

April 14, 1992

1CAN049208

Mr. Robert Martin Regional Administrator U. S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 400 Arlington, TX 76011-8064

Subject: Arkansas Nuclear One - Unit 1
Docket No. 50-313
License No. DPR-51
Special Report - Once Through Steam Generator
Tubing Surveillance - Category C-3 Results

Dear Mr. Martin:

The steam generator tubing inservice inspection was performed on the Arkansas Nuclear One, Unit 1 (ANO-1) Once Through Steam Generators (OTSGs) during March, 1992 (1R10 refueling outage), using the standard bobbin coil technique. During the planning stages for the 1R10 inspection, it was noted by the eddy current vendor that in previous inspections they had established a threshold signal-to-noise (S/N) ratio of 5:1, below which potential indications were not sized. Based upon recent industry experience where it has been shown that small amplitude signals can represent significant through wall degradation. It was concluded that the S/N screening criterion would no longer be used at ANO-1. This position was previously discussed with the NRC. This, in addition to the fact that the ANO-1 OTSGs had not performed a baseline inspection since 1982, lead to the decision to perform a 100% inspection of both OTSGs during 1R10. All non-plugged tubes in both OTSGs were examined full length.

The result: of the inspection revealed that a total of 428 tubes out of the 15296 non-plugged tubes in the "A" OTSG and a total of 316 tubes out of 15423 non-plugged tubes in the "B" OTSG had greater than 40% through wall imperfections or non-quantifiable indications. The distribution of these results place the "A" OTSG in the C-3 category for the A-1 and A-3 groups as defined by ANO-1 Technical Specification 4.18.3.b as well as the remainder of the OTCG. The result of the inspection of the A-2 group of the "A" OTSG was C-2. The results of the inspection of the A-1 and A-3 groups in the "B" OTSG were also C-3. The result of the inspections of the A-2 group of the "B" OTSG and the remainder of the "B" OTSG was C-1 and C-2, respectively.

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Figure 1 provides an upper tube sheet view which identifies the A-1 and A-3 groups. The A-1 group is the three rows on either side of the open inspection lane (row 76) from the periphery to the center of the OTSG. The A-2 group is defined by ANO-1 Technical Specifications as all unplugged tubes with sleeves installed. Group A-3, or the wedge group from the 15th tube support plate and up, is immediately adjacent to the A-1 group.

Note 2 of ANO-1 Technical Specification Table 4.18-2 requires ANO-1 to plug or sleeve all defective tubes and to request NRC approval of remedial action. This note, along with ANO-1 Technical Specifications 4.18.6 and 6.12.5 require a Special Report be submitted prior to resumption of plant operation. This submittal provides the required report.

The defects in both OTSGs were p\*imarily located above the 15th tube support plate with a significant fraction located within the upper tube sheet or at the face. Figure 2 d icts the axial locations of the defects identified during this inspection for the "A" and "B" OTSGs. Figure 3 depicts the axial location of reportable (>20% throughwall) indications identified during the 1R6 through 1R9 inspections for the "A" and "B" OTSGs. The distribution of the defects across the bundle identified during the current outage is shown in Figures 4, 5, 6, and 7 for the "A" and "B" OTSGs. The cumulative results for all previous indications are shown in Figures 8 and 9. Comparing the previous inspection results to those obtained during this outage shows similar distribution of defect locations both axially and across the bundle.

Based upon the similarity between the recently identified defective tubes and past defective tubes from both a radial and axial location standpoint, Entergy Operations concludes that the mechanism causing the observed defacts continues to be sulfur-induced intergranular attack (IGA). The sulfur-induced IGA corrosion was determined through the examination of pulled tube sections from 1982 and 1984. This phenomena occurs at relatively low temperatures, provided oxygen is present to allow the IGA to propagate. This process was discussed at length with the NRC in an August 31, 1983, meeting (Summary of the meeting, dated September 27, 1983, 1CNA098305).

Subsequent to the initial identification of this mechanism, ANO-1 instituted the practice of maintaining a nitrogen blanket on the steam generators while the plant is shutdown to prevent exygen ingress. This action, combined with the tri-bed resin condensate polishing sys m and the continued use of the B&W/EPRI secondary side chemistry guidelines, has significantly reduced this problem.

In comparison to previous inspections, a greater number of tubes was identified as being defective during this surveillance. This can be attributed to several factors including the magnitude of the inspection (100% full length of both OTSGs) and improved inspection techniques and practices. Specifically, ANO-1 has historically used a frequency of 400 kHz for both detection and sizing of indications. Based on the tube wall

thickness (0.035 inches), the "prime" frequency for sizing is calculated to be 600 kHz. In addition, because of interferences to the signal caused by the tube sheet regions, a tube sheet suppression mix is typically used to enhance the signal response and provide better signal analysis. For 1R10, the data was analyzed using multi-frequency analysis, with sizing of indications being performed at 600 kHz in the freespan areas an at a 600/200 kHz mix at the tube sheet and support plate locations. In addition, high frequency magnetically biased probes were used in 1R10 to provide optimum signal strength and characterization.

Prior to 1R10, ANO-1 utilized a threshold of S/N ratio equal to 5:1. All indications exhibiting a S/N ratio of 5 or less were flagged as "S/N". Most of the S/N indications were relatively low amplitude (< 1 volt), and appeared to exhibit little if any growth. Because of industry concerns over the potential severity of small amplitude indications, the use of S/N was not allowed during 1R10 eddy current testing and will not be used in the future. This resulted in many tubes being repaired, even though there was no apparent change in the eddy current signal.

During 1R10, ANO-1 also implemented the use of "I-Codes" to flag distorted or non-quantifiable indications. All "I-Codes" were required to be further evaluated with a rotating pancake coil (RPC) probe. RPC testing was performed on 224 tubes in the "A" generator and 217 in the "B" generator. All tubes not resolved by RPC or not tested by RPC were either plugged or sleeved. Many of these indications were believed to be manufacturing buff marks (MBMs). ANO-1 permits the use of MBM only if the indication is tested with an RPC probe and has previous history for comparison to reflect no growth. Because there was no recent previous history on several MBM candidates, they were repaired.

Based on the above, Entergy Operations believes that a significant number of defective tubes are due to changes in improved inspection sensitivity and signal disposition.

Entergy Operations is unaware of any unusual operational events which might have attributed to an increased number of defective tubes in the ANO-1 OTSGs. During the last cycle, the unit remained in compliance with the stringent B&W/EPRI secondary water chemistry guidelines. A detailed evaluation of last cycle's operating history is currently underway.

During the last refueling outage (1R9), the secondary side of the OTSGs were chemically cleaned up to the ninth tube support plate. This process was conducted under careful administrative controls. Particular attention was paid to the control of oxygen. The copper removal portion of the cleaning process generated oxygen as a by-product of the chemical reactions. The oxygen was purged from the generator via nitrogen gas over pressure. While some oxygen could have come in contact with the tubing above the ninth support plate, it is not believed to have been a major cause of the damage detected this outage. To accomplish the chemical cleaning, all the secondary handholes and four main feedwater nozzles were removed from each OTSG. This extensive maintenance was carefully controlled, but still resulted in several potential locations for oxygen ingress.

With regard to remedial actions to prevent recurrence, ANO-1 has demonstrated the ability to restrict the IGA phenomena in past cycles by limiting oxygen ingress. ANO Operations and Chemistry personnel are continuing to take steps to preclude oxygen ingress to the steam generators during periods of plant shutdown. During 1R10, no secondary side penetrations were opened in the "A" OTSG. In the "B" OTSG, one main feedwater nozzle was removed for repair but the opening was covered and a nitrogen blanket was on the OTSG during the removal. Additionally, ANO-1 will continue to comply with B&W/F I secondary side chemistry guidelines.

Additional details concerning this outage's inser 1 e inspection results from both the "A" and "B" OTSGs will be submitted to the NRC in the 45-day report required by ANO-1 Technical Specification 4.18.6.

This submittal completes the ANO-1 reporting requirements for steam generator tube surveillance with results in the C-3 category. If you have any questions, or require additional information with regards to this submittal, please contact my office.

Very truly yours,

James J. Fisicaro Director, Licensing

JJF/RWC/sjf Attachments

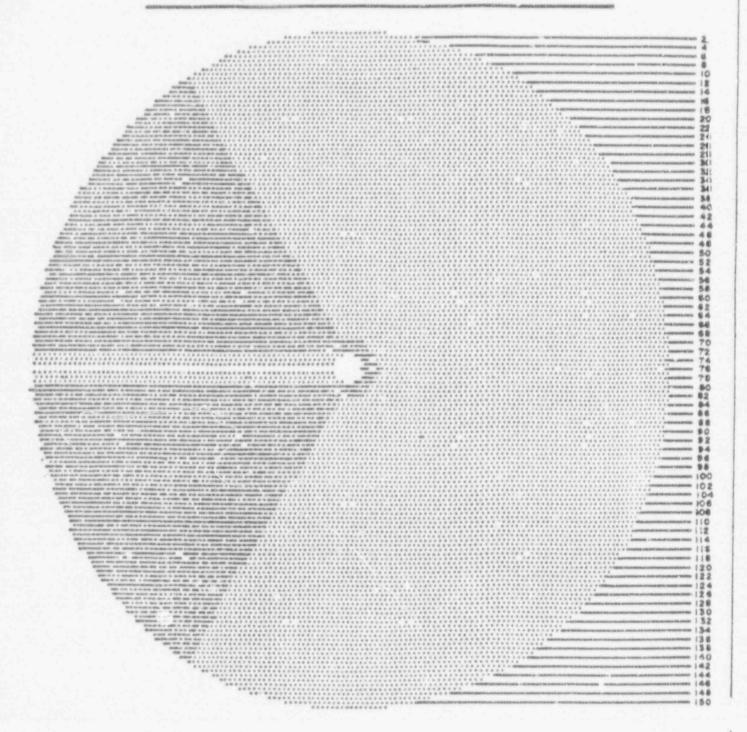
cc: U. S. Nuclear Regulatory Commission Document Control Desk Mail Stop P1-137 Washington, DC 20555

> NRC Senior Resident Inspector Arkansas Nuclear One - ANO-1 & 2 Number 1, Nuclear Plant Road Russellville, AR 72801

Mr. Thomas W. Alexien
NRR Project Manager, Region IV/ANO-1
U. S. Nuclear Regulatory Commission
NPR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

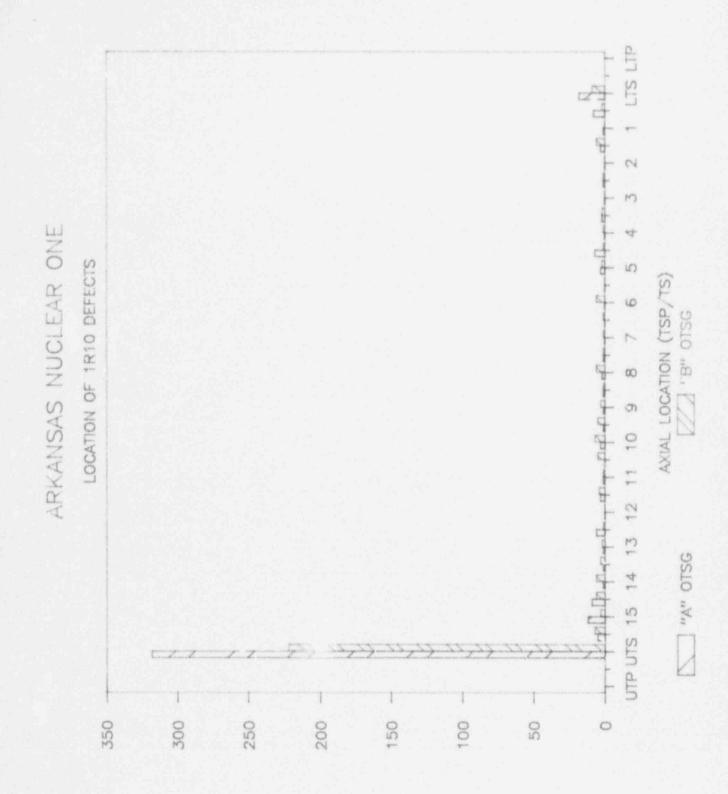
Ms. Sheri Peterson
NRR Project Manager, Region IV/ANO-2
U. S. Nuclear Regulatory Commission
NRR Mail Stop 13-H-3
One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852

# Upper Tube Sheet View of Wedge Shaped Group (Group A-3) per Specification 4.18.3.a.3



#### DESCRIPTION

GROUP A - 1: Lane region tubes as defined in 4.18.3.a.3(1)
GROUP A - 3: Wedge shaped group depicted by darkened region of figure



# DEFECTS

#### ARKANSAS NUCLEAR ONE

LOCATION OF 1R6-1R9 INDICATIONS

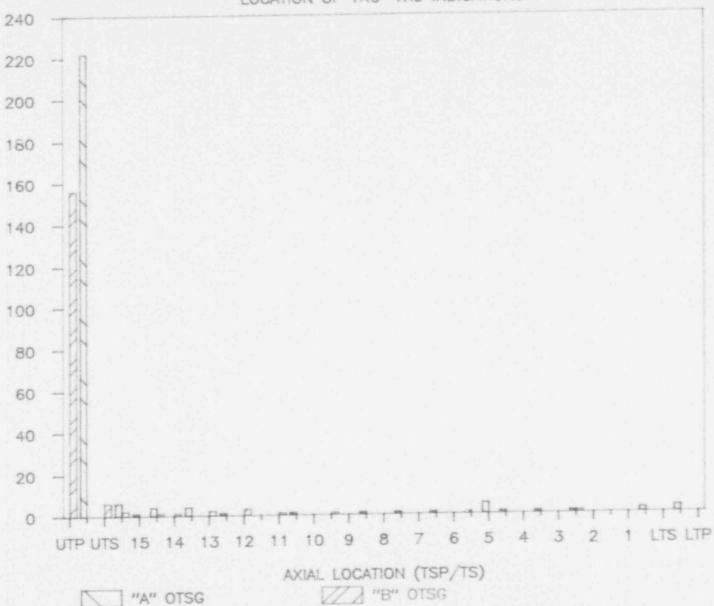


FIGURE 3

#### TUBES TO BE PLUGGED DURING 03/92 RFG

PLANT: ARKANSAS UNIT 1

GENERATOR: A

. TUBES TO BE PLUGGED DURING 1810 (234)

TOTAL TUBES

ex BGB TUGAN (THE MER 3.1 Thursday April 2, 1902 9 15 JA HE

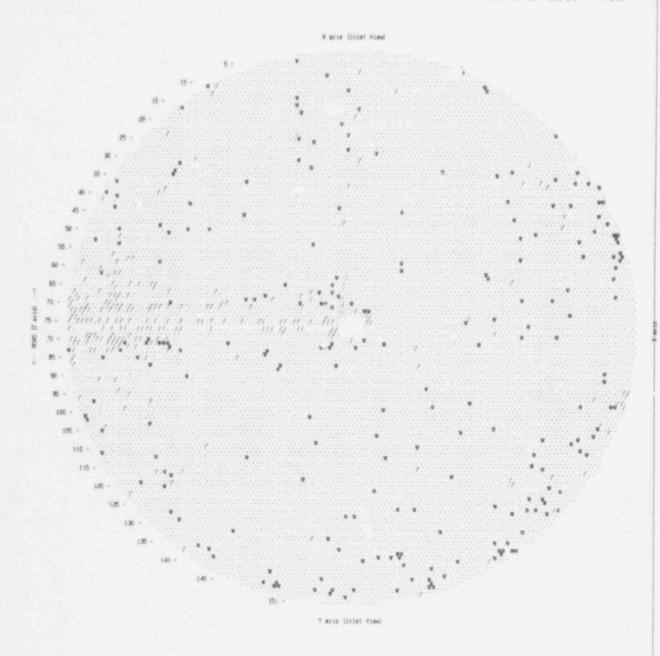
: 15531

SUPPORT ROOS ( )

40

TOTAL TUBES ASSIGNED: 234

OUT OF SERVICE (/) : 235



## TUBES SLEEVED DURING 03/92 RFO - 31" AND 80" SLEEVES

PLANT: AFKANSAS UNIT 1

GENERATOR: A

0 × TLEES KITH 31" SLEEVES 150

O . TUBES WITH 80' SLEEVES (177)

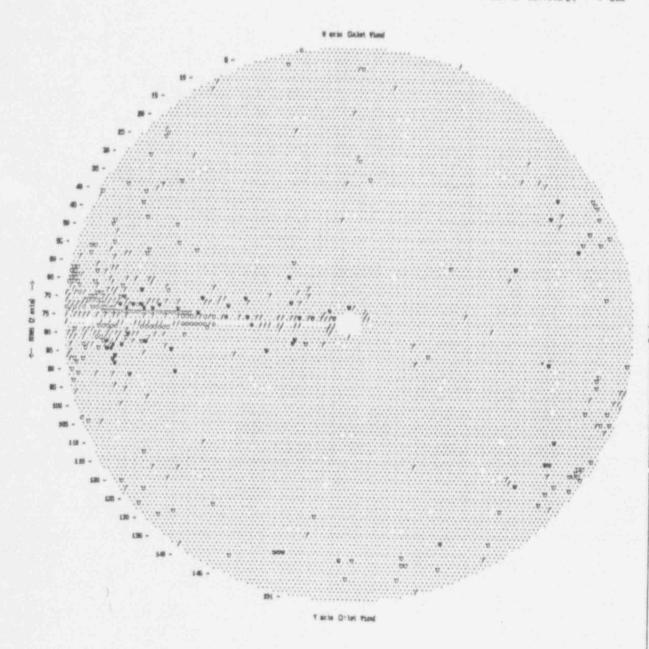
TOTAL TUBES : 15531

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SUPPORT ROOS ( ) : 48

TOTAL TUBES ASSIBNED: 231

DUT OF SERVICE (/) : 235



### TUBES TO BE PLUGGED DURING THE 03/92 RFD

PLANT: ARKANSAS UNIT 1

GENERATOR B

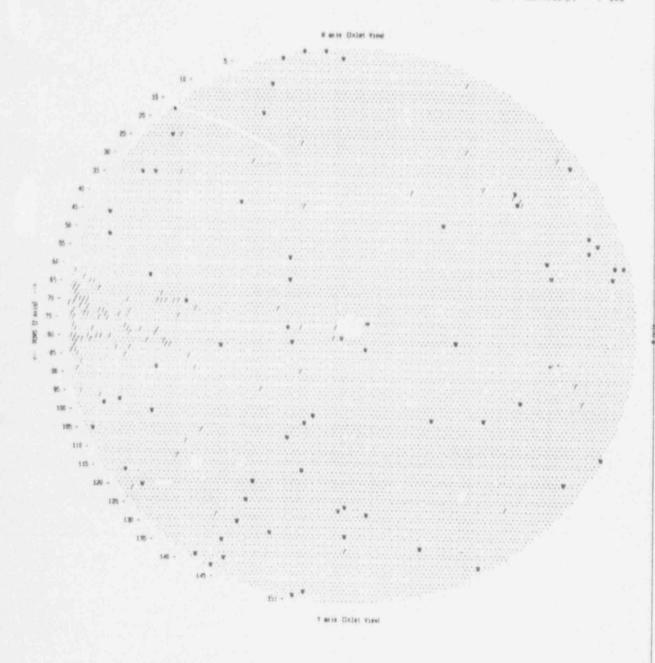
\* \* TUBES TO BE PLUGGED - 03/30 AFO (68)

10TAL 1UBES : 15531

SUPPORT ROOS ( ) : 48

TOTAL TUBES ASSIGNED : 68

OUT OF SERVICE (/) : 108



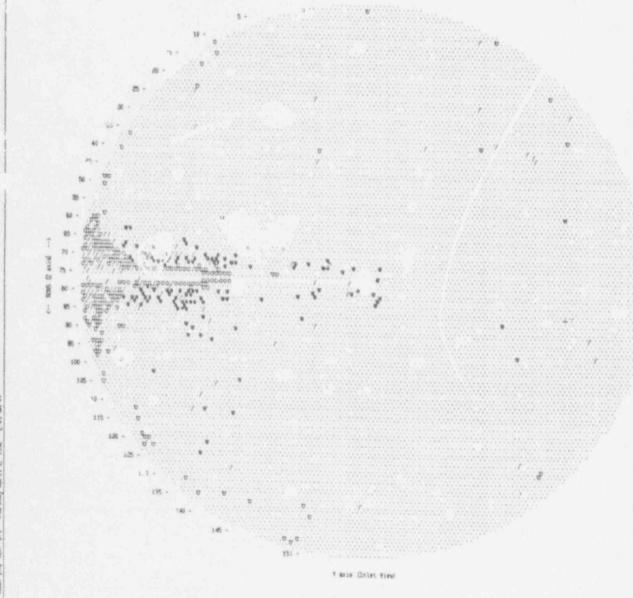
## TUBES SLEEVED DURING 03/92 RFO - 31" AND 80" SLEEVES

ST AL ANSAS UNIT 1

GENERATOR: B

• \* TCE "TITH 31" SLEEVES (124) O = TUBES MITH BO" SLEEVES (220)

TOTAL TUBES A. WED: 344 OUT OF SERVICE (/) 108



## SLEEVES AND PLUGS EXISTING PRIOR TO THE 03/92 RFO

PLANT: ARKANSAS UNIT 1

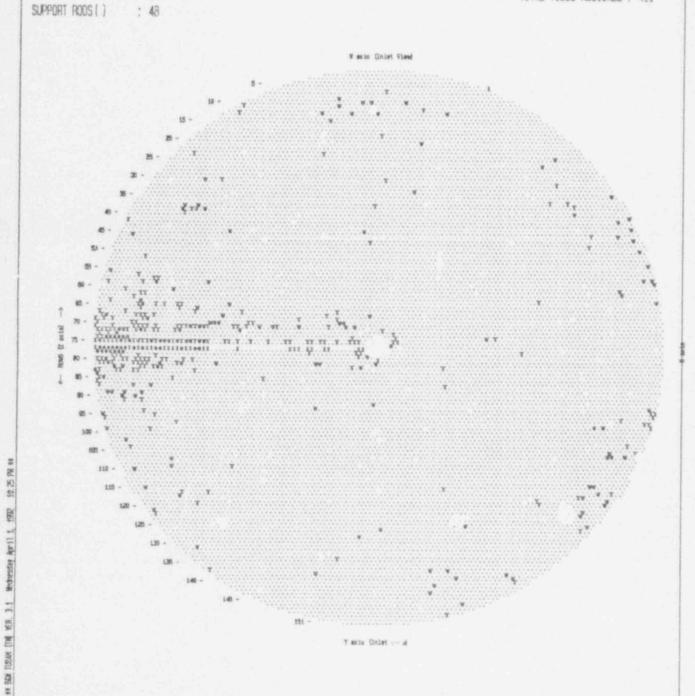
GENERATOR: A

X = TUBES PLUGGED THROUGH 10/90 RFD (235) 6 = TUBES SLEEVED THROUGH 10/90 (50 (176)

TOTAL TUBES

: 15531

TOTAL TUBES ASSIGNED: 411



#### SLEEVES AND PLUGS EXISTING PRIOR TO THE 03/92 RFO

PLANT: APKANSAS UNIT 1

GENERATOR: B

X = TUBES PLUGGED THROUGH 10/90 RFD (108) • TUBES SLEEVED THROUGH 10/90 RFD (147)

TOTAL TUBES : 1550. SUPPORT ROOS ( ) : 48

TOTAL TUBES ASSIGNED: 255

