Commonwealth Edison Company 1400 Opus Place Downers Grove, IL 60515-5701

October 27, 1999



United States Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001

> Braidwood Station, Units 1 and 2 Facility Operating License Nos. NPF-72 and NPF-77 NRC Docket Nos. STN 50-456 and STN 50-457

> Byron Station, Units 1 and 2 Facility Operating License Nos. NPF-37 and NPF-66 NRC Docket Nos. STN 50-454 and STN 50-455

Subject: Supplemental Information Regarding a Request for Additional Information Related to NRC Generic Letter 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions"

- References: (1) Letter from J. Hosmer (ComEd) to USNRC, "ComEd response to NRC Generic Letter 96-06, 'Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions," dated May 2, 1997
 - (2) NRC Generic Letter 96-06, Supplement 1: "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions," dated November 13, 1997
 - Letter from J. B. Hickman (NRC) to O. D. Kingsley (ComEd),
 "Request for Additional Information Related to the Generic Letter (GL)
 96-06 Response for Byron Station, Units 1 and 2 and Braidwood
 Station, Units 1 and 2," dated May 1, 1998
 - (4) Letter from R. M. Krich (ComEd) to USNRC, "Response to Request for Additional Information Generic Letter 96-06: 'Assurance of Equipment Operability and Containment Integrity during Design-Basis Accident Conditions," dated August 27, 1998
 - (5) Letter from B. A. Wetzel (NRC) to K. J. Modeen (Nuclear Energy Institute), "Review of EPRI Technical Report TR-108812," dated October 1, 1998
 - (6) Letter from R. M. Krich (ComEd) to USNRC, "Deferral of Supplemental Information for Request for Additional Information, Generic Letter 96-06, 'Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions," dated February 26, 1999

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In Reference 1, Commonwealth Edison (ComEd) Company provided the initial response to NRC Generic Letter 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions." Generic Letter 96-06, Supplement 1 (i.e., Reference 2) was issued by the NRC on November 13, 1997, which allowed the use of acceptance criteria defined in the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section III, "Rules for Construction of Nuclear Power Plant Components," Appendix F, "Rules for Evaluation of Service Loadings with Level D Service Limits." In Reference 3, the NRC requested that ComEd provide additional information. Reference 4 provided some of the requested additional information. However, we noted that our response would be supplemented by February 26, 1999, in order that analytical solutions employing the permanent use of the acceptance criteria contained in the ASME B&PV Code, Section III, Appendix F may be pursued, consistent with the NRC guidance of Reference 2. Reference 6 notified the NRC that the supplemental information would be delayed until October 27, 1999, as the ASME B&PV Code, Section III, Appendix F analysis work for containment penetrations P-5, P-8, P-37, P-55, P-70 and P-71, was delayed in order to address further questions raised by the NRC in Reference 5.

The attachment to this letter provides the information for the ASME B&PV Code, Appendix F analyses. Additionally, this response provides a summary update of the activities that have been undertaken to assure containment integrity as previously described in Reference 4.

Should you have any questions regarding this matter, please contact Mr. J. A. Bauer at (630) 663-7287.

Respectfully,

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R. M. Krich Vice President – Regulatory Services

Attachment

cc: Regional Administrator – NRC Region III NRC Senior Resident Inspector – Braidwood Station NRC Senior Resident Inspector – Byron Station bcc: NRC Project Manager – NRR – Byron and Braidwood Stations Office of Nuclear Facility Safety – IDNS Site Vice President – Braidwood Station Site Vice President – Byron Station Vice President – Regulatory Services Regulatory Assurance Manager – Braidwood Station Regulatory Assurance Manager – Byron Station Director, Licensing and Compliance – Braidwood and Byron Stations ComEd Document Control Desk Licensing (Hard Copy) ComEd Document Control Desk Licensing (Electronic Copy)

Attachment

Supplemental Information Regarding a Request for Additional Information NRC Generic Letter 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions" Byron and Braidwood Stations

In the Commonwealth Edison (ComEd) Company submittal dated May 2, 1997 the following containment penetrations were identified as being susceptible to the overpressurization conditions discussed in Generic Letter (GL) 96-06. The penetrations and associated system descriptions are as follows.

- P-5, P-6, P-8 and P-10 Containment Chilled Water System
- P-11 Reactor Coolant Drain Tank Pump Discharge
- P-24 Component Cooling Water Return From the Reactor Coolant Pump Thermal Barrier Heat Exchanger
- P-30 Containment Demineralized Water Supply
- P-32 Fuel Pool Cooling Return to Refueling Cavity
- P-34 Containment Fire Protection Supply
- P-37 Reactor Coolant System Loop Fill Header
- P-44 Primary Water Supply to Reactor Coolant Pump Seal # 3 and Pressurizer Relief Tank
- P-47 Containment Floor Drain Sump Pump Discharge
- P-55 Safety Injection Accumulator Fill Line
- P-57 Fuel Pool Cooling Suction from Refueling Cavity
- P-70 Process Sampling
- P-71 Chemical and Volume Control System Normal Charging Flow Path

These penetrations generally have a containment isolation valve on each side of the containment wall which is closed during normal operation (i.e., P-30, P-32, P37, P-55, P-57 and P-70) or automatically closes on a containment isolation signal (i.e., P-5, P-6, P-8, P-10, P-11, P-24, P-34, P-44, P-47, and P-71). These penetrations could be potentially heated during a Loss of Coolant Accident (LOCA) or a Main Steam Line Break (MSLB) inside containment, either of which would provide the containment isolation signal.

The overpressure mitigation methodologies for these penetrations susceptible to overpressurization fall into three categories as listed below.

- A. Design changes are required to mitigate thermally induced overpressure conditions. Nine penetrations fall into this category (i.e., P-5, P-6, P-8, P-10, P-11, P-24, P-34, P-44, and P-47).
- B. Overpressure conditions that are intended to be mitigated by either procedural changes for valve lineups or penetration draining. Three penetrations fall into this category (i.e., P-30, P-32 and P-57).
- C. Pursue analytical solution employing American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV), Section III, "Rules for Construction of Nuclear Power Plant Components," Appendix F, "Rules for Evaluation of Service Loadings with

Level D Service Limits," to qualify the penetrations for overpressure conditions. Four penetrations fall into this category (i.e., P-37, P-55, P-70 and P-71).

A summary of each of these mitigation methodologies is provided below.

A. Design Changes

(Note there are no differences in the design changes for the four Byron and Braidwood Units. Unit 1 component numbers are used; Unit 2 component numbers are similar.)

Penetrations P-6 and P-10 – Containment Chilled Water System

- Relief valves are being installed inside containment on the downstream side of the inner containment isolation check valves, 1WO007A (i.e., penetration P-6) and 1WO007B (i.e., penetration P-10). This configuration will allow pressure relief through these check valves into the containment and still maintain the valves' containment isolation function. The size of the relief valves to be installed are 1" x 1 1/2". Drawings for these penetrations will be updated and are located in the Updated Final Safety Analysis Report (UFSAR), Figure 9.2-16, Sheet 2.
- These modifications have been installed in Braidwood Station, Units 1 and 2, and Byron Station, Unit 1. For Byron Unit 2, this modification is currently scheduled to be installed during the refueling outage in the fall of 1999.

Penetrations P-5 and P-8 – Containment Chilled Water System

- In our May 2, 1997 submittal, we stated that an analytical solution employing ASME Section III Appendix F was being pursued for these penetrations. Based on the results of the analyses, we have determined that these penetrations could not be qualified under the Appendix F criteria, consequently, design changes are being planned for these penetrations.
- Relief valves are being installed inside containment between containment isolation valves 1WO056A and 1WO020A (i.e., penetration P-5), and 1WO056B and 1WO020B (i.e., penetration P-8). This configuration will allow for thermal pressure relief of the isolated piping section through the relief valve. The size of the relief valves to be installed are 3/4" x 1". Drawings for these penetrations will be updated and are located in the UFSAR, Figure 9.2-16, Sheet 2.
- For Braidwood Station, these modifications are currently scheduled to be installed during Unit 1 refueling outage in the spring of 2000, and the Unit 2 refueling outage in the fall of 2000. For Byron Station, these modifications are currently scheduled to be installed during the Unit 1 refueling outage in the fall of 2000, and the Unit 2 refueling outage in the spring of 2001.

Penetration P-11 – Reactor Coolant Drain Tank Pump Discharge

- A relief valve is being installed inside containment between isolation valves 1RE1003 and 1RE9170. This configuration will allow for thermal pressure relief of the isolated piping section through the relief valve. The size of the relief valve to be installed is 3/4" x 1". The attached Piping and Instrumentation Diagram (P&ID) M-70, Sheet 1, will be updated and shows the configuration for this penetration.
- These modifications have been installed in Braidwood Station Unit 2 and Byron Station Unit 1. For Braidwood Station Unit 1, the modification is currently scheduled to be

installed during the spring 2000 refueling outage. For Byron Station Unit 2, the modification is currently scheduled to be installed during the fall 1999 refueling outage.

Penetration P-24 – Component Cooling Water Return From the Reactor Coolant Pump Thermal Barrier Heat Exchanger

- This penetration has been evaluated as having adequate overpressure protection based on the existing configuration of the installed piping system. The 3/4" bypass line, 1CC52B, installed on the penetration piping allows pressure to be released into containment. This drawing is located in the UFSAR, Figure 9.2-3, Sheet 1.
- The modifications originally planned were to ensure that motor operated valve, 1CC685, (i.e., the outside containment isolation valve for P-24) would be capable of opening against the maximum possible pressure of 2485 psig. It has since been determined that, based on the actuator upgraded to address GL 89-10 concerns, valve 1CC685 is capable of opening against the worst-case pressure condition. Therefore, no modification of the piping associated with containment penetration P-24 will be made.

Penetration P-34 – Containment Fire Protection Supply

- A relief valve is being installed inside containment on the downstream side of the inner containment isolation check valve, 1FP345. This configuration will allow pressure relief through the check valve into containment and still maintain the valve's containment isolation function. The size of the relief valve to be installed is 3/4" x 1". The drawing for this penetration is located in the Byron/Braidwood Station Fire Protection Report, Appendix 5.0, Figure M52, Sheet 1, and will be updated to reflect this modification.
- These modifications have been installed in Braidwood Station Units 1 and 2, and Byron Station, Unit 1. For Byron Station, Unit 2, this modification is currently scheduled to be installed during the refueling outage in the fall of 1999.

Penetration P-44 – Primary Water Supply to Reactor Coolant Pump Seal # 3 and Pressurizer Relief Tank

- A 1/2" by-pass line with a spring loaded check valve is being installed inside containment around diaphragm valve, 1RY8030, which is downstream of containment isolation check valve, 1RY8046. Note that valve 1RY8030 is not a containment isolation valve, but is normally closed and can consequently result in pressure buildup in the isolated section of piping between inside containment isolation check valve, 1RY8046, and outside containment isolation valve, 1RY8028. This configuration will allow pressure relief into the Pressurizer Relief Tank (PRT) and assure the integrity of the penetration piping. The drawing for this penetration is located in UFSAR, Figure 5.1-1, Sheet 8, and will be updated to reflect this modification.
- These modifications have been installed in Braidwood Station Units 1 and 2, and Byron Station Unit 1. For Byron Station Unit 2, this modification is currently scheduled to be installed during the refueling outage in the fall of 1999.

Penetration P-47 -- Containment Floor Drain Sump Pump Discharge

• A relief valve is being installed inside containment between containment isolation valves 1RF026 and 1RF027. This configuration will allow for thermal pressure relief of the isolated containment piping section through the relief valve into containment. The size of the relief valve to be installed is a 3/4" x 1". Drawings for this penetration are located in UFSAR, Figure 11.2-7, Sheets 1 and 2, and will be updated to reflect this modification.

 These modifications have been installed in Braidwood Station Unit 2 and Byron Station Unit 1. For Braidwood Station Unit 1, the modification is currently scheduled to be installed during the refueling outage in the spring of 2000. For Byron Station Unit 2, the modification is currently scheduled to be installed during the refueling outage in the fall of 1999.

B. Procedural Changes or Draining

Note: Unit 1 component numbers are listed; the Unit 2 component numbers are similar.

Penetration P-30 – Containment Demineralized Water Supply

- For Braidwood Station, valve 1WM192A will be left open during normal operation. This valve is located inside containment and provides a path from the demineralized water (WM) system, which is isolated to the containment during normal operation, to the containment atmosphere. This configuration will allow pressure relief through containment isolation check valve, 1WM191, into containment and still maintain the check valve's containment isolation function. The Braidwood Station operating mechanical lineup procedure for the WM system has been revised to require valve 1WM192A to be left in the open position during normal power operation. This methodology has been employed at Braidwood Station since return-to-service from the Unit 1 refueling outage in the spring of 1997, and the Unit 2 refueling outage in the fall 1997.
- Byron Station has chosen to procedurally drain the WM penetrations. The Unit 1
 penetration was drained during the refueling outage in February 1998, and the Unit 2
 penetration was drained during the refueling outage in May 1998, using Byron special
 process procedures. The Byron Station operating procedures have been revised and
 are currently used to drain the WM penetrations after each refueling.
- Note that the Braidwood Station and Byron Station methodologies are different; however, the end result in both cases is acceptable because penetration P-30 is precluded from thermal overpressurization. UFSAR, Figure 9.2-4, Sheet 1 shows the configuration for this penetration.

Penetrations P-32 and P-57 – Fuel Pool Cooling Return to/from Refueling Cavity

- These penetrations are used only during refueling activities when the refueling cavity in containment is filled. Thermal overpressure mitigation for these penetrations is accomplished by draining the penetrations after refueling activities are completed and the containment refueling cavity has been drained.
- At both Braidwood and Byron Stations, procedural controls have been implemented to
 ensure draining of penetrations P-32 and P-57 after use during outage periods prior to
 returning the plant to power operations. Draining activities for these penetrations have
 been implemented at Braidwood Station since the return-to-service from the 1997
 refueling outages for Units 1 and 2, and at Byron Station since the return-to-service from
 the 1998 refueling outages for Units 1 and 2. UFSAR, Figures 9.1-8, Sheet 2 and Sheet
 1, show the configurations for these penetrations, respectively.

C. Analytical Solution Employing ASME B&PV Code, Section III, Appendix F Criteria

The following provides the available information for each penetration. Braidwood Station, Unit 1 information is provided. This information is considered to be typical of the four Braidwood Station and Byron Station units. All four units have similar configurations.

Penetration 37 – Reactor Coolant System Loop Fill Header

• This penetration contains one process line, 1CV43A-2", between isolation valves 1CV8346 and 1CV8348. Drawings are located in the UFSAR, Figure 9.3-4, Sheet 5.

Penetration 55 – Safety Injection Accumulator Fill Line

This penetration contains two process lines, 1SI49B-3/4" and 1SI23B-3/4", bounded by isolation valves 1SI8871, 1SI8964, 1SI8961, 1SI011 and 1SI8888. Drawings are located in the UFSAR, Figure 6.3-1, Sheets 4 and 6.
 Note that a nitrogen supply line, 1SI71C-1", also passes through this penetration. This line is not affected by the thermal overpressure condition.

Penetration 70 – Process Sampling

- This penetration contains four process lines: 1PS183A-3/8", 1PS184A-3/8", 1PS185A-3/8", and 1PS186A-3/8".
- Only process line 1PS185A-3/8", sampling line from the accumulator tanks, is susceptible to thermal overpressurization. At Braidwood Station this is a 3/8" tubing line. At Byron Station, there is a section of 1" pipe, 1PS185C-1" and 1PS185D-1", adjacent to each of the containment isolation valves prior to the beginning of the 3/8" tubing. Byron Station Unit 1 has the longest run of piping and tubing which make Byron Unit 1 more susceptible to thermally induced overpressure. This line is bounded by isolation valves 1PS9357A and 1PS9357B. See attached drawing M-68, Sheet 1B for the more limiting Byron Unit 1 configuration.
- The other three lines are: 1PS183A-3/8", sampling line from pressurizer steam; 1PS 184A-3/8", sampling line from the pressurizer liquid; and 1PS186A-3/8", sampling line from Reactor Coolant System Hot and Cold Legs. The normal process fluid temperatures for these lines are higher than the containment ambient temperature under design basis accident conditions and therefore thermally induced overpressure is not an issue.

Penetration 71 – Chemical and Volume Control System Normal Charging Flow Path

• This penetration contains one process line, 1CV09D-3", bounded by isolation valves 1CV8105, 1CV8324A and 1CV8324B. Note that this process line is also labeled as 1CV09E-3" inside the containment. Drawings are located in the UFSAR, Figures 9.3-4, Sheets 5 and 8.

Design Criteria

All the lines, between and including the respective containment isolation valves, are classified as ASME Section III Class 2.

Loading Combinations

The following loads are combined in the evaluation.For Piping:Pressure caused by thermal overpressurization + Dead Weight (DW)For Pipe Supports:Weight + Thermal Expansion (Normal Condition) + LOCA (Pipe
Rupture or Dynamic Effects)For Penetrations:Thermal Overpressurization + Weight + Safe Shutdown Seismic (SSE)

The design data for these process lines are listed in the following table.

Penetration	Pipeline Number	Size Schedule	Design Temperature (°F)	Design Pressure (Psig)	Applicable Drawing # (drawings attached)
P-37	1CV43A	2" – 160	200	2485	PG-2546A-98, PG-2546C-32
P-55	1SI49B	3/4" – 160	200	2485	PG-2539A-29, PG-2539C-33A
	1SI23B	3/4" – 160	200	2485	PG-2539A-31, PG-2539A-23
					PG-2539A-38, PG-2539A-28
P-70	1PS185A	3/8" – *	300	700	
	1PS185C	1" – 160	300	700	S-PS-001-14
	1PS185D	1" – 160	300	700	S-PS-001-17
P-71	1CV09D	3" – 160	200	2485	1A-CV-2
	1CV09E	3" – 160	200	2485	1C-CV-41, 1C-CV-38

* The 3/8" tubing is 16BWG tubing.

Pipe Size and Material and Valve requirements

- 3" Piping: Schedule 160, ASME SA-376, Gr. TP304 and/or SA-312, Gr. TP304.
- 1/2" to 2" Piping: Schedule 160, ASME SA-376, Gr. TP304 and/or SA-312, Gr. TP304
- Valves:
 - Sizes 8 in. and smaller: Body and Bonnet Material forged or cast alloy steel;
 - ASME SA-182, Gr. F304 or F316 or SA-351, Gr. CF8 or CF8M Pressure Rating: 1500 lb. Rating
- Fittings:
 - Sizes 2 in. and smaller: Socket-weld, 6000 lb. Std. ASME SA-182, Gr. F304
 - Sizes 2 1/2 in. through 8 in.: Butt-weld, ASME SA-403, Gr. WP304 or WP316
- 3/8" size tubing:
 - Tubing: Stainless Steel, SA-213, Gr.. TP316, the wall thickness is 0.065" (16 BWG)
 - Fittings: Forged or wrought. ASME SA-182, SA-403, or SA-469, Type 316
 - Valves: Type 316 stainless steel, ASME SA-182, Gr. F316 or SA-351 Gr. CF8M

Calculations

Four calculations were performed to evaluate the structural adequacy of the pipe segments in these penetrations to withstand the overpressure condition. The first calculation determined the magnitude of temperature increase in the isolated pipe during a LOCA or a MSLB. The second calculation developed true stress – true strain curves for A106B and TP304 materials based on the NRC's Piping Fracture Mechanics (i.e., PIFRAC) Database. The stress-strain properties developed were used in the next two calculations. The third calculation developed a 2D-thick

shell finite element model and validated the model against the Electric Power Research Institute (EPRI) analysis report, TR-108812, "Response of Isolated Piping to Thermally Induced Overpressurization During a Loss of Coolant Accident (GL 96-06)", dated December 1997, which was developed specifically to address GL 96-06 issues. The 2D-thick shell finite element model is then used, in the next calculation, to determine the volumetric expansion of the pipe segments under pressure and temperature. The fourth calculation evaluated the penetration areas (i.e., piping, valves, fittings and penetrations) for thermal overpressurization following a LOCA or MSLB. This calculation determined the equilibrium pressure within the isolated pipe segments and calculated the piping stresses. The pressure stresses are combined with other concurrent loads and compared to the requirements of ASME B&PV Code, Section III for level D (i.e., faulted) conditions using ASME B&PV Code, Section III, Appendix F acceptance criteria.

Detailed descriptions for each of these four calculations are provided below.

Calculation 1 – Thermal Heat-up of Isolated Pipe Running Through Penetrations

This calculation determined the temperature increase that occurred in the isolated pipe in containment for P-5, P-8, P-37, P-55, P-70 and P-71 during a LOCA or MSLB. The transient thermal-hydraulic software package, RELAP5/MOD3.2, was used in this analysis to determine the amount of temperature increase in the isolated sections of pipe during a LOCA or MSLB scenario. Different RELAP models were developed to represent each of the six penetrations. Review of the piping configurations for all four Byron and Braidwood Station units showed there are no significant differences among the units except for the pipe running through penetration P-70. For configurations with no significant differences, the Braidwood Station, Unit 1 geometries were used in the RELAP models. The pipe running through P-70 at Byron Station, Unit 1 has a substantially greater length inside the containment than the other three units. The geometry of the pipe running through P-70 in Byron Station, Unit 1 is used in the RELAP models.

The main component in all of these models represents the pipeline that goes through the penetration. The pipe component follows the geometry of the pipe section from the isolation valve immediately outside of the containment penetration to the isolation valve immediately inside the containment penetration. The changes in orientation of the pipe were modeled as was the resistance associated with the individual elbows.

The next major component of the RELAP models is the time dependent volume representing the environment inside the containment during the LOCA/MSLB. The temperature versus time curves used to describe the LOCA and the MSLB scenarios are the steam temperature curves shown the UFSAR, Figure 6.2-8 and Figure 6.2-14b, respectively. The containment was modeled as an all steam environment at saturation conditions in order to maximize the heat transfer to the isolated pipes. The other time dependent volume in the models represents the areas outside of containment in which the outboard sides of the pipes that pass through the subject penetrations are located. The temperature for these outside containment environments was set to the maximum Environmental Qualification (EQ) temperature of 118°F. This environment was also modeled as an all steam environment.

The last major components of the RELAP models are the heat structures through which heat is transferred from the time dependent volumes representing the LOCA and MSLB environments to the isolated pipe component. The first heat structure represents the pipe wall and the insulation on the isolated portion of the pipe outside of the containment. The second heat

structure represents the pipe wall and the insulation on the isolated portion of the pipe inside the containment. In all cases the geometry of the heat structures follow the geometry of the pipe component. With the exception of P-5 and P-8, all the isolated pipe segments are non-insulated stainless steel pipe. Isolated pipe associated with P5 and P8 are carbon steel pipe with antisweat insulation. Four materials are used in the heat structures through which heat is conducted from the LOCA and MSLB environments to the section of the isolated pipe. These are 304 stainless steel, 316 stainless steel, 106 carbon steel, and high density fiberglass (i.e., antisweat) insulation.

The convective heat transfer correlations and the condensation heat transfer correlations built into RELAP were used in the calculation. These condensation correlations have conservatively predicted heat transfer coefficients as high as 600 BTU/hr-ft²-⁰F in these models. This is higher than the heat transfer coefficients from the coefficients predicted by the well-established and commonly used Uchida heat transfer correlation.

The resulting maximum temperatures that the isolated pipes experience during the LOCA and MSLB scenarios are summarized below.

Penetration	Initiai Temperature (°F)	Maximum Normal Operating Pressure (psig)	Maximum Volumetrically Averaged Temperature (°F) (MSLB)	Maximum Volumetrically Averaged Temperature (°F) (LOCA)				
P-5	47	100	49	145				
P-8	47	100	49	141				
P-37	78	2600	215	241				
P-55	47	1600	173	165				
P-70	65	700	290	249				
P-71	92	2600	234	262				

Note that penetrations P-5 and P-8 were originally included in the group of penetrations to be evaluated in accordance with ASME B&PV Code, Section III, Appendix F criteria. Based on the results of the thermal heat up calculation and some preliminary pipe stress evaluation based on the increased pressure, it was determined that penetrations P-5 and P-8 could not be qualified under the Appendix F criteria. As discussed in the "Design Changes" section of this response, relief valves will be installed on the isolated pipe segments for these penetrations.

Calculation 2 – Development of True Stress / True Strain Curves for A106B and TP304 Materials

The Byron and Braidwood Stations Certified Piping Design Specifications permit the use of the 1977 Edition of ASME B&PV Code, Section III with Addenda through Summer 1979. Appendix F is a non-mandatory appendix to this Code and discusses rules for evaluation of Level D service limits. Loads in Appendix F can be evaluated on an elastic or inelastic system basis. For an inelastic system analysis, Appendix F provides rules in Paragraph F-1324 for accepting the resulting stresses. However, Appendix F also permits an alternative set of rules to be used for piping as noted in Paragraph F-1360, which refers back to the Class 1 rules of ASME Section III, Subsection NB, "Class 1 Components." (Note that Appendix F was originally written

for Class 1 vessels.) There were two evaluations required, one for allowable pressure and the other for general piping stresses.

An inelastic system analysis was used due to the fact that the pipe was allowed to yield. The yielding of the pipe was also used to predict the final equilibrium pressure between the pipe and the water, as shown in Calculation # 4. In order to perform an elastic-plastic analysis, stress-strain properties were needed. As required in Appendix F, Paragraph F-1322, the stress-strain curve used must be documented. As also required in the same paragraph, the allowable stresses must be based on the published Code minimum values. In reality, materials are typically stronger than the Code minimums. In order to meet Code requirements, the analysis used a realistic stress-strain curve to predict the final pressure and then conservatively used Code allowables at temperature as acceptance criteria.

Since actual stress-strain data for the piping was not available, data was obtained from the NRC PIFRAC database. This database provided stress-strain properties at ~76°F and ~300°F for carbon steel (i.e., A106B) and stainless steel (i.e., TP304), based on tensile tests done for the NRC Piping Fracture Mechanics Database. The desired properties were at various temperatures; therefore, linear interpolation was used to obtain the properties at the desired temperature. Since yield strength for 304SS changes significantly between room temperature and 200°F (i.e., changes approximately 15%), and more slowly between 200 °F and 300°F, the use of linear interpolation resulted in raising the stress-strain curve (i.e., making the material stiffer), which was conservative. Note that since the material properties for TP304 and TP316 are similar, the strain-stress properties for material TP304 were applied to TP316.

Calculation # 3 - Benchmark of ANSYS Finite Element Model

In the EPRI response to the NRC concerns about the use of strain criteria without considering all concurrent loads (i.e., EPRI Analysis Report TR-108812), a simplified bounding analysis based on thin wall shell theory was used with axial compression loads equivalent to 0, 6 and 10 ksi superimposed. EPRI concluded that axial compression will have the greatest impact on plastic hoop strains (i.e., produces higher strains). ComEd decided to pursue an Appendix F analytical solution to the overpressurization issue, but use the accepted stress criteria in Appendix F, rather than a strain criteria. To validate the EPRI analysis, the ANSYS computer code was used to generate a three-dimensional (3-D) finite element model of a thin shell cylinder. This model utilized elastic-plastic analysis including large deflection and large strain effects. This model was used to run three loading conditions: pressure alone: pressure with axial compression; and pressure with bending. The closed form solution for plastic hoop strain under internal pressure with and without a sustained axial stress was used to benchmark the finite element model. The closed form solution was taken from Chapter 5 of a textbook by Jack A. Collins. "Failure of Materials in Mechanical Design," Second Edition. Plastic hoop strains were determined at incremental pressures and compared to the closed form solution at the same pressures. Once the benchmark was completed, a sustained bending stress of 10 ksi was applied to the ANSYS model, and a third analysis was made to determine the effects of bending on the plastic hoop strain.

Two additional evaluations were performed using the 3-D shell model. First, hoop strains were calculated at various pressures using the closed form solution with a 10 ksi axial compression stress, a 10 ksi axial tension stress, and no axial stress. This showed that the hoop strains, due to bending, fall between those due to pure compression (i.e., the maximum strain) and pure tension (i.e., the minimum strain). Second, the displaced area was calculated for bending stress

superimposed with internal pressure. This was done to ensure that the displaced crosssectional area did not significantly change due to bending. This conclusion was utilized in the piping qualification calculation as shown in Calculation # 4.

An ANSYS two-dimensional (2-D) axisymmetric model was also developed in order to evaluate thick shell cylinders. This model also used elastic-plastic analysis with large deflection and large strain effects. Plastic hoop strains were determined from the 2-D axisymmetric model. Since the results of the 2-D axisymmetric model matched closely to those from the 3-D thin shell model, the 2-D model was used in subsequent analyses.

The results of these evaluations are as follows:

- Very good correlation was shown between the closed form solution and the ANSYS benchmark solution for hoop strain with and without an axial compressive stress. This allowed for an axial vs. bending stress check to be performed using the ANSYS model.
- Applying 10 ksi of axial compression had the worst effect on hoop strains compared to axial tension or bending.
- The change in cross sectional area due to adding a bending stress to the internal pressure was negligible (i.e., increased less than 3% at 5000 psi). In addition, as pressure was increased to 8000 psi, the change in deformed area due to bending decreased. This result showed that using standard section properties in the piping qualification was appropriate.

Note that the pressure vs. hoop strain comparison was performed for a 10 ksi applied stress or lower. A review of the detailed piping analyses for Byron and Braidwood Stations penetrations P-37, P-55, P-70 and P-71, showed that the maximum pressure plus dead weight stresses are 10 ksi or less. Therefore, the benchmark conclusions are valid. Also note that the conclusions above are valid up to 6.5% membrane hoop strain, the maximum reached in the ANSYS model. The maximum membrane hoop strain reached under the equilibrium pressure was shown to be below 6.5%, which ensures the equilibrium pressure stress calculations are within the validity limits of the benchmark calculation.

Calculation # 4 – Evaluation of Penetration Areas for Thermal Overpressurization

This calculation was performed to show that the pressure in the isolated piping when combined with other concurrent loads meets the requirements of the ASME B&PV Code Section III for Level D (i.e., faulted) conditions. The calculation was based on the accepted stress criteria in Appendix F, rather than the strain criteria. The evaluation encompasses the piping itself, the fittings, including the isolation valves, and the penetrations.

An inelastic system analysis was used because the pipe is allowed to yield to determine the final equilibrium pressure between the pipe and the water. The method used to determine the increase in pressure with temperature in the pipe is based on equating the pressure in the piping system, at a particular temperature, to the pressure needed to maintain the water in thermodynamic equilibrium. First, an equation was derived that provided the volumetric expansion of a piping system under pressure and temperature. This derivation was based on a simple cylinder, capped at both ends. The length of the cylinder was based on the total length of the isolated volume. However, the length, which will plastically deform was taken as less than the total length of the isolated volume because "thinner" materials will yield first. Therefore, the uniform volume increase under pressure was modified to account for the stiffer regions of

piping (i.e., the valve bodies and the penetration head fitting). The next step was to calculate the volumetric expansion of the isolated volume of water. From the initial pressure and temperature of the fluid, shown in the Calculation # 1 discussion, the initial specific volume was determined using the ASME Steam Tables. The Maximum Volumetrically Averaged Temperature, from the thermal transient analysis in Calculation #1, was used to iterate on the final pressure so that the change in specific volume, divided by the initial specific volume of the fluid, was equal to the change in the volume of the expanding pipe divided by its initial volume. This equilibrium point was calculated as the final internal pressure within the isolated volume. Once the final equilibrium pressure was determined, the appropriate piping equations were checked to ensure the piping was acceptable. The pipe fittings, valves and penetration head fitting were also accepted by comparison to the piping or available qualification data.

The acceptance criteria for the piping, shown below, were taken from the ASME B&PV Code, Section III, Paragraph F-1360(a) for pressure and Paragraph NC-3611.2(C)(4) for axial stresses:

- 1. The allowable pressure shall not exceed 2.0 times the pressure calculated in accordance with Equation 2 of NB-3641.1.
- 2. The conditions of Equation 9 of NC-3652.2 shall be satisfied using a stress limit of 2.4Sh.

For piping and components, which did not meet the alternative simplified pressure criterion above, the results from the previously mentioned system inelastic analysis were used to verify the following criteria.

- 1. For pressure design, the primary stress limits of NB-3221 are satisfied using an S_m value equal to the higher of 0.70 S_u and $[S_y + (S_u S_y) / 3]$ at temperature.
- 2. The conditions of Equation 9 of NC-3652.2 shall be satisfied using a stress limit of 2.4Sh.

For piping, the pressure loads were combined with deadweight loads. The only other piping load during a LOCA or MSLB is thermal expansion, a self-limiting load. Paragraph NC-3650 clearly shows that thermal expansion is considered separately from other stresses. This is also consistent with the use of Appendix F, Paragraph F-1310(c), which states that only primary loads are considered.

Since the valves are part of the piping, they were evaluated using the same load combination as the piping (i.e., pressure + deadweight). Calculations were performed to check the most critical components within the valve body and to ensure that these weak link components can withstand the pressure due to the fluid thermal expansion. For the Air Operated Valves (AOVs) on Penetration P-71, the lifting pressure was calculated to show that these AOVs would lift before they reach the system equilibrium pressure. These P-71 lines were then evaluated using this lift pressure.

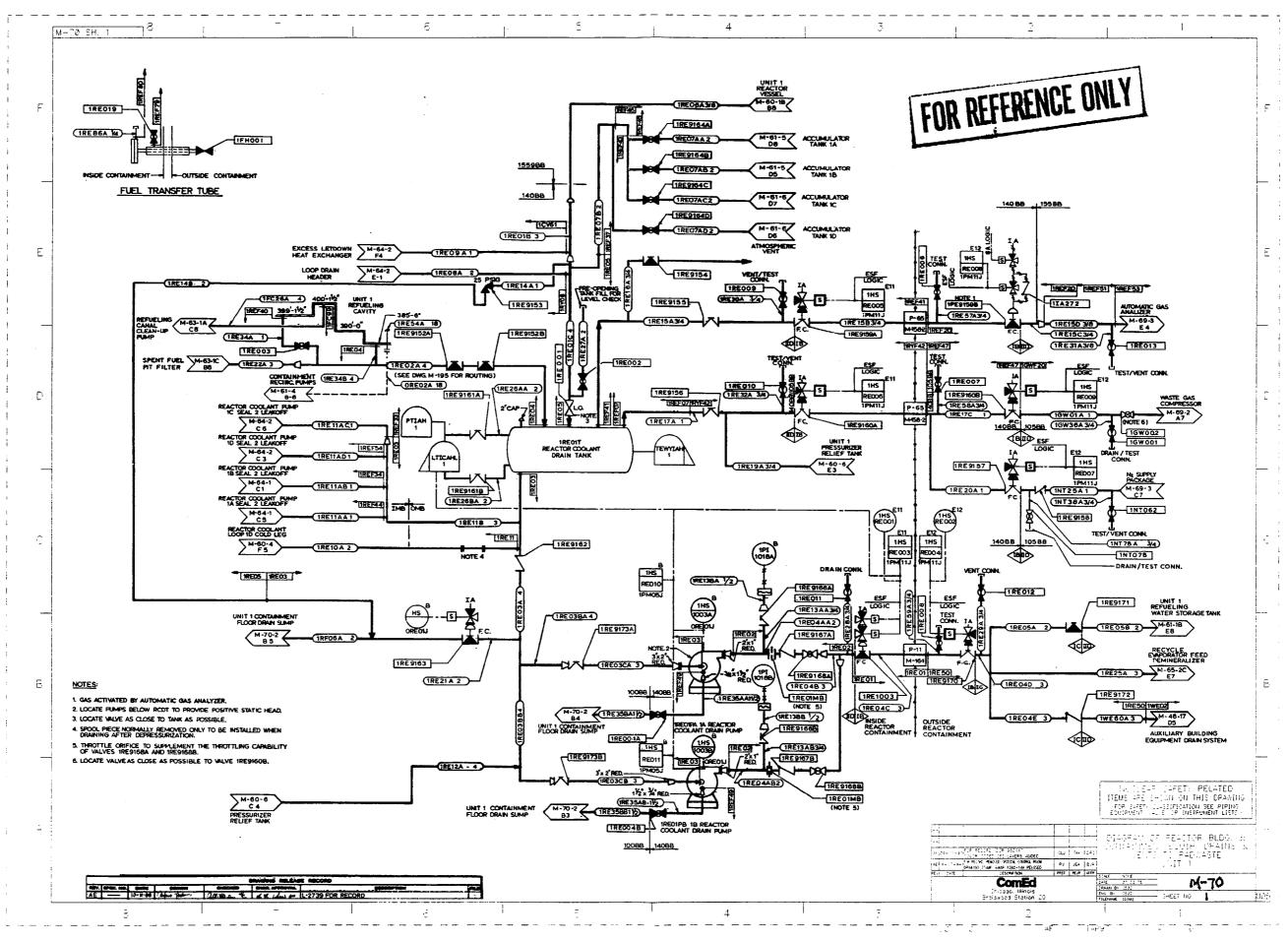
For the penetrations, the pressure load is combined with SSE loads. Thus, the load combination considered for the penetrations is: Pressure + Weight + SSE. The resulting stresses from the new loads were calculated and found to be less than the faulted condition allowable stress.

For penetrations P-37, P-55, P-70 and P-71, the results of the evaluations are summarized as follows.

- 1. Pipe stress due to the predicted overpressure was shown to be less than Service Level D limits provided in Appendix F, Paragraphs F-1360(a), F-1324.6, and Table 1322.2-1.
- 2. Pipe stress due to the predicted overpressure plus weight was shown to be less than Service Level D limits (2.4S_h) provided in the ASME Code, Section III, Subsection NC.
- 3. Pipe fittings were shown to be acceptable by comparison to piping with comparable thicknesses.
- 4. Valve components were shown to be able to withstand the predicted overpressure.
- 5. The penetration stress intensity, including the effect of process pipe overpressure, was shown to be within allowable limits.

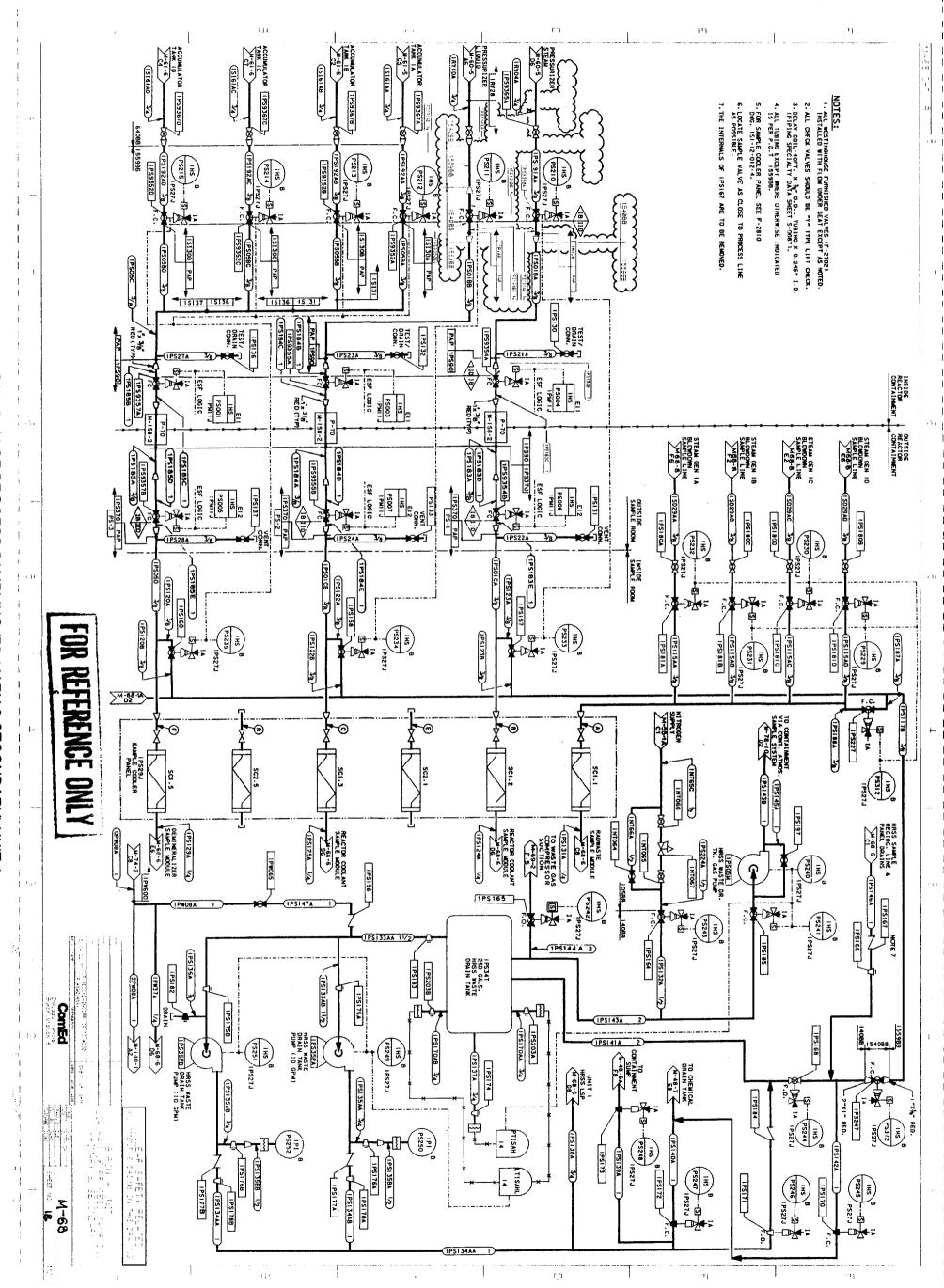
Based on these results, it is concluded that the overpressure condition described in NRC GL 96-06 has been evaluated and piping systems associated with penetrations P-37, P-55, P-70 and P-71 for Byron and Braidwood Units 1 and 2 meet Appendix F acceptance criteria for the Level D condition.

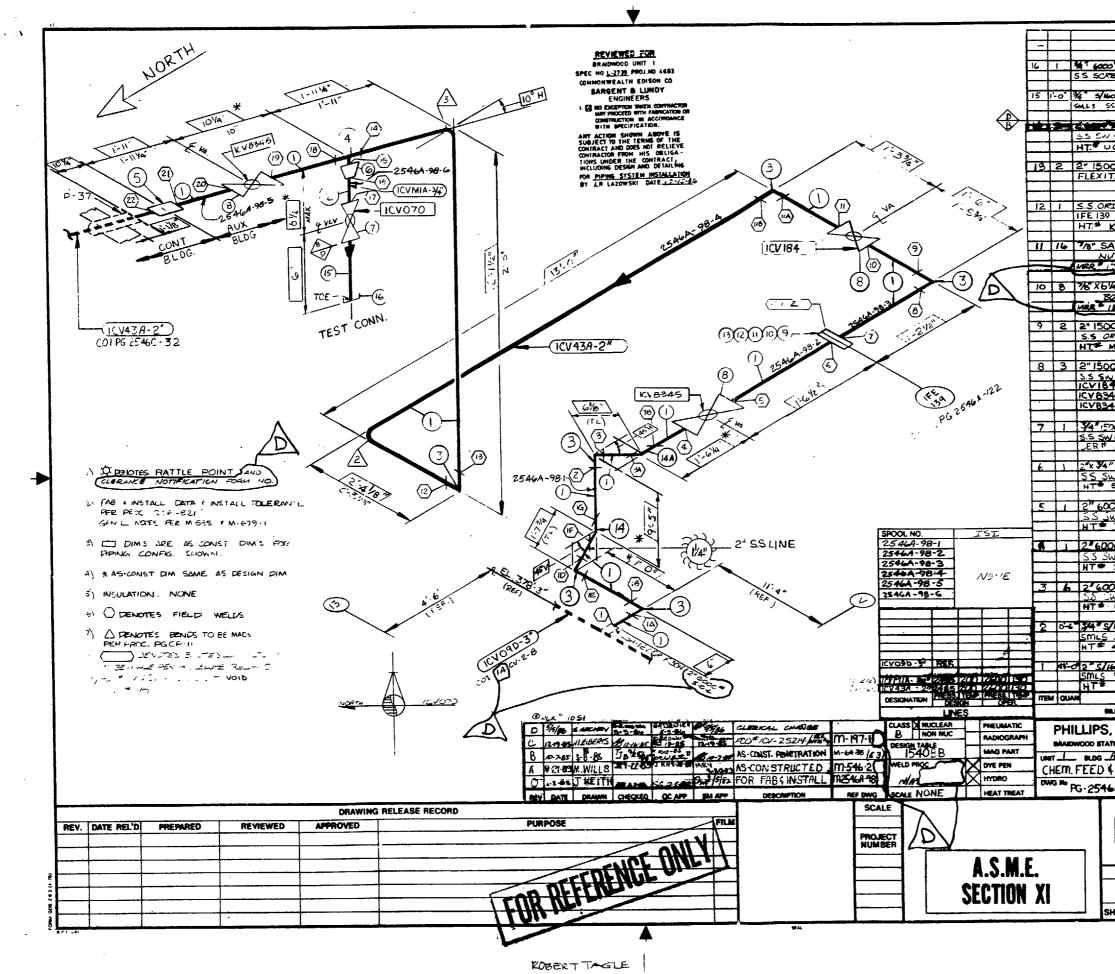
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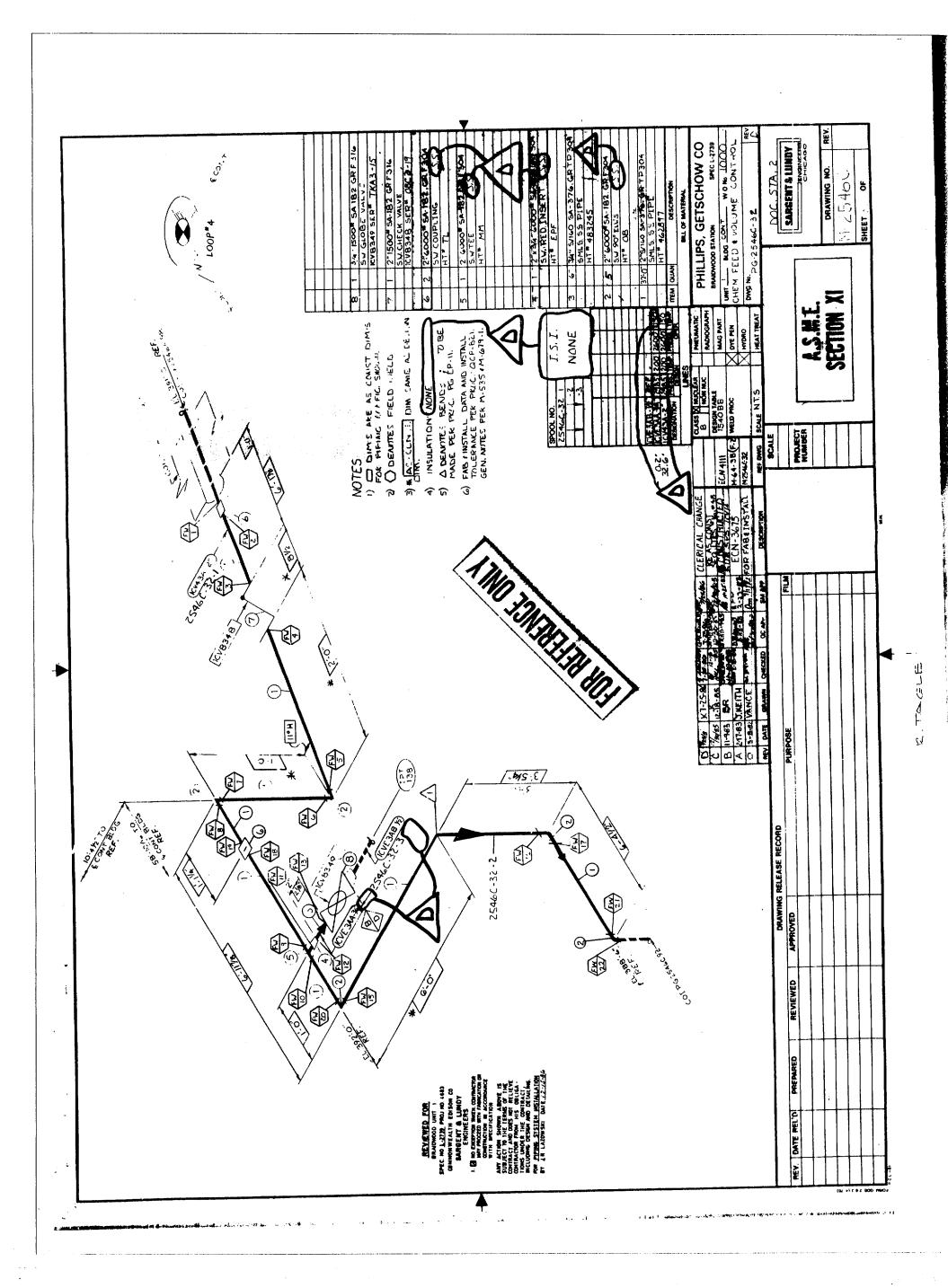


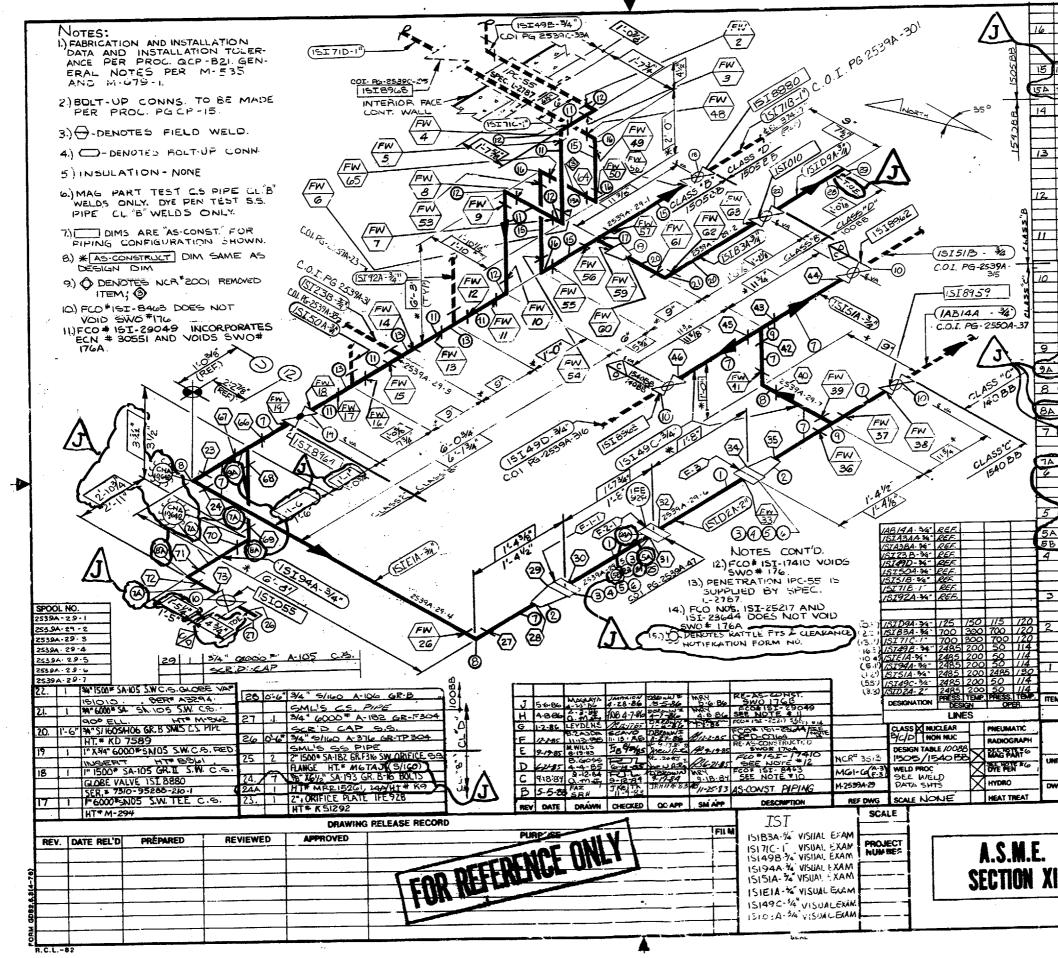


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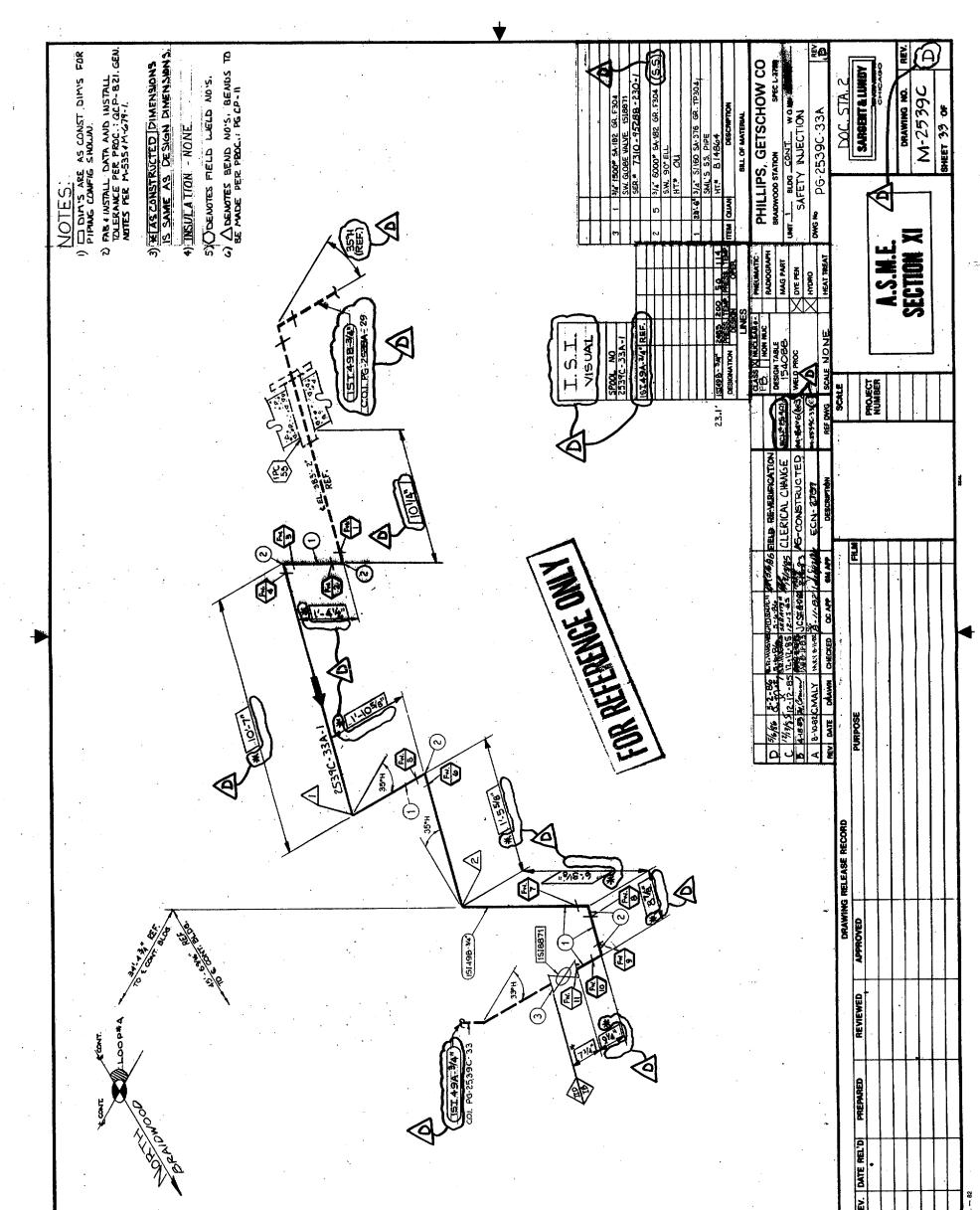
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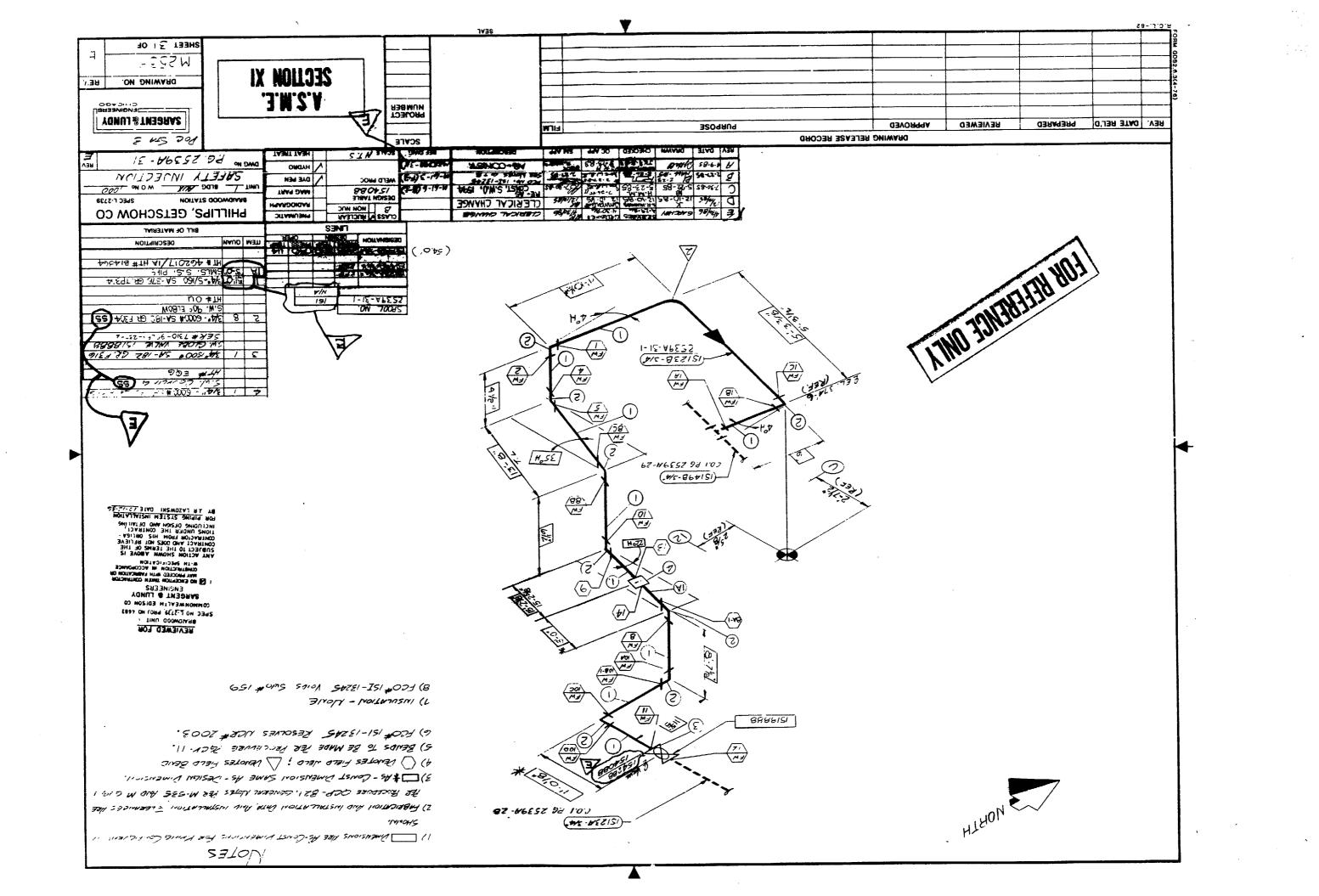
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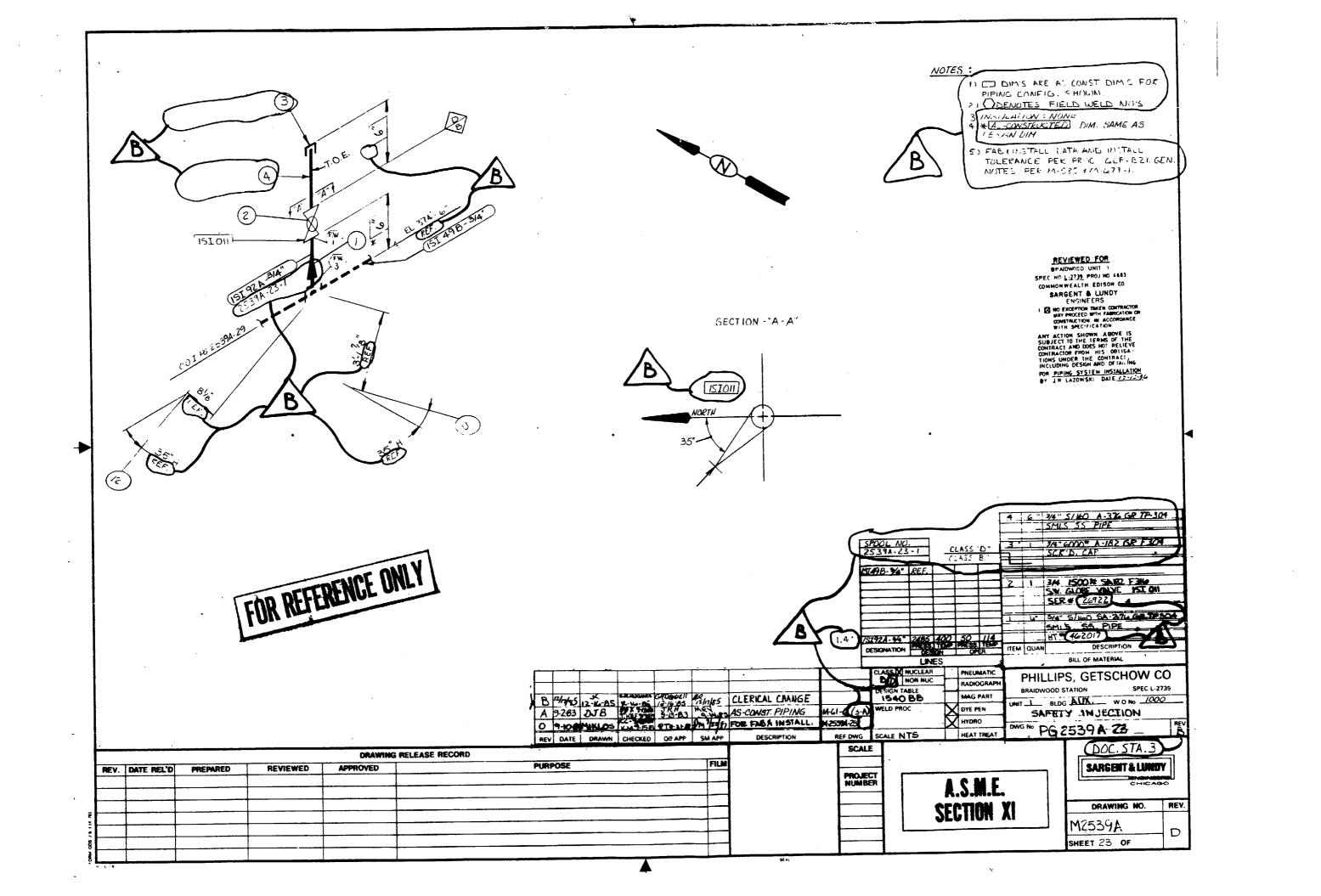


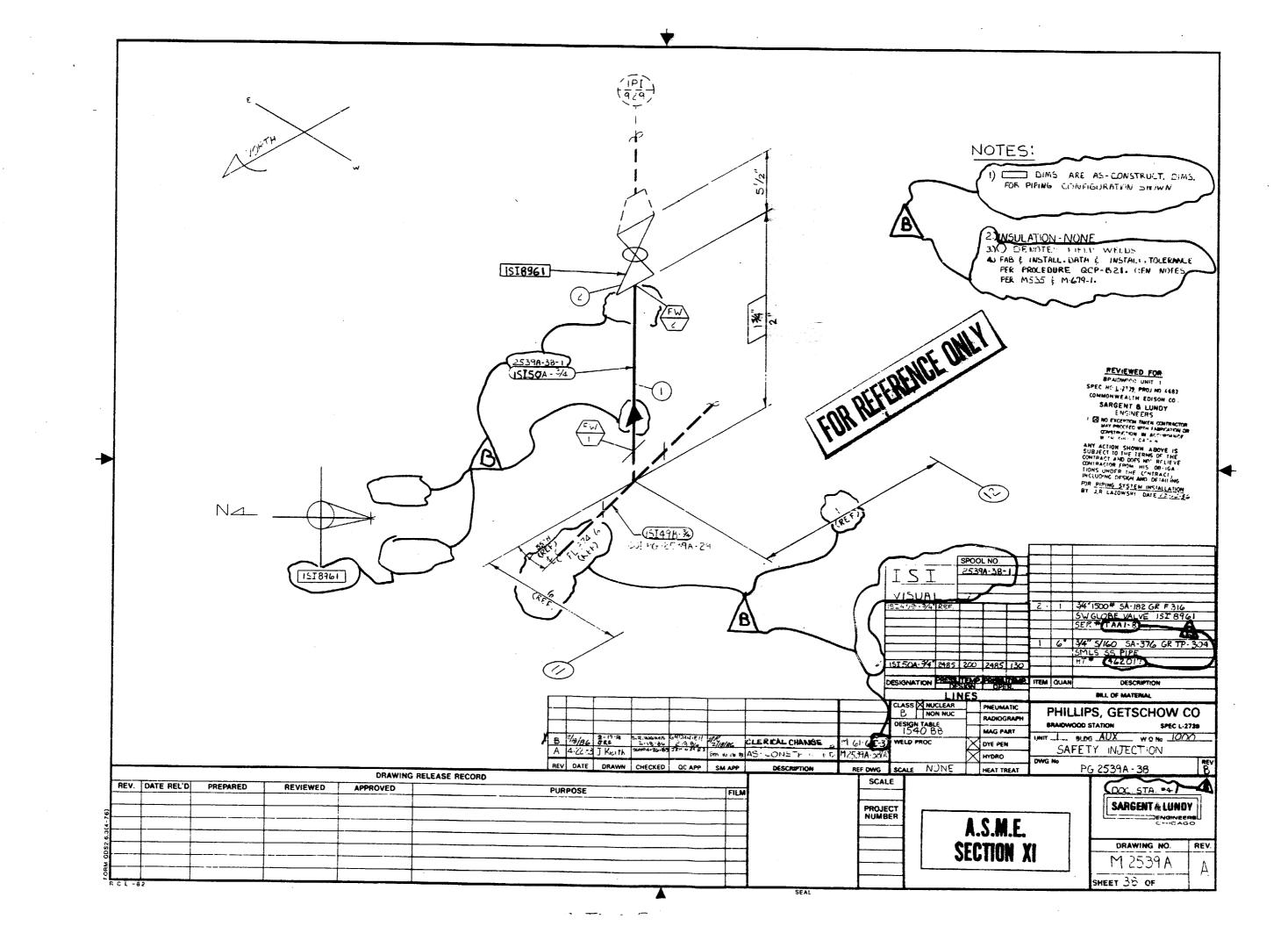


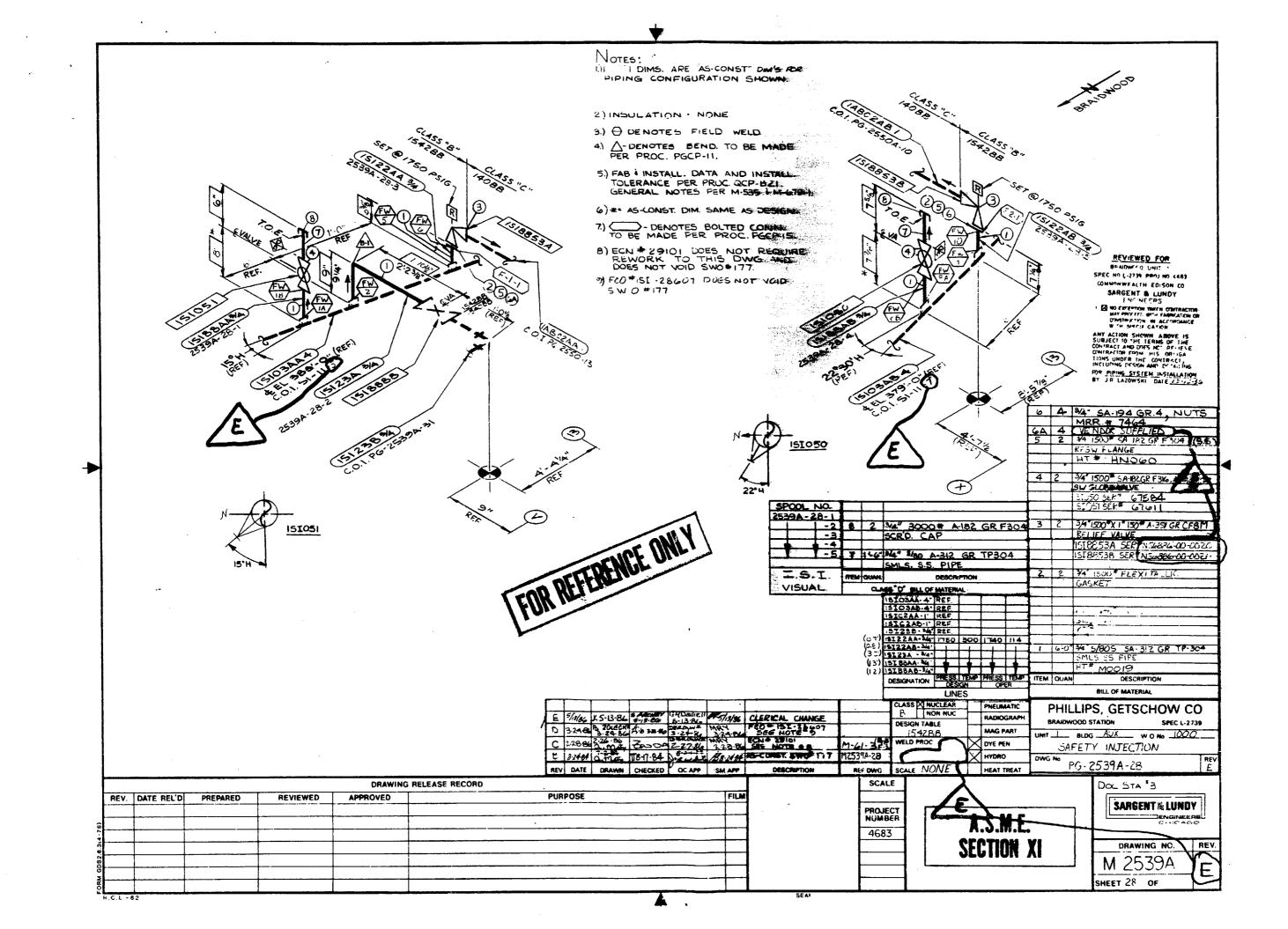
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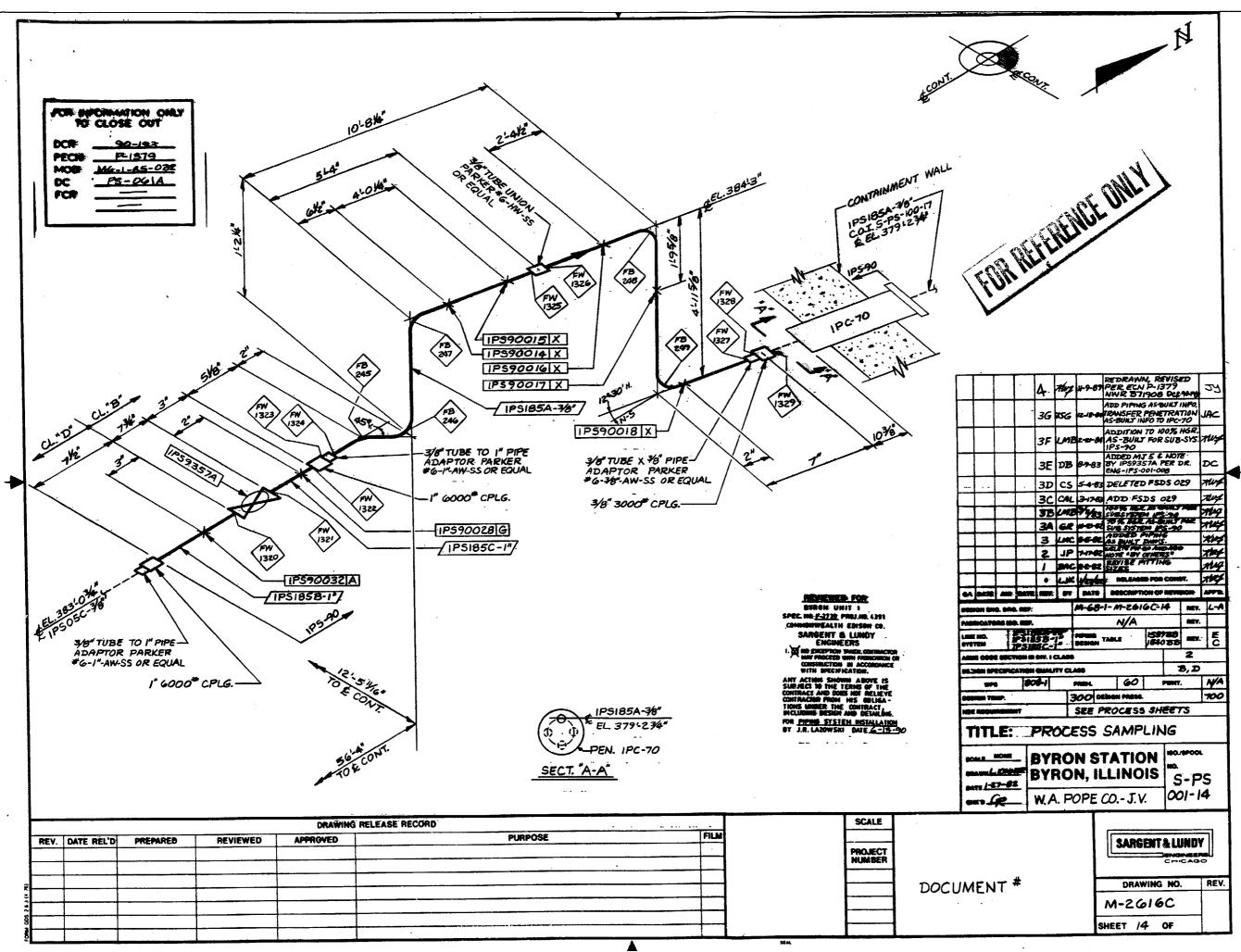


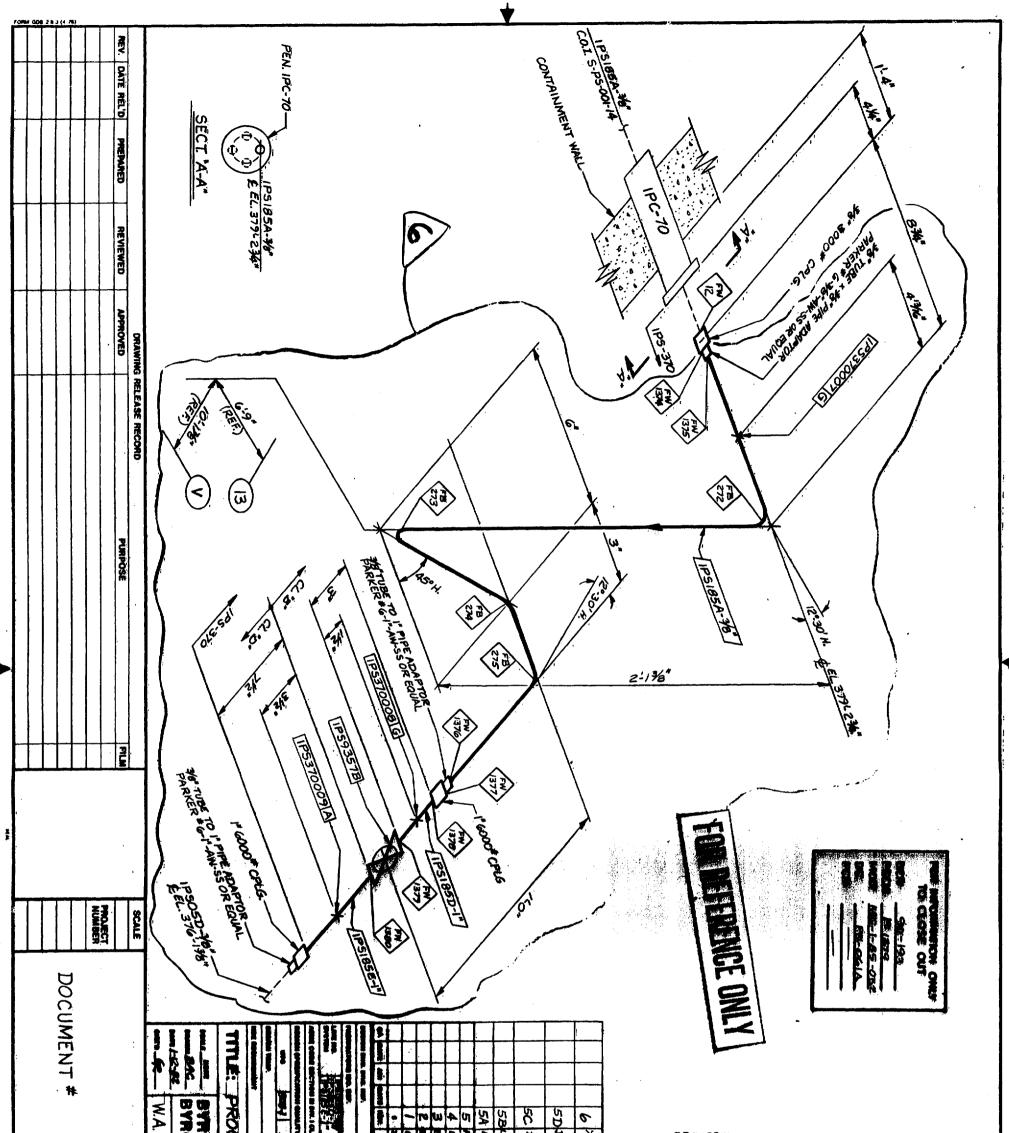












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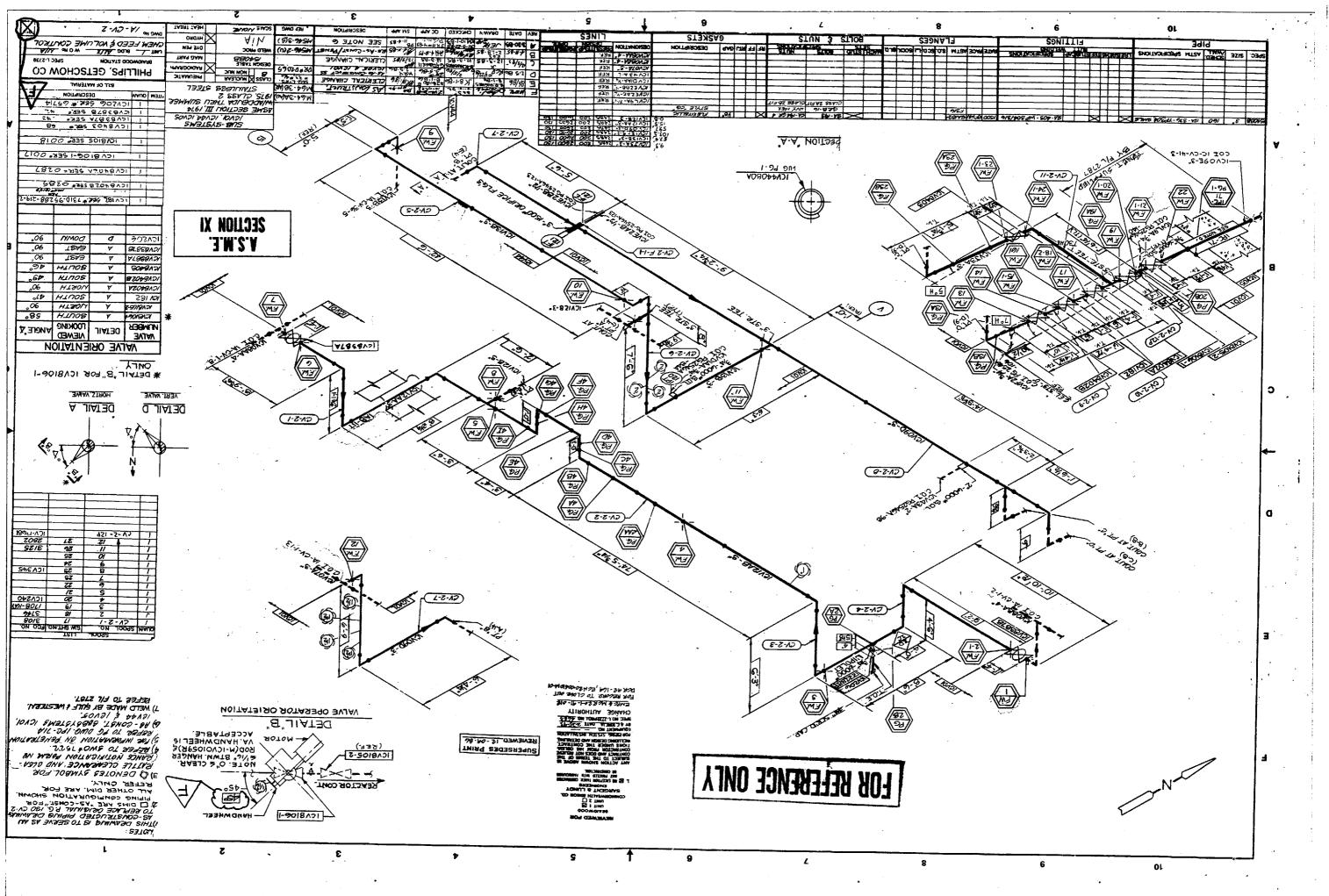
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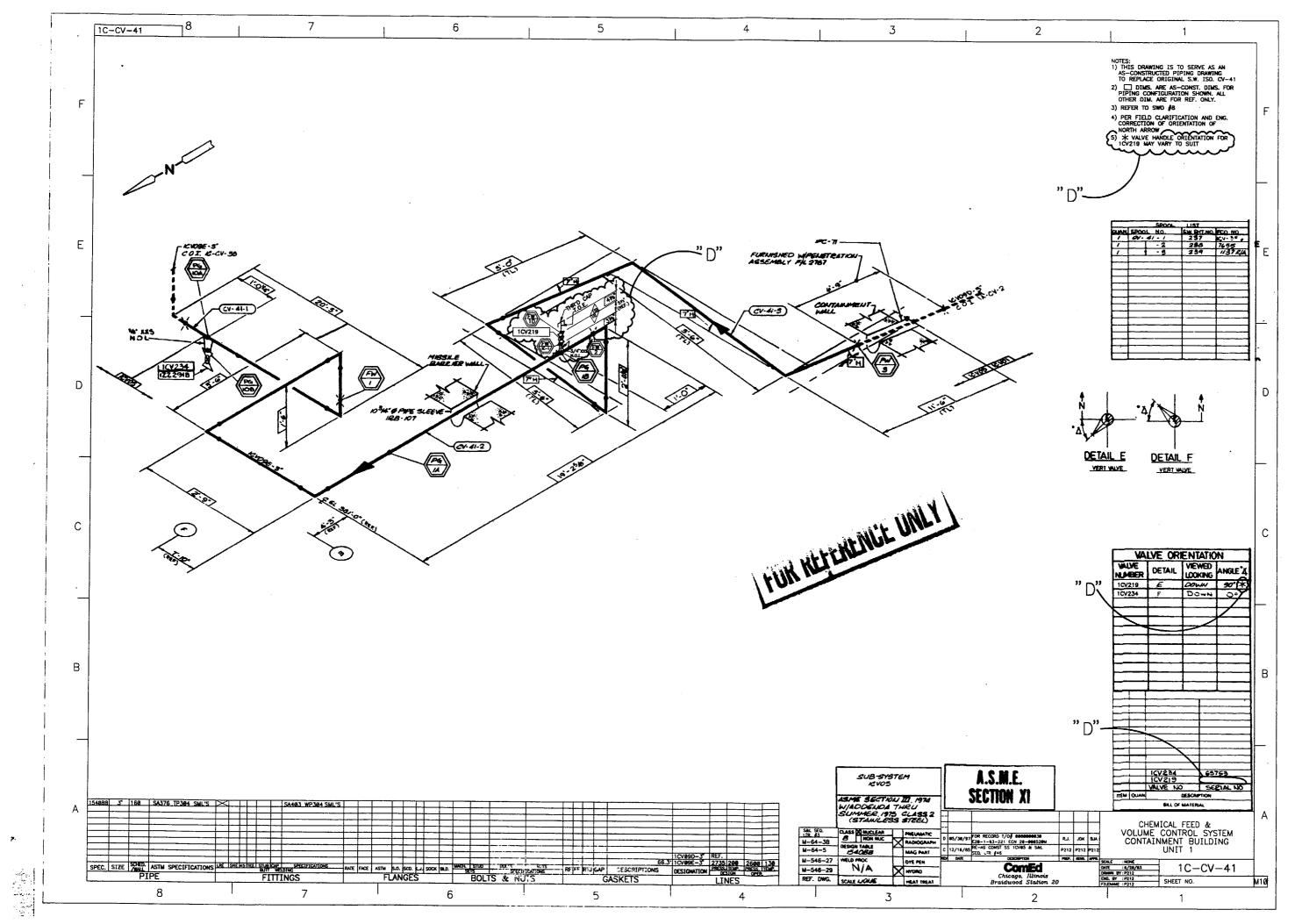
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