

ATTACHMENT 2

Letter from C. R. Steinhardt (WPSC)

To

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1. Steam Generator Sample Selection and Inspection

The in-service inspection may be limited to one steam generator on a rotating schedule encompassing the number of tubes determined in TS 4.2.b.2.a provided the previous inspections indicated that the two steam generators are performing in a like manner.

2. Steam Generator Tube Sample Selection and Inspection

The tubes selected for each in-service inspection shall:

- a. Include at least 3% of the total number of nonrepaired tubes, in both steam generators, and 3% of the total number of repaired tubes in both steam generators. The tubes selected for these inspections shall be selected on a random basis except as noted below and in TS 4.2.b.2.b.

Indications left in service as a result of application of the tube support plate voltage-based repair criteria shall be inspected by bobbin coil probe during all future REFUELING outages.

- b. Concentrate the inspection by selection of at least 50% of the tubes to be inspected from critical areas where experience in similar plants with similar water chemistry indicates higher potential for degradation.
- c. Include the inspection of all non-plugged tubes which previous inspections revealed in excess of 20% degradation. The previously degraded tubes need only be inspected about the area of previous degradation indication if their inspection is not employed to satisfy 4.2.b.2.a and 4.2.b.2.b above.

Implementation of the steam generator tube/tube support plate repair criteria requires a 100% bobbin coil inspection for hot leg and cold leg tube support plate intersections down to the lowest cold leg tube support plate with known outside diameter stress corrosion cracking (ODSCC) indications. The determination of the lowest cold-leg tube support plate intersections having ODSCC indications shall be based on the performance of at least a 20% random sampling of tubes inspected over their full length.

- d. The second and third sample inspections during each in-service inspection may be less than the full length of each tube by concentrating the inspection on those areas of the tubesheet array and on those portions of the tubes where tubes with imperfections were previously found.

- c. Additional, unscheduled in-service inspections shall be performed on each steam generator in accordance with the first sample inspection specified in Table 4.2-2 during the shutdown subsequent to any of the following conditions:
 1. Primary-to-secondary tube leaks (not including leaks originating from tube-to-tubesheet welds) in excess of the limits of TS 3.1.d and TS 3.4.a.1.C or
 2. A seismic occurrence greater than the Operating Basis Earthquake, or
 3. A loss-of-coolant accident requiring actuation of the engineering safeguards, where the cooldown rate of the Reactor Coolant System exceeded 100°F/hr, or
 4. A main steam line or feedwater line break, where the cooldown rate of the Reactor Coolant System exceeded 100°F/hr.
- d. If the type of steam generator chemistry treatment is changed significantly, the steam generators shall be inspected at the next outage of sufficient duration following 3 months of power operation since the change.

4. Plugging Limit Criteria

The following criteria apply independently to tube and sleeve wall degradation except as specified in TS 4.2.b.5 for the tube support plate intersections for which voltage-based plugging criteria are applied.

- a. Any tube which, upon inspection, exhibits tube wall degradation of 50% or more shall be plugged or repaired prior to returning the steam generator to service. If significant general tube thinning occurs, this criterion will be reduced to 40% wall degradation. Tube repair shall be in accordance with the methods described in WCAP-11643, "Kewaunee Steam Generator Sleeving Report (Mechanical Sleeves)" or CEN-413-P, "Kewaunee Steam Generator Tube Repair Using Leak Tight Sleeves."
- b. Any Westinghouse mechanical sleeve which, upon inspection, exhibits wall degradation of 31% or more shall be plugged prior to returning the steam generator to service. Figure TS 4.2-1 illustrates the application of tube, sleeve, and tube/sleeve joint plugging limit criteria.
- c. Any Combustion Engineering leak tight sleeve which, upon inspection, exhibits wall degradation of 40% or more shall be plugged prior to returning the steam generator to service. This plugging limit applies to the sleeve up to and including the weld region.

5. Tube Support Plate Plugging Limit

The following criteria are used for the disposition of a steam generator tube for continued service that is experiencing predominantly axially oriented outside diameter stress corrosion cracking confined within the thickness of the tube support plates. At tube support plate intersection, the repair limit is based on maintaining steam generator tube serviceability as described below:

- a. Degradation attributed to outside diameter stress corrosion cracking within the bounds of the tube support plate with bobbin voltage ≤ 2.0 volts will be allowed to remain in service.
- b. Degradation attributed to outside diameter stress corrosion cracking within the bounds of the tube support plate with a bobbin voltage > 2.0 volts will be repaired or plugged except as noted in TS 4.2.b.5.c below.
- c. Indications of potential degradation attributed to outside diameter stress corrosion cracking within the bounds of the tube support plate with a bobbin voltage > 2.0 volts but \leq the upper voltage repair limit, may remain in service if a rotating pancake coil inspection does not detect degradation. Indications of outside diameter stress corrosion cracking degradation with a bobbin voltage $>$ the upper voltage repair limit will be plugged or repaired.
- d. If an unscheduled mid-cycle inspection is performed, the following repair limits apply instead of TS 4.2.b.5.a, b and c. The mid-cycle repair limits are determined from the following equation:

$$V_{MURL} = \frac{V_{SL}}{1.0 + NDE + Gr \left(\frac{CL - \Delta t}{CL} \right)}$$
$$V_{MLFL} = V_{MURL} - (V_{URL} - 2.0) \left(\frac{CL - \Delta t}{CL} \right)$$

Where:

- V_{MURL} = mid-cycle upper voltage repair limit based on time into cycle
- V_{SL} = structural limit voltage
- NDE = 95% cumulative probability allowance for NDE uncertainty
- Gr = average growth rate per cycle length
- CL = cycle length (time between scheduled inspections)
- Δt = length of time since last scheduled inspection during which V_{URL} and V_{LRL} were implemented
- V_{MLRL} = mid-cycle lower voltage repair limit based on V_{MURL} and time into cycle
- V_{URL} = upper voltage repair limit

Implementation of these mid-cycle repair limits should follow the same approach as in TS 4.2.b.5.a, b and c.

6. Reports

- a. Following each in-service inspection of steam generator tubes, if there are any tubes requiring plugging or repairing, the number of tubes plugged or repaired shall be reported to the Commission within 30 days.
- b. The results of the steam generator tube in-service inspection shall be included in the Annual Operating Report for the period in which this inspection was completed. This report shall include:
 1. Number and extent of tubes inspected.
 2. Location and percent of wall-thickness penetration for each indication of a degradation.
 3. Identification of tubes plugged.
 4. Identification of tubes repaired.
- c. Results of a steam generator tube inspection which fall into Category C-3 require prompt (within 4 hours) notification of the Commission consistent with 10 CFR 50.72(b)(2)(i). A written follow up report shall be submitted to the Commission consistent with Specification 4.2.b.6.a, using the Licensee Event Report System to satisfy the intent of 10 CFR 50.73(a)(2)(ii).
- d. For implementation of the voltage-based repair criteria to tube support plate intersections, notify the NRC staff prior to returning the steam generators to service should any of the following conditions arise:

1. If estimated leakage based on the projected end-of-cycle (or if not practical, using the actual measured end-of-cycle) voltage distribution exceeds the leak limit (determined from the licensing basis dose calculation for the postulated main steamline break) for the next operating cycle.
2. If circumferential crack-like indications are detected at the tube support plate intersections.
3. If indications are identified that extend beyond the confines the tube support plate.
4. If indications are identified at the tube support plate elevations that are attributable to primary water stress corrosion cracking.
5. If the calculated conditional burst probability based on the projected end-of-cycle (or if not practical, using the actual measured end-of-cycle) voltage distribution exceeds 1×10^{-2} , notify the NRC and provide an assessment of the safety significance of the occurrence.

There are three types of Combustion Engineering leak tight sleeves. The first type, the straight tubesheet sleeve, spans the degraded area of the parent tube in the tubesheet crevice region. The sleeve is welded to the parent tube near each end. The second type of sleeve is the peripheral tubesheet sleeve. The sleeve is initially curved as part of the manufacturing process and straightened as part of the installation process. The third type of sleeve, the tube support plate sleeve, spans the degraded area of the tube support plate and is installed up to the sixth support plate. This sleeve is welded to the parent tube near each end of the sleeve.

The hydraulic equivalency ratios for the application of normal operating, upset, and accident condition bounding analyses have been evaluated. Design, installation, testing, and inspection of steam generator tube sleeves requires substantially more engineering than plugging, as the tube remains in service. Because of this, the NRC has defined steam generator tube repair to be an Unreviewed Safety Question as described in 10 CFR 50.59(a)(2). As such, other tube repair methods will be submitted under 10 CFR 50.90; and in accordance with 10 CFR 50.91 and 92, the Commission will review the method, issue a significant hazards determination, and amend the facility license accordingly. A 90-day time frame for NRC review and approval is expected.

Technical Specification 4.2.b.5

The repair limit of tubes with degradation attributable to outside diameter stress corrosion cracking contained within the thickness of the tube support plates is conservatively based on the analysis documented in WCAP-12985, "Kewaunee Steam Generator Tube Plugging Criteria for ODSCC at Tube Support Plates" and EPRI Draft Report TR-100407, Rev.1, "PWR Steam Generator Tube Repair Limits - Technical Support Document for Outside Diameter Stress Corrosion Cracking at Tube Support Plates." Application of these criteria is based on limiting primary-to-secondary leakage during a steam line break to ensure the applicable 10 CFR Part 100 limits are not exceeded.

The voltage-based repair limits of TS 4.2.b.5 implement the guidance in Generic Letter 95-05 and are applicable only to Westinghouse-designed steam generators with outside diameter stress corrosion cracking (ODSCC) located at the tube-to-tube support plate intersections. The voltage-based repair limits are not applicable to other forms of tube degradation nor are they applicable to ODSCC that occurs at other locations within the steam generators. Additionally, the repair criteria apply only to indications where the degradation mechanism is predominantly axial ODSCC with no indications extending outside the thickness of the support plate. Refer to GL 95-05 for additional description of the degradation morphology.

Implementation of TS 4.2.b.5 requires a derivation of the voltage structural limit from the burst versus voltage empirical correlation and the subsequent derivation of the voltage repair limit from the structural limit (which is then implemented by this surveillance).

The voltage structural limit is the voltage from the burst pressure/bobbin voltage correlation, at the 95 percent prediction interval curve reduced to account for the lower 95/95 percent tolerance bound for tubing material properties at 650°F (i.e., the 95 percent LTL curve). The voltage structural limit must be adjusted downward to account for potential flaw growth during an operating interval and to account for NDE uncertainty. The upper voltage repair limit, V_{URL} , is determined from the structural voltage limit by applying the following equation:

$$V_{URL} = V_{SL} - V_{GR} - V_{NDE}$$

Where V_{GR} represents the allowance for flaw growth between inspections and V_{NDE} represents the allowance for potential sources of error in the measurement of the bobbin coil voltage. Further discussion of the assumptions necessary to determine the voltage repair limit are discussed in GL 95-05.

The mid-cycle equation should only be used during unplanned inspection in which eddy current data is acquired for indications at the tube support plates.

Technical Specification 4.2.b.6

Category C-3 inspection results are considered abnormal degradation to a principal safety barrier and are therefore reportable under 10 CFR 50.72(b)(2)(i) and 10 CFR 50.73(a)(2)(ii).

TS 4.2.b.6.d implements several reporting requirements recommended by GL 95-05 for situations which NRC wants to be notified prior to returning the steam generators to service. For TS 4.2.b.6.d.3 and 4, indications are applicable only where alternate plugging criteria is being applied. For the purposes of this reporting requirement, leakage and conditional burst probability can be calculated based on the as-found voltage distribution rather than the projected end-of-cycle voltage distribution (refer to GL 95-05 for more information) when it is not practical to complete these calculations using the projected EOC voltage distributions prior to returning the steam generators to service. Note that if leakage and conditional burst probability were calculated using the measured EOC voltage distribution for the purposes of addressing GL Sections 6.a.1 and 6.a.3 reporting criteria, then the results of the projected EOC voltage distribution should be provided per GL Section 6.b(c) criteria.