

ATTACHMENT 2

ADDITIONAL PROPOSED TECHNICAL SPECIFICATIONS

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.  
INDIAN POINT UNIT NO. 2  
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- c. Unscheduled steam generator examinations shall be required in the event there is a primary to secondary leak exceeding technical specifications, a seismic occurrence greater than an operating basis earthquake, a loss-of-coolant accident requiring actuation of engineered safeguards, or a major steamline or feedwater line break.
- d. Unscheduled examinations may include only the steam generator(s) affected by the leak or other occurrence.
- e. In case of an unscheduled steam generator examination, the profilometry tensile strain criterion shall be the same as contained in the program for the last scheduled steam generator inspection.

3. Basic Sample Selection and Examination

- a. At least 12% of the tubes in each steam generator to be examined shall be subjected to a hot-leg examination.
- b. At least 25% of the tubes inspected in Specification 4.13.A.3.a above shall be subjected to a cold-leg examination.
- c. At least 20% of a random sample of tubes containing sleeves shall be subjected to an examination throughout the sleeved portion of the tube.
- d. Tubes selected for examination shall include, but not be limited to, tubes in areas of the tube bundle in which degradation has been reported, either at Indian Point 2 in prior examinations, or at other utilities with similar steam generators.
- e. Examination for deformation ("dents") shall be either by eddy current or by profilometry.
- f. Examination for degradation other than deformation shall be by eddy current techniques, using a 700-mil diameter probe. If the 700-mil diameter probe cannot pass through the tube, a 610-mil diameter probe shall be used. For examination of the U-bends and cold-legs of tubes in rows 2 through 5, a 540-mil diameter probe may be used, provided it is justified by profilometry measurement within the tensile strain criterion.

- g. In addition to the minimum sample size as determined by Table 4.13-1, all F\* tubes shall be inspected within the pertinent tubesheet region. The results of F\* tube inspections are not to be utilized as a basis for additional inspections per Table 4.13-1.

#### 4. Additional Examination Criteria

##### 1. Degradation Not Caused by Denting

- a. If 5% or more of the tubes examined in a steam generator exhibit degradation or if any of the tubes examined in a steam generator are defective, additional examinations shall be required as specified in Table 4.13-1 with the exception of degraded or defective tube sleeves.
- b. Tubes for additional examination shall be selected from the affected area of the tube array and the examination may be limited to that region of the tube where degradation or defective tube(s) were detected.
- c. The second and third sample inspections in Table 4.13-1 may be limited to the partial tube inspection only, concentrating on tubes in the areas of the tube sheet array and on the portion of the tube where tubes with imperfections were found.
- d. If a tube sleeve exhibits degradation of greater than 23% or is otherwise defective, an additional 20% (minimum) of the unsampled sleeves shall be examined. If a sleeve exhibits degradation of greater than 23% or is otherwise defective in the second sample, all remaining sleeves shall be examined.

##### 2. Degradation Caused by Denting

- a. Additional examinations, for degradation caused by denting, shall be performed as described in the most recent steam generator examination program.

## Basis

Inservice examination of steam generator tubing is essential if there is evidence of mechanical damage or progressive deterioration in order to assure continued integrity of the tubing. Inservice examination of steam generator tubing also provides a means of characterizing the nature and cause of any tube degradation so that corrective measures can be taken.

An essentially 100% tube examination was performed on each tube in each steam generator by eddy current techniques prior to service in order to establish a baseline condition for the tubing. No significant baseline imperfections were identified. In addition, prior to the discontinuance of phosphate treatment and the institution of all-volatile treatment (AVT), a baseline inspection was conducted in March, 1975 before the resumption of power operation.

Wastage-type defects are unlikely with the all-volatile treatment (AVT) of secondary coolant; however, even if this type of defect occurs, the steam generator tube examination will identify tubes with significant degradation from this effect.

The results of steam generator tube burst and collapse tests have demonstrated that tubes having wall thickness of not less than 0.025 inch have adequate margins of safety against failure due to loads imposed by normal plant operation and design basis accidents. An allowance of 10% for tube degradation that may occur between inservice tube examinations added to the 40% degradation depth provided in the acceptance criteria provides an adequate margin to assure that tubes considered acceptable for continued operation will not have a minimum tube wall thickness of less than the acceptable 50% of normal tube wall thickness (i.e. 0.025 inch) during the service life-time of the tubes. Steam generator tube examinations of other operating plants have demonstrated the capability to reliably detect wastage type defects that have penetrated 20% of the original 0.050 inch wall thickness.

Examination of samples of tubes and support plates removed from steam generators have revealed that "denting" is caused by the accretion of steel corrosion products in the tube/support plate annuli. As these corrosion products are more voluminous than the support plate material from which they are derived, a compressive force is exerted on the tubes in the plane of the support plates, resulting in deformation of the tubes. If the deformation results in an ovalization of the tubes, the resulting strain is low and there is no risk of development of stress corrosion cracking in the tubes. However, if the deformation results in an irregular tube shape, the resulting strain may be high enough for the tube to become susceptible to stress corrosion cracking inservice, and it should be preventively repaired. Beginning with the steam generator examination to be conducted during the Cycle 5/6 Refueling Outage, the tensile strain criterion for profilometry shall be 25%. The 25% strain criterion is based on a review of data currently available from operating steam generators, and will be revised as necessary as more experience is gained with the evaluation of this measurement. In the future, this criterion

may be revised, either higher or lower, based on steam generator examination results. The profilometry criterion to be used for any steam generator examination shall be established in the most recent program.

A first report on the R&D work leading to the development of profilometry, entitled "Profilometry of Steam Generator Tubes" dated August, 1980, was forwarded to the NRC by Con Edison. Additional R&D work has improved the accuracy of the profilometer and the calculation of strain in a deformed tube.

Before the development of profilometry, a minor diameter of 0.610" was established as the criterion for continuing a tube inservice. This criterion was used successfully for several years at Indian Point Unit 2 and at other plants, and appears to be sufficiently conservative so that it can be continued in the absence of more accurate strain determination by means of profilometry.

A sound roll expansion throughout the F\* distance provides a tube to tubesheet interface that ensures the requirements of Regulatory Guide 1.121 are met regardless of the severity of any tube degradation below the F\* distance. The F\* distance of 1.25 inches is comprised of 1.01 inches of sound roll that ensures tube integrity requirements are met plus 0.24 inches which allows for eddy current measurement uncertainty. The testing and analysis supporting the F\* distance is documented in B&W Nuclear Technologies Qualification Report No. BAW-10195P.

Testing performed as documented in BAW-10195 P demonstrates the maximum postulated leakage under accident conditions for repair of 100% of the tube ends using the F\* criteria is well below the allowable leakage limits for Indian Point 2 steam generators. If, in the future, steam generator tubes are allowed to remain in service by the use of F\* and, in addition, other tube acceptance criteria, then the aggregate maximum postulated accident leakage must be below the allowable leakage limits for Indian Point 2 steam generators.

This program for inservice inspection of steam generator tubes exceeds the requirements of Regulatory Guide 1.83, Revision 1, dated July 1975.