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SUBJECT: Forwards non-proprietary & proprietary repts entitled Rev 3 to "Laser Welded Repair of Hybrid Expansion Joint Sleeves for Kewaunee NPP," in support of review of 970422 proposed TS amend request.Proprietary version withheld.

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NRC-97-46

WISCONSIN PUBLIC SERVICE CORPORATION

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May 15, 1997

10 CFR 50.90

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Ladies/Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Proposed Amendment 144c to the Kewaunee Nuclear Power Plant Technical Specifications:
Laser Welded Repair of Degraded Westinghouse Hybrid Expansion Joint Sleeves

References:

1) Letter from C.R. Steinhardt (WPSC) to U.S. Nuclear Regulatory Commission dated April 18, 1996.

2) Letter from C.R. Steinhardt (WPSC) to U.S. Nuclear Regulatory Commission dated September 6, 1996.

3) Letter from M. L. Marchi (WPSC) to U.S. Nuclear Regulatory Commission dated January 23, 1997.

4) Letter from C.R. Steinhardt (WPSC) to U.S. Nuclear Regulatory Commission dated April 22, 1997.

By letter dated April 22, 1997, Wisconsin Public Service Corporation (WPSC) submitted Technical Specification (TS) amendment 144b to allow a laser welded repair of Westinghouse hybrid expansion joint sleeved steam generator (SG) tubes. WPSC discussed this proposed repair process with the NRC staff in meetings on October 10, 1996; December 17, 1996; January 14, 1997; March 24, 1997; and April 14, 1997. Based on subsequent discussions with the NRC staff, additional clarification is required to WCAP-14685, Revision 2, which is currently being reviewed by the NRC staff in support of the proposed TS amendment request.

Proposed TS page 4.2-6 and basis page B4.2-4 are being revised to reference WCAP-14685, Revision 3; these revised pages are contained in Attachment 1. In addition, the Table of Contents and subsequent pages are being submitted since the page breaks are affected. Attachment 2

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contains WCAP-14685, Revision 3, "Laser Welded Repair of Hybrid Expansion Joint Sleeves for Kewaunee Nuclear Power Plant," (proprietary) and WCAP-14686, Revision 3, (non-proprietary version), both dated May 1997. Also included are the Westinghouse authorization letter, accompanying affidavit, Proprietary Information Notice and Copyright Notice. WCAP-14685, Revision 2, Addendum 1, "Evaluation of Weld Repaired HEJ Sleeved Tubes," remains unchanged. Attachment 3 contains selected pages from the Westinghouse procedure on acceptance criteria for performing ultrasonic inspections of laser welds. This information was requested by the NRC staff to perform their review of the proposed TS amendment. This change to the proposed TS amendment does not alter the information and conclusions of the significant hazards determination or environmental considerations as discussed in the previous submittal dated April 22, 1997.

In addition, there was an error in the cover letter which submitted PA 144a dated January 23, 1997. The cover letter incorrectly stated that the minimum distance between the weld and the parent tube indication should be 0.125 inch. The correct value, as discussed in WCAP-14685, Revision 3, is 0.25 inch.

WPSC appreciates the continued efforts of the NRC staff to review this proposed TS amendment as a high priority request. Please contact a member of my staff if you have any questions or require additional information.

Sincerely,

M Marchi for
Clark R. Steinhardt
Senior Vice President - Nuclear Power

SLB/jmf

Attach.

cc - US NRC - Region III
US NRC Senior Resident Inspector
Mr. Lanny Smith, PSCW

Subscribed and Sworn to
Before Me This 15th Day
of May 1997

Jeanne M. Ferris
Notary Public, State of Wisconsin

My Commission Expires:
June 13, 1999

ATTACHMENT 1

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

May 15, 1997

Proposed Amendment 144c

Affected TS Pages:

TS ii
TS 4.2-6 thru TS 4.2-11
TS B4.2-4 thru TS B4.2-7

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. <u>Plugging Limit Criteria</u>

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 or for degradation except as specified in TS 4.2.b.6 for tubesheet crevice region in which the F* and EF* criteria is 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-14685, Revision 3, "Laser Welded Repair of Hybrid Expansion Joint Sleeves for Kewaunee Nuclear Power Plant," WCAP-14685, Revision 2, Addendum 1, "Laser Welded Repair of Hybrid Expansion Joint Sleeves for Kewaunee Nuclear Power Plant Addendum 1: Evaluation of Weld Repaired HEJ Sleeved Tubes," WCAP-11643, "Kewaunee Steam Generator Sleeving Report (Mechanical Sleeves)," CEN-413-P, "Kewaunee Steam Generator Tube Repair Using Leak Tight Sleeves," or WCAP-13088, Revision 3, "Westinghouse Series 44 and 51 Steam Generator Generic Sleeving Report."

b. Any Westinghouse mechanical hybrid expansion joint (HEJ) sleeve which, upon inspection, exhibits wall degradation of 24% or more shall be plugged or repaired prior to returning the steam generator to service. For disposition of parent tube indications (PTI), the following requirements will apply:

   1. HEJ sleeved tubes with circumferential indications located within the upper hardroll lower transition shall be inspected with a non-destructive examination (NDE) technique capable of measuring the sleeve ID difference between the sleeve hardroll peak diameter, and the sleeve ID at the elevation of the PTI. If this diameter change is $\geq$ 0.003" (plus an allowance for NDE uncertainty), the indication may remain in service provided the faulted loop steam line break (SLB) leakage limit from all sources is not exceeded. A SLB leakage allowance of 0.025 gpm shall be assumed for each indication left in service regardless of length or depth. For tubes where the diameter difference is > 0.013", SLB leakage can be neglected.

   2. HEJ sleeved tubes with a sleeve ID difference of < 0.003" (plus an allowance for NDE uncertainty) between the sleeve ID hardroll peak diameter and sleeve ID at the elevation of the PTI shall be plugged or repaired prior to returning the steam generator to service.

   3. HEJ sleeved tubes with axial indications located within the parent tube pressure boundary as defined on Figure TS 4.2-1 shall be plugged or repaired prior to returning the steam generator to service.

   4. HEJ sleeved tubes with parent tube indications located outside of the parent tube pressure boundary as defined on Figure TS 4.2-1 may remain in service.

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.

d. Any Westinghouse laser welded sleeve which, upon inspection, exhibits wall degradation of 25% 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.

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 $\leq$ 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:

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

$$V_{MLRL} = V_{MURL} - (V_{URL} - 2.0)\left(\frac{CL - \Delta t}{CL}\right)$$

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.

NOTE: The upper voltage repair limit is calculated according to the methodology in Generic Letter 95-05 as supplemented.

6. F* and EF* Tubesheet Crevice Region Plugging Criteria

The following criteria are to be used for disposition or repair of steam generator tubes experiencing degradation in the tubesheet crevice region.

a. Tubes with indications of degradation within the roll expanded region below the midpoint of the tubesheet may remain in service provided the distance from the bottom of the uppermost roll transition to the tip of the crack is greater than 1.12" (plus an allowance for NDE uncertainty). This criteria is called the F* criteria and applies to the factory roll expansion, or to additional roll expansions formed as an extension of the original roll. Any degradation existing below the F* (plus an allowance for NDE uncertainty) is acceptable for continued service.

b. Indications of degradation not repairable by 4.2.b.6.a may be repaired using the EF* criteria. The EF* region is located a minimum of 4" below the top of the tubesheet, and is formed by an additional roll expansion of the tube in the originally unexpanded length. Tubes with indications of degradation within the EF* region may remain in service provided the distance from the bottom of the uppermost roll transition to the tip of the crack is greater than 1.44" (plus an allowance for NDE uncertainty). Any degradation existing below EF* (including uncertainty) is acceptable for continued service.

7. 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. This report shall include the tubes for which the F* or EF* criteria were applied.

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.7.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.

The pressure boundary for HEJ sleeves is shown on Figure TS 4.2-1. The pressure boundary used to disposition parent tube indications (PTIs) detected in the upper joint of HEJ sleeved tubes is discussed in WCAP-14641[6]. The pressure boundary will allow PTIs located such that there is a minimum diameter change of 0.003 inch (plus an allowance for NDE uncertainty) between the peak diameter of the sleeve hardroll, and the diameter at the elevation of the PTI, to remain in service. The 0.003 inch interference lip is derived from structural and leakage testing. When inspecting and dispositioning the PTIs, the acceptance criteria will be adjusted to account for measurement uncertainties associated with the technique used to measure the relative change in ID sleeve diameters. During field application, the PTI elevation will be measured by comparing the diameter reported at the peak amplitude of the flaw, and the diameter at the center of the plus point coil's field, and using the more conservative of the two diameters to perform the ΔD determination. Application of the pressure boundary for HEJ sleeved tubes provides allowance for leakage in a faulted loop during a postulated steam line break (SLB) event. A SLB leakage of 0.025 gpm is assumed for each applicable indication. Steam line break leakage from all sources must be calculated to be < 34 gpm in the faulted loop. Maintenance of the 34 gpm limit ensures off-site doses will remain within a small fraction of the 10 CFR Part 100 guidelines for a SLB.

Recent inspection information has indicated a potential for the parent tube behind the upper HEJ region to develop service induced degradation. For parent tube degradation within or below the upper HEJ hardroll lower transition, tube operability can be restored by fusing the sleeve and tube using a laser welding process effectively isolating the degradation below the weld. The laser weld repair is performed similar to the initial installation of laser welded sleeves. The laser repair weld for degraded parent tubes with installed HEJ sleeves has been shown to meet the weld qualification, stress and fatigue requirements of the ASME code. All laser weld repaired HEJ sleeved tubes will receive a post weld stress relief at the weld location and ultrasonic inspection to verify weld quality, in accordance with the process described in WCAP-14685, Revision 3[7] and WCAP-14685, Revision 2, Addendum 1[8].

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[6]WCAP-14641, "HEJ Sleeved Tube Structural Integrity Criteria: Diameter Interference at PTIs," April 1996.

[7]WCAP-14685, Revision 3, "Laser Welded Repair of Hybrid Expansion Joint Sleeves for Kewaunee Nuclear Power Plant," May 1997 (Proprietary).

[8]WCAP-14685, Revision 2, Addendum 1, "Laser Welded Repair of Hybrid Expansion Joint Sleeves for Kewaunee Nuclear Power Plant Addendum 1: Evaluation of Weld Repaired HEJ Sleeved Tubes," April 1997 (Proprietary).

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.

Two types of Westinghouse laser welded sleeves can be installed, tube support plate sleeves and tubesheet sleeves.

The tube support plate sleeve is 12" long and spans the degraded area of the tube adjacent to the support plate intersection. The tube support plate sleeve is hydraulically expanded and laser welded at each end. The pressure boundary portion of the tube support plate sleeve is the weld and the sleeve section between the welds. Tubesheet sleeves extend from the tube end to above the top of the tubesheet. Standard and bowed or peripheral tubesheet sleeves can be installed. The upper or free span joint is hydraulically expanded and laser welded. The lower joint is hydraulically expanded and roll expanded. Standard tubesheet sleeves extend from 27" to 36" in length while bowed tubesheet sleeves extend from 30" to 36" in length. The pressure boundary portion of the tubesheet sleeve is the weld and below, down to the tubesheet primary face.

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

Tubes with indications of degradation in either the original factory roll expansion in the tubesheet or the unexpanded portion of tube within the tubesheet may be dispositioned for continued service or repaired through application of the F* or EF* criteria. The F* and EF* criteria are described in WCAP-14677[9]. The F* and EF* criteria are established using guidance consistent with RG 1.121. Neither the F* or EF* criteria will significantly contribute to offsite dose following a postulated main steam line break such that contributions from these sources need to be included in offsite dose analyses. Inherent to these criteria is the ability to perform an additional roll expansion of the tube, either as an extension of the original factory roll expansion, in which case F* criteria applies, or in the area starting approximately 4" below the top of the tubesheet, in which case EF* criterion apply. The additional roll expansion procedure can be applied over existing degradation, provided the F* or EF* requirements for non-degraded roll expansion lengths of 1.12" (plus an allowance for NDE uncertainty) and 1.44" (plus an allowance for NDE uncertainty), respectively, are satisfied. The NDE uncertainty applied to the F* and EF* distance is a function of the eddy current probe and technique used. Current state-of-the art inspection technology will be used with implementation of the F* and EF* criteria. The uncertainty in such inspections has been shown to be as small as 0.06", however, for field application, an eddy current uncertainty of 0.20" will be applied. Any and all indications of degradation existing below the F* or EF* distance is acceptable for continued service.

Technical Specification 4.2.b.7

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.7.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.7.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.

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[9]WCAP 14677, F* and Elevated F* Tube Alternate Repair Criteria for Tubes With Degradation Within the Tubesheet Region of the Kewaunee Steam Generators, June 1996 (Proprietary).

ATTACHMENT 2

Letter from C. R. Steinhardt (WPSC)

To

Document Control Desk (NRC)

Dated

May 15, 1997

Proposed Amendment 144c

WCAP-14685, Revision 3
WCAP-14686, Revision 3
Proprietary Information Notice
Copyright Notice
Affidavit

Proprietary Information Notice

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