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DTE Energy Fermi-2 Energy Center Neutron Flux Evaluation

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i

TABLE OF CONTENTS

Page	2
ACRONYMS AND ABBREVIATIONSiv	
1.0 INTRODUCTION1	
1.1 BACKGROUND	
1.2 SCOPE	
2.0 METHODS AND ASSUMPTIONS	
2.1 FLUX CALCULATION METHODOLOGY	
2.2 SELECTION OF REPRESENTATIVE PRE-EPU CORE	
2.3 INPUTS AND ASSUMPTIONS	
2.3.1 Core Loading	
2.3.2 (R,θ) Model	
2.3.3 (R,Z) Model	
2.3.4 Material Composition and Coolant Density	
2.3.5 Neutron Source Distribution	
2.4 BIAS AND UNCERTAINTY	
3.0 FLUX RESULTS	
3.1 NEUTRON FLUX AT RPV INSIDE SURFACE	
3.2 NEUTRON FLUX AT SURVEILLANCE CAPSULE LOCATION	
3.3 NEUTRON FLUX AT SHROUD INSIDE SURFACE	
3.4 NEUTRON FLUX AT TOP GUIDE AND CORE PLATE	
3.5 OBSERVATIONS	
4.0 NEUTRON FLUENCE	
5.0 REFERENCES	

ii

LIST OF TABLES

<u>Table</u>

<u>Title</u>

Page

LIST OF FIGURES

Figure	Title	<u>Page</u>
Figure 2-1.	Core Layout and Vessel Internal Components	9
Figure 2-2:	Schematic View of (R,Z) Model	10
Figure 2-3.	Relative Cycle Energy at Core Midplane	11
Figure 3-1.	Azimuthal Distribution of Fast Neutron Flux at RPV Inside Surface at Peak	
-	Elevation	15
Figure 3-2.	Axial Distribution of Relative Fast Neutron Flux at RPV Inside Surface	16
Figure 3-3.	Azimuthal Distribution of Fast Neutron Flux at Shroud Inside Surface at	
. –	Peak Elevation	17
Figure 3-4.	Axial Distribution of Relative Fast Neutron Flux at Shroud Inside Surface	18
Figure 4-1.	Axial Distribution of Fast Neutron Fluence at RPV Inside Surface at the	•
- ·,	Peak Azimuth	20
Figure 4-2.	Axial Distribution of Fast Neutron Fluence at Shroud Inside Surface at the	
-	Peak Azimuth	21

GE-NE-0000-0031-6254-R1-NP

ACRONYMS AND ABBREVIATIONS

BAF	Bottom of Active Fuel
BOC	Beginning of Cycle
CLTP .	Current Licensed Thermal Power
ECP	Engineering Computer Program
ENDF	Evaluated Nuclear Data File
EFPY	Effective Full-Power Year
EOC	End of Cycle
EPU	Extended Power Uprate
.GE	General Electric
GE-NE	General Electric Nuclear Energy
IASCC .	Irradiation Assisted Stress Corrosion Cracking
ID .	Inside Diameter
LTR	Licensing Topical Report
MWt	Megawatt Thermal
NRC	Nuclear Regulatory Commission
OD	Outside Diameter
ORNL	Oak Ridge National Laboratory
RG	Regulatory Guide
RPV	Reactor Pressure Vessel
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iv ·

1.0 INTRODUCTION

1.1 Background

Neutron irradiation of the reactor pressure vessel (RPV) causes reduction in material ductility and creates structural embrittlement at higher operating temperatures. The effect is particularly significant when impurities such as nickel, copper, or phosphorus are present in noticeable levels, as is commonly true for the RPV steel. Therefore determination of neutron fluence level is one of the first steps toward RPV fracture toughness evaluations.

Irradiation by fast neutrons (with energies greater than 1 MeV) can also be a concern with respect to irradiation assisted stress corrosion cracking (IASCC) for reactor internal components such as core shroud, top guide, core plate, etc. Crack growth evaluation for these components also requires adequate determination of neutron fluence level.

Neutron flux, or fluence rate, can be determined through radiochemical analysis of the surveillance flux wire samples; which are made of iron, copper, or nickel, sealed inside a capsule and held in place by a holder near the RPV inside surface. The calculated ratio of surveillance sample flux to the RPV peak flux defines a lead factor. This lead factor can be applied to the sample dosimetry data to determine the RPV peak flux.

Neutron flux can also be determined by solving the Boltzmann neutron transport equation with the discrete ordinates method or Monte Carlo simulation. When appropriate bias is applied to the calculation results, these numerical methods can be used to obtain the best-estimate flux distribution.

1.2 Scope

GE has performed an RPV flux evaluation for the DTE Energy Fermi-2 plant to support a Fermi-2 Extended Power Uprate (EPU). Detailed flux calculations were performed for a representative pre-EPU cycle at the Current Licensed Thermal Power (CLTP) of 3430 MWt and for an EPU core that is representative of future cycles at the target power level of 3952 MWt. The NRC approved GE fluence methodology was used for these flux calculations. In addition, fluence distributions at the Effective-Full-Power Years (EFPY) of interest were evaluated based on the calculated CLTP and EPU flux distributions, in conjunction with the cycle-dependent energy generation data. The objective of this report is to document the flux/fluence evaluation.

2.0 METHODS AND ASSUMPTIONS

2.1 Flux Calculation Methodology

The current GE methodology for neutron flux calculation is documented in a Licensing Topical Report (LTR) NEDC-32983P-A [1], which was approved by the U.S. NRC in the Safety Evaluation Report for referencing in licensing actions [2]. In general, GE's methodology described in the LTR adheres to the guidance in Regulatory Guide 1.190 [3] for neutron flux evaluation.

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The flux calculations are performed with DORTG01V, which is a controlled version of the ORNL DORT computer code in the GE Engineering Computation Program (ECP) library [4]. The NRC has approved the use of DORT as part of the GE methodology [2].

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The cross section data used in the DORT calculation are processed with the nuclear cross-section processing package in the GE ECP. The basic cross section data library is the 80-group MATXS6D library, which was based on Version V of the Evaluated Nuclear Data File (ENDF/B-V) and was generated by the Los Alamos National Laboratory. This 80-group library has been revised to include upgraded cross sections from ENDF/B-VI for the important components of BWR neutron flux calculation - oxygen, hydrogen, and individual iron isotopes - to meet the guidelines of Regulatory Guide 1.190, Regulatory Position 1.1.2. [[

]] A P_3 truncation of the Legendre polynomial expansion, which meets Regulatory Position 1.1.2 in RG 1.190, is used to approximate the anisotropy in the differential scattering cross sections. The approach discussed here is consistent with the approved LTR methodology.

2.2 Selection of Representative Pre-EPU Core

It was agreed between GE and DTE Energy that a single representative core would be selected to be the basis for the pre-EPU flux calculations. In order to determine the cycle that would be used, a series of flux calculations were performed for Cycles 1-9 based on the core data retrieved from the GE Engineering Data Bank. The peak RPV ID flux was calculated in each case and used as the basis for selecting the representative pre-EPU cycle.

The results of calculated peak RPV ID fluence for Cycles 1-9 indicate that Cycle 6 is the suitable choice to represent the pre-EPU cycles. Using Cycle 6 as the representative cycle for the pre-EPU cycles would impose a conservatism of about 10% on the pre-EPU fluence.

2.3 Inputs and Assumptions

The operating condition assumed for this analysis is based on the specific core design data of the cycles of interest. Pertinent core data were retrieved and processed from GE's Engineering Data Bank. These data include the three-dimensional descriptions of fuel bundle configuration, initial uranium mass, fuel exposure, and exposure-dependent water density (or void fraction) data.

The RPV and shroud dimensions, jet pump dimensions/configuration, and the configuration and location of surveillance capsule holder are verified data through the Design Input Request (DIR) and DTE Energy response/concurrence. These data are summarized in Table 2-1.

2.3.1 Core Loading

The Cycle 6 core contains 92 bundles of GE6, 47 bundles of GE9, and 625 bundles of GE11. The active fuel length is 150 inches for GE6 and GE9, and 146 inches for GE11. Fuel bundles in the outermost row contain only GE6 fuel. The axial flux shape for the RPV and shroud will be mostly impacted by these peripheral bundles.

The EPU cycle contains a full core load of GE14 fuel. The active fuel length is 150 inches.

2.3.2 (R,θ) Model

Figure 2-1 shows a quadrant of the core and the vessel internal components that are relevant to the flux calculation. [[

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In the angular coordinate θ , the mesh size is ½ degree per mesh interval, except for the two boundary nodes, which is ½ degree. For a core quadrant, a total of 181 fine meshes are used in the θ -direction. This model is more detailed than the minimum requirement of 40 intervals per octant stipulated in Section 1.3.1 of RG 1.190.

Radial meshes vary in sizes. Sufficient fine mesh steps are provided to simulate the outer boundary profiles of the core. [[

radial mesh size for each region has been selected to conform to the minimum requirements of RG 1.190, Section 1.3.1. [[

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The (r,θ) calculation is performed for the first quadrant of the reactor. The model includes three sets of jet-pump/riser, which are centered at 30°, 60°, and 90°. It also includes the 30° capsule, which is completely shadowed by the jet-pump riser. The azimuthal distribution of RPV flux in the first quadrant is expected to be representative of other quadrants because of the quadrant symmetry in the power distribution. The RPV flux at 0 and 180 degrees is expected to be higher than that at 90 and 270 degrees, due to the absence of jet pumps.

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2.3.3 (R,Z) Model

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]] The radial mesh size for each region has

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been selected to conform to the minimum requirements of RG 1.190, Section 1.3.1. [[

2.3.4 Material Composition and Coolant Density

Material compositions in each calculation model are treated as homogeneous mixtures. The volume fractions of solid material in each core region are calculated based on specific fuel bundle design data. [[

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NRC approved [5].

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2.3.5 Neutron Source Distribution

Spatial distribution of the neutron source density is simulated based on relative cycleintegrated energy production in conjunction with the fission energy and fission yield data. [[

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Figure 2-3 shows the bundle-dependent relative cycle energy (normalized to the core average) at core midplane elevation (axial node 13) for Cycle 6 and the EPU cycle. These discrete data in the (x,y) plane are processed to form the neutron source distribution in the (r,θ) meshes for the (r,θ) calculation. The source distribution for the (r,z) calculation is generated from a similar process.

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2.4 Bias and Uncertainty

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Parameter	Unit	Data
(A) Surveillance Capsule Basket		
Thickness	inch	0.75
Width	inch	7
Length	inch	9.5
Azimuths	degree	30, 120, 300
Radial Position of Basket Center, from RPV Clad	inch	0.9375
Elevation, Bottom of Basket	inch	283.563
(B) RPV (Beltline Region)		
RPV Base Metal ID	inch	254
RPV Thickness	inch	6.125
RPV Clad Thickness	inch	0.3125
(C) Shroud (Active Fuel Region)	, .	·
Shroud ID	inch	203.125
Shroud Thickness	inch	2"
(D) Jet Pump Components		
Recirc. Inlet Nozzles Azimuths	degree	30, 60, 90, 120, 150, 210, 240, 270, 300, 330
Jet Pump Riser Pipe OD	inch	10.71
Jet Pump Riser Pipe ID	inch	10.136
Jet Pump Inlet Mixer OD	inch	8.734
Jet Pump Inlet Mixer ID	inch	8.18
Radial Location of Riser from Core Center	inch	112.28
Radial Offset, Mixer to Riser	inch	0 .
Distance between Mixers, centerline to centerline	inch	29.5

Table 2-1 Design Input Data for Flux Calculation

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Parameter	Unit	Data		
(E) Top Guide Beam				
Lower Elevation	inch	364.62 ·		
Upper Elevation	inch	380.69		
(F) Core Plate				
Elevation of top of core plate support flange	inch	191.12		
Upper Elevation	inch	211.31		
Thickness	inch	2		
(G) Other Core Data				
Thermal Power	MWt	3430 (CLTP) 3952 (EPU)		
Elevation of Bottom of Active Fuel (BAF)	inch	216.313		
Active Fuel Length	inch	150 (GE6, GE9, GE14) 146 (GE11)		

Table 2-1 Design Input Data for Flux Calculation (Cont.)



Figure 2-1. Core Layout and Vessel Internal Components

Figure 2-2: Schematic View of (R,Z) Model

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EPU C	Cyc	le:						•								
JN		1	2	3	4	5	6	7	. 8	9	10	11	12	13	14	15
	1	0.603	0.592	0.574	0.566	0.565	0.517	D.406			•					
	2	1.093	1.083	0.929	1.054	0.875	0.923	0.689	0.518							
	3	1.334	1.338	1.281	1.327	1.235	1.217	0.913	0.752	0.572	0.367					
	4	1258	1,409	1491	1403	1234	1.313	1275	1.104	0.780	0.577					
	5	1,460	1.564	1477 1477	1.546	1427	1.385	1366	1:057	1.111	0.764	0.607				
	6	1527	11481	1.583	1:464	516	1 498	皮油 1.367.	1.346	1.191	1.042	0.764	0.577	0.367		
	7	1131	1.528	1461	1228	1235	1)419	1,450	1.043	1.129	1.192	1.112	0.780	0.572		
	8	1166	1428	1.536	1332	1238	1.501	1.396	1248	1.044	1.347	1.058	1.105	0.752	0.517	
	9	1.312	1.530	1371	1.516	1428	1.297	1.513	1397	1.451	1.368	1.368	1277	0.914	0.691	D.409
	10	1476	1 427	11-520	1,401	13474	1304	1.297	1.502	1,422	1.502	1,388	1315	1.219	0.924	D.518
	11	1.141	1,475	1285	1.092	1.107	1474	1,429	1239	1.249	1.520	1434	1.236	1.237	0.877	D.565
	12	1.146	1,403	1,455	1.095	1.091	1401	1517	1334	1.230	1.466	1.550	1405	1.329	1.056	0.566
	13	1487	1 455	1299	1454	1.284	1.519	1370	1.537	1.462	1.585	1479	1,493	1.282	0.932	0.575
	14	1.409	1.524	1,455	1403	1474	1427	1.530	1.428	1.529	1.482	1.566	1411	1.340	1.085	0.592
	15	1.102	1,409	1.487	1.145	1.140	1.475	1311	1.166	1.131	1.528	1461	1.260	1.336	1.094	0.603

Figure 2-3. Relative Cycle Energy at Core Midplane

Cycle 6:

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	1	- 2	3	4	5	6	· 7	8	9	10	11	12	13	14	15
1	0.506	0.511	0.491	0.491	0.465	D.442	0.365					· ~			
2	1.035	1.035	0.885	1.012	0.890	0.986	0.837	0.522							
з	1.168	1.193	0.920	1.174	0.876	1.139	0.825	0.959	0.592	0.381			•		
· 4	0.973	1.339	1314	1.320	1,298	1390	1251	1.187	1.086	0.625					
5	1.353	1,039	1441	1223	1491	1414	1472	1.318	1.205	1.113	0.657				
. 6	1.135	1411	1402	1.478	1,398	1.553	1409	1.477	1,302	1.299	1.124	0.634	0.391		
7	1-110	11138	1430	1-111	1.190	1415	1,550	1347	1.000	1.328	1.230	1.104	0.601		
8	1011	1349	1299	1.165	11139	1.546	1443	1.286	1.346	2月月 1,494	1340	1.192	0.968	0.515	
9	1298	1043	1310	1146	1475	1436	1336	1442	1.564	1,437	1495	1.264	0.834	0.835	0,367
10	1.062	1254	11186	1357	1337	12468	1467	1569	1.442	1.585	439	1,415	1.176	0.966	0,438
11	1 985	4488	1067	0.943		1382	1.574	1180	1,217	1438	1.524	5 (# -) 1 333	0.890	0.871	0.460
12	1 079	1 293	1202	1 022	0.994	1458		1218	1.156	1 528	1 258	1 329	1,180	0.917	0.481
13	2.51	1 200	1367	1 335	月1739	1 380	1.520		1.505	1.457	1480	1,319	0.833	0.897	0.493
14	1237	1 172	1-241		1/101	507	1235	5 A77	1 210	7953	1 070	252 21	1 215	1 053	0.520
15	1.180	1.253	1,468	1.177	1.111	1205	1.463	1.106	1.176	1.189	1.408	1.004	1.217	1.062	0.527

11

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3.0 FLUX RESULTS

This section documents the flux results from the calculation of the representative pre-EPU core and the EPU core. Per agreement with DTE Energy, a factor of 1.1 has been applied to the calculated EPU flux values to cover any potential non-conservatism owing to the use of the equilibrium cycle core design developed for the EPU project.

3.1 Neutron Flux at RPV Inside Surface

The calculated peak fast flux at the RPV inside surface is shown below:

Parameter	Elevation (Inches above BAF)	Azimuth (°)	Flux (n/cm ² -s)
RPV ID peak flux (>1.0 MeV) – EPU	85.1	64.0	.1.01E9
RPV ID peak flux (>1.0 MeV) – CLTP	101.6	26.5	8.73E8

Figure 3-1 shows the azimuthal flux distribution at the peak elevation for the first quadrant of the RPV. The effects of inelastic scattering by steel in the jet-pump components are clearly displayed in Figure 3-1, where the flux depression occurs in regions shadowed by metal components. Fluxes for other quadrants are expected to be similar due to quadrant symmetry of the core loading as well as the arrangement of vessel internal components.

Figure 3-2 shows the axial flux variation at the RPV inside surface. The ratio of peak flux to midplane (75 inches above the BAF) flux is 1.06 for CLTP and 1.01 for EPU. These axial adjustment factors have been incorporated in the calculation of the peak flux.

3.2 Neutron Flux at Surveillance Capsule Location

The calculated fast flux and lead factor at the capsule location is shown below:

Capsule No.	Azimuth O	Flux (n/cm ² -s)	Lead Factor
1, 2, and 3 – EPU	30, 120, and 300	1.06E9	1.05
1, 2, and 3 – CLTP	30, 120, and 300 .	9.11E8	. 1.04

3.3 Neutron Flux at Shroud Inside Surface

The calculated peak fast flux at the shroud inside surface is shown below:

Parameter	Elevation (Inches above BAF)	Azimuth (*)	Flux (n/cm ² -s)
Shroud ID peak flux (>1.0 MeV) - EPU	78.4	. 65.5	2.78E12
Shroud ID peak flux (>1.0 MeV) – CLTP	109.5	24.5	2.37E12

Figure 3-3 shows the azimuthal flux distribution at the core midplane elevation for the first quadrant of the shroud. Fluxes for other quadrants are expected to be similar due to quadrant symmetry of the core loading.

Figure 3-4 shows the axial flux variation at the shroud inside surface. The ratio of peak flux to midplane (75 inches above the BAF) flux is 1.10 for CLTP and 1.00 for EPU. These axial adjustment factors have been incorporated in the calculation of the peak flux.

3.4 Neutron Flux at Top Guide and Core Plate

The estimated bounding fast fluxes at the top guide and core plate are shown below:

Parameter		Flux (n/cm ² -s)
Top Guide bounding flux (>1.0 MeV) – EPU	•	1.06E13
Top Guide bounding flux (>1.0 MeV) – CLTP	•	5.81E12
Core Plate bounding flux (>1.0 MeV) – EPU	•	7.74E11
Core Plate bounding flux (>1.0 MeV) – CLTP	•	6.32E11

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3.5 Observations

Compared to the CLTP flux, EPU flux increase is approximately 16% at the RPV ID and capsule locations, which is approximately the same as the percent change in power from CLTP to EPU. In the case of the shroud the increase is 17% going from CLTP to EPU. The peak elevation for the shroud and RPV flux distribution shifts towards the core midplane for the EPU, due to the core load of GE14 fuel with part-length rods.

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The calculated EPU lead factor of 1.05 is not significantly different from the CLTP lead factor of 1.04. Variation of the lead factor is expected due to change in the axial and azimuthal flux distributions that affect both the capsule flux and the peak RPV flux.

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Figure 3-2. Axial Distribution of Relative Fast Neutron Flux at RPV Inside Surface







Figure 3-4. Axial Distribution of Relative Fast Neutron Flux at Shroud Inside Surface

4.0 NEUTRON FLUENCE

The flux results reported in this evaluation are used to calculate the fluences for the target EFPY of interest. Based on the cycle power and cycle energy generation data provided by DTE Energy, the total energy generated for Cycles 1-10 is 15,089 GWd. This is equivalent to 12.04 EFPY at the CLTP of 3430 MWt. The flux values at CLTP will be used for this portion of the plant lifetime for the calculation of the fluence. The remainder of the lifetime is conservatively assumed to be operating at the EPU power level.

Using the notation Φ_{CLTP} as the flux at CLTP and Φ_{EPU} as the flux for EPU, fluence can be calculated as

32-EFPY Fluence = $(\Phi_{CLTP} * 12.04 + \Phi_{EPU} * 19.96)*(365.25*24*3600) n/cm^2$. 24-EFPY Fluence = $(\Phi_{CLTP} * 12.04 + \Phi_{EPU} * 11.96)*(365.25*24*3600) n/cm^2$.

Parameter	32-EFPY Fluence (n/cm ²)	24-EFPY Fluence (n/cm ²)
RPV ID peak fluence (>1.0 MeV)	9.68E17	7.13E17
Shroud ID peak fluence (>1.0 MeV)	2.65E21	1.94E21
Top guide bounding fluence (>1.0 MeV)	8.87E21	6.20E21
Core plate bounding fluence (>1.0 MeV)	7.28E20	5.32E20
Girth weld (elevation 28.3125 inches above BAF) peak fluence (>1.0 MeV)	6.23E17	4.66E17

The calculated fluence values are shown below:

Figure 4-1 shows the axial fluence distribution at the peak azimuth at the RPV inside surface. Two sets of fluence data are presented: at the end of 40 years (32 EFPY) and at intermediate time of 24 EFPY, which will be used for the P-T curve evaluation. Figure 4-2 shows similar data for the shroud inside surface.

Figure 4-1 shows that, at the end of 40-year plant life, the region of fast fluence greater than $1.0E17 \text{ n/cm}^2$ extends from 5.8 inches below and 158.4 inches above BAF elevation. For the 24 EFPY, the region extends from 3.5 inches below and 155.2 inches above BAF elevation.









5.0 REFERENCES

- 1. NEDC-32983P-A, Rev. 1, "Licensing Topical Report, General Electric Methodology for Reactor Pressure Vessel Fast Neutron Flux Evaluations," December 2001.
- Letter, S. A. Richards (USNRC) to J. F. Klapproth, "Safety Evaluation for NEDC-32983P, General Electric Methodology for Reactor Pressure Vessel Fast Neutron Flux Evaluation (TAC No. MA9891)," MFN 01-050, September 14, 2001.
- 3. Regulatory Guide 1.190, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence," U.S. NRC, March 2001.
- 4. CCC-543, "TORT-DORT Two- and Three-Dimensional Discrete Ordinates Transport Version 2.8.14," Radiation Shielding Information Center (RSIC), January 1994.
- Letter, S. A. Richards (USNRC) to G. A. Watford, "Amendment 26 to GE Licensing Topical Report NEDE-24011-P-A, GESTAR II – Implementing Improved GE Steady-State Methods (TAC No. MA6481)," November 10, 1999.