

**First Set of Responses to the 210 Day RAIs from RAI Set 2 for WCAP-17642, “Westinghouse Performance Analysis and Design Model (PAD5)” (Non-Proprietary)**

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**RAI-6 (part a)**

A statistical probability for underprediction can be determined for the upper bound release model utilizing the number of prototypical LTA data [

] <sup>a,c</sup>. Based on this probability provide an estimate of how many fuel rods in a core (4 loop plant) with ZrB<sub>2</sub> operating for both 18 and 24 month cycles will be underpredicted using the upper bound helium release model. Please justify the underprediction of helium release for these rods with ZrB<sub>2</sub>. Please describe how the statistical analysis of probability was performed along with a tabulation of the predicted values identifying the data from Table 4.2-1.

**Response to RAI-6a**

PAD5 Upper Bound (UB) model conservatively [

] <sup>a,c</sup>. The new data requested in RAI-6c (Reference 6-1) [

] <sup>a,c</sup> as shown in Figure 6-1.

[

] <sup>a,c</sup>

It should be noted that a significant part of [

] <sup>a,c</sup>

Accounting for the added data and consistent with the statistical analysis performed at the 95/95 level [

[

] <sup>a,c</sup> The updated bounding models and the saturated release data are shown in Figure 6-2. The updated bounding model are expected (with 95% confidence) to cover the saturated helium release for 95% of the total population of ZrB<sub>2</sub> rods.

**References**

- 6-1. LTR-NRC-15-87, "Response to the 60 day RAIs from RAI Set 2 for WCAP-17642, "Westinghouse Performance Analysis and Design Model (PAD5)" (Proprietary/Non-Proprietary)" October 30, 2015.
- 6-2. George, F. and Ramachandran, K. M., "Estimation of Parameters of Johnson's System of Distributions," Journal of Modern Applied Statistical Methods, November 2011, Vol. 10, No. 2, 494-504.

**Table 6-1:** Data Used to Develop Statistical Uncertainties for Saturated Release

Plant	Thickness (mil)	B <sup>10</sup> Enrichment (%)	Percent B (%)	Helium Release (Fraction)	Burnup (GWd/MTU)	Time (days)	a,b,c



**Figure 6-1:** PAD5 Topical Report Helium Release Models (BE, UB, and LB) and Saturated Release Data



**Figure 6-2:** Updated PAD5 Helium Release Models (BE, UB, and LB) and Saturated Release Data

**RAI-7 (parts d-f)**

The following are related to the calibration and validation of the code to measured fuel centerline temperatures.

RAI-7d – Please recalculate uncertainty (and 95/95 bounding relationships) using the additional and original (calibration and validation) data comparisons in terms of relative error (predicted-minus-measured/measured). All predicted-minus-measured temperature data comparisons should be provided as relative error (predicted-minus-measured/measured)

RAI-7e – Please provide plots similar to those in Figures A.2.1-20 to A.2.1-23 in terms of relative error on Y-axis that illustrates the upper bound 95/95 tolerance that includes all new and original (calibration and validation) fuel centerline data for open and closed gaps. Provide explicitly how the 95/95 tolerance values are determined.

RAI-7f – Are there any applications where the lower bound temperatures are applied? If so, provide similar plots for lower bound predictions at a 95/95 tolerance level (similar to RAI-7g). It is noted that the lower bound temperature curve [

] <sup>a,c</sup>

**Response to RAI-7d**

The PAD5 thermal database comprises a large number data points. [

] <sup>a,c</sup>

Table 7-1 contains the thermal calibration statistics for the PAD5 thermal database including all new and original (calibration and validation) data. [

] <sup>a,c</sup>

Table 7-1 Statistics for the Predicted Minus Measured (P-M) Residuals in the PAD5 Thermal Calibration and Validation									
Role	All Fuel			UO <sub>2</sub>			Gadolinia		
	Data Points	P-M Average (K)	P-M Standard Dev. (K)	Data Points	P-M Average (K)	P-M Standard Dev. (K)	Data Points	P-M Average (K)	P-M Standard Dev. (K)

a,b,c

With the newly added data in the responses to RAIs 7a through 7-c (Reference 7-3), it is observed that [ ]<sup>a,c</sup> Westinghouse has recalculated the thermal model uncertainties to account for the additional data included [ ]

[ ]<sup>a,c</sup>

Rather than develop [ ]

[ ]<sup>a,c</sup>

The updated upper-bound model is:

$$\left[ \begin{array}{l} T_{UB} \\ T_{LB} \end{array} \right] = \left[ \begin{array}{l} T_{BE} \\ T_{BE} \end{array} \right] + \left[ \begin{array}{l} T_{UB} \\ T_{LB} \end{array} \right] \quad (7-1)$$

and the updated lower-bound model is:

$$\left[ \begin{array}{l} T_{UB} \\ T_{LB} \end{array} \right] = \left[ \begin{array}{l} T_{BE} \\ T_{BE} \end{array} \right] - \left[ \begin{array}{l} T_{UB} \\ T_{LB} \end{array} \right] \quad (7-2)$$

where:

$T_{UB}$  is the upper-bound fuel centerline temperature in kelvins,

$T_{LB}$  is the lower-bound fuel centerline temperature in kelvins,

$T_{BE}$  is the best estimate fuel centerline temperature predicted with PAD5, in kelvins, and

[ ]<sup>a,c</sup>

The calculation of the bounding lines considered all the additional and original (calibration and validation) data [ ]

[ ]<sup>a,c</sup> The final bounding

models are shown in Eqs. (7-1) and (7-2). A graph of the calibration errors [ ]<sup>a,c</sup> together with these bounding models is presented in Figure 7-1. Graphs similar to those in Figures A.2.1-20 to A.2.1-23 in Reference 7-1 are presented in the responses to RAI's 7e and 7f.



**Figure 7-1:** Thermal Calibration Errors and Bounding Models Obtained in this Analysis [ ]<sup>a,c</sup>


[

] <sup>a,b,c</sup>

**Table 7-2: Number of Data Points and Percent of Data [ ]<sup>a,c</sup> Listed by Test [**

**] <sup>a,b,c</sup>**

**a, b, c**



It should be noted that the developed thermal uncertainties [

**] <sup>a,b,c</sup>**

[

**] <sup>a,c</sup>**

**Response to RAI-7e**

Figures 7-2 and 7-3 display graphs of the upper-bound biased relative errors versus LHGR and versus burnup, respectively. The graphs include all new and original (calibration and validation) fuel centerline data as provided in the responses to RAI-7a through 7c in Reference 7-3. In the graphs the data are segregated into open- and closed-gap data.

The graphs show that the updated PAD5 upper-bound thermal model uncertainties [

**] <sup>a,c</sup>**



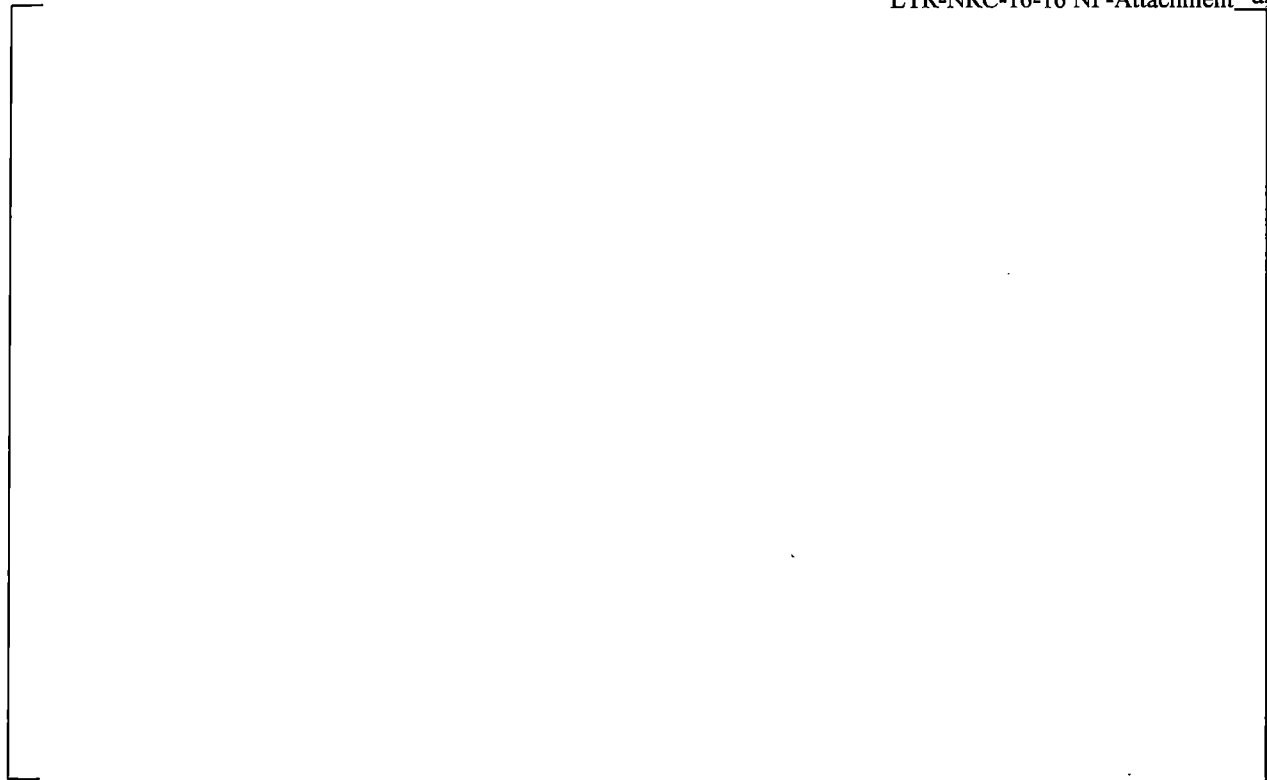
[  
conservatively accounts for the behavior of the predictions.

] <sup>a,c</sup>

a, b, c



**Figure 7-2:** Upper-Bound Fuel Centerline Temperatures (Predicted Minus Measured)/Measured vs. LHGR.



**Figure 7-3:** Upper-Bound Fuel Centerline Temperatures (Predicted Minus Measured)/Measured vs. Burnup.

#### **Response to RAI-7f**

The lower-bound thermal uncertainties are used to provide input to non-LOCA safety analyses. Figures 7-4 and 7-5 display graphs of the lower-bound biased relative errors versus LHGR and versus burnup, respectively. The graphs include all new and original (calibration and validation) fuel centerline data as provided in the responses to RAI-7a through 7c in Reference 7-3. In the graphs the data are segregated into open- and closed-gap data.

The graphs show that the updated PAD5 lower-bound thermal model uncertainties [

] <sup>a,c</sup>



**Figure 7-4:** Lower-Bound Fuel Centerline Temperatures (Predicted Minus Measured)/Measured vs. LHGR.



**Figure 7-5:** Lower-Bound Fuel Centerline Temperatures (Predicted Minus Measured)/Measured vs. Burnup.

**References**

- 7-1. WCAP-17642, "Westinghouse Performance Analysis and Design Model (PAD5), October 2013.
- 7-2. ISO 16269-6, "Statistical interpretation of data – Part 6: Determination of statistical tolerance intervals," January 2014.
- 7-3. LTR-NRC-16-5, Response to the 120 day RAIs from RAI Set 2 for WCAP-17642, "Westinghouse Performance Analysis and Design Model (PAD5)" (Proprietary/Non-Proprietary), February 2016.
- 7-4. LTR-NRC-15-87, "Response to the 60 day RAIs from RAI Set 2 for WCAP-17642, "Westinghouse Performance Analysis and Design Model (PAD5)" (Proprietary/Non-Proprietary)," October 2015.
- 7-5. HWR-1038, "The Gadolinia fuel test IFA-681: Overview of in-pile measurements from beginning of irradiation to unloading," March 2013.
- 7-6. HWR-1080, "Data uncertainties in experiments and modelling – workshop minutes," November, 2013.
- 7-7. HWR-1141, "Monte Carlo uncertainty and sensitivity analysis of the power determination in a Halden test rig containing multiple rods," December 2014.

**RAI-8 (part c)**

The following are related to the modeling, calibration and validation of the code to measured fission gas release.

RAI-8c – The standard approach used by the NRC for fuel performance is to bound the data with a 95/95 tolerance level, [ ]<sup>a,c</sup>. Past uncertainty calculations for codes reviewed by NRC have been based on release [ ]<sup>a,c</sup> because this is the release range in which the peak rod pressures are calculated to demonstrate that the rod pressure limit is met. Utilizing values [ ]<sup>a,c</sup> reduces the standard error for release values [ ]<sup>a,c</sup>, this reduced error including the [ ]<sup>a,c</sup> are not applicable to [ ]<sup>a,c</sup> release. The gadolinia release model [ ]<sup>a,c</sup>. The upper and lower bound gadolinia release models should significantly bound all [ ]

[ ]<sup>a,c</sup>. Please provide justification why the UO<sub>2</sub> and gadolinia fission gas release models [ ]<sup>a,c</sup>.

**Response to RAI-8c**

PAD5 thermal FGR uncertainty model is based on [ ]

[ ]<sup>a,c</sup> Including these data is appropriate for PAD5 [ ]<sup>a,c</sup> uncertainty model. However, it is recognized that these data will decrease the standard deviation of [ ]<sup>a,c</sup> and should not be used when 95/95 statistical analysis on [ ]<sup>a,c</sup> is performed.

In the PAD5 thermal FGR database [ ]

[ ]<sup>a,b,c</sup>

Table 8-1 summarizes [ ]

[ ]<sup>a,b,c</sup>

It should be noted that [ ]

[ ]<sup>a,b,c</sup>

Additionally, the PAD5 FGR model uncertainty included [

] <sup>a,c</sup>

The gadolinia thermal FGR model uncertainties (including steady-state and transient FGR) are based on [

] <sup>a,b,c</sup>

In summary, the PAD5 thermal FGR model uncertainties are conservative for application because

1) [

] <sup>a,c</sup>

2) [

] <sup>a,c</sup>

**Updates to Section A.2.2 of PAD5 Topical Report:**

[

] <sup>a,b,c</sup>

**References**

- 8-1.ISO 16269-6, “Statistical Interpretation of Data – Part 6: Determination of Statistical Tolerance Intervals,” January 2014.
- 8-2.NUREG-1475, Revision 1, “Applying Statistics,” U.S. NRC, March 2011.
- 8-3.DOE/NE/34032-1, “Final Report of the Super-Ramp Project,” June 1985.

**Table 8-1: Thermal FGR Data Excluding Plants AA and Z Fuel**

Rod Name	Time	Burnup	Measured	Predicted	P - M
	h	MWd/MTU	%	%	%

a,b,c

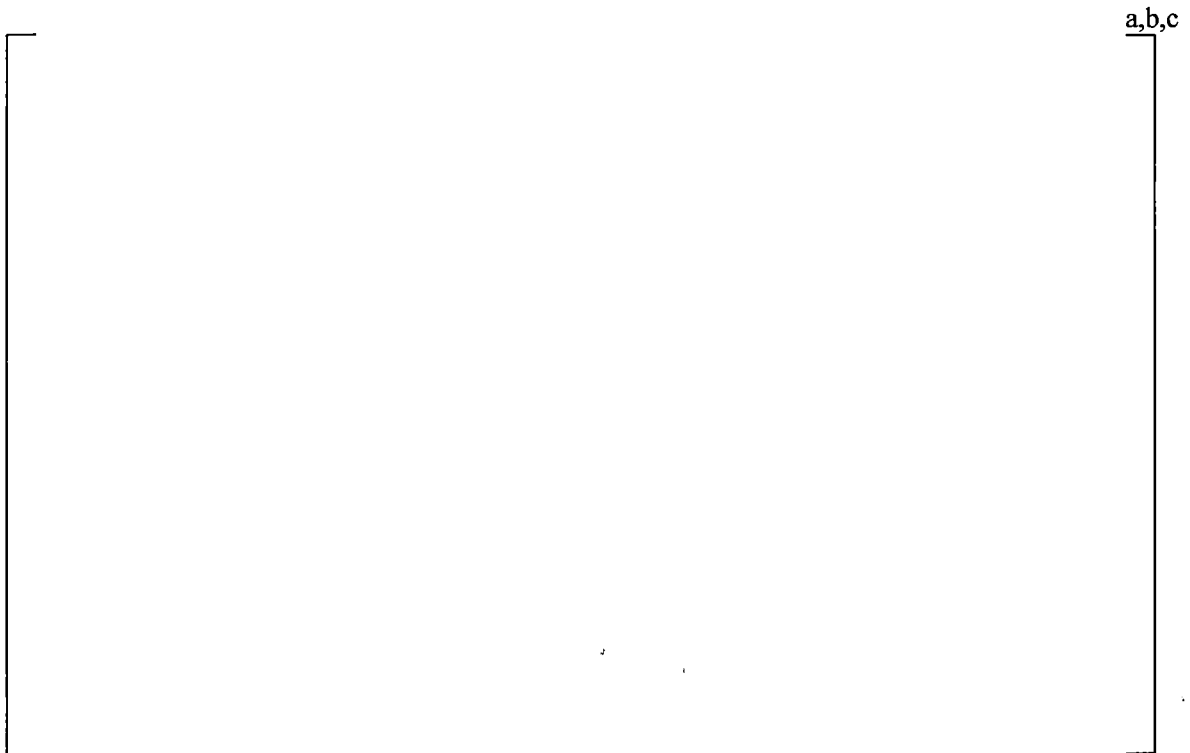


**Figure 8-1:** Predicated vs. Measured FGR for Plant AA and Z Data and More Recent Data

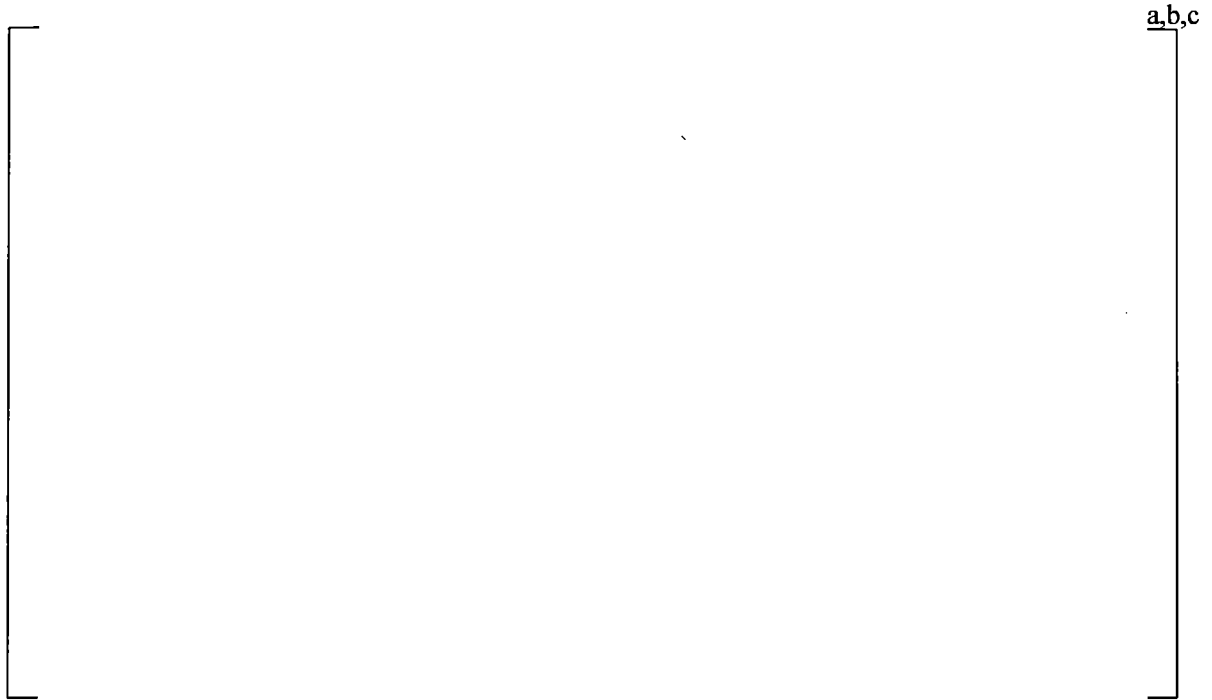




**Figure 8-2:** Comparison of PAD5 UB Thermal FGR Results to 95/95 UB Results versus BE Predicted FGR



**Figure 8-3:** Comparison of PAD5 UB Thermal FGR Results to 95/95 UB Results versus Measured FGR



**Figure 8-4:** Comparison of PAD5 LB Thermal FGR Results to 95/95 LB Results versus BE Predicted FGR



**Figure 8-5:** Comparison of PAD5 LB Thermal FGR Results to 95/95 LB Results versus Measured FGR



**Figure 8-6:** Comparison of PAD5 Transient FGR Results between  $UO_2$  and Gadolinia Fuel

**RAI-9 (part i)**

The following are related to the modeling and calibration/verification of the code to cladding creep data for normal operation.

RAI-9i - Please provide plots similar to Figures A.2.3-14 thru A.2.3-17 identifying the number of rods and data points in these plots using data from RAI-9h responses and the calibration/validation data. Also identify those rods and number of data that are not bounded. Please provide an upper and lower bound at a 95/95 tolerance level for each alloy along with a plot demonstrating these bounds similar to Figures A.2.3-14 thru A.2.3-17.

**Response to RAI-9i**

The requested plots are shown in Figures 9-1 and 9-2 for ZIRLO® and **Optimized ZIRLO™** and Figures 9-3 and 9-4 for Zircaloy-4, identifying data by plants. The number of rods, data points, and data points not bounded are listed in Table 9-1 for ZIRLO and **Optimized ZIRLO** rods, and Table 9-2 for Zircaloy-4 rods.

PAD5 cladding creep model uncertainties use [

] <sup>a,c</sup>

For ZIRLO and **Optimized ZIRLO** cladding, some of the data not bounded are [

] <sup>a,c</sup>

The results are shown in Table 9-3. PAD5 UB and LB ACREEP values are more conservative than the 95/95 tolerance intervals based on [

] <sup>a,c</sup>

For Zircaloy-4 rods, the uncertainties are impacted by [

] <sup>a,c</sup>

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[

The results are shown in Table 9-4. PAD5 UB and LB ACREEP values are more conservative than the 95/95 tolerance intervals based on [ ]<sup>a,c</sup>

In summary, some of the data used in creep model uncertainty development are [

] <sup>a,c</sup>

Additionally, real uncertainties in creep model should be significantly smaller as shown by [

] <sup>a,c</sup>

**References**

- 9-1. ISO 16269-6, “Statistical Interpretation of Data – Part 6: Determination of Statistical Tolerance Intervals,” January 2014.
- 9-2. George, F. and Ramachandran, K. M., “Estimation of Parameters of Johnson’s System of Distributions,” Journal of Modern Applied Statistical Methods, November 2011, Vol. 10, No. 2, 494-504.

**Table 9-1: ZIRLO/Optimized ZIRLO Creep Data by Plants**

	Rods	Data Points	UB - Not Bounded	LB - Not Bounded	a,b,c

**Table 9-2: Zircaloy-4 Creep Data by Plants**

	Rods	Data	UB - Not Bounded	LB - Not Bounded	a,b,c

**Table 9-3: ZIRLO/Optimized ZIRLO Creep Statistical Results**

	LB ACREEP	UB ACREEP	a,b,c

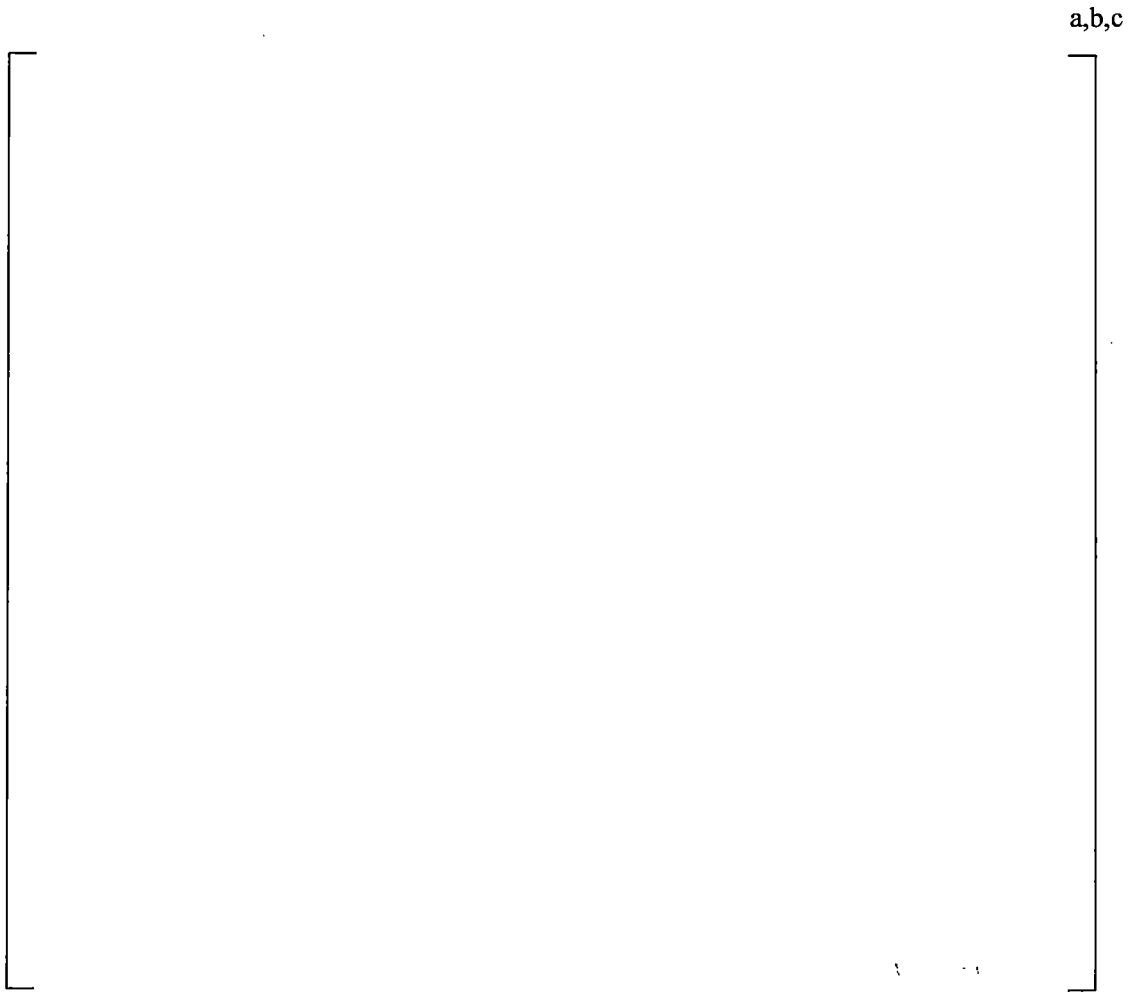
**Table 9-4: Zircaloy-4 Creep Statistical Results**

	LB ACREEP	UB ACREEP	a,b,c

a,b,c



**Figure 9-1:** ZIRLO and **Optimized ZIRLO** Cladding Creep Upper Bound Predictions



**Figure 9-2: ZIRLO and Optimized ZIRLO Cladding Creep Lower Bound Predictions**





**Figure 9-3:** Zircaloy-4 Cladding Creep Upper Bound Predictions

a,b,c



**Figure 9-4:** Zircaloy-4 Cladding Creep Lower Bound Predictions

**RAI-10 (part f)**

Provide a plot of upper bound uncertainty for ramped rods with [

] <sup>a,c</sup> that are bounded at a 95/95 tolerance level.

**Response to RAI-10f**

[

Section A.2.4.3 of the PAD5 topical report (Reference 10-1), [

] <sup>a,c</sup> As shown in

] <sup>a,c</sup>

Additionally, the PAD5 ramp diameter change model uncertainty included [

] <sup>a,b,c</sup>

As explained above, the upper bound uncertainty of [

requested for the UB uncertainty in Figure 10-1.

] <sup>a,c</sup> a plot is provided as

**References**

- 10-1. WCAP-17642-P, "Westinghouse Performance Analysis and Design Model (PAD5)," October 2013.
- 10-2. STIR-53 "Final Report of the Inter-Ramp Project," August 1979.
- 10-3. RISO-FGP3-FINAL, Pt. 2, "The Third Riso Fission Gas Project, Final Report: The Methods," March 1991.
- 10-4. STUDSVIK/N-05/154, STUDSVIK-SCIP-42, "SCIP, Task 0; Ramp Test Results," Final Report, December 2005.

a,b,c



**Figure 10-1:** UB Predicted Diameter Change vs Measured Diameter Change