</sup> These breaches represented a potential failure to adequately filter the ECCS water source, which could result in degradation and possible eventual loss of both trains of HPSI and containment spray.

#### San Onofre Unit 1

In 1993, an irregular annular gap was found that surrounded a low-temperature overpressure discharge line that penetrated a horizontal steel

Table 9-5 Events Where Inadequacies Found in Sump Screens					
Year	Plant (Type)	Event Initiator	Screen Condition	Consequence	Reference
1988	Millstone Unit 1 (BWR Mark I)	Safety Analysis	Existing suction strainers too small when criteria of RG 1.82, Rev. 1 applied.	Potential screen blockage due to accumulation of debris.	GL-98-04 <sup>9-13</sup>
1990	Three Mile Island Unit 1 (PWR Dry)	Inspection	Modification of sump access hatches left holes in top of sump screen cage.	Potential debris bypass of the sump screens and subsequent potential damage to pumps or clogged spray nozzles.	GL-98-04 <sup>9-13</sup>
1993	Arkansas Nuclear One Unit 1 (PWR Dry)	Inspection	Several breaches found in sump screens.	Potential debris bypass of the sump screens and subsequent potential degradation or even loss of ECCS function.	IN-89-77 Sup. 1 <sup>9-18</sup>
1993	Arkansas Nuclear One Unit 2 (PWR Dry)	Inspection	Seven unscreened holes found in masonry grout below screen assembly of ECCS sump.	Potential debris bypass of the sump screens and subsequent potential degradation of both trains of HPSI and containment spray.	GL-98-04 <sup>9-13</sup> IN-89-77 Sup. 1 <sup>9-18</sup>
1993	San Onofre Units 1 and 2	Inspection	Irregular annular gap surrounding low-temperature over-pressure discharge line penetrating horizontal steel cover plate.	Potential debris bypass of the sump screens and subsequent potential degradation or even loss of ECCS function.	GL-98-04 <sup>9-13</sup>
1993	Vermont Yankee (BWR Mark I)	Safety Analysis	LPCS suction strainers smaller than assumed in NPSH calculations. Existing NPSH calculations invalid.	Potential loss of NPSH margin on LPCS during accident conditions.	GL-98-04 <sup>9-13</sup>
1994	South Texas Units 1 and 2 (PWR Dry)	Inspection	Sump-screen openings from initial construction discovered.	Potential debris bypass of the sump screens and subsequent potential degradation of ECCS function.	GL-98-04 <sup>9-13</sup>
1996	Watts Bar Unit 1 (PWR Ice)	Inspection	Containment sump trash-screen door found open with plant in Mode 4 and ECCS required to be operable.	Potential impairment of sump screen function.	GL-98-04 <sup>9-13</sup>
1996	Millstone Unit 2 (PWR Dry)	Inspection	Containment sump screens incorrectly constructed.	Debris larger than analyzed could pass through screens.	GL-98-04 <sup>9-13</sup>

cover plate. The discharge line was an 8-in. (20.3-cm) diameter pipe, and the gap was approximately 6 in. (15.2 cm) wide, resulting in an area of approximately 1.8 ft<sup>2</sup> (0.18 m<sup>2</sup>) that would not filter debris. This gap represented a potential failure to adequately filter the ECCS water source, which that could result in degradation and eventual loss of ECCS function as a result of damaged pumps or clogged flow pathways.<sup>9-13</sup>

#### Vermont Yankee

In 1993, the LPCS suction strainers were found to be smaller than was assumed for the NPSH calculations, rendering those calculations invalid.<sup>9-13</sup> These NPSH calculations were performed in 1986 following an insulation changeout. The strainers were replaced with larger strainers.

#### South Texas Units 1 and 2

In 1994, sump-screen openings from initial construction were discovered.<sup>9-13</sup> A frame plate was warped at the floor, creating several openings approximately 1.6 cm (5/8 in.) wide. Additional gaps 0.6 cm (1/4 in.) wide were found.

#### Watts Bar Unit 1

In 1996, the operator observed that the containment sump screen door was open during Mode 4 operation when the ECCS was required to be operable.<sup>9-13</sup>

#### Millstone Unit 2

In 1996, it was discovered that the containment sump screens were constructed incorrectly and that debris larger than the size assumed in previous analyses could pass through the ECCS.<sup>9-13</sup>

## 9.6 References

- 9-1 NEA/CSNI/R (95) 11, "Knowledge Base for Emergency Core Cooling System Recirculation Reliability," Prepared by U.S. Nuclear Regulatory Commission for the Principal Working Group 1 (PWG-1), International Task Group, Committee on the Safety of Nuclear Installations, Organization for Economic Cooperation and development (OECD) Nuclear Energy Agency (NEA), February 1996.
- 9-2 IN-92-71, "Partial Blockage of Suppression Pool Strainers at a Foreign BWR," NRC Information Notice, September 30, 1992.
- 9-3 Bulletin 93-02, Supplement 1, "Debris Plugging of Emergency Core Cooling Suction Strainers," NRC Bulletin to Licensees, February 18, 1994.
- 9-4 IN-93-34, "Potential for Loss of Emergency Cooling Function Due to a Combination of Operational and Post-LOCA Debris in Containment," NRC Information Notice, April 26, 1993.
- 9-5 IN-89-77, "Debris in Containment Emergency Sumps and Incorrect Screen Configurations," NRC Information Notice, November 21, 1989.
- 9-6 IN-92-85, "Potential Failures of Emergency Core Cooling Systems Caused by Foreign Material Blockage," NRC Information Notice, December 23, 1992.
- 9-7 Bulletin 93-02, "Debris Plugging of Emergency Core Cooling Suction Strainers," NRC Bulletin to Licensees, May 11, 1993.
- 9-8 IN-95-06, "Potential Blockage of Safety-Related Strainers by Material Brought inside Containment," NRC Information Notice, January 25, 1995.
- 9-9 IN-94-57, "Debris in Containment and the Residual Heat Removal System," NRC Information Notice, August 12, 1994.
- 9-10 IN-95-47, "Unexpected Opening of a Safety/Relief Valve and Complications Involving Suppression Pool Cooling Strainer Blockage," NRC Information Notice, Revision 1, November 30, 1995.
- 9-11 NRCB 95-02, "Unexpected Clogging of a Residual Heat Removal (RHR) Pump Strainer While Operating in Suppression Pool Cooling Mode," NRC Bulletin to BWR Licensees, October 17, 1995.
- 9-12 IN-93-34, Supplement 1, "Potential for Loss of Emergency Cooling Function Due to a Combination of Operational and Post-LOCA Debris in Containment," NRC Information Notice, May 6, 1993.
- 9-13 GL-98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After Loss-of-Coolant Accident Because of Construction and Protective Coating

Deficiencies and Foreign Material in Containment," NRC Generic Letter to All Holders of Operating Licenses for Nuclear Power Plants, July 14, 1998.

- 9-14 IN-96-10, "Potential Blockage by Debris of Safety System Piping Which is not Used During Normal Operation or Tested During Surveillances," NRC Information Notice, February 13, 1996.
- 9-15 IN-96-59, "Potential Degradation of Post Loss-of-Coolant Recirculation Capability as a Result of Debris," NRC Information Notice, October 30, 1996.

9-16 IN-97-13, "Deficient Conditions Associated with Protective Coatings at Nuclear Power Plants," NRC Information Notice, March 24, 1997.

9-17 IN-88-28, "Potential for Loss of Post-LOCA Recirculation Capability Due to Insulation Debris Blockage," NRC Information Notice, May 19, 1988.

9-18 IN-89-77, Supplement 1, "Debris in Containment Emergency Sumps and Incorrect Screen," NRC Information Notice, December 3, 1993.

## 10.0 SUMMARY AND CONCLUSIONS

### 10.1 Summary of Knowledge Base

In the event of a LOCA within the containment of a LWR, piping thermal insulation and other materials in the vicinity of the break will be dislodged by the pipe break and ensuing steam/water-jet impingement. A fraction of this fragmented and dislodged insulation and other materials, such as paint chips, paint particulates, and concrete dust, will be transported to the containment floor by the steam/water flows induced by the break and the containment sprays. Some of this debris eventually will be transported to and accumulated on the recirculation pump suction sump screens in PWR containments or the pump suction strainers in BWR containments. Debris accumulation on the sump screens or strainers could challenge the plant's capability to provide adequate, long-term cooling water to the ECCS and the CSS pumps.

This report describes the different analytical and experimental approaches that have been used to assess the aspects of sump and strainer blockage and identify the strengths, limitations, important parameters and plant features, and appropriateness of the different approaches. The report also discusses significant U.S. NRC regulatory actions regarding resolution of the issue. The report is designed to serve as a reference for plant-specific analyses with regard to whether the sump or strainer would perform its function without preventing the operation of the ECCS pumps.

This report is intended primarily for analyzing the PWR sump-screen clogging issue because the BWR issue had been resolved at the time this report was written. Nevertheless, the report also will be valuable in the review of any additional analyses for BWR plants, as well. A majority of the strainer-blockage research to date was conducted specifically for the resolution of the BWR issue; however, most of this research is also directly applicable to the resolution of the PWR issue. Therefore, both BWR and PWR research and analytical approaches are discussed and the applicability of that research, i.e., PWR vs BWR, is stated.

Section 1 of this report provides background information regarding the PWR containment-sump and the BWR suction-strainer debris-clogging issues. This background information includes a brief historical overview of the resolution of the BWR issue with a lead-in to the PWR issue, a description of the safety concern relative to PWRs, the criteria for evaluating sump failure, descriptions of postulated accidents, descriptions of the relevant plant features that influence accident progression, and a discussion of the regulatory considerations.

The purpose of the sump screen, and the associated trash rack, is to prevent debris that may damage or clog components downstream of the sump from entering the ECCS and RCS. Actual sump designs vary significantly among PWR containments, but all share similar geometric features. Sump screens can be grouped according to their submergence, i.e., many sump screens would be submerged completely in the containment sump pool when the ECCS switched over to recirculation, but others would be submerged only partially. Debris accumulation on a completely submerged sump screen would create a pressure drop across that screen that potentially could cause a loss of NPSH margin. Debris accumulation on a partially submerged sump screen would also create a pressure drop across the submerged portion of the screen, but this pressure drop would cause the downstream water level to drop below the upstream water level. If the pressure drop were severe enough, the flow to the pump would be insufficient to supply the pump. The maximum hydrostatic head across a partially submerged sump screen would be approximately half the height of the sump pool. Debris accumulation potentially could block the flow of water to the sump screen at locations other than the screen itself, such as at narrow flow pathways or floor drains from the upper levels or the refueling pool drains. Such blockage could lower the water level in the sump pool, thereby decreasing the hydrostatic head upstream of the screen. All such considerations are plant-specific.

The knowledge base report is organized in the same order that an evaluation of the potential of sump screen blockage would be performed. These steps are as follows.

- The identification of sources of potential debris (Section 2).
- The potential generation of insulation debris by the effluences from a postulated LOCA (Section 3).
- The potential transport of the LOCA-generated debris to the containment sump pool (Section 4).
- The potential transport of debris within the sump pool to the recirculation sump screen (Section 5).
- The potential accumulation of the debris on the sump screen, specifically, the uniformity and composition of the bed of debris (Section 6).
- The potential head loss associated with the accumulated debris (Section 7).

The knowledge base report also summarizes the resolution options that were available to the BWR plant licensees to resolve the BWR suction-strainer-clogging issue (Section 8). This section also discusses the advanced features of the new replacement strainers that were implemented into the BWR plants so that the strainers can accumulate the potential debris loading without the associated debris-bed head loss becoming excessive. This new technology is available for the resolution of the PWR sump-screen clogging issue as well.

A number of events have occurred at plants, both in the U.S. and abroad, that are relevant to the PWR sump-screen clogging issue (Section 9). Two events occurred in which insulation debris was generated as a result of a LOCA. A number of events have occurred in which debris rendered a system inoperable, debris was found in the containment, inadequate maintenance could have led to potential sources of debris, and inadequacies in a sump screen were discovered.

Key aspects of these knowledge base subjects are discussed in the following paragraphs.

#### Debris Sources

Sources of debris that could contribute to the potential clogging of a strainer or sump screen include LOCA-generated debris, exposure-generated debris, and operational debris. All of these sources of debris should be considered. The break effluent following a LOCA could generate substantial quantities of debris within

the containment, mostly in the vicinity of the break. The majority of the destruction to materials near the break would occur within the region usually designated as the zone of influence (ZOI). The size of the ZOI, which usually is considered spherical but could be conical, depends on the type of material, i.e., the region of destruction extends further out for some materials than for others. However, some debris could be generated well beyond the ZOI. As the containment pressurizes, equipment covers, loose coatings, etc., could be blown free to become debris, but the debris generated within the ZOI would likely be the largest source of transportable debris. Sources of debris within the ZOI generally include insulation materials and their respective jacketing, fire-barrier materials, surface coatings, and the erosion of concrete. The dominant source of debris within the ZOI would be destroyed or damaged insulation. There are several types of insulation materials, as well as manufacturers of insulation, and each has unique destruction and transport characteristics. The types of insulation include fibrous insulations, RMI, particulate insulations, and foam insulations.

When the primary system depressurization completes, the materials inside the containment would be subject to high temperatures and humidity resulting from depressurization. In addition, the containment sprays, if activated, would impact and wet surfaces throughout the containment continuously. Prolonged exposure to the LOCA environment, both during depressurization and afterward, could cause some materials to fail, thereby generating additional debris. One concern is that protective coatings within containments would have the potential to detach from the surfaces where they had been applied as a result of prolonged exposure to a LOCA environment. Qualified protective coatings are expected to be capable of adhering to their substrate during a design-basis LOCA (except coatings directly impacted by the break jet), unless those coatings have received extensive irradiation. Coatings, even qualified coatings, that have been subjected to irradiation of  $10^9$  rads, even when they were applied properly, exhibited profound blistering, leading to disbondment of a near-surface coating layer when exposed to the elevated temperatures and moisture conditions within the range of design-basis LOCA conditions. Not all coatings inside the containment are qualified, and therefore, the amount of unqualified

coatings must be controlled because the unqualified coatings are assumed to detach from their substrates during a design-basis LOCA. Besides coating systems, the LOCA environment, especially with the containment sprays operating, could cause failure of the adhesive used to permanently attach tags or labels to walls and equipment. Exposure to the LOCA environment likely would cause oxidation of unpainted metallic surfaces that could generate transportable particulate debris. In addition to generating certain types of debris, exposure to the LOCA environment can degrade previously generated debris further.

Operational debris is debris formed from the operational erosion of containment materials or from materials that normally would not be left inside the containment during operation. Examples of operational debris that has been found inside containments include dirt and dust, rust, cloth and plastic products, tools, and temporary air filters. Good general housekeeping programs are needed to limit such debris.

#### **Debris Generation**

The hydrodynamic forces created during a postulated LOCA in a PWR would damage or destroy surrounding insulation, creating debris that subsequently could transport to the containment sump. Analysis has indicated dynamic (shock) forces and mechanical erosion caused by impingement of the steam/water jet emerging from the broken pipe on neighboring pipe insulation, equipment coatings, and other structures would be the dominant mechanisms for LOCA-generated debris. The blast effects of a shock wave expanding away from an RCS pipe break would cause the initial insulation destruction (unless the break opened slowly enough to preclude the development of a shock wave); however, the strength of the shock wave would decay rapidly as the wave expanded away from the break plane. After the shock wave passes, shear forces and consequential erosion of piping insulation, paint, coatings, and other materials in the wake of the break jet result in additional debris generation.

Unobstructed, the shock wave would expand away from the break in a spherical pattern, and the steam/water jet would expand away from the break plane in the shape of a cone. However, for typical candidate break locations in a typical

PWR containment, the piping congestion, containment structures, and other obstacles would reflect expansion waves and redirect the jet flow, thereby breaking up the jet and possibly dissipating some of its energy. In addition, the broken pipes also could be in motion following the break, and the effluences from the two broken ends could impinge on each other. The resulting expansion of the jet most likely would be rather complex, and as varied as the piping configurations within the plants and the types of break and flow conditions. The pressure distribution within an unobstructed conical jet has been characterized experimentally and analytically with reasonable accuracy but not for a complex obstructed break flow pattern. ANSI/ANS-58.2-1988 describes an analytical method for evaluating the geometry of a freely expanding jet from its initial jet core to the equilibration with ambient conditions, including the intermediate radial isentropic expansion. The generation of debris also would be complex and varied. The generation of insulation debris depends on the location and orientation of the insulation relative to the break, the type of insulation, and whether the insulation is protected by a jacket or installed with banding, as well. For example, an insulation jacket with its seam oriented more toward the jet flow would be much more easily separated than if its seam were oriented on the opposite side of the pipe from the jet.

Analytical methods have been devised to characterize a three-dimensional region of insulation damage, which is referred to as the ZOI. These methods attempt to correlate the energy contained in the steam/water jet to a region in space within which jet pressure would be large enough to cause damage to various types of insulation material. The volume of insulation that would be damaged depends on the size of the ZOI, and the severity of damage to the insulation would decrease as the jet pressure dissipates. Depending on the specific modeling assumptions, the shape of the ZOI could be either conical or spherical.

The minimum (threshold) jet pressure that would cause damage to a particular insulation, referred to as the damage pressure, has been determined experimentally for a number of insulation types and methods of installation. The damage pressure also depends on whether the insulation is jacketed, the type of jacket (and bands), and the orientation of the jacket seams.

The insulation jacket may provide some protection to the insulation, which would be reflected by an increase in the pressure needed to cause damage. The orientation of the jacket seam relative to the jet has been found to profoundly affect the damage pressure in some cases. Another method for expressing the threshold for damage is to correlate the distance from the break to where the jet stagnation pressure drops below the damage pressure. (This distance would actually be a three-dimensional envelope.) The thermodynamic state of the break effluent, i.e., steam, steam/water, or water, has been found to have an important effect on the rate at which jet pressure decays with distance from the break plane and the extent to which the jet expands in the radial direction. The threshold distance (envelope) represents the maximum distance away from the break plane at which an insulation blanket or cassette has been observed in controlled experiments to be damaged, i.e., eroded, fragmented, or dislodged. Inside this distance, the insulation closest to the jet generally would be more damaged, whereas the insulation nearer the edge of the pressure envelope would be less damaged. Beyond this distance, the insulation would remain intact and undamaged. In reality, the damage to insulation within the ZOI could be rather chaotic because the jet would impact insulation at a variety of seam and pipe orientations. Insulation closer to the jet but with its jacket seam opposite the jet might survive, whereas insulation further out was destroyed because its seam was oriented toward the jet. Because the distance to the threshold damage pressure is dependent on the size of the break, the threshold distance frequently is correlated in terms of the diameter of the break, i.e., the distance divided by the break or pipe diameter, expressed as the number of L/D.

Debris generation testing generally has been unobstructed; i.e., the break jet expanded uniformly in two dimensions, axial and radial, without impacting a significant obstacle. The unobstructed geometry provided the means of measuring and/or analytically estimating jet pressures accurately enough to determine the damage pressure for the test specimen. During a series of tests, a test specimen (of the insulation type being tested) would be placed at an increasing distance until a test specimen was not damaged, thus bracketing the threshold damage distance. When debris-generation

testing was conducted using two-phase steam/water break-flow jets, the damage pressures were somewhat lower than when the tests were conducted using air jets.

Rather than attempting to model the complex jet deflections and pipe motions, which would be different for each break scenario, the analytical approach generally used to simulate typical obstructed jet expansion is to assume a spherical expansion of the jet from the break location in an attempt to account for the effects of jet deflections and pipe motion. This approach transforms the total energy within the idealized conical jet model into an equivalent sphere surrounding the break location. The volume (break-size- and fluid-dependent) within a particular conical isobar of the idealized jet model is used to determine the radius of the equivalent sphere, where the isobar corresponds to the threshold damage pressure for the insulation of interest. After the radius of the equivalent sphere for a particular break and insulation type is determined, the analysis must determine the quantities of insulation located within this volume (ZOI), which represents the volume of damaged insulation or insulation debris. Computer programs have been developed using the equivalent-sphere method to systematically assess the insulation inside the ZOI for all potential break locations within containment. The systematic analysis provides a spectrum of potential insulation debris volumes by insulation type, which can be used to determine a screen size capable of handling the potential debris load to the recirculation sump screens.

The extent of damage to the ZOI insulation, i.e., the characteristics of the debris, is also very important. This damage would range from debris that consisted of individual fibers, particles, or small metallic shreds to nearly intact insulation blankets still attached to piping. The finer debris would be much more transportable to the recirculation sump screens than the coarser debris. Here, the equivalent sphere volume may be subdivided into a number of discrete intervals (spherical shells) in which the extent of damage for each interval becomes less severe from the center outward. The insulation in the inner interval likely would be nearly completely degraded into finer debris, whereas the outer interval would be only partially damaged. The integration of the damage over the intervals would provide an estimate of the

debris-size distribution that would be used by the transport calculations. These estimates should be based on available debris-generation data. For example, when an LDFG insulation blanket was completely destroyed during NRC-sponsored air-jet debris-transport tests, from 15 to 25% of the original blanket insulation mass was debris in the form of very fine and very transportable fibrous debris. The transport characteristics of debris are extremely dependent on the debris-size distribution, and the transport of each size grouping or type should be analyzed separately.

#### **Debris Transport to Containment Sump Pool**

The transport of insulation debris within the containment from the locations of origin down to the containment sump pool would be first a result of the effluences from a high-energy pipe break that would not only destroy insulation near the break, but also would transport that debris throughout the containment (airborne debris transport). If the break effluences were to pressurize the containment sufficiently to activate the CSS to suppress further pressurization, the transport of insulation debris also would be driven by the drainage of the spray water from the spray heads to the recirculation sump (washdown debris transport). The transport of debris within a PWR would be influenced both by the spectrum of physical processes and phenomena and by the features of a particular containment design. Because of the violent nature of flows following a LOCA, insulation destruction and subsequent debris transport are rather chaotic processes.

Many important debris-transport parameters will be dependent on the postulated accident scenario. Both the LOCA break size and its location influence the debris transport by determining the flow dynamics within the containment, the timing of the accident sequence, the activation of the containment sprays, and the pumping flow rate from the sump. A number of features in nuclear power plant containments, including engineered safety features and associated plant operating procedures, would affect the transport of insulation debris significantly. In PWR containments, break effluences would tend to flow generally up toward the large free volume of the containment dome, carrying debris with the flow and thus generally away from the ECCS sump screens. Entrained debris would be

deposited inertially, in part, on gratings, piping, beams, ice condenser banks (in ice condenser plants), etc. Debris would settle gravitationally from the upper dome atmosphere as flow velocities and turbulence dissipated. If it were not for the containment sprays washing the debris back down toward the recirculation sump, the debris carried aloft likely would remain in the higher reaches of the containment. The complete range of thermal-hydraulic and physical processes affect the transport of insulation debris. The dominant debris-capture mechanism in rapidly moving flow likely would be inertial capture, but in slower flows, the dominant process likely would be gravitational settling.

After the airborne debris is dispersed throughout the containment, the subsequent washdown of that debris to the recirculation sump would be determined primarily by the design of the containment spray system including the drainage of the sprayed water. First, the spray droplets would tend to sweep any remaining airborne debris out of the containment atmosphere. Then the falling droplets would wash substantial portions of the debris off surfaces; structures, equipment, walls, floors, etc. As the drainage water worked its way downward, entrained debris would move along with the flow.

The locations where spray drainage enters the sump pool relative to the location of the recirculation sump are important. Debris transport within the sump pool depends upon a number of plant features, including the lower compartment geometry, that define the shape and depth of the sump pool, such as the open floor area, ledges, structures, and obstacles within the pool. In addition, the relative locations of the sump, LOCA break, and drainage paths from the upper reaches of the compartment to the sump pool are important in determining pool turbulence, which in turn determines whether debris can settle in the pool.

Transport of debris is strongly dependent on the characteristics of the debris formed, and several distinct types of insulation are used in PWR plants. These characteristics include the types of debris (insulation type, coatings, dust, etc.) and the size distribution and form of the debris. Each type of debris has its own set of physical properties, such as density; buoyancy when dry,

partially wet, or fully saturated; and settling velocities in water.

The U.S. NRC, U.S. industry, and international organizations have conducted tests and analyses to examine different aspects of airborne and washdown debris transport within nuclear power plant containments and developed methodologies for performing analyses to estimate the transport of debris. Although much of this information was obtained specifically to support the resolution of the BWR strainer-blockage issue, that information is directly applicable to the PWR sump screen blockage issue, for the most part.

Analytical work has demonstrated clearly that available computer codes do not have the capability to realistically simulate debris transport except for limited transport conditions. Specifically, the aerosol transport models of these codes do not usually have inertial impaction models that can be applied universally to containments. An exception would be the transport of small debris at relatively slow flow velocities, where the debris deposition was primarily a result of gravitational settling. There are computer codes, such as the MELCOR code, that can characterize thermal-hydraulic conditions within the containment. Alternative methods have been devised to estimate airborne and washdown debris by decomposing the problem such that the individual parts of the overall transport problem can be resolved by adapting experimental data tempered with engineering judgment. This approach works best where there are relatively few flow pathways and substantial inertial capture along those pathways by structures such as gratings or by sharp bends in the flow.

#### **Debris Transport in Containment Sump Pool**

Debris transported to the containment sump, by airborne transport (entrained in the break flow) or by containment spray washdown transport, would reside in the water pool that would accumulate in the sump. The transport of debris within a PWR containment sump pool would be influenced by a variety of physical processes and phenomena and by the features of a particular containment design. Many aspects of a PWR accident scenario are important in estimating debris transport in the containment floor sump pool; these include: the break location, orientation, and flow rate, the

containment spray drainage locations and flow rates, the recirculation sump location, flow rate, and the activation time, and the sump pool geometric shape, depth, and temperature. Fundamental to analyzing the potential for debris transport in a containment pool are the types, sizes, and quantities of debris that could be in the pool as well as where and when the debris entered the pool.

The transport of debris within the sump pool would occur in two very different phases. The first pool transport phase would occur as the sump pool forms where debris that was deposited onto the sump floor during and shortly after RCS depressurization before sump-pool formation (and also before ECCS switchover to the recirculation mode) would be transported with the fill-up water flows. During the fill-up phase, debris on the floor would transport as the initially shallow and fast flowing water spreads out across the sump floor. In this mode, debris could be transported a substantial distance from its initial deposition location; the transport could either move debris toward the recirculation sump or away from the recirculation sump. The second pool transport phase generally covers the period after the ECCS has switched over to recirculation where the pool flow conditions are at or near quasi-steady state.

The complex movement of water through the sump pool would be unique for each postulated accident sequence and for each plant. The geometry of the sump pool affects the complexity of the water movement and that geometry is plant-specific. Pool turbulence affects whether or not debris can settle and whether it will further disintegrate. Pool turbulence depends upon the entrance of water into the pool; here the plummeting of break overflow water would be the primary source of turbulence. The turbulence therefore depends upon the location, orientation, and elevation of the break, and on the surrounding congestion of piping and equipment below the break. It is known that pool turbulence can affect the further disintegration of certain types of debris; disintegration due to turbulence has been observed for LDFG and calcium silicate debris. This type of disintegration, essentially an erosion process, forms very fine debris that remains suspended in the water even at relatively low levels of turbulence, hence virtually complete transport to the sump screens.

Water from containment spray drainage would enter the sump pool at multiple locations and the drainage pattern would be very plant specific. The locations of the incoming water relative to the location of the recirculation sump would be especially important. The relative locations determine the flow patterns, which in turn determine whether or not or how many significant quiescent regions would exist in the pool. Debris within these quiescent regions could well remain in those regions. If the incoming water entered the sump pool well away from the recirculation sump inlet, then the water flow could sweep a majority of the pool, thereby enhancing debris transport. Conversely, the incoming water could be near the recirculation inlet, so that much of the sump pool was relatively quiescent. The depth of the pool strongly affects debris transport primarily because the depth affects flow velocities and turbulence. The temperature of the water affects the water density and viscosity, the rate at which water penetrates dry insulation debris, and could affect debris disintegration rates.

Geometric features such as compartmentalization, free flowing annuli, flow restrictions, and obstacles all affect the patterns of flow. There would be areas of relative high flow velocity and areas of relatively slow or quiescent flow velocities. Debris would readily transport in the high velocity areas but not in the low velocity areas. Further, the shape of the sump pool would contribute to the creation of rotational flows (vortices) where debris can be trapped within the vortex. The flow would accelerate through narrow pathways, such as an entrance into an interior compartment, and then decelerate beyond the entrance as the flow expands. Debris that did not transport to the sump screen would have been effectively trapped within a quiescent region, such as an inner compartment that does not receive significant flow; effectively trapped inside a vortex; or stopped behind an obstacle. Obstacles to debris transport on the floor of the sump pool include the variety of equipment located there and curbs deliberately placed along the floor in front of the sump screen to retard the transport of debris to the sump screen. These obstacles could stop tumbling debris from reaching the screen unless the local flow velocities were sufficient to lift the piece of debris over or around the obstacle.

The analysis of debris transport test results has identified many processes and phenomena that could significantly affect the transport of debris within the sump pool. The processes include both the bulk flow processes and the localized processes such as pulses of turbulence. Local flow turbulence can cause a piece of debris to move whereas the bulk flow velocity might not be sufficient for that movement. Testing has effectively demonstrated that turbulence can keep debris suspended in the pool, enhance the transport of debris along the floor of the pool, and cause additional disintegration of the debris.

Once the pool becomes sufficiently established to suspend debris, that suspended debris would simply move along with the water flow. Fine debris, such as individual fibers or light particles (e.g. calcium silicate), would essentially remain suspended even at relatively low levels of pool turbulence. Ultimately, most of this fine suspended debris would likely be filtered from the pool by the recirculation sump screens. Larger debris could be suspended in the more turbulent regions of the sump pool or before the debris was completely saturated with water. Debris not completely water saturated would contain some air that could give the debris buoyancy. Truly buoyant debris, such as some of the form insulations, would float on the pool surface unless the pool turbulence was sufficient to pull the debris beneath the surface. When insulation debris enters the sump pool, the debris could be dry, or fully or partially saturated with water depending upon its exposure to moisture. If the debris was not fully saturated, then the trapped air could make the debris buoyant, whereas it would readily sink when fully saturated. The time required for water to saturate a piece of debris is very dependent on the temperature of the water.

Non-buoyant debris, such as saturated fibrous debris, would settle to floor of the pool, except in regions of high turbulence. If the local flow velocities were sufficiently high, sunken debris would transport along the floor with the water flow. This transport involves tumbling and sliding motions. The separate effects test data provides the flow velocities needed to start debris in motion, referred to as incipient motion, and the flow velocities needed to cause the debris to transport in bulk motion. Note that significant turbulence would cause debris to transport along the floor at lower bulk flow velocities than if there was no turbulence.

Debris moving across the sump pool floor could encounter an obstacle that stops further forward motion. Debris trapped against one of these obstacles could be lifted over the obstacle when the flow velocities were sufficiently fast. The separate effects test data also provides these lift velocities.

The NRC, U.S. industry, and international organizations have conducted both tests and analyses to examine different aspects regarding the transport of insulation and other debris in pooled water. The results of these experiments provide qualitative insights and quantitative information relevant to considerations of debris transport in PWR containment pools. The NRC has performed analyses investigating the transport of insulation and other debris in PWR containment sump pools and BWR drywell floor pools and BWR suppression pools. The results of these analyses provide qualitative insights and quantitative information relevant to considerations of debris transport in PWR containment pools.

Two approaches to modeling the transport of debris in a containment pool are found in the literature. One is experimental in nature; the other is computational. The experimental approach to modeling debris transport in a particular containment sump pool involves building a scaled representation of the floor of the containment complete with all the walls, curbs, equipment, etc., that would determine the flow patterns in the pool. Defensible similitude between the physical containment and the model must exist here, however a defensible similitude will be difficult to develop. The rationale for scaling the water flow differs substantially from the scaling rationale for scaling debris transport, but both processes must be scaled simultaneously. Appropriate inertial force scaling, governing water flow, requires that flow velocities be reduced with the square root of the length scale. Appropriate viscous force scaling, governing debris transport, requires that flow velocities be increased proportional to the length scale. It may be that water flow and debris transport characteristics cannot be simultaneously satisfied in a scaled experiment. While illustrative experiments of containment pool modeling are documented, no defensible scale modeling of debris transport potential in a specific containment has been accomplished to date. Critical testing considerations include

recirculation flow rate, debris size, the height of the pipe break above the floor, the preparation of the debris (size distribution and pretreatment to remove trapped air), and introduction of the debris into the test. The potential for debris disintegration within the pool must be investigated.

The computational approach to modeling debris transport in a containment pool involves performing CFD calculations. While commercially available CFD codes are clearly suited to predicting the flow patterns and velocity fields that would exist in a containment pool, the codes lack the ability to directly predict the transport of the various types of insulation and other debris that could be present there. This is because CFD codes do not have the capacity to resolve or account for the intricate transport characteristics of the different types, shapes, and sizes of potential debris. As such, the flow field predictions from a CFD containment pool calculation (e.g., velocities and turbulence levels) have to be compared with experimentally determined debris transport characteristics to infer whether or not transport would occur. Illustrative CFD calculations of containment pool debris transport have been documented, but as with experimental containment pool modeling, no defensible complete CFD analysis of debris transport potential in a specific containment has been accomplished to date.

#### **Debris Accumulation**

LOCA-generated debris will have an adverse effect on recirculation sump performance if it accumulates in sufficient quantity and in a configuration that impedes flow. Although the principal location of concern for debris accumulation is the surface of a recirculation sump screen, debris accumulation also can apply to other locations in the containment; such as a critical location for the flow of recirculation water along the containment floor where an accumulation of debris could impede water flow to the sump, or screens in the upper containment levels at floor or refueling pool drains. The physical configuration of the sump screen, as well as its position and orientation in the pool of water it services, vary considerably among the U.S. PWRs. Recirculation sump screens can be classified as either fully submerged or partially submerged, and as horizontal, vertical, or sloped. For fully submerged screens, excessive accumulation of

debris can cause the head loss across the debris bed to reduce available NPSH to ECCS or CSS pumps. For partially submerged screens, excessive debris accumulation can reduce the static head necessary to drive recirculation flow through the screen.

The geometric configuration of a debris bed formed at a location of concern strongly influences the extent to which it affects flow. The geometric configuration includes such features of the bed as the fraction of sump screen area covered by debris, the uniformity of the bed covering the screen, the height of the debris bed off the floor (for vertical screens), and the bed composition (i.e., porosity). Variations in these features result in different accumulation patterns or debris bed profiles, which in turn affect resistance to water flow. The manner in which LOCA-generated debris accumulates is influenced by plant-specific and accident-specific parameters, including those that determine the characteristics of the local flow field, i.e., level of turbulence and flow velocity. Turbulence facilitates debris mixing into the flow stream, and thereby promotes uniformity in the deposition. At low turbulence levels, gravitational settling leads to non-uniform accumulation profiles on vertical screens. At higher velocities, shear forces on debris can lift or flip debris upward onto higher regions of the screen. The following experimentally observed qualitative insights apply to simulated PWR screens. When fine debris (e.g., individual fibers, smaller clumps of fibers, and calcium silicate particles) arrives at the screen in a well-mixed suspension, it deposits nearly uniformly across the screen. Small debris (e.g., clumps of fibrous or calcium silicate debris or crumpled RMI debris) that arrives at a PWR screen by tumbling or rolling across the pool floor may form a pile of debris at the bottom of a vertical screen, or if the flow velocities are sufficient, the debris may be lifted above the already deposited debris to spread across the screen. At the other extreme, non-buoyant large or heavy pieces of debris (e.g., insulation pillows, blankets, or cassettes or large portions thereof) will collect on a screen only if local water velocities are sufficient to transport the debris across the pool floor and then lift or flip it onto the screen surface. The accumulation behavior of the moderate sized (in-between the small and the large) pieces of debris (e.g., an irregular shaped piece of fibrous insulation a few inches to a side) represents a mixture of smaller and larger debris

behavior. Qualitatively, the debris capture efficiency of a screen is not strongly dependent on the size of the screen mesh for the meshes tested (i.e., 1/8 to 1/4 mesh), which are typical of screens found in U.S. PWRs. (A few exceptions have larger mesh sizes.)

Experiments have provided valuable qualitative insights on debris accumulation on BWR suction strainers and these insights are also applicable to PWR sump screens. To resolve the BWR suction strainer issue, tests were conducted on both the original cone shaped strainers and the replacement strainer designs where the most common BWR replacement strainer design is the so-called stacked-disk strainer. The cone strainers effectively accumulated debris in a manner similar to a flat plate strainer (unless the accumulation is excessive). The process of debris accumulation on a stacked disk strainer is more complicated than for a flat screen but the stacked disk process increased the debris accumulation capability of the strainer. With water flow following the path of least resistance, debris is deposited onto all of the screened surfaces of a stacked disk strainer but the flow and deposition is skewed towards the screened surfaces of lesser resistance. As debris accumulates onto the disk-shaped surfaces inside the gaps, the flow moving somewhat parallel to these surfaces pushes the debris on these surfaces further into the gaps, essentially keeping a portion of the disk surface relatively clean of debris until the gaps are filled. After the gaps filled, the debris preferentially occurs on the disk rims until the accumulation becomes circumferentially more uniform. The BWR stacked disk strainer technology potentially could be applied to possible PWR screen replacements.

Qualitative observations made during debris transport and screen accumulation tests have illustrated that a significant reduction in flow might allow debris to expand, fall off or shift on the screen, thereby changing the accumulation profile. If flow is subsequently restored, the debris bed re-forms, however the bed configuration may be substantially different from those formed before the reduction in flow.

#### **Debris Head Loss**

The accumulation of debris onto a PWR sump screen or a BWR suction strainer would cause a head loss that could compromise long-term

recirculation ECCS and CSS. Head loss across the debris bed depends on the debris bed composition, i.e., its constituents and its morphology. The spectrum of possible debris bed compositions is as varied as the types of insulation and other materials in the containment and as varied as the conditions of the accident scenario. The debris bed compositions can be broadly divided into the following groups: (a) fibrous debris beds, (b) mixed fibrous and particulate debris beds, (c) beds formed by fragments of reflective metallic insulation, and (d) mixed RMI and fibrous debris beds. Note that beds can also contain miscellaneous other materials, such as shreds of insulation jacketing or miscellaneous operation debris.

The fibrous shreds filtered from the water flow by the screens tend to overlay the mesh holes of the screen and as the accumulation builds, the flow through the resulting fibrous bed resembles flow through a porous media. Note that a smaller quantity of individual fibers can slip through the holes of the screen. Head loss is caused as water accelerates past the cylindrical fibers oriented somewhat normal to the screen surface. Then the resulting pressure drop across the bed compresses the bed leading to progressively higher head losses.

Experimental head loss data obtained for fibrous beds has been adequately explained using conventional porous media head loss correlations. Head loss across a debris bed increases linearly with velocity in the viscous region and to the square of the velocity in the turbulent region; a combination of these two terms can explain the transition between the viscous and the turbulent flows. A correlation developed by the NRC, referred to as the NUREG/CR-6224 correlation, has performed well in predicting the head losses associated with fiber debris beds. Head loss across the strainer is dependent on the thickness of the fiber bed (i.e., the volume of fiber debris divided by the screen area for a uniform bed) trapped on the strainer surface, the uniformity of the bed, and the diameters of the fibers, the density of the fibers, and the water temperature (i.e., water density and viscosity). The pressure drop across a non-uniform bed would be lower than that predicted by assuming uniformity. Non-uniformity can happen when debris is deposited in larger shreds and most likely happens when the bed starts to form. As the formation continues, the bed tends towards more

uniformity. Very fine debris tends to form very uniform debris beds. Higher water temperatures result in lower pressure drops primarily due to the corresponding decrease in the water viscosity. One concern still not completely understood is whether or not the effects of water chemistry (pH) could alter the bed composition and thereby affect the head loss. Some investigators concluded that pH could dissolve some of the chemical coatings/binders applied on the fibers leading to their degradation and formation of even more compact beds, however most testing was not conducted for a long enough time for the water chemistry effect to be tested.

Fibrous debris accumulation on a screen will filter particulate from the passing flow forming a debris bed consisting of a mixture of fibers and particulate that is substantially more compact resulting in much higher head losses than fiber alone. The filtered particulate could include corrosion products, paint chips, organic sludge, concrete dust and fragments of non-fibrous insulation (e.g., calcium silicate). This behavior has been experimentally verified and measured for some potential bed compositions. Debris beds consisting of relatively thin layers of fibrous debris (as thin as 1/8-in. or possibly less) and substantial quantities of particulate lead to relatively high head losses. This effect, referred to the thin-bed effect, has been experimentally verified. The morphology of a thin bed closely resembles granular beds, rather than fibrous beds. Debris beds formed with calcium silicate, or other particulate insulations, have a substantially higher associated head loss than if the particulate were simple dust or dirt. The calcium silicate morphology is not completely understood and its effect is still being investigated experimentally but its effect on head loss may be due to small fibers and binder in the insulation with the particulate.

In plants that have nearly all RMI insulation, either stainless steel or aluminum RMI, the debris bed could consist almost entirely of fragments of RMI insulation debris. The head loss associated with these RMI fragments would be highly sensitive to type, shape and size of the accumulated fragments. The fragments could range from relatively intact cassettes to sheets of foil to crumpled pieces or shreds of foil (both large and small). If the water approach velocity were fast enough to transport large foils (or even cassettes) to the sump screen and then flip the

foils onto the screen, the foils would partially block the screen essentially by reducing the screen area available to flow. Experiments using simulated crumpled debris demonstrated that RMI fragments, typically, form loose beds that induce low head losses. These crumpled debris beds tended to be relatively uniform and typically have a much larger porosity than the fibrous debris beds. Compactness and porosity depend upon the general size of the RMI fragments, i.e., the smaller fragments beds are more compact, less porous, and result in higher head losses. Aluminum RMI debris tended to form more compact beds than the stainless steel debris. The extent of crumpling exhibited by RMI fragments apparently depends upon the orientation of the steam/water jet impacting the RMI cassette; hence some flat-not-crumpled pieces of foil, as well as, crumpled pieces. In addition, it has been postulated that crumpled foils could be compressed during transport, effectively transforming the debris into flattened debris that could increase the resulting head losses.

Mixed fiber and RMI debris beds have been studied by various U.S. and European investigators for head loss implication both with and without the presence of particulate debris. The head loss data shows a wide scatter in results. In most cases, the RMI head loss tests demonstrated that introduction of crumpled RMI debris, in combination with fibrous debris and sludge, does not cause significantly different head losses than those observed with only fiber and sludge loadings. In fact, the most significant finding of NRC tests was that under certain circumstances when RMI debris was mixed with fibrous debris and sludge, the head losses appeared to decrease as compared to similar conditions without RMI debris. However, in a few cases, the head loss caused by RMI and fibrous debris mixtures was slightly higher than the head losses at the same fiber loading but without RMI. It was concluded that generally the head loss caused by RMI debris, in conjunction with fibrous (and other) debris, would be bounded by adding the head loss caused by the individual constituents of the debris bed, (e.g., the RMI head loss without fibers plus the fiber/particulate head loss without RMI). However, the European investigators observed that its validity needs to be established for each application.

Analytical methods have been developed to estimate the head loss associated with a variety of debris beds. For fibrous/particulate debris beds, the NUREG/CR-6224 correlation that was developed by the NRC based on experimental data, for flat-plate strainers and truncated cone strainers, has been successfully validated against a variety of experimental data and for a variety, but not all, debris bed compositions. Appendix B of the NUREG/CR-6224 report characterizes the head loss caused by fibrous and particulate debris in detail including the assumptions and limitations of the correlation. The correlation predictions were generally within  $\pm 25\%$  of the test data. (Note that there is substantial data variability between the arrays of test data attributable to debris bed formation, test procedures, etc, even data for flat-plate strainer experiments.) The NUREG/CR-6224 head loss correlation was incorporated into the NRC-developed BLOCKAGE computer code that evaluates the head loss associated with BWR suction strainers.

The NUREG/CR-6224 head loss correlation has been applied piecemeal to the non-uniform debris buildup associated with the special-shape strainers (e.g., stacked disk strainers), where the head loss has a non-linear relationship with the debris loading; the correlation was applied to the light initial debris loading and the heavier circumferential debris loading that were approximately uniform, by assuming a different effective screen area for the two conditions. Applicable test data was important to proper evaluation of the capability of these strainer designs. While the BLOCKAGE code was developed for the truncated cone strainers in use at that time, the code could be modified to accommodate the advanced strainers.

A correlation was developed for reflective metallic insulation based on debris loading (ratio of foil surface area-to-strainer surface area), the flow velocity, and the type/size of the debris. This correlation was also verified using experimental data.

### Resolution Options

BWR experience demonstrated that the options for resolving the strainer clogging issue were to replace problematic insulations in the containment, or install replacement strainers capable of handling the anticipated debris loads (or both). The replacement strainer options

included: (1) the installation of large capacity passive strainers; (2) the installation of self-cleaning strainers; (3) the installation of backflush systems; and (4) the installation of in-line suction strainers outside suppression pool that can be realigned and flushed. Licensees of U.S. BWR plants chose to replace their strainers with large capacity passive strainers due to the advantages of these strainers not having active components and not requiring operator intervention.

A number of replacement strainers were designed, tested, and installed in U.S. BWR plants. The primary design concept in all passive strainers was to maximize the strainer surface area while minimizing physical size of the strainer. Four types of passive strainer designs were ultimately installed at one or more U.S. BWRs. There were (1) the PCI stacked disk strainers, (2) the General Electric stacked disk strainers, (3) the ABB Combustion Engineering star shaped strainers, and (4) the Mark III strainer designs. But the most prominent strainer designs were of the stacked disk design. Although these designs differ significantly from each other, the designs had one common feature in that the designs all relied on crevices (troughs, or traps) where debris can collect on the strainer surface while keeping a portion of the screen area relatively free of debris, thereby not significantly increasing the head loss across the strainers. Each of these design concepts was further refined or reengineered as required to suit a particular plant need and each design was tested to determine its capability to collect debris. The constraints related to hydrodynamics loads were factored into the plant-specific designs. In some cases, these loads limited the size of the strainer, thereby requiring the plant to take additional actions, such as the replacement of problematic insulation to help facilitate the solution.

The experimental results demonstrated that head loss across the advanced passive strainers modules is a non-linear function of debris loading. As debris accumulates on one of these strainers, the debris is preferentially forced into the gaps or crevices, thereby leaving some screen area relatively free of debris, until the gaps become filled. After the gaps filled, the debris preferentially occurs on the disk rims until the accumulation becomes circumferentially

(cylindrically shaped in the case of stacked disk strainer) more uniform.

Special sump screen designs for implementation in the PWR plants have yet to emerge in the U.S. However, the BWR advanced strainer design technology should be applicable to the design of PWR screen replacements, as well. The basic concepts of enlarging the screen area and incorporating debris traps (e.g., the stacked disk strainers) are as applicable to PWR sump screens as the concepts were to BWR pump suction strainers. It is conceivable that a BWR stacked disk suction strainer could be simply installed in a PWR sump in some situations.

The design of replacement sump screens should also consider the water approach pathways to the recirculation sumps, the screen mesh size, and protection from damage due to LOCA jet impingement and missile impaction. Debris blockages along the water approach pathways could reduce the availability of the water to the sump screen, resulting in a lowering in the water level at the screen. The type and size of debris passing through the sump screen is determined by the size of the screen mesh, particularly in the early stages of the accident before a bed of debris forms. Debris passing through the screen has the potential to clog or damage components throughout the ECCS and/or CCS systems (e.g., a spray nozzle). The impingement of a LOCA jet onto finer mesh screens or the impact of fragments of hard insulation (e.g., RMI) could cause substantial damage potentially threatening the integrity of the screen.

#### Event History

Operational events have occurred at both PWR and BWR nuclear power plants that relate to the issue of sump screen or suction strainer blockage. Two of these events resulted in the generation of insulation debris by jet flow from a LOCA caused by the unintentional opening of safety relief valves (SRVs). These occurred at:

1. the German reactor Gundremmingen-1 (KRB-1) in 1977 where the 14 safety relief valves of the primary circuit opened during a transient and
2. the Barsebäck-2 nuclear power plant on July 28, 1992 during a reactor restart procedure after the annual refueling outage.

Both of these reactors were BWR reactors with similarities to U.S. reactors. Perhaps the most notable event was the Barsebäck-2 LOCA where the reactor power was below 2% of nominal and the reactor pressure had reached 3.0 MPa (435 psia) when a safety relief valve inadvertently opened. The steam was released as a jet of steam directly into the containment. Subsequently, the containment pressure cleared the vertical pressure relief pipes connecting the drywell to the wetwell allowing steam/air flow to the suppression pool and the containment vessel spraying system and the ECCS were automatically started. About 200 kg (440 lb) of fibrous insulation debris was generated and about 50% of this debris subsequently reached the wetwell resulting in a large pressure loss at the strainers about 70 min after the beginning of the event. The debris was transported by steam and airflow generated by the blowdown, and by water from the containment spray system. The extent of damage and the transport of large amounts of fibrous debris due to the simple erroneous opening of a safety valve appeared remarkably large, given the small leak size and low reactor pressure.

Other events have occurred in operating PWR and BWR nuclear power plants that resulted in a particular system being rendered inoperable or at high risk of not operating. These included events where the accumulation of debris on a strainer or a screen caused excessive head loss and events where debris entered a system and thereby adversely affected the operability of a component of that system. Perhaps the most notable of these events were the two ECCS strainer-clogging events that occurred at the BWR Perry plant. Debris was found during a refueling outage inspection and again later when several safety relief valves were manually lifted and the RHR system was used to cool the suppression pool. These events involved the clogging and deformation of the pump suction strainers due to glass fibers from temporary drywell cooling filters inadvertently dropped into the suppression pool, corrosion products (sludge), fine dirt, and other materials. Fibrous material acted as a filter for suspended particles, a phenomenon not previously recognized, strongly suggesting that the filtering of small particles by the fibrous debris would result in significantly increased pressure drop across the strainers.

Events have occurred in operating PWR and BWR nuclear power plants where debris was found inside the containment and that debris had the potential to impair the operability of a safety system. The debris included fibrous material, sludge, dirt, paint chips, and miscellaneous operational materials. Even if the debris was not considered sufficient to render a system inoperable, the debris could still contribute to screen blockage following a LOCA. Events have occurred where inadequate maintenance conditions inside containments had the potential of forming sources of debris. In general, these events involved unqualified protective coatings and materials. Events have occurred where defects in the integrity of the sump screens were found. These defects could have caused a potential failure to adequately filter the ECCS water source that could result in degradation and eventual loss of ECCS function as a result of damaged pumps or clogged flow pathways.

## 10.2 Conclusions

As a result of years researching the BWR suction strainer and PWR sump screen clogging issues, a substantial base of knowledge has been amassed that covers all aspects of the issues, from the generation of debris to the head loss associated with a debris bed on a strainer or screen. A majority of the research (testing and analysis) was done to support the suction strainer clogging issue for BWR plants; however, most of this research is directly applicable to PWRs, as well. The spectrum of physical processes and phenomena that affect debris generation, transport, and strainer/screen head loss are the same for PWR sump screens as for BWR suction strainers.

Although the physical processes and phenomena associated with the resolution of the sump screen clogging issue are generally the same for all PWR plants, the actual resolution will be very specific to each plant. With few exceptions, each plant has unique distributions of insulation (types and locations) and other potential debris materials, unique geometric features affecting debris generation and transport, unique recirculation sump designs, and unique flow and NPSH requirements. This is true even among plants of similar containment design. The exceptions might be multiple units of essentially the same plant, e.g., the three units at Palo Verde, but even here the actual

make up of insulation within each of the plants may have evolved separately from the others. Only plant-specific analyses can determine such aspects of the resolution.

While the base of knowledge covers the breadth of the PWR sump screen clogging issue, gaps exist in the completeness of the knowledge base. For example, the research tended to focus on fibrous insulation debris, specifically low-density fiberglass insulation (LDFG) debris. This focus was partially the result of the initial analyses of strainer event blockages that involved LDFG debris but it was also due to the relative importance of fiberglass to the issue. Research has also considered other types of insulation debris but to a lesser extent, notably experimental RMI debris research, but the potential for fibrous insulation debris to clog a strainer has generally been found to be substantially greater for fibrous debris than the potential for RMI debris. Further other types of fibrous debris were not researched as thoroughly as was LDFG, for example, HDFG or mineral wool fibrous debris. These other types of fibrous debris are as important to the resolution of the issue as LDFG but less data was amassed for these types, hence gaps exist in the completeness of debris transport research data but not in the overall understanding. Other examples of database gaps include:

1. full-range size distributions for LOCA generated debris as a function of the jet pressure so that a size distribution can be integrated (less conservatively) over the volume of the ZOI, thereby determining the overall size distribution for the debris generated,<sup>1</sup> and
2. data for the lifting of debris over an obstacle once significant debris has already accumulated upstream of the obstacle, thereby reducing the effectiveness of the obstacle to trap debris.<sup>2</sup>

Even with gaps in the knowledge base, a general understanding has been gained regarding nearly all aspects of the clogging issue. The spectrum of physical processes and phenomena all affect debris generation, debris transport, and strainer/screen head loss, but

<sup>1</sup> As noted in Section 3.3.3, current debris size distribution data is limited.

<sup>2</sup> As noted in Section 5.2.5, current measurements of debris lifting velocities were made using a clean curb.

research has generally determined the processes/phenomena that have the most influence, i.e., which processes/phenomena that definitely must be considered in a plant-specific analysis. Besides experimental data, the knowledge base includes methodologies and analyses that provide guidance that will support plant-specific analyses.

The knowledge base includes key concepts and insights to ensure the important aspects are addressed in the plant-specific analyses. Examples include the role of damage pressures in determining the potential quantities of insulation debris and that two-phase jets appear to generate more and finer debris than does an air jet, the importance of properly defining debris size classifications for transport analyses, (note that size classifications have varied through the years of research), the importance of tracking the finest debris as a separate class, and the importance of estimating the further degradation of debris as it is transported (especially within the sump pool), the importance of accounting for pool turbulence and the establishment of the initial pool flow when estimating pool debris transport, and the composition of the debris bed when estimating head losses across the debris bed, particularly when the bed contains fibers and calcium silicate.

There are a few areas where the basic understanding of a particular process is not fully understood; future research may provide additional data for some processes. For example, it is known that sump pool turbulence will further degrade fibrous debris, creating more of the very fine debris, perhaps substantial quantities, that remains suspended, but no data exist to provide a means of quantifying the degradation. Another example is that it has been postulated that chemical changes within the debris bed could alter the composition in the longer term due to changes in the acidity level in the sump pool. Altering the debris bed composition would alter the associated head loss; if the bed compacted, the head loss could well increase. The plant-specific resolutions may require that additional data be taken for insulation components that were not specifically covered in the current knowledge base, for example, the damage pressure for insulation jacketed or oriented differently than any of the current data. Despite the gaps in the base of knowledge, this knowledge base should provide a valuable resource for the sump screen issue resolution.

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

DPS Exhibit 32  
31 Pages

ADVERSE TREND COMMON CAUSE ANALYSIS REPORT

CR Number: CR-VTY-2004-0918

Category:  A  B

Assigned Department: ENG SYS Code Programs

Investigation Team:

Name	Department	Function
Larry Lukens	Code Programs	Team Leader
Rich Rusin	Component Engineering	Management Sponsor
Mike Annett	System Engineering	Member
Larry Prill	J. A. FitzPatrick	Member
George Short	Training	Mechanical Maintenance Background; MSIV Experience; Training Representative; RCA Qualified
Jim Taylor	Technical Support	Mentor; RCA Qualified

Date Report Completed:

- The CR was caused by or identified an equipment/component failure.  
*(If YES, complete VYAPF 0009.06 (Equipment Failure Evaluation Checklist) in accordance with Appendix M.)*
- The CR involved one or more HU inappropriate acts.  
*(If YES, complete VYAPF 0009.05 (ENVY Human Performance Evaluation Form) in accordance with Appendix H.)*

Problem Statement:

There is an adverse trend in as-found leakage rate results in main steam isolation valves at Vermont Yankee.

Executive Summary:

The as-found LLRT history for MSIVs shows an adverse trend over the past four refueling outages. In RFO-21, there were zero as-found MSIV LLRT failures; in RFO-22 there was one; in RFO-23 there were two; and in RFO-24 there were three.

This investigation looked at the safety implications of this adverse trend to determine whether or not this adverse trend challenges the operability of MSIVs or their ability to perform their intended safety

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

function, which is to close and maintain an essentially leak-tight barrier to the release of containment atmosphere. The results of this investigation are that there are no challenges to the safety or reliability of MSIVs or their ability to perform their safety function. The adverse trend in MSIV LLRT failures is the result of factors unrelated to the ability of MSIVs to perform their safety function.

1. The actuator does not provide sufficient force to ensure a leak-tight seal when tested in the reverse direction.
2. The test method penalizes both the inboard and the outboard valves, resulting in LLRT failures that do not reflect the ability of the valves to perform their safety functions.
3. The current Technical Specification leakage limits for MSIVs are unnecessarily low and result in LLRT failures that do not reflect the ability of the valves to perform their safety functions.
4. Since this combination of factors presents an unrealistically difficult condition for leakage rate testing, maintenance on MSIVs must be raised to an uncommonly high level of precision.

This evaluation concludes that the MSIVs at Vermont Yankee are fully capable of safe, reliable operation. They are operable, and they are capable of fulfilling their containment isolation function. Maintenance and design enhancements were implemented in the five MSIVs that were worked on in RFO-24, and Fluid Design, with concurrence from System Engineering and Code Programs, has determined that there are no operability concerns with the three MSIVs that were no worked on in RFO-24.

Immediate corrective actions included the following:

- Repairing the three MSIVs that failed the as-found LLRT.
- Installing packing enhancements in 5 MSIVs: the 3 that failed the as-found LLRT and 2 others that had evidence of stem scoring
- Successfully retesting of all 5 MSIVs that were worked in RFO-24

Long-term corrective actions include the following:

- Formalizing maintenance practices and lessons learned into a procedure for MSIV valve maintenance and a separate procedure for MSIV actuator maintenance
- Implementation of higher MSIV LLRT leakage limits in accordance with the pending alternate source term (AST) license amendment.
- Implementation of an improved MSIV LLRT test method, as permitted by the pending AST license amendment.
- Review of the MSIV valve and actuator design in cooperation with the manufacturer, looking for opportunities to enhance MSIV performance.

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

**Report Narrative:**

*EVENT DESCRIPTION*

On April 4 and April 5, 2004, shortly after reaching a reactor coolant temperature less than 212°F, all eight MSIVs were as-found tested for leakage in accordance with the requirements of Technical Specification 4.7.A.4, PP 7006, and OP 4030. The results of the as-found testing were that 4 MSIVs had leakage rates less than 11 standard cubic feet per hour (scfh), and 4 MSIVs initially had leakage rates greater than 23 scfh. The acceptance criterion, given in Technical Specification 4.7.A.4, is = 23 scfh through each MSIV, and the combined maximum path leakage rate (MXPLR) for all four main steam lines is =46 scfh. As a result, the Action Limit for MSIVs is established by Vermont Yankee at 11.5 scfh. If no MSIV exceeds 11.5 scfh, then the combined MXPLR for all four lines will not exceed 46 scfh. If the leakage for an individual valve pair (inboard and outboard in the same line) is less than 11.5 scfh, the individual leakages are not typically determined, since the MXPLR for the line is less than 11.5 scfh.

Four Condition Reports were initiated for these four LLRT failures. In addition, a CR was initiated when it was identified that the 'B' main steam line inboard valve, V2-80B, had a galled stem that prevented valve motion. It has been determined that the valve became galled subsequent to the shutdown, since it stuck in the process of opening subsequent to the initial closure following reactor shutdown, and subsequent to the as-found LLRT. Although the leakage through the inboard valve, V2-80B could not be individually measured, it has been determined that the inboard valve had excessive leakage and that stem binding leading to imperfect seating was the failure mechanism (see CR-VTY-2004-955). It has also been determined by test that the outboard MSIV in the 'B' main steam line has a leakage rate less than 1.0 scfh. The initial apparent failure of the outboard valve is a consequence of the method used to separate outboard MSIV leakage from inboard leakage in a given main steam line. Therefore, there were actually 3 as-found MSIV LLRT failures in RFO-24.

With the number of as-found MSIV LLRT failures increasing linearly over the past 4 refueling outages, it was apparent that an adverse trend exists. It was the specific objective of this investigation to determine whether there is a common or similar cause that may call into question the long-term reliability and operability of the main steam isolation valves at Vermont Yankee.

All three MSIVs that failed their as-found LLRT in RFO-24 were disassembled and reconditioned. Only MSIV 80B had an internal condition that provided clear evidence of a failure mechanism (CR-VTY-2004-955). The other two MSIVs had what is characterized as "minor service-induced degradation." In addition, two other MSIVs were disassembled and refurbished, based on minor stem scoring. All 5 MSIVs that were disassembled were modified with an enhancement to optimize packing and stem alignment in the stuffing box (WOSE 2004-030)

All five valves successfully passed the as-left LLRT on the first attempt, indicating that the maintenance lessons learned over the past two refueling outages have been effective at reducing MSIV rework.

On the basis of demonstrated effective maintenance (successful as-left LLRT on the first test), it is concluded that the corrective actions taken during RFO-24 were effective at improving MSIV LLRT performance. Therefore, all 8 MSIVs are fully mission-capable and are ready for plant restart. Additional corrective actions will further improve MSIV LLRT performance.

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

This evaluation considered the following:

- Safety of the MSIVs; that is, whether or not the MSIVs are capable of performing their required safety functions.
- Whether the actions taken during RFO-24 can be reasonably expected to provide improved as-found LLRT performance in RFO-25.
- Causes of LLRT failures and corrective actions that would reduce the number of LLRT failures.
- Vermont Yankee is intolerant of unanticipated failures, and this adverse trend must be reversed.
- Emergent work for MSIV repair presents a burden to outage resources and a challenge to planning and scheduling.

This evaluation concludes that the MSIVs are fully mission-capable. Based on the success of the as-left testing performed following maintenance, all eight MSIVs are expected to maintain acceptable performance during the upcoming fuel cycle.

### BARRIER ANALYSIS RESULTS

#### *TIME LINE*

The Common Cause team was able to assemble the as-found MSIV LLRT results for Vermont Yankee going back to 1973, the year of commercial operation (Attachment 1). Attachment 5 shows by RFO and by year the number of as-found MSIV tests that exceeded 23 scfh.

Attachment 5 shows that in the 23 years prior to 1996, 4 MSIVs exceeded 23 scfh on their as-found LLRT, and that in the 6 years since 1996, 10 MSIVs exceeded 23 scfh on their as-found LLRT. That is, in the past 6 years, the number of MSIV as-found LLRT failures is 2.5 times what it was in the first 23 years of plant operation. A significant amount of this investigation was directed at determining why the LLRT performance of MSIVs changed after 1996.

Prior to 1996, the MSIV test method was a pressure buildup method conducted at 26 psig in the accident direction. Beginning in 1996, MSIVs have been tested by the makeup flow method by pressurizing between the inboard and outboard valves. This results in a reverse-direction test on the inboard valve, which, although conservative, unnecessarily penalizes both the inboard and the outboard valve recorded leakage rates (Attachment 2). It has been shown that 1 MSIV as-found failure of the 10 since 1996 is directly attributable to test method. Three others failed because the individual MSIV leakage rate limit was 11.5 scfh, which is unnecessarily restrictive.

#### *BARRIER ANALYSIS*

Attachment 4 is the Barrier Analysis Worksheet. The barriers that could have prevented this adverse trend are the following:

Procedures – There is no controlled procedure for maintenance of MSIVs. Existing proceduralized Packing Guideline (OP 5281) is too generic to address specific requirements for the MSIVs. For example, stuffing box dimensional checks are measured in inches as opposed to the nearest 0.001" and necessary stem centering/alignment techniques during valve packing are not addressed.

Change Management – When the MSIV LLRT test method was changed in 1996, there was insufficient appreciation of the potential for the change to have an adverse effect on MSIV leakage rate test results.

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

*EVENT ANALYSIS*

The following facts were identified, either through records research or interviews:

1. GE Specification 21A1062AC includes performance specifications for MSIVs. This specification was sent to the valve manufacturer, who certified that these specifications were met. These valves were procured as ASME Section III Class 1 components, and their performance requirements included the following:
  - Reliability: "The estimated number of operating cycles per year is 50 to 400 cycles" "The Seller shall take as a design objective that the valves shall have an extremely high level of reliability and an extremely high immunity to the effects of foreign objects upon valve closure."
  - Maximum pressure drop: The pressure drop at rated flow with the valve wide open shall not exceed 6.0 psi.
  - Leak tightness at 40 psig in the accident direction: " A low pressure air seat leakage test shall be conducted on each valve....The maximum permissible leakage rate shall be 0.1 scfh per inch of diameter of nominal valve size."
  - Leak tightness at 1000 psig in the accident direction: 2cc. per inch of seat diameter per hour at design pressure.
  - Ability to open against pressure: "the valves shall be capable of opening with a 200 psi differential across the plug...."
  - Ability to close against pressure
  - Closure speed: "The valve shall be capable of closing in 3 seconds...."
  - Closure speed adjustment: " The valve should be capable of being closed within 3 to 10 seconds...."
  - Hydraulic dampening at the end of the close stroke
2. The asbestos packing that was originally supplied with the valves was replaced with graphite packing in 1989. A 3.625" carbon steel spacer was installed above the stellite "junk ring" to provide the correct packing stack height, since the 5-ring graphite packing replaced the old packing which contained 10 asbestos rings (5 above and 5 below a lantern ring).
3. The original 3/8 inch stellite "junk ring" was left in all 8 MSIVs in 1989. In 1996, these stellite junk rings were removed from V2-80A, V2-86A, V2-80C, and V2-86D. The 3.625" carbon steel spacer was replaced by a 4.041" carbon steel spacer to maintain the correct dimensions in the stuffing box.
4. Prior to 1996, MSIVs were tested in the accident direction (pressure gradient from the reactor side to the outboard side) at a reduced pressure of 24-26 psid, using the pressure-buildup method.
5. Prior to 1996, MSIVs routinely passed LLRT for 6 to 8 consecutive refueling outages, and when they failed, the cause of the failure was clearly evident to the Maintenance personnel.

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

6. In 1996, it was identified that the MSIV test method did not comply with the Vermont Yankee licensing basis. Technical Specification 4.7.A.4 specifies the MSIV LLRT acceptance criterion, "when tested at =24 psig." The only reduced-pressure testing method acceptable to the ANSI standard governing leakage rate testing is a reverse-direction test. Therefore, the reduced pressure test in the accident direction that had been used prior to 1996 was not compliant with Technical Specifications. CR-VTY-96-0077 was initiated; LER 96-04 was submitted to NRC; and the test method was changed for the 1996 outage to the present method, where the inboard MSIVs are tested by the makeup flow method at reduced pressure in the reverse direction, while the outboard MSIVs continue to be tested at reduced pressure in the accident direction (the "between the valves" test method).
7. Since 1996, MSIVs typically pass LLRTs for 2 to 4 consecutive refueling outages, and when they fail, the cause of the failure is not clearly evident to the maintenance personnel.
8. In 1998, the junk ring and the 3.625" carbon steel spacer were replaced with a 4.041" spacer in the remaining 4 MSIVs .
9. Live-loaded packing was installed in the 'B' and 'C' steam line MSIVs in the 1998 outage (RFO-20); the live-loaded packing modification was made to the 'A' and 'D' MSIVs in 1999 (RFO-21).
10. A modification to prevent stem-disk separation was installed in 1998 and 1999 coincident with the live loaded packing assemblies. The 'B' and 'C' MSIVs were done in 1998, and the 'A' and 'D' MSIVs were done in 1999, coincident with the live-loaded packing modification.
11. Starting in RFO-23, the MSIV seating surfaces have been "skim-cut" prior to lapping to establish a factory-new angle and finish on the seating surfaces. This practice was instituted after lapping alone failed to produce consistent LLRT results.
12. Smart Stem glued-on strain gauges were applied to MSIV stems in 1998 and 1999. This provided the ability to measure stem forces in the valve, particularly the seating force when the valve closes. This modification was concurrent with the other modifications made in 1998 and 1999.
13. Typical seating forces, measured by the stem sensor strain gauges are 18,000 to 20,000 lbf. This seating force has been shown by experience and by test to produce leak-tight seating.
14. It can be shown by analysis that since 1996 4 MSIV LLRT "failures" actually had leakage less than 23 scfh.
15. It has been determined that since 1996, MSIV V2-80B has experienced a galled stem twice, and in both cases, the galled stem caused or contributed to the LLRT failure.
16. BWROG Licensing Topical Report NEDC-31858P, approved by NRC, and referenced as part of the VTY alternated source term license amendment (BVY 03-70), concludes that MSIV leakage could be increased to 200 scfh per main steam line without inhibiting the safety function of the MSIV. NEDC-31858 also found that a leakage rate of 200 scfh for an MSIV does not represent abnormal or excessive leakage for a valve of this size and type.
17. The flow area that will pass 100 scfh at 26 psig is equivalent to an orifice with 0.054" diameter. The flow area that will pass 23 scfh at 26 psig is equivalent to a 0.026" orifice.
18. The only foreign material that has been positively identified in MSIVs is red rust.

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

19. Since 1996, only 2 MSIV as-found LLRTs have exceeded the 100 scfh "minor leakage" criterion: MSIV 80C in 1998; and MSIV 80B in 2004 (Attachment 3).. Both failures had readily identifiable mechanical causes.
20. The root cause analysis performed for CR-VTY-2002-2211/2212 identified 13 potential mechanisms or factors that could lead to LLRT failures. These are discussed in Attachment 6.
21. Attachment 7 lists the causes identified for the MSIV as-found LLRT failures from 1996 through 2004.

CONCLUSION

The conclusion of this investigation is that there is an adverse trend in as-found MSIV LLRT performance, starting in 1996 (RFO-19). Some as-found MSIV LLRT failures are due to clearly identifiable mechanical causes. Two MSIV failures were attributed to mechanical binding caused by valve stem misalignment. Another cause of this adverse trend is the MSIV LLRT test method. And some failures have no detectable common or similar cause. The cause is not design, application, environment, or maintenance practices. Each of these factors was proposed and evaluated for its validity (Attachment 6). No single causal factor explains all the as-found MSIV LLRT data since 1996. The elimination of this adverse trend requires corrective actions that address those failure mechanisms that have been identified, as well as corrective actions that continue to monitor the effectiveness of the actions.

Although the design of the installed MSIVs is less than optimal for a BWR MSIV, valve design by itself cannot account for an excessive as-found LLRT failure rate or for the adverse trend experienced at Vermont Yankee. The common factors that emerged from this investigation are the following:

- Maintenance – a recognition that MSIVs have extremely tight tolerances for several critical dimensions is a relatively recent awareness in the BWR industry. The manufacturer's criteria for some of these tolerances have been reduced since 1998. At Vermont Yankee, the disassembly, measurement, refurbishment, and reassembly process has not been sufficiently formal to ensure that appropriate actions are taken to maintain these identified critical dimensions.
- Acceptance Criteria – The manufacturer has stated that the current leakage acceptance criteria are unrealistic and cannot be consistently achieved. Licensing Topical Report NEDC-31858P concludes that 200 scfh is not abnormal or excessive for valves of this size and type. Plants with acceptance criteria of 23 scfh per valve or less have as-found failure rates at least twice as high as those plants that have acceptance criteria of 100 scfh per valve.
- Test method – All 4 plants in the BWROG survey with low acceptance criteria test between the MSIVs at reduced pressure. Only one plant responding to the BWROG survey (Duane Arnold) tests in the accident direction at accident pressure. The average leakage rate for that plant's MSIVs is "less than 20 scfh," according to the survey response. Therefore, Duane Arnold's LLRT success is due to more than high acceptance criteria. It is reasonable to attribute some of their success to the test method that most closely duplicates the expected conditions following an actual closure to isolate the containment.

**CR-VTY-2004-0918**  
**“MSIV As-Found LLRTs Show An Adverse Trend”**  
**Adverse Trend Common Cause Analysis**

Valve Design – The valves were specified, designed, and manufactured to be safe and highly reliable. In service, they are safe and adequately reliable. However, they require more maintenance due to failed LLRTs than is consistent with a valve with considerable design tolerance. The valve design is not tolerant of less-than-optimal test methods or minor deviations from certain critical dimensions. The valve actuator produces a seating force of approximately 18,000 to 20,000 lbf. The same valve (V10-27A, B) in the RHR system with a motor operator has a seating force of over 140,000 lbf. The RHR valves do not have leakage rate failures. There is not a single CR in PCRS documenting a leakage rate failure of either V10-27A or V10-27B. Because the seating force in the MSIVs is marginal, leakage rate results become susceptible to a number of service conditions that are less than optimal. For instance, reverse-pressure testing, which reduces the total seating force by nearly 4,600 lbf may result in excessive seat leakage. The valves also have several critical dimensions which have tolerances as small as 0.001? in some cases. If these dimensions are not within tolerance, it results in adverse effects on the measured valve leakage rate. It must be emphasized that the seating force during an actual containment isolation event would be greater than the force exerted by the actuator alone. Therefore, the marginally sized actuator penalizes minor imperfections in the valve during LLRT but does not affect the valve’s ability to perform its safety function.

**Causes of the Condition:**

**Common Cause**

No single cause can be shown to meet the tests for a common cause. The causes listed below each partially account for the identified failures, and when corrected, these corrective actions can reasonably be expected to reduce LLRT failures to an acceptable level (less than 1 per RFO). Therefore, this adverse trend does not have a single common cause. It has four contributing causes.

**Contributing Causes**

**CC-1 [F.4.b.2] Document Use Practices; Procedure Not Followed Correctly**  
CR-VTY-2002-2211/2212 identified CC #1 as B.5.a.2, “No procedure/document; procedure/document needed but has not been written. The root cause evaluation contained a corrective action commitment to “...incorporate lessons learned in an ENVY procedure.” Contrary to the wording of the corrective action, this commitment was closed as complete after developing work order step text for MSIV work. A procedure is still needed and still has not been written. A separate CR (CR-VTY-2004-1499) has been initiated to address this inappropriate closure. The lack of a formal procedure is directly responsible for out-of-tolerance measurements being recorded on a WO in RFO-24 and no action being taken. This could not have happened if the requirements were in a controlled procedure with acceptance criteria. In addition, the critical evolution of centering the bonnet on the valve body is not proceduralized. It is performed by experienced personnel who remember how it was done the last time.

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

CC-2

**[O.3.z.2] Testing: Other. The MSIV LLRT acceptance criterion is unnecessarily restrictive and produces failure determinations for valves that have minor and inconsequential leakage.**

It was recognized in the 1990s that the MSIV LLRT acceptance criterion of 11.5 scfh was unnecessarily restrictive. A Technical Specification amendment was submitted and approved to raise the limit to the present 23 scfh per valve and 46 scfh total MXPLR for all 4 steam lines. It was further recognized that many BWRs have MSIV acceptance criteria of 100 scfh per valve or higher. Eight BWRs responding to the BWROG survey reported that they have limits of 100 scfh or higher. Nine BWRs responding to the BWROG survey reported that they have limits between 11.5 and 46 scfh per valve. The pending Alternate Source Term (AST) License Amendment will provide a maximum leakage through an MSIV of 62 scfh. Had this criterion been in place since 1996, there would have been a total of 3 as-found MSIV failures between 1996 and 2004.

CC-3

**[L.1.c.2] Personnel exhibited insufficient awareness of the impact of actions on reliability.**

In 1996 when the test method was changed from pressure-buildup to makeup-flow, it was recognized by the Appendix J coordinator that the new method, which involves pressurizing between the MSIVs, had the potential to produce an increased number of MSIV LLRT failures. However, the consequences of the changed test method were not fully felt, since there was only one as-found MSIV LLRT failure in 1996. Although there were multiple as-left MSIV LLRT failures in 1996 and 4 as-found MSIV LLRT failures in the subsequent outage (1998), the change in test method was not identified as a contributing cause. Therefore, the focus was increasingly on maintenance as the cause and cure of poor leakage rate performance. Even though maintenance has steadily improved since 1996, maintenance alone cannot be expected to compensate for the other factors that challenge MSIV LLRT performance.

CC-4

**[M.2.z.2] Design Analysis, Other**

The design of the MSIVs, while safe and adequately reliable, is not tolerant of less than optimal test method or minor deviations from certain critical dimensions. Pressurizing the valves with 26 psid in the reverse direction, rather than 45 psid in the accident direction, can have pronounced adverse effects on the measured leakage rate. Some tolerances inside the valve are as small as 0.001", as in the packing follower to stem clearance.

**Response to Specific CRG Instructions/Additional Considerations:**

NONE

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

**Extent of Condition:**

Effects on equipment:

Susceptible equipment was considered potentially to be the population of globe valves that are leakage rate tested. There are 34 globe valves that are leakage rate tested in the IST program. Of these, 16 are 1.0 inch solenoid-operated valves. A PCRS search of these 16 component IDs produced one hit for a failed seat leakage test. Therefore, these 16 valves do not have an adverse trend in leakage rate and are not part of an extent of condition.

Six of the 34 globe valves are motor-operated. A PCRS search of these 6 component IDs produced zero hits for a failed leakage rate test. Therefore, these 6 valves do not have an adverse trend in leakage rate and are not part of an extent of condition.

The remaining 12 valves are air-operated globe valves. Eight of these 12 are the MSIVs, the subject of this investigation. The last 4 air operated globe valves that are leakage rate tested are two PCAC compressor inlet isolation valves and two reactor sample line isolation valves. A PCRS search of these 4 component IDs produced one hit for a failed seat leakage test. Therefore, these 4 valves do not have an adverse trend in leakage rate and are not part of an extent of condition.

Therefore, there are no equipment-related effects that could constitute an expanded extent of condition. The equipment identified in this CR, the eight MSIVs, is the whole extent of condition.

Effects on process or programs:

Since the safety function that is challenged by an MSIV failing its LLRT is leak-tightness of the primary containment, the process or program element that would justify an expanded extent of condition would be an adverse leakage trend in some other group of primary containment isolation valves, or in primary containment isolation valves as a whole. No such trend exists. Therefore, there are no process or program related effects that could constitute an expanded extent of condition.

Effects on human performance:

This is not a human-performance related event, as shown by the identified contributing causes.

Existing generic or common mode considerations:

The objective of this investigation was to identify, if possible, any generic, common, or root causes for the MSIV LLRT failures. No single common cause was identified. It was identified that the closing force of the actuator is a contributing cause. However, no other air-operated globe valves that are leakage rate tested have any history that suggests their actuator closing force is an issue.

Level of risk:

The risk associated with contributing cause #1 is low, based on the fact that the linkage between valve performance and a maintenance procedure that exceeds the normal standards for detail is unique to MSIVs.

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

The risk associated with contributing cause #2 is low, based on the determination that nearly all MSIV LLRT failures have been due to minor leakage that did not challenge the ability of the containment to provide an essentially leak tight barrier. LLRT limits have built-in conservatism, and these MSIV LLRT results have never resulted in exceeding the containment leakage rate surveillance limit ( $0.6 L_a$ ). This assessment is strengthened by the pending approval of higher MSIV leakage rate criteria with the Alternate Source Term license amendment.

The risk associated with contributing cause #3 is low, based on the fact that MSIVs are unique in being tested in the reverse direction at reduced pressure. All other containment isolation valves are tested in the accident direction at full accident pressure. Therefore, there are no similar test method issues lying latent.

The risk associated with contributing cause #4 is low, based on the fact that LLRT performance for all other globe valves has been excellent. Globe valves tested in the reverse direction are the only containment isolation valves that could be vulnerable to LLRT failure resulting from marginal actuator seating force. Therefore, only the MSIVs are susceptible to this failure, and corrective actions have been initiated which address the design aspects, as well as providing test and maintenance methods that recognize and compensate for the design issues.

**Related Operating Experience:**

**Previous Related Conditions (ENVY):**

Vermont Yankee has had a total of 14 as-found LLRT failures on MSIVs since the start of commercial operation in 1973. Four of these failures occurred prior to 1996, when the test method was a reduced-pressure-buildup test. The validity of this method relies on a number of assumptions that could not be verified and instrumentation that could not be obtained with the required accuracy. The low incidence of MSIV failures prior to 1996 is therefore more the result of a non-conservative test method than an indication of actual valve condition.

Starting in 1996, the test method was changed to the present method: makeup flow between the MSIVs at reduced pressure. This method fully complies with the VY Technical Specifications, and with the ANSI Standard 56.8 which governs containment isolation valve leakage rate testing. Of the 10 as-found failures beginning in 1996, 1 can definitely be attributed to test method; 3 failed because the acceptance criterion was established at 11.5 scfh, rather than the present 23 scfh; 3 have definitely identified mechanical causes; and 4 have no specifically identified cause (Attachment 3). The causes given for these four LLRT failures are: corrosion products/foreign material (1 valve in 2001 after >10 years of service); randomly deposited corrosion products or debris (1 valve in 2002 after 4.5 years of service); and minor inservice degradation (2 valves in 2004 after 6 and 7.5 years of service).

In 1998, MSIV-80B failed its LLRT (CR-VTY-1998-476) due to a galled stem. The WO 98-2519 notes describe a condition similar to that found in 2004. However, no corrective action was taken to identify and capture the critical measurements and dimensions in MSIVs. This same CR identified valve design, valve maintenance, and containment LLRT methods as contributing factors to the cause of LLRT failures in 4 MSIVs. However, none of the corrective actions established for CR-1998-476 addressed valve design or LLRT methods. The corrective actions focused on the effectiveness of the MSIV

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

maintenance performed in 1998; mockup training for MSIV maintenance; and planning and scheduling activities associated with MSIVs.

In RFO-23, during 2002, the 'B' steam line MSIVs were tested a total of 7 times, and each valve was disassembled twice before achieving satisfactory LLRT results. CR-VTY-2002-2211 and CR-VTY-202-2212 were Category A CRs with RCA required. Contributing Cause number 2 (CC-2) was, "Procedure Needed But Not Written." A Corrective Action was assigned to Maintenance Support to incorporate the RFO-23 MSIV experience into an "ENVY procedure." No ENVY procedure for MSIV maintenance exists, although the commitment is closed. A significant level of effort was devoted to developing maintenance methods, practices, tooling, measurements, acceptance criteria, and required actions. In short, the work was done to produce a procedure, but the "procedure" is actually a Work Order template that generates step text. Work Order step text is not a procedure, and it is not subject to the same review and approval controls as a procedure. It is not sufficiently formal for MSIV work.

**Related Industry OE:**

Using the search string, "BWR and MSIV and (leakage or LLRT)," the INPO web site returned 158 hits. Virtually all of these hits describe MSIV LLRT failures at BWRs. This simply reinforces the informal consensus among pump and valve program owners that MSIV LLRT failures are a significant continuing issue. Certain changes to maintenance practices have been reported as contributing to more reliable LLRT performance, and these are addressed in the corrective actions proposed for this CR.

Although there is also consensus that the Wye-pattern globe valve is less-than-optimal from a design and application point of view, there are few LLRT failures directly attributable to valve design. Nevertheless, several valve modifications have been produced or endorsed by the valve manufacturer.

These modifications have all been implemented at Vermont Yankee. Two of these modifications could be expected to improve LLRT performance. Both the packing modification, which reduced packing friction; and guide rib and wear pad enhancements, which reduced seating friction, could be expected to improve MSIV LLRT performance. Their effectiveness at reducing LLRT failures is not yet demonstrated.

A survey by BWROG in 2001/2002 identified the following information that is relevant to this CR. A total of 6 BWRs, comprising 5 stations, have Rockwell-Edwards MSIVs. The most reliable predictor of LLRT results for these BWRs is whether the Technical Specification acceptance criterion is 11.5-23 scfh per valve or 100 scfh per valve. The 4 units with low acceptance criteria have as-found LLRT failure rates ranging from 12.5% (VTY) to 33% (Brunswick Unit 2). For the units with a limit of 100 scfh per valve, the failure rate is approximately 6.25%.

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

A significant fact is that one plant with high acceptance criteria has quite low average MSIV leakage rates. That plant tests in the accident direction at accident pressure on both the inboard and the outboard valve. The implication is that test method is directly related to as-found failure rates. When the test method closely simulates the actual accident condition, the failure rate is low. The between-the-valves test method, while conservative, apparently penalizes the valves under test and produces leakage rate results that indicate a higher failure rate than a more realistic test method would produce. Plants with the higher limit and that test between the MSIVs have fewer failures (due to the higher limit), but have relatively high MSIV leakage rates (a combination of test method, preventive maintenance weaknesses, and the failure to implement recommended design changes).

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

**Corrective Actions:**

<b>Immediate/Interim Actions Completed</b>	
Item #	Action Taken
CC-1	Although a procedure does not exist, much of the work required to develop one has been put into writing the MSIV maintenance guide.
CC-3	Main Steam Line plugs were purchased as a result of CR-VTY-2002-2211/2212. These plugs are superior to the old plugs in that they were installed in 4 hours total, and have been used at 45 psig to test steam line isolation valves in the HPCI and RCIC systems.
CC-2	The Alternate Source Term Amendment has been submitted and approval is expected prior to the end of 2004. This amendment will include the provision that MSIV leakage will be limited to a maximum of 62 scfh per valve and that testing will be in accordance with the Appendix J program, which means they will be tested in the accident direction, as all other containment isolation valves are tested.
CC-1	During RFO-24 many critical dimensions in MSIVs were identified, measured, and recorded.

<b>Proposed/Assigned Corrective Actions</b>					
Item #	Action	CA Type	Assigned Department	Due Date	CA #
CC-1	<p>Develop a controlled MSIV <u>VALVE</u> maintenance procedure that adequately describes the required as-found dimensions, the acceptance criteria for the dimensions, the action required for out-of-tolerance dimensions, the disassembly process, the refurbishment process, the reassembly process, and the post-maintenance test requirements and acceptance criteria.</p> <p>This procedure will address both packing and valve internals maintenance. It is intended that this procedure will be a stand-alone reference for all MSIV maintenance work.</p> <p>This corrective action is assigned in CR-VTY-2004-955 CA-04. Therefore, it has no CA number for CR-2004-918.</p>	LTCA	Maintenance Support	3/31/2005	n/a
CC-1	<p>Develop a controlled MSIV <u>ACTUATOR</u> maintenance procedure that adequately describes the required as-found dimensions, the acceptance criteria for the dimensions, the action required for out-of-tolerance dimensions, the disassembly process, the refurbishment process, the reassembly process, and the post-maintenance test requirements and acceptance criteria.</p> <p>It is intended that this procedure will be a stand-alone reference for all MSIV Actuator maintenance work.</p>	LTCA	Component Engineering	3/31/2005	02

**CR-VTY-2004-0918**  
**“MSIV As-Found LLRTs Show An Adverse Trend”**  
**Adverse Trend Common Cause Analysis**

<b>Proposed/Assigned Corrective Actions</b>					
Item #	Action	CA Type	Assigned Department	Due Date	CA #
CC-2	Implement the pending Alternate Source Term license amendment that contains higher MSIV leakage limits. This is covered by BVY-03-70, Technical Specification Proposed Change 262.	LTCA	Code Programs	9/30/2004	03
CC-3	Develop a test method that safely and effectively tests both the inboard and the outboard MSIVs individually at accident pressure ( $P_a$ ) in the accident direction. A method for as-found testing shall be developed, and a method for as-left testing, if the as-found test cannot be practicably used for as-left testing.	LTCA	Code Programs	12/1/2004	04
CC-4	Develop a plan, using the Engineering Request process, to identify and implement design changes to improve MSIV valve and actuator design for long-term reliability. This plan shall include planned MSIV modifications for RFO-25 and beyond. Vendor involvement is necessary and mandatory.	CA	System Engineering	8/31/2004	05

**Personnel Interviewed:**

Rich Booth, Component Engineering  
 Larry Doucette, Maintenance  
 Larry Prill, JAF  
 Joe Boivin, VY System Engineering  
 Rick Gerdus, VY Operations Chemist  
 Mike Ball, Design Engineering and former Appendix J Program Coordinator  
 Ted Underkoffler, Appendix J Program Coordinator

**Keywords:**

Documentation; Formality; PCLRT; LLRT, MSIV, Planning; White Board

**Attachments:**

- ATTACHMENT 1: MSIV As-Found LLRT Failures By Year Since 1973
- ATTACHMENT 2: Analytical Explanation of MSIV LLRT Results
- ATTACHMENT 3: Data Analysis Based on the Analytical Model
- ATTACHMENT 4: Barrier Analysis Worksheet
- ATTACHMENT 5: Detailed Timeline
- ATTACHMENT 6: Evaluation of MSIV LLRT Failure Mechanisms
- ATTACHMENT 7: MSIV LLRT Details, 1996 – 2004

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

**ROOT CAUSE TEAM MEMBERS**

Rich Rusin  
Jim Taylor  
Larry Prill (JAF)  
George Short  
Mike Annett  
Larry Lukens

**REFERENCES**

AP 0009, Event Reports  
AP 0167, Operability Determinations  
ENN-OP-104, Operability Determinations  
ENN-LI-102, Corrective Action Process  
OP 4261  
PP 7204, Safety and Relief Valve Program  
PP 7013, Inservice Testing Program

CR-VTY-2004-0918  
"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis

ATTACHMENT 1

MSIV AS-FOUND LLRT FAILURES BY YEAR

RFO	YEAR	AS-FOUND LLRT>23 scfh
	1973	2
	1974	1
4	1976	0
5	1977	0
6	1978	0
7	1979	0
8	1980	0
9	1981	0
10	1983	0
11	1984	0
12	1985	1
13	1987	0
14	1989	0
15	1990	0
16	1992	0
17	1993	0
18	1995	0
19	1996	1
20	1998	4
21	1999	0
22	2001	1
23	2002	2
24	2004	4

**CR-VTY-2004-0918**  
**“MSIV As-Found LLRTs Show An Adverse Trend”**  
**Adverse Trend Common Cause Analysis**

**ATTACHMENT 2**

**ANALYTICAL EXPLANATION OF MSIV LLRT RESULTS**

Test volume is modeled as a fixed volume with a fixed orifice representing the inboard seat, and a fixed orifice representing the outboard seat. In the first test, the outboard orifice has a dP of 26 psid, and the inboard orifice has a dP of 26 psid, both from inside to outside of the test volume. On the second test, the outboard orifice has a dP of 26 psid, and the inboard orifice has a dP of 2 psid.

Since the flow through a fixed orifice is proportional to the square root of the pressure difference across the orifice, the flow through the outboard orifice is the same in both tests, while the flow through the inboard orifice is reduced by the square root of the ratio of the two pressure differences across the inboard orifice, namely 2 psid and 26 psid. This yields an inboard orifice flow of 0.277 times the initial flow when the inboard differential is 2 psid.

$$Q \propto \sqrt{P}$$
$$Q_1 \propto \sqrt{P_1}$$
$$Q_2 \propto \sqrt{P_2}$$
$$\frac{Q_1}{Q_2} \propto \sqrt{\frac{P_1}{P_2}}$$
$$\frac{Q_1}{Q_2} \propto \sqrt{\frac{2}{26}} \propto 0.277$$

Solving the two resulting equations simultaneously yields predicted outboard and inboard flows.

*I = O = Combined Measurement*

*0.277 \* I = O = Outboard Measurement*

By solving these equations simultaneously, the original values of inboard (I) and outboard (O) leakage can be obtained.

This analysis rests on an important assumption: the inboard and outboard orifice sizes do not change between the first, combined test and the outboard test.

When the inboard orifice size changes, it will become smaller, due to the pressurization sequence that pressurizes the inboard valve to 24 psig first, producing additional seating force on the inboard valve, and then pressurizes the test volume to 26 psig, achieving the required 2 psid for the test condition. The effect on predicted leakage is that the calculated outboard leakage decreases, usually going negative. A small change in inboard leakage is required to produce this effect in the calculation, typically a change from 0.277 to 0.15 or greater. A change from 0.277 to .015 corresponds to a reduction in the inboard valve flow area of 45.8%. The physical explanation for the negative number is that the inboard leakage has decreased due to tighter seating in the second test. This is caused by the pressurization sequence described previously.

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

The results of this analysis are the following: in every case, the inboard leakage predicted by the model is greater than the inboard leakage reported for the test, and the outboard leakage predicted by the model is less than the outboard leakage reported for the test.

This model has practical value only if it can show that a valve was worked unnecessarily. In RFO-19, the as-found LLRT for MSIV 86B was measured at 15.098. It was reworked, and a subsequent test passed at 9.24 scfh. However, the model shows that the initial inboard leakage was 13.2 and the initial outboard leakage was 11.4. Following the repair, the model shows that the inboard leakage was 14.0, and the outboard leakage was 5.4. It appears that the worst valve of the pair was the inboard valve, and the fact that fixing the outboard valve reduced the total line leakage to an acceptable value was fortuitous.

In RFO-20, the initial leakage reported by LLRT for the 'C' main steam line was 93.3 for the outboard and 406.7 for the inboard. Both valves were worked. The model shows that the outboard valve initially had little or no leakage. However, it had been previously scheduled for maintenance and modification, so this difference didn't result in unscheduled work.

In RFO-23, the 'B' main steam line as-found LLRT result was 35 scfh for the outboard and 46.4 for the inboard. Both valves were worked. The model shows that the outboard valve initially had little or no leakage, and that it was worked unnecessarily. It failed a subsequent test, resulting in a second disassembly.

In RFO-24, the B main steam line as-found LLRT result was 43.8 scfh for the outboard and 119.0 scfh for the inboard. The outboard valve was not worked, because it was realized that the pressurization sequence affects the indicated leakage rate. The model shows that the outboard valve initially had little or no leakage. This was confirmed by a LLRT that showed less than 1.0 scfh on the outboard valve.

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

**ATTACHMENT 3**

**DATA ANALYSIS**

The following table is the spreadsheet that solves the simultaneous equations for all tests since 1996 that determined individual leakage rates for the inboard and outboard valves. The acceptance criterion changed in 1999 (RFO-21) from 11.5 scfh per valve to 23 scfh per valve, in accordance with Technical Specifications.

		Reported	CALCULATED
RFO-18	Inboard + Outboard	16.8	
Line D	Outboard (86)	16.3	16.1
As-Found	Inboard (80)	0.4	0.6
Evaluation: No change; both passed on current criteria.			

		Reported	CALCULATED
RFO-19	Inboard + Outboard	33.4	
Line A	Outboard (86)	25.5	22.5
As-Found	Inboard (80)	7.9	10.9
Evaluation: 86A would have passed marginally with a better test.			

		Reported	CALCULATED
RFO-19	Inboard + Outboard	21.7	
Line A	Outboard (86)	5.1	-1.3
As-Left	Inboard (80)	16.7	23.1
Evaluation: No change in result; 80A still needed work.			

		Reported	CALCULATED
RFO-19	Inboard + Outboard	24.7	
Line B	Outboard (86)	15.1	11.4
As-Found	Inboard (80)	9.6	13.2
Evaluation: Both passed with current acceptance criteria. However, 86B was worked. 80B actually had the higher leakage.			

		Reported	CALCULATED
RFO-19	Inboard + Outboard	19.3	
Line B	Outboard (86)	9.2	5.4

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

As-Left Inboard (80) 10.1 14.0  
 Evaluation: 86B leakage dropped significantly; 80B leakage didn't change. Worked the wrong valve, but the line passed.

		Reported	CALCULATED
RFO-19	Inboard + Outboard	33.2	
Line C	Outboard (86)	24.2	20.7
As-Left	Inboard (80)	9.1	12.5

Evaluation: 86C was worked; it was actually greater than the acceptance criterion in use in RFO-19. Using current criteria, it would have changed from fail to pass, using a better test method.

		Reported	CALCULATED
RFO-19	Inboard + Outboard	19.4	
Line D	Outboard (86)	16.1	14.9
As-Left	Inboard (80)	3.2	4.5

Evaluation: 86D exceeded the criterion in use in RFO-19. No change in result.

		Reported	CALCULATED
RFO-20	Inboard + Outboard	73.0	
Line B	Outboard (86)	32.5	17.0
As-Found	Inboard (80)	40.5	56.0

Evaluation: 86B exceeded the criterion in use in RFO-20. No change in result.

		Reported	CALCULATED
RFO-20	Inboard + Outboard	500.0	
Line C	Outboard (86)	93.3	-62.8
As-Found	Inboard (80)	406.7	562.8

Evaluation: 86C would not have failed. However, it was scheduled for maintenance and modification anyway.

		Reported	CALCULATED
RFO-22	Inboard + Outboard	18.8	
Line C	Outboard (86)	8.8	4.9

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

As-Found    Inboard (80)                    10.0        13.9  
 Evaluation: Both passed; no change

		Reported	CALCULATED
RFO-22	Inboard + Outboard	87.7	
Line D	Outboard (86)	12.5	-16.3
As-Found	Inboard (80)	75.2	104.0
Evaluation: Only 80D was worked. No change in result.			

		Reported	CALCULATED
RFO-23	Inboard + Outboard	81.4	
Line B	Outboard (86)	35.0	17.2
As-Found	Inboard (80)	46.4	64.2
Evaluation: 86B would have passed. It was worked unnecessarily.			

		Reported	CALCULATED
RFO-23	Inboard + Outboard	225.0	
Line B	Outboard (86)	60.0	
As-Left #1	Inboard (80)	165.0	
Evaluation: 80B was clamped shut. The 86B result is valid.			

		Reported	CALCULATED
RFO-23	Inboard + Outboard	20.0	
Line C	Outboard (86)	8.8	4.4
As-Found	Inboard (80)	11.3	15.6
Evaluation: Both passed; no change in result.			

		Reported	CALCULATED
RFO-24	Inboard + Outboard	28.8	
Line A	Outboard (86)	26.3	
As-Found	Inboard (80)	2.5	
Evaluation: The sequence of pressurization was changed. The 86A result is valid.			

		Reported	CALCULATED
RFO-24	Inboard + Outboard	162.9	
Line B	Outboard (86)	43.9	-1.8
As-Found	Inboard (80)	119.0	164.7

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

Evaluation: 86B would have passed. This was demonstrated by test after clamping 80B shut.

		Reported	CALCULATED
RFO-24	Inboard + Outboard	85.0	
Line C	Outboard (86)	75.2	71.4
As-Found	Inboard (80)	9.8	13.6

Evaluation: 86C was an actual failure. No change in result..

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

ATTACHMENT 4

BARRIER ANALYSIS WORKSHEET

CONSEQUENCE(S)	BARRIER(S) THAT SHOULD HAVE PRECLUDED	BARRIER ASSESSMENT [WHY THE BARRIER(S) FAILED]
Emergent, Unnecessary MSIV maintenance	Consistent, documented maintenance procedures	No procedure exists.
Excessive LLRT Failures	Test Method; Change Management; Robust Valve and Actuator Design  Valve Orientation  Correct Clearances and Seat-to-Guide Alignment; Seat Concentricity; Seat Contact	There was inadequate appreciation of the potential for the change in test method to compromise test results.  Plant piping configuration is not consistent with the orientation intended by the valve manufacturer  There are no procedure-driven measurements with acceptance criteria and actions for non-conformance.
Rework: Assembly and disassembly methods can be inconsistent and dependent on individual worker's knowledge and skill.	Procedures Training Workmanship	Procedures do not exist for valve disassembly, capturing as-found dimensions and condition, comparison of as-found data to acceptance criteria, comparison of as-left dimensions to acceptance criteria, and reassembly. This highly sensitive maintenance evolution relied on WO step text.



**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

**ATTACHMENT 5**  
**Detailed Timeline**

The following table shows by RFO and by year the number of as-found MSIV tests that exceeded 23 scfh. Although the individual valve criterion prior to 1999 was 11.5 scfh per valve by Technical Specification, the value of 23 scfh was chosen as the criterion for consistency of comparison. This is the maximum that a single valve may leak and still permit the total leakage criterion of the current Technical Specification to be met.

<b>YEAR</b>	<b>EVENT</b>
1973	2 MSIV as-found LLRT failures
1974	1 MSIV as-found LLRT failure
1976 – 1984 (8)	0 MSIV as-found LLRT failures
1985	1 MSIV as-found LLRT failure
1989	Packing modified from 10 rings asbestos to 5 rings graphite
1987 – 1995 (5)	0 MSIV as-found LLRT failures
1996 RFO-19	CR-VTY-1996-0077 and LER 96-04 identified that MSIV LLRT method was not compliant with the licensing basis. Test method changed to the current 26 psig "between the valves" method, which tests the inboard valve in the reverse direction and continues to test the outboard valve in the accident direction at reduced pressure.
1996 RFO-19	1 MSIV as-found LLRT failure (attributable to test method)
1996 RFO-19	4 MSIV stellite junk rings removed; packing spacer increased from 3.625 to 4.041 inches
1998 RFO-20	4 MSIV as-found LLRT failures (2 attributable to test method)
1998 RFO-20	Remaining 4 MSIV stellite junk rings removed; packing spacer increased from 3.625 to 4.041 inches
1998 RFO-20	MSIV 80B galled stem (identified as the cause of the LLRT failure)
1998 RFO-20	Live-loaded packing, smart-stem strain gauges, and disk-stem separation prevention modification installed on B & C MSIVs
1999 RFO-21	0 MSIV as-found LLRT failures
1999 RFO-21	Live-loaded packing, smart-stem strain gauges, and disk-stem separation prevention modification installed on A & D MSIVs
2001 RFO-22	1 MSIV as-found LLRT failure (not attributable to test method)
2002 RFO-23	2 MSIV as-found LLRT failures (1 attributable to test method)
2004 RFO-24	4 MSIV as-found LLRT failures; corrected back to 3 MSIV as-found LLRT failures (none attributable to test method)
2004 RFO-24	MSIV 80B galled stem; CR-VTY-2004-955 (identified as the cause of the LLRT failure)

**CR-VTY-2004-0918****"MSIV As-Found LLRTs Show An Adverse Trend"  
Adverse Trend Common Cause Analysis****ATTACHMENT 6****Evaluation of LLRT failure mechanisms**

The root cause analysis performed for CR-VTY-2002-2211/2212 identified the following potential mechanisms or factors that could lead to LLRT failures. The discussions have been updated to make them current with available information as of RFO-24.

- **Seat Geometry:** Vermont Yankee (Rockwell/Edwards) seat geometry is cone-in-cone with full seat contact. Although this geometry is less forgiving than others with respect to seat leakage should misalignment occur, seat geometry as a parameter was judged to be not a primary contributor to high leakage.
- **Inadequate Actuator Loading:** Inadequate actuator loading was considered a potential contributor to MSIV leakage since increased actuator loading can reduce seat leakage. It should be noted that net seat loading is reduced on the inboard valve when LLRT test pressure is applied between the valves. Actuator loading, although not a primary contributor to high leakage, may improve leakage performance under low leakage conditions if increased.
- **MSIV Aging:** The age of MSIVs in BWR plants varies widely in terms of actual life and service time. This was considered a potential contributing factor to LLRT failure since it can be postulated that the effect of wear on valve and actuator internals as a function of time can have an adverse impact on LLRT performance. This theory was subsequently dismissed, however, on the basis that the LLRT failure data clearly show that MSIVs of all ages have had failures without significant differences in the ratio of tests passed to tests failed. The concept of "age" in a BWR MSIV is somewhat specious anyway. Since MSIVs are routinely disassembled, examined, refurbished, and reassembled to original manufacturer's specifications, it isn't clear what could "age" in an MSIV. At VY, there is an apparent correlation between service time and LLRT failure. This is the only age-related correlation that could be established.
- **Valve Damage:** Valve damage has resulted from steam flow and improper maintenance; however, steam cutting or erosion of the main seats has not been observed during valve inspections since 1996. Flow-induced damage can include valve stem bending, valve stem disc separation and damage to the guide ribs. Improper maintenance has resulted in the galling of the yoke rods, valve stem and pitting of the valve stem, as well as damage to the valve seat. Damage to the stem affects stem leak tightness, which is not related to main seat leakage but could affect valve cycle time and could reduce the effectiveness of the actuator force. These comments apply to BWRs generally, but not to VY specifically. There are no documented or reported instances at VY of stem damage affecting measured MSIV stroke time.
- **LLRT Pressurization Method:** Currently, the most common method among BWRs for applying LLRT pressure is to pressurize between the inboard and outboard MSIVs. This is considered a potential LLRT failure contributor for

## CR-VTY-2004-0918

### “MSIV As-Found LLRTs Show An Adverse Trend” Adverse Trend Common Cause Analysis

inboard valves that modestly exceed the acceptance criteria. This is because the applied pressure is in a direction that is opposite to the flow that will oppose the actuator force and decrease the net seat loading. This factor can be regarded as a legitimate potential contributor only for low leakage failures on inboard valves.

- **Closing Procedures:** Present BWR practices vary from closing the MSIVs while the system is pressurized and flow exists to closing them after the system has been fully depressurized and no flow exists. The assistance to closure provided by flow and pressure may assist moderately leaking valves in passing the LLRT. At VY, the MSIVs are fast-closed shortly before the reactor coolant temperature reaches 212°F. This is the close stroke that establishes the test boundary for the as-found LLRT. This method is conservative compared to the conditions when primary containment isolation would actually be required during an event.
- **Foreign Deposits:** Heavy corrosion deposits or construction debris have been found in some valves after disassembly, following failure of pre-operational leak rate tests. Such material interfered with closure of the valve and produced excessive leakage. However, after plants have been in operation, subsequent accumulations have been insignificant. Because this foreign material should only exist during pre-operational conditions, this situation is normally judged to be a non-contributing factor in LLRT failure during outages at operating plants.
- **Piston Rotation:** Valve piston rotation was considered a potential contributor to the MSIV leakage problem since this phenomenon has been observed. Although not directly linked with through seat leakage, it could become a contributing factor because seating surfaces are not constant in relation to one another. This could produce erratic LLRT results since consistent seat contact may not be achieved. Continual rotation of a piston could cause wear between the piston and body guiding surfaces, which could affect clearances and operation. This condition has not been observed in the size MSIVs at Vermont Yankee. The evidence of this is a lack of wear rubbing on the piston or valve body upper bore. The OEM has confirmed that this condition is only prevalent in larger valves and is a direct result of how much of the piston nose is subjected to (within) steam flow.
- **Valve Orientation:** The MSIV stem travels in a 45-degree angle relative to the pipe centerline. This makes valve maintenance more difficult and increases the chance of damage to the valve internals. For two MSIVs (V2-80A and V2-80D), the stem is further rolled to the side by as much as 30 degrees. In this arrangement, the piston is not supported by a rib guide at the base of the piston; instead, it is cradled between two rib guides. This potentially increases the misalignment between the centerline of the piston and the centerline of the seat. This increases the required movement (sliding against friction) for the piston to seat properly.
- **Excessive Clearances/Seat to Guide Misalignment:** A designed and specified diametrical clearance exists between the piston and guides. When the valve is installed in the plant in a horizontal pipe run, the piston slides on the guides by

**CR-VTY-2004-0918**  
**“MSIV As-Found LLRTs Show An Adverse Trend”**  
**Adverse Trend Common Cause Analysis**

gravity. This effectively misaligns the piston to main seat by half the original diametrical clearance. This forces the main body seat to perform the final guiding of the piston into the seat. The piston hits the bottom part of the body seat first as it enters the seating area and then must slide along the seating surface toward the main seat centerline to make full contact with the body seat. In addition, previous seat maintenance, guide rib wear or damage may increase the distance the piston will have to travel when it enters the seat.

Since the direction of piston movement during seat engagement is significantly different from the direction of the actuator applied force during seat engagement, the net force moving the piston in this direction is reduced. Therefore, any opposing forces (i.e., friction) potentially could prevent the sliding movement from taking place. This type of valve movement contrasts with a valve in an angled line, where the actuator is vertical, rather than angled at 45° as in the BWRs. In an angled line, the actuator is vertical and drops the piston vertically, directly into the seat. No BWRs with Rockwell-Edwards MSIVs have this more-advantageous vertical actuator configuration. Modifications initiated by the manufacturer to compensate for this geometry have included changes to the guide ribs and additional welded steel “postage stamp” pads to guide the disk and reduce sliding friction into the seat.

In addition, seat to piston centerline misalignment can be related to leakage in the “as found” condition following plant cycle operation. The refurbishment of all MSIVs in 1998 and 1999 reduced the design diametrical clearance between the piston and bore from 0.030?-0.040? to 0.015?-0.018?. This along with complete line boring of the valves to achieve a maximum of 0.0025? total indicated runout (TIR) seat to guide rib concentricity provides assurance that best achievable alignment between seat and ribs is present. In 2001, the bore to seat TIR for V2-80D was found to be within 0.001? of the 1999 as-left values indicating that alignment is maintained and that there is no appreciable distortion induced by thermal cycling. Although the 80B/86B valves were not checked in 2001 for TIR bore to seat, the lapping setup in the valve body confirmed that there was no concentricity problem between the seat and bore; had there been, low spots would have been evident.

- **Lack of Concentricity:** Lack of adequate roundness of the mating seats and improper concentricity of the seats with the guide surfaces were considered possible contributors to seat leakage. Experience has shown that although the roundness may be acceptable, the seating surface on the piston may be eccentric relative to the piston outside diameter. This eccentricity, when combined with improper rib guidance or piston rotation, could be a significant contributor to low leakage LLRT failures.
- **Incorrect Seat Contact:** It is clear that for the MSIV to pass the LLRT, the mating seats must be in close contact. Any mechanism that might be identified as a possible means for preventing this contact could be a probable cause for LLRT

**CR-VTY-2004-0918**  
**“MSIV As-Found LLRTs Show An Adverse Trend”**  
**Adverse Trend Common Cause Analysis**

failure. As expected, experience has shown that an eccentric, excessive seating friction could prevent full closure and could cause piston cocking and excessive leakage. One means of creating this gap would involve misalignment between the centerline of the supporting guide ribs and seats, as well as possible cocking of the piston due to improper guidance related to clearances and excessive drag or friction forces. At Vermont Yankee the reduced diametrical clearances limit the contribution to LLRT failure to the minimum achievable. The OEM allows no less than 0.015" clearance due to thermal expansion and binding concerns.

- **Excessive Coefficient of Friction/Corrosion:** Excessive coefficient of friction due to oxidation or corrosion buildup on the guides and seating surfaces was considered a potential contributor to the MSIV leakage problem. This is because it has been demonstrated that some valves that fail LLRT can be brought within acceptable limits merely by cleaning these mating surfaces. It appears that there is no effective way to prevent corrosion, and therefore, it must be compensated for. Additionally, it has been shown that excessive friction may not be a problem in itself but may act in combination with several other factors. As the friction forces increase, the sliding of the piston to the main seat is impaired to the point that when the sliding motion ceases, the piston tilts, allowing the top of the piston to engage the upper valve bore before seating can be achieved. This locks the piston and restricts further movement. This may be a primary factor in LLRT leakage.

**CR-VTY-2004-0918**  
**"MSIV As-Found LLRTs Show An Adverse Trend"**  
**Adverse Trend Common Cause Analysis**

**ATTACHMENT 7**

The following table lists the causes identified for the MSIV as-found LLRT failures from 1996 through 2004.

YEAR	VALVE	LEAKAGE	VTY-CR-	CAUSE
1996	V2-86A	25.5	1996-627	Component Aging
1998	V2-80B	40.5	1998-476	Galled Stem; stuck
1998	V2-86B	32.5	1998-476	Main body seat non-concentricity; other dimensions out of spec
1998	V2-80C	407	1998-476	Valve body, seat defects
1998	V2-86C	93	1998-476	Main body seat non-concentricity; other dimensions out of spec
1998	B AND C MSL	CR-1998-476 also identified design deficiencies; poor workmanship in 1996; and the reverse testing of the inboard MSIV as causes. These are common to all 4 failed MSIVs in 1998.		
2001	V2-80D	75	2001-888	Foreign material on main seating surface; pilot leaked
2002	V2-80B	46	CR 2002-2211/2212 identified randomly deposited debris/corrosion products; and no procedure for disassembly, blue check, or reassembly of MSIVs	
2002	V2-86B	35		
2004	V2-86A	26	2004-836	Minor service induced degradation
2004	V2-80B	119	2004-841	Severe stem galling
2004	V2-86C	75	2004-839	Minor service induced degradation



# Vermont Yankee Nuclear Power Station Extended Power Uprate Feasibility Study

June 28, 2002

Prepared by:  
Brian R. Hobbs  
Michael E. Jacobs

DOCKET NO. 6812  
WILLIAM K. SHERMAN, WITNESS  
EXHIBIT DPS-WKS-10  
114 PAGES

Approval

A handwritten signature in black ink, appearing to read "Brian R. Hobbs", written over a horizontal line.

Project Manager  
Vermont Yankee

A handwritten signature in black ink, appearing to read "William K. Sherman", written over a horizontal line.

Project Manager  
ENTERGY Nuclear

# Vermont Yankee EPU Feasibility Study

## Table of Contents

<u>Section</u>	<u>Page</u>
LIST OF ACRONYMS	3
1. Executive Summary	4
2. Results	7
3. Financial Analysis	10
4. Implementation Strategy	11
REFERENCES	16
APPENDICES	
<input type="checkbox"/> Appendix A - Pinch Point Matrix and Summaries	
<input type="checkbox"/> Appendix B - Required Plant Modifications	
<input type="checkbox"/> Appendix C - 120% Uprate Power/Flow Map	
<input type="checkbox"/> Appendix D - EPU Project Level 1 Schedule	
<input type="checkbox"/> Appendix E - Project Description and Lessons Learned	

VY FEASIBILITY STUDY PINCH POINT MATRIX

Pinch Point Summary – Torus Water Temp/ECCS Pump NPSH

**Description**

The Appendix R safe shutdown is the most limiting analysis for peak torus temperature. Re-analysis using realistic, conservative assumptions, should result in assurance of adequate ECCS pump NPSH. If re-analysis does not assure adequate NPSH, an increase in RHRSW flow may be needed to limit pool temperature to the current limit.

**Pinch Point**

Modification pinch point occurs at 110%.

Estimated Cost

Materials

Contractor

Payroll

**Total:**

**Cost Basis:**

Cost is based on the GE EPU Feasibility Study Report.

Key Assumptions

Heat load is proportional to uprated power.

Analyses

Re-analysis of peak torus temperature. Re-analysis of Appendix R Safe Shutdown.

Modifications

If analysis fails, modify RHRSW pumps to obtain increased flow.

Benchmarking

DAEC used containment overpressure for LOCA re-analysis to ensure adequate NPSH.

**Confidence Factor**

**Need for Upgrade:** High Confidence: due to current torus temperature design limit.

**Proposed Resolution:** Medium Confidence: revised analysis of peak torus temperature will be sufficient to resolve this issue.

**Cost of Resolution:** Low Confidence: full scope of work not bounded.

**Cost-Risk Analysis:** Acceptable



**Memorandum of Understanding on**  
**Cooperation, Notification and Access Between**  
**Entergy Nuclear Vermont Yankee LLC**  
**and**  
**Vermont Department of Public Service**  
**for the Vermont Yankee Nuclear Power Station**

Dated July 30, 2002

**PURPOSE**

This document is a revision of the Memoranda of Understanding (MOU) on Notification previously existing between Vermont Yankee Nuclear Power Corporation (VYNPC) and Vermont Department of Public Service dated July 1991. This agreement provides a mechanism for the Department of Public Service (Department) to keep informed of important activities associated with the operation of Vermont Yankee Nuclear Power Station (VYNPS). This MOU is an agreement entered into by Entergy Nuclear Vermont Yankee LLC (Entergy Nuclear VY) and the Department for the purpose of enhancing a cooperative approach by both parties to allow them to perform their respective duties. Documents and information supplied pursuant to this MOU shall not be used for purposes of discovery or evidence in any proceeding with respect to VYNPS, or its owner or operator without the mutual consent of the parties.

This MOU is entered into as part of the transfer of VYNPC assets to Entergy Nuclear VY and shall become effective upon the closing of that transaction. This MOU may be amended or rescinded by mutual agreement of Entergy Nuclear VY and the Department. This MOU between Entergy Nuclear VY and the Department applies equally to Entergy Nuclear Operations (ENO) as operator of the VYNPS, or any other operating company that may be retained by ENVY. The term, "Vermont Yankee," used hereinafter shall be understood to mean appropriate personnel from ENVY or its operating company associated with the referenced item or activity for the VYNPS.

**AGREEMENT**

Vermont Yankee will provide notification of significant events and activities, and access to the VYNPS and to VYNPS related documents to the Department as described below. The following are in addition to all other notification requirements imposed by law or agreed to by Vermont Yankee.

The notification will be given to Department personnel designated (Department Designee) by the Commissioner of the Department. It will be the responsibility of the Department to keep Vermont Yankee informed of the names designated personnel and phone numbers to reach these individuals when not at the Department of Public Service offices.

**NRC Docket No. 50-271**  
**ASLBP No. 04-832-02-OLA**

**DPS Exhibit 34**  
**6 Pages**

The notification requirements and/or agreements of the Vermont Yankee Emergency Plan are in addition to, and do not supersede, the notifications delineated in this Agreement.

1. Daily Telephone Notification

Vermont Yankee will make a telephone notification to the Department Designee (or notification in person if the Department Designee is at the plant) in the AM of every business day (Monday through Friday except for holidays and normally scheduled days off at VYNPS and/or the State of Vermont. The call will be made even on those days when there is no significant event or activity to report. At a minimum, the notification will give the operational status of the plant. Whenever an item requiring notification as described in paragraphs a-c below, occurs before 4:00 p.m. during a business day but subsequent to the AM daily notification, Vermont Yankee will make an additional telephone notification to the Department Designee. Otherwise such notification will be made in the daily status call on the next business day, unless otherwise noted. The notification will include but not necessarily be limited to the following:

- a) Whenever federal requirements obligate Vermont Yankee to provide notification to the Nuclear Regulatory Commission (NRC) for VYNPS, the Department Designee will be provided with the same notification. This includes, but is not limited to, those notification requirements, or any successor notification requirements, specified in 10 CFR:

20.403 Notification of Incidents

50.36 Technical Specifications

20.405 Report of Overexposure and Excessive Levels and Concentrations

50.72 Immediate Notification Requirements for Operation Nuclear Power Reactors Any event reportable under 50.73 Licensee Event Report System

Vermont Yankee will notify the Department Designee of VYNPS one-hour and four-hour notifications made to the Nuclear Regulatory Commission. Outside normal working hours Vermont Yankee will make a reasonable effort to notify the Department Designee via off-duty phone numbers provided for that purpose.

Notwithstanding the foregoing, Vermont Yankee shall not give notification if the information to be revealed is prohibited from dissemination under the Atomic Energy Act or Regulations of the Nuclear Regulatory Commission.

- b) Leaks across a system boundary where radioactive material is present and that meets any one of the following criteria:
1. The leak has caused or has the likelihood of causing within 48 hours a reduction in plant power level; or

2. The leak requires action for the protection of plant personnel; or
  3. The leak results in measurable quantities of radioactivity being released to the environs by a path not otherwise allowed or recognized by the plant's operating license.
- c) Condition or event that causes or has reasonable likelihood of causing a significant unplanned reduction in the plant's power level or any unexpected plant shutdown.
  - d) The entry into any Limiting Condition for Operation described in VYNPS's Technical Specifications.
  - e) Event reports (ER's) that could result in either a plant power reduction or a shutdown, or identify a problem with any operable or in-service systems or components.
  - f) Deficiencies or weaknesses with VYNPS's Quality Assurance Program that (i) are reported to plant management and (ii) determined to require a corrective action or modification to bring the program into full compliance with NRC regulations or to otherwise prevent or mitigate an unsafe condition or practice.
  - g) Significant meetings regarding VYNPS, including, but not limited to, NSARC meetings, meetings with the NRC staff, and NRC inspection and audit exit meetings.

2. Daily Plant Status Report

A written (or electronic) Daily Plant Status Report will be provided to the Department Designee when requested by the Department. This report will provide a quantitative value of several key plant parameters from which a knowledgeable reader can determine the overall status of the operating plant. If requested, a Daily Plant Status Report will be provided for each day; however, the reports may be transmitted to the Department weekly.

This Daily Plant Status Report, which is primarily structured for plant management and employees, may be discontinued during periods of plant shutdown at the discretion of plant management.

3. Access to Documents

Access to VYNPS Documents will be provided to the Department Designee as identified below:

- a) The Department Designee will be provided access at the Department of Public Service Offices to current copies of the following reference documents, or any successor documents:

1. VYNPS Technical Specifications
  2. VYNPS Final Safety Analysis Report (FSAR)
  3. VYNPS Core Operating Limits Report
  4. Applicable VYNPS Quality Assurance Plan
  5. VYNPS Emergency Plan
  6. VYNPS Emergency Plan Implementing Procedures
  7. VYNPS "miniprints"
- b) The Department Designee will be provided access to documents related to the operation of VYNPS including, but not limited to, Licensing documents, Quality Assurance Audit Reports, 10 CFR 50.59 Reports, Reactor Core Performance Reports, Safety Meeting Reports, NSARC Reports, Plant Status Reports, PORC Reports, Personnel Exposure Reports, ALARA Reports, and Event Reports, and any successor documents.
- c) The Department Designee will also be provided access to performance indicator information developed for VYNPS including, but not limited to, maintenance request backlog, event report backlog, backlog of review and resolution of industry issues, overall staffing levels, and use of overtime, and similar successor information.
- d) This access does not extend to financial or personnel matters, INPO or other proprietary documents or draft documents. Access also does not extend to Safeguards Information unless the recipient has appropriate clearance.
- e) The Department Designee will be notified of, and provided access to, all documents provided to onsite NRC inspectors. The Department will be included on distribution for all documents related to the plant that are formally transmitted to the NRC Public Document Room.
- f) The Department Designee will be notified of, and provided access to, all computer data bases and other electronic information provided or made available to onsite NRC inspectors.
- g) Vermont Yankee will promptly provide the Department with a copy by facsimile of all press releases related to VYNPC. The Department will similarly provide Vermont Yankee all VYNPC-related press releases.
- h) At least monthly, but more frequently as needed to keep the Department informed of significant developments, the VYNPS Liaison Engineer, or comparable

position, will provide a briefing of ongoing licensing activities and provide a status of current and ongoing design changes.

4. Access to the Plant

- a) Access to VYNPS and onsite facilities will be provided to the Department Designee as requested by the Department, up to full-time, on-site presence of one or more designated individuals from the Department. Upon satisfactory compliance with VYNPS's requirements for plant access, including access control measures for security, radiological protection, personal safety and fitness for duty, the Department Designee will be granted unescorted access to the plant site. Notwithstanding being granted unescorted access, if requested by the Department Designee, the Department Designee will be escorted at reasonable times by the Liaison Engineer or other Vermont Yankee representative while making inspections at the plant or while meeting with other Vermont Yankee staff members; provided such request is made with reasonable advanced notice and does not significantly interfere with the Liaison Engineer's or representative's other duties. The Department Designee will be subject to and comply with such training, continuing security procedures and periodic medical testing which is applicable to all licensee employees as may be required to retain unrestricted facility access.

At the discretion of either the Department Designee or Vermont Yankee, the Department Designee will meet with Senior Plant Management for an entrance and exit meeting when on-site. These meetings will afford the Department Designee the opportunity to discuss his reason for the plant visit as well as any questions or concerns he may have at the conclusion of his visit.

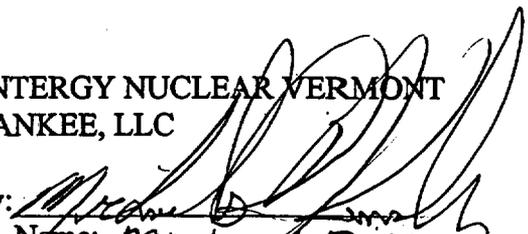
The Department Designee shall be notified of and allowed to attend NSARC meetings, PORC meetings, NRC exit meetings, and plant daily and outage status meetings, and any successor meetings. The Department Designee may attend other meetings at the plant that are of interest to the Department Designee with the approval of plant management. If plant management does not permit attendance at a meeting of interest to the Department Designee, the plant management shall state the specific reasons for withholding such approval.

- b) Suitable office space will be provided to the Department Designee at the site. The office space will include telephone and suitable office furniture. Additionally one locking file cabinet or equivalent storage will be made available. Plant visits will be coordinated with the Liaison Engineer:

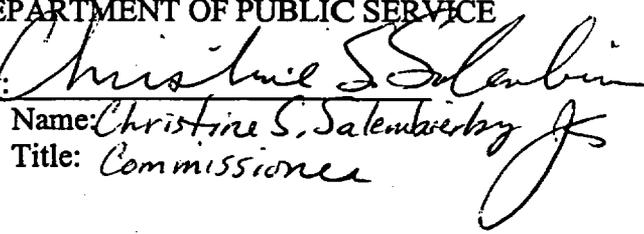
5. Vermont State Nuclear Advisory Panel (VSNAP)

Entergy Nuclear VY recognizes the duties and obligations of VSNAP and, upon request by the VSNAP Chairperson, will support VSNAP in the performance of its mandated duties.

ENTERGY NUCLEAR VERMONT  
YANKEE, LLC

By:   
Name: Michael R. Kanster  
Title: Sr. VP + COO

STATE OF VERMONT  
DEPARTMENT OF PUBLIC SERVICE

By:   
Name: Christine S. Salembier  
Title: Commissioner

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION 1  
476 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406

GUIDANCE FOR INTERIM IMPLEMENTATION OF NRC POLICY ON COOPERATION WITH STATES

State Observation of NRC Inspections

NRC Protocol:

- The RSLO will normally be the lead individual in the Region responsible for tracking requests for State observation, the assuring consistency regarding these requests, and for advising the Regional Administrator on the disposition of such requests.
- Requests for observations of Headquarters-based inspections should also be coordinated through the RSLO.
- NRC will process requests which are communicated in writing to the Regional Administrator through the State Liaison Officer. Requests should identify the type of inspection activity and facility the State wishes to observe.
- Limits on scope and duration of the observation period may be imposed if, in the view of the Regional Administrator, they comprise the efficiency or effectiveness of the inspection. Regions should use their discretion as to which, if any, inspections will be excluded from observations.
- States which are informed of unannounced inspections will also be informed they must not release information concerning the time and purpose of inspection.
- Region will make it clear to the licensee that the State views are not necessarily endorsed by NRC. Region will also make it clear that only NRC has regulatory authority for inspection findings and enforcement actions regarding radiological health and safety.

State Protocol:

- State will make advance arrangements with the licensee for site access training and badging (subject to fitness for duty requirements), prior to the actual inspection.
- Normally, only one individual will be allowed to observe the NRC inspection.
- State will be responsible for determining the technical and professional competence of any observer it proposes to accompany NRC inspectors.

NRC Docket No. 50-271  
ASLBP No. 04-832-02-OLA

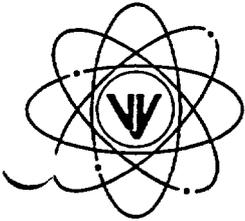
DPS Exhibit 35  
2 Pages

2.

- The State observer's communication with the licensee will only be through a designated NRC team member, usually the team leader or Senior Resident Inspector.
- When informed of an unannounced inspection, State must not release information concerning its time and purpose.
- The State observer will remain with escorts throughout the inspection.
- State observation may be terminated by the NRC team leader if, in the view of the team leader or Senior Resident Inspector, the observer's conduct interferes with a fair and orderly inspection.
- The State observer will not be provided with proprietary or safeguards information. Observers will not remove any material from the site without NRC or licensee approval.
- The State observer, in accompanying the NRC inspectors, does so at his or her own risk. NRC will not be responsible for injuries or exposures to harmful substances which may occur to the accompanying individual during the inspection and will assume no liability for any incidents associated with the accompaniment. Individuals accompanying NRC inspectors agree to waive all claims or liability against the Commission.
- The State observer will be expected to adhere to the same conduct as NRC inspectors during an inspection accompaniment.
- If the State observer notices any apparent non-conformance with safety or regulatory requirements during the inspection, he/she will make those observations promptly known to the NRC team leader. Likewise, when overall conclusions or views of the State observer are substantially different from those of the NRC inspectors, the State will advise the team leader and forward those views, in writing, to the NRC Region. This will allow NRC to take any necessary regulatory actions.
- State communications regarding these inspections should not be released to the public or the licensee before they are made known to the NRC and the inspection report is issued. State communications may be made publicly available, similar to NRC inspection reports, after they have been transmitted to and reviewed by NRC.

(Original Signed by William K. Sherman, January 11, 1990)

Signature of State Observer



**VERMONT YANKEE  
NUCLEAR POWER CORPORATION**

185 Old Ferry Road, Brattleboro, VT 05301-7002  
(802) 257-5271

STATE OF VERMONT  
REGULATORY BOARD  
NUCLEAR POWER

NOV 12 2 48 PM '98  
November 12, 1998  
BVY 98-147

RS

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Reference: (a) NRC Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and Containment Spray System After a Loss of Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment", dated July 14, 1998

Subject: **Vermont Yankee Nuclear Power Station  
License No. DPR-28 (Docket No. 50-271)  
Response to Generic Letter 98-04**

On July 14, 1998, the Staff issued Generic Letter 98-04 requiring that all licensees submit, within 120 days, a summary description of plant specific programs which provide assurance that protective coatings used inside containment are procured, applied, and maintained in compliance with applicable regulatory requirements and the plant specific licensing basis. The generic letter also requires the submittal of information demonstrating compliance with licensing basis requirements and the requirements of 10CFR50.46b(5) "Long Term Cooling," as they relate to tracking the amount of unqualified coatings inside containment. The generic letter also reviews past instances of foreign material in containment as well as design and maintenance deficiencies that could inhibit the emergency core cooling and containment spray systems from performing their safety functions. However, no additional actions or information are requested regarding these issues.

The attachment to this letter provides Vermont Yankee's response to the requested information.

We trust that this information is responsive to your concerns. If you have any questions on this transmittal, please contact Mr. Thomas B. Silko at (802) 258-4146.

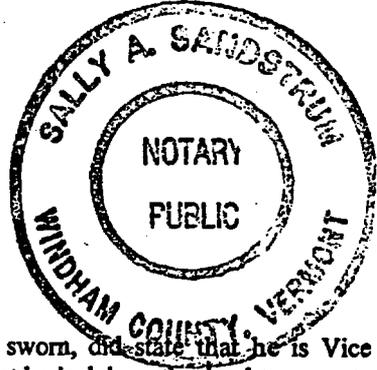
Sincerely,

VERMONT YANKEE NUCLEAR POWER CORPORATION

Don M. Leach  
Vice President, Engineering

NRC Docket No. 50-271  
ASLBP No. 04-832-02-OLA

DPS Exhibit 36  
6 Pages



STATE OF VERMONT            )  
  )ss  
WINDHAM COUNTY            )

Then personally appeared before me, Don M. Leach, who, being duly sworn, did state that he is Vice President, Engineering of Vermont Yankee Nuclear Power Corporation, that he is duly authorized to execute and file the foregoing document in the name and on the behalf of Vermont Yankee Nuclear Power Corporation, and that the statements therein are true to the best of his knowledge and belief.

Sally A. Sandstrum  
Sally A. Sandstrum, Notary Public  
My Commission Expires February 10, 1999

Attachment

- cc: USNRC Region 1 Administrator
- USNRC Resident Inspector – VYNPS
- USNRC Project Manager – VYNPS
- Vermont Department of Public Service

Docket No. 50-271  
BVY 98-147

**Attachment**

**Vermont Yankee Nuclear Power Station**

**Response to Generic Letter 98-04**

**November 1998**

in the standards and regulatory commitments referenced above. These coatings, including any substitute coating, have been evaluated to meet the applicable standards and regulatory requirements previously referenced. Also reference our recent letter to the Staff<sup>2</sup> in which we provided to the Staff information regarding procedures and processes to ensure that Torus coating (painting) removal and recoating, which was performed as part of the ECCS strainer modification, was performed in compliance with appropriate standards.

- (c) The surface preparation, application, and surveillance during installation of Service Level 1 coatings used for new applications or repair/replacement activities inside containment meet the applicable portions of the standards and regulatory commitments referenced above. Documentation of completion of these activities is performed consistent with the applicable requirements. Where the guidance of the standards and regulatory commitments did not address or were not applicable to repair/replacement activities, these activities were performed in a manner consistent with the generally accepted practices for coating repair/replacement. These practices are described in various ASTM standards and coating practice guidelines issued by industry organizations. Vermont Yankee recognizes that the NRC has not formally endorsed many of the more recent ASTM standards or industry guidelines, but nonetheless, they provide useful information which can be appropriately applied to provide assurance that repair/replacement activities on Service Level 1 coatings are effective in maintaining the acceptability of the coatings.

Vermont Yankee periodically conducts condition assessments of Service Level 1 coatings inside containment. Coating condition assessments are conducted each refueling outage as part of compliance with the Vermont Yankee Technical Specifications<sup>3</sup>. As localized areas of degraded coatings are identified, those areas are evaluated and, as required, repairs or replacements are implemented. The periodic condition assessments, and any resulting repair/replacement activities, assure that the amount of Service Level 1 coatings which may be susceptible to detachment from the substrate during a LOCA event are minimized. As previously noted, Vermont Yankee is evaluating the guidance contained in the EPRI coatings guideline.

**QUESTION 2(i) from GL 98-04:**

Information demonstrating compliance with Item (i) or Item (ii):

- (i) For plants with licensing-basis requirements for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety-related SSCs [systems, structures or components] during a postulated DB LOCA, the following information shall be provided to demonstrate compliance:
- (a) The date and findings of the last assessment of coatings, and the planned date of the next assessment of coatings.

<sup>2</sup> Reference VYNPC letter to USNRC, dated May 13, 1998, BVY 98-72, "Torus Coating Activities."

<sup>3</sup> A visual inspection is required as part of the implementation of Technical Specification surveillance 4.7.A.1 which states, in part, "A visual inspection of the suppression chamber interior including water line regions and the interior painted surfaces above the water line shall be made at each refueling outage."

- (b) The limit for the amount of unqualified coatings allowed in the containment and how this limit is determined. Discuss any conservatism in the method used to determine this limit.
- (c) If a commercial-grade dedication program is being used at your facility for dedicating commercial-grade coatings for Service Level 1 applications inside the containment, discuss how the program adequately qualifies such a coating for Service Level 1 service. Identify which standards or other guidance are currently being used to dedicate containment coatings at your facility.

**Response:**

Vermont Yankee does not have a licensing basis requirement for tracking the amount of unqualified coatings inside the containment and for assessing the impact of potential coating debris on the operation of safety related SSCs during a postulated DB LOCA.

**QUESTION 2(ii) from GL 98-04:**

Information demonstrating compliance with Item (i) or Item (ii):

- (ii) For plants without the above licensing-basis requirements, information shall be provided to demonstrate compliance with the requirements of 10CFR50.46b(5), 'Long-term cooling' and the functional capability of the safety-related CSS as set forth in your licensing basis. If a licensee can demonstrate this compliance without quantifying the amount of unqualified coatings, this is acceptable. The following information shall be provided:
  - (a) If commercial-grade coatings are being used at your facility for Service Level 1 applications, and such coatings are not dedicated or controlled under your Appendix B Quality Assurance Program, provide the regulatory and safety basis for not controlling these coatings in accordance with such a program. Additionally, explain why the facility's licensing basis does not require such a program.

**Response:**

In response to NRC Bulletin 96-03<sup>4</sup>, new large passive ECCS strainers have recently been installed at Vermont Yankee. Consequently, the following discussion addresses the anticipated licensing basis pending resolution of NRC Bulletin 96-03.

The unqualified coatings and the coatings in the steam/water jet zone of influence were conservatively included in the design of the new ECCS strainers. The amount of these coating materials is considered in combination with fibrous, particulate, and other miscellaneous debris, to assure that the analyzed functional capability of the ECCS is not compromised.

The new ECCS pump suction strainers have been designed to perform satisfactorily in the presence of 100% of the containment coatings which are installed in the LOCA pipe break steam/water jet zone of influence. This amount of coating debris is determined in accordance with the

<sup>4</sup> NRC Bulletin 96-03 "Potential Plugging of Emergency Core Cooling Suction Strainers by Debris in Boiling-Water Reactors," NRC Bulletin 96-03, dated May 6, 1996.

methodology documented in the BWR Owners' Group Utility Resolution Guidance document (NEDO-32686), Section 3.2.2.2.1.1. It is noted that this conservative methodology used to establish the amount of coating debris has been reviewed and accepted by the NRC<sup>5</sup>.

An additional amount of coating debris is added to the debris from the zone of influence. This amount accounts for potential debris which may result from coatings which are unqualified and/or degraded. Results of the BWR Owners' Group LOCA testing of coupons representing unqualified coating systems provide compelling evidence that failure of typical unqualified coating systems which pass a visual inspection is highly unlikely in the first 30 minutes of the LOCA. Only for the first 2 to 15 minutes of the LOCA event, depending on the break size, are suppression pool turbulence levels adequate to maintain coating debris in suspension in the pool where it would be available for accumulation on the ECCS strainers. Since the coating debris will quickly settle to the bottom of the suppression pool after the turbulence subsides, none of the coating debris (if eventually released sometime after the first 30 minutes of the LOCA) would be available to accumulate on the strainers. In sizing the replacement ECCS strainers for Vermont Yankee, no credit was taken for the delayed release of coating debris; therefore, these designs are conservative with respect to the limit on this coating debris source.

- (a) Vermont Yankee does not currently employ commercial grade dedication for Service Level 1 coatings used inside of primary containment.

In summary, the above adequately demonstrates compliance with 10CFR50.46(b)(5) and the functional capability of the subject ECCS equipment as set forth in the licensing basis for Vermont Yankee.

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<sup>5</sup> Reference "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to NRC Bulletin 96-03, Boiling Water Reactor Owners Group Topical Report NEDO-32686, 'Utility Resolution Guidance for ECCS Suction Strainer Blockage' (Docket No. PROJ0691)," dated August 20, 1998.

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IN THE UNITED STATES COURT OF APPEALS  
FOR THE FIRST CIRCUIT

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Nos. 04-1145 and 04-1359 (Consolidated)

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CITIZENS AWARENESS NETWORK, et al.

Petitioners.

U.S. NUCLEAR REGULATORY COMMISSION  
and the UNITED STATES OF AMERICA,

Respondents.

---

ON PETITION TO REVIEW AN ORDER OF THE  
U.S. NUCLEAR REGULATORY COMMISSION

---

BRIEF FOR THE FEDERAL RESPONDENTS

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THOMAS L. SANSONETTI  
Assistant Attorney General

GREER S. GOLDMAN  
LISA E. JONES  
Attorneys  
Appellate Section  
Environment and Natural  
Resources Division  
U.S. Department of Justice  
P.O. Box 23795  
Washington, D.C. 20026-3795  
(202) 514-0916

KAREN D. CYR  
General Counsel

JOHN F. CORDES, JR.  
Solicitor

E. LEO SLAGGIE  
Deputy Solicitor

SHELLY D. COLE  
Attorney

STEVEN F. CROCKETT  
Special Counsel  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
(301) 415-2871

July 14, 2004

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**NRC Docket No. 50-271**  
**ASLBP No. 04-832-02-OLA**

**DPS Exhibit 37**  
**91 Pages**

## TABLE OF CONTENTS

TABLE OF CONTENTS .....	i
TABLE OF AUTHORITIES .....	iii
JURISDICTIONAL STATEMENT .....	1
ISSUES PRESENTED .....	1
STATEMENT OF THE CASE .....	2
A. Nature of the Case .....	2
B. The Development of NRC Hearing Procedures Since 1954 .....	4
C. The Revised Part 2 .....	12
SUMMARY OF ARGUMENT .....	17
ARGUMENT .....	20
Standard of Review .....	20
I. The NRC Reasonably Construes Section 189a of the AEA Not to Require "On-the-Record" Hearings in NRC Licensing. ....	22
A. Section 189a on its face does not require "on-the-record" APA hearings. ....	22
B. The legislative history provides no support for petitioners' view. ....	23
C. Relevant case law supports the NRC's reading of section 189a. ....	27
D. No other statute requires that NRC hearings in reactor licensing be on the record. ....	34

E. Under <i>Chevron</i> this Court should defer to the NRC’s reasonable interpretation of section 189a. . . . .	39
II. The Challenged Portion of the Revised Part 2 Meets the Administrative Procedure Act’s Requirements For On-the-Record Hearings. . . . .	43
A. Subpart L permits parties to present evidence and to conduct cross-examination when necessary. . . . .	44
B. Subpart L requires mandatory disclosure of relevant documents. . . . .	48
C. Subpart L meets all other APA requirements. . . . .	50
III. The NRC Has Provided a Full Rationale For Revising Part 2. . . . .	51
IV. The Revised Part 2 Is Constitutional. . . . .	59
CONCLUSION . . . . .	64
CERTIFICATE OF COMPLIANCE REQUIRED BY FRAP 32(a)(7)(C) . . . . .	65
STATUTORY ADDENDUM . . . . .	SA-1
CERTIFICATE OF SERVICE	

## TABLE OF AUTHORITIES

### FEDERAL CASES

<i>American Federation of Government Employees v. FLRA</i> , 239 F.3d 66 (1 <sup>st</sup> Cir. 2001) .....	48
<i>American Public Gas v. FPC</i> , 498 F.2d 718 (D.C. Cir. 1974) .....	45
<i>Bellotti v. NRC</i> , 725 F.2d 1380 (D.C. Cir. 1983) .....	61, 62
<i>Berna v. Chater</i> , 101 F.3d 631 (10 <sup>th</sup> Cir. 1996) .....	44
<i>Blake v. Pellegrino</i> , 329 F.3d 43 (1 <sup>st</sup> Cir. 2003) .....	43
<i>Brigham v. Sun Life of Canada</i> , 317 F.3d 72 (1 <sup>st</sup> Cir. 2003) .....	48
<i>CAN v. NRC</i> , 59 F.3d 284 (1 <sup>st</sup> Cir. 1995) .....	20, 59
<i>Calvin v. Chater</i> , 73 F.3d 87 (6 <sup>th</sup> Cir. 1996) .....	45
<i>Central Maine Power v. FERC</i> , 252 F. 3d 34 (1 <sup>st</sup> Cir. 2001) .....	34
<i>Chemical Waste Management v. EPA</i> , 873 F.2d 1477 (D.C. Cir. 1989) .....	<i>passim</i>
<i>Chevron v. NRDC</i> , 467 U.S. 837 (1984) .....	<i>passim</i>
<i>City of West Chicago v. NRC</i> , 701 F.2d 632 (7 <sup>th</sup> Cir. 1983) .....	<i>passim</i>
<i>D.C. Federation of Civic Associations v. Volpe</i> , 434 F.2d 436 (D.C. Cir. 1970) .....	59, 60
<i>Dantran v. U.S. Department of Labor</i> , 246 F.3d 36 (1 <sup>st</sup> Cir. 2001) ...	33, 40, 42
<i>Daubert v. Merrell Dow Pharmaceuticals</i> , 509 U.S. 579 (1993) .....	57

<i>Elieen v. Ashcroft</i> , 364 F.3d 392 (1 <sup>st</sup> Cir. 2004) .....	21
<i>Frilette v. Kimberlin</i> , 508 F.2d 205 (3 <sup>rd</sup> Cir. 1974), cert. denied, 421 U.S. 980 (1975) .....	48
<i>Garcia v. United States</i> , 469 U.S. 70 (1984) .....	23
<i>Goncalves v. INS</i> , 6 F.3d 830 (1 <sup>st</sup> Cir. 1993) .....	21
<i>Kelley v. Selin</i> , 42 F.3d 1501 (6 <sup>th</sup> Cir. 1995) .....	<i>passim</i>
<i>Kelly and Prisk v. EPA</i> , 203 F.3d 519 (7 <sup>th</sup> Cir. 2000) .....	48
<i>Kerr-McGee Corp.</i> , 15 N.R.C. 232 (1982) .....	<i>passim</i>
<i>Loving v. U.S.</i> , 517 U.S. 748 (1996) .....	25
<i>Matthews v. Eldridge</i> , 424 U.S. 319 (1976) .....	62
<i>NLRB v. Valley Mold Co.</i> , 530 F.2d 693 (6 <sup>th</sup> Cir. 1975), cert. denied, 429 U.S. 824 (1976) .....	48
<i>National Whistleblower Center v. NRC</i> , 208 F.3d 256 (D.C. Cir. 2000) ..	19, 53
<i>Nuclear Information and Resource Service v. NRC</i> , 969 F.2d 1169 (D.C. Cir. 1992) .....	10, 55
<i>Oscar Mayer &amp; Co. v. Evans</i> , 441 U.S. 750 (1979) .....	25
<i>Penobscot Air Services v. FAA</i> , 164 F.3d 713 (1 <sup>st</sup> Cir. 1990) .....	34, 39
<i>Power Reactor Development Corp. v. International Union</i> , 367 U.S. 396 (1961) .....	25, 26
<i>Rust v. Sullivan</i> , 500 U.S. 173 (1991) .....	22
<i>Ryan v. Royal Insurance Co. of Amer.</i> , 916 F.2d 731 (1 <sup>st</sup> Cir. 1990) .....	43, 44

<i>San Antonio Independent School District v. Rodriguez</i> , 411 U.S.1 (1973) .....	60
<i>Seacoast Anti-Pollution League v. Costle</i> , 572 F.2d 872 (1 <sup>st</sup> Cir. 1978), <i>cert. denied</i> , 439 U.S. 824 (1978) .....	<i>passim</i>
<i>Sequoyah Fuels Corp. and General Atomics</i> , 40 N.R.C. 64 (1994) .....	61
<i>Siegel v. AEC</i> , 400 F.2d 778 (D.C. Cir. 1968) .....	<i>passim</i>
<i>Solis v. Schweiker</i> , 719 F.2d 301 (9 <sup>th</sup> Cir. 1983) .....	44
<i>U. S. v. Allegheny-Ludlum Steel Corp.</i> , 406 U.S. 742 (1972) .....	<i>passim</i>
<i>U.S. Florida East Coast Ry.</i> , 410 U.S. 224 (1973) .....	34
<i>U. S. v. Mead Corp.</i> , 533 U.S. 218 (2001) .....	21, 40
<i>U.S. v. Storer Broadcasting</i> , 351 U.S. 192 (1956) .....	38
<i>U.S. v. Tucker Truck</i> , 344 U.S. 33 (1952) .....	48
<i>Union of Concerned Scientists v. NRC</i> , 735 F.2d 1437 (D.C. Cir. 1984), <i>cert. denied</i> , 469 U.S. 1132 (1985) .....	31
<i>Union of Concerned Scientists v. NRC</i> , 920 F.2d 50 (D.C. Cir. 1990) ...	<i>passim</i>
<i>Vermont Yankee v. NRDC</i> , 435 U.S. 519 (1978) .....	41
<i>Walters v. Metropolitan Educational Enterprises</i> , 519 U.S. 202 (1997) .....	38

## FEDERAL STATUTES

### Equal Access to Justice Act

5 U.S.C. 504 .....	11
--------------------	----

### Administrative Procedure Act (APA)

5 U.S.C. 554, 556, 557 ..... *passim*

5 U.S.C. 558 ..... 34

5 U.S.C. 706 ..... 20

**Civil Justice Reform Act**

28 U.S.C. 471 ..... 52

**Hobbs Act**

28 U.S.C. 2342 ..... 1

**Federal Water Pollution Control Act (FWPCA)**

33 U.S.C. 1369 (FWPCA § 509) ..... 31, 35

**Service Contract Act**

41 U.S.C. 351 ..... 42

**Atomic Energy Act (AEA)**

42 U.S.C. 2021(l) (AEA § 274) ..... 47

42 U.S.C. 2201 (AEA § 161) ..... 5, 21

42 U.S.C. 2231 (AEA § 181) ..... 24, 25, 36

42 U.S.C. 2239(a) (AEA § 189a) ..... *passim*

42 U.S.C. 2239(b) (AEA § 189b) ..... 35

42 U.S.C. 2241 (AEA § 191) ..... *passim*

42 U.S.C. 2243 (AEA § 193) ..... 10, 36

**Nuclear Non-Proliferation Act (NNPA)**

42 U.S.C. 2155a (NNPA § 304) ..... 7, 38

**Nuclear Waste Policy Act (NWPA)**

42 U.S.C. 10154 (NWPA § 134) ..... 7

**Energy Reorganization Act of 1974**

42 U.S.C. 5843(b) ..... 4

42 U.S.C. 5844(b) ..... 4

**Federal Communications Act**

47 U.S.C. 309(b) ..... 39

**Energy Policy Act of 1992**

Pub. L. 102-486 (106 Stat.) (1992) ..... 10

**Price-Anderson Act**

Pub. L. 85-256 (72 Stat. 576) (1957) ..... 58

**Other Statutes**

28 U.S.C. 2112 ..... 2

Pub. L. 87-615 (76 Stat. 409) (1962) ..... 6, 7, 58

**Federal Rules of Civil Procedure**

Rule 26 ..... 15, 20, 49

**Federal Rules of Evidence**

Rule 611 ..... 47

**LEGISLATIVE MATERIALS**

H.R. Rep. No. 79-1980, 79th Cong., 2d Sess. (1945) ..... 57

100 *Congressional Record* 10000 (July 14, 1954) ..... 24

S. 3690, 83d Cong., 2d Sess., sec. 181 (1954) ..... 24

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in the Licensing of Reactor Facilities* (April 1957) ..... 38, 39

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Joint Committee on Atomic Energy, 87th Cong., 2d Sess. (1962)* ..... 5

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on Atomic Energy, 87th Cong., 1st Sess. (1981)* ..... 6

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**NRC REGULATIONS**

10 C.F.R. 2.310 ..... 15, 16

10 C.F.R. 2.313(b) ..... 50

10 C.F.R. 2.319 ..... 33, 50

10 C.F.R. 2.329(a) ..... 50

10 C.F.R. 2.336 ..... *passim*

10 C.F.R. 2.337 .....	33
10 C.F.R. 2.338 .....	50
10 C.F.R. 2.344 .....	33, 50
10 C.F.R. 2.347 .....	50
10 C.F.R. 2.348 .....	50
10 C.F.R. 2.700 .....	54
10 C.F.R. 2.704 .....	49
10 C.F.R. 2.705 .....	49
10 C.F.R. 2.1203 .....	49
10 C.F.R. 2.1204(b) .....	16, 19, 46
10 C.F.R. 2.1206 .....	16, 45
10 C.F.R. 2.1207 .....	16, 44, 45
10 C.F.R. 2.1208 .....	17, 44
10 C.F.R. 2.1209 .....	45
10 C.F.R. 2.1210(c) .....	33, 50
10 C.F.R. 2.1231 (1989) .....	10
10 C.F.R. 2.1235 .....	10
10 C.F.R. 2.1323(e) .....	11
10 C.F.R. 12.101 .....	11

10 C.F.R. 52.51 (1990) .....	9
10 C.F.R. Part 8 .....	55

**FEDERAL REGISTER NOTICES**

54 F.R. 8276 (1989) (10 C.F.R. Part 2 Subpart L) .....	9
54 F.R. 15386 (1989) (10 C.F.R. Part 52, Design Certification) .....	9
55 F.R. 29043 (1990) (10 C.F.R. Part 54, License Renewal Rule) .....	55
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63 F.R. 41872 (1998) (Statement of Policy on Conduct of Adjudicatory Proceedings) .....	12, 54
63 F.R. 66721 (1998) (10 C.F.R. Part 2 Subpart M) .....	11
64 F.R. 48942 (1999) (Closure of Local Public Document Rooms) .....	62
69 F.R. 2182 (2004) (Final 10 C.F.R. Part 2) .....	<i>passim</i>

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on the Administrative Procedure Act (1947) ..... 45, 56, 61

## JURISDICTIONAL STATEMENT

This case involves the Nuclear Regulatory Commission's *Final Rule: Changes to Adjudicatory Process*, 69 FR 2183 (2004). Various parties filed timely petitions for review, and motions to intervene, both in this Court and in the District of Columbia Circuit. Pursuant to 28 U.S.C. 2112 the cases ended up in this Court, where they were consolidated. Under the Hobbs Act, this Court has jurisdiction to review timely-filed challenges to NRC final rules. *See* 28 U.S.C. 2342.

### ISSUES PRESENTED

1. Whether the NRC reasonably construed its own enabling legislation -- which establishes a right to an agency "hearing" but does not specify the type of hearing -- to give the agency discretion to establish hearing procedures that allow a presiding officer to choose, subject to specified criteria, procedures appropriate to the case and issues presented.

2. Whether, assuming *arguendo* that the NRC's hearings must comply with the Administrative Procedure Act's (APA's) requirements for "on-the-record" hearings, the NRC's new hearing procedures that provide for judicial questioning of witnesses supplemented by party cross-examination if "necessary" for "development of an adequate record," and mandatory disclosure in lieu of traditional discovery, meet the APA's requirements.

3. Whether the NRC acted reasonably when it reformed its hearing procedure to avoid delay and expense.

4. Whether the NRC's new hearing procedures satisfy constitutional due process and equal protection requirements.

## **STATEMENT OF THE CASE**

### **A. Nature of the Case**

The NRC rule under challenge here -- codified at 10 C.F.R. Part 2 -- is the most recent manifestation of a fifty-year project, carried out by both the Commission and Congress, of tailoring the NRC's process for administrative hearings to the different kinds of questions presented in NRC adjudications. The Commission's predecessor agency, the Atomic Energy Commission (AEC), at one time thought section 189a of the Atomic Energy Act (AEA), 42 U.S.C. 2239(a), required trial-type "on-the-record" hearings as provided in the APA (5 U.S.C. 554, 556, 557). Indeed, the AEC's original rules not only met APA "on-the-record" requirements but also contained features that one might find in federal court civil litigation -- for example, full discovery (interrogatories, depositions, etc.) and nearly unfettered cross-examination of witnesses.

Gradually, both the Commission and the Congress perceived problems in this highly formalized approach -- it led to protracted, costly proceedings -- and

moved toward reform. Congress enacted a series of laws encouraging greater informality in NRC hearings. And, following a series of judicial decisions in the 1970s, the NRC revisited AEA section 189a, which requires simply “hearings,” not “on-the-record” hearings, and decided that the agency had sufficient flexibility to establish less formal processes. Beginning in 1982 the NRC took a series of steps introducing more informality in a few specified areas.

The new Part 2 applies a more informal hearing process across a wide range of matters. While retaining full-scale administrative “trials” for some cases, the new Part 2 generally replaces traditional discovery tools with mandatory disclosure obligations, limits cross-examination of witnesses, and gives administrative judges, rather than parties, chief responsibility for developing an adequate record for decision. In the preamble to the new Part 2, the NRC explained that the APA’s “on-the-record” requirements do not apply to NRC hearings. But the agency also explained that the new rule actually meets those requirements. 69 FR 2192.

In this Court, petitioners (and supporting intervenors and *amici curiae*) chiefly argue that the NRC has misconstrued section 189a, which (they say) does in fact require APA “on-the-record” hearings. Petitioners, however, mount no explicit challenge to the NRC’s position that its new rule actually meets APA

“on-the-record” requirements. Petitioners do offer desultory arguments that the NRC’s reform effort is unreasonable and unconstitutional. We outline below a quite different view of the NRC’s new rule.

### **B. The Development of NRC Hearing Procedures Since 1954**

*The role of hearings in NRC regulation.* The NRC was created by the Energy Reorganization Act (ERA) of 1974, Pub. L. 93-438 (88 Stat. 1233), to be the successor to the AEC’s regulatory arm, and to regulate civilian uses of nuclear power and radioactive material, specifically to protect public health and safety and the common defense and security. *See* Atomic Energy Act of 1954 (AEA), § 161b, 42 U.S.C. 2201(b). The NRC sets standards and reviews applications for licenses. The core of the agency is a technical staff that reviews license applications and enforces licensees’ compliance with the standards. The staff is authorized by statute to issue licenses. 42 U.S.C. 5843(b), 5844(b). By law, therefore, licensing is first and foremost a proceeding involving an applicant and the agency staff.

*Section 189a and the APA.* Section 189a of the AEA entitles interested parties to a “hearing” in ongoing proceedings “for the granting, suspending, revoking, or amending” of licenses, for the “transfer” of control, and “for the issuance or modification of rules and regulations.” 42 U.S.C. 2239(a). The

NRC's Atomic Safety and Licensing Board Panel (ASLBP) conducts adjudicatory hearings, and the Commission itself sits as an appellate body to review ASLBP decisions.

Under section 554 of the APA, hearings "required by statute to be determined on the record after opportunity for an agency hearing" are governed by sections 554, 556, and 557 of the APA. *See* 5 U.S.C. 554(a). Those provisions, in turn, establish a process for "on-the-record" hearings, including witness testimony, cross-examination and independent presiding officers. Section 189a of the AEA, however, does not state that NRC hearings are to be "on the record." It "nowhere describes the content of a hearing or prescribes the manner in which this 'hearing' is to be run." *Union of Concerned Scientists v. NRC*, 920 F.2d 50, 53 (D.C. Cir 1990).

*The AEC's early position.* Despite the absence of specific language in the AEA, AEC representatives initially took the position that section 189a required on-the-record hearings in licensing proceedings. *AEC Regulatory Problems: Hearings before the Subcommittee on Legislation, Joint Committee on Atomic Energy*, 87th Cong., 2d Sess. (1962) 60 (Letter of AEC Commissioner Loren K. Olsen). The AEC in fact conducted hearings even more formal than the APA required. AEC hearings typically permitted oral and written evidence and

routine cross-examination, as well as full discovery. The rules governing these proceedings were set forth in 10 C.F.R. Part 2, Subpart G (1962).

*Rulemaking 'hearings'*. The AEC also took the position that section 189a did *not* require on-the-record hearings in *rulemaking*, even though section 189a's "hearing" clause applies to rulemaking as well as licensing. The AEC's position on the required degree of formality in rulemaking was affirmed in *Siegel v. AEC*, 400 F.2d 778, 785-86 (D.C. Cir. 1968).

*Mandatory hearing requirement eliminated*. In 1962, Congress eliminated a requirement it had added in 1957 for mandatory hearings on applications for reactor operating licenses. Pub. L. 87-615 (76 Stat. 409), sec. 2. This law prompted a debate on whether section 189a required formal APA trial-type hearings. The AEC itself argued for formality; administrative law experts, including Professor Kenneth Davis, argued against. *See Radiation Safety and Regulation: Hearings before Joint Comm. on Atomic Energy*, 87th Cong., 1st Sess., 376, 386 (1981).

*Technically trained judges*. In the same 1962 legislation, Congress added to the AEA a new Section 191, which authorized the use of three-member Licensing Boards in which two of the members would "have such technical or other qualifications as the Commission deems appropriate to the issues to be

decided.” Pub. L. 87-615 (76 Stat. 409), sec. 1. This helped tailor hearings to the technical and scientific issues that arose in AEC hearings.

*Exports.* In 1978, Congress enacted the Nuclear Non-Proliferation Act (NNPA), which required, among other things, that the NRC establish procedures for “such public hearings [on nuclear export licenses] as the Commission deems appropriate.” NNPA section 304(b), 42 U.S.C. 2155a(b). The statute added: “[N]otwithstanding section 189a. of the 1954 Act, [the Commission’s procedures] shall not require the Commission to grant any person an on-the-record hearing in such a proceeding.” 42 U.S.C. 2155a(c). The Commission implemented this legislation in 10 C.F.R. Part 110.

*Expansion of spent fuel storage.* In 1982, in section 134 of the Nuclear Waste Policy Act, 42 U.S.C. 10154, Congress specified a set of “hybrid” procedures for hearings on applications to expand spent fuel storage capacity at reactor sites. These procedures authorized limited discovery, required parties to submit summaries of facts and arguments on which they proposed to rely at the hearing, limited issues that could be considered in such hearings, and limited judicial review of any “failure by the Commission to use a particular procedure.” The Commission promulgated 10 C.F.R. Part 2, Subpart K, to implement this legislation.

*Hearings in materials licensing.* During the 1970s the Supreme Court held that where Congress provides for “a hearing” in a rulemaking and does not specify that the hearing is to be “on-the-record,” a less formal hearing is sufficient, unless a definite congressional intention to the contrary is expressed in the statute’s legislative history. *United States v. Allegheny-Ludlum Steel Corp.*, 406 U.S. 742, 757 (1972).

Following this decision, the Commission again looked at the text and legislative history of the AEA and concluded that section 189a did not require “on-the-record” hearings. *See Kerr-McGee Corp.*, 15 NRC 232 (1982), JA25.

In *Kerr-McGee*, the Commission had conducted an informal hearing, using written submissions only, on an amendment to a “materials” license.<sup>1</sup> In explaining its approach, the Commission observed that the AEA did not specifically require on-the-record hearings, and it called the Act’s legislative history “unilluminating” as to what kind of hearing must be held under section 189a. *Id.* at 247, JA26.

In *City of West Chicago v. NRC*, 701 F.2d 632 (7th Cir. 1983), the Seventh Circuit upheld the Commission’s decision not to require formal hearings

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<sup>1</sup>A “materials” license permits the possession and use of regulated radioactive materials.

in “materials” cases. The court left open the question of nuclear power reactor licensing. *Id.* at 643. A few years later, the NRC issued 10 C.F.R. Part 2 Subpart L, which provided for informal “paper” hearings on all materials license applications and amendments. 54 FR 8276 (1989). This earlier version of Subpart L -- the one presently before this Court is different -- provided an opportunity for an oral hearing only in rare instances. It allowed no cross-examination and no discovery. *See* 10 C.F.R. 2.1235, 2.1231 (1989).

*Design certification.* In 1989, the NRC issued rules that allowed for the consideration of a specific reactor design in a rulemaking, rather than an adjudication. *See* 10 C.F.R. Part 52, 54 FR 15386 (1989). The NRC was aiming to foster standardization of nuclear power plant designs, as well as the early resolution of key safety issues. The new Part 52 provided, in pertinent part, that standard designs could be approved by rulemaking, before construction, with an opportunity for an informal hearing conducted by an NRC Licensing Board. This hearing was to be a “paper” hearing, unless the Commission gave the Licensing Board authority to conduct an oral hearing. 10 C.F.R. 52.51 (1990).

Part 52 was challenged in court, in part on the ground that it accomplished by rulemaking much that had been done theretofore only in licensing hearings. The new Part 52 was affirmed by the D.C. Circuit sitting *en banc*, in *Nuclear*

*Information and Resource Service v. NRC*, 969 F.2d 1169 (D.C. Cir. 1992). In *NIRS* the NRC argued that section 189a's hearing requirement for nuclear power plant licensing did not require APA-type "on-the-record" hearings, but the court reserved judgment on this argument. *Id.* at 1180.

**Hearings after construction of a standard design.** In 1992, Congress amended the AEA to codify some of the chief features of Part 52. Pub. L. 102-486 (106 Stat. 2776) (1992). The amendment provided, among other things, that "[t]he Commission, in its discretion, shall determine appropriate hearing procedures, whether informal or formal adjudicatory," for any hearing on whether a plant constructed using a standard design meets the criteria set forth in the license that permits the construction. *Id.*, codified at 42 U.S.C. 2239(a)(1)(B)(iv).

**Uranium enrichment facility licensing.** Earlier, in 1990, Congress added to the AEA a new section 193, 42 U.S.C. 2243, providing that, for the licensing of a uranium enrichment facility, the NRC "shall conduct a single adjudicatory hearing." The new section 193 expressly required that this single hearing be "on the record." This is the AEA's only explicit requirement for "on-the-record" hearings.

*Equal Access to Justice rules.* In 1994 the NRC issued rules implementing the Equal Access to Justice Act (EAJA), 5 U.S.C. 504. See 10 C.F.R. 12.101 *et seq.* EAJA authorizes the recovery of attorneys' fees by certain "prevailing" parties in "adversary adjudications," -- defined generally as APA-type "on-the-record" formal adjudications. See 10 C.F.R. 12.101. The NRC decided against authorizing payment of attorneys' fees in agency adjudications under section 189a. The NRC pointed out that it previously had "gone on record that it interprets section 189a ... as not requiring formal hearings." 59 FR 23119, 23120 (1994).

*Reactor license transfer.* Most recently, in 1998, the NRC promulgated Subpart M to Part 2 -- hearing rules covering transfers of licenses, including those for power reactors. Subpart M provided some, but not all, the features of "on-the-record" adjudications. For example, it did not provide for cross-examination. See 10 C.F.R. 2.1323(e). The Commission again cited its "position ... that section 189 does not require formal [APA] hearings." See 63 FR 66721, 66722 (1998).

### C. The Revised Part 2

The NRC's new Part 2<sup>2</sup> grew out of an effort in late 1998 by the agency's Office of the General Counsel (OGC) to re-examine the NRC's adjudicatory practices and to review the APA and the varied adjudicatory practices of other agencies and the federal courts, with a view to developing options for improving the NRC's hearing processes. JA1. OGC's effort was prompted by the Commission's long-standing and continuing priority of improving the efficiency and effectiveness of all its processes, not just hearings. Congress, too, had expressed an interest in hearing reform.<sup>3</sup>

OGC concluded that, except for hearings associated with the licensing of uranium enrichment facilities, the AEA did not mandate the use of "on-the-record" hearings within the meaning of the APA, and that the Commission enjoyed substantial latitude in devising hearing processes that would accommodate the rights of participants. JA1-10. In response to OGC's conclusions, the Commission directed OGC to develop a proposed rule. JA117.

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<sup>2</sup>The Federal Register notice containing the new Part 2 appears in the Addenda of the petitioners' briefs.

<sup>3</sup>See, e.g., H.R. Rep. No. 105-581, 105th Cong., 2d Sess., 135 (1998). In addition, the Commission had issued a Policy Statement urging its licensing boards to use available tools to act expeditiously. See 63 FR 41872 (1998).

In 1999, before drafting a proposal, OGC conducted public meetings with representatives of the industry, citizen groups, another Federal agency, academia, and the ASLBP. The discussions encompassed a full range of issues: standing, admission of contentions, discovery, cross-examination, summary disposition, hearing schedules and time limits, the role of the presiding officer, and the number of different hearing “tracks” that might be appropriate. JA121-378.

A proposed rule was issued on April 16, 2001. JA613. The notice of rulemaking asked a series of questions designed to elicit full public discussion of the issues, including, for example, the usefulness of cross-examination. JA622-24. The Commission received 1431 comments. Of these, only 22 were substantive, 15 of which opposed the revisions. Included in the 22 were all the comments submitted by the parties to this litigation. 69 FR 2190. After lengthy deliberations and responding to all significant comments, the Commission issued a revised final rule on January 14, 2004.

The preamble to the final rule explained the Commission’s commitment to improve the hearing process by making it more efficient:

Commission experience suggested that in most instances, the use of the full panoply of formal, trial-like adjudicatory procedures in subpart G is not essential to the development of an adequate hearing record; yet all

too frequently their use resulted in protracted, costly proceedings. The Commission adopted more informal procedures with the goals of reducing the burden of litigation costs, and enhancing the role of the presiding officer as a technical fact finder by giving him or her the primary responsibility for controlling the development of the hearing record beyond the initial submissions of the parties. .... Given the Commission's experience, and with the potential in the next few years for new proceedings to consider applications for new facilities, to renew reactor operating licenses, to reflect restructuring in the electric utility industry, and to license waste storage facilities, the Commission concluded it needs to reassess its hearing processes to identify improvements that will result in a better use of all participants' limited resources.

69 FR 2182. The new rule retained formal, trial-type hearings (10 C.F.R. Part 2 Subpart G) for some types of proceedings, but provided a less formal process (10 C.F.R. Part 2, Subpart L) for most proceedings.

The preamble to the new rule reiterated at some length the Commission's interpretation of section 189a of the AEA as not requiring APA-type "on-the-record" hearings. *See* 69 FR 2183-2186. The preamble also pointed out, however, that the new Part 2 "meets," or in the case of discovery, goes "well beyond," APA requirements. *Id.* at 2189, 2192. Turning to cross-examination, the preamble explained that "neither due process principles nor the APA require" it, and that in any case the new rule allows it, consistent with the APA, "to the extent necessary for a full and true disclosure of the facts." *Id.* at 2196, *citing* 5 U.S.C. 556(d).

The new Part 2 is more judge-centered than its predecessor in two important respects. First the presiding officer decides what level of formality -- or hearing "track" -- is appropriate. *See* 10 C.F.R. 2.310. Second, the presiding officer, more than the advocates, is ultimately responsible for the record, in a way more nearly corresponding to civil law proceedings than the adversarial proceedings of the common law. *See, e.g.,* 69 FR 2196.

The central part of the revised Part 2 is the new Subpart C, 10 C.F.R. 2.300 *et seq.* It contains the criteria governing the presiding officer's determination of the appropriate level of formality, or "hearing track," as well as procedural rules that apply generally to all tracks. Section 2.336 contains lengthy and detailed requirements for discovery. They mirror the requirements for mandatory disclosure in Federal Rules of Civil Procedure (FRCP) 26(a)(1)-(4). Subpart C also provides for possible use of more traditional discovery where mandatory disclosure fails. 10 C.F.R. 2.336(e).

The final rule retains the highly formal Subpart G -- with rights to full discovery and cross-examination, for example -- for use in, among other proceedings, reactor licensing cases where the presiding officer finds that "resolution of the contention or contested matter necessitates resolution of issues of material fact relating to the occurrence of a past activity, where the credibility

of an eyewitness may reasonably be expected to be at issue, and/or issues of motive or intent of the party or eyewitness material to the resolution of the contested matter.” 10 C.F.R. 2.310(d). Subpart G also applies to enforcement matters, unless all parties agree to a lesser degree of formality. 10 C.F.R. 2.310(b). Finally, Subpart G will be used in the licensing of uranium enrichment facilities and the national high-level waste disposal facility proposed for Yucca Mountain, Nevada. 10 C.F.R. 2.310(f).

In most other kinds of proceedings, a revised Subpart L, 10 C.F.R. 2.1200 *et seq.*, is the default track. 10 C.F.R. 2.310(a). It is more formal than the 1989 version of Subpart L. Subpart L now provides for an oral hearing unless all the parties agree otherwise. 10 C.F.R. 2.1206. Subpart L now also provides that the presiding officer may question witnesses using that officer’s own questions or questions proposed by the parties, 10 C.F.R. 2.1207(a)(3), and for cross-examination where “the presiding officer determines that cross-examination by the parties is necessary to ensure the development of an adequate record for decision.” 10 C.F.R. 2.1204(b).

## SUMMARY OF ARGUMENT

The NRC's new Part 2, which gives presiding officers the flexibility to select hearing procedures appropriate to the circumstances, subject to specified criteria, reasonably interprets section 189 of the AEA. As the Commission has said consistently for more than 20 years, the key first sentence of section 189a provides for NRC "hearings," but does not require "on-the-record" hearings, which would bring into play the requirements for formal adjudications under the APA. *See* 42 U.S.C. 2239(a)(1); 5 U.S.C. 554(a). Section 189a applies the same "hearing" requirement to all kinds of proceedings -- reactor proceedings as well as proceedings such as rulemaking that have long been less formal than APA "on-the-record" hearings -- but does not require that different kinds of hearings employ different levels of formality.

Neither does the legislative history of section 189a show that Congress intended reactor hearings to be "on the record." The Commission has several times examined this history and found it not helpful, and a reviewing court has agreed. *See City of West Chicago v. NRC*, 701 F.2d at 642. Indeed, if the history supports any position, it tends to support the Commission's.

The courts have consistently affirmed the agency's moves toward less formality in several kinds of proceedings, including rulemaking, materials

licensing, and certification of standard reactor designs. Petitioners argue that this Court should follow a 26-year-old decision, *Seacoast Anti-Pollution League v. Costle*, 572 F. 2d 872 (1st Cir. 1978), *cert. denied*, 439 U.S. 824 (1978), and should “presume” that section 189a intends “on-the-record” hearings in the absence of strong indications that Congress intended otherwise. However, the core of *Seacoast* is a simple concern that the record of administrative actions be adequate for judicial review. The new Part 2 provides a more than adequate record. Moreover, since the Supreme Court rulings in *U.S. v. Allegheny-Ludlum*, 406 U.S. 742 (1972), and *Chevron v. NRDC*, 467 U.S. 837 (1984), the courts of appeals have leaned toward the opposite presumption, one in favor of informality, and toward deferring to agencies’ judgments about what level of formality is appropriate in agency hearings.

In any case, the core of the new Part 2, Subpart L, meets, and in some respects exceeds, the APA’s “on-the-record” requirements. Petitioners make no explicit attempt to show otherwise. Viewed broadly, the new Subpart L gives parties ample opportunity to present oral and written evidence before an impartial judge who must give a reasoned decision based on the public record.

In particular, the new Subpart L permits such cross-examination as is “necessary to ensure development of an adequate record for decision.” 10

C.F.R. 2.1204(b). This is equivalent to the APA's provision for such cross-examination "as may be required for a full and true disclosure of the facts."

5 U.S.C. 556(d). Moreover, though the APA does not require traditional discovery, Subpart L mandates disclosure of relevant documents, and permits the usual discovery devices when parties fail to disclose. *See* 10 C.F.R. 2.336.

The NRC's latest revisions to its hearing rules are entirely reasonable, the fruit of long experience with resolving technical issues in hearings, and the most recent result of the agency's continuing efforts to make its processes more efficient and less expensive for all concerned. The agency's purposes and reasons are fully explained in the preamble to the final rule, and in an earlier policy statement that one court has ruled "fully explained the need for expedited case processing." *NWC v. NRC*, 208 F.3d 256, 263 (D.C. Cir. 2000).

These changes have been made incrementally, in consultation with interested parties, and with a full appreciation of the fact that public participation in agency decisions is a vital ingredient in the regulatory process. The changes reflect the Commission's long held view that section 189a gives the agency the flexibility to adapt its hearing procedures to the different kinds of questions encountered in different sorts of proceedings. They moreover reflect a shift in administrative law in general away from trials, especially for resolving technical

issues. They also reflect the efforts of federal district courts to reduce the costs of discovery by mandating disclosure of relevant documents. *See* FRCP 26(a)(1)-(4).

Contrary to CAN's view, there is no constitutional dimension to this case. The APA level of formality provided by Subpart L in no way deprives any interested party of due process. Moreover this Court has held, "safety and environmental concerns do not constitute liberty or property subject to due process protections." *CAN v. NRC*, 59 F.3d 284, 294 (1995). Neither does the new Part 2 discriminate against any group of participants. Its opportunities and burdens apply to both opponents and proponents of a licensing action.

## **ARGUMENT**

### **Standard of Review**

The fundamental issue before this Court is whether the revised Part 2 is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." *See* 5 U.S.C. 706(2)(A). "The scope of this review is narrow; a court should not substitute its judgment for that of the agency, and agency decisions will be upheld so long as they do not collide directly with substantive statutory commands and so long as procedural corners are squarely turned."

*CAN v. NRC*, 59 F.3d 284, 290 (1st Cir. 1995) (internal quotation marks and citations omitted).

To the extent this case involves review of NRC statutory interpretations of its organic statute, deference is due to "permissible" agency interpretations under the well-known two-step *Chevron* test. *Chevron U.S.A. Inc. v. NRDC*, 467 U.S. 837 (1984); *see also United States v. Mead Corp.*, 533 U.S. 218 (2001); *Elien v. Ashcroft*, 364 F.3d 392, 396-97 (1st Cir. 2004). That test looks first to Congress's clear commands, and gives effect to those. It then gives wide interpretive room to agencies charged with filling in statutory gaps, or construing ambiguities, in broad enabling legislation -- particularly where, as here, Congress has granted an agency broad rulemaking power. *See United States v. Mead Corp.*, 533 U.S. at 226-27; *see also* section 161 of the AEA, 42 U.S.C. 2201. By statute, the NRC enjoys a "unique degree [of] broad responsibility, free of close prescription in its charter as to how it shall proceed." *See Union of Concerned Scientists v. NRC*, 920 F.2d at 54 (internal quotation marks omitted). A "challenge to the NRC's procedural rules faces a steep uphill climb." *Id.* at 53. *See also Goncalves v. INS*, 6 F.3d 830, 832 (1st Cir. 1993).

Because petitioners are challenging Part 2 on its face, rather than as applied in a specific situation, they have a "heavy burden" to show that no set of

circumstances exists under which the rule would be valid. *See Rust v. Sullivan*, 500 U.S. 173, 183 (1991); *Union of Concerned Scientists*, 920 F.2d at 56.

**I. The NRC Reasonably Construes Section 189a of the AEA Not to Require “On-the-Record” Hearings in NRC Licensing.**

**A. Section 189a on its face does not require “on-the-record” APA hearings.**

Petitioners<sup>4</sup> make the interpretation of section 189a the centerpiece of their argument in favor of “on-the-record” hearings. But section 189a provides only for a “hearing.” It “nowhere describes the content of the hearing or prescribes the manner in which this ‘hearing’ is to be run.” *Union of Concerned Scientists*, 920 F.2d at 53. Moreover, it provides for hearings in all types of proceedings -- rulemakings and materials licenses included -- without distinguishing among them. In a series of cases, and in a number of contexts, courts have found that section 189a’s “hearing” requirement does not require “on-the-record” APA hearings.<sup>5</sup> The only issue so far undecided is reactor hearings, but it is not easy

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<sup>4</sup>We use the term “petitioners” to refer to all party-challengers to the NRC’s revised Part 2, petitioners and intervenors alike. They have filed multiple briefs. We refer to specific ones where appropriate.

<sup>5</sup>Courts have found that hearings on NRC materials licenses and spent fuel casks need not be “on the record.” *See Kelley v. Selin*, 42 F.3d 1501, 1510-12, 1513 (6th Cir. 1995); *City of West Chicago v. NRC*, 701 F.2d 632 (7th Cir. 1983). Neither do NRC rulemaking “hearings.” *See Siegel v. AEC*, 400 F.2d 778 (D.C. Cir. 1968). Petitioners do not appear to challenge these results.

to see why section 189a's identical "hearing" sentence should have a different meaning there.

Section 189a's unelaborated "hearing" provision gives the agency wide discretion to select the adjudicatory procedures it deems appropriate, and our Statement of the Case shows that the agency has used this discretion frequently. Petitioners are therefore driven to go beyond the plain language of section 189a and to seek support in other sources -- legislative history, case law, and statutory provisions other than 189a. None supports their view.

**B. The legislative history provides no support for petitioners' view.**

Petitioners agree that the legislative history of the 1954 enactment of the crucial first sentence of section 189a is slim. See Public Citizen Brief 20, NWC Brief 6. Nevertheless, they try to find something useful in it, by, for example, reading *one* Senator's comments in the Congressional Record as demonstration that Congress intended section 189a to require "on-the-record" hearings. See, e.g., CAN Brief 24-27. See *Garcia v. United States*, 469 U.S. 70, 76 (1984) (eschewing reliance on items of legislative history other than Committee Reports).

The Commission canvassed this material, along with later legislative material, in 1982 in *Kerr-McGee*, 15 NRC at 247-56. The Commission did not find it helpful, and neither did the Seventh Circuit when it reviewed the NRC's decision. See *West Chicago v. NRC*, 701 F.2d at 642. In *Kerr-McGee*, the Commission noted that, during congressional debates on the AEA, Senator Anderson had said, "I think a hearing should be required and a formal record should be made regarding all aspects." 100 *Cong. Rec.* 10,000 (July 14, 1954). He argued that, while the bill then under consideration, S. 3690, made the APA applicable to the AEC, as the current section 181 of the AEA does today, 42 U.S.C. 2231, the APA did not, by itself, require formal hearings. *Id.* CAN cites this as proof that Congress in 1954 intended that section 189a hearings be formal. Brief 25-26.

Actually, Senator Anderson's comment goes the other way. The proposed section 181 the Senator was criticizing provided that, "upon application, the Commission shall grant a hearing to any party materially interested in any agency action." S. 3690, 83d Cong., 2d Sess., sec. 181 (1954). In other words, the then proposed section 181 said roughly what the first sentence of section 189a said in 1954 and still says. Section 189a provides no more particulars about the

kind of hearing than did the section 181 criticized by Senator Anderson. See *Kerr-McGee*, 15 NRC at 247 n.14.

CAN misses this fact entirely. CAN notes that the enacted section 189a contains virtually the same language that the proposed section 181 contained about hearings, but CAN does not see that Senator Anderson had been *criticizing* section 181 for failing to require “on-the-record” hearings, and thus by extension, section 189a also. CAN Brief 25-26. Thus, the statements by Senator Anderson would tend to show that 189a does *not* require on-the-record hearings.

The legislative histories of later amendments to the AEA yield nothing conclusive. See *West Chicago*, 701 F.2d at 642. Generally speaking, appeal to post-enactment legislative history -- one Congress’s opinion of what an earlier Congress intended -- has its perils. It may be true that “[s]ubsequent *legislation* declaring the intent of an earlier statute is entitled to great weight in statutory construction,” *Loving v. U.S.*, 517 U.S. 748, 770 (1996) (emphasis added), but in *Oscar Mayer & Co. v. Evans*, 441 U.S. 750, 751 (1979), the Court brushed aside a conference committee report that, in dealing with amendments to a statute, offered its view of the proper interpretation of the original statute.<sup>6</sup>

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<sup>6</sup>Petitioners cite *Power Reactor Development Corp. v. International Union*, 367 U.S. 396 (1961) (*PRDC*), arguing that *PRDC* was willing to give “particular weight” to what the Joint Committee on Atomic Energy thought the AEA meant,

Public Citizen notes that in 1962 two of the Joint Committee's "consultants recommended legislation stating that 'the requirement of a hearing in section 189a ... shall not be deemed to require a determination on the record after opportunity for agency hearing, within the meaning of section [554] of the [APA].'" Brief 24-25, quoting *Kerr McGee Corp.*, 15 N.R.C. at 250. "Despite this recommendation," Public Citizen says, "Congress did not enact such legislation." Brief 25.

But this is too superficial an account. Consultants to the Committee had indeed recommended adding a provision that would specifically provide that informal procedures would satisfy section 189a. However, the Committee declined to do so because it found such a provision *unnecessary*. The Committee's report explained its reasoning:

To the extent that the legislative history of the 1957 amendments may not be clear, it is expressly stated here that the committee encourages the Commission to use informal procedures to the maximum extent permitted by the Administrative Procedure Act.

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and that *PRDC* saw "de facto acquiescence in and ratification of the Commission's licensing procedure by Congress." NWC Brief 29, citing *PRDC*, 367 U.S. at 408; Public Citizen Brief 24, quoting *PRDC*, 367 U.S. at 409. But *PRDC* was speaking not of *hearing* procedure but rather the AEC's practice of permitting construction of a reactor to begin before its design was complete and approved by the agency. *Id.* at 398.

In this connection, the committee refers to the recent report by the Subcommittee on Administrative Practice and Procedure of the Senate Judiciary Committee ...:

By now, it has become apparent that the adversary type of proceeding, resembling as it does the processes of the courts, does not lend itself to the proper, efficient, or speedy determination of issues with which the administrative agencies frequently must deal .... Questions relating to ... licensing of atomic reactors ... might better be solved in some type of proceeding other than an administrative "lawsuit" among numerous parties....

Having pointed out the desirability of informal procedures, *and the legal latitude afforded the Commission to follow such procedures*, the committee does not believe it necessary to incorporate specific language in the legislation requiring informal procedures.

H.R. Report. No. 87-1966, 87th Cong., 2d Sess., 6 (1962) (emphasis added).

*See also* S. Rep. No. 102-72, 102d Cong., 1st Sess., 296 (1991) ("NRC has long used formal adjudicatory procedures ... even though the Atomic Energy Act does not expressly require them").

Thus, contrary to petitioners' arguments, the legislative history does not speak uniformly to one side of the issue. If anything, it supports the NRC's understanding of section 189a.

**C. Relevant case law supports the NRC's reading of section 189a.**

The courts have offered at least three possible ways to approach silent or ambiguous statutory hearing provisions with no helpful legislative history. We

consider two of the approaches here, and the other in section I.E of our argument. One essentially assigns something like a “burden of proof.” The other, of which this Court’s decision in *Seacoast Anti-Pollution League v. Costle* is representative, considers institutional needs, in particular the needs of judicial review. Under either approach, the NRC’s revised Part 2 should be affirmed.

The first approach is represented by the Supreme Court case that prompted the NRC to reconsider whether its and the AEC’s hearing practices were required by section 189a. In *U.S. v. Allegheny-Ludlum Steel*, 406 U.S. at 757, a case involving railway freight rates established in rulemaking by the Interstate Commerce Commission, the Court ruled that ““only where the agency statute, in addition to providing a hearing, prescribes explicitly that it be “on the record,”” need sections 556 and 557 of the APA be applied. *Id.*, quoting *Siegel v. AEC*, 400 F.2d at 785.

The Court confined its holding to the exercise of “legislative rulemaking power rather than adjudicatory hearings.” *Id.* Since *Allegheny-Ludlum*, the circuits have disagreed about whether the same presumption -- that a hearing required by statute is assumed not to be “on the record” unless the statute includes the words “on the record” or their equivalent -- should be extended to agency adjudication.

The Seventh Circuit, in *West Chicago*, looking to legislative history and other statutes for signs of Congressional intent about section 189a, concluded that at least NRC “materials” licensing adjudications could be informal. The court noted that, “even in adjudication, the ‘on the record’ requirement is significant at least as an indication of congressional intent.” 701 F.2d at 644. “Despite the fact that licensing is adjudication under the APA, there is no evidence that Congress intended to require formal hearings for all Section 189(a) activities.” *Id.* at 645. The *West Chicago* court did not decide whether section 189a required “formal” hearings for reactor licensing. “Even *if* the legislative history indicates that formal procedures are required by statute in reactor licensing cases ..., we do not accept the ... argument that this by necessity indicates that all hearings ... must be formal as well.” *Id.* at 643 (emphasis added).

Public Citizen appears to read the “even if” as “even *though*.” Brief 29. This misreading may be prompted by Public Citizen’s insistence that *West Chicago* has no implications for reactor licensing. *Id.* But the court simply had no reason to reach the question of reactor hearings, and left it open. However, the Seventh Circuit’s logic, like the disputed first sentence of section 189a itself, did not distinguish between materials licensing and reactor licensing, and the Seventh Circuit never indicated that its holding could not be expanded to reactor

licensing. The court noted that the NRC had not said whether it was providing “formal” reactor hearings as a matter of discretion or statutory mandate. *West Chicago*, 701 F.2d at 642.

In a later NRC case, *Kelley v. Selin*, the Sixth Circuit declined to require a “formal adjudicatory hearing” for licensing a spent fuel storage facility. 42 F.3d at 1513. The court stressed that section 189a “provides for a ‘hearing,’ but does not provide for any particular format for this hearing.” *Id.*

In yet another case, involving the EPA, the D.C. Circuit upheld a procedure under which EPA had declined to provide an opportunity for oral presentation of evidence and cross-examination in certain adjudications. *Chemical Waste Management v. EPA*, 873 F.2d 1477 (D.C. Cir. 1989). The court said that while the words “on-the record” were not absolutely essential in order to find that formal adjudicatory hearings were required, there must be, in the absence of those words or similar language, evidence of “exceptional circumstances” demonstrating that Congress intended to require the use of formal adjudicatory procedures. *Id.*<sup>7</sup>

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<sup>7</sup>Although the *Chemical Waste* court suggested, in *dicta*, that section 189a of the AEA might be a case where “exceptional circumstances” dictated formal, on-the-record hearing requirements, that suggestion has its roots in a factually incorrect *dictum* in an earlier case that had said that, in 1961, “the AEC specifically requested Congress to relieve it of its burden of ‘on-the-record’

Petitioners, however, focus solely on this Court's decision in *Seacoast Anti-Pollution League v. Costle*, a case arising under the Federal Water Pollution Control Act (FWPCA) and involving an EPA permit granted to a nuclear utility to discharge heated water into the Hampton-Seabrook Estuary. In *Seacoast*, this Court found that, in EPA adjudication under the FWPCA, it was "willing to presume that unless a statute otherwise specifies, an adjudicatory hearing subject to judicial review must be on the record." 572 F.2d at 877. Public Citizen and some critics of *Seacoast* take this "presumption" to be an essential holding in the case. See, e.g., Public Citizen Brief 17; *Chemical Waste Management*, 873 F.2d at 1482 (noting that *Seacoast* was decided before *Chevron*); K. Davis and R. Pierce, *Administrative Law Treatise*, 3d ed. (1994), section 8.2, at 382.

However, there are other ways to read *Seacoast*. For example, the Seventh Circuit, in *West Chicago*, read *Seacoast* as "rel[ying] at least in part on the presence of the 'on the record' requirement in Section 509 [of the Federal Water Pollution Control Act,] [33 U.S.C. 1369]," 701 F.2d at 644, whereas

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adjudications under section 189(a)" and Congress did not do so. See *Union of Concerned Scientists v. NRC*, 735 F.2d 1437, at 1444 n.12, cert. denied, 469 U.S. 1132 (1985). As we have argued above in section I.B, the opposite is more nearly correct: The AEC argued in favor of formal procedures and the Joint Committee on Atomic Energy advised that informal procedures were permissible. See H.R. Rep. No. 87-1966, at 6, quoted in *Kerr McGee*, 15 NRC at 251.

“there is no indication even in the judicial review Section of the AEA [189b, 42 U.S.C. 2239(b)], ... that Congress intended to require formal hearings under the AEA.” *Id.*

More fundamentally, we read the *Seacoast* “presumption” as resting on a concern for judicial review, as clearly set forth in the Court’s opinion:

If determinations such as the one at issue here are not made on the record, then the fate of the Hampton-Seabrook Estuary could be decided on the basis of evidence that a court would never see or, what is worse, that a court could not be sure existed.

572 F.2d at 877. *Seacoast*, in short, was primarily concerned that agency procedure should provide a record adequate for judicial review. In fact, *Seacoast* can be understood (and limited) in light of the peculiar facts presented in that case. In *Seacoast*, the EPA granted the permit in part on the basis of evidence *not* in the record. *Id.* at 881.

But it does not require a *Seacoast*-style “on-the-record” presumption to ensure an adequate record for judicial review. As *Seacoast* itself appeared to recognize, 557 F.2d at 876 n.6, the fact of judicial review means that “the agency must be careful to provide some basis for appellate court review,” not necessarily a basis reached in an “on-the-record” hearing. For decades, courts have reviewed agency rulemaking records that would not necessarily meet the

“on the record” test.<sup>8</sup> Certainly, less formal adjudication can offer the same adequate basis for review.

Whatever the level of formality in a section 189a hearing, the NRC agrees that it must provide a record adequate for judicial review. It has always done so, as, for example, in the rulemaking (*Siegel v. AEC*) and materials licensing (*City of West Chicago v. NRC*) cases, where hearings are not “on the record.” The NRC’s revised Part 2 clearly requires an adequate hearing record for judicial review. *See* 10 C.F.R. 2.319, 2.337, 2.344, 2.1210(c). This meets *Seacoast*’s fundamental concern.

As far as we know, this Court has never again applied a *Seacoast*-style presumption in order to ensure adequate judicial review.<sup>9</sup> Indeed, this Court is understood by one scholar to have abandoned the presumption in a recent case, one in which, moreover, the Court granted the Federal Aviation Administration *Chevron* deference. *See* J. Pierce, Jr., *Administrative Law Treatise*, 4th ed.

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<sup>8</sup>The APA’s provisions on judicial review apply to all final agency actions (with some exceptions), whether on the record or not. Thus, the mere fact of judicial review does not entail “on-the-record” proceedings.

<sup>9</sup>*Dantran v. U.S. Dept. of Labor*, 246 F.3d 36 (1st Cir. 2001), *see, e.g.*, Public Citizen Brief 30-31, is not to the contrary. That case involved a debarment. The NRC’s revised Part 2 provides formal, trial-type hearings in enforcement cases.

(2002), section 8.2, at 538-39, citing *Penobscot Air Services v. FAA*, 164 F.3d 713 (1st Cir. 1999). See also *Central Maine Power v. FERC*, 252 F.3d 34, 46 (1st Cir. 2001) (term “hearing” “notoriously malleable”). *Seacoast* seems incompatible with the Supreme Court’s holding in *U.S. v. Florida East Coast Ry.*, 410 U.S. 224, 234 (1973), that a general statutory “hearing” requirement is not “equivalent” to a requirement for an “on-the-record” hearing.

**D. Other statutes do not require that hearings in reactor licensing be on the record.**

Finding little support in the plain language or history of section 189a itself, petitioners try to find the “on-the-record” requirement in other statutes. The attempt fails.

*APA Section 558(c)*. NWC asserts, “Section 558(c) requires that all administrative licensing proceedings governed by the APA provide the on-the-record procedures set forth in 5 U.S.C. §§ 556 and 557.” NWC Brief 20-21. However, in the case that petitioners make the centerpiece of their attack on Part 2, *Seacoast*, this Court rejected that very argument, and held that section 558(c) does *not* require “full adjudicatory hearings.” 572 F.2d at 878 n.11 (citations omitted). Accord *West Chicago*, 701 F.2d at 644. Section 558(c) requires “on-the-record” hearings only if they are already required by another law.

*AEA Section 181.* Petitioners also assert that section 181 of the AEA independently requires that hearings in NRC reactor licensing proceedings be on the record. CAN Brief 35; NWC Brief 21. Section 181 provides, in pertinent part, “The provisions of the Administrative Procedure Act ... shall apply to all agency action taken under this Act.” 42 U.S.C. 2231.

Petitioners miss the logic of section 181, which says that the APA applies to all NRC actions but says nothing about the “on-the-record” issue. The Seventh Circuit in *West Chicago* recognized that section 181 sheds no light on the “on-the-record” issue: “While Section 181 ... made the provisions of the APA applicable to all agency actions, .... it did not specify the ‘on the record’ requirement necessary to trigger Section 554 of the APA.” 701 F.2d at 642.

*AEA Section 189b.* Petitioners also assert that a provision in section 189b that makes final NRC actions judicially reviewable necessarily implies that hearings under section 189a must be on-the-record. *See* CAN Brief 37. *See also* *Amici* Brief 12 n.6. As we discussed above, however, “on-the-record” hearings are not indispensable to creating an adequate record for judicial review of NRC decisions. *See West Chicago*, 701 F.2d at 644; *see also Seacoast*, 572 F.2d at 876 n.6 (judicial review section of Federal Water Pollution Control Act, section

509(b), 33 U.S.C. 1369(b), does not, standing alone, trigger the “on-the-record” requirement).

*AEA Section 189a(1)(B)(iv)*. The *amici* argue that “Congress knows how to authorize the NRC to depart from formal APA adjudicatory requirements when it wishes” because in section 189a(1)(B)(iv) Congress explicitly gave the Commission authority to use “informal” procedures in any hearing held between construction and operation of a certified standard design. In other words, *amici* say, where Congress does not explicitly provide for less formal hearings -- such as in section 189a -- Congress intends that the hearings be more formal. Brief 20.

However, the very same form of argument may be applied to reach the opposite conclusion. Section 193(b)(1) of the AEA, 42 U.S.C. 2243(b)(1), explicitly says, “the Commission shall conduct a single adjudicatory hearing *on the record* with regard to the licensing of and construction and operation of a uranium enrichment facility under sections 53 and 63.” (Emphasis added). Based on this explicit reference to an “on-the-record” hearing, arguably, where Congress does not explicitly provide for *more* formal hearings, Congress intends that the hearings be *less* formal. In short, this form of argument cuts both ways and so is not useful in interpreting section 189a.

*AEA Section 191a.* Similarly unpersuasive are arguments that rely on an overly narrow interpretation of the word “notwithstanding” in AEA Section 191a. That provision says, in pertinent part,

“*Notwithstanding* the provisions of sections 556(b) and 557(b) of Title 5, the Commission is authorized to establish ... licensing boards, each comprised of three members, ... two of whom shall have such technical or other qualifications as the commission deems appropriate.”

(Emphasis added.) Public Citizen argues that “Congress would not have needed to begin Section 191a with the language ‘notwithstanding the provisions of section 556(b) and 557(b)’ unless APA hearing procedures were required under section 189a.” Brief 22.

The NRC has long taken the position that Congress likely included the “notwithstanding” clause “to eliminate ambiguity” and “to counter and eliminate potential legal objections to the use of informal hearing procedures.” See 15 NRC at 250 n.25 (1982); 69 FR 2184 (final rule). As the Commission’s *Kerr-McGee* decision noted, section 191a’s “notwithstanding” clause could have been a response to ambiguity created by the NRC’s use of formal procedures in practice, and an attempt to preempt the argument that, having chosen to use “on-

the-record” procedures, the agency was required to use them *in toto*. See 15 NRC at 250 n.25.<sup>10</sup>

Public Citizen asserts that “[t]he NRC’s argument ignores the principle that a court should avoid interpreting an act in a manner that would render one of its provisions meaningless.” Brief 22 (citations omitted). But that is not the NRC’s position. Petitioners ignore the principle that “the ‘mere’ elimination of evident ambiguity is ample -- indeed, admirable -- justification for the inclusion of a statutory phrase.” *Walters v. Metropolitan Educational Enterprises*, 519 U.S. 202, 209-10 (1997).

Thus, the other statutes cited by petitioners neither themselves require on-the-record hearings nor tell us how to read section 189a.<sup>11</sup>

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<sup>10</sup>The same is true about the use of “notwithstanding” in 42 U.S.C. 2155a: “Notwithstanding section 2239(a) of this title [section 189a of the AEA],” the Commission shall not “grant any person an on-the-record hearing in [a nuclear export] proceeding.”

<sup>11</sup>NWC cites legislative history that says that the Federal Communications Act (FCA) was one of the models for the AEA, and notes that the Supreme Court has held that hearings under the FCA are to be “on the record” even though the FCA does not use those words. NWC Brief 25-26, *citing* Joint Committee: *A Study of AEC Procedures and Organization in the Licensing of Reactor Facilities* (April 1957), at 20 (NWC Brief Addendum), and *U.S. v. Storer Broadcasting*, 351 U.S. 192, 202-03 (1956).

The analogy the Joint Committee report made, however, was not between the *hearing* provisions of the two acts. Rather, both acts provided for first authorizing construction and then licensing operation. *Study* at 20. There is little

E. Under *Chevron* this Court should defer to the NRC's reasonable interpretation of section 189a.

Any doubts about section 189a's meaning should be resolved in the NRC's favor. The Supreme Court's *Chevron* case establishes a two-part inquiry: "First ... is the question whether Congress has directly spoken to the precise question at issue.... [I]f the statute is silent or ambiguous with respect to the specific issue, the question for the court is whether the agency's answer is based on a permissible construction of the statute." *Chevron v. NRDC*, 467 U.S. at 843.<sup>12</sup>

Under *Chevron* step one, Section 189a is silent about the level of formality the

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analogy between section 189a and the hearing provision at issue in *Storer*. The latter applied just to cases in which the Federal Communications Commission (FCC) had denied a license application. In such cases, the FCA called for "a full hearing in which the applicant and all other parties in interest shall be permitted to participate but in which both the burden of proceeding with the introduction of evidence upon any issue specified by the Commission, as well as the burden of proof upon all such issues, shall be upon the applicant." 47 U.S.C. 309(b). The NRC's final rule provides even more formality in such cases. 10 C.F.R. Part 2 Subpart G. But the Joint Committee itself notes that the FCA requires more formality in cases of license denials than the AEA, in which "no distinction is made between procedures in granting and denying applications." *Study* at 21, citing 47 U.S.C. § 309(b) (FCA).

<sup>12</sup>Thus, where *Seacoast* dealt with silence or ambiguity by means of a presumption, *Chevron*, which was decided after *Seacoast*, accords deference to reasonable agency interpretations. This is another reason to believe that the remaining core of *Seacoast* is this Court's concern for the adequacy of the record. See *Penobscot Air*, 164 F.3d 713 (1st Cir. 1990) (not employing *Seacoast* presumption but giving FAA *Chevron* deference), discussed above in section I.C of the Argument.

required hearings should have. *See West Chicago*, 701 F.2d at 642. Therefore, the question before this Court (*Chevron* step two) is whether the NRC's reading of section 189a is permissible. For the reasons we have already given, it plainly is. The NRC has for years construed section 189a to permit the agency to adapt its hearing procedures to the kind of question being considered in a particular hearing.

Petitioners argue that the NRC should not be given *Chevron* deference. They argue that "the ordinary tools of statutory construction show that Congress intended that Section 189a require on-the-record hearings" (Public Citizen Brief 30), that "a statute that relates to matters outside the agency's area of expertise [is] entitled to no special deference" (*id.* at 30, citing *Dantran*, 246 F.3d at 48), and that "any deference that might have been due ... was lost when the Commission reversed its position" (Public Citizen Brief 31, citing *U.S. v. Mead*, 533 U.S. 218, 228 (2001)).

These arguments come to nothing. First, as we have just shown in section I.B, the ordinary tools of statutory construction do not in any way show that "Congress has directly spoken to the precise question at issue." In fact, three Circuits have found no such direct speaking. *See Kelley v. Selin*, 42 F.3d at

1511, 1513; *Union of Concerned Scientists v. NRC*, 920 F.2d at 53; *West Chicago*, 701 F.2d at 642.

Second, how to the conduct hearings under section 189a is very much a matter within the agency's expertise: Section 189a is part of the NRC's organic statute, and the agency has been conducting hearings on technical matters within the agency's expertise for decades. Due to the technical nature of such hearings, the NRC is specially positioned to understand what is necessary for effective hearings. Deference is "especially applicable when NRC is structuring its own rules of procedure and methods of inquiry." *Kelley v. Selin*, 42 F.3d at 1511, citing *Vermont Yankee v. NRDC*, 435 U.S. 519, 543 (1978). Accord *Union of Concerned Scientists v. NRC*, 920 F.2d at 54 (*increased* deference due NRC procedural rules because of unique degree to which broad responsibility is reposed in the Commission, free of close prescription in its charter) (emphasis in the original).

*Chemical Waste* provides a useful parallel to the present case. There, the D.C. Circuit gave *Chevron* deference to EPA's interpretation of a hearing provision in an environmental statute administered only by the EPA. See 873 F.2d at 1478-79, 1480-81. Likewise, the NRC administers the AEA's hearing provisions, and should receive deference to its interpretations. This Court's

*Dantran* decision, where deference was denied, is not to the contrary, for the statutes involved there were administered by several agencies. *See, e.g.*, the Service Contract Act of 1965, 41 U.S.C. 351, *et seq.* (applies to every contract entered into by the U.S. for an amount in excess of \$2500).

Third, as discussed above, the NRC has not suddenly "reversed" its position on what section 189a requires. Indeed, the Commission has been consistent in its interpretation of section 189a for over 20 years. Moreover, reversals of agency positions do not, by themselves, rule out *Chevron* deference. The *Chevron* case itself affirmed the EPA's reversal of a policy, indeed a double reversal in a short time. *See* 467 U.S. at 853-59.

Again, *Chemical Waste* provides a useful parallel. There petitioners had argued that EPA had abandoned a position that the hearing provision at issue had required formal hearings. The D.C. Circuit ruled that, "Even if EPA had taken that position, ... it would remain free to change its interpretation in order to permit the use of informal procedures ..., provided that its new interpretation is otherwise legally permissible and is adequately explained." 873 F.2d at 1480-81. We have shown that the NRC's long-standing reading of section 189a is legally permissible, and we later show that the NRC's revision of Part 2 is adequately explained.

## **II. The Challenged Portion of the Revised Part 2 Meets the Administrative Procedure Act's Requirements for On-the-Record Hearings.**

Even if section 189a of the AEA mandates “on-the-record” APA hearings in reactor licensing, this Court should uphold the new rule because the new Subpart L meets APA “on-the-record” requirements.

Petitioners devote nearly their entire briefs to arguing that NRC hearings must comply with the APA's requirements for “on-the-record” hearings, but they offer no explicit argument on the logically next question whether the revised Part 2 meets those requirements. Indeed, Public Citizen's and CAN's briefs never cite or quote a provision of the new Part 2. The Commission stated at least three times in the preamble to the final rule that its new Part 2 satisfied APA “on the record” standards. *See* 69 FR 2189, 2192, 2196.

“[I]ssues adverted to on appeal in a perfunctory manner,” or by “passing references,” are “deemed ... abandoned.” *Ryan v. Royal Ins. Co. of Amer.*, 916 F.2d 731, 734 (1st Cir. 1990). *See also Blake v. Pellegrino*, 329 F.3d 43, 50 (1st Cir. 2003). Abandoned issues may not be revived in reply briefs. *See*

*Ryan*, 916 F.2d at 734. Here, petitioners do not offer the kind of “developed argumentation” necessary to raise an issue on appeal. *See id.*<sup>13</sup>

The revised Part 2, in particular the new Subpart L,<sup>14</sup> satisfies the level of formality required in APA “on-the-record hearings.” We single out the two questions about which the petitioners are the most concerned: cross-examination and discovery. We also address other requirements of APA “on-the-record” hearings and show that the new Subpart L meets them.

**A. Subpart L permits parties to present evidence and to conduct cross-examination when necessary.**

Under the APA, “[a] party is entitled to present his case or defense by oral or documentary evidence [and] to submit rebuttal evidence.” 5 U.S.C. 556(d). The NRC’s new Subpart L provides for the submission of written testimony, responses, and rebuttal testimony, along with supporting affidavits. *See* 10 C.F.R. 2.1207, 2.1208. It also requires an oral hearing unless the parties

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<sup>13</sup>Petitioners’ silence on a fundamental question is fatal. *Berna v. Chater*, 101 F.3d 631, 633 (10th Cir. 1996) (if on appeal claimant challenges only one of two alternative rationales supporting a disposition, and unchallenged rationale is a sufficient basis for the disposition, claimant’s success is foreclosed).

<sup>14</sup>Petitioners’ briefs focus on the new Subpart L, the centerpiece of the revised Part 2. *See, e.g.*, Public Citizen Brief 12-13. The new Subpart L is expected to cover most NRC licensing hearings. *See* 69 FR 2213. Nothing in petitioners’ arguments challenges other subparts of the revised Part 2.

unanimously agree to a written hearing. *See* 10 C.F.R. 2.1206. Each party is entitled to present witnesses at the oral hearing and can submit proposed questions for the presiding officer to ask witnesses at the hearing. 10 C.F.R. 2.1207. The APA also gives parties the right to submit proposed findings and conclusions of law. 5 U.S.C. 557(c). So does the revised Subpart L. *See* 10 C.F.R. 2.1209.

Petitioners claim that the revised rule unlawfully “abolishes” cross-examination, or at least cross-examination of experts. Public Citizen Brief 3, 13. But the APA does not guarantee unlimited cross-examination. Instead, APA “on-the-record” hearings require only such cross examination “as may be required for a full and true disclosure of the facts.” 5 U.S.C. 556(d). This Court has held that this APA language affords no right to cross-examination, and that “[t]he party seeking to cross-examine bears the burden of showing that cross-examination is in fact necessary.” *Seacoast*, 572 F.2d at 880 n.16, *citing American Public Gas v. FPC*, 498 F.2d 718, 723 (D.C. Cir. 1974), and the Attorney General's Manual on the Administrative Procedure Act at 78 (1947). *See also Calvin v. Chater*, 73 F.3d 87, 91 (6th Cir. 1996), *citing Solis v. Schweiker*, 719 F.2d 301 (9th Cir. 1983).

The NRC's Subpart L, though using somewhat different language, provides as much access to cross-examination as the APA. Subpart L allows cross-examination where "necessary to ensure the development of an adequate record for decision." 10 C.F.R. 2.1204(b)(3). As the preamble to the final rule makes clear, the NRC intended that language to be the equivalent of the APA's. 69 FR 2188, 2191, 2195-96. The difference in language can be read simply as the NRC's elaboration on what in fact the APA standard means in actual adjudication.

Public Citizen claims that Part 2 "eliminates" any cross-examination of experts. Brief 3. This is untrue. Public Citizen cites a statement in the preamble to the final rule that the Commission believes cross-examination "does not appear to be either necessary or useful in circumstances where, for example, the dispute falls on the interpretation of or inferences arising from otherwise undisputed facts." Public Citizen's Brief 36-37, *citing* 69 FR 2196. But the Commission goes on to say that the presiding officer is best able to assess the record as the hearing progresses, and to determine whether cross-examination is needed to develop an adequate record. *Id.*

Having first claimed that the new Subpart L "abolishes" or "eliminates" cross-examination, incongruously petitioners then object to the Part 2

requirement that expressly directs parties to submit cross-examination plans. See, e.g., NWC Brief 16 n.4. But Part 2 requires no more than what a good advocate would prepare: the issues, the objective of the cross-examination, and a proposed line of questions. See 10 C.F.R. 2.104(b). Cross-examination plans are one means by which NRC judges can “exercise reasonable control over the mode ... of interrogating witnesses ... so as to make the interrogation ... effective for the ascertainment of the truth, ... avoid needless consumption of time, and ... protect witnesses.” Federal Rule of Evidence (FRE) 611(a). Several provisions of the APA give presiding officers authority to require reasonable case management measures such as cross-examination plans. See 5 U.S.C. 556(c)(3), (5), (6), and (11).

In its comments on the proposed rule, NWC had asserted, “There should be *no* limits, whatsoever, on cross-examination.” JA787. This is simply unrealistic, and hardly reflective of judicial practice (*see* FRE 611(a), quoted above). It assumes, as do many of petitioners’ objections to plans, limits, schedules, etc., that the parties and tribunals have unlimited time and resources.<sup>15</sup>

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<sup>15</sup>The *amici* also argue that subpart L’s provisions on cross-examination are inconsistent with section 2741 of the AEA, 42 U.S.C. 2021(l). Brief 22. That section says that, in certain Commission adjudicatory proceedings -- those which the Commission conducts in a State which exercises authority relinquished to the State by the NRC under section 274 -- the Commission must give the State a

**B. Subpart L requires mandatory disclosure of relevant documents.**

Petitioners' claims, most notably NWC's extravagant claim that Part 2 "abolishes" discovery, NWC Brief 16, reveal, once again, an inattention to the APA and to the NRC rule itself. It is well-established that the APA does not require any discovery. *Kelly and Prisk v. EPA*, 203 F.3d 519, 523 (7th Cir. 2000); *NLRB v. Valley Mold Co.*, 530 F.2d 693, 695 (6th Cir. 1975), *cert. denied*, 429 U.S. 824, (1976); *Frilette v. Kimberlin*, 508 F.2d 205, 208 (3d Cir. 1974), *cert. denied*, 421 U.S. 980 (1975). But the new Part 2 actually provides significant discovery. First and foremost, Subpart L, and Subpart G also, mandate disclosure of an immense amount of material, precisely the sort of material subject in the past to rounds of document requests and interrogatories -- "documents relevant to the issues in the proceeding." 10 C.F.R. 2.336.<sup>16</sup>

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"reasonable opportunity to interrogate witnesses." We have shown that Part 2 does in fact provide "reasonable opportunity to interrogate witnesses." This issue is being raised for the first time on appeal, and by the *amici*, who, moreover, did not participate in the rulemaking. The Court should therefore not even consider the issue. *See U.S. v. Tucker Truck*, 344 U.S. 33, 36-37 (1952); *Brigham v. Sun Life of Canada*, 317 F.3d 72, 82 (1st Cir. 2003); *American Federation of Government Employees, Local 3936, AFL-CIO, v. FLRA*, 239 F.3d 66, 69 n.1 (1st Cir. 2001).

<sup>16</sup>Thus, even though the new Subpart L is labeled "informal," it actually provides more formality than the APA's "on-the-record" provisions require. The "informal" misnomer reflects AEC and NRC terminology only, in which

Mandatory disclosure is the now decade-old practice in federal district courts, adopted to reduce the resources consumed in discovery. *See generally* Advisory Committee Notes on the 1993 amendments to FRCP 26. The Commission has simply tailored mandatory disclosure to the particular kinds of information that are likely to matter in NRC license proceedings. 69 FR 2194. In the final rule, the Commission explained that mandatory disclosure “has the potential to significantly reduce the delays and resources expended by all parties in discovery.” *Id.*<sup>17</sup>

Furthermore, Part 2 leaves room for traditional discovery. Subpart G clearly says that discovery is to be had by the usual devices. 10 C.F.R. 2.704, 2.705. Subpart L says that discovery is not available except as Subpart C provides, 2.1203(d), but C provides the usual discovery devices as one possible sanction for failure to comply with mandatory disclosure. In fact, such discovery is the only sanction available when continuing adjudication of an issue, because

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Subpart G has always been called “formal” and Subpart L “informal.”

<sup>17</sup>The *amici* claim that mandatory disclosure would not cover enforcement documents. Brief 22. However, in a proceeding on enforcement, or in any other proceeding where enforcement documents might be relevant, enforcement documents would be disclosed, unless the documents were privileged or otherwise withholdable. Moreover, Subpart G procedures apply in enforcement proceedings, and Subpart G provides the usual range of discovery devices. 10 C.F.R. 2.705.

the other sanctions are denial of the application, or dismissal of either the relevant contentions or the whole adjudication. 10 C.F.R. 2.336(e).

**C. Subpart L meets all other APA Requirements.**

Sub-part L also meets all other APA “on-the-record” requirements. For example, it requires a qualified and unbiased presiding officer, as the APA provides. Section 2.313(a) of Part 2 provides that an ASLB, appointed pursuant to Section 191 of the AEA, or an ALJ will preside over Subpart L hearings. The NRC’s regulations provide the presiding officer in NRC hearings with essentially the same powers the APA provides. *See* 10 C.F.R. 2.319, 2.329(a), 2.338; *cp.* 5 U.S.C. 556(c). Both the APA and Part 2 prohibit *ex parte* contacts (*see* 5 U.S.C. 557(d)(1) and 10 C.F.R. 2.347), require separation of the agency’s prosecutorial and decision-making functions (*see* 5 U.S.C. 554(d) and 10 C.F.R. 2.347 and 2.348),<sup>18</sup> and provide for disqualification of a presiding officer for bias or other cause (*see* 5 U.S.C. 556(b) and 10 C.F.R. 2.313(b)). Also, as the APA requires, an NRC adjudicatory decision is on the record and explained. *See* 5 U.S.C. 556 and 557(c), and 10 C.F.R. 2.344(b) and 2.1210(c).

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<sup>18</sup>Part 2 imposes separation of functions even in initial licensing and thus again exceeds the APA’s requirements.

In short, as the NRC found in its rulemaking, the new Subpart L meets or exceeds all APA "on-the-record" requirements.

### **III. The NRC Has Provided a Full Rationale For Revising Part 2.**

Petitioners make several arguments that the agency has acted arbitrarily and capriciously -- that the NRC has reversed a long-standing position (*e.g.*, Public Citizen Brief 31), given no rationale for that reversal (Public Citizen Brief 32), inconsistently applied the new position (Public Citizen Brief 35), reneged on an "historic bargain" (Public Citizen Brief 34, NWC Brief 35), and ignored the value of public participation through hearings, especially through the device of cross-examination (Public Citizen Brief 36).

These arguments all mischaracterize either the new rule, the history of the NRC's consideration of hearing procedures, or the reasons why the NRC has adopted the revisions at issue here.

*Expense and delay.* The NRC has given a reasonable explanation for its revision of Part 2 -- that is, a desire to reduce the expense and delay of more formal hearings. See 69 FR 2182 ("Commission experience suggested that in most instances, the use of the full panoply of formal, trial-like adjudicatory procedures in subpart G is not essential to the development of an adequate hearing record; yet all too frequently their use resulted in protracted, costly

proceedings.”) Almost from the beginning of the NRC's existence, neutral third parties expressed concern about the lengthy licensing process at the NRC, both the lengthy staff reviews and the long hearings. *See* S. Breyer, “*Vermont Yankee* and the Courts’ Role in the Nuclear Energy Controversy,” 91 *Harvard L. Rev.* 1833, 1838-40 (1978) (“it seems safe to conclude that licensing delays have in fact played a significant role in these decisions [not to order nuclear plants].”). Highly formal procedures consume substantial resources and can cause avoidable expense and delay. Indeed, Congress, in the Civil Justice Reform Act of 1990, Pub. L. 101-650 (104 Stat. 5090), Dec. 1, 1990, required the federal district courts to find ways to reduce that expense and delay. *See* 28 U.S.C. 471.

Looking for ways to simplify its procedures, the NRC has not ignored the value of public participation. Rather, as the preamble to Part 2 states (quoting from an historic Commission decision), “Public participation, the Commission said, ‘is a vital ingredient.’” 69 FR 2182. The NRC has asserted the universally acknowledged fact that trials can be too long and expensive. Public participation can and should be accommodated in NRC proceedings, but that can be done without an overly-formalized hearing process. “The NRC has expressed a clear and reasonable goal of expediting nuclear power plant proceedings, both to accommodate the large number of cases to be heard and to ensure fair processes

for applicants and would-be intervenors alike.” *National Whistleblower Center v. NRC*, 208 F.3d 256, 263 (D.C. Cir. 2000); *see also id.* at 264 (1998 NRC Statement of Policy [part of the basis of the new Part 2] “fully explained the need for expedited case processing”).<sup>19</sup>

*Shift in NRC position.* Contrary to petitioners’ view, there has been no radical change, no “total reversal” (Public Citizen Brief 14), no abandonment of 50 years of practice and understanding. The NRC’s recent revisions to Part 2 are only the most recent revisions in a long history of revisions that goes back to 1962, when Congress removed from section 189a the requirement for a mandatory hearing on an application for an operating license.

Considering just the changes the NRC has instituted, the changes reflect legal views the agency has maintained since 1982 and include less formal hearings on materials licenses, reactor design certifications, and reactor license transfers. The substantive revisions in the rule at issue here affect mainly discovery and cross-examination, traditional discovery being replaced largely by mandatory disclosure, and cross-examination being limited to those issues on

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<sup>19</sup>In view of the NRC’s long experience with hearings under section 189a, and the widely recognized cost of traditional discovery and other highly formal procedures, it is not necessary for the NRC to conduct a special study, as urged by the Petitioners. *See, e.g.*, Public Citizen Brief 33.

which the presiding officer determines that an adequate record cannot be developed without cross-examination. But the NRC rule continues to require greater formality for any cases where the presiding officer determines that it is necessary to resolve “issues of material fact relating to the occurrence of a past activity, where the credibility of an eyewitness may reasonably be expected to be at issue, and/or issues of motive or intent.” *See* 10 C.F.R. 2.700.<sup>20</sup>

Throughout this long history, the NRC has moved deliberately and in full consultation with interested parties. The agency’s latest reconsideration of its adjudicatory procedures began over 5 years ago, with the issuance of a Statement of Policy on the Conduct of Adjudicatory Proceedings, 63 FR 41872 (Aug. 5, 1998), and OGC’s review of hearing procedures. JA1. The rulemaking that followed went beyond the usual notice and comment process (*see* 69 FR 2186) and made available to the public a large number of internal memoranda that discussed all sides of the issues.

The NRC’s changes to its hearing process are well within the mainstream of administrative law and are based on changes in the understanding of the law

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<sup>20</sup>To the extent the NRC has changed position, it may do so as long as it explains the change. *See, e.g., Chevron*, 467 U.S. at 863-64.

that date back almost 30 years.<sup>21</sup> The presumption against a high degree of formality in rulemaking, first enunciated by the Supreme Court in *Allegheny-Ludlum* in 1972, is now extended in many Circuits to adjudications. See R. Pierce, *Administrative Law Treatise*, 4th ed. (2002), section 8.2, at 538-39 (“a veritable flood of similar opinions”). Prompted by the Supreme Court's reasoning, the NRC has maintained since at least its 1982 decision in *Kerr-McGee*, 15 NRC 232, that section 189a does not require on-the-record hearings, let alone hearings with the formality required by Subpart G.<sup>22</sup>

**Cross-examination.** Petitioners claim that the NRC has unreasonably restricted cross-examination. See, e.g., Public Citizen Brief 36-39. But the

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<sup>21</sup>See R. Levy and S. Shapiro, “Administrative Procedure and the Decline of the Trial,” 51 *U. Kan. L. Rev.* 473 (May 2003); G. Edles, “An APA-Default Presumption for Administrative Hearings: Some Thoughts on ‘Ossifying’ the Adjudication Process,” 55 *Admin. L. Rev.* 787 (Fall 2003). Informal adjudication has been the “lifeblood” of the administrative process. R. Levy and S. Shapiro, “... the Decline of the Trial,” 51 *U. Kan. L. Rev.* at 496.

<sup>22</sup>As petitioners have pointed out, see, e.g., NWC Brief 28, in 1989 the NRC's then General Counsel stated a contrary view in a memorandum advising the NRC staff (not the Commission) during rulemaking on reactor license renewal. The memorandum was not a formal interpretation of the kind collected in 10 C.F.R. Part 8, and his advice ultimately was not adopted by the agency, for when the proposed rules were issued, the Commission retained Subpart G hearings “as is customary.” 55 FR 29043, 29052 (1990). Moreover, the same NRC General Counsel three years later signed the NRC brief in *NIRS v. NRC*, 969 F.2d 1169 (D.C. Cir. 1992), where the agency argued that section 189a gave the NRC flexibility to depart from APA “on-the-record” requirements.

NRC concluded that cross-examination has at best only limited uses in resolving expert scientific and technical issues. The Attorney General's Manual on the APA appears to recognize that cross-examination in technical contexts is not always useful. Discussing rulemaking, the Manual says that, "where the subject matter and evidence are broadly economic or statistical and the parties or witnesses numerous, the direct or rebuttal evidence may be of such a nature that cross-examination adds nothing substantial to the record and unnecessarily prolongs the hearings." Manual at 78, *quoting* H.R. Rep. 79-1980, 79th Cong., 2d Sess. (1945), at 37.

Similarly, "in rate making and licensing proceedings, which frequently involve extensive technical or statistical data, the agency may require that the mass of such material be submitted in orderly exhibit form. .... Typically, in these cases, the veracity and demeanor of witnesses are not important." *Id.*<sup>23</sup> See also K. Davis and R. Pierce, *Administrative Law Treatise*, 3d ed. (1994), section 8.2, at 383 (technical facts at issue in *Seacoast* should not have been the subject of cross-examination); *Chemical Waste*, 873 F.2d at 1482, *quoting* EPA,

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<sup>23</sup>More generally, three scholars of administrative law have said, "in many sophisticated and well-regarded legal systems other than that with which Americans are directly familiar, judicial proceedings are often unmarked by even an approximation of cross-examination." W. Gellhorn, C. Byse, and P. Strauss, *Administrative Law: Comments and Cases*, 7th ed. (1979), at 679.

53 FR 11257 (EPA saw “‘little need to establish witness veracity or credibility through observation of a witness’s demeanor on cross-examination’”).

Public Citizen cites the Supreme Court’s opinion in *Daubert v. Merrell Dow Pharmaceuticals*, 509 U.S. 579, 596 (1993), for the proposition that cross-examination is a safeguard against questionable scientific evidence. However, the Court certainly did not rule on the comparative value of cross-examination of experts versus the NRC’s scientist-judges’ examination of experts. The Court merely responded to the claim that the Court’s rejection of “general acceptance” as the standard for admission of scientific testimony might open the courtroom door to much junk science. Moreover, as we have noted, Subpart L provides for cross-examination where necessary.

By retaining subpart G for certain proceedings (not just enforcement), and requiring mandatory disclosure, the NRC’s revised Part 2 goes beyond what the law requires. Petitioners, however, see an inconsistency here, particularly in the agency’s retaining of Subpart G formality for the upcoming proceeding on the proposed high-level waste repository at Yucca Mountain, Nevada. *See, e.g.*, Public Citizen Brief 35. But, as the Commission indicated, there can be no doubt that the Yucca Mountain proceeding is likely to be the most complex and politically charged proceeding in the NRC’s history, and it is the only licensing

proceeding for which a Subpart G hearing has been promised for many years.

*See* 69 FR 2204.

*“Historic bargain.”* We conclude our defense of the reasonableness of the new Part 2 with consideration of petitioners’ oddest argument -- that the agency is renegeing on an “historic bargain,” in which, in 1957, the liability of the industry was limited in return for trial-type hearings. *See, e.g.,* Public Citizen Brief 34. Such history simply does not accord with the facts.

To begin with, the hearing requirement in section 189a was made law in 1954, a full three years before the liability of the industry was limited by the Price-Anderson Act. *See* Pub. L. 85-256 (72 Stat. 576) (1957), sec. 4. The only hearing provision enacted that same year was the provision for *mandatory* hearings in reactor license proceedings. *See id.*, sec. 7. But even here, if there was any “bargain” between backers of a limit on liability and backers of mandatory reactor license hearings, the bargain was done away with a mere 5 years later, when Congress removed the provision for mandatory hearings on operating licenses. *See* Pub. L. 87-615 (76 Stat. 409) (1962), sec. 2. Nothing in the legislative record supports petitioners’ “bargain” argument.

#### IV. The Revised Part 2 Is Constitutional.

Only CAN argues that Part 2 is unconstitutional, under both the First and the Fifth Amendments. CAN made a similar argument in 1995, in *CAN v. NRC*, 59 F.3d 284 (1st Cir. 1995), resting on claims of “takings” and a lack of due process. This Court rejected both claims, as being “overbroad, vague, and unaccompanied by factual support or analysis.” *Id.* at 294. This Court also cited *West Chicago* for the proposition that “generalized health, safety and environmental concerns do not constitute liberty or property subject to due process protections.” *Id.*, citing *West Chicago*, 701 F.2d at 645.

The same reasons call for rejecting CAN’s present constitutional claims. CAN tries to revitalize the due process claim and adds a novel claim that opponents of nuclear power plants form a “discrete and insular minority who are, without rights to full, fair, ‘on the record’ hearings, almost voiceless.” CAN Brief 22. CAN then suggests that the Part 2 revisions violate nuclear opponents’ First Amendment “right to participate in their government.” *See, e.g.*, CAN Brief 14. These arguments appear to be based largely on misreadings of the revised Part 2, and on an inapposite D.C. Circuit case.

The D.C. Circuit case, *D.C. Federation of Civic Associations v. Volpe*, 434 F.2d 436 (1970), is entirely off the point. In *D.C. Federation*, the Court

required the Department of Transportation to conduct hearings before beginning construction of a proposed bridge across the Potomac River. The court found that the Department had discriminated against citizens of the District of Columbia because the Department had deprived them of “the right to participate in the determination of highway projects,” while it granted citizens of all the States the same right. *See* 434 F.2d at 439-44.

CAN tries to analogize *D.C. Federation* to our case, but the analogy fails. To begin with, the Department appears not to have provided an opportunity for a hearing at all, but Part 2 clearly does. Also, of the three judges on the panel that decided the case, only one saw a constitutional dimension to it. *See* 434 F.2d at 448, 461. In addition, it is not clear from the case that the required hearing in fact had to be on the record.

In any event, Part 2 simply does not discriminate against opponents of nuclear power, who in any case do not constitute the kind of “discrete and insular minority” that concerned the court in *D.C. Federation*. *See also San Antonio Independent School District v. Rodriguez*, 411 U.S. 1, 28 (1973) (large, diverse, amorphous class with political power and without a history of purposeful unequal treatment is not a “discrete and insular minority”) No right afforded a

license applicant or licensee by Part 2 is not also provided intervenors, no limit on participation by an intervenor not also imposed on an applicant or licensee.

In pursuing its claim of discrimination, CAN claims that the public may not participate in enforcement proceedings. CAN Brief 18, *citing* to unidentified portions of the agency's section-by-section analysis of the final rule and *citing also Bellotti v. NRC*, 725 F.2d 1380 (D.C. Cir. 1983). The claim that the public may not participate in enforcement hearings misreads *Bellotti* and is unrelated to the revisions of Part 2. In *Bellotti*, the Court ruled that third parties could not automatically participate in an NRC enforcement proceeding to seek stricter enforcement action than the Commission itself was seeking, but they could participate if the Commission was proposing to *remove* a restriction upon the licensee. *Id.* at 1383. Also, in NRC practice, third parties can seek to intervene to *support* an NRC enforcement order. *See, e.g., Sequoyah Fuels Corp. and General Atomics*, 40 NRC 64, 69-70 (1994).

Moreover, the formality Part 2 provides in enforcement proceedings is entirely consistent with applicable law. Administrative law from the beginning has recognized the special character of proceedings in which license denial, suspension, or revocation are at stake. *See, e.g., Attorney General's Manual on*

the APA at 41; *see also* the survey of the adjudicatory practices of agencies other than the NRC, JA10.<sup>24</sup>

Moreover, insofar as CAN makes a procedural due process claim, it makes no attempt to support the claim by reference to the three criteria the Supreme Court has set forth for use in evaluating such claims. CAN does not address the "three distinct factors: First, the private interest that will be affected by the official action; second, the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and finally, the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *See Matthews v. Eldridge*, 424 U.S. 319, 335 (1976). Had CAN addressed these factors, it could not have

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<sup>24</sup>CAN also argues that the NRC's reliance on its computerized record system, the Agencywide Documents Access and Management System (ADAMS), to which the public has access through the NRC's Web site, unconstitutionally discriminates against people who live in poor communities near nuclear facilities, because they used to have access to NRC Public Document Rooms (LPDRs), but these are now closed. CAN Brief 28-29. The agency's decision to close the LPDRs and rely on ADAMS for public access was made 5 years ago, in a rulemaking in which CAN did not participate. *See* 64 FR 48942 (Sept. 9, 1999). ADAMS provides a larger public with a wider range of documents, more quickly, and at less expense. *Id.* at 48942-43. Moreover, in 1999, of the 86 facilities that then housed the LPDRs, all but six provided access to the Internet. *Id.* at 48942.

shown that Subpart L, together with the use of the more formal Subpart G procedures in some cases, did not provide adequate procedural safeguards.

In sum, there is no constitutional dimension to this case.

CONCLUSION

For the foregoing reasons, the petitions for review should be denied.

Respectfully submitted,

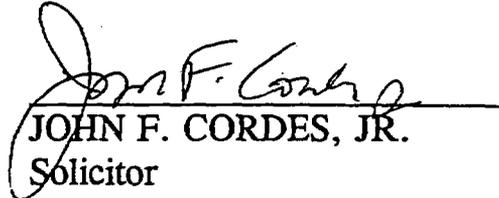
THOMAS L. SANSONETTI  
Assistant Attorney General

KAREN D. CYR  
General Counsel



GREER S. GOLDMAN  
LISA E. JONES

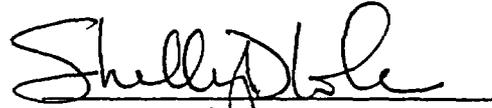
Attorneys  
Appellate Section  
Environment and Natural  
Resources Division  
U.S. Department of Justice  
P.O. Box 23795  
Washington, D.C. 20026-3795



JOHN F. CORDES, JR.  
Solicitor



E. LEO SLAGGIE  
Deputy Solicitor



Shelly D. Cole  
Attorney



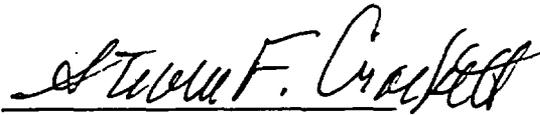
STEVEN F. CROCKETT  
Special Counsel  
Office of the General Counsel  
U.S. Nuclear Regulatory  
Commission  
Washington, D.C. 20555  
(301) 415-2871

Dated: July 14, 2004

CERTIFICATE OF COMPLIANCE REQUIRED BY FRAP 32(a)(7)(C)

I hereby certify that the Brief for Federal Respondents complies with the type-volume limitation in FRAP 32(a)(7)(B). The number of words in the Brief, excluding Table of Contents, Table of Authorities, Statutory Addendum, and Certificates of Counsel, is 14,000, as counted by the Corel WordPerfect 8 program.

Respectfully submitted,



Steven F. Crockett  
Special Counsel  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission

July 14, 1004

## STATUTORY ADDENDUM - CONTENTS

### *Administrative Procedure Act*

Sec. 554 [5 U.S.C. 554]. Adjudications .....	.SA-2
Sec. 556 [5 U.S.C. 556]. Hearings; Presiding Employees; Powers and Duties; Burden of Proof; Evidence; Record as Basis of Decision .....	.SA-3
Sec. 557 [5 U.S.C. 557]. Initial Decisions; Conclusiveness; Review by Agency; Submissions by Parties; Contents of Decisions; Record. ....	SA-5
Sec. 558 [5 U.S.C. 558]. Imposition of Sanctions; Determination of Applications For Licenses; Suspension, Revocation, and Expiration of Licenses .....	.SA-7

### *Atomic Energy Act*

Sec. 181 [42 U.S.C. 2231]. General. ....	SA-8
Sec. 189 [42 U.S.C. 2239]. Hearings and Judicial Review. ....	SA-8
Sec. 191 [42 U.S.C. 2241]. Atomic Safety and Licensing Board. ....	SA-10
Sec. 193 [42 U.S.C. 2243]. Licensing of Uranium Enrichment Facilities. ....	SA-11

### *Nuclear Waste Policy Act*

Sec. 134 [42 U.S.C. 10154]. Licensing of Facility Expansions and Transshipments .....	.SA-11
---	--------

### *Nuclear Non-proliferation Act*

Sec. 304 [42 U.S.C. 2155a]. Export Licensing Procedures. ....	SA-13
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## ADMINISTRATIVE PROCEDURE ACT

### Sec. 554 [5 U.S.C. 554]. Adjudications.

(a) This section applies, according to the provisions thereof, in every case of adjudication required by statute to be determined on the record after opportunity for an agency hearing, except to the extent that there is involved—

- (1) a matter subject to a subsequent trial of the law and the facts de novo in a court;
- (2) the selection or tenure of an employee, except an administrative law judge appointed under section 3105 of this title;
- (3) proceedings in which decisions rest solely on inspections, tests, or elections;
- (4) the conduct of military or foreign affairs functions;
- (5) cases in which an agency is acting as an agent for a court; or
- (6) the certification of worker representatives.

(b) Persons entitled to notice of an agency hearing shall be timely informed of—

- (1) the time, place, and nature of the hearing;
- (2) the legal authority and jurisdiction under which the hearing is to be held; and
- (3) the matters of fact and law asserted.

When private persons are the moving parties, other parties to the proceeding shall give prompt notice of issues controverted in fact or law; and in other instances agencies may by rule require responsive pleading. In fixing the time and place for hearings, due regard shall be had for the convenience and necessity of the parties or their representatives.

(c) The agency shall give all interested parties opportunity for—

- (1) the submission and consideration of facts, arguments, offers of settlement, or proposals of adjustment when time, the nature of the proceeding, and the public interest permit; and
- (2) to the extent that the parties are unable so to determine a controversy by consent, hearing and decision on notice and in accordance with sections 556 and 557 of this title.

(d) The employee who presides at the reception of evidence pursuant to section 556 of this title shall make the recommended decision or initial decision required by section 557 of this title, unless he becomes unavailable to the agency.

Except to the extent required for the disposition of ex parte matters as authorized by law, such an employee may not—

(1) consult a person or party on a fact in issue, unless on notice and opportunity for all parties to participate; or

(2) be responsible to or subject to the supervision or direction of an employee or agent engaged in the performance of investigative or prosecuting functions for an agency.

An employee or agent engaged in the performance of investigative or prosecuting functions for an agency in a case may not, in that or a factually related case, participate or advise in the decision, recommended decision, or agency review pursuant to section 557 of this title, except as witness or counsel in public proceedings. This subsection does not apply—

(A) in determining applications for initial licenses;

(B) to proceedings involving the validity or application of rates, facilities, or practices of public utilities or carriers; or

(C) to the agency or a member or members of the body comprising the agency.

(e) The agency, with like effect as in the case of other orders, and in its sound discretion, may issue a declaratory order to terminate a controversy or remove uncertainty.

**Sec. 556 [5 U.S.C. 556]. Hearings; Presiding Employees; Powers and Duties; Burden of Proof; Evidence; Record as Basis of Decision.**

(a) This section applies, according to the provisions thereof, to hearings required by section 553 or 554 of this title to be conducted in accordance with this section.

(b) There shall preside at the taking of evidence—

(1) the agency;

(2) one or more members of the body which comprises the agency;

or

(3) one or more administrative law judges appointed under section 3105 of this title.

This subchapter does not supersede the conduct of specified classes of proceedings, in whole or in part, by or before boards or other employees specially provided for by or designated under statute. The functions of presiding employees and of employees participating in decisions in accordance with section 557 of this title shall be conducted in an impartial manner. A presiding or

participating employee may at any time disqualify himself. On the filing in good faith of a timely and sufficient affidavit of personal bias or other disqualification of a presiding or participating employee, the agency shall determine the matter as a part of the record and decision in the case.

(c) Subject to published rules of the agency and within its powers, employees presiding at hearings may—

- (1) administer oaths and affirmations;
- (2) issue subpoenas authorized by law;
- (3) rule on offers of proof and receive relevant evidence;
- (4) take depositions or have depositions taken when the ends of justice would be served;
- (5) regulate the course of the hearing;
- (6) hold conferences for the settlement or simplification of the issues by consent of the parties; or by the use of alternative means of dispute resolution as provided in subchapter IV of this chapter;
- (7) inform the parties as to the availability of one or more alternative means of dispute resolution, and encourage use of such methods;
- (8) require the attendance at any conference held pursuant to paragraph  
(6) of at least one representative of each party who has authority to negotiate concerning resolution of issues in controversy.
- (9) dispose of procedural requests or similar matters;
- (10) make or recommend decisions in accordance with section 557 of this title; and
- (11) take other action authorized by agency rule consistent with this subchapter.

(d) Except as otherwise provided by statute, the proponents of a rule or order has the burden of proof. Any oral or documentary evidence may be received, but the agency as a matter of policy shall provide for the exclusion of irrelevant, immaterial, or unduly repetitious evidence. A sanction may not be imposed or rule or order issued except on consideration of the whole record or those parts thereof cited by a party and supported by and in accordance with the reliable, probative, and substantial evidence. The agency may, to the extent consistent with the interests of justice and the policy of the underlying statutes administered by the agency, consider a violation of section 557(d) of this title sufficient grounds for a decision adverse to a party who has knowingly committed such violation or knowingly caused such violation to occur. A party is

entitled to present his case or defense by oral or documentary evidence, to submit rebuttal evidence, and to conduct such cross-examination as may be required for a full and true disclosure of the facts. In rule making or determining claims for money or benefits or applications for initial licenses an agency may, when a party will not be prejudiced thereby, adopt procedures for the submission of all or part of the evidence in written form.

(e) The transcript of testimony and exhibits, together with all papers and requests filed in the proceedings, constitutes the exclusive record for decision in accordance with section 557 of this title and, on payment of lawfully prescribed costs, shall be made available to the parties. When an agency decision rests on official notice of a material fact not appearing in the evidence in the record, a party is entitled, on timely request, to an opportunity to show the contrary.

**Sec. 557 [5 U.S.C. 557]. Initial Decisions; Conclusiveness; Review by Agency; Submissions by Parties; Contents of Decisions; Record.**

(a) This section applies, according to the provisions thereof, when a hearing is required to be conducted in accordance with section 556 of this title.

(b) When the agency did not preside at the reception of the evidence, the presiding employee or, in cases not subject to section 554(d) of this title, an employee qualified to preside at hearings pursuant to section 556 of this title, shall initially decide the case unless the agency requires, either in specific cases or by general rule, the entire record to be certified to it for decision. When the presiding employee makes an initial decision, that decision then becomes the decision of the agency without further proceedings unless there is an appeal to, or review on motion of, the agency within time provided by rule. On appeal from or review of the initial decision, the agency has all the powers which it would have in making the initial decision except as it may limit the issues on notice or by rule. When the agency makes the decision without having presided at the reception of the evidence, the presiding employee or an employee qualified to preside at hearings pursuant to section 556 of this title shall first recommend a decision, except that in rule making or determining applications for initial licenses—

(1) instead thereof the agency may issue a tentative decision or one of its responsible employees may recommend a decision; or

(2) this procedure may be omitted in a case in which the agency finds on the record that due and timely execution of its functions imperatively and unavoidably so requires.

(c) Before a recommended, initial, or tentative decision, or a decision on agency review of the decision of subordinate employees, the parties are entitled to a reasonable opportunity to submit for the consideration of the employees participating in the decisions-

(1) proposed findings and conclusions; or

(2) exceptions to the decisions or recommended decisions of subordinate employees or to tentative agency decisions; and

(3) supporting reasons for the exception of proposed findings or conclusions. The record shall show the ruling on each finding, conclusion, or exception presented. All decisions, including initial, recommended, and tentative decisions, are a part of the record and shall include a statement of-

(A) findings and conclusions and the reasons or basis therefor, on all the material issues of fact, law, or discretion presented on the record; and

(B) the appropriate rule, order, sanction, relief, or denial thereof.

(d)

(1) In an agency proceeding which is subject to subsection (a) of this section, except to the extent required for the disposition of ex parte matters as authorized by law-

(A) no interested person outside the agency shall make or knowingly cause to be made to any member of the body comprising the agency, administrative law judge, or other employee who is or may reasonably be expected to be involved in the decisional process of the proceeding, an ex parte communication relevant to the merits of the proceeding;

(B) no member of the body comprising the agency, administrative law judge, or other employee who is or may reasonably be expected to be involved in the decisional process of the proceeding, shall make or knowingly cause to be made to any interested person outside the agency an ex parte communication relevant to the merits of the proceeding;

(C) a member of the body comprising the agency, administrative law judge, or other employee who is or may reasonably be expected to be involved in the decisional process of such proceeding who receives, or who makes or knowingly causes to

be made, a communication prohibited by this subsection shall place on the public record of the proceeding:

(i) all such written communications;

(ii) memoranda stating the substance of all such oral communications; and

(iii) all written responses, and memoranda stating the substance of all oral responses, to the materials described in clauses (i) and (ii) of this subparagraph;

(D) upon receipt of a communication knowingly made or knowingly caused to be made by a party in violation of this subsection, the agency, administrative law judge, or other employee presiding at the hearing may, to the extent consistent with the interests of justice and the policy of the underlying statutes, require the party to show cause why his claim or interest in the proceedings should not be dismissed, denied, disregarded, or otherwise adversely affected on account of such violation; and

(E) the prohibitions of this subsection shall apply beginning at such time as the agency may designate, but in no case shall they begin to apply later than the time at which a proceeding is noticed for hearing unless the person responsible for the communication has knowledge that it will be noticed, in which case the prohibitions shall apply beginning at the time of his acquisition of such knowledge.

....

**Sec. 558 [5 U.S.C. 558]. Imposition of Sanctions; Determination of Applications For Licenses; Suspension, Revocation, and Expiration of Licenses.**

....

(c) When application is made for a license required by law, the agency, with due regard for the rights and privileges of all the interested parties or adversely affected persons and within a reasonable time, shall set and complete proceedings required to be conducted in accordance with sections 556 and 557 of this title or other proceedings required by law and shall make its decision. Except in cases of willfulness or those in which public health, interest, or safety requires otherwise, the withdrawal, suspension, revocation, or annulment of a license is

lawful only if, before the institution of agency proceedings therefor, the licensee has been given—

(1) notice by the agency in writing of the facts or conduct which may warrant the action; and

(2) opportunity to demonstrate or achieve compliance with all lawful requirements.

When the licensee has made timely and sufficient application for a renewal or a new license in accordance with agency rules, a license with reference to an activity of a continuing nature does not expire until the application has been finally determined by the agency.

## **ATOMIC ENERGY ACT**

### **Sec. 181 [42 U.S.C. 2231]. General.**

The provisions of the Administrative Procedure Act (Public Law 404, Seventy-ninth Congress, approved June 11, 1946) shall apply to all agency action taken under this Act, and the terms “agency” and “agency action” shall have the meaning specified in the Administrative Procedure Act ....

### **Sec. 189 [42 U.S.C. 2239]. Hearings and Judicial Review.**

a.

(1)

(A) In any proceeding under this Act, for the granting, suspending, revoking, or amending of any license or construction permit, or application to transfer control, and in any proceeding for the issuance or modification of rules and regulations dealing with the activities of licensees, and in any proceeding for the payment of compensation, an award, or royalties under sections 153, 157, 186c., or 188, the Commission shall grant a hearing upon the request of any person whose interest may be affected by the proceeding, and shall admit any such person as a party to such proceeding. The Commission shall hold a hearing after thirty days' notice and publication once in the Federal Register, on each application under section 103 or 104b. for a construction permit for a facility, and on any application under section 104c. for a construction permit for a testing facility. In cases where such a

construction permit has been issued following the holding of such a hearing, the Commission may, in the absence of a request therefor by any person whose interest may be affected, issue an operating license or an amendment to a construction permit or an amendment to an operating license without a hearing, but upon thirty days' notice and publication once in the Federal Register of its intent to do so. The Commission may dispense with such thirty days' notice and publication with respect to any application for an amendment to a construction permit or an amendment to an operating license upon a determination by the Commission that the amendment involves no significant hazards consideration.

(B)

(i) Not less than 180 days before the date schedules for initial loading of fuel into a plant by a licensee that has been issued a combined construction permit and operating license under section 185b., the Commission shall publish in the Federal Register notice of intended operation. That notice shall provide that any person whose interest may be affected by operation of the plant, may within 60 days request the Commission to hold a hearing on whether the facility as constructed complies, or on completion will comply, with the acceptance criteria of the license.

(ii) A request for hearing under clause (i) shall show, prima facie, that one or more of the acceptance criteria in the combined license have not been, or will not be met, and the specific operational consequences of nonconformance that would be contrary to providing reasonable assurance of adequate protection of the public health and safety.

(iii) After receiving a request for a hearing under clause (i), the Commission expeditiously shall either deny or grant the request. If the request is granted, the Commission shall determine, after considering petitioners' prima facie showing and any answers thereto, whether during a period of interim operation, there will be reasonable assurance of adequate protection of the public health and safety. If the Commission determines that there is such reasonable assurance, it shall

allow operation during an interim period under the combined license.

(iv) The Commission, in its discretion, shall determine appropriate hearing procedures, whether informal or formal adjudicatory, for any hearing under clause (i), and shall state its reasons therefor.

(v) The Commission shall, to the maximum possible extent, render a decision on issues raised by the hearing request within 180 days of the publication of the notice provided by clause (i) or the anticipated date for initial loading of fuel into the reactor, whichever is later. Commencement of operation under a combined license is not subject to subparagraph (A).

....

b. The following Commission actions shall be subject to judicial review in the manner prescribed in chapter 158 of title 28, United States Code, and chapter 7 of title 5, United States Code:

(1) Any final order entered in any proceeding of the kind specified in subsection (a).

(2) Any final order allowing or prohibiting a facility to begin operating under a combined construction and operating license.

(3) Any final order establishing by regulation standards to govern the Department of Energy's gaseous diffusion uranium enrichment plants, including any such facilities leased to a corporation established under the USEC Privatization Act.

(4) Any final determination under section 1701(c) relating to whether the gaseous diffusion plants, including any such facilities leased to a corporation established under the USEC Privatization Act, are in compliance with the Commission's standards governing the gaseous diffusion plants and all applicable laws.

**Sec. 191 [42 U.S.C. 2241]. Atomic Safety and Licensing Board.**

a. Notwithstanding the provisions of sections 7(a) and 8(a) of the Administrative Procedure Act, the Commission is authorized to establish one or more atomic safety and licensing boards, each comprised of three members, one of whom shall be qualified in the conduct of administrative proceedings and two of whom shall have such technical or other qualifications as the Commission

deems appropriate to the issues to be decided, to conduct such hearings as the Commission may direct and make such intermediate or final decisions as the Commission may authorize with respect to the granting, suspending, revoking or amending of any license or authorization under the provisions of this Act, any other provision of law, or any regulation of the Commission issued thereunder.

The Commission may delegate to a board such other regulatory functions as the Commission deems appropriate. The Commission may appoint a panel of qualified persons from which board members may be selected.

....

**Sec. 193 [42 U.S.C. 2243]. Licensing of Uranium Enrichment Facilities.**

....

**(b) Adjudicatory Hearing.-**

(1) In General.-The Commission shall conduct a single adjudicatory hearing on the record with regard to the licensing of the construction and operation of a uranium enrichment facility under sections 53 and 63.

(2) Timing.-Such hearing shall be completed and a decision issued before the issuance of a license for such construction and operation.

(3) Single Proceeding.-No further Commission licensing action shall be required to authorize operation.

....

**NUCLEAR WASTE POLICY ACT**

**Sec. 134 [42 U.S.C. 10154]. Licensing of Facility Expansions and Transshipments.**

....

**(b) Adjudicatory Hearing-**

(1) At the conclusion of any oral argument under subsection (a), the Commission shall designate any disputed questions of fact, together with any remaining questions of law, for resolution in an adjudicatory hearing only if it determines that-

(A) there is a genuine and substantial dispute of fact which can only be resolved with sufficient accuracy by the introduction of evidence in an adjudicatory hearing; and

(B) the decision of the Commission is likely to depend in whole or in part on the resolution of such dispute.

(2) In making a determination under this subsection, the Commission-

(A) shall designate in writing the specific facts that are in genuine and substantial dispute, the reason why the decision of the agency is likely to depend on the resolution of such facts, and the reason why an adjudicatory hearing is likely to resolve the dispute; and

(B) shall not consider-

(i) any issue relating to the design, construction, or operation of any civilian nuclear power reactor already licensed to operate at such site, or any civilian nuclear power reactor for which a construction permit has been granted at such site, unless the Commission determines that any such issue substantially affects the design, construction, or operation of the facility or activity for which such license application, authorization, or amendment is being considered; or

(ii) any siting or design issue fully considered and decided by the Commission in connection with the issuance of a construction permit or operating license for a civilian nuclear power reactor at such site, unless

(I) such issue results from any revision of siting or design criteria by the Commission following such decision; and

(II) the Commission determines that such issue substantially affects the design, construction, or operation of the facility or activity for which such license application, authorization, or amendment is being considered.

....

(c) Judicial Review.-No court shall hold unlawful or set aside a decision of the Commission in any proceeding described in subsection (a) because of a failure by the Commission to use a particular procedure pursuant to this section unless-

(1) an objection to the procedure used was presented to the Commission in a timely fashion or there are extraordinary circumstances that excuse the failure to present a timely objection; and

(2) the court finds that such failure has precluded a fair consideration and informed resolution of a significant issue of the proceeding taken as a whole.

## NUCLEAR NON-PROLIFERATION ACT

### Sec. 304 [42 U.S.C. 2155a]. Export Licensing Procedures.

....  
(b) ... [T]he Commission shall, after consultations with the Secretary of State, promulgate regulations establishing procedures (1) for the granting, suspending, revoking, or amending of any nuclear export license or exemption pursuant to its statutory authority; (2) for public participation in nuclear export licensing proceedings when the Commission finds that such participation will be in the public interest and will assist the Commission in making the statutory determinations required by the 1954 Act, including such public hearings and access to information as the Commission deems appropriate ....

(c) The procedures to be established pursuant to subsection (b) shall constitute the exclusive basis for hearings in nuclear export licensing proceedings before the Commission and, notwithstanding section 189a. of the 1954 Act, shall not require the Commission to grant any person an on-the-record hearing in such a proceeding.  
....

## CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2004, a copy of the "Brief for the Federal Respondents," was served by mail, postage prepaid, upon the following counsel:

Jonathan M. Block  
Attorney for Citizens Awareness Network  
94 Main Street  
P.O. Box 566  
Putney, VT 05346-0566

Greer S. Goldman  
Lisa E. Jones  
Environment and Natural Resources Division  
U.S. Department of Justice  
601 'D' Street, N.W.  
Washington, D.C. 20530

Stephen M. Kohn  
Devon Carey  
National Whistleblower Legal Defense  
and Education Fund  
3233 P Street, N.W.  
Washington, D.C. 20007

Ellen C. Ginsberg  
Michael Bauser  
Nuclear Energy Institute  
1776 'I' Street, N.W., Suite 400  
Washington, D.C. 20006-3708

Michael Kirkpatrick  
Bonnie I. Robin-Vergeer  
Scott Nelson  
Public Citizen Litigation Group  
1600 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20009

Thomas F. Reilly  
Attorney General of Massachusetts  
Nora J. Chorover, Ass't Attorney General  
Environmental Protection Division  
One Ashburton Place, 18<sup>th</sup> Floor  
Boston, MA 02108

Richard Blumenthal  
Attorney General of Connecticut  
Matthew I. Levine, Ass't Attorney General  
Kimberly Massicotte  
55 Elm Street  
P.O. Box 120  
Hartford, CT 06106

Peter W. Heed  
Attorney General of New Hampshire  
Jennifer J. Patterson, Sr. Attorney General  
New Hampshire Dept. of Justice  
33 Capital Street  
Concord, NH 03301

Bill Lockyer  
Attorney General of California  
Kevin James, Deputy Attorney General  
1515 Clay Street, Suite 2000  
P.O. Box 70550  
Oakland, CA 94612-0550

Eliot Spitzer  
Attorney General of New York  
Caitlin J. Halligan, Solicitor General  
Peter H. Lehner, Chief  
Environmental Protection Bureau  
120 Broadway  
New York, NY 10271

  
Steven F. Crockett