



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 22, 2022

Greg T. Glenn
Licensing Engineering
Westinghouse Electric Company
Global Operations Services
1000 Westinghouse Drive
Cranberry Township, PA 16066

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF
WESTINGHOUSE ELECTRIC COMPANY, NO. 99900404/2022-201

Dear Mr. Glenn:

On June 6 - 10, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the Westinghouse Electric Company (WEC) facility in Cranberry Township, PA. This limited-scope routine inspection assessed WEC's compliance with provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," and selected portions of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."

This technically-focused inspection specifically evaluated WEC's implementation of the quality activities associated with the design, testing and analysis of safety-related fuel assemblies being supplied to U.S. nuclear power plants. The enclosed report presents the results of the inspection. This NRC inspection report does not constitute NRC endorsement of WEC's overall quality assurance (QA) or 10 CFR Part 21 programs.


Based on the results of this inspection, the NRC inspection team found the implementation of your QA program met the applicable technical and regulatory requirements imposed on you by your customers or NRC licensees. No findings of significance were identified.

In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," of the NRC's "Rules of Practice," a copy of this letter, and its enclosure(s), will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's

Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning this matter, please contact Ms. Andrea Keim of my staff at (301) 415-1671.

Sincerely,



Signed by Kavanagh, Kerri
on 07/22/22

Kerri A. Kavanagh, Chief
Quality Assurance and Vendor Inspection Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

Docket No.: 99900404

EPID: I-2022-201-0027

Enclosure:
Inspection Report No. 99900404/2022-201
and Attachment

SUBJECT: NUCLEAR REGULATORY COMMISSION VENDOR INSPECTION REPORT OF WESTINGHOUSE ELECTRIC COMPANY, REPORT NO. 99900404/2022-201 DATED: JULY 22, 2022

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ADAMS Accession No.: ML22199A043

NRR-106

OFFICE	NRR/DRO/IQVB	NRR/DRO/IQVB	NRR/DSS/SFNB	NRR/DRO/IQVB
NAME	AKeim	PPrescott	JKaizer	Kkavanagh
DATE	07/19/2022	07/20/2022	07/21/2022	07/22/2022

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**U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NEW REACTORS
DIVISION OF CONSTRUCTION INSPECTION
AND OPERATIONAL PROGRAMS
VENDOR INSPECTION REPORT**

Docket No.: 99900404

Report No.: 99900404/2022-201

Vendor: Westinghouse Electric Company
1000 Westinghouse Drive
Cranberry Township, PA 16066

Vendor Contact: Mr. Greg T. Glenn
Email: glenngt@westinghouse.com
Phone: (412) 374-6974

Nuclear Industry Activity: Westinghouse Electric Company (WEC) provides nuclear fuel and fuel analyses as well as other engineering and design services for new and operating nuclear reactors.

Inspection Dates: June 6 – 9, 2022

Inspectors: Andrea Keim NRR/DRO/IQVB, Team Leader
Paul Prescott NRR/DRO/IQVB*
Joshua Kaizer NRR/DSS/SFNB
Reed Anzalone NRR/DANU/UTB2*

*Performed inspection remotely

Approved by: Kerri A. Kavanagh, Chief
Quality Assurance and Vendor Inspection Branch
Division of Reactor Oversight
Office of Nuclear Reactor Regulation

Enclosure

EXECUTIVE SUMMARY

Westinghouse Electric Company
99900404/2022-201

The U.S. Nuclear Regulatory Commission (NRC) staff conducted a vendor inspection at the Westinghouse Electric Company (WEC) facility in Cranberry Township, PA, to verify that it had implemented an adequate quality assurance (QA) program that complies with the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," 10 CFR Part 21, "Reporting of Defects and Noncompliance."

This technically-focused inspection specifically evaluated WEC's implementation of the quality activities associated with the design, testing and analysis of safety-related fuel assemblies being supplied to U.S. nuclear power plants.

The following regulations serve as the bases for the NRC inspection:

- Appendix B to 10 CFR Part 50
- 10 CFR Part 21

During this inspection, the NRC inspection team used the following Inspection Procedures (Ips): IP 43002, "Routine Inspections of Nuclear Vendors," dated April 5, 2022; and IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," dated May 16, 2019.

The NRC inspection team concluded that WEC's QA policies and procedures comply with the applicable requirements of Appendix B to 10 CFR Part 50 and 10 CFR Part 21, and that WEC's personnel are implementing these policies and procedures effectively. The results of this inspection are summarized below.

Design Control and Test Control

The NRC inspection team reviewed a sample of WEC's calculation notes, guidance, issue reports, and internal correspondence associated with assessing critical heat flux (CHF) correlations to verify compliance with the regulatory requirements of Criterion III, "Design Control," and Criterion XI, "Test Control," of Appendix B to 10 CFR Part 50. The NRC inspection team verified the technical adequacy of the identification, impact, and safety assessment of the ODEN 12 test data on WEC critical heat flux correlations. No findings of significance were identified.

10 CFR Part 21

The NRC inspection team reviewed WEC's policies and implementing procedures that govern the implementation of its 10 CFR Part 21 program to verify compliance with the requirements of 10 CFR Part 21. The NRC inspection team: (1) verified that WEC's nonconformance and corrective action programs provide a link to the 10 CFR Part 21 program; and (2) reviewed a sample of 10 CFR Part 21 evaluations that also included "Significant Condition Adverse to

Quality [SCAQ] of High Significance in Quality Impact” evaluations and “Significant Condition Adverse to Quality of High Significance in Nuclear Regulatory Impact,” performed by WEC. The NRC inspection team also verified that WEC’s nonconformance and corrective action procedures provide a link to the 10 CFR Part 21 program. No findings of significance were identified.

Corrective Action

The NRC inspection team reviewed WEC’s policies and implementing procedures that govern the implementation of its corrective action program to verify compliance with the requirements of Criterion XVI, “Corrective Action,” of Appendix B to 10 CFR Part 50. The NRC inspection team also reviewed a sample of corrective action issue reports (Irs) and confirmed the corrective action Irs were adequately reviewed, implemented, and approved by appropriate personnel in a timely manner. No findings of significance were identified.

REPORT DETAILS

1. Design Control and Test Control

a. Inspection Scope

The U.S. Nuclear Regulatory Commission (NRC) inspection team reviewed WEC's policies and implementing procedures that govern the implementation of its design control program to verify compliance with the requirements of Criterion III, "Design Control," and Criterion XI, "Test Control," of Appendix B to 10 CFR Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities." The NRC inspection team reviewed and evaluated a sample of design documentation associated with the evaluation of critical heat flux (CHF) data from the ODEN 12 tests. Specifically, the NRC inspection team reviewed WEC's calculation notes, guidance, issue reports, and correspondence associated with the identification, impact, and safety assessment of specific critical heat flux correlations.

WEC issued a Nuclear Safety Advisory Letter (NSAL) 14-5, "Lower Than Expected Critical Heat Flux Results Obtained During Departure from Nucleate Boiling Testing," on June 17, 2014, to inform customers about the discovery of a potential non-conservative sub-region in applicable ranges of some WEC CHF correlations. As discussed in a letter to the NRC from WEC dated June 6, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML17159A439), WEC performed the ODEN 12 tests to obtain data in this sub-region where experimental data was lacking.

The NRC inspection team, reviewed WEC engineering documentation on their CHF's correlation's uncertainty in this sub-region. In addition, the NRC inspection team reviewed, the WEC 2016 assessment demonstrating that even under the most severe assumptions about the CHF correlation's performance, there was sufficient margin to CHF. The NRC inspection team reviewed new ODEN test data that would be used to quantify the correlation's uncertainty in that sub-region.

The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

The NRC inspection team reviewed WEC's analysis of the new ODEN data. The NRC inspection team found that WEC appropriately dispositioned the data in an appropriate time frame. Even though the new data revealed that the estimate of the CHF correlation's uncertainties were initially underpredicted in 2016, that 2016 analysis showed that there was still sufficient margin to account for the new higher uncertainties and the use of the CHF correlation would remain acceptable.

The NRC inspection team also reviewed corrective action reports related to the ODEN 12 data, CHF correlations developed with this data, and their future application. These corrective actions reports are still in-process, therefore, the NRC inspection team could not review the resolution. However, the NRC inspection team did review the actions taken and the steps to resolve the item. The NRC inspection team found that WEC is

taking appropriate action to incorporate the test data and address the CHF correlations in the sub-region.

c. Conclusion

The NRC inspection team concluded that WEC is implementing its design control and test control in accordance with the regulatory requirements of Criterion III of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed and activities observed, the NRC inspection team determined that WEC is implementing its policies and procedures associated with design control and test control. WEC is in the process of analyzing the ODEN 12 test data and updating of CHF correlations; therefore, the NRC inspection team was unable to review the final resolution. However, the NRC inspection team determined WEC is taking appropriate action to incorporate the test data and address the CHF correlations. No findings of significance were identified.

2. 10 CFR Part 21

a. Inspection Scope

The NRC inspection team reviewed WEC's policies and implementing procedures that govern the implementation of its 10 CFR Part 21, "Reporting of Defects and Noncompliance," program to verify compliance with the regulatory requirements. The NRC inspection team: (1) verified that WEC's nonconformance and corrective action programs provide a link to the 10 CFR Part 21 program; and (2) reviewed a sample of 10 CFR Part 21 evaluations that also included "Significant Condition Adverse to Quality of High Significance in Quality Impact" and "Significant Condition Adverse to Quality of High Significance in Nuclear Regulatory Impact," evaluations performed by WEC. The NRC inspection team also verified that WEC's nonconformance and corrective action procedures provide a link to the 10 CFR Part 21 program.

In addition, for a sample of 10 CFR Part 21 evaluations performed by WEC, the NRC inspection team verified that WEC had effectively implemented the requirements for evaluating deviations and failures to comply. The NRC inspection team verified that notifications were issued to customers in accordance with the requirements of 10 CFR 21.21, "Notification of Failure to Comply or Existence of a Defect and its Evaluation," as applicable.

The NRC inspection team also discussed the 10 CFR Part 21 program with WEC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

No findings of significance were identified.

c. Conclusions

The NRC inspection team concluded that WEC is implementing its 10 CFR Part 21 program in accordance with the regulatory requirements of 10 CFR Part 21. Based on the limited sample of documents reviewed, the NRC inspection team determined that

WEC is implementing its policies and procedures associated with the 10 CFR Part 21 program. No findings of significance were identified.

3. Corrective Action Program

a. Inspection Scope

The NRC inspection team reviewed WEC's policies and implementing procedures that govern the implementation of its corrective action program to verify compliance with the requirements of Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. The NRC inspection team reviewed WEC's processes and implementing procedures that provide for the identification, documentation, segregation, evaluation, and disposition of items that are addressed through the corrective action program.

The NRC inspection team reviewed a sample of corrective action issue reports and safety evaluations associated with potential issues related to analytical software to confirm that WEC's disposition of the identified issues was in accordance with the applicable procedures and took adequate corrective action to prevent recurrence, as appropriate.

The NRC inspection team also discussed the corrective action program with WEC's management and technical staff. The attachment to this inspection report lists the documents reviewed and personnel interviewed by the NRC inspection team.

b. Observations and Findings

No findings of significance were identified.

c. Conclusion

The NRC inspection team concluded that WEC is implementing its corrective action program in accordance with the regulatory requirements of Criterion XVI of Appendix B to 10 CFR Part 50. Based on the limited sample of documents reviewed, the NRC inspection team determined that WEC is implementing its policies and procedures associated with the corrective action. No findings of significance were identified.

4. Entrance and Exit Meetings

On June 6, 2022, the NRC inspection team discussed the scope of the inspection with Jill Redmon, Executive Vice-President, Quality, Environment, Health and Safety, and other members of WEC's management and technical staff. On June 9, 2022, the NRC inspection team presented the inspection results and observations during an exit meeting with Jill Redmon, and other members of WEC's management and technical staff. The attachment to this report lists the attendees of the entrance and exit meetings, as well as those individuals whom the NRC inspection team interviewed.

Attachment

1. ENTRANCE/EXIT MEETING ATTENDEES

Name	Title	Affiliation	Entrance	Exit	Interviewed
Ken Altemus	Vice President, NFE	Westinghouse Electric Company (WEC)	X*	X	
Doug Weaver	Vice-President Global Nuclear Regulatory Affairs	WEC	X*		
Greg Glenn	Licensing Principal Engineer	WEC	X	X	X
Mathew Symanski	Licensing Intern	WEC	X	X	X
Yixing Sung	Consulting Engineer	WEC	X	X	X
Brian Beebe	CF & SD Director	WEC	X	X	X
Zack Harper	Licensing Manger	WEC	X	X	X
Kent Bonadio	Manager, Transient Analysis	WEC	X	X	
Peter Hilton	Fellow Engineer	WEC	X	X	
Greg Williams	Manager, Fuel Rod & Thermohydraulic Design (FRTHD)	WEC	X*	X	
Parvez Khambatta	Licensing Engineer	WEC	X*	X	X
Mathew Cerrone	Manager, Software & System Technology	WEC	X	X*	
Michael Connor	Fellow Engineer	WEC	X*	X*	
Guireng Pan	Fellow Engineer	WEC	X*		
Lori Lubic	Advanced Project Manager	WEC	X*	X*	
Darrin Smith	Manager, Design & Support	WEC	X*	X*	
Andrew Atwood	Manager, Materials & Fuel Rod Design	WEC	X*	X*	
Camille Zozula	Manager/Interim Director Management Systems and Regulatory Comp	WEC		X*	

Name	Title	Affiliation	Entrance	Exit	Interviewed
Michael Anness	Director Fuel Innovation	WEC	X	X*	
Brent Jeffcoat	Principle Engineer	WEC	X*	X*	
Fredrik Waldemarsson	Development Engineer	WEC – Sweden			X
Henrik Tejne	Manager, Mechanical Construction	WEC – Sweden			X
Greg Williams	Manager, FRTHD	WEC	X	X*	
Zeses Karoutas	Chief Engineer, Nuclear Fuel	WEC		X*	
Olin McRae, III	Manager, Innovation PWR Fuel Technology	WEC	X*	X*	
Andrea Sterdis	Contract Engineer	WEC		X*	
Michael Corletti	Sr Director, Advanced Analysis and Risk Application	WEC		X*	
David Huegel	Fellow Engineer	WEC	X*	X*	
Jill Redmon	Exec. Vice-President Quality, Environment, Health & Safety	WEC	X*	X*	
John R. Lovre	Technician	WEC	X*	X*	
Peter Chan	Vice-President, Global Quality	WEC		X*	
Byron Frank	Fellow Engineer	WEC	X*	X*	
Sukhwans Singh	Principal Engineer	WEC	X	X*	X
Carrie Wood	Principal Engineer	WEC	X*	X*	X*
Dustin Staub	Principle Engineer	WEC	X*	X*	
Vincent Penkrot	Fellow Engineer	WEC	X	X*	
Paul Evans	Fellow Engineer	WEC	X*		
Bill Bordogw	Technician	WEC	X		
Dena Litwiler	Sr. Manager, D&I	WEC	X		
Kerri Kavanagh	Branch Chief	Nuclear Regulatory Commission (NRC)		X*	
Andrea Keim	Inspector	NRC	X	X	

Name	Title	Affiliation	Entrance	Exit	Interviewed
Paul Prescott	Inspector	NRC	X*	X*	
Joshua Kaizer	Inspector/Technical Expert	NRC	X	X	
Reed Anzalone	Inspector/Technical Expert	NRC	X*	X*	

* Present via telephone

2. INSPECTION PROCEDURES USED

Inspection Procedure (IP) 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," dated February 13, 2012

IP 43002, "Routine Inspections of Nuclear Vendors," dated January 27, 2017

3. DOCUMENTS REVIEWED

Procedures and Instructions

- Westinghouse Quality Management System -A, Revision 8.0, dated May 22, 2020
- W2-5.1-101, "Westinghouse Corrective Action Program Procedure," Revision 8, dated September 1, 2021
- W2-5.1-101.W01, "Submitting a Corrective Action Program Issue Report," Revision 2.3, dated January 3, 2022
- W2-5.1-101.W02, "Screening a Corrective Action Program Issue Report," Revision 3.1, dated January 3, 2022
- W2-5.1-101.W03, "Issue Review Committee Work Instruction," Revision 4.2, dated January 3, 2022
- W2-5.1-101.W08, "Corrective Action Review Board Work Instruction," Revision 2.0, dated February 28, 2020
- W2-5.1-101.W09, "CAP Issue Management Work Instruction," Revision 2.0, dated January 3, 2022
- W2-5.1-101.W10, "CAP Trending Program Work Instruction," Revision 3.0, dated April 13, 2022
- W2-5.1-101.W11, "Causal Analysis Work Instruction," Revision 1.1, dated June 30, 2021
- W2-5.1-101.W12, "CAP Planned Aging Process," Revision 0.1, dated September 1, 2021
- W2-5.1-201, "Identification and Reporting of Conditions Adverse to Nuclear Safety," Revision 2.1, dated October 6, 2021
- W2-5.1-201.W01, "Nuclear Safety Review Staff Work Instruction," Revision 2.1, dated April 22, 2020
- W2-5.1-201.W02, "10 CFR 21 and 10 CFR 50.55(e) Posting," Revision 0.0, October 6, 2021
- W2-8.1-100, "Design and Development Process," Revision 0.1, dated February 29, 2016
- W2-8.1-101, "Design and Development," Revision 3.1, February 27, 2018
- W2-8.3-100, "Design Analysis and Outputs Process," Revision 0.0, August 15, 2016
- W2-8.3-101, "Design Analysis," Revision 3.0, dated June 12, 2018

- W2-8.4-103, "Design Testing," Revision 1.0, dated November 6, 2018
- W2-8.5-100, "Design Change Control Process," Revision 0.0, dated August 15, 2016
- W2-8.6-100, "Software and Computer Systems Control Processes," Revision 1.0, dated September 4, 2018
- W2-8.6-104, "Software Problem Reporting," Revision 1, September 4, 2018
- W2-9.14-100, "Control of Nonconforming Process Outputs, Products and Services," Revision 2, dated February 27, 2018
- W2-9.4-102, "Deviation Notices," Revision 2.2, dated March 7, 2022
- EP-116, "Issue Reporting," Revision 25.0, dated October 30, 2019
- EP-201, Test Prospectus and Test Report," Revision 27.4, dated October 30, 2019

Safety Reports, Calculation Notes, Test Data

- LTR-SRC-21-18, "Nuclear Safety Evaluation for IR 2021-5074, Watts Bar Unit 2 Shield Wall Restraint Shims not Installed," dated July 1, 2021
- LTR-SRC-21-25, "Nuclear Safety Evaluation for IR 2021-9154, Pellet Lot Nitrogen Exceeds Limit," dated November 5, 2021
- LTR-SRC-21-26, "Nuclear Safety Evaluation for IR 2021-9812, Cat A STI-29575 STAV7 Calculates the Hot Free Volume Incorrectly," dated December 2, 2021
- MT-16-37, Input to Nuclear Safety Assessment – Potential Risk of WRB-2 Over-Prediction of DNBR Margin in 17x17OFA/IFM Thimble Subchannel (CAPAL# 100362765), dated March 8, 2016
- ODEN Temperature Traces for 12.2 Runs
- BTK-19-0272, ODEN Data Report – CHF Testing of VANTAGE 5 Fuel with IFM Thimble Cell Configuration and Cosine Axial Power Shape ODEN 12.0 and ODEN 12.2, dated June 3, 2019
- CF-NF-PE-19-23, "VIPRE-W Assessment of Oden 12.0 and 12.2 Test Data with the WRB-2 DNB Correlation - Typical 14- Channel (Plant) and 36-Channel ODEN (5x5 Test) Models," dated February 19, 2020
- CN-GEN-THD-305, "Evaluation of ODEN 12 DNB Test Data Using WRB-2 Correlation," dated April 21, 2020
- CN-GEN-THD-324 - Draft, "Comparison of Rector 14- Channel Correlation Predicted Uniform Critical Heat Flux to Measured Test Data for VANTAGE 5 fuel", dated November 18, 2020
- PFT-21-51, Rev 1. Regression results for Local Quality (linear) and the HZb term (Power) for the WOFA and WNG-2 correlation database, dated September 3, 2021
- Power Point Presentation, "Challenge Points," dated January 2022
- Power Point Presentation, "Input Uncertainty in PWR CHF Model Development," dated January 2022
- CN-GEN-THD-328 - Draft, "WOFA DNB Correlation Sensitivity Study for Vantage 5 fuel," dated February 2, 2021
- PFT-22-10, Calculation of WTDP DNBR Limits for Correlations with HZb term including WOFA, dated March 17, 2022

Corrective Action Issue Report Opened During the NRC Inspection

None

Software Technology Issues

- Software Technology Issue (STI)-29284/CE-21-046, "BYPASS Code Wall Temperature in Pressure Drop Calculation for Non-Isothermal cases" dated January 27, 2021
- STI-29323/CE-21-119, "WARP 1.2.0 Does not allow for Xenon Feedback to be Removed while using the Feedback Input Structure," dated March 2, 2022
- STI-29339/CE-21-127, "Error in THSCRN Pin Swap Technique when Swapping Pin from Assembly Peripheral to Interior Locations," dated March 9, 2021
- STI-29551/CE-21-449, "Inconsistent Radial Peak Usage in THSCRNH VIPRE-W Model Setup for Assemblies on the Line of Symmetry," dated August 23, 2021

Corrective Action Reports

- Issue Report (IR) 2021-5074, "Licensing Basis Analysis for Short Term LOCA Mass and Energy for the Cold Leg Break Area of 127 sq. inches in the DBA Incorrect," dated May 3, 2021
- IR 2021-9154, "Rejectable Nitrogen Result Recorded for Pellet Lot," dated August 23, 2021
- IR 2021-9812, "Cat A STI-29575 STAV7 seems to Calculate the Hot Free Volume Incorrectly," dated September 10, 2021
- IR 2021-10857, "VVER Mid Grid Outer Strap Seam – Unsupported Edge," dated October 5, 2021
- IR 2021-3141, "Unexplained CFFF LOCA Burst Test Results," dated August 3, 2022
- IR 2021-3330, "Wolf Creek unable to Implement Updated BEACON nocolr File due to Software Error," dated April 11, 2022
- IR 2021-6281, "Wrong Placement of Fuel Rods According to Assembling Record," dated June 1, 2021
- IR 2022-2866, "Non-conservative Critical Heat Flux Predictions with WRB-2 and WRB-2M Correlations for 10-inch Spacing at high inlet temperature and nominal flow conditions," dated March 28, 2022
- IR-2022-2365, "Non-conservative Critical Heat Flux Predictions at High Inlet Temperatures and Nominal Flow – WSSV," dated March 28, 2022