

February 9, 2006

Mr. Richard M. Rosenblum  
Chief Nuclear Officer  
Southern California Edison Company  
San Onofre Nuclear Generating Station  
P.O. Box 128  
San Clemente, CA 92674-0128

SUBJECT: SAN ONOFRE NUCLEAR STATION, UNITS 2 AND 3, REQUEST FOR  
ADDITIONAL INFORMATION RE: RESPONSE TO GENERIC  
LETTER 2004-02, "POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON  
EMERGENCY RECIRCULATION DURING DESIGN-BASIS ACCIDENTS AT  
PRESSURIZED-WATER REACTORS" (TAC NOS. MC4714 AND MC4715)

Dear Mr. Rosenblum:

On September 13, 2004, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," as part of the NRC's efforts to assess the likelihood that the emergency core cooling system (ECCS) and containment spray system (CSS) pumps at domestic pressurized water reactors (PWRs) would experience a debris-induced loss of net positive suction head margin during sump recirculation. The NRC issued this GL to all PWR licensees to request that addressees (1) perform a mechanistic evaluation using an NRC-approved methodology of the potential for the adverse effects of post-accident debris blockage and operation with debris-laden fluids to impede or prevent the recirculation functions of the ECCS and CSS following all postulated accidents for which the recirculation of these systems is required, and (2) implement any plant modifications that the above evaluation identifies as being necessary to ensure system functionality. Addressees were also required to submit information specified in GL 2004-02 to the NRC in accordance with Title 10 of the *Code of Federal Regulations* Section 50.54(f). Additionally, in the GL, the NRC established a schedule for the submittal of the written responses and the completion of any corrective actions identified while complying with the requests in the GL.

By letter dated July 25, 2005, as supplemented by letter dated September 1, 2005, Southern California Edison Company provided a response to the GL. The NRC staff is reviewing and evaluating your response along with the responses from all PWR licensees. The NRC staff has determined that responses to the questions in the enclosure to this letter are necessary in order for the staff to complete its review. Please note that the Office of Nuclear Reactor Regulation's Division of Component Integrity is still conducting its initial reviews with respect to coatings. Although some initial coatings questions are included in the enclosure to this letter, the NRC might issue an additional request for information regarding coatings issues in the near future.

R. Rosenblum

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Please provide your response within 60 days from the date of this letter. If you have any questions, please contact me at (301) 415-1480.

Sincerely,

**/RA/**

N. Kaly Kalyanam, Project Manager  
Plant Licensing Branch IV  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-361 and 50-362

Enclosure:  
Request for Additional Information

cc w/encl: see next page

R. Rosenblum

-2-

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Plant Licensing Branch IV  
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Docket Nos. 50-361 and 50-362

Enclosure:  
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cc w/encl: see next page

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Units 2 and 3

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February 2006

San Onofre Nuclear Generating Station  
Units 2 and 3

cc:

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February 2006

## GL 2004-02 RAI Questions

### **Plant Materials**

1. Identify the name and bounding quantity of each insulation material generated by a large-break loss-of-coolant accident (LBLOCA). Include the amount of these materials transported to the containment pool. State any assumptions used to provide this response.
2. Identify the amounts (i.e., surface area) of the following materials that are:
  - (a) submerged in the containment pool following a LOCA,
  - (b) in the containment spray zone following a LOCA:
    - aluminum
    - zinc (from galvanized steel and from inorganic zinc coatings)
    - copper
    - carbon steel not coated
    - uncoated concrete

Compare the amounts of these materials in the submerged and spray zones at your plant relative to the scaled amounts of these materials used in the Nuclear Regulatory Commission (NRC) nuclear industry jointly-sponsored Integrated Chemical Effects Tests (ICET) (e.g., 5x the amount of uncoated carbon steel assumed for the ICETs).

3. Identify the amount (surface area) and material (e.g., aluminum) for any scaffolding stored in containment. Indicate the amount, if any, that would be submerged in the containment pool following a LOCA. Clarify if scaffolding material was included in the response to Question 2.
4. Provide the type and amount of any metallic paints or non-stainless steel insulation jacketing (not included in the response to Question 2) that would be either submerged or subjected to containment spray.

### **Containment Pool Chemistry**

5. Provide the expected containment pool pH during the emergency core cooling system (ECCS) recirculation mission time following a LOCA at the beginning of the fuel cycle and at the end of the fuel cycle. Identify any key assumptions.
6. For the ICET environment that is the most similar to your plant conditions, compare the expected containment pool conditions to the ICET conditions for the following items: boron concentration, buffering agent concentration, and pH. Identify any other significant differences between the ICET environment and the expected plant-specific environment.

Enclosure

7. For a LBLOCA, provide the time until ECCS external recirculation initiation and the associated pool temperature and pool volume. Provide estimated pool temperature and pool volume 24 hours after a LBLOCA. Identify the assumptions used for these estimates.

### **Plant-Specific Chemical Effects**

8. Discuss your overall strategy to evaluate potential chemical effects including demonstrating that, with chemical effects considered, there is sufficient net positive suction head (NPSH) margin available during the ECCS mission time. Provide an estimated date with milestones for the completion of all chemical effects evaluations.
9. Identify, if applicable, any plans to remove certain materials from the containment building and/or to make a change from the existing chemicals that buffer containment pool pH following a LOCA.
10. If bench-top testing is being used to inform plant-specific head loss testing, indicate how the bench-top test parameters (e.g., buffering agent concentrations, pH, materials, etc.) compare to your plant conditions. Describe your plans for addressing uncertainties related to head loss from chemical effects including, but not limited to, use of chemical surrogates, scaling of sample size and test durations. Discuss how it will be determined that allowances made for chemical effects are conservative.

### **Plant Environment Specific**

11. Provide a detailed description of any testing that has been or will be performed as part of a plant-specific chemical effects assessment. Identify the vendor, if applicable, that will be performing the testing. Identify the environment (e.g., borated water at pH 9, deionized water, tap water) and test temperature for any plant-specific head loss or transport tests. Discuss how any differences between these test environments and your plant containment pool conditions could affect the behavior of chemical surrogates. Discuss the criteria that will be used to demonstrate that chemical surrogates produced for testing (e.g., head loss, flume) behave in a similar manner physically and chemically as in the ICET environment and plant containment pool environment.
12. For your plant-specific environment, provide the maximum projected head loss resulting from chemical effects (a) within the first day following a LOCA, and (b) during the entire ECCS recirculation mission time. If the response to this question will be based on testing that is either planned or in progress, provide an estimated date for providing this information to the NRC.

### **ICET 1 and ICET 5 Plants**

13. (Not applicable).

### **Trisodium Phosphate Plants**

14. Given the results from the ICET #3 tests (Agencywide Document Access and Management System (ADAMS) Accession No. ML053040533) and NRC-sponsored head loss tests (Information Notice 2005-26 and Supplement 1), estimate the concentration of dissolved calcium that would exist in your containment pool from all containment sources (e.g., concrete and materials such as calcium silicate, Marinite™, mineral wool, kaylo) following a LBLOCA and discuss any ramifications related to the evaluation of chemical effects and downstream effects.
15. (Not applicable).
16. (Not applicable).

### **Additional Chemical Effects Questions**

17. (Not applicable).
18. (Not applicable).
19. (Not applicable).
20. (Not applicable).
21. (Not applicable).
22. (Not applicable).
23. (Not applicable).
24. (Not applicable).

### **Coatings**

#### Generic - All Plants

25. Describe how your coatings assessment was used to identify degraded qualified/acceptable coatings and determine the amount of debris that will result from these coatings. This should include how the assessment technique(s) demonstrates that qualified/acceptable coatings remain in compliance with plant licensing requirements for design basis accident (DBA) performance. If current examination techniques cannot demonstrate the coatings' ability to meet plant licensing requirements for DBA performance, licensees should describe an augmented testing and inspection program that provides assurance that the qualified/acceptable coatings continue to meet DBA performance requirements. Alternatively, assume all containment coatings fail and describe the potential for this debris to transport to the sump.

Plant Specific

26. (Not applicable).
27. (Not applicable).
28. (Not applicable).
29. Your GL response indicates that you may pursue a reduction in the radius of the zone of influence (ZOI) for coatings. Identify the radius of the coatings ZOI that will be used for your final analysis. In addition, provide the test methodology and data used to support your proposed ZOI. Provide justification regarding how the test conditions simulate or correlate to actual plant conditions and will ensure representative or conservative treatment in the amounts of coatings' debris generated by the interaction of coatings and a two-phase jet. Identify all instances where the testing or specimens used deviate from actual plant conditions (i.e., irradiation of actual coatings vice samples, aging differences, etc.). Provide justification regarding how these deviations are accounted for with the test demonstrating the proposed ZOI.
30. The NRC staff's safety evaluation (SE) addresses two distinct scenarios for formation of a fiber bed on the sump screen surface. For a thin bed case, the SE states that all coatings debris should be treated as particulate and assumes 100% transport to the sump screen. For the case in which no thin bed is formed, the staff's SE states that the coatings debris should be sized based on plant-specific analyses for debris generated from within the ZOI and from outside the ZOI, or that a default chip size equivalent to the area of the sump screen openings should be used (Section 3.4.3.6). Describe how your coatings' debris characteristics are modeled to account for your plant-specific fiber bed (i.e. thin bed or no thin bed). If your analysis considers both a thin bed and a non-thin bed case, discuss the coatings' debris characteristics assumed for each case. If your analysis deviates from the coatings' debris characteristics described in the staff-approved methodology, provide justification to support your assumptions.
31. Your submittal indicated that you had taken samples for latent debris in your containment, but did not provide any details regarding the number, type, and location of samples. Please provide these details.
32. Your submittal did not provide details regarding the characterization of latent debris found in your containment as outlined in the NRC SE. Please provide these details.
33. How will your containment cleanliness and foreign material exclusion (FME) programs assure that latent debris in containment will be controlled and monitored to be maintained below the amounts and characterization assumed in the ECCS strainer design? In particular, what is planned for areas/components that are normally inaccessible or not normally cleaned (containment crane rails, cable trays, main steam/feedwater piping, tops of steam generators, etc.)?
34. Will latent debris sampling become an ongoing program?
35. You indicated that you would be evaluating downstream effects in accordance with WCAP 16406-P. The NRC is currently involved in discussions with the Westinghouse Owner's Group (WOG) to address questions/concerns regarding this WCAP on a

generic basis, and some of these discussions may resolve issues related to your particular station. The following issues have the potential for generic resolution; however, if a generic resolution cannot be obtained, plant-specific resolution will be required. As such, formal RAIs will not be issued on these topics at this time, but may be needed in the future. It is expected that your final evaluation response will specifically address those portions of the WCAP used, their applicability, and exceptions taken to the WCAP. For your information, topics under ongoing discussion include:

- a. Wear rates of pump-wetted materials and the effect of wear on component operation
  - b. Settling of debris in low flow areas downstream of the strainer or credit for filtering leading to a change in fluid composition
  - c. Volume of debris injected into the reactor vessel and core region
  - d. Debris types and properties
  - e. Contribution of in-vessel velocity profile to the formation of a debris bed or clog
  - f. Fluid and metal component temperature impact
  - g. Gravitational and temperature gradients
  - h. Debris and boron precipitation effects
  - i. ECCS injection paths
  - j. Core bypass design features
  - k. Radiation and chemical considerations
  - l. Debris adhesion to solid surfaces
  - m. Thermodynamic properties of coolant
14. Your response to GL 2004-02 question (d) (viii) indicated that an active strainer design will not be used, but does not mention any consideration of any other active approaches (i.e., backflushing). Was an active approach considered as a potential strategy or backup for addressing any issues?
  15. The NRC staff's SE discusses a "systematic approach" to the break selection process where an initial break location is selected at a convenient location (such as the terminal end of the piping) and break locations would be evaluated at 5-foot intervals in order to evaluate all break locations. For each break location, all phases of the accident scenario are evaluated. It is not clear that you have applied such an approach. Please discuss the limiting break locations evaluated and how they were selected.
  16. Were secondary side breaks (e.g., main steam, feedwater) considered in the break selection analyses? Would these breaks rely on ECCS sump recirculation?
  17. The staff SE refers to Regulatory Guide 1.82 which lists considerations for determining the limiting break location (staff position 1.3.2.3). Please discuss how these considerations were evaluated as part of the San Onofre break selection analyses.
  18. You assumed a 4D ZOI for the mineral wool/stainless steel cassette insulation system at San Onofre and states that this is conservative because the 2D ZOI used for reflective metallic insulation (RMI) was doubled. Please discuss the technical basis for concluding that a 4D ZOI for this insulation system is adequate, include reference to applicable testing performed to determine the ZOI for the RMI and mineral wool insulations.

19. You refer to hydraulic and material properties testing of a mineral wool sample from another utility's plant for mineral wool debris characteristics, and states that scanning electron microscopy (SEM) will be used to confirm that San Onofre's mineral wool is identical to that tested. Please discuss the debris characteristics assumed for mineral wool in your analyses and provide the results of the SEM analysis which justify the application of the hydraulic and material properties testing to San Onofre-specific material.
20. Was the baseline guidance of 60% small fines and 40% large pieces followed for the characterization of mineral wool or other fibrous insulation debris that is present? If not, please provide a quantitative description of the characterization used for these fibrous materials.
21. The explanation that debris erosion should effectively cease after 24 hours is not clear to the NRC staff. The September 2005 response to GL 2004-02 indicates that test data (presumably from the staff's SE on the Nuclear Energy Institute guidance report) shows erosion as mainly due to loosely attached pieces of fiber breaking off of larger pieces, concluding that erosion should, therefore, taper off after approximately 24 hours. It is not clear to the NRC staff that this conclusion is actually supported by the test data, since (1) Appendix III to the staff's SE indicates that the accumulation of eroded debris tended to hold at a somewhat sustainable rate, and (2) the test durations were only in the range of 3 - 5 hours. Please provide additional information and analysis to demonstrate that the overall treatment of mineral wool debris characterization and transport is conservative. Please consider the contribution of containment sprays to debris erosion, and note at what point or timeframe during the accident recovery sprays are likely to be terminated.
22. What assumptions were made concerning the debris characterization for the various types of coatings that would be assumed to fail due to interaction with the containment environment (i.e., unqualified and degraded qualified coatings)? Were these coatings assumed to become particulate or chips? What size distributions were assumed?
23. Has debris settling upstream of the sump strainer (i.e., the near-field effect) been credited or will it be credited in testing used to support the sizing or analytical design basis of the proposed replacement strainers? In the case that settling was credited for either of these purposes, estimate the fraction of debris that settled and describe the analyses that were performed to correlate the scaled flow conditions and any surrogate debris in the test flume with the actual flow conditions and debris types in the plant's containment pool.
24. Are there any vents or other penetrations through the strainer control surfaces which connect the volume internal to the strainer to the containment atmosphere above the containment minimum water level? In this case, dependent upon the containment pool height and strainer and sump geometries, the presence of the vent line or penetration could prevent a water seal over the entire strainer surface from ever forming; or else this seal could be lost once the head loss across the debris bed exceeds a certain criterion, such as the submergence depth of the vent line or penetration. According to Appendix A to Regulatory Guide 1.82, Revision 3, without a water seal across the entire

strainer surface, the strainer should not be considered to be “fully submerged.” Therefore, if applicable, explain what sump strainer failure criteria are being applied for the “vented sump” scenario described above.

25. What is the basis for concluding that the refueling cavity drain(s) would not become blocked with debris? What are the potential types and characteristics of debris that could reach these drains? In particular, could large pieces of debris be blown into the upper containment by pipe breaks occurring in the lower containment, and subsequently drop into the cavity? In the case that large pieces of debris could reach the cavity, are trash racks or interceptors present to prevent drain blockage? In the case that partial/total blockage of the drains might occur, do water hold-up calculations used in the computation of NPSH margin account for the lost or held-up water resulting from debris blockage?
26. What is the minimum strainer submergence during the postulated LOCA? At the time that the re-circulation starts, most of the strainer surface is expected to be clean, and the strainer surface close to the pump suction line may experience higher fluid flow than the rest of the strainer. Has any analysis been done to evaluate the possibility of vortex formation close to the pump suction line and possible air ingestion into the ECCS pumps? In addition, has any analysis or test been performed to evaluate the possible accumulation of buoyant debris on top of the strainer, which may cause the formation of an air flow path directly through the strainer surface and reduce the effectiveness of the strainer?
27. The September 2005 GL response indicated that your debris transport analysis included modeling of fiberglass debris erosion, with an assumption that erosion would taper off after 24 hours. Please explain the basis for this assumption.