PHILADELPHIA ELECTRIC COMPANY 2301 MARKET STREET P.O. BOX 8699 PHILADELPHIA. PA. 19101 (215) 841-4000 September 24, 1987 Docket Nos.: 50-277 50-278 50-352 Mr. William T. Russell Administrator, Region I U. S. Nuclear Regulatory Commission ATTENTION: Document Control Desk Washington, DC 20555 Subject: Response to IE Bulletin 87-01 "Thinning of Pipe Walls in Nuclear Power Plants" Dear Mr. Russell: The attached responses for both Peach Bottom and Limerick are being resubmitted with a date of signature. This information was omitted from the original transmittal because of a clerical oversight. Please take appropriate action to correct the files for this Bulletin. We regret any inconveniences this may have caused. Very truly yours, 8709300259 870924 PDR ADDCK 05000277 William M. Alden Engineer-In-Charge Licensing Section Addressee cc: J. W. Gallagher w/attachment T. P. Johnson w/attachment E. M. Kelly w/attachment Attachment

## PHILADELPHIA ELECTRIC COMPANY

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JOSEPH W. GALLAGHER VICE PRESIDENT NUCLEAR OPERATIONS

September 9, 1987

Docket Nos. 50-277 50-278

Mr. W. T. Russell, Administrator U.S. Nuclear Regulatory Commission

Region 1

Attn: Document Control Desk

Washington, DC 20555

Subject:

Peach Bottom Atomic Power Station, Units 2 & 3 Response to I.E. Bulletin 87-01 "Thinning of Pipe

Walls at Nuclear Power Plants"

Mod Request #2259

Reference:

NRC Bulletin No. 87-01 dated 7/9/87

Attachment:

Peach Bottom Atomic Power Station Units 2 & 3 Response to NRC I. E. Bulletin No. 87-01

Thinning of Pipe Walls in Nuclear Power Plants

File:

GOVT 1-1 (Bulletins)

Dear Mr. Russell:

The referenced bulletin requests information regarding utility programs addressing pipe wall thinning due to erosion/corrosion under single and two phase flow conditions. Philadelphia Electric's response to the five requested actions is provided in the following attachment. If further information is required, please do not hesitate to contact us.

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PRB/pd08068706

Attachment

Copy to: Addressee

T. P. Johnson, Resident Inspector
U.S. Nuclear Regulatory Commission
Peach Bottom Atomic Power Station

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## ATTACHMENT

Peach Bottom Atomic Power Station Units 2 & 3
Response to NRC I.E. Bulletin No. 87-01
Thinning of Pipe Walls in Nuclear Power Plants

The subject NRC Bulletin was generated as a result of the 1986 Surry feedwater pipe break accident. Licensees were requested to provide the following information concerning their programs for monitoring the wall thickness of pipes in condensate, feedwater, steam, and connected high energy piping systems, including all safety-related and non-safety-related piping systems fabricated of carbon steel. Information for Peach Bottom Units 2 & 3 in response to 1.E. Bulletin 87-01 is provided below.

 Identify the codes or standards to which the piping was designed and fabricated.

## Response:

The piping systems included in the Peach Bottom Units 2 and 3 inspection programs are listed in Table I. The applicable design code for each system is as shown.

- 2. Describe the scope and extent of your programs for ensuring that pipe wall thicknesses are not reduced below the minimum allowable thickness. Include in the description the criteria that you have established for:
  - a. Selecting points at which to make thickness measurements.
  - Determining how frequently to make thickness measurements.
  - Selecting the methods used to make thickness measurements.
  - d. Making repair/replacement decisions.

## Response:

The inspection programs for Peach Bottom Units 2 & 3 address carbon steel piping systems subject to single phase or two phase flow erosion/corrosion (E/C). Each is addressed separately below:

## Two Phase E/C

Based on our experience dealing with E/C of carbon steel piping in fossil stations, chrome-moly piping was installed in systems such as extraction steam and piping downstream of control valves in feedwater heater drains. This application includes most of the large diameter lines subject to two phase flow. Inspection of particular systems such as the turbine crossaround piping (tiger striping) has been performed for a number of years. A comprehensive review of piping systems to address E/C of carbon steel piping subject to wet steam environments was performed in 1983. This review concentrated on identifying the remaining carbon steel piping subject to two phase flow. The analysis included the review of the system operating parameters and whether there were significant pressure drops (orifices, control valves) which could lead to flashing or cavitation. The operating history of the various systems was also reviewed to identify previous repairs due to leaks or system operational problems. Based on this review, 16 carbon steel piping systems or portions thereof where included in the inspection program as shown in Table I.

- a. The piping inspection points were selected based upon locations in the system where there are abrupt changes in the direction of flow (elbows, tees) immediately downstream of significant pressure drops (orifices, control valves) and at other fittings which cause flow perturbations (reducers, branch connections).
- b. The frequency of the inspections for each of the 16 piping systems is determined by review of the prior inspection data. Those systems which historically have shown significant E/C damage are scheduled for inspection every refueling outage. The remaining lines which have not shown E/C damage based on data review or have low estimated erosion rates are scheduled for inspection every 2 or 3 refueling outages.
- c. All inspections to date have been by manual ultrasonic (UT) thickness measurements supplemented by visual examination where practical. PECo chose UT because it provides accurate verifiable data.
- d. Repair/replacement decisions are based upon review of the inspection data, estimating the erosion rate and comparing it to the design min. wall requirements. All piping below code min. wall or anticipated to encroach on min. wall within the next operating cycle is scheduled for replacement. Replacements are made with chrome-moly materials whenever practical.

- 3 -Single Phase E/C Following the Surry failure PECo developed a program to detect single phase E/C damage. Piping systems were selected for inspection based upon review of parameters known to contribute to single phase E/C. Systems were initially screened using operating temperature. Those systems operating in the temperature range of high E/C susceptibility were further evaluated based upon bulk velocities and configuration including the spacing between fittings in the overall system. A list of the single phase systems included in the Peach Bottom program is contained in Table 1. Inspection point selection was primarily based upon a. temperature, bulk velocity and system geometry. The initial step in inspection point selection was to rank the systems or subsystems for potential E/C damage using operating conditions. These system data points were plotted on a graph which relates velocity and temperature to a predicted E/C rate for a given geometry. This graph is shown in Figure 1. Pipe geometry factors were then applied to the various components in each system to prioritize inspection locations. The final locations selected represent the highest rated components for potential E/C damage. A total of 25 locations were chosen for inspection. Since no baseline thickness data is available for comparison, we intend to perform inspections during the next two refueling outages in order to establish E/C wear rates. The inspection frequency for subsequent outages will be determined based upon evaluation of the inspection data and the estimated wear rates. This section is identical to the description provided for two phase flow. This section is identical to the description provided d. for two phase flow. For liquid-phase systems, state specifically whether the following factors have been considered in establishing your criteria for selecting points at which to monitor piping thickness (Item 2a.) Piping material (e.g. chromium content). Piping configuration (e.g. fittings less than 10 pipe b. diameters apart).

- 4 pH of water in the system (e.g. pH less than 10). System temperature (e.g. between 190 and 500F). d. Fluid bulk velocity (e.g. greater than 10ft/sec.). e. Oxygen content in the system (e.g. oxygen content less f. than 50 ppb). Response: The evaluation of each parameter listed above in the selection of inspection locations is discussed below: Piping material composition can have a significant affect on the E/C rate of a component. Most severe E/C damage has occurred in plain carbon steel piping systems. Small additions of Cr, Cu and Mo can significantly reduce E/C damage of carbon steels. However, specific chemical analysis information for the systems included in the program for Peach Bottom was not available. Therefore, the carbon steel pipe material was considered identical for all system components and was not used for selecting inspection points within a system. Piping configuration is a important factor contributing b. to the E/C rate. The relationship of piping geometries that produce the greatest turbulence also produce the highest E/C rates. Pipe component geometry and the spacing between components was considered within each system to identify and prioritize inspection locations. Peach Bottom is a BWR with neutral pH. As pH levels increase above 9.2, E/C is reduced. Since pH was constant throughout the systems evaluated it was not considered for inspection point selection. Fluid temperature was considered for rating the pipe d. systems or subsystems in terms of the predicted E/C rate. Temperature versus E/C rate has a peak between 240 to 300F. The number of inspection locations is greater for systems operating in this temperature range. Fluid bulk velocity coupled with pipe configuration produce turbulent flow. Flow in conjunction with temperature determine the E/C rate. Velocity and temperature were used for ranking the pipe systems. Velocity and pipe geometry were used for selecting the inspection locations within a system.

- 5 -The oxygen content of the water strongly affects the E/C rate of carbon steel. The data curves for oxygen content versus E/C rate vary considerably; however, the Peach Bottom feedwater oxygen levels have been historically between 20-30ppb which are significantly higher than those reported for Surry (4ppb). Since the oxygen levels are relatively constant for the piping systems evaluated, oxygen was not specifically considered for selecting inspection locations. Chronologically list and summarize the results of all inspections that have been performed, which were specifically conducted for the purpose of identifying pipe wall thinning, whether or not pipe wall thinning was discovered, and any other inspections where pipe wall thinning was discovered even though that was not the purpose of that inspection. Briefly describe the inspection program and indicate whether it was specifically intended to measure wall thickness or whether wall thickness measurements were an incidental determination. Describe what piping was examined and how (e.g. describe the inspection instruments, test method, reference thickness, locations examined, means for locating measurement points in subsequent inspections. Report thickness measurement results and note those C. that were identified as unacceptable and why. Describe actions already taken or planned for piping d. that has been found to have a nonconforming wall thickness. If you have performed a failure analysis, include the results of that analysis. Indicate whether the actions involve repair or replacement, including any change of materials. Response: A chronological listing of inspections performed at Peach Bottom is provided in Table II. The inspections listed in Table II were specifically 2. intended to measure wall thickness in response to E/C concerns. A description of the piping inspected is provided in Table II. All of the inspections were performed utilizing manual UT techniques. The inspectors were qualified in accordance with SNT-TC-1A and the procedures prepared by a qualified Level III.

## 1) Two Phase

In order to maintain repeatability of thickness measurement data, the inspection approach has remained unchanged since 1983. Most of the two phase inspections are performed on small diameter piping. Each location is given a unique identification. Typically there are 4 measurements per location 90 degrees apart. Prior to recording the measurements, the entire area is scanned in order to insure that local areas of wall thinning are being detected. If an area is found to be below the specified thicknesses shown in Table II, the affected area is mapped and the minimum value located and recorded. For the 42 in. dia. turbine crossaround piping, internal visual examinations are performed in addition to UT thickness measurements.

## 2) Single Phase

Single phase inspections also use manual UT. A specific procedure for scanning and data recording was generated based upon experience gained from the Surry failure. Since these inspections are generally performed on large diameter lines, the scans are concentrated on inspection bands in regions where E/C damage would most likely occur. The minimum value detected and the thickness range are recorded. If an area is found to be below the specified value, the area is mapped, a grid established and the min. value located and recorded.

Thickness measurement results are recorded in Table II. The minimum wall values are calculated from ANSI B31.1 Par. 104.1.2 plus a corrosion allowance ranging from 0.030" to 0.080" depending on the pipe diameter.

Measurements thicker than these specified values are considered acceptable unless reviews of prior data indicate an extremely high E/C rate. Those measurements thinner than the specified value require engineering evaluation.

d. If the engineering evaluation determines that a code min.-wall violation is likely during the next operating cycle, replacement of the piping is scheduled. Removed pipe sections are visually examined to determine if cavitation damage is present; no formal failure analysis is performed. Wherever practical, replacements are made using 1 1/4 Cr-1/2 Mo material.

 Describe any plans either for revising the present program or for developing new or additional programs for monitoring pipe wall thickness.

## Response:

The Peach Bottom E/C program provides for the addition or deletion of inspection areas based upon new information. We intend to perform the EPRI Chexal-Horowitz-Erosion-Corrosion (CHEC) analysis for single phase E/C and will amend our program upon evaluation of the results. In addition, we intend to evaluate findings from other utility inspections for their applicability to Peach Bottom.

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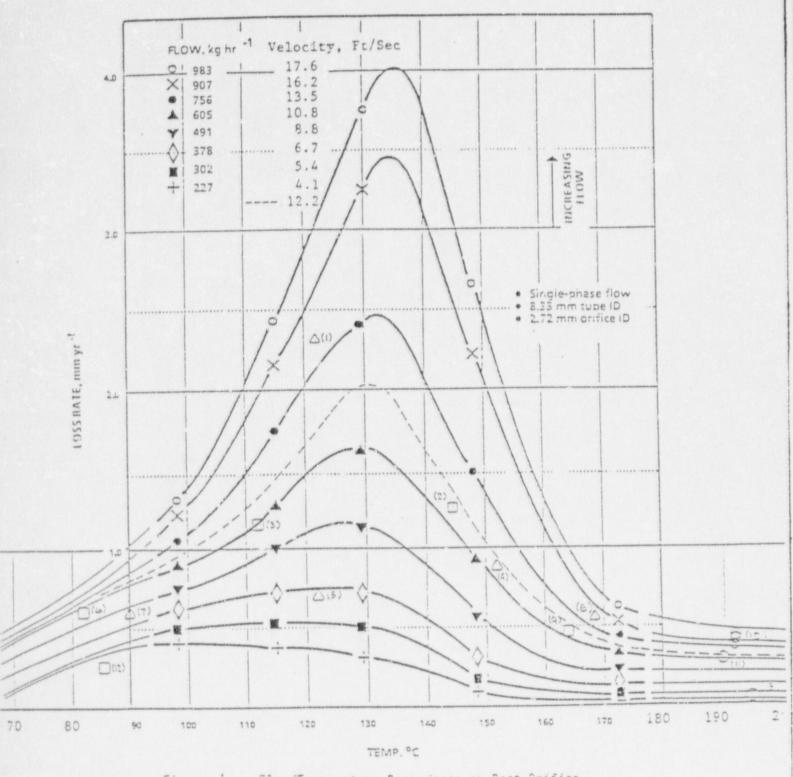


Figure 1 Flow/Temperature Dependence of Post-Orifice Erosion/Corrosion Rates

- A HEATER DRAIN PIPING
- O CONDENSATE PIPING
- O FEEDLATER PIPING
- O MOISTURE SERANTOR DEAIN PIPINS

FOR A DESCRIPTION OF EACH LINE SEE THE CORESPONDING NO. .. ON THE NEXT PLOSE

Ref. EPRI Report NP-3944 duted 4/85.

## System Selection Priority Based on Temperature and Velocity (See Figure 1)

- Drain line from 3rd heater to 2nd heater at control valve inlet reducer.
- 2. Condensate piping from 3rd heater to 4th heater.
- 3. Condensate piping from 2nd heater to 3rd heater.
- 4. Drain line from 4th heater to 3rd heater at control valve inlet reducer.
- 5. Drain line from 3rd heater to 2nd heater.
- 6. Condensate piping from 1st heater to 2nd heater.
- 7. Drain line from 2nd to 1st heater at control valve inlet reducer.
- 8. Drain line from 5th to 4th heater at control valve inlet reducer.
- 9. Condensate piping from 4th to 5th heater.
- 10. Feedwater piping from reactor feed pumps to reactor.
- 11. Condensate piping from 5th heater to reactor feed pump suction.
- 12. Condensate piping from drain cooler to 1st heater.
- 13. Moisture separator drain lines to control valve.

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## Table 1 Pipe Systems Inspected for Erosion/Corrosion Damage

All piping for two phase and single phase flow systems was designed in accordance with ANSI B31.1 1967 except where noted.

Pipe materials are A106 Grade B or A53 Grade B except where noted.

Fitting materials are A234 WPB or A105 Grade II except where noted.

## A. Two Phase Flow

- Main steam crossaround piping between the high pressure turbine exhaust and the moisture separator inlet. (see note 1).
- 2. Reactor feed pump recirculation (min.-flow) piping from valves A0-2139/3139A, R and C to the condenser inlet.
- Feedwater long path recirculation piping between orifice RO-2663/3663 and the condenser inlet.
- 4. Reactor water clean-up piping between R0-106 and the condenser inlet.
- Main steam drains main steam lead drains, main stop valve above seat drains, high pressure turbine inlet lead drains. (see note 1)
- 6. HPCI steam drains- HPCI turbine steam supply line drain from steam trap (ST-3) to condenser, HPCI turbine stop valve above seat drain from orifice R0-70A to the drain pot.
- 7. RCIC steam drains RCIC turbine steam supply line drain from steam trap (ST-122) to condenser, RCIC turbine stop valve above seat drain from orifice R0-76 to the barometric condenser.
- 8. Reactor feed pump turbine steam supply piping drains steam lead, high pressure main stop valve above seat and below seat, low pressure main stop valve above seat and below seat drains. (see note 1)
- 9. Reactor feed pump turbine first stage and shell drains downstream of valves A0-2557/3557 and A0-2685/3685.
- 10. Reactor feed pump leakoff loop seal.

- 11. Offgas recombiner preheater steam supply drain.
- 12. Extraction steam lines to condenser.
- 13. Feedwater heater vent lines to condenser downstream of orifices R0-2059/3059, 2062/3062, 2068/3068 and 2071/3071.
- 14. Main turbine 13th stage shell drain. (see note 1)
- 15. Any carbon steel relief valve discharge piping where leakage through the valve is suspected.
- Reactor feed pump suction side relief valve discharge piping downstream of valves RV-2141/3141A, B, C.

## B. Single Phase Flow (Bulk velocities indicated)

- 1. Feedwater piping (14-17 feet/sec.).
- 2. Condensate piping (10-12 feet/sec.).
- 3. Feedwater heater drain piping (4-7 feet/sec.).
- 4. Moisture separator drain piping (4-7 feet/sec.).
- Note 1 These piping systems or portions thereof are design in accordance with the turbine manufacturer's proprietary requirements.

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2/2	: APER 1 : A.B.C.D.E.F TURBINE : CROSSNRUMNI	α	. 42,70.625	0.332	.700800 (ELEGIL) .600620 (REDUCER) .470670 (OTHERS)*	
77.84	HOTEN 2 H, B, C RFP RECIRCULATION	~	6/0.562	0.414	.309900 (ELEGIA) .400670 (OTHERS)	SEE NOTE
10784	HIVER 2 H, B, C PFP DECIRCULATION HIN FLON LINE	Ν	10.0.509	0.282	. 450-2.100 (FLRMSE) .340400 (OTHERS)	
11/84	FIL LONG PAIN PECIRCULATION		12/0.375	0.143	.370450 (ELEON) .580660 (TEE) .360500 (OTHERS)	
11784	: REER 3 : FIL LONG PRIH RECIRCULATION		10/0.365	0.134	.300380 (ELEON) .320420 (GTHEPS)	
11/64	: REER 3 : FIL LONG PATH RECIPCULATION	~	8/0.322	0.123	.320410 (ELEGI))	
11/84	: RIPER 4 : RUCU-8LONDONN TO CONDENSER	Ν	4/0,438	0.262	.380480	
11/84	RPER 4 : PHCU BLOHOOMH TO CONDENSER		4/0.237	0.102	. 200-, 340 (ELEOUS) . 410-, 460 (FLRISE) . 200-, 360 (OTHERS)	
11/84	HOTER 5 HIP TURBINE INLET	Ν	1.0.250	0.192	. 150 380 (ELEGNS) . 490 640 (TEES) . 150 360 (OTHEPS)	SEE 1101
11/84	HOTH STEAM DRAINS HOTH STEAM LEND ORATH		2.0.343	0.231	.310410 (0THEPS)	

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11784	HATH STEAM LEND DRAINS	2	1/0.250	0.192	.230260	
11/84	RREM S HATH STEAM DRAINS HSV ABOVE SEAT DRAIN	2	2.0.343	0.231	.320640 (ELBOUS)	
11/84	RREA 5 HATH STEAM DRAINS HSV ABOVE SEAT DRAIN	~	1,70,250	0.192	.220280	
17.00	INTER 5 INTER STERI DRAINS INSU RBOVE SERT DRAIN	N	1718 GE SUPPLIED	0.038	.180260 (ELBONS)	
1,00	RPCI STEAM DRAIM TO DRAIM POT	Ν	0.75/0.154	0.100	360450 (ELBOHS) 140250 (ELBOHS) 240250 (TEE) .420450 (TEE) .390450 (JOINTS) .140240 (OTHERS)	
11/84	RIPCI STEALL DRAINS	~	1/0.250	0.192	.200490 (ELBOUS) .440480 (JOINTS) .200330 (OTHERS)	
11784	RCIC STEAM DRAIN TO DRAIN POT	N	1.0.179	0.102	.170290 (ELBONS) .450560 (ORIFICE) .160280 (OTHERS) .550590 (OTHERS)	
11/84	RCIC STEMH DRAIN TO CONDENSER	~	1/0.250	0.192	.140300 (ELB0HS) .440480 (J0THTS) .200340 (J0THTS) .120280 (OTHERS)	SEE NOTE
11.84	RREH 8 SEPT URATHS R, B, C HP/LP HSV RBOVE AND BELCH SENT DRAINS		0.75.0.154	0.154	. 230 720 (ELBOUS)	SEE HOTE

PERCH BOTTON ATOMIC POMER STATION EROSION/CORROSION INSPECTIONS

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11,784	REER 9 REPT URAINS REPT STERN SUPPLY URAIN		0.7	0.75/0.154	0.154	.045335 (ELBOHS) .160240 (TEE) .080200 (0THERS)	SEE NOTE 1
48/11	HIPER 8 H, B, C REPT DRAINS			2/0.343	0.231	.300~.710 (ELBONS) .180~.640 (OTHERS)	SEE MOTE 1
11/84	REPT FIRST STAGE AND SHELL URATHE			2/0.218	0.165	.210220	
11784	RPER 9 PEPT FIRST STRGE RID SPIELL DRATES			6.70, 280	151	002,-002.	
27.65	REP SENL LEAK-OFF LOOP SEAL			4/0.237	0.088	.235335 (ELBOWS)	
2/82	REER TO SEAL LEAK-OFF LOOP SEAL			6.0,280	160.0	.300325 (ELBONS) .280400 (OTHERS)	
5/82	: REER 11 : OFFGRS RECONBINER PREHERIER : STERN SUPPLY DRAIN			621.071	0.160	.100200	SEE HOTES 1,
\$3/5	REEN 11 OFFENS RECOVERNER PREMERTER STEWN SUPPLY ORALIN			2/0.218	0.156	. 250250 (ELBONS) .170230 (OTHERS)	-
5/82	HAREA 12 SIID HERIER EXTRACTION STERN DRAINS TO A,B,C CONDENSER			3/0.216	0.151	. 220260 (ELBONS) .190220 (OTHERS)	
5/85	: NREG 12 : 2ND HEATER EXTRACTION STEAM : DRAINS TO A, B, C CONDENSER		ν	4/0.237	0.127	.220270 (ELBONS) .200320 (OTHERS)	
28/82	: RREN 12 : 3PO NERIER EXTRACTION STERN : DRAINS TO R, B, C CONDENSER		Ν	621.071	0.148	090150 (ELEGIS)	SEE NOTE 2

PEACH BOTTON ATOMIC PONER STATION EROSTON/CORROSTON INSPECTIONS

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DATE	SYSTEM LOCATION	THIN	HONE DIRECTOR THICK	HIN INCLASE:	THTCKNESS RANGE	COMMENTS
5/82	ATH NEMTER EXTRACTION STEAM ODAINS TO M, B,C CONDENSER	2	1/0.179	0.151	.090110 (ELEONS)	SEE NOTE 2
5/82	STILL HEATER EXTRACTION STEAM DRAINS TO HOLST. SEP. THINK	N	2/0.218	0.165	.270480 (ELEONS)	
5/82	STILL HEBTER EXTRACTION STEPH OBJUINS TO HOTST. SEP. THINK	Ν	170.179	0.156	.190260 (ELEON) .300 (TEE) .150255 '0THERS)	
2/85	HPER 13 FEEDINTER HEATER VEHT LINES	2	3/0.216	0.160	.220	
2/85	REEDINIER HENTER VENT LINES	N	2.0.218	0.155	.180190	
27.85	RPEH 16 R,B,C RFP (SUCTION) RELIEF URLUE DISCHARGE PIPE	Ν	2.0.218	0.099	.070410 (ELEGUS) .300460 (COUPL'6) .430 (REDUCER) .120430 (OTHERS)	SEE HOTE 1
11,784	RIVER 16 R REP SUCTION SIDE RELIEF VALUE PIPING		1.0.179	0.037	.140330	
EHD	OF FUEL CYCLE SIX INSPECTIONS (UNI	IIT 3)				
11785	: RRER 2 : R,B,C RFP RECIRCULATION	m 	: 6/0.562	0.414	. 380-, 700 (ELEGNS) . 400-, 700 (OTHERS)	: SEE HOTE 2
3/82	RREA 6 HPCI STEAM DRAINS	no	1.0.250	0.192	.060710 (ELEQUS) .095290 (OTHERS)	SEE NOTES
8/82	: MPER 6 : HPCI TURBINE STOP URLUE DERIIN :	<i>m</i>	. 0.75.0.154	0.100	230410 (ELEONS) 210600 (TEES) 150470 (OTHERS)	

PERCH COTTON ATOMIC PONER STATION EROSION/CORROSION INSPECTIONS

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8782	RELIC STEMI DRAINS	(7)	1/0.250	0.192	.140690 (ELBONS) .500560 (TEE) .115300 (OTHERS)	SEE MOTES 1,3
58/8	RCIC STERM DRAIMS	(1)	621.071	0.102	.190620 (ELBONS)	
11/85	REEM 8 R, B, C REP NP/LP MSU DPAINS	(17)	2/0.343	0.231	.290660 (ELBONS)	
11/85	HAPER 8 H,B,C RFP HP/LP HSY DRAINS	m	270.343	0.231	470850 (ELBOUS)	SEE NOTE 4
11/85	REPT STEAM SUPPLY CONTINUOUS OBATHS TO CONCENSER	m 	0.75/0.154	0.154	.210399 (ELBOUS)	SEE NOTE 4
11/85	REPT STEAM SUPPLY CONTINUOUS DRAIMS TO CONDENSER	m	1.0.179	0.156	. 180310 (ELBOUS) . 200220 (TEES) . 030200 (OTHERS)	SEE NOTE 2
11/85	REFORM 12 2/10 HEATER EXTRACTION STEPH DRAINS TO A, B, C CUNDENSER	(n)	3.0.216	0.151	.200300	
11/85	REFORM 12 STAND HERTER EXTRACTION STEAM OPAINS TO A,B,C CONDENSER	m 	4/0.237	0.127	150285 (ELBONS) 180340 (OTHERS)	- 
11,85	6. 50 12 3RN HERTER EXTRACTION STERM UPAINS TO A, B, C CONDENSER	m 	1.0.179	0.14	. 125320 (ELBOILS) . 090230 (OTHEPS)	SEE NOTE 2
11/85	HREH 12 1 4TH HERTEP EXTRACTION STERM 1 ORNINS TO A, B, C CONDENSER	m 	6/1/0/1	0.151	. 140305 (ELB0!S) . 120275 (OTHERS)	SEE NOTE 2
11/85	: NPEH 12 : STH HENTER EXTRACTION STEAM : OPATHS TO NOIST, SEP. TAIR	m	2.0.218	0.165	. 240310 (ELBONS) . 200260 (TEE) . 200310 (OTHEPS)	

PERCH BUTTON REGULE PONER STRITTON EROSTON/CORROSTON INSPECTIONS

PHRI II	**IIIO PUNSE HISPECTION POINTS**					
DHIE	: MREBI TO : SYSTEM LUCATION	TIIII	HOLE DIRAMON THICK		THICKNESS RANGE	: CONTINENTS .
11/85	: AFER 12 : STH NEATER EXTRACTION STEAM : URRINS TO NOIST, SEP. TANK	(9)	1/0.179	0.156	.160220	
11/85	REEM 16 R.B.C RFP (SUCTION) PELIEF ONLVE DISCHARGE PIPE	m	2/0.218	0.165	.220470 (ELEGUS) .160480 (OTHERS)	SEE NOTES 2,4
EHD	OF FUEL CYCLE SEVEN THSPECTIONS CONTI	UHIT 25				
3/67	: C, U, F CROSSAROUND PIPING	~	. 42,0.625	0.332	.470680	
3/67	: R.B.C RFP RECIRC LINES		SYSTEM REDESIGNED-SUSPECT	SUSPECT PIPING	IG REPLACED HITH 31655	
4/87	HPCT STEMU DRATH	~	1/0.250	0.192	.240610 (ELEDIAS) .260480 (JOINTS) .240310 (OTHERS)	
7/87	RCIC STERM DRAINS	~	170.250	0.192	.160580 (ELEON) .140380 (OTHERS)	SEE NOTES 1,3
2/8/2	REER S REPT DRAIN	~	2,0.343	0.231	.320-,720 (ELEGUS) .280-,410 (OTHERS)	
28/8/	FIREFA S C REPT HP/LP HSV ABOVE AHD BELON SEAT OPATH	Ν	2/0.343	0.231	.340700 (ELEGUS) .120380 (OTHERS)	SEE MOTES 1,3
28/5	FAPER 9 C REPT HP/LP HSV REOVE GND BELON SERT OPATM	~	0.75/0.154	0.154	.200240 (ELEGIA) .330340 (TEE) .200230 (0THEPS)	
28/8	REPT STERM SUPPLY DRAIN	~	0.75/0.154	0.154	. 280350 (ELEGIS) . 145180 (OTHERS)	SEE NOTE 4
5,8,7	PEPT STERM SUPPLY DRAIM	~	621.071	0.156	.195290	SEE MOTES 1,3

PEACH EOTTON ATOMIC PONER STATION EROSTOL/CORROSION INSPECTIONS

PHRT II XXIIIU PHRSE TESPECTION POBITS\*\*

DIFFE	: MOEGO TO : SYSTEM LUCATION	TIIIN :	: NON DIRABON THICK : CIN/THO	HIR HALL**:	THICKNESS PANGE	. CONNENTS
2/8/5	OFFICERS RECUIBINER STEDIN SUPPLY	Ν	0.75.0.154	201.0	.210370 (ELBONS) .100310 (TEE) .450 (ORIFICE) .090380 (OTHERS)	SEE NOTE 2
5/87	: MRETI 11 : OFFISIS RECOTBINER STEMI SUPPLY : URHIN	~	1.5/0.200	0.167	.160370 (ELBOIS) .150260 (TEE) .110400 (OTHERS)	SEE NOTE 4 SEE NOTE 4 SEE NOTES 1,3
5//87	OPFISHS RECORBINER STEAM SUPPLY	~	0.5/0.147	0.100	.260370 (ELBOIS) .150250 (OTHERS)	
28/82	OPER 11 OPER RECORDINER STEAM SUPPLY OPER IN	Ν	1.0.179	0.160	.110210	SEE NOTES 1,3
5,/87	: RRETH 12 : 380 HENTER EXTRACTION STERM : DRATHS TO A, B, C CONDENSER	~	1.0.179	0.148	.100340 (ELBOHS) .330360 (JOINTS) .090220 (OTHERS)	SEE HOTES 1,3
2,787	HREP 12 4TH HERTER EXTRACTION STEMI DORING TO A, B, C CONDENSER	N	1.0.179	0.151	.240320 (ELBOUS) .220240 (JOINT) .120240 (OTHERS)	SEE NOTES 1,3
28/8	STR HEATER EXTRACTION STEAM DRAINS TO HOIST, SEP, ORATH	~	2/0.218	0.165	.300460 (ELBONS) .180230 (OTHERS)	
4787	REED 14 REED TOPRINE 13TH STAGE SHELL URAIN		12/119 GE SUPPLIED	0,063	.359-,400	
(T)	: APEN 16 : A,B,C RFP (SUCTION) RELIEF : VALVE DISCHARGE PIPE		1,0.179	260'0	. 460-, 470 (REDUCER)	
26.00	RIPER 16 R.B.C REP (SUCTION) RELIEF TONLYE DISCHARGE PIPE		2/0.218	660.0	. 100-, 450 (ELBONS) .220-,230 (REDUCER) .130-,220 (OTHERS)	

# PEDCH BOTTON ATOMIC PONER STATION EROSION/CORROSION INSPECTIONS

# THEY A \*\* THE PHYSE HISPECTION POINTS\*\*

: UNITE: NON DIRENGN THICK: HIN UNCLOSE: THICKNESS RANGE: : CIND: : CIND: : CIND : FREE TO SYSTEM LUCHTON

: CONNENTS

HITEC

PEPLACEMENT PECONIENDED FOR LOCATIONS BELON SPECIFIED HIN WALL VALUE.

EPACUATION BASED UPON ESTIMATED NEAP RATE INDICATED THE PIPING NAS ACCEPTABLE FOR AN ADDITIONAL FUEL CYCLE. REPLACEMENT PENDING NEXT OUTNGE HISPECTION RESULTS.

3. REPLACEMENTS HERE HADE WITH CHRONE HOLY HATERIALS (PIL).

. INSPECT NEXT DUTMGE.

## DEFINITIONS

- OTHERS THOUGH THEET AND OUTLET PIPTING FROM ELBONS AND TEES PLUS PIPTING DOMINSTREAM OF CONTROL UNLIVES MID DRIFICES.
- 104.1.2. FOR PIPE GREATER THAIL OR EQUAL TO 1" DIMIETER, THE HILL HALL VALUE INCLUDES A CORROSTON ALLOHANCE OF 0.030". FOR PIPE LESS THAN THAT I" DIMETER, THE CORPOSION ALLONANCE IS 0.030". \*\* HITL HALL BRSED UPON MIST B31.1. PRR.

PEACH BOTTON ATOMIC POMER STATION EROSION/CORROSION INSPECTIONS

PART 8 \*\*STHIGLE PHASE INSPECTION POINTS\*\*

COMMENTS	SEE NOTE 4 FOR ALL											
THICKNESS RANGE	.580-,720 (1 ELBOH)	.530-,660 (1 ELEON)	.540-,760 (3 ELBONS	.540-,780 (3 ELBONS)	.540830 (3 ELEONS)	.560760 (3 ELBONS)	1.120-1.680 (1 TEE, 1 ELBOW)	1.400-2.300 (1 TEE, 1 ELBOW)	.840-1.200 (1 REDUCER)	.300500 (1 REDUCER)	.320440 (1 REDUCER)	.340960 (1 REDUCER, 1 ELBOW)
HIN URLES	0.516	0.516	0.516	0.516	0.516	0.516	0.387	1.289	0.722	0.151	0.133	0.112
HOM DIR/NOM THICK	20/0.593	20/0.593	20/0.593	20.0.593	20/0.593	20/0.593	18/1.156	24/1.531	12/0.843	8/0.322	12/0.375	12/0.375
: UNIT	CUNIT 2)	Ν	~	~			Ν	Ν	Ν	Ν	Ν	2
: AREA 10 : SYSTEM LOCATION	OF FUEL CYCLE SEVEN INSPECTIONS CONDENSATE PIPING FROM ORBIN COOLER TO 1ST HEATER	CONDENSATE PIPING FROM 1ST TO ZMO HEATER	CONDENSATE PIPING FROM 2410 TO 3RD HEATER	CONDENSATE PIPING FROM 3RD TO 4TH HEHTER	CONDENSATE PIPINS FROM 4TH TO STH HEATER	CONDENSATE PIPING FROM STH HEATER TO RFP SUCTION	: FEEDUATER PIPTING FROM : RFP TO REACTOR	: FEEDUATER PIPING FROM : RFP TO REACTOR	FEEDURTER PIPING FROM SPP TO REACTOR	DRAIN LINE FROM STH TO	SRD HEATER	DRAIN LINE FROM 3RD TO SAID HEATER
DHITE	EHD 3/87	4/87	3,187	3,/87	3/87	4/87	4/87	4787	3/87	3/87	(3) (7)	3/8/2

PERCH BOTTON RIGHTE POWER STATION EROSION/CORROSION INSPECTIONS

PHRT B \*\*STHGLE PHRSE INSPECTION POINTS\*\*

COMMENTS	
5	
SS RANGE	2 ELB
ICKNE N.	.340420 (1 REDUCER)
HU	1 C
×	
UNIT : NON DIAZNON THICK : NIN WALL**: THICKNESS RANGE : CINZIN	0.250
THICK	
MON DIAZMON CINZIND	14/0.375
	17 9
	1
IIII	0 0
	1
	ORSHIII ORSHIII
AREA ID SYSTEM LOCATION	ORAIN LINE FRON 240 TO 1ST HEATER HOISTURE SEPARATOR DRAIN LINE
ARE STS	PRI ISI
DATE	4/87

## HOTES

2. EVALUATION BASED UPON ESTIMATED MEAR RATE INDICATED THE PIPING WAS ACCEPTABLE FOR AN ADDITIONAL FUEL CYCLE. REPLACEMENT PENDING NEXT DUTAGE INSPECTION RESULTS. REPLACEMENT RECOMMENDED FOR LOCATIONS BELOW SPECIFIED MIN WALL VALUE.

REPLACEMENTS WERE MADE WITH CHRONE NOLY MATERIALS (P11).

INSPECT NEXT OUTRGE.

# DEFINITIONS

\*\* MIN. URLL BRSED UPON RUSI B31.1. PRR. 104.1.2. FOR PIPE GREATER THAN OR EQUAL TO 1" DIRNETER, THE MIN. URLL VALUE INCLUDES A CORROSION RILDMANCE OF 0.080". FOR PIPE LESS THAN THERE I" DIRIETER, THE CORROSION ALLOWANCE IS 0.030".

COPY

## PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

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PHILADELPHIA, PA. 19101

(215) 841-5001

JOSEPH W. GALLAGHER VICE PRESIDENT

September 9, 1987

Docket No. 50-352

Mr. W. T. Russell, Administrator U.S. Nuclear Regulatory Commission Region I Attn: Document Control Desk Washington, DC 20555

> Limerick Generating Station, Unit 1 Subject:

Response to I.E. Bulletin 87-01 "Thinning of Pipe

Walls at Nuclear Power Plants"

Mod Request #5613

NRC Bulletin No. 87-01 dated 7/9/87 Reference:

Limerick Generating Station, Unit 1 Attachment:

Response to NRC I. E. Bulletin No. 87-01

Thinning of Pipe Walls in Nuclear Power Plants

GOVT 1-1 (Bulletins) File:

Dear Mr. Russell:

The referenced bulletin requests information regarding utility programs addressing pipe wall thinning due to erosion/corrosion under single and two phase flow conditions. Philadelphia Electric's response to the five requested actions is provided in the following attachment. If further information is required, please do not hesitate to contact US.

Sincerely,

Jan Isullaghan

PRB/pd08218706

Attachment

Copy to: Addressee

E. M. Kelly, Senior Resident Inspector 9624915 \$ Noo. U.S. Nuclear Regulatory Commission

P. O. Box 47

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ATTACHMENT Limerick Generating Station Unit 1 Response to NRC I.E. Bulletin No. 87-01 Thinning of Pipe Walls in Nuclear Power Plants The subject NRC Bulletin was generated as a result of the 1986 Surry feedwater pipe break accident. Licensees were requested to provide the following information concerning their programs for monitoring the wall thickness of pipes in condensate, feedwater, steam, and connected high energy piping systems, including all safety-related and non-safety-related piping systems fabricated of carbon steel. Information for Limerick Unit 1 in response to 1. E. Bulletin 87-01 is provide below Identify the codes or standards to which the piping was 1. designed and fabricated. Response: The Limerick, Unit 1 program is under development. The piping systems presently included in the program scope are listed in Table 1. The applicable design code for each system is as shown. Describe the scope and extent of your programs for ensuring that pipe wall thicknesses are not reduced below the minimum allowable thickness. Include in the description the criteria that you have established for: Selecting points at which to make thickness measurements. a. Determining how frequently to make thickness measurements. c. Selecting the methods used to make thickness measurements. d. Making repair/replacement decisions. Response: The inspection program for Limerick, Unit 1 will address carbon steel piping systems subject to single phase or two phase flow erosion/corrosion (E/C). Each is addressed separately below:

## Two Phase E/C

Development of a program to address E/C of carbon steel piping subject to wet steam environments is in progress. Since Limerick, Unit 1 has completed only one fuel cycle of operation significant E/C damage is not expected. In addition most of the large diameter piping systems subject to two phase flow such as extraction steam are fabricated from chrome-moly materials. We plan to review piping systems utilizing experience gained form inspections performed at Peach Bottom and fossil stations in order to identify remaining carbon steel piping potentially affected by E/C damage. The analysis will include review of the system operating parameters and whether there are significant pressure drops which could lead to flashing or cavitation. Based on this review a program will be developed to monitor pipe wall thickness for the identified suspect systems.

- a. The piping inspection points will include locations in the system where there are abrupt changes in the direction of flow (elbows, tees) immediately downstream of significant pressure drops (orifices, control valves) and at other fittings which cause flow perturbations (reducers, branch connections).
- b. The inspection frequency for each of the piping systems will be determined by review of the prior inspection data. Those systems exhibiting high E/C wear rates will be scheduled for more frequent inspection.
- c. Inspections will utilize ultrasonic (UT) thickness measurements supplemented by visual examination where practical. PECo chose UT because it provides accurate verifiable data.
- d. Repair/replacement decisions will be based upon review of the inspection data, estimating the erosion rate and comparing it to the design min. wall requirements. All piping below code min. wall or anticipated to encroach on min. wall within the next operating cycle will be scheduled for replacement. Replacements will be made with chrome-moly materials whenever practical.

- 3 -Single Phase E/C Following the Surry failure PECo developed a program to detect single phase E/C damage. Piping systems were selected for inspection based upon review of parameters known to contribute to single phase E/C. Systems were initially screened using operating temperature. Those systems operating in the temperature range of high E/C susceptibility were further evaluated based upon bulk velocities and configuration including the spacing between fittings in the overall system. A list of the single phase systems included in the Limerick, Unit 1 program is contained in Table 1. Inspection point selection was primarily based upon temperature, bulk velocity and system geometry. The initial step in inspection point selection was to rank the systems or subsystems for potential E/C damage using operating conditions. These system data points were plotted on a graph which relates velocity and temperature to a predicted E/C rate for a given geometry. This graph is shown in Figure 1. Pipe geometry factors were then applied to the various components in each system to prioritize inspection locations. The final locations selected represent the highest rated components for potential E/C damage. A total of 26 locations were chosen. Since no baseline thickness data is available for comparison, we intend to perform inspections during the next two refueling outages in order to establish E/C wear rates. The inspection frequency for subsequent outages will be determined based upon evaluation of the inspection data and the estimated wear rates. This section is identical to the description provided for two phase flow. This section is identical to the description provided for two phase flow. For liquid-phase systems, state specifically whether the following factors have been considered in establishing your criteria for selecting points at which to monitor piping thickness (Item 2a.) Piping material (e.g. chromium content). Piping configuration (e.g. fittings less than 10 pipe b. diameters apart). pH of water in the system (e.g. pH less than 10). C. System temperature (e.g. between 190 and 500F).

- 4 -Fluid bulk velocity (e.g. greater than 10ft/sec.). e. Oxygen content in the system (e.g. oxygen content less than 50 ppb). Response: The evaluation of each parameter listed above in the selection of inspection locations is discussed below: Piping material composition can have a significant affect on the E/C rate of a component. Most severe E/C damage has occurred in plain carbon steel piping systems. Small additions of Cr, Cu and Mo can significantly reduce E/C damage of carbon steels. However, specific chemical analysis information for the systems included in the program for Limerick, Unit 1 was not available. Therefore, the carbon steel pipe material was considered identical for all system components and was not used for selecting inspection points within a system. Piping configuration is an important factor contributing b. to the E/C rate. The relationship of piping geometries that produce the greatest turbulence also produce the highest E/C rates. Pipe component geometry and the spacing between components was considered within each system to identify and prioritize inspection locations. Limerick, Unit 1 is a BWR with neutral pH. As pH levels C. increase above 9.2, E/C is reduced. Since pH was constant throughout the systems evaluated it was not considered for inspection point selection. Fluid temperature was considered for rating the pipe d. systems or subsystems in terms of the predicted E/C rate. Temperature versus E/C rate has a peak between 240 to 300F. The number of inspection locations is greater for systems operating in this temperature range. Fluid bulk velocity coupled with pipe configuration produce turbulent flow. Flow in conjunction with temperature determine the E/C rate. Velocity and temperature were used for ranking the pipe systems. Velocity and pipe geometry were used for selecting the inspection locations within a system. The oxygen content of the water strongly affects the E/C rate of carbon steel. The data curves for oxygen content versus E/C rate vary considerably; however, the oxygen levels are relatively constant for the piping systems evaluated; therefore, oxygen was not specifically considered for selecting inspection locations.

- 5 -Chronologically list and summarize the results of all inspections that have been performed, which were specifically conducted for the purpose of identifying pipe wall thinning, whether or not pipe wall thinning was discovered, and any other inspections where pipe wall thinning was discovered even though that was not the purpose of that inspection. Briefly describe the inspection program and indicate whether it was specifically intended to measure wall thickness or whether wall thickness measurements were an incidental determination. Describe what piping was examined and how (e.g. describe the inspection instruments, test method, reference thickness, locations examined, means for locating measurement points in subsequent inspections. Report thickness measurement results and note those that were identified as unacceptable and why. Describe actions already taken or planned for piping that has been found to have a nonconforming wall thickness. If you have performed a failure analysis, include the results of that analysis. Indicate whether the actions involve repair or replacement, including any change of materials. Response: A chronological listing of inspections performed at Limerick, Unit 1 during the first refueling outage is provided in Table II. The inspections listed in Table II were specifically intended to measure wall thickness in response to E/C concerns. A description of the piping inspected is provided in Table II. All of the inspections were performed utilizing manual UT techniques. The inspectors were qualified in accordance with SNT-TC-1A and the procedures prepared by a qualified Level III. The inspection results listed in Table II are from single phase flow piping systems. As mentioned previously, the two phase flow inspection program is under development. Since Limerick, Unit 1 had only been operating for one fuel cycle, the primary purpose for performing the inspections was to gather baseline thickness data. The single phase examinations are generally performed on large diameter lines. Scans are concentrated on inspection bands in regions where E/C damage would most likely occur. The minimum value detected and the thickness range are recorded. If an area is found to be below the specified value, the area is mapped, a grid established and the min. value located and recorded.

c. Thickness measurement results are recorded in Table II. The specified minimum wall values are also listed.

Measurements thicker than these specified values are considered acceptable. Those measurements thinner than the specified value will require engineering evaluation.

- d. If the engineering evaluation determines that a code min.-wall violation is likely during the next operating cycle, replacement of the piping will be scheduled. Wherever practical, replacements will be made using 1 1/4 Cr-1/2 Mo material.
- Describe any plans either for revising the present program or for developing new or additional programs for monitoring pipe wall thickness.

## Response:

The Limerick, Unit 1 E/C program is still under development. We intend to perform the EPRI Chexal-Horowitz-Erosion-Corrosion (CHEC) analysis for single phase E/C and will amend our program upon evaluation of the results. In addition, we intend to evaluate findings from other utility inspections for their applicability to Limerick.

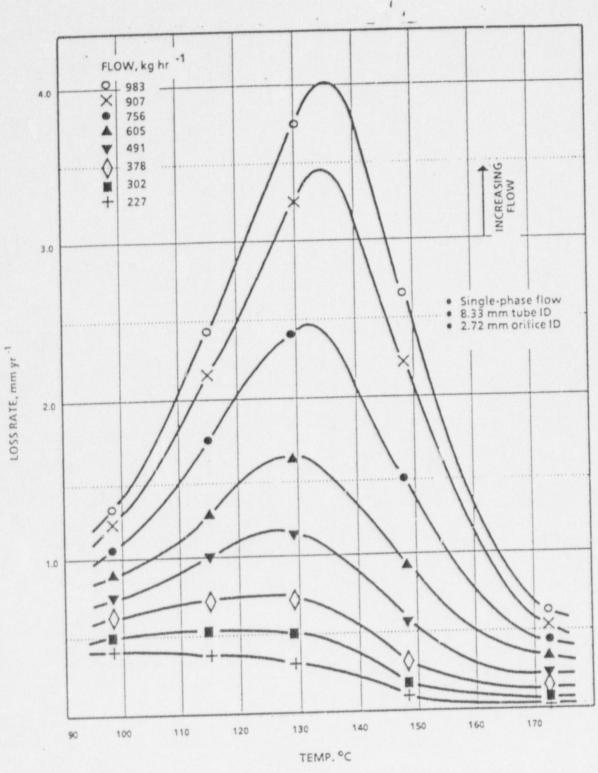


Figure / Flow/Temperature Dependence of Post-Orifice Erosion/Corrosion Rates

### Table I

## Pipe Systems Inspected for Erosion/Corrosion Damage

- A. Two Phase Flow Systems to be defined
- B. Single Phase Flow (Bulk velocity)
  - 1. Feedwater piping" (11-19 feet/sec.)
  - Condensate plping (11-15 feet/sec.)
  - 3. Feedwater heater drain piping (3-10 feet/sec.)
  - 4. Moisture separator drain piping (2-7 feet/sec.)

Piping designed in accordance with ANSI B31.1 1971 Pipe materials are A106 Grade B Fitting materials are A234 Grade WPB

Portions of system are designed in accordance with ASME Section III Class 1 and 2 1971 Edition with Addenda through Winter 1971.

Class 1 Pipe materials are SA333 Grade 6 Class 1 fitting materials are SA420 Grade WPL

Class 2 Pipe materials are A106 Grade B Class 2 fitting materials are A234 Grade WPB

LIMERICK GENERATING STATION UNIT

SINGLE PHASE INSPECTION POINTS\*\*

ш	DATE : AREA DESIGNATION : SYSTEM LOCATION	NOM DIR/NON THICK; HINNBLL*; THICKNESS RANGE	HIMISEL*	THICKNESS RANGE (IN)	COMMENTS
1	END OF FUEL CYCLE DINE		and the time and the spin and the time and the time and the time and time a		
6/87	: FU PIPING 2ND TO 3RD FW HEATER :	: 20/0.594	0.464	. 580710	ELBON
	FW PIPING 3RD TO 4TH HERTER	20/0.594	0.464	.570946	ELBOH
78/9	FU PIPING 4TH TO STH FU HERTER	20/0.594	0.464	.580-1.020	ELBON
5.87	FW PIPING FW PUMP TO 6TH	20/1.5	1.350	1.560-2.200	REDUCER : ELEGIA
	HEHTER	16/1.21	0.980	2.500-3.400	YOUR BODY
28/9	FU PIPING ETH HERTER TO CONTRINNENT URL	20/1.5	1.211	1.750-2.000	ELBOH
6/87	NOIST SEP OR MOIST SEP TO U/S OF 4TH FU HEATER	8/0.332 6/0.280	0.187	.290450 .260350	REDUCER
28/3	HEATER DRAIN 4TH HEATER TO U/S OF 3RD HEATER	14/0.375	0.134	1.000-1.200	UALUE BODY
6/87	HEATER DRAIN 6TH HEATER TO U/S OF 5TH HEATER	6.0.280	0.162	.300580	ELBON

MIN. WALL BASED UPON ANSI 831.1 PAR. 104.1.2. FOR PIPE GREATER THAN OR EQUAL TO 1" DIAMETER, THE MIN. WALL VALUE INCLUDES A CORROSION ALLOWANCE OF 0.080". FOR PIPE LESS THAN 1" DIAMETER, THE CORROSION ALLOWANCE IS 0.080".

THESE MEASUREMENTS WERE MADE AFTER THE FIRST FUEL CYCLE WAS COMPLETED. THEY THEREFORE REPRESENT BASELINE DATA.