

UNITED STATES NUCLEAR REGULATORY COMMISSION ADVISORY COMMITTEE ON REACTOR SAFEGUARDS WASHINGTON, D.C. 20555-0001

April 22, 2003

MEMORANDUM TO: William Shack, Vice Chairman, Materials and Metallurgy Subcommittee

FROM: Ramin Assa, Senior Staff Engineer Technical Support Staff

1-1000

SUBJECT: CERTIFICATION OF THE MINUTES OF THE ACRS SUBCOMMITTEE MEETING ON MATERIALS AND METALLURGY - FEBRUARY 5, 2003, ROCKVILLE, MARYLAND

I hereby certify that, to the best of my knowledge and belief, the Minutes of the subject meeting

issued April 22, 2003, are an accurate record of the proceedings for that meeting.

W. Shack, Vice Chairman

4/23/03

Date



UNITED STATES NUCLEAR REGULATORY COMMISSION ADVISORY COMMITTEE ON REACTOR SAFEGUARDS WASHINGTON, D.C. 20555-0001

April 23, 2003

MEMORANDUM TO: ACRS Members

-. n. Ant FROM: Ramin Assa, Senior Staff Engineer **Technical Support Staff**

SUBJECT: CERTIFIED MINUTES OF THE ACRS SUBCOMMITTEE MEETING ON MATERIALS AND METALLURGY - FEBRUARY 5, 2003, ROCKVILLE, MARYLAND

The minutes of the subject meeting, issued on April 22, 2003, have been certified as the

official record of the proceedings of that meeting. A copy of the certified minutes is attached.

Attachment: As stated

- cc: J. Larkins
 - S. Bahadur
 - R. Savio
 - H. Larson
 - S. Duraiswamy
 - S. Banerjee
 - F. Moody
 - V. Schrock
 - ACRS Staff Engineers

CERTIFIEID BY: W. Shack

Certified on: April 23, 2003

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS MINUTES OF ACRS SUBCOMMITTEE MEETING ON MATERIALS AND METALLURGY FEBRUARY 5, 2003 ROCKVILLE, MD

INTRODUCTION

The ACRS Subcommittee on Materials and Metallurgy held a meeting on February 5, 2003, at 11545 Rockville Pike, Rockville, Maryland, in Room T-2B3. The purpose of the meeting was to hold discussions with representatives of the Office of Nuclear Regulatory Research (RES), relating to technical basis for revisions of the pressurized thermal shock (PTS) screening criteria in the PTS rule. Mr. Ramin Assa was the cognizant ACRS staff engineer for this meeting. The meeting was convened at 8:30 a.m. and adjourned at 4:50 p.m. on the same day.

PARTICIPANTS:

<u>ACRS</u>

W. Shack, Vice Chairman

- M. Bonaca
- P. Ford
- T. Kress
- G. Leitch

NRC Staff

- D. Bessette E. Hackett
- M. Kirk
- M. Mayfield

<u>NRC Contractor</u> A. Kolaczkowski, SAIC V. Ransom

- S. Rosen
- G. Wallis
- S. Banerjee, Consultant
- J. Rosenthal N. Siu

There were no written comments or requests for time to make oral statements received from members of the public. A list of meeting attendees is available in the ACRS office files.

INTRODUCTION

Dr. William Shack, Vice Chairman of the ACRS Materials and Metallurgy Subcommittee, presiding, convened the meeting and stated that the purpose of the meeting was to review staff's draft NUREG report on the technical basis for revising the PTS rule (10 CFR 50.61.) Dr. Shack then called upon NRC staff to begin.

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NRC STAFF PRESENTATION

Introduction: Mr. Michael Mayfield, RES

Mr. Mayfield started his opening remarks by saying that the PTS Project has been a major undertaking for RES. He then introduced Mr. Siu and asked him to begin with the presentation.

<u>OVERVIEW OF PTS RE-EVALUATION PROJECT</u> - Messrs. Nathan Siu, Edward Hackett, and Mark Kirk, RES

Mr. Siu stated that this project has been supported by industry, specifically the Materials Reliability Program (MRP) of the Electric Power Research Institute (EPRI.)

Dr. Wallis noted that the draft NUREG report appeared to have been written by different people and was not well integrated. Mr. Siu acknowledged this point.

Dr. Ford questioned whether a thorough peer review was conducted as stated in the report's cover letter. Mr. Hackett stated that this activity was in progress and expected to be completed in 2003.

Drs. Ransom and Wallis pointed out that the NUREG does not provide a clear relationship between itself and referenced reports by University of Maryland and Oregon State University (OSU.) Mr. Bessette stated that the results of the OSU report were implicit in the NUREG.

Mr. Kirk noted that the objectives of the meeting were to review the draft NUREG and show a strong case to support rulemaking. Results of the plant-specific evaluation of two of the most embrittled plants in the fleet had shown that these plants had more margin against failure by PTS than previously believed.

Dr. Wallis stated that figure 1.1 in the report was very confusing. Mr. Kirk acknowledged and stated that the two sigma margins were misrepresented. Mr. Hackett added that there has been a fair amount of confusion over this issue over the years and RES' goal was to clarify this issue during the meeting. Mr. Wallis reiterated the need for peer review to identify and correct errors before issuance of the final report. Mr. Kirk acknowledged that the project was not over yet and needed additional reviews, including a response from Office of Nuclear Reactor Regulation (NRR).

Dr. Ford raised the issue of plants that were approaching RT_{PTS} screening criteria and were interested in applying for license renewal. If the current 10 CFR 50.61 rule is not changed, these plants could not easily request a license extension. According to Mr. Hackett, Palisades Plant is the closest to and is projected to reach the screening criteria around 2011.

Mr. Rosen noted that the report only provides the technical basis for a change to the current PTS rule and asked about the criteria used for deciding whether to proceed with a rule change. Mr. Hackett responded that a petition for rulemaking from the industry could initiate this activity but the allocation of resources would the determining factor.

ANALYSIS APPROACH - Mr. Kirk, RES

Mr. Kirk presented a brief background of the PTS project. The licensee for Yankee Rowe power plant had predicted that the vessel embrittlement would reach the current PTS screening limit before the end of the plant's licensing life (EOL) and had attempted to follow the provisions of Regulatory Guide (RG) 1.154 to support operations at embrittlement levels greater than those implied by the screening criteria in 10 CFR 50.61. However, their efforts were not successful and the plant was permanently shut down in 1991. Following the difficulties with implementing RG 1.154, the Commission directed the staff to revise the RG and associated rule.

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Since the original PTS rule was issued, improvements in Probabilistic Risk Assessment (PRA) analysis, thermal-hydraulics studies, and probabilistic fracture mechanics calculations, suggest that the current rule may be overly conservative. In the analysis supporting the development of the original rule, it was shown that a shift in mean value of the fracture toughness transition temperature to 210° F corresponds to yearly through-wall cracking frequency of 5X10⁻⁶. A mean transition temperature of 201° F corresponds to a transition temperature of 270° F computed following RG 1. 99, Rev. 2 because the RG 1.99, Rev. 2 temperature includes a margin term. The figure on page six of the handouts represented the distribution of plants that were close to the current screening criteria. Mr. Kirk stated that plants get closer to the RT_{PTS} limit by about one degree Fahrenheit per year of operation.

The staff selected Calvert Cliff, Oconee, Beaver Valley, and Palisades for plant-specific studies. These plants represent each of the major pressurized water reactor (PWR) manufacturers. Two of the plants were projected to be the closest to the current PTS screening criteria limit at EOL.

The staff's estimate of the through-wall cracking frequency starts with an events sequence analysis. This analysis defines both the combination of events (scenario) that can lead to a PTS challenge to the vessel and the frequency of such events. The thermal-hydraulic conditions associated with each scenario are determined using the RELAP Code. These analyses give the temporal variations of pressure, temperature, and heat transfer coefficient acting on the embrittled vessel. Probabilistic fracture mechanics analyses, based on linear elastic fracture mechanics techniques, were performed using the FAVOR Code. These analyses calculate the conditional probabilities with which through-wall cracks will occur. These conditional probabilities are multiplied by the sequence frequencies to obtain an estimate of the yearly through-wall cracking frequency.

The probabilistic fracture mechanics analysis treats the pressure, temperature, and heat transfer coefficient variation with time for each scenario deterministically. FAVOR takes as input the pressure, temperature, and heat transfer coefficient values versus time at the vessel surface, calculates the heat conduction in the vessel, and computes the resulting thermal stresses. The stresses are then used to compute the driving force for fracture. At the same time, FAVOR calculates a distribution of fracture toughness of material, which is dependent upon the temperature, the fluence, and embrittlement characteristics. Comparison of the applied driving force with the toughness distribution gives probability of fracture.

PRA ANALYSIS - Mr. Kolaczkowski, SAIC

Mr. Kolaczkowski provided an overview of the PRA modeling approach and the plant specific PRA models. He stated that the Oconee PRA model is the most complete one, relative to over cooling scenarios. The model identified one hundred eighty-one thousand two hundred fifty eight over-cooling sequences. The initiating event frequencies and equipment failure data in the model were based on industry generic data. The human reliability analysis (HRA) was initially performed by NRC contractors. The Beaver Valley model was the second one prepared by the staff and was simplified based on results from the Oconee analysis which showed that some scenarios were relatively unimportant from a through-wall crack frequency perspective. Palisades was the last model prepared by the staff. Because the Palisades IPE included PTS scenarios, the staff started with a pre-existing model and modified it. Unlike the other two cases, the licencee was the keeper of the model.

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The results of the PRA showed that medium and large LOCAs are bigger contributors to PTS than previously taken into account in the 1980s when developing the original PTS rule. Recent analysis also showed that the thermal stress (or temperature) is more dominant than pressure.

During the meeting, there were considerable discussions between the Subcommittee members and the staff regarding operator action and assigning probability values to them. Mr. Kolaczkowski stated that for some over-cooling scenarios operator actions play a key role, either by mitigating or exacerbating the event. However, during a LOCA, which is the dominant event, operator actions have little impact. Thus, in PTS the uncertainties associated with operator actions have relatively little impact on the overall uncertainty in the vessel failure frequency.

THERMAL HYDRAULIC ANALYSIS - Mr. Bessettee, RES

Mr. Bessette stated that the staff used RELAP 5/MOD 3.2.2 gamma Code to generate downcomer temperature, system pressure, and heat transfer coefficient at the inside of the vessel wall. These results were then used as input to FAVOR Code. Mr. Bessette presented a comparison between RELAP predicted temperatures and results of ROSA (Westinghouse) and MIST (Babcock & Wilcox) experiments. Members of the Subcommittee questioned the assessment of thermal hydraulic uncertainties, and their impact on the rates of change in the temperatures feeding into the FAVOR Code and asked the staff to present these results clearly and in more detail in the future.

PROBABILISTIC FRACTURE MECHANICS - Mr. Kirk, RES

The pressure, temperature, and heat transfer coefficient are input to an embrittlement and crack initiation model. Other inputs to the model include flaw distribution and their locations, orientation, material properties, composition, and fluence variations around the vessel. The model then calculates a yearly frequency of through-wall cracking. The flaw distribution data came from a variety of sources. According to Mr. Kirk, most of the big flaws (95 to 98 percent) are in the welds. Inspections have revealed that most of these flaws are fusion line flaws. This observation helps in the determination of the flaw orientation.

Generic Letter 92-01 required all licensees to report fluence level and identify limiting materials in terms of RT_{NDT} , and characterize the embrittlement in terms of RT_{NDT} . In addition, confirmatory experimental data were derived from tests at the Oak Ridge National Laboratory and other locations. The staff has recognized that RT_{NDT} is not a precise representation of toughness changes under irradiation. However, even if better characterization of embrittlement were available for all materials of interest, there would still be aleatory uncertainty in the toughness. They developed a model describing both the epistemic and aleatory uncertainties in RT_{NDT} and the aleatory nature of toughness, for both crack arrest and crack initiation. Dr. Wallis noted that the discussion of these uncertainties needed better clarification in the report.

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Dr. Wallis asked about the effects of transients and flaw distributions in the stainless steel liner. Mr. Kirk responded that residual stress distribution due to the weld overlay and stresses caused by the differential thermal expansion of the stainless steel relative to the ferritic steel were incorporated in the analysis.

PLANT SPECIFIC STUDIES - Mr. Kirk, RES

Mr. Kirk stated that overall LOCAs are the dominant contributors to PTS failures in PWRs. There is at least three orders of magnitude uncertainty in through-wall cracking frequencies. Two thirds of the contribution come from the uncertainty in the LOCA frequencies and the remaining from uncertainties in the flaw distributions. The distributions are highly skewed and the mean and 95th percentiles are almost equal. Operator action does not play a significant role during most LOCAs because there is little an operator can do in response to it. However, for B&W plants operator action plays a more critical role in response to stuck open primary side valve scenarios. From a materials perceptive, the axial weld cracks and weld toughness or the plate properties dominate the RT_{NDT}.

Dr. Ford questioned how could the results of this draft NUREG be applicable to all PWRs based on analysis of only three plants. Mr. Kirk responded that these plants were selected and ranked in terms of irradiation susceptibility and that because the challenge were dominated by LOCA events there is a high degree of consistency in operational challenge among plants.

ACCEPTANCE CRITERIA - Mr. Siu, RES

Mr. Siu described the reactor vessel failure frequency acceptance criteria development process. The strategy for developing the criteria was to be consistent with the original intent of the PTS rule by keeping the risk level low and keeping the relative contribution of PTS risk small compared to the risks associated with other sources. The staff believes that the reactor vessel failure frequency (RVFF) should be defined in terms of through-wall crack frequency rather than the frequency of crack initiation.

The key question was whether there is a margin between the occurrence of a through-wall crack and core damage and large early release associated with a PTS scenario. The staff urged that the challenge to the containment of PTS events is not exceptionally severe as compared to other accident scenarios. The important factor is the relatively low coolant temperature during a PTS events.

Mr. Bessette described several PTS transient scenarios. One scenario starts with a medium size LOCA, followed by a vessel failure in 1000 seconds. The FAVOR calculations and results of the pilot studies showed that the containment failure is unlikely and independent of a PTS event. Other scenarios also show that, overall, there is adequate margin between the occurrence of a PTS induced reactor vessel failure and large early release. For example, the reaction forces resulting from a vessel break are not worse than those analyzed for a cold leg break.

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Mr. Siu concluded that the containment pressurization is likely to be less than a design basis LOCA and that choosing reactor vessel failure frequency criterion to be 10⁻⁶ would be consistent with the intent of the original PTS rule.

PTS SCREENING LIMIT - Mr. Kirk, RES

Mr. Kirk stated that the severity of PTS challenges is remarkably similar among the plants studied, and, the frequency of challenge is also fairly similar but with some greater plant dependencies. From a materials viewpoint, axial weld material and flaws dominate the through-wall cracking frequency and establish the relationship between the embrittlement metric and through-wall cracking frequency. Mr. Kirk described the RT_{NDT} screening criteria graph which gives the relationship between the RT_{NDT} and mean through-wall cracking frequency. The horizontal axis is the ASME RT_{NDT} plus a shift due to irradiation calculated from the Eason formula. The vertical axis is derived from FAVOR calculations and incorporates all the complexities of uncertainties in material properties, thermal-hydraulics, and event frequency.

Using the graph, and taking the reactor vessel failure frequency criterion of 10^{-6} , the resulting screening limit RT_{NDT} comes out to be 290°F. However, RT_{NDT} is not the same as RT_{PTS} . Calculated by Regulatory Guide 1.99, Rev. 2, RT_{NDT} is about 90°F less than RT_{PTS} . This suggests that a 80°F to 110°F increase of the current screening limit is possible.

CONCLUSIONS AND RECOMMENDATIONS

The staff stated that the purpose of this analysis was to show that a PTS event was unlikely and therefore the NRC could raise the criteria to allow the plants to run for a longer time. RES has forwarded the draft NUREG to the Office of Nuclear Reactor Regulation and believes that it can support revising the PTS rule. The staff highlighted that work on this analysis was still ongoing. The Subcommittee noted that the analysis and its conclusions apply to all PWRs. They also commented that the analysis and the draft report needed additional work and strongly recommended a peer review. The staff agreed that the draft report was not final and additional work was necessary. They also committee to present the information in plain language and clearer. The Subcommittee encouraged the staff to proceed with the rulemaking.

STAFF COMMITMENTS

- 1. The staff committed to perform a thermal hydraulic uncertainty analysis and evaluate the temperature distribution in the downcomer region.
- 2. The staff committed to perform additional FAVOR runs in terms of sensitivity studies.

4. The staff committed to revise the draft NUREG and perform a comprehensive peer review.

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SUBCOMMITTEE DECISION

The Subcommittee decided prepare a letter regarding this matter and submit to the full Committee for consideration. The staff will brief the full Committee at the February 2003 ACRS meeting.

FOLLOW-UP ACTIONS

None.

PRESENTATION SLIDES AND HANDOUTS PROVIDED DURING THE MEETING

The presentation slides and handouts used during the meeting are available in the ACRS office files and as attachments to the transcript which will be made available in ADAMS.

BACKGROUND MATERIAL PROVIDED TO THE SUBCOMMITTEE

- 1. "Technical Basis for Revision of the Pressurized Thermal Shock (PTS) Screening Criteria in the PTS Rule" (10 CFR 50.61), December 31, 2002
- 2. Advisory Committee on Reactor Safeguards (ACRS) Letter to William Travers, "Reevaluation of the Technical Basis for the Pressurized Thermal Shock Rule", February 14, 2002.
- 3. ACRS Letter to William Travers, "Risk Metrics and Criteria for Reevaluation the Technical Basis Of the Pressurized Shock Rule", July 18, 2002.
- 4. William Travers letter to ACRS, "Risk Metrics and Criteria for Reevaluation the Technical Basis Of the Pressurized Shock Rule", September 3, 2002.

NOTE: Additional details of this meeting can be obtained from a transcript of this meeting available in the NRC Public Document Room, One White Flint North, 11555 Rockville Pike, Rockville, MD, (301) 415-7000, downloading or view on the Internet at <u>http://www.nrc.gov/reading-rm/doc-collections/acrs/</u> can be purchased from Neal R. Gross and Co., 1323 Rhode Island Avenue, NW, Washington, D.C. 20005, (202) 234-4433 (voice), (202) 387-7330 (fax), <u>nrgross@nealgross.com</u> (e-mail).

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS MATERIALS AND METALLURGY SUBCOMMITTEE MEETING REEVALUATING THE TECHNICAL BASIS OF THE PRESSURIZED THERMAL SHOCK (PTS) RULE FEBRUARY 5, 2003, ROCKVILLE, MARYLAND Contact: Richard Savio (301-415-7363, rps1@nrc.gov) Barrin Assa (301-415-6885, rra@nrc.gov)									
	Topics	Presenters	Time						
١.	Opening Remarks	W. Shack, ACRS	8:30-8:35 a.m.						
II.	PTS Re-evaluation Project Introduction	M. Mayfield, RES	8:35-8:50 a.m.						
III.	PTS Project Overview, Background	M. Kirk	8:50-9:35 a.m.						
X	Significance of RELAP differences w/ experiments (assessment results)	D. Bessette	9:35-9:55 a.m.						
	BREAK	10:05	9:55-10:10 a.m.						
IV.	Plant Specific Results (Oconee-1, Beaver Valley-1, Palisades) Thermal-Hydraulic characteristics of dominant transients. Uncertainty results	M. Kirk D. Bessette R. Woods	10:10- 12:00 a.m . 12:25 ⁻ PM						
	LUNCH		12:00-1:00 p.m.						
Ser (Plant Specific Results (Continued), Applicability Beyond the study plants Generalization and external events	A. Kolaczkowski, SAIC D. Whitehead, SNL M. Kirk R. Woods	⊭so _ _1:00 -2:10						
V.	Risk-Informed Reactor Vessel Failure Frequency Acceptance Criteria Post PTS Vessel Failure considerations (including addressing comments of ACRS) Results of T-H analyses	N. Siu D. Bessette	2:10-3:10						
	BREAK		3:10-3:25 p.m.						
VI.	PTS RT _{NDT} based screening limit	M. Kirk	3:25-3:55						
VII.	Overall summary and conclusions	M. Kirk, E. Hackett	3:55-4: 55-3 ¢						
VIII.	Subcommittee discussion		4:55-5410p.m.						
IX.	Adjourn		€.10 p.m.						
 NOTE: Presentation time should not exceed 50 percent of the total time allocated for specific item. The remaining 50 percent of the time is reserved for discussion. 25 copies of the presentation materials to be provided to the Subcommittee 									

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS SUBCOMMITTEE MEETING ON MATERIALS AND METALLURGY

FEBRUARY 5, 2003 Today's Date

NRC STAFF PLEASE SIGN IN BELOW

PLEASE PRINT

NAME

NATHAN SIL SHAHMAUK sentha Alg Hhow A. M. Sur Basen ance Krm Kent Welter MARIC KIRK

NRC ORGANIZATION RES / DEA A/PRAB RES / DET / MEB RES / DRAA / PRAB RES / DSARS / SMSAB NRR / DE / EmcB RES / DSARE / SMSAB RES / DSARE / SMSAB RES / DSARE / SMSAB AES / DET / MEB RES / DET / MEB

"Auxiliary Feedwater System," to better reflect the four train auxiliary feedwater (AFW) system design at STP Specifically, the changes specify the same allowed outage time (AOT) for any one inoperable motor-driven pump, regardless of train. The amendments also extend the AOT for one inoperable motor-driven pump from 72 hours to 28 days. A sentence has also been added to Action d. stating that Limiting Condition for Operation (LCO) 3.0.3 and all other LCO actions requiring Mode changes are suspended until one of the four inoperable AFW pumps is restored to operable status. There is also an administrative change in the wording of the LCO to clarify that there are only

four AFW pumps in each STP unit. Date of issuance: December 31, 2002. Effective date: December 31, 2002. Amendment Nos.: Unit 1-146; Unit 2-134

Facility Operating License Nos. NPF-76 and NPF-80: The amendments revised the Technical Specifications.

Date of initial notice in *Federal* Register: January 22, 2002 (67 FR 2930). The supplement provided additional information that clarified the application. did not expand the scope as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination.

The Commission's related evaluation of the amendments is contained in a Safety Evaluation dated December 31, 2002

No significant hazards consideration comments received: No.

TXU Generation Company LP, Docket Nos. 50-445 and 50-446, Comanche Peak Steam Electric Station, Unit Nos. 1 and 2, Somervell County, Texas

Date of amendment request: April 8, 2002

Brief description of amendments: The amendments revise Technical Specification (TS) 3.4.16, "RCS [Reactor Coolant System] Specific Activity," to lower the Limiting Condition For Operation and associated Surveillance **Requirements for Dose Equivalent** lodine-131 in the RCS from a specific activity of 1.0 µCi/gm to 0.45 µCi/gm.

Date of issuance: January 6, 2003.

Effective date: As of the date of issuance and shall be implemented within 60 days from the date of issuance

Amendment Nos.: 102 and 102. Facility Operating License Nos. NPF-87 and NPF-89: The amendments revised the Technical Specifications.

Date of initial notice in **Federal** Register: June 11, 2002 (67 FR 40026). The Commission's related evaluation of the amendments is contained in a Safety Evaluation dated January 6, 2003. No significant hazards consideration comments received: No.

Virginia Electric and Power Company, Docket No. 50-338, North Anna Power Station, Unit 1, Louisa County, Virginia

Date of application for amendment: December 7, 2001, as supplemented by letters dated June 28 and July 25, 2002.

Brief description of amendment: This amendment permits a one-time extension of the current 10-year Title 10 of the Code of Federal Regulations Part 50, Appendix J, Option B, Type A test interval from April 3, 2003, to April 2, 2008.

Date of issuance: December 31, 2002. Effective date: As of the date of issuance and shall be implemented within 30 days from the date of issuance.

Amendment No.: 234.

Facility Operating License No. NPF-4: Amendment changes the Technical Specifications.

Date of initial notice in Federal Register: April 30, 2002 (67 FR 21295). The supplemental letters dated June 28 and July 25, 2002, contained clarifying information only and did not change the proposed no significant hazards consideration determination or expand the scope of the initial application.

The Commission's related evaluation of the amendments is contained in a Safety Evaluation dated December 31, 2002

No significant hazards consideration comments received: No.

For the Nuclear Regulatory Commission. Dated at Rockville, Maryland, this 13th day of January 2003.

John A. Zwolinski,

Director, Division of Licensing Project Management, Office of Nuclear Reactor Regulation.

[FR Doc. 03-1161 Filed 1-17-03; 8:45 am] BILLING CODE 7590-01-P

NUCLEAR REGULATORY COMMISSION

Advisory Committee on Reactor Safeguards Subcommittee Meeting on Planning and Procedures; Notice of Meeting

The ACRS Subcommittee on Planning and Procedures will hold a meeting on Advisory Committee on Reactor February 5, 2003, Room T-2B1, 11545 Rockville Pike, Rockville, Maryland.

The entire meeting will be open to public attendance, with the exception of a portion that may be closed pursuant to 5 U.S.C. 552b(c) (2) and (6) to discuss organizational and personnel matters

that relate solely to internal personnel rules and practices of ACRS, and information the release of which would constitute a clearly unwarranted invasion of personal privacy.

The agenda for the subject meeting shall be as follows:

Wednesday, February 5, 2003-1 p.m. until the conclusion of business

The Subcommittee will discuss proposed ACRS activities and related matters. The purpose of this meeting is to gather information, analyze relevant issues and facts, and formulate proposed positions and actions, as appropriate, for deliberation by the full Committee.

Oral statements may be presented by members of the public with the concurrence of the Subcommittee Chairman: written statements will be accepted and made available to the Committee. Persons desiring to make oral statements should notify the Designated Federal Official named below five days prior to the meeting. if possible, so that appropriate arrangements can be made. Electronic recordings will be permitted only during those portions of the meeting that are open to the public.

Further information regarding topics to be discussed, the scheduling of sessions open to the public, whether the meeting has been canceled or rescheduled, and the Chairman's ruling on requests for the opportunity to present oral statements and the time allotted therefor can be obtained by contacting the Designated Federal Official, Mr. Sam Duraiswamy (telephone: 301/415-7364) between 7:30 a.m. and 4:15 p.m. (EST). Persons planning to attend this meeting are urged to contact the above named individual at least two working days prior to the meeting to be advised of any potential changes in the proposed agenda.

Dated: January 13, 2003.

Sher Bahadur,

Associate Director for Technical Support. ACRS/ACNW

[FR Doc. 03-1221 Filed 1-17-03; 8:45 am] BILLING CODE 7590-01-P

NUCLEAR REGULATORY COMMISSION

Safeguards Meeting of the ACRS Subcommittee on Materials and Metallurgy; Notice of Meeting

The ACRS Subcommittees on Materials and Metallurgy will hold a meeting on February 5, 2003, Room T-

2810

2B3, 11545 Rockville Pike, Rockville, Maryland.

The entire meeting will be open to public attendance.

The agenda for the subject meeting shall be as follows:

Wednesday, February 5, 2003—8:30 a.m. until the conclusion of business

The Subcommittee will meet with representatives of the NRC staff and discuss the risk metric and criteria that can be used for reevaluating the technical basis of the pressurized thermal shock (PTS) rule and the NRC staff's pilot plant studies. The purpose of this meeting is to gather information, analyze relevant issues and facts, and formulate proposed positions and actions, as appropriate, for deliberation by the full Committee.

Oral statements may be presented by members of the public with the concurrence of the Subcommittee Chairman: written statements will be accepted and made available to the Committee. Electronic recordings will be permitted only during those portions of the meeting that are open to the public. Persons desiring to make oral statements should notify the Designated Federal Official named below five days prior to the meeting, if possible, so that appropriate arrangements can be made.

During the initial portion of the meeting, the Subcommittee, along with any of its consultants who may be present, may exchange preliminary views regarding matters to be considered during the balance of the meeting.

The Subcommittee will then hear presentations by and hold discussions with representatives of the NRC staff, and other interested persons regarding this review.

Further information regarding topics to be discussed, whether the meeting has been canceled or rescheduled, and the Chairman's ruling on requests for the opportunity to present oral statements and the time allotted therefor can be obtained by contacting the Designated Federal Official, Dr. Richard P. Savio (telephone 301-415-7363) between 7:30 a.m. and 5 p.m. (EST). Persons planning to attend this meeting are urged to contact the above named individual at least two working days prior to the meeting to be advised of any potential changes in the proposed agenda.

Dated: January 14, 2003.

Sher Bahadur,

Associate Director for Technical Support, ACRS/ACNW.

[FR Doc. 03-1222 Filed 1-17-03; 8:45 am] BILLING CODE 7590-01-P

NUCLEAR REGULATORY COMMISSION

Peer Review Committee for Source Term Modeling; Notice of Meeting

The Peer Review Committee For Source Term Modeling will hold a closed meeting on January 28–29, 2003 at Sandia National Laboratories (SNL), Albuquerque, NM.

The entire meeting will be closed to public attendance to protect information classified as national security information pursuant to 5 U.S.C. 552b(c)(1) and as proprietary pursuant to 5 U.S.C. 552b(c)(4).

The agenda for the subject meeting shall be as follows:

Wednesday, January 28 and Thursday, January 29, 2003—8:30 a.m. until the conclusion of business

The Committee will review SNL activities and aid SNL in development of guidance documents on source terms that will assist the NRC in evaluations of the impact of specific terrorist activities targeted at a range of spent fuel storage casks and radioactive material transport packages including those for spent fuel.

Further information contact: Dr. Andrew L. Bates (telephone 301-415-1963) or Dr. Charles G. Interrante (telephone 301-415-3967) between 7:30 a.m. and 4:15 p.m. (EDT).

Dated: January 14, 2003.

Andrew L. Bates,

Advisory Committee Management Officer. [FR Doc. 03–1220 Filed 1–17–03; 8:45 am] BILLING CODE 7590–01–P

SECURITIES AND EXCHANGE COMMISSION

Sunshine Act Meeting

Notice is hereby given, pursuant to the provisions of the Government in the Sunshine Act, Pub. L. 94–409, that the Securities and Exchange Commission will hold the following meetings during the week of January 20, 2003. An Open Meeting will be held on Wednesday, January 22, 2003, at 10 a.m., in Room 1C30, the William O. Douglas Room, and a Closed Meeting will be held on Thursday, January 23, 2003, at 10 a.m. Commissioners, Counsel to the

Commissioners, Counsel to the Commissioners, the Secretary to the Commission, and recording secretaries will attend the Closed Meeting. Certain staff members who have an interest in the matters may also be present.

The General Counsel of the Commission, or his designee, has certified that, in his opinion, one or more of the exemptions set forth in 5 U.S.C. 552b(c)(3), (5), (7), (9)(B) and (10) and 17 CFR 200.402(a)(3), (5), (7), (9)(ii) and (10), permit consideration of the scheduled matters at the Closed Meeting.

The subject matter of the Open Meeting scheduled for Wednesday, January 22, 2003 will be:

1. The Commission will consider whether to adopt new rules 30a-3 and 30d-1 and amendments to rules 8b-15, 30a-1, 30a-2, 30b1-1, 30b1-3, and 30b2-1 under the Investment Company Act of 1940, amendments to rules 12b-25, 13a-15, and 15d-15 and Form 12b-25 under the Securities Exchange Act of 1934, amendments to Form N-SAR under the Exchange Act and the Investment Company Act, and new Form N-CSR under the Exchange Act and Investment Company Act. These new rules and form. and rule and form amendments, would require registered management investment companies to file certified shareholder reports on new Form N--CSR with the Commission, and would designate these certified shareholder reports as reports that are required under sections 13(a) and 15(d) of the Exchange Act and Section 30 of the Investment Company Act. A registered management investment company s principal executive and financial officers would be required to certify the information contained in its reports on Form N-CSR in the manner specified by Section 302 of the Sarbanes-Oxley Act of 2002. The amendments would also remove the requirement that Form N-SAR be certified by a registered investment company's principal executive and financial officers, and would provide that, for registered management investment companies, Form N-SAR would be filed under the Investment Company Act only. In addition, the amendments would implement Sections 406 and 407 of the Sarbanes-Oxlev Act by requiring a registered management investment company to provide disclosure on Form N-CSR or Form N-SAR, as applicable, regarding whether the investment company has adopted a code of ethics for the company's principal executive officer and senior financial officers, and whether the investment company has at least one "audit committee expert" serving on its audit committee, and if so, the name of the expert and whether the expert is independent of management.

2. The Commission will consider adopting rules to establish standards of professional conduct for attorneys who appear and practice before the Commission in any way in the representation of issuers. As proposed, the rules would require an attorney to report evidence of a material violation of securities laws, a material breach of fiduciary duty, or similar material violation by the issuer or by any officer, director, employee, or agent of the issuer to the issuer's chief legal officer or the chief executive officer of the company (or the equivalents); if they do not respond appropriately to the evidence, the rule would require the attorney to report the evidence to the issuer's audit committee, another committee of independent directors. or the full board of directors; if the directors do not respond appropriately, the rule would

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS SUBCOMMITTEE MEETING ON MATERIALS AND METALLURGY

FEBRUARY 5, 2003 Today's Date

ATTENDEES PLEASE SIGN IN BELOW

PLEASE PRINT

NAME
STAN ROSINSKI
Steve Byrne
BILL SERVER
ALAN KOLACZKOWSKI
Donnie Whitehead
Yung-Hsien Chang
W Arcrein
Robert Beatury
DON FLETCHER
TERRY DCKSon
Bob Hardies
Ken Yoon
Ron Gamble
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ATI CONSULTING
SAIC
Sandia National Labs.
UMD
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ISL
ISL
ORNL
Constellation Energy
Framatome ANP
Saitiex Coip

Reactor Vessel Failure Frequency (RVFF)

- RVFF criterion needed for two purposes:
 - Support definition of RPV embrittlement criterion
 - Provide acceptance criterion for safety analysis
- Current metric and criterion established in RG 1.154:

 $\mathbf{RVFF} \equiv \mathbf{TWCF}$

 $RVFF^* = 5 \times 10^{-6}/ry$

 Limited scope activity to revisit metric/criterion in light of recent risk-informed regulation initiatives



Task Activities

- Identification of options
- Scoping study of post-vessel failure accident progression
 - Qualitative evaluation of technical issues
 - Review of pilot plant calculations for T/H conditions
 - Limited calculations

Status reports and meetings

- SECY-02-0092 (5/10/02)
- ACRS (7/10/02), public meetings (10/17/02; 1/31/03)
- Chapter 5, draft NUREG (12/31/02)
- Focus on acceptability => activities are largely independent of plant-specific studies

RVFF Acceptance Criteria Principles in Developing and Evaluating Options

Consistency with intent of original rule

- Low risk level
- Low relative contribution
- Consistency with recent risk-informed initiatives
 - Risk metrics
 - Risk criteria
 - Consideration of defense-in-depth

RVFF Acceptance Criteria Options (SECY-02-0092)

Definition of RVFF

- RVFF = f(PTS-induced RPV through-wall crack)
- RVFF = f(PTS-induced crack initiation)
- RVFF acceptance limits
 - $RVFF^* = 5 \times 10^{-6}/ry$
 - RVFF* = 1 x 10⁻⁵/ry
 - $RVFF^* = 1 \times 10^{-6}/ry$

Post-SECY Discussions

- Budgeting process: focus effort on assessing RVFF for pilot plants
- ACRS Letter (7/18/02; ML0220406120)
 - **RVFF** should be based on considerations of LERF (and not CDF)
 - Current LERF surrogate goal is not proper starting point

"...source terms used to develop the current goal do not reflect the airoxidation phenomena that would be a likely outcome of a PTS event."

- Options:
 - ✓ Develop acceptance criterion from prompt fatality safety goal
 - ✓ Use a frequency-based approach to develop RVFF* to provide assurance that PTS-induced RPV failures are very unlikely
- ACRS' expectation: RVFF* will be substantially smaller than options proposed in SECY-02-0092

Definition of RVFF

It is appropriate to define RVFF as the frequency of through-wall cracks (TWCF)

- TWCF is a more direct indicator of risk than is the vessel cracking initiation frequency
- The current technology for predicting crack arrest is reasonably robust
 - Laboratory-scale experiments
 - Scaled-vessel experiments

Scoping Study - Key Questions

- Is a PTS-induced RPV failure likely to lead to melted fuel?
- Is a PTS-induced RPV failure likely to lead to a large, early release?
- Is the release spectrum (frequency-consequence) for PTS-induced large, early releases significantly worse than that associated with risk-significant, non-PTS-induced scenarios?

Scoping Study - Approach

- Refine SECY-02-0092 list of technical issues
- Develop accident progression event tree (APET) to support identification, representation and discussion of technical issues
- Evaluate current state of knowledge regarding technical issues
- Context for evaluations:
 - Focus on pilot plants; some consideration of plants addressed in generalization task
 - Whether/how PTS changes accident progression

Accident Progression Event Tree (APET)





Potential Sources of Dependence Between Top Events

- Plant systems
- RPV movement
- Fragments
- Fuel movement

Plant Conditions at RPV Failure

- Power available, cooling systems running (injection mode)
- LOCA events: RCS cooling, depressurizing
 - MLOCA RPV failure at ~15-30 min (40 EFPY)
 - LLOCA RPV failure at ~5-10 min (40 EFPY)
- Stuck-open SRV events: RCS at SRV setpoint RPV failure at ~60-120 min (40 EFPY)









VG 16

RPV TH Failure Analysis

- Scoping calculations performed using RELAP5/MOD3.3 of RPV failure for Calvert Cliffs
- Two transients analyzed
 - 4-inch surge line break
 - Stuck open pressurizer safety valves (2) that reclose at 6000s
- For each transient, two RPV failure modes analyzed
 - 12 ft² axial break (1 ft x 12 ft)
 - 360° circumferential break
- For each break, three break opening times analyzed
 - 0.01 s
 - 0.1 s
 - 1s
- Results compared to Design Basis LBLOCA

RPV TH Failure Analysis Circumferential Break Nodalization



VG 18

RPV TH Failure Analysis

Axial Break Nodalization



VG 19

Conditions at RPV Failure

Transient	Break Time (s)	Pressure (psi)	Downcomer Temperature (F)	Specific Enthalpy (Btu/lbm)
4-inch surge line break	2400	200	215 (saturated)	183
Stuck open SRV	8230	2400	355	327
LB LOCA	0	2250	545	543

Internal Pressure Differentials

Transient	Vessel Break		Core Barrel ∆P (psi)	Core ∆P (psi)	Downcomer ∆P (psi)	Duration
4-inch surge line break	Axial	10ms 1s	150 15	60 -10	150 25	12-30 ms 1 s
	Circ	10ms 1s	165 45	110 30	35 15	20-70 ms 1 s
Stuck open SRV	Axial	10ms 1s	1800 50	600 -10	1680 40	10-20 ms 130 ms
	Circ	10ms 1s	2140 240	1460 100	50 -15	10-20 ms 60 ms
LB LOCA	N/A	10ms 1s	1010 -170	240 -70	1110 -500	

Containment Pressure


Key Sequences



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Observations

- Accident energetics are more benign than those of some other scenarios previously studied (e.g., HPME)
- Containment pressurization likely to be less than design basis LOCA
- Blowdown forces on RPV and internals likely to be the same order of magnitude or bounded by DB LOCA
- Containment spray failure probability may decrease for PTS events (as compared with non-PTS risk-significant accidents)*
- Likelihood of fuel cooling dependent on reactor cavity design
 - Cavity flooding above top of fuel expected for some plants
 - For other plants, ECCS may not be sufficient to cool fuel

*For some plants, this may be dependent on plant changes in response to GSI-191.

Scoping Study Conclusions

- The conditional probability of early fuel damage (given a PTS-induced RPV failure) appears to be
 - Extremely small for plants with cavities likely to be flooded
 - Non-negligible for other plants
- The conditional probability of early containment failure and a large, early release (given a PTS-induced RPV failure) appears to be very small for all plants
- Should a PTS-induced large, early release occur, such a release may involve a large-scale air-oxidation source term

Implications for RVFF*

- RVFF* = 1 x 10⁻⁶/ry is consistent with philosophy of original PTS rule, with ACRS guidance, and with Safety Goal Policy Statement
 - Assures a low level of risk associated with PTS events
 - Assures small relative contribution to acceptable risk
 - More limiting with respect to core damage than RG 1.174/Option 3 criterion for CDF
 - Consistent or conservative with respect to QHOs
- Expectation: RPV embrittlement limits will be established in a risk-informed manner

Summary Conclusions

- RVFF = TWCF
- RVFF* = 1 x 10⁻⁶/ry
- RVFF* should be compared against mean of plant-specific RVFF distribution

Backup Slides

Technical Issues

- Definition of RVFF
- Dominant plant damage states
- Relative contribution of axial and circ welds
- Crack propagation, hole size, hole location
- Blowdown forces
- Containment isolation
- Missiles
- ECCS status (injection, recirculation)
- Containment spray status
- Core status (intact, distorted, disrupted)
- Fuel dispersal
- Fuel coolability
- RPV water level
- Fuel environment (steam, air)
- Early overpressure

APET (Page 1 of 5)





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VG 34

APET (Page 5 of 5)

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Palisades Reactor Cavity



VG 36

Calvert Cliffs Containment



PTS Re-Evaluation Project Briefing



	Topic	Presenters	Time
1	Opening Remarks	P. Ford, ACRS	8:30-8:35 a m
11.	PTS Re-evaluation Project and Staff Introductions	M. Mayfield, RES	8:35-8:50 a.m.
H	PTS Project Overvier, Background, Significance of RELAP differences w experiments	M. Fark. D. Bessette	8:50-9:55 a m
	BREAK		9:55-10:10 a.m
I¥.	Plant Specific Results (Oconee-1, Beaver Valey-1, Pallsades) Thermal-Hydraulic characteristics of dominant transients Uncertainty results	M. Kirk, D. Bessette, R. Woods, D. Whitehead, A. Kolaczkowski	10.10 am - 2:10 pm
	LUNCH		12:00-1:00 p.m
۷	Risk-Informed Reactor Vessel Fallure Frequency Acceptance Criteria Post PTS Vessel Fallure considerations Results of T-H analyses	N Siu, D. Bessette	2:10-3:10
	ər əkk		3:10-3:25 p.m.
VI	PTS RT _{eer} based screening limit	M Kirk	3:25-3:55
Υŀŀ.	Overall summary and conclusions	M. Kirk, E. Hackett	3:55-4:55
VIII.	Subcommittee discussion		4:55-5:10p m
104	ð dugu se		5:10.00







































Class	Classes of Human Failures					
Primary Integrity Control	Secondary Pressure Control	Secondary Feed Control	Primary Pressure/Flow Control			
 Operator fails to isolate an isolable LOCA in a timely manner (e.g., close a block valve to a stuck-open PORV) Operator induces a LOCA (e.g., opens a PORV) that induces/enhances a cooldown 	 Operator fails to isolate a depressurization condition in a timely manner Operator isolates when not needed (may create a new depressurization challenge, lose heat sink) Operator isolates wrong path/SG (depressurization continues) Operator creates an excess steam demand such as opening turbine bypass/atmospheric dump valves 	 Operator fails to stop/throttle or property align feed in a timely manner (overcooling enhanced or continues) Operator feeds wrong (affected) SG (overcooling continues) Operator stops/throttles feed wheninappropriate (causes underfeed, may have to go to feed and bleed & possible overcooling that way) 	 Operator does not properly throttle/terminate injection to control RCS pressure Operator trips reactor coolant pumps (RCPs) when not suppose to and/or fails to restore them when desirable Operator does not provide sufficient injection or fails to trip RCPs appropriately (modeled as leading to core damage rather than a PTS concem) 			
VG 21						





































Effect of Differences Between RELAP5 and Experiment

Case	Mean Pressure Error (MPa)	Std Dev Error (MPa)	Mean DC Temp Error (K)	Std Dev DC Temp Error (K)
MIST – 4100B2	-0.2	0.3	-4	11
ROSA - AP-CL-03	-0.4	0.7	-1	16
ROSA AP-CL-09	-0.1	0.2	0	9
ROSA-IV SB-CL-18	0.2	0.2	-1	8
Mean values and s defined as: Pressure Error Average Term	standard deviations of $P = P_{RELAP} - P_{DATA}$ perature Error = TAV	the pressure and ave	rage downcomer fluid t	emperature error

FAVOR is underway

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Issues Important to Understanding the Results (Continued)

For example, the original Palisades medium LOCA bin was subdivided into the following TH bins to represent the possible spectrum of TH profiles using the split fractions provide by UMD.

TH Case No.	TH Case Description	Split Fraction	
62	20.32 cm (8 in) cold leg break. Winter conditions		
	assumed (HPI and LPI injection temp = 40 F, Accumulator temp = 60 F)		
63	14.37 cm (5.656 in) cold leg break. Winter conditions assumed (HPI and LPI injection temp = 40 F. Accumulator temp = 60 F)	0.30	
64	10.16 cm (4 in) surge line break. Summer conditions assumed (HPI and LPI injection temp =	0.35	

Characteristic	Oconee	Beaver Valley	Palisades					
Plant Type	B&W lowered loop design, 2x4 loops, OTSG	Westinghouse design, 3 loops	CE design, 2x4 loops					
Core Power (MWth)	2568	2660	2530					
RCP Trip Criteria	all pumps assumed to trip when subcooling $< 0.5^{\circ}F$	$\Delta P < 200$ psid between the RCS and highest SG pressure (normal containment conditions) $\Delta P < 375$ psid (adverse containment conditions)	one pump tripped in each loop if PZR pressure < 1300psia. All pumps tripped when subcooling < 25°F					
HPI maximum flow	180 lbm/sec	134.8 lbm/sec	184 lbm/sec					
HPI shutoff head	> 2600 psia	> 2600 psia	1292 psia					
LPI maximum flow	1050 lbm/sec	690.9 lbm/sec	922 lbm/sec					
LPI shutoff head	214 psia	215 psia	218 psia					
Accum liquid volume	2150 ft ³	3104.1 ft ³	4800 ft ³					
Accum disch press	590 psia	648 psia	215 psia					
PZR SRV Capacity	489,183 lbm/hr (total for 2 valves)	1,494,618 lbm/hr (total for 3 valves)	690,000 lbm/hr (total for 3 valves)					
SG Water Mass	40,000 lbm (HFP) 11,000 lbm (HZP)	118,760 lbm (HFP) 160,470 lbm (HZP)	142,138 lbm (HFP) 210,759 lbm (HZP)					
SG SRV Capacity	13.0 Mlb/hr (16 valves)	13.1 Mlb/hr (15 valves)	37.6 Mlb/hr (24 valves)					
AFW maximum flow (total)	1390 gpm (motor) 1350 gpm (turbine)	700 gpm (motor) 700 gpm (turbine)	400 gpm (motor) 400 gpm (turbine)					

Plant-Specific TH Features (Cont.) Reactor vessel vent valves (B&W) As in Oconee, valves connect upper plenum towncomer. LPI and Accumulator: Beaver Valley and Palisades LPI and accumulator connections to each cold leg Oconee- low pressure injection and core flood tank (accumulator) discharge connected directly to the downcomerabove the cold leg nozzle Palisades- low accumulator initial pressure HPI flow characteristics Oconee- about 30 percent more flow to the "A" loop compared to the B loop Beaver Valley and Palisadesequal flow to all loops



























































Resulting Comparison of Internal vs. External Event TWCFs

(External Event TWCFs ≤ highest Internal Event TWCFs)

Scenario	Internal Event Frequencies	Internal Event CPFs @ <_100 EFPY	Internal Event TWCFs	External Event Frequencies	External Event CPFs @ <_100 EFPY	External Event TWCFs
Small LOCA	< 2E-3/vr	< E-5	< 2E-8/vr	< 5E-4/vr	< E-5	< 5E-9/vr
Stuck-open PORV	< 3E-4/yr	< E-5	< 3E-9/yr	< 2E-3/yr	< E-5	< 2E-8/yr

VG 103





General Information Categories Examined in Generalization Step

- Secondary Breaches
- Secondary Overfeed
- LOCA Related
- PORV and SRV Related
- Feed and Bleed Related





















Principles in Developing and Evaluating Options

- Consistency with intent of original rule
 - Low risk level
 - Low relative contribution
- Consistency with recent riskinformed initiatives
 - Risk metrics
 - Risk criteria
 - Consideration of defensen-depth















Potential Sources of Dependence Between Top Events

- Plant systems
- RPV movement
- Fragments
- Fuel movement






























Operational Considerations		Oconee	Beaver	Palisades
All material factors held equal, the severity of PTS challenge is remarkably similar between the plants studied	Secondary Side Primary Side LOCA			





Characteristics of a Physically-Motivated Embrittlement Metric

A causal relationship should exist between the embrittlementmetric and TWCF ... so ...

- Axial weld / plate properties dominate the metric,
- Circ weld / forging / plate properties play minor role
- Relevant fluence is that along the welds

VG 149

 Large regions of plate / forging remote from welds don't matter











On-Going Activities

- RES activities
 - Calvert cliffs
 - Generalization to all plants
 - Sensitivity studies & a more detailed examination of current results
 - Favor V&V
 - External peer review of project
 - Implications for operational limits (10CFR Appendix G)
- NRR activities
 - RES Draft NUREG sent to NRR on 1-21-02
 - NRR comments due by 331-03
 - Decision to proceed with rulemaking?

VG 155



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