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UNITED STATES NUCLEAR REGULATORY COMMISSION'S ADVISORY COMMITTEE ON REACTOR SAFEGUARDS

February 8, 2008

The contents of this transcript of the proceeding of the United States Nuclear Regulatory Commission Advisory Committee on Reactor Safeguards, taken on February 8, 2008, as reported herein, is a record of the discussions recorded at the meeting held on the above date.

This transcript has not been reviewed, corrected and edited and it may contain inaccuracies.

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1	UNITED STATES OF AMERICA
2	NUCLEAR REGULATORY COMMISSION
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4	549TH MEETING
5	ADVISORY COMMITTEE ON REACTOR SAFEGUARD
6	(ACRS)
7	+ + + +
8	FRIDAY
9	FEBRUARY 8, 2008
10	+ + + +
11	ROCKVILLE, MARYLAND
12	+ + + +
13	The Advisory Committee met at the Nuclear
14	Regulatory Commission, Two White Flint North, Room
15	T2B3, 11545 Rockville Pike, at 8:30 a.m., Dr. William
16	J. Shack, Chairman, presiding.
17	COMMITTEE MEMBERS:
18	WILLIAM J. SHACK, Chairman
19	MARIO V. BONACA, Vice Chairman
20	GEORGE E. APOSTOLAKIS, Member
21	DENNIS C. BLEY, Member
22	DANA A. POWERS, Member
23	JOHN W. STETKAR, Member
24	MICHAEL CORRADINI, Member
25	JOHN D. SIEBER, Member
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1	COMMITTEE MEMBERS: (CONT.)
2	OTTO L. MAYNARD, Member
3	SAID ABDEL-KHALIK, Member at Large
4	J. SAM ARMIJO, Member
5	SANJOY BANERJEE, Member
6	TANNY SANTOS Jr., Designated Federal Official
7	
8	STAFF PRESENT:
9	SAM DURAISWAMY
10	ZENA ABDULLAHI
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1	AGENDA
2	OPENING REMARKS BY THE ACRS CHAIRMAN 3
3	PROPOSED BWR OWNERS GROUP TOPICAL REPORT
4	ON METHODOLOGY FOR CALCULATING AVAILABLE
5	NET POSITIVE SUCTION HEAD FOR ECCS PUMPS 5
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1	PROCEEDINGS
2	(8:30:27 a.m.)
3	CHAIRMAN SHACK: The meeting will now come
4	to order. This is the second day of the 549 th Meeting
5	of the Advisory Committee on Reactor Safeguards.
6	During today's meeting, the Committee will consider
7	the following: Proposed BWR Owner's Group Topical
8	Report on Methodology for Calculating Available Net
9	Positive Suction Head for ECCS Pumps; future ACRS
10	activities and report of the Planning and Procedures
11	Subcommittee; reconciliation of ACRS comments and
12	recommendations; Subcommittee report regarding draft
13	NUREG 1855, Guidance on the Treatment of Uncertainties
14	associates with PRAs and risk-informed decision
15	making; a draft ACRS report on the NRC Safety Research
16	Program, and the preparation of ACRS reports.
17	The portion of the session related to the
18	BWR Owner's Group Topical Report will be closed to
19	discuss and protect information that is proprietary to
20	the Owner's Group and their contractors.
21	This meeting is being conducted in accord
22	with the provisions of the Federal Advisory Committee
23	Act. Mr. Tanny Santos is the Designated Federal
24	Official for the initial portion of the meeting.
25	We have received no written comments or
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requests for time to make oral statements from members of the public regarding today's session. A transcript of a portion of the meeting is being kept, and it is requested that the speakers use one of the microphones, identify themselves, and speak with sufficient clarity and volume so they can be readily heard.

I'd also remind the members that we're scheduled to interview a potential candidate during lunch time today, so don't run too far.

You have another CD that was laid down near you with slides from the NGNP Subcommittee meeting for those members who weren't able to attend. You also have a letter that we wrote back in 1988 on gas cooled reactors, just in case we want to be consistent.

17MEMBER STETKAR: I can get you more18history if you want.

And I would like to CHAIRMAN SHACK: 19 welcome a new ACRS staff member, Christina Antonescu 20 is on a rotational assignment to the ACRS staff. 21 She 22 professional engineering 22 years of has over 23 experience in nuclear power. She has been a Project 24 Manager in the Office of Nuclear Regulatory Research 25 She has been working in the for 17 years.

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1	Instrumentation and Controls area for over 15 years,
2	and has investigative research experience involving
3	digital INC technology and advanced reactor designs,
4	including advanced light water reactors, such as ABWR,
5	AP 600, and System 80 Plus.
6	Christina has a Bachelor of Science degree
7	in Electrical Engineering, and a Master of Science
8	degree in Telecommunications Management from the
9	University of Maryland. Welcome aboard.
10	(Applause.)
11	MEMBER APOSTOLAKIS: You can speak now.
12	CHAIRMAN SHACK: Our first topic today is
13	the BWR Owner's Group Topical Report on Net Positive
14	Suction Head, and Said will be leading us through
15	that.
16	MEMBER ABDEL-KHALIK: Thank you, Mr.
17	Chairman.
18	Credit for containment over-pressure and
19	calculating the available net positive suction head
20	for ECCS pumps during an accident is, and has been, an
21	issue of concern. To address some of the concerns
22	raised by the ACRS with regard to this issue, the BWR
23	Owner's Group formed a committee to develop guidance
24	for NRC approval of such credit, and a method for
25	quantifying the uncertainties in NPSH calculations.
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Today we will be briefed on these activities. A Licensing Topical Report describing the methodology will be submitted in the near future. And, hopefully, we will have an opportunity to review that document.

Today's presentation will begin with the Staff's brief presentation, and that will be given by Mr. Lobel.

8 MR. LOBEL: Good morning. My name is 9 Richard Lobel. I'm a Senior Reactor Systems Engineer 10 in the Office of Nuclear Reactor Regulation. At today's meeting, the BWR Owner's Group, as you just 11 heard, will present to the Committee a description of 12 a statistical method to determine the available net 13 positive suction head of BWR ECCS pumps. 14

15 The purpose of the method is to both 16 reduce and quantify the conservatism in these calculations. We believe that at least in some cases 17 that the need for crediting containment over-pressure 18 19 is due to the conservatism of the calculations, and 20 not the physical design of the plant itself. The emphasis in these cases is on crediting containment 21 22 accident pressure in determining available net 23 positive suction head, NPSH.

The NRC staff had proposed this approach as an option in a proposed revision to Reg Guide 1.82,

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which was previously presented to the Committee. 1 The BWR Owner's Group used its technical expertise to 2 convert this concept into a method described in the 3 4 topical report that they plan to submit to the staff 5 for review. 6 The BWR Owner's Group and the staff met in 7 October of 2007 to discuss the method, and ACRS staff were present. Before the BWR Owner's Group makes its 8 9 presentation, I thought it would be helpful to the Committee to introduce the subject by giving a very 10 brief background on the history of the subject, the 11 12 use of containment accident pressure in determining 13 net positive suction head, and the regulatory guidance on the subject. 14 I'd like to start on page 4 of the slides. 15 16 CHAIRMAN SHACK: Just, Rich, let me ask; did the Rev. 4 ever become official? 17 MR. LOBEL: No. 18 19 CHAIRMAN SHACK: No. 20 MR. LOBEL: We never got passed ACRS. SHACK: 525th 21 CHAIRMAN That was the 22 Meeting. 23 (Laughter.) 24 We have plans to revise it. MR. LOBEL: 25 the There -- we're taking into account are **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	recommendations of the Committee, informal
2	recommendations of the Committee. As you were told at
3	a previous meeting, we're planning to risk-inform the
4	Reg Guide. We'll make the wording clearer, add more
5	detail on determining NPSH, and maybe, depending on
6	resources.
7	MS. BROWN: They asked me to sit next to
8	you, and change your slides for you.
9	MR. LOBEL: Oh, thank you. If resources
10	permit, do some other things, editorial nature to just
11	make the guide easier to use.
12	Also, not part of my work, but there is
13	some work going on in research to revise the same Reg
14	Guide for GSI 191 issues. And whether those things
15	will all get done at the same time, I'm not sure, but
16	let me get back to the subject.
17	PARTICIPANT: Three will work.
18	MR. LOBEL: Three, yes.
19	MEMBER APOSTOLAKIS: Our 4 is your 3.
20	MR. LOBEL: Okay. Let me just use this
21	little figure to illustrate what I'm talking about.
22	I'm sure everybody has a basic idea, or even more, but
23	just so everybody's on the same page with what I'm
24	discussing.
25	Imagine a pump taking suction from a tank.
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The available NPSH is determined by a simple formula 1 2 that the pressure forcing the fluid into the pump minus the vapor pressure is, roughly speaking, what 3 net positive suction is. And that's determined by a 4 5 positive term for the atmosphere above the liquid surface, the static height of the liquid minus the 6 7 loss flow loses of the liquid flowing from the tank to the pump, and it's done in terms of being above the 8 9 vapor pressure, so there's a minus head for the vapor 10 If this tank is open to the atmosphere, pressure. 11 then H atmosphere is just a head of atmospheric 12 pressure. If the tank is closed, H atmosphere can be 13 above or below atmospheric pressure. 14 Imagine now this tank is the TOROS of a 15 BWR with a suppression pool that fills a large part of 16 the volume, and then gas above the surface of the 17 water. One way of doing the NPSH calculation is just 18 to assume that the pressure is atmospheric pressure. 19 And if that doesn't give enough -- sufficient 20 available NPSH, then credit is taken in some cases for 21 the atmospheric pressure above the liquid being the 22 accident pressure for whatever accident we're talking 23 about. 24 MEMBER CORRADINI: And, if I just -- and

25 when you do give this credit, then that becomes

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1	dynamic; that is, it changes with time.
2	MR. LOBEL: Right.
3	MEMBER CORRADINI: Okay.
4	MR. LOBEL: Right. Because the conditions
5	change with time, the temperature of the suppression
6	pool and the accident pressure change with time, and
7	maybe even the flow rates change with time. Okay?
8	Oh, I'm sorry. Do your job for you.
9	(Laughter.)
10	MR. LOBEL: It's hard to un-train me once
11	I get started.
12	Okay. Some early reactors were licensed
13	with crediting containment and accident pressure for
14	NPSH. In 1970, the NRC issued a Regulatory Guide,
15	which stated that no credit for increase in
16	containment accident pressure should be credited for
17	calculating NPSH.
18	In 1974, the staff issued a Regulatory
19	Guide, 1.82, Revision 0, that talked about pump
20	suction issues. And one of the criteria was that the
21	blockage of the sump screen or the ECCS strainer in a
22	BWR should be assumed to be blocked by 50 percent of
23	its area. And that was the first official guidance in
24	the area of sump blockage, or strainer blockage.
25	In the late 1970s, an unresolved safety
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issue, USI A-43 was started, and in 1985 it was completed and a generic letter, and some NUREG reports were issued, and Regulatory Guide 1.82 was revised to Revision 1. And the results of this work were studies in debris blockage, air entrainment, sump design, and NPSH, but there was no change to the guidance of Reg Guide 1.1, as a result of this early work.

8 Next slide. In 1992, there was an event 9 at a Swedish reactor where a strainer was blocked by 10 debris, and this started a new look at the issue of In 1996, this 11 blockage of strainers for BWRs. resulted in issuing a Bulletin 96-03, and another 12 revision to Reg Guide 1.82, Revision 2 to the Reg 13 Guide. This resulted in BWRs installing large paths 14 15 of strainers to accommodate the change in assumptions 16 from the 50 percent blockage criterion, to something more physically real. And it was based on the fact 17 that not only was there this event in Sweden, but 18 there were some events in the United States where 19 20 strainers were actually clogged at BWRs.

About the same time, the staff became aware of some events at reactors that put into question the net positive suction head determinations at operating plants, and the staff issued a Generic Letter, 97-04, in 1997 that requested information on

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how licensees were calculating net positive suction 1 2 And as a result of this, licensees went back head. and looked at their analyses and their determination, 3 4 some found that they had errors in the and 5 some found that things they were calculations, 6 crediting weren't guite correct, some licensees 7 couldn't find their analyses and did a reconstitution, 8 and came up with new analyses. And a result of both the Bulletin 96-03, and the Generic Letter, some 9 10 licensees found that when they put in the larger strainers, or when they went back and did their net 11 positive suction head calculations, they didn't have 12 13 adequate available NPSH, unless they credited 14 containment accident pressure. 15 The staff reviewed the responses to the

Generic Letter, and wrote letters back to licensees, and in cases where containment accident pressure was credited, especially, the reviews were pretty detailed, and got into a lot of the details of the calculations.

In 2001, about that time, the staff went to look at the PWRs, pressurized water reactors, as part of GSI-191, and issued another revision to Reg Guide 1.82, which became Revision 3. In this Reg Guide, although it wasn't really the focus of the Reg

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1 Guide, the focus was the GSI-191 issues, the staff put 2 in some guidance on NPSH. That was the first time that NPSH guidance had been put into the Reg Guide. 3 4 And the purpose of that was to document the criteria 5 that the staff had used in reviewing the Generic 6 97-04 responses, because it wasn't all Letter 7 documented in any one place. You could find 8 individual criteria in individual SERs, or letters 9 that the staff wrote, but it wasn't all together. So 10 the idea of putting it in Reg Guide 1.82 was to consolidate all the pump suction guidance into one Reg 11 Guide, and that's the situation now. 12

13 The NPSH guidance, along with the other changes were presented to ACRS, but, like I said, I 14 15 think the GSI-191 work really got the emphasis, and I don't know how much review, I don't think a whole lot 16 17 of review was put on the NPSH guidance at that time. Essentially, the guidance for NPSH, and 18 19 this has been much criticized, and this is one of the 20 things that we'll revise, but the guidance was that no

21 credit should be taken for containment accident 22 pressure, but it recognized a real situation, that in 23 some cases it would be acceptable for operating 24 reactors to credit containment accident pressure when 25 there was no practicable alternative.

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1 The staff position has been that credit 2 for containment accident pressure would be allowed 3 when the analyses, conservative analyses demonstrated 4 that sufficient pressure was available for the design-5 basis accidents, and for beyond design-basis accidents 6 an acceptable level of safety is maintained, and that 7 means looking at this from a risk point of view, and 8 looking at some of the events that are called special 9 events, like Appendix R, station blackout, and ATWS, 10 that aren't design-basis events, but that licensees 11 analyze. So can I make sure --12 MEMBER CORRADINI: 13 can you restate one a different way, so I understand what one means. I think I understand two based on 14 15 what you just said. 16 If there's MR. LOBEL: no practical alternative, you can credit containment accident 17 18 pressure if you determine the containment pressure 19 available in a conservative way; which means you 20 minimize the available pressure. 21 analyses, For some containment you 22 maximize the pressure, like for peak pressure 23 calculations to see if the containment is designed properly. In this case, you bias the calculation in 24 25 the other direction, and you try to minimize in a NEAL R. GROSS

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conservative way the pressure that's available. 1 Then 2 you determine the pressure that you need, and the 3 pressure that you need has to be below that conservatively calculated pressure that's available. 4 5 MEMBER STETKAR: Does that process of 6 conservatively minimizing the pressure account for the 7 fact that the operators are trained to do everything 8 possible to keep pressure as low as practical, as low 9 as possible? MR. LOBEL: 10 Yes. Manually initiating 11 MEMBER STETKAR: sprays, vents, whatever they have available? 12 13 MR. LOBEL: The calculations are done for BWRs, assuming that the sprays are on for the whole 14 time that the transient. After 10 minutes, there's a 15 16 10-minute window at the beginning of the accident 17 where no operator action is allowed. The assumption 18 is that --MEMBER STETKAR: Well, in the real world, 19 20 operators do things in 10 minutes, though. In the real world, 21 LOBEL: MR. yes. 22 Actually, I've discussed this with some operators, and 23 in the real world, they would probably take action before the 10 minutes. 24 25 MEMBER STETKAR: Oh, absolutely. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	MR. LOBEL: But the analysis assumes that
2	the operator takes no action for 10 minutes. And then
3	the operator starts the sprays, and the sprays stay on
4	for the rest of the accident, so that's one
5	assumption.
6	MEMBER BLEY: It's conservative when
7	you're doing other kinds of calculations, you leave
8	the operator out of the picture. But here
9	MEMBER STETKAR: If they started in 30
10	seconds
11	MEMBER BLEY: unless they start
12	automatically, which I heard some
13	MEMBER STETKAR: Sometimes they do, but if
14	the operator starts it at T=30 seconds, assuming they
15	wait for 10 minutes, is optimistic, isn't it?
16	MR. LOBEL: Well, the sooner the operator
17	starts, the sooner he starts cooling the suppression
18	pool. And it's the suppression pool temperature
19	that's the key variable in all this.
20	MEMBER CORRADINI: So I guess I wanted to
21	get back to that. Can you go back two slides, or
22	whatever it is, the simple cartoon. So in the simple
23	cartoon, HVP is a function of the water temperature.
24	MR. LOBEL: Right.
25	MEMBER CORRADINI: So when you say
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1	"minimize", you also then are looking for the highest
2	vapor pressure.
3	MR. LOBEL: Right.
4	MEMBER CORRADINI: Okay. You're not
5	inconsistently
6	MR. LOBEL: The calculations are done to
7	maximize the suppression pool temperature, and
8	minimize the containment pressure.
9	MEMBER CORRADINI: Okay. Thank you.
10	Because the operators have different guidance
11	regarding drywell pressure and suppression pool
12	temperature. They're not trained to start suppression
13	pool cooling until temperature in the suppression pool
14	reaches which is a delay.
15	MR. LOBEL: Well, it turns out that
16	crediting this really doesn't change the emergency
17	operating procedures at all. The operator already has
18	guidance, the EOPs already have guidance for the
19	operator to make sure that he has adequate NPSH.
20	There are some curves in the emergency operating
21	procedures in terms of flow and temperature,
22	suppression pool temperature and accident pressure to
23	guide the operator, and those don't change. There
24	could be a note put in to tell the operator that he
25	needs to maintain the pressure at a higher value to
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make sure that he doesn't lower the pressure below the pressure that's credited.

MEMBER STETKAR: Well, having been an operator, and gone through exercises of when to trip reactor coolant pumps on pressurized water reactors, and when not to trip reactor - that type of guidance about keep pressure high under these conditions, and keep pressure low under other conditions can be a little difficult for operators to really follow.

10 My question was more not organized toward 11 the emergency operating procedures, as to what 12 conditions the staff will accept in the confirmatory 13 analyses for the NPSH calculations.

The calculations have been 14 MR. LOBEL: 15 done in a very conservative way that, like I say, 16 maximizes the suppression pool temperature, which is the key variable, and minimizes the pressure, so the 17 18 sprays are on, but there are other assumptions that 19 assure that the suppression pool temperature is at its 20 maximum. You assume a maximum power decay heat, the 21 level of the suppression pool is assumed to be at a 22 minimum value, the pump flows that contribute to NPSH, 23 the loss are assumed to be higher than expected, that kind of thing. 24

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VICE CHAIR BONACA: I would like to say

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1	one thing. I think we need to keep in mind that, for
2	example, in the Brown's Ferry analysis of the Appendix
3	R scenario, the containment cooling is switched off to
4	maximize pressure in containment, so there are
5	instances already we should keep in mind, that may be,
6	in fact, counterintuitive for the operator.
7	MR. LOBEL: The drywell coolers are
8	switched off. The suppression pool is still cooled.
9	Could I suggest, this is taking longer than I
10	expected. I'd be glad to come back and run through
11	this with the Committee any time the Committee would
12	like, but I'd like to give as much time as possible to
13	the Owner's Group.
14	CHAIRMAN SHACK: Thank you. Proceed.
15	MR. LOBEL: So let me just finish up.
16	At present, there's 18 BWRs crediting
17	containment accident pressure to some degree, and 10
18	PWRs, and that includes 5 sub-atmospheric containment
19	PWRs that require it really as part of their design
20	since they're at a low pressure, and the pumps start
21	earlier, and that kind of thing.
22	The other point I wanted to make is that
23	this gets treated, this issue gets treated a lot like
24	it's something unique, and it's not really that
25	unique. 10 CFR 50.46, which is the ECCS Rule, credits
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containment accident pressure in the sense that containment accident pressure is needed during the reflood phase to assure proper re-flooding of the vessel, especially for PWRs. But implicit in that is the fact that there is a containment accident pressure that's assumed, and that's specified in Appendix K of 10 CFR 50.

8 Also, dose calculations are done, assuming 9 the leakage is at ELSIV A which is less than a 1 10 percent mass leakage in 24 hours. That also assumes 11 that all that other stuff is kept in the reactor, so 12 the reactor's containment integrity is assumed, and 13 the pressure is maintained. Although you're trying to 14 lower the pressure, the dose calculations are done 15 assuming a very small leak rate.

ATWS, station blackout, Appendix R events have acceptance criteria that require a demonstration of containment integrity as part of doing a satisfactory acceptable analysis.

And, finally, some of the reasons we've accepted the credit are a high confidence in containment integrity, conservative calculations, the design of the emergency pumps, no significant impact on emergency operating procedures, and minimal impact on risk. And if I could now, I'd like to --

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1	MEMBER APOSTOLAKIS: So let me understand
2	something. In an earlier slide, you said this minus
3	6, I don't know what one is that, 7? Could we go
4	back. Yes, for beyond design-basis accidents and
5	acceptable level so, in other words, does that mean
6	that depending on the frequency of the accident, you
7	may decide yes, they don't have sufficient pressure,
8	but it's of such low probability that safety is
9	maintained. Is that
10	MR. LOBEL: Right. We Marty Stutsky
11	has talked about this.
12	MEMBER APOSTOLAKIS: Right.
13	MR. LOBEL: We go back to the well, the
14	licensee goes back to their PRA, puts assumptions in
15	that are a function of containment accident pressure,
16	and then looks at the probability of losing
17	containment accident pressure. And then, like I say,
18	the other part of this is the beyond design-basis
19	events that are typically analyzed, Appendix R, ATWS,
20	and the station blackout. They're analyzed to see
21	that there's acceptable results.
22	MEMBER APOSTOLAKIS: Right.
23 [.]	MEMBER POWERS: When you say they go back
24	to their PRA, you are, of course, speaking of a PRA
25	that includes fire as an initiator, seismic as an
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1 initiator? MR. LOBEL: Sometimes fire is included. 2 3 My understanding is in some cases fire isn't included, 4 and the review is done looking at the Appendix R 5 program separately. But they do look at sets that 6 involve containment pressure, and put -- make sure 7 that consideration is given to the loss of containment 8 pressure, and the effect that has on the ECCS. 9 MEMBER POWERS: Thank you. 10 MR. LOBEL: I'd like now to introduce Mr. 11 Randy Blunt of the BWR Owner's Group to get on with 12 the main part of this presentation. 13 MEMBER ABDEL-KHALIK: My understanding is that you have some backup slides that may have some 14 15 proprietary information. And if questions come about 16 that require you to show these slides, that we will 17 have to wait until the closed session at the end of 18 this period. 19 That is correct. MR. BLUNT: 20 MEMBER ABDEL-KHALIK: Okay. Thank you. 21 MR. BLUNT: Verify the question, write it 22 down so we'll get it covered properly when we go back 23 to that. 24 MEMBER ABDEL-KHALIK: Yes. 25 MR. BLUNT: Well, I appreciate the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

1 opportunity to come here. This is a topic that we're 2 very pleased to work with NRC on that came up as an 3 issue from the ACRS, and we formed a committee going 4 forward, and we believe this is an area that we're working together to improve the industry. We do have 5 6 our committee experience and technical experts here to 7 address questions and concerns. And our Committee 8 Chair, Alan, here, who's going to go over this in 9 detail with his presentation. I just wanted to open 10 it by saying we do appreciate the opportunity to 11 present our topical here. Thank you. Alan.

12 MR. WOJCHOUSKI: Thank you. Good morning 13 everybody. My name is Alan Wojchouski. I work at 14 Monticello Nuclear Generating Plant. I have an 15 Undergraduate degree in Mathematics, Physics, and 16 Computer Science minor, and picked up a Master's 17 degree in Nuclear Engineering from VPI. I worked at 18 Exxon Nuclear for several years doing neutronics for 19 Perry Island Units I and II. Then I moved to 20 Monticello, worked at Monticello Nuclear Generating 21 Plant for the last 28 years. Currently, I'm the 22 System Engineer on primary containment and RHR. So 23 with that, I'll start into my presentation.

The purpose of the presentation is to provide background, objectives, and work scope,

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provide an overview of the licensing topical report, to describe how the licensing topical report addresses the ACRS' concerns with granting containment overpressure credit.

5 Late in 2005, the BWR Owner's Group was 6 requested to provide information that could be used by 7 the staff to address ACRS issues with approval of 8 containment over-pressure credit. The Committee that 9 I'm the Chairman of was approved by the Owner's Group 10 Executives in May of 2006.

11 The BWR Owner's Group main objective was 12 to develop guidance for NRC approval for credits for 13 containment over-pressure where practical alternative 14 approaches do not exist; conservatisms in the 15 methodology. I'll discuss the safety implications, 16 and define reasonable and consistent requirements and methodologies. 17

The key results from our work that will be 18 explained in more detail as I progress through the 19 20 presentation are that the DBA-LOCA, and special events, both the change in the core damage frequency, 21 22 and the change in the large early release frequency fall within Reg Guide 1.174, a very small category of 23 24 risk increase region. Deterministic approach, which 25 is basically the current licensing basis approach, is

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a conservative assessment of the net positive suction 1 2 head available. MEMBER APOSTOLAKIS: What's the meaning of 3 4 the first bullet? I quess I don't see it. "The 5 change in CDF". This change is due to what? Maybe 6 you said it, and I missed it. 7 The change in loss of MR. WOJCHOUSKI: 8 containment over-pressure. 9 MEMBER CORRADINI: In other words, if 10 somehow you magically fall to --11 MR. WOJCHOUSKI: You go ahead and have no 12 over-pressure except for atomospheric pressure. 13 Underneath those conditions, what happens to your ECCS 14 pumps? We did a risk assessment based on that, and 15 compared it off to the Reg Guide requirements, and it was in the 10 to the minus 9th region, which puts it 16 17 into the very small category. I'll be getting into that a little bit further within the presentation. And 18 19 if there's additional questions, I have more expertise 20 here to help me out with those. MEMBER POWERS: I mean, it's truthful and 21 mysterious because the design-basis accident, I would 22 23 expect the delta CDF associated with a DBA to be --24 it's still very small. I mean, it's kind of 25 meaningless, isn't it? **NEAL R. GROSS**

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1 MR. WOJCHOUSKI: We still have to ahead 2 and evaluate what granting containment over-pressure 3 is in risk-based. That's the reason why the Reg Guide 4 has different bands to go ahead and categorize it as 5 whether it's medium risk, small risk. That's why we 6 went ahead and did that type of evaluation. 7 MEMBER APOSTOLAKIS: 1.174 refers to 8 permanent changes in the licensing basis. This is a 9 permanent change? 10 MR. WOJCHOUSKI: If you're asking for 11 containment over-pressure where you didn't have it 12 before, it would be considered a permanent change. 13 Some plants --14 MEMBER APOSTOLAKIS: So we shouldn't worry 15 about the conditional probability, incremental 16 conditional probabilities that we calculate under 17 other circumstances? Time, in other words, during the 18 accident, because we have limits on those, too. It's 19 probably too small. 20 MEMBER POWERS: It seems to me that what 21 it says --22 MEMBER APOSTOLAKIS: Huh? 23 MEMBER POWERS: It seems to me that the 24 risk for the pump is very small, which is a remarkable 25 conclusion. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1	CHAIRMAN SHACK: Let's let him get to
2	MEMBER APOSTOLAKIS: Okay.
3	CHAIRMAN SHACK: I mean, he's got lots of
4	slides.
5	MR. WOJCHOUSKI: Statistical approach,
6	which is a realistic, demonstrates the margin inherent
7	in the deterministic approach. Low pressure ECCS
8	performance from the analysis that we conducted was
9	shown not to be dependent on the containment
10	integrity, and I'll go over that in more detail later.
11	And pumps have been shown to survive periods of
12	operation, the net positive suction head available is
13	less than the net positive suction head
14	MEMBER ARMIJO: For how long? Are you
15	going to get into that? How long can these things
16	run? Will you get into that later?
17	MR. WOJCHOUSKI: I will get into that to
18	a certain extent.
19	MEMBER APOSTOLAKIS: Give us results
20	first.
21	MR. WOJCHOUSKI: Okay. It's a style that
22	was recommended to try to have you guys think about it
23	as I go through the rest of the presentation.
24	MEMBER POWERS: We're thinking now, were
25	we? But you're going to get to that.
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1	MEMBER APOSTOLAKIS: Yes.
2	MR. WOJCHOUSKI: Yes. Okay. Work scope.
3	The project work scope of the committee was to
4	identify an example plant, that was Monticello Nuclear
5	Generating Plant. Monticello is a Mark I containment,
6	so we're one of the ones that have been granted in the
7	past containment over-pressure credit; review of
8	containment analysis inputs, and methods for
9	conservatisms; perform a sensitivity study to assess
10	the impact or the input parameters on the containment
11	response. And then, also, we identified the input
12	parameters for the example plant NPSH analysis. That
13	could be changed to minimize or gain over-pressure
14	credits.
15	MEMBER ABDEL-KHALIK: Now why and how was
16	Monticello selected?
17	MR. WOJCHOUSKI: Monticello was selected
18	because we were, basically, the next one up for EPU,
19	Extended Power Uprate. So as you go ahead and
20	increase your power, the containment analysis will
21	have your suppression pool temperature start to
22	elevate. As your suppression pool temperature goes
23	up, guess what? Okay.
24	MR. BLUNT: Also, because some of the
25	analysis that was being done as part of their power
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uprate, that would support some of the work was going to be performed at that time for the uprate, so it was the most current data that we had to report to the Committee without having to redo all the work.

5 WOJCHOUSKI: ahead and MR. We went performed containment analysis on the example plant 6 7 deterministically using licensing-basis inputs, and 8 also statistically using realistic inputs, and then 9 compared the results. In order to do the statistical 10 analysis, we had to develop a statistical methodology 11 first in order to do that, and I'll be discussing 12 that, also. Performed risk assessment using results 13 of the realistic analysis, and assessed the effects of 14 the credit on containment over-pressure for special 15 So we didn't do actual calculations on the events. 16 special events, but we went ahead and looked at those 17 special events and did a risk assessment on those, 18 also.

MEMBER MAYNARD: Back to the first bullet 19 20 there. And if you're going to get into it later, 21 that's fine, too, but you say develop method, 22 licensing-basis inputs. Again, we were talking 23 earlier licensing-basis inputs, there's times when 24 you're wanting to maximize pressure, times when you're 25 wanting to minimize pressure.

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1	MR. WOJCHOUSKI: NPSH you want to minimize
2	the pressure, and maximize the suppression pool
3	temperature. I have a couple of slides that will kind
4	of go through that and describe a little bit more
5	detail, but if you've got a question after those,
6	bring it up again.
7	MEMBER STETKAR: Alan, you said that for
8	special events, Appendix R, station blackout, and
9	ATWS, you did not run those through the risk
10	assessment.
11	MR. WOJCHOUSKI: For the Committee we did
12	not do that analysis, like Monte Carlo analysis, or
13	deterministic calculations for the Committee work, but
14	we did is in the risk assessment, went ahead and
15	evaluated those in a general fashion with bounding
16	numbers.
17	MEMBER STETKAR: I'm assuming you're going
18	to get to that.
19	MR. WOJCHOUSKI: We will get to that.
20	MEMBER STETKAR: Okay.
21	MR. WOJCHOUSKI: And if you want actual
22	more detail, we have a special breakout presentation
23	that we can go through and go over that in more
24	detail.
25	MEMBER ABDEL-KHALIK: Did you skip one?
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1	MR. WOJCHOUSKI: I think I just went back,
2	didn't I?
3	MEMBER ABDEL-KHALIK: No, you went
4	forward. You want to go through 8.
5	MR. WOJCHOUSKI: Number 8. There we go.
6	Thank you. The methodology employed is you calculate
7	the net positive suction head available without
8	containment over-pressure. This is done
9	deterministically, basically, the same license-basis
10	type assumptions we've had. Conservative assumptions
11	are used on that, and then you determine the wetwell
12	pressure so that NPSHa equals NPSHr.
13	MEMBER CORRADINI: And let me just repeat.
14	Conservative here means maximize the suppression pool
15	temperature, estimate with some sort of approved
16	method the losses, so your two negative terms are as
17	high as possible. As high as possible is wrong; as
18	high as required by the methodology.
19	MR. WOJCHOUSKI: Correct. What you do in
20	containment analysis is you pick your inputs into the
21	containment analysis, such as maximum river
22	temperature for ultimate heat sink, minimum TOROS
23	water level so that you'll actually drive more heat
24	into it, and for NPSH we have several different
25	scenarios in which we minimize the containment
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pressure.

MEMBER CORRADINI: Okay. Thank you.

MEMBER BANERJEE: How expensive is it to change the pumps? I mean, let's look at our last -Susquehanna, they have pumps that don't require water pressure.

7 MR. WOJCHOUSKI: Ι can speak for 8 Monticello. I can't speak for everybody else. We 9 were a turnkey plant. We have RHR and core spray 10 pumps in corner rooms in the basement. We have the bolts that hold them in place go four feet down into 11 12 rebar and the concrete sub-basement, and there's 13 approximately 12 feet of concrete and rebar underneath If we went ahead and tried to put in deep well 14 it. 15 pumps, like we have on RHR service water, we would 16 have to go and excavate all of that underneath.

MEMBER BANERJEE: So it's just an accident of history you're stuck with this. Now you want to uprate, you want to sharpen your pencil to make sure you can make it work.

21 MEMBER MAYNARD: It could also create more 22 problems than what you solve. Some of these 23 situations, you could create a bigger problem by 24 digging down deeper and doing things in your 25 containment, than leaving the pumps that are there,

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1	and using legitimate credit that's available.
2	MEMBER BLEY: These are pretty rugged
3	pumps, none of the problems
4	MEMBER SIEBER: You give credit for
5	operation below the manufacturer's required NPSH,
6	generally, and also for limited periods of time.
7	Allows you to ride through some
8	MEMBER MAYNARD: But, typically, you don't
9	like to be putting bigger holes in containment and
10	base mat and stuff than what you would have to.
11	MEMBER BANERJEE: Well, I was wondering
12	whether you could change these pumps without having to
13	do that.
14	MEMBER SIEBER: By magic.
15	MR. WOJCHOUSKI: There really isn't a
16	design that I know of. That's why it's not a credible
17	
18	MEMBER MAYNARD: You typically maybe get
19	a little bit, but to get any significant improvement,
20	you end up having to go with a deeper draft pump.
21	MEMBER SIEBER: Well, these aren't deep
22	draft pumps, are they?
23	MR. WOJCHOUSKI: No.
24	MEMBER SIEBER: They're horizontal.
25	MR. WOJCHOUSKI: Not these.
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1	MEMBER MAYNARD: Not these.
2	MR. WOJCHOUSKI: The ones I have is
3	vertical.
4	MEMBER SIEBER: PWRs are deep draft, some
5	of them.
6	MEMBER BANERJEE: Please continue.
7	MR. WOJCHOUSKI: Moving on. If the NPSHa
8	without containment over-pressure is lower than the
9	NPSH required, you insure that you have enough wetwell
10	pressure so that the NPSHa with containment over-
11	pressure is higher than the NPSH required. You
12	evaluate statistically, this is a Monte Carlo-type of
13	arrangement, which I'll discuss.
14	This provides a realistic evaluation of
15	the events in support of the containment over-pressure
16	request based upon the deterministic calculations.
17	What I'm trying to say with that bullet is, we are
18	still going to license with the deterministic
19	calculations, and we're going to do the statistical
20	methodology to show you what the margin is of
21	realistic calculations rather than piling on all the
22	conservatives that you do with the deterministic.
23	I'll have examples of that that you can see the
24	differences between the two.
25	NPSH overview. The available net positive
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1	suction head can be expressed with the following
2	equation. This is just a rewrite of what you've
3	already seen before. We got the wetwell air pressure,
4	minus the vapor pressure, times 144 over the density,
5	minus your pool elevation, minus your pump elevation,
6	minus your suction strainer and line losses.
7	MEMBER CORRADINI: Since you put numbers
8	in there, this is in feet?
9	MR. WOJCHOUSKI: This is all in feet.
10	MEMBER CORRADINI: Thank you.
11	MR. WOJCHOUSKI: Go ahead
12	MEMBER BANERJEE: Psia.
13	MR. WOJCHOUSKI: Yes.
14	MEMBER BANERJEE: Mixed units.
15	MEMBER CORRADINI: The left-hand side.
16	MEMBER STETKAR: The answer is feet.
17	MR. WOJCHOUSKI: When we converted over to
18	Hww, that's in feet. And what we've done on here is
19	there's two terms that we kind of ahead for our
20	analysis here, we call it Hww, which is a term which
21	we can get out of the containment analysis, and which
22	General Electric does a containment analysis for us,
23	and they come up with that term. The HPL is basically
24	the suction strainer and the suction line losses that
25	the utilities typically will go ahead and calculate,
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1	and by adding those two factors together, then you
2	come up with your NPSH available. So it's a little
3	different, but it's the same basic equation.
4	Deterministic approach, current licensing-
5	basis accident scenarios with applicable limiting
6	single failures are used in the determination of net
7	positive suction head, bounding values of the
8	containment initial conditions are used resulting in
9	the pool temperature response. It is maximized when
10	the available wetwell pressure is minimized. This
11	approach will give you a conservative assessment of
12	your available net positive suction head.
13	MEMBER ABDEL-KHALIK: Are you going to
14	provide a list of the assumptions that allow you to
15	obtain this conservative result?
16	MR. WOJCHOUSKI: The details of that are
17	within the license topical report. We have it, it's
18	there, and it's available. I didn't put it into the
19	slide. I do have slides on here that says what we
20	went ahead and used statistically varied, and which
21	are basically the same ones. We'll get to that, and
22	you can see a list of those.
23	MEMBER CORRADINI: Can I ask a different
24	question?
25	MR. WOJCHOUSKI: Sure.
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1	MEMBER CORRADINI: So back when you have
2	NPSHr, that's a manufacturer's number?
3	MR. WOJCHOUSKI: NPSHr is provided by the
4	pump manufacturer.
5	MEMBER CORRADINI: Under what conditions?
:	
6	I mean, where in the pump curve? I mean, are they
7	looking at full run out? Where are the
8	MR. WOJCHOUSKI: You will do it at
9	different pump flow rates. The story behind this is
10	on my ventures with plants, they went ahead and give
11	you something; Bingham Pump Company gave you something
12	called a sales curve.
13	MEMBER CORRADINI: Right.
14	MR. WOJCHOUSKI: What they did is
15	theoretically calculated what the NPSH was over the
16	flow rates of interest, 3,000 to 4,500 gpm for our
17	type of pumps. When they sold you the pumps, they
18	went ahead and took those into the test stand. They'd
19	verify that they had at least that much NPSHr, so that
20	was taken care of. But the problem was that isn't the
21	standard net positive suction head required curve of
22	3 percent total dynamic head drop. That's what in the
23	standard. That pump manufacturer will put it in a
24	test rig, same type of diagram which Rich had up
25	there, where he had the tank. They will go ahead and

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1	actually pull a vacuum on it to reduce the suction
2	pressure on it until they start getting cavitation, in
3	which they do it first of all with adequate NPSH, lots
4	of volume on it, lots of over-pressure, find out what
5	the total dynamic head of the pump is. Then they'll
6	go ahead and reduce it until they get a 3 percent drop
7	in total dynamic head at that flow rate and take that
8	point. They'll change the flow rate, do the same
9	thing, so 3 percent they have another point on that
10	curve, and they will continue that through the range
11	of the and that's how you get your NPSH 3 percent
12	curve.
13	They can also, if you ask them to, and
14	they have the data for it, they can generate a 5
15	percent curve, also. But the standard is a 3 percent
16	curve total dynamic head.
17	MEMBER CORRADINI: And that's what you use
18	as the NPSHr.
19	MR. WOJCHOUSKI: That what we go ahead and
20	put into our calculations on NPSHr. Monticello, prior
21	to this EPU did not have a curve, a 3 percent curve
22	for RHR. We use the sales curve, which was
23	conservative. So, in actuality, by me going out to a
24	pump manufacturer and asking him for a 3 percent curve
25	to the standard, I provide myself by reducing the
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1	margin in that area, provide myself more net positive
2	suction head available.
3	MEMBER CORRADINI: So you don't have it
4	for your pumps. But when I just wanted to ask it,
5	because you use the I want to say it back to you so
6	I get it right.
7	MR. WOJCHOUSKI: Okay.
8	MEMBER CORRADINI: Which is the NPSHr
9	could be represented by the endpoint sets required in
10	the pump curve as delivered, but then you can come
11	back and do a bench test to see what the based on
12	3 percent, and it tends to fall below that.
13	MR. WOJCHOUSKI: Right.
14	MEMBER CORRADINI: So for some pump
15	manufacturer, what's that variation? What's the
16	difference there?
17	MR. WOJCHOUSKI: It depends on the pump
18	design. And they have to go in and find test cases
19	which they've run in the past.
20	MEMBER CORRADINI: To compare.
21	MR. WOJCHOUSKI: To compare, and come up
22	with those curves. A lot of times they can use the
23	data they originally had from your sales curve, and
24	they have to add additional data.
25	MEMBER CORRADINI: Are we talking inches
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1	or feet?
2	MR. WOJCHOUSKI: We're talking feet.
3	MEMBER BANERJEE: They test some, or they
4	have data on some equivalent pump?
5	MR. WOJCHOUSKI: Right.
6	MEMBER BANERJEE: But not your pump,
7	because it's
8	MR. WOJCHOUSKI: Our pump was from the
9	sales curve which they actually had. Then they do
10	comparisons to identical pumps that they have in their
11	archives, because they did all this sort of testing
12	back in 1968. Kind of a side on this, I asked them if
13	I wanted to go ahead and have a pump built, and have
14	it tested, to get nice curves in your data, I asked
15	one of their engineers, and off the top of his head he
16	said, "Well, it would probably cost you \$1 million to
17	get it to upset our production rate, and then we have
18	approximately a year delay on our test facility for
19	testing the pumps, because we have so much business in
20	oil business right now." I asked the question. I was
21	feeling it out, seeing what was happening.
22	MEMBER BANERJEE: So your pumps were
23	tested back in 1968, the identical pumps.
24	MR. WOJCHOUSKI: My pumps were tested in
25	1968.
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1	MEMBER BANERJEE: What is the sort of
2	variability in the results that you get, sort of like
3	between
4	MR. WOJCHOUSKI: We had four different
5	pumps, we had four different serial numbers, we had
6	four unique tests done on that. The variability was
7	underneath a foot, usually about, from my recollection
8	of them at the different points is about a half a foot
9	or less.
10	MEMBER ARMIJO: I don't know anything
11	about pumps, but over a long period of time with
12	maintenance and operation, and everything else, how
13	much
14	MR. WOJCHOUSKI: Degradation of the pump?
15	MEMBER ARMIJO: does it change? Yes.
16	MR. WOJCHOUSKI: Performance? We have
17	I'm getting off the subject again, but I'll answer
18	the question quickly and then move on.
19	MEMBER ARMIJO: You don't have to spend a
20	lot of time. Just
21	MR. WOJCHOUSKI: We an in-service testing
22	program in which we go ahead and have set up limits of
23	the pump DT. That indicates how well the pump is
24	performing, so we have acceptance bounds like that.
25	I trend those. If I see a negative trend on it, I
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1	will go ahead and replace the rotating element on the
2	pump and rebuild it with wear rings. We've done that
3	several times, so we try to maintain it.
4	MEMBER SIEBER: Generally, the wear is on
5	the outer side of the pump.
6	MR. WOJCHOUSKI: There's replaceable wear
7	rings that
8	MEMBER SIEBER: You're leaking backwards,
9	which really doesn't change NPSH.
10	MEMBER BANERJEE: So these are there's
11	a volume in these pumps. The volume does not affect
12	it, it's only the impeller that gets affected?
13	MEMBER SIEBER: Well, there's replaceable
14	rings.
15	MR. WOJCHOUSKI: Replaceable rings both on
16	the casing of the pump, and on the impeller.
17	MEMBER SIEBER: Right.
18	MR. WOJCHOUSKI: Moving on. Statistical
19	approach takes credit for variabilities in the
20	analysis input values, the order statistic method is
21	employed, input variabilities are defined
22	statistically and combined through the Monte Carlo
23	process. Fifty-nine random draws are made from the
24	corresponding probability distributions to achieve a
25	95-95 probability confidence level. Containment
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pressure and temperature time histories are calculated for each of the 59 cases.

MEMBER STETKAR: Alan, what are the typical ranges on these input variables? I mean, are we talking about -- you said you have probability distributions for each input variable. Are we talking about a factor of five between the fifth and the 95th percentile of the input? Are we talking about a factor of 100, or 2?

10 give you MR. WOJCHOUSKI: Let me an 11 example, and maybe we can answer your question that 12 way. One of the inputs that we use for this analysis 13 was river water temperature. That's your ultimate 14 heat sink temperature. What I did at Monticello is I 15 went and took five years of back data every four 16 hours, and then came up and bend them into different 17 bends, from 90 degrees, to 85 degrees, from 85 to 80, 18 and going down, and then calculating how many days 19 that I actually hit over those five years. And then 20 exceedance probability that's have an you can generated off of that. That's one of the inputs, they 21 22 have the exceedance probability on those temperature 23 ranges. They do a random selection of it, pulls out 24 one of those ranges, and that's what that one variable 25 input is into one of the 90, or the 59 cases.

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45 MEMBER STETKAR: How many bins did you 1 typically have in these discrete distributions? 2 3 Fifty-nine samples is a strange number. That implies 4 to me that somebody really thought about optimizing 5 this Monte Carlo process. I mean, typically you would do hundreds, if not thousands of samples to get a 6 7 decent distribution. MEMBER SIEBER: Fifty-nine pops up a lot. 8 9 It depends on the range MEMBER STETKAR: 10 of your input curve. 11 MEMBER POWERS: He picked fifty-nine because that gives him the 95 percent confidence that 12 13 he sampled 95 percent of the range. MR. WOJCHOUSKI: That's out of the order 14 15 statistic methodology. It has an equation that tells 16 you how to do that, and how many you should really And fifty-nine, I believe, is the minimum to 17 pick. 18 get the 95. 19 CHAIRMAN SHACK: It is the minimum, yes. 20 MEMBER ABDEL-KHALIK: There is a time 21 difference there in this process, and that's what I'm 22 having difficulty with. When you say 95-95, you can 23 say that, in words, that the containment pressure --24 we're 95 percent confident that in 95 percent of the 25 cases that containment pressure will be greater than

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1	this value. Where does the time dependence come in
2	into this sort of wording of the result?
3	MR. DENNIG: Excuse me. This is Bob
4	Dennig, Chief of Containment Branch. Don't you you
5	use the sampling as the starting point, and then run
6	the case.
7	MEMBER SIEBER: Right.
8	MR. DENNIG: Right. So there's no more
9	imposed, externally imposed or extrinsic time
10	management that goes on. The case is just you select
11	that value and run that case to the end. Another
12	random set, those inputs run that case to the end.
13	MR. WOJCHOUSKI: And it's the number of
14	cases that give you the 95-95. We've got a
15	MR. BOLGER: This is Fran Bolger from GE
16	Hitachi. When we evaluate the data, we process the
17	output at each of our time increments, so we actually
18	will calculate a 95-95 at discrete time increments
19	throughout the event so that we can establish what the
20	minimum margin is at all time increments.
21	MEMBER ABDEL-KHALIK: So the 95-95 value
22	that you have, many different values that come from
23	
24	(Simultaneous speech.)
25	MR. BOLGER: That is correct.
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1	MEMBER ABDEL-KHALIK: Okay. Thank you.
2	MEMBER BANERJEE: So the model that you
3	use is frozen for these 59 runs?
4	MR. BOLGER: I'm not
5	MEMBER BANERJEE: It's just the inputs
6	that are changing.
7	MR. BOLGER: That's correct, the model is
8	the same.
9	MEMBER BANERJEE: None of the model
10	parameters are changing.
11	MR. BOLGER: Well, there are model
12	parameters that are part of the sampling. For
13	example, decay heat would be considered a model
14	parameter, and that's one of the items that's
15	MEMBER BANERJEE: In fact, it's an input
16	in this.
17	MR. BOLGER: That is correct, it is an
18	input.
19	MEMBER BANERJEE: You're only changing the
20	inputs.
21	MR. BOLGER: That is correct.
22	MEMBER ABDEL-KHALIK: So you're
23	essentially drawing a limit curve that bounds all the
24	time histories of the containment pressure, just to
25	align underneath all of those 59 transients.
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1	MR. BOLGER: That's correct.
2	MEMBER BANERJEE: It's a sensitivity to
3	inputs, if I understand. But what about the model
4	parameter
5	MEMBER CORRADINI: But, normally, my
6	impression from a lot of this is the uncertainties
7	I mean, the initial conditions they're talking about
8	drive the uncertainty, as I understand.
9	MEMBER BANERJEE: I know that. I'm
10	asking the question. Do they drive the uncertainties,
11	or do the model parameters which are built into the
12	models drive the uncertainties?
13	MR. BOLGER: It's a combination of
14	factors. For example, the decay heat is an important
15	term in the uncertainty. But, also, the other input
16	parameters regarding to the plant parameters are also
17	very important.
18	MEMBER BANERJEE: But what about the model
19	itself?
20	MR. BOLGER: There is no variation made on
21	the model.
22	MEMBER BANERJEE: There must be parameters
23	within the model.
24	MR. WOJCHOUSKI: Let me move on a little
25	bit on here, and I'll show you what the different
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1	parameters are that we defined statistically, and are
2	variable within
3	MEMBER BANERJEE: We understand you're
4	varying the inputs. I'm just now trying to understand
5	what is in the model. What is in the model which is -
6	- I'm
7	MEMBER ABDEL-KHALIK: My understanding is
8	the model that is being used in this is the SuperHex
9	code.
10	MR. BOLGER: Essentially, that's correct.
1.1	The SuperHex code is used.
12	MEMBER ABDEL-KHALIK: And that model, or
13	that code has never been really approved the staff,
14	has it?
15	MR. WOJCHOUSKI: That is the code which
16	people do the deterministic calculations on, and it's
17	been gone through the staff.
18	MEMBER ABDEL-KHALIK: But do we have a
19	document that describes
20	MR. LOBEL: This is Richard Lobel from the
21	staff. The SuperHex codes have been used by GE for
22	decades now. In 1993, the staff wrote a memo to GE
23	saying that SuperHex was approved with the condition
24	that benchmarks be done for every application,
25	comparisons with FSAR results, that in a lot of cases
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50 1 were done with other codes. That was done for a 2 while, and the results were always good, good 3 comparisons. 4 As part of some extended power uprate 5 reviews, the staff did independent calculations with 6 the contained code to compare to SuperHex, and both 7 curves fell practically right on top of each other, so 8 we have done audits, and SuperHex has been used for a lot of different applications. And, although we never 9 10 wrote an official SER, it's been the licensing code 11 for a long time. And it's not that unusual for 12 containment codes not to be approved by the staff. 13 It's not like some of the systems codes and core 14codes, and that kind of thing. Typically, containment 15 codes aren't approved by the staff. 16 MEMBER ABDEL-KHALIK: Thank you. Please 17 proceed. 18 MEMBER BLEY: I'm sorry. Back to your 95-19 95, I'm thinking of the PRA implications of how you're 20 doing the calculation. That tells me there's a 95 21 percent chance that 5 percent of the time the pressure 22 is lower than this value you've calculated. Did you 23 take that into your PRA results, five times 10 to the 24 minus 2 chance that you don't meet NPSH? 25 MR. WOJCHOUSKI: Vince, would you help me **NEAL R. GROSS**

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out on this one?

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2 did. MR. ANDERSEN: Yes, we And, 3 actually, the number is higher than 5e to the minus 2, 4 because the answer is actually lower than required. 5 So we are somewhere up above the 5 percent point. So, 6 yes, if the NPSHa, the 95-95 point that they got out, 7 equaled what the NPSHr, as required, that would be 8 perfect for the PRA. That would be the 5e to the 9 minus 2 we've shove into the PRA, but it's not, so 10 it's lower than it, so the number is higher. So it's 11 10 percent, 50 percent for two different scenarios 12 that we get into the inadequate NPSH problem. 13 MEMBER BLEY: Will we see some details on 14 that? 15 MR. ANDERSEN: Yes, we have slides on 16 that, if you want to get into it. Yes, we have slides 17 on that. 18 MEMBER BLEY: Okay. MR. ANDERSEN: The actual number itself is 19 20 not the driver in the risk, because we set that probability that you'll have the bad conditions at the 21 22 onset of the accident to 1.0, and the risk is still 23 What drives it are the low frequencies of the low. 24 initiator, the low frequency of an unisolated 25 containment, et cetera. NEAL R. GROSS

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MEMBER BANERJEE: I do have a question on SuperHex. Is there an internal apportioning of where the heat actually goes that is somehow empirical within the code?

5 MR. BOLGER: This is Fran Bolger from GE, 6 again. SuperHex is an integral model, and heat has to 7 travel from the reactor vessel into the drywell. 8 There's a pool model in the drywell. You have to get 9 liquid transferring from that pool through the vents 10 into the suppression pool. You have to have mass 11 transfer between the pool and the vapor space.

12 Now as far as how is the heat transferred 13 from the reactor vessel into the drywell, there's 14 different types of techniques you can use to try to 15 maximize the amount that goes into the liquid, which 16 then goes into the suppression pool. When you're 17 trying to minimize pressure, what you're trying to do is maximize the amount of cold liquid that is acting 18 19 like a spray into the drywell, so that that will drop 20 the pressure in the drywell, and that's what we try to do when we do the simulation. 21

22 MEMBER BANERJEE: You actually have an 23 internal switch which can change how the heat is 24 apportioned. You have to. There's no other way to do 25 it.

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MR. BOLGER: Well, we have -- for example, 1 2 one of the things you can do is when you have liquid exiting through a break, you can establish, well, how 3 4 much of that liquid should be considered in thermal equilibrium with the air space such that you would 5 calculate the pressure in the air space. And then how 6 7 much of that liquid would go directly -- can be 8 considered to go directly into the pool, which then 9 acts on the temperature of the pool. These parameters are 10 MEMBER BANERJEE: 11 tuned to experiments? 12 MR. BOLGER: I think -- I don't have great 13 expertise on this area. In the shorter portion of the 14event where there was test data, to some extent there 15 is -- some of this apportionment is qualified. But as 16 you continue into the longer term of the event, you attempt to set some of these inputs such that you set 17 18 them conservatively. I would say that we did do some 19 sensitivity analysis on some of these terms to 20 determine whether or not there was a significant 21 impact on the results, and we found that even if we substantial 22 made fairly change in this а 23 apportionment, that there was not a significant impact on the result. 24 25 MEMBER BANERJEE: That's useful to know.

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Is that documented somewhere?

2 MEMBER ABDEL-KHALIK: Will the topical 3 report include a description of the model in SuperHex 4 code?

MR. BOLGER: No.

MEMBER BANERJEE: Because there are two sets of uncertainties here. One is related to the input parameters, the other is what is the internal parameters of these codes, so I think we need to understand the effect of uncertainties. And if you have already done this work, that would be useful to see.

13 MR. LOBEL: This is Richard Lobel from the staff. Let me just say quickly that one of the bases 14 15 for starting this work when we were discussing it with 16 GE and the Owner's Group was that SuperHex was assumed 17 to be fixed, and it was used all the time, and so it 18 wasn't going to be guestioned for this. Its ability 19 to do these calculations had been proved enough that 20 it wasn't part of this project.

CHAIRMAN SHACK: Let me just ask again, though. I'm assuming that you're doing this in a design-basis sense, that whatever the input variable is, you're apportioning your heat input to maximize your pool temperature, and minimize your containment

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1 pressure for each set of those, so you're really doing 2 a conservative calculation for each set of input 3 variables, even though you're now realistically 4 varying the input variables. 5 That's correct. MR. BOLGER: 6 MEMBER BANERJEE: Conservative can be two 7 different things, because in a certain sense you're 8 trying to maximize the pressure, and in another sense 9 you might be trying to minimize it. 10 CHAIRMAN SHACK: But in these particular 11 calculations he has a goal. When he does the other 12 calculation to look at the containment over-pressure 13 he sets it a different way. But, I mean, to look at 14 uncertainties here, this is not a realistic code, so 15 uncertainties vou're looking at sort of in а 16 deterministic analysis. 17 I'm trying to grapple MEMBER BANERJEE: 18 with what you are really doing here. 19 MR. WOJCHOUSKI: Moving on. Statistical 20 approach allows the calculation of more realistic net 21 positive suction head available values, which can be 22 used quantify the conservatisms in the to 23 LOCA deterministic analysis. The design-basis 24 approaches, you do the deterministic approach, which 25 uses either the maximum or the minimum of each of the NEAL R. GROSS

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1 input parameters dependent on which direction is 2 conservative for your analysis. The statistical approach, all the input 3 4 parameters are not at their extremes at the same time, 5 so statistical approach with realistic assumptions 6 that input the parameters that can be selected 7 statistically are defined and selected. 8 MEMBER POWERS: How do handle you 9 correlations? 10 MR. WOJCHOUSKI: Meaning independence of 11 the input data? 12 MEMBER POWERS: Yes. I mean, you've got a set of statistically varied parameters here, some of 13 which are manifestly correlated with each other. How 14 15 do you handle correlations? WOJCHOUSKI: Within the selection 16 MR. 17 thing, they put boundaries on it so that --I'm MEMBER POWERS: That's not what 18 19 asking. I'm asking how you handle correlations. MEMBER BLEY: On the chance of one value 20 changes the likelihood of another value? 21 22 MEMBER ARMIJO: Some things have to move 23 together. 24 MR. WOJCHOUSKI: That's right. Some of 25 them are interdependent on each other. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	MEMBER ARMIJO: Yes, some are
2	interdependent, some are correlated.
3	MR. WOJCHOUSKI: Well, for the
4	interdependent stuff, what we went ahead and did is
5	for drywell pressure, you cannot have your suppression
6	pool pressure greater than the drywell pressure,
7	because there are vacuum breakers. So as the pressure
8	in the wetwell increases, it will relieve itself into
9	the drywell.
10	MEMBER POWERS: What I'm asking you,
11	you're going to go through and sample these things,
12	and you've defined an uncertainty distribution for a
13	parametric value. Some of the values will be
14	correlated with each other. How did you tell the
15	sampling, the Monte Carlo sampling that there was a
16	correlation?
17	MR. WOJCHOUSKI: I'll have to ask for some
18	help on that one.
19	MR. BOLGER: This is Fran Bolger of GE.
20	In some cases, like Alan has stated, when the sampling
21	was done, parameters were forced to follow each other
22	where that was appropriate. For example, the pool
23	temperature and the air space temperature were
24	correlated together, so they were held together during
25	the sampling process. Other things that were found to
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1 be independent with the data process, for example, the 2 service water temperature and the initial pool 3 temperature, which you might think would be 4 correlated, which actually they were shown to be 5 independent of each other, were sampled independently 6 in the analysis. 7 MEMBER POWERS: I'm still not 8 understanding. How did you set up your distribution 9 so that the Monte Carlo sampling knew things were 10 correlated? And you did not. I think you sampled 11 them as though they were independent. 12 MEMBER STETKAR: Yes, let's ask them. Ιf 13 these are the variables that were sampled, is the 14 all statistically assumption that they are 15 independent? Was that assumption made? 16 MR. BOLGER: The answer to the question is 17 no. Certain parameters that are correlated with each, 18 for example, liquid temperature and air space 19 temperature, were statistically varied along the same 20 trajectory. 21 MEMBER POWERS: So you assumed 100 percent 22 correlation of those. That is correct. 23 MR. BOLGER: 24 MEMBER POWERS: You assumed 100 percent --

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59 1 MR, BOLGER: That's correct. That's 2 correct. 3 So MEMBER STETKAR: vou didn't 4 independently sample those. 5 MR. BOLGER: Those parameters were assumed 6 to be correlated. Other parameters were assumed to be 7 independent. 8 MEMBER ABDEL-KHALIK: So what is the 9 minimum assemble of parameters that is totally 10 independent? 11 MEMBER BANERJEE: It's curiouser, and 12 curiouser. 13 MEMBER STETKAR: Well, there aren't that 14 Which ones were correlated in the sampling many. 15 process? 16 MR. BOLGER: I'll see if I can say it 17 properly. I'd say reactor power was independent, 18 decay heat was independent, the pool temperature 19 was --20 MEMBER POWERS: How can decay heat and reactor power be independent? That can't be. 21 22 MR. BOLGER: Well, reactor power, decay 23 heat as it relates to the starting value is, 24 obviously, related, but when you look at the 25 uncertainty of the distribution as it decays in time, **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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MEMBER STETKAR: Burnup.

3 The suppression MR. BOLGER: pool temperature can be, the air space, and the pressures 4 5 in the pool were assumed to be 100 percent correlated, 6 the service water was assumed to be independent. The 7 heat exchanger was assumed to be independent. The 8 leakage rate was assumed to be independent. 9 Go back to the previous MEMBER POWERS: 10 slide, please, where it says not everything will be at 11 the maximum or the minimum value, but some of them 12 will. 13 MR. WOJCHOUSKI: That's for the 14 deterministic approach. That is with --15 MEMBER POWERS: When we come to the statistics, it says, "All input parameters will not be 16 17 at their extreme values at the same time, but some of 18 them will." Which ones are, and which ones are not? 19 MR. WOJCHOUSKI: That's a random sampling 20 21 MEMBER POWERS: You told me that that was 22 not the case. You told me that some were highly 23 correlated. 24 CHAIRMAN SHACK: He's only sampling from 25 the independent variables. The other variables --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1	MEMBER POWERS: But I can't figure out
2	which ones are the independent
3	CHAIRMAN SHACK: Well, yes, that's a
4	little confusing.
5	MR. WOJCHOUSKI: We're taking random
6	sampling off the independent variables and using that
7	
8	MEMBER POWERS: Which ones are the
9	independent variables? These are not.
10	CHAIRMAN SHACK: I mean, your bullet here
11	is misleading in the sense that they're statistically
12	varied. It makes it sound as though they're all
13	independent, and clearly some subset are not.
14	MEMBER APOSTOLAKIS: I think he means they
15	considered variability in each one of these.
16	Statistically varied, I think that's what it means.
17	It's not a correct
18	CHAIRMAN SHACK: Yes, but you have to know
19	which of these are independent, and which ones are
20	correlated.
21	MEMBER APOSTOLAKIS: I think that but,
22	again, I think there is a slight confusion between
23	correlation and dependence. I think the responses
24	we're getting really refer to dependent value. If I
25	know this value, I know this other one, because I can
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1	calculate
2	CHAIRMAN SHACK: Right. It's 100 percent
3	correlated.
4	MEMBER APOSTOLAKIS: You can call it that,
5	yes. But Dana's question is something different.
6	Right? You're saying if this variable tends to go to
7	high values, this other variable tends to go to high
8	values, too. So somehow you have to account for that.
9	MEMBER POWERS: Oh, if they come back with
10	a sophisticated answer on correlation, I would have
11	gone one more step and asked him whether they were
12	doing Spearman correlation, or Pearson correlation.
13	MEMBER APOSTOLAKIS: Has there been a
14	Subcommittee meeting on this topic?
15	MEMBER ARMIJO: No, this is just an
16	informational
17	MEMBER APOSTOLAKIS: I'm beginning to
18	think more and more from this, we need one.
19	MEMBER POWERS: I mean, here we're looking
20	we're asking a simple question here, and we're not
21	getting a simple answer. The next question, of
22	course, is having defined whatever the truly
23	statistical value sample, what distribution do you
24	use? And how do you keep that
25	MEMBER APOSTOLAKIS: When in doubt, log
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1	normal.
2	(Laughter.)
3	MEMBER ABDEL-KHALIK: But, you see, the
4	trouble with that I think the message that you
5	should take away from this is that this issue needs to
6	be clarified in the topical report, and any follow-up
7	presentation that will be made to the Committee as to
8	an explanation of how the sampling is done.
9	MEMBER BANERJEE: Is this going to come up
10	in front of a Subcommittee?
11	MR. DENNIG: It will review the topical.
12	You'll be able to review the topical.
13	MEMBER ABDEL-KHALIK: I suspect that we
14	will get an opportunity to review the topical report
15	once it is formally submitted. And at that point, we
16	can explore this much further, but they're looking for
17	preliminary input at this stage, and the input you're
18	getting is that this needs to be clarified.
19	MR. BOLGER: Clarify the correlations.
20	MEMBER BANERJEE: Well, certainly the
21	sampling does. But, also, the answer that I've heard
22	about SuperHex up to now is less than convincing in
23	the sense that this was optimized to predict
24	containment pressure for design-basis accidents, where
25	you were trying to calculate the maximum pressure.
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1	Here you're trying to predict the minimum, opposite
2	problem, so I think that needs to be clarified, its
3	capability to do that.
4	MEMBER ABDEL-KHALIK: Moving on.
5	MR. WOJCHOUSKI: Thank you. Statistical
6	approach, the value of Hww is calculated as function
7	of time for each of the multiple 59 trials based on
8	the outputs of pool temperature, pool volume or the
9	height, and the wetwell air space pressure. From the
10	set of the 59 time histories, the minimum value of Hww
11	is obtained as a function of time, and the resulting
12	minimum values are used as the 95-95 value.
13	Going on to the effects of reduced NPSH on
14	ECCS pumps. Effect of reduced NPSHa below the
15	required will cause increased cavitation reduction in
16	the total dynamic head of the pump. The effects will
17	be flow surging, increased noise and vibration levels
18	at the pump, and as the NPSH further reduces a
19	condition called head collapse will be entered. This
20	condition is where the percentage of liquid that is in
21	the vapor phase is so greater that the pump flow
22	ceases. Pump tests
23	MEMBER POWERS: Do you get over-current
24	trip in the motor before that occurs, in practice?
25	MR. WOJCHOUSKI: You could. Pump tests,
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1 this is from the pump manufacturers, were performed 2 for extended periods of time. What was given in the 3 literature was two to three hours, where NPSH was 4 substantially beneath NPSHr. What was meant by that 5 was between three and up to head collapse, but not including head collapse. At that time, the vendor 6 7 said that they did visual examination of the pumps afterwards, disassembly, and there is no visible 8 damage shown. They also went ahead and had cases in 9 which they took pumps into head collapse, in which 10 11 they actually run them for long extended periods of time and seen head collapse, but ran them up until 12 they lost flow completely. After doing that, they 13 also saw no visible damage on the pumps, and that the 14 pumps were shown to recover after NPSH was restored. 15 16 MEMBER BLEY: How long did they let them run in those conditions? 17 MR. WOJCHOUSKI: That I don't have the 18 19 information on. 20 That's really the key. MEMBER BLEY: 21 Almost any pump will run for a little while like that, 22 but we've seen some -- I think the big spray pumps are 23 kind of similar to these, aren't they? Fifteen, 24 twenty-five minutes, burned. I mean, you're not going 25 to use them again. **NEAL R. GROSS**

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1	MR. WOJCHOUSKI: Yes, but I've seen some
2	tests where they actually ran for a day.
3	MEMBER BLEY: With no
4	MR. WOJCHOUSKI: Yes.
5	MEMBER SIEBER: Well, it depends on the
6	pump.
7	MEMBER BLEY: It depends on the pump.
8	MR. WOJCHOUSKI: It really depends on the
9	pump.
10	(Simultaneous speech.)
11	MEMBER SIEBER: Well, a multi-stage pump
12	like a boiler feed pump is going to fail pretty quick
13	because you're pumping a lot of energy into a very
14	small volume, very small mass; whereas, these pumps
15	MEMBER STETKAR: They're single stage.
16	MEMBER SIEBER: They're single stage.
17	MEMBER STETKAR: High clearance.
18	MEMBER BLEY: There's a fair amount of
19	clearance.
20	MEMBER STETKAR: That's right. But still -
21	_
22	MEMBER SIEBER: You get some re-
23	circulation.
24	MEMBER STETKAR: If they're going to fail,
25	it depends on the time
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1	MEMBER SIEBER: Sooner or later they
2	MEMBER STETKAR: Running them for five
3	minutes like that doesn't really
4	MEMBER BLEY: Will be all right.
5	MEMBER SIEBER: They could. I've seen
6	I've actually seen test results where they ran them
7	for 24 hours, a pump I'm aware of.
8	MEMBER STETKAR: I have too, when you take
9	the pump apart, and the power is all pitted and
10	everything. Nobody seemed to notice anything.
11	MR. WOJCHOUSKI: I'll just go ahead and
12	answer your question about the time duration on this.
13	If you're actually doing this, you have operators,
14	it's in the control room. They have initiated these
15	either in the suppression pool cooling or drywell
16	sprays. They have guidance and EOPS that tell them to
17	go ahead and watch for the flow. They're looking for
18	surges. They go ahead and notice that the flow
19	absolutely collapses, goes away. They'll go ahead and
20	turn off the pump. It's not doing anything for them.
21	MEMBER BLEY: Sometimes they do, and
22	sometimes they
23	MEMBER SIEBER: Surges may develop some
24	time after you start the pump, as everything heats up.
25	MR. WOJCHOUSKI: The other thing that we
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1 have within EOPS, like was mentioned earlier by Rich, is there's curves which has the temperature of the 2 3 suppression pool, the pressure of the drywell, and the 4 flow rate of the pumps. So within the procedure 5 there's a guide to the operators to watch those 6 As you get into cavitation, to go ahead and curves. 7 throttle the pumps down, or make sure that there's 8 adequate NPSH. Monticello specific EOPS has a caution 9 in it that says if you're less than 7 PSIG, that pump 10 cavitation may be occurring.

11 Risk assessment. Risk assessment assess 12 the impacts of the plant risk, containment accident 13 pressure is assumed not present during the postulated accident scenarios, such that inadequate low pressure 14 15 ECCS pumps NPSH occurs. The DBA-LOCA risk assessment 16 presents a specifically generic and conservative such 17 that the results are applicable to the BWR fleet. 18 Non-LOCA events are also considered in the analysis in 19 a simplified fashion to try to bound the BWR fleet.

The risk assessment impacts resulting from 21 the example plant for containment over-pressure credit 22 for the DBA LOCA are the delta and core damage frequency is 9 times 10 to the minus 9th per year, and 23 24 the delta large early release frequency was also 25 conservatively assumed to be the same value.

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69 MEMBER BLEY: Alan, I think we need to hear a real detailed explanation of the PRA scenario exactly what the operators are doing, what the equipment does, if the pumps are stopped, when they're restarted, how this can really be that these pumps have no -- that loss of suction on these pumps has no impact on the ability to survive that LOCA. MR. WOJCHOUSKI: We have a presentation, and if we have time, we can go into it. It is a simplified very bounding-type of analysis that goes through and comes up with these --At this level, it sounds MEMBER BLEY: like you don't need these pumps to work to survive. Is that true? MR. WOJCHOUSKI: For the delta CDF this is supposed to be what is the change in core damage frequency if you go ahead and lose --

MEMBER BLEY: Compared to the pumps actually working. So they're somehow working under this condition, and you're giving credit for that, or the operators are doing something to make them work, or you don't need these pumps.

23 MR. WOJCHOUSKI: You have a low 24 probability of all the events that lead up to this 25 condition.

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1	MEMBER BLEY: So it's likely you'll have
2	net positive suction head is what you're telling
3	okay. So the scenario that has not enough pressure
4	to drive these pumps is very low in frequency.
5	MEMBER APOSTOLAKIS: What does DBA-LOCA
6	mean?
7	MR. WOJCHOUSKI: Design-basis LOCA means
8	that it's the recirc guillotine break, which is the
9	largest break that Monticello has, and most BWRs have.
10	Monticello, it's a 28-inch recirc suction line break.
11	MEMBER BLEY: But then unlike the DBA,
12	things can fail.
13	MEMBER APOSTOLAKIS: Unlike?
14	MEMBER BLEY: In the DBA, you have one
15	failure.
16	MEMBER APOSTOLAKIS: Yes.
17	MEMBER BLEY: Here, they're allowing more
18	things to fail. They're just using the same
19	initiating event. I think that's what you're saying.
20	MEMBER APOSTOLAKIS: Is that what it
21	means? You can have multiple failures?
22	MR. WOJCHOUSKI: You have a DBA-LOCA, and
23	then our net positive suction head calculation has one
24	single additional failure that we analyze to for the
25	small
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71 1 MEMBER APOSTOLAKIS: And that single 2 failure is assumed. 3 MR. WOJCHOUSKI: Assumed. 4 MEMBER APOSTOLAKIS: It doesn't have a 5 probability, it's assumed. 6 MR. WOJCHOUSKI: It is assumed, 100 7 percent. 8 MEMBER BLEY: But to get to CDF or LERF, 9 you have to have multiple failures. 10 MEMBER APOSTOLAKIS: Yes, that's what 11 confuses me. 12 MEMBER BLEY: You have to go beyond your 13 design-basis --14 MR. WOJCHOUSKI: Right, to finally get up 15 there. 16 MEMBER APOSTOLAKIS: So if I assume a 17 single failure, but for the LOCA itself, you put the 18 frequency there. 19 MR. WOJCHOUSKI: There's a probability for 20 having a LOCA. 21 MEMBER APOSTOLAKIS: This is a very 22 selected use of PRA. I mean, you put the frequency of 23 the initiator, but not the probability of the single 24 failure. That's assumed to exist. 25 MR. ANDERSEN: No, George. Can I answer? **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	MEMBER APOSTOLAKIS: Yes.
2	MR. ANDERSEN: This is Vince Andersen from
3	Aaron Engineering. Yes, this is the accident sequence
4	itself. These are very isolated accident sequences,
5	and so they are large LOCAs with the containment
6	unisolated, with the likelihood of having these
7	undesirable initial plant states, such as a high pool
8	temperature, high ultimate heat sink temperature.
9	Then assuming that that results in inadequate NPSH for
10	the low pressure pumps, assuming with a probability of
11	one that they go away, assuming then doing a human
12	error probability that they don't throttle the pumps
13	in the scenarios where that would help. So, yes,
14	those issues are all in that answer.
15	MEMBER BLEY: So it's the design-basis now
16	can account
17	MR. ANDERSEN: Yes, direct
18	MEMBER BLEY: things that you're asking
19	for without the conservative assumptions. They're
20	letting things happen as they would probabilistically,
21	rather than saying we'll get the lowest possible
22	pressure and the highest possible temperature.
23	MEMBER APOSTOLAKIS: But this is not a
24	delta CDF, in the standard use of the word.
25	MR. ANDERSEN: Yes, it is.
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1	MEMBER APOSTOLAKIS: Yes, it is?
2	MR. ANDERSEN: Yes, it is. Yes, if you
3	
4	MEMBER BLEY: So the original one is the
5	one what is the original one?
6	MR. ANDERSEN: It's not a delta CDF if you
7	say it already exists in the plant in the PRA model,
8	but these negligible almost sequences don't exist in
9	the model. And assuming that there's a DBA
10	containment over-pressure issue that is really real in
11	the PRA model, then it's we add it to it and
12	there's the delta.
13	MEMBER APOSTOLAKIS: But you say this is
14	the DBA, so you have assumed the existence of a single
15	failure.
16	MR. ANDERSEN: I apply a frequency to it.
17	MEMBER POWERS: It assumes a large LOCA.
18	MEMBER BLEY: The big pipe break is all
19	when they say a DBA-LOCA, they just mean it's not a
20	pipe break. That's all. Right?
21	MEMBER APOSTOLAKIS: Then it goes to a PRA
22	with multiple failures.
23	MR. ANDERSEN: Correct. Yes.
24	MEMBER BLEY: Any kind of failures.
25	MEMBER STETKAR: But only for that
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initiating event. 1 MR. ANDERSEN: Correct. 2 MEMBER STETKAR: What would be the change, 3 4 though, for the more likely contributors to real core 5 damage, those being smaller LOCAs? MR. ANDERSEN: That's -- so the -- this, 6 7 I would say, is on the conservative -- even though 8 people think PRA realistic, there's still conservative 9 elements in the PRA for these sequences, so I can 10 bound the fleet. One of them is, is that the large 11 LOCA in the PRA is any break greater than a 6-inch. 12 diameter hole, and so, obviously, that's a much smaller LOCA than these DBA calcs. 13 MEMBER STETKAR: Transients and small 14 15 LOCAs where the operators blow down to the suppression 16 pool. MR. ANDERSEN: That, if you want to drag 17 18 that into the PRA, it's probably --19 MEMBER STETKAR: Wait a minute. It is in 20 the PRA. 21 MR. ANDERSEN: Yes, it is. 22 MEMBER STETKAR: It better be. 23 MR. ANDERSEN: If you want to drag the DBA 24 aspect to containment over-pressure and that sort of 25 thing into there, that, correct, is about an E to the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	minus 5e to the minus 8 sequence.
2	MEMBER BLEY: Net positive suction head is
3	in the DBA. I mean it's a real issue.
4	MR. ANDERSEN: It is a real issue. Yes,
5	it is a real issue.
6	MEMBER APOSTOLAKIS: I still don't know
7	why you want first of all, aren't we going to have
8	another chance to review these things? I think I was
9	told
10	MEMBER BLEY: We're going to get a report.
11	MEMBER APOSTOLAKIS: We're going to get a
12	report, and maybe have a Subcommittee meeting.
13	VICE CHAIR BONACA: The topical will
14	contain this level of detail, and the description.
15	MEMBER BLEY: Not just results?
16	MEMBER ABDEL-KHALIK: I think the purpose
17	of this presentation, to a large extent, is to get
18	feedback from the Committee as to where the questions
19	are going to be, so that when we have the opportunity
20	to review the topical report, and hear a full
21	presentation, they will address these issues.
22	MEMBER APOSTOLAKIS: I'm still a bit
23	confused as to what 1.174 is doing here. 1.174,
24	suppose you having a licensing basis. You want to
25	change something. You see whether the limits are met.
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1	Here, we're not changing anything.
2	MEMBER SIEBER: Changing the calculation.
3	MEMBER APOSTOLAKIS: Trying to dismiss
4	something.
5	MEMBER STETKAR: I mean, you could argue.
6	MEMBER APOSTOLAKIS: Well
7	MEMBER STETKAR: But 1.174 is supposed to
8	apply to total CDF, not delta CDF from one accident
9	scenario.
10	MEMBER APOSTOLAKIS: That's very true.
11	But, also, it's supposed to apply to proposed changes
12	in the licensing basis. What is the proposed change
13	in the licensing basis here?
14	MEMBER BLEY: Well, the previous the
15	Reg Guide, as I understand it, says you have to have
16	net positive suction head without taking credit for
17	any over-pressure in the containment. The change is
18	they're going to let them take credit for the pressure
19	in the containment. The Reg Guide in the conservative
20	way in these PRA calcs are trying to say in a
21	realistic way.
22	MEMBER STETKAR: It changed the licensing
23	basis. It's not a change to a plant.
24	(Simultaneous speech.)
25	MR. LOBEL: This is Richard Lobel of the
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1 Let me just clarify. I think you got it staff. 2 This topical report would be invoked by a right. 3 licensee who came in with a license amendment request 4 to somehow change their licensing basis in a way where 5 they thought they needed credit for containment accident pressure for net positive suction head. 6 It 7 could be a power uprate, it could be a change to a 8 heat exchanger, it could be all kinds of things, but 9 it would be, most likely, from a licensee for a 10 license amendment request, so it would be a change to the license. 11 12 MEMBER BLEY: And the Reg Guide will tell 13 how to do this calculation conservatively. Will it 14 deal with the kind of things we've been hearing about, 15 the simulation calculations and things like that, or would that be left up to the licensee to --16 17 MR. LOBEL: You mean SuperHex? Are we 18 back to SuperHex? No. 19 MEMBER BLEY: Yes, the 95-95 --20 MR. LOBEL: Oh, that, yes. The statistical 21 part of it is really what this topical report is 22 about. 23 MEMBER BLEY: Okay. 24 MR. LOBEL: SuperHex is not part of what 25 this topical report is about. Okay. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

MR. WOJCHOUSKI: Moving on, page by page. Example plant analysis. Monticello specific plant data was provided to General Electric for the NPSH analysis. Five years of plant data on 80 input parameters and probabilities distributions for each parameter was provided.

7 The analysis was done for DBA-LOCA and was 8 completed with three different scenarios. One is a 9 short term, which is less than 600 seconds. The 600 10 seconds is a 10-minute operator no action time. We 11 used a single liming failure for NPSH considerations. 12 For Monticello, that happens to be failure of LPCI 13 loop select. Monticello has LPCI loop select logic. This will assume that it picks the wrong loop, and all 14 15 your flow is going not to the vessel or core, it is 16 going out of the break into you drywell.

We assume that all pumps are at run out, so we have four RHR pumps. They're putting over 17,000 gallons of water into our drywell, which is essentially spraying down the drywell, so that will minimize your containment pressure. That's why that was picked as a single limiting failure for the short term.

The long term analysis is greater than the 600 seconds. This is where you can credit operator

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action has already taken place. The limiting single 1 2 failure for Monticello is a loss of diesel generator. Assume that you already have a loss of off-site power 3 4 for the DBA-LOCA, we also come in and we remove one of our diesel generators. What Monticello is left with 5 is one division of RHR, and one division of core spray 6 7 which entails one core spray pump and two RHR pumps. At 600 seconds, they take one of the RHR pumps and 8 turn it off, put on RHR service water so that you have 9 cooling water to the heat exchanger. The other RHR 10 pump is taken away from injecting in the vessel and 11 12 put in suppression pool cooling, so you have core 13 spray that's maintaining your vessel level, and you have suppression pool cooling going on at that time. 14 15 The inputs are selected for NPSH to minimize over-16 and to maximize your containment, pressure, or 17 suppression pool temperature. 18 MEMBER MAYNARD: Did you look at were

19 there any scenarios where if the operators took action 20 within the first 10 minutes, that it was worse for the 21 NPSH, or do you have procedures that flat require your 22 operators to not take any action for 10 minutes? 23 MR. WOJCHOUSKI: We -- operator action before 10 minutes in realistic time, they can go do 24 25 This is an analytical version in which 10 minutes it.

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80 you can't credit for. For the pumps for NPSH, if operator action is done before the 10 minutes, the pumps are at run out. What they do is they would throttle those back, throttle them back; therefore, you would need less NPSHr, and have more NPSH available, so that would --And I believe that for MEMBER MAYNARD: most of the things that I can think about. I'm just really asking did you take a review in the first 10 minutes, is there a scenario that if they did take certain actions within their procedures, that it created being less than --MR. WOJCHOUSKI: Through our design-basis, when we first set all this stuff up, we looked for

15 that sort of stuff to find the limiting stuff, did not 16 find anything that if operator action happened before 17 the 10 minutes, that would make it more severe than 18 we've already assumed.

MEMBER MAYNARD: But at 10 minutes you did assume that they were guaranteed to switch over the RHR train, and RHR service water to suppression pool cooling.

MR. WOJCHOUSKI: Correct.

MEMBER MAYNARD: Okay.

MEMBER ABDEL-KHALIK: I think we're

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running way behind, so please go ahead. 1 The last scenario was 2 MR. WOJCHOUSKI: containment over-pressure failure. That scenario was 3 done specifically for this topical report to address 4 5 the concern what happens if you lose containment overpressure, and you only -- that is your single only 6 7 In actuality, you'd need two active failure. 8 In order to get there, you'd have to have failures. 9 two containment isolation valves fail, or you'd have to have the containment breach which is a passive 10 11 breach. We selected the porous air space breach in 12 13 order to make sure that any of the energy released out of the reactor vessel is washed into the TOROS, and 14 15 actually by doing that we're scrubbing that release, 16 and you're maximizing the suppression pool If you had assumed that the breach of 17 temperature. containment was in the drywell, all the energy is 18 19 heading out the drywell, the suppression pool won't 20 see the increased temperature, so it's conservative 21 for the NPSH to assume where that break is, so it's a smart loss of containment. 22 23 All these three scenarios were done two ways, one was the deterministic approach, and the 24

25 second one was the statistical Monte Carlo approach.

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2	The first slide have some of the results.
3	What this shows you is the top line, number 4, to be
4	deterministic method. This is a comparison of the
5	suppression pool temperatures for the short term DBA-
6	LOCA, and we have LPCI loop select failure included in
7	here.
8	What I would like you to take away from
9	here is that you see that the deterministic is
10	bounding over all the statistical. We provided three
11	different lines. One happens to be the maximum, the
12	mean, and the minimum results out of suppression pool
13	temperature from the 59 different cases.
14	MEMBER ABDEL-KHALIK: Do you mean maximum,
15	or do you mean okay, you mean the maximum. Right.
16	MR. WOJCHOUSKI: Maximum.
17	MEMBER CORRADINI: Not 95-95, but of the
18	59 calculations, that's the big one.
19	MR. WOJCHOUSKI: That's the big one.
20	MEMBER CORRADINI: Okay.
21	MR. WOJCHOUSKI: Then we come along, and
22	if you also notice that seeing how this is only out to
23	the first 10 minutes, that all these values are
24	relatively close together, whether it's the
25	deterministic or the minimum statistical. There's
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approximately 20 degrees difference between them. 1 2 Now we move over in suppression pool long term. You'll also see, again, that the deterministic, 3 4 which is line 4, is bounding. It's high above 5 Then you have the statistical everything else. 6 maximum mean, and a minimum, again, on these. If vou look in-between the statistical maximum and the 7 deterministic maximum right at the one point, you have 8 9 approximately 20 degrees just in-between those two, so 10 it's spreading out. 11 This is the RHR pressure required for adequate NPSH short term. This is a busy curve, but it 12 13 shows you a lot. 14 MEMBER CORRADINI: So I just wanted to 15 understand, you don't have to go back. So you pick 16 this up, the second slide you showed, you're picking up at the time when you switch to diesel generator 17 failure, and so this just paces where you were to 18 19 longer times with failure? 20 WOJCHOUSKI: What you do is MR. one scenario in the short term for the first 600 seconds. 21 22 MEMBER CORRADINI: Right. 23 MR. WOJCHOUSKI: And that's its own 24 For the long term, you go ahead and have analysis. 25 the same diesel failure for the first 600 seconds that NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1	is not bound for NPSH, so you don't use it.
2	MEMBER CORRADINI: Right.
3	MR. WOJCHOUSKI: And then you continue on
4	with the same scenario with one diesel failure from
5	600 on, because that becomes the bounding
6	MEMBER CORRADINI: Okay. Thank you.
7	MR. WOJCHOUSKI: So it's just
8	MEMBER CORRADINI: Right.
9	MR. WOJCHOUSKI: The dotted line across
10	here happens to be 14.26, which we use in Monticello
11	for our atmospheric pressure. It's the lowest we've
12	had weekly average, as well as monthly average. The
13	next one happens to be, the square happens to be the
14	deterministic pressure required for NPSHa to equal
15	NPSHr. You notice at the very beginning when there's
16	plenty of available space that this is actually a
17	negative number. You're actually pulling a vacuum
18	over here. But it shows that deterministically
19	towards the end of the 10 minutes is that you'll need
20	a little bit of over-pressure. Statistically, it
21	shows that it's much lower, and barely need anything
22	at the 10-minute mark.
23	The red line up here is a wetwell over-
24	pressure deterministically. So from that one
25	calculation deterministically, this is what SuperHex
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1 calculated as what the over-pressure is available to A point to bring out is, I showed this to you, 2 you. some of the people from TVA, and they said where did 3 your pressure go? It drops off like a rock. I told 4 5 them LPCI loop select, I have 17,000 gallons washing, spraying down the TOROS, and that's the reason why --6 7 or the drywell, that's the reason why the pressure is 8 dropping. Because of the pool 9 MEMBER CORRADINI: 10 height. Spraying it straight 11 MR. WOJCHOUSKI: down. 12 13 MEMBER CORRADINI: I want to compare 14 apples to apples. So you want me to -- one which 15 should compare the red line to the squares. 16 MR. WOJCHOUSKI: To the squares, that's 17 correct. 18 MEMBER CORRADINI: Okay. Thank you. 19 MR. WOJCHOUSKI: Those are deterministic, 20 they go together. 21 MEMBER CORRADINI: Thank you. 22 MR. WOJCHOUSKI: The triangle line goes with the three lines above it. One is the maximum, one 23 is the minimum, and the last one happens to be the 24 25 mean of the statistical analysis. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

86 Another busy slide. This happens to be 1 2 the long term. 3 So one thing I guess MEMBER CORRADINI: 4 I'm curious about, let me just tell you what I see, 5 and you tell me if it's wrong. So if I take the red with the squares, that delta is 2-1/2 psi 3. If I 6 take the blue diamonds with the triangles, it's 3. 7 8 It's not that much different. MR. WOJCHOUSKI: This is the short term. 9 10 There really isn't a lot of difference between them. 11 MEMBER CORRADINI: Okay. 12 MR. WOJCHOUSKI: When you see the real 13 difference, happens to be the next slide, which was 14 just put up, which is the long term. Here you'll go 15 ahead and see that the squares happen to be 16 deterministic wetwell pressure required. You're up at about 20 pounds, about 6 pounds of over-pressure that 17 18 it says at your peak suppression pool temperature that If you go ahead and look at that 19 you need. 20 statistically, that comes down to approximately a 21 and a half, in that range, so there's pound 22 substantial reduction if you do it statistically more 23 realistic methods. 24 The other thing is, yes, you take this red 25 line which happens to be the wetwell pressure NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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deterministic, that goes right along with you square 1 2 box line. The other thing to go ahead and observe is that at this point on the triangles from statistically 3 4 at its peak, it is actually where you need the wetwell 5 pressure is where your suppression pool temperature is 6 the highest. This is how your suppression pool 7 temperature and the pressure, wetwell pressure tend to 8 go in step. The higher temperature you have, the 9 pressure also drives with it. The corresponding lines that you should be looking at isn't the minimum 10 wetwell pressure statistically. It would be more in-11 between the maximum to the mean. 12 13 MEMBER ABDEL-KHALIK: Why is that? 14 MEMBER CORRADINI: Before you explain 15 that, I was going to interpret these curves to mean 16 the difference -- can you go back one, since the other one is easy, let's start there for interpretation. 17 18 Right, that one. So I'm supposed to I'm sorry. 19 compare the red to the squares. 20 MR. WOJCHOUSKI: That's correct. MEMBER CORRADINI: And the blue diamonds 21 to the triangles. Well, let's stick with the red with 22 23 the squares. 24 MR. WOJCHOUSKI: Right. 25 MEMBER CORRADINI: That's the margin. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	MR. WOJCHOUSKI: That's the margin.
2	MEMBER CORRADINI: Okay. And so what I
3	said here, I still think is I thought maybe is
4	close to right, which is the margin is not that much
5	different whether I look at a deterministic method to
6	estimate the margin, and a statistical method to
7	estimate the margin. And then you came back with the
8	next curve to say I shouldn't look at the minimum, I
9	should look at something else. And I guess I don't
10	understand that part.
11	PARTICIPANT: Short term versus long term.
12	MEMBER CORRADINI: Well, no, but it's
13	still the
14	(Simultaneous speech.)
15	MEMBER ABDEL-KHALIK: It's the same curves
16	over a different
17	MR. WOJCHOUSKI: This is different time
18	period. So the triangle right here which your will
19	be where your need the most amount of wetwell pressure
20	to go ahead and have NPSHa equals NPSHr.
21	MEMBER CORRADINI: Right.
22	MR. WOJCHOUSKI: Equal those up. Is at a
23	point in which you have the most suppression pool
24	temperature, the highest temperature. As the
25	suppression pool temperature goes up, trends up, it
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1	will drive the pressure along with it. So instead of
2	comparing 59 runs to the minimum, the blue line is the
3	minimum wetwell pressure, you would tend to line that
4	up closer to the max, to the mean.
5	MEMBER CORRADINI: I had a feeling you
6	guys were going to go there. So what you're telling
7	me is, because I have a hot pool, I'll take credit for
8	that in the over-pressure, the vapor pressure in the
9	wetwell space.
10	MR. WOJCHOUSKI: If you're trying to line
11	up exactly which case hit it.
12	MEMBER CORRADINI: Got it. Right. Now I
13	see what you're saying. Thank you.
14	MR. WOJCHOUSKI: Does that make some
15	sense?
16	MEMBER CORRADINI: It makes sense. I'm
17	not sure if I would do it that way, but it makes
18	sense, what you're saying.
19	CHAIRMAN SHACK: Why is the containment
20	pressure for the deterministic calculation I
21	thought it was going to be lower than the statistical
22	one.
23	MR. WOJCHOUSKI: This runs into Hww, and
24	I'll let Fran go ahead and kind of
25	MR. BOLGER: This is Fran Bolger with GE.
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1	It's actually expected that the statistically, you
2	will drive a lower pressure. Considering that you're
3	talking about lower temperatures in the pool, that
4	will drive lower pressures in the containment.
5	CHAIRMAN SHACK: Okay.
6	MR. WOJCHOUSKI: This is the results of
7	the long-term analysis. That shows deterministic and
8	statistical, and the pressure of the wetwell
9	deterministically, and statistically, so with the max.
10	MEMBER ARMIJO: From that curve could you
11	tell me what the margin you have is? I'm back where
12	Mike
13	MR. BOLGER: This is Fran Bolger. Could
14	you put up the curve with the Hww? It may not be on
15	this presentation. It's still an open session slide,
16	so I think if you've got it there.
17	MEMBER ARMIJO: I think you can answer my
18	question by telling me which curve do I compare
19	MEMBER CORRADINI: Do they propose we
20	compare.
21	MEMBER ARMIJO: Yes. I'm catching up with
22	Mike.
23	MR. WOJCHOUSKI: For?
24	MEMBER ARMIJO: That didn't help.
25	(Off mic comments.)
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1	MEMBER ARMIJO: I think I know what to
2	compare, but I'm not sure.
3	MR. WOJCHOUSKI: For the square, which is
4	the deterministic you go up to the red line.
5	MEMBER ARMIJO: So the delta between that
6	and any point along this time line is your margin.
7	MR. WOJCHOUSKI: Let's go ahead and just
8	take the peak.
9	MEMBER ARMIJO: Okay.
10	MR. WOJCHOUSKI: Right here at that time
11	frame will be the suppression pool peak temperature
12	will occur there. It will also show you that this is
13	where you need the most containment over-pressure to
14	have NPSHa equal NPSHr.
15	MEMBER ARMIJO: Right.
16	MR. WOJCHOUSKI: What you've got is, this
17	is what you need. Right here is what you have
18	deterministically.
19	MEMBER CORRADINI: So can I inquire about
20	that have? So in the red have, what temperature are
21	you using to compute the partial pressure of water
22	vapor in the wetwell? You're not using the
23	suppression pool temperature; otherwise, you'd have a
24	bigger have. What are you using to compute the total
25	pressure there, because you have the highest - if I
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1 understood the way you went through the argument prior 2 in the words, you're working your best to get the 3 highest suppression pool temperature, which creates 4 the biggest negative for H vapor pressure. And then you compute due to whatever the inventory is, and 5 6 whatever the flows are, what the driving pressure is, 7 which is the pool height, minus the loss. So what are 8 you using for the wetwell temperature of the ambient 9 for that red squares? 10 MR. WOJCHOUSKI: What we have right here, 11 I'll just go ahead and take the one max. 12 MEMBER CORRADINI: Yes. 13 MR. WOJCHOUSKI: We get -- the GE code you 14 get, at that point you get the peak suppression pool 15 temperature, you have that. You go ahead and use that 16 to calculate your vapor pressure at that one time 17 step. 18 MEMBER CORRADINI: Yes. 19 MR. WOJCHOUSKI: Just that one time step. 20 You also get what the calculation what the wetwell 21 pressure is. The code goes ahead and gives that to 22 you at that time step. 23 MEMBER CORRADINI: But when you compute 24 that wetwell pressure, you allowing the are 25 equilibrium between the pool and the ambient, or are NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	you biasing the ambient to a temperature such that
2	your pressure there is a bit lower? That was your
3	what I thought I heard as an explanation, in the
4	deterministic one, which is everything is logically
5	connected. I'm just curious of what the temperature
6	is of the wetwell ambient for the red.
7	MR. WOJCHOUSKI: For the red, I believe
8	they're in thermal equilibrium, such that you have
9	your TOROS water temperature, and your TOROS air space
10	temperature is what you're asking.
11	MEMBER CORRADINI: Yes.
12	MR. BOLGER: This is Fran Bolger. What's
13	the relationship between the pool temperature and air
14	space in the wetwell?
15	MEMBER CORRADINI: Right. Because, I mean,
16	all we're doing here is the laws of gases. Right?
17	The red square is the air pressure at some temperature
18	plus the vapor pressure at some temperature, minus the
19	suppression pool temperature computed to a pressure.
20	So I'm trying to figure out what your temperatures are
21	in the calculation, so I can understand.
22	MR. BOLGER: Well, the temperatures are
23	the temperature of the pool, and the pressures are as
24	calculated by SuperHex. And those pressures are
25	calculated with a mechanistic model between the pool
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1	surface and the air space.
2	MEMBER CORRADINI: In both statistical,
3	and deterministic.
4	MR. BOLGER: Yes. This one is a difficult
5	one to visualize margin, but if you calculate Hww as
6	a function of time, then you could look at those terms
7	in combination with each other, and look at relative
8	margin in combination to see really how they compare
9	to each other.
10	MEMBER CORRADINI: So let me ask you
11	I'll stop at this point, and we can talk privately.
12	But what's bothering me is, and maybe it's in there
13	somewhere, is take the red square to the blue square,
14	I get some delta.
15	MR. BOLGER: Yes.
16	MEMBER CORRADINI: If that's consistent,
17	then I would expect that to map into one of your
18	margin calculations statistically. And what I heard
19	you say was, I ought to compare the blue triangle to
20	the green, or somewhere between the green and the -
21	whatever the hell the color is of the mean. And that
22	gives me pause, unless I understand that I'm comparing
23	apples to apples, which is air temperatures and water
24	temperatures under the same conditions. Do you see
25	why I'm
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1	MR. BOLGER: But to some extent this is
2	you can't really see an apples to apples on the
3	statistical in this chart. What you're seeing for the
4	deterministic is, indeed, an apples to apples
5	comparison.
6	MEMBER CORRADINI: Okay. Thank you.
7	That's fair.
8	CHAIRMAN SHACK: We would see something
9	different if we plotted one of the 59 runs and we
10	looked at the pressures, and the temperatures. That's
11	what's confusing our minds here, because we're
12	grabbing samples from different runs and pasting them
13	together here.
14	MEMBER ARMIJO: It seems like your margin
15	is decreasing in the statistical approach.
16	MEMBER CORRADINI: Well, their argument
17	
18	MEMBER ARMIJO: And I would think it would
19	go the other way.
20	MEMBER CORRADINI: But their argument
21	there is we're naturally doing that. I still think I
22	want to naturally do that to give myself good
23	feelings. But they're saying the blue on the
24	statistical is wrong, because that one tends to under-
25	predict, or not under-predict, to use a air
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1	temperature which is lower and not coupled to the
2	suppression pool temperature.
3	MEMBER ARMIJO: Okay.
4	MEMBER CORRADINI: As I heard your
5	explanation.
6	MEMBER ARMIJO: Okay. Well, maybe this is
7	the wrong time to try and do this.
8	MR. BLUNT: What we're trying to do on
9	this one is that even with the statistical pressure,
10	with that bottom triangular solid curve is that
11	there's very little over-pressure that's needed. And
12	then there's still margin even if you use
13	engineering in feasible curve, like the blue curve,
14	that is intuitively backwards, so that you should even
15	even with that, there's still margin there.
16	MEMBER ARMIJO: Right. But it isn't 4 psi.
17	It's 1 psi.
18	MR. BLUNT: Right. But it's not trying to
19	measure apples and oranges. It's what it's doing.
20	MEMBER ARMIJO: It doesn't make physical
21	sense, but there's margin.
22	MR. BLUNT: Correct.
23	MEMBER ABDEL-KHALIK: I think it would be
24	very helpful if we plot the margin as a function of
25	time for both the upper bound and lower bound and
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1	mean.
2	MR. BLUNT: There are other proprietary
3	curves that will be in the LTR.
4	MR. BOLGER: We have another chart that
5	you can see the margin, if you want to see that maybe
6	in later
7	MEMBER ABDEL-KHALIK: In closed session.
8	Yes, I'd like to see it. Thank you.
9	MEMBER CORRADINI: Sorry to delay, but
10	CHAIRMAN SHACK: It seems to me, one of
11	the take aways here is that you still, in fact, need
12	containment over-pressure.
13	MR. BLUNT: Correct.
14	CHAIRMAN SHACK: The statistics didn't get
15	you all the way there. It bought you something, but
16	you didn't get there, which I think you were hoping,
17	presumably, to do.
18	MR. WOJCHOUSKI: It would be nice, but we
19	won't guarantee it. On the next slide, happens to be
20	the containment, loss of containment. What this shows
21	is that your temperature for deterministically also
22	is, again, bounding. You have your three temperatures
23	for the mean, and the max, and the minimum.
24	What we also did was the over-pressure
25	required. We showed that deterministically you would
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1	need containment over-pressure for this particular
2	example, but statistically you would not.
3	MEMBER CORRADINI: So this is the one
4	where it falls well with all systems available.
5	MR. WOJCHOUSKI: All systems available,
6	statistically we underneath it. You don't need
7	containment over-pressure. You actually have
8	negative. So that's the one particular one in which
9	we did, to answer your question, are they coupled?
10	And this particular case, the only failure that you're
11	assuming is loss of containment integrity, and you
12	have all your ECCS available, and all your pumps.
13	There's adequate cooling to make sure that you don't
14	need it, so that's what the message is on this
15	particular slide.
16	Special events. NPSH methodology for
17	special events is presented in the topical report, a
18	brief discussion of each of the special events are
19	entailed. Similarities and contrasts between the DBA-
20	LOCA and how we do the stuff, and identify
21	conservatisms in each in the special event NPSH
22	evaluation are described.
23	The NPSHa determinations will be completed
24	on a plant-specific basis, expected that the
25	determination approach utilizing nominal input values
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1	will be used to calculate the NPSHa for special
2	events. That approach show that their NPSH available
3	is less than NPSH required, but a statistical approach
4	utilizing the mean output values will be used to show
5	the expected realistic response to the event.
6	VICE CHAIR BONACA: When are you planning
7	to submit the licensing report?
8	MR. WOJCHOUSKI: We have a topical that
9	should be submitted next week.
10	VICE CHAIR BONACA: Okay.
11	MR. WOJCHOUSKI: We just had a BWR Owner's
12	Group meeting with
13	MR. BLUNT: Yes. We just approval of the
14	version that we had that all these slides are
15	presented and made upon. We will probably caucus and
16	see if that is still acceptable to submit based on the
17	feedback we got from today. Right now we do have a
18	topical that was ready to be submitted next week.
19	We'll make sure that your comments and the feedback
20	from today is consistent with that. If it is, then
21	we'll go ahead and submit it.
22	VICE CHAIR BONACA: Good.
23	MR. BLUNT: I don't want to commit to
24	something based on not knowing.
25	CHAIRMAN SHACK: Now let me just get this
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1	straight in my head again. Now for a special event,
2	because it's a special event, I'm allowed to do a sort
3	of realistic calculation, which is why I do a nominal
4	input value. And if I don't do that, then I do the
5	statistical mean.
6	MEMBER CORRADINI: Nominal meaning systems
7	available?
8	MR. WOJCHOUSKI: Nominal meaning instead
9	of putting everything at the tech spec values,
10	maximize, you can go ahead and take some of them and
11	relax them, as long as they're still conservative.
12	MEMBER CORRADINI: But with just to
13	help me with Bill's question, with all systems
14	available?
15	MR. WOJCHOUSKI: You still have to go
16	ahead and have a scenario development for each one of
17	the special events. You have to define which
18	equipment is available for you, and which is not, and
19	it's based on the different special events.
20	MEMBER CORRADINI: Oh, okay. Okay.
21	CHAIRMAN SHACK: But he's got a set of
22	stuff, and where he goes with nominal, versus
23	MEMBER MAYNARD: It's more of a realistic
24	expectation of what would occur, as opposed to
25	MR. WOJCHOUSKI: And, typically, what
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1	utilities will do is there's one or two values that
2	they'll change to nominal, and still use the licensing
3	basis on all the rest of them.
4	You wind up CDF and large early release
5	frequency due to crediting containment over-pressure
6	which is categorized as very small. And if the
7	containment integrity is not available, ECCS can
8	realistically perform its intended safety function.
9	MEMBER ABDEL-KHALIK: Thank you.
10	MEMBER MAYNARD: Just for my
11	clarification. Currently, without this, each plant is
12	having to do this on a plant-by-plant, plant-specific
13	basis, if needed, with the NRC.
14	MR. WOJCHOUSKI: We've come up with a
15	license amendment, submitted on it, show my
16	calculations, asked for how much over-credit we need,
17	and they review it and approve it.
18	MEMBER MAYNARD: And is the typical method
19	used now for those who need and seek the containment
20	over-pressure credit, is it primarily the
21	deterministic method?
22	MR. WOJCHOUSKI: Exactly.
23	MEMBER MAYNARD: Okay. So this would
24	allow the statistical approach, and it would be a
25	generic; that would be any of the BWR plants coming in
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1	could use this as a basis for their plant-specific
2	submittal.
3	MR. WOJCHOUSKI: Correct.
4	MR. BLUNT: But the submittal would still
5	be based on deterministic. Statistical would be
6	backup information to support the approval of
7	deterministic.
8	MEMBER MAYNARD: Oh, okay. So they would
9	still be doing a they would still be providing the
10	deterministic analysis. Okay. All right.
11	CHAIRMAN SHACK: So we could have a case
12	where you come in, and in the deterministic you ask
13	for the net pressure credit, and your statistical
14	analysis will show you don't need.
15	MR. BLUNT: Or need very little.
16	CHAIRMAN SHACK: It could show that
17	potentially, yes. You need a lot less than you're
18	asking.
19	MR. BLUNT: Correct.
20	MEMBER POWERS: I don't understand how
21	this statistical analysis can be of any generic
22	utility whatsoever, because the distributions are all
23	peculiar to each plant environment.
24	MR. WOJCHOUSKI: The statistical analysis
25	has to be done uniquely for each utility that's going
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1	in and asking for the credit.
2	MEMBER POWERS: Yes, you have to do the
3	calculation for your plant.
4	MR. BLUNT: The methodology that says here
5	are the input parameters that you need to get your
6	data from your plant sites. Here's the way to run the
7	59 scenarios. Here's how to present it in plots and
8	compare it to your deterministic would be the generic
9	application of the methodology.
10	VICE CHAIR BONACA: It's just the most
11	threshold margin for the plant-specific.
12	MR. WOJCHOUSKI: All we're trying to do on
13	this is, the question is how much margin do you have,
14	because if you it deterministically, you need all this
15	containment over-pressure. What do you think you
16	really need, the statistical method will try to answer
17	that question. This is what we really think, and
18	here's how much margin. This is what the difference
19	between those two are. And it's just to give guidance
20	on what the capability of the plant is.
21	MEMBER ABDEL-KHALIK: At this time, I'd
22	like to just go around and see if members would like
23	to provide specific input that would be helpful to you
24	in either modifying your topical report, or preparing
25	for the presentation to defend that topical report.
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1	Jack?
2	MEMBER SIEBER: I don't have any comments
3	for modification.
4	MEMBER ARMIJO: Yes, I don't know if the
5	topical report will have proprietary information in
6	it. Will it? It will, so there's stuff that we're
7	going to see later that would be in the report?
8	MR. BLUNT: Yes.
9	MEMBER ARMIJO: I think this issue of
10	correlation of input variables in the statistic
11	analysis has to be made more clear. I don't really
12	understand how it works, whether in a statistical
13	analysis where you have two things that are dependent
14	on one another, can they possibly be going in opposite
15	directions? So I think you've got to sort that out,
16	and I would somewhere along the line like to see what
17	a good margin curve on temperatures, and pressures,
18	and whatever it is for short-term and long-term.
19	MEMBER SIEBER: You're going to have a lot
20	of margin curves.
21	MEMBER ARMIJO: Well, see, I don't I
22	really don't understand the margins from the curves
23	presented so far, except for the deterministic. I
24	think I understand what you presented.
25	CHAIRMAN SHACK: As unrealistic as it is,
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it's understandable.

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MEMBER ARMIJO: Yes, I understand unrealism.

MEMBER ABDEL-KHALIK: Sam, you're done? MEMBER ARMIJO: That's it. Thank you. MEMBER ABDEL-KHALIK: Dana?

7 MEMBER POWERS: The Monte Carlo analysis 8 is completely inadequately described, that you have to 9 address the issue of not only what the underlying distributions are, but what the correlations are. 10 11 Then having said well, I've got a 95-95, you need to 12 describe what the uncertainty bounds are on those 13 values that you extract out of that. And I can only 14 emphasize again that the underlying distributions have 15 to be stoutly defined, and they have to begin by 16 saying why do I think I have finite variance 17 distributions on these things.

18 MR. WOJCHOUSKI: Could you repeat that19 last one, underlying distributions?

20 MEMBER POWERS: Why you think you have 21 finite -- as George Apostolakis says, when in doubt, 22 use a log normal distribution. Well, that's a 23 distribution with a finite variance, why not use a 24 Levy distribution? I mean, there has to be some 25 defense for the distribution, and if you're going to

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1	base them on experimental data, then you've got to do
2	something about showing that outliers don't exist, and
3	that the data encompasses some realism to it. There's
4	a lot to do on the statistical distribution.
5	Philosophically, I still think one has to
6	approach these with great trepidation, because it is
7	very much a part of the defense-in-depth that we're
8	dealing with here. And as ardent structuralist, I
9	grow nervous when PRA is used to attack defense-in-
10	depth.
11	In any event, if you're going to use PRA,
12	it has to be a fairly comprehensive PRA, it has to
13	certainly include other things besides internal
14	initiators.
15	MEMBER ABDEL-KHALIK: Mario?
16	VICE CHAIR BONACA: Well, I think that the
17	concept here is a good concept to present to us what
18	margin is available. That's really the fundamental
19	issue, and the approach you're taking of still
20	sticking with the your design-basis evaluation, and
21	then presenting this as quantifying margin is the
22	right thing to do. I agree totally with Dana that the
23	statistical approach has to be supportable, and there
24	are these open issues that we raised today, so I would
25	expect you will go back and provide us with responses

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1	to those questions.
2	One last note I'd like to make regarding
3	the presentation of data, some of the page 22 is
4	somewhat confusing, and it took a while of discussion
5	to compare apples and apples. And in some cases, we
6	had apples and oranges are the same figure, so I would
7	just pay some attention to that presentation of
8	results.
9	MEMBER ABDEL-KHALIK: Okay.
10	CHAIRMAN SHACK: Again, I think the most
11	critical issue is this correlation issue that Sam
12	mentioned. I'm not sure you're going to be able to
13	address all of Dana's issues, but you're certainly
14	going to have to show the sensitivity to your choices
15	of distributions at the very minimum.
16	The other one I think is this notion that
17	I think you've addressed model uncertainty by using a
18	conservative model, but I think you're going to have
19	to make that argument a whole lot better than it was
20	made today, if that is, in fact, the case.
21	VICE CHAIR BONACA: Can I add one thing I
22	forgot?
23	CHAIRMAN SHACK: Yes.
24	VICE CHAIR BONACA: I also support the
25	statement of Dana regarding cautiousness about credit.
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We are down a path of accepting credit for back 1 2 pressure, and some of the results we have seen in some of the presentations of specific applications were so 3 4 marginal, and it seems to me that we cannot be 5 cavalier about this issue. I mean, we want to know that your equipment will work under those conditions, 6 7 and the risk doesn't mean that we're accepting 8 We are not accepting failure, in fact, failure. 9 doesn't mean the effectiveness of the systems. 10 MEMBER ABDEL-KHALIK: Thank you. Otto? MEMBER MAYNARD: Well, overall approach 11 and stuff, I believe that the current requirements of 12 13 not allowing any credit for containment over-pressure is overly conservative, so I do think some credit 14 15 should be given. The guestion is how much? I also 16 agree with Dana and Mario that we need to be 17 protective of that margin. I believe that there's 18 margin in both ways, one typically we will pick NPSH 19 required that is conservative, so there's a little bit 20 of defense-in-depth with what's actually available. 21 And then, also, I think we have to make sure that the 22 analyses that are done are conservative, and that we still maintain a margin there. But I have no credit 23 with the methodology that does provide some credit for 24 25 that, I guess the real question is just how much.

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think 1 The other thing Ι in the 2 methodology, and it may be addressed in the topical. 3 We hit on it a couple of times here. It needs to 4 insure that the applicants do take a look at operator 5 actions, and make sure they look to make sure there isn't something that could be done in the first 10 6 7 minutes that you're not taking credit for in the 8 operator action. That could actually make it worse 9 instead of being conservative.

I don't think that will be all that difficult to do, but I do think it's something that needs to be done to make sure we're not just assuming that it's conservative to assume no operator action in the first 10 minutes.

MEMBER ABDEL-KHALIK: Mike?

MEMBER CORRADINI: Most of the stuff has been said. I'll just emphasize two or three things. One is the operator action issue that Otto brought up, I think John had to go somewhere for a minute, but I think this is the thing that he was dwelling on with Dennis. And I think the Owner's Group at least has to consider it, and address it.

In terms of, I guess my impression is --I'm new to this. I'm listening to Mario about this, because with other uprates and other BWR cases, you've

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1	allowed this, so I think we're going from case-by-case
2	to now a policy, and I think to have a policy here to
3	require consistency is good. Therefore, I think we
4	have to proceed with something in this regard.
5	I think Dana's I guess, I was listening
6	to Sam and Dana, and I'd say between the two of them,
7	the point that I guess I asked all the questions about
8	is, I'm still trying to understand what you chose to
9	be the variability going in, and how that variability
10	is expressed in terms of what is the margin. And, so,
11	Dana's point is on the robustness of what you're
12	choosing going in. Mine was still trying to
13	understand what you're comparing to given assuming
14	for the moment that you chose a robust distribution,
15	or a range of conditions. And I think that, at least
16	for understanding how you want to approach it, still
17	is my open question. So I guess I'm going to need to
18	read when we get the details closely about that.
19	Those are the three things.
20	MEMBER ABDEL-KHALIK: Let's go back.
21	Sanjoy?
22	MEMBER BANERJEE: You know, I missed some
23	of the discussion, but what I want to ask you is, are
24	you asking these comments so that you take a final
25	position, or are we
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1	MEMBER ABDEL-KHALIK: No.
2	MEMBER BANERJEE: going to be meeting
3	again, and going through some more detail.
4	MEMBER ABDEL-KHALIK: We're not even
5	writing a letter on this.
6	MEMBER BANERJEE: Okay. So let me give
7	you what I feel right now, without having thought what
8	it's that in some ways it's similar to what we try
9	to do with LOCA in the sense that we were doing a best
10	estimate plus uncertainty, and we developed a
11	methodology to do this over a long period of time,
12	which we call the CSAU methodology.
13	Now that is a very stylized way of doing
14	things to understand what is important phenomena, to
15	look at the uncertainties associated with that, to fix
16	the way you're going to nodalize the problem, and
17	there's a very systematic way of tackling these
18	things.
19	I don't see this being done here. What I
20	see is a bunch of inputs being varied, and some
21	results being presented on this. This is, basically,
22	a long-term cooling problem. If we don't have this,
23	the core is going to be in deep trouble, so I think we
24	need to address it like we address things like LOCA.
25	I wouldn't do it lightly, so I don't see that sort of
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model 1 methodology here, look at where we 2 uncertainties. We understand all sorts of things very clearly. And I'm a little concerned about that. 3 VICE CHAIR BONACA: I think this is -- I 4 agree with you, that you could go further than what is 5 done and develop the model that is more realistic. 6 7 And then we get probably more margin out of it. Ι 8 think what they did, they limited themselves to 9 looking at the margin you get by treating statistical inputs, inputs in a statistical way, rather than 10 11 putting every parameter at the end point of the range, presumably conservative, over-conservative. 12 So I 13 still believe that you can gather some margin this 14 way. Clearly, it's not all the margin you could get, but --15 16 Well, if that's the MEMBER BANERJEE: case, I'm happy. But it has to be done. 17 18 VICE CHAIR BONACA: And the report, of 19 course, has to point that. I believe that's what 20 they've done. 21 MEMBER ABDEL-KHALIK: I think there is one 22 issue that hasn't come up, which is -- okay. Well now 23 you're back. I was -- we're just collecting comments and feedback. And I was wondering if you have any 24 25 feedback to the presenters on issues that they need to **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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113 1 take care of in the topical report before they 2 actually submit it. MEMBER BLEY: I think the main thing from 3 4 my point of view is either in the topical report, or some attachment to it, letting us see the details of 5 the results of recurring analysis have been 6 how 7 What the real physical factored into the PRA, 8 scenarios are through the PRA, and how they were 9 handled is real important for us to look at. So real details on it, not just results. 10 MEMBER STETKAR: I don't have anything to 11 add. 12 13 MEMBER ABDEL-KHALIK: George. I go along with my 14 MEMBER APOSTOLAKIS: 15 colleague. 16 MEMBER ABDEL-KHALIK: Okay. Well, thank Hopefully, you got enough feedback 17 you very much. 18 that would be helpful to you in modifying your topical 19 report, and in preparing for actually presenting it. 20 MR. BLUNT: We do appreciate the 21 opportunity, and I guess one thing we would like to 22 emphasize I think that I've heard a little confusion 23 about is, this topical report is not a submittal of 24 SuperHex code. It's a submittal of a methodology to 25 try to give margin to an existing code that's already **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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114 1 pre-approved, or not pre-approved, but in existence 2 and used throughout the industry. So we did not in 3 this topical report go back and try to explain, or 4 justify some of the items that were in the initial 5 SuperHex items here. That wasn't the intent of the 6 LTR. 7 MR. DENNIG: And the staff understood that 8 as a boundary condition for the work. 9 MEMBER CORRADINI: The only thing I guess 10 I want to emphasize is Sanjoy's point, I think is 11 important for the industry to think through, which is 12 that as much as ECCS stylized Appendix H things were relatively porous early, and then went to other 13 14 approaches, the industry might want to consider the 15 same sort of thing, because you're talking on long-16 term core cooling; therefore, all these sort of issues come back in a different form. 17 18 MEMBER BANERJEE: There are no artificial 19 boundaries to be pushing. This is a serious business, 20 so I think we can open it to whatever length detail of 21 examination we need to satisfy ourselves. 22 MR. BLUNT: You can. You're more than 23 happy, I'll just tell you that -- the topical report 24 didn't include and wasn't based on trying to go back 25 and justify SuperHex.

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1	MEMBER BANERJEE: We weren't looking for
2	justification
3	MEMBER ABDEL-KHALIK: Model uncertainty
4	has come up, and you need to address that. Well,
5	thank you very much. Mr. Chairman, I return it to
6	you.
7	CHAIRMAN SHACK: Thank you again. It's
8	been a very interesting morning. We're ready for a
9	break, I think. I'd say 11:05.
10	(Whereupon, the proceedings went off the
11	record at 10:49:03 a.m.)
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