## NUCLEAR REGULATORY COMMISSION

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In the Matter of: ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

METAL COMPONENTS WORKING GROUP

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1	NUCLEAR REGULATORY COMMISSION	
2	ADVISORY COMMITTEE ON REACTOR SAFEGUARDS	
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4	METAL COMPONENTS WORKING GROUP	
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6	Room 1167	
7	1717 H Street, N.W.	
8	Washington, D.C.	
9	September 30, 1982	
10	The Working Group met, pursuant to notice, at	
11	8:30 a.m., MIKE BENDER (Chairman of the Working Group)	
12	presiding.	
13	PRESENT:	
14	ACRS MEMBERS:	
15	M. BENDER (Chairman)	
16	P. SHEWMON	
17	D. WARD	
18	F. REMICK	
19	CONSULTANTS:	
20	I. CATTON	
21	Z. ZUDANS	
22	MR. ABBOTT	
23	MR. BINFORD	
24	MR. KOUIS	
25	MR. THEOFANOUS	

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1	CONSULTANT	TS (Continued):
2		MR. WECHSLER
3		MR. IRWIN
4	ALSO	PRESENT:
5		BILL BOCK, ACRS Fellow
6	DESIG	NATED FEDERAL EMPLOYEE:
7		AL IGNE
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## PROCEEDINGS

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(8:30 a.m.)

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3 MR. BENDER: This meeting will now come to 4 order. This is an open meeting of the Metal Components 5 Working Group of the Advisory Committee on Reactor 6 Safeguards. I am Mike Bender, the subcommittee working 7 group chairman. The other ACRS members present here on 8 my left are Dr. Axtmann, Dr. Shewmon, Mr. Ward, Mr. 9 Remick. In addition, we have a number of consultants 10 for the working group. Going around the table, Mr. 11 Catton, Mr. Abbott who is h. here, Mr. Binford, Mr. 12 Kouts, Mr. Theofanous, Mr. Wechsler, Mr. Zudans, Mr. 13 Irwin. In addition, there is Bill Bock, our ACRS fellow 14 who has been working actively with the group, and on my 15 right is Al Igne, who is the designated representative 16 for the NRC.

17 The purpose of this meeting is to hear and 18 discuss with the NRC staff their pressurized thermal 19 shock position. The views of others will also be 20 heard. This meeting is being conducted in accordance 21 with the provisions of the Federal Advisory Committee 22 Act and the government and the Sunshine Act. The rules 23 for participation in today's meeting have been announced 24 as part of the notice of this meeting previously 25 published in the Federal Register on September 13, 1982.

A transcript of the meeting is being kept, and it is requested that each speaker first identify himself or herself and speak with sufficient clarity and volume so that he or she can be readily heard. We have not received either written or requests for oral statements during this meeting, so no time has been set aside. However, if there is anyone who wishes to make comments, if you will let Mr. Igne know what it is you would like to make a comment about and we can work out some arrangements and provide some time, we will certainly do it so.

I wanted to add a few thoughts about our Is situation at the moment, partially to get the working If group up to speed and partially to help the staff in its Is organization and presentation this morning.

We have received what I would presume to be 17 near to a position from the regulatory staff on a 18 screening procedure for deciding when thermal shock is a 19 problem that needs special regulatory attention. I 20 don't know whether that means regulatory action. And 21 hopefully, all of the consultants and members of the 22 subcommittee have had a chance to take a look at what 23 has been proposed and we will be able to make 24 intelligent comments on the presentation or what's in 25 the written material as it is presented.

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Steve Hanauer has offered to try to provide a coherent discussion of it, and we have set aside a couple of hours for his presentation. And hopefully, he will tolerate some questions, but if we work on it too hard we may not hear the whole story, so I would like to encourage you to address your questions to him in the line of trying to be sure you understand what he is saying rather than trying to digress into areas that may need to be taken up later on today.

I have sent out for the working group's In consideration what amounts to a draft discussion of the issue as I understood it, with corrections for various members of the working group and particularly consultants who have suggested things that should be is included or alterations in the way words should be said.

I don't offer that discussion as either a I don't offer that discussion as either a Nighly professional technical document nor a literary Namasterpiece. It was only intended to try to get 19 together as well as I could in the a short time the 20 information that had been presented, and offer some kind 21 of interpretation.

I would again urge people that have strong feelings about improving it to provide alternative discussion material that could be included in the focument or added as an appendix. Any way which makes

1 any sense.

A lot of the work was done by Bill Bock, and I appreciate his diligent effort to respond to a lot of recommendations from a lot of different people. The working group has not yet reached the position on what probably are the important questions we asked, and I think I would like to run down through those that I can think of today and see if they represent a reasonable list of things which ultimately ought to provide some kind of -- we ultimately ought to provide some kind of position on. 6

12 The first is whether the staff's screening 13 criteria, as it is presented, is acceptable. The 14 criteria for judging those screening criteria probably 15 are: Do they provide alequate time to do something 16 about the issue, if it is important to do something 17 about it. Whether they are exactly the right screening 18 criteria clearly is an important part of that issue. 19 And so it should be kept in mind when you're listening 20 to the staff presentation.

21 The second point that I believe we ought to 22 make sure we have a position on is the question of what 23 the licensees and applicants should be doing about 24 pressurized thermal shock. And the things that come to 25 mind are the question of whether the training program is

1 adequate, whether the non-destructive examination
2 program is a useful one and can be effective; whether we
3 know about the materials' properties and materials in
4 question to be able to make a judgment about them;
5 whether we understand the neutron damage question well
6 enough to be able to relate it to the materials'
7 properties; do we understand the transients that are of
8 concern, and have we identified those that represent the
9 important issues, and do we accept the operational
10 strategy which goes with the safety judgments.

By operational strategy, I mean the 2 capabilities of the operators in terms of being able to 3 diagnose the accident. Their ability to respond in a 4 timely way; if they have diagnosed the accident 5 properly, and whether we accept the circumstances which 16 require them to think not only about when they need to 17 be pressurized, but also, when they need to keep the 18 system pressurized. And the fact that that is a 19 somewhat contradictory kind of operating requirement is 20 something we need to give some thought to.

In addition, we need to think more, I believe, 22 about the matter of whether there is enough time 23 involved in this program which the NRC staff is 24 presenting to the Commissioners to get the results which 25 are needed to have a position on the safety of these

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1 vessels. We may not have heard enough about what's 2 going on to make that judgment, but if it is necessary 3 to do further research and development work we ought to 4 have some understanding about whether they can 5 accomplish what they claim they are going to accomplish. 6 within the specified time.

7 And lastly, I suggest we think a little bit 8 about whether the systems that are licensed and 9 operating have enough diagnostic instrumentation to be 10 able to judge the seriousness of a problem from the 11 indications which have been available to the operators. 12 And if there is not enough diagnostic instrumentation, 13 then it may be appropriate to suggest what needs to be. 14 done to provide for additional instrumentation.

15 The last point I would like to make has to do 16 really with whether the story which is being presented 17 is really understaniable by anybody except the 18 technicians that developed the story. And one of the 19 things that was suggested was to try to use Pellini's 20 fracture analysis approach as a more understandable way 21 of presenting the story to people who were not steeped 22 in technological issues.

I think some comments on that approach, and 24 Combustion Engineering people offered it as their way of 25 telling the story. Whether it's a good one or not I

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1 don't know. Dr. Zudans has some commentary on it. You
2 might want to think some about whether that is an
3 approach that is more understandable than one we are
4 likely to hear today. I don't put it out as necessarily
5 the best way to present the story.

6 That is essentially all of the thoughts I have 7 on the subject matter. I would like now to ask the 8 working group members and the ACRS members, including 9 Dr. Remick who has just joined our sterling cast, and 10 Mr. Ward who has showed up occasionally --

11 (Laughter.)

16

12 -- whether they have any additional thoughts on this
13 subject. Why don't we just start around the table?
14 MR. AXTMANN: I will wait until the end of the
15 day.

MR. SHEWMON: I have nothing now.

17 MR. REMICK: Not now, thank you.

18 MR. KOUTS: I think we might ask what should 19 -- you say what should the licensees and applicants do 20 in light of the problem and what we know about it and 21 what we don't know about it. And I wonder if we 22 shouldn't add: what should the NRC do.

23 MR. BENDER: Well, that is certainly an24 important point, indeed. Thank you.

25 If there is nothing else, I think the order in

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which we have planned this agenda was to turn the
 meeting over to the NRC staff for what amounts to about
 three hours. So, Dr. Hanauer has the stage.

4 MR. HANAUER: Thank you, Mr. Chairman. A year 5 ago, we told the ACRS and the Cormission that there was 6 no immediate need for changes or shutdowns of plants, 7 and asked for a year in which to address this problem. 8 And for the past year, we and the industry have been 9 involved in an intensive, multi-disciplinary study of 10 the pressurized thermal shock problem, whose initial 11 culmination is the report, a draft of which you received 12 a month or so ago.

13 The report which you received was the draft 14 which we sent to our colleagues in the NRC, and both our 15 colleagues and their comments and questions on our own 16 continuing study have produced a large number of 17 important but non-essential changes in this report, for 18 which a new edition is due on my boss's desk in a day or 19 two.

20 So that what you have represents a lot of 21 thought and has been discussed with a lot of people but 22 is not the NRC staff's management's position on 23 pressurized thermal shock. We agreed with your 24 subcommittee and the staff to have a dialogue at this 25 stage in order to discuss at some length and with some

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1 freedom the various technical issues involved, of which 2 there are a large number, so that what you see is Steve 3 Hanauer and a bunch of his colleagues' proposal to Mr. 4 Denton, to Mr. Stello, for discussion by peers, by the 5 public, by the ACRS. And eventually, will result in 6 some recommendation to the Commission.

7 The exact context of this is still being 8 discussed by lawyers and so on. Whether it will result 9 in rulemaking or some other piece of legal paper is not 10 yet decided and will be decided, I suspect, by a group 11 of people. No single one of them is in this room at the 12 present time.

13 So that what I would like to present you with 14 is a technical discussion of this difficult and 15 disorderly problem. Our first analysis which you heard 16 a year or so ago was an attempt at generic review of the 17 pressurized thermal shock problem, based on what we knew 18 a little over a year ago.

And what we did then was to pick the eight And what we did then was to pick the eight plants which seemed to be, at that time, based upon what we knew, the lead plants for each of the three manufacturers of nuclear steam supply designs, and we asked them in a period of some few months to analyze the pressurized thermal shock problem, the transients, the seel properties, the integration of these two into

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1 some kind of analysis and to make us recommendations
2 regarding where they viewed the safety of the plant and
3 the justification for the continued operation.

These plants have, in fact, -- the owners of these plants have, in fact, done this, and we have eight reports. In every case, the plant owners at least started, and most of them finished, with a traditional safety analysis approach to this problem. They selected a few relatively severe pressurized thermal shock sequences. They calculated the response of the plants to these sequences in some detail, using the kinds of evaluation models that we traditionally use around here, and concluded that the plants were okay today but that a few years some of these plants might not be okay.

Not surprisingly, some of the technical Not surprisingly, some of the technical Material which we received in the course of this disagreed with each other, partly because some of the Reporting was generic and some of the reporting was plant-specific. And this was perhaps our first serious linsight as a result of this process, which is that eneric analysis will get you just so far and in order to decide the risk or the situation or the necessary remedies for any given plant, a plant-specific analysis required.

And whereas a year ago we were looking for a

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1 fairly simple prescription that would establish whether 2 a plant had to shut down or anneal its vessel, or 3 whether continued operation was allowed, one of the 4 results of this past year's study is that no such simple 5 prescription has, in fact, emerged. And that what we 6 are proposing instead is a simple prescription to be 7 used for screening those plants for which a 8 plant-specific analysis is required and necessary in 9 order to provide the justification for continued 10 operation, or in order to guide both the owner and NRC 11 in deciding what remedial measures are necessary.

So, the slide from generic analyses to I3 plant-specific analysis is the first lesson of the last Vear's work. The second lesson of the last year's work is that these design basis evaluation model, highly conservative, over simplified sequences analyzed in this ronservative, over-simplified way did not, in fact, address the real problem in the way in which we cite.

19 I am not imputing bad faith or anything like 20 that; that is how we have traditionally always done our 21 work, but in fact, the results in my opinion, just as 22 many such results, tended to obscure rather than 23 illuminate the problem.

24 The granifather of such analysis is the 25 emergency core cooling requirements, about which a great

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1 deal has been said. But I think it is now clear to me,
2 and I think to many other people as well, that the
3 highly schematic, highly simplified, highly conservative
4 emergency core cooling approach which we approved a
5 dozen years ago is not today the way to optimize the use
6 of resources, or even to get the best safety. I will
7 give you one example from emergency core cooling which
8 most of the people in this room are familiar with.

9 It is required to calculate the behavior of 10 the plant to a loss of coolant accident with the 11 assumption that the off-site power is not available. 12 And so, we saw some designs in response to these rules 13 in which the off-site power, even if it was on, was 14 incapable because the startup transformer was too small 15 for powering all of the trains of the emergency core 16 cooling system.

17 It's a little bit like sailboard handicapping 18 rules. We had plants built to match the acceptance 19 criteria, and where we had over-simplified them, the 20 plants became over simplified and did not adequately 21 make use of cost-effective ways to improve safety.

It is my believe and the belief of my 23 colleagues who have helped me write this report that 24 this is also true of pressurized thermal shock. And we 25 have, therefore, not used the traditional design basis

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1 approach.

Now, the staff is not monolithic on this, and so we have found this very difficult. This is one of our first forays into the use of probablistic schemes, and application of the safety goal in trying to decide what level of safety should be provided, and there are gaps in the reasoning.

8 There are places where the scientific basis of 9 what we are doing is less than adequate, but it has 10 always been that way. And I will try and tell you a 11 connected story in which we will expose to you the 12 places where we used science and the places where we 13 used judgment and conjecture.

14 The outline of what I'm going to tell you 15 today is shown here.

16 (Slide.)

If have already talked some about the general have already talked some about the general approach which we used, and I will talk about it some more. This general approach involves the evaluation of the over-cooling transients which have already occurred, the deriving of initial screening criteria from this actual experience.

23 We then used probabilistic techniques to find 24 out how conservative the screening criterion is and 25 deduced from it our recommendations, and from the gaps

1 that we found in the reasoning recommendations for 2 future work and for the regulatory approach for 3 pressurized thermal shock.

Now, this approach will be seen to be both deterministic and probabilistic. The deterministic approach, as usual, has the difficulty that it is very hard to know how conservative it is, and that it is very hard to put realism into it, although we have made some serious attempt to do so.

10 The probabilistic approach is beset by the 11 usual difficulties of probabilistic approaches in the 12 present state of the art. Completeness, realism, 13 adequacy of the input data, the stuff that has been 14 debated around this table many times. And so, we have 15 put these two things together with the result that you 16 have seen and which I will discuss.

17 (Slide.)

18 The overall topology of the problem I have 19 tried to indicate in this viewgraph. Here is the 20 probability of something worse than the abcissa 21 occurring. And I have used the temperature as a measure 22 of the severity of over cooling. Now, this is an 23 over-simplification. There are lots of 24 over-simplifications in this business.

25 In fact, the temperature rate, the pressure

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1 and the characteristics of the material are all central 2 variables which have to be considered, and so this 3 considers a part of the problem; namely, the 4 transients. And since lower temperatures are more 5 severe, the curve is monotonic in this way. This is an 6 integral cumulative probability or frequency 7 distribution at some temperature. The probability or 8 frequency of getting anything worse than this 9 temperature, a lower temperature, is given by the 10 intersection of these curves, and there is some 11 unspecified probability or frequency scale.

Now, I first plot here the over-cooling transients that have actually been experienced, and this some kind of a distribution. And we have used this distribution, as I will show you, to derive in a substantially unscientific way, a screening criteria to view. We also realized, however, that experience stops we also realized, however, that experience stops sat something substantially over 200 degrees, but that nuch more severe transients are possible. And at least one such has been reported in Europe about which we know in not enough and about which we hope to find out next week in the discussions with the German RSK.

23 We, therefore, show schematically a 24 probabilistic approach in the usual way, where we 25 consider initiating events, safety functions,

1 probabilities of success or failure of the safety 2 functions and consequences, and we draw then a 3 probability consequence curve in the usual way, except 4 that severity goes to the left, so it slants the way in 5 which you don't expect from cumulative distributions.

6 And this I call for shorthand the PRA. Up at 7 this end, the PRA should satisfactorily agree with the 8 experience. Down at this eni, we have no experience so 9 in the tail of the curve we used the probabilistic 10 results because that is all we have.

In deriving these curves we find from time to 12 time sequences which are apparently outliers. If they 13 turn out not to be outliers, if they turn out to be 14 real, then the curve has to be distorted to include the 15 effect of the sequences.

For a while, we had the sequence of the week for a while, we had the sequence of the week which determined the aspect of the discussion of the week with one or another owner's group and which onstituted perhaps, if you were excitable, the crisis of the week in the regulatory staff. But we have surmounted this, and we now have a curve which has some substance to it, although by no means is this adequately fully delineated.

24 You see how far this is from the concept of 25 the design basis accident and the evaluation model,

1 simplified conservative analysis. The analyses here are 2 all intended to be realistic, and the level of safety or 3 degree of conservatism is intended to be provided by how 4 far down you go on this tail, and what you choose to be 5 the probability of what you don't provide for.

6 Now, this is imperfectly provided in the 7 present scheme, and so we have, in fact, provided at 8 least one substantial quantified conservatism in how we 9 reckon up the actual state of a given reactor vessel for 10 comparison with our screening criteria.

Furthermore, in the present state of the art really don't believe this curve very well, and the seep'e who have done the calculations have told us that there is plus or minus at least two orders of magnitude uncertainty in the frequencies or probabilities associated with the vertical location of the curve on this diagram.

Such being the case, we have not done what we would do if we had a better curve. If we had a better curve and a well-defined safety goal, we would simply plot the safety goal in probability space. Where it crossed the curve would give us the answer in severity space, and that would be the regulatory result.

24

Of course, we ion't have that.

25

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1 MR. BENDER: Steve, this seems like the right 2 time to ask this question on the matter of the 3 uncertainty in that curve. It probably varies all along 4 the curve. As you know more about what is up at the top 5 part of it than you do down at the bottom, when you 6 describe the matter of two orders of magnitude 7 uncertainty, how do you perceive it? Is it that 8 uncertainty at the tail end or is it in the middle? Or 9 is it all along the curve?

10 MR. HANAUER: Well, there are two major 11 components of the uncertainty. One is in the 12 transients. The other is in the response of the vessel 13 to these transients. The people who calculate the 14 response of the vessel, say, two orders of magnitude 15 plus or minus uncertainty in that calculation, and they 16 have told us -- I will ask Jack Stroisnider, who makes 17 these speeches to me about not misusing his 18 calculations, is it relatively uniform, as far as we 19 know?

20 MR. STROSNIDER: Yes, the vessel response, I 21 think, is uniform along the whole line, the whole curve. 22 MR. BENDER: We will leave it that way for a 23 while.

24 MR. HANAUER: Well, let me complete the 25 answer, as far as transients are concerned. The

1 uncertainty arises as much from not knowing what is
2 going to happen as from the uncertainty in how you
3 calculate it. Neither of these is two orders of
4 magnitude. If you draw your trees correctly, then what
5 might happen is represented by the various branches of
6 the trees, and then the uncertainty is calculating the
7 probability that the operator does not do something or
8 the pump does not work or whatever it is.

9 In general, the operator response is very 10 difficult to predict, and the machinery response is 11 somewhat easier, and in general these uncertainties are 12 somewhat less than two orders of magnitude.

• MR. BENDER: Well, I am trying not to prolong 14 this digression, but if I listen to what you are saying, 15 I guess I would read two things into it. First of all, 16 the people that are analyzing the vessel have assigned 17 an uncertainty to the results that represents two orders 18 of magnitude. I do not know which way the uncertainty 19 is biased or if it is biased at all. Maybe you have 20 drawn a median curve or an average curve or some such 21 thing.

In addition to that, I would have to add that there is the uncertainty associated with the transients that must be multiplied, added, or subtracted from the uncertainty in the other part of the analysis.

MR. HANAUER: Never subtract it, Mr.
 2 Chairman. Never subtract it.

3 MR. BENDER: Statistical people say there is a 4 plus or minus to everything, and that sometimes the 5 uncertainties offset each other, and I do not know in a 6 statistical sense whether this analysis comes out that 7 way or not.

MR. HANAUER: Neither do we.

8

9 MR. BENDER: I guess we have to make those10 kinds of judgments about them.

11 MR. HANAUER: That is right. What I am going 12 to show you is in general point estimates of 13 probabilities, and I wave m; arms vigorously in talking 14 about uncertainties, but in fact the science behind 15 these estimates is very modest indeed.

16 MR. BENDER: Okay. We have probably digressed 17 enough.

18 MR. HANAUER: No, it is an important point. 19 Now, where do you put design basis accidents along 20 here? A design basis accident is a specified sequence 21 of events. You get a double-ended break in the cold leg 22 at a time when the off-site power is unavailable, and 23 there is -- in addition the worst single failure occurs 24 in the emergency core cooling system. You calculate in 25 accordance with an evaluation model that requires you to

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1 throw all the water injected during blowdown on the 2 floor. You can recite this stuff as well as I can. 3 That is a design basis accident.

Such a sequence contains traditionally a large number of improbable factors. The off-site power isn't available. The water all spills on the floor, and so on. And therefore, it ought to be found rather far down in the tail of this curve. However, in fact it may be far off the diagram because of its cascading of event, of disadvantageous events that goes into it, but in fact if you can't find it on this curve, because for this curve the severity which I have represented by temperature has been calculated realistically or as realistically as we know how, and I will have a slide later, and there is some considerable reckoning in the report about the conservative and non-conservative and realistic aspects of these calculations.

So, if you want to try to put a design basis sequence on here, you will find that it is very severe. That is to say, it has a very low temperature, and if the probability is reckoned realistically, it is way off the page, but since the low temperature is also done unrealistically, you can't plot it on here at all, and there is a dysjunction between the traditional design basis approach and the approach that we are using here,

1 which is to the best of our present knowledge essential 2 and difficult to manage.

3 MR. ZUDANS: But you might remark, this is not
4 a PTS problem anyway.

MR. HANAUER: What isn't?

MR. ZUDANS: A design basis accident.

7 MR. HANAUER: Well, one approach to the PTS 8 problem would be to make a design basis PTS accident, 9 and this was in fact what the atoners did when we asked 10 them for their analysis of PTS. There wasn't anything 11 wrong with it. That is how we were all thinking a year 12 ago. It just didr.'t seem to solve the problem.

13 (Slide.)

5

6

14 MR. HANAUER: Now, let me talk a minute about 15 experience. We have had eight overcooling transients, 16 and I have represented two of them here in two 17 vu-graphs. Here is what happened at H.B. Robinson, when 18 the relief valve blew off during preoperational testing, 19 and you see the pressure went through a considerable 20 gyration, and the temperature behaved rather smoothly. 21 The two lines are for two of the three loops at 22 Robinson. The one that was associated directly with the 23 break in the secondary system came down to some lower 24 temperature which was then restored, so you see, there 25 is a temperature transient which looks sort of amenable,

1 and there is a pressure transient which goes all over 2 the map.

3 This is even more noticeable if I display the4 Rancho Seco transient of infamous memory.

5 (Slide.)

6 MR. HANAUER: Here is, again, a rather modest 7 and amenable looking temperature transient associated 8 with a pressure transient that nearly defies 9 description.

10 MR. REMICK: What temperature are you 11 referring to?

12 MR. HANAUER: These temperatures are the 13 temperatures which were measured in the cold leg, and 14 that is one of the problems in this thing. We don't 15 have any thermocouples in the downcomer. We don't have 16 any thermocouples on the vessels in these plants.

17 MR. REMICK: Is this fluid temperature? 18 MR. HANAUER: Well, it is almost fluid 19 temperature. In these plants, there is either a bypass 20 line with some resistance thermometers in it, or the 21 resistance thermometers are stuck into the cold leg in 22 wells or in clamps of some kind, and so they are 23 intended to measure fluid temperature. As long as the 24 main cooling pumps are on, they measure fluid 25 temperature rathe well. Water is well mixed in the

1 cold leg and the bypass samples this in an adequate way, 2 and the detectors stuck into the line sees a well-mixed 3 sample.

When you turn the main pumps off and you get 5 either natural circulation or stagnation, then the 6 measurement is in fact not very good. You get 7 stratification in the cold leg. You get peculiar 8 temperature changes along the cold leg as well as up and 9 down in the cold leg and it becomes a matter of chance 10 and substantial uncertainty what you are measuring.

11 What we have done in this analysis is to take 12 what these temperature measuring devices measured, since 13 we don't have a model for correcting them, and we have 14 assumed that these measured temperatures are the 15 temperatures of the water in the downcomer right at the 16 vessel wall, which is in fact a rather poor assumption 17 for some of these.

18 Okay. Finally, I show you the temperature 19 transient in the Ginna steam generator tube rupture less 20 than a year ago.

21 · (Slide.)

22 MR. HANAUER: And you will see that in this 23 case the operators did a thing which at least looks 24 bizarre on a temperature trace. They depressurized the 25 system and produced a substantial temperature excursion

1 measured in the cold leg, and you also see here a
2 stylized representation, this dotted line, of this
3 temperature transient, and that is the next thi.g.

4 MR. BENDER: Excuse me, Steve. Before you go 5 on, because these numbers and curves may get discussed 6 more later it is important to know whether we have any 7 feeling for the relationship between those temperatures 8 and what the real temperature of the vessel was.

9 MR. HANAUER: Very little, except that we know 10 there are substantial differences. I don't have any 11 analysis. We don't have a very good model, as a matter 12 of fact, although we have now the Criari experiments 13 supported by the Electric Power Research Institute which 14 are being correlated and which we have used in the 15 analysis of one of our transients, which I will talk 16 about later on, but we do not have analyses of these 17 eight overcooling transients in that respect, namely, 18 some model that predicts what the temperature of the 19 fluid was right down along the vessel wall as related to 20 the temperature in the cold lag.

21 MR. WECHSLER: Can you say the vessel wall was 22 no lower in temperature than these values?

23 MR. HANAUER: No, sir, you can't say that. We 24 can't say either of those possible statements, because 25 of the unknown degree of stratification in the cold leg

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1 during these measurements.

Furthermore, it could, at least in principle, be investigated with some calculation which would have whatever validity it had after you looked at it for a while, but this has not been done. Mr. Throm is our expert on this subject. Do you know of any calculations that have attempted to look at this?

8 MR. THROM: No, not on these specific events. 9 MR. BENDER: Monroe's question is extremely 10 important to think about, at least. If we haven't done 11 any analysis that relates back to the vessel wall yet, 12 then somehow or another I have to believe that what has 13 been going on in the last year is too generic.

14 MR. HANAUER: I thought I told you that 15 already, that it was too generic.

16 MR. BENDER: I am not complaining about that 17 observation, but somewhere along the way it seems to me 18 during this period of time those that own vessels should 19 have been doing some computations of some sort, and I am 20 a little surprised that we don't have access to them. 21 Is it that they haven't really done any calculation, or 22 they haven't provided the results? Or either one?

23 MR. HAMAUER: You will talk to the owners' 24 groups this afternoon. I suggest you ask them. As far 25 as I know, we have everything they do.

MR. BENDER: I will in fact ask that question
 2 again. Co ahead.

3 MR. HANAUER: Neal, you wanted to say 4 something? Mr. Randall?

5 MR. RANDALL: I thought there was some 6 confusion in Professor Wechsler's remarks. I think he 7 was referring to how you get from the water temperature 8 in the downcomer to the temperature at the crack tip in 9 the metal. You were referring to how you get from the 10 water temperature measured in the cold leg to the water 11 in the downcomer?

MR. HANAUER: Yes, sir, that is what I was stalking about. I don't know what -- Dr. Wechsler, was that what you were talking about?

15 MR. ZUDANS: No, I don't think so. The 16 question was very simple and straight. Is this the 17 lowest possible temperature in the downcomer or not? 18 And if you can't make that statement --

MR. BENDER: I think you said vessel. I think20 vessel is the right question to ask.

21 MR. WECHSLER: Ultimately, that is what we 22 have to know.

23 MR. HANAUER: The answer is no, this is not 24 the lowest possible temperature, because of the unknown 25 degree of stratification at the point of measurement. 29

1 MR. BENDER: It is certain that the vessel 2 temperature cannot be lover than the temperature at the 3 vessel wall. MR. HANAUER: The temperature of the fluid at 4 5 the vessel wall? MR. BENDER: Yes. 6 7 MR. HANAUER: Quite so. 8 MR. CATTON: But you don't know whether this 9 is the temperature of the fluid or not. The wall could 10 be heating up with the RTD, so that could be higher. MR. HANAUER: This is in the pipe. 11 12 MR. CATTON: It is still in the well, and the 13 well is connected. MR. HANAUER: It is a very large pipe. Based 14 15 on experience, not calculation, and not analysis, I 16 would say that effect is fairly small. 17 MR. CATTON: It sticks pretty far into the 18 pipe. MR. HANAUER: Yes, sir. 19 20 MR. BINFORD: Steve, what you are saying is, 21 you are measuring a temperature in a pipe which bears an 22 unknown relationship to temperatures elsewhere in the 23 system? MR. HANAUER: Unknown is too strong, but I 24 25 cannot certify to you that this measured temperature is

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1 the lowest temperature of water even in the pipe.

2 MR. BINFORD: But you really don't know the 3 relationship between that temperature and the 4 temperature anywhere else. You may have some 5 qualitative feeling for it, but you don't have a 6 quantitative relationship, because you don't know the 7 conditions, and that is no fault of yours. The 8 conditions are very variable.

9 MR. HANAUER: Well, the cold leg pipe should 10 be the coldest place in the system for the most 11 important transients, because the coldest water in the 12 system is being injected into the cold leg pipe.

MR. THEOFALOUS: I think that the impression to that is being generated here is that we know very little about those things, and if we had this temperature we to could almost say nothing about the temperature in the 8 downcomer, and I really don't agree with that.

MR. BINFORD: Well, I would agree with that.

19 MR. HANAUER: I don't, either.

13

20 MR. THEOFALOUS: Well, if you agree with me, 21 then why are you saying that?

22 MR. HANAUER: Well, let me try and say it 23 better, then. There is an uncertainty here, and I 24 cannot in response to somebody's guestion certify that 25 this measured of temperature as a function of time is as

1 cold as the water in the downcomer right at the vessel
2 wall can be. There is an uncertainty. This uncertainty
3 is caused by the difficulty in measuring in this large
4 pipe at very low flows, and I would not want to
5 represent, and tried very hard, maybe too hard, not to
6 represent that this temperature was the temperature of
7 the water in the downcomer right at the vessel wall. It
8 is related to it, and as you point out, we know a lot
9 more than nothing about this relationship, but we have

MR. THEOFALOUS: I guess my point was referring to this aspect of it, that I was concerned that people might get the impression that we cannot make those calculations. I think in some of your earlier statements you referred to the difficulty of making such calculations, and I guess I don't agree with that, and I don't agree that a year later we still don't have those acculations. I really see no reason for that.

19 MR. KOUTS: Was high pressure injection being 20 done here?

MR. HANAUER: On Ginna, yes, it was.
MR. KOUIS: So there was that source.
MR. AXTMANN: Does that negative spike
correlate with some action that was taken?
MR. HANAUER: Yes, the operators depressurized

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1 the primary system, reduced the pressure in the primary 2 system.

3 MR. CATTON: They were also playing games with4 the safety injection. It was on and off.

5 MR. BENDER: Steve, with great reluctance, I 6 would like to ask whether in a probabilistic sense we 7 know something about the temperature of the vessel wall.

8 MR. HANAUER: No, sir, not in the sense we are 9 talking about. We know a lot about the temperature in 10 the vessel wall. We have taken this temperature to be 11 the temperature of the water in contact with the vessel 12 wall, and we have heat transfer both at the wall and in 13 the metal calculations. What we don't know 14 deterministically or probabilistically, we have not 15 evaluated in any quantitative way the difference between 16 this temperature and the temperature of the water at the 17 vessel wall.

18 MR. THEOFALOUS: Let me rephrase my question 19 following this one. Would you agree that we can find 20 what the temperature of the wall would be if one was 21 given, let's say, a month's time?

22 MR. HANAUER: We could find this temperature 23 with some assumptions about what is going on in this 24 pipe, yes, and these assumptions would not be completely 25 arbitrary, because they have some measurements. Yes, we

1 could make some calculations.

Mr. Throm?

2

3 MR. THROM: Given an event, there is a lot of 4 information that you would like to have concerning the 5 plant conditions that we really haven't tried to get 6 together, nor really are available in a plant. The data 7 we are seeing from Criari indicates that the real 8 problem is in the very low flow situation, stagnant loop 9 flows or loop flows that are even less than the 10 anticipated natural circulation flows, and we don't have 11 data that really verifies what those conditions are. 12 Given the assumption that it was stagnant, we are coming 13 up with models that would allow you to predict what the 14 downcomer response would be, but then you are also 15 assuming either a no loop flow or some assumption of 16 what the loop flow is, and I think it is kind of 17 sensitive in that range.

18 MR. THEOFALOUS: Again I think that you are 19 trying to say that because we are not absolutely 20 certain, that is a good enough reason for not trying to 21 do the job here, and I really don't agree with that. I 22 think we know much more than what you are implying, and 23 I think a good job can be done in determining those 24 temperatures, and I think that should be done as soon as 25 possible.

MR. BENDER: We have probably belabored this point enough to be sure that there is some more discussion to be had about it, but let's go on.

4 MR. HANAUER: Now, this temperature or some 5 temperature related to it, in the spirit of the last ten 6 minutes, is the driving function for a calculation of 7 the temperature distribution in the vessel wall. 8 Because of the very large thermal inertia, we have 9 represented these rather unwieldy curves with 10 exponential temperature decays of which an example is 11 shown here in the dotted line.

We are changing our code so we can put these
13 traces in directly, but we don't have that capability.
(Slide.)

MR. HANNUER: Here is the stylized temperature mrssure transight which we have used for some fraction of our work, and I will try to be clear about where we have used real transients and where we have used stylized transients. The stylized transients begins at a temperature two zero and ends asymptotically at a temperature TF with an exponential behavior, and the pressure is assumed to be a constant. This, of course, is a gross oversimplification for some transient in which the pressure does this.

(Sliie.)

25

35

MR. HANAUER: As shown on the top of this curve. And so an improved model which, as I say, is under development, is very badly needed in this area. On the other hand, the pressure dependence is not enormous, rather surprisingly, as we will come to in a moment.

(Slide.)

7

25

8 MR. HANAUER: Now, the result of this 9 calculation is this frequency, this cumulative frequency 10 distribution. Here is the temperature, and now this 11 temperature is the temperature TF, which is used to give 12 a stylized representation of the temperature in the 13 inlet pipe as measured, and which has in it then the 14 uncertainties which we have discussed, and here are the 15 eight incidents which are calculated and discussed in 16 the report which you have.

17 The most severe one we paid any attention to 18 had a final temperature of 350 degrees. Above that, one 19 has very little problem with pressurized thermal shock. 20 And the lowest one had a final temperature evaluated of 21 225 degrees, and what we did was, we took the 350 22 reactor years for pressurized water reactors and divided 23 the numerator by the denominator, and there we have the 24 frequency.

Now, statistically, this is not very well

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1 defined with eight events in this way, but here is their 2 frequency distribution.

3 There is one other thing that needs to be said 4 about this curve. These eight incidents contained no 5 incidents at a Combustion plant, and the three worst 6 ones were at BEW plants, which, however, have been the 7 subject of substantial backfitting programs to deal with 8 the causes of these three transients. So, here is an 9 additional uncertainty. If you try and separate these 10 into three BEW events, and four or five depending on 11 which reckoning you use, Westinghouse plant events, then 12 these statistics get really awful, and we have not 13 chosen to do this, but in fact it needs to be done, and 14 this is one of the pieces of unfinished business, is to 15 investigate in a more serious way whether there are any 16 essential differences which would affect the pressurized 17 thermal shock risk in the three kinds of plants that we 18 are dealing with.

19 MR. BENDER: Steve, those eight events as you 20 have cited have resulted in some backfits, two kinds of 21 backfits, procedural changes and some charges in the 22 physical plant.

MR. HANAUER: Well, one of them is Three Mile,24 for which a very large list has been imposed.

25 MR. BENDER: The point I am trying to make is

1 this. That curve there, or whatever you want to call 2 it, is clearly not a good statistical representation of 3 anything. It is just a computed probability of an event 4 that has occurred. But when you take into consideration 5 the corrective actions, a new probability curve has to 6 be drawn. If you are only going to work on the basis of 7 historical evidence, then all the events are random, and 8 there is no way of correcting a random kind of 9 occurrence, but in view of the fact that there are 10 corrective measures that have been taken, would the 11 staff want to argue that this is probably a worst case 12 representation, or less than worst case? Are we better -13 off today or not?

14 MR. HANAUER: Well, I will give you my 15 opinion, and I will invite my colleagues on the staff to 16 flesh out the staff opinion. This is surely not worst 17 case. Much worse transients are possible, and have not 18 occurred, but there is no reason why they couldn't, 19 except their lower probability prima facie based upon 20 what is happening.

21 There is no way in my opinion that this could 22 be a worst case. Since we have had corrective measures, 23 it is my opinion that this curve is somewhat worse than 24 plants today. How much worse, well, if we do our PRA 25 very well, and if it has the kind of discrimination

1 which would show up such differences, then the PRA curve 2 would lie below this one, and if that were the only 3 reason for the difference, you would say that that shows 4 the benefit of what we have done in backfitting, or you 5 could wait ten years and draw -- or 350 more reactor 6 years and see if the curve looked any different.

7 Well, we don't have time for that. The 8 current answer, since we can't do it with experience, 9 has to be in the probabilistic evaluation which should 10 be done on the plants as they are now with the backfits 11 in, and those plants that do plant specific evaluations 12 need to do that, and it will show for a variety of 13 reasons that present day plants are better than this, 14 and that will be one of the reasons.

Now, let me invite my colleagues to say either
something different or any other remarks that should be
added.

18 MR. ZUDANS: Since most or let's say the key 19 argument in PRA is this experience, is eight data 20 points, does it represent any kind of a credible basis 21 for any statistical analysis at all?

22 MR. HANAUER: One can do statistical things 23 with eight points. We haven't done it. And Mr. 24 Bender's question is one of the reasons it doesn't 25 represent today's plants, and therefore doesn't justify

1 very much messing around in our opinion.

2 MR. PENDER: Well, there is a little bit of a 3 contradiction in the discussion. It doesn't represent 4 today's plants. I fully agree with that. And because 5 it doesn't, trying to present a frequency relationship 6 of the sort you have there distorts the problem 7 probably.

8 MR. HANAUER: Yes.

9 MR. BENDER: And distorts it in what may make
10 the public safety guestion seem worse than it really is.

11 MR. HANAUER: If you really believe that all 12 our backfits have made things better, which seems 13 probable if you look at the backfits, then, yes, this 14 gives a picture of the public risk which is worse than 15 the facts.

16 MR. BENDER: What is missing here is, and it 17 troubles me, and it troubles you, and probably the whole 18 staff, are the events that haven't occurred.

MR. HANAUER: Of course. That is what the
20 other half of this discussion is, the probabilistic
21 discussion.

22 MR. BENDER: And whether the events that 23 haven't occurred can be presented probabilistically may 24 be the crucial issue.

25 MR. HANAUER: Indeed. We are in violent

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1	agreement.
2	(General laughter.)
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MR. BENDER: Okay. Go ahead. I had not
 2 expected to reach any agreement with you, Steve.

MR. HANAUER: I now pause extremely briefly to present some results from a deterministic fracture mechanics analysis. This has gone far beyond Pellini's diagram because we now know how to calculate these things in at least in elastic fracture mechanics in a rather deterministic way.

(Slide.)

9

10 And we now have a great deal of experimental 11 and theoretical evidence that in the range of 12 applicability that this stuff does indeed predict the 13 failure modes and the failure effects of vessels made 14 out of the kinds of materials of which we are talking.

15 What we do not know, and what is the amount of 16 conservatism in this analysis for warm materials which 17 are very ductile and for which linear elastic fracture 18 mechanics is an approximation.

Now, as an old instrumentation and control engineer. I am far out of my lepth; I have studied this subject, but I am no expert in it. And so I may not even answer the first question, but call on my expert colleagues.

24 This is the result of a whole series of 25 calculations using a code similar to OCA about which the

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1 fracture mechanicians in the room know far more than I. 2 What we have done is to calculate --

MR. BENDER: Would you spell "OCA"?
MR. HANAUER: D-C-A.

5 MR. BENDER: Thank you.

6 MR. HANAUER: A whole series of stylized 7 transients, they had constant pressures and exponential 8 temperature decays. Later on I will show you some 9 results for real transients.

10 These are deterministic transients. They 11 assume that there is a flaw wherever there needs to be a 12 flaw. They include the time-dependent heat transfer of 13 the water, whose temperature is given by the exponential 14 decay into the metal and the time-dependent heat 15 conduction within the metal.

16 They include the metal properties as a 17 function of depth through the wall, as a function of 18 neutron irradiation which varies through the wall, and 19 also as a function of the local temperature which varies 20 with both time and position.

21 They include thermal and pressure-related 22 stresses, and they include the effect of crack arrests, 23 but not, in these calculations, the effect of warm 24 prestressing.

Now, the abcissa is the relative cooldown

25

1 temperature; namely, the TF from the stylized transient 2 minus RT NDT, the reference temperature which 3 characterizes the material.

4 MR. SHEWMON: They also assumed a flaw size.5 Is this a quarter of the wall size or what?

6 MR. HANAUER: No specific flaw size was 7 assumed. The flaw was assumed to be however big it 8 needed to be. I told you I would need help.

9 MR. KLECKER: Ray Klecker.

10 From the standpoint we assumed that a flaw 11 greater than, say, from the clad up to about 1 inch, 12 actually a little larger. And we looked at all crack 13 sizes within that range.

14 MR. SHEWMON: Go ahead.

MR. BENDER: That answer is not too clear to a 16 lot of us. If you are doing a computation, you have to 17 do it with explicit flaw size in mind. If I were to 18 pick a point on that curve, on any of those curves, 19 could I identify a flaw size that was related?

20 MR. KLECKER: We can go back to the original 21 calculations, yes, and pick out what that flaw size was.

MR. HANAUER: It does a search through flaw 23 sizes and picks the one that starts. If any one starts, 24 it assumes the worst flaw, not some specific depth, but 25 it looks and sees if there is any flaw that we can --

MR. SHEWMON: If it assumed the range, then there would be a probability, and I do not see any probability up there.

4 MR. HANAUER: There is no probability here. 5 MR. SHEWMON: The dividing line between crack 6 initiation or no crack initiation, there was a flaw size 7 or else there was some -- well, let us go on.

8 VOICE: Very simply, a parametric study was 9 done which assumes the presence of a flaw, and the final 10 solution was a flaw as a basis of a range of flaw sizes.

If the study showed crack initiation for any I2 size flaw from very small, let us say, quarter-inch up I3 to an inch, that initiated it. We assumed the presence I4 of a flaw. It was not probabilistic. The size was I5 indeterminate and determined by a parametric study.

MR. BENDER: Go ahead. We will come back to17 it someday, maybe not today, but somelay.

18 MR. HANAUER: Now, the original curves which 19 We saw from an early version of this study had, in fact, 20 coalesced into a single curve here and a single curve 21 there. And more detailed studies have resulted in these 22 dependencies.

Notice that the whole length here is 150 24 degrees or so, so that these differences are really 25 guite small. We have here the pressure and here the

1 cooldown temperature relative to the reference

2 temperature of the material at its inner surface. We 3 did not assume a constant temperature, and we did not 4 assume a constant reference temperature through the 5 thickness of the material. But we pinned it, in order 6 to plot it, to the reference temperature at the inner 7 surface.

8 MR. BENDER: Well, Steve, there is a shape of 9 the temperature distribution.

10 MR. HANAUER: Yes, sir. I will say it again. 11 The temperature, TF, is this asymptotic temperature of 12 the water at large times. The RT is the reference 13 transition temperature at the inner surface of the 14 ferritic material.

MR. SHEWMON: Did you use a bounding or a most for probable heat transfer coefficient to get from the T-final to the steel temperature? That has been a guestion of argument before.

MR. HANAUER: We have used several. For this
20 study the heat transfer coefficient was, I think, 300.
MR. KLECKER: I think on this one it was
22 1,000. The later ones, we used 300 or 330.

23 MR. HANAUER: We have used various numbers, 24 and this can be discussed.

25 MR. SHEWMON: And the 1,000 is bounding, and

1 300 is more likely, or what?

A

2 MR. KLECKER: I would say 300 or somewhere 3 thereabouts is more realistic.

MR. SHEWMON: Okay. Thank you.

5 MR. HANAUER: The Westinghouse calculations, 6 which give similar results, is actually a heat transfer 7 correlation and gives similar results to our 300 curves.

8 All right. Now, first of all, the two 9 families of curves are for two different values of 10 beta. The inverse time constant for the assumed water 11 transient. Here is a large value of beta where the 12 water temperature comes down quite quickly, and the heat 13 transfer is almost entirely dominated by the conduction 14 into the material.

Here is a much smaller value of beta, where Here is a much smaller value of beta, where the water temperature comes down much more slowly, and both then the water temperature variation and the sconduction into the material contribute. And as you can see, a somewhat either higher pressure or lower temperature can be tolerated if it happens more slowly, not surprisingly.

Here are the different final temperatures. If TF minus RT NDT were really a correlation parameter, these two curves would coalesce. In fact, for a 5 15-degree change in TF, there is approximately down here

1 a 15-degree change in the severity, so that they do not 2 guite coalesce and therefore, TF minus RT NDT is not 3 guite a good correlation parameter.

4 MR. BENDER: Stave, if I were concerned about 5 the pressure condition and wanted to try to make some 6 judgment about where I would like the pressure to be, 7 clearly I would like to have it as low as practical, but 8 there are some operational guestions associated.

9 MR. HANAUER: There is also a question of10 cooling the core.

MR. BENDER: Yes. And you were trying to make a judgment as to where a suitable pressure might be, where might I draw a line?

MR. HANAUER: Well, the first thing to notice shout pressure is its surprisingly small contribution if you take the more severe curves, the pressure slope from 7 zero all the way up to 2500 is only worth about 40 8 degrees. So that the stresses in this model are 9 primarily thermal, and the pressure stress is 20 significant but not really a large part of it.

For the slower one, where conditions are less severe, the pressure has much larger importance and is worth something like 100 degrees. For this purpose, you would like the pressure to be as low as possible, for the most severe transients, which turn out to be the

1 small-break loss-of-coolant accidents.

In the intermediate size where flow stagnates, the pressure calculated is about 1000 pounds. We think the pressure will hang up at about 1000 p.s.i. So you are down here, and there is not much hay to be made in trying to get the pressure much lower.

7 MR. BENDER: I do not know if you are going to 8 proceed from here to the question of crack arrest, but 9 if you are not, then I may as well lay the question out 10 here.

11 The Staff, I think, probably is following a 12 good regulatory strategy in arguing you should protect 13 against crack initiation. But in the sense of what puts 14 the public in jeopardy, there is a question of whether a 15 crack which initiates will arrest.

16 MR. HANAUER: But crack arrest is, in fact, in 17 this model, and a similar curve can be drawn with crack 18 arrest. What you get is that down below about 500 19 pounds per square inch, these curves slant to the left 20 quite strongly. I do not think I brought one with crack 21 arrest. I am sorry about that. It is in the report, 22 however, and it is also in the P&L report, very clearly 23 indeed.

24 Crack arrest seems to make a significant
25 difference only at pressures below about 50 p.s.i. Now,

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1 the models which we have used later on in our

2 probabilistic study include the effect of crack arrest, 3 and in one important transient, include the effect of 4 warm prestressing also in order to get more realistic.

5 MR. ZUDANS: Steve, do you have a similar set 6 of curves for a coefficient of 300?

7 MR. HANAUER: Such data exist. I do not have 8 such a curve with me.

9 MR. ZUDANS: Have you seen them?

10 MR. HANAUER: It becomes less severe because 11 the heat transfer is less. It is really more important 12 for this one than for this one. And my recollection is 13 they do not coalesce very much better. Somebody please 14 correct me.

MR. RANDALL: In Appendix D, page 18, there is
16 a table giving that effect of a difference of H-300
17 versus H-1000.

18 MR. ZUDANS: Which page?

19 MR. RANDALL: D.18, the biggest number in the 20 table is 29 degrees, and both of them are around 10. So 21 it would not affect that.

MR. HANAUER: It is not negligible, but it is not very large either, and I cannot tell you whether they coalesce any better or not. One would have to go took through a whole bunch of calculations to find out.

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MR. REMICK: Steve, there is something I do not understand. You talk about flows stagnating, yet when the curves that you had showed an exponential measured decrease in temperature that was fairly rapid, how could you have stagnation and temperatures changing that rapidly?

7 MR. HANAUER: Because in the first place, we 8 have not had a transient where the flow completely 9 stagnated, as far as I know. In the second place, the 10 Criari data show that there is mixing in the cold leg. 11 And this is a physical fact. The flow does not stagnate 12 all the way. The third reason is that we are injecting 13 the cold water right into this space.

MR. REMICK: I understand. But if you are
15 injecting it in, you cannot inject it in if there is
16 stagnation. Something has to be moving.

17 MR. HANAUER: Yes. The flow stagnation is not 18 total. The motion is not zero. If it were, the cold 19 water would not get into the reactor, and we would not 20 have any problem.

21 MR. THEOFALOUS: What do you mean by 22 "stagnation" now? Do you mean the loop flow, what you 23 normally call "loop flow," the flow going through the 24 loop, or convection currents?

25 MR. HANAUER: How I use it is that for a

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1 certain class of transients which turns out to be very 2 important, the net flow in the loops is essentially 3 zero, but the local flow and mixing, as was pointed out 4 a moment ago, is not zero. You are injecting cold 5 water, and it has to go somewhere. And we have these 6 measurements that show that there is a certain amount of 7 local flow and mixing. Now, when I mean "stagnation," I 8 mean that the natural circulation through the loops is 9 stopped.

10 MR. THEOFALOUS: And I thought you said the 11 Criari data show that there is good mixing in the cold 12 leg under those conditions?

MR. HANAUER: There is a substantial amount of
14 mixing. I do not know whether you want to call it good
15 or not.

16 MR. THEOFALOUS: Because my interpretation of 17 that is that the data shows there is very good 18 stratification.

19 MR. HANAUER: There is stratification, yes. 20 Levy has made a model to show the stratification and 21 what mixing takes place, and it seems to correlate a 22 substantial amount of the Criari data. And they are now 23 doing some more tests to see if it works.

24 MR. KOUTS: I thought Forrest was referring to 25 the temperature spike in the Ginna transient, and that,

I thought, was a result of temperature change which
 caused local flashing.

3 MR. HANAUER: Yes, sir.

MR. REMICK: No, I was referring to the beta. If you had a beta .12, as you did in one curve, that meant every 8 minutes roughly the temperature was changing by a factor of E, which is several hundred degrees. To me, that hardly seems like stagnation. That is what bothered me.

10 MR. HANAUER: No, that is not quite right. 11 The temperature difference to the final temperature is 12 changing by a factor of E. The exponential is related 13 only to the difference between TL and TL. So that, yes, 14 in the first 8 minutes you get about a factor of E 15 change in the temperature difference, and after that --

MR. REMICK: Well, that could be several
17 hundred degrees in 8 minutes.

18 MR. HANAUER: Our TFs are in the range of 200 19 to 350 degrees. So, yes, there is 200 to 300 degrees 20 between TO and TF; that is quite right. And in this 21 range the temperature changes quite quickly on the 22 8-minute schedule.

23 MR. BENDER: Steve, when you are making this 24 computation in the face of the other essentially 25 stagnant core circulation, the cooling of the wall is

1 dominated by the ECCS flow. Is that what you are saying?

2 MR. HANAUER: For certain transients, that is 3 true, yes.

4 MR. BENDER: Now, some people have asked 5 questions about whether the temperature of that coolant 6 of the ECCS coolant could affect the wall temperature 7 under those conditions.

8 MR. HANAUER: Indeed, it could. And warming 9 that water is one of the things that ought to be done in 10 plants with brittle vessels.

11 MP. BENDER: But the computation now is based 12 on what water temperature?

MR. HANAUER: The computation which we now
14 have, which is a Westinghouse Owners Group computation,
15 used 60-degree water, allowed for --

16 MR. BENDER: Is that centigrade of Fahrenheit? 17 MR. HANAUER: Fahrenheit. Allowed for mixing 18 in the cold-leg pipe in accordance with a model derived 19 from the Criari tests, allowed for heat transfer from 20 the cold-leg pipe wall, in accordance with a model and 21 then put this water into the downcomer, I do not think 22 with any further mixing.

I see nods in the Westinghouse bleachers.
 MR. MEYER: I am Daniel Meyer of the
 Westinghouse Owners Group.

There was some further mixing.

2 MR. HANAUER: So that was the model that was 3 used in the current calculations.

MR. BENDER: Go ahead, Stava.

5 MR. HANAUER: Now, this is the deterministic 6 calculation, and the people at Oak Ridge fixed up their 7 deterministic calculation -- or already had it fixed, I 8 do not know which -- and used a calculation of this 9 type, not on the stereotyped transients but on seven, on 10 five of the seven transients which actually occurred --11 five or six. Six, I think. One of them we just did not 12 have the data on the time-dependence, and so we could 13 not do it.

14 (Slide.)

1

Here is the results. Now, this is a Here is the results. Now, this is a deterministic fracture mechanics calculation of the kind If I described, with a heat transfer coefficient of -- what B did they use for this one? I cannot remember.

19 MR. KLECKER: That one was 330, as I recall.
20 MR. HANAUER: And what they did was they
21 calculated for each transient a value of RT NDT at the
22 interval for which no crack would be initiated even if

23 there was a flaw. That is a net result, is this solid 24 curve. And I have also plotted here as a dotted curve 25 the T evaluation of these same events off the f

1 previous vuegraph.

But now you see this is not the stereotyped anymore. For this calculation it is not necessary to represent the transient with a constant pressure and an sexponential temperature decay.

6 We used these zigs and zags in these 7 temperature and pressure plots that were taken from the 8 actual events. And as you see, it is somewhat less 9 severe because it is somewhat stereotyped, and it was 10 possible then to use a more realistic depiction of the 11 actual transient as it occurs.

And here they are plotted in the same and here they are plotted in the same strictures that the have to be placed on it for backfits since then. This represents the plants as they were at the time the for transients happened rather than the plants as they are now.

And you will observe the, crudely speaking, 19 about a 50-degree difference between these. That is to 20 say, if you believe the critical RT NDT curve, then the 21 TF representation was about 50 degrees conservative. Of 22 course, this is a better way of representing this kind 23 of phenomenon.

24 MR. THEOFALOUS: Does this mean that if the 25 calculation of RT NDT was a good one, a correct one, and

1 if the temperature in the particular transient was 50
2 degrees lower, we would have a crack initiation?

3 MR. HANAUER: No, it does not mean that. Here 4 are two calculations of the same set of transients. One 5 is stereotyped TF-style; the other uses the actual 6 transients.

MR. SHEWMON: TF?

7

8 MR. HANAUER: TF constant pressure, the same 9 business. TF constant beta, same pressure. That says 10 that for these transients RT NDT could be about 50 11 degrees higher than the TF we were using, without 12 cracking the vessel.

13 MR. KOUTS: That is assuming that the water
14 temperature according to the top curve is the vessel
15 wall temperature. According to the bottom curve --

16 MR. HANAUER: No, sir. This top curve 17 represents the water temperature by TF and beta. This 18 curve represents the water temperature by what was 19 actually measured in the cold leg. This curve has a 20 constant pressure. This curve uses the pressure as was 21 measured.

22 MR. KOUIS: Where did they get the 23 measurements?

24 MR. HANAUER: There are measurements of
25 pressures in primary systems. The temperatures were in

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1 the cold leg; the pressures are on the pressurizer. But2 the pressure, remember these are transients

3 characterized in minutes so that there should not be any 4 problem.

5 MR. KOUTS: I thought we had no temperature 6 measurements in the cold lag.

MR. HANAUER: But not the downcomer.

8 MR. KOUTS: So this assumes the measure of the 9 temperature in the cold leg is the measure of 10 temperature in the downcomer? That is what I said the 11 first time.

MR. HANAUER: I am sorry, I did not understand NR. HANAUER: I am sorr

16 MR. THEOFALOUS: So this difference then is 17 just the effect of the pressure?

18 MR. HANAUER: It is the effect of the 19 pressure. It has three effects in it: one, the effect 20 of the pressure; second, the stereotyping of the 21 temperature variation: and third, the fact that the 22 final temperature is not just a temperature that will 23 break the vessel.

24 (Slide.)

7

25 Here you see depending on situations -- here

1 is RT NDT you see out here -- and the transient can be 2 colder than RT NDT by an amount that depends on the 3 temperature, the beta, and the pressure.

4 MR. THEOFALOUS: Probably that is the main 5 effect. That is about 50 degrees.

6 MR. HANAUER: Well, 50 degrees is here. So 7 there are lots of ways to get 50 degrees.

8 MR. THEOFALOUS: If you look at the difference
9 between TF -- okay. Yes.

MR. HANAUER: It is different for each
transient. There were high-pressure transients and
low-pressure transients. The high-pressure transients
are up here; the lower-pressure transients are down here.

14 MR. THEOFALOUS: Is there any way you can give 15 a feel of how important the pressure variation is? I 16 would not guess that it is too important.

MR. HANAUER: I do not have anything hard. It
18 seems to be worth, for this low one, as much as 15
19 degrees plus; for the fast ones, rather less.

20 MR. ZUDANS: Steve, could you go back to the 21 previous slife?

22 (Slide.)

23 MR. HANAUER: Yes, sir.

24 MR. ZUDANS: And look at one of the shelves, 25 the dashed shelf, and the correspondingly solid-line

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1 shelf.

6

2 MR. HANAUER: Yes. This one and this one, for 3 example.

4 MR. ZUDANS: That is supposed to represent the 5 same event; right?

MR. HANAUER: Yes, sir.

7 MR. ZUDANS: And therefore, the probability is 8 the same. And the dashed curve shows the fluid 9 temperature at that point, your stylized?

10 MR. HANAUER: Yes.

MR. ZUDANS: And the solid curve represents
which RT NDT would initiate the crack; is that right?
MR. HANAUER: Yes. In accordance with this
nodel, of course.

15 MR. ZUDANS: And the fluid temperature, of 16 course, and the solid curve varied all over the slope?

17 MR. HANAUER: Yes. We used the measurement in 18 the cold leg to represent the fluid temperature.

19 MR. ZUDANS: This actually then shows what you 20 said how much higher the RT NDT yould have to be than 21 the fluid temperature?

22 MR. HANAUER: Exactly. Okay.

23 Now, from this collection of information, we 24 derived a screening criteria.

25 (Slide.)

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Now, I have to tell you plainly that there is not as much science as one would like in the derivation of the screening criterion. I will also tell you exactly how we did it, which will tell you how little science there is.

6 What we did is, we had a much earlier version 7 of these curves. Because our initial curves had some 8 mistakes in them which the industry owners groups 9 pointed out to us, and they were right in some of them, 10 and so we made some major changes in our curves from the 11 ones we had in June to the ones we have now.

12 On the original set of curves -- completely 13 arbitrary, because we did not have the Strosnider 14 results at that time in the form in which we have them -2 15 now -- I took 10, a completely arbitrary value based 16 on the idea that anticipated operating occurrences have -2 17 a frequency bound of about 1 in 40 years. So 10 is 18 comfortably below that.

But without any really scientific basis, I -2 20 took 10 , and at that time this curve crossed the 260 21 and this curve crossed at 280. The 50-degree difference 22 had not shown at that time, and so I held my nose and 23 picked 270.

24 Now, that is the amount of science there is in 25 the 270-degree screening criterion. But since that time

1	we have developed some better idea about how
2	conservative it is.
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14	그는 모양에 관계했는 것 같은 방법에 가지 않는 것 같이 것 같이 하셨다.
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If you really believed these curves and wanted to use them in some detail, and if you really any -2 scientific basis for 10, you would pick a number in the low 300's for the screening criterion based chattis curve. It is my opinion that that is too high, based upon some probabilistic discussion that I will give you 7 a little later.

8 There is really more justification to 270 than 9 that, but the original basis is indeed rather thin.

10 MR. BINFORD: Steve, let me ask one question 11 here. It appears to me that the dotted curve is merely 12 the solid curve, as you have said and presented in a 13 stylized fashion. Once you have the solid curve, which 14 is the actual conditions, what is the use of using the 15 dotted curve at all?

16 MP. HANAUER: The dotted curve is a grosser
17 approximation, which I don't use much any more.

18 MR. BINFORD: Well, it just appears to me that 19 all this does is to demonstrate that your simplification 20 is reasonable.

21 MR. HANAUER: Now, the reason to show the 22 dotted curves in the Tf is that we had to do our 23 probabilistic work using Tf, We don't have the codes 24 today to do RT critical for the probabilistic work. We 25 will one of these days, but today we ion't, and that is

. 1 one important estimate. I have carried the Tf along. 2 So the screening criterion -- and I will get 3 to a stopping place, Mr. Chairman, in about, I predict, 4 ten minutes or so. 5 MR. BENDER: Fine. MR. HANAUER: Well, I will one way or another 6 7 get to a stopping place pretty soon. 8 MR. BENDER: Why don't you announce when you 9 would like to break. 10 MR. HANAUER: Yes, sir. You will see my 11 coattails disappear through the door. 12 (Lauchter.) 13 So all the work I have been talking about so 14 far is for longitudinal cracks, and so we picked 270 15 degrees for longitudinal cracks in the manner which I 16 have described. We then ask, what about circumferential 17 cracks. This turns out to be very important, for three 18 reasons: 19 First of all, it's different and in some 20 vessels the circumferential cracks, the circumferential 21 welds will dominate because they contain higher copper 22 material; Secondly, some vessels don't have longitudinal 23 24 welds, and for those vessels the circumferential welds

25 will surely dominate;

And thirdly, the consequences for a severe vessel break all the way around the circumferential weld are substantially more serious.

MR. BOCK: Steve, what about plate material?
MR. HANAUER: I beg your pardon?

6 MR. BOCK: What about the reactor vessel plate 7 material? Don't the vendors believe in some cases it is 8 more limiting than the welds?

9 MR. HANAUER: There are some cases on which 10 the plate material is more limiting. In that case you 11 don't have any good reason for picking one crack 12 orientation over another until we learn something about 13 rolling directions and so on, about which I think very 14 little is known today about flaws. And I suppose for 15 those vessels one should pick longitudinal flaws, for 16 lack of any information.

17 There are only a small number of such 18 vessels. In general, the copper-coated welding 19 electrodes in the vessels of interest created a material 20 which is substantially more susceptible to radiation 21 embrittlement, and so the welds almost always dominate 22 in all of the high-brittle vessels. In general, even in 23 vessels where the plate dominates the situation is 24 reasonably in hand.

Now, there are a few vessels about which we

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1 know very little, and here we are simply going to have
2 to get some more information if it can be hand. The
3 circumferential crack therefore has to be treated. It
4 is restraint-contrained in an entirely different way, as
5 the crack begins to open in the fracture mechanics
6 calculation. And of course the pressure stress is half
7 as much for the circumferential flaw as it is for the
8 longitudinal flaw, because of the way longitudinal and
9 hoop stresses are related in a pressure vessel.

We put these into a series of calculations which are reported : Appendix D, and the result is we have selected 300 degrees Fahrenheit as approximately sequivalent to 270 degrees for longitudinal flaws.

MR. SHEWMON: When I see "longitudinal crack" Is up there, should I think of a longitudinal weld, that 16 this crack then -- so the crack is always running in the 17 weld material?

18 MR. HANAUER: Yes, sir. That is the picture 19 we have.

20 MR. SHEWMON: That is not the picture I was 21 shown yesterday by one of you guys. But let's go 22 ahead.

23 MR. HANAUER: That is our current picture, and 24 our current model is based on long longitudinal cracks 25 or long circumferential cracks.

MR. SHEWMON: Running always in weld 2 material?

MR. HANAUER: Yes, sir.

Okay. Now, a final question in deterministic space is, okay, suppose that is the criterion, how do we evaluate the vessel in Skunky Hollow Unit No. 3 and determine its properties to be compared with the screening criterion.

9 We convened a peer group, an expert group, to
10 do this.

(Slide.)

3

11

And their recommendation, which we have adopted, is the following: The RT NDT of any given vessel at any given time is of course -- starts at some initial value and then increases in accordance with the formation. I will come back to this and talk about the rediation. I'd better talk about them now.

18 Neither of these things is known perfectly, of 19 course. There are substantial measurement 20 uncertainties, and also there are uncertainties 21 regarding the material which is being measured. In many 22 cases the material which is being measured is not the 23 actual weld or a prolongation of it, but a qualification 24 piece which was made on a different day, with nominally 25 the same materials.

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And so there are at least these two sources of uncertainty. Now, for some vessels and for some weld types, less material is available and so one is forced to consider a population of vessels and welds to infer the properties of weld X in vessel Y from a much larger population, which may or may not be made of the same material.

8 MR. SHEWMON: I used to think that a best 9 estimate was something like a median or mean value. 10 have yet to see anybody who works for the NRC give me a 11 median or mean value. So is that what I will term an 12 NRC best estimate, or is that sort of a best estimate in 13 the sense of mean or median?

14 MR. HANAUER: As one NRC employee, I will tell 15 you that what is intended there is the mean or the 16 median.

17 MR. SHEWMON: Okay.

18 MR. HANAUER: And you will find in Appendix P 19 of the report values for this which may convince you 20 that at long last somebody in the NRC is trying to do 21 that for best estimates. It comes hard. Our whole 22 tradition is different.

23 Now then, the object is to use the best 24 estimate of the initial measurements, which are 25 available for almost all vessels, and then to use

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1 Guthrie's correlation for different families, different 2 populations of weld materials, to estimate the change as 3 a function of irradiation.

Now, this is not a simple matter. We have already had a discussion this morning with one of the owners groups who would like to quarrel with some of the numbers in Appendix P. We seem to be forever quarreling with the numbers in Appendix P.

9 There is, first of all, the calculation of 10 neutron leakage flux, a subject understood by at most 11 seven people in the world, I think.

12 (Laughter.)

13 And calculated with great difficulty. The 14 codes are not very easy to use and the assumptions that 15 go into the codes can be argued about almost 16 interminably.

17 Having calculated the flux at the inner 18 surface, it is necessary to calculate the attenuation of 19 the neutron flux through the wall and the change in 20 neutron energy spectrum through the wall, because the 21 energy of the neutrons determines their effect on the 22 properties of the material.

23 This matter can also be discussed at greater 24 length. I will say today, I will say now, it could be 25 respend at much greater length if you want. We now use

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a model somewhat different from the one in Reg Guide
 1.99 which includes, we think, the effect of the
 3 spectrum hardening through the wall, and we have Mr.
 4 Lois and others who are prepared to discuss those
 5 guestions with you.

6 Then, for conservatism -- and this is one of 7 the places where we put it in explicitly -- for 8 conservatism we add twice the standard deviation of this 9 value. Since there are two components, we consider 10 separately the standard deviations involved in these two 11 components. And since they arise from different 12 physical phenomenon, we add them up at statistically 13 uncorrelated standard deviations.

14 So the result is the initial, the change, plus15 two standard deviations.

16 MR. BENDER: Steve, in putting in the two 17 sigma allowance you are trying, I suppose, to bound the 18 data?

19 MR. HANAUER: Yes, sir.

20 MR. BENDER: How much of the data is bounded 21 by that?

MR. HANAUER: I'm not an expert on this. I have seen the curves and it is, two sigma gets the right percentage of it, which is 95. And there are in Souther diagrams that show these bounding

1 curves and how they do it, and there is -- has Guthrie's 2 report come out? Where is Les?

3 MR. RANDALL: This is George Guthrie. 4 MR. HANAUER: How do you do, sir. I have 5 never met you. Has your report been published?

MR. GUTHRIE: Not yet, no. No, sir. MR. BENDER: Is it necessary to cover 95 7 8 percent of the lata?

9 MR. HANAUER: Well, how bounding would you 10 like to be? Would you like to deal with a best 11 estimate, with one sigma, with two sigma, with something 12 else? That selection has a lot of arbitrariness to it.

MR. BENDER: Well, if every point in a set of 13 14 curves had equal weight, I guess I would probably accept 15 the argument pretty well. I'm not sure that the points 16 should be given equal weight, because there is a lot of 17 variation in how the determinations are made.

Can you comment on that? 18

6

19 MR. GUTHRIE: Well, they were given equal 20 weight. But we also had in here, there are two factors 21 to the uncertainty. One part of the uncertainty is due 22 to the fact that we don't know. When we are fitting a 23 curve, we have a Sharpey shift given to us for each 24 point. We have the chemistry given to us for each point 25 and we have the fluids given to us for each point.

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1 That assumes that there was an error in the 2 fluence. There are several errors in each of the data 3 points that have to be considered. There is an error in 4 the reported chemistry, there is an error in the 5 reported fluence, and there is an error in the reported 6 Sharpey shift.

7 I took into account the errors in the Sharpey 8 shifts, I took into account the errors in the fluence, 9 and I minimized the sums of the squares of the errors 10 between, the discrepancies between the measured Sharpey 11 shift value and the calculated Sharpey shift value, plus 12 the sums of the squares of the errors between the 13 reported fluence and the fluence as it was adjusted by 14 the fitting code.

15 In other words, the fluence for each one of 16 these points was an adjustible parameter, and within 17 that sort of a method all of the points were weighted 18 deeply.

19 Other people have made studies where they have 20 studied various populations separately and they find 21 that the exponential power, the exponent on the fluence, 22 is different for welds and for plate material. In 23 particular, Combustion Engineering has an opinion that 24 the exponent on the fluence for weld material is a lower 25 value than for the plate material.

MR. BENDER: Well, that's enough for now.
 MR. HANAUER: Here is the Guthrie correlation,
 or one of the many depictions of the Guthrie
 4 correlation.

5 (Slide.)

6 This is hard to see, so the abscissa is the 18 19 20 7 fluence 10 , 10 , 10 ; the ordinate is the RT 8 NDT plus 2 sigma, which had to be uncoupled. And as you 9 can see, this is for three different percentages of 10 copper and these are the correlations we are using. 11 Now then, these correlations, as you can see

12 from this simplified curve --

13 (Slide.)

Here is a curve which is intended to show schematically how these things go together. Here is Guthrie's mean curve here for copper and nickel, and here's Guthrie's mean curve plus two sigma. And I've added in the sigma in the RTO also, which would move these curves up or down depending on what RTO was. However, the Guthrie correlation gets very large at very large levels of fluence.

And we believe that the Reg Guide 1.99 limit and we believe that the Reg Guide 1.99 limit and we believe that the Reg Guide 1.99 limit and twice the Reg Guide 1.99 already is a limiting the curve, we added twice the value of the initial standard

1 deviation and didn't put in another term with the 2 standard deviation in it. It is already in it.

3 So that the way in which we predict RT NDT for 4 this vessel is we decide, we estimate the fluence at 5 some particular time and then we go to this curve, which 6 -- we go to this curve, plus the RTO, whatever it was. 7 And if the fluence is higher than this amount, we use 8 the Reg Guide 1.99 limit.

9 And this then is a defined procedure for 10 giving a conservative estimate of the state of any 11 particular vessel. The results are shown on the next 12 vugraph. You had better use your handout, because my 13 vugraph machine did me dirt and this is essentially 14 illegible.

15 (Slide.)

16 I'm sorry about that. I don't have my handout17 up here. I will try and work from this.

Here are the first seven plants in Appendix P.
19 Table P-1 in your report. Here is the initial RT.
20 Notice that we have numbers like minus 56, so I hope,
21 Dr. Shewmon, you can accept that we really tried to do
22 some best estimate here.

Here is the delta obtained in the way that I Here is the delta obtained in the way that I A have described, and here is the standard deviation for a Interpopulation. The two standard

1 deviations is 60 degrees, but some others are no 2 better.

And here is the result as of the last day in December in 1981, that being the date for which these calculations were made. And these are more or less in order, and you will see that in the right-hand column is quite a crude estimate of when these plants will exceed the screening criterion.

9 The first one is Robinson Unit 2 -- or Unit 3, 10 which will exceed the criterion in February 1987, four 11 and a half years from now. So that even for our lead 12 plant, our lucky lead plant, there is a substantial 13 amount of time to do something.

14 MR. BENDER: Steve, is that prior to actions 15 to change the fuel?

16 MR. HANAUER: These estimates are now somewhat 17 -- Neil, do you want to comment?

18 MR. RANDALL: For Robinson we took into 19 account the reduced fuel loading because we had the 20 numbers. All of the others, we did not take into 21 account reduced flux.

22 MR. HANAUER: This is obviously a somewhat 23 moving target. Fuel loadings change, calculational 24 methods are improved. And so I predict by the end of 25 this year there will be a different set of numbers. I

1 know last year there was a different set of numbers.

2 MR. BENDER: When you look up there you become 3 aware of the two sigma value, which doesn't look like a 4 very big number by itself.

5 MR. HANAUER: Plus or minus 60 is not small.

6 MR. BENDER: It is an important number, but if 7 it were the only one --

8 MR. HANAUER: I've seen whole days spent on 9 10-degree differences.

10 MR. BENDER: I'm sure that is the case, and as 11 a matter of fact you are sort of leading to the question 12 I was trying to ask. Because there are a lot of other 13 places where those incremental values are being put 14 together, you are led to wonder how many numbers like 10 15 to 30 degrees are being cranked into that value.

16 MR. HANAUER: Into this value? I hope none in 17 this value. Now, you might ask how much of that stuff 18 is in the screening criterion. The answer, there is a 19 fair amount in the screening criterion. The OCA code, 20 for example, assumes that there is a flaw every place 21 there needs to be a flaw; what is that worth? And the 22 probabilistic discussion after the break gives some 23 insight into that.

24 MR. CATTON: What is ten degrees worth in 25 years, just to get a feel for those numbers?

MR. HANAUER: One to three.

2 MR. CATTON: One to three years. So 30 3 degrees up there would be three to nine years?

4 MR. HANAUER: Yes. It's a lot of years. 5 MR. CATTON: So it is important.

MR. HANAUER: Yes.

1

6

7 MR. BOCK: Of the RT NDT numbers given up 8 there, can you break those down as to which are 9 Guthrie-limited and which are 1.99 limited?

MR. HANAUER: It can be done. I can't do it.
MR. SHEWMON: Is he approaching the end? Are
we going to take a break?

13 MR. HANAUER: Yes. This is my last pre-break14 vugraph.

15 MR. SHEWMON: Well, before or after the break, 16 I would like to hear a discussion of whether the 17 operators are sent home the days we think we're going to 18 get a transient, whether we are doing anything to work 19 with them. That discussion has been completely devoid 20 in that area.

MR. HANAUER: Yes. That is after the greak.
MR. BENDER: Are there any other questions?
MR. REMICK: On Robinson, Steve, the
difference in the delta RT between the circumferential
and the axial, is that due to a difference of materials

1 in the weld material or is fluence factored into that
2 difference?

3 MR. HANAUER: Both factors are there, but the 4 largest one is the difference in the copper content of 5 the weld.

MR. REMICK: Thank you.

6

7 MR. BENDER: This sounds like the right time. 8 MR. SHEWMON: One last point, and we will see 9 what we're talking about after the break. Not that 10 those sorts of things have ever inhibited this Committee 11 particularly.

But I have the feeling that these numbers are But I have the feeling that these numbers are probably about what they should be, or at least much of the gross conservatism has been squeezed out of them. The other thing comes back to how these relate to the fearticular trip points that you have said and what is related to the her these criteria or trip points or hatever you call them do happen, and that maybe we will discuss for the next couple of years. But maybe we will discuss it today.

21 MR. HANAUER: We will discuss it at some 22 length after the break.

23 MR. SHEWMON: Fine. Okay.

24 MR. ZUDANS: The explanation of difference in 25 delta RDT was given as being different chemistry in the

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1	welds. So why are the initials the same?
2	MR. SHEWMON: Because we don't know any
3	better.
4	MR. BENDER: Could we break now and let Dr.
5	Zudans get that question after the break?
6	(Recess.)
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MR. BENDER: If we could reconvene, there may 2 be a couple of open questions yet. Bob?

3 MR. AXTMANN: If I heard you correctly before 4 the break, you were saying that neutron spectrum hardens 5 while it goes through the wall. Is that right?

MR. HANAUER: Yes, sir.

6

7 MR. AXTMANN: Could you explain that a little 8 bit?

9 MR. HANAUER: Not very well. I will call on 10 the experts very soon. The neutron damage comes from 11 the interaction of the fast neutrons with the atoms in 12 the metal.

13 MR. BENDER: Could we have some quiet in the 14 back of the room, please?

15 MR. HANAUER: The nominal measurement of 16 neutron flux to include all neutrons above one MEV and 17 no neutrons below MEV is a gross approximation. In 18 fact, there is a spectrum of damage per interaction 19 which depends in a continuous way on the neutron 20 energy. There are various models to represent this. 21 The model which we presently favor uses displacement per 22 atom of the metal as a function of neutron energy. When 23 you do this, you will find that, and you have to know 24 the interaction probability as a function of neutron 25 energy, which of course changes.

1 When you do that, you find that the neutrons 2 of lower energy have a higher probability of 3 interacting, and therefore as this beam of neutrons goes 4 through the material, the lower energy neutrons are 5 preferentially removed, and so the beam is attenuating 6 as it goes through the material, but the beam at the ---7 deep into the material has proportionately a larger 8 fraction of higher energy neutrons which have a higher 9 janage potential per neutron, and there is a model for 10 this based upon metallurgical and neutron physics 11 measurements.

MR. AXTMANN: Thank you.

12

13 MR. HANAUER: Now, if you want anything more14 than that, I have to call on my experts.

MR. BENDER: Let's presume he doesn't. Any 16 other questions?

17 MR. HANAUER: I left one open, which is the18 operator thing, which I will get to.

19 MR. WECHSLER: Steve, you mentioned just 20 before the break the fact that the Guthrie regression 21 analysis leads to very high delta RT NDT's at the higher 22 fluences, and that because of that, you choose to use 23 the Reg. Guide 1.99 curve to govern at the high fluence 24 rate, at the high fluence portion of the curve. I 25 wonder if you could amplify that a little for me. I am

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1 a little puzzled, because if the Guthrie analysis leads
2 to high values, one has to feel that that is because the
3 surveillance results lead to high values at the high
4 fluence end, and thus there must be some rationale that
5 allows you to prefer to go to the Reg. Guide rather than
6 the Guthrie fit at the high fluence end.

7 MR. HANAWER: Well, a little is all I can 8 discuss it, and then I will refer to my experts. The 9 Guthrie correlation, and we have Mr. Guthrie to discuss 10 it, chose to use a very simple form for the correlation 11 which was justified in many different ways. When you 12 look at how it relates to the data at very high fluence. 13 we have decided that in fact it is substantially above 14 the data in the very high fluence in spite of its 15 overall least squares characterization, and in our 16 examination of the data at high fluence, we believe that 17 the Reg. Guide 1.99 satisfactorily bounded the data.

18 Now, that is an extremely general answer, and 19 I will call on Mr. Randall and Mr. Guthrie to 20 collectively or together to answer you in more detail.

21 MR. RANDALL: Well, when we applied the 22 Guthrie mean plus two, some of the squares, sigma nought 23 plus sigma ielta, and compared that number with the Reg. 24 Guide upper limit plus the two sigma nought, the former 25 was higher, but we know that we don't have any

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1 surveillance data which fell above the upper limit line
2 of the Reg. Guide 1.99, which was an upper limit line,
3 so we simply said we won't make them use a number higher
4 than any we have observed, and that is why we fell back
5 to Reg. Guide 1.99 in that fluence region.

6 MR. ZUDANS: But that raises another 7 question. You did that yet in the rest of the portion 8 those data points were included. Then the correlation 9 would have been different if you dropped those points, 10 the ones -- the section of the curve you based on Reg. 11 Guide 1.99 covers a certain range of points, data points 12 that were put in the correlation that affected the 13 previous set, and that means in one cases you included 14 them and in one case you didn't, and that is rather 15 arbitrary.

16 Is that what you did? In other words, there 17 was a set of data points where the correlation would be 18 right. The Guthrie correlation exceeds that Reg. Guide, 19 and at that point you say, okay, because the Reg. Guide 20 is known to be a bound, you use the Reg. Guide yet you 21 leave the correlation the way it was. And actually, you 22 should have excluded those points in the correlation to 23 see what the correlation does then.

24 MR. BENDEP: So you are saying break it into 25 two populations.

MR. ZUDANS: That is right. Did you do that 2 or not?

3 MR. RANDALL: No, we did not.

4 MR. ZUDANS: In that case it is guite 5 arbitrary.

MR. RANDALL: Well, if I understand you, we 7 did not go back and redo the Guthrie correlation.

8 MR. ZUDANS: But, see, the Guthrie correlation 9 is affected by those points beyond certain fluence.

10 MR. RANDALL: Certainly.

11 MR. HANAUER: Perhaps Mr. Guthrie could 12 comment on this point.

13 MR. WARD: Were there any data above that 14 fluence in the Guthrie correlation?

15 MR. GUTHRIE: As I understand it, whether --16 MR. RANDALL: This comes about because of the 17 addition of the two sigma nought plus the sigma delta 18 squared. There is a scatter point that will show you 19 what the data were.

20 MR. WECHSLER: That is Page 17 in Appendix E. 21 MR. RANDALL: Yes, E-17 is right. Now, that 22 shows how well the Guthrie formula fit the data base 23 that we had. Now, when we add that plus two sigma line 24 is really two sigma on that calculation, which is two 25 times 24 degrees or 48. It does lie above the points of

1 the high fluence, and maybe that explains why there is 2 this difference.

3 MR. WECHSLER: That lies above the points at 4 low fluence as well.

MR. RANDALL: Yes, it does.

5

6 MR. WECHSLER: So that would hardly be a 7 reason. The fact remains that the residual calculated 8 minus observed for data points, let us say, above 9 10 shows roughly the same scatter as the points 19 10 below 10 , as the points far below 10 . So I have 11 to say I really don't understand your answer.

MR. SHEWMON: Would you restate your original 13 guestion?

MR. WECHSLER: Yes. My question relates to the statement that Steve Hanauer made that the Guthrie fit, the Guthrie equation shows very high predicted relate T or delta RT'S NDT and for that reason instead of using the Guthrie fit for the higher fluences, they echose to use the Reg. Guide 1.99, and so I asked, what to is the rationale for having done that. I understood Neal Randall to say that the reason was, as you can see in this figure, E-17 in Appendix E, you can see that the plus two sigma line is above all the residual values in that plot, not just those that pertain to fluences above 19, and so I still remain uncertain as to the

1 rationale for using the Reg. Guide above 10 .

2 MR. BANDALL: All I can do is repeat my 3 original statement that being pressed to not be 4 overconservative, we used Reg. Guide 1.99 upper limit in 5 that region because no data points from surveillance 6 fell above that Reg. Guide upper limit curve.

7 MR. BINFORD: If you superimposed on that 8 diagram of E-17 the Reg. Guide 1.99, I wonder what it 9 would look like.

MR. RANDALL: I have not done that.

10

MR. GUTHRIE: I was not intimately involved in 11 12 drawing this broken part of the curve there, where the 13 1.99 went in. But if you look at this figure that we 14 have been referring to for the last couple of minutes, 15 if you became sympathetic to the owners and wanted to 16 give them as much as you could and still maintain 17 safety, you could draw a slightly tilted line in the 18 upper righthand part of the figure and still bound the 19 data that is plotted on this graph, and this does give 20 -- well, it doesn't penalize the owners as much as they 21 would be penalized if you used the plus two sigma lines. It is possible to draw another straight line 22 23 which intersects the plus two sigma line somewhere 19th 24 around 1 x 10 , and goes down to the right, and 25 therefore is lower in the higher fluence ratings.

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19th

MR. WECHSLER: I see, so you are essentially 19th 2 saying that above 10 in Figure H-17, there are 3 more points lying above the zero line than lie below 4 it. In other words, your formula overpredicts based on 19th 5 the actual data for fluences above 10 .

6 MR. GUTHRIE: In H-17, what I am saying is 7 that in that pattern under the plus two sigma line in 8 the upper righthand corner there, if you wanted to give 9 the owners everything you could without sacrificing 10 safety, you could draw that plus two sigma line with a 11 slight downward slope up there in the upper righthand 12 corner -- you don't have to keep it flat -- and still 13 cover all the data that is available.

14 MR. BENDER: Let me ask, if I can, that we 15 leave the detail of this discussion to the private 16 conversations. I want to get Dr. Hanauer through this 17 story today, and we may be able to come back to this or 18 get to questions later on.

MR. ZUDANS: There still remains this question 20 that 1 asked, namely, why the population wasn't split up 21 into two pieces at that point.

MR. BENDER: You might even ask whether it 23 should be in several populations, or whether you should 24 have a straight line. There are a lot of things you 25 could ask. Or how good is the fit.

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Bill, did you have something different?

2 MR. BOCK: Well, I wanted to elaborate a 3 little bit on this subject. I think I know what the 4 problem is. But we could defer that. I can do it in 5 about two minutes, or we could defer it.

6

1

MR. BENDER: Well, go ahead.

7 MR. BOCK: The problem, I believe, is not so 8 much the fluence as the nickel, and if you flip over two 9 pages to where you see percent nickel as the abcissa, 10 virtually all of the test specimens used have a nickel 11 composition of less than .75 percent, so we have good 12 data in that range, but we are now trying to apply it to 13 vessels with much higher nickel content, for example, 14 Robinson is 1.2, or Calhoun with 1.0.

15 So, we are beyond the range of experimental 16 data, and we are trying to extrapolate out there.

17 MR. BENDER: Well, that is one viewpoint.18 Steve, I think we had better go ahead.

19 MR. HANAUER: What I propose to do now is to 20 talk about the probabilistic analyses we have done, to 21 bring in the question of what the operators do and what 22 we have done about what the operators do, and then to 23 talk about where we go from here.

24 The probabilistic analysis in June was viewed 25 by us as a long-term research program. However, as a

1 response to our June position paper, in this room, the 2 industry pointed out a number of things which in their 3 opinion we have done incorrectly, and brought to us in 4 May, actually, a Westinghouse owners' group 5 probabilistic study of pressurized thermal shock that 6 provided a great deal of insight, and which has, I 7 certainly hope, been provided to you.

8 There is a very large amount of documentation 9 on this whole subject. You will find it summarized in 10 Appendices A and B of the report. If the working group 11 discovers it doesn't have some important pieces of 12 paper, they may lay the oversight on us, and we will of 13 course make all of it available. I don't believe any of 14 it is proprietary, but if it is, we know how to do that 15 too.

Now, we have a research program going on which not a couple of years will presumably walk in the same footsteps as the work I will now describe, perhaps with additional precision and completeness, perhaps not, but the work I will now describe is the work of the Nestinghouse owners' group reported to us in a May letter and in several meetings between June and now.

23 What they did was to consider about 20 24 initiating events that could lead to overcooling 25 transients and pressurized thermal shock. They then

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1 drew in the usual way event trees and safety functions,
2 and determined which event sequences of the possible
3 ones were in fact significant in terms of probability
4 and could in fact result in pressurized thermal shock
5 sequences. Those that they consider co be significant,
6 after some of our discussions, they then characterized
7 in terms of TF, theta, and constant pressure, and
8 frequency or probability as a result of their evaluation
9 of the trees.

10 They then used Strosnider's results, which 11 have been discussed with the subcommittee on several 12 occasions, and which I will recapitulate very briefly, 13 to determine probabilistically an evaluation in detail 14 of the curve beyond but including the range in which the 15 experience was involved.

Now, here is the place I suggest to consider the role of the operator in the actual experiences, the role of the equipment functionability, and the actions of the operator determined which sequence actually took place in these eight events amongst the dozens or hundreds of possibilities of sequences, and so what we have in these eight events, evaluate them how you want, what they have evaluated is the eight sequences which actually occurred, and any inference you draw from them sasumes that the operator actions as well as the

1 equipment actions of those eight sequences are somehow 2 typical of how the operators and the machinery works in 3 a more general way.

4 Now, we know that at best such an 5 extrapolation is only approximate, and that the right 6 way to do it is to consider all of the possible 7 sequences or all of the significant sequences, and to 8 include in them in some way at the branch points the 9 operator does or does not do this or that important 10 function which significantly affects the output of the 11 pressurized thermal shock sequence.

Now, the methodology, the science behind this is not very well developed. Swain and his co-workers at Sandia have over the past number of years published a number of handbooks and methods to estimate the he probability of whether the operating crew will or will not do some necessary thing. We have at this time no methods for estimating whether the operators will do better than that and will in fact mitigate the situation beyond their stereotyped procedures.

21 Similarly, we have at the present time no 22 models for predicting whether the operators will do 23 something bizarre and make the situation worse outside 24 the parameters of their operating procedures. About 150 25 miles north of here is one data point in which the

1 operators did in fact do some bizarre things, and the 2 consequences were severe indeed. However, we don't have 3 at this time any really scientific way of making such 4 predictions, although we do have the beginnings of a 5 scientific way of predicting whether they will or will 6 not do some defined correct thing.

Now, this has been handled in two ways which are really quite liverse. In the Westinghouse probabilistic study, the Westinghouse owners' group probabilistic study, one of the parameters is the time delay of the operators in doing certain important, correct things, and one of the time delays is infinity, they don't do it at all, and so operator action has been included in this way in the probabilistic study.

Now, it is also clear from the pressure curves which I showed earlier and from the course of some of the actual events that the operators can really make things a lot worse or a lot better, and so we have in progress and more than half completed a program in which we have audited the procedures related to pressurized thermal shock in the eight plants for which we got pressurized thermal shock evaluations from the licensees 18 thermal shock the procedures from the licensees

24 Then, in addition to auditing the procedures,
2 audit team has discussed with representative members

1 of the operating crew how well they understand 2 pressurized thermal shock, and has assessed in an 3 extremely crude way the likelihood of whether these 4 operators would do the right thing in a pressurized 5 thermal shock sequence. This evaluation was not 6 quantitative, but was rather an overall evaluation. The 7 results have been varied. Some crews did rather well 8 and some crews did rather poorly.

9 These audit results -- I guess there are now 10 three or four, Jim, that have been issued. Do you 11 remember?

MR. CLIFFORD: All of them have been
13 completed. The reports are in and should be distributed
14 very shortly.

15 MR. HANAUER: There are a few reports that 16 have already been distributed, aren't there?

17 MR. SHEWMON: The Robinson report was
18 distributed several months ago. We have not seen
19 anything since.

20 MR. HANAUER: Jim, what is the present status, 21 please? Mr. Clifford.

MR. CLIFFORD: Jim Clifford of the staff. All 23 of the reports have been received and submitted to 24 licensing and should be distributed shortly.

25 MR. BENDER: We have seen more than one, but I

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1 don't think we have seen them all.

2 MR. HANAUER: You have certainly not seen them 3 all. At least one has been deferred.

4 MR. SHEWMON: Well, I haven't, and the 5 consultants who are most interested in that haven't.

6 MR. BENDER: Well, I agree with that, that 7 chey haven't been probably generally distributed.

8 MR. HANAUER: The results have been, there is 9 one other piece of information, and that is, there is an 10 ongoing very large and well known to the Committee 11 improvement program in emergency operating procedures 12 involving a large program of realistic analyses of a 13 large number of event sequences. The correlating of 14 these realistic analyses into new technical procedure 15 guidelines, including some symptom-based guidelines for 16 maintenance or restoration of the critical safety 17 functions, this is under Three Mile Island Action Plan 18 Item 1-C-1. It has been going on for at least a couple 19 of years, and very likely will be going on for at least 20 a couple of more years.

As part of this program and as part of the pressurized thermal shock analysis, we have a Westinghouse report dated a couple of months ago in which a team of Westinghouse owners' group evaluated the presently developmental Westinghouse owners' group

1 emergency operating procedure guidelines, and that is 2 probably not the formal title, and concluded that in 3 fact they don't treat pressurized thermal shock 4 particularly well, and a substantial number of changes 5 were appropriate.

6 This report I certainly hope has been sent to 7 the Committee.

8 MR. BENDER: Steve, your observation leads me 9 to a direction which I hoped you would be able to 10 discuss some. The Robinson report was not very 11 comforting.

12 MR. HANAUER: No, sir.

13 MR. BENDER: It was an audit done very early 14 in this program, however. Are we in a position now to 15 say that we know what kind of training program the 16 operators need?

17 MR. HANAUER: Well, I will give you my 18 opinion, which is that the procedure guidelines, at 19 least the Westinghouse procedure guidelines, which are 20 the relevant ones for Robinson, are being changed in 21 guite a drastic way for Three Mile Island type reasons, 22 and that a few months ago the developmental revised 23 procedures were shown to need some more work regarding 24 pressurized thermal shock. That tells me, no, we don't 25 know all we should about pressurized thermal shock in

1 emergency operating procedures, and in fact the audit 2 team developed a very useful, I think, set of guidelines 3 about the things that should be done now in auditing 4 pressurized thermal shock procedures, and that these 5 guidelines can be found in Appendix -- Which one is it, 6 Jim? Do you remember? Of this report?

MR. CLIFFORD: Appendix C.

7

8 MR. HANAUER: Appendix C of this report 9 contains a discussion of what can be done now. The 10 right way to fix this for the long term is to get these 11 guidelines right for pressurized thermal shock and 12 everything else. You walk, you see, between overcooling 13 the vessel on one side and undercooling the core on the 14 other side, and that is one of the reasons why I don't 15 want a highly conservative pressurized thermal shock 16 design basis accident which impels the operator to 17 undercool the core and make us another kind of an 18 accident.

19 Your point is very well taken, in other words, 20 that we don't know some things about how to write these 21 procedures, and the training, of course, goes with the 22 procedures. We in our offices, the kinds of people we 23 have in a room, in our quiet offices, must solve the 24 pressurized thermal shock problem before and not give 25 contradictory instructions to the people on the night

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1 shift who have to make these decisions and operate the 2 plants.

3 Therefore, the audit teams have very properly 4 been rather modest in what they have recommended as 5 short-term changes.

6 MR. BENDER: Well, I don't think we can 7 explore this further today, but as a long-time proponent 8 of depressurization for a number of reasons, recognizing 9 that it can't hurt anything in the thermal shock 10 business, I was rather hopeful that at least that aspect 11 of things would have been developed better and soone<sup>-.</sup> 12 and I am not clear that we understand even what needs to 13 be done.

MR. HANAUER: It has not, and practically severy line or every page in the Westinghouse procedure review points out that for this, that, and the other requences the operators are told to repressurize to 8 2,000 psi.

19 MR. BENDER: Well, that is hardly reassuring, 20 but let's go on.

21 MR. HANAUER: All right. Now, at the present 22 time, we do not have the calculational facility. We 23 have all of the theory, but we simply haven't done the 24 code work to represent these various transients in terms 25 of critical RT NDT and thereby to take into account the

1 reality of the transients. We have been in the present
2 state of development constrained to use TF, beta, and
3 constant pressure to characterize all of these different
4 sequences.

(Slide.)

5

6 MR. HANAUER: When you do it you get these 7 results. If you will direct your attention first to the 8 dotted curve, this is the Westinghouse PRA expressed in 9 terms of TF. Now, in fact, the Westinghouse PRA used 10 TF, beta, and pressure, and so I am oversimplifying an 11 oversimplification in order to get it onto a 12 one-dimensional vu-graph, but this is the curve which is 13 obtained. You will notice that it has the same shape as 14 my first vu-graph that showed tails and so on, and that 15 shouldn't surprise anybody. It goes from very high 16 frequency above about 300 degrees to rather low -4

Now, the staff has not accepted every detail 19 of the May-June Westinghouse PRA. The staff has found a 20 number of sequences we believe were incorrectly 21 characterized, some overconservative, some 22 overoptimistic, and the staff has not agreed with some 23 of the Westinghouse frequencies and probabilities, and 24 so the staff has, and this is explained at some length 25 in the report and in Appendix G to the report, the staff

1 has devised a PRA which differs to some degree from the 2 Westinghouse PRA, and which is shown as the solid curve 3 here.

Now, neither of these has had the kind of man-years of work or the kind of peer review that this subject deserves, and both of these results must be reharacterized as preliminary in some ways. My own belief is that a great deal more of this work is justified. We have a research program in this area, and this the industry ought to work on this, too.

Moreover, we have only the Westinghouse find the set of the set of

20 21 22

23 24

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MR. SHEWMON: You've plotted the frequency of 2 what up there?

MR. HANAUER: This is the frequency of getting 4 a transient more severe than TF equal to this value. We 5 are back to TF, beta and pressure, and what I did, or 6 what we did was to take the dozens of different 7 sequences --

8 MR. SHEWMON: TF is fluid temperature? 9 MR. HANAUER: Yes, sir. Each sequence we 10 characterized in terms of TF, beta, pressure and 11 frequency, and this is a result plotted in TF space. 12 MR. BENDER: Steve, a separate aspect of the 13 same question has to do with the matter of how much 14 operator reaction is in those curves.

15 MR. HANAUER: There's a lot.

16 MR. BENDER: Westinghouse, as I recall it, set 17 up three time periods -- maybe there were more -- for 18 operator response and assigned some frequency of correct 19 action to each time period.

20 MR. HANAUER: Yes, sir.

21 MR. BENDER: Is there any judgment of whether 22 using those kinds of what amounts to arbitrary 23 evaluations of operator response has an effect on the 24 depiction up there? And are they important to the 25 argument?

MR. HANAUER: I can speak best to the staff analysis. The dominant events in the staff analysis do not depend very much on operator action. We evaluated the Westinghouse numbers. They seemed reasonable to us, but in the end in ours, -- I haven't undone the Westinghouse one enough to answer. But in ours, the operator action is not terribly important because the dominant event is the stagnant, small break loss of coolant accident and the operator can't do much about it.

10 In some of the others, the operator reactions 11 are important. I don't have an analysis that answers 12 your guestion in any guantitative way.

MR. ZUDANS: Just quickly to make sure that we are on the same wavelength. You said these curves represent the beta and p is constant. Did Westinghouse Gensider constant pressure when they did their PRA?

MR. HANAUER: Westinghouse did exactly what I MR. HANAUER: Westinghouse did exactly what I MR. HANAUER: Westinghouse did exactly what I Note: Second State State

Now, this can and should be improved, but has 23 not been at the present time.

24 MR. ZUDANS: I have a problem with this 25 concept of constant pressure.

MR. HANAUER: Of course. It is a gross
 2 over-simplification.

3 MR. BENDER: Well, it depends upon what 4 pressure you use.

5 MR. THEOFALOUS: It seems to me if you could 6 take this curve one step farther, a small step farther, 7 to give it in terms of critical RT NDT, it would be 8 extremely useful. And of course, that could help you 9 focus on exactly the kinds of sequences that are 10 important to look at. And one can dig in more detail 11 into those sequences.

MR. HANAUER: It could, indeed. That is a
13 piece of business that has to be addressed.

14MR. THEOFALOUS: You could use that chart to15 get from this kind of a plot to this plot down here.

16 MR. BENDER: But you have to become very plant 17 specific I think in order to do that.

18 MR. VAGINS: You have it in the following 19 curves.

20 MR. THEOFALOUS: Maybe you have it already. 21 MR. VAGINS: Within a range of some transients. 22 MR. HANAUER: Yes. At the moment we have this 23 stereotyping of the transient as an intermediate step. 24 You are quite right, we should develop a better method. 25 (Slide.)

I now show you three of the probabilistic vessel failures. You have had this described to you before. In two minutes, what Strosnider and his colleagues have done is taken essentially the same deterministic fracture mechanics model, as we discussed earlier, but instead of assigning conservative or restimated values for the parameters, they took frequency distributions of the carameters which were not well whown or which were subject to variation and calculated a large number of possible events in which these various provide the parameters.

13 The result was then they did this 10 or 14 more times for each case in a code that does this for 15 you, and the result is that some fraction of these 10 16 resulted in vessel failure and some fraction did not. 17 And from this was deduced in a simple way an estimate of 18 the probability of vessel failure, given this transient.

Now, the problem at the moment in doing what 20 you suggested a moment ago is that this code today is 21 set up with TF, beta and pressure. Next year we will 22 have something better. And I have three cross-plots of 23 this response surface, which are in the report and which 24 you have no doubt seen before.

25 Here it is with temperature as the abcissa.

1 Always the probability of failure is the ordinate, and 2 here, beta is the parameter. As you can see, these 3 curves are very steep in temperature. That is to say, a 4 factor of 10 change in probability is associated with a 5 very small number of degrees, like 10 or 20, change in 6 temperature. So the temperature is, indeed, a dominant 7 variable.

8 You also see that for large values of beta 9 there is very little difference, but as beta gets small 10 it makes a substantial difference and decreases 11 substantially the probability of vessel failure 12 calculated in this way.

13 Another cut of the same response surface is
14 shown here --

15 (Slide.)

16 -- in which the abcissa is pressure, and here 17 is an answer to your question now, in probability 18 space. Here is the probability of failure as a function 19 of pressure with a constant beta of .15, and now the 20 temperature, T final, is the parameter. And you see 21 that the slopes of these curves are not very large; that 22 a factor of 10 in failure probability is associated with 23 1000 psi or more. This is not exactly negligible but it 24 is not the very steep behavior that was shown in 25 temperature space.

(Slide.)

1

A third section or cross-plot of the same 2 3 surface is given here, in which we plot the beta 4 dependence, and not surprisingly for all large betas, 5 the dependence is very small. But as the betas become 6 smaller, the accidents become much less severe. So as 7 we knew already, but it is comforting to see it, as a 8 result for slow transients the thermal stresses are 9 small and the probability of vessel failure is small.

MR. THEOFALOUS: The guestion I was asking 10 11 before could be answered also in terms of these graphs 12 here. Do you have a way, -- if you knew that you were 13 interested in a distribution of this plot, do you have a 14 way of backing out which sequences are contributing to 15 that?

MR. HANAUER: Yes, but a fairly crude one, 16 17 which we can show very quickly in the next slide. Let 18 me show you an example.

(Slide.) 19

We have, in fact, made the calculation, 20 21 exemplified by this curve. This one has -- this one is 22 for the Westinghouse probabilistic analysis, and the 23 Strosnider, et al vessel failure analysis, coupled in 24 the way that I have described. And you see here the 25 contributions of various kinds of accidents. So yes, it

1 can be done. It is some work.

Now, yes sir? 2 MR. SHEWMON: Before you go with your 3 4 development I want to go back and finish your question. 5 I wanted to see the previous slide, but you can answer 6 the question here. 7 MR. HANAUER: Do you want the next previous 8 one? MR. SHEWMON: I wanted beta versus conditional 9 10 failure. We were talking earlier about heat transfer 11 coefficients of 300 or 1000. Is that with 300 or 1000? (Slide.) 12 MR. HANAUER: Three hundred. 13 MR. SHEWMON: And that, what, tends to flatten 14 15 it off then, when one gets the very high betas? MR. HANAUER: Well, it is a combination of the 16 17 300 and the conduction in the metal. MR. SHEWMON: Yes, but if you get -- I mean, 18 19 they are in series, so the conduction of the metal isn't 20 a disposal parameter. MR. HANAUER: That's correct. 21 MR. SHEWMON: And as you get the heat transfer 22 23 in the liquid slower, that ought to --MR. HANAUER: There's a curve in your report 24 25 where the heat transfer coefficient has a parameter

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1 which I didn't reproduce. It would be -- or it's in the 2 appendix, isn't it? Jack, maybe you can refer to it. 3 We have the surface cut in heat transfer space.

4 MR. SHEWMON: I would have taken a yes for an 5 answer.

MR. HANAUER: The answer is yes.

6

7

MR. STROSNIDER: It's Figure H-30.

8 MR. HANAUER: Figure H-30 has just that 9 dependency in it.

10 MR. ZUDANS: Was cladding included in these 11 calculations for both heat transfer and mechanical, or 12 neither, or some other combination?

MR. HANAUER: Heat transfer, yes. Mechanical,
14 no. The heat transfer of the cladding was included in
15 deciding to use 300. That includes the effect of the
16 cladding; it was lumped.

Now, in these calculations the stress due to Now, in these calculations the stress due to 18 the differential expansion of the cladding is not 19 included. We have done some more recent calculations, 20 but it is not included in this.

21 MR. ZUDANS: So if the 300 represents both the 22 film coefficient and the cladding, what was the film 23 coefficient in that combination?

24 MR. KLECKER: If one assumes water to metal 25 heat transfer coefficient of 300, the effect of heat 1 transfer coefficient is approximately 200. If you
2 assume roughly 500 to 1000, then the effect of heat
3 transfer is more like 300.

4 MR. ZUDANS: So this is not the effect of 5 coefficient of heat transfer and metal? The 300 was 6 assumed for the film coefficient and the metal 7 contribution was added to it?

8 MR. KLECKER: We have done that in our 9 deterministic calculations.

10 MR. STROSNIDER: Let me answer that. The 11 effective heat transfer coefficient was 300 which would 12 correlate to a film transfer coefficient of 600 to 1000.

13 MR. ZUDANS: So you never run any calculations 14 of film coefficient of 300?

15 MR. STROSNIDER: No.

16 MR. ZUDANS: Plus the conductivity in the 17 metal. So really, all of this conversation has been 18 misleading. That is not the film coefficient; it is the 19 600 to 1000, and that is guite a different story.

20 MR. SHEWMON: Well, let me ask, since another 21 factor of 2 in whatever they have called their transfer 22 coefficient, and all of a sudden it starts having an 23 order of magnitude change in the probability of the 24 accident. So I would be interested in -- it is your 25 Figure H-30, go look at it -- I would be interested in 1 hearing the heat transfer people comment on what they 2 think of a film transfer coefficient of 600 to 1000 by a 3 factor of 2 or 4.

MR. THEOFALOUS: Two or even three.

5 MR. BENDER: But how do you convert that into 6 the overall heat transfer coefficient? What I'm talking 7 about is if I cut the film coefficient in half, what 8 would be the overall heat transfer coefficient 9 equivalent to 300, when you are using a value of 600 to 10 1000?

11 MR. ZUDANS: That's a good point.

12 MR. THEOFALOUS: I have done that in the 13 little thing I gave you, and that is one I remember. I 14 was coming up with a best estimate, something like 200 15 for overall, 200 to 300 overall.

16 MR. BENDER: Well, it seems to me one of these 17 days you've got to look at that point. It is not a 18 one-to-one relationship, but it does have a big effect.

19 MR. SHEWMON: Steve, if you look at your 20 curve, it has between one and two orders of magnitude 21 difference in going from 300 to 150. So there is a 22 profound effect on the probability, if I might use that 23 word.

24 MR. ZUDANS: And it's not sure that this is 25 the film coefficient. Maybe this is combined.

MR. SHEWMON: But at least he is on a steep 2 part of the curve.

3 MR. BENDER: If I heard Jack Strosnider right,4 he was talking about the overall coefficient.

5 MR. ZUDANS: That's right. And that is 600 to 6 1000.

7 MR. BENDER: In Theo's number, the 300 might 8 be 200, and that might be an important difference.

MR. HANAUER: It might, indeed.

10 MR. BENDER: Carry on, Steve.

11 (Slide.)

9

MR. HANAUER: The results. I have two, one for the Westinghouse and one for the staff. The results are plotted as frequency per reactor year of cracking to the vessel without arrest. Now, arrest is in the for model. If the crack arrested, we didn't count it as a failure, and we included in our arrest model an upper shelf tough failure limit of 200 ksi square root of inch, so we didn't allow arrest with a K1 applied higher to than 200 ksi square root of inch.

So we don't show any arrest for cracks that 22 extend more than about halfway through the metal, if I 23 recall correctly. But crack arrest is now in here, and 24 when it says "crack extension, no arrest," it really 25 means crack extension with arrest calculated not to

1 occur.

Now then, here is the frequency per reactor year, and it is plotted in terms of the RT NDT at the surface of the vessel. So a vessel starts off at the beginning of life off the lefthand side of this diagram, and as the vessel ages its RT NDT creeps to the right in raccordance with the fluids and the properties of the material. And then, as the temperature gets in the interesting range, the probability of it failing per reactor year or frequency per reactor year goes up in accordance with this curve.

12 As you can see, --

MR. THEOFALOUS: Are you going to change?
MR. HANAUER: Soon.

MR. THEOFALOUS: Before you change, I was curious on the small break. Some small break LOCAs will result in loss of natural circulation, while some other not. And the difference in the behavior is yery different, drastically different. And I was wondering how do you assign relative probabilities to those small breaks that don't have natural circulation versus the ones that do? And which ones are you plotting here?

24 MR. HANAUER: I will tell you how we did it.
25 This is a plot of the Westinghouse analysis in which the

1 small break loss of coolant accident has a negligible 2 contribution because in their analysis, which included 3 the effects of warm pre-stressing, as ours did not, they 4 calculated that the small break loss of coolant 5 accidents would be arrested by warm pre-stress phenomena.

As you will see in the next slide, in ours the 7 small break LOCA is dominant. What we did was we 8 divided the spectrum of break sizes and selected for a 9 separate set of boxes the break size in which -- the 10 break size range in which stagnation would occur. We 11 calculated its frequency and its consequences separately 12 from the others, and they turn to to dominate.

MR. PENDER: Before you get off that, -MR. HANAUER: I have another one for the staff
PRA.

16 MR. BENDER: I just want to ask what pressure 17 is associated with this computation?

18 MR. HANAUER: Each sequence was evaluated in
19 this approximate way and characterized by a constant
20 pressure. They were different for different sequences.

21 MR. BENDER: But they are mostly elevated 22 pressures now?

23 MR. HANAUER: Well, the one that dominates the 24 small break LOCA that stagnates is -- we used a pressure 25 of 1000 psi, which is where we calculated the pressure 1 would hang up.

2 MR. ZUDANS: In determining this arrest or not 3 arrest curve, essentially the critical RT NDT at the 4 surface was the crack propagation through the thickness 5 followed, and the stress factor reduces, and the RT NDT 6 reduction taken into account?

MR. HANAUER: Yes, sir, that was done in some 8 detail for each calculation. The properties of the 9 material as a function of the irradiation, which is 10 different through the wall, and the temperature as the 11 temperature changes, the change in K1 as the crack 12 enlarges, and the change in the critical in the crack 13 initia - K and in the crack arrest K as a function of 14 tempe sure were all taken into account.

15 MR. BENDER: But the crack is always in the 16 worst place?

MR. HANAUER: This is all for longitudinal18 cracks.

19 MR. BENDER: Yes, I know.

20 NR. HANAUER: And there was a crack size 21 frequency distribution applied here. It wasn't assumed 22 that a crack of the correct size was always there for 23 this calculation.

24 MR. ZUDANS: The reason I asked the question 25 is when you discussed initiation of a crack you stated

1 the pressure effects are not greatly significant. Now 2 as you propagate in the wall the temperature stresses 3 disappear.

4 MR. HANAUER: Not in the timescale of these 5 calculations they don't.

6 MR. ZUDANS: Well, they go for minutes. The 7 heat transfer and temperature distribution get 8 stresses. In fact, thermal stresses, in fact, on the 9 outside are compressive.

10 MR. HANAUER: Yes.

MR. ZUDANS: So there is some point where there is no thermal stress contribution whatsoever, and the only friving force is pressure.

14 MR. HANAUER: We have one experiment where 15 thermal stresses alone drove a crack 95 percent through 16 the wall.

17 MR. SHEWMON: You have what?

18 MR. HANAUER: There is one of the HHST 19 experiments where the vessel was cooled with liquid 20 nitrogen on the inside, and thermal stresses drove a 21 crack about 95 percent through the wall. Which is what 22 was predicted by this model.

23 MR. ZUDANS: But that was --

24 MR. HANAUER: That was an extreme case. That 25 wasn't a pressurized thermal shock case. That was a

1 very severe thermal transient.

5

2 MR. ZUDANS: But here, -- well, --. 3 MR. SHEWMON: That was a long time where they 4 kept on doing something to it?

MR. HANAUER: Cooling it. No pressure.

6 MR. KLECKER: I was just going to comment on 7 the fact that you do, indeed, have compressive stresses 8 at external, but the fact that you have a stress 9 distribution puts a moment on the vessel, so even though 10 they were compressive without any crack being present, 11 the fracture mechanics takes into account the generation 12 of this moment.

13 MR. ZUDANS: In other words, if you compute it 14 correctly and remove the material on the crack that is 15 already propagated, the stress factor is not --

16 MR. BENDER: Well, we want to be very careful 17 about using the small experimental models as a basis for 18 evaluating.

19 MR. HANAUER: This one was six feet long and a 20 couple of feet in diameter, and six inches thick, as I 21 recall.

MR. BENDER: Well, I'm not going to try to 23 debate the experimental circumstances so much as to just 24 recognize that we don't understand the structural models 25 as well as we ought to. And while there are people that

1 calculate things, might be able to calculate the results
2 relating them, to the specific vessel that we are
3 talking about needs to be understood a lot better than I
4 understand it.

Go ahead, Steve.

(Slide.)

5

6

25

7 MR. HANAUER: The most significant curve is 8 the one -- to us at the present time -- is the one based 9 on the NRC analysis which differs from the Westinghouse 10 one in several important respects. But by far the most 11 important is the dominant feature of the dominant 12 contribution of the small break loss of coolant accident 13 in the range where it stagnates.

In the interesting range -- this is, in fact, 15 the dominant contributor, and it goes from about 250 in 16 the Westinghouse curve to about 205 in the staff's 17 curves.

As I said before, there are a substantial 19 number of youthful features of these curves, and the 20 methodology in some respects and the input data in some 21 respects are not matured to the point where one really 22 ought to believe these curves in the sense of deriving 23 regulatory requirements directly from them, and we do 24 not do so.

That is to say, we have not laid an ordinate

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1 here as some value of acceptable risk and read it over 2 to the curve and read out surface RT NDT that tells 3 whether these plants can run or not. We don't believe 4 that the methodology -- and goodness knows, enough 5 differences and difficulties in this methodology have 6 been discussed by you and us today to make my point I 7 think entirely adequately.

8 What this tells us is, first of all, the 9 slopes. The slopes are, in fact, a factor of 10 for 10 about 20 to 30 degrees change in RT NDT. And that tells 11 us that, in fact, within the limitations of this model, 12 the RT NDT of the vessel is, as we expected, a central 13 parameter in judging the acceptability of operation of 14 one of these embrittled vessels.

Now, at first site, this implies that a vessel
16 at 270 degrees is in big trouble, and that it implies a -4
17 failure probability of greater than 10 per reactor
18 year, and vessel failure makes my corns itch and gets a -4
19 lot of people itchy in a lot of places. And 10 , if
20 I really believed it, would be kind of an alarm signal.
21 This isn't true because of the conservatism in
22 selecting the value of the vessel to RT NDT to compare

23 with 270.

24 (Slide.)
25 Here I have plotted in a very crude way a

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1 frequency distribution of vessels that satisfy the 270
2 degree criterion. Whether this is actually the case is
3 not known, but I have used the picture provided by the
4 earlier discussion of the scatter of the data. This is
5 a curve for which two sigma was 60 degrees, which is
6 kind of a typical value for the plants which we were
7 talking about, and I have located the two-sigma point at
8 270 degrees. So this is the spectrum of the actual
9 properties of vessels which just hit the screening
10 criterion if vessel properties are normally distributed
11 and if two sigma is 60 degrees, so there is a kind of an
12 assumption leap here.

13 MR. SHEWMON: Would you explain if the small 14 break LOCA is the worst one you have come up with, 15 stagnation, I would be interested in hearing you go 16 through what is the scenario which gets us into trouble, 17 or what is assumable, since you differ by several orders 18 of magnitude from Westinghouse. There must be some 19 difference. The perception might be interesting.

MR. HANAUER: Yes. The accident occurs in the following way. There is a break in the primary system in which the leakage rate exceeds at high pressure the injection rate of the high pressure injection system. And in which the energy carrying out the break exceeds in the early part of the accident the decay heat which

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1 has to be removed.

The result is that the inventory of primary 2 3 fluid decreases because the outflow is greater than the 4 income. And the inventory decreases but the heat 5 generation means that the pressure doesn't go down. The 6 pressure is calculated for the case I've seen to hang up 7 at about 1000 psi. As the pressure decreases below the 8 shutoff head of the high pressure injection, the high 9 pressure injection comes on, the inventory continues to 10 decrease but there is finally a secular equilibrium 11 established. The pressure goes down to about 1000 psi, 12 the input from the HPI can make up the loss at some 13 lower pressure. The leakage rate goes down with 14 pressure and the pump injection rate goes up with 15 pressure, and an equilibrium is established at about 16 1000 psi.

But during this period, the level is too low 8 to support natural circulation. And so, the water going 9 in the cold leg -- there isn't any loop flow to mix up. 20 There isn't any significant flow from the steam 21 generator through the cold leg into the reactor vessel. 22 The only flow which is available is whatever churning 23 goes on from the heat input from the walls of the inlet 24 pipe, plus whatever mixing takes place. And here we 25 have reference to the criari tests.

MR. SHEWMON: So in that case you are cooling one part of the vessel badly and the other part isn't getting cooled?

4 MR. MrNAUER: Well, that depends upon what 5 goes on in the owncomer. If you have no activity in 6 the downcomer at all, you have a stripe of cold water 7 going down the downcomer which, depending on the vessel 8 and depending upon which downcomer you look at, either 9 does or doesn't have a weld close enough to get cold.

10 Now, that is one of the things that has to be 11 looked at plant specific. We've assumed that there is a 12 weld there. That's the scenario.

13 MR. THEOFALOUS: On this problem, I think that 14 you -- I think your temperature in the downcomer is 15 overly conservative. You are using probably -- you have 16 the cold leg as part of the downcomer, like you say, in 17 your report and I think this is just way, way, overly 18 conservative. And I have done myself some calculations 19 on that, and if you would like I could give you 20 numbers. I gave it to Ed yesterday.

21 MR. HANAUER: Well, if you gave them to Ed, 22 you gave them to me. And yes, this is subject to plenty 23 more calculational refinements.

24 MR. KOUTS: I think if you look at it
25 carefully you will probably find a number of other very

1 large conservatisms there. The heat transfer
2 coefficient under these circumstances is likely to be
3 much lower than you assume for other kinds of transients
4 that you've analyzed.

5 The probability distribution for the cracks, 6 which really have to take into account the probability 7 that a crack exists in a location, in a weld, which is 8 in the thermal stripe region.

9 MR. BENDER: Herb, could you use the mike?10 The reporter is having trouble hearing you.

MR. HANAUER: Yes, I think all of these are things which have to be taken into consideration and have not yet been.

14 MR. KOURS: In light of the steepness of the 15 curve with respect to heat transfer coefficient that was 16 just pointed out earlier, these will probably have a 17 profound effect on the thing which is having the largest 18 influence on the shape of your total curve.

19

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MR. HANAUER: Yes. Now, they do not have an enormous influence, because the next one comes in 20 degrees higher. And there are a number of contributors within 20 to 50 degrees.

5 MR. KOUTS: Well, I am looking at the 6 probability.

7 MR. HANAUER: Yes. These curves are steep. 8 If this curve were to disappear, the probability would 9 change by about a decade in this region. So, yes, as I 10 said, these things are not mature; they are still under 11 development.

MR. BENDER: Steve, to just get back to the 13 pressure question one more time. If the number was 1000 14 p.s.i., would that be because a break is limiting the 15 rate at which the pressure can decay?

MR. HANAUER: Yes, sir.

6

17 MR. BENDER: And that presupposes that an 18 operator does not do anything to change the pressure 19 from that level?

20 MR. HANAUER: That is correct.

21 MR. BENDER: Thank you.

MR. HANAUER: It is this kind of consideration 23 that led us to stay at 270 in spite of the fact that our 24 best notion of operating experience tells us that if -225 10 were a real number, we should go up above 300

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1 degrees somewhere.

2

(Slide.)

But it was the kinds of considerations in this 4 curve that told us for the present to stay at 270 rather 5 than switch.

Now, the amount of science in this conclusion 7 is not very large. Ther are large uncertainties in the 8 probabilistic evaluation. There are uncertainties we 9 have discussed in the inference from experience.

10 You can get more safety, more conservatism, by 11 decreasing the screening criterion. You can get a lower 12 level of safety, less conservation, by increasing the 13 screening criterion from 270. If you believe the slopes 14 of these curves, then a 30-degree change in the 15 screening criterion gives you about a factor of 10 in 16 the probability of wrecking plants due to pressurized 17 thermal shock.

18 MR. ZUDANS: One question. When the heat 19 transfer analysis was done with a staynant hot leg and a 20 certain amount of fluid coming in, was still the 21 assumption made that the entire surface of the reactor 22 vessel and the downcomer gets washed with that cold 23 fluid?

24 MR. HANAUER: Yes, sir.
25 MR. ZUDANS: That is not likely to happen, is

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1 it?

2 MR. HANAUER: No, it does not fit. We used 3 the available calculations of thermal hydraulics, and we 4 used the available reactor failure probability 5 calculations for which that incompatible assumption was 6 made.

MR. ZUDANS: So the thermal stresses then
8 computed were based on asymmetric configurations?
9 MR. HANAUER: Yes.

MR. ZUDANS: And that is not right either.
MR. HANAUER: That is correct. That is the
present state of our calculational ability.

MR. THEOFALOUS: Well, you found a lot of 14 reasons why you assumed the small break, and I want to 15 look at the second one. Is there anything in doubt 16 concerning the steam line breaks calculation?

17 MR. HANAUER: Of course.

18 MR. THEOFALOUS: But anything of substance?
19 MR. HANAUER: Of course. The small steam line
20 breaks turn out to be more serious than the big ones.
21 First of all, they have a much higher probability; and
22 secondly --

23 MR. THEOFALOUS: But those are reflected in 24 here. I am saying, is there anything which puts the 25 line into doubt -- this line, which already reflects the

1 different sizes and so on -- is there something in the 2 methodology is what I am asking? A heat transfer 3 coefficient or what have you?

4 MR. SHEWMON: That is why we are paying you 5 this exorbitant fee to come here and help us with that.

(Laughter.)

6

7 MR. HANAUER: The answer is that many of the 8 same models were used; in particular, the reactor vessel 9 failure model was identical. Of course, now you have 10 either forced circulation or natural circulation, so the 11 heat transfer coefficient and the mixing in the 12 downcomer is more likely to be realistic.

13 It turns out that the worst steam line break 14 is a small break which occurs at hot standby, rather 15 than in operation, because you do not have the power 16 generation to heat things up. But that has a lower 17 probability. That is all in this curve, and all of the 18 numbers are subject to discussion. What is the 19 probability of a large small steam line, a small steam 20 line break, a bypass valve opening, which is a steam 21 line break; all of that stuff.

MR. THEOFALOUS: So the interesting question as how does one proceed from here? If we wanted, for a example, to take advantage of what Professor Shewmon has said, and we wanted to look at the probability of

-5 1 10 , and I want to know what steam line break and 2 what particular scenario gave you that point, can I get 3 that point from somebody?

4 MR. HANAUER: Yes. It is discussed briefly in 5 the report. And we have some more information.

6 MR. THEOFALOUS: I do not think you have this 7 kind of information in the report. I looked at the 8 report.

MR. HANAUER: Look in Appendix G.

9

10 MR. BENDER: Steve, separately from Theo's 11 comments about the point, is the matter of how much we 12 understand the heat transfer, heat transport behavior, 13 of the steam generator as a whole, which seems to me to 14 have a big influence on steam line break behavior?

MR. HANAUER: For large steam line breaks, MR. HANAUER: For large steam line breaks, for there is a lot of uncertainty because the steam generator is far outside its normal operating sconditions. For small steam line breaks, remember small steam line breaks are not necessarily rending metal, they are bypass valves open or relief valves open or something like that.

The steam generator is operating near its normal mode, and that is not a large uncertainty. MR. EENDER: Well, maybe not, but I would like to know more about it.

1 MR. HANAUER: There is a limiting return 2 here. You would not want to pay too much or delineate 3 too elegantly the heat generator elements of this curve. 4 if you are imprisoned in the reactor failure probability 5 calculations with the many uncertainties that are 6 involved there.

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7 MR. BENDER: Well, I agree with that. And 8 maybe we would be working too hard under the tail. But 9 a lot depends upon how much feedwater is in the steam 10 generator, particularly under shutdown conditions and 11 what its temperature is and what is being done to 12 control it.

13 MR. HANAUER: You can be more elegant in this 14 area by picking more scenarios, chopping up your 15 probabilities, and considering many different branch 16 points in your event tree and analyzing each one. This, 17 to the extent that the models are available, this is 18 only the use of resources to do this.

19 MR. BENDER: Paul, did you have another 20 guestion?

21 MR. SHEWMON: No.

22 MR. BENDER: How near are you, Steve, to being 23 at the end of your harassment?

24 (Laughter.)

25

MR. HANAUER: I would say with a typical

1 guestion density somewhere between 30 and 50 minutes.

2 MR. BENDER: Well, carry on. We will try to 3 hold down the question density.

4 NR. HANAVES: I do not learn anything if you 5 do not ask guestions.

6 MR. BENDER: I know. But we are the 7 absorbers, not you.

8 (Slide.)

9 MR. HANAUER: The next thing to do is to 10 compare these numbers with the safety goal. This turns 11 out to be extremely difficult to do, not suprisingly. 12 The safety goal is in terms of coremelt and in terms of 13 public risk. And so we have to get from the frequency 14 or probability of vessel cracks, which is what we have 15 been working on, to the probability that cores melt and 16 the probability that the public is at risk.

I have expressed these as two unknown
Quantities X and Y, those being what you do with unknown
Quantities. The discussion in the report that you have
has misled almost everybody, and I have therefore
completely rewritten in the next edition of the report,
which you will receive in the not-too-distant future.
X and Y are not known. They are both less
than 1. X is the probability that the core melts if the
vessel cracks. Not every vessel crack melts the core.

1 It depends upon the size of the crack compared to the 2 size of the replenishing capability and on the location 3 of the crack, whether the core drains or whether one 4 can, in fact, continue to fill the vessel to some 5 reasonable level.

6 And it depends also on the heat transfer 7 characteristics of a core which is partly covered with 8 water and which is old to some extent by the various 9 loss-of-coolant accident experiments, but about which 10 there is a great deal more to be known.

Now, what I have done is to write down how you
12 compare this kind of calculation with the safety goal.
13 You take the safety goal guideline of 10 . You do
14 not want to spend it all on pressurized thermal shock.
15 And so I took a tenth of it, an arbitrary fraction. And
16 I said, we are okay with the safety goal if X times F is
17 less than or equal to 10 .

18 Well, the numbers you get for F are in the -6 -5 19 range 10 , 10 , if you believe these calculations 20 for a vessel, at 270.

21 (Slide.)

Now, for most of the vessels, the F is a very small number for vessels below 200, which is a lot of them. F is a very small number, and there is no safety goal problem at all.

But let us take a 270-degree vessel, and I 1 2 have suggested to you that this line characterizes the 3 population of 270-degree vessels, and maybe half of them 4 -- well, they are in the range, very small to 10 , 5 10 ; and some of them are much higher in an unknown 6 proportion.

I have not done any calculation, but only 7 a drawn this curve and waved my arms.

(Slide.)

9 -6 If F is in the 10 to 10 range, 10 11 everything is just beautiful. For some fraction of 12 270-degree vessels, F will be in the 10 range. And 13 for those fraction of the vessels, we probably do not 14 meet the coremelt criteria.

Now, this fraction of vessels is fairly 15 16 small. There is a nice intellectual problem here which 17 I do not know how to address. Here is a vessel which is 18 calculated to be 270 by our formula. The probability of 19 its actual value is either on this curve or on some 20 other curve that we do not know. I do not know how to 21 put that into safety goal language.

But surely the fact that most such vessels are 22 -5 23 down in the 10 range has to be taken into account in 24 looking at the safety goal. This is a question of 25 application of the safety goal that deserves a lot of

1 attention and has not had it. I do not know how to go 2 from there.

3 Similarly, with public risk, it is simply that 4 XF x Y, the probability that a lot of stuff gets out if 5 you have one of these coremelts must be less than some -8 6 number like 5 x 10 . Now, that number has a whole 7 bunch of assumptions in it about meteorology and 8 population and stuff that is some kind of an average 9 number. Again, we do not know why for longitudinal 10 cracks that produce orderly coremelts, Y is probably a 11 pretty small number. At Indian Point Y is less than -2 12 10 for such things.

13 If you get the crack that goes all the way 14 around and you get a jet-propelled top half of the 15 reactor going up, we have a calculation that says there 16 is just about enough stuff to restrain it, it maybe will 17 and maybe will not come apart and fly up. And whether 18 it has enough energy if it flies up to significantly 19 damage the containment so a lot of stuff gets out is not 20 clear because there is not a lot of stuff when this 21 happens; the core melts forthwith but not instantly.

And we do not have analyses like this. This as sequence has not been analyzed, but I can turn the -5 24 problem around. I can say, if F is 10, then 25 coremelt is okay and risk will be okay if Y is less than

1 5 x 10 . And those sound like reasonable numbers,2 but I have no science behind them.

3 So the comparison with the safety yoal is not 4 very satisfactory. It seems like we are not wildly out 5 of line, but we do not have enough science and enough 6 calculations today to make a quantitative check. Why? 7 Because we do not have PRAs in which vessel failures of 8 this kind have been calculated in any significant detail.

9 MR. BENDER: And if you had, you could not 10 believe them.

11 MR. HANAUER: They would have whatever degree 12 of belief was appropriate. We are having some trouble 13 believing the vessel crack calculations. They need more 14 work. I do not know whether you believe vessel failure 15 coremelt calculations or not. I have not seen any.

16 (Slide.)

-2

Now, then in section 8.7 or thereabouts, we have spent a good bit of time on the uncertainties. By the way, section 8.7 has a few statements that are not exactly right, and they have been rewritten, too. But, in fact, there are -- I do not need to dwell on any totay -- a very substantial number of uncertainties in all of this.

24 (Slide.)
25 Now, the conclusions we draw, let me now

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1 emphasize that these are the Staff's conclusions. And 2 they are being submitted to Mr. Denton within a week, to 3 Mr. Stello and to Mr. Dircks probably within a few 4 weeks, to the Commission probably in November. So that 5 what you hear is what Steve Hanauer and his colleagues 6 think and not what the management of the NRC Staff 7 thinks, and certainly not what the Commission thinks. 8 And what the ACRS thinks would be a very important part 9 about this decision process.

What we now think is that 270 is about right for the present, that the situation is that if 270 is about right, that there is no need for immediate action a on any plants, but that within the next small number of years these methods must be refined; and that we will need plant-specific analyses on the top few plants in that list which are getting embrittled into the high 200s; and that what needs to be developed -- and this is the biggest hole in everything I have told you today -what needs to be developed is given a plant-specific analysis, which is described in the detail in Chapter 9 to four report and which I have a decorate on, we then have to decide what is acceptable when we get such a plant analysis.

And that, gentlemen, is the largest hole in 25 our present work. We have not, since we have gone away

1 from an RT NDT or a single-probability safety goal 2 style, we have yet to develop the critical question of 3 what is accepted as these plants continue to embrittle.

Now, it is my opinion that the plants in the high brittle range, in the high 200s, should initiate steps to slow down their embrittlement and steps to decrease the risk from the highest risk contributors which, if it continues to be the small-break LOCA, is perhaps most easily done by warming up the emergency core cooling water. It is rather easy to get 50 degrees to out of that with essentially no problems as far as we know.

And finally, since we did not pick some And finally, since we did not pick some design-basis accidents and some evaluation models, it is not clear that some of our older regulations are compatible with what I have told you today and what we for propose to do. This is the question that the legal beagles are now working on.

Now, what I wanted to do is to talk some more 20 about the plant-specific analysis. And I wish I knew 21 how to talk some more about the acceptance criteria. 22 But I really do not.

23 (Slide.)

24 The plant-specific analysis, we believe, 25 should include these factors. And you will observe,

1 among other things, the operating procedures and 2 training program improvements which need to be done in 3 the fairly short term in some plants, but which need to 4 have a major improvement in connection with the I.C.1 5 TMI-procedure-based improvement.

6 What we think we should from these plants is a 7 much better look at transients and at the vessel. You 8 do a better look at transients by doing plant-specific 9 and, in a way, that encompasses some of these questions 10 that have been discussed today, a study of the 11 overcooling transients which dominate the risk in that 12 particular plant, using the experience of that plant and 13 similar plants as well as the generic experience of all 14 plants, which is all we have done, using the plant 15 configuration and the plant sizes and the plant behavior 16 of that particular plant.

We propose this to be done not in 100 plants, We propose this to be done not in 100 plants, Note that in a small number of plants that have brittle yessels. Similarly, we propose that in such plants, as 20 good a look as can be obtained of the properties of that 21 yessel and of the present state of that particular 22 yessel, should be obtained.

Now, you have scheduled a discussion of 24 nondestructive testing. So I will only remark that the 25 code-required in-service inspection is not well directed

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1 toward pressurized thermal shock cracks, but that 2 methods are under development and have been developed 3 that can do a lot better job of detecting pressurized 4 thermal shock-type cracks, and chat in these vessels 5 there is an obvious place for application of these.

6 Furthermore, what one has to do then is to 7 figure out what to do with the results. When we do 8 these probability curves, in general, we have a crack 9 probability distribution. If you do a good in-service 10 inspection and you find this and that or nothing, then 11 this ought to change for that vessel the crack 12 probability distribution. That is an area where we have 13 not done anything except wave our arms, but clearly it 14 is something that we should do.

15 And then we need to consider flux reduction 16 plant modifications. Your favorite, automatic 17 depressurization, is here, Mr. Chairman. And 18 operating. And finally, for the most brittle vessels, 19 in situ annealing and the basis for continued operation 20 must be considered.

21 We have for annealing an EPRI report. There 22 is a thin report on the feasibility of annealing, and I 23 just got a wheelbarrow-size report with 2800 pages on 24 the metallurgical data that underly the annealing 25 process. And so a fair amount is known about what you

1 can do with annealing, and I will suggest that very 2 little is known on whether annealing is actually a 3 practical possibility. But this report is available to 4 you as well as to me.

(Slide.)

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In the longer term, we think that some generic things ought to be done, too -- the longer-term, meaning not this summer and this fall -- but we think that this p. Sedure program that we have discussed at some length and the training that goes with it are really very in important and procedures are not now well cognizant of pressurized thermal shock and need to be in a connected and integrated way so that we do not foul up the plants in some other way in trying to cope with pressurized thermal shock.

We think that the generic analyses that I We think that the generic analyses that I Presented here have a very large number of holes in it. The number of holes is somewhat larger than when I brought it in this morning at 9:00 o'clock, and that these topics need to be investigated and we need to have these topics need to be investigated and we need to have a better generic idea of what is going on, particularly for the Bs and the Cs, because our present analyses is a essentially a Westinghouse analysis.

We need to improve the in-service inspection. 25 We need to decrease the leakage neutron flux, and we

1 need to do these plant-specific analyses.

Now, that is our proposed program. And to the sextent that a single discussion of this length can cover 4 it, I have done my best to try to connect it. It should be clear that this is a problem that embraces many 6 different disciplines.

7 And one of the most difficult things in coping 8 with it over the past year has been to make sure all of 9 the disciplines were involved and to avoid going off and 10 working very hard on one particular piece to the 11 detriment of other parts.

I give you one example: the heat transfer 13 coefficient is obviously an important point both as 14 regards how we do our thermal hydraulic analysis and as 15 regards how we do our vessel deterministic and 16 probabilistic failure analysis.

At some point, the heat transfer coefficient 18 is known well enough so that the other uncertainties 19 will dominate, and we ought not to do for pressurized 20 thermal shock a lot more work than that in the heat 21 transfer coefficient. If you let yourself think too 22 much along these lines, you induce paralysis. And so we 23 have tried to walk the curve between this.

24 This is the end of my prepared discussion. I 25 will be glad to answer any other questions, and call on

1 my colleagues for things I do not know.

2 MR. BENDER: Well, let me say I will entertain 3 a couple of questions and then we will break for lunch 4 and decide whether we want more when we come back.

5 Does anyone want to pose a guestion? 6 (Pause.)

7 Steve, an observation and not a question. It 8 seems to me that you have come a long way in developing 9 the screening concept, assuming you get the minor 10 disagreements straightened out. It does seem to me that 11 the second step, which requires plants to respond to the 12 screening criteria when a plact gets to the point where 13 it requires some action, is probably not the best way to 14 deal with it.

15 MR. HANAUER: Well, we have proposed that 16 plants for which the screening criterion is predicted in 17 3 years be treated so that there is plenty of time to 18 decide what to do about the plants.

19 MR. BENDER: I see. Okay.

20 Bill.

21 MR. BOCK: It seems that the important thing 22 you are really looking for our opinion on right now is 23 do we agree with the screening criteria, or, if not, 24 What else should we do? And whether or not we agree 25 with the screening criteria depends to a considerable

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1 extent on what happens when you reach it.

If it simply becomes a level at which point the plant should exhibit some increased concern over the PTS problem, we might have one opinion. But if it were something that when you reached it, you would trigger off a chain of events which would eventually require you to anneal the vessel or do some other drastic modification, our opinion about that might be different.

9 I appreciate the problems in establishing a 10 position. But can you give us anything better to go on 11 as to what you do when you reach the screening limit?

12 MR. HANAUER: Let me describe our present 13 status, as the start of an answer, and to say that I 14 think my own opinion is where we need your advice, you, 15 of course, give whatever advice you think appropriate.

I would suggest that we need your advice in the following areas: First of all, is our conclusion that no immediate action is needed acceptable? Do you believe it is correct? You did 6 months ago. You wrote the Commission in that vein. And have we learned anything different, or is this still the correct conclusion in the committee's opinion? That is kind of a threshold thing, that we really do solicit advice on.

24 Secondly, is the screening scheme appropriate, 25 and is the screening value about right? And, of course,

1 Mr. Bock is correct. The guestion that follows
2 immediately is: is our proposal, to the extent that it
3 is delineated, for what plants should do when they
4 trigger the screening criterion appropriate?

Now, where we really need some advice and where we have not made a proposal is what should be the r criteria for operation or shutdown of a reactor whose wessel is substantially emprittled? And to pick a sample, I will simply say that a vessel which reaches, according to cur formula, 270 degrees must make a showing that operation of this plant is acceptable.

Now, there are two general categories of 13 things. One is a general sharpening of the pencil to 14 show that, in fact, if you really look hard at this 15 vessel, it is not a 270 degrees the way you think it is 16 at some lower value. That is one category of responses.

Another category of responses is that because 18 of the way this plant is configured, even though this 19 vessel is at 270 degrees in this conservative way, that 20 the risk of pressurized thermal shock is acceptably 21 low. That is also a sharpening of the pencil, but in a 22 somewhat different area.

23 The third thing to do is to improve the safety 24 of the plant by procedural and hardware changes that 25 make the risk acceptable.

Now, what I have skirted all around is what is the acceptability of a plant with a substantially embrittled vessel? About this we really are only at the beginning of our consideration.

5 You are quite right, Mr. Bock, we have not 6 adequately done this, because we were working along 7 toward an acceptability criterion that turned into a 8 screening criterion about 2 or 3 months ago.

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1 Any advice the subcomittee wishes to give us 2 would be very welcome. I will tell you some early ideas 3 I have on the subject. If, as I expect, the Commission 4 proceeds with some ideas about safety goals and value 5 impact justifications for backfits, we will be, when 6 these things come due in a small number of years, 7 working in probability space. And we will be trying to 8 develop perhaps the first probabilistic acceptance 9 criteria, or perhaps we will use some fairly generic 10 based upon a few plant-specifics to develop 11 deterministic acceptance criteria.

I hope and expect that we will not go back to I a set of design basis accidents, highly conservative evaluation models and highly fanciful acceptance for criteria, the way we have now in emergency core for cooling. That is not an answer. I don't a good answer.

17 MR. SHEWMON: Let me make on comment on this. 18 I feel rather comfortable with your 270 and 300 numbers, 19 not because I feel I know what is going to happen there 20 or exactly what you should do, but I feel that by the 21 time the vessels get up there it is fully appropriate 22 that people be looking very seriously at it. And I'm 23 sure the utilities will look at it maybe before they 24 even get there and decide that they would like to slow 25 down. And I think I feel relatively comfortable with it.

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1 MR. BENDER: I think there's a point to be 2 made here that goes like this. Somehow or another 3 people think that the NRC has to establish some 4 regulatory action process associated with the point 5 where the screening criteria require some action. The 6 owners own the plants and they have a responsibility, 7 and my inclination is to say that the screening criteria 8 probably show -- if you accept the evidence so far --9 that there is time to do something.

But the initiative is clearly in the owners' 11 camp, and every owner that might find some vulnerability 12 to this thing ought to be thinking about his strategy. 13 Why should the NRC be inventing a strategy for him?

14 Can we break for lunch on that note? And we 15 will reconvene at 1:25.

16 (Whereupon, at 12:25 p.m., the meeting was 17 recessed for lunch, to reconvene at 1:25 p.m. the same 18 day.)

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## AFTERNOON SESSION

(1:30 p.m.)

MR. BENDER: Let's reconvene. I think before proceeding with the presentation on PNL, I would like to find out if there is anything else on Dr. Hanauer's presentation, and if so, we will cover them now. Does ranyone have any additional guestions to pose to Steve?

8 (No response.)

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9 If not, let me --

10 MR. ZUDANS: Mr. Chairman, I would like to 11 raise a question. I'm sure there's no answer for it. 12 Has anyone during this year in the process attempted to 13 precisely identify where concerns exist in this 14 process? You know, you use certain linear fracture 15 mechanics analysis and they're associated with some form 16 of surface. Temperatures were used, a fuel coefficient 17 was used, a whole slew of things.

18 MR. HANAUER: There have been various lists.
19 There is one in Section 8.7 of the report. I have no
20 big, long list and we have no prioritized list.
21 MR. SHEWMON: There has been a sensitivity
22 study.

23 MR. ZUDANS: We, of course, mentioned here
24 this is a concern and that is a concern, but a
25 comprehensive list of everyplace where the whole group

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1 thinks that the issues result in a conservative factor.
2 That would be interesting to see.

3 MR. HANAUER: It would, indeed. There are, of 4 course, some non-conservative factors which have to be 5 included.

6 MR. BENDER: Let us leave that as food for 7 thought. I would like to suggest that the working group 8 think during the next hour or so about how it views the 9 proposed screening criteria. Because one of the things 10 I think we will have to respond to is whether we think 11 this approach is a good one.

12 And secondly, I suggest we ought to think 13 about what other kind of recommendations we might make 14 to the Regulatory Commission, reminding ourselves of the 15 original recommendation or the original request which 16 Chairman Palladino made to us, which was to provide any 17 input we could to the staff in time so they could be 18 included in their proposed regulatory effort which would 19 be presented to the Commission. So I will leave you 20 with that opportunity to think.

21 MR. AXTMANN: I do have a question for Dr. 22 Hanauer. How far has the staff gotten into the flux 23 management program?

24 MR. HANAUER: We studied it quite a bit. We 25 have had a contractor do some work for us on it. There

1 is a short summary of this in the report and a longer
2 summary of this in one of the appendices, and there are
3 some technical reports if you would like to see them.

4 MR. AXIMANN: Have the economic aspects been 5 explored very much?

6 MR. HANAUER: Well, we have done very little 7 on that except to write down what people have told us. 8 We don't feel that is really within our purview.

9 MR. BENDER: I think the next item on the 10 agenda was a presentation by PNL on their review of what 11 is known about the pressurized thermal shock issue. Mr. 12 Peterson will be the initial speaker, and I will leave 13 it up to you to introduce the rest of your gang.

14 MR. PEDERSON: Steve is a very tough act to15 follow, so I brought along guite a bit of help.

16 (Slide.)

I am Les Peterson and I will start out with a summary of NUREG-2837, which is the PNL's technical review of the PTS issues, which has now been distributed and only initially submitted in June, and it was issued by the NRC in July. I will also talk briefly about PTS screening criteria, and then Shaw Bian will talk about sevents in the thermal and the thermal hydraulic issues. devents in the talk about material properties. Fred Simonen will talk about fracture mechanics issues, and

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1 he also will speak some about the actual NDE or 2 in-service inspection and what gains are possible 3 through that. And then on the end there, Tom Taylor 4 will talk about the NDE methodology and pplications to 5 in-service inspection.

(Slide.)

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7 We were asked by the NRC to review the PTS and 8 particularly in the near term to come up with a 9 regulatory position for them. And the source of our 10 information was the 50, 100 and 150-day responses from 11 the licensees, the owners' group submittals and 12 supporting ongoing research at the various laboratories 13 and EPRI and also, consultants that we had onboard that 14 reviewed the material and made comments and 15 suggestions. And I wrote the consultants on this copy 16 and the areas that they were particularly involved with. 17 (Slide.)

18 MR. BENDER: Mr. Peterson, it would help a 19 little bit if when you're talking if you'd stand back 20 from the slide.

21 MR. PEDERSON: In our NUREG-2837, there were 22 three main categories of recommendations that we came \_, 23 with. Initially, we found from our judgment that there 24 was an immediate problem with any of the present plants, 25 but from the reviews that were made by the NRC people

1 and also some of PNL people at the plants reviewing 2 procedures and training and so forth, it seemed quite 3 obvious that there were upgrades in procedures and 4 training and some control room instrumentation that was 5 needed on a near to longer-term basis.

6 Our report gets into more details there on our 7 recommendations for the near term and for the 8 intermediate term and the longer-term periods as far as 9 which procedures and which instruments and so forth 10 should be reviewed on a site-specific basis for 11 upgrading.

12 Secondly, from the analyses that were 13 submitted on the 150-day, they were quite different, and 14 some of them had some deficiencies as far as being 15 accurate or totally acceptable or covering the total 16 problem. And so, we developed some criteria to be used 17 for figuring effective full power years remaining before 18 further corrective actions would be required.

19 And I think these might be particularly useful 20 in the site-specific analysis that will be required when 21 various reactors are triggered by the screening criteria.

And lastly, we have recommended improved NDE And lastly, we have recommended improved NDE techniques for in-service inspection, and Tom Taylor, of verse, will talk about that further.

25 (Slide.)

Now, the screening criterion, of course, as Steve mentioned this morning, was for axial welds, 270 degrees F, and for the circumferential welds, 300 degrees F, and we searched guite diligently for a basis -2 for that. Initially it started out looking at 10 for frequency because there was -- looking at a number of them, why, when you use that you get a probability of -6 8 crack extension of about 10

9 That has changed some, and now the basis of -210 that 270 is a little larger than 10 . But the crack -611 extension at 10 , as Steve mentioned, is very 12 difficult. The probabilities are not something that you 13 would want to rely on for regulatory policy, but it is 14 probably the best we have, and the safety goals that are 15 in the comment stage, of course, can be related to about -5 -616 a 10 or .

17 Also, the report on the integrity of reactor 18 vessels for lightwater reactors that the ACRS issued in 19 January of 1974 also used a 10 and 10 value, so 20 that seems like a pretty good base. But we have to 21 learn how to really apply it. And I have got to admit 22 that we are some distance from that yet.

23 (Slide.)

24 This is one of the earlier curves that Steve 25 showed earlier, and it just shows how at 270 you have a

1 frequency of six or seven to the 10 or

-2

-3

## (Slide.)

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Setting into this particular slide, which I 3 4 think may have changed a little but I think it is 5 basically the same slide, and I apologize for the 6 reproduction that didn't come out very good. But as we 7 were told not to do -- and I recognize why we shouldn't, 8 because of not having a real good or not having a good 9 handle on these curves, and I'm sure they're going to 10 shift a lot and they will shift even more when people 11 look at it on a site-specific basis. But looking at the 270, you come out to about 12 13 two times -4, which even with a couple of orders of magnitude of 14 10 unknowns or uncertainty as far as where that is, you still 15 are at least a little hesitant to see it up that high in 16 probability. That is, of course, the NRC staff's curves. 17 (Slide.) 18 On Westinghouse curves, it looks better, but 19 20 it is still -- you still have the probability in the 21 10 and 10 range. (Slide.) 22 There was one other curve that was in an 23 24 earlier rendition that now hasn't been used, but I think 25 it says the same thing. This is operating history and

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1 the same type of probabilistic analysis, and using that, -4
2 we would get about 10 or pretty close to what the
3 NRC staff's calculations are on a PRA basis.

(Slide.)

5 So what we asked ourselves is -- excuse me, 6 I'm missing one slide. I guess you will have to look on 7 your handout. The thing we asked was how was -6 8 probability of a crack of 10 satisfied, considering 9 those type of data points that we get. And in the NRC 10 staff evaluation of September 13, on page 8.6, it says, 11 and T will read it, "PTS event sequences leading to 12 reactor vessel failure have overall frequency F per 13 reactor year. Figures 8.2 and 8.3 which were the two 14 curves provide an estimate of F. A plant evaluated as 15 described in Sections 5 or 9 and Appendix E to be at the 16 270 degrees screening criteria is likely to have a true 17 RT NDT of 150 to 270. Now, that is based upon the two 18 sigma.

19 Then, for a mean of 210 -- in other words, a 20 mean reference temperature of those reactors would then 21 be 210, and of course, the frequency would be about 22 10 per reactor year of the NRC curve, and much 23 smaller on the Westinghouse or owners group curve.

24 (Slide.)

25 Looking at those again, we are using the mean

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1 value of 210, and you see you would be down here in the 2 -5 to -10 frequency for a crack extension on the staff 3 PRA curve, by using the Westinghouse curve. Of course, 4 you are off of the scale. In other words, quite a bit -6 5 lower than 10, or here again, using the curve from -6 6 the operating history, you again are in the 10, 7 10 range.

8 So I guess I look at this and I think for a 9 screening criterion, the PNL people felt that the 270 10 was a good value considering the two sigma conservatism 11 that was talked about. And primarily because of the 12 probability and all of a failure being that low, which 13 is in the range you would hope to have it.

14 Also, you need some criterion for the 15 licensees to come back and show that their procedures, 16 training design fixes and so forth have improved the 17 safety factor to really gain on their reference 18 temperature. So I suggest that that probably is the 19 base that they need to work to.

20 Shaw Bian will now talk about the events in 21 thermal hydraulics.

MR. ZUDANS: Could I ask a question? I still 23 have some question relative to the frequency of 24 operating history. As I understand, there were three 25 cases in B&W and four to five cases in Westinghouse.

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1 What would those statistics look like if you did not mix 2 the cases? It makes a lot of sense not to mix them 3 because they are completely different reactors. Would 4 the B&W case be much more serious in terms of the 5 statistics?

6 MR. PEDERSON: It would certain vary the 7 statistics, but of course, there just isn't enough 8 information to really do that and have enough left for a 9 generic basis.

10 MR. ZUDANS: In either case, eight is not 11 enough for a generic basis and three is worse, and five 12 is just as bad. But you see, if you mix apples and 13 oranges, your overall picture might look better than it 14 really is. Say for a class of reactors such as B&W, 15 what would that curve look like for the B&Ws?

16 MR. PEDERSON: I agree it certainly would be 17 different, and I am sure on a plant-specific basis, this 18 point will be treated by the licensees. In BEW's case I 19 am sure they will point out that there have been a lot 20 of retrofitting where they have made design fractions to 21 the instrumentation system which was guite often to 22 blame. And that things are improving.

23 MR. ZUDANS: I see. That may have invalidated 24 the entire portion of the B&W effort.

25 MR. PEDERSON: It very well could be. There

1 is certainly a lot, as Steve mentions, that he wouldn't
2 want to use any of that probability for regulatory, and
3 a lot of this is the very reason he wouldn't want to.

4 On the other hand, it may be the best we have 5 at this time.

6 MR. ZUDANS: It's really not right to say the 7 best we have. I think it is right to say we have 8 nothing at this time in terms of basis for statistics, 9 but it does not stop is from using the statistics to get 10 the sensitivities, and that is all right.

MR. PEDERSON: Well, we need to certainly 12 improve on those statistics that we have.

MR. BENDER: We don't want to do it by having
more PTS events. We need to work on the methodology.
Can we proceed with the rest of the presentation?

16 MR. BIAN: My name is Shaw Bian from PNL. I 17 am more involved in thermal hydraulics than the events, 18 but I'm going to cover the area that is mainly done by 19 another person on the initiating events in the area of 20 PRA, as we are talking about just in the last few 21 seconds in the original NEC report.

They derive the probability of, say, a steam Ine break or a small steam line break based on some extrapolated boundaries from the primary side breaks. What was done was that some data on the primary side

1 part piping breaks were taken and then were extrapolated 2 based upon how many times longer of the steam line pipe 3 compared to the primary piping could come up with a new 4 probability because the length of the pipe is longer and 5 so forth.

6 And you may have a lot of uncertainty on that 7 because of certain events and welds, and also, the flow 8 rate of steam is much higher than the primary coolant. 9 So based upon the straight linear extrapolation of the 10 probabilities, there is guite a bit of uncertainty 11 involved in that area.

So we said we think that some more work based 13 upon the probability of the break locations, instead of 14 how long the length of the pipe should be, and with that 15 kind of approach the result probably is more acceptable.

And the second item on the initiating events 17 is the operation reaction time. In the fraft of the 18 staff report there was a discussion about the time 19 allowed for the operator to do certain actions, and we 20 found that there was a lack of discussion on the minimum 21 time required for the operator to take certain actions.

For example, from the ANSI standard, N660, we 23 found that general criteria for the operator action is 24 that a minimum of six minutes should be allowed for the 25 operator to start any action and then for each

1 distinctive operation of the control component, one more 2 minute should be allowed. And in one of the submittals 3 by B&W on the small steam line break, they assumed the 4 operator to start to shut the aux feedwater in five 5 minutes, and so this apparently indicates some kind of 6 discrepancy in that area.

7 Next I want to get into the thermal hydraulic 8 area. Right now, on the probabilistic risk analysis the 9 dominant scenario is the small break LOCA with no flow. 10 And we found the approach of using long-term probability 11 for a two-inch to six-inch break. I think we can refine 12 that by doing some more detailed analysis to bracket the 13 exact size that the natural circulation will stop. And 14 then, if we do that, it will depend upon a lot of 15 parameters. So I think the scenario will be the exact 16 size that the small break LOCA would cause the stagnant 17 flow situation is really very much site-dependent or 18 plant-dependent.

19 The reason for the more specific analysis on 20 that is with that, we probably can refine the 21 probability that certain breaks will occur, say, for 22 example, a two-inch or a three-inch. Apparently, if we 23 look at -- I talked to one of the persons at PNL and the 24 comment we have is that a two-inch break to six-inch 25 break probably has an order of magnitude difference on

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1 the probability of occurrence. So that will definitely 2 affect your curve of the failure probability, and the 3 curve that Mr. Peterson just showed, the dominating 4 curve, is the small break LOCA.

5 MR. BENDER: Are the natural circulation 6 characteristics grossly different for different 7 systems? That is, would the B&W plants be less likely 8 to lose natural circulation than the Westinghouse 9 plants, for example?

10 NR. BIAN: Without detailed analysis, I would 11 say probably if you have the much higher -- I guess 12 depending upon the different elevations of the two 13 components, if the heat source is much higher you have a 14 much higher driving source of natural circulation. I 15 haven't done the parametric studies on different 16 systems. I really caunct say.

But the recommendation is that we should look 18 into more on the exact situation; namely, the break 19 size. And different vendors have -- I mean even within 20 one vendor they have different arrangements of the 21 loop. The elevation difference of the heat sink and 22 heat source. So it is really kind of plant-dependent.

23 MR. THEOFALOUS: Why do you think the 24 elevation difference has anything to do with it? How do 25 you lose natural circulation?

MR. BIAN: Okay. As Steve mentioned about the 2 loss of inventory to a certain extent --

3 MR. THEOFALOUS: So what does that have to do 4 with the difference in elevation?

5 MR. BIAN: Okay. That is the point. The 6 point is when did the void form in the higher points.

7 MR. THEOFALOUS: You give me a break and I 8 will find the time in the injection level will 9 lose natural circulation.

10 MR. BIAN: But I think it is plant dependent. 11 MR. THEOFALOUS: It's plant dependent to the 12 extent that maybe different plants have different 13 injection rates, and therefore, the optimal size to 14 reach that plateau would depend. Because really, you 15 balance between what you get in and what you get out. 16 But it doesn't have to do with elevations.

MR. BIAN: That is a different aspect. That 18 will have an effect on natural circulation, but not in 19 this case.

MR. THEOFALOUS: Do you have any feel for what kind of a spread in break sizes would be in the mid-range where it just about balances so the thing could stay up?

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MR. BIAN: All we have done is a little research, and one-half inch is about the size. PNL doesn't know, I don't know, but we would like to know that. We do more work by ourselves or the owners 5 group.

6 MR. ZUDANS: It is interesting that Steve's 7 presentation and the present discussion indicates that 8 there is a limiting transient for PDS, and that would be 9 defined as a design basis transient the size of a small 10 break LOCA that leads to natural circulation 11 interaction. This is it.

All they have to do is analyze it in great All they would have all the information. Nothing Worse can happen.

15 MR. THEOFALOUS: Not true, because the small 16 break was analyzed in such a conservative way that that 17 might not be limiting after you do it right. So 18 something else might pop up.

MR. CATTON: It would probably fall right on 20 top of the next line, which was below, which I think was 21 the steam line break, if they take out some of the 22 conservatism.

23 MR. ZUDANS: That means that the statement 24 that this is a limiting transient is not necessarily 25 correct.

MR. CATTON: It's not, that's right.

2 MR. BENDER: It's very easy to make that 3 particular one go away.

4 MR. CATTON: You can pull it down until it 5 falls on top of the next one.

6 MR. THEOFALOUS: Then you can pull the next 7 one down. And I think really, we have to pull all of 8 these down.

9 MR. CATTON: Theo, I think the lack of natural
10 circulation probably has more conservatism in it.

11 MR. BELDER: Can we move on?

MR. BIAN: Ckay. The next one is the local mixing in the downcomer, and we did some analysis based on the Levy model. And while I will not go into the for the Levy model. I will just show you.

16 (Slide.)

1

I will show you the assumption that the model 18 got from. This model is basically assuming that you 19 have instantaneous mixing of the cold water with the hot 20 water at the no-flow situation, and we believe with this 21 model we can come up with a result which is really close 22 to the NRC result.

23 (Slide.)

And so we believe that is basicaly the 25 approach they used. We got a final temperature of 136

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1 degrees and they got 125, and the beta is .13 and theirs 2 is .12.

3 So that leads to the next question: How good 4 the approach is as far as realism is concerned. Of 5 course, there are certain arguments either for or 6 against that. One argument for that is that it is 7 conservative because the way that we do the analysis we 8 diin't allow for the hot water inside the downcomer, I 9 mean below the weld's location, to mix with the cold 10 water up above. And also, it didn't allow for the 11 thermal shield energy to be released.

But on the other hand, if you look at the 13 Criari data and also some analysis we did at PNL with 14 our code, we found there's a thermal stratification in 15 the cold leg, that the equation didn't allow for that, 16 the Levy model.

By the way, we add the wall heating on that, 18 too. So there is a no on that. Maybe the weld location 19 has an even hotter temperature than the Levy model 20 approach takes, if we allow for the cold water to settle 21 down into the lower part of the cold leg and just flow 22 towards the cold barrier, instead of the vessel side.

We don't know. There is certainly uncertainty
24 on that, and I think continued 3-D analysis will
25 probably help the situation to figure out exactly the

1 phenomenon that is involved in it.

(Slide.)

2

3 The last one I would like to go through 4 quickly is heating the ECC water, and I think it is 5 fairly clear that it would be very effective if we have 6 a stagnant flow situation, but it would be not 7 effective, but it is not critical, if the natural 8 circulation is maintained, because you have a continuous 9 source of heating coming from the cold leg.

But again, the effects on the core cooling and 11 also, for example, the active containment pressure, the 12 effect on those things really still is not analyzed well 13 enough or not analyzed at all.

14 ER. BENDER: Excuse me. Before you take that 15 off, what do you envision as the problems of heating the 16 ECCS? Are there any limitations that would have to be 17 put on what could be done?

18 MR. BIAN: Now, if we are worried about using 19 the ECC water for the no-flow situation, then we would 20 think that the core cooling probably is not mainly 21 caused by the temperature of the ECC water and it's 22 really mainly caused by the suppression of the water 23 level from the upper head, because of the steam forming 24 and so forth, and it is not the temperature of the ECC 25 water coming in.

1 MR. BENDER: If I wanted to set the ECC water 2 at 150 degrees instead of at the nominal 60 that was 3 used in the previous analysis, would that make the 4 problem go away altogether?

5 MR. BIAN: At least it would bring the small 6 break LOCA curve down, so that it would reduce the 6 7 probability of failure to maybe 10 or whatever the 8 new number should be, instead of that dominating effect 9 that we see right now.

10 MR. BENDER: And the only problem you see in 11 raising the temperature would be that -- would be what? 12 Would there be any problem except spending money?

13 MR. BIAN: There is a problem that we haven't 14 analyzed. For example, the effect on maintaining active 15 pressure of the containment. You have extra heat source 16 there and that may cause some problems. We don't know. 17 That has to be analyzed, really.

And two more comments that are not in the 19 slide, that just came up this morning. One is that the 20 argument on the cold leg temperature measurement against 21 the downcomer temperature measurement, and we know in 22 certain plants that the RDT locations are upstream of 23 the injection location, and in that case the data will 24 be in serious doubt of usage for the analysis. That's 25 all I want to mention on that.

And the second is the fuel coefficient. We found that using a constant value probably is not as realistic, depending upon what value it is. If you used a 300 Btu per hour, it probably is not as realistic as using a variable value based upon natural convection for at least the stagnant flow situation, because in the latter part of the transient that's where you have a concer. about low temperature.

9 Usually, the delta T is smaller, so that you10 have much lower H than the constant 300 value.

And that is the end of my presentation.
MR. SHEWMON: Thank you.
(Slide.)

14 MR. SIMONEN: I am Ed Simonen and my 15 responsibillity on the PNL assessment of PTS is in the 16 area of material properties. There are three areas 17 which I would like to comment on this afternoon. One 18 has to do with variability and the material property 19 determination and the justification of using 20 conservatisms. The second area deals with our support 21 of the use of statistical-based trend curves and some 22 comments on how we feel they ought to be used in the PTS 23 evaluation. Lastly, we recommend some testing that 24 could be done to enhance the development and application 25 of the statistical trend curves.

(Slide.)

1

With regard to the variability in material properties and the conservatism that is assumed, we examined the issue with respect to what is accepted ASME code practice of using lower bound fracture values versus what is used in the PTS evaluation. What is used r in the PTS, in addition to using the lower bound K-1R curve, are two contributions to variability. One is from measurement error and the other is from a generalized data base that is used in the development of the statistical trend curves.

12 With regard to the measurement error, there is 13 an added contribution of conservatism that comes in due 14 to the fact that property is determined three times 15 rather than just one time, and it is -- like in the 16 lower bound toughness value, there is measurement error 17 that is incorporated in that lower bound.

But in PTS we have an indirect determination 19 of the material property. We have to make measurements 20 on the initial property that has its measurement error. 21 and then the shift that also has a measurement error. 22 So there seems to be a piling on of opportunity of 23 putting in measurement errors that have nothing to do 24 with variability of material property, of real 25 variability in the pressure vessel material. 166

We estimate that this measurement error added conservatism is something less than 30 degrees, and this is based on, if one looks in the literature and finds how well one can determine Sharpey values and the RT NDT, it seems like the best one can do is to come within 6 10 degrees Fahrenheit.

7 The best experiments, where the material 8 property is controlled as best one can, the error never 9 goes down below 10 degrees. And if you add on the 10 10 degrees from the initial property and the 10 degree 11 contribution from the shift and do that square root of 12 the sum of the squares, it comes out to be, I think, 28 13 degrees.

14 So there is an added conservatism in that with 15 regard to the generalized data base because the trend 16 curve is based on a wide range of different types of 17 material, different compositions, different radiation 18 environment spectra, flux. There is a lot of 19 uncertainty that comes into this data base.

My point would be that the actual vessel wall has those same kinds of uncertainties with regard to what was the temperature that the wall was radiated at, the flux, the spectra, errors in the assumed composition. So these -- this added conservatism really seems to be justified because the vessel wall itself is

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1 subject to that same variability.

2 So the end result is that one looks at the 3 total conservatism between mean value and the upper and 4 lower bound approach; there is something over 100 5 degrees Fahrenheit that is involved between those two 6 estimates, and of that 100 degrees something less than 7 30 degrees seems to be not really justified on real 8 material property variation.

9 This seems to be a minor contribution in the 10 total analysis because these uncertainties are known 11 with some degree of accuracy. There is this large 12 substantial conservatism, but we do understand the 13 uncertainties. We believe that the RT NDT is an 14 appropriate criterion to focus on for identifying plants 15 that are susceptible to PTS conditions.

16 The next comment having to do with 17 conservatisms has to do with the NRC report, in which 18 sigma values are used on the initial property welds, but 19 not used for plates. It would be our recommendation to 20 use -- to identify the appropriate population and 21 uncertainty distribution for each type of material, and 22 always included in the analysis in the welds there is a 23 population density that is accepted by NRC and it is 24 used for the plates.

25

I'm sure a similar distribution could be found

1 with much less uncertainty, but feel that that

2 uncertainty should be included the same way as it is for 3 the welds, just for consistency in the analysis, to make 4 the analysis less complicated.

5 MR. SHEWMON: Do the properties of weights 6 enter into this consideration at all? Is that where the 7 Guthrie data comes from or what?

8 MR. ED SIMONEN: It could. There are some 9 plants in which plates could be limited. I wonder, with 10 the flux distribution, that if plants start 11 redistributing their core so that they redistribute the 12 flux to the welds, that eventually the plate will be 13 limiting.

I think what we are advocating here is a Social to the treatment of material properties, to not make exceptions for this and that, so it is clearest what the policy is.

18 MR. IRWIN: This measurement, by which you are 19 talking about a measurement error, is it a measurement 20 of fracture toughness to yield strength or whatever?

21 MR. ED SIMONEN: I would say that I am 22 particularly thinking of the EPRI round robin 23 experiment, in which they took a plate and chopped up 24 specimens from the same portion of the plate, sent it 25 around to different laboratories and had a whole bunch 1 of tests done on the same material, and then looked at 2 these uncertainties laboratory to laboratory, instrument 3 to instrument.

4 MR. IRWIN: I believe that was pre-CRAC Sharpy5 testing.

6 MR. ED SIMONEN: Right.

7 MR. IRWIN: That's not a very good comparison 8 from the point of view of the type of measurements 9 actually used in the NRC analysis for pressurized 10 thermal shock calculations.

MR. ED SIMONEN: You think the values should 12 be even less than what I'm saying?

MR. IRWIN: No. I think that you can't look MR. IRWIN: No. I think that you can't look at a whole bunch of small specimen data. You will salways see a very large scatter simply because you pick the tiny specimens. As you get a bigger and bigger for crack front, you will see less and less scatter, because the crack front will represent all possible variations to a greater degree.

20 What do you do about that?

21 MR. ED SIMONEN: Well, I guess you would have 22 -- the measurement error in the Sharpy's is greater than 23 it is for actual flux fracture toughness, which is 24 relevant to the PTS issue, so that there is probably 25 maybe a greater conservatism in here that really doesn't

1 represent performance of the vessel wall, that the 2 Sharpy's give more scatter than you would get with 3 appropriate kind of fracture toughness of vessel.

MR. IRWIN: Whether or not you can represent the scatter in terms of degrees Fahrenheit is also a question. It depends upon the slope of the curve when you plot that measurement result against temperature. If it is perfectly flat, then your uncertainty in temperature might be 200 degrees.

10 MR. ED SIMONEN: Right. That comment had to 11 deal with all of these uncertainties and the whole 12 analysis of when Sharpy uncertainties are introduced.

Another comment with regard to this Another comment with regard to this consistency on how to treat the uncertainty in initial property on the new plants, where the welds are characterized better than they have been in the past: for It's a question of how will they be treated, with the same type of signa uncertainty or will there be -- or will you take the new plant welds that are well characterized and say they are like the plates because they are well characterized.

This seems to be an opportunity for misunderstanding as to how NRC will determine these a material properties for different examples. It would be solved to have a clear, consistent way of treating these

1 in all cases.

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(Slide.)

A second area I would like to discuss had to 4 do with our recommended use of the statistical trend 5 curves. We do believe there are great benefits in the 6 use of the statistical trend curve. It allows the 7 owners to take credit for the low nickel that we would 8 normally be able to assign.

9 We believe that the statistical trend curve 10 should be used to describe all data and a statistical 11 model ought to describe the whole data base 12 satisfactorily, and that the reg guide upper cutoff 13 should not be used, as it is presently proposed, that a 14 statistical model should be identified that includes, 15 that does not make it necessary to put the upper cutoff 16 in the reg guide. And I think there are ways of doing 17 it that George Guthrie is looking at. That I think in 18 the end is what should be done.

19 Another problem with using the upper cutoff of 20 the reg guide is, what happens when new data comes in 21 that exceeds present reg guide line? If a new data 22 point comes in 20 points above the present line, does 23 that mean everything gets shifted up and then there is a 24 dramatic change in the valuation of all of the plants? 25 With the statistical curves, an outlier that

1 occurs like that simply gets incorporated in the whole
2 statistical data base and there is no dramatic change in
3 the evaluation of individual plants.

Also, I might point out limits to the 5 statistical curves with regard to our present PTS 6 evaluation, and pointing out that it is least 7 conservative at the extreme values, namely high copper, 8 nickel, and fluence, where copper is greater than .3 9 percent, nickel greater than .5 percent, and fluence 18 10 greater than 5 times 10.

11 Of the 139 points in the data base with the 12 statistical analysis, 7 satisfied those requirements, 13 which represents 6 percent of the data base. Within our 14 PNL or in the PTS evaluation, you look at the NRC list 15 of plants and the first five plants on the list are in 16 this category of 6 percent of the data base.

17 You must recognize that the uncertainty that 18 is given from the statistical uncertainty is really much 19 greater for these plants, because it is at the extreme 20 edge of the population of the data. So that is a 21 non-conservatism, if you would want to call it that.

Also, I might note that the reg guide is used after three of these top five plants as the upper cutoff. That is a serious issue, that many of the plants are affected by that issue by the upper cutoff of the reg

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1 guide.

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(Slide.)

3 The last area I wopuld like to discuss has to 4 do with identifying testing needs that would enhance the 5 development and application of the trend curves with 6 regard to a characterization of these radiated pressure 7 seals other than Sharpy testing. In the 1960's, there 8 was a rather ambitious effort to look at properties of 9 vessel materials, namely at Oak Ridge to try to identify 10 submicroscopic -- these mechanisms that are responsible 11 for embrittlement.

12 Since that time there have been many new 13 advanced characterization techniques that have been 14 developed and that ought to be promoted to use these 15 techniques to identify reasons why, for example, this 16 nickel influences embrittlement the way it does. Does 17 low nickel have a unique effect, perhaps, on 18 saturation? Is there a limit to the high nickel effect 19 and how it is supplied in the development of the trend 20 curves?

21 MR. SHEWMON: Now, nickel tends to enhance the 22 effective radiation? Is that the conclusion?

23 MR. ED SIMONEN: Right. It is a product of24 copper times nickel in the trend curve.

25 MR. SHEWMON: Are you close enough to this to

1 know whether that same effect is found on the other side 2 of the Atlantic? I nave heari that there is some 3 guestion over there, where they use a lot of higher 4 nickel alloys?

5 MR. ED SIMONEN: I don't know. Perhaps George 6 could feel free to comment.

7 MR. GUTHRIE: I think it is still pretty much 8 up in the air.

9 MR. SHEWMON: Do you mean whether their data 10 is different from ours or whether there is an effect of 11 nickel at all?

MR. GUTHRIE: Combustion Engineering thinks13 that there is an effect of nickel.

MR. SHEWMON: And it's a deleterious effect? MR. GUTHRIE: Westinghouse I think thinks there is an effect of nickel. People down in Santa Barbara working for EPRI think there's an effect of Russ Hawthorne thinks there is an effect of nickel, and almost everybody I talk to thinks that there o is an interaction.

And they way they look at it mostly at this point, people in the United States, is that when nickel agets in there, if you're familiar with the copper-nickel phase diagram, nickel can join a copper cluster and the thing still maintains a copper-like character, or so you 1 would guess from looking at the copper-nickel phase
2 diagram.

Nickel is transition metal and it is magnetic, and as you add copper to it it is still a transition alloy and it is still magnetic. And you get up to 60 percent copper and it goes over to a copper-like material and it is paramagnetic, and finally in high copper it is diamagnetic. It is not a transition metal any more.

10 If the same thing happens in small clusters, 11 nickel in small amounts joining a copper cluster would 12 make the clusters more numerous or make them bigger, and 13 still be copper-like in their character. If you try to 14 get too much nickel in there with just a little bit of 15 copper, it wouldn't work.

16 So what people think at this point is that 17 nickel is detrimental, especially in a high-copper 18 alloy, because the nickel can join the copper clusters.

19 MR. SHEWMON: In small amounts of nickel? 20 MR. GUTHRIE: In small amounts of nickel. But 21 when you get an awful lot of nickel, so that the nickel 22 can't join the copper clusters without driving them to a 23 transition metal or a nickel-type character, then the 24 additional nickel isn't going to do too much. And 25 people think that nickel by itself, with no copper in

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1 there, really isn't all that bad a thing.

2 So that's the way it's looked at in the United 3 States at the present time, or at least that is what I 4 believe. And I have tried to put together models more 5 recently that have this in them.

6 But I noticed in going over the printout 7 sheets that I have with me that it doesn't seem to do a 8 whole lot of good on some of the outliers. And I am 9 beginning to suspect that in the high copper-nickel 10 data, that it is just scattered and we just don't have 11 very much of it.

12 And I agree with Ed, I would sure like to see 13 somebody get some submicroscopie information on what the 14 mechanisms are. And it is very hard to get any 15 mechanistic information on these things. We would feel 16 a lot more comfortable if we had purely mechanistic 17 models that we really believed in, where the parameters 18 had a physical basis for each parameter and where we 19 could then go in and get a least squares adjusted value 20 for each one of these real parameters where the 21 parameters meant something.

But we're stuck with trying to put together an athematical models that fit the macroscopic data as we see it and which account for the macroscopic properties as we are aware of them.

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MR. BENDER: Why don't we move on.

1

2 MR. ED SIMONEN: I guess I would comment that 3 it took five to ten years to identify copper as being 4 deleterious, and it took another five to ten years to 5 identify nickel. That is kind of through empirical 6 searches for effects, and that is what, 20 years worth 7 of effort. And maybe some key understanding could 8 direct these trend curves to get them on line a lot 9 faster.

10 The last area I would like to comment is on 11 trend curve application. We've talked about in situ 12 characterization of vessels in our report. We've 13 mentioned chemistry measurement on the outside of the 14 vessel. There is also possibilities that in 15 micro-hardness tests on the vessel, some types of 16 information that you can get that reflect mechanical 17 properties on a small scale of actually doing tests in 18 situ on an irradiated vessel.

19 The last area of concern has to do with this: 20 If vessels have to be annealed, there has to be a way of 21 using the trend curve information to establish 22 re-irradiation embrittlement guidelines, that it is not 23 good enough just to use the two isolated surveillance 24 specimens to establish the re-irradiation embrittlement, 25 but one should use the trend curve data base.

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That is the best knowledge that there is on 2 the effect of radiation on the properties, and one ought 3 to develop the right kinds of tests that allow one to 4 know how the trend curve information will be used in the 5 re-irradiation embrittlement of an annealed vessel. 

MR. BENDER: Are there any questions?

2 (No response.)

1

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MR. BENDER: Let's move on them.

4 ED SIMONEN: Next, my brother, Fred Simonen, 5 will talk about fracture mechanics and probabilistic 6 fracture.

7 (Slide.)

8 MR. FRED SIMONEN: I guess Ed is 'r. Materials 9 toiay and I am Mr. Mechanics. I would just like to say 10 a few words on my critique of the fracture mechanics 11 issues and statistical rather than probabilistic 12 fracture mechanics. I guess there are really two 13 essential guestions.

14 (Slide.)

15 MR. FRED SIMONEN: One is, are the 16 conservatisms in these anlyses appropriate, and the 17 other is, what is the significance of these 18 probabilistic fracture mechanics analyses and how do 19 they relate to the more conventional interministic 20 analyses?

21 (Slide.)

22 MR. FRED SIMONEN: I have tried to sort 23 through some of these questions, and I guess I view it 24 in the way engineers do. Stress analysis, structural 25 integrity analysis. They tend to introduce

1 conservatisms in perhaps three different ways. One is 2 placing bounding values on the input parameters. In 3 this PTS example, talking about putting -- assuming flaw 4 sizes and toughness, we are taking minimum toughness to 5 overbound toughness curves and lower bound and upper 6 bound shift curves and that sort of thing, and the 7 important thing is, these types of conservatisms can be 8 quantified because you have got a data base to work 9 with, and this is addressed in the NRC work through the 10 probabilistic fracture mechanics.

11 There is another class of conservatisms I see 12 as just analytical or modeling assumptions, and in this 13 PTS work. For example, these things are like flaw 14 shape. Is it a short flaw, long flaw? Those things 15 aren't quantified. Clad effects. They are either -- it 16 could be accluded and warm prestress. The conservatisms 17 are not readily quantified, and these are not addressed 18 by the probabilistic fracture mechanics.

And as engineers usually perform these, they 20 usually attempt to take these assumptions, or you may 21 make a few non-conservative assumptions, but you always 22 want to make sure you kind of balance it against 23 something you are sure is an overriding conservatism. 24 If you leave something out, make sure you put some other 25 conservatism that is much greater than what you leave

1 out.

9

I guess a final safety factor or conservative simple safety factor which is, if you look at design and pressures according to the ASME code, we do have safety factors from two to three, and in some cases lower, and essentially what these allow for is factors which you really can't quite include in your model, kind of an unknown, unknowns.

(Slide.)

10 MR. FRED SIMONEN: Okay, what I have done on 11 this slide is to try to list what I feel some of the 12 unquantified conservatisms are in the NRC analysis. 13 Essentially, these are conservatisms that aren't really 14 reflected in the probabilistic fracture mechanics. They 15 are not quantified, so there may be an additional lower 16 failure probability in my view due to these factors.

I have listed the various items on this l8 column. I looked at the various models. I had what the 19 NRC staff fracture mechanics has done. I have listed 20 what the ASME code would give you as guidance. And in 21 our report we went through guite an effort to try to see 22 just how would the ASME code dictate a PTS evaluation. 23 The code really kind of skirts around the issue, so you 24 kind of have to imply what the code would tell you, and 25 I think the reason why you look at the code, this was a

1 set of rules that was written long before this PTS 2 concern arose. So it was, I guess, a set of rules 3 written by the industry when they were looking to 4 justify rules to the public, and showing that these are 5 in fact conservative rules rather than trying to justify 6 the use of a particular vessel, and then I have listed 7 some of the industry's responses.

8 The first item, the safety factor, none of the 9 PTS evaluations have put any kind of engineering type or 10 code type safety factors. The code is very vague on 11 this issue. I would read in the code a factor maybe of 12 about the square root of two, about 1.4, 1.4 for the 13 faulted type loads we are talking here. There are two 14 other factors, clad thermal expansion and flaw length. 15 The code does not require you to prove clad thermal 16 expansion. You can just forget the clad is there.

17 The NRC staff has included this, and this, the 18 values I have seen in the NRC report, I have read 19 something like 17 percent increase in stress intensity 20 factor. The NRC evaluation includes very long flaws, 21 essentially infinitely long flaw where the ASME code and 22 in the Appendix G Section 2 would say a six to one 23 aspect ratio flaw, and the NRC codes would say something 24 like, that would give about a 20 percent enhancement in 25 K.

1 And essentially what I did can compare the 2 code with the NRC approach. The NRC does not include a 3 safety factor. They do have a couple of other minor 4 conservatisms included that are not dictated by any 5 provisions in the code. It is quite interesting. You 6 take the 17 percent, take the 1.17 and multiply it by 7 1.2, and you get a factor of 1.404, which is very nearly 8 close to the code, so I guess the conclusion is that the 9 way NRC is doing their analyses essentially would give 10 us very much the same result, if you follow the code.

MR. ZUDANS: The 17 percent is not a
12 conservatism. It is a reality. The 20 percent, yes.

13 MR. FRED SIMONEN: Okay. Well, I guess there 14 is other conservatism. I look at just what is your flaw 15 description. You are assuming the flaw extends through 16 the clad.

17 MR. ZUDANS: Yes, that exercise, although it 18 works out nice, it is not reality. Seventeen percent is 19 a real thing. You have the clad, and it is going to 20 expand thermally, and it is going to change the 21 stresses.

22 MR. FRED SIMONEN: That is given that you have 23 a flaw of two that extends from the base metal through 24 the clad. I agree.

25 MR. BENDER: Let's move along. We are quite a

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1 bit behind schedule.

MR. FRED SIMONEN: There are a number of other 2 3 conservatisms I would mention here. There is the vessel 4 life. The flaw description has been based upon flaw 5 size description essentially. There are flaws that were 6 volumetric flaws in the weld. I guess all of the 7 analysis, to take a worst case assumption, that this 8 flaw is located at the vessel ID, and it is oriented 9 normal to maximum stresses, and extends through the 10 clad. The NRC did not include warm prestress. I 11 believe that there are many of these transients where 12 warm prestress will be a factor, and this is not 13 guantified in the probabilistic work. I guess all of 14 the analyses did consider crack arrest. The code does 15 allow crack arrest, although I think it was put in there 16 in the context of a large break LOCA, and applying it to 17 PTS, we would say that you might want to apply it in a 18 somewhat more conservative manner than was written into 19 the code.

And I guess the other factor is this question 21 of suppression of crack growth by tough clad. None of 22 the analyses have included that, but there is work at 23 Oak Ridge that will be looking at just that factor, and 24 it may show that this is a rather conservative 25 assumption as far as preventing crack growth

1 lengthwise.

2

(Slide.)

3 MR. FRED SIMONEN: I guess our conclusion is 4 that essentially the NRC staff analyses are essentially 5 consistent with the conservatisms of the ASME code. The 6 probabilistic fracture mechanics does quantify many of 7 the conservatisms in deterministic analysis, but there 8 are many conservatisms that simply are not quantified in 9 this, and the failure probability does not reflect these 10 effects. I guess in looking at the fracture mechanics 11 we also feel that perhaps the greatest uncertainty in 12 all of these analyses is the size and nature of the 13 flaw. The flaw size distributions are, I think, based 14 upon some very limited data.

MR. ZUDANS: How much conservatism do you think there is in the fact that all of the stress raculations are based upon a two-dimensional model that a three-dimensional, and on the fact that it is assumed that a whole vessel is uniformly cooled down the rather than just a limited range in a downcomer? Do you thave a feel for that?

22 MR. FRED SIMONEN: I think on initiation 23 perhaps not too much. If you note, most of the crack 24 arrest analyses simply, as they are done in the simple 25 1-D models, simply do not show a big effect of crack

1 arrest in PTS type transients, and I would think that a
2 three-dimensional analysis that would reflect the fact
3 that the embrittlement on the worst, there is a
4 gradation embrittlement down the length of the region.
5 As the crack grows long, it will tend to run into
6 tougher material. Some of the cooling from the
7 downcomer may be very severe on one part of the weld,
8 but may be much less on another part.

9 Perhaps if you were to go in and look at some 10 of these three-dimensional effects, the fracture 11 mechanics analysis may predict arrest in many more 12 situations than they are now. But within the simplistic 13 analyses, you don't seem to predict arrest for very many 14 of these transients when there is pressure,

15 particularly.

16 MR. BENDER: Is that it, Mr. Simonen? Are you 17 about finished?

18 MR. FRED SIMONEN: I have got some other quick 19 things, just kind of leading into the discussion on 20 inspection.

21 (Slide.)

MR. FRED SIMONEN: We did some simple 23 calculations to try to estimate what will be the benefit 24 of inspection on vessel reliability. The method, what 25 we did was use some of PNL flaw detection estimates.

1 These were used to modify NRC staff estimates of failure 2 probability, and when the results essentially predict a 3 failure in decreased probability and corresponding 4 allowable increase in RT NDT.

(Slide.)

5

6 MR. FRED SIMONEN: Just to illustrate, 7 essentially you have seen curves like this this morning. 8 These are a replot of some of Jack Strosnider's data. 9 All this shows is that as you increase RT NDT by some 10 amount, the probabilistic analyses show some 11 corresponding increase in failure probability. Factor 12 ten and failure probability correspond to about a 20 13 degree difference in RT NDT.

14 (Slide.)

15 MR. FRED SIMONEN: What we have done, then, is 16 taken -- okay, there is a vu-graph in your package that 17 kind of illustrates some of the details of the 18 calculation. I will skip that in the interest of time 19 here, but what we have done is taken flaw detection 20 estimates that Tom Taylor will be talking about in just 21 a minute. Essentially what they show here is, using an 22 approved inspection technique, this is something above 23 and beyond the type of requirements that are now used as 24 a typical ASME code type inspection. The estimate 25 showed that the detection probability is quite dependent

1 upon clad and surface finish. As you go to smoother, on 2 the upper end, che best detection capabilities for 3 smooth strip clad, about 95 percent flaw detection for 4 flaws greater than a guarter of an inch, and on the 5 worst end for manual unground clad it is down to a level 6 of about 50 percent for flaws even as big as one-half to 7 one inch.

8 Okay, going through the calculations, this is 9 what we predicted on what is the benefit of in-service 10 inspection. The one column is simply the predicted 11 factor of improvement in reliability, and these range 12 from like 16 to 32 on the best clad conditions and down 13 to something, oh, three to five on the very rough clad, 14 and a corresponding increase in RT NDT allowable 15 increase.

As I say, these are just rough estimates at this point, and they are intended only to say, is there some real benefit in doing a good in-service inspection. I would not use these at this time for any kind of licensing decision. You would have to do much incre detailed evaluation. I guess what the trend shows is that at most you can get maybe a 30-degree benefit on allowable increase in RT NDT for the best conditions. The worst condition is, it may be down as low as ten begrees. (Slide.)

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2 MR. FRED SIMONEN: So I guess our conclusion 3 is that improved in-service inspection can justify an 4 increase in allowable NDT, and that under the best 5 conditions, it can be increased up to about 30 degrees 6 Fahrenheit, or even under the worst conditions you can 7 justify increases up to maybe only about ten degrees 8 Fahrenheit.

9 Fom Taylor is next, and will cover just what 10 is behind some of these estimates of flaw detection 11 capability.

12 MR. TAYLOR: My name is Tom Taylor, from PNL, 13 and as Fred has just said, I will discuss the 14 nondestructive testing techniques that are currently 15 used or are currently available for use in pressurized 16 thermal shock.

17 (Slide.)

18 MR. TAYLOR: This vu-graph summarizes the 19 non-destructive testing techniques that are currently 20 proposed or used in the field. This particular 21 technique of dual transducer L-wave techniques was 22 developed by the Germans about ten years ago 23 specifically for interrogating the base metal underneath 24 clad of the reactor vessel. A focus transducer 25 technique has been recently developed by the French,

1 likewise for interrogating other clad crack techniques.
 2 These are fabrication defects that this particular
 3 technique has been developed for.

In the United States, some people have proposed using a single transducer, either an L-wave or a sheer wave at a relatively high angle and using a pulse echo or an emersion technique, and another particular vendor has proposed using a full V technique where sound is bounced off the OD surface of the vessel. This is the ID clad surface, and then trying to the detect cracks on the ID surface.

MR. AXTMANN: What is it bouncing off of? MR. TAYLOR: It is bouncing off the OD surface. The sound is introduced on the ID clad surface for the vessel. It penetrates through to the OD surface and is bounced off at a 45-degree angle, and it is supposed to detect flaws in the clad surface here. To date, our evaluations have shown that this technique has not been evaluated. This technique has, and the subsequent slides are based upon an evaluation of this particular technique that was developed by the Germans several years ago.

23 (Slide.)

24 MR. TAYLOR: The dual probe for the crack 25 detection involves sending a sound beam in with one

1 element and receiving it with another. Both elements 2 are canted at an angle and cross just underneath the 3 clad surface. This helps near surface resolution under 4 clad resolution, and this shows you a schematic diagram 5 of the sound beam directivity pattern of the dual unit 6 transducer.

7 MR. SHEWMON: One of the elements of this is 8 that one is a senier and the other is a receiver? 9 MR. TAYLOR: That is correct, and they are 10 carted at an angle, so that the sound beam would be 11 focused underneath the surface. Any further questions?

(No response.)

13 (Slide.)

12

14 MR. TAYLOR: As Fred has shown earlier, since 15 this is a technique and we know it works, how well does 16 it work? Well, on an internal round robin test at 17 Batelle and with some flaw signal amplitude measurements 18 on various blocks made available to us through EPRI and 19 our own that have been fabricated, these are our 20 estimates of probability of detection for a nice strip 21 ground perpendicular and with the sound beam going both 22 perpendicular and parallel to the direction of the clad.

We estimate that there is a 95 percent
24 probability of detecting cracks that are a guarter of an
25 inch in through wall depth and greater.

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MR. SHEWMON: Are these tight cracks you are 2 looking at?

3 MR. TAYLOR: These are thermal fatigue type 4 cracks. The data is based upon thermal fatigue type 5 cracks and some hydrogen cracking.

6 MR. SHEWMON: Are they put under any 7 compression when you are looking at them? Or are they 8 by their origin under compression?

9 MR. TAYLOR: The only compression would be any 10 compression resulting from cladding. The way the blocks 11 were fabricated was to induce a thermal fatigue crack 12 and then clad over the thermal fatigue crack. As you 13 can see, as the surface roughness, which is what this 14 illustrates, increases, our probability of detection 15 decreases considerably.

16 MR. BENDER: The vessels that we are concerned 17 about now, do they correspond to those at the bottom of 18 the list, or at the middle of the list, or at the top of 19 the list?

20 MR. TAYLOR: That is a very good question, and 21 in large part unknown. What we do know today is that 22 all vessels have to undergo a surface examination so 23 undoubtedly between here and up there have been some 24 kind of surface condition done to them, and Mr. Bender, 25 exactly how much is not known at this point, and it

1 would be incumbent upon the utility to determine that.

2 MR. SHEWMON: Do you mean Robinson won't tell 3 you? You haven't gone to the trouble of asking 4 Westinghouse? Or what?

5 MR. TAYLOR: I mean that often times the 6 utility itself doesn't know what the condition of its 7 vessel is.

8 NR. SHEWMON: They ion't know how it was 9 fabrictaed? Nobody knows any more?

MR. TAYLOR: They know how it was fabricated.
11 They do not know or have not taken pictures or
12 documented what the inside condition is like.

13 MR. SHEWMON: Do you know how the Robinson 14 vessel was fabricated or how any of the vessels in 15 question were fabricated?

16 MR. TAYLOP: Do I personally know how they 17 were fabricated? They were fabricated to Section 3 18 rules.

MR. SHEWMON: When you learn which one of
20 those is, you might come back and tell us some day.
MR. TAYLOR: If the information were made
22 available to me, I could tell you.

23 MR. BENDER: I think the staff needs to get a 24 better story on this, and I would just suggest that the 25 story is not very well known right now. Go ahead.

MR. TAYLOR: I have also done some studies to 2 show the relative sensitivity of various calibration 3 techniques

(Slide.)

4

5 MR. TAYLOR: In this particular slide, the 6 signal response of a notch or a thermal fatigue crack is 7 plotted as its depth through wall and the response if a 8 three millimeter FBH is plotted here. The response of a 9 Section 11 2 percent notch, which is the current 10 American standard calibration notch, is plotted here. 11 The response of thermal fatigue cracks are plotted here, 12 and the response of through clad notches are plotted 13 here.

As you can see, the current Section 11 2 15 percent notch is used in amplitude, is much above or is 16 considerably above the thermal fatigue cracks. If this 17 were used as a calibration reflector, one could have 18 difficulty in detecting thermal fatigue cracks unless 19 one adds gain or goes at some percentage level below the 20 distance amplitude curve achieved by the use of this.

21 MR. SHEWMO : Do you know what the Germans 22 were looking for when they developed this technique and 23 what standards they used?

24 MR. TAYLOR: Yes, the Germans used not a three 25 millimeter but a two millimeter flat bottom hole, and

1 they were looking specifically for under clad cracks as 2 a result of fabrication defects.

3 MR. SHEWMON: So you are saying there is a 4 substantial difference between the ASKE notch which the 5 regulatory people in this country accept and what the 6 Germans use as a standard, and they feel reflects what 7 they choose to inspect to? Is that right?

8 MR. TAYLOR: That is correct, yes. I might 9 also add that currently there are no specific code 10 requirements for detection of under clad cracks. It was 11 only intimated in the current vessel Reg. Guide that the 12 cracks near the inner surface are important. Exactly 13 what size one is supposed to detect is not --

14 MR. SHEWMON: That is progress, you have got 15 to admit.

MR. TAYLOR: Slight progress.

16

17 MR. BOCK: Can you tell us anything about 18 ultrasonic imaging mechanology which is in use in other 19 industries, and whether it has been investigated for 20 reactor vessel inspection?

21 MR. TAYLOR: It has not been extensively 22 investigated for reactor pressure vessels. EPRI 23 currently has a program in which they are going to use 24 some ultrasonic holography for examining the vessel, but 25 to date I ion't know of any particular reports.

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MR. BENDER: Can we move on? (Slide.)

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3 MR. TAYLOR: In summary, I would say that the 4 future work is to be in optimizing the detection 5 techniques and developing a standard criteria for 6 calibration reflector and for flaw recording levels that 7 currently does not exist. And finally, one needs to 8 develop criteria for a verification block, and this 9 would be a block with under clad cracks so one could 10 prove one's procedure upon it.

11 MR. BENDER: Let me just put things in 12 context. Some time ago when the staff came in, probably 13 six or eight months ago, something like that, there was 14 some optimism that the techniques available in Europe 15 could be readily translated into application in this 16 country. What is the judgment today?

17 MR. TAYLOR: The judgment is, the techniques18 are adaptable to our industry.

19 MR. BENDER: What have we done in the last six 20 months to get in a position to use them?

21 MR. TAYLOR: I can't see that there has been 22 any specific requirements done other than these studies 23 that the NRC has through its research to develop the 24 technique that is currently part of the program. 25 MR. BENDER: In order to use them, do we have

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1 to establish that the condition of the vessels that they
2 would be used on is such that they would be -- that
3 those inspection techniques would be meaningful?

MR. TAYLOR: Yes.

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5 MR. BENDER: So you would have to investigate 6 each vessel that is under consideration to determine 7 what its surface condition is and its surface 8 conditions, I presume, would have to be of a certain 9 guality to make the technique usable?

MR. TAYLOR: That is correct.

11 MR. BENDER: It might be well if that were 12 written down in some way so it were understandable by 13 somebody.

14 MR. TAYLOR: It is addressed in the report.
15 MR. SHEWMON: The report that what?
16 MR. TAYLOR: It is addressed in Appendix L of
17 the PNL report. There is also a report coming out
18 through the research branch that details more of the
19 under clad crack study that is currently going on at

20 PNL.

MR. BENDER: Other questions?
(No response.)
MR. BENDER: Is that it, Mr. Taylor?
MR. TAYLOR: That is it.
MR. BENDER: Thank you. Why don't we take a

1	ten-minute break? When we come back, we will listen to
2	the Westinghouse presentation.
3	(Whereupon, a brief recess was taken.)
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1 MR. BENDER: Can we reconvene, please? Would 2 the people in the back of the room sit down, and we will 3 proceed with the Westinghouse owners group presentation.

4 MR. SPEYER: My name is Daniel Speyer. I'm 5 chairman of the Analysis Subcommittee for the 6 Westinghouse owners group.

I would like to point out that this is my last
8 day as chairman of the Analysis Subcommittee for the
9 Westinghouse owners group. Beginning tomorrow Frank
10 Scheuer takes over the reins of the chairman of the
11 Analysis Subcommittee.

MR. BENDER: Are you being fired?
(Laughter.)
MR. SPEYER: No.
(Slide.)

We have had a chance to go through the draft report from the NRC, and I would like to talk about that seport. I would like to tie in as part of that gliscussion the work that we have been doing -- that is, the Westinghouse owners group -- and then hopefully I can bring out some more perspective on some of the guestions that have been raised by the subcommittee. As a part of that, please feel free to ask the same kind of a guestions again of me. And, finally, I'm going to show the bottom line gives our conclusions

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1 about the draft, the screening criteria that have been 2 presented by the NRC.

3 The owners group is in substantial agreement 4 with the work that has been done by the NRC. In 5 particular, we agree with the idea of the use of RT NDT 6 as a screening parameter. In order to come up with 7 screening criteria based on RT NDT the staff used 8 operating experience to select the screening criteria 9 and then used the probabilistic approach to support or 10 give additional support for the screening criteria.

11 We are in agreement with all of that, although 12 we did things in the opposite direction. We used the 13 probabilistic approach first, and then in fact the staff 14 pointed out that our probabilistic approach didn't seem 15 to match the operating experience. We took a look at 16 that and in fact reached a different conclusion. We 17 reached the conclusion that the operating experience in 18 fact just about fell in line with the probalistic stuff 19 we did.

We do disagree on some technical details. A, 21 I just mentioned, the consistency of operating 22 experience with the PRA. There is some dialogue about 23 the frequencies that we had in our probabilistic study. 24 NRC came up with different numbers, as you heard -- some 25 higher, some lower -- that I think will be the subject

1 of some ongoing dialogue.

With regard to the calculational techniques in fracture analysis, there are two areas that we have some difference. One is the effect of clad. We have basically assumed a neutral posture for the clad in the fracture mechanics calculations. In fact, it is our respectation that this is probably in that benefit of the cladding effect, fitting the clad, keeping it closed, as 9 opposed to residual stresses.

10 The other area is the use of finite flaw for 11 arrest. Historically, the work that's been done by the 12 Westinghouse owners group initially considered finite 13 flaw for initiation and kept a self-similar geometry, 14 and in fact, finite flaw for arrest, in fact, we used 15 something that we called the two flaw criteria. I'm not 16 going to go into the detail of that. But subsequently, 17 rather recently, in fact, after more discussion with the 18 NRC we did switch to continuous flaw for arrest; 19 however, made with the finite flaw for initiation.

20 We believe that is a significant conservatism, 21 and we think the truth lies somewhere in between those 22 two; that is, between the position we had, which was 23 self-similar flaws, 6 to 1 aspect ratio throughout, 24 versus the other end of the assumptions one could make 25 which is a continuous flaw for after-crack initiation.

We believe that higher values for the screening criteria
 can be justified.

Let me state these last two bullets I'm going 4 to amplify a little more on at the end of my talk when I 5 give a final conclusion slide, but we do believe higher 6 values for screening criteria could be justified. And 7 as far as the programs for plant-specific evaluations, 8 we think 18 months prior to exceeding this criterion, 9 criteria would be appropriate. And we also point out 10 that those specific analyses should permit event 11 sequence comparisons.

12 I will describe more later on what I mean by13 that statement.

MR. BENDER: Excuse me. It's probably better to ask this question, since you have some differences between yourselves and the staff concerning the flaw geometry.

18 Could you say why you think you are more 19 likely to be right than the staff is?

20 MR. SPEYER: Ted, did you hear the question? 21 I think I will leave that to the fracture mechanics 22 types. May I suggest we hold that and get back to it, 23 because I'm not technically competent.

24 MR. BENDER: I'm willing to wait.
25 MR. SPEYER: Okay. We will get back to that.

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(Slide.)

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Very briefly, I'm not going to read from the a next two slides except to say they are in the handout which I believe has been brought in. And the slides, the next two slides, go through a progression of reports that we provided to the NRC. I will note a few things on them.

8 A, the first one, WCAP-10019, was the kind of 9 design basis accident evaluation that has been 10 traditionally done that in fact was guite a bit in the 11 past now in terms of where we are today on what has been 12 done for PTS.

13 The May 28th is a significant report. That 14 was the one where we did in fact use the probabilistic 15 approach to come up with probabilities for various event 16 sequences. There was a fluence report. That was the 17 last bullet on that slife.

18 (Slide.)

19 Subsequently, we did a step-by-step review of 20 the owners group emergency response guidelines, the 21 ERGs, relative to the impact on PTS, and you heard about 22 that a little earlier from Steve Hanauer.

I would print out the owners group perspective 24 on that is we found out some important things by that 25 review. We found out areas where we think changes are

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beneficial. We are going ahead and doing that. We 2 found areas where clarification is useful, notes could 3 be added. We are doing that. However, the bottom line 4 is on the whole we feel the ERGs that we had were in 5 fact quite good and did adequately address PTS, and we 6 are improving them. That is ongoing.

MR. SHEWMON: What's the ERGs?

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8 MR. SPEYER: The emergency response 9 guidelines. They are the generic procedures that the 10 owners group was comparing. Those were then brought to 11 the plants. The plants should take those and prepare 12 their site specific emergency procedures.

13 MR. SHEWMON: You mean that we heard the 14 Westinghouse procedures misquoted this morning when the 15 statement was made they were fair densities and then 16 take the pressure back up to 2000 psi, or that was 17 indeed the best way to cope with the PTS in those 18 conditions?

MR. SPEYER: I guess what I'm saying, A, is 20 that was a bit of an overstatement; B, in fact there are 21 cases where one would like to keep the pressure up. For 22 instance, if you had a transient where you might trip 23 the reactor coolant pumps -- the steam generator tube 24 rupture, for instance, tripping the reactor coolant 25 pumps puts you into a stagnation condition which raises

1 more potential PTS questions than if one were able to 2 keep the reactor coolant pumps running. Keeping the 3 reactor coolant pumps running would be generally 4 synonymous, at least if you forget loss of offsite 5 power, which is a low probability event, and keeping the 6 reactor coolant pressure system up would enable you to 7 keep the pumps running.

8 MR. SHEWMON: But does the NDT go up to 2000 9 psi to keep these pumps running in the plant?

10 MR. SPEYER: Current criteria are on the order 11 of 1250 to 1500 psi. It depends upon the 12 instrumentation used. I would say 1500 psi would be a 13 typical number that we could use for this discussion.

14 MR. SHEWMON: Why does he have to keep it up 15 to 1500 psi?

16 NR. SPEYER: Because of Appendix K questions 17 for the small break LOCA. If the reactor coolant pumps 18 are not tripped at pressures lower than that, and that 19 is, let's say, 1250 plus, this brings you up to 1500. 20 If they are not tripped prior to going to 1250 for very 21 specific break sizes and locations, you get inventory 22 loss that will be fairly significant. And if you lose 23 the pumps at the worst time into their transient, it is 24 a fact you will in fact violate Appendix K; that is, 25 2200 degrees PCT. To be sure you don't lose the pumps at that worst time in the transient, you trip the pumps purposely before you get to that point, before you have gotten significant loss of inventory. The reason for the excess loss of inventory with the pumps running is you tend to keep an elevated two-phase mixture, so you have more mass going out as opposed to steam relief, and yet you have less energy removal out of the break.

9 MR. BENDER: Just to pursue Dr. Shewmon's 10 question a little bit further, if we set aside Appendix 11 K and just say what fuel failures are we subject to by 12 this kind of action, would the depressurization further 13 result in massive fuel failure, or are we just concerned 14 about violating the legal limit?

MR. SPEYER: I think it's partly the legal 16 limit B. I think it is a little more than that, and I 17 would not feel too comfortable with small break LOCAs 18 without having the reactor coolant pump criteria in 19 there. I believe it is useful on low pressures, not 20 based on detailed calculation.

21 MR. CATTON: Before you get away from 22 emergency response guidelines, we continually hear about 23 emergency training of operators. Are you doing anything 24 to try to get better methods for the operators to 25 interpret what is going on? MR. SPEYER: You're my straight man, but it's 2 a little early.

(Slide.)

3

4 These are programs, and we'll jump back to 5 this later on, but I would just mention now the slide 6 I'm showing now is current Westinhouse owners group 7 PTS-related programs. Two of them are in fact generic 8 training packages, one in the area of PTS and one in the 9 area of steam turbine tube ruptures, steam generator 10 tube rupture.

11 MR. CATTON: I was thinking of a little bit 12 more than training. In the LOFT program where they 13 monitor pump current, that showed that that could tell 14 them pretty quickly what was going on. There are 15 probably other ways like energy balances on the steam 16 generator or whatever.

17 Is there any research going on at all looking 18 into that?

19 MR. SPEYER: Yes. That is here under the 20 reactor coolant pump trip criteria development; also 21 somewhat related to systematic evaluation effects of 22 stagnant loop transients.

23 Under the reactor coolant pump trip criteria 24 development we are looking at the plants and inspecting 25 the plants and comparing it, doing additional analysis

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1 to see can we improve our reactor coolant pump trip 2 criteria so we don't have to trip the pumps. Either we 3 could allow lower pressure, or are there some other 4 symptoms we should be looking at.

5 MR. CATTON: Are you sure the process 6 interpretation in the control rooms is good enough? 7 Maybe we need to do a little bit better. Is that a part 8 of this?

9 MR. SPEYER: I don't know. I don't believe it 10 is. I believe it is based principally on what we have 11 available right now.

MR. CATTON: I think there is a real MR. CATTON: I think there is a real opportunity to improve the operator's awareness of what is going on behind the wall. I don't see owners groups foliong it, and I don't see NRC doing it. It is kind of like you're going to live with what you've got, and you're just going to be telling the operators some more.

18 MR. SPEYER: Well, we are as far as the review 19 of procedures. As part of that we are developing these 20 pressure-temperature curves which will tell him when he 21 is getting into a potential challenge, but that is not 22 additional instrumentation. That is an additional 23 diagnostic tool.

24 MR. CATTON: Why aren't things, like I think 25 the time constant of the RT NDTs must be 200 or 300

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1 seconds.

2 MR. SPEYER: Of the RT NDTs? I believe 3 they're on the order of a couple of seconds, half a 4 second or two seconds.

5 MR. CATION: Well, then, you've already got 6 all the instrumentation you need to do a pretty good 7 heat balance in your system.

8 MR. SPEYER: I'm pretty sure the time constant 9 is on the order of two seconds.

10 MR. CATTON: Well, then, you've already got 11 all the instrumentation you need to do a pretty good 12 heat balance in your system.

13 MR. SPEYER: I'm pretty sure the time constant
14 is on the order of two seconds.

MR. SHEWMON: I think it is very important that you be able to drop pressure. And you say on one thand you're going to provide your operators with a surve. On the other hand you're going to say if we're going to make him trip his pumps when he hits 1500 psi, 20 so he is going to bleed it on down.

21 MR. CATTON: I think he has to know whether 22 he's overcooled or undercooled.

MR. BENDER: Well, let's leave it that we wish the operating procedures and the instrumentation matched up a little better and move on. MR. SPEYER: But we are, to a very serious - MR. CATTON: I was afraid I might have to
 3 sneak out.

4 MR. BENDER: Well, I'm going to allow you a 5 few minutes to make your pitch, and you may get some 6 sympathetic ears, but go ahead.

MR. SPEYER: The other point is the procedures 7 8 do in fact provide for termination of safety injection. 9 I believe the pressure is 700 psi -- correct me if I'm 10 wrong -- in the procedures. And that is for RCS 11 temperatures less than 350 degrees. There are other 12 indications that are required in order to do that 13 termination. I think it seems very level, and 14 pressurizer level. But those are specifically in there, 15 they were in there, and we've looked at them again as 16 part of our PTS review to ensure that he doesn't keep 17 the pressure up when he shouldn't. And so if the 18 temperature is less than 350 degrees, that is a 19 potential PTS scenario, and therefore, he does in fact 20 have specific guidance or direction to terminate the SI 21 when the pressure is approximately 700 psi.

22 (Slide.)

This is the rest of the outline of the reports that the owners group has provided. I centioned the review of the emergency response guidelines. Those are

1 the procedures, the generic procedures.

Beyond that we have the July 15th, September 3 2nd, those two reports. I'm not going to mention those 4 in this slide. They are on the next slide in more 5 detail.

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(Slide.)
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7 In the May 28th report from the Westinghouse 8 owners group we demonstrated the likelihood of severe -3 9 cooldown transients was on the order of 10 . That 10 was, A, for crack initiation; and B, that was simply the 11 probabilistic view of event sequences without any 12 question about probability of flaw extension. There was 13 no combination with what you've heard the NRC 14 subsequently did in that area.

The conclusions of this particular study were that RT NDTs in the range of 310 for longitudinal and to 335 for circumferential flaws were acceptable. That, in the part, is why we're saying the current screening criteria to conservative.

Subsequently, the July 15th owners group 21 report combined the 5-28 report with the staff's 22 probabilistic fracture mechanics calculations. We came -6 23 out with a number of less than 10 for probability. 24 That is small, and in fact small compared to the 25 proposed safety goals for core melt. That was discussed

1 earlier.

I would point out you saw plot of probabilities versus RT NDT, and one was the owners group, Westinghouse owners group, and the other was the staff's; and there was a large discrepancy for small break LOCA. I didn't address that at the time because I vanted to be sure, but the owners group submittal with the low probabilities for small break LOCAs or for small plreak LOCAs less than two inches. That is, the cases to that lead to breakage of natural circulation, that lead to stagnation and therefore lead to questions about mixing and have the potential as far as PTS is concerned were not on that. Those were handled by the deterministic calculations. Those are not on that figure.

16 So that is the reason why you see -- one of 17 the reasons why you see such a divergence in the 18 probabilities between the NRC's plot and the 19 Westinghouse owners group plot. So we used the 20 combination of the probabilistic approach both for event 21 sequences and fracture mechanics to demonstrate plant 22 safety for all Westinghouse vessels.

We have done this. I have here the number 270
24 degrees Farenheit and 325 for circumferential flaws.
25 This is in part because all of the analysis we did

1 supports higher numbers, quite a bit higher numbers,
2 certainly 30 degrees higher at least for this small
3 break LOCA which is an event that has been termed an
4 outlier; that is, it has a reasonably high probability
5 of getting to very low temperatures because of mixing
6 questions in part, because of stagnation.

7 For that particular transient we did detailed 8 deterministic calculations. We took the worst size --9 that is, the minimum size -- that leads to the breakage 10 of the natural circulation, and we did detailed 11 deterministic calculations. We did that. The numbers 12 you see here are based on finite flaw for initiation. 13 However, subsequent after initiation they're based upon 14 infinite flaw.

15 That is in conformance with what the NRC 16 requested, and in fact, based on that, using DPA, using 17 warm prestressing, we obtained a number of approximately 18 270 degrees for longitudinal and 325 for 19 circumferential. We believe that is a conservative 20 analysis, in particular because the question about the 21 finite flaw for arrest versus continuous flaw.

That fits in any event fairly well with the A NRC's proposed screening criteria. So I think that Hends credence to their screening criteria. And if you haven't gotten the drift yet, in fact, when I get done

my bottom line is going to be we are supporting the NRC
 screening criteria. We think it is appropriate.
 although we do believe it is a little bit too
 conservative.

5 Fed, there was a guestion raised. Would you 6 like it addressed now?

7 MR. BENDER: Sure. My question has to do with 8 explaining why the Westinghouse owners group disagrees 9 with the staff's concept concerning flaw size and growth 10 characteristics.

MR. SPEYER: In particular, I guess - MR. BENDER: The question is continuous versus
 discontinuous flaw characterization.

14 MR. MEYER: Ted Meyer, Westinghouse. I will 15 handle it in two different ways. One is the flaw 16 initiation and the other is flaw arrest. One is cleaner 17 than the other.

18 For flaw initiation we believe a finite flaw 19 is appropriate, and the NRC is in apparent implicit 20 agreement with that fact, based primarily on data that 21 has been taken from pre-service inspections of vessels 22 during the fabrication process, for flaws that have been 23 found have been found to be either typified or bounded 24 by a 1 to 6 semi-elliptic shaped flaw. In fact, those 25 typically were not surface flaws. They were probably

1 embedded flaws, which adds another degree of 2 conservatism that we haven't taken credit for in this 3 initiation. When it comes to arrest it is not nearly as 4 clean as even that.

5 We do not obviously have a hard empirical 6 basis for using a specified shape finite flaw for 7 arrest. If we had, we probably wouldn't be having this 8 discussion right now. We would have shown our data or 9 whatever and been on with using a fine flaw for arrest.

10 What we do have is more qualitative than 11 quantitative assessments that says the flaw shape should 12 not change from the finite flaw to a continous flaw upon 13 a first initiation during a thermal shock.

14 Now, there is apparently test data that shows 15 both kinds of things that it goes through continous 16 flaw, and then it also maintains some finite flaw 17 shape. Some of the tests showing that it goes through 18 continuous flaw do not have what we consider as the 19 benefit of cladding to help constrain the growth of that 20 flaw. So we don't have a hard empirical basis, and that 21 is why for the sake of getting on with the resolution of 22 this subject on an interim basis we did not press the 23 issue, because in fact we don't have a hard basis for 24 it; but in fact we are doing more work, again analytical 25 rather than empirical at this time, to further justify

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1 our assumptions, be it a 1 to 6 or 1 to 7 aspect ratio 2 or whatever.

In the future apparently Oak Ridge is going to 4 be doing more work on empirical basis for looking at 5 crack growth with the clad and with the assumption of a 6 starting flaw that is finite.

7 MR. BENDER: With regard to the growth of a 8 flaw, does it make a difference if the flaw penetrates 9 the cladding?

10 MR. SHEWMON: Do you mean before it starts to 11 move under the stress?

12 MR. BENDER: Before or during.

25

MR. MEYFR: Well, it does make a difference if MR. MEYFR: Well, it does make a difference if the flaw is through the clad or beneath the clad. If it is beneath the clad, it is obviously more constrained than if it is through the clad. If it is through the the the you lose any benefit, or you may lose any benefit that you may assume or calculate for constraint due to 19 clad.

20 MR. BENDER: Well, I want to be a little bit 21 more explicit. If the flaw penetrates the clad do you 22 still argue that there is a limit on the rate of growth, 23 cF will it still be an elliptical flaw of relatively 24 short length?

MR. MEYER: I don't have a well-founded answer

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1 to the guestion. But, first, I want to clarify what I 2 think the guestion is: Is it more likely to become or 3 approach a continuous flaw if the flaw is a through clad 4 flaw?

5 MR. BENDER: Yes, that is the question. I'm 6 just asking the question because I know there's one 7 plant that says it is, and I would like to know what 8 Westinghouse's view is.

9 MR. MEYER: I think the only thing that we can 10 say right now is that the probability of going towards a 11 continuous flaw is greater for a through flaw or a 12 through clad flaw than for a flaw that is beneath the 13 clad. I don't know if I could say anything more 14 detailed right here now.

MR. BENDER: Okay. That's enough.

15

16 MR. SHEWMON: I would like to bring up one 17 point. If I wanted to learn about what kinds of flaws 18 are likely to be found or exist in vessels before they 19 went into service or ten years into service, where might 20 I look?

Let me talk a little bit more on that. It 22 seems to me that the good news about this is I don't 23 think the flaws are there. The bad news is I'm not sure 24 we could detect with the ASME-approved techniques if 25 they were. And so a lot of this is going to come back

1 down to somebody coming in, or part of it is in saying 2 there are no flaws there of the sort which all fracture 3 mechanics assume to give them a job and get on with what 4 they like to do best.

5 Okay. Any thoughts for one minute would be 6 nice.

7 MR. MEYER: As far as a reference document for 8 summarizing flaws, I personally don't know what the 9 document is. I'm sure there is information that is 10 available in some written form. In fact, some of the 11 code requirements were based on some of that kind of 12 data. I don't know what it is here. We certainly can 13 find out what that is if you want it and provide such 14 information.

15 What was the balance of your question?
16 MR. SHEWMON: That's enough. Thank you.
17 MR. ZUDANS: Your analysis of fracture
18 mechanics was based on through the clad flaws?
19 MR. MEYER: Can you repeat the question? I

20 couldn't hear you.

21 MR. BENDER: Would you speak into your mike? 22 MR. ZUDANS: The analysis that Westinghouse 23 owners group did on fracture mechanics, did you assume 24 the initial crack to be through the clad? 25 MR. MEYER: Westinghouse assumed the flaw was

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1 underneath the clad, starting at the base of the clad 2 material. And the clad is intact except we don't take 3 benefit for the fact that the clad is intact. We say 4 there is no negative and no positive effect of the 5 clad. We use the zero effect. Because there are 6 positive and negative effects there that aren't 7 well-quantified at this time, we used a zero effect.

8 MR. ZUDANS: And in the structure model you 9 simply did not have the clad in?

MR. MEYER: In a structural model we used a 11 zero effect of clad.

12 MR. BENDER: Can we go on, Mr. Speyer? I want 13 to get done in 10, 15 minutes at the most.

14 MR. SPEYER: The final point I would like to 15 make about the small break LOCA analysis that we did, in 16 the deterministic calculation we did in fact use the 17 better estimate of mixing in that calculation. That was 18 based on the Criari test data.

19 There has been some discussion about the 20 Criari test or in general about the measurement of 21 temperature in the cold leg versus the temperature in 22 the downcomer for conditions of pump running or natural 23 circulation. And I think the general view is that there 24 is pretty good mixing. The condition of stagnation, 25 Criari did some tests into that condition. Mixing is 1 pretty good. In fact, there has been a model developed 2 called a teacup model. It is basically flow into a 3 finite volume and flow out and mixing within that 4 volume. If one defines the volume appropriately, then 5 the data from the Criari test can be predicted pretty 6 well. That in fact is what we used.

7 It is our expectation that in fact of our 8 sources of hot water -- this was discussed in fact at an 9 NRC meeting or an NRP meeting -- there are the sources 10 of hot water that are present, in particular the lower 11 plenum, that were not modeled on the Criari test. So it 12 would be our expectation that there are in fact 13 additional sources of hot water that would make the 14 situation even better.

15 In any event, our analysis assumed a better 16 mixing calculation using the Criari test. It also 17 included heat input from the appropriate heat slabs that 18 were available in the cold leg and in the vessel region. 19 (Slide.)

20 Going on, I would like to touch on the current 21 owners group PTS-related program. As I said, we are 22 developing emergency response guideline modifications. 23 That was based upon the review that we already 24 completed. We are implementing critical safety 25 functions for reactor wessel integrity. That is

1 basically a graph or graphs of pressure versus 2 temperature. As to the reactor pressure, let's hold the 3 pressure fixed for a moment as we drop the temperature 4 in the system. We would approach a curve, and in fact 5 at some point we would cross a curve that would give the 6 operator indication that he is getting into a potential 7 PTS regime.

As one went further along this line that I am 9 talking about into a PTS regime, another curve would be 10 crossed. That would tell the operator you are into a 11 PTS situation, go to -- or you are into a potential PTS 12 situation, go to a function restoration guideline, which 13 in essence says simplistically drop everything else; you 14 ought to worry about PTS to get yourself back into an 15 acceptable regime. And that is in fact what would be 16 done as far as a hierarchy. That is the second highest 17 of the function restoration guidelines. The only one 18 that is higher would be inadeguate core cooling. In 19 fact, if the operator got into a situation of high core 20 exothermocouples, that would in fact take precedence 21 over PTS, but that would be the only one.

So we are developing that, and that is 23 designed to give the operator quantified information 24 that he can use as part of the procedures. Those are 25 going to be developed for various plants based on

1 various full power years. We are doing a generic 2 training package for operator training on PTS. This is 3 to be able to give consistent information and up-to-date 4 information the best we can to all of the plants for 5 their use in training.

6 We're doing the same thing, too, in the steam 7 generator tube rupture because this is a potential PTS 3 transient that has to be looked at. It also happens to 9 be a very complicated event, and that is why it is 10 appropriate to develop a true generic training package 11 for that event as well again for consistency.

12 . This is not to mean, by the way, that people 13 like CPOL and others who are in fact upgrading training 14 and have done so and have developed packages -- those 15 are very good packages. This is to provide consistency 16 and provide assistance for all the members of the owners 17 group, which is in fact all of the operating 13 Westinghouse reactors.

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As was mentioned before by Ted Meyer, we are doing testing and analytical work in the area of warm prestressing, specifically with respect to clad effects and flaw shapes.

5 We are working on reactor coolant pump trip 6 criteria, to be able to prevent tripping the reactor 7 coolant pumps under conditions where it is not needed 8 and, in fact, where tripping the pump would be 9 detrimental either because it tends to give more 10 potential to PTS concerns, or, in fact, it removes some 11 of the operator's capability of very effectively 12 terminating transients.

Finally, we are doing a systematic evaluation Finally, we are doing a systematic evaluation for the effects of stagnant loop transients. To summarize before I put up my final slide or final two fields, the screening criteria of the NRC, even if it is roo conservative in the view of the owners group, is in fact reasonable or, to put it another way, is not unreasonable. It enables all of the parties to effectively utilize our resources. It is technically a sound method. And it ensures safety.

22 (Slide.)

Therefore, we believe we should go forward with the NRC proposed screening criteria, up to 70 to 70 degrees for longitudinal and 300 degrees RT NDT for

1 circumferential flaws. Again, we believe the values of 2 approximately 30 degrees greater would be more 3 appropriate, but we think we should go ahead with what 4 the NRC has proposed. Plant-specific programs be 5 developed 18 months in advance of the screening 6 criteria. NRC has proposed 3 years. We believe 18 7 months would be a more appropriate number.

8 We also point out that there needs to be work 9 done on what, in fact, are the requirements to be met in 10 a plant-specific analysis, not what is the analysis that 11 the plant does and how does it do it, but what are the 12 criteria one has to meet? Presumably, that is going to 13 be a probabilistic space. We do not think you could 14 pick a single scenario -- for instance, a small-break 15 LOCA -- and call that the PTS DBA. We think it will be 16 in probabilistic space, but we do think we have to have 17 those criteria developed before we go doing the 18 analysis. And that I think will be a little while in 19 the future. We also think 18 months is sufficient here.

20 MR. CATTON: What is the basis for the 18 21 months rather than 3 years? You just think that is 22 plenty of time to do the job?

23 MR. SPEYER: I think it is plenty of time,
24 yes. B, I think there is some problem if you make it
25 too long.

1 C, in fact, the plants are actively looking at 2 this for other reasons; that would be not necessarily 3 just the safety, but they have the economic questions 4 that, in fact, are more limiting, if you will. If you 5 have a crack that initiates and arrests and you did not 6 have a safety problem, you maybe would have to write off 7 the vessel.

8 So we believe 18 months would represent a 9 balanced amount of time in order for the plant, 18 10 months prior to exceeding the screening criteria, the 11 plant would submit to the NRC the program they are going 12 to use to resolve it.

13 MR. SHEWMON: You are taking as self-evident 14 that the operators or owners at the plant are likely to 15 look down the road 3 to 5 years and wonder about core 16 modification, is that it?

MR. SPEYER: I take it, in fact, a little
18 differently than that. I believe the study that EPRI
19 did, looking at all the utilities, found that something
20 like 85 percent of the utilities have, in fact,
21 initiated low leakage patterns. It may be for a
22 multiple of reasons, but almost everybody has done it.
23 As far as the plant-specific programs, we
24 believe you should utilize comparative plant sequence

25 analysis. What I mean by that is we, in fact, have done

a generic probabilistic study that considered event
 sequences. We believe that, A, represents an average
 Westinghouse plant, if you will. B, it, in fact, is
 4 representative of all the Westinghouse plants.

And we feel the appropriate way to go is for 6 plants to utilize that study, if they wish, and then 7 tailor it by showing or, first of all, showing that, in 8 fact, it is appropriate for them, making such changes as 9 they would feel better tailored to them.

10 For instance, a plant with low head safety 11 injection pumps would probably take that report and 12 modify the calculational numbers to represent the fact 13 that they do not have high head safety-grade charging 14 pumps.

15 They would also, I think, appropriately take 16 into account operator action -- excuse me -- better 17 operator training, upgraded assistance, upgraded 18 procedures, and then utilize that generic report, tailor 19 it somewhat to the situation, and use that as pposed to 20 a full-blown probabilistic study done by each plant. 21 They can do that, but I do not think that is necessary 22 or appropriate here.

Finally, the way one would utilize such a Prior to passing a screening criteria analysis would be done

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1 either, A, to show, in fact, that a higher screening 2 value was, in fact, appropriate for that plant either 3 because of plant-unique systems, control systems, what 4 have you, or lack of control systems.

5 B, the plant could show that there are some 6 events that fall outside a probability acceptance goal. 7 Both events would then be calculated on a deterministic 8 basis to show whether or not they are acceptable. In 9 fact, exactly the way we did our calculations for the 10 small-break LOCA.

And finally, the third level would be if, in 12 fact, it is shown that there are unacceptable results 13 or, in fact, the probabilities are higher than 14 desirable, there would be remedial actions. The 15 remedial actions could extend from, you heard, reheating 16 the fuel and storage tank to other areas.

I might point out on that heating storage 18 tank, it is not clear right now that there is a major 19 problem with doing it, but I do not know what is 20 involved in plant-specific cases to do it, number one.

Number two, it does have potential impact, at 22 least on containment integrity calculations, and that 23 may raise the pressures above some of the design 24 pressures that are shown in FSARs. I do not know; that 25 would have to be looked at on a plant-specific basis. Finally, we think there are a number of conservatisms present currently in the way the calculations are being done. I think there is probably general agreement about that, although there is fifterent agreement as to quantification of them and should we remove them now or not.

7 We do believe it is important that for the 8 future, given that we are going to use the screening 9 criteria approach as we start to have more results 10 coming in, that definitively would give a basis for or 11 more definitively give a basis for removal of 12 conservatisms.

We think it is appropriate to factor that in We think it is appropriately adjust the screening criteria to recognize the removal of what were for presently less quantified conservatisms than will be proce quantified in the near future.

18 That is what I have to present for the 19 Westinghouse Owners Group. Are there questions?

20 (No response.)

MR. BENDER: If not, I would like to thank the Westinghouse Owners Group for giving us this presentation. I think it helps us to understand the several views that exist. And we will take those into 25 account when we try to develop some recommendations to

1 put before the full committee.

2 Could we stop the Owners Group presentations 3 for a few minutes so that I can try to solicit comments 4 from the consultants and those members of the committee 5 that might need to leave by 4:00 o'clock, so that at 6 least we have the benefit of a collective set of 7 thoughts at least while everybody is here. Let me start 8 with Ivan Catton.

9 Ivan, you have some thoughts?

10 MR. CATTON: I have several things. Earlier 11 this morning we discussed the A transient. I really 12 think the Staff should analyze this so we can get -- we 13 are using best-estimate techniques -- so we could get a 14 better feel for what kind of conservatisms are involved 15 in the results that they have been showing us.

16 I think Steve made the comment about the 17 operator having to walk between overcooled and 18 undercooled and the desire not to be ultraconservative. 19 I think this emphasizes the need for establishing what 20 symptoms tell us quickest whether we have overcooling or 21 undercooling.

And I think it really deserves more attention, and that to try to throw the whole thing into more and better training for the operator might be a mistake. MR. BENDER: You are saying a study of the

1 diagnostic capabilities is in order?

2 MR. CATTON: That is right. The only thing 3 that has been done along those lines is the brief study 4 that was done on LOFT on how well pump current could 5 tell them what is going on.

6 I think they can do a lot of things, 7 particularly if, as was just mentioned, the time 8 constant of the RTDs is 2 seconds. You could surely do 9 a heat balance on the system and know what is happening 10 and be able to tell the operator what is happening. I 11 think just more training is not going to do it. I think 12 it is too much to expect.

As far as the four items that Steve mentioned, If I think no immediate action is wise, because I think Is there is still a great deal of conservatism in the Staff for position on the thermal hydraulic side as to the spec. If There is still a great deal in fracture mechanics, I think that 270 degrees is fine, and with 3 or 4 years before the first plant runs up against the wall, it seems to me there is plenty of time for adjustment if it is not right.

I would like to see some magic number where the plant has to shut down and somebody has not done something and have that number fixed so that when the time comes there are no surprises.

## MR. BENDER: Monroe?

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MR. WECHSLER: I find myself interested in the guestion of the calculation of the delta RT NDTs. Following the discussion we had earlier, I find it difficult to understand the wisdom of the kind of two-tier approach that is being used, in which for the higher fluences, I understand that this depends upon copper concentration, but generally for the higher fluences, the Reg Guide 1.99 is used or the Reg Guide 1.99 criteria are used, whereas for the lower fluences the Guthrie fit is used.

I think consideration should be given to using the Guthrie fit throughout the entire range of fluence values. That is, for the entire population of points to obtained from the surveillance samples.

16 MR. BENDER: Do you have any view about this 17 two sigma criteria?

18 MR. WECHSLER: Well, I think the basis for 19 that is fairly well explained in the NRC draft 20 document. And one might argue with the precise values. 21 Certainly, there is nothing sacred about the values to 22 plus or minus 1 degree F., and certainly there is some 23 room for argument there. But I think in general terms 24 the document justifies the basis for introducing that 25 two sigma approach, and I am generally satisfied with it.

## MR. BENDER: Herb.

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MR. KOUTS: Well, I certainly agree with what Ivan Catton has said just now and what Theo is going to A say on the subject of analyzing these transients. And I think some of this analysis is really under way now. It is just not at the stage where it can be reported. I believe there is Los Alamos work proceeding along these 8 lines.

9 But as this continues, of course, there are 10 some insights that will develop. And one thing that 11 bothers me very much, especially listening to what I 12 have heard today, is how much space is there between 13 what operators are supposed to do if they are subjected 14 to conditions of pressurized thermal shock that they 15 have to worry about, and LOCA. And, you know, you may 16 be put in a position where you are damned if you do and 17 you are damned if you do not.

18 With respect to such things as repressurizing 19 the plant, is there space enough in between the two sets 20 of requirements under these two circumstances, so that 21 trying to get out of trouble in one place you do not get 22 into trouble in another. And I think this needs 23 exploring.

24 Beyond this, I notice that during the day we 25 have not heard anything about elastic plastic fracture

1 analysis and its implications for this problem. It 2 seems to me that this is a fruitful area for research 3 programs to be initiated. I think that NRC really ought 4 to get more heavily involved in the elastic plastic 5 methods.

And, in particular, I would like to follow up on some of these comments that Professor Irwin made in the note that he wrote to you on the question of whether or not you get crack arrest in material above the upper shelf if it is initiated in the brittle region. I think this is a very important thing to try to establish: under what conditions this takes place and under what conditions it does not.

14 MR. BENDER: Theo.

15 MR. THEOFALOUS: First, I would like to say 16 that I am very pleased with the progress that the Staff 17 has made in the recent months. And also, I like very 18 much the forceful way in which they presented their 19 approach. I think it is a sound approach, and they are 20 on the right track.

I agree for the time being with the screening criterion also. And I like that approach because it is specific because it puts things down so that other people can look at them. And therefore, hopefully, in this way one can keep refining things so eventually you

1 can come to where the truth is.

And in that spirit, I would like to suggest that this aspect of refinement not be left completely, but try to be formulated in such a way by the Staff so that it becomes easy and possible by the different interested parties here to keep working on a similar framework instead of everybody working in his corner.

8 And what would help a lot in this direction is 9 if a base case or a set of base cases are documented in 10 a way that they are totally scrutable so you go out and 11 take a look at it and say, I do not agree with that, you 12 had better do it this way; and then if everybody agrees, 13 then you can work on that step. And if everyone was to 14 do that, a lot of the guestions we had today, for 15 example, from me and Ivan and so on, they would not be 16 present.

17 So that I do not disappoint Mr. Kouts, yes, I 18 think the analysis of those specific transients, the 19 fact that the only experiments we have should be done, 20 although there are difficulties with such allowances 21 that are to be recognized. I think one can do quite a 22 bit more than saying, I have difficulties, therefore I 23 cannot analyze. And I think we can learn quite a bit 24 from such analysis.

25 I think that this is -- also I want to make a

1 note agreeing with Ivan again that we should come up 2 with procedures for the operators that basically are 3 diagnostic signatures, so that they can recognize the 4 situation and know what to do.

MR. BENDER: Zenon.

5

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6 MR. ZUDANS: At this stage, everything has 7 been said. But I have to add some caveats. I 8 personally feel that one should be able, by continuous 9 collapsing and removal of conservatisms, to define what 10 is called PTS design basis. But that is my feeling, 11 although I heard Westinghouse Owners Group saying that 12 that was not a problem. I have no qualms about these 13 criteria the NRC presented. I think they are adequately 14 conservative.

I would like to repeat again that I would like to see some of the conservatisms more specifically identified. Some are identified now by the Westinghouse 8 Owners Group. Others were stated by Dr. Hanauer. And, 9 for example, what is the effect of three-dimensional 20 stage of temperature and pressure stress distribution as 21 one compared to one used in these analyses? How 22 important is that aspect? It is not quite clear. It 23 could be significant conservatism, or it could also be 24 none.

The other thing is I do not understand the

1 philosophy of excluding cladding from the vessel. It is 2 physically there, and not to have it in all models, heat 3 transfer and structural model, it just does not strike 4 me as being right.

5 MR. SHEWMON: Was it ignored in the heat 6 transfer?

7 MR. CATTON: No. They deal with an effective 8 heat transfer coefficient. That has in it. They put it 9 into the heat transfer.

MR. ZUDANS: Did they consider the heat 11 capacity, or just conductivity?

12 MR. CATTON: I think it is considered. 13 MR. ZUDANS: Well, if I am smart enough and 14 considerate enough, I can sit and reason everything out 15 and come up with a clean core. And that is not the 16 case, to show that this is indeed true by analysis.

MR. CATTON: That would be easy enough to do.
MR. SPEYER: It is excluded implicitly in the
Westinghouse Owners Group with its associates for the
heat conduction aspects.

21 MR. ZUDANS: All right. I remain unconvinced 22 about statistical basis on operating experience on these 23 events, having three B&W and four or five Westinghouse, 24 and putting them in the same basket and coming up with 25 statistics. One of the two that hurt and the other two

1 got advantages of the first. So I do not know if we 2 should treat Westinghouse separately from B&W. You 3 might come out differently. That's all.

MR. BENDER: George.

4

5 MR. IRWIN: I believe the NRC has made a very 6 good effort insofar in response to this problem. And I 7 also appreciate that the probabilistic work at 8 Westinghouse has been quite useful.

9 Now, with regard to conservatisms, I like 10 conservatisms myself. I am glad to see them. I do not 11 particularly want them to go away. But I would like to 12 know how much they are. And I made a little list of 13 these that are just in the fracture mechanics area.

For example, the variation of the mean K.1.C 15 with crack trunk length, that will be a substantial one 16 because the more rapid the chill the more we are 17 propagating tiny cracks, and the tinier the crack the 18 greater the mean K.

A second one was that the crack shape after initiation is definitely not going to remain self-similar, but it is definitely not going to be infinite. And after all, the shell course is only about 80 inches, and if you crack goes halfway through an 84 8-inch wall, you have got 4 inches. That is a length of 25 20-to-1. And the calculation of 20-to-1 in a crack

halfway through the real reactor vessel is quite
 significant in its effect on the K value.

The third one was warm prestress. Now, that 4 is going to take time. People will have to agree on how 5 to do the experiments. And it may not come soon, but 6 definitely there are benefits of warm prestress which 7 can be ascertained in a straightforward manner -- and 8 should be.

9 And number four was the fully plastic 10 conditions for deep cracks. That has been mentioned 11 before. I am not sure that we will get a great deal on 12 help on that score. But there is an uncertainty there 13 that should be removed and can only be removed by going 14 in and studying the deep cracks on an elastic plastic 15 basis.

Numbe: "ive overlaps the fluid. And I do not to not the know anything about the fluid dynamics. But it does seem odd that you can have cold water coming down like a plume and at the same time chilling 360 degrees of circumference. And I believe that discrepancy was mentioned this morning by Steve Hanauer.

Now, that made quite a difference in the racture mechanics calculation. Whether I cool three wall thicknesses or five wall thicknesses, all the calculation assumes you cool 360 degrees.

Well, those are my comments.

1

2 MR. PENDER: Bill, I will let you have the 3 next word.

4 MR. BOCK: I will keep it short, since you 5 have most of my comments already.

6 Traditionally, what we were faced with in 7 reactor problems, we have always relied on a 8 defense-in-depth approach. And I see us getting away 9 from that, in that right now we are oriented toward 10 placing all of our eggs in one basket; namely, that we 11 believe that the reactor vessel is in a ductile, low RT 12 NDT condition.

And we are not approaching at this point any And we are not approaching at this point any to of the other ways around it, which would include, for to example, trying to reduce transient frequencies or to trying to get better inspection techniques.

17 The way the screening criteria is currently 18 set up, it looks like we are going to defer those until 19 our first line of defense, meaning the ductility of the 20 vessel finally gives up. And I would like to see us 21 pursuing the others perhaps a little more vigorously and 22 perhaps independently of what the current RT NDT of any 23 particular vessel is.

24 MR. BENDER: Forrest.
25 MR. REMICK: Thank you. Just an observation.

1 The operating reactor data base is based on several 2 hundred reactor-years of domestic experience. I would 3 be curious to know what the foreign experience would 4 show. Would that enhance our understanding? Would it 5 improve the data base? Could it be used? Or would it 6 just further complicate our lack of understanding?

7 Also, I wonder very much about the naval 8 reactor operating experience. I do not know if the 9 owners groups know about that. Do they have access to 10 the information? I do not know if the NRC has that 11 access.

12 And along that line, has anybody thought about 13 Shippingport, which I now understand is decommissioned. 14 Is there anything about that vessel? I know some 15 designers who were involved in Shippingport, and we are 16 somewhat glad to see that Shippingport might be 17 decommissioned. Is there any information available, any 18 thought about how that might be used?

19 And if the answer to my questions about do we 20 know what the naval reactor experience is is "No," then 21 maybe the subcommittee or the committee itself might 22 take up the naval reactor people offer for exchange of 23 information and see if this is where they might share 24 some of their thinking?

25 MR. BENDER: Paul or Bob?

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MR. AXTMANN: I am kind of curious about the seven reactors defined as "at most risk," perhaps the three worst, whether the owners groups or the individual plants have looked seriously at the possibility of changing the fuel loads not 3 years from now but starting today and what the penalties for that might be?

7 I noticed on one of the slides from WOG that 8 they have a report, and I am anxious to see that, but I 9 wonder if any of the involved people have any comments?

MR. BENDER: Is there a hand back here?
 MR. MORRIS: I could comment on that in a
 minute when I get up there.

MR. BENDER: Would you identify yourself?
MR. MORRIS: I am Ken Morris of the CE Owners
15 Group. But I can address that when I get up.

16 MR. BENDER: Fine. We will hold it until then.

I am in the enviable position of being able to 18 say, having heard all of the comments, I agree with most 19 of them, and I io not think there is much that I want to 20 add to this conversation beyond saying that what I would 21 like to do is collect the set of comments here and put 22 them into some more organized form and presumably pass 23 them on to the committee as the collective views of this 24 working group.

25

Were there any problems that anybody sees in

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1 making that kind of presentation? We heard different 2 viewpoints, but I did not hear much dispute about what 3 was presented. And, hopefully, the committee will, in 4 turn, digest them and pass them on in a somewhat similar 5 way to the Regulatory Commission.

With that, I think I would like to go back to 7 the CE Owners Group, and we will follow from there. 

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MR. MORRIS: My name is Ken Morris and I'm with the CE owners group of the Omaha Public Power Jistrict. Dr. Hanauer has often wondered who I am with, so I was going to try to clear that up to start with.

5 I would like to respond to a question 6 regarding fuel loading patterns. I cannot speak for the 7 owners group; I can speak for Fort Calhoun Station. We 8 are scheduled to go into our refueling outage beginning 9 January 3, 1983, at which time we will go into a low 10 leakage fuel loading, which we currently estimate will 11 make a rather substantial reduction in our fluence; 12 probably a factor of two.

I don't have too many of the other CE owners description of the other CE owners are or timing for any changes in their fuel loading patterns.

17 MR. AXIMANN: Do you have a number for what 18 happens with the power level?

19 MR. MORRIS: There is no penalty regarding the 20 power level. There will be some reductions in our 21 operating margins. We do feel we have adequate margins 22 to maintain our currently licensed power.

23 MR. AXTMANN: So the economic penalty is 24 essentially little?

25 MR. MORRIS: That is true. I might say that

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1 we will explore methods of making further reductions in 2 that fluence, also, in the future.

I would like to say that we do appreciate the opportunity to comment on the staff's evaluation of the reactor pressure vessel thermal shock. The received the report middle of last week and we have performed a prelimimary review of that report. We recognize there have been some, we consider, very substantial improvements in the program, in the staff's program since we had seen last spring.

11 We are pleased that the evaluation confirms 12 the staff's and the industry's findings that there is no 13 immediate need for plant modifications to protect 14 against pressurized thermal shock, other than those 15 improvements in procedures and training which are 16 already underway or completed.

17 The NRC proposes to use the screening criteria 18 involving RT NDT as a method to identify those licensees 19 which must perform additional kinds of specific 20 evaluations. The CE owners group believes that proposed 21 approach is rational and conservative, and will serve to 22 identify those plants with potential pressurized thermal 23 shock concerns. Properly applied, we believe this could 24 be a very effective method.

25 The CE owners group has revised the methods of

1 calculating the RT NDT, and agrees with the staff. We
2 believe this method will provide a reasonably accurate
3 and conservative value for RT NDT. We agree that
4 plant-specific evaluations are needed to determine what,
5 if any, plant modifications to equipment, systems and
6 procedures may be required.

7 As stated in the report, more detailed 8 guidance for these evaluations must be provided. 9 Acceptance criteria must also be developed. We urge the 10 staff and their consultants to work closely with the 11 industry on the development of these guidance and 12 acceptance criteria.

We believe caution must be used to assure that
the guidance and acceptance criteria do not become
overly prescriptive and thereby eliminate other
activities which could assist in resolving pressurized
thermal shock concerns.

18 The CE owners group believes that the timely 19 development of guidance and acceptance criteria, coupled 20 with reasonable schedules for the completion of any 21 additional evaluations, plant-specific or otherwise, 22 will permit an orderly and timely resolution of the 23 pressurized thermal shock concerns.

I wart you to know that we stand ready to work 25 with the staff and your consultants on the development of the acceptance criteria and the guidelines for
 resolution PTS. And I do want to make a few comments
 regarding ongoing activities of the CE owners group.

4 You have heard quite a few comments regarding 5 procedures and operator training that CE owners group is 6 developing. We began sometime ago a training program 7 for PTS. We also have been working for quite a while on 8 emergency procedure guidelines which do incorporate PTS 9 concerns. PTS work has been a major part of our 10 training and our procedural work. We are proceeding 11 with that work as rapidly as we can to assure that it 12 does reflect concerns for LOCA and PTS, and we agree it 13 is something that needs to be clearly defined to the 14 operating people.

15 That is about all I have to say. Everything 16 else has been said today, so there wasn't any point in 17 my repeating it.

18 MR. SHEWMON: Given the comment about what 19 kind of room you feel your operators have for 20 maneuvering or getting confused between PTS and LOCA 21 concerns, have you gotten into that enough to feel that 22 that is not a problem with your present procedures, or 23 assumed procedures?

24 MR. MORRIS: I can't give you an operating 25 parameters that would guantify that margin. We are

1 insuring that the proper people, LOCA, PTS, are involved
2 in the procedure guidelines so that we are not improving
3 one at the same time doing harm to some other set of
4 procedures. There has to be a balance there.

5 The way we believe it has to be done is 6 letting the experts in the areas work hard on those 7 procedures. After that is done, have those procedures 8 and procedure guidelines thoroughly reviewed by the 9 operating people.

10 MR. SHEWMON: You haven't heard any screams 11 from that guarter yet?

12 MR. MORRIS: No, we haven't. We are paying a
13 lot of attention to the procedures and training.

14 MR. BENDER: You will recall that the staff 15 position suggests an 18-month period. Excuse me, three 16 years. My timeframe is fouled up. A three-year period 17 of preparation prior to seeing the bell ring, so to 18 speak. And the Westinghouse group has suggested 18 19 months. What is your view?

20 MR. MORRIS: I guess our view is we are going 21 to proceed. Let me take my owners group hat off now and 22 put on my OPD hat, if you will permit me, because I 23 can't speak for the other utilities on this one. But 24 Omaha Public Power District, our vessel is one of those 25 on the top of the Hit Parade. You can bet we will

1 proceed as timely as possible, consistent with the 2 staff's effort on this to get the proper corrective 3 actions identified and implemented just as soon as we 4 can.

5 I think someone else mentioned commercial 6 interest in this, and we are very sensitive to the 7 commercial inteerst, also. I just can't hardly see us 8 identifying an action that should be taken to resolve or 9 to reduce the PTS concerns and not taking those actions 10 once we are in a position to implement them. It just 11 doesn't make any sense for us.

MR. BFNDER: Other questions for the CE owners 13 group?

14 (No response.)

15 Thank you very much. I guess now we will have 16 the B&W group with the last opportunity.

17 MR. SHORT: I'm Barry Short from B&W, and I am 18 here to represent the B&W owners group at the request of 19 Mr. Lee Pacino. Lee regrets that he couldn't be here 20 today but he had some unexpected business come up at the 21 last minute. So he asked me to just cover a few points 22 here for you.

I'm going to keep my comments brief, also.
(Slide.)
What I want to do is cover three areas. Give

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1 you an idea of what the B&W owners group is doing with 2 the thermal shock program, give you a few comments. I 3 have one slide on the first one and four slides on some 4 general comments on the staff's draft report, and then I 5 have a concluding slide that will give you an indication 6 of where the B&W owners group is going to go from here. 7 (Slide.)

8 I guess a most of you know, the BEW has been 9 involved in this issue for quite a while, and what we 10 have done is we have issued some generic reports back in 11 1980. They are basically discussed in the staff's draft 12 report. There is a BEW 1628 and BEW 1648. They are 13 generic reports back in 1980, and they concluded that if 14 you do a generic analysis, first of all, it's 15 unrealistic and you can see some imminent problems in 16 the future.

At that time or shortly thereafter, we started some plant-specific analyses and in fact, we had planned just prior to the staff issuing their August 21st letter to do the plant-specific analyses. The August 21st letter kind of target Oconee-1 and GPU, TMI-1, so we were already doing those plant-specific analyses and basically concluded that those two plants are acceptable of the thermal shock issue.

Now, in the process of going from generic to

25

1 plant specific we learned a lot. In fact, in that 2 process -- well, I guess we've always known the small 3 break LOCA was a limiting event, but if you can solve 4 that problem you may end up with a different limiting 5 event, so you can't just pick small break LOCA and say 6 that's what your problem is.

7 Between the Duke Power Company and the GPU 8 analysis, we learned a lot about mixing, and that 9 report, the TMI-1 report. We have used a COMEX code 10 mixing analysis which shows guite a bit of margin for 11 the small break LOCA analysis, or small break LOCA 12 transient.

Those plant-specific reports were submitted hock in early 82 for Duke Power and July of 82 for GPU, sand basically, the two owners are waiting for the staff's review of that in detail. And as a result of that, the other plants have told us to just put severything else on hold. So in this regard, nothing else is being done by the B&W owners group as far as plant-specific analysis.

21 Let me just comment. I have four overheads 22 here to comment on the staff's draft report.

23 (Slide.)

In general, it is a very comprehensivereport. I think they have done an admirable job of

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1 putting everything in one place. I do have some 2 specific comments.

Like I said, first on the approach, we acree that the screening criterion is an acceptable way of targeting to determine when or if plant-specific analyses should be performed. However, you've got to watch out for a couple of things, and I just want to get a couple of points across here.

9 We do believe that the values are 10 conservative, and that is based on what we know today. 11 One of the key things that we've got to keep in mind is 12 that we should, in my opinion and several of the other 13 owners, we shouldn't establish a limit for RT NDT today 14 and not be flexible. So flexibility is a key point here 15 because we know that even in the past year things have 16 changed. We have seen it go from where we have only 17 had, say, two or three years left and now we've got 18 maybe four or five years. B&W analyses show that you've 19 got somewhere beyond 30 years.

20 So I think technology is going to advance. We 21 have seen examples of that in the mixing area. We know 22 that fracture toughness is being worked on. Elastic 23 plastic techniques. And we also know that experience 24 enters into this.

25 The staff is using a rather limited experience

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1 base, but as time goes on, that experience base is going 2 to change. And if we really believe we have told the 3 operators to watch out for the certain type of events, 4 hopefully in the future, we're not going to see any 5 operator errors. So flexiblity is a key that I think we 6 ought to be considering.

7 Somewhere -- I guess it's in Chapter 10 or 8 maybe the recommendations -- it says the RT NDTs must be 9 calculated, or should be calculated, in accordance with 10 the way it is shown in Appendix E, or whatever it is. 11 I'm not really sure. But again, in the lines of 12 flexibility, if there are other ways of calculating RT 13 NDT and the B&W owners group is working on some of this, 14 we shouldn't close our minds to that.

15 So screening criterion is an okay way to go, 16 but let's be flexible about it. In a couple of years we 17 may have a new criterion. Maybe it is 300 for 18 longitudinal, maybe 350 for circumferential. We don't 19 know.

Item 2 suggests that the staff maybe just clarify what their sequence of events are, and this I think is on page 1.4. Or maybe it's 4.1. Screening criterion is acceptable. You move from that into a plant-specific evaluation. Depending upon what you find that plant-specific evaluation will determine what

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1 you do next. Plant modifications may or may not be 2 required. There should be a three-step process here, as 3 opposed to a two-step process.

4 Third, we talk about -- I guess it's talked 5 about <sup>1</sup> the report, -- a technical basis for if you 6 have to do a plant-specific analysis, you have to have a 7 technical basis for the remainder of the plant's life, 8 and I think basically, this issue of thermal shock is a 9 reactor vessel integrity issue, much like the issues 10 that Appendix G of 10 CFR 50 already talk about. And I 11 think the goal there is to make sure we stay ahead of it.

12 If a plant-specific evaluation can show that 13 this plant has no problem for 20 years and the plant is 14 at five years now, that may be acceptable. That plant 15 may not want to make modifications yet. I think that is 16 the philosophy behind Appendix G.

I know the staff has referenced Appendix G 18 several times in their report. I think it is a pretty 19 smart philosophy. It is kind of tied in with keeping 20 flexible and making sure that you watch out as 21 technology advances that you are ready to make the 22 changes as appropriate.

23 (Slide.)

As far as acceptance criteria goes, I had a 25 problem when I was reading the report add I wasn't quite

1 sure what failure was. It is talked about several times 2 as being no crack initiation. Very extensively it went 3 into crack arrest There were safety goals that talked 4 about radiation releases, core melts or whatever. I did 5 not get a clear impression -- and this was relayed to me 6 by a couple of other owners, also -- of what the 7 criterion was when the RT NDT of 270 was calculated. 8 The word "failure" is used. I think maybe that ought to 9 be clarified

I think it was no initiation of crack, but as I got further along I am not quite sure if it wasn't arrest. It doesn't really matter, I guess, as long as I we know what it is.

And secondly here, the point that Steve made this morning, one of the key things, and one of the reasons why the B&W owners have put the plant-specific reasons on hold, is that we don't have an agreed-upon acceptance criterion. We shouldn't waste time doing plant-specific analyses without knowing what o is going to be acceptable. And like I say, that is one of the main reasons why the rest of the B&W plants are on hold right now.

23 MR. BENDER: There is something illogical 24 about that statement. It generally follows that people 25 do some analyses before they try to set acceptance

1 criteria in order to get some understanding of 2 uncertainties or how to allow for them, what options are 3 available.

I think essentially what you are suggesting is that the NRC staff go back to its old generic basis. I find that very discomforting, and if the position which the BEW owners group is taking is that the staff has to have arbitrary criteria before it will do any work, I think we bught to make the criteria very conservative in order to make sure the work starts early. What's wrong with that logic?

12 MR. SHORT: Let me explain what I meant by 13 that. The B&W owners group has already submitted two 14 plant-specific analyses. We have a criterion in there, 15 and that is the criterion that we have used. And based 16 upon those analyses extrapolating, if you will, to the 17 other B&W plants, we don't see that there's going to be 18 any problem even with the other plants.

19 What we would like to see is we would like to 20 see some kind of evaluation done of the acceptance 21 criteria that we have chosen prior to the staff --

22 MR. THEOFALOUS: What have you chosen? 23 MR. SHORT: We chose in those two reports 24 within one guarter of the thickness of the vessel wall 25 crack arrest. And for a regulatory purpose, that may be

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1 acceptable.

I guess what I'm saying is we want to get some feedback on those reports. It's not that you sit by and don't do anything. We have done something, and for that reason, the other reports are on hold. I don't know if that answers your guestion.

7 MR. BENDER: In addition to submitting the 8 reports, was there a specific request for a critique of 9 items within the report? Or did you just send the 10 report in and say, what do you think of this?

MR. SHORT: I don't know if you've seen the reports, but the reports cover everything. We've related to pressurized thermal shock. Everything we know today.

15 MR. BENDER: Are they more comprehensive than 16 those which the staff preparel?

17 MR. SHORT: Do you mean the draft report?
18 MR. BENDER: The draft report, yes.

19 MR. SHORT: I commended the staff for being in 20 such agreement with what we have. Yes. They have 21 covered every area. I see nothing left out. We did not 22 go quite as extensively into the probabilistic or safety 23 goal area.

24 MR. BENDER: Do you think that is unimportant?
25 MR. SHORT: I think in the future -- I think

ALDERSON REPORTING COMPANY, INC. 400 VIRGINIA AVE., S.W., WASHINGTON, D.C. 20024 (202) 554-2345 1 if you can show that you've got, with nominal

2 calculations, 30 or 40 years on a plant today, granted 3 there are a lot of uncertainties, but it certainly tells 4 you that there is a margin there.

5 In one of my later slides I'm going to show 6 you what the B&W owners are planning to do now. It's 7 not like we're sticking our heads in the sand.

8 MR. BENDER: Well, why don't you go ahead with 9 the remainder?

10 (Slide.)

11 MR. SHORT: I just want to continue some 12 comments here, looking at the applicability of the 13 methodology and the results. As we have been hearing 14 all day, the results are based largely on a lot of input 15 from the Westinghouse owners group, and there are some 16 basic differences in the plants. I know this was talked 17 about earlier, and I have a couple of examples here. 18 The vent valves and the once-through steam generator.

And I guess what the B&W owners group would comment on is the significance of those differences ought to be at least evaluated before the report is considered a final report. And I thick they've got that. The staff has as a recommendation in Section 10, so I would agree with that.

25 (Slide.)

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1 My last of the general comments on the report 2 is on timing. I know we talked a little bit about this 3 today as well. I think it might need some 4 clarification, and I think maybe some other people are 5 thinking along the same line. If we go ahead and begin 6 plant-specific evaluations three years prior to 7 exceeding some criteria, that's fine, we have no problem 8 with that.

9 Somehow, though, that report must be accepted 10 by the staff at some point in time because someone has 11 to make a judgment on what those plant-specific 12 evaluations are; if they are good or bad. And that is a 13 time factor that is missing. And I would say maybe a 14 year ahead of time. I don't know.

Based upon our experience, we have had the Based upon our experience, we have had the Staff reviewing the Oconee and GPU report or the TMI report, and maybe a year is good enough. I don't know. B I think it is something that is missing as far as timing goes.

20 MR. BENDER: Well, have you thought about what 21 you might have to do in the course of that year in order 22 to avoid being shut down? Do you expect the staff to 23 think that out for you, or are yu going to do it 24 yourself?

25 KR. SHORT: If you do a report three years

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1 ahead of time and the report comes out and says hey, I'm
2 good for 30 years and you submit it, --

MR. SHEWMON: Maybe no news is good news. You don't understand what I'm saying. I mean, the staff 5 obviously is worrying about PIS. If they aren't on your 6 back maybe it is because they figure somebody else has 7 more of a problem than you do.

8 MR. SHORT: That could be. We have suggested 9 just adding a column, which I saw was added earlier 10 today, just talking about calendar years and not 11 effective full power years. And I saw that that column 12 was added in Steve's presentation this morning. Not 13 exactly as it is labeled here, but the column was there.

14 (Slide.)

15 My last glide talks about where do we go now. 16 And as I mentioned before, the remainder of the B&W 17 plants are on hold. We're trying to just find out 18 whether it's acceptable or unacceptable.

19 The B&W owners are continuing with their 20 reactor vessel materials program. This is a program 21 geared to find out as much as we can about the reactor 22 vessel. It has several phases to it. The phases talk 23 about the actual chemistries, the RT NDTs, the actual 24 fracture toughness, enhanced ISI techniques and also, in 25 the dosimetry area which is also an important area.

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And then I just want to conclude with a couple of statements here that Table P-1 at the end of the report, it was suggested to me that -- I think the statement was made here that the staff get the values of RT NDT from the licensees. I believe that is one of the recommendations of Section 10, Number 4. Moving back to what I suggested before is that screening criteria is fine, but as we learn more and more about it, maybe we should be a little flexible with it, and a few years from now that criterion may change up or down as we know in more.

Again, the B&W owners, we have basic Again, the B&W owners, we have basic Adifferences in the reactors, and I think they were Acknowledged in the report, in Section 10. I guess to there is something that is being looked at in that area. And the last comment, I guess, is that again I to think the staff's report is good and very comprehensive. I think the approach is good. I have suggested a couple of areas to be clarified here, and I to think maybe a little bit more time -- we we only had about a week to look at this thing -- a little bit more time might be appropriate to get some more detailed comments. That is all I want to say, and I will answer any questions.

MR. BENDER: Are there any questions?

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1 (No response.)

2 MR. BENDER: I would like to pose a couple. I 3 think we have not seen from the BEW Owners Group an 4 assessment of operator actions and the diagnostic 5 information that is needed to make sure that the 6 operator actions are the correct ones to avoid 7 pressurized thermal shock. Is there a study of how the 8 operators will respond, what kind of symptoms they have 9 available to them, and some kind of emergency guidelines 10 that are understandable to the operators?

11 The last time I heard somebody discuss this, 12 it was pretty much the operator's judgment as to which 13 way to move.

14 MR. SHORT: I am not sure if you are familiar15 with the B&W ATOG program.

16 MR. BENDER: I can say I am not familiar with17 it.

18 MR. SHORT: It is a program that has been 19 under way ever since TMI, and it is addressing the 20 issues of thermal shock. There have been guidelines 21 issued to all of the BEW utilities. I think the closest 22 thing that could come to what you are looking for is 23 simulator training.

24 MR. BENDER: Well, that is not very good 25 unless the simulators are capable of simulating the kind

1 of conditions that we have expressed concern for. I am 2 not convinced that the B&W Owners Group has really taken 3 the problem as seriously as they ought to take it, and I 4 think the fact that you are giving the kind of answers 5 you are giving to what seems to be a crucial issue of 6 operator behavior suggests that you ought to go back and 7 give some more thought to the problem.

8 I personally would like to see a much more 9 positive response than just, we think maybe simulator 10 behavior is the right way to study this thing. I still 11 have doubts about whether the simulators are capable 12 of simulating the situation.

13 MR. SHORT: We don't want to have any actual 14 PTS events. What I am saying is that the owners have 15 recognized this for quite a while, the B&W owners. They 16 do have an active ATOS program under way.

17 MR. BENDER: Isn't it true that the 30-year 18 presumption you have on life is very much dependent upon 19 operators doing certain things in a certain way?

20 MR. SHORT: Yes. We do take credit for 21 operator action.

MR. BENDER: And if I were to take issue with a your assumptions, I might prove that the 30 years is a more like three. If that were the case, what would you to do?

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MR. SHORT: Well, I don't think that is the 2 case, but if you could prove it --

3 MR. BENDER: I understand that.

4 MR. SHORT: If you could prove it, I would 5 like to know how.

6 MR. BENDER: Well, there is a lot of 7 subjective judgment in this business.

8 MR. SHORT: There are a lot of uncertainties, 9 and we came up with a list one time that was almost 20 10 areas of potential uncertainty, and one of the reasons 11 why we are talking here so long about it, I guess, is 12 because if you go worst case in every one of those 13 areas, you get yourself into a problem, and we have done 14 that, and so I am not standing back and saying we 15 haven't done it. We have done that.

16 NR. SHEWMON: Sir, one of the other reasons we 17 are here is that B&W plants are real hot-shot items, and 18 they have generated enough of these events so that we 19 realize it is a problem. So maybe they are a lot better 20 than they used to be, but we are here because of P&W 21 plants to a fair degree.

Now, you come out looking good by the staff's current criteria, but your reactors don't, or your automatic control systems don't, and maybe you can handle them now, and you've got your operators trained

1 to where they can, but it is not immediately obvious, 2 given the past experience.

3 MR. BENDER: Well, let's not overreact to the 4 statements we are making. I guess my reaction is to 5 say, you are pretty blase about the whole thing, and it 6 is discomforting to hear it presented that way. Perhaps 7 we have misinterpreted the view, but I think, just 8 speaking for myself, I would be happier to see a more 9 positive kind of attitude rather than one which says, 10 look, we have shown there is 30-year life in this plant, 11 go away and leave us alone.

12 MR. SHORT: That is not the attitude, and I 13 didn't want to get that across. That is why I showed 14 the last slide, that we were doing things actively to 15 stay ahead of the issue. This is not the only vessel 16 integrity concern, and I think there has been a lot of 17 thought that has gone into it, and I think the BEW 18 owners are taking it seriously.

MR. BENDER: Thank you. Are there questions?
(No response.)

21 MR. BENDER: Does the working group have any 22 other thoughts, or would the staff like to add 23 anything?

24 MR. HANAUER: Mr. Chairman, I wouldn't like to 25 add anything, but I would like to get either now or

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1 later some guidance on what you want in the full 2 committee meeting in October.

3 MR. BENDER: Well, that is a good thought. I 4 think the Committee was very well disposed toward the 5 presentation you made this morning, and while it might 6 not be necessary to present all of it, I think it would 7 be helpful if you would provide as condensed a version 8 as you could.

9 MR. HANAUER: Do you want the Committee to 10 hear either the Pacific Northwest or the Owners Groups?

MR. BENDER: Well, I was going to get to that point separately. I think we need some kind of story about the capabilities of a nondestructive examination presented in a way that is more explicit than we heard today, and one which speaks to what can be done about the existing vessels, and states explicitly what the nucertainties are associated with nondestructive semination.

19 With the knowledge we have of the vessels 20 today, I think that would probably be enough to 21 enlighten the Committee from the staff's point of view.

MR. ZUDANS: I think at that point it would be an important to analyze the state of vessel cladding and see which of these methods potentially could be used. Nobody knew what the state of cladding is.

MR. BENDER: What I am hoping is that the staff would be able to get somebody to tell us what they know and what else they can learn in the period of time between now and X, whatever that is. I think I will leave it to the discretion of the Owners Groups as to whether they would like to make a presentation.

Now, we have some time available for them.
MR. IGNE: We have three hours, and I think
9 Steve wanted two hours, and that left an hour for the
10 others.

MR. MCRRIS: I just want to make a comment. We do not have any, I believe need is the right word, to make a presentation at the full Committee meeting. I don't really see where it would serve any purpose for us unless it would help someone else.

16 MR. BENDER: My suggestion is, the Owners 17 Groups have representatives there to respond to 18 questions, but if they would like to make presentations, 19 we would allocate some time. Does anybody see a need 20 for another kind of presentation? If not, let me 21 suggest first that those consultants that feel like they 22 would like to hear this again, they are cordially 23 invited to attend the full Committee meeting, but what I 24 intend to do is to convey to the Committee the 25 collective recommendations that we have had, and

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1 hopefully they will be taken in the spirit of thought in 2 which they were developed, and they will be passed along 3 in an appropriate way.

4 MR. SHEWMON: Your criteria at this point in 5 time take no account of the kind of plant or the kind of 6 control system or the kind of experience? Is that true?

MR. HANAUER: That is quite correct.
MR. SHEWMON: Well, maybe at the full
Committee meeting we could discuss it further, then,
whether you think that properly reflects the effective
mass or whatever you use or the acceleratability of
these things.

MR. HANAUER: It does not. We just haven't
14 seen enough data to do anything different up to the
15 present time.

MR. SHEWMON: Thank you.

17 MR. BENDER: If there are no other comments,
18 this seems like a good time to adjourn this meeting. I
19 thank everyone for coming and contributing.

20 (Whereupon, at 4:45 p.m., the meeting was 21 adjourned.)

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## NUCLEAR REGULATORY COMMISSION

This is to certify that the attached proceedings before the

in the matter of: ACRS/Metal Components Working Group

· Date of Proceeding: September 30, 1982

Docket Number:

Place of Proceeding: Washington, D. C.

were held as herein appears, and that this is the original transcript thereof for the file of the Commission.

Ray Heer

Official Reporter (Typed)

Official Reporter (Signature)

PRESSURIZED THERMAL SHOCK PRESENTATION TO ACRS METAL COMPONENT SUBCOMMITTEE

SEPTEMBER 30, 1982

STEPHEN H. HANAUER

## OUTLINE

O GENERAL APPROACH

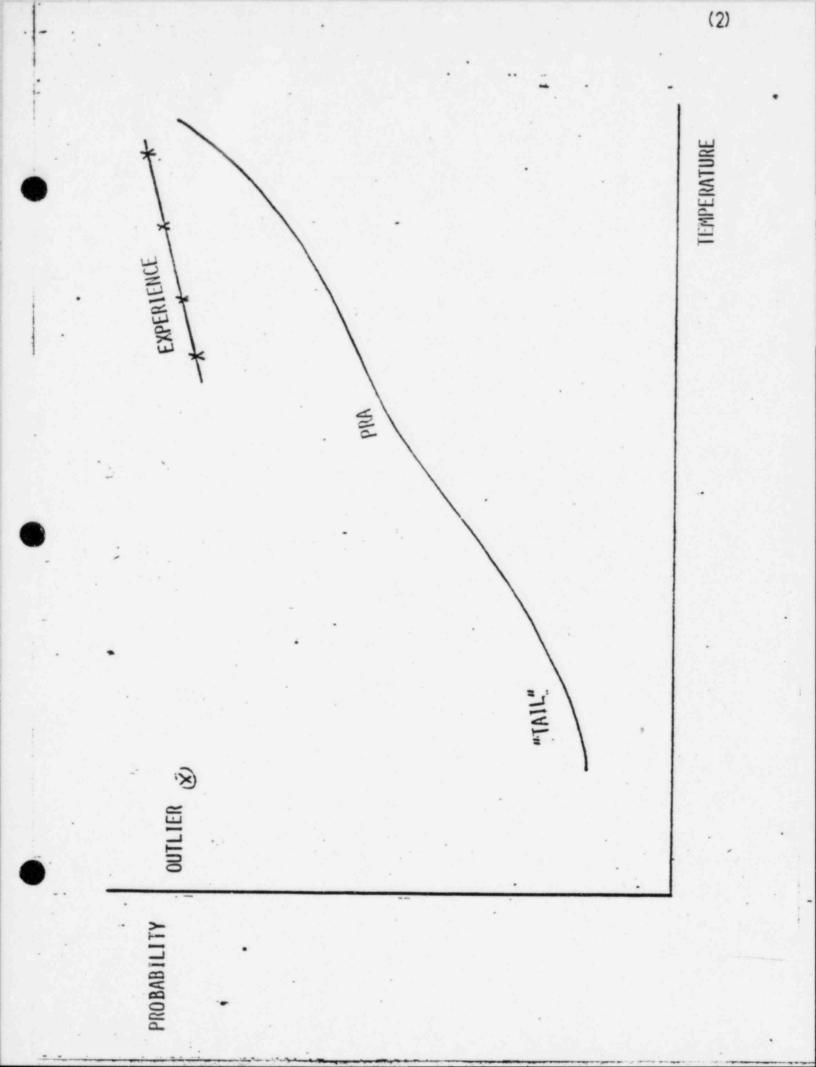
O EVALUATION OF EXPERIENCE

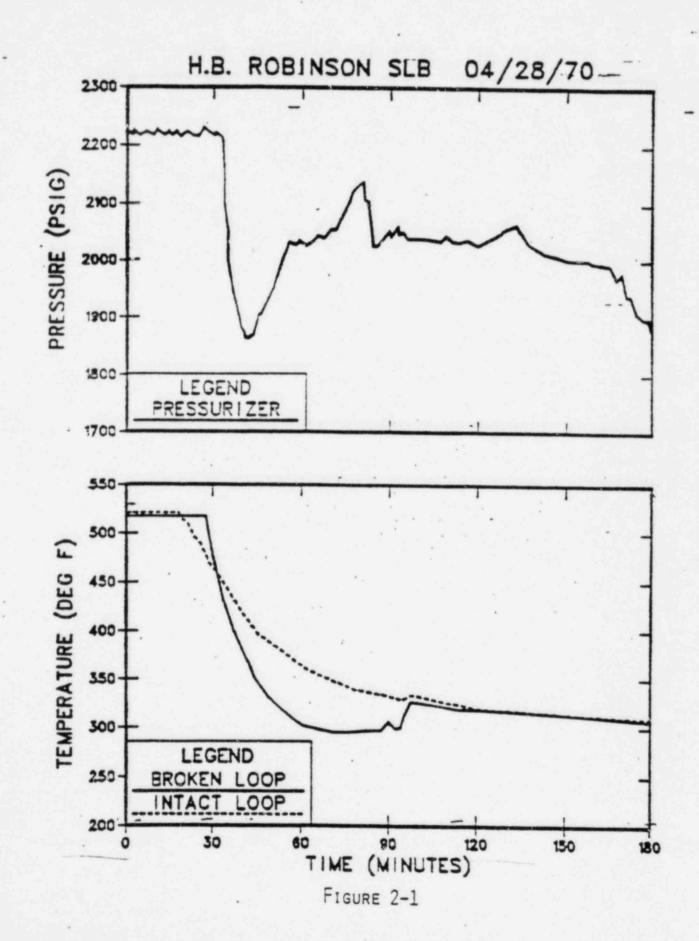
o SCREENING CRITERION

O APPLICATION TO PLANTS

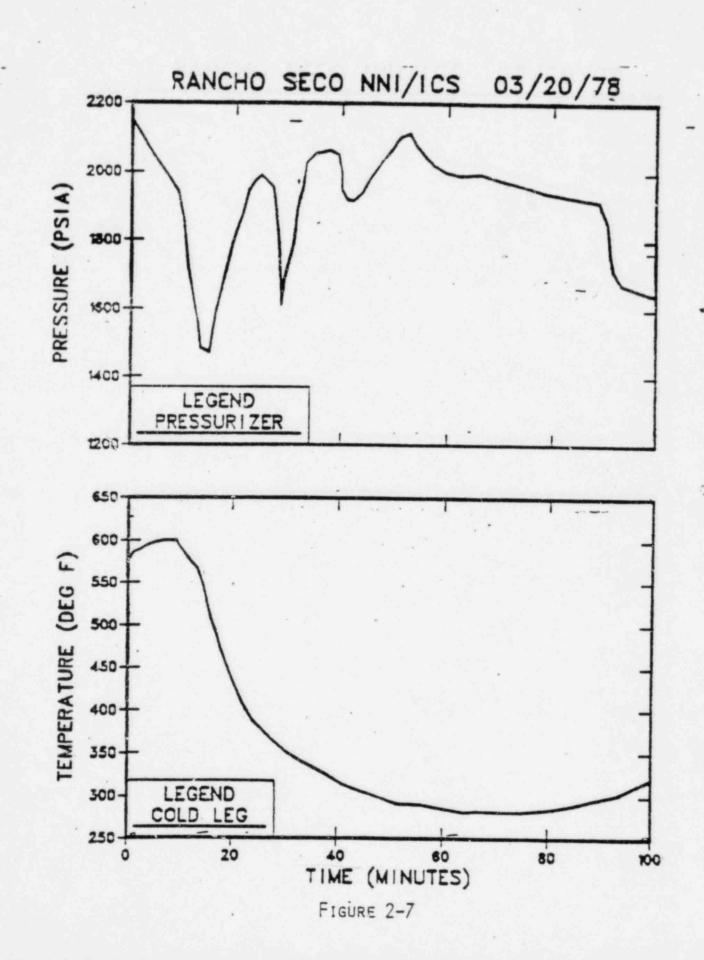
O PROBABILISTIC EVALUATION

O CONCLUSIONS AND RECOMMENDATIONS

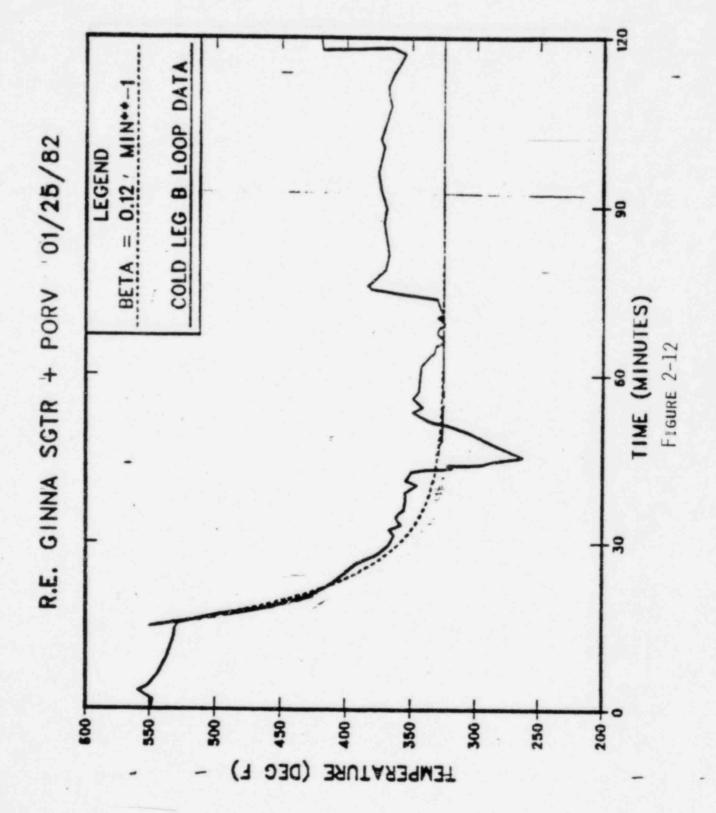




(3)

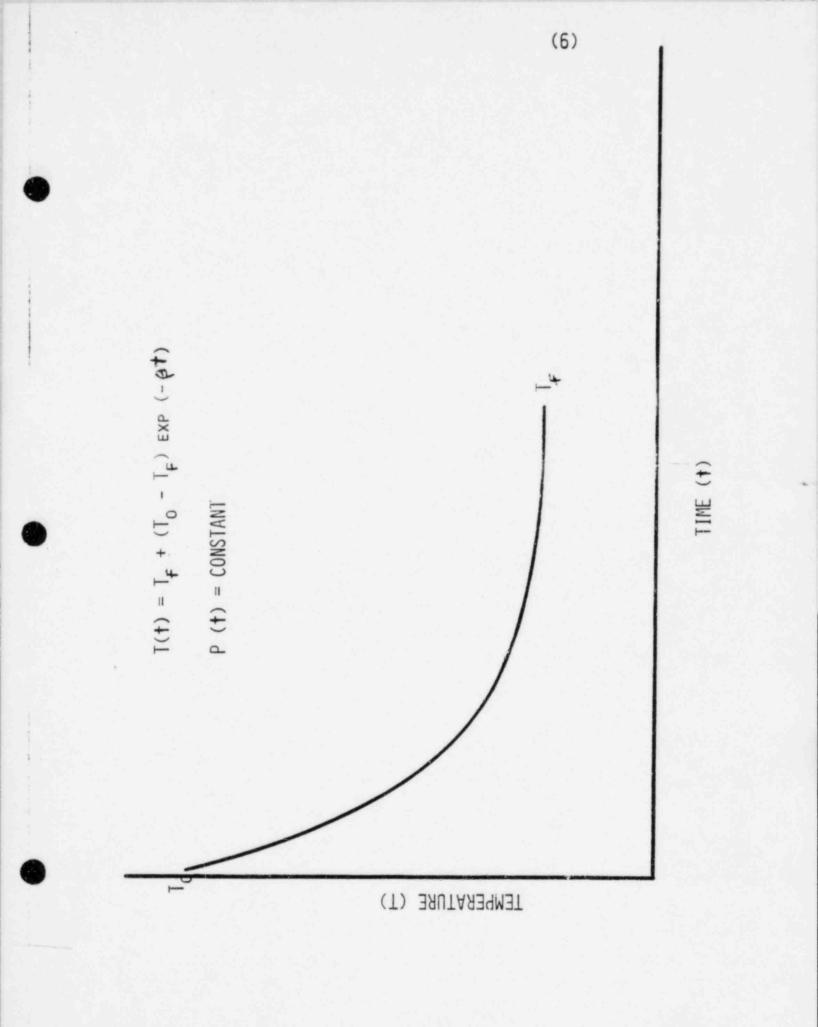


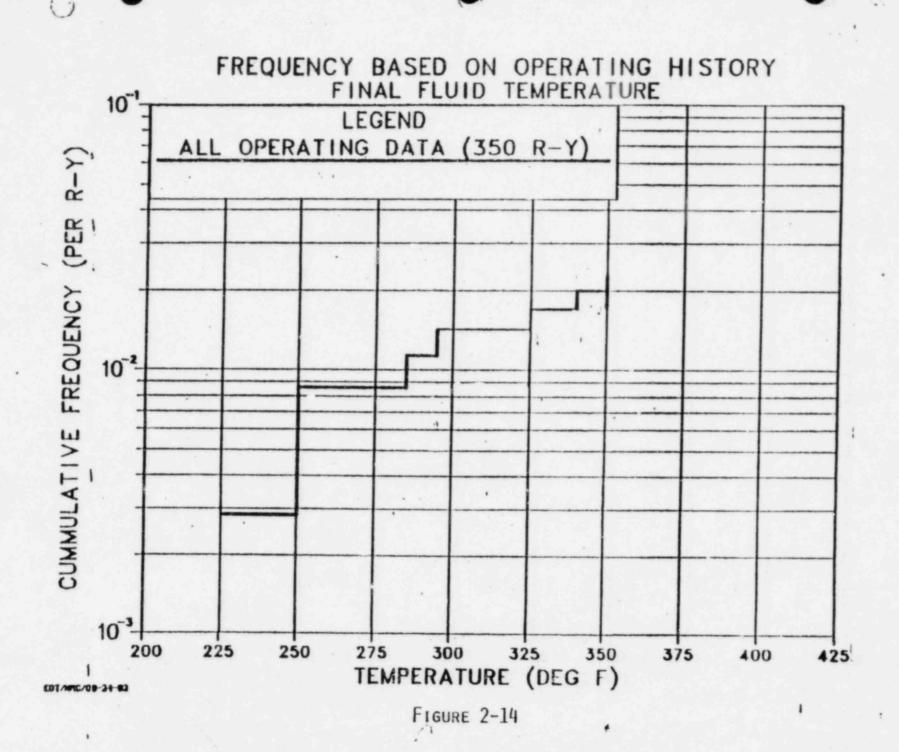
(4)



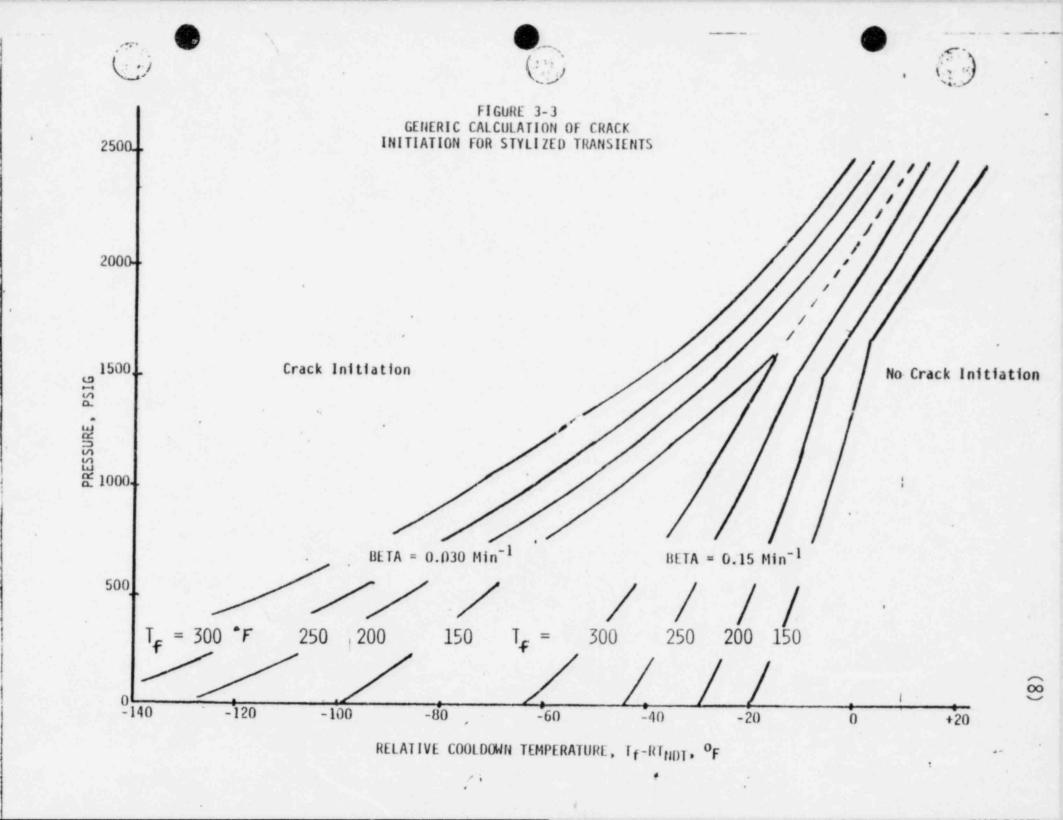
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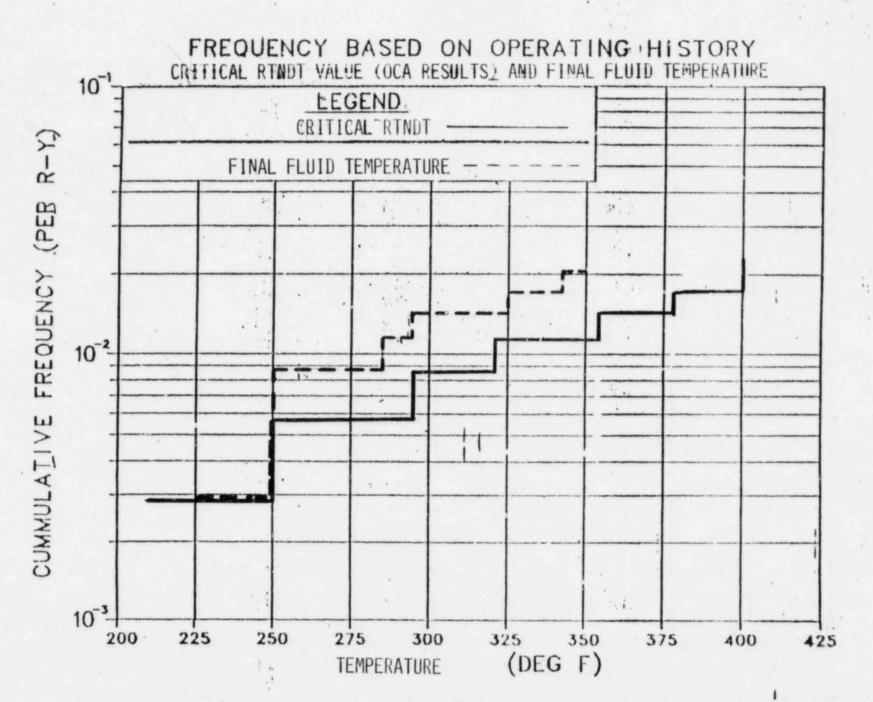
(5)





(7)





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FIGURE 4-1

(9)

(10)

SCREENING CRITERION

o LONGITUDINAL CRACK 270°F

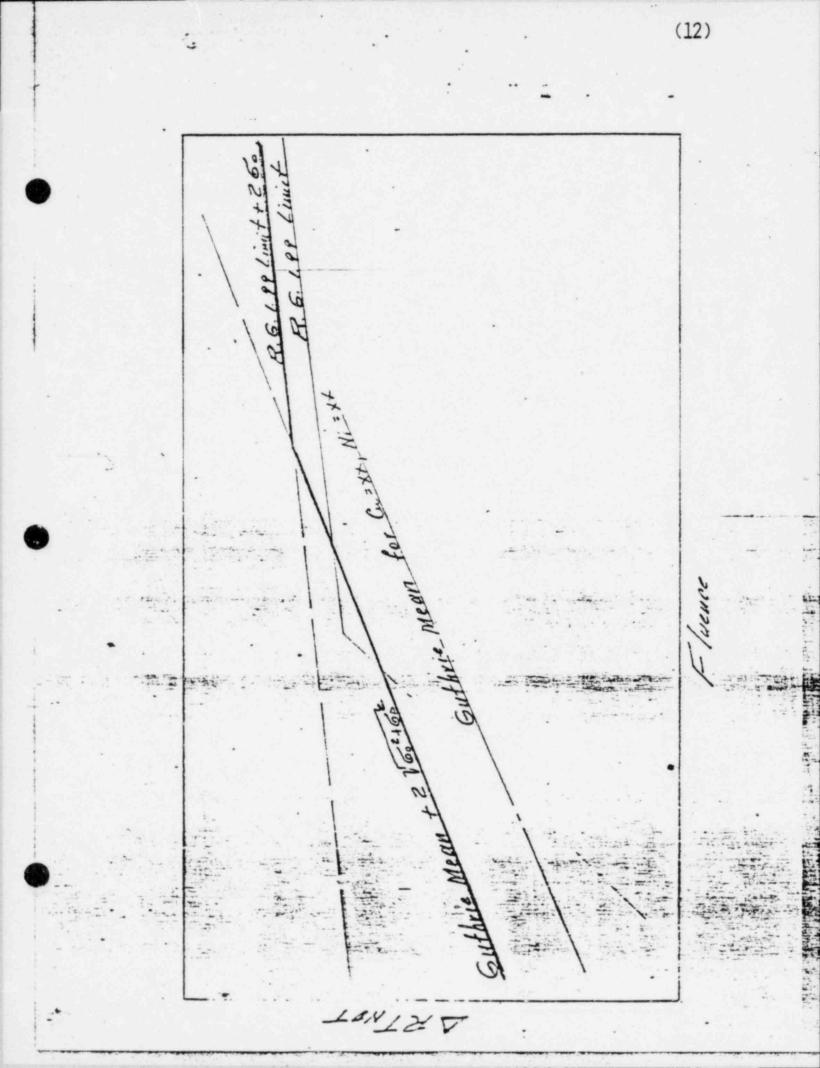
o CIRCUMFERENTIAL CRACK 300°F

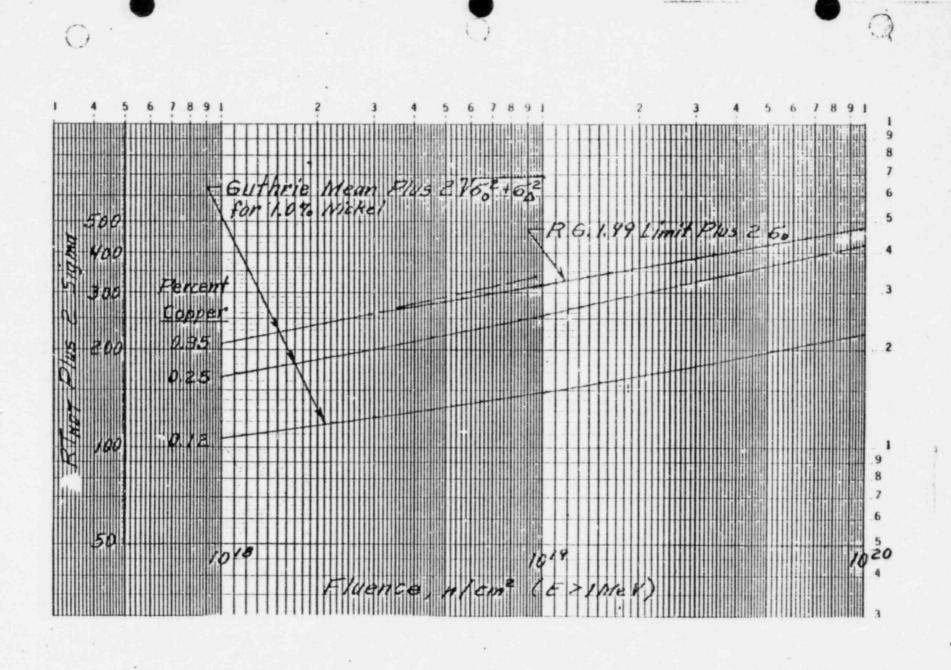


 $RT_{NDT} = RT_{O}$  (BEST ESTIMATE)

+  $\Delta RT$  (BEST ESTIMATE - GUTHRIE) +  $2\sqrt{\sigma_0^2 + \sigma_2^2}$ 

LIMITED BY RG 1.99 + 2To





EXAMPLE OF NRC PRESCRIPTION FOR RTNDT (FOR ASSUMED

RT<sub>NDT</sub> (o) OF 0<sup>O</sup>F)

(13)



	PLANT		As of	DECEMBE	DECEANBER 31, 1981
PLANT	RT of	ARTOF	2102+02	RTHDE	DATE SCREENING CRITERION EXCEEDED
RobiJSON 2 FUREUM	e E	295 ISI	* 5	281	Felnewy 1987
MUSALAUN SCIRCUM	-56	4; 2; 2;	34	244 4	. Aprie, 1990 !
CE/CE ANIAL	-SL	2000	34	259	8.351 ' Im
U/LEW NO AXIAL		200	Es	524	Birey, 1988
	15- 14	845	at M	705	C September 1995
CE/CE NUMBER OF ALIPE	15-1	258	34	314	
JEET CLIFFS CIRC	75 - 27	135	45	138	Potrin, 1989
INDAN POINT 3 CIRCUM	+21 ma	90	84 84	212	, December 7002
MULLE ROME CORRUS	105 H	133	\$ \$	21	Dunburze33

SIGNIFICANT PTS EVENT SEQUENCES

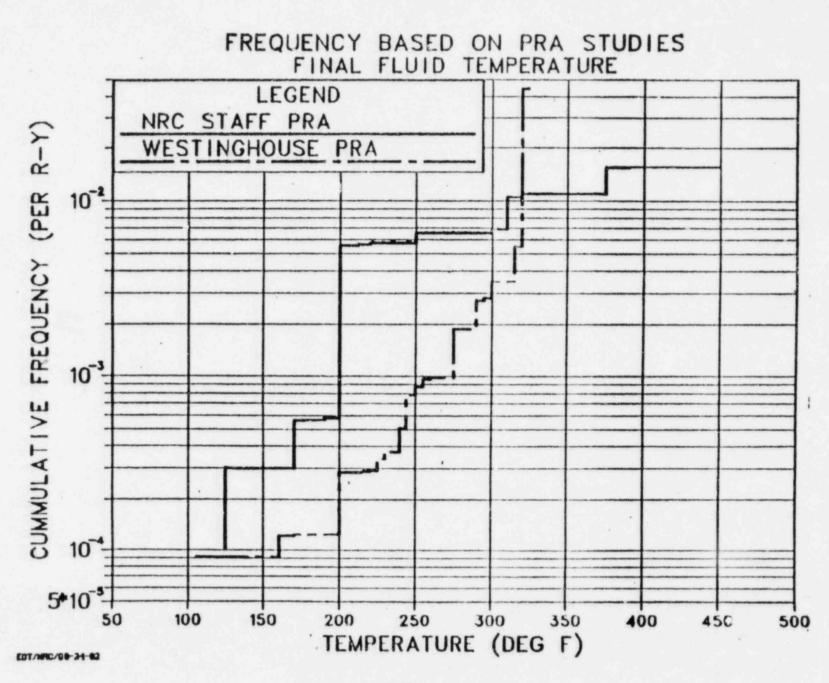
O SECONDARY (STEAM SIDE) DEPRESSURIZATION

O MAIN STEAM LINE BREAK

o SMALL STEAM LINE BREAK (OR STUCK OPEN STEAM GENERATOR SAFETY/RELIEF VALVE)

O SMALL BREAK LOSS-OF-COOLANT ACCIDENT

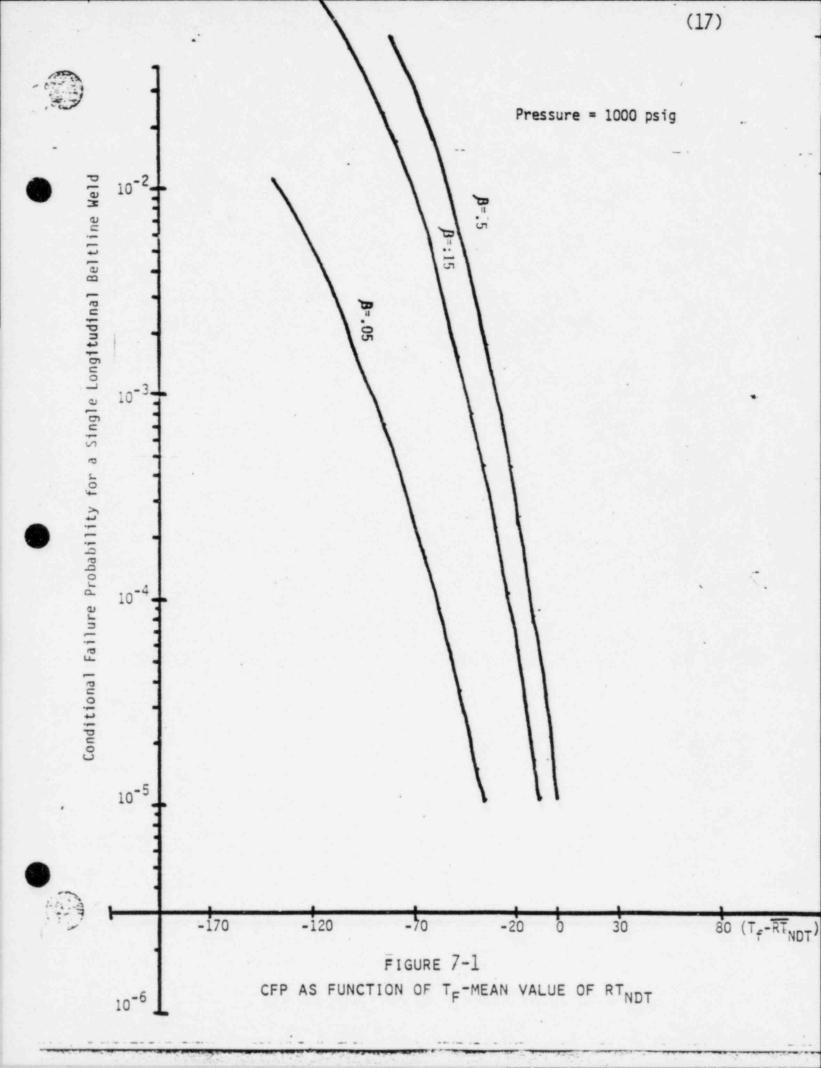
O STEAM GENERATOR TUBE RUPTURE

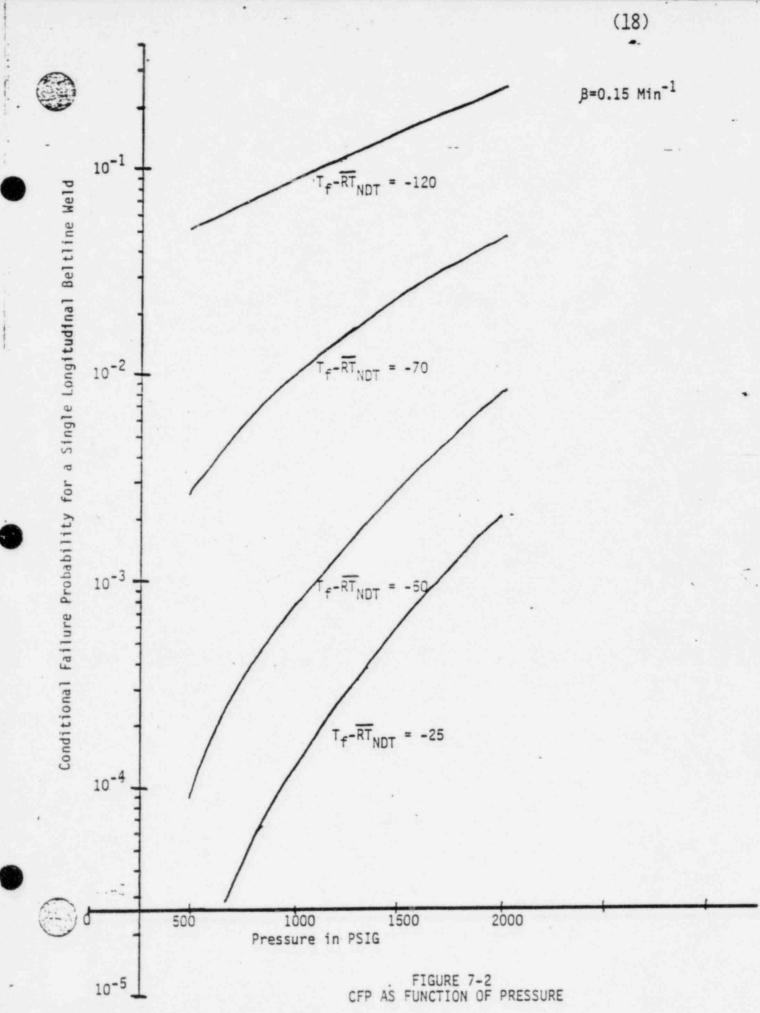


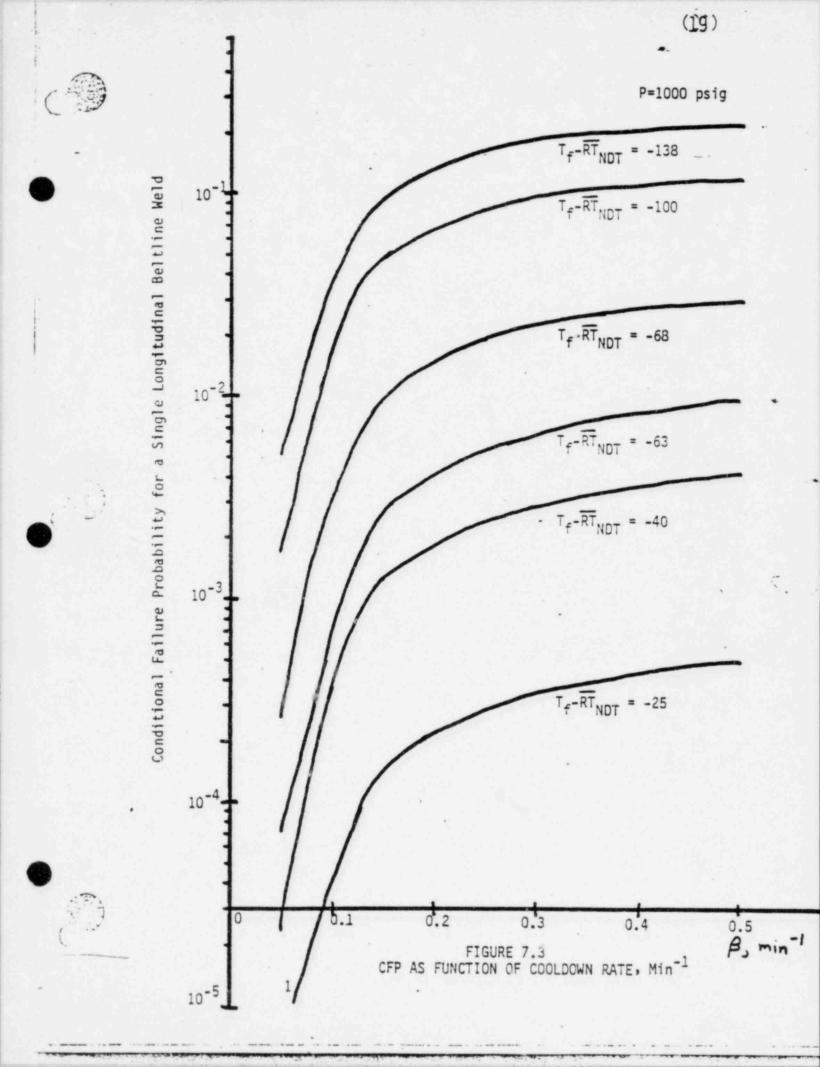
Ċ,

FIGURE 8-1

(16)







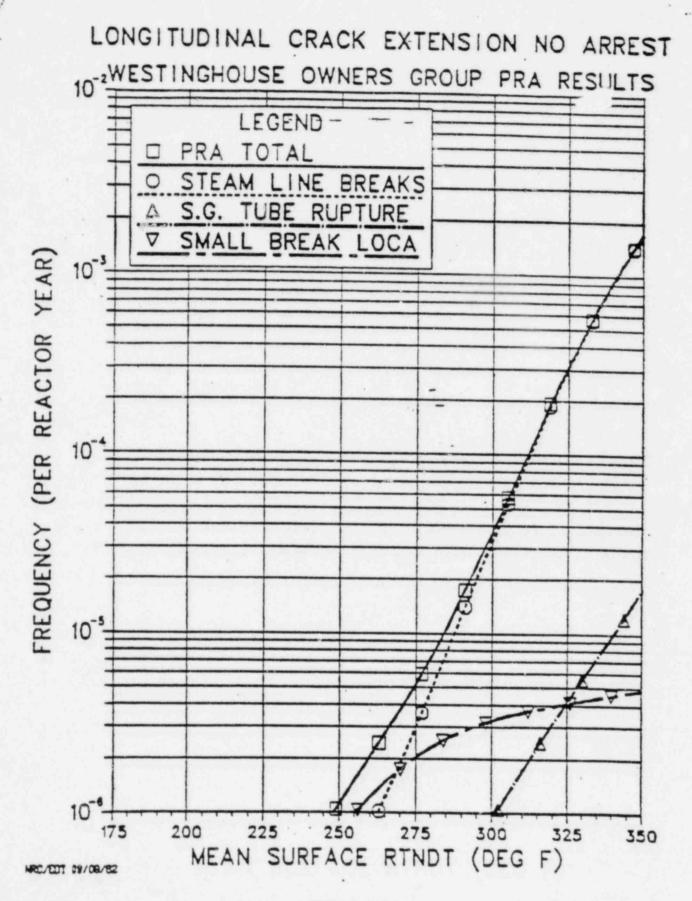
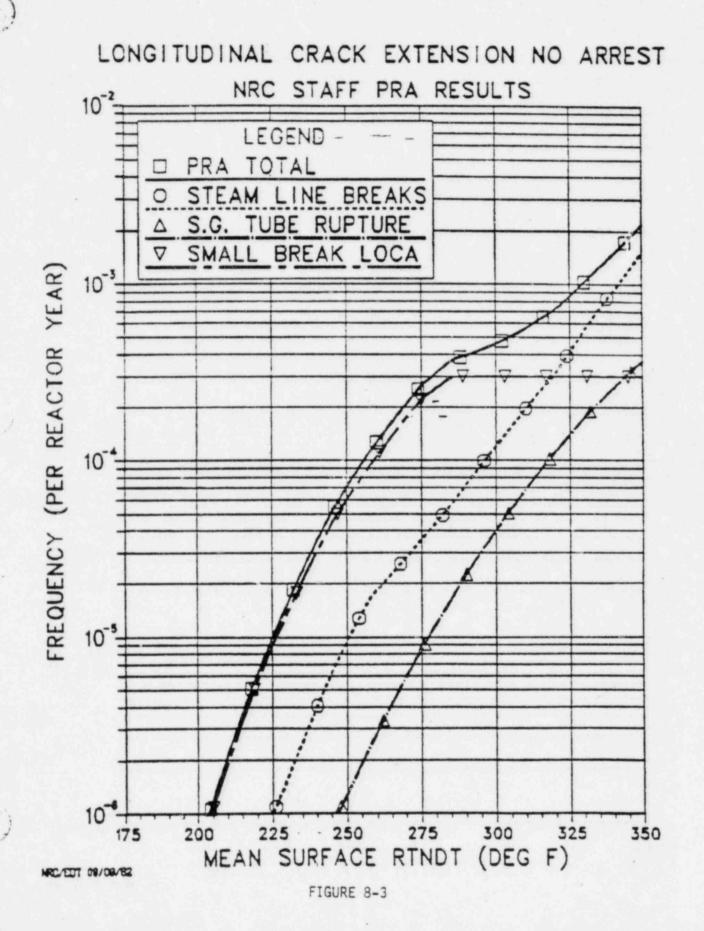


FIGURE 8-2

(20)



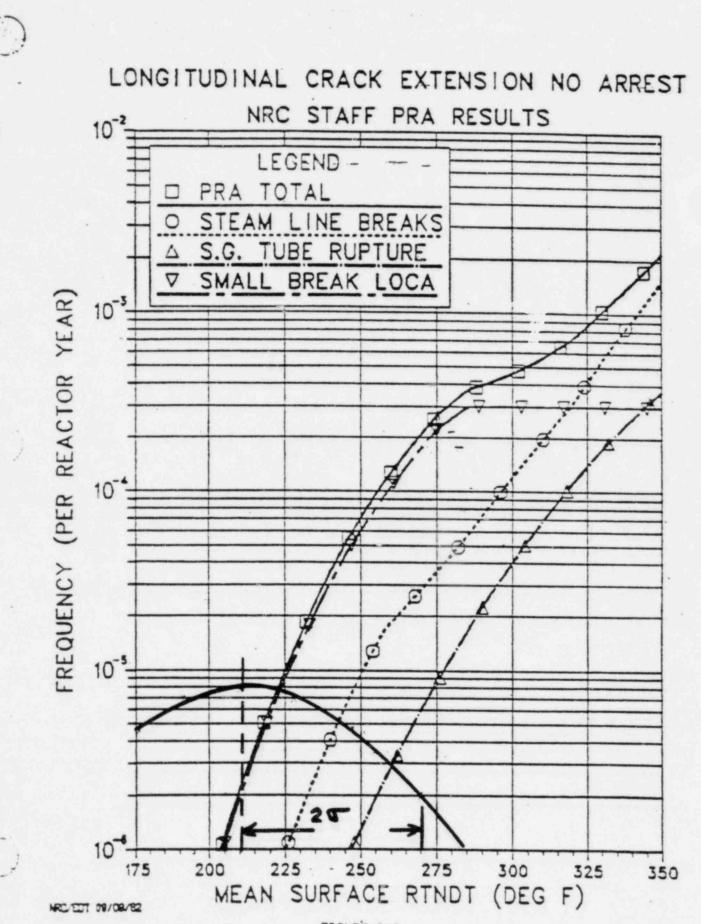


FIGURE 8-3

(22)

## SAFETY GOAL

FVESSEL CRACKXCORE MELT IF VESSEL CRACKSYSIGNIFICANT RELEASE IF CORE MELTSCORE MELT $XF \leq 10^{-5}$ RISK $XFY \leq 5 \times 10^{-8}$ 





## UNCERTAINTIES

O OPERATING EXPERIENCE

O OPERATION ACTIONS

O FLAWS AND CRACKS

o STRESSES

O MATERIAL PROPERTIES

o FRACTURE MECHANICS

O PROBABILISTIC CALCULATIONS

## SHORT TERM

1. NO NEED FOR IMMEDIATE ACTION

2. NEED PLANT-SPECIFIC ANALYSIS OF SELECTED PLANTS

3. SCREENING CRITERION

- 4. ACCEPTANCE CRITERIA FOR FUTURE PLANT-SPECIFIC ANALYSES ARE NEEDED
- 5. REGULATION CHANGES MAY BE NEEDED

### PLANT-SPECIFIC PTS EVALUATION

O EVALUATION OF OVERCOOLING EVENT SEQUENCES

O VESSEL MATERIALS PROPERTIES

O DETERMINISTIC FRACTURE MECHANICS EVALUATIONS

o FLUX REDUCTION PROGRAM

O INSERVICE INSPECTION AND NONDESTRUCTIVE EVALUATION PROGRAM

(26)

O PLANT MODIFICATIONS

- INSTRUMENTATION AND CONTROLS
- AUTOMATIC DEPRESSURIZATION LOGIC
- INCREASED EMERGENCY CORE COOLING WATER AND EMERGENCY FEEDWATER TEMPERATURES

O OPERATING PROCEDURES AND TRAINING PROGRAM IMPROVEMENTS

O IN-SITU ANNEALING

O BASIS FOR CONTINUED OPERATION

## LONG TERM

1. IMPROVE PROCEDURES AND TRAINING

2. IMPROVE AND EXTEND GENERIC ANALYSIS

O INDUSTRY AND NRC

O BETTER EVALUATION OF EXPERIENCE

o BETTER PROBABILISTIC ANALYSIS EXTEND TO B&W, CE

(27)

3. IMPROVE ISI OF HIGH RT<sub>NDT</sub> VESSELS

4. DECREASE LEAKAGE NEUTRON FLUX

## ACRS SUBCOMMITTEE MEETING 9-30-82

.

## PNL AGENDA

•	SUMMARY - NUREG/CR-2837 AND NRC PTS SCREENING CRITERION	L.	Τ.	PEDERSEN
	EVENTS AND THERMAL HYDRAULIC ISSUES	s.	н.	BIAN
•	MATERIAL PROPERTIES ISSUES	Ε.	Ρ.	SIMONEN
	FRACTURE MECHANICS ISSUES	F.	Α.	SIMONEN
•	NDE METHODOLOGY AND APPLICATION TO ISI	Τ.	т.	TAYLOR

## PNL Technical Review of Pressurized Thermal Shock Issues

Manuscript Completed: June 1982 Date Published: July 1982

Prepared by L.T. Pedersen, W.J. Apley, S.H. Bian, L.J. Defferding, M.H. Morgenstern, P.J. Pelto, E.P. Simonen, F.A. Simonen, D.L. Stevens, T.T. Taylor

Pacific Northwest Laboratory Richland, WA 99352

Prepared for Division of Safety Technology Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555 NRC FiN B2510



#### ACRS SUBCOMMITTEE MEETING 9-30-82

#### NUREG/CR-2837 RECOMMENDATIONS

- UPGRADE PROCEDURES, TRAINING AND CONTROL ROOM INSTRUMENTATION ON A SITE SPECIFIC BASIS IN THE NEAR- TO LONG-TERM PERIOD.
- DEVELOP UNIFORM CRITERIA FOR FUTURE ANALYSES USED TO EVALUATE THE EFFECTIVE FULL POWER YEARS (EFPY) REMAINING BEFORE FURTHER CORRECTIVE ACTIONS ARE REQUIRED.
- ADAPT IMPROVED NDE TECHNIQUES DURING FUTURE INSERVICE INSPECTIONS, ISI.

#### ACRS SUBCOMMITTEE MEETING 9-30-82

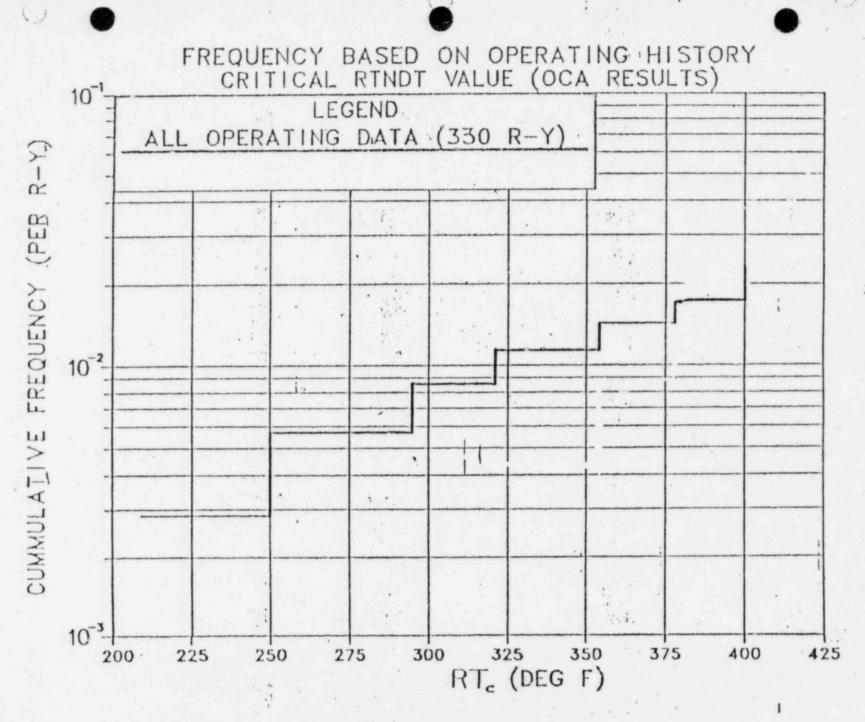
#### NRC SCREENING CRITERION

RTNDT FOR AXIAL WELDS - 270°F

RTNDT FOR CIRCUMFERENTIAL WELD - 300°F

BASIS

- FREQUENCY OF OCCURRENCE FROM OPERATING DATA ~10<sup>-2</sup>
- PROBABILITY OF CRACK EXTENSION ~10<sup>-6</sup>



2

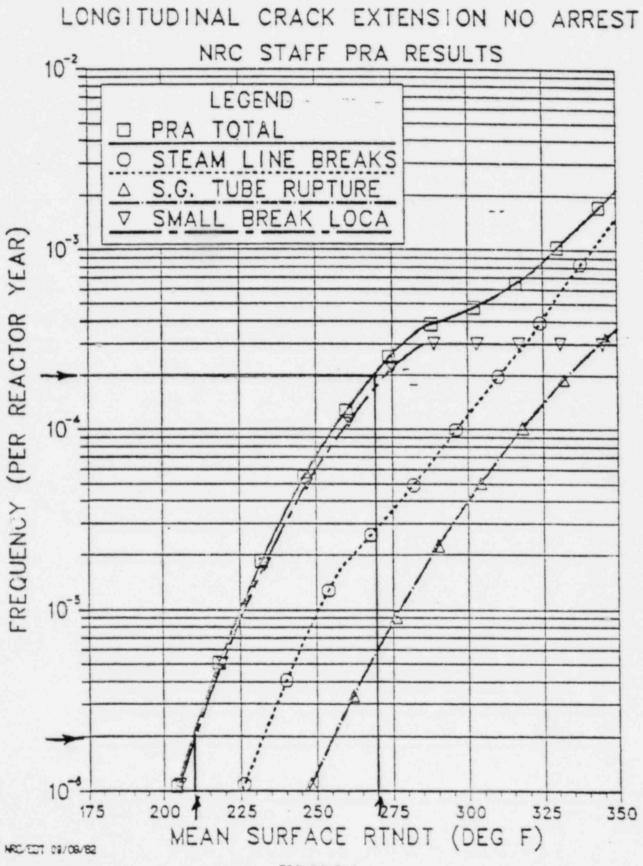
Figure 4-1

(5

12

DAF

DRAFT



1.0

FIGURE 8-3

DRAFT

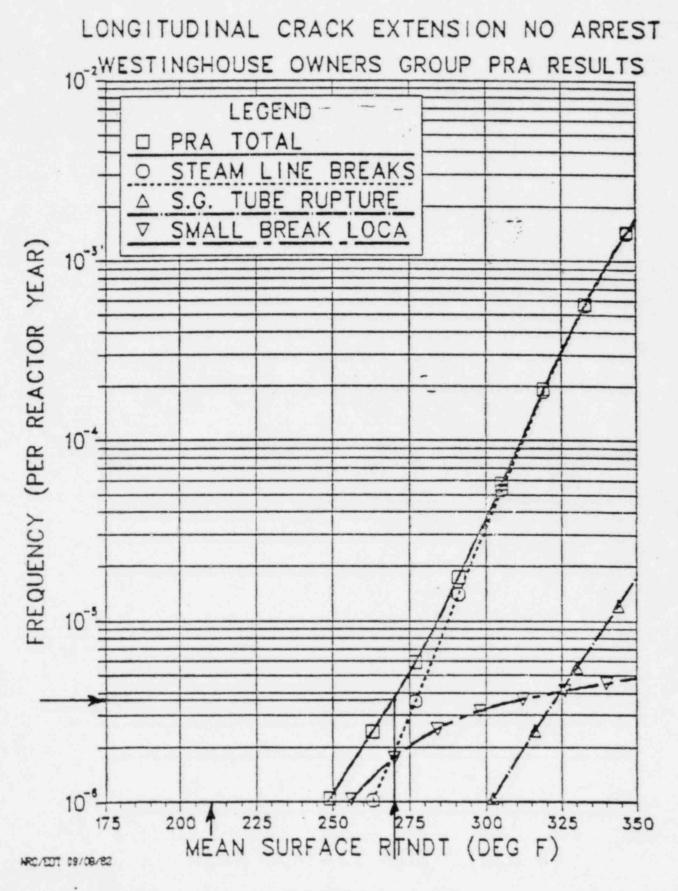
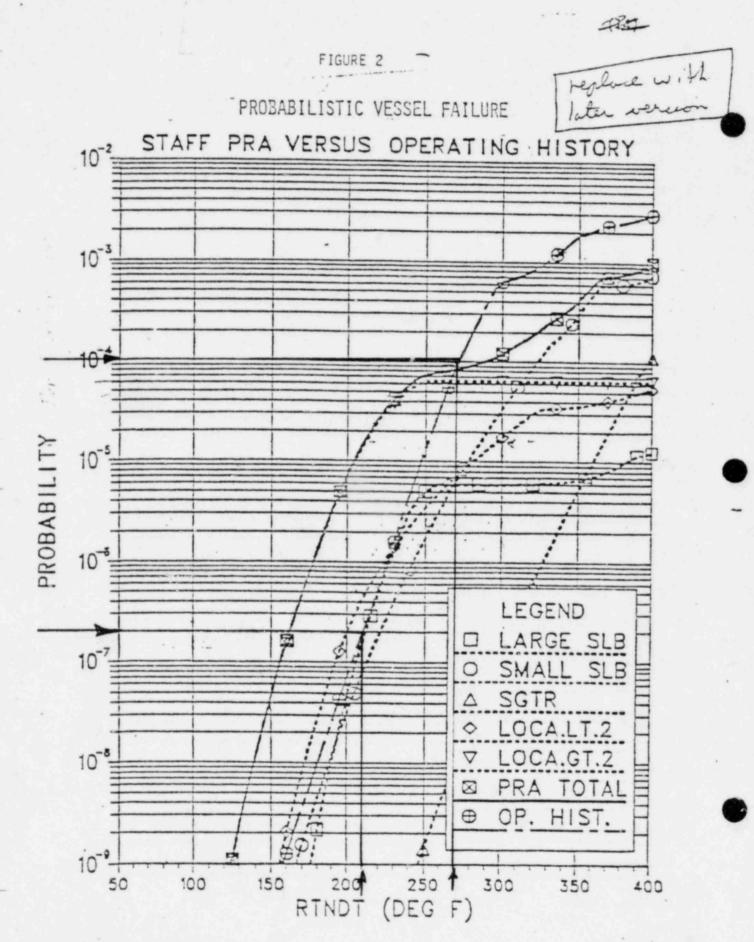


FIGURE 8-2



8/11/82

#### ACRS SUBCOMMITTEE MEETING 9-30-82

#### HOW IS PROBABILITY OF CRACK

### EXTENSION OF ≈10-6 SATISFIED

FROM DRAFT NRC STAFF EVALUATION OF PRESSURIZED THERMAL SHOCK, SEPTEMBER 13, 1982, PAGE 8-6.

1. PTS EVENT SEQUENCES LEADING TO RPV FAILURE HAVE OVERALL FREQUENCY F PER REACTOR-YEAR. FIGURES 8-2 AND 8-3 PROVIDE A VERY APPROXIMATE ESTIMATE OF F. A PLANT EVALUATED (AS DESCRIBED IN SECTION 5 OR 9 AND APPENDIX E) TO BE AT THE 270°F SCREENING CRITERION IS LIKELY TO HAVE A TRUE RTNDT OF 150-270°F (TWO SIGMA ≅60°F). FOR THE MEAN OF 210°F, F ≅10°6 PER REACTOR-YEAR ON THE NRC CURVE (FIGURE 8-3), AND MUCH SMALLER ON THE WOG CURVE (FIGURE 8-2).

### EVENTS AND THERMAL-HYDRAULIC ISSUES

- INITIATING EVENTS
  - · ESTIMATION OF FREQUENCIES.
  - · OPERATOR ACTION TIME ANSI STANDARD N660
- LOSS OF NATURAL CIRCULATION CONDITIONS LEADING TO IT NEED CLEAR DEFINITION (SITE-SPECIFIC)
- LOCAL MIXING IN DOWNCOMER

 HEATING ECC WATER - Very effective under stagnant flow condition, not effective and not critical if loop circulation is maintained. Further investigation needed on other effects (e.g., core cooling).

## LOCAL MIXING UNDER STAGNANT FLOW CONDITION

USING ENERGY BALANCE WITH WALL HEATING:

$$T = (T_0 - T_r) EXP (-\beta t) + T_r$$

 $H_F = H_{HPI} + \frac{\dot{0}''A}{W_{HPI}}$ 

(ENTHALPY AT 50 MINUTES INTO TRANSIENT IS TAKEN AS FINAL ENTHALPY)

$$T_F = F (H_F, P_{SYS})$$

$$\beta = \frac{W_{HPI}}{M}$$

## LOCAL MIXING UNDER STAGNANT FLOW CONDITION

RESULTS:

PNL: T<sub>F</sub> = 136 °F B=0,13 (14 4-LOOP)

NRC:  $T_{F} = 125^{\circ}F$   $\beta = 0.12$ 

## DOWNCOMER TEMPERATURE VS. ECC TEMPERATURE

 $T_F(^{\circ}F)^{*}$ T<sub>HPI</sub>(°F) 

\* FOR W 4-LOOP STAGMANT FLOW

# MATERIAL PROPERTIES ISSUES PNL ASSESSMENT (9/30/82)

\*VARIABILITY JUSTIFIES CONSERVATISMS

\*STATISTICAL TREND CURVES RECOMMENDED

\*TESTING TO ENHANCE TREND CURVES

(DEVELOPMENT AND APPLICATION)





## STATISTICAL TREND CURVES RECOMMENDED

\*BENEFITS OF STATISTICAL CURVES -DESCRIBE ALL DATA -INSENSITIVE TO NEW DATA \*LEAST CONSERVATIVE AT EXTREMES -HIGH Cu. Ni.FLUENCE IS 6% OF DATA (Cu>. 3) (Ni>. 5) (F>5e18) -WORST FIVE PLANTS (HBR2/FC/TP4/TP3/MY)







## TESTING TO ENHANCE TREND CURVES

\*TREND CURVE DEVELOPMENT -SUBMICROSCOPIC CHARACTERIZATION (EFFECTIVE FOCUS ON PARAMETERS) (ADD CONFIDENCE IN MODEL) \*TREND CURVE APPLICATION -IN SITU CHARACTERIZATION OF VESSELS -REIRRADIATION EMBRITTLEMENT CRITIQUE OF FRACTURE MECHANICS AND STATISTICAL ISSUES

F. A. SIMONEN

SEPTEMBER 30, 1982

BATTELLE PACIFIC NORTHWEST LABORATORY



## ESSENTIAL QUESTIONS

- ARE CONSERVATISMS IN FRACTURE MECHANICS ANALYSES APPROPRIATE?
- WHAT IS THE SIGNIFICANCE OF PROBABILISTIC FRACTURE MECHANICS CALCULATIONS?

## CONSERVATISMS IN FRACTURE MECHANICS ANALYSES

### I. BOUNDING VALUES ON INPUT PARAMETERS

- . EXAMPLES ARE FLAW SIZE AND TOUGHNESS
- . CONSERVATISM CAN BE QUANTIFIED
- ADDRESSED BY PROBABILISTIC FRACTURE MECHANICS

### II. ANALYTICAL ASSUMPTIONS

- EXAMPLES ARE FLAW SHAPE, CLAD EFFECTS, WPS
- . CONSERVATISM NOT READILY QUANTIFIED
- Not Addressed by Probabilistic Fracture Mechanics
- Assumptions Selected to Give Net Decrease in Failure Probability

#### - III. SAFETY FACTORS

 Allow for Factors not Even Identified in Analytic Model



## UNQUANTIFIED CONSERVATIVE FACTORS

	AM	ALYTICAL MODEL	
FACTOR	NRC STAFF	ASME CODE	INDUSTRY
SAFETY FACTOR	NONE	1.414	NONE
CLAD THERMAL EXPANSION	Yes (K Increased 17%)	No	YES (CE) No ( <u>W</u> , B&W)
FLAW LENGTH	VERY LONG (K INCREASED 20%)	6 х Дертн	Very Long (CE) 6xDepth ( <u>W</u> , B&W)
FLAW DESCRIPTION	At Vessel ID Normal to Stress Extends Thru Clad	Same	Same
Warm Prestress	No	No	Yes
CRACK ARREST	Yes	LOCA, YES PTS, ?	Yes
SUPPRESSION OF CRACK GROWTH BY CLAD	No	No	No

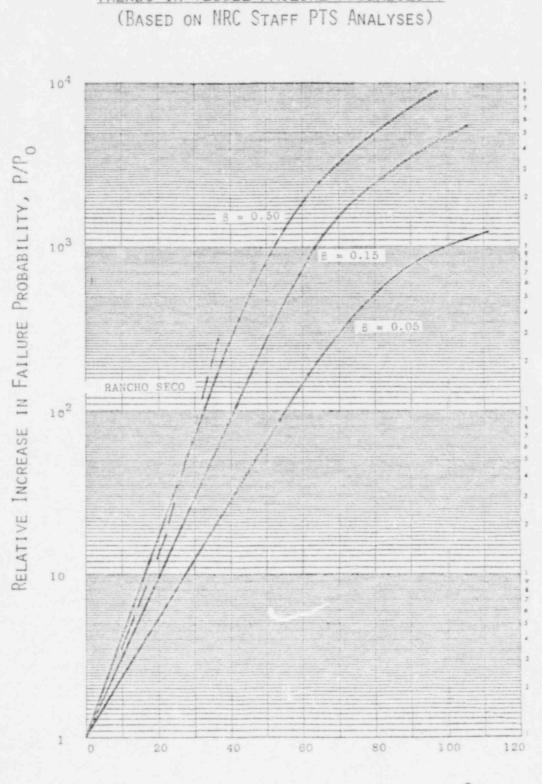
## CONCLUSIONS

- NRC STAFF ANALYSES CONSISTENT WITH ASME CODE (I.E., CODE SAFETY FACTOR OF 1.414 ACCOMMODATED BY CONSERVATISMS NOT REQUIRED BY CODE)
- PROBABILISTIC FRACTURE MECHANICS QUANTIFIES ONLY SOME OF CONSERVATISM IN FRACTURE MECHANICS MODEL
- GREATEST UNCERTAINTY IN ALL FRACTURE MECHANICS MODELS IS SIZE AND NATURE OF FLAW

## BENEFIT OF INSPECTION ON VESSEL RELIABILITY

- OBJECTIVE ESTIMATE INCREASE IN VESSEL RELIABILITY THAT CAN BE ACHIEVED BY USING IMPROVED ISI TECHNIQUES
- METHOD PNL FLAW DETECTION ESTIMATES WERE USED TO MODIFY NRC STAFF ESTIMATES OF VESSEL FAILURE PROBABILITY
- RESULTS DECREASE IN FAILURE PROBABILITY

- ALLOWABLE INCREASE IN RTNDT



TRENDS IN VESSEL FAILURE PROBABILITY

Increase in  ${\rm RT}_{\rm NDT}$  From Baseline Value,  $^{\rm O}{\rm F}$ 

#### EXAMPLE CALCULATION FOR BENEFIT OF INSPECTION

				Failure Probability		
Δ	Р(А)	PND	P(F/A)	P(A) • P(F/A) (without ISI)	P(A)*PND*P(F/A) (with ISI)	
0.125	$8.3 \times 10^{-1}$	0	0	0	0	
	1.6 x 10 <sup>-1</sup>	0.10	$1.5 \times 10^{-4}$	$2.4 \times 10^{-5}$	$2.4 \times 10^{-6}$	
0.50	4.2 x 10 <sup>-3</sup>	0.05	$1.0 \times 10^{-2}$	$4.2 \times 10^{-5}$	$2.1 \times 10^{-6}$	
	$4.1 \times 10^{-4}$	0.05	$5.4 \times 10^{-2}$	$2.2 \times 10^{-5}$	$1.1 \times 10^{-6}$	
	$1.3 \times 10^{-4}$	0.05	$5.6 \times 10^{-2}$	$7.3 \times 10^{-6}$	$3.6 \times 10^{-7}$	
	$4.2 \times 10^{-5}$	0.05	$4.5 \times 10^{-2}$	$1.9 \times 10^{-6}$	$9.5 \times 10^{-8}$	
	1.3 x 10 <sup>-5</sup>	0.05	-	~ 0	~ 0	
3.0	$5.0 \times 10^{-6}$	0.05	-	· 0	$\sim 0$	
3.5	$3.3 \times 10^{-6}$	0.05		$\sim 0$	~0	
					والمحصف مكروباته التهو	
				$P_{0}(F) = 9.7 \times 10^{-5}$	$P(F) = 6.1 \times 10^{-7}$	
	ed on data fr			ler on "Failure Probab 982	ility of a RPV	

(3) Probability of flaw nondetection  $(P_{ND})$  for smooth strip clad

A = Flaw depth

P(A) = Probability of a flaw of depth A in the critical weld

- P(F/A) = Probability of failure for the Rancho Seco transient given the presence of a flaw of depth A
- PND(A) = Probability of not detecting a flaw of depth A based on PNL estimates
- P(A)\*P(F/A) = Probability of failure without ISI given the occurance of the Rancho Seco transient
- $P(A) \cdot P(F/A) \cdot P_{ND}$  = Probability of failure with ISI given the occurance of the Rancho Seco transient

# ESTIMATED INCREASES IN ALLOWABLE PTNDT

CLAD/FINISH/FLAW DIRECTION	PROBABILITY OF DETECTION (A = FLAW DEPTH, INCH)	Factor of Improvement(1) In Reliability	Allowable Increase in RT <sub>NDT</sub> , <sup>o</sup> f
STRIP/SMOOTH/PERPENDICULAR AND PARALLEL }	95%, a > 0.25	16 то 32	24 то 31
THREE WIRE/SMOOTH AND UNGROUND/PERPENDICULAR }	85%, а = 0.25 то 0.5 90‰, а > 0.5	7.5 то 15	17 то 24
SINGLE WIRE/SMOOTH/PARALLEL STRIP/UNGROUND/PARALLEL MANUAL/GROUND/PERPENDICULAR AND PARALLEL	80%, а = 0.25 то 0.5 35%, а > 0.5	5.5 то 11	15 то 21
Single Wire/Unground/Perpendicular and Parallel $\}$	75%, а = 0.25 то 0.5 80%, а > 0.5	4.3 то 8,5	12 то 19
Manual/Unground/Perpendicular and Parallel }	50%, а = 0.5 то 1.0 75%, а > 1.0	2,8 то 5,6	10 то 15

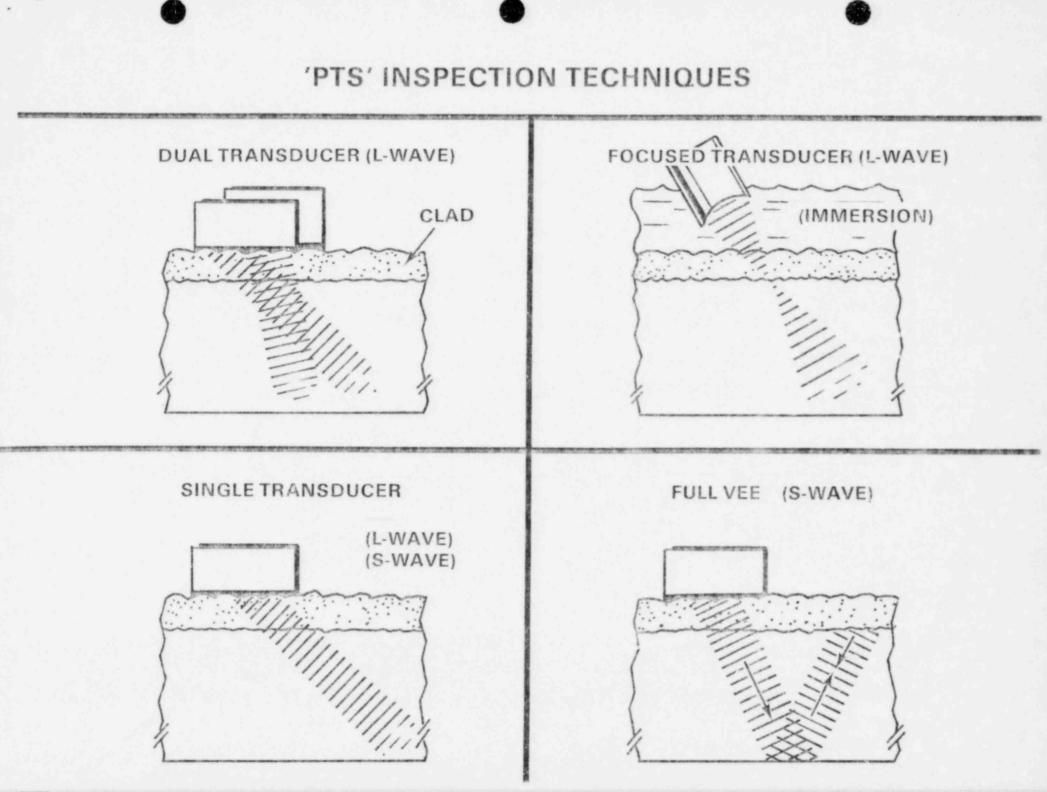
(1) FACTOR OF IMPROVEMENT = PROBABILITY OF FAILURE WITHOUT INSPECTION/PROBABILITY OF FAILURE WITH INSPECTION.

Lower bound assumes flaws are isolated and independent occurrences. Upper bound assumes possible occurrence of multiple flaws in a given weld (i.e., only half of flaws are random occurrences).

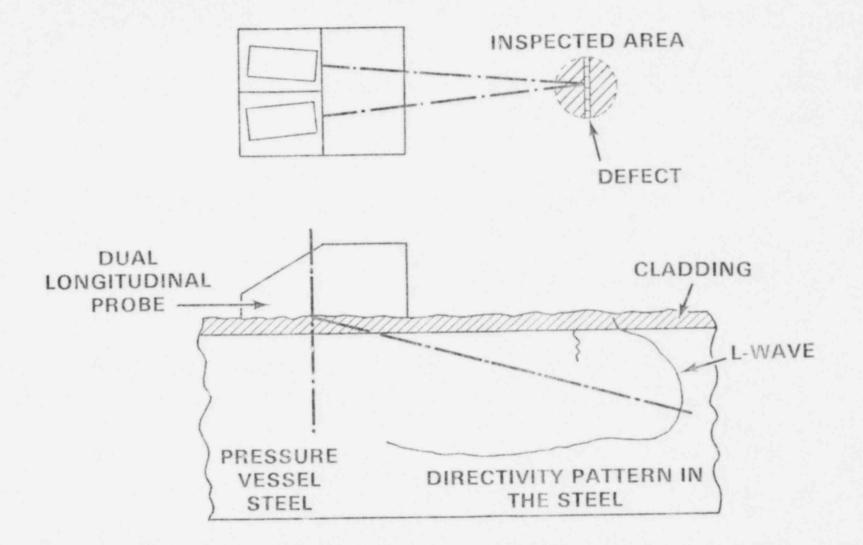
## CONCLUSIONS REGARDING BENEFITS OF IMPROVED ISI TECHNIQUES

- Improved ISI Can Justify an Increase in Allowable RT<sub>NDT</sub>
- Under Ideal Conditions (Smooth Strip Clad) RT<sub>NDT</sub> Limit Can Be Increased Up to 30<sup>o</sup>F
- Even Under Adverse Conditions (Unground -Manual) An Increase of 10 to 15°F Can be Justified



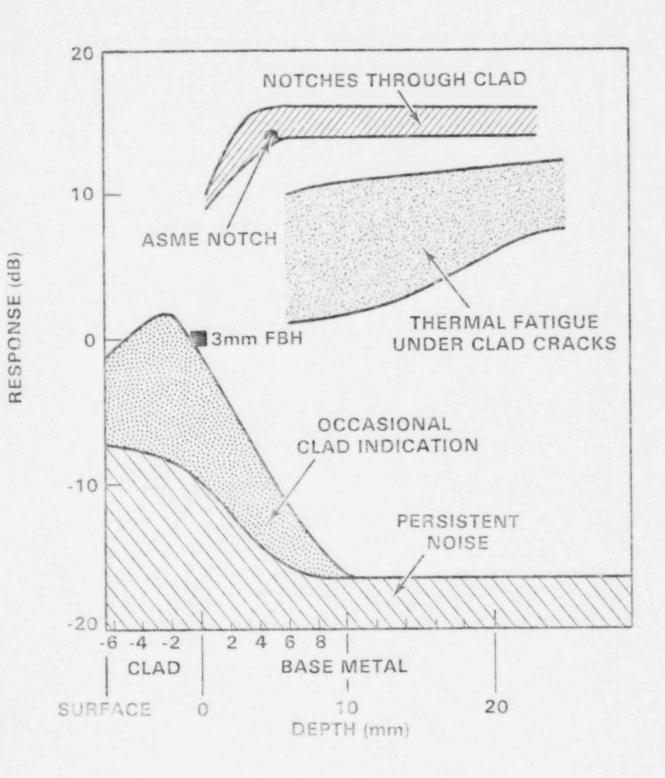


DUAL PROBE FOR UNDERCLAD CRACK DETECTION



UNDERCLAD CRACK DETECTION STUDY

CLAD	FINISH	FLAW DIRECTION WITH RESPECT TO CLAD	SINGLE CRACK PROBABILITY OF DETECTION
STRIP	GROUND	PERPENDICULAR AND	95%
		PARALLEL	0.25" AND GREATER FLAWS
THREE WIRE	GROUND	PERPENDICULAR	85%, 0.25''-0.5'' FLAW
STRIP	UNGROUND	PERPENDICULAR	90%, 0.5" OR GREATER FLAW
SINGLE WIRE	GROUND	PARALLEL	80%, 0.25"-0.5" FLAWS
STRIP	UNGROUND	PARALLEL	85%, 0.5" OR GREATER FLAWS
MANUAL	GROUND	PERPENDICULAR AND	
		PARALLEL	
SINGLE WIRE	UNGROUND	PERPENDICULAR AND	75%, 0.25''-0.5'' FLAW
		PARALLEL	80%, 0.5" OR GREATER FLAW
MANUAL	UNGROUND	PERPENDICULAR AND	50%, 0.5"-1.0" FLAW
		PARALLEL	75%, 1.0" OR GREATER FLAW







# FUTURE WORK

- OPTIMIZE DEFECTION TECH-NIQUES
- DEVELOP STANDARD CRITERIA FOR CALIBRATION REFLECTOR AND FLAW RECORDING LEVELS
- DEVELOP CRITERIA FOR VITRI-FICATION BLOCKS

#### (NRC STAFF EVALUATION OF PTS)

- IN SUBSTANTIAL AGREEMENT WITH OVERALL APPROACH,
   METHODOLOGY, TECHNIQUES, CONCLUSIONS.
  - USE OF RTNDT AS "SCREENING" PARAMETER
  - SELECTION OF SCREENING CRITERIA UTILIZING OPERATING EXPERIENCE.
  - USE OF PROBABILISTIC APPROACH TO SUPPORT OPERATING EXPERIENCE.

DISAGREE ON CERTAIN TECHNICAL BETAILS

- CONSISTENCY OF OPERATING EXPERIENCE WITH PRA.
- FREQUENCIES OF SOME EVENT SEQUENCES.
- CALCULATIONAL TECHNIQUES IN FRACTURE ANALYSES -EFFECT OF CLAD, USE OF FINITE FLAW FOR ARREST.
- BELIEVE THAT HIGHER VALUES FOR "SCREENING" CRITERIA CAN BE JUSTIFIED.
- PROGRAMS FOR PLANT SPECIFIC EVALUATIONS SHOULD

-BE REQUIRED 18 MONTHS PRIOR TO EXCEEDING THE SCREENING CRITERIA -PERMIT EVENT SEQUENCE COMPARISONS



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# PRESSURIZED THERMAL SHOCK ISSUE ELEMENTS OF WOG PROGRAMS

#### • WCAP-10019 (12/81)

- Responds to NUREG-0737, Item 2.K.2.13
- Analyses of design bases transients

Conclusion: No near-term safety concerns

- May 28, 1982 Report
  - Provides assessment of frequency of occurrence of cooldown transients
  - Supports WCAP-10019
  - Establishes temperature limit criteria for potential flaw initiation

Conclusion: No near-term safety concerns for > 5 EFPY

- June 16, 1982 Report
  - Provides an assessment of benefits and penalties of fuel-management techniques to reduce vessel fluence

3920W02398.6

# PRESSURIZED THERMAL SHOCK ISSUE ELEMENTS OF WOG PROGRAMS (Cont)

- June 22, 1982 Report
  - Step-by-step review of WOG Emergency Response Guidelines relative to impact on PTS
- July 15, 1982 Report
  - WOG assessment of relationship between 5/28/82 report Transient Event Sequence Results and NRC Probabilistic Fracture Mechanics Analysis
  - WOG recommendations for future regulatory activities, and Plant-Specific Programs
- September 2, 1982 Report
  - WOG approach to "outliers"
  - WOG interpretation of plant experience

392DW02398.7

#### HOG APPROACH TO PTS

- MOG 5/28 REPORT DEMONSTRATES THAT THE LIKELIHOOD THAT A SEVERE COOLDOWN TRANSIENT MOULD OCCUR WHICH COULD LEAD TO FLAW INITIATION IS OF THE ORDER OF 10<sup>-3</sup> PER REACTOR YEAR FOR VESSELS WITH RT<sub>NDT</sub> IN THE RANGE OF 310°F (LONGITUDINAL) AND 335°F (CIRCUMFERENTIAL).
- MOG 7/15 NEPORT DEPENDENT THAT VESSELS WITH MEAN RT<sub>NDT</sub> OF •300°F EXAMIBIT FLAW EXTENSION PROBABILITIES « 10<sup>-6</sup> PER REACTOR VEAR WHEN SUBJECTED TO TRANSIENTS OF 5/28 REPORT (WITH EXCEPTION OF A CLASS OF SOLOCAS IN THE 2" - 6" RANGE).
- COMBINATION OF PROBABILISTIC APPROACH IN 7/15 REPORT AND DETERMINISTIC ANALYSES FOR SMALL NUMBER OF TRANSIENTS THAT LIE OUTSIDE PRA RESULTS DEMONSTRATES PLANT SAFETY FOR ALL <u>N</u> VESSELS FOR RT<sub>NDT</sub> ~ 270°F (LONGITUDINAL) AND 325°F (CIRCUMFERENTIAL).



- DEVELOPMENT OF ENERGENCY RESPONSE GUIDELINE MODIFICATIONS TO ADDRESS FTS.
- IMPLEMENTATION OF CRITICAL SAFETY FUNCTION FOR R. V. INTEGRITY AND SUBSEMUENT FUNCTION RESTORATION GUIDELINES INTO THE MOG EMERGENCY MESPORSE GUIDELINES.
- DEVELOPMENT OF GENERIC THAINING PACKAGE FOR OPERATOR TRAINING FOR PTS.
- DEVELOPMENT OF GENERIC TRAINING PACKAGE FOR OPERATOR TRAINING FOR STEAM GENERATOR TUBE RUPTURE.
- TESTING AND ANALYTICAL WORK IN THE AREA OF WARM PRE-STRESSING (FLAW SHAPE AND CLAD EFFECTS).
- · REACTOR COOLANT PUMP TRIP CRITERIA DEVELOPMENT.
- SYSTEMATIC EVALUATION OF EFFECTS OF STAGNANT LOOP TRANSIENTS.

#### WOG SUPPORTS/RECOMMENDS

. GO FORWARD WITH NRC PROPOSED SCREENING CRITERIA OF:

270°F RTNDT - LONGITUDINAL 300°F RTNDT - CIRCUMFERENTIAL

ALTHOUGH WE BELIEVE VALUES APPROXIMATELY 30°F GREATER, WOULD BE MORE APPROPRIATE,

- \* PLANT-SPECIFIC PROGRAMS BE DEVELOPED 18 MONTHS IN ADVANCE OF EXCEEDING THE SCREENING CRITERIA
- PLANT-SPECIFIC PROGRAMS UTILITE COMPARATIVE PLANT SEQUENCE ANALYSIS AND DETERMINISTIC FRACTURE MECHANICS EVALUATIONS OF SIGNIFICANT EVENTS.
- \* FUTURE REMOVAL OF CONSERVATISMS SHOULD BE UTILIZED IN INCREASING THE SCREENING CRITERIA.

# PRESSURIZED THERMAL SHOCK ISSUE WOG POSITION

- NRC should use 7/15/82 "screening values" of RT<sub>NDT</sub> to prioritize attentions to operating plants
- Plant-Specific Programs can be prepared ~18 months in advance of exceeding "screening limit"
- Programs could include
  - Comparative plant sequence analysis
  - Plant-specific RT<sub>NDT</sub> calculations
  - Deterministic fracture mechanics evaluation of contributing transients
  - Enhanced training
  - Procedure modifications
  - Evaluation of potential remedial actions

# B&W OWNERS GROUP

- THERMAL SHOCK PROGRAM
- GENERAL COMMENTS ON NRC STAFF'S 9-13-82
   DRAFT REPORT
- WHERE TO NOW?

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#### 9-30-82

# B&W THERMAL SHOCK PROGRAM

- GENERIC REPORTS
  - BAW-1628 (DECEMBER 1980)
  - BAW-1648 (NOVEMBER 1980)
- PLANT SPECIFIC
  - DPCo OCONEE-1 SUBMITTAL (JANUARY 1982)
  - GPUN TMI-1 SUBMITTAL (JULY 1982)
  - OTHERS ON HOLD



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#### COMMENTS ON THE STAFF'S DRAFT REPORT

# APPROACH (PG. 1-4)

- SCREENING CRITERION IS AN ACCEPTABLE WAY OF INDICATING WHEN/IF PLANT SPECIFIC EVALUATIONS ARE REQUIRED
  - A. VALUES ARE CONSERVATIVE, BASED ON TODAY'S KNOWLEDGE
  - B. MUST BE <u>FLEXIBLE</u> TO ACCOUNT FOR TECHNOLOGICAL ADVANCES. (E.G. MIXING, FRACTURE TOUGHNESS, EXPERIENCE)
  - C. SHOULD NOT LIMIT CALCULATION OF RTNDT TO METHODS SHOWN (OTHER METHODS SHOULD BE ALLOWED IF SOUND)
- 2. SUGGEST CLARIFICATION OF SEQUENCE:
  - A. SCREENING CRITERIA
  - B. PLANT SPECIFIC EVALUATIONS (EFPY)
  - C. IF NECESSARY, EVALUATE MODIFICATIONS/IMPROVEMENTS
- 3. NOT NECESSARY TO PROVIDE THE TECHNICAL BASIS FOR THE REMAINDER OF PLANTS DESIGN LIFE. STAYING ADEQUATELY AHEAD (SIMILAR TO 10CRF50, APPENDIX G) IS ALL THAT'S REQUIRED.

### COMMENTS (CONT'D.)

# ACCEPTANCE CRITERIA

- SUGGEST A CLEAR DEFINITION OF "FAILURE" FOR REGULATORY PURPOSES. (CRACK INITIATION, CRACK ARREST, CORE MELT, RADIATION RELEASE)
- 2. PLANT-SPECIFIC CRITERIA SHOULD BE ESTABLISHED BEFORE ANY EFFORT IS "WASTED" ON EVALUATIONS.



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COMMENTS (CONT'D.)

#### APPLICABILITY OF METHODOLOGY AND RESULTS

1. RESULTS BASED ON INPUT FROM WESTINGHOUSE OWNERS GROUP

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- THERE ARE SOME BASIC DIFFERENCES IN THE B&W PLANT (E.G. VENT VALVES, OTSG)
- THE SIGNIFICANCE OF THESE DIFFERENCES SHOULD BE DETERMINED

COMMENTS (CONT'D.)

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**<u>TIMING</u>** - NEEDS SOME CLARIFICATION

- 1. BEGIN PLANT SPECIFIC EVALUATION 3 YEARS PRIOR TO REACHING SCREENING CRITERIA
- 2. MUST BE SUBMITTED TO STAFF \_? YEARS PRIOR TO REACHING CRITERIA
- 3. SUGGEST ADDING A COLUMN TO TABLE P.1: "RT<sub>NDT</sub> AFTER 3 ADDITIONAL <u>CALENDAR</u> YEARS"

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#### WHERE TO NOW?

- REMAINDER OF B&W PLANTS ON "HOLD" UNTIL OCONEE-1 AND TMI-1 EVALUATIONS ARE DETERMINED TO BE ACCEPTABLE OR UNACCEPTABLE
- 2. B&W OWNERS CONTINUING WITH R.V. MATERIALS PROGRAM
- 3. SUGGEST STAFF OBTAIN ALL VALUES IN TABLE P-1 FROM LICENSEES BEFORE FINALIZING REPORT
- 4. SCREENING CRITERIA SHOULD BE PERIODICALLY RE-EVALUATED BASED ON EXPERIENCE AND/OR EMERGING TECHNOLOGIES
- 5. B&W BASIC DIFFERENCES SHOULD BE ACKNOWLEDGED BEFORE FINALIZING THE REPORT
- 6. TIME SHOULD BE ALLOWED FOR DETAILED REVIEW