

October 21, 2005

Mr. Gordon Bischoff, Manager  
Owners Group Program Management Office  
Westinghouse Electric Company  
P.O. Box 355  
Pittsburgh, PA 15230-0355

SUBJECT: DRAFT SAFETY EVALUATION FOR WESTINGHOUSE OWNERS GROUP  
TOPICAL REPORT WCAP-16083-NP, REVISION 0, "BENCHMARK TESTING  
OF THE FERRET CODE FOR LEAST SQUARES EVALUATION OF LIGHT  
WATER REACTOR DOSIMETRY" (TAC NO. MC3974)

Dear Mr. Bischoff:

By letter dated July 30, 2004, as supplemented by letter dated March 30, 2005, the Westinghouse Owners Group (WOG) submitted Topical Report (TR) WCAP-16083-NP, Revision 0, "Benchmark Testing of the FERRET Code for Least Squares Evaluation of Light Water Reactor Dosimetry," to the U.S. Nuclear Regulatory Commission (NRC) staff for review.

The NRC staff has completed the review of WCAP-16083-NP, Revision 0, and has determined that the proposed methodology in WCAP-16083 satisfies the guidance in Regulatory Guide 1.190, adopts the recommendations regarding dosimetry practices from several American Society for Testing and Materials standards, and it has been benchmarked against the National Institute of Standards and Technology fission sources and against the acceptable dosimetry measurements. Therefore, this methodology is acceptable for use in licensing actions regarding light-water reactor dosimetry, subject to the limitation described in the attached draft safety evaluation (SE).

Twenty working days are provided to you to comment on any factual errors or clarity concerns contained in the SE. The final SE will be issued after making any necessary changes and will be made publicly available. The NRC staff's disposition of your comments on the draft SE will be discussed in the final SE.

To facilitate the NRC staff's review of your comments, please provide a marked-up copy of the draft SE showing proposed changes and provide a summary table of the proposed changes.

G. Bischoff

- 2 -

If you have any questions, please contact Girija Shukla at (301) 415-8439.

Sincerely,

/RA/

Daniel S. Collins, Acting Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Project No. 694

Enclosure: Draft Safety Evaluation

cc w/encl:  
Mr. James A. Gresham, Manager  
Regulatory Compliance and Plant Licensing  
Westinghouse Electric Company  
P.O. Box 355  
Pittsburgh, PA 15230-0355

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OFFICE	PDIV-2/PM	PDIV-2/LA	SRXB/SC*	PDIV-2/SC(A)	PDIV/D
NAME	GShukla	LFeizollahi	JNakoski	DCollins	HBerkow
DATE	10/4/05	10-4-05	8/30/05	10/19/05	10/21/05

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DRAFT SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
TOPICAL REPORT WCAP-16083-NP, REVISION 0, "BENCHMARK TESTING OF THE  
FERRET CODE FOR LEAST SQUARES EVALUATION OF LIGHT WATER REACTOR  
DOSIMETRY" WESTINGHOUSE OWNERS GROUP  
PROJECT NO. 694

1     1.0     INTRODUCTION

2     By letter dated July 30, 2004, as supplemented by letter dated March 30, 2005 (References 1  
3     and 2, Agencywide Documents Access and Management System Accession  
4     nos. ML042160524, and ML050910119, respectively), the Westinghouse Owners Group  
5     (WOG) submitted Topical Report WCAP-16083-NP, Revision 0, "Benchmark Testing of the  
6     FERRET Code for Least Squares Evaluation of Light Water Reactor Dosimetry," to the Nuclear  
7     Regulatory Commission (NRC) staff for review.

8     The methodology proposed in WCAP-16083 consists of three phases: (1) collection of a data  
9     base of benchmarked plant-specific neutron transport calculations and corresponding dosimetry  
10    measurements at in-vessel and ex-vessel locations, (2) a least squares analysis involving the  
11    calculated and measured data, and (3) use of the results to demonstrate consistency of  
12    measured and calculated values and to validate calculated values at locations on the vessel  
13    inside diameter. The least squares adjustment method uses neutron spectra adjustment,  
14    dosimeter spectral coverage, transport calculation uncertainties, measured reaction rates, and  
15    dosimeter cross sections and their uncertainties. This approach is endorsed by and is  
16    summarized in American Society of Testing and Materials (ASTM) Standard E 944-02  
17    (Reference 3).

18    The purpose of this review is to describe the code, establish whether the method adheres to the  
19    guidance in Regulatory Guide (RG) 1.190 (Reference 4), examine the validation of the code  
20    and evaluate the acceptability of the proposed method in light water reactor (LWR) licensing  
21    actions.

22    2.0     REGULATORY EVALUATION

23    The basis for this review is RG 1.190 (Reference 4) that is based on General Design  
24    Criteria 14, 30, and 31, and describes the attributes of neutron transport methodologies which  
25    are acceptable to the NRC staff. RG 1.190 specifies that the neutron transport methods should  
26    be benchmarked to a statistically significant data base of measurement-to-calculation ratios  
27    (M/C) and that existing bias and uncertainties be estimated. In addition, the RG allows the use  
28    of suitably weighted averages of the M/C values.

## 3.0 SUMMARY OF THE FERRET LEAST-SQUARES ADJUSTMENT METHODOLOGY

### 3.1 Background

The proposed least squares adjustment (LSA) method combines measurement data with corresponding neutron transport calculations to establish a best estimate spectrum and an estimate of the applicable uncertainties at the location of the measurement. The spectrum is then used to calculate best estimate values of exposure quantities, such as activation rates, fluence, and iron displacements per atom. The FERRET code, which is a least squares adjustment, has been applied successfully in many reactor vessel applications. The ASTM promulgated the standard E 944-02 to address the application of neutron spectrum adjustment methods to reactor surveillance dosimetry. It is assumed that neutron transport is using the discrete elements method as in the DORT Code (Reference 5).

### 3.2 Application of the Methodology

The general objective of an LSA method is to reconcile measured and calculated reaction rates, dosimetry and transport cross sections, and calculated neutron energy spectra within their corresponding uncertainties. In general, the following expression relates reaction rate  $R_i$  to neutron energy spectrum  $\phi_g$ , and to dosimeter (group) reaction cross section  $\sigma_{ig}$ , each with a corresponding uncertainty  $\delta$ :

$$R_i \pm \delta_{R_i} = 3 (\sigma_{ig} \pm \delta_{\sigma_{ig}}) (\phi_g \pm \delta_{\phi_g})$$

Application of the LSA method requires the following information for a specific measurement: (1) a calculated spectrum and its uncertainty, (2) dosimeter measured reaction rate and uncertainty, and (3) dosimetry reaction cross sections and their uncertainty. The plant-specific neutron transport calculations yielding the neutron energy spectrum should follow the guidance in RG 1.190.

### 3.3 Neutron Transport Calculations and Uncertainty

The neutron transport calculation forms the basis for a reliable LSA. The flux synthesis method is used to calculate the three-dimensional neutron flux distribution  $\phi(r, \theta, z)$  as follows:

$$\phi(r, \theta, z) = \{(\phi(r, \theta) * \phi(r, z))\} / \phi(r)$$

where  $\phi(r, \theta)$ ,  $\phi(r, z)$  and  $\phi(r)$  are the azimuthal, axial and radial flux distributions, respectively.

The WOG is using the DORT (Reference 5) discrete ordinates code and the BUGLE-96 (Reference 6) cross section library. An anisotropic scattering is treated with a minimum of a  $P_3$  approximation and an  $S_8$  minimum angular quadrature. As stated previously, transport calculations follow the guidance in RG 1.190.  $P_3$  and  $S_8$  are discussed in some detail in RG 1.190.

### 3.4 Geometric Modeling

1 In developing the geometrical representation of the vessel, core, and internal components the  
2 effort is to use "as-built" dimensions where available. Water temperatures (and thus water  
3 densities) are assumed at full power. The core is represented as a mixture of fuel, cladding,  
4 water, and structural materials at temperatures representing full-power operation. The choice  
5 of mesh size in the axial, radial, and azimuthal directions are chosen to achieve convergence in  
6 the inner iterations. In general, smaller intervals are chosen in areas where large flux gradients  
7 are anticipated. Normally, quarter core or octant core symmetry is applied. The core baffle, the  
8 former plates, and the thermal shield are represented as individual components.

### 9 3.5 Neutron Source

10 The source distribution is obtained from pin-wise power distribution from the two outer row fuel  
11 assemblies. The fuel isotopic composition is accounted for as a weighting factor in the power-  
12 to-neutron conversion. The (r,  $\theta$ ) geometry transposition to (x, y) uses an area weighting to  
13 assign source strength to each (x, y) cell from the corresponding (r,  $\theta$ ) cell(s).

### 14 3.6 Validation of the Transport Calculation

15 The WOG used the transport method described in WCAP-14040-A (Reference 7) that has been  
16 approved by the NRC staff. The validation was based on the guidance in RG 1.190 and  
17 included comparison to the Oak Ridge Pool Critical Assembly (PCA), the H. B. Robinson  
18 dosimetry benchmark experiment, an experimental data base consisting of a large number of  
19 surveillance capsules from a variety of operating plants, and an analytical sensitivity study  
20 addressing the major uncertainty components.

21 The WCAP-16083 validation includes three stages: (1) methods' validation addressing the  
22 adequacy of the transport calculation and associated dosimetry and cross sections, (2)  
23 validation of uncertainties that are methods-related, and (3) validation addressing uncertainties  
24 that are related to lack of knowledge of code input parameters. The overall calculational  
25 uncertainty is established from the above components.

### 26 3.7 Uncertainty Input to LSA

27 The neutron energy spectrum in each measurement location is input as an absolute value.  
28 Spectrum uncertainty is obtained from plant-specific transport calculations also at the location  
29 of the measurement. The spectrum input uncertainties should be consistent with the  
30 benchmarking results discussed in Section 3.6. The uncertainty matrix is constructed from the  
31 following relationship:

$$32 \quad M_{g'g} = R_n^2 + R_g * R_{g'} * P_{g'g}$$

33 where  $R_n$  is the overall fractional normalization uncertainty,  $R_g$  and  $R_{g'}$  are groupwise  
34 uncertainties, and  $P_{g'g}$  is a group correlation matrix. Analytic expressions for  $P_{g'g}$  are also  
35 provided. The normalization uncertainty is related to the magnitude of the spectrum, while the  
36 groupwise uncertainties are related to the shape of the spectrum. WCAP-16083 provides  
37 specific numerical values for the uncertainties.

### 38 3.8 Reaction Rate Measurement and Uncertainties

1 WCAP-16083 lists the standard dosimeters used by The WOG: Cu-63(n, $\alpha$ )Co-60,  
2 Ti-46(n,p)Sc-46, Fe-54(n,p)Mn-54, Ni-58(n,p)Co-58, U-238(n,f) fp (Cd covered), Np-237(n,f) fp  
3 (Cd covered), Co-59(n, $\gamma$ )Co-60 (with and without Cd cover). This dosimeter set provides  
4 adequate spectral coverage. WCAP-16083 lists the ASTM standards relevant to the  
5 recommended practice for the use of these monitors. The analytical expression to calculate the  
6 average dosimeter activation for a given power level from the measured activation rate is given.  
7 The section concludes with values of specific uncertainties and their justification.

### 8 3.9 Dosimetry Cross Sections and Uncertainties

9 The activation cross sections and the associated uncertainties are obtained from the SNLRML  
10 library (Reference 8) that is based on the ENDF/B-VI file.

## 11 4.0 TESTING OF THE FERRET PROCESSING PROCEDURES

12 As noted above, FERRET combines the dosimeter reaction rate measurements with the results  
13 of the neutron transport calculations, dosimetry reaction cross sections, and neutron spectra to  
14 calculate a best estimate fast neutron flux ( $E > 1.0$  MeV) at the location of the measurement.  
15 The process is divided into two steps: (1) processing of the calculated spectra and dosimetry  
16 cross sections and (2) application of the FERRET algorithm. Each of the steps is individually  
17 tested as outlined in the following paragraphs.

### 18 4.1 Data Comparison in the National Institute of Standards and Technology (NIST) U-235 19 Fission Field

20 The SNLRML cross sections are collapsed 53 energy groups using the calculated energy  
21 spectrum as a weighting function. The FERRET report used the data in ASTM report E261-98  
22 (Reference 9) fission spectrum averaged cross sections applicable to U-235 and Cf-252  
23 spectra. The section lists numerous other comparisons with existing data to conclude that the  
24 SNLRML library and the FERRET processing result in accurate cross section values.

### 25 4.2 Evaluation of the PCA Simulator Benchmark

26 RG 1.190 recommends benchmarking to the results of the PCA (Reference 10). In the past,  
27 PCA has been analyzed by several researchers using least squares codes. The WOG updated  
28 the existing calculations using updated cross sections. Comparison of the measured values to  
29 the updated calculated results demonstrates good-to-excellent agreement after the adjustment.  
30 In addition, comparisons indicate consistency of the FERRET results from other analyses'  
31 methods and for all the measured locations.

### 32 4.3 Evaluation of the H.B. Robinson Benchmark

33 The H.B. Robinson (Reference 11) vessel dosimetry measurements were also used in the  
34 FERRET benchmark. The transport calculations were carried out using the BUGLE-96 library  
35 based on the ENDF/B-VI file, the  $P_3$  anisotropic scattering, and the  $S_8$  angular quadrature  
36 approximations. The Robinson measurements consist of in-vessel and ex-vessel dosimetry.  
37 The FERRET adjustment for both sets is very small and consistent with the uncertainty bounds.

1     5.0     FERRET SENSITIVITY STUDIES

2     The purpose of the sensitivity study is to evaluate the impact of the spectral uncertainty and of  
3     the foil composition on the LSA.

4     5.1     Composition of the Multiple Foil Sensor Set

5     In this case, the spectral uncertainties were held constant as well as the uncertainties  
6     associated with the reaction rates. The base case consisted of a set of six dosimeters (Cu, Ti,  
7     Fe, Ni, U-238, and Np-237). Ten additional cases were constructed by dropping one or more  
8     dosimeters from the base case and calculating the adjusted/calculated (A/C) ratio. These were  
9     then compared to the base case. The results indicate that for minimum uncertainty the  
10    dosimeter set should include Fe, U-238, and Np-237 foils.

11    5.2     Input Uncertainties

12    In this part of the study the reaction rate and the spectrum uncertainties were assigned high,  
13    medium, and low values. Considering the medium-medium case as the base-case the  
14    magnitude of the adjusted flux changes very little. However, the associated uncertainty  
15    changed considerably more, as expected.

16    6.0     TECHNICAL EVALUATION

17    6.1     Introduction and Historical Note

18    Least squares adjustments have been applied for many years in dosimetry analyses. The  
19    ASTM Standard E 944 (Reference 3) includes an extensive list of codes and methods that have  
20    been adopted for dosimetry problems. FERRET, in particular, which was developed at the  
21    Hanford Engineering Development Laboratory (HEDL), has been used in the liquid metal fast  
22    breeder reactor and the NRC-sponsored LWR pressure vessel surveillance dosimetry  
23    improvement program (LWR-PV-SDIP). The PCA benchmark experiment was part of the  
24    LWR-PV-SDIP program.

25    In the past, issues have been raised regarding the consistency of the M/C data bases for LWR  
26    applications. The WOG stated that variations due to neutron energies, dosimeter locations,  
27    transport and activation cross sections, and time periods have been removed.

28    As stated earlier, application of the FERRET code requires three types of input information:  
29    (1) calculated neutron energy spectrum and uncertainty, (2) measured reaction rates and  
30    uncertainties, and (3) energy-dependent dosimetry reaction cross sections. The following  
31    sections evaluate each input type.

32    6.2     Neutron Transport Calculations

33    Although the required information is the neutron spectra at the location of the measurements,  
34    an accurate neutron transport calculation is needed to obtain the spectra at given locations.

1 The method is based on the synthesis technique that combines two two-dimensional solutions  
2 in  $(r, \theta)$  and  $(r, z)$  to produce a three-dimensional flux:

$$\varphi(r, \theta, z) = [(\varphi(r, \theta) * (\varphi(r, z)))/[\varphi(r)]]$$

4 The transport calculation is carried out using the discrete ordinates, finite difference code  
5 DORT, using the BUGLE-96 cross sections, derived from the ENDF/B-VI file. This calculation  
6 adheres to the guidance in RG 1.190 and, therefore, it is acceptable.

### 7 6.3 Geometric Modeling

8 The geometric modeling should be designed to preserve the physical accuracy of the material  
9 regions. This is accomplished by using the appropriate number of mesh points. The  
10 description of this model states that up to 250 radial points, 110 azimuthal, and 150 axial points  
11 may be used. The point distribution is judicious by accommodating areas of expected high flux  
12 gradients and high total cross section. Also, the inner iteration convergence criterion is set at  
13 0.001. All of these features agree with the guidance in RG 1.190, therefore, the proposed  
14 geometrical model is acceptable.

### 15 6.4 Core Source

16 Because neutron sources are volumetric and in  $(x, y)$  geometry, their transposition to  $(r, \theta)$   
17 geometry must preserve the fuel volume. In addition, to assure that the energy spectrum is  
18 correct the isotopic composition of the fissionable nuclei must be represented correctly for the  
19 irradiation period represented in the calculation. Finally, the number of neutrons released per  
20 fission is also a function of the isotopic composition of the fissionable nuclei. The proposed  
21 method is designed to maintain the source volume and estimate the fissionable nuclei through  
22 burnup. The review indicates that the source calculation is acceptable because its transposition  
23 maintains the volume and accounts for its isotopic composition assuring correctness of the  
24 energy spectrum and the number of neutrons produced per fission.

### 25 6.5 Validation of the Transport Calculation

26 The validation process is based on the guidance in RG 1.190 and includes comparisons with  
27 the PCA benchmark experiment, the H. B. Robinson measurements, an analytic sensitivity  
28 study, and comparison to an extensive data base consisting of surveillance capsule  
29 measurements from operating plants. The validation addresses the adequacy of the transport  
30 calculational method, method related uncertainties, and uncertainties due to imperfect  
31 knowledge of the input data.

32 The results of the validation are well within the 20 percent ( $1\sigma$ ) uncertainty prescribed in RG  
33 1.190. In addition, the transport methodology is based on WCAP-14040-A that has been  
34 approved by the NRC. Because the methodology has been approved, the validation process is  
35 as prescribed by RG 1.190 and, the results are within recommended limits, the NRC staff finds  
36 the validation acceptable.

### 37 6.6 Uncertainty Input to the Least-squares Adjustment

1 The adjustment algorithm is based on the absolute value of the neutron spectrum at the  
2 location of the measurement. The input is the spectrum uncertainty and is expressed as an  
3 uncertainty matrix that contains the normalization uncertainty related to the magnitude of the  
4 spectrum and groupwise uncertainties. The values of the normalization and groupwise  
5 uncertainties presented in WCAP-16083 are within the range of similar values in the literature  
6 and well within the uncertainties specified in the transport solution, therefore, the proposed  
7 method is acceptable.

## 8 6.7 Reaction Rate Measurement and Uncertainties

9 Flux measurements in operating plants are accomplished with a set of dosimeters that assures  
10 good spectral coverage. Such a set was identified in Section 3.8 above. ASTM standards  
11 (E series) outline methods to optimize the efficiency and to maximize the accuracy of the  
12 dosimeter measurements. WCAP-16083-NP states that the applicable standard is used for  
13 each dosimeter. In addition to the threshold detectors (as listed in Section 3.8), solid state track  
14 recorders that directly measure total (fluence) exposure are also mentioned in  
15 WCAP-16803-NP. Conventional dosimeters measure activation that is converted analytically to  
16 an irradiation rate and subsequently to fluence. WCAP-16083-NP outlines the special  
17 procedures required for the fission dosimeters in particular. WCAP-16803-NP outlines several  
18 tests that demonstrate the historical improvement and evolution of dosimetry measurement  
19 accuracy. The values of the ( $1\sigma$ ) uncertainties for the dosimeter set in Section 3.8 are similar to  
20 those found in the literature. In summary, the NRC staff finds the reaction rate measurement  
21 uncertainty to be acceptable because the measurement process followed accepted standard  
22 procedures, because they have been benchmarked to existing standards, and because the  
23 values are comparable to those found in the literature.

## 24 6.8 Dosimetry Cross Sections and Uncertainty

25 Section 6.6 dealt with dosimeter uncertainties originating in the counting process. This section  
26 presents dosimeter activation cross section uncertainties. The uncertainties for the dosimeter  
27 set presented in Section 3.8 are part of the SNLRML library (Reference 8). These have been  
28 compiled from the most recent data and extensively tested for consistency and accuracy.  
29 Because the SNLRML cross sections and their uncertainties are in general use for dosimetry  
30 work and because they have been subjected to extensive testing, they are acceptable for the  
31 proposed least squares adjustment for FERRET.

## 32 6.9 Data Comparison in the NIST U-235 Fission Field

33 Measurements of the dosimeter cross sections and their uncertainties are recorded in ASTM  
34 E 261-98, "Standard Practice for Determining Neutron Fluence, Fluence Rate, and Spectra by  
35 Radioactivation Technique" (Reference 11). Comparisons of calculated and measured values  
36 of the cross sections in the U-235 spectrum and the same from the PCA measurements are  
37 shown in tabular form within ASTM E 261-98. Uncertainties documented in ASTM E261-98 are  
38 within the ( $1\sigma$ ) range. The calculational method employed in ASTM E 261-98 is the same as  
39 that used by The WOG, therefore, the results are applicable. The same data are also available  
40 for the Cf-252 spectrum with similar results. These results support the claim for the value of the  
41 uncertainties and their suitability for the least squares analysis in FERRET and, therefore, the  
42 results are acceptable.

1 6.10 Evaluation of the PCA Simulator Benchmark

2 RG 1.190 recommends the use of the results from the PCA experiment to compare and  
3 benchmark transport calculations and associated uncertainties. WCAP-16083-NP presents  
4 transport calculations for positions A<sub>1</sub> to A<sub>7</sub> representing the inside surface of the thermal shield  
5 to the outside of the pressure vessel, including the point inside the vessel thickness. The  
6 measured to calculated ratios fall in the range of 0.91 to 1.05. The adjusted values in terms of  
7 measured to adjusted ratios (M/A) are in the range of 0.94 to 1.06. The differences, the  
8 adjustments, and the uncertainties are small and consistent with the uncertainty bounds for the  
9 reaction rates and the neutron flux. The same conclusion is reached by analyzing similar  
10 calculations on PCA performed by HEDL, Oak Ridge National Laboratory (ORNL), and others.  
11 In summary, analyses of the PCA benchmark experiment using the FERRET code yielded  
12 results that are consistent with prescribed uncertainty bounds. The uncertainty bounds become  
13 smaller when adjusted using the FERRET code. This supports the use of the FERRET code.

14 6.11 Evaluation of the H. B. Robinson Benchmark

15 This is a case of laboratory quality surveillance applied to an operating plant. The analysis and  
16 evaluation were sponsored by the NRC, were performed by ORNL, and are documented in  
17 NUREG/CR-6453 (Reference 9). A discrete ordinates code was used with the BUGLE-96  
18 cross sections that are based on the ENDF/B-VI file. The calculations used the P<sub>3</sub> inelastic  
19 scattering and the S<sub>8</sub> angular quadrature approximations. Review of the M/C ratios (before  
20 adjustment) indicates that they fall in the range of 0.95 to 1.11. The M/A ratios adjusted  
21 individual dosimeter values fall in the range of 0.96 to 1.09. The FERRET code adjustment  
22 procedure reduced the uncertainty.

23 6.12 FERRET Sensitivity Studies

24 Two studies examine the relative position of the threshold dosimeters to the in-vessel and ex-  
25 vessel spectrum and the effect of the composition of the foil set in the accuracy of the results,  
26 assuming that the full set of detectors results in the most accurate results. These studies are  
27 not a necessary part of the adjustment procedure but are instructive to the dosimetry analyst.

28 The first exercise indicates that in order to validate a calculation of the neutron flux, spectral  
29 weighting should be included in the calculations. The other indicates that to minimize the  
30 uncertainty using dosimeter measurements the dosimeter set should as a minimum include Fe,  
31 U-235, and NP-237.

32 6.13 Conditions for the Applicability of Least-squares Adjustment

33 From the above discussion it is apparent that to successfully employ LSA, the measured and  
34 calculated values must be within their own uncertainty bounds. Should this not be the case,  
35 both measured and calculated values must be re-examined for possible errors and, if they  
36 cannot be found, the particular values should be disqualified. WCAP-16803-NP states that:  
37 (1) in the past, data base consistency issues have been raised and (2) that the data base used  
38 in the FERRET benchmarking meets this condition.

39 7.0 CONCLUSIONS AND LIMITATION

1 The WOG submitted the FERRET code for NRC staff review and approval. FERRET is a least  
2 squares adjustment code using calculated spectra weighting to minimize calculated value  
3 uncertainties. In addition to the spectra, it also uses measured reaction rates and dosimetry  
4 cross sections and associated uncertainties. The adjusted neutron fluxes could be used to  
5 form a data base to validate neutron transport calculations in accordance with the guidance in  
6 RG 1.190. The results of the FERRET adjustment have been benchmarked by comparison to  
7 measurements in NIST-calibrated fission sources, the PCA simulated benchmark experiment,  
8 and the H. B. Robinson vessel dosimetry benchmark experiment. The transport calculation and  
9 the dosimetry cross sections adhere to the guidance in RG 1.190.

10 For the reasons stated above, the NRC staff finds that the FERRET code is acceptable to be  
11 referenced in operating plant licensing actions subject to the following limitation:

- 12 ● LSA is acceptable if the adjustments to the M/C ratios and to the calculated spectra  
13 values are within the assigned uncertainties of the calculated spectra, the dosimetry-  
14 measured reaction rates, and the dosimetry reaction cross sections. Should this not be  
15 the case, the user should re-examine both measured and calculated values for possible  
16 errors. If errors cannot be found, the particular values should be disqualified.

## 17 8.0 REFERENCES

- 18 1. Letter from F.P. Schiffley II, Westinghouse Owners Group, to U.S. Nuclear Regulatory  
19 Commission, "Transmission of WCAP-16083-NP, Revision 0, 'Benchmark Testing of the  
20 FERRET Code for Least Squares Evaluation of Light Water Reactor Dosimetry,'" July  
21 30, 2004.
- 22 2. Letter from F.P. Schiffley II, Westinghouse Owners Group, to U.S. Nuclear Regulatory  
23 Commission, "Revision to WCAP-16083NP, Revision 0, 'Benchmark Testing of the  
24 FERRET Code for Least Squares Evaluation of Light Water Reactor Dosimetry,'" March  
25 30, 2005, and Letter from S. Anderson Westinghouse Owners Group to Lambros Lois,  
26 U.S. Nuclear Regulatory Commission "Historical Perspective on Reactor Dosimetry Data  
27 Bases," August 22, 2005.
- 28 3. ASTM Standard E 944-02, "Standard Guide for Application of Neutron Spectrum  
29 Adjustment Methods in Reactor Surveillance," Annual Book of ASTM Standards,  
30 Section 12, Volume 12.02, 2003.
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32 Pressure Vessel Neutron Fluence," U.S. Nuclear Regulatory Commission, March 2001.
- 33 5. DOORS 3.1, "One-, Two-, and Three-Dimensional Discrete Ordinates Neutron/Photon  
34 Transport Code System," Radiation Safety Information Computation Center, Computer  
35 Code Collection CCC-650, Oak Ridge National Laboratory (ORNL)  
36 August 1996.
- 37 6. BUGLE-96, "Coupled 47 Neutron, 20 Gamma Ray Group Cross Section Library Derived  
38 from ENDF/B-VI for LWR Shielding and Pressure Vessel Dosimetry Applications,"  
39 Radiation Shielding Information Center Data Library Collection DLC-185,  
40 Oak Ridge National Laboratory, March 1996.

- 1 7. WCAP-14040-A, Revision 3, "Methodology Used to Develop Cold Overpressure  
2 Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves," by  
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