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| FROM: Florida Power & Light Co. Miami, Fla Robert E. Uhrig | | DATE OF DOC 3-13-75 | DATE REC'D 3-17-75 | LTR xxx | TWX | RPT | OTHER |
| TO: Mr. Edson G. Case | | ORIG 1-signed | CC | OTHER | SENT AEC PDR <u>xxxxx</u> | | |
| | | | | | SENT LOCAL PDR <u>xxxx</u> | | |
| CLASS | UNCLASS | PROP INFO | INPUT | NO CYS REC'D 1 | DOCKET NO: <u>50-250</u> & 50-251 | | |
| DESCRIPTION: Ltr ref WASH-1270 furn requested info concerning ATWS trans the following: | | | | ENCLOSURES: ATWS Analysis for Turkey Point No. 3 & 4 ACKNOWLEDGED DO NOT REMOVE | | | |
| PLANT NAME: Turkey Point #3 & 4 | | | | | | | |

FOR ACTION/INFORMATION 3-19-75 JGB

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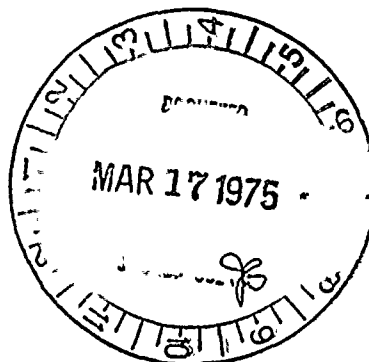
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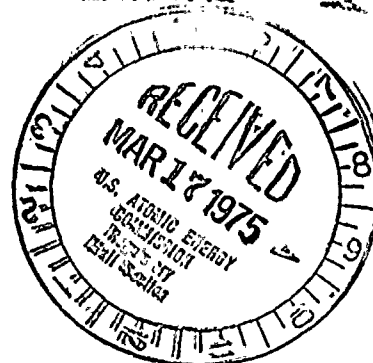
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FLORIDA POWER & LIGHT COMPANY

March 13, 1975
L-75-129

Regulatory File Cl.



Mr. Edson G. Case, Acting Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Case:

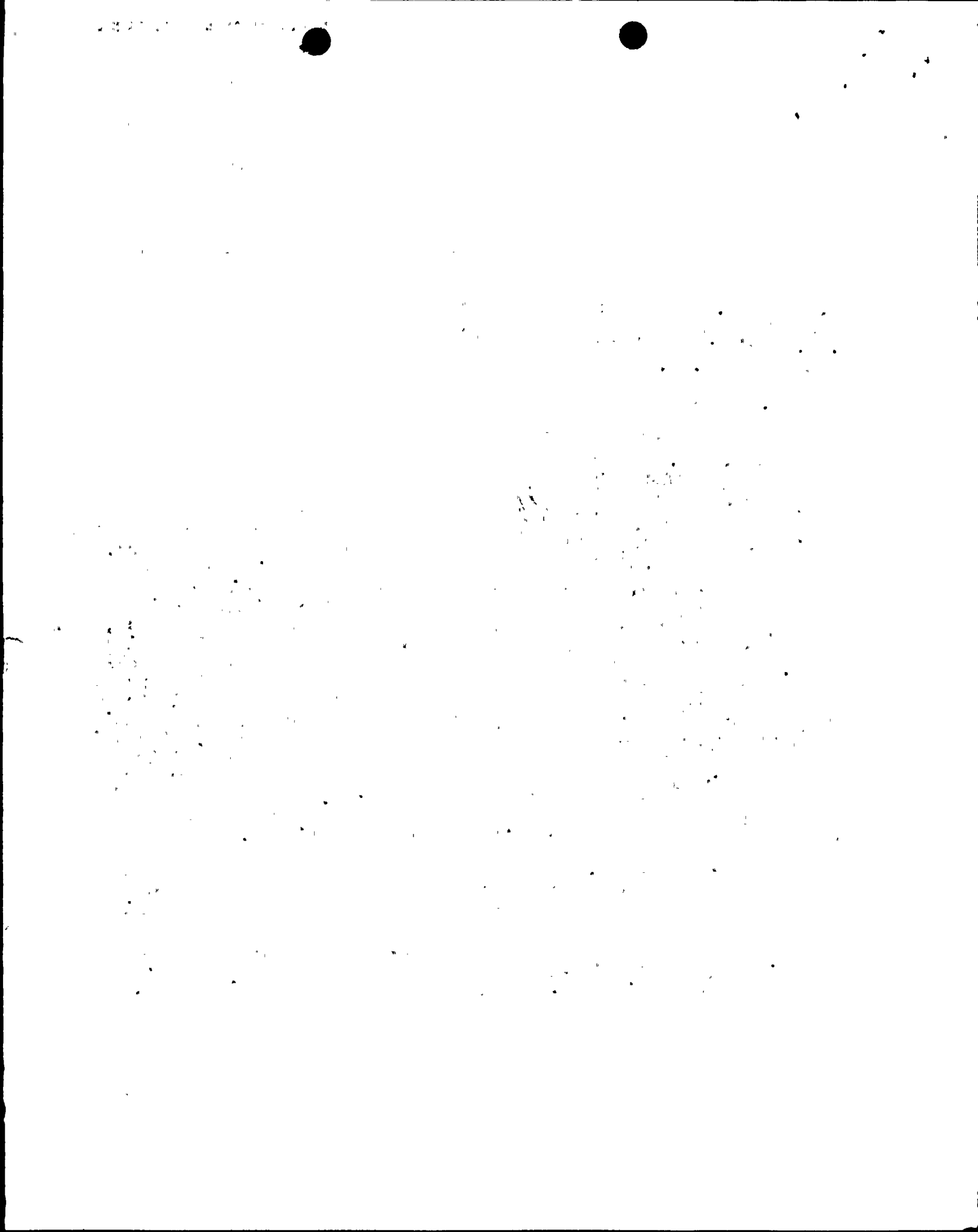
Re: Turkey Point Plant Units 3 & 4
Docket Nos. 50-250 & 50-251
ATWT Analysis

The AEC technical report WASH-1270 requests that all plants falling under Section IC, Category 1, of the Regulatory Staff ATWT position submit analyses of the consequences of ATWT events. Florida Power & Light Company, in compliance with this request, wishes to advise you that we are referencing the Westinghouse topical report, WCAP-8404, "Anticipated Transient Without Trip Analysis for Westinghouse PWR's With 44 Series Steam Generators", September, 1974, as the analysis applicable to Turkey Point Units 3 & 4. The method of analysis, models and computer codes as well as other pertinent information are presented in the Westinghouse topical report, WCAP-8330, "Westinghouse Anticipated Transients Without Trip Analysis", August, 1974, which we are also referencing as applicable to Turkey Point Units 3 & 4 in these areas. Appendix B of WCAP-8330 (post ATWT shutdown) demonstrates the capability of the Westinghouse NSSS to achieve a safe shutdown by operator action following the most limiting ATWT event. Appendices D and E demonstrate that peak containment pressure and radiological consequences of an ATWT are within acceptable limits.

We have reviewed the subject reports and have determined that the analyses and parameters listed in WCAP-8404 for the three loop plant represent the Turkey Point Units 3 & 4 with the following qualifications:

1. As shown in Table 1, the reactivity insertion rate for Turkey Point Units 3 & 4 can be as high as 0.46% $\Delta k/k$, while the analysis of the Rod Withdrawal at Power for

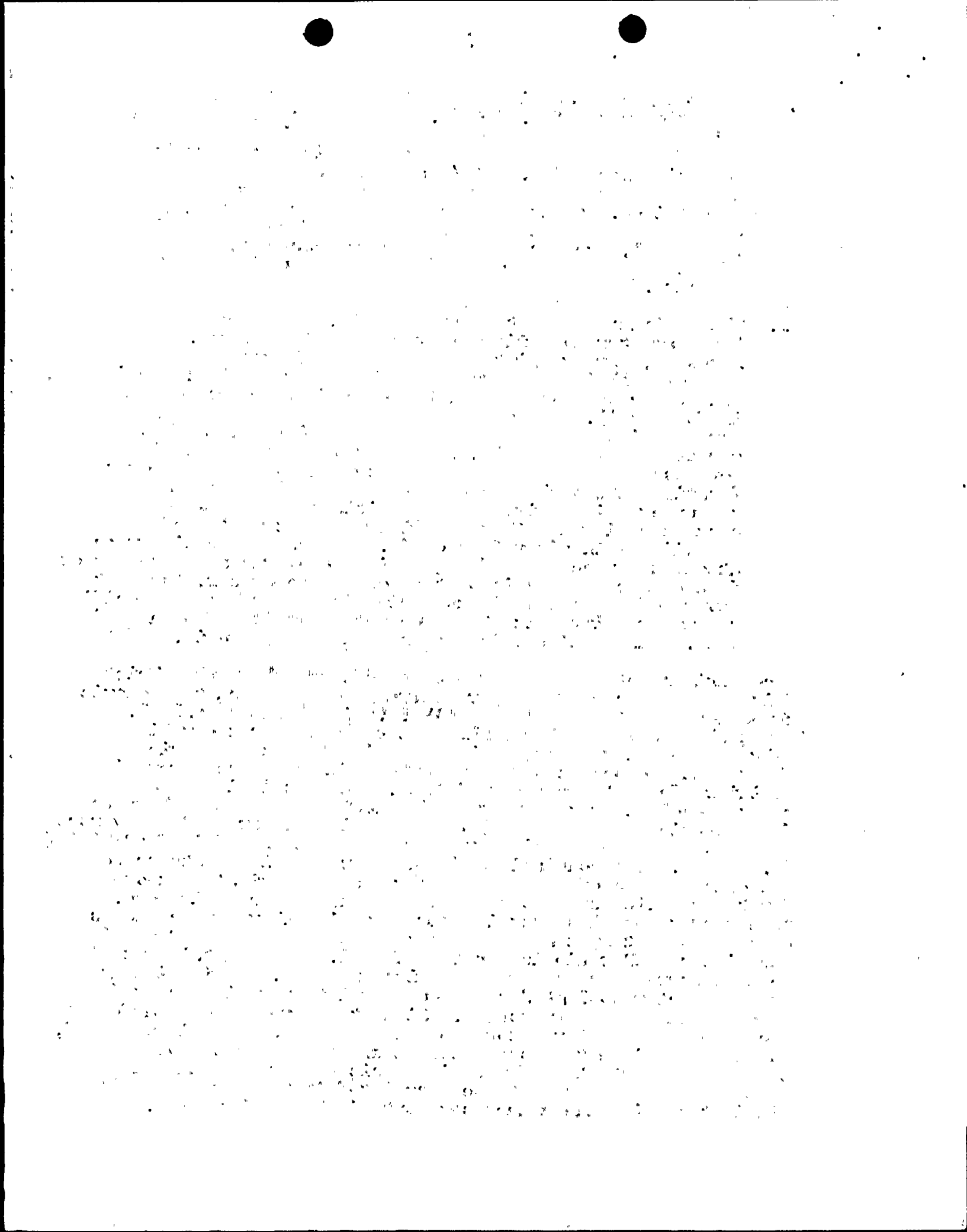
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a three loop plant in WCAP-8404 was performed for an insertion rate of 0.3% $\Delta k/k$. However, the Turkey Point Units 3 & 4 parameter is bound by a sensitivity study in WCAP-8404 which showed that even with a reactivity insertion rate of 0.5% $\Delta k/k$ a satisfactory DNB ratio and an acceptable peak primary system pressure would be obtained. Additional sensitivity studies reported in WCAP-8404 show that other minor differences noted in Table 1, such as steam generator mass have a minimal effect on DNB margin or maximum reactor coolant system pressure.

2. The auxiliary feedwater pumps for Turkey Point Units 3 & 4 are turbine driven instead of motor driven. As a result, Turkey Point Units 3 & 4 auxiliary feedwater reaches full flow in just under 180 seconds (instead of the 60 seconds assumed for the three loop reference case in WCAP-8404). The auxiliary feedwater flow rate for Turkey Point may be as low as 600 gpm (instead of 1200 gpm assumed in WCAP-8404). As a result, the analysis for Loss of Load, Loss of Feedwater and Loss of AC Power (Station Blackout) presented in WCAP-8404 do not conform to Turkey Point Units 3 & 4 conditions as in each case the assumption is made that auxiliary feedwater flow of 1200 gpm will begin after 60 seconds. To assure a valid evaluation, the reactor vendor (Westinghouse) was asked to perform an additional analysis of the Loss of Feedwater, the most severe of these transients, using input parameters specific to Turkey Point Units 3 & 4 operating at 2300 MW_t and 2250 psia. This analysis is presented in the Appendix.

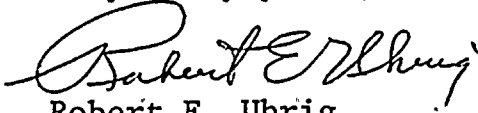
A comparison between the parameters used for the Turkey Point Units 3 & 4 Loss of Feedwater Analysis and those of the generic three loop plant analysis of WCAP-8404 is shown in Table 1. The table shows that the Turkey Point power operated relief valves have a larger steam flow capacity than the generic plant which compensates to some extent for the less favorable auxiliary feedwater characteristics. The result is a peak reactor coolant system pressure (including an 80 psi allowance for elevation and pump head) of 2991 psia for Turkey Point versus 2967 psia for the generic three loop plant analyzed in WCAP-8404 (p. 4-169). The conclusions for the Turkey Point Units as to the consequences of an ATWT are therefore identical to those for the generic study as summarized at the end of WCAP-8404. "The results of these studies show that in all reference cases Reactor Coolant System peak pressure does not exceed 3000 psia, the minimum DNB ratio is not less than 1.0, and containment peak pressure does not exceed design pressure. No impairment of the Reactor Coolant System boundary integrity is expected based on these peak pressures. Since the core thermal performance, the volume of reactor coolant and secondary fluid released, and the containment pressure transient are all less severe for these ATWT events than for design basis conditions, the radiological consequences of these postulated ATWT events are well within the guideline values set forth in 10 CFR Part 100."



In addition to analyses of the plant to demonstrate the consequences of an ATWT, WASH-1270 requests that a review of the reactor protection system be performed to assess the system susceptibility to common mode failure. These analyses have been previously performed for the relay logic protection system by Westinghouse and are documented in WCAP-7486, "An Evaluation of Anticipated Operational Transients in Westinghouse PWR's", May, 1971.

In view of the results reported in WCAP-8404 and WCAP-7486 and the results of the plant specific analysis for the Loss of Feedwater ATWT for Turkey Point, and in recognition of the low likelihood of occurrence of these hypothetical ATWT events, we believe that no modifications of Turkey Point Units 3 & 4 are required to mitigate the consequences of an ATWT.

Very truly yours,


Robert E. Uhrig
Vice President

REU:nch

cc: Mr. Jack R. Newman

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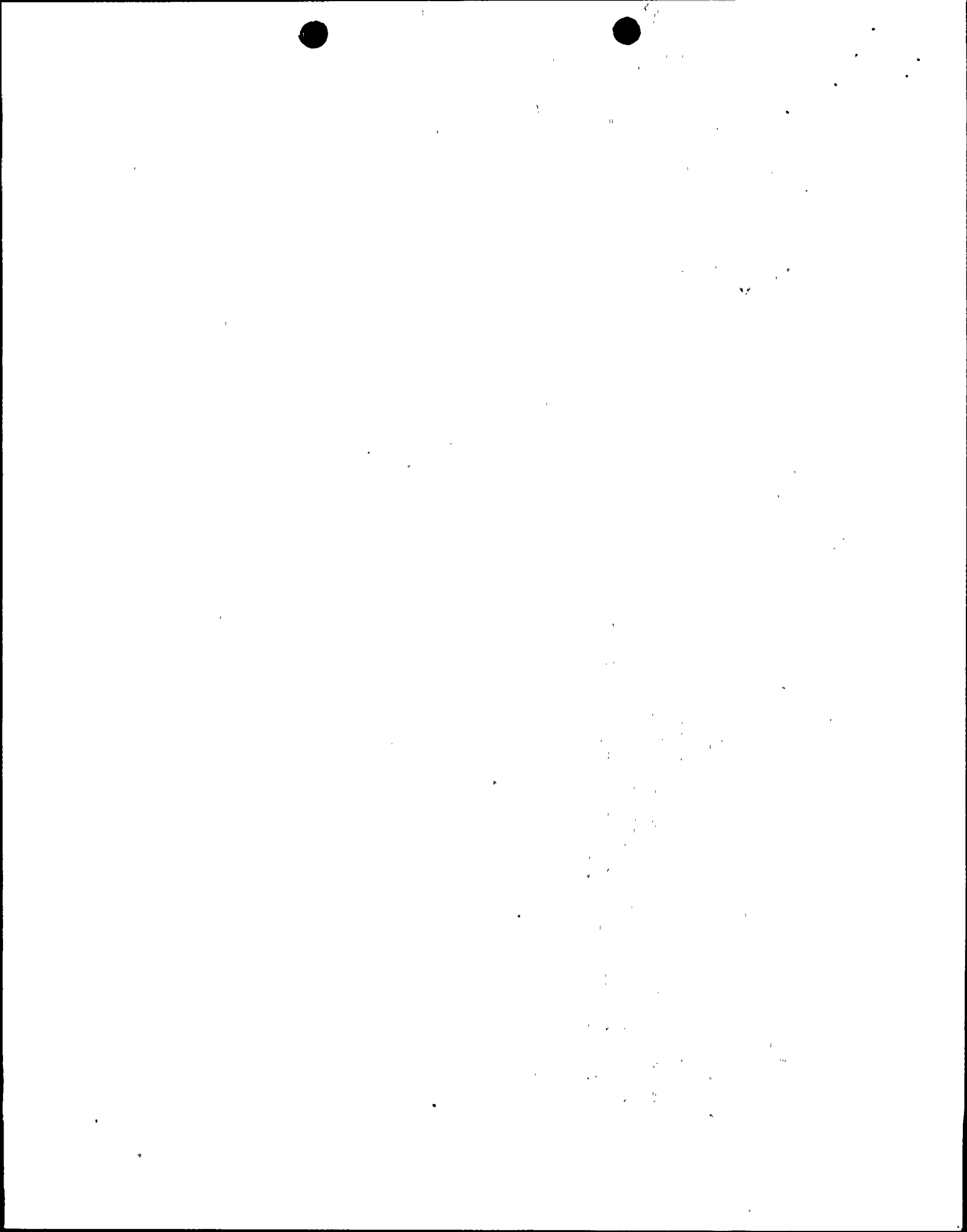
TABLE 1

| <u>Parameter</u> | <u>WCAP-8404 ATWT Model</u> | <u>Re-Analysis of Turkey Point Units 3 & 4</u> |
|--|---------------------------------|--|
| Steam Generator Type | 44 series | 44 series |
| Number of Loops | 3 | 3 |
| Core Power (MW_t) | 2300 | 2300 |
| Nominal Pressurizer Pressure (psia) | 2250 | 2250 |
| Nominal Coolant Flow (gpm per loop) | 89,500 | 88,500 |
| Nominal Average Coolant Temperature (F) | 575.5 | 575.5 |
| Nominal Coolant No-load Temperature (F) | 547 | 547 |
| Total RCS Volume Including Pressurizer and Surge Line (ft^3) | 9072 | 9343 |
| Total Volume of Pressurizer and Surge Line (ft^3) | 1328.6 | 1328.6 |
| Number of Power Operated Relief Valves | 2 | 2 |
| Steam Capacity of Each Power Operated Relief Valve @ 2350 psia (lb/hr) | 179,000 | 210,000 |
| Number of Safety Valves | 3 | 3 |
| Steam Capacity of Each Safety Valve (lb/hr @ 2500 psia) | 288,000 | 288,000 |
| Best Estimate Rod Worth of Bank D at its Full Power Insertion Limit ($\% \Delta k/k$) | 0.3 | 0.46 (BOL-70%) 0.34 (70%-EOL) |
| Steam Generator Design Pressure (psia) | 1100 | 1100 |
| Steam Generator Nominal Steam Temperature (F) | 523 | 516.1 |
| Nominal Steam Flow (lb/sec) | 2832 | 2798.7 |
| Nominal Feedwater Temperature (F) | 446.6 | 441.2 |
| Nominal Fluid Mass in Steam Generator (lb) | 238,500 | 236,340 |

1300

TABLE 1 (cont'd.)

| <u>Parameter</u> | <u>WCAP-8404 ATWT Model</u> | <u>Turkey Point Units 3 & 4</u> |
|---|---------------------------------|---|
| Auxiliary Feedwater Temperature (F) | 130 | <120 |
| Auxiliary Feedwater Available (gal) | 140,000 | 185,000 |
| Capacity of Auxiliary Feedwater (gpm) | 1200 | 600 |
| Auxiliary Feedwater Initiation Time (sec) | 60 | 180 |
| Volume of Line Between Auxiliary Feedwater Connection on Feedline and Steam Generator Inlet; Total for all Loops (ft ³) | 500 | 317 |



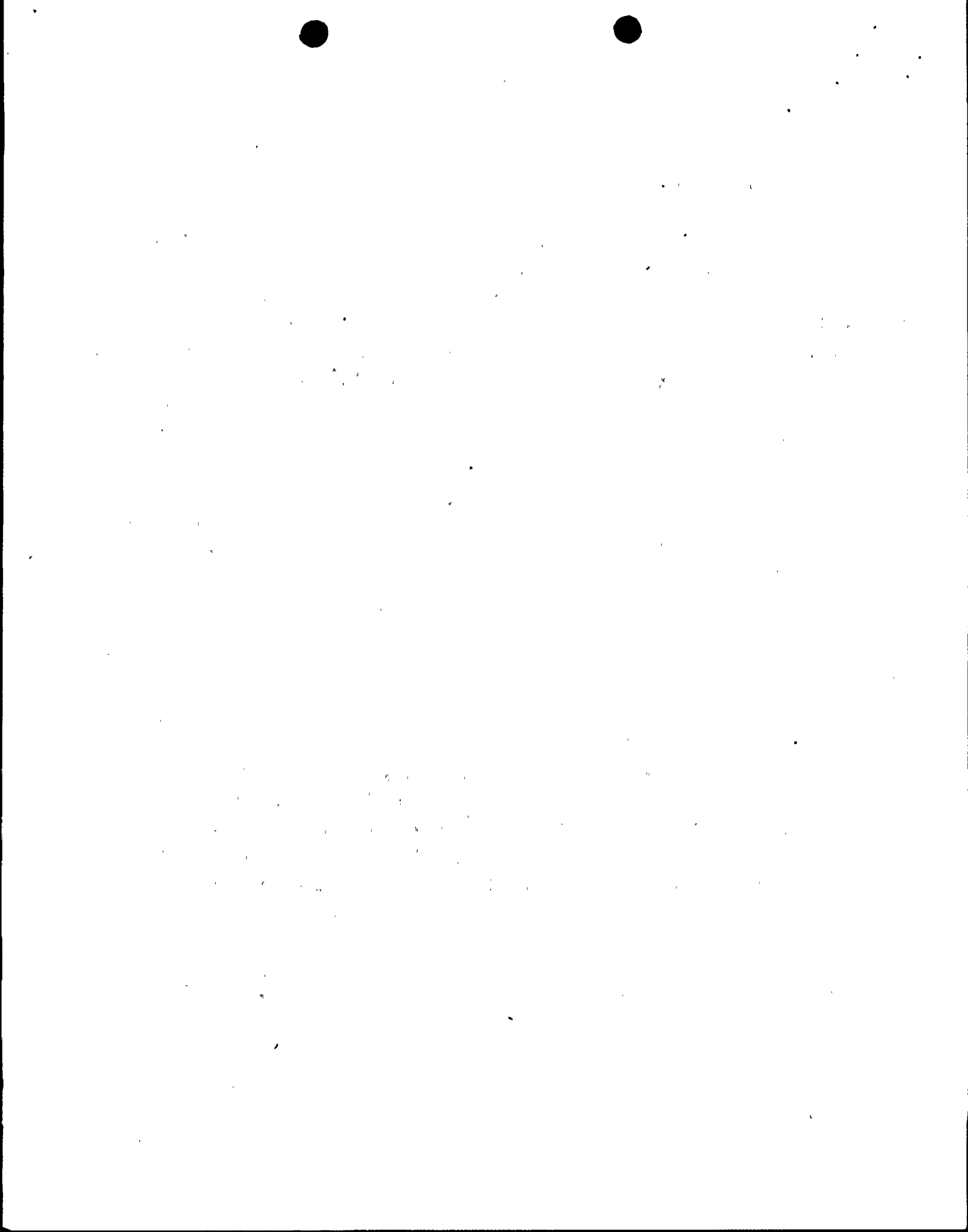
APPENDIX

Loss of Feedwater ATWT for Turkey Point Units 3&4

Loss of normal feedwater could result from a malfunction in the feedwater condensate system or its control system from such causes as simultaneous trip of both condensate pumps, simultaneous trip of both main feedwater pumps (or closure of their discharge valves), or simultaneous closure of all feedwater control valves. The vast majority of these cases would cause only a partial loss of feedwater flow. The most likely cause of a complete loss of feedwater would be a loss of station power (station blackout). Notwithstanding the low probability of occurrence, a complete loss of normal feedwater is evaluated with the additional assumption that a non-mechanistic common mode failure prevents rods from dropping into the core.

The loss of main feedwater produces a large imbalance in the heat source/sink relationship. When feedwater flow to the steam generators is terminated, the secondary system can no longer remove all of the heat that is generated in the reactor core. This heat buildup in the primary system is indicated by rising Reactor Coolant System temperature and pressure, and by increasing pressurizer water level, which is due to the insurge of expanding reactor coolant. Water level in the steam generators drops as the remaining water in the secondary system, unreplenished by the main feedwater flow, is boiled off. When the steam generator water level falls to the point where the steam generator tubes are exposed and primary-to-secondary system heat transfer is reduced, the reactor coolant temperature and pressure begin to increase at a greater rate. This greater rate of primary system temperature and pressure increase is maintained as the pressurizer fills and releases water through the safety and relief valves. (The safety and relief valves have a smaller volumetric relief capacity for water than for steam.) Reactivity feedback, due to the high primary system temperature reduces core power. The system pressure begins to decrease and a steam space is again formed in the pressurizer.

The loss of feedwater ATWT involves a heat source/sink mismatch; therefore, the peak pressure attained in the primary system depends upon the



ability of the pressurizer safety and relief valves to release the reactor coolant volumetric insurge to the pressurizer. The volumetric relief capacities of these valves are reduced when the pressurizer fills and water is passed instead of steam. During a loss of feedwater ATWT, the heat source/sink mismatch causes the reactor coolant temperature and coolant expansion rate to increase and the core reactivity and power to drop. Reduction of the pressurizer safety and relief valve volumetric relief capacity (due to filling the pressurizer and relieving water) early in the transient when core power is still relatively high, will result in a higher peak Reactor Coolant System pressure than the peak pressure that would result from reduction of pressurizer relief and safety valve capacity later in the transient, when core power is lower.

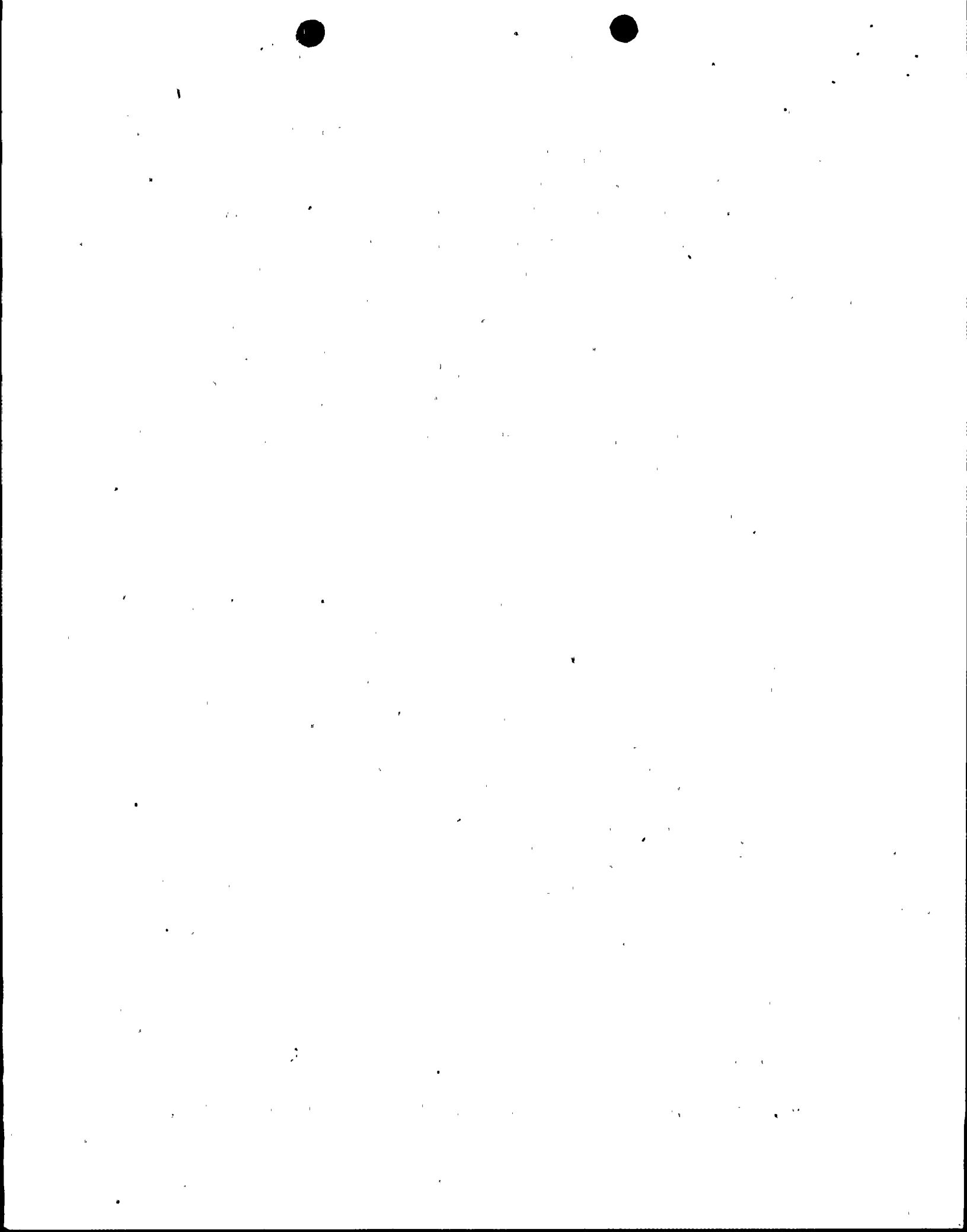
For protection against the effects of a loss of feedwater, the reactor would be tripped when any of the following conditions are reached:

- ° Steam/feedwater flow mismatch (low feedwater flow) and low steam generator water level (40% mismatch and 25% of narrow span, respectively)
- ° Overtemperature Delta T reactor trip
- ° High pressurizer pressure (2400 psia)
- ° High pressurizer level (92% of span)
- ° Steam generator low-low water level (10% of narrow span)
- ° Low reactor coolant flow (90% of nominal)

Analysis of Effects and Consequences

The following assumptions were made in the analysis:

- ° Initial normal full power operation early in core life. Since



the negative temperature coefficient of reactivity reduces core power as the coolant temperature rises, and the temperature coefficient becomes more negative with core life, the ATWT loss of feed is less severe later in core life. The reactivity coefficients are the same as those used in WCAP-8404.*

°Normal operation of the following control systems:

- 1) Pressurizer pressure control, including heaters, spray, and both the power-operated and the spring-loaded valves.
- 2) Turbine governor valves in impulse pressure control prior to trip, and valve closure on turbine trip.
- 3) Steam dump to condenser at 40% of rated turbine flow following turbine trip.

°Turbine trip 30 seconds after loss of feed (this is after generation of a reactor and turbine trip signal on low steam generator water level in coincidence with steam/feed flow mismatch)

°No credit for automatic reactor trip

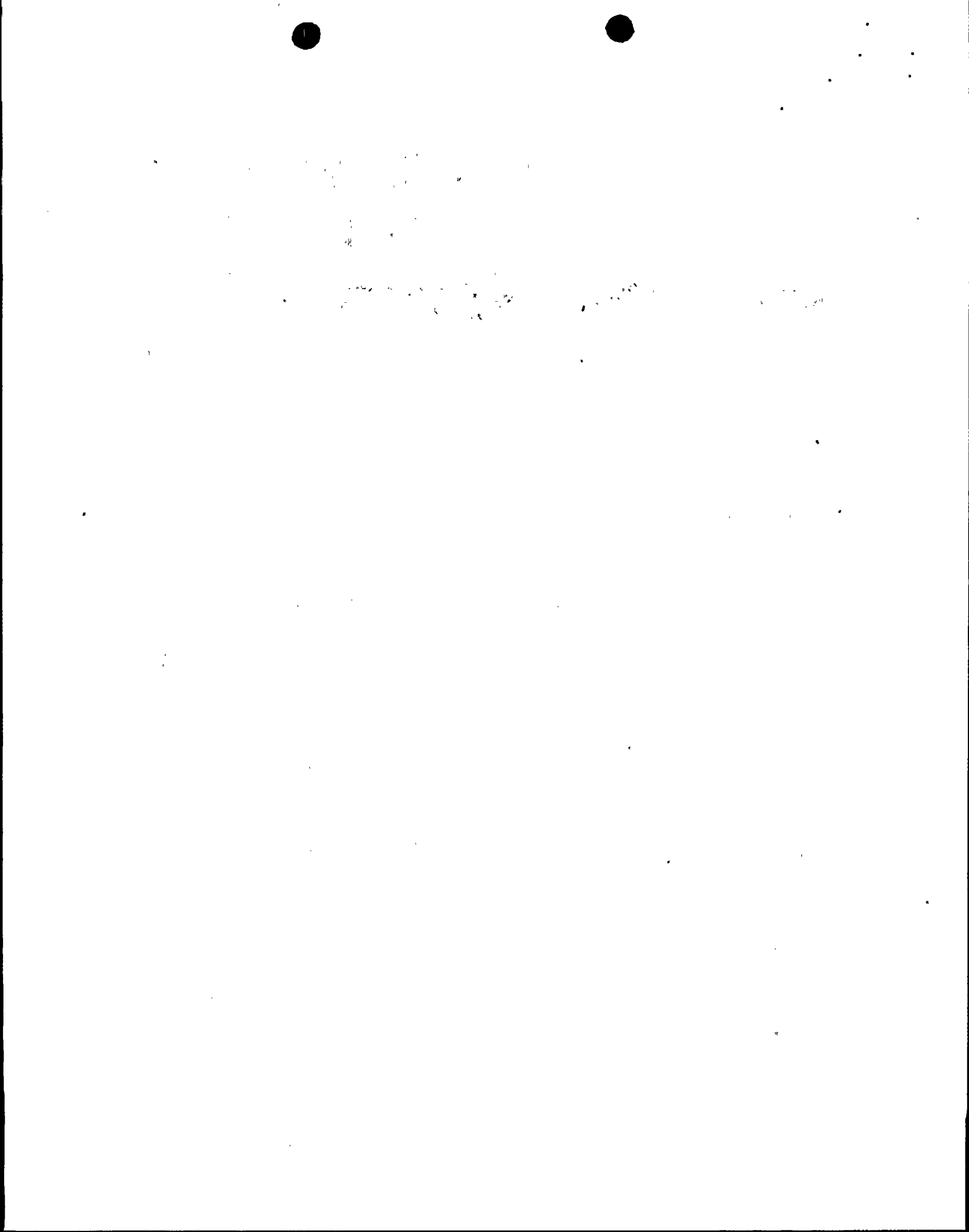
°No credit for automatic control rod insertion as reactor coolant temperature rises

°Main feedwater flow falls to zero in the first 4 seconds of the transient, with no main feed after that time.

°Auxiliary feedwater flow begins at 180 seconds, at a rate of 600 gpm.

°Auxiliary feedwater is injected into the feedwater pipe at a temperature of 120°F, 317 ft³ upstream of the steam generator, such that the cooler water enters the steam generator after this volume is purged.

*WCAP-8404, "Anticipated Transients Without Trip Analysis for Westinghouse PWR's with 44 Series Steam Generators", September, 1974.



°Primary-to-secondary heat transfer area is reduced as the steam generator shell-side water inventory drops below the value necessary to wet the tubes.

°A list of the important plant parameters are given in Table 1.

Results

The peak pressure in the Reactor Coolant System was 2911 psia and occurred approximately 113 seconds after the termination of feedwater supply to the steam generators. The pressurizer reached a peak pressure of 2875 psia at the same time.

The chronology of events for this case is shown in Table 2 and transient plots are presented in Figures 1 through 12.

Figure 2 depicts the primary system mass flow rate as a fraction of nominal. The gradual drop in flow rate, before pump cavitation occurs, is due to coolant expansion (drop in density). The volumetric flow rate, however, is relatively constant before the pump is assumed to cavitate.

In addition to the automatic reactor trips, the operator may shutdown the reactor with emergency boration or safety injection.

Conclusions

The DNB ratio for the hot channel increases above its initial value during the transient. The peak Reactor Coolant System pressure (including a 80 psi allowance for elevation and pump head) is 2991 psia. Based on these results, no core damage or impairment of the Reactor Coolant System integrity is expected for the loss of feedwater ATWT.

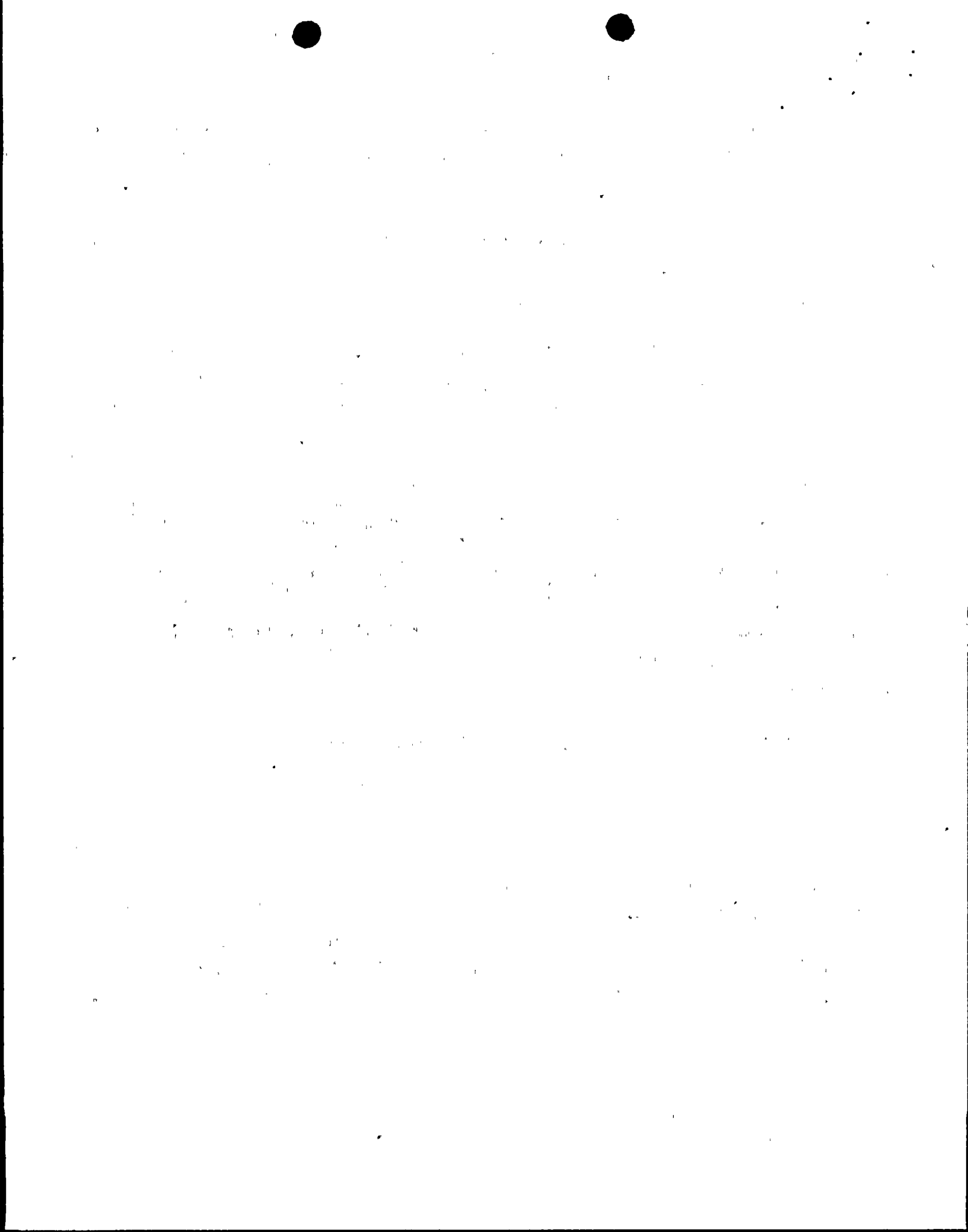


TABLE 1TURKEY POINT PARAMETERS FOR ATWT ANALYSIS

| <u>Parameters</u> | <u>Value</u> |
|--|---------------|
| Core: | |
| Core power (MW_t) | 2300 |
| Core length (ft) | 12 |
| Number of assemblies | 157 |
| Reactor Coolant System: | |
| Total volume (ft^3) including pressurizer and surge line | 9343 |
| Nominal ^a pressure (psia) | 2250 |
| Nominal ^a flow (gpm) | 265,500 |
| Nominal ^a average temperature ($^{\circ}F$) | 575.45 |
| No-load temperature ($^{\circ}F$) | 547 |
| Nominal ^a reactor vessel inlet temperature ($^{\circ}F$) | 546.2 |
| Nominal ^a reactor vessel outlet temperature ($^{\circ}F$) | 604.7 |
| Pressurizer: | |
| Total volume of pressurizer and surge line (ft^3) | 1328.6 |
| Nominal ^a water volume (ft^3) | 808 |
| Heater capacity (kw) | 1300 |
| Maximum spray rate (lbs/sec) | 63.1 |
| Power-operated relief valve steam flow capacity (lbs/hr) (at 2350 psia) | 2-210,000 ea. |
| Safety valve steam flow capacity (lbs/hr) (at 2500 psia) | 3-288,000 ea. |
| Power-operated relief valve opening pressure (psia) | 2350 |
| Safety valve, start open-full open pressure (psia) | 2515-2590 |
| Secondary System: | |
| Steam generator (SG) type | 44 |
| SG design pressure (psia) | 1100 |
| Nominal ^a steam pressure (psia) | 785 |
| No-load steam pressure (psia) | 1020 |
| Nominal ^a steam temperature ($^{\circ}F$) | 516.1 |
| Nominal ^a steam flow (lbs/sec) | 933/SG |

TABLE 1 (cont'd.)

| <u>Parameters</u> | <u>Value</u> |
|---|--------------|
| Nominal ^a SG secondary side fluid mass (lbs) | 78780/SG |
| Maximum steam moisture (%) | 0.25 |
| Nominal ^a feed enthalpy (Btu/lb) | 419.3 |
| Auxiliary Feed flow capacity (gpm) | 600 |
| Auxiliary feed purge volume (ft ³) | 317 |
| Auxiliary feed water available (gal) | 185,000 |
| Auxiliary feed enthalpy (Btu/lb) | 100 |

Note:

^aNominal refers to value at rated full power.



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TABLE 2

SEQUENCE OF EVENTS FOR LOSS OF FEEDWATER WITHOUT A REACTOR TRIP

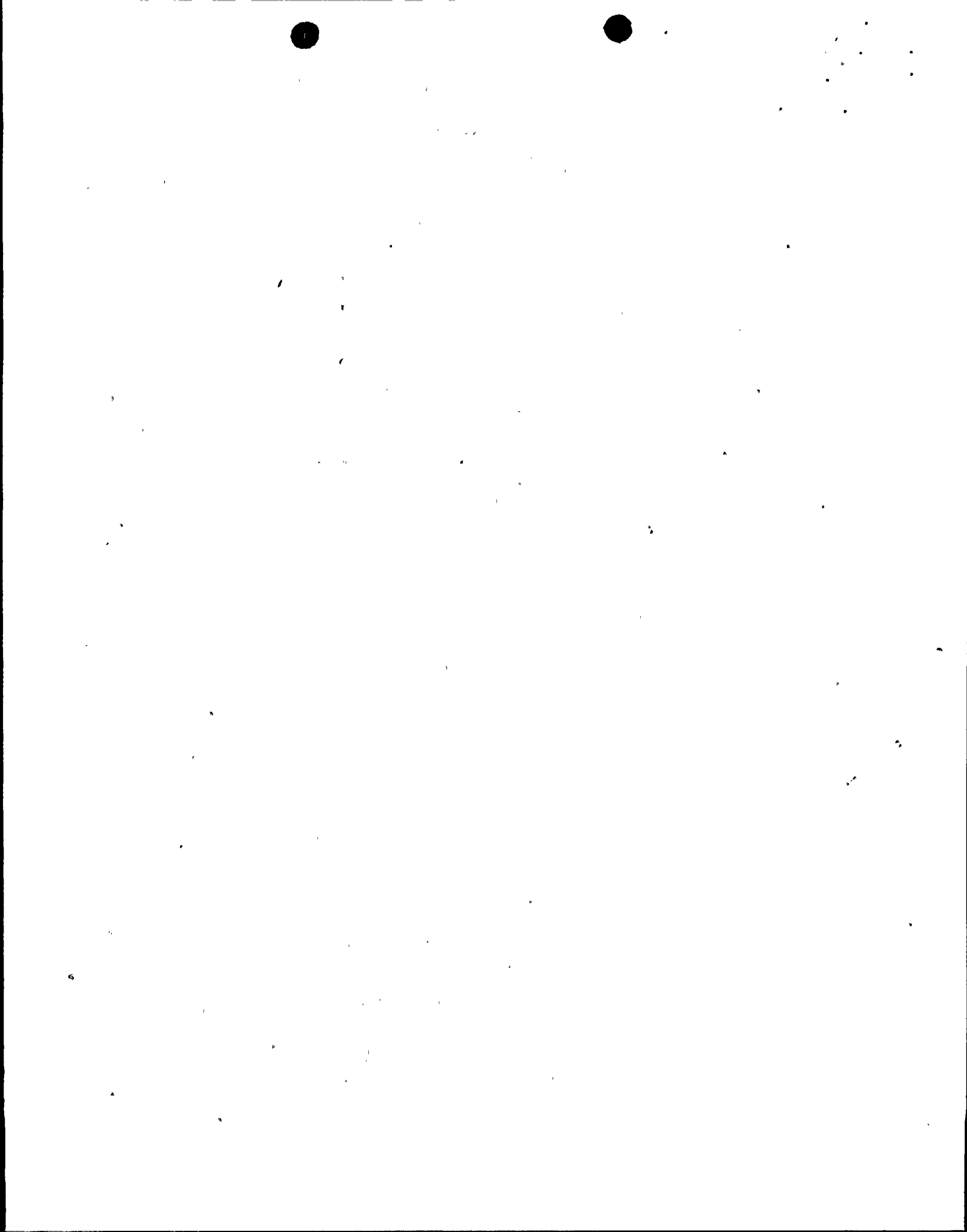
| <u>Event</u> | <u>Time (Sec)</u> |
|---|-------------------|
| Main Feedwater Supply to All Steam Generators is Terminated | 0-4 |
| Steam generator water level begins to fall | |
| Steam temperature and pressure begin to rise | |
| Reactor Coolant System temperature and pressure begin to increase | |
| Expanding reactor coolant surges into the pressurizer, causing level to rise | |
| Core power begins to drop | |
| Reactor/Turbine Trip Signal: Low Steam Generator Water Level and Steam/Feed Flow Mismatch | 7 |
| Reactor/Turbine Trip Signal: Low-Low Steam Generator Water Level | 11 |
| Turbine is Assumed to Trip | 30 |
| 40% steam dump to condensers | |
| Reactor coolant temperature rises more steeply | |
| Core Power declines more rapidly | |
| Power-Operated Relief Valves on the Pressurizer Open and Release Steam | 33 |
| Pressurizer pressure >2350 psia rises very rapidly | |
| Reactor/Turbine Trip Signal: Overtemperature Delta T | 41 |
| Steam Generator Safety Valves Open and Hold Steam Pressure Constant | 47 |
| Total steam flow rises rapidly above the 40% being dumped to the condenser | |
| Core power decline begins to slow, as more heat is removed by increased steam flow | |
| Pressurizer Pressure Reaches a Peak of 2367 psia | 43 |
| Pressurizer Relief Valves Close | 55 |
| Total Steam Flow From the Steam Generators Reaches a Peak of 88% of Nominal Flow | 66 |
| Reactor Coolant System and pressurizer pressure drops | |
| Core power decreases very slowly | |

TABLE 2 (cont'd.)

| <u>Event</u> | <u>Time (Sec)</u> |
|---|-------------------|
| Steam Generator Tubes are Effectively Uncovered and UA Begins to Decrease | 68 |
| Primary system pressure rises rapidly | |
| Steam flow and core power drops more rapidly | |
| Pressurizer Relief Valves Open | 70 |
| Pressurizer pressure levels off at 2350 psia, as relief valves release steam | |
| Reactor/Turbine Trip Signal: High Pressurizer Water Volume | 72.5 |
| Rapid Rise in Pressurizer Pressure - Relief Valves Cannot Release Steam Fast Enough to Hold Pressure at 2350 | 73 |
| Reactor/Turbine Trip Signal: High Pressure | 80.4 |
| Pressurizer Safety Valves Open | 82 |
| Pressurizer Fills With Water | 80 |
| No steam space remains in the pressurizer | |
| Relief valves release water | |
| Pressurizer pressure continues to rise rapidly | |
| Steam Generator Safety Valves Close | 81 |
| Total steam flow consists of steam dump to condenser | |
| Peak Reactor Coolant System Pressure is Reached (2911 psia) | 113 |
| Peak Pressurizer Pressure is Reached (2875 psia) | 113 |
| Reactor/Turbine Trip Overpower Delta T Trip | 114 |
| Pump is Assumed to Cavitate (Cold Leg Temperature is $\leq 6^{\circ}\text{F}$ Below Saturation Temperature) | 135 |
| Reactor/Turbine Trip Signal: Low Reactor Coolant Flow | 137 |

TABLE 2 (cont'd.)

| <u>Event</u> | <u>Time (Sec)</u> |
|---|-------------------|
| All Auxiliary Feedwater Pumps are Assumed to Start Purging of the main feedwater lines begins; main feedwater remaining in the lines is pushed into the steam generators by the auxiliary feedwater (3% of nominal feedwater flow) Steam flow slowly decreases Core power slowly decreases Primary system pressure drops | 180 |
| Steam Space Forms in Pressurizer, as Water Level Begins to Drop All pressurizer valves are closed Purging of the main feedwater lines by auxiliary feed- water is completed - colder (auxiliary feedwater) water 100 BTU/lb enters the steam generators and heat transfer in the steam generator increases slightly | 250-260 |
| Core power at 3% of nominal, flow at 3% Primary system pressure is 2192 psia | 600 |



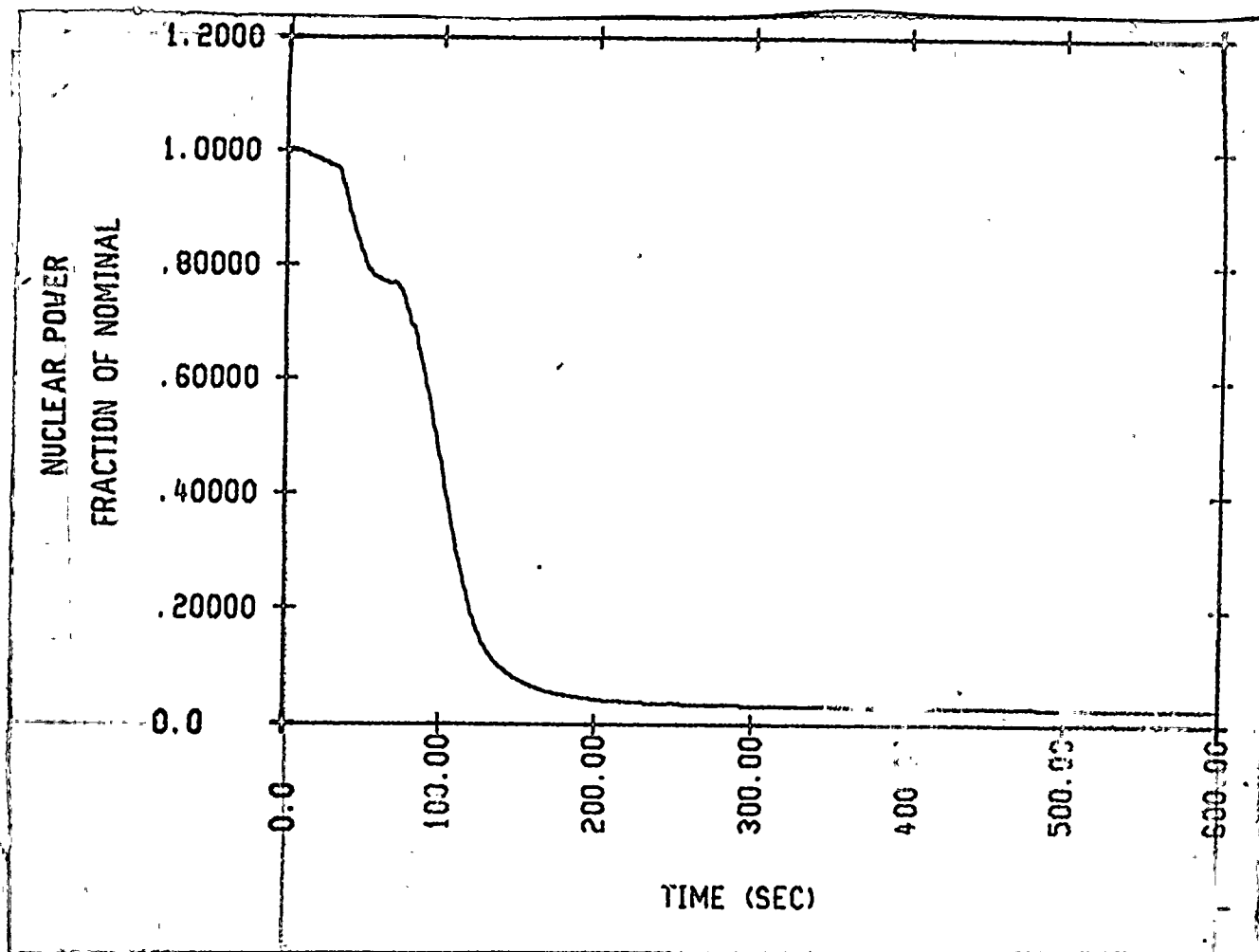


Figure 1 Nuclear Power Versus Time

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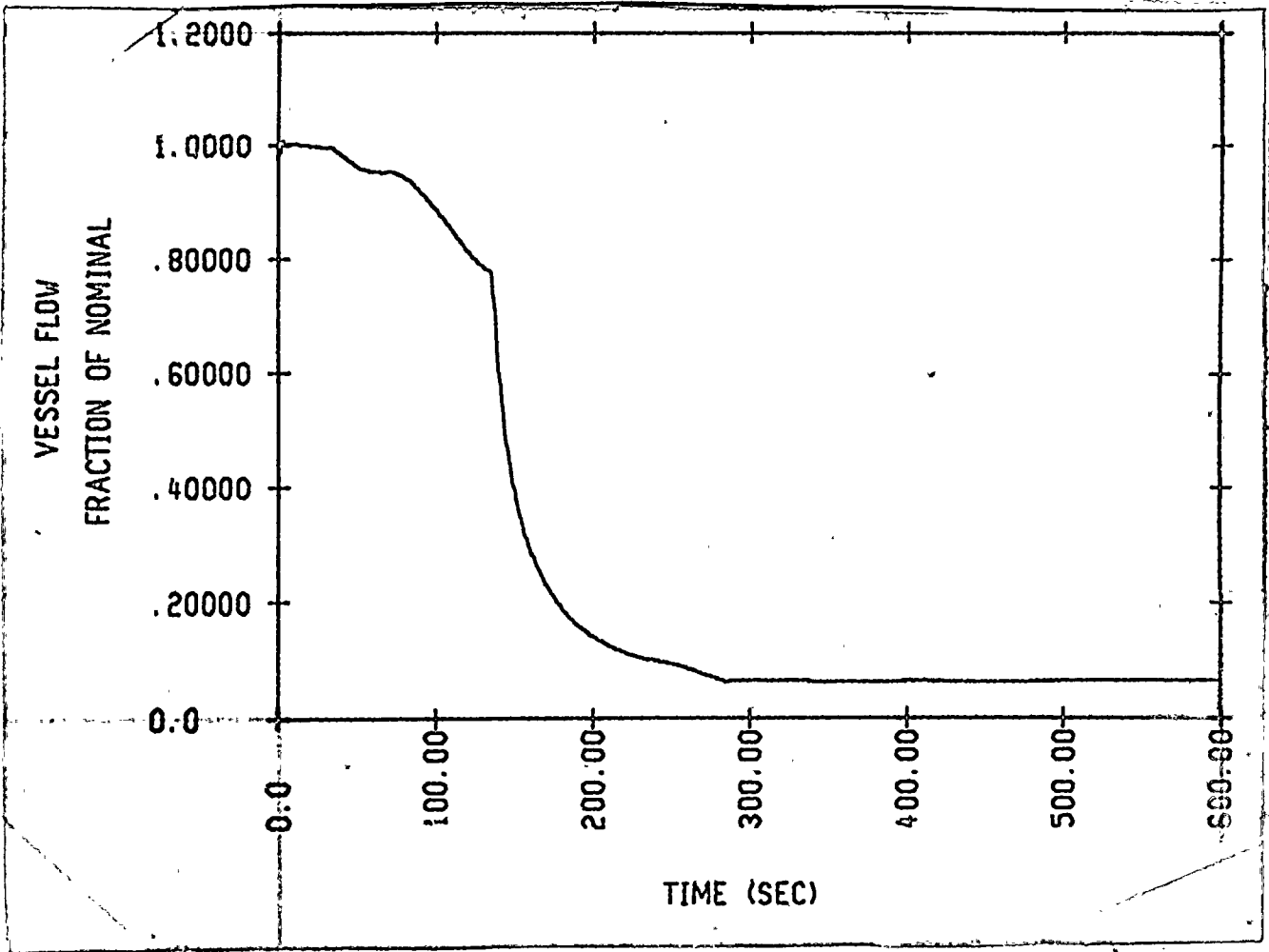


Figure 2 Vessel Flow Versus Time

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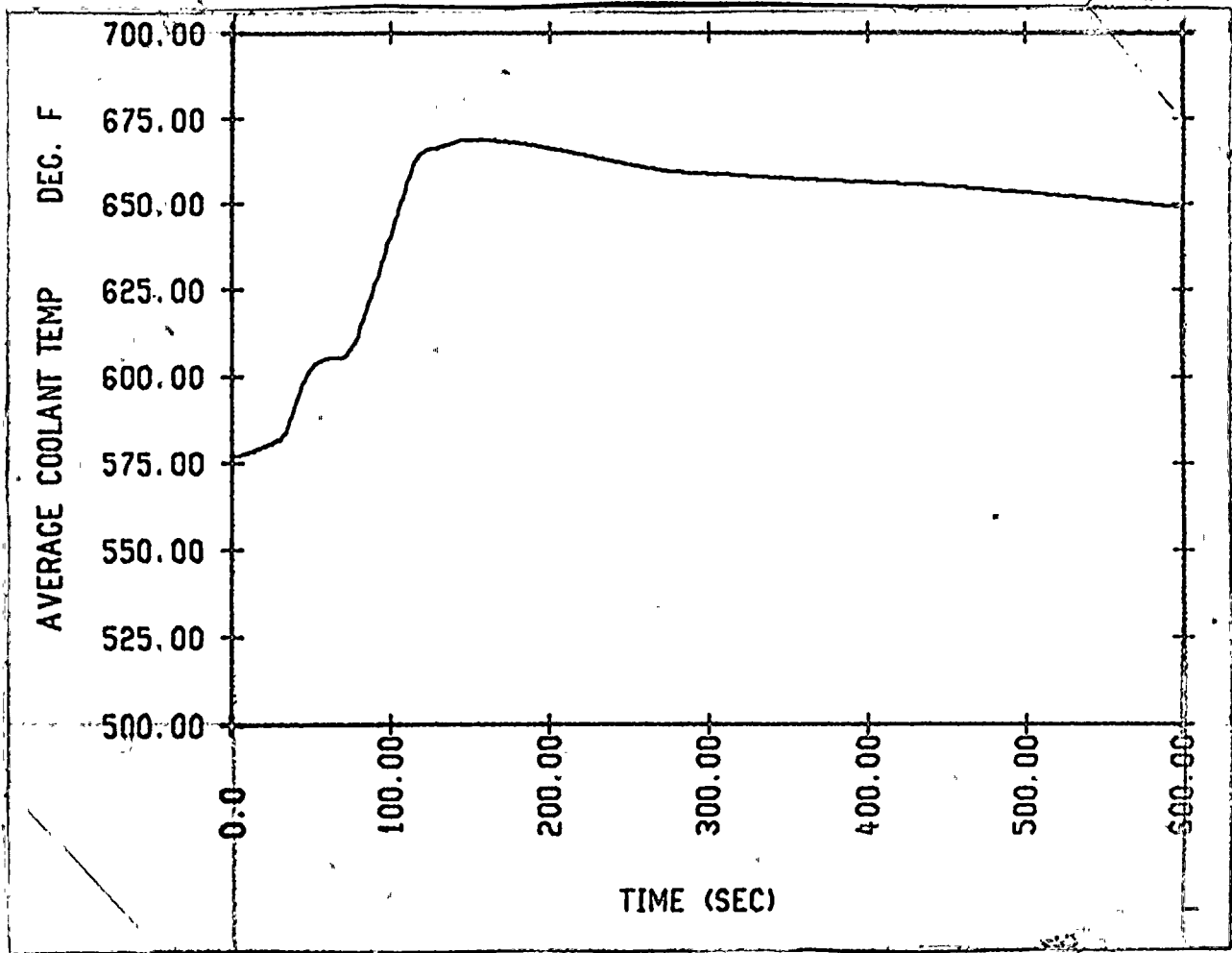
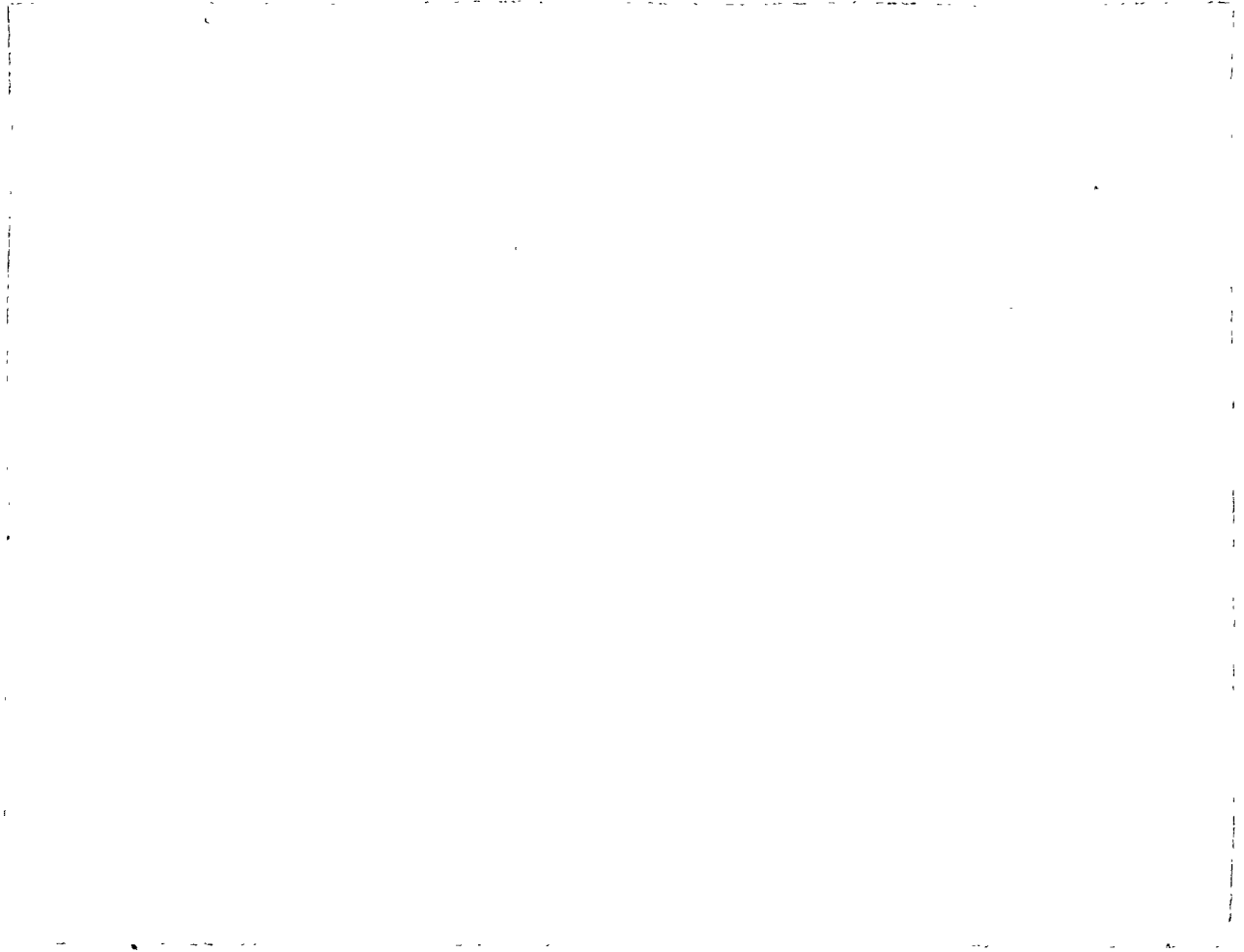


Figure 3 Average Temperature Versus Time



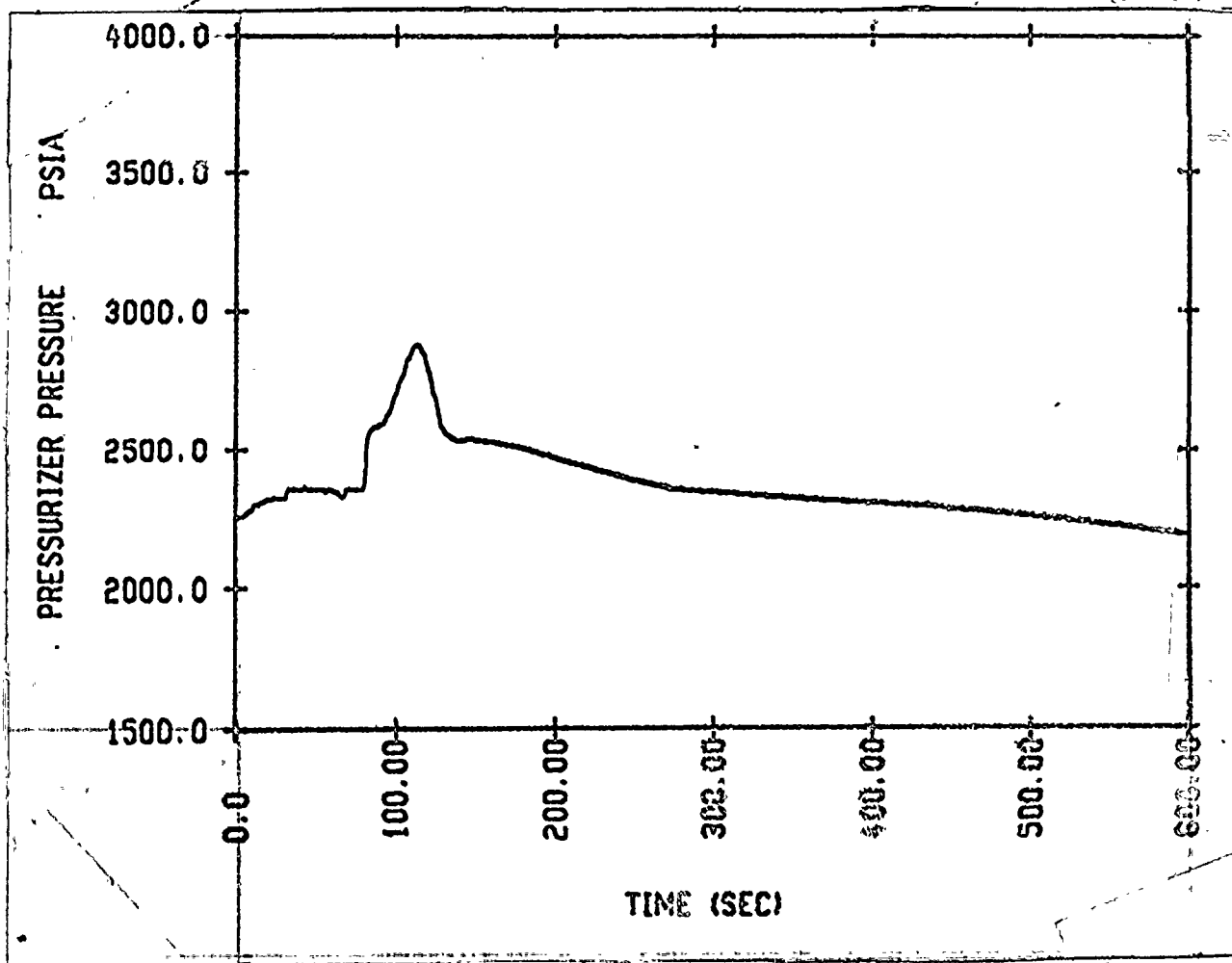


Figure 4 Pressurizer Pressure Versus Time

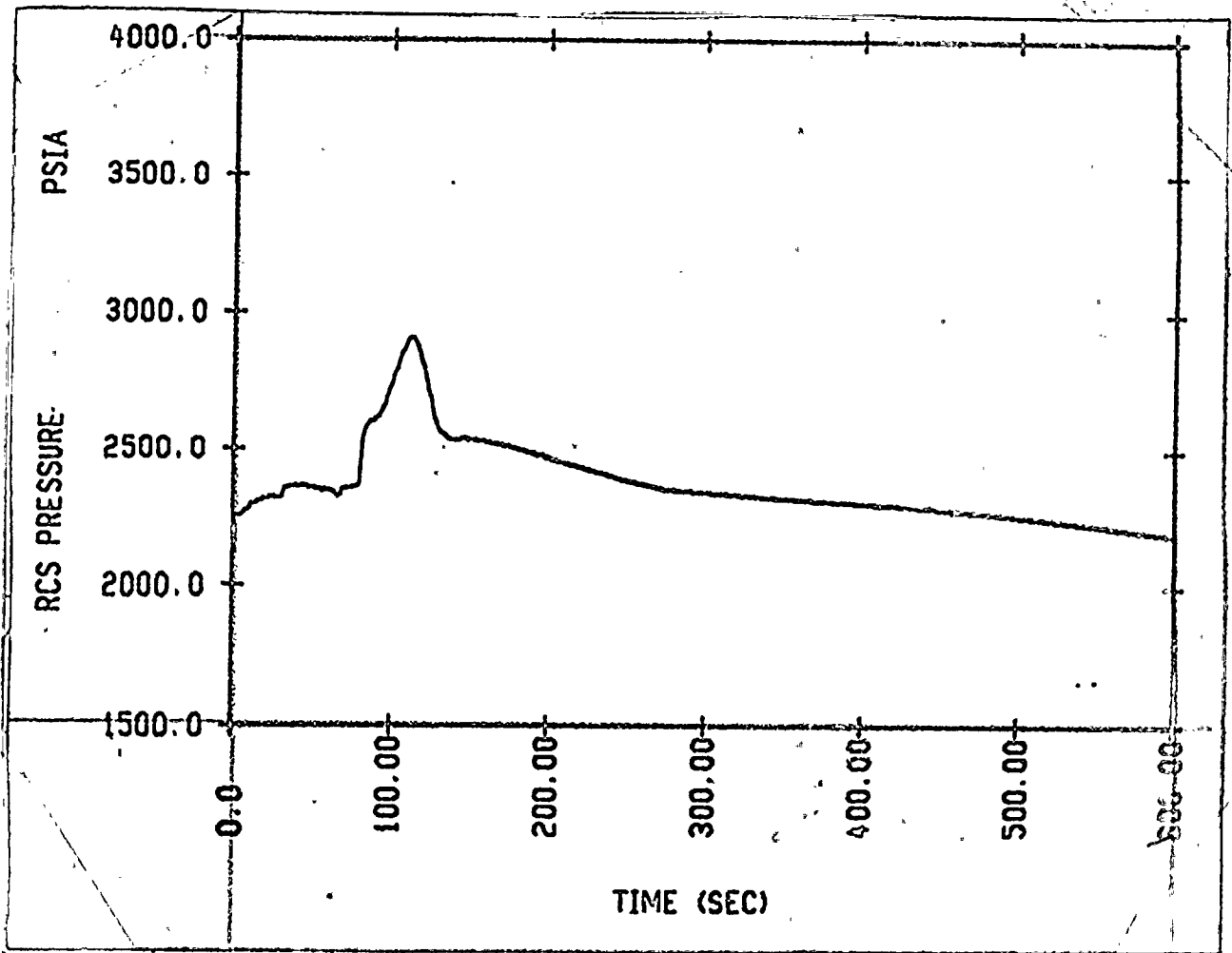


Figure 5 RCS Pressure Versus Time

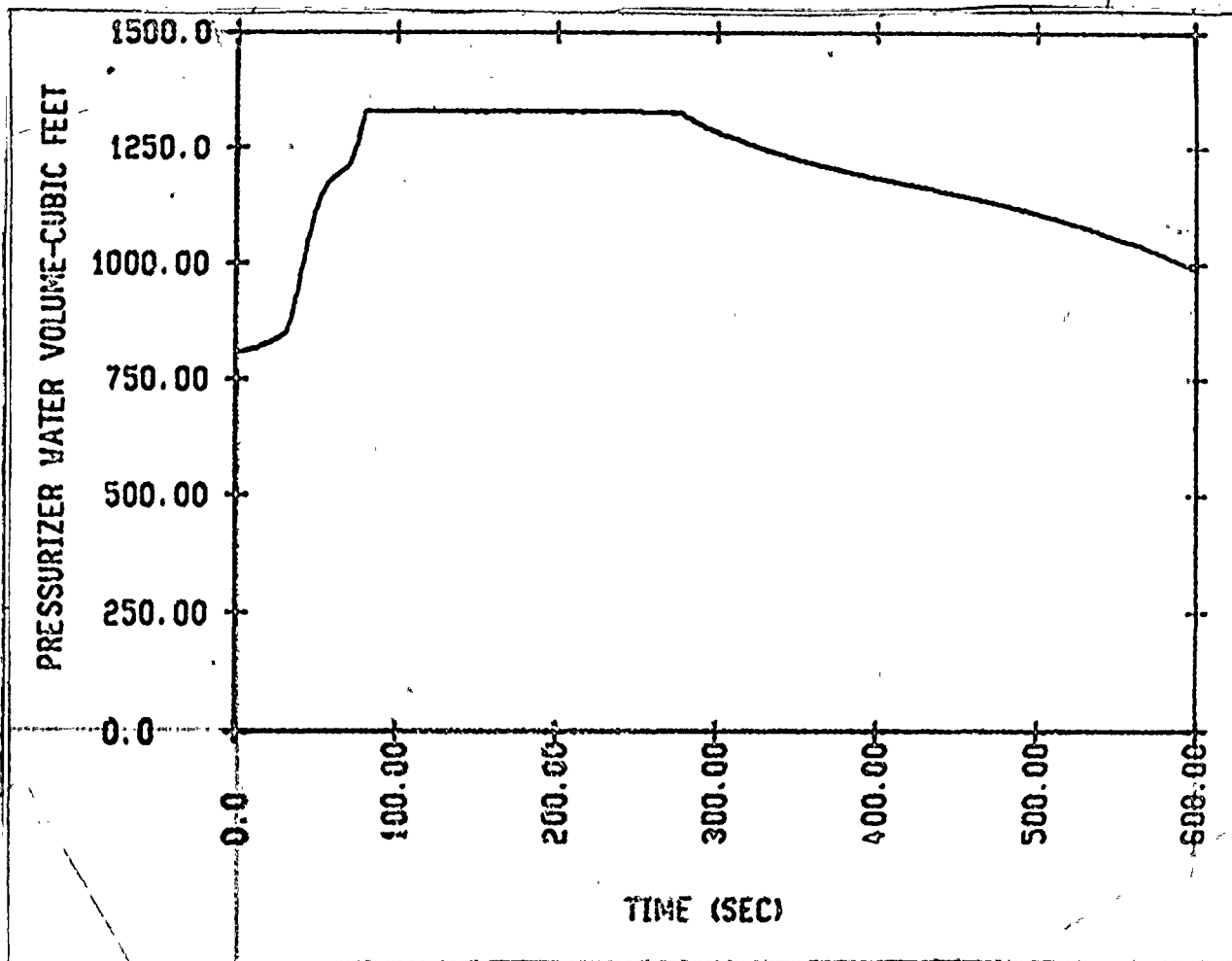


Figure 6. Pressurizer Water Volume Versus Time



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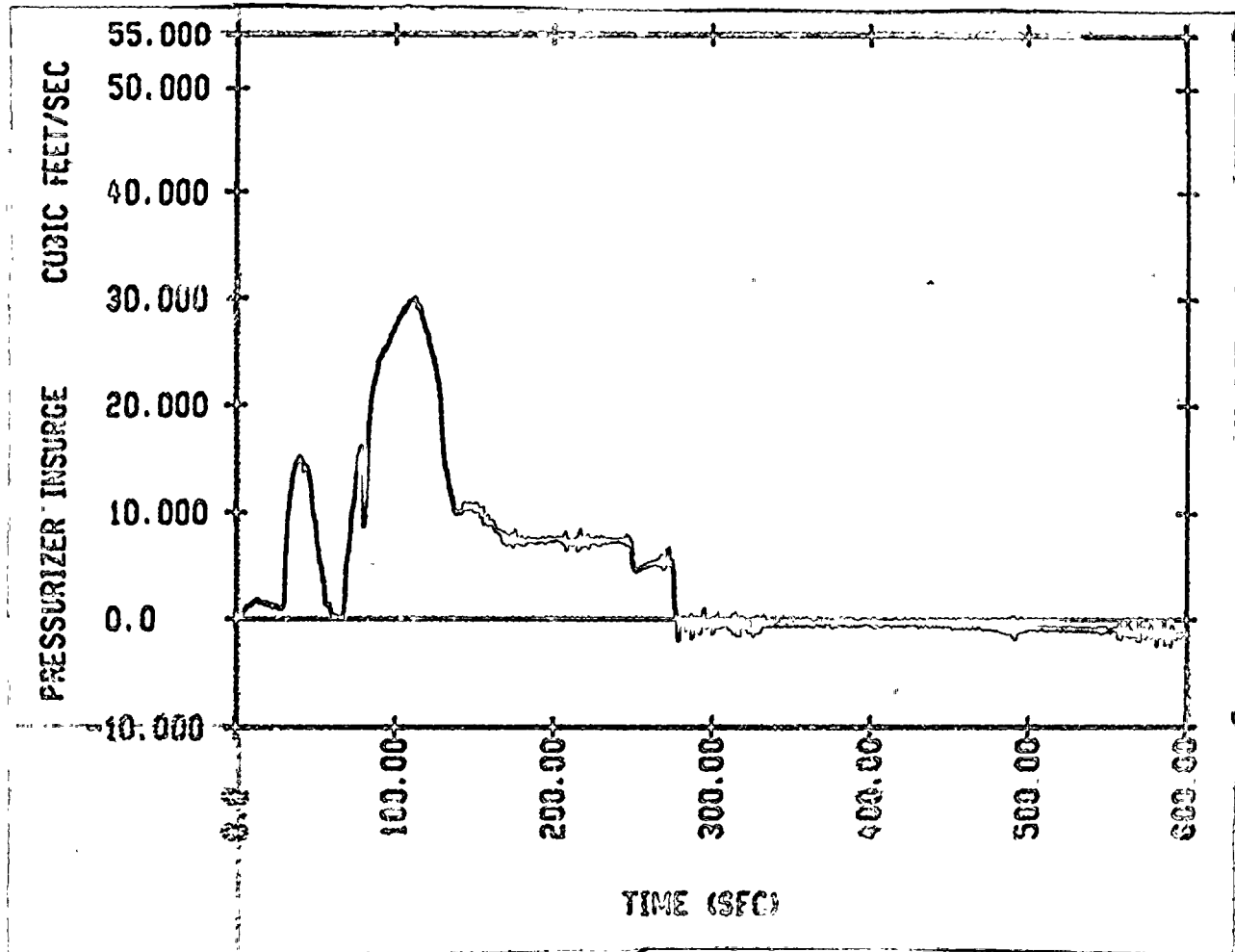
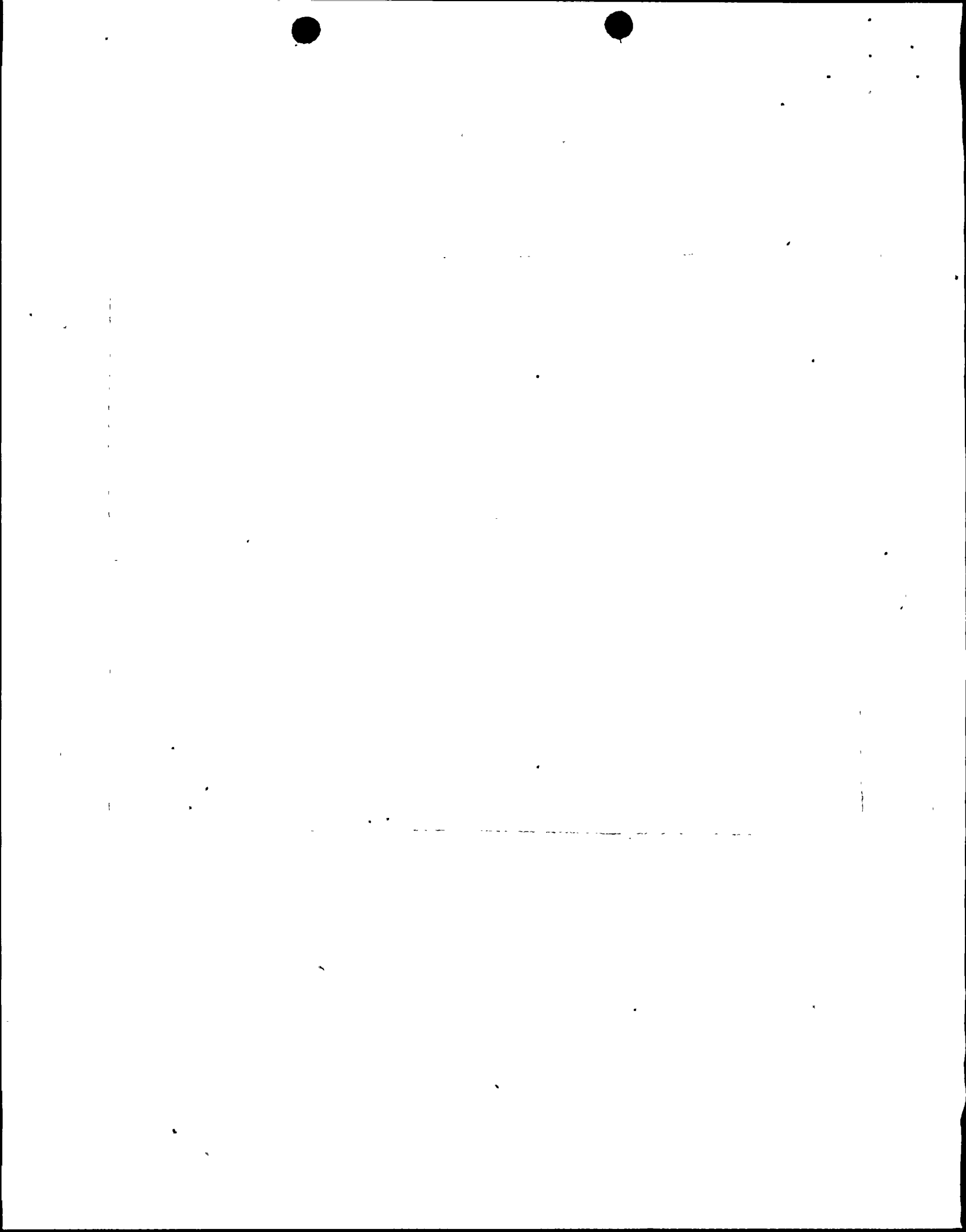


Figure 7 Pressurizer Insurge Versus Time



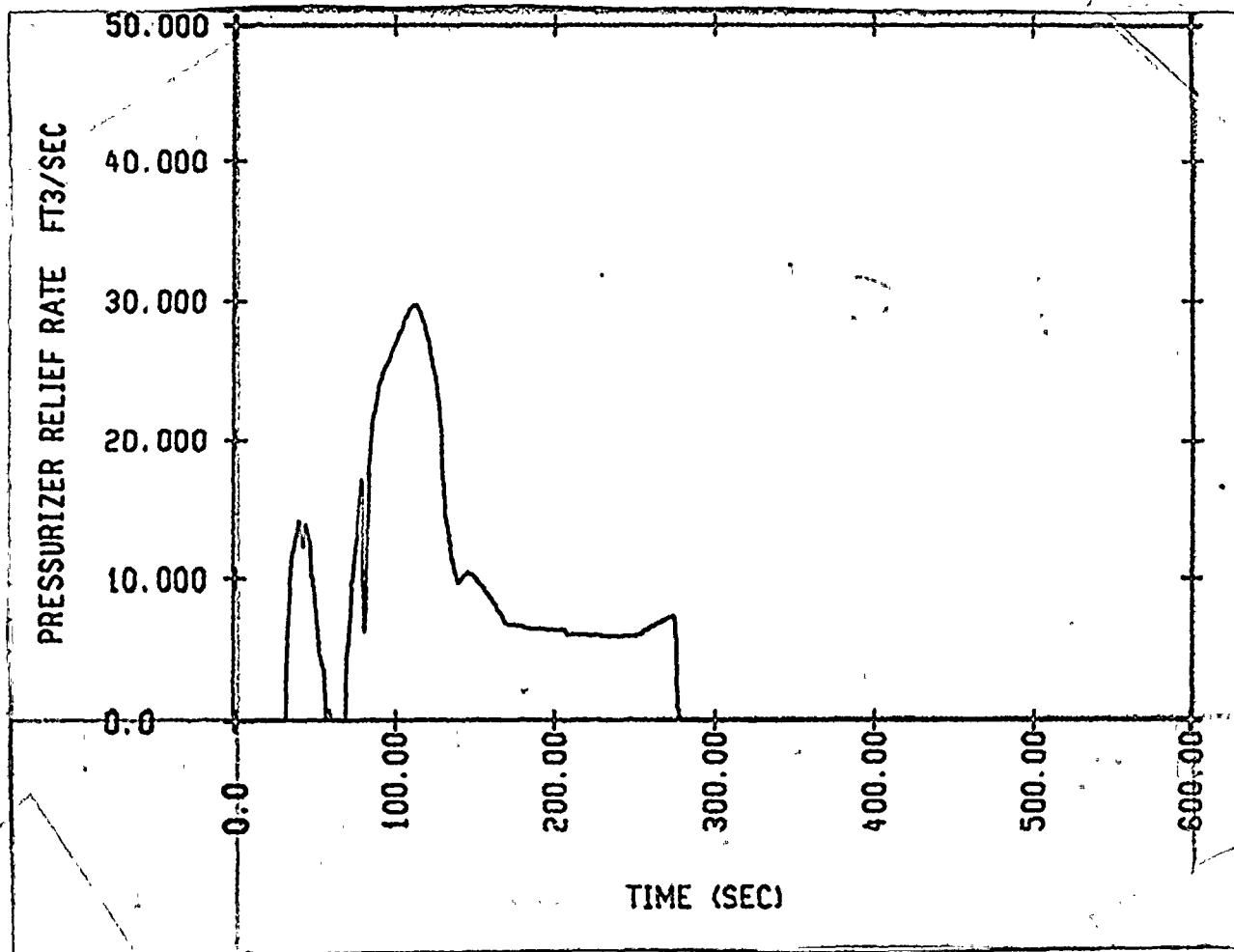
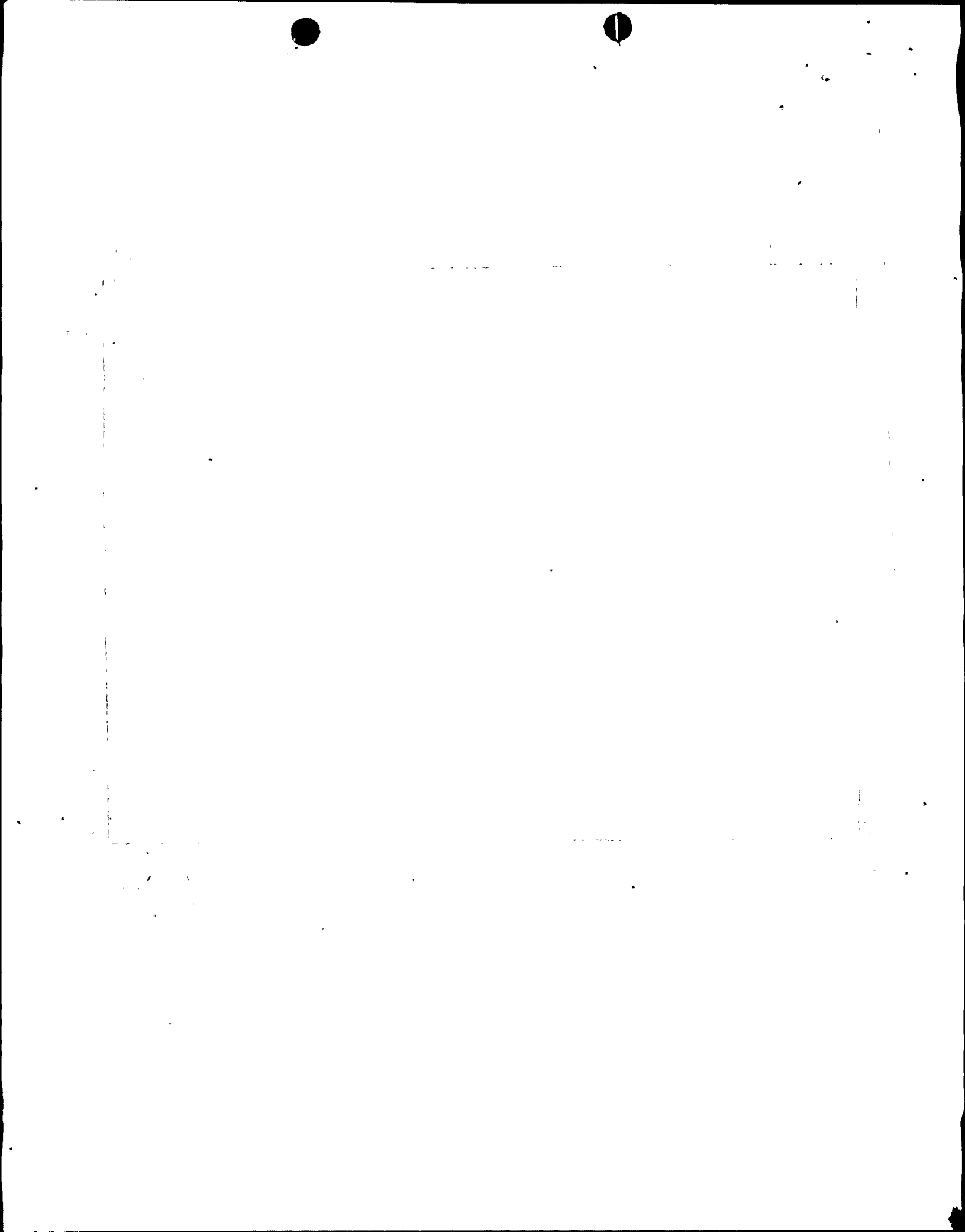


Figure 8 Pressurizer Relief Rate Versus Time



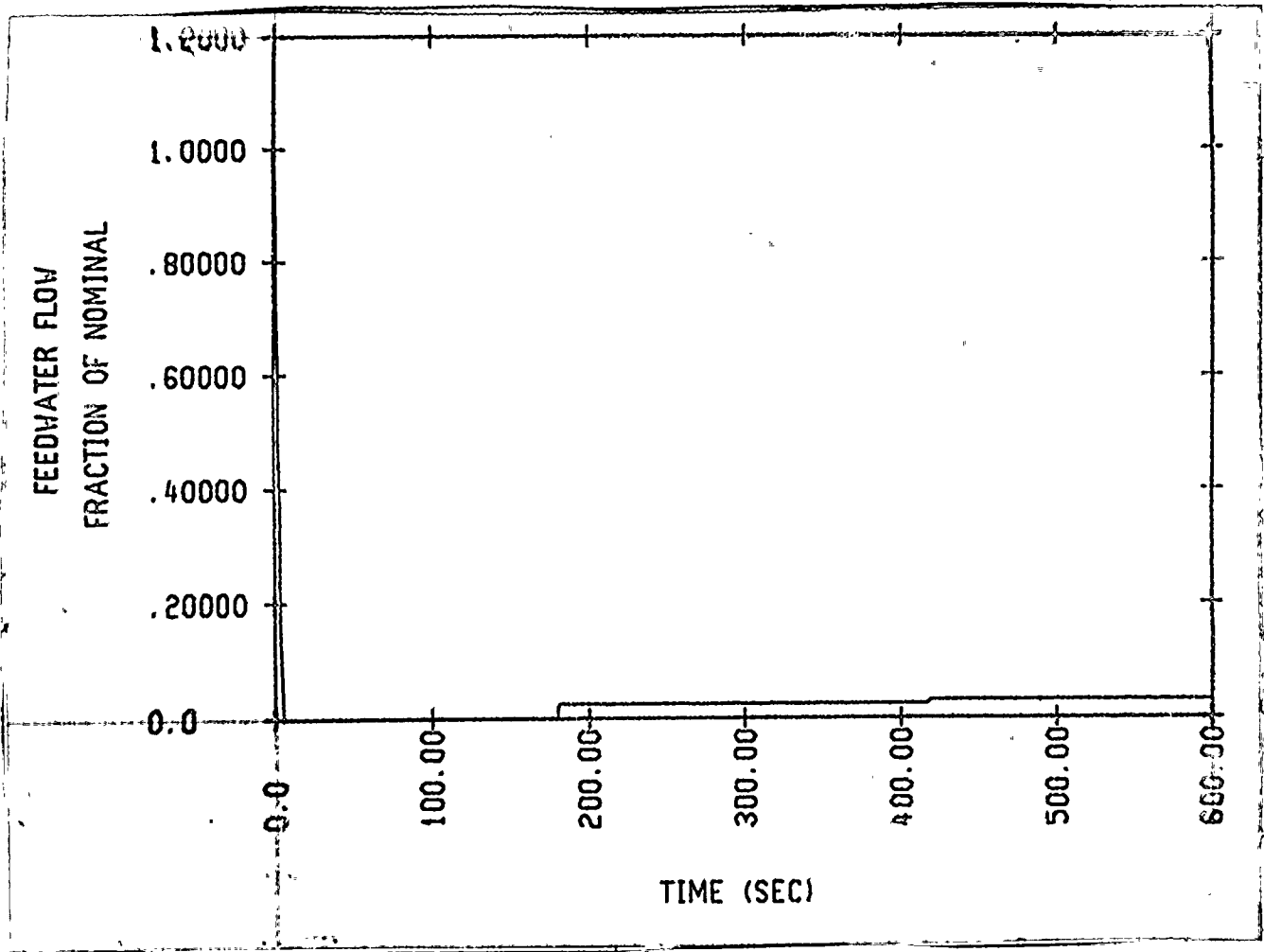
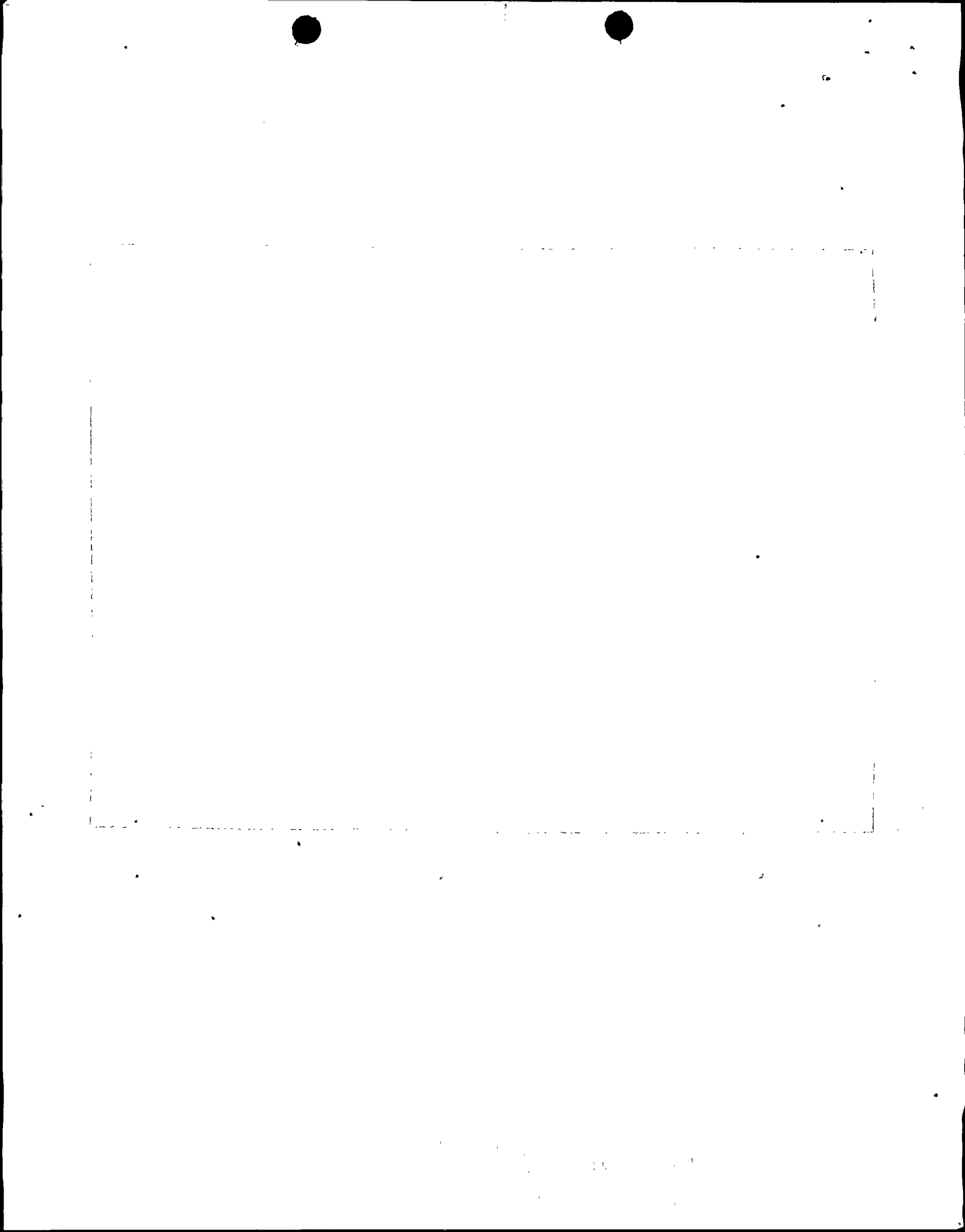


Figure 9 Feedwater Flow Versus Time



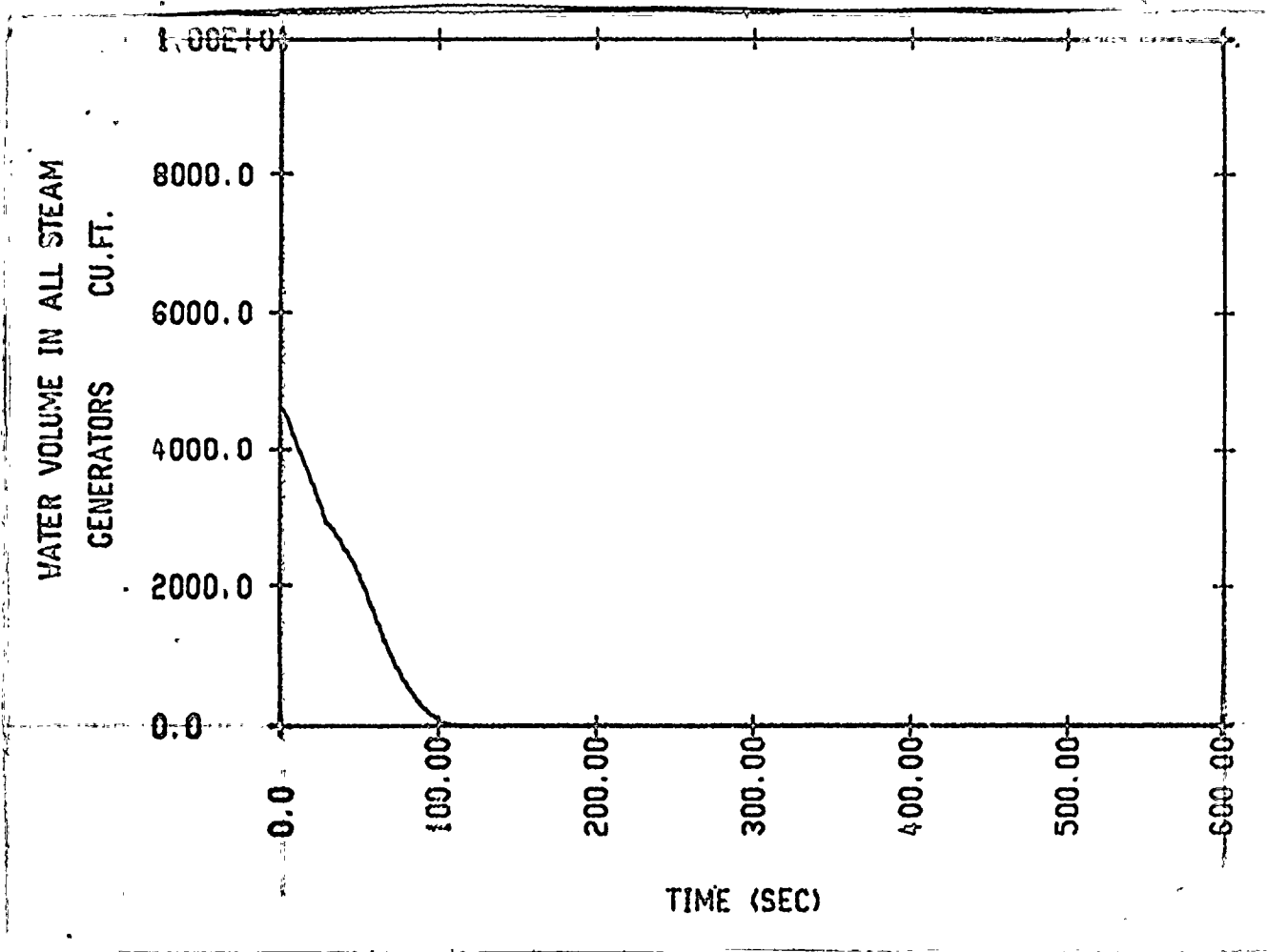
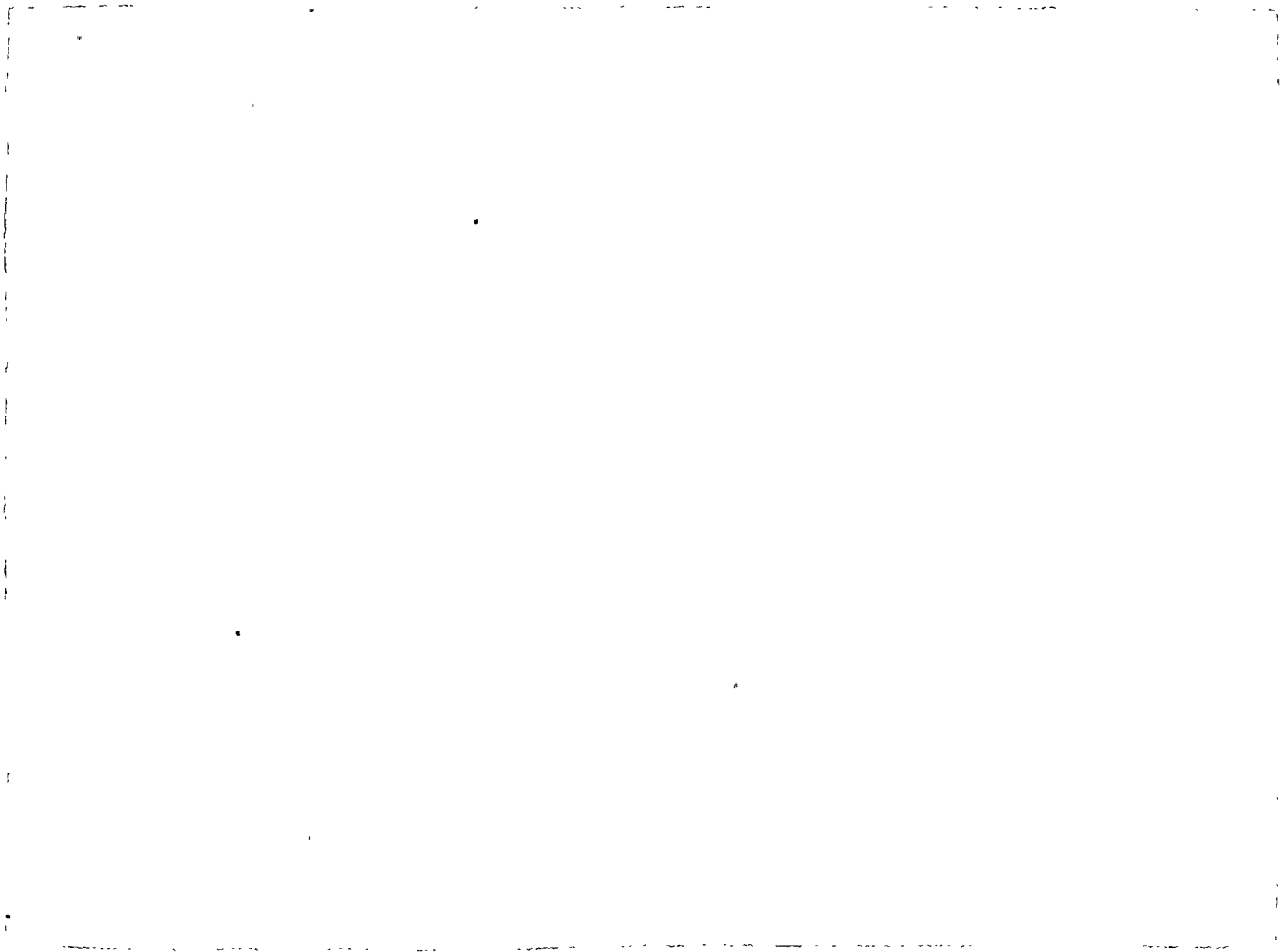


Figure 10 Water Volume in all Steam Generators Versus Time



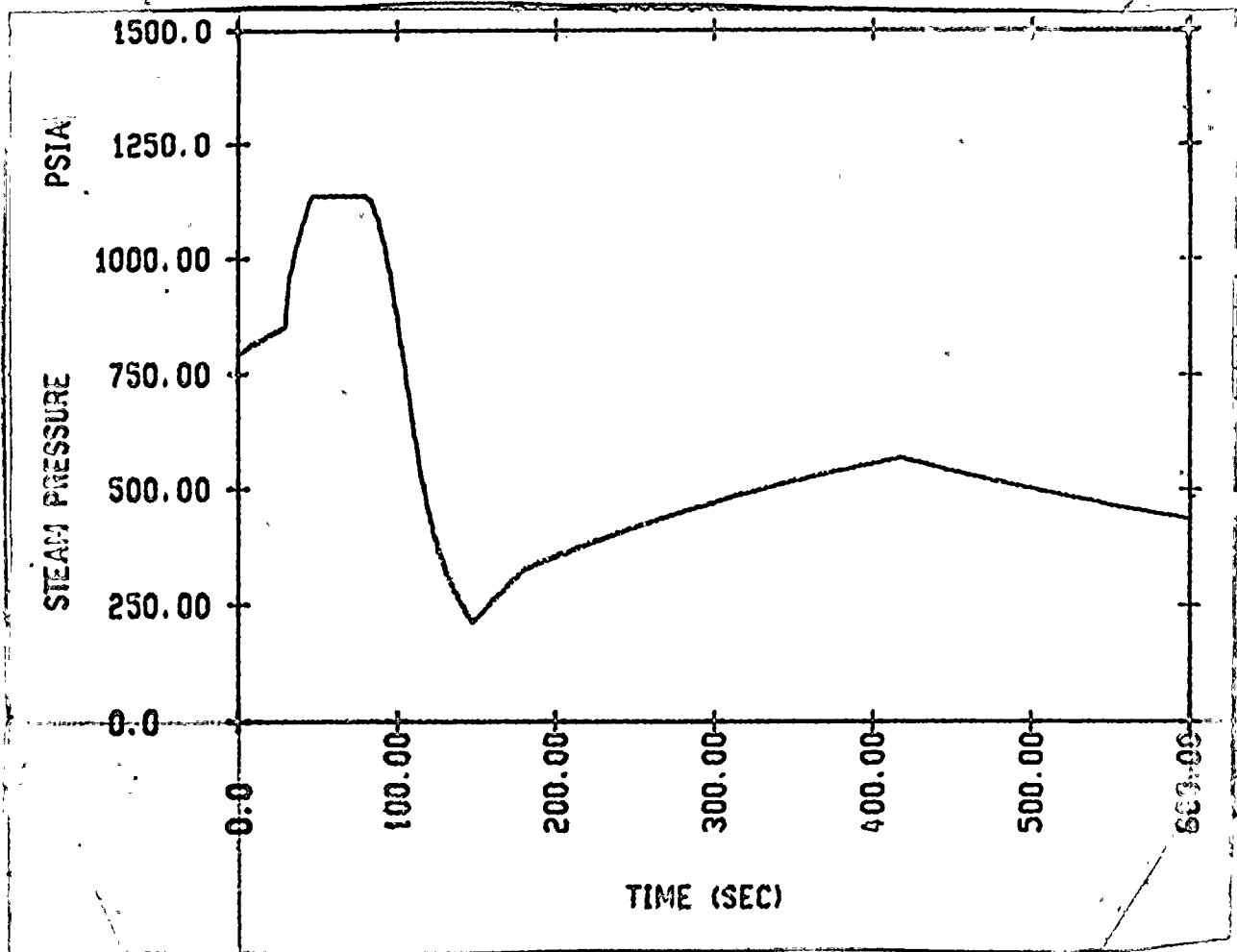
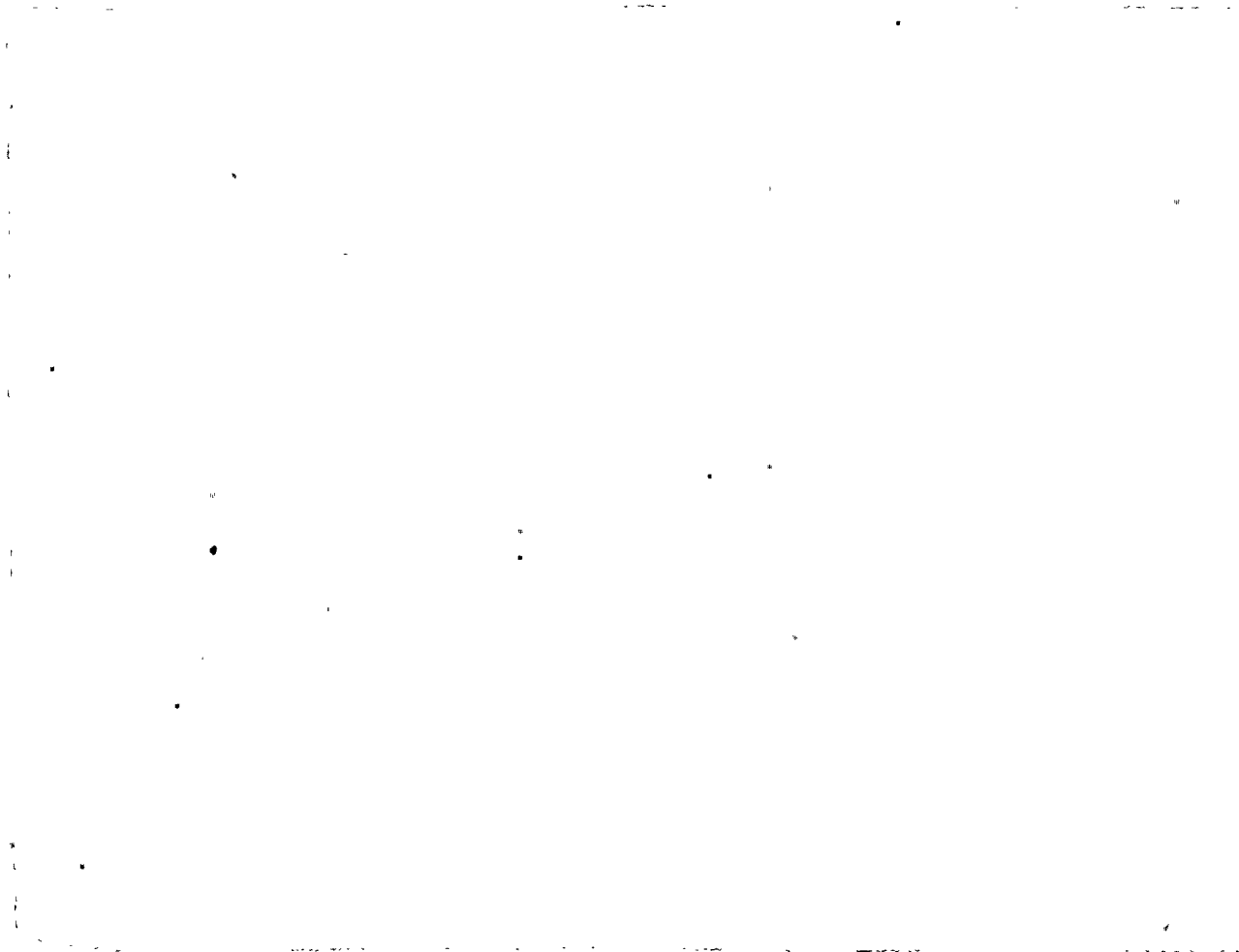


Figure 11 Steam Pressure Versus Time



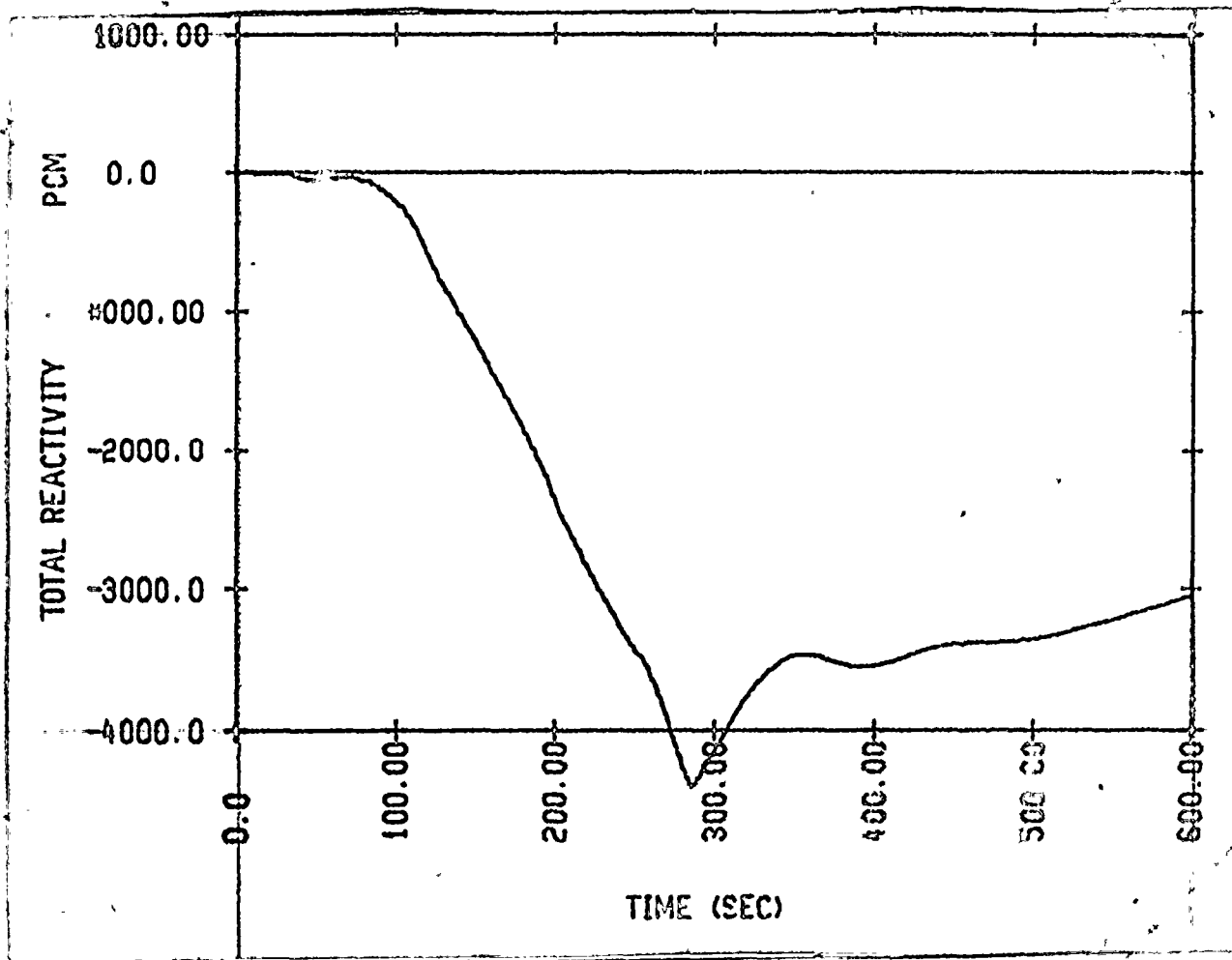


Figure 12 Total Reactivity Versus Time

