UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001
SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
PECO ENERGY COMPANY
RELATED TO EQUIVALENT MARGINS ANALYSIS
PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3
DOCKET NOS, 50-277 AND 50-278

### 1.0 INTRODUCTION

In a letter dated May 17, 1994, PECO Energy Company (the licensee) submitted for staff review and approval its assessment of the applicability to the Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3, reactor vessels of General Electric Company (GE) Topical Report, NEDO-32205, Revision 1, " 10 CFR 50, Appendix G, Equivalent Margin Analysis for Low Upper Shelf Energy in BWR/2 Through BWR/6 Vessels." As part of the submittal, the licensee provided plant-specific worksheets to demonstrate that the Peach Bottom reactor vessel materials are bounded by the analysis provided in the GE topical report.

Appendix $G$ of 10 CFR Part 50, requires that reactor vessel beltline material must maintain a Charpy upper-shelf energy (USE) of no less than $50 \mathrm{ft}-1 \mathrm{~b}$, unless it is demonstrated in a manner approved by the Director, Office of Nuclear Reactor Regulation, that lower values of USE will provide margins of safety against fracture equivalent to those required by Appendix $G$ of the American Society of Mechanical Engineers Boiler and Pressure Vessel (ASME) Code. ASME Code Case $\mathrm{N}-512$ contains analytic procedures and acceptance criteria for demonstrating that reactor vessel beltline materials with low Charpy USE will have margins of safety against fracture equivalent to Appendix $G$ of the ASME Code.

In a December 9, 1993 letter to L. A. England, BWR Owners Group, from J. T. Wiggins, U.S. Nuclear Regulatory Commission, the staff reviewed the GE Topical Report NEDO-32205, Revision 1. The staff concluded that the reactor pressure vessels of the participating utilities should have margins of safety against ductile failure in low USE plates and welds until the end of their licenses ( 32 EFPY) for level A, B, C, and D conditions, and meet the criteria of ASME Code Case N-512. Individual licensees that reference the topical report as the basis for addressing the USE requirements of 10 CFR Part 50, Appendix $G$, were requested to confirm the plant-specific applicability of the report by comparing the predicted percentage of decrease in the USE to the allowable decrease in the USE from the topical report.

### 2.0 EVALUATION

Methods acceptable to the staff for determining the percentage decrease in USE are documented in Regulatory Guide (RG) 1.99, Revision 2. Figure 2 in the RG indicates that the percentage of decrease in USE increases with increasing amounts of copper and neutron fluence. However, the percentage of decrease in

USE could be affected by surveillance test results. If surveillance data indicates that the percentage of decrease in USE is greater than the amount predicted by Figure 2 in this RG, the percentage of decrease in USE for the material must be increased. If surveillance data indicates that the percentage of decrease in USE is less than the amount predicted by Figure 2 in the RG, the percentage of decrease in USE for the material may be decreased from the amount predicted by Figure 2.

As a result of the information provided by the licensee in their responses to information requested in Generic Letter (GL) 92-01, Revision 1, "Reactor Vessel Structural Integrity, 10 CFR 50.54(f)," the staff has determined that insufficient information existed for five of the six beltline plates and the circumferential beltline weld in unit 2 to determine that they will have USE greater than $50 \mathrm{ft-1}$ at expiration of the Peach Bottom licenss. All of the beltline welds in unit 3 are projected to have USE greater than $50 \mathrm{ft}-1 \mathrm{~b}$ at expiration of the Peach Bottom license. Eight of the 9 plates in the beltline of unit 3 have insufficient information to determine that they will have USE greater than $50 \mathrm{ft}-1 \mathrm{~b}$ at the expiration of the Peach Bottom license. Hence, only the circumferential beltline weld in unit 2 and 13 of the beltine plates in both units need to satisfy the analysis limits in NEDO-32205, Revision 1.

The percentage of decrease in USE from the Peach Bottom surveillance plates and welds is less than the amount projected by Figure 2 in RG 1.99, Revision 2. Hence, the percentage of decrease in USE for the Peach Bottom beltline plates and welds may be estimated using their copper, projected neutron fluence and Figure 2 in RG 1.99.

The limiting plate and circumferential beltline weld in unit 2 have $0.13 \%$ and $0.06 \%$ copper, respectively. The limiting plate in unit 3 has $0.15 \%$ copper. The percentage of decrease in USE for the beltline plate with the greatest amount of copper and neutron fluence is projected to be $13 \%$ and the percentage of decrease in USE for the beltline circumferential weld is $10 \%$.

The allowable decrease in USE from the topical report is $21 \%$ and $34 \%$ for plate and weld material, respectively. Since the allowable decrease in USE is greater than the values projected for the beltline materials, the conclusions of the topical report are appilicable to the Peach Bottom reactor vessels.

### 3.0 CONCLUSIONS

Since the projected decrease in USE for the beltline plates and weld is equivalent or less than the allowable decrease in USE from the topical report, the conclusions of the topical report are applicable to the Peach Bottom reactor vessels.

The Peach Bottom reactor vessels satisfy the criteria in ASME Code Case N-512, will provide margins of safety against fracture equivalent to those required by Appendix $G$ of the ASME Code at the expiration of its license, and meet the requirements of Appendix G, 10 CFR Part 50 for reactor vessels with USE less than $50 \mathrm{ft}-1 \mathrm{~b}$.

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