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2	NUCLEAR	REGULATORY	COMMISSION	
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4	ADVISORY COMMITTE	E ON REACTO	OR SAFEGUARDS (ACRS)	
5		552 <sup>nd</sup> MEETI	NG	
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7		THURSDAY	,	
8		MAY 8, 200	28	
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12	The Advi	sory Commit	tee met at the Nuclea	r
13	Regulatory Commissi	ion, Two	White Flint North	,
14	Room T2B3, 11545 Roc	kville Pike	e, Rockville, Maryland	,
15	at 8:30 a.m., Williar	m J. Shack,	Chairman, presiding.	
16	COMMITTEE MEMBERS PRI	ESENT:		
17	WILLIAM J. SHAG	CK	Chairman	
18	MARIO V. BONACA	Ą	Vice Chairman	
19	SAID ABDEL-KHAI	LIK	Member	
20	GEORGE E. APOS	TOLAKIS	Member	
21	SANJOY BANERJEI	Ξ	Member	
22	DENNIS BLEY		Member	
23	CHARLES BROWN,	JR.	Member	
24	MICHAEL CORRAD	INI	Member	
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1	COMMITTEE MEMBERS PRESENT: (cont'd)
2	OTTO L. MAYNARD Member
3	DANA A. POWERS Member
4	JOHN D. SIEBER Member
5	JOHN STETKAR Member
6	
7	INVITED EXPERTS PRESENT:
8	HAROLD RAY
9	
10	NRC STAFF PRESENT:
11	SAM DURAISWAMY, Designated Federal Official
12	AMY CUBBAGE
13	BRUCE BAVOL
14	TOM TAI
15	MIKE SNODDERLY
16	DENNIS GALVIN
17	RICHARD LEE
18	MIKE SCOTT
19	ALAN KURITZKY
20	ALSO PRESENT:
21	JIM KINSEY
22	GEORGE WATKINS
23	M.D. ALAMGIR
24	WAYNE MARQUINO
25	JESUS DIAZ-QUIROZ
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1	ALSO PRESENT: (0	cont'd)	
2	RICHARD ST.	ATTEL	
3	JAMES BONG	ARRA	
4	BERNARD CL	EMENT	
5	LOUIS CHU		
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5 2 P-R-O-C-E-E-D-I-N-G-S (8:30 a.m.) 3 CHAIRMAN SHACK: The meeting will now come 4 5 to order. This is the first day of the 552nd meeting 6 of the Advisory Committee on Reactor Safeguards. 7 During today's meeting the Committee will consider the 8 selected chapters of the SER associated 9 following: the design certification application, 10 with ESBWR insights from PHEBUS FT Tests, the draft NUREG/CR 11 12 report PRA methods for digital systems, on and preparation of ACRS reports. 13 A portion of the session on ESBWR design 14 certification application may be closed to protect 15 16 information that is proprietary to General Electric-Hitachi and its contractors. 17 18 This meeting is being conducted in 19 accordance with the provisions of the Federal Advisory Committee Act. Mr. Sam Duraiswamy is the Designated 20 21 Federal Official for the initial portion of the meeting. 22 23 We have received no written comments or requests for time to make oral statements from members 24 25 of the public regarding today's session. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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A transcript of portions of the meeting is being kept. It is requested that speakers use one of the microphones, identify themselves, and speak with sufficient clarity and volume so they can be readily heard. I will begin with some items of current interest. Mr. Charles Brown is now an official member of the ACRS, and we'd like to welcome him aboard. He'll bring much-needed expertise in digital systems, and we are looking forward to his participation in our

Mr. Harold Ray is attending the meeting as an invited expert. Subsequent to completion of all necessary paperwork, he will become an official member of the ACRS, and we're happy to have Harold here and look forward to completing that final paperwork to make him an official member.

(Applause.)

Our first item of business today is some selected chapters of the SER associated with the ESBWR design certification application, and Mike Corradini will be leading us through that.

MEMBER CORRADINI: Okay. Thank you, Mr.
 Chairman.

As you all remember, we have now had four

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meetings.

7 1 -- excuse me, five Subcommittee meetings relative to 2 the ESBWR, and most recently two Subcommittee meetings looking at Chapters 4, which is the core design; 6, 3 4 ESFs; 15, in transient analysis. So we're bringing 5 back GEH and the staff here to essentially present a summary of their items relative to those four 6 7 chapters. Oh, I'm sorry, and also Chapter 18, human 8 factors engineering. Excuse me, I forgot one. 9 We'll bring back -- or the staff and GEH 10 will be coming in to talk to us about that in a 11 summary fashion. Most or many of you were at the 12 January and the April Subcommittee meetings. And so with that, I'll just turn it over 13 to Amy Cubbage --14 15 MS. CUBBAGE: Sure. Thank you. MEMBER CORRADINI: -- to kind of give 16 17 people a little bit more information. 18 MS. CUBBAGE: Great. Thank you. 19 This is Amy Cubbage, Lead Project Manager 20 for ESBWR design certification. We really appreciate the interactions we have had up to date on these 21 chapters. We think they have been very useful to the 22 staff. We have asked several RAIs resulting from the 23 issues that have been raised by the Committee -- we 24 25 are going to discuss some of those briefly today. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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They are still open items at this time.

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And we also appreciate the Committee's advance guidance on this meeting to direct what you would like to hear. And on that note, most of the presentation will be by GE-Hitachi, to provide additional details on some topics that were addressed at the previous Subcommittee meetings.

8 I'll let Jim Kinsey introduce those 9 topics, and then briefly the staff will give an 10 overview of the status of those chapters, and then 11 we'll move on to Chapter 18.

I understand that this morning some of the GE folks have not quite arrived, and we may switch the order and have the staff go first. But I'll let Jim do an introductory remark.

MR. KINSEY: Thank you. This is Jim 16 17 Kinsey from GE-Hitachi. As Amy mentioned, our purpose 18 this morning was in a couple of specific areas. We 19 wanted to follow up to address some Subcommittee 20 questions from previous sessions related to the 21 containment and some of the components associated with containment. So we focused our presentation around 22 23 three primary areas.

I think in the last Subcommittee session the Subcommittee was interested in the gravity-driven

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cooling system and the potential for gas binding from non-condensables. I think we had a presentation prepared but didn't quite get to that at the end of the agenda. So our intention this morning was to start off with that discussion and present those slides.

We intended, then, to follow up with a discussion of the overall response of the containment to a LOCA event. I know the Subcommittee had a lot of questions around the formulation and management of non-condensable gases, so we've established an updated presentation in that area to make that picture a little more clear.

And then, we'll follow that up with some follow-on information related to the vacuum breakers and how their seating arrangement is established and how their position indication is managed. So those are the three primary areas in the Chapters 6/15/21 arena.

As we get through those three items, then we'll -- again, we'll interact with the staff on that topic. And then, the other item that we have for today is just a brief follow-on discussion around Chapter 18 and the human factors engineering area that you heard a presentation on last month. Basically,

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the three topics related to containment and then the coverage of Chapter 18.

MS. CUBBAGE: Great. Thanks. And we do have the staff ready to go first, and the GE folks are signing in, are in the building and will go right after the staff.

7 MR. BAVOL: Good morning. My name is 8 Bruce Bavol. I'm the Project Manager for ESBWR design 9 certification, Chapters 4 and 15. What I'd like to do 10 is just go over briefly some of the items -- RAIs and 11 topical reports -- that we have been covering since 12 the January Subcommittee meeting.

Since January 2008, RAI status for Chapter 4, we have resolved 14 RAIs and subsequently issued 23 new RAIs associated with topical reports that we have received. And currently the number of open items is 39.

For Chapter 15, additional RAIs resolved since January has been seven. We have initiated 27 new RAIs, again associated with topical report reviews, and currently we have 45 open RAIs.

I wanted to also provide you with a listing here of new topical reports and revisions that are currently under review since January 2008. As you can see, there's six, eight currently under review

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11 1 since January. And with this listing, we propose for 2 a future Subcommittee meeting NEDE-33338, which is the 3 ESBWR feedwater temperature operating domain accident 4 analysis, and, of course, any other topical reports as 5 needed. MEMBER CORRADINI: Can I just ask --6 MR. BAVOL: Yes. 8 MEMBER CORRADINI: -- we have seen a 9 summary of that proposed change -- or not change, but modification to operation I think in December, if I 10 remember correctly, or maybe it was February. 11 MS. CUBBAGE: January, I believe. 12 MEMBER CORRADINI: 13 January. it Was January? Do we now have -- we do have that NEDE 14 15 report, do we not? MR. BAVOL: Yes, we do. 16 MEMBER CORRADINI: Okay. No, I meant the 17 Committee. 18 19 MR. BAVOL: Oh. MS. CUBBAGE: You should. 20 MEMBER CORRADINI: Okay. I thought we 21 22 did. So are you going to talk any more about that, or do you have an idea when you want to have that, or is 23 it open to us to --24 25 MR. BAVOL: Well, it's currently open. Ι **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

12 1 brought Dr. Weidong Wong here, if there was any 2 specific questions. 3 MEMBER CORRADINI: No, that's fine. Ι 4 just wondered --5 MR. BAVOL: Okay. But that is open. that 6 date is open. 7 MS. CUBBAGE: Right. And, Bruce, I will just add that we do have an RAI milestone for issuing 8 9 RAIs to GE-Hitachi, and I believe that's in June, 10 correct, Bruce? MR. BAVOL: June 13th. 11 MS. CUBBAGE: And we've already issued 12 I don't anticipate there will be a 13 some RAIs. significant number of additional RAIs, but we want to 14 15 wait until we get all our RAIs out and get a little further down the road on that topical. So perhaps in 16 17 the fall would be the appropriate time. MEMBER CORRADINI: Okay. Thank you. 18 MR. BAVOL: Okay. With that, I'd like to 19 turn it over to Tom Tai, who is going to go over the 20 status of Chapters 6 and 21. 21 Okay. My name is Tom Tai. 22 MR. TAI: I'm the Chapter PM for Chapters 6 and 21. Since January, 23 we have resolved 54 RAIs. As a matter of fact, this 24 25 slide is a little out of date since a couple of days **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	ago when we prepared it. So right now what you see on
2	the slide is the current open items 37. I think
3	it's already down to 33.
4	On Chapter 21, since January we resolved
5	this says seven, but actually it is 11. So the
6	current open items would be 26. So we are making some
7	progress, slowly but surely.
8	And what we have is the on Chapter 21,
9	since January, we issued four new RAIs based on
10	comments from the Committee, and these are all on
11	Topical Report 33083, which is TRACG model, and we
12	probably will bring back this for the Subcommittee to
13	look at.
14	And which brings us to the two items that
15	we know that we will bring back we will bring back
16	it will be the Chapter 6 containment analysis and
17	the TRACG open items.
18	MEMBER POWERS: That last I mean, you
19	have an RAI here, requested GEH to address non-
20	condensable gases and steam moisture flow in the GDCS
21	lines.
22	MR. TAI: Under Chapter 6.2, yes, we do.
23	MEMBER POWERS: It doesn't tell me very
24	much. I'm trying to understand what it is that they
25	are to address about non-condensable lines and gases.
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14 1 Is this a -- kind of the same thing with -- having a 2 non-condensable gas issue here? 3 MS. CUBBAGE: If I may, we asked -- two 4 issues. One would be non-condensable gases that may 5 be in the line during operation that may be a blockage for flow, and then also an issue was raised by the 6 7 Committee about the potential for steam entering the 8 GDCS line that might impede the injection flow. And GE-Hitachi is planning to do a presentation on that 9 10 topic today. But as far as the staff is concerned, we 11 have not seen the RAI response, and it's an open item. 12 In general, just giving me 13 MEMBER POWERS: a list and say, "I have 37 RAIs," really doesn't give 14 15 me a good understanding of where your troubles are

16 here.

17

MS. CUBBAGE: I can appreciate that.

18 MEMBER POWERS: It would be more useful to 19 say, "Look, in general, we're finding incompleteness, 20 or phenomenologically we're finding this major gap in 21 the analysis." Can you characterize your RAIs in some 22 general term other than the number?

23 MR. TAI: Well, I think GE -- Wayne, you 24 can tell me that -- in the next hour GE is going to go 25 through a quick overview.

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1	MEMBER POWERS: This is why I'm more of a
2	victim of just the ordering of the presentation.
3	MS. CUBBAGE: Perhaps. And also, we tried
4	to really limit the staff's time, because there were
5	some significant topics that the Committee wanted to
6	hear from GE again coming out of the Subcommittee.
7	MEMBER POWERS: But I'm not sure you serve
8	the Committee well by just giving us a number of RAIs.
9	MS. CUBBAGE: Okay.
10	MEMBER POWERS: It would be better to say,
11	"Our RAIs are simply issues of completeness of the
12	record or they're phenomenological"
13	MS. CUBBAGE: I would say there are
14	still
15	MEMBER POWERS: "vulnerabilities in the
16	application."
17	MS. CUBBAGE: There are still some
18	significant technical issues remaining. I don't think
19	there are any fundamental issues that would call into
20	question the viability of the design. There are
21	issues that need to be resolved, though. These are
22	not minor documentation issues at this point.
23	MEMBER POWERS: That's useful. Numbers is
24	not.
25	MS. CUBBAGE: Thank you. And we can
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1	you know, if you want, after GE's presentation, the
2	staff can come up and briefly reiterate some of those
3	issues. I know Mike Snodderly, the Branch Chief of
4	the Containment Branch, could probably summarize
5	briefly his main remaining open issues.
6	MEMBER POWERS: We'd love to have Mike in
7	front of us.
8	(Laughter.)
9	Time to get even.
10	(Laughter.)
11	MEMBER BANERJEE: The previous slide
12	and this goes into the record there is nothing
13	called slot chum flow or angular flow.
14	MEMBER CORRADINI: It was the carriage
15	recognition software.
16	MEMBER BANERJEE: All right.
17	MEMBER POWERS: Sure you have chum flow,
18	right after a boat when you're looking for sharks and
19	things like that.
20	(Laughter.)
21	MEMBER BANERJEE: I hope not in the BWR,
22	though. No sharks.
23	(Laughter.)
24	MS. CUBBAGE: So at this point, would you
25	like us to proceed with GE-Hitachi? Okay.
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1	MEMBER POWERS: Yes, that would be good.
2	MS. CUBBAGE: Thank you.
3	MEMBER CORRADINI: Do you have them here?
4	MS. CUBBAGE: They are here.
5	MEMBER CORRADINI: As they're setting up,
6	let me remind everybody that on the at the
7	April 9th meeting, we went through a detailed
8	presentation of their limiting accident, which was a
9	main steamline break. We then went through vacuum
10	breaker discussion and discussions about the vent
11	fans, or I should say the post-72-hour fan.
12	And we did not have a chance to go through
13	the discussion about non-condensable gas blockage or
14	potentialities of steam backflow, and so we are going
15	to hear what we weren't able to hear that day as part
16	of this set of presentations.
17	MR. WATKINS: Good morning. My name is
18	George Watkins. I'm a Lead Regulatory Affairs
19	Engineer for General Electric-Hitachi. I have primary
20	responsibility for Chapter 6, and a lead over other
21	engineers working on Chapters 15, 16, and 21.
22	Today we have three presentations dealing
23	with Chapter 6, issues. The first one will be on
24	gravity-driven cooling system interaction with steam
25	and non-condensables, and that will be presented by
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M.D. Alamgir. Then, Wayne Marquino will discuss containment pressure response after a LOCA, focusing on non-condensable gases and where they go during the sequence of events.

5 And then, we have Jesus Diaz-Quiroz, who 6 will talk about our vacuum breakers. He will discuss vacuum breaker test program to provide some 7 our 8 assurance on how robust they are and what type of 9 materials they can withstand on their seats and still be leak-tight. And we will discuss the isolation 10 11 logic for the vacuum breaker isolation valve and how 12 that will function and answer any questions in that 13 area.

14 So we'll begin now with M.D., who will 15 present his presentation.

MR. ALAMGIR: Good morning. Thank you for allowing me to present this issue on GDCS interaction of steam with -- steam and non-condensables with the GDCS pool.

I am told I have only 10 or so minutes. 20 I have to rush through some of the slides. Please stop 21 me if there is a fundamental question on phenomena. 22 Ι available during 23 am also the break to answer 24 questions.

Two issues -- as GDCS flows, will steam

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1	impede or prevent its flow into the vessel? And,
2	second, if there is non-condensable from any source,
3	will that degrade the GDCS flow to the vessel?
4	The summary is, if I've got only 30
5	seconds to present, is we have looked at it and it is
6	insignificant.
7	I'll go through the slides
8	MEMBER BANERJEE: Before you go on, what's
9	the size of the pipe again? Remind me.
10	MR. ALAMGIR: We have four divisions,
11	thanks to Jesus, who just confirmed an eight-inch
12	pipe coming out of the GDCS pool. Each division has
13	two lines injection line, six inches each, pipe size.
14	And then, of course, near the vessel there is a
15	venturi with a diameter of three inches.
16	MEMBER BANERJEE: Are there any elbows?
17	MR. ALAMGIR: There are. As we will show
18	in the diagram, there are bends, 90-degree bends,
19	etcetera. And we are addressing those through slopes.
20	MEMBER BANERJEE: If you will give us some
21	basis for your answers.
22	MR. ALAMGIR: In 10 minutes, what I can.
23	All right. So on the first item, the CCFL
24	CCFL, as you all know, stands for counter-current
25	flow-limiting. In operating plants it is very
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important. We found that for ESEWR it is not, beer the water level in the bundle is always above chimney. However, for the GDCS line, the issue if the water starts flowing and steam is rushing meet it, will that cause any binding? One of the important things to realize that the water level is above the GDCS line when CCFL when the GDCS flow starts. So initially the is no competition. There is, however, a period about a few hundred seconds, and the plot will st it, when the GDCS line is uncovered and that's will the question arises, will it imped? From our analysis, we find that there so much condensing capacity in the GDCS flow it almost thrice the amount of condensing capacity is it can condense the steam in the facility. And st is why it kills the steam before it can even st producing any difficulty. MEMBER BANERJEE: How much subcooling there? MR. ALAMGIR: In terms of it's a fac of three condensing capacity. So I would say is 319 K	20
3       chimney.         4       However, for the GDCS line, the issue         5       if the water starts flowing and steam is rushing         6       meet it, will that cause any binding?         7       One of the important things to realize         8       that the water level is above the GDCS line when         9       CCFL when the GDCS flow starts. So initially the         10       is no competition. There is, however, a period         11       about a few hundred seconds, and the plot will a         12       it, when the GDCS line is uncovered and that's will         13       the question arises, will it impede?         14       From our analysis, we find that there         15       so much condensing capacity in the GDCS flow it         16       almost thrice the amount of condensing capacity if         17       it can condense the steam in the facility. And a         18       is why it kills the steam before it can even st         19       producing any difficulty.         20       MEMBER BANERJEE: How much subcooling         21       there?         22       MR. ALAMGIR: In terms of it's a fac         23       of three condensing capacity. So I would say if	ause
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5       if the water starts flowing and steam is rushing         6       meet it, will that cause any binding?         7       One of the important things to realize         8       that the water level is above the GDCS line when         9       CCFL when the GDCS flow starts. So initially the         10       is no competition. There is, however, a period         11       about a few hundred seconds, and the plot will at         12       it, when the GDCS line is uncovered and that's will         13       the question arises, will it impede?         14       From our analysis, we find that there         15       so much condensing capacity in the GDCS flow it         16       almost thrice the amount of condensing capacity if         17       it can condense the steam in the facility. And if         18       is why it kills the steam before it can even si         19       producing any difficulty.         20       MEMBER BANERJEE: How much subcooling         21       there?         22       MR. ALAMGIR: In terms of it's a fax         23       of three condensing capacity. So I would say if	
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22 MR. ALAMGIR: In terms of it's a fac 23 of three condensing capacity. So I would say 3	g is
23 of three condensing capacity. So I would say 3	
	actor
24 319 к	317,
25 MEMBER BANERJEE: Was this water at :	room
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<pre>1 temperature? 2 MR. ALAMGIR: It's basically about 2 alogo to room tomporature and new the reagter</pre>	is at
	is at
alogo to noom tomponations and not the matches	
3 close to room temperature, and now the reactor	ity.
4 about a few bars. So very large condensing capac	
5 MEMBER CORRADINI: So the subcooli	ng is
6 about 80 C approximately, right? You said a few	bars.
7 That's about 407 Kelvin and 319?	
8 MR. ALAMGIR: The temperature is a	round
9 400 or so.	
10 MEMBER CORRADINI: Yes.	
11 MR. ALAMGIR: Yes. So about 80 yo	u are
12 right.	
13 MEMBER CORRADINI: Right.	
14 MR. ALAMGIR: And, of course, the pre	ssure
15 is still decreasing at that time.	
16 MEMBER CORRADINI: Yes.	
17 MR. ALAMGIR: All right. So having	said
18 that	
19 MEMBER BANERJEE: The idea is that	t the
20 steam will not enter the line because it will s	imply
21 condense in the outflow on the line?	
22 MR. ALAMGIR: Initially, when it unco	vers,
23 of course it sees cold water rushing out.	
24 MEMBER BANERJEE: Right.	
25 MR. ALAMGIR: So there is a co	mplex
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22 1 phenomena there, but from all we have seen, including 2 some data that I will show -- and, George, we may need 3 to get the backup slide -- shows -- this is a set of 4 experiments related to water hammer in Slovenia, but 5 they had a pipe and we'll show that when steam meets the water, very cold water, the cold water floods the 6 -- I mean, flows through the pipe in about 10 to 12 7 8 seconds, under generally similar conditions also, 9 although slightly higher pressure. 10 MEMBER ABDEL-KHALIK: Does the line always run full? 11 12 MR. ALAMGIR: In the --MEMBER ABDEL-KHALIK: in 13 Even later stages? 14 MR. ALAMGIR: Yes. Full in the sense that 15 if you don't assume any GDCS, any non-condensable 16 17 event, and we have analyzed the case where let's say you put some non-condensable coming from the GDCS 18 19 pool, may be a burst of something, who knows. We assume the worst, and I will show you that the effect 20 21 on the GDCS flow magnitude is small. 22 MEMBER ABDEL-KHALIK: So you never form a free surface --23 24 MR. ALAMGIR: That's correct. 25 MEMBER ABDEL-KHALIK: -- inside the line? **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

	23
1	MR. ALAMGIR: That's correct. As far as
2	from our analysis, no.
3	MEMBER BANERJEE: Not from the steam.
4	MR. ALAMGIR: Not from the steam, not from
5	well, from non-condensables, if you have a bubble,
6	you have some surface, but not a free surface, not
7	stratified flow. That's all I see.
8	We have some sensitivities where we put in
9	non-condensables on the other side of the squib valve,
10	let it reside for a few seconds, and then let the GDCS
11	flow come in, and see if it gets into trouble. It
12	doesn't. It pushes it out.
13	MR. MARQUINO: We have provided detailed
14	information to the staff on the water levels in the
15	pool and the reactor vessel. The time required for
16	the pool to drain into the vessel is on the order of
17	half an hour. In the long term, we end up with a low
18	level in the pool, and it equilibrates in the with
19	the water level in the reactor vessel.
20	I think your question is directed at the
21	drain-down period, right? And, yes, during the drain-
22	down period the line remains full, because the level
23	in the pool is above the suction of the pipe.
24	MR. ALAMGIR: About seven-plus to 10
25	meters.
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24 MEMBER BANERJEE: What is the velocity in 1 2 the pipe? the pipe? 3 MR. ALAMGIR: In GDCS 4 Typically, less than 10 meters. At the throat of the 5 venturi it's about 10 to 12 meters per second. MEMBER BANERJEE: And in the line itself? 6 MR. ALAMGIR: It's, I would say -- I 7 8 looked at it at different times -- two to three 9 meters. 10 MEMBER BANERJEE: So it's quite a high velocity. 11 12 MR. ALAMGIR: Yes. Yes. MEMBER BANERJEE: Given by quite a large 13 head. 14 MR. ALAMGIR: Large head, large condensing 15 capacity, large velocities. 16 17 MEMBER BANERJEE: But you've still got quite a lot of pressure in the reactor, three or four 18 19 bars, right? 20 MR. ALAMGIR: Yes. MEMBER BANERJEE: What is the differential 21 22 pressure? 23 MR. ALAMGIR: Between? MEMBER BANERJEE: The outlet of the pipe 24 25 and the -- at 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

	25
1	MR. ALAMGIR: It's the head.
2	MEMBER CORRADINI: It's just the gravity
3	head. By this time, it should be in communication.
4	So whatever the pressure is in the vessel is the
5	pressure in the drywell.
6	MR. ALAMGIR: About eight to 10 meters of
7	solid water.
8	MEMBER ABDEL-KHALIK: So what is the
9	volume of pipe between the squib valve and the check
10	valve?
11	MR. ALAMGIR: In terms fraction?
12	MEMBER ABDEL-KHALIK: No, just total
13	volume. Cubic feet.
14	MR. ALAMGIR: I don't have that number. I
15	can
16	MEMBER ABDEL-KHALIK: What's the distance?
17	MR. ALAMGIR: We have a diagram. It's on
18	Slide 3.
19	MEMBER ABDEL-KHALIK: When you did these
20	parametrics of allowing non-condensable gas in the
21	line, did you go all the way to the point where that
22	entire space between the check valve and the squib
23	valve is filled with non-condensable gas?
24	MR. ALAMGIR: At time zero, yes. We
25	filled it with up to 30 percent non-condensable.
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MR. KINSEY: Excuse me. This is Jim 1 2 Kinsey from GEH. I think the slides that we have may answer many of your questions, and I think you may be 3 4 able to --5 MEMBER CORRADINI: I think you may need to move on. 6 MR. KINSEY: -- move through that, and 7 8 then --9 MR. ALAMGIR: Yes, okay. MR. KINSEY: -- come back to them --10 11 MR. ALAMGIR: All right. 12 MR. KINSEY: \_\_\_ if we don't cover something. 13 MEMBER CORRADINI: You can tell us 14 to 15 wait. It's okay. MR. ALAMGIR: All right. Thank you. 16 Ι 17 was not sure about the etiquette in the morning. 18 (Laughter.) 19 Thanks. 20 Yes, we did put in some non-condensable --21 MEMBER ABDEL-KHALIK: We will talk about it when you get to it. 22 23 MR. ALAMGIR: All right. Yes. Next slide, so the summary is that -- on 24 25 Slide 3 -- or Slide 2 is that none of these effects **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

	27
1	are important, and TRAC has models for CCFL. It has
2	models to handle non-condensables. It has models for
3	handling stratified flow.
4	MEMBER BANERJEE: The problem is CCFL at
5	elbows. There is quite a drop in CCF
6	MR. ALAMGIR: If steam can get there.
7	MEMBER BANERJEE: Yes. If there is, so
8	your defense is saying that the steam never gets
9	there.
10	MR. ALAMGIR: Correct.
11	MEMBER BANERJEE: But the fact that TRAC
12	has a model for CCFL may not be there the right
13	model, because TRAC has a model for interfacial
14	friction. It doesn't have a model explicitly for
15	CCFL, unless you put one in.
16	MR. ALAMGIR: We have CCFL model.
17	MEMBER BANERJEE: If you put it in
18	MR. ALAMGIR: Yes. Based on Professor
19	Wallis' correlation, we have backed out interfacial
20	sheer.
21	MEMBER BANERJEE: That's what I mean.
22	MR. ALAMGIR: Yes.
23	MEMBER BANERJEE: You have a model for
24	interfacial friction, not for CCF
25	MR. ALAMGIR: We have CCFL as a limiting
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	28
1	condition flow. It checks.
2	MEMBER BANERJEE: Yes, it checks it, but
3	the model is for interfacial friction. You have
4	backed out
5	MR. ALAMGIR: Right. It calculates the
6	velocity of the interface. Then, it checks against
7	the critical outset correlation.
8	MEMBER BANERJEE: Yes. The problem at an
9	elbow is you get a hydraulic jump, so it tends to give
10	you a much more rigorous than with Graham Wallis'
11	correlation.
12	MR. ALAMGIR: I agree, if we get CCFL
13	available. In this case, we do not.
14	MEMBER BANERJEE: In this case, we are
15	saying steam never gets there, but
16	MR. ALAMGIR: Right.
17	MEMBER BANERJEE: the non-condensables
18	could.
19	MR. ALAMGIR: We analyzed that, and non-
20	condensables vented.
21	MEMBER BANERJEE: I'm not if you are
22	running this with TRAC, I'm not 100 percent sure that
23	it captures the right phenomena. We can discuss this
24	in more detail as I as we go along
25	MR. ALAMGIR: Right.
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	29
1	MEMBER BANERJEE: but I think
2	MEMBER CORRADINI: Keep on going.
3	MR. ALAMGIR: I have also thought about it
4	from a phenomenological point of view, relativity
5	velocity, how it separates.
6	MEMBER BANERJEE: There were a lot of
7	experiments done on this, because Ontario Hydro has
8	elbows in its feeders. The feeders are smaller than
9	your pipes, but of course the limiting points are at
10	the elbows. And it's also found in oil gas pipelines
11	when you have counter-current flow the same
12	phenomena actually. It's much more limiting, because
13	of the hydraulic jump, as you get a draining film of
14	draining liquid, because a jump which tends to block
15	the pipe.
16	MR. ALAMGIR: This particular one I might
17	clarify it's got a 10-meter driving head. Anything
18	on its way is pushed out.
19	MEMBER BANERJEE: Well
20	MR. ALAMGIR: We can discuss
21	MEMBER BANERJEE: this is what your
22	calculation will show, right?
23	MR. ALAMGIR: That's the reality of
24	gravity acting on fluid. It will make it flow through
25	the hole at with that velocity, square root of h.
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	30
1	MEMBER BANERJEE: Okay.
2	MR. ALAMGIR: All right. Moving on, if I
3	may thank you. In the next slide we show the
4	layout schematic of the GDCS line. In the top left-
5	hand corner is the GDCS pool, and we show one division
6	here, which is one eight-inch pipe coming out. And
7	then, from there we have two lines A and B. We
8	show A going into the vessel, and as we can see there
9	is a where is the pointer again? I haven't done
10	this before.
11	All right. So this is an eight-inch line,
12	and it comes down, and here is the squib valve. And
13	then, it this is water-sealed, prevents gas from
14	going through. And our current design is focused on
15	the fact that we will slope away from the high points.
16	This is a high point, that's a high point. We'll
17	slope away, so that the non-condensables can vent.
18	And there is this GDCS venturi nozzle here
19	that limits the critical flow. Also, GDCS break, also
20	there is a check valve here that allows doesn't
21	allow backflow. That is the configuration.
22	And, Professor Khalik, I think you asked a
23	question about what fraction of this line is on either
24	side of the squib valve. Is that correct?
25	MEMBER ABDEL-KHALIK: Just the one side,
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31 1 between the squib valve and the check valve, the 2 distance. You said that you assume that you have 30 3 percent non-condensable gas --4 MR. ALAMGIR: Yes. 5 MEMBER ABDEL-KHALIK: -- by volume. Why 6 30 percent? 7 MR. ALAMGIR: No, I -- what we did is a 8 sensitivity study, and we will show in the next slide 9 where we have put in up to 30 percent of non-10 condensable gas on either side of the squib valve, 11 just to see if non-condensable degrades the magnitude 12 of the GDCS flow or if it binds in it. MEMBER ABDEL-KHALIK: There is a mechanism 13 for non-condensable gas to accumulate between 14 the 15 check valve and the squib valve. There is always the potential that that entire volume would be filled with 16 17 gas. MR. ALAMGIR: We can put 100 percent. 18 I 19 am sure that it will drive it out because of the head. 20 MEMBER ABDEL-KHALIK: Do you have calculations to support that? 21 MR. ALAMGIR: We are running it currently, 22 yes, but we are showing up to 30 percent. If it's --23 MEMBER CORRADINI: So let me -- just to 24 25 clarify, so you are doing a range of calculations. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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	32
1	But what you are going to show us is up to 30 percent
2	gas fraction.
3	MR. ALAMGIR: And, by the way, 30 percent
4	is a very large number for
5	MEMBER CORRADINI: I want to make sure
6	I've got what you said correctly. So we're going to
7	see results for up to 30 percent, right?
8	MR. ALAMGIR: That's correct, yes.
9	All right. In the next slide so this
10	one shows the routing. Again, it shows more numbers,
11	elevations, and orientation/arrangement. This is
12	something HRS wanted to see. And the red arrow shows
13	one line, one division coming out, and then we follow
14	it through one injection line that
15	MR. MARQUINO: And I apologize, we don't
16	have the length of pipe between the check valve and
17	the squib valve indicated on this drawing. But we
18	will get that information to you, to answer your
19	question.
20	MEMBER ABDEL-KHALIK: But that line is not
21	a horizontal line. It's part vertical, part
22	horizontal. Is that correct? Am I reading this graph
23	correctly?
24	MR. ALAMGIR: Let's understand it. This
25	is a squib valve. So and this is like the loop
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	33
1	seal
2	MEMBER ABDEL-KHALIK: The loop seal.
3	MR. ALAMGIR: water seal.
4	MEMBER ABDEL-KHALIK: Right.
5	MR. ALAMGIR: So it goes up, and then this
6	is horizontal or sloped slightly. Does that answer
7	MEMBER BLEY: All of the horizontal
8	sections are sloped.
9	MR. ALAMGIR: That's our intention right
10	now in the design, correct.
11	Jesus?
12	MR. DIAZ-QUIROZ: Yes, I would like to add
13	that the check valve itself is the design calls out
14	for having it be open at all times. So during standby
15	mode it will be opened, and then it will close during
16	initial opening of the squib valve due to back
17	pressure initially. So that negates some of the
18	possibilities of accumulating non-condensables between
19	the squib valve and the check valve for during
20	standby mode.
21	MEMBER BLEY: So it's a swing check and
22	it's hung
23	MR. DIAZ-QUIROZ: It's not a swing check
24	at this point, no, it's not. But here it's shown in
25	the vertical position, but that's the orientation that
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34 1 more than likely gravity will assist any -- in this 2 case, a piston-type check valve that -- that it would 3 be selected, and that will keep it open. But it will 4 be gravity-assisted as far as in the standby mode to 5 stay open. MEMBER ABDEL-KHALIK: Now, what is the 6 7 purpose of this check valve? 8 DIAZ-OUIROZ: The purpose of this MR. 9 check valve is initially during blowdown it's a depressurization of the vessel is -- it has not come 10 11 down far enough. There is a timer on the squib valve 12 when initial blowdown occurs to where the pressure in the vessel is much higher than the available gravity 13 head available from the pool to the injection point. 14 So this allows any backflow to be stopped 15 from going up the line initially, and then it --16 MEMBER ABDEL-KHALIK: So it prevents flow 17 from the vessel to the tank. 18 19 MR. DIAZ-QUIROZ: To the tank, yes, initially. 20 MEMBER ABDEL-KHALIK: So you are saying 21 you are running online with this valve open? 22 MR. DIAZ-QUIROZ: 23 Yes. But the squib valve provides the seal -- the seal during normal 24 25 And then, having it open alleviates any operation. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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	35
1	issues of it accumulating gas and such.
2	MEMBER ABDEL-KHALIK: So a squib valve
3	failure during operation would have water from the
4	reactor vessel go up that line, into the tank, and
5	probably spewing all
6	MR. DIAZ-QUIROZ: That is the the check
7	valve will close during reverse flow.
8	MEMBER ABDEL-KHALIK: Thank you.
9	MR. ALAMGIR: And I want to add that we
10	are as far as gas venting goes, very quickly we are
11	aware of the NEI guidelines for addressing the venting
12	of accumulation of gas and inclusion of gas. And,
13	therefore, we have considered that actively in our
14	design.
15	MEMBER BANERJEE: Do you have vent points
16	along this line?
17	MR. ALAMGIR: He is our chief GDCS line
18	engineer.
19	MR. DIAZ-QUIROZ: Right now, there aren't
20	any vent points because of the sloping of the lines
21	themselves. In this case where you start upstream of
22	the squib valve, that's sloped up, and then you have
23	vertical runs along with sloping upwards towards the
24	pool that allow anything to vent up into the pool,
25	which is connected to the drywell airspace itself.
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1	So
2	MEMBER BANERJEE: Have you ever done any
3	experiments with this?
4	MR. MARQUINO: We have done gravity drain
5	system experiments. GE has done them in San Jose, and
6	Toshiba has done them in Japan.
7	MEMBER BANERJEE: So you have full-scale
8	draining experiments.
9	MR. MARQUINO: Full height. Yes, full
10	height with some volumetric scale.
11	MEMBER BANERJEE: Did you have the system
12	mocked up fairly precisely compared to this with the
13	little slopes and things?
14	MR. MARQUINO: Yes. The slope the
15	pipes were sloped consistent with our design.
16	MEMBER BANERJEE: Did you put any non-
17	condensables in to see what happened?
18	MR. MARQUINO: I don't think so. I'm not
19	sure.
20	MR. ALAMGIR: There was a first attempt
21	1992, I did the TRAC modeling of
22	MEMBER BANERJEE: This was for the ESBWR?
23	MR. ALAMGIR: Yes, the facility that was
24	in the backyard.
25	MEMBER BANERJEE: You have dismantled all
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1	your useful facilities by now, right? In other words,
2	you can't do this again.
3	MR. MARQUINO: We moved to North Carolina.
4	MR. ALAMGIR: There is some
5	MS. CUBBAGE: Excuse me. I think we're
6	going to run out of time. I mean
7	MR. ALAMGIR: Okay. Next slide shows back
8	to the test. This is a LOCA GDCS line break. It
9	shows uncovery of the GDCS line, the circles. What
10	you are seeing is the curve for two-phase level, which
11	goes down. This is the downcomer two-phase level, and
12	it the two circles show where it first time covers,
13	the GDCS line, and then when it recovers.
14	Uncovers at about 500 seconds, recovers
15	about 940 seconds. So there's about a good eight
16	minutes, seven to eight minutes of uncovery.
17	MEMBER BANERJEE: What's the pressure at
18	the start of the uncovery? Is there already a high
19	flow established at the time of uncovery?
20	MR. ALAMGIR: As I mentioned, when it is
21	covered, the GDCS flow starts. So it's already
22	underway.
23	MEMBER BANERJEE: When does it start up
24	here?
25	MR. ALAMGIR: As you see in the next
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1	slide, if we can go we can the GDCS flow starts	
2	at 460, 450, 460 seconds, and it uncovers at about	
3	500. So slightly less than a minute, about 40 seconds	
4	of full flow.	
5	And it establishes the flow rather	
6	quickly, reaches the plateau. The plateau indicates	
7	that that's the driving head.	
8	MEMBER ABDEL-KHALIK: I'm sorry. Could	
9	you go back to the previous graph?	
10	MR. ALAMGIR: Yes.	
11	MEMBER ABDEL-KHALIK: What's being plotted	
12	here?	
13	MR. ALAMGIR: What is plotted is the two-	
14	phase level in the ESBWR downcomer versus time during	
15	a GDCS line LOCA GDCS line break LOCA.	
16	MEMBER CORRADINI: The various DCs just	
17	for our clarification, DC-1109, 1114, these are	
18	MR. ALAMGIR: These the nodes of TRAC.	
19	MEMBER CORRADINI: Ah, thank you. All	
20	right.	
21	MEMBER BANERJEE: And these are actually	
22	two-phase levels.	
23	MEMBER CORRADINI: Two-phase levels, yes.	
24	MR. ALAMGIR: There is also a collapsed	
25	level, the black line that's running behind. After a	
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single phase they're synonymous.

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2 Moving on, so we can see that the GDCS 3 flow establishes rather quickly, plateaus, and then as the -- it is driven by the difference in pressure 4 5 between the GDCS pool and the vessel, as well as affected by condensation that is occurring due to the 6 7 cold water in the vessel. And, therefore, at some 8 point the water level starts rising, both in downcomer 9 and chimney. When it is above the chimney, it is 10 totally full, and, therefore, there is slight 11 oscillation going on with --12 MEMBER BANERJEE: I'm still trying to go back to this slide. Your two-phase level seems very 13 high compared to the collapsed liquid level. Is that 14 15 because you have very high voidage? As you can see, there is a 16 MR. ALAMGIR:

blip in t hat -- in the collapsed level as well as in two-phase level there is flashing, so everything is charging up.

20 MEMBER BANERJEE: But even so, I mean, 21 what is that black line comparable to the red line in 22 terms of if I wanted to get an average void fraction 23 in the -- to get the two-phase level?

24 MR. ALAMGIR: I do not have the number. I 25 can find it in --

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1	MEMBER BANERJEE: I'm just wondering,
2	because this is like six feet or six meters, and the
3	other thing is 14 meters.
4	MR. ALAMGIR: It's a
5	MEMBER BANERJEE: Is it not comparable to
6	each other?
7	MR. ALAMGIR: It's swell due to flashing.
8	MEMBER BANERJEE: But swell due to
9	flashing, that seems a pretty high swell.
10	MR. ALAMGIR: I have lived through it
11	through test facilities. I have seen it. It occurs.
12	MEMBER BANERJEE: But that means that the
13	void fraction is over 50 percent, 70 percent. You
14	don't get bubbly flow here then, right? It's churn-
15	turbulent or some
16	MR. ALAMGIR: At that low pressure with
17	the very high specific volume, very large specific
18	volume, you can get and we are getting into
19	MEMBER BANERJEE: Well, in that case, you
20	can also get steam going into the line during that
21	period.
22	MR. ALAMGIR: No, that's a separate issue,
23	and main steamline break is the more limiting case to
24	show whether it goes and entrains into the steam
25	MEMBER BANERJEE: Well, I'm wondering
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1	whether you can get significant steam into the line
2	during the period between 460 and 500 seconds.
3	MR. ALAMGIR: Not in this case.
4	MR. MARQUINO: I want to answer one of
5	your previous questions. You asked what pressure it's
6	at. When flow begins, the reactors depressurize to
7	about 250 kiloPascal. So that would be around
8	40 psig. So the because it's a gravity drain
9	system, the flow the system has to depressurize
10	before flow begins.
11	MEMBER BANERJEE: This is what you see on
12	the red curve. It's slowly starting to go up.
13	Now, what I'm wondering is, because you've
14	got so much voidage that now, whether the voidage
15	is in the vicinity of the GDCS line outlet or not, I
16	don't know. I'd have to look in detail at what you
17	have done. But it seems to me that there is a
18	potential for steam entering certainly during that
19	period, right?
20	MR. ALAMGIR: Of course steam is flowing.
21	You are saying liquid entering.
22	MEMBER BANERJEE: Well, whatever entering,
23	because you've got 80 percent void fraction mess out
24	there.
25	MR. ALAMGIR: I believe Dr. Chester Cheung
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1	has looked at it in the main steamline break.
2	MEMBER BANERJEE: How has he looked at it?
3	MR. ALAMGIR: He
4	MEMBER BANERJEE: With his eyes, or an
5	experiment, or
6	MR. ALAMGIR: No, no, through TRAC
7	calculation.
8	MEMBER BANERJEE: TRAC calculations.
9	MR. ALAMGIR: Yes.
10	MEMBER BANERJEE: And you believe that
11	TRAC calculations are able to track this?
12	MR. ALAMGIR: Unless you give me some
13	better tool.
14	MR. MARQUINO: What would be the mechanism
15	to force gas flow through this line and downward?
16	MEMBER BANERJEE: It just may not be
17	filled with these very low velocities.
18	MEMBER CORRADINI: I think what Sanjoy is
19	saying, unless I misunderstand, is and we could be
20	misunderstanding the graph, but that's
21	MEMBER BANERJEE: Yes, right.
22	MEMBER CORRADINI: In Graph 6, you're
23	getting a void fraction just by a height ratio that is
24	large enough that one would expect at the outlet of
25	your isometric here that water would just start
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43 leaking out. So you could fill that first part of the line. I'm not sure the loop seal is going to -- I don't think loop seal is below it. I was looking at elevations. Your loop seal still could be filled with Ι think his water, but question, unless Ι misunderstand it, is this initial portion here would 6 just purge itself of water. MEMBER BANERJEE: It could be -- it could 9 be not completely filled. 10 MR. ALAMGIR: That is not a problem. Ιf the two-phase mixture -- if two-phase mixture gets 11 12 into the portion of the GDCS line, it's flushed out when the squib valve opens. 13 And we have that

sensitivity. My answer is based on TRAC.

MEMBER CORRADINI: And that section of the 15 line is full of cold water, so that -- that section of 16 17 line is not going to be flashing like the the downcomer during the depressurization. 18

19 MEMBER BANERJEE: Ι guess are we SO focused on this because this is one of the few -- this 20 is a unique aspect of this design, and it really has 21 to work if you are going to have this reactor cooled. 22

Yes, and we believe it 23 MR. ALAMGIR: 24 works. We will keep working at it, so that it works. 25 Experiments would be MEMBER BANERJEE:

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good.

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2	MR. MARQUINO: We have experiments, but to
3	put this in perspective, I think you probably would
4	agree that this phenomena that you're discussing would
5	even if it exists, it would only be for a small
6	period during the depressurization. And at the end of
7	the depressurization, you have a situation where the
8	vessels, a tank yes, the water level in the tank is
9	below the nozzle, and you have cold water in a pool
10	that has to drain into the vessel.
11	At that point, there is no mechanism to

12 drive gas flow back into the pipe and down, so 13 people --

MEMBER BANERJEE: I think with the steam 14 ingress I agree that it would be a short period of 15 16 time. I'm not all that concerned about that. It 17 could be that you'll get some steam in whatever, but 18 it will condense probably. The problem more is whether you can get a bubble of non-condensables 19 sitting somewhere in that line hanging up the flow 20 21 over a long period of time. Clearly, that's the 22 concern.

23 MR. ALAMGIR: And I did a sensitivity up 24 to 30 percent void, putting a bubble there, both sides 25 of the squib valve, and see what happens when that

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squib	valve	opens.
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MEMBER BANERJEE: Okay. Let's continue.

MR. ALAMGIR: Thanks for good questions.

All right. Here we show -- this is a digression going back to the condition of steam meeting water, cold water meeting hot steam. This is an experiment in Slovenia, NUREG-12, Pittsburgh, a couple of years ago, one year ago.

9 There are four -- this is a straight pipe, 10 about three centimeters, or seven -- diameter about 11 three meters long. Conditions are about 30 bars of 12 higher than -- somewhat higher than GDCS condition.

But what is important to see is when cold 13 water starts going out, or is being injected in the 14 lower left-hand corner, and steam is being injected in 15 16 the upper right-hand corner, how the temperatures --T1, T2, T3, and T4 -- show the migration of the cold 17 18 water interface and whether or not -- this is not a 19 water hammer test. There are a series of tests -water hammer for -- in this experiment, but this is 20 21 not one.

It shows how cold water goes from station 1 through 4, and CFD analysis accompanying it. Okay? So --

MEMBER BANERJEE: What is the CFD

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1	analysis?
2	MR. ALAMGIR: This is something done at
3	over there by CFX and Neptune modeling this test, how
4	cold water meets steam, and whether or not
5	MEMBER BANERJEE: How do they sustain an
6	interface?
7	MR. ALAMGIR: I have I don't want to
8	get into that detail. I have a slide that shows how
9	the cold water interfaced
10	MEMBER BANERJEE: Do you need the CFD or
11	not? If you don't need the CFD, forget it.
12	MR. ALAMGIR: I do not need the point I
13	want to make is that there is no binding here under
14	such harsh conditions.
15	The next slide shows the test as cold
16	water goes from Section 1 through 4, so you go T1, T2,
17	T3, T4, and the red lines show how the steam the
18	temperature drops from steam temperature to cold water
19	temperature, meaning that waterfront has moved very
20	rapidly.
21	MEMBER BANERJEE: So CFD calculation?
22	MR. ALAMGIR: Data. Red is data, and the
23	rest is CFD. So under about 10 seconds the pipe runs
24	full, three-meter long pipe.
25	MEMBER BANERJEE: Okay. What does the
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47 1 temperature show me there? Can you explain that? 2 MR. ALAMGIR: Yes. So when the When it 3 temperature is high, that means it is steam. is low, that means cold water has moved in from left 4 5 to the right. So in about two seconds the cold water 6 reaches the first temperature measurement station. In about 10 seconds, it -- eight seconds it reaches the 7 8 fourth station. So it's moving at fairly uniform 9 speed of about two seconds per station, and that would be less than a meter. 10 There is no rollback of the steam forming 11 12 bubbles, and so on. That was some of the concern. MEMBER ABDEL-KHALIK: So what is that 13 second peak in T3? 14 15 MR. ALAMGIR: I am just quoting their plot. 16 MEMBER ABDEL-KHALIK: T3. 17 MR. ALAMGIR: T3, the second peak. 18 19 MEMBER ABDEL-KHALIK: Right. 20 MR. ALAMGIR: I have not read thoroughly, but I would imagine that there is a steam bubble 21 22 that --23 MEMBER ABDEL-KHALIK: If you don't understand it --24 25 MR. ALAMGIR: -- hanging there, but it **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	collapses.
2	MEMBER ABDEL-KHALIK: You said you haven't
3	read this thoroughly, and yet you're using this as a
4	justification.
5	MR. ALAMGIR: I have not read the test
6	report. I don't have access to it yet. I have read
7	their paper. The paper is available, and we can
8	MEMBER ABDEL-KHALIK: The question
9	remains: what does this peak represent?
10	MR. ALAMGIR: In my interpretation, the
11	peak represents that there is a steam bubble
12	temporarily for about a second, which collapses as the
13	waterfront comes in.
14	And, George, could you please go to the
15	slide that
16	MEMBER CORRADINI: I think we're going to
17	run out of time. So unless you desperately need to
18	use this as part of your justification, I recommend we
19	move on.
20	MR. ALAMGIR: Yes. We have a CFD slide
21	that can answer. We can show you during the break.
22	All right. So next slide shows the
23	summary of the non-condensable sensitivity. So here,
24	as I mentioned to you, we put non-condensables in
25	various locations.
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49 First, to put in a GDCS pool, we made it 1 30 percent void fraction with air, not steam. 2 That means essentially it will have 30 percent less static 3 head to drive in the end. 4 5 Second, we put up to 30 percent on either side of the squib valve. 6 7 MEMBER BANERJEE: Up to 30 percent? What 8 do you mean by --9 MR. ALAMGIR: Zero, 15, and 30, those were 10 the three --MEMBER BANERJEE: Do you mean the length 11 12 of pipe is --MR. ALAMGIR: Void fraction. 13 MEMBER CORRADINI: No. But he wants to 14 15 know over what length. MEMBER BANERJEE: Yes, over what length. 16 MR. ALAMGIR: The entire length. Entire 17 length. We put initial -- assuming that -- suppose --18 19 now it would be the gas valve to the right of the squib valve in this diagram, in the previous diagram. 20 21 So we put up to 30 percent --MEMBER BANERJEE: Out of the GDCS pool, up 22 to the elbow? 23 MR. ALAMGIR: Up to the squib valve, all 24 25 the way down. Assuming that the entire pipe -- this **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	is the worst scenario in this
2	MEMBER BANERJEE: So the squib valve is in
3	a sort of a little seal, right?
4	MR. ALAMGIR: That's correct.
5	MEMBER BANERJEE: So you put 30 percent
6	void on each side up to what point?
7	MR. ALAMGIR: All the way up to GDCS pool
8	on one side and all the way to the RPV on the other
9	side.
10	MEMBER BANERJEE: Ah.
11	MEMBER CORRADINI: The whole pipe. The
12	entire
13	MR. ALAMGIR: Whole pipe.
14	MEMBER CORRADINI: Everything.
15	MR. ALAMGIR: Yes.
16	MEMBER CORRADINI: That's what we didn't
17	understand.
18	MR. ALAMGIR: Okay.
19	MEMBER BANERJEE: Now, did you put this as
20	a continuous thing, or did you just put a
21	MR. ALAMGIR: Initial condition.
22	MEMBER BANERJEE: So if you put, say,
23	initially instead of putting 30 percent all the way
24	to the GDCS, if you just took a piece of the pipe and
25	put 100 percent in that region, like a bubble sitting
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1	there, did you do something like that?
2	MR. ALAMGIR: We went 100 percent void.
3	MEMBER BANERJEE: Correct. Yes, between
4	the squib valve and the
5	MR. ALAMGIR: Locally it can be 100
6	percent, but I did not. I put up to 30 percent. That
7	means there is a bubble.
8	MEMBER BANERJEE: So you made a stratified
9	initial condition with 30 percent.
10	MR. ALAMGIR: Thirty percent is bubbly.
11	MEMBER BANERJEE: The horizontal pipe at
12	rest? How can it be bubbly?
13	MR. ALAMGIR: I put it as a uniform void
14	fraction and let the core sort out what it is.
15	MEMBER BANERJEE: A uniform void fraction
16	has a high surface area, therefore, it will get driven
17	out.
18	MR. ALAMGIR: We can do more the point
19	here was to just see, first, the
20	MEMBER BANERJEE: Well, I understand what
21	you've done now. So you've put that 30 percent
22	uniformly distributed using some bubble size
23	MR. ALAMGIR: Right.
24	MEMBER BANERJEE: as an initial
25	condition. What was the bubble size?
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52 MR. ALAMGIR: We put in void fraction, not 1 2 the bubble size. 3 MEMBER BANERJEE: You put in the void So TRAC found the void -- the bubble size. 4 fraction. 5 MR. ALAMGIR: Yes. MEMBER BANERJEE: What was that bubble 6 size? 7 MR. ALAMGIR: We can back it out. I don't 8 9 have the number. 10 MEMBER BANERJEE: Ιf it was small, obviously it will be driven out. 11 12 MEMBER ABDEL-KHALIK: I mean, you know, if you're assuming homogeneous flow throughout this line, 13 of course it will go through. 14 15 MR. ALAMGIR: However, TRAC has the stratified flow model. It will look at the gravity 16 17 head in the JSM portion and create stratified flow. 18 MEMBER BANERJEE: TRAC does not 19 automatically take bubbly flow and make it а stratified, except through a flow regime map of some 20 sort. 21 MR. ALAMGIR: Yes, it has a flow number --22 MEMBER BANERJEE: It doesn't have a vapor 23 disengagement model in it. 24 So --25 MR. It has flow ALAMGIR: а number **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

condition, and we can get into that. Yen Sanderson can answer that.

Whether your initial 3 MEMBER BANERJEE: 4 condition was representative of, say, a bubble being 5 trapped between the horizontal leg and, say, the 6 vertical leg, now it's sloped so it will tend to clear 7 itself -- I agree with that. But if you started with 8 that condition, you know, the question is whether the 9 flow would be slowed down enough that it wouldn't get 10 swept out. If it was homogeneous initial conditions, 11 clearly it would --12 MR. ALAMGIR: It is not a homogeneous flow condition. We have certain size node in TRAC. 13

Putting a 30 percent void does not mean that we are saying it's not a bubble there. We can --

MR. MARQUINO: You have said that the flow would stop or you're implying that there would be zero flow. In my experience, if I have an eight-inch pipe and it's full of gas, air --

20 MEMBER BANERJEE: You'd still get some 21 flow, yes.

22 MR. MARQUINO: -- and I have a pool with a 23 couple of meters of water above it, I'm going to get 24 flow that's going to drain down. And I'm not an 25 expert.

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1	MEMBER BANERJEE: The flow will be the
2	bubble-rise velocity.
3	MR. MARQUINO: I'm not going to tell you
4	what regime it's going to be in, but there will be
5	flow from the pool through this pipe.
6	MEMBER BANERJEE: If you look at the flow
7	coming around a vapor bubble, if you have a flow which
8	is equal to the bubble-rise velocity, it will just
9	stay still.
10	MEMBER CORRADINI: It will be an equal
11	volume flow in opposite directions. I think we're
12	going to have to move on, but I'm just going to say
13	that I think the takeaway from the Committee at this
14	point is we are interested and we are still wanting to
15	understand a bit more. And we can get to more later.
16	MR. ALAMGIR: Yes.
17	MEMBER CORRADINI: I have one thing that
18	has nothing to do with calculation. You said
19	something that I heard, but I want to make sure I
20	heard it correctly. You have no intent to put
21	anywhere in any of these elbows a vent line to test to
22	make sure?
23	MR. DIAZ-QUIROZ: Test lines, yes.
24	MEMBER CORRADINI: Well, I'm trying to
25	understand in this isometric where you are going to
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1	put little valves and little pipes to check to see if
2	something is there, or you're not. That's what I want
3	to make
4	MR. DIAZ-QUIROZ: I'm sorry. When the
5	question was asked, were vents going to be put in
6	place, I assumed vents to continuously vent the line.
7	MEMBER CORRADINI: Okay.
8	MR. DIAZ-QUIROZ: No. There will be test
9	lines, and
10	MEMBER CORRADINI: And those are yet to be
11	determined where they will sit?
12	MR. DIAZ-QUIROZ: They will be right.
13	But it will have them between on either side of
14	those squib valves.
15	MEMBER CORRADINI: Okay.
16	MR. DIAZ-QUIROZ: And as well at the high
17	points. In this case
18	MR. ALAMGIR: Mr. Corradini, we are
19	engaged with them through NEI guidelines to understand
20	this and
21	MEMBER CORRADINI: Okay. But I thought I
22	wanted to check again, because I misunderstood.
23	MS. CUBBAGE: And at this point at this
24	phase in the review, we are looking for the Committee
25	to concur that the staff has identified the
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1	appropriate open items. This was an open item that
2	was added based on the Committee's concern.
3	Staff has not received a response from GE
4	on this. I think they are hearing a lot of good
5	feedback here that they should try to address in their
6	RAI response, and you will be briefed on this when the
7	issue is resolved by the staff.
8	MEMBER BANERJEE: Venting is good also.
9	Experiments and vents both.
10	MR. ALAMGIR: Thank you.
11	MR. DIAZ-QUIROZ: Good.
12	MR. ALAMGIR: So, finally, moving to this
13	almost last slide here this is the last slide it
14	shows the effect of the sensitivity study. Three
15	things as expected, because of the voiding in the
16	void put in the GDCS line and the pool, we get less
17	static head. So with larger voids, we get delayed
18	GDCS onset, slight delay, a few seconds.
19	But the magnitude, as you can see, is not
20	impacted that much. The 30 percent void case is
21	within 80 percent of or 85 percent of the real
22	case. Fifteen percent shows pretty close to original.
23	So my takeaway from this is I believe non-
24	condensables trapped even on the other side of the
25	squib valve will not impact GDCS flow.
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1	MEMBER ABDEL-KHALIK: I don't think this
2	shows that. I don't think
3	MR. ALAMGIR: We can have a discussion on
4	that.
5	MEMBER ABDEL-KHALIK: this shows that.
6	MR. ALAMGIR: I am very interested in a
7	discussion that can show the other ways.
8	MEMBER BANERJEE: I think I agree with
9	Said that until I mean, first, putting so much
10	credence on TRAC is I know your faith in it is
11	but it's somewhat touchy.
12	MR. ALAMGIR: It's somewhat beyond TRAC as
13	well. As you know me
14	MEMBER BANERJEE: I think you probably
15	need to appeal to some of your old experiments. These
16	have been done. But the other thing is that you
17	certainly shouldn't distribute the void evenly. So it
18	may be that you get the same answer if you don't,
19	but
20	MR. ALAMGIR: We'll put void fraction.
21	The core sorts out what flow regime it is in.
22	MEMBER BANERJEE: I would say
23	MEMBER CORRADINI: Just to end his point,
24	I think what he is saying is spatially you may have 30
25	percent, but he wants what I hear both of these
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58 1 gentlemen saying is you want to think through where it 2 might pocket and look at essentially putting 100 percent, block his air, and watching how it develops. 3 4 MR. ALAMGIR: Correct. 5 MEMBER CORRADINI: That's what they're saying. 6 7 MR. ALAMGIR: After reading your 8 suggestion is empty the line. 9 MEMBER BANERJEE: No, not the whole line. 10 Just empty a part where you might trap a bubble. 11 MEMBER CORRADINI: Yes, right. MR. ALAMGIR: I think I have done it. 12 Ι have --13 MEMBER CORRADINI: We can do it later. 14 We can talk about it later. 15 MR. ALAMGIR: All right. So that was the 16 conclusion. No CCFL effect. 17 It doesn't impede the GDCS flow. And as far as the suggestions, very good 18 19 suggestions. We'll look into these other Don't see any major impact of non-20 sensitivities. condensables for the sensitivity studies I have run. 21 So I'm convinced that it's a good machine. 22 23 The other thing you MEMBER BANERJEE: might want to check is that your CCFL correlation does 24 25 account for elbows. I can give you a couple of **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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      references in the International Journal of Multi-Phase
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 2
      Flow --
 3
                   MR. ALAMGIR: Sure.
 4
                   MEMBER BANERJEE: -- on both experiments
 5
      and analysis of this.
                   MR. ALAMGIR: That would be applicable to
 6
 7
      the elbows you see in the routing diagram.
 8
                   MEMBER BANERJEE: In CCFL conditions.
 9
                   MR. ALAMGIR: Yes. We have a CCFL slide.
10
       We can put it there.
11
                   MEMBER BANERJEE: Right.
12
                   MR. ALAMGIR: We cannot overnight put very
      different CCFL models. We use --
13
                   MEMBER BANERJEE: It would be sort of a
14
15
      JGJ type. I mean --
                   MR. ALAMGIR: Right. Professor Wallis'
16
17
      type of --
                   MEMBER BANERJEE: Yes, it would be the
18
19
      same thing.
                         ALAMGIR:
20
                   MR.
                                       Any
                                             other
                                                     questions?
      Otherwise, I will exit. Thank you very much.
21
                   MEMBER CORRADINI: Thank you.
22
23
                        ALAMGIR: Spotlight goes to Mr.
                   MR.
      Marquino now.
24
25
                   MR. MARQUINO: My name is Wayne Marquino.
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60 1 I work for GE-Hitachi. We have had many -- I think 2 two interactions with ACRS on our LOCA analysis, and now we're back to the full Committee. 3 4 Unfortunately, Dr. Chester Cheun is 5 performing one of his civic duties today. He is going to jury selection in San Jose, so he couldn't be here. 6 I worked on this presentation with him, and it's a 7 8 summary of our containment analysis and a good focus 9 on the non-condensable gas treatment in our analysis. I hope to answer a lot of your questions 10 But you may have a question or two that I 11 today. can't answer and will have to take back. 12 Next slide, please. 13 following this presentation 14 And Jesus 15 Diaz-Quiroz will talk about the vacuum breakers in ESBWR. 16 Next slide. 17 Just as our ESBWR reactor has evolved from 18 19 natural circulation, free separation reactors, through 20 BWRs, through BWRs with steam generators and forced circulation, that's the evolution of the reactor. 21 Well, our containment evolved also. 22 It started with dry containments, and then 23 we went to pressure suppression containments built out 24 25 of free-standing steel vessels. And now we have, in **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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61 concrete-reinforced ABWR and ESBWR, containment 1 2 vessels. In terms of the volumes, they are similar to 3 the Mark II containment. 4 The takeaway from that is that in terms of 5 hydrodynamic loads we are based on test data that has been developed from full-scale Mark III and ABWR 6 tests, so we don't consider that there is any issues 7 8 in that area. And we haven't heard any from the staff 9 or the ACRS. At the beginning of the SBWR program, we 10 were in a test and analysis program description phase. 11 12 And the purpose of this was to define what tests would be necessary to get us through the licensing and 13 certification of the plant with a lot of focus on 14 15 qualification of our computer code. So we looked at what the scenarios are for 16 accident safety analysis, what phenomena would occur, 17 and how we would qualify the models of our codes. 18 Of 19 course, in a lot of areas they are completely based on qualification that we had in place already for the 20 operating plants, but there were some unique tests 21 that were identified as necessary for SBWR. 22 And this slide highlights some of them. 23 We have some full component prototype tests like the 24 25 depressurization valve, the DPV, and the vacuum **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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breaker, which was specifically designed for SBWR to meet a high leak-tight reliability, as you'll see later.

We also have full-scale prototype testing of the heat exchangers, the PCCS heat exchanger used for decay heat removal, and the isolation condenser heat exchanger used for decay heat removal at high pressure.

9 We benefitted a lot from the international 10 participation here. The heat exchangers were built 11 and tested in Italy. We had gravity drain cooling 12 system tests at the GIST facility in San Jose, but we 13 also had tests at a Giraffe facility in Japan that 14 also picked up parts of the containment system and 15 integral containment tests.

The largest scale test facility is the Panda test facility that was built in Switzerland. This is a full height -- again, all of these are full height -- containment test facility, and it was 1/20th of the volume of SBWR, and that's about 1/50th of the volume of ESBWR.

And I want to point out on the bottom left-hand corner is a picture of the Panda facility, and you can see that there are two tanks, and the intent of that test was to force maldistributions of

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non-condensable gas, so that we could see how areas would purge or not purge.

And we've qualified our computer code against these tests. We went through a review by the staff, the ACRS looked at it, and we finally received a safety evaluation report for our application methodology or our procedure for analyzing containment pressure with TRAC.

Next slide, please.

Now I'm going to go through the sequence 10 11 of LOCA and the LOCA analysis for containment pressure 12 calculations. We start with normal operation, and we set up a set of parameters identified on the bottom 13 left at bounding valves. Reactor power, which is 14 15 pretty -- which is required by regulation to consider uncertainties -- we set the ECC pool and the -- at the 16 17 maximum tech spec temperature, the drywell temperature and pressure -- the drywell pressure at a maximum of 18 19 tech spec temperature to maximize the non-condensable gas loading in the containment. 20

The drywell temperature is actually set at 21 22 lower-than-tech-spec maximum, because that а maximizes, again, the non-condensable initially. 23 The wetwell temperature is set at a maximum, 24 and the 25 suppression pool temperature humidity is set

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relatively low to maximize non-condensables, suppression pool levels set low to minimize the heat capacity in the pool.

Reactor pressure is set high to maximize the break flow rate, and the reactor water level is set high to maximize the energy, the blowdown energy in the reactor.

8 On the bottom right, you see some of the 9 modeling parameters that we set at the end of their 10 uncertainty range for the LOCA analysis. So we 11 consider uncertainty in the break flow rate, including 12 the DPV critical flow rate, decay heat, heat transfer, loss coefficient to the passive heat exchanger, the 13 PCC, heat transfer on the PCC, and flow loss in the 14 vacuum breaker. 15

MEMBER ABDEL-KHALIK: I thought you said you biased the drywell temperature low. Is --

MR. MARQUINO: Yes.

MEMBER ABDEL-KHALIK: Is 115 degrees Fbiased low?

MR. MARQUINO: Yes.

22 MEMBER ABDEL-KHALIK: Vis-a-vis 110 in the 23 wetwell temperature? 24 MR. MARQUINO: Yes, 110 is high for the

25 wetwell temperature.

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65 MEMBER ABDEL-KHALIK: And 115 is low for 1 2 the drywell? MR. MARQUINO: Yes. 3 4 MEMBER ABDEL-KHALIK: What is the tech 5 spec limit for the drywell temperature? Present -- well, it's a MR. MARQUINO: 6 bracketed value, meaning we haven't nailed it down 7 8 yet, but we're going to unbracket it in the next 9 revision, and it will be 150 degrees F. So the drywell operates a lot hotter than 10 11 the suppression pool. There is no heat sources in the 12 suppression pool. Next slide, please. 13 As I go through this series of 14 Okay. 15 slides, you will see often on the top left there is a diagram of the reactor building with the primary 16 color-coded to 17 containment, and it's show the distribution of non-condensable gas -- a mix of non-18 19 condensable gas and steam, a mixture that is primarily steam that is colored yellow, hot water colored green, 20 21 and cold water colored blue. So we started with cold water in the 22 pools, hot water in the vessel, no water on the floor 23 of the containment, and now we have a guillotine break 24 25 of the largest pipe the reactor, the main on **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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steamline.

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This will fill the drywell with steam. It's a very energetic blowdown. Will be purging steam and non-condensables through the main vent system into the wetwell pool.

6 During the blowdown, about half of the 7 non-condensables will move from the drywell into the 8 wetwell airspace. Near the end of the blowdown we 9 start GDCS injection, and we fill the vessel with cold 10 water. It takes some time for that water to heat up 11 and begin boiling, so there will be a period of 12 reduced steam flow out of the vessel.

13 MEMBER CORRADINI: And that's in that 14 period of about a quarter of an hour through about 15 three-quarters of an hour.

MR. MARQUINO: Yes.

17 MEMBER CORRADINI: And that's the only 18 time, given your assumptions and how you do the 19 analysis, that the vacuum breakers are lifting, as I 20 understand it from the Subcommittee meeting.

MR. MARQUINO: Yes.

MEMBER CORRADINI: Okay.

23 MEMBER BANERJEE: And the drywell is 24 essentially pretty well mixed. Is that the reality of 25 the situation?

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67 MR. MARQUINO: Yes. During the blowdown 1 2 period, the drywell would be well mixed. 3 MEMBER BANERJEE: The steam jet. 4 MR. MARQUINO: So certainly the area 5 around the break will be mixed. We've got open areas in the top. Any liquid from the break will be 6 draining down into the lower drywell at -- that should 7 8 be pretty well mixed. 9 There are some confined spaces, like the 10 drywell head area, the space between the vessel head 11 and the drywell head. We expect some hideout of non-12 condensable gas there. GDCS pool airspace would probably have some non-condensable gas in it. 13 MEMBER BANERJEE: So when you show this 14 15 vellow, fairly uniform, it's at а stage where everything is sort of mixed, including above the GDCS 16 17 pools and above the vessel. I didn't try and show you 18 MR. MARQUINO: 19 the exact concentration in every TRACG node. I'm just trying to --20 MEMBER BANERJEE: I'm just wondering why 21 22 this is not -- some parts are not light yellow. 23 (Laughter.) He's got two yellows there. 24 25 He is hoping for a MEMBER CORRADINI: **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	light yellow somewhere.
2	MR. MARQUINO: Our standard answer to this
3	is it's a cartoon. When you
4	MEMBER BANERJEE: How do you do these
5	calculations? Do you compartmentalize these and you
6	have some sort of a mixing coefficient between the
7	compartments?
8	MR. MARQUINO: We show the nodes used in
9	the calculation in the DCD. I think there is
10	something like 100 nodes in the drywell GDCS, wetwell
11	airspace, suppression pool, and
12	MEMBER BANERJEE: The real thing is you
13	have to have some sort of a mixing coefficient between
14	the bulk of the drywell and what happens above the
15	GDCS pools in the head regions, right?
16	MR. MARQUINO: Luckily, we have one of the
17	experts on the TRAC mixing that will be M.D., would
18	you like to comment on that?
19	MR. ALAMGIR: Yes. Initially, there will
20	be some trouble in mixing.
21	MEMBER BANERJEE: I thought he did his
22	work on homogeneous nucleation.
23	MR. ALAMGIR: Professor Banerjee, that was
24	25 years ago. Since then, I have done some other
25	work, which may not be as
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(Laughter.)

1	(Haughter.)
2	But there is no assumption of any specific
3	mixing coefficient between compartments. It is best
4	estimate in that sense. You start out with some
5	initial conditions, such as uniform distribution of
6	steam and non-condensable, especially in the
7	MEMBER BANERJEE: So how do you handle
8	the, say, mixing? Because obviously there is there
9	is a barrier to mixing between the top of the GDCS
10	pool and the rest of the containment. Is that
11	MR. ALAMGIR: Let me clarify at the outlet

12 -- outset. Air, which we model, and steam -- they 13 move the same velocity, except that they are different 14 -- they are tracked separately in terms of the mass, 15 but they move at same velocity.

MEMBER BANERJEE: Right.

MR. ALAMGIR: So it's a single fluid inthat sense.

MEMBER BANERJEE: Right. But initiallyyou've got air on top, right?

MR. ALAMGIR: Yes.

22 MEMBER BANERJEE: So now you're going to 23 have the steam going in and --

MR. ALAMGIR: And then it mixes up.

MEMBER BANERJEE: Yes. But when you look

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70 1 at the regions where there are relatively -- like 2 barriers to flow or small openings, it is just a convective component that is going through from one 3 4 mixing cell to the other? Just based on the velocity? 5 MR. ALAMGIR: That's correct. If it has a restriction, it will follow the typical --6 7 MEMBER BANERJEE: There is no eddy 8 diffusivity in this model. 9 MR. ALAMGIR: I had a model. He didn't turn it on. 10 11 MEMBER BANERJEE: All right. MR. ALAMGIR: To be on the conservative 12 I have a total mix-in model based on --13 side. MEMBER BANERJEE: It's all 14 pure 15 convection. MR. ALAMGIR: Pure convection. 16 MEMBER ABDEL-KHALIK: So these results are 17 independent of the break location? 18 19 MR. MARQUINO: There are some 20 sensitivities to the break location that you can see 21 in our DCD results. For example, in the main steamline break, you will see in some later charts I 22 23 There is a point where we think two more. get spillover of -- we fill the whole vessel up to the 24 25 break, and at the point we get spillover that forces **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	flows
2	MEMBER ABDEL-KHALIK: But as far as
3	containment response, are these results independent of
4	break location?
5	MR. MARQUINO: What do you mean
6	MEMBER ABDEL-KHALIK: Pressure history in
7	the containment, non-condensable gas concentration in
8	containment.
9	MR. MARQUINO: Well, the pressures are a
10	little different. You can see the pressures are
11	different depending on the break location.
12	MEMBER ABDEL-KHALIK: Okay.
13	MR. ALAMGIR: DCD has specific break
14	cases, main steamline and so on, for different types
15	of breaks.
16	MEMBER CORRADINI: But, I mean, using that
17	as an example I mean, we are going to have to move
18	on, but using that as an example, though, confuses it
19	because you have it's a high energy line break.
20	You have different enthalpies as well as location. So
21	you're right, they are different, but is it the
22	enthalpy that you are spewing out, or is it the
23	location?
24	I think what Said is asking is, if I just
25	took the same main steamline break, and I put it in
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72 1 three different locations, do you get about the same 2 answer, or do you get wildly different answers? Ι 3 think it's about the same answer. 4 MR. ALAMGIR: Do you mean the location 5 along the line? MEMBER CORRADINI: Yes, or --6 MR. MARQUINO: We can even get a different 7 8 I think we did a sensitivity that we provided answer. 9 the staff on that where we took the -- we put a pipe from the main steamline down into the bottom of the 10 11 drywell, and we ran that case and provided it to the 12 staff. MEMBER CORRADINI: 13 Oh. MARQUINO: And it is little 14 MR. а 15 different, because it will purge the non-condensable gas from the lower drywell. 16 17 Now, we've got some -- in a couple more slides I am going to talk about some of the treatments 18 19 of non-condensable gas that provided we in our nodalization to come up with a maximum containment 20 21 pressure answer. 22 MEMBER BANERJEE: Let me ask you more of a sort of first-order question. Suppose for some reason 23 you were wrong and you had more non-condensables hung 24 25 up in the region above the GDCS -- in the open space **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	in the GDCS pool and at the top region above the
2	vessel. Would it make any difference?
3	MR. MARQUINO: Not much, because the in
4	terms of compressing the airspace in the wetwell, if
5	we have non-condensables in the drywell that's
6	directly going to decrease the containment pressure.
7	So our focus has been making sure that we don't
8	underpredict the amount of non-condensables that got
9	into the wetwell airspace.
10	MEMBER BANERJEE: So having some hop in
11	the drywell here and there doesn't make too much of a
12	difference.
13	MR. MARQUINO: Doesn't make too much of a
14	difference. The reason
15	MEMBER CORRADINI: It does lower the total
16	pressure.
17	MR. ALAMGIR: The figure of merit is the
18	wetwell condition. We don't want the pressure to be
19	too high.
20	MEMBER BANERJEE: Right. You are putting
21	as much non-condensables as possible into the wetwell,
22	right?
23	MR. ALAMGIR: That's correct.
24	MEMBER BANERJEE: Under your current set
25	of calculations.
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1	MR. MARQUINO: Where it has an effect is
2	when we have non-condensables that are getting into
3	the PCC, they will cause the PCC to have to vent. And
4	then, that causes drywell/wetwell differential
5	pressure and drives leakage into the wetwell airspace.
6	MEMBER BANERJEE: If your drywell pressure
7	was a bit higher, what would happen due to non-
8	condensables?
9	MR. MARQUINO: Well, let me get back to
10	that. So if if you have a scenario where over
11	three days you are basically, this is what we have
12	now is over three days we have a continuous venting,
13	because we have continuous radiological gas
14	production. So I think we've pretty much maximized
15	that effect, too.
16	What was your question?
17	MEMBER BANERJEE: I was just saying if you
18	didn't clear the drywell of non-condensables, there
19	was some hanging around in various pockets here and
20	there, what were the implications of that? So from a
21	pressure point of view, potentially because you have
22	less non-condensables in the wetwell, the pressure
23	might be a bit lower.
24	But what does it do to other things
25	PCCS
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75 MR. ALAMGIR: I can answer that question 1 2 in a positive way. If it hypes out and it comes out 3 later, PCCS is self-regulating. So we have shown that 4 it doesn't really matter. It's self-regulating. The 5 system is in balance, and we don't -- our pressure in the wetwell is not affected by this --6 MR. MARQUINO: The best case would be it 7 never comes out. So if we had --8 9 MEMBER BANERJEE: No. But if it comes out 10 slowly over a period of time. So then what happens? 11 Does anything happen to your long-term cooling 12 scenario? MR. MARQUINO: Then it causes differential 13 pressure, because the PCC is venting. But as I said, 14 15 we have some radiological gas production that is being formed anyway and causing this differential pressure 16 17 to be basically maximized over the whole three days. MEMBER CORRADINI: We are going to have to 18 They still have to get to Chapter 18 19 move on. eventually. 20 MEMBER BANERJEE: What would be reassuring 21 if you made mistakes 22 is to hear that in your calculation it doesn't make too much of a difference. 23 MEMBER CORRADINI: I think, though, from 24 25 the Subcommittee meeting what we heard, both by the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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76 1 GEH and the staff and their consultant, was that as --2 to get back to Wayne's answer, which is if you have 3 continual production, then you have this leakage 4 effect, which will build total pressure. 5 But the more you hold it up, the lower 6 your wetwell pressure is. And then, the PCCS, because you will get this bursting effect, you will get this 7 8 oscillatory -- clearing, condensing, clearing, 9 condensing -- it will regulate through. So they would like this to be able to show us that there is less 10 non-condensables in the wetwell. But they can't, so 11 12 they assume the most they can possibly transport. That's the way I understood the explanation. 13 MR. ALAMGIR: Correct. 14 15 MR. MARQUINO: Next slide, please. MEMBER BANERJEE: He is not going to 16 challenge that, Mike. 17 MEMBER CORRADINI: I am just repeating 18 19 what we heard. I just want to make sure I'm hearing it correctly. 20 MR. MARQUINO: The reason I'm showing this 21 slide is because --22 MEMBER CORRADINI: I was going to say, do 23 you really want to show this slide? 24 25 MR. MARQUINO: I'm not going to say

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1	anything about it, except we showed it to the
2	Subcommittee and we didn't have the curve numbers in
3	chronological sequence. So we have revised it, and
4	they are in chronological sequence now and
5	MEMBER CORRADINI: So it's not what?
6	MR. MARQUINO: there's good information
7	on here. I'll only say that we in the prototypical
8	tests and the Panda tests, we investigated all five
9	different possible flow conditions in the PCCS system.
10	Next slide, please.
11	There is two we talked about some of
12	this already. When we refilled the vessel, it's full
13	of it's continuing to get flow from the GDCS pool,
14	and some of the decay heat is going into taking out
15	the latent heat from that water.
16	So in the main steamline break scenario,
17	the steaming from the core during a period will be
18	less than the decay heat. Because the steaming isn't
19	happening, that decay heat is not being removed by the
20	PCC, so you can see on the main steam break plot a
21	deficit between the PCC heat removal and decay heat in
22	the early portion of the event.
23	And then, around 15 to 18 hours, there is
24	a point where we spill cold water out of the break at
25	the top of the vessel. And this causes a little blip
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78 1 and redistribution of non-condensables in our 2 analysis. So we had some hideout non-condensables in 3 4 the drywell head, for example. They become available 5 to the PCC. The PCC has to vent them to the wetwell, and we see a reduction in the PCC heat removal during 6 7 that venting phase. Next slide, please. 8 9 MEMBER POWERS: Before you go on --10 MR. MARQUINO: Yes. 11 MEMBER POWERS: -- could you explain to me how you calculate the radiolytic gas production in the 12 13 core? MR. MAROUINO: We use the same NRC G value 14 that is used for combustible gas calculations. 15 Ι don't have the specific document on the tip of my 16 17 tongue, but I can get it for you before the end of this morning. But we are using a high value for the 18 radiolytic gas production in the analysis. 19 MEMBER POWERS: It's a gas-based G value? 20 MR. MARQUINO: Yes, it assumes boiling in 21 the core. 22 MEMBER POWERS: It seems to me that there 23 has been quite a lot of work on that issue in recent 24 25 years. Is it consistent with what you --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	MR. MARQUINO: Yes, it is, in that we
2	don't have a lower we haven't found anything that
3	would indicate a higher value than what we are using.
4	And I'd like to get some references from you, because
5	we are very interested in justifying a lower value for
6	this.
7	MEMBER POWERS: What if you are not happy
8	with what it gives you? I bet you'd want to hear
9	about it.
10	MEMBER CORRADINI: They are open to the
11	proper information.
12	MEMBER BANERJEE: Is it much higher?
13	MEMBER POWERS: Yes, I would say it's
14	double, depending on your circumstances.
15	MR. MARQUINO: So double the regulatory
16	guidance, or double other tests?
17	MEMBER POWERS: I'm not familiar with the
18	regulatory guidance.
19	MEMBER CORRADINI: I think right now,
20	though, to get to your point, which is we asked this I
21	think in the January meeting, is that they are
22	essentially following the reg guide, which and I
23	don't remember if at the Subcommittee Tom was
24	asking in detail about feeling it was too high. But
25	that's what they're using now is they're using a
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80 regulatory guide value. 1 2 MEMBER POWERS: There has been a lot of water run over the dam since the reg guide --3 4 MEMBER CORRADINI: Right. 5 MEMBER POWERS: So that's I have. Ι guarantee you the reg guide was written -- they did 6 not have the specifics of the ESBWR in mind. 7 8 MEMBER CORRADINI: Yes. 9 MEMBER POWERS: So it will be interesting to look at that. 10 11 MR. MARQUINO: We're --MEMBER POWERS: What kind of dose rate do 12 you have in your atmosphere? 13 MR. MAROUINO: I don't know offhand. I'11 14 15 have to get back to you on that. MEMBER POWERS: In the core region, it 16 must be a pretty ferocious dose rate. 17 18 MR. MARQUINO: Yes, yes. MEMBER POWERS: It must be, what, 30 19 megarad kind of dose rate? 20 21 MR. MARQUINO: It's --Thirty megarads per hour? 22 MEMBER POWERS: MR. MARQUINO: It's a power -- the power 23 density is similar to BWR-6 and ABWR. 24 25 MEMBER POWERS: So you've got, what, about **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

	81
1	38 megawatts?
2	MR. MARQUINO: Fifty-four kilowatts per
3	liter power density.
4	MEMBER POWERS: Okay.
5	MR. MARQUINO: All right.
6	MEMBER BANERJEE: If you doubled your
7	radiolytic gas generation rate, would it matter?
8	MR. MARQUINO: It would matter because it
9	would provide more non-condensables that pressurize
10	the wetwell airspace. And if it lowered it, it
11	we'd pressurize the wetwell airspace less.
12	I think you would have to lower it very
13	significantly before it would affect the whether
14	the PCC was purging or not, and at that point you
15	would see a big reduction in the containment pressure.
16	MEMBER BANERJEE: But raising the gas
17	production rate, would it just mean that you have to
18	I mean, you have your these fans that get turned
19	on and things like that, right? Would you have to
20	turn them on a bit earlier than
21	MR. MARQUINO: It wouldn't affect no,
22	no, it wouldn't affect that. But the and we've
23	done sensitivity studies where we we've turned off
24	the radiolytic gas production. We see like a three
25	psi reduction in the containment pressure between the
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1	value we are using and no radiolytic gas.
2	MEMBER BANERJEE: For what period of time?
3	MR. MARQUINO: Over 72 hours' effect on
4	the maximum containment pressure.
5	MEMBER BANERJEE: So if you doubled it,
6	you'd get three psi more, in rough terms.
7	MR. MARQUINO: Yes, more or less.
8	So our focus to this point has been
9	calculating a pressure at 72 hours, or three days,
10	during which we are coping passively in the plant.
11	After three days, we have some written assistance that
12	we can credit, and I'll get to those in a moment.
13	There are some features in our analysis
14	that are intended to maximize the pressure at 72
15	hours. One is radiolytic gas production, as we
16	discussed. Another is drywell nodalization to mix
17	non-condensable gases. This was established in the
18	initial TRACG review, and then we had some
19	interactions with the staff where, because of design
20	changes, we changed the nodalization and they pointed
21	out that we were retaining some of the non-
22	condensables in the drywell. So we made a change at
23	the staff's suggestion to better mix the GDCS
24	airspace.
25	MEMBER ABDEL-KHALIK: So of the wetwell
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	83
1	pressure of roughly 375 kiloPascal at 72 hours, what
2	is the contribution of the non-condensable gases?
3	What's the partial pressure of non-condensable gases?
4	MR. MARQUINO: I think it's two-thirds to
5	three-quarters of the pressure, and the remainder is
6	the saturation pressure of steam in the pool.
7	MEMBER ABDEL-KHALIK: And of that two-
8	thirds, how much of that is from the radiolytic gases?
9	MR. MARQUINO: It's a pretty small
10	fraction. Less than 10 percent, maybe less than five
11	percent.
12	MEMBER ABDEL-KHALIK: So if that amount
13	were to double, your total pressure would not exceed
14	your design pressure. Is that correct?
15	MR. MARQUINO: We are in this present
16	analysis, no. In the future, I'll show a couple of
17	slides that we're going to be setting the analytical
18	pressure at the design pressure. So in that case it
19	would be above the design pressure. But as I said, I
20	think we have a conservative value for the radiolytic
21	gas source.
22	MR. ALAMGIR: Professor Khalik, 60 psi is
23	the design limit. Three-quarter means it's about
24	45 psi of non-condensable. We just heard three psi is
25	the effect of radiolytic gases. So three versus 40,
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	84
1	45, so that's the effect.
2	MEMBER ABDEL-KHALIK: No. I'm trying to
3	see how much of an error bar do I put on that pressure
4	history line.
5	MR. ALAMGIR: Based on core radiolytic
6	gases?
7	MEMBER ABDEL-KHALIK: Right.
8	MR. ALAMGIR: Based on the numbers, it
9	looks like three out of 45.
10	MEMBER BANERJEE: The other issue that
11	arose, of course, related to stratification and heat
12	conduction in the wetwell airspaces. How sensitive
13	are the results to that?
14	MR. MARQUINO: That's exactly the focus of
15	this slide.
16	MEMBER BANERJEE: Okay. So maybe you can
17	tell us, then.
18	MR. MARQUINO: In general, our philosophy
19	is, if mixing is bad, assume mixing. And if mixing is
20	good, assume no mixing. So
21	MEMBER BANERJEE: Is that the same as
22	stratification?
23	MR. MARQUINO: Yes. So it talked about
24	how we produce mixing in the drywell because it's bad.
25	In the wetwell airspace, mixing is good, and we we
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85 1 block the topic of the airspace from the lower part of 2 the wetwell to force stratification there and keep any 3 steam that leaked in from the drywell up at the top, 4 keep it from condensing on the surface of the pool. 5 MEMBER BANERJEE: All right. MR. MARQUINO: And, similarly, in the 6 7 wetwell pool, we force stratification. We know that 8 when there is steam discharge at a certain elevation 9 in the pool, that does produce good mixing. So early in the event when we are discharging through the 10 11 bottom vents or through the safety relief valve 12 quenchers, we'll have mixing throughout the whole pool, and we credit that. 13 But then, later when the vents start to 14 turn off and the bottom two of three vents are turned 15 off, we block flow from the bottom of the pool to the 16 top, and we force stratification, and that maximizes 17 the temperature of the upper layer of the pool. 18 19 MR. ALAMGIR: Which maximizes the 20 pressure. MR. MARQUINO: 21 Yes. MEMBER BANERJEE: And what about the heat 22 conduction and things like that in this region to the 23 walls? There was some discussion about this, which I 24 25 didn't completely follow, so it --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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86 MR. ALAMGIR: Can I just -- as Wayne said, 1 2 we don't take credit for the drywell -- the wetwell head condensation. 3 4 MEMBER BANERJEE: Right. 5 We did a sensitivity study MR. ALAMGIR: on the effect of condensation on the walls of the 6 7 drywell. Very little impact on some of the results we 8 see here. 9 However, if did take that, we the 10 convection currents due to condensation, that would 11 promote mixing. That's my personal opinion, having worked in mixing area. 12 MEMBER CORRADINI: We are going to have to 13 14 move on. 15 MR. ALAMGIR: Yes. So that's --MEMBER CORRADINI: We've got to get to the 16 17 Chapter 18. So I'm going to ask you to conclude. And if you want to move to the vacuum breakers, that's the 18 19 last thing I think we have to discuss. 20 MR. MARQUINO: Okay. Can I just talk about the last two bullets? If you can back up. 21 The question was about heat transfer. We've considered 22 23 heat transfer for the areas where it has an adverse effect, and that's heat transfer from the drywell into 24 25 the wetwell airspace. So we certainly have those heat **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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transfer paths modeled.

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We also have some paths modeled which would reduce drywell pressure, and that is from the wetwell airspace to the reactor building. We don't have credit for the drywell to reactor building heat transfer. That would be beneficial, but we don't think it's a significant effect anyway.

Next slide?

9 MEMBER ABDEL-KHALIK: Mr. Chairman, I do 10 understand the pressures of time, and I am sympathetic However, early on in the presentation we 11 to that. 12 spent 10 minutes listening to people telling us how many RAIs are open and how many have been closed, 13 which was totally vacuous in terms of information 14 15 transfer.

16 So perhaps we ought to be sort of more 17 insistent on, you know, value added in these 18 presentations in the future.

19MEMBER CORRADINI: Point taken. But I20don't want to get -- and put Chapter 18 at a loss of21time.

22 MEMBER ABDEL-KHALIK: I totally 23 understand, totally sympathetic to the concern. But I 24 would like to register sort of a complaint about the 25 nature of earlier presentations, inasmuch as it takes

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	88
1	away from the time available to the Committee to
2	discuss relevant issues.
3	MS. CUBBAGE: I understand. And if
4	additional detail is needed on these topics, I think
5	it would be more appropriate for a Subcommittee. We
6	were trying to respond to the Committee's request to
7	address it here today.
8	MEMBER BANERJEE: But we need to write a
9	letter, right, Mike?
10	MEMBER CORRADINI: If you don't want to,
11	we don't have to.
12	MS. CUBBAGE: We are not requesting at
13	this time that the Committee prepares a letter that
14	says that these issues are closed, because they are
15	not closed.
16	MEMBER CORRADINI: I think the key thing
17	is that these are all open items that we are hearing
18	information on and as they progress towards answering
19	the staff's questions.
20	MEMBER ABDEL-KHALIK: Okay. Thank you.
21	MR. MARQUINO: You have the handouts. You
22	can read these slides. The point of this slide is in
23	the Rev 5 DCD we are going to be maximizing the
24	drywell-wetwell leakage, which will put the
25	containment at its design pressure, within like one or
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1       two percent.         2       The point of doing that next slide         3       is to provide additional margin to the utility for         4       their surveillance testing, to make sure that within         5       the measurement accuracies of this leakage flow we         6       will have some operating margin.         7       Next slide?         8       MEMBER BANERJEE: Now, this is very         9       interesting, actually. I guess at the Subcommittee         10       meeting this wasn't presented.         11       MEMBER CORRADINI: We had this.         12       MEMBER BANERJEE: We had this?         13       CHAIRMAN SHACK: It doubled it basically         14       over the four.         15       MEMBER BANERJEE: Ah, okay.         16       MR. MARQUINO: One square centimeter, two         17       squared centimeters.         18       MEMBER BANERJEE: Yes. We had it for one.         19       Okay. So now you have gone to four. Because I         10       hadn't         21       MR. MARQUINO: We are going to two.         22       MRMBER BANERJEE: Two, okay.         23       MR. MARQUINO: Next slide?		89
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RTNSS regulatory treatment of non-safety system.

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For the containment, we refilled the pools, recovered the heat exchangers, and we also -that provides initially a good reduction in pressure. But the pressure would rebuild basically back up to the same level once boiling begins in the pool compartment.

8 То achieve sustained reduction in а 9 pressure, we turn on small fans that are in the vent and that circulates the non-10 line of each PCC, 11 condensable gas around, so that instead of the heat 12 exchanger being blanketed along a length of the two with non-condensable it has the same non-condensable 13 fraction over the whole length of the two. 14

15 We had some questions from the Subcommittee about whether the fan was going to have 16 17 anything to pump. The fan always has something to pump. It will either be pumping steam and circulating 18 19 steam around or a non-condensable and steam mixture.

Well, 20 MEMBER BANERJEE: there was а concern as to whether it would pump around liquid. 21 Because obviously you get some 22 That was the issue. condensation during this process, if there was steam 23 going through the heat exchanger, and there would be 24 25 Now that has to be separated out before some liquid.

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1	the pump.
2	MR. MARQUINO: Yes. And the vent location
3	in the lower drum is designed to prevent liquid, as
4	much as possible. But there might be some liquid
5	droplets that
6	MEMBER BANERJEE: Carryover, yes.
7	MR. MARQUINO: that would be going
8	through the fan, yes.
9	MEMBER BANERJEE: Because that was not
10	meant to separate things under forced convection
11	conditions, right? I mean, it is basically an
12	impacter from what I see.
13	MR. ALAMGIR: The concern was whether the
14	fan will function properly with such droplets.
15	MEMBER BANERJEE: Yes.
16	MR. ALAMGIR: Is that
17	MEMBER BANERJEE: That's correct. I think
18	one might have
19	MEMBER CORRADINI: I don't think you're
20	going to want to answer this on the fly.
21	MEMBER BANERJEE: But that was sort of the
22	concern at the Subcommittee meeting, if I remember, if
23	there is some liquid drawn in, what would happen.
24	Maybe the liquid can't be drawn in. You could
25	convince us of that. But if it could be drawn in,
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1	then how would it affect the operation?
2	MR. MARQUINO: I am trying to give the
3	people that aren't on the Subcommittee a brief
4	overview. The other RTNSS system is passive
5	autocatalytic recombiners, a catalyst that combines
6	hydrogen and oxygen, and they would take out this
7	radiolytic gas source that is compressing the wetwell.
8	We only credit them at 72 hours, but
9	realistically they'd be working over the whole over
10	the whole duration of the event, or at least from four
11	hours to 72 hours also.
12	So get a good reduction. We could stay in
13	this mode indefinitely, but we also are documenting
14	the post-LOCA recovery.
15	Next slide?
16	And in the post-LOCA recovery, we'll use
17	an active system that takes water out of the
18	suppression pool, puts it through a heat exchanger, a
19	pump, and then initially returns it to the suppression
20	pool. After cooling the suppression pool down and
21	reducing the energy in the containment, we put it into
22	a vessel injection mode, and there that's the
23	eight-day curve.
24	The second hash from the right you see a
25	reduction to almost atmospheric pressure when we go to
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vessel injection.

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2 CHAIRMAN SHACK: Since your PARS is a passive system, why don't you credit it earlier? 3 4 MR. MARQUINO: Because it would make it 5 high regulatory oversight in a tech spec system. MEMBER CORRADINI: That's what I thought. 6 MR. MARQUINO: So we're continuing to work 7 8 with the staff to answer questions. There is some --9 there is some people involved that are doing a very thorough review of our calculations, and that's good. 10 11 We want to get them the data they need to do 12 alternate calculations, and we want to provide you the data from our calculations. The staff has done audits 13 in this area. 14 15 Thank you very much for your attention. MEMBER CORRADINI: Thank you. 16 17 We are going to move on to vacuum breakers briefly. 18 19 MR. DIAZ-QUIROZ: Thank you, and my name is Jesus Diaz-Quiroz. I'm from GE-Hitachi, and I will 20 be giving a quick summary of the vacuum breaker, some 21 qualification, going through some of the results, and 22 also the logic involved in isolation valvage which is 23 placed upstream of that valve. 24 25 Here on the slide it's quite wordy, but **NEAL R. GROSS** 

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94 1 the vacuum breaker isolation valve demand logic is --I want to make it clear that this valve is independent 2 of QDCIS, which is our safety-related control system, 3 4 and any other control systems. 5 demand logic is processed It's \_\_\_ on similar ATWS SLIC NUMAC-type components. That's a lot 6 to do with common cause mode failure. We want to make 7 8 sure that's not -- doesn't come into play here. 9 Each vacuum breaker isolation valve logic 10 is independent of the others, and there's a total of three -- of course, three vacuum breakers. There are 11 12 four divisions of instruments per vacuum breaker isolation valve, and vacuum breaker, that is, too, as 13 well. 14 15 This provides or prevents inadvertent closure of that value, the isolation valve. It also 16 17 provides N minus two requirements, so you can have one division off service and still be able to survive 18 19 this. 20 MEMBER STETKAR: Because of the time 21 here --MR. DIAZ-QUIROZ: Would you like me to 22 just go ahead --23 24 MEMBER STETKAR: Let me just ask you a 25 couple of questions. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	MR. DIAZ-QUIROZ: Sure, go ahead.
2	MEMBER STETKAR: Two quick ones. Number
З	one, I seem to recall reading that those vacuum
4	breaker isolation valves are solenoid-operated valves
5	and they fail closed. Is that correct?
6	MR. DIAZ-QUIROZ: No, no, no. That was an
7	earlier preliminary design, and which was
8	subsequently being changed out.
9	MEMBER STETKAR: So do they
10	MR. DIAZ-QUIROZ: They do not
11	MEMBER STETKAR: What type of valve is it?
12	MR. DIAZ-QUIROZ: At this point, we've
13	chosen preliminary valve. It's a triple-offset
14	butterfly valve. It does not close. It is not a fail
15	close. It's fail as is.
16	MEMBER STETKAR: Fail as is, okay.
17	MR. DIAZ-QUIROZ: Fail as is. And it's
18	pneumatic, of course, nitrogen operated.
19	MEMBER STETKAR: Nitrogen operated.
20	MR. DIAZ-QUIROZ: Yes.
21	MEMBER STETKAR: Okay, great. Thank you.
22	And it's DC power supplies for the solenoids?
23	MR. DIAZ-QUIROZ: Yes.
24	MEMBER STETKAR: From where?
25	MR. DIAZ-QUIROZ: This would be safety-
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1	related power as well.
2	MEMBER CORRADINI: And one last just
3	clarification. It's upstream of the actual
4	MR. DIAZ-QUIROZ: Right. And we'll show
5	that a little bit
6	MEMBER CORRADINI: That's fine.
7	MR. DIAZ-QUIROZ: And, again, this logic
8	does not attempt to quantify the leakage of the vacuum
9	breaker, but to determine that it is leaking, and
10	that's based on sensing a differential temperature,
11	which I will quickly discuss.
12	I will quickly go in here the primary
13	demand logic, single, will be the result of a
14	temperature differential between the vacuum breaker
15	cavity, which I will show in the later figure here.
16	And when the wetwell exceeds when that differential
17	exceeds a predetermined setpoint, how long would it
18	not be bypassed, that division. Two out of four
19	divisions, of course, for the bump conditions. And
20	also, two out of four divisions in which provided
21	by LOCA permissive.
22	Next slide, please.
23	MEMBER BROWN: That's that last one about?
24	MR. DIAZ-QUIROZ: If there's a LOCA
25	permissive, in this case you want to make sure that
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1	you are in the LOCA. So we'll go into what that is.
2	MEMBER BROWN: So these valves only
3	operate if you're in the LOCA condition.
4	MR. DIAZ-QUIROZ: Right. You don't want
5	to isolate during normal conditions.
6	Next slide, please.
7	Here again, there is also secondary demand
8	logic, which is similar to what which is the same
9	logic features as the primary logic, but in this case
10	there are four proximity probes on the seat of the
11	vacuum breaker, each 90 degrees apart, which indicate
12	not full closed. And there is also one proximity
13	probe on the stem, which I'll point out on the figure,
14	which indicates a full open.
15	And the vacuum breaker isolation valve
16	will close automatically if it sends us a differential
17	temperature between the again, that cavity between
18	the vacuum breaker and the isolation valve and the
19	drywell. And, of course, that has to be exceed a
20	predetermined setpoint. And along with that as well
21	there is that same LOCA permissive, and the proximity
22	probes would indicate the vacuum breaker not full
23	closed.
24	There is there are provisions for
25	manual control, so that the operator in the control
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98 room can open and close these individual vacuum 1 2 breaker isolation valves as needed. And these manual controls are independent of the primary and secondary 3 4 logic. 5 MEMBER BROWN: Even if there is a signal to close it, the operators can open it. 6 7 MR. DIAZ-QUIROZ: The operators -- yes, 8 are allowed to do that, yes. 9 Next slide, please. 10 Here --MEMBER BROWN: Can I just mention one --11 12 if you didn't notice it, in Wayne's slides on page 4 there is an actual photograph of one of these. 13 MR. DIAZ-QUIROZ: Yes. Sorry I failed to 14 15 mention that. It's fairly vague, as you've noticed. It's got a footprint of about two and a half, two and 16 a half --17 CHAIRMAN SHACK: We call it a manhole. 18 19 (Laughter.) I'd like to quickly 20 MR. DIAZ-QUIROZ: point out where -- this is the isolation valve, this 21 is the vacuum breaker itself. The temperature sensors 22 that would give that input into the logic would be 23 located in the drywell next to the outlet screens 24 25 inside the cavity which is created by the vacuum **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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99 1 breaker and isolation valve and in the wetwell itself. 2 I also would like to point out near this 3 area that's highlighted where the elastomeric EPDM 4 seat is shown here, and the proximity probe -- again, 5 there is four of those. They are 90 degrees located apart, and another proximity probe that indicates full 6 open is located on the upper bearing stem here. 7 8 MEMBER SIEBER: The isolation valve is not 9 leak tight, right? 10 MR. DIAZ-QUIROZ: Not leak tight, you said? 11 12 MEMBER SIEBER: Yes. MR. DIAZ-QUIROZ: Yes, it would have to be 13 same specifications as the vacuum breaker 14 to the 15 itself. MEMBER SIEBER: No seat? 16 MR. DIAZ-QUIROZ: Right, right. It has no 17 -- it has no soft seat, if that's what you're asking. 18 19 MEMBER SIEBER: Yes. MR. DIAZ-QUIROZ: Right. It's this type 20 can give more specifics about the actual 21 we preliminary design of that, if you'd like. 22 23 MEMBER SIEBER: That's all right. Ι understand the drawing. Thank you. 24 25 The drawing of MR. DIAZ-QUIROZ: Yes. **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	course is
2	MEMBER CORRADINI: A drawing.
3	MR. DIAZ-QUIROZ: a drawing.
4	Next slide, please.
5	MEMBER STETKAR: Jesus? Could you go back
6	to that other
7	MR. DIAZ-QUIROZ: Sure.
8	MEMBER STETKAR: slide, just for a
9	second? Because we're really tight on time.
10	MR. DIAZ-QUIROZ: No, that's fine.
11	MEMBER STETKAR: The damper piston
12	MR. DIAZ-QUIROZ: This?
13	MEMBER STETKAR: Yes. There's a couple of
14	bearing surfaces there. Have you looked at the I
15	mean, you're paying a lot of attention to the seats
16	and things like that. We're concerned about the valve
17	not reclosing. If those things if there's any kind
18	of interference there, the valve is not going to
19	reclose.
20	MR. DIAZ-QUIROZ: Right. And later on
21	there's a slide that summarize some of the
22	MEMBER STETKAR: Okay.
23	MR. DIAZ-QUIROZ: some of the testing,
24	which was actually placed on the stem and such
25	MEMBER STETKAR: On the stem?
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101 MR. DIAZ-QUIROZ: On the stem all 1 2 throughout the inside of the terminals of the valve, 3 and it was cycled quite a few times. 4 MEMBER SIEBER: You can't lose 5 concentricity by grit and other foreign matter. MR. DIAZ-OUIROZ: Right. To bind it in 6 7 that --8 It could foul up the MEMBER SIEBER: 9 bearings. 10 MR. DIAZ-QUIROZ: Right. So grit was used for that. 11 12 LOCA temperature evaluation was conducted to be able to look at what should -- that temperature 13 differential should be, and that was looked at for 14 large, medium, small break LOCAs. 15 LOCA permissive -- the LOCA permissive 16 17 signal has been established drywell temperature -difference, that is. Here it is shown as just actual, 18 19 but it is really a difference, of greater than or 20 equal to 90 degrees C. So that would be the permissive itself. That would be the temperature 21 difference. 22 23 This will enough margin to cover normal plant operation. Of course, again, we don't want to 24 25 isolate these valves during normal operation. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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This has been shown to give a reasonable response -- for the large to small break LOCAs, halfsecond to 50 seconds. And for the very small, in this case for instance a standby liquid control line break, 600 seconds.

And here we show that delta. How is that calculated? Again, it's just drywell temperature minus the wetwell. And this delta T throughout the vent from initial blowdown to 72 hours varies from 90 degrees, the high 225 degrees.

And the next slide will give a summary of 11 12 -- for each type of break that was looked at and what that delta, as -- from initial -- around initial 13 blowdown to 72 hours, and you can see, again, bottom 14 drain line break, which is the BDL row there, the 15 second-to-the-last row there, shows the 90 degrees. 16 17 And you can see at 72 hours you get this 25 degree delta for most of the events. 18

When the vacuum -- how do you isolate again? What's the signal that's given to the vacuum breaker isolation valve? And, again, it's -- we're looking at the temperature in the cavity as it approaches the temperature in the drywell. That means it's leaking, it's heating up inside.

So that, again, is -- it's the difference

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1 between the cavity and the wetwell has to greater than 2 or equal to some percentage of that difference between 3 the drywell and the wetwell, which will give that 4 signal. Right now that percentage is around 80 5 percent, and it is yet to be finalized. Next slide, please. 6 This is a very busy slide here, but this 7 8 discusses the sealing surfaces of the vacuum breaker. 9 And, again, it's the elastomeric seal, so on and so 10 on. 11 In the test program, it was went 12 through aging degradation. Leak tightness was simulated with the LOCA debris. It was fully tested 13 and qualified, and it was confirmed. 14 15 Some of the sensitivities that went along with that were various pieces of chips were put 16 between the soft seal and the hard seal, from 12 to 50 17 mils, and this showed that -- and I'll show a later 18 19 curve that shows the summarized test results, that the leak caused by that was well under what we set out to 20 be the acceptable leakage. 21 Again, this last bullet just discusses 22 proximity probes. 23 Next slide? 24 25 MEMBER SIEBER: Again, these -- I asked **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

104 about grit on the pistons. These are all grit on the 1 2 sealing surfaces. 3 MR. DIAZ-QUIROZ: On the sealing surfaces as well. Right, it was --4 5 MEMBER SIEBER: I didn't see anything here that says you actually looked at grit on the piston. 6 7 MR. DIAZ-QUIROZ: Right. And I apologize 8 for the slide. It's not -- does not encompass all of 9 the test reports. I believe those were made available 10 to the staff, and that goes into more detail as to how it was introduced into the vacuum breaker. 11 MEMBER ABDEL-KHALIK: How big is the 12 clearance on that stem? 13 14 MR. DIAZ-QUIROZ: I'm sorry. The 15 clearance? MEMBER ABDEL-KHALIK: How big is 16 the clearance on the stem? 17 MR. DIAZ-QUIROZ: Well, and that's -- I 18 don't have that detail. 19 MEMBER ABDEL-KHALIK: So if the thing is 20 tilted --21 22 MR. DIAZ-QUIROZ: It's a bearing. It has to give it a -- it's tight. I don't have that number. 23 Next slide, please. 24 25 Here, this is a -- this quickly summarizes **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 the test results where you can see A through C shows 2 the leakage for range of differential pressures across 3 the vacuum breaker. And you can see they are very 4 low. Only do you start seeing any leakage at E here, 5 curve E, where we actually introduced that grit. So that actually did cause some leakage. 6 7 But as you can see, the acceptable --8 maximum acceptable leak rate here --9 CHAIRMAN SHACK: Is that in the days when 10 you had a 1 cm area as the maximum? MR. DIAZ-QUIROZ: No. This maximum here? 11 CHAIRMAN SHACK: Yes. 12 MR. DIAZ-QUIROZ: No, this is actually 13 based on two-tenths of that -- of one centimeter 14 15 squared, so .2 centimeters squared. That's that That's what that's based on. So it's much 16 leakage. lower than the one previously used and the two now 17 18 that's going to set the level -- maximum bypass 19 leakage. then, thereafter, it went 20 through And reliability testing. It was cycled 10,000 cycles, and 21 through that cycling leakage did increase, but it did 22 stay well below that acceptable leakage that was 23 established. 24 25 And the other curves here -- F prime, F **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

106 1 double prime, are just -- the surfaces were cleaned 2 and such, so --CHAIRMAN SHACK: How many cycles did you 3 4 say you had after the grit? 5 MR. DIAZ-QUIROZ: Ten thousand. CHAIRMAN SHACK: Ten thousand. 6 MR. DIAZ-QUIROZ: So, and then, thereafter 7 8 -- so that's the top curve right there. And then, 9 F prime, F double prime shows after they were cleaned out, and the soft seal itself was pasted back on. 10 Ιt 11 was removed and cleaned and put back on. So that did improve its performance, but, again, that was --12 MEMBER SIEBER: When you qualified the 13 soft seal, did you do Arrhenius temperature testing 14 15 and radiation testing? MR. DIAZ-QUIROZ: Yes, it was aged thermal 16 radiation, yes. And that's included in the test 17 reports as well. 18 MEMBER SIEBER: Nuclear radiation or --19 you said thermal radiation. 20 MR. DIAZ-QUIROZ: It was both. Sorry. 21 22 MEMBER SIEBER: Thermal aging and radiation. 23 MEMBER BANERJEE: In some of these curves, 24 25 the leak rate goes down as the differential pressure **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

107 increases. Why does that happen? 1 2 MR. DIAZ-QUIROZ: Right. And that 3 would -it's 4 MEMBER CORRADINI: That's how 5 designed. MR. DIAZ-QUIROZ: Right. From a soft 6 7 sealed point of view, yes, they -- the greater the 8 differential pressure, the more you clamp down on 9 that, so you create a tighter seal. That's the reason 10 why you see it. But as you can see, it does go down, 11 but it doesn't increase dramatically. 12 MEMBER BANERJEE: How it goes up, E. MR. DIAZ-QUIROZ: I'm sorry? 13 MEMBER BANERJEE: E goes up. 14 15 MR. DIAZ-QUIROZ: E goes up, right. And E is, again, where grit was adjusted and went through 16 several cycles. And in that case, you had -- right, 17 it goes up. So it seems kind of at odds. I would 18 19 have to --MEMBER BANERJEE: Yes. You'd have to look 20 at this and try to understand --21 22 MEMBER CORRADINI: This is a curve from the test program report you sent us, Jesus. 23 MR. DIAZ-QUIROZ: Right. 24 25 MEMBER CORRADINI: So you won't have to go **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	back and
2	MR. DIAZ-QUIROZ: It's a curve that
3	consolidates all of those results there.
4	CHAIRMAN SHACK: I was going to say, if we
5	look at the data, we might see some interpretation of
6	how you drew the curves.
7	MEMBER CORRADINI: I was going to say,
8	there might be some scatter.
9	MR. DIAZ-QUIROZ: Right, right. There
10	will be scatter, right. So this is an interpretation
11	of that data. Right.
12	In conclusion, I just I would like to
13	add that this vacuum breaker was well tested. It was
14	it did go through some rigorous testing, and now
15	that, of course, it has been clearly identified and it
16	always has been so that this is a critical component,
17	leave that as this isolation valve to assure that any
18	leakage will be stopped if it does occur.
19	MEMBER MAYNARD: I have a comment on your
20	isolation valve.
21	MR. DIAZ-QUIROZ: Sure.
22	MEMBER MAYNARD: And it's a very large
23	butterfly valve. I have experience with butterfly
24	valves. It's typically difficult to get them to set
25	up for real good leak-tight isolation. I think that
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1	might be a real maintenance issue and a testing issue.
2	MR. DIAZ-QUIROZ: Right.
3	MEMBER SIEBER: That's not even built like
4	a regular butterfly valve.
5	MR. DIAZ-QUIROZ: Right. It's
6	MEMBER SIEBER: It doesn't have a seat.
7	It's a clearance fit.
8	MR. DIAZ-QUIROZ: Right.
9	MEMBER SIEBER: It's just flowing down and
10	the air was going through it.
11	MEMBER MAYNARD: I understand. For what
12	we're talking about, for the size of this thing and
13	for the leak rate that we are trying to maintain and
14	stuff, I think it could be a maintenance issue and
15	trying to keep that within the specifications or
16	MEMBER SIEBER: I don't know that we have
17	a spec for that.
18	MR. DIAZ-QUIROZ: Yes. We have taken it
19	under consideration.
20	MEMBER ABDEL-KHALIK: The diameter of the
21	pipe in which this butterfly valve is located is
22	MR. DIAZ-QUIROZ: Is approximately 24
23	MEMBER ABDEL-KHALIK: Inches.
24	MR. DIAZ-QUIROZ: inches.
25	MEMBER ABDEL-KHALIK: Right. Which means
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1	that for two centimeters squared leakage area it's a
2	tenth of a millimeter.
3	MR. DIAZ-QUIROZ: Right. It's not
4	right. So you have a hard seat and a soft seat to
5	assure that, and this disk itself the vacuum
6	breaker disk itself is about 200 pounds itself. So
7	it's a very large, heavy disk.
8	CHAIRMAN SHACK: Right. We were worried
9	about the butterfly valve.
10	MR. DIAZ-QUIROZ: And the butterfly
11	right, right. And this is right, because it's the
12	backstop. Right. It doesn't have a seat. It's sort
13	of a I can go into more details as to the selection
14	that we went through, but
15	MEMBER BLEY: Did you do testing on the
16	leakage of the butterfly valve?
17	MR. DIAZ-QUIROZ: No, that's vendor
18	provided.
19	MEMBER BLEY: That's not going to come
20	anywhere near the
21	MR. DIAZ-QUIROZ: No.
22	MEMBER BLEY: If the check valve is not
23	doing what it's supposed to do, this isn't going to
24	help much unless it's wide open.
25	MEMBER SIEBER: Well, it prevents the
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111 check valve from lifting. 1 2 MEMBER STETKAR: That's right. It will sit there and 3 MEMBER SIEBER: 4 maybe flutter a little bit, but if --5 MEMBER STETKAR: But if it's stuck open, it's not going to --6 MEMBER SIEBER: That's really what the 7 8 purpose is. 9 MEMBER STETKAR: -- it's not going to 10 isolate it. MEMBER MAYNARD: The 2N series might keep 11 12 you --MR. DIAZ-QUIROZ: And with that --13 MEMBER CORRADINI: Thank you. 14 15 Will GEH proceed on with Chapter 18, or will we go back to the staff? 16 Actually, while they're 17 MS. CUBBAGE: setting up, I think Mike Snodderly would like to make 18 19 a few comments. 20 MEMBER CORRADINI: Sure. MS. CUBBAGE: And he can go ahead and 21 start while --22 23 While people are MR. SNODDERLY: Yes. getting set up, I think I just wanted to mention two 24 25 things. Well, first of all, I wanted to say I thought **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

that this was the best presentation GE has given on these issues, on the containment issues, and we're following all of those.

4 There's only two issues that I've heard 5 come up at the Subcommittee and this morning that the staff is not pursuing that the Committee has shown 6 7 some interest in, and I'll just mention two of those. 8 One is, as Dr. Powers mentioned, radiolysis. They 9 are using the G values that are in Reg Guide 1.7, Revision 2. It's the one that Richard Guito at Sandia 10 National Labs helped develop. 11

12 That G value is a function of pH, so if 13 the pH is below four, the radiolysis rate could be 14 doubled. But we haven't seen evidence that would 15 suggest that we believe it would be that low, so we 16 are comfortable with that -- with the G value that 17 they have chosen. So the Committee might want to 18 bring that up.

19 The only other thing was whether the wetwell ceiling was modeled adequately or not. 20 We 21 feel that the modeling of the ceiling was conservative and is acceptable. So those are -- and we -- I did 22 23 plan to be here this evening and tomorrow during the letter-writing session, if 24 you want to discuss 25 anything else.

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1	And I will just quickly, just to address
2	Dr. Khalik's you know, we knew that we wanted GE to
3	go first, and we apologize for having some trouble
4	getting everybody up here. And the staff was going to
5	go last, because we it was more important for them
6	to get you that information and not to have us update
7	on the stats. So we apologize for that, but that was
8	not our intent.
9	Okay? Thank you.
10	MEMBER POWERS: Mike, I understood from
11	General Electric that they were using a gas-phased G
12	value.
13	MR. SNODDERLY: Yes.
14	MEMBER POWERS: And I don't understand how
15	a gas-phased G value would be affected by pH.
16	MR. SNODDERLY: Well, if the pH was lower,
17	then that gas value could be as high it could be
18	double, based on literature searches that we have
19	done. So, in other words, if the pH in the RCS was
20	lower, then that would cause greater gas production.
21	And that's why I was saying that we were
22	comfortable with the value that they used based on Reg
23	Guide 1.7, Rev 2. But it could be higher if the pH
24	was lower.
25	MEMBER POWERS: I'll look at the reg
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1	guide.
2	MR. SNODDERLY: Okay.
3	MS. CUBBAGE: And if there is a concern on
4	that, please let us know, and we can pursue that.
5	MR. STATTEL: Good morning. My name is
6	Richard Stattel, and I want to mention I'm a software
7	engineer as my job title. My background is mainly
8	with I&C engineering, and I am currently assigned to
9	the HFE team of the ESBWR project.
10	And I mention this because this team is a
11	very diverse team, and it has been a real exciting
12	opportunity to work with them. And I'm very pleased
13	to represent this team and their ongoing activities,
14	because this is really the up-front activities of the
15	overall plant design, as you will see.
16	So the first slide here we have is
17	basically the conceptual design that we have for the
18	control room design, and there is just a couple of
19	points that I would like to mention point out on
20	this diagram.
21	The safety-related systems are we have
22	identified those. The safety-related systems, we have
23	identified some dedicated displays if I can figure
24	out how to work this. Right here we have some four
25	the four divisions of safety-related channels are
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right here, and we also have a backup set of safetyrelated displays right here.

And we provide redundancy on these touch screens. And for the non-safety-related electronic we have the wide panel displays, which are a modedependent display, which is a departure from our predecessor design, the Lungman design.

8 The main reason for that is, for those of 9 you who have been at the old powerplants, typically if you walk into a control room and they're operating in 10 mode 5 and refueling operations, it's very common for 11 12 an operator -- what's presented in front of him, about 90 percent of what's there is really meant for the 100 13 percent power operating reactor. And it makes -- it's 14 15 a challenge for the operators to really make the right decisions and to do the right things in those non-16 standard modes that the plant really wasn't originally 17 designed for. 18

So with the new technology, we are able to create some very custom displays and present the operators with the information he needs for the operating mode of the plant.

We have sit-down consoles set up, and you can see that the -- on the non-safety displays here we have a large variety, and these are doubled up for the

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1	purpose of supporting use of electronic procedures,
2	and for some plant automation features. Okay? So
3	MEMBER SIEBER: If an operator wants to
4	open a valve, what does he do?
5	MR. STATTEL: What does he do?
6	MEMBER SIEBER: Take a mouse and put the
7	arrow on a on a schematic on the screen and hope he
8	clicks it without going to the wrong one?
9	MR. STATTEL: Well, what you say is true,
10	and a lot of the different methods for operating
11	equipment are being considered during the HFE process.
12	MEMBER SIEBER: Have you decided what
13	method you are going to use on this yet? Whether it's
14	going to be mouse, typing in? I notice there is no
15	MR. STATTEL: There are actual right,
16	there is no real hard switches in the design.
17	MEMBER SIEBER: Screens and keyboards.
18	MR. STATTEL: Pretty much what we're
19	coming up with. And these design features haven't
20	really been locked in, but pretty much what we're
21	coming up with is there will be alternate methods of
22	operating equipment. Many of the system mimics will
23	have dedicated portions of the display that would
24	ensure that interlocks are met prior you know, to
25	help the operator to determine the correct course of
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action when operating a valve or a pump.

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2 And then, also, we have some integration 3 we are working on some integration efforts for 4 plant automation, such that the procedures that the 5 operator is following on perhaps the upper display, he would be able to actually observe the equipment 6 7 operating the display, actually on lower and 8 alternately on the large-panel displays that are in 9 the background there, to make that visible to everyone in the control room, because it's really a team effort 10 and that's -- the idea is to maximize the visibility 11 12 to the shift supervisor and to all of the operators that need to be aware of plant status. 13 MEMBER SIEBER: So the 14 answer to my 15 question is yes. MR. STATTEL: Yes. Yes, it is. 16 17 MEMBER SIEBER: Thank you. (Laughter.) 18 19 MR. STATTEL: Okay? Okay. So just a few This is truly a human-20 of the program highlights. centered design, and that's the basis of the program. 21 Can I interrupt? 22 MEMBER BROWN: Do you have any experience with the touch screen controls and 23 all of the rest that --24 25 MR. STATTEL: Actually, me personally, I **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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118 do. 1 2 MEMBER BROWN: Do we ever get plants in service where you have this complete layout of nothing 3 but digital control --4 5 MR. STATTEL: Well, actually --MEMBER BROWN: -- microprocessors --6 MR. STATTEL: -- the ABWR design --7 8 MEMBER BROWN: -- is able to start these things? 9 The actual ABWR design does 10 MR. STATTEL: And they operate equipment 11 use plant automation. 12 using touch screens with interlocks and confirmation. So there is experience there. 13 There is a limited amount of experience in 14 the domestic plants, the operating plants -- some of 15 the digital upgrades that have been performed and 16 post-accident monitoring systems, and actual turbine 17 control systems using the Mark 6E use this technology. 18 19 So but the whole scale, where everything is operated electronically, with -- using 20 21 the displays, this is something that is rather new to the U.S. industry. But it is widely used in the 22 23 foreign plants. MEMBER BROWN: What kind of analyses do 24 25 you do to make sure that you have the failure -- I NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	mean, failures of hard switches and things like that
2	are well characterized for the most part, but there is
3	you are now going through multiple you are using
4	software effectively to go and control every component
5	in the plant. Is that correct? That's what I got out
6	of your statement.
7	MR. STATTEL: That is correct.
8	MEMBER BROWN: Out of your question.
9	MR. STATTEL: That is correct.
10	MEMBER BROWN: He answered yes.
11	MR. STATTEL: Well, the failure modes
12	differ from the old designs with the hard switches.
13	However, with the with the new designs, we are able
14	to design in redundancy. As you can see, basically
15	every piece of equipment can potentially be operated
16	from every one of the displays that is there in the
17	control room.
18	So certainly a failure of a display or a
19	driver for that display, a node box for that display,
20	we consider that in the failure modes and effect
21	analysis.
22	As far as control system redundance, the
23	Mark 6E, which is the primary backbone for the
24	controls on the ESBWR, has a basically, a three-
25	channel redundancy scheme. So that we believe that
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120 1 the redundancy that is established there really covers those failure modes, to a much greater extent than 2 3 is --4 MEMBER BROWN: So all you're doing is 5 saying you have got redundancy, such that if something fails you have got something else with which to 6 7 operate it, but not necessarily the effect of а 8 failure on inadvertently activating or starting a 9 pump, opening a valve, turning something on or off, 10 what have you. 11 I mean, I -- that's what I was talking not necessarily the -- although both are 12 about, important, not necessarily the multiple ways to go and 13 operate something. 14 MR. STATTEL: Right. Well, the design is 15 16 not --17 MEMBER BROWN: Some of my experience with some of the -- in some of the shipboard areas that we 18 19 had, they used the touch screens and they ended up with inadvertent operation of a number of kind of 20 interesting devices --21 22 MR. STATTEL: Right. MEMBER BROWN: 23 \_\_\_ in the aircraft carriers, and they decided that they wouldn't do that 24 25 They went back to -- that was one of the any more. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	initial propulsion control schemes. And they ended up
2	getting some engine orders that were undesired at the
3	wrong time, and they went back to the old
4	MR. STATTEL: Right. I will mention that
5	we are really only using all digital and all touch
6	screen controls on the non-safety systems. On the
7	safety systems, for the highly important components,
8	there are a set of hard-switch controls that are used
9	as backup for those type of features, for the safety
10	functions that have been identified.
11	MEMBER SIEBER: So it's going to be a trip
12	switch.
13	MEMBER BROWN: They are a hard switch.
14	They are backups.
15	MR. STATTEL: Yes, they are.
16	MEMBER BROWN: But it still doesn't
17	address the issue of having an inadvertent operation
18	due to the
19	MR. STATTEL: No, the inadvertent
20	operation of safety systems is really addressed
21	through the use of a hazards analysis. We do have
22	four independent divisions of the safety systems, and
23	we also have the diverse protection system. So it
24	really the single failure of a division doesn't
25	prevent the safety function from occurring, nor does
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1	it nor would it accurate the safety function.
2	MEMBER BLEY: I think you are missing what
3	he's asking, if I understand you right, Charlie. The
4	question really deals with the human using that
5	interface
6	MEMBER SIEBER: That's right.
7	MEMBER BLEY: and problems that can
8	occur because of him trying to use that touch screen
9	and getting the wrong thing going at the wrong time.
10	MEMBER SIEBER: That's one item. Yes,
11	that is.
12	MR. STATTEL: And you had asked if we had
13	performed analysis, and, really, that is part of our
14	process, because it is really the HFE process that
15	is outlined in NUREG-0711 really has us get the
16	operators together, and we're designing this control
17	room around the operator rather than the traditional
18	backfitted and do the HFE activities after the fact.
19	So we are currently having meetings. We
20	have a group of about 30 operators, and people from
21	other disciplines participate in the functional
22	requirements analysis, and also the task analysis
23	activities. And when we have those meetings, we
24	part of the process is we do discuss the potential
25	failure modes of the systems and how the operator
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reacts to that.

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the line, when we have Now, down our built, validate all 3 simulator we will of the assumptions that we're making during these task 5 analysis activities today in the actual control room, so we'll actually monitor the performance of operators 6 that are running through the postulated failure modes 7 8 and events that we are discussing today.

9 May I ask you a related MEMBER BLEY: 10 During the Subcommittee meeting on this question? 11 chapter, we talked some about the fact that most of 12 the hardware or software design, and procedures coming out of the HFE process --13

MR. STATTEL: That is correct. That is 14 15 correct.

MEMBER BLEY: -- won't actually be in 16 17 place and reviewed until the COL stage. We were given assurances much like the talk you have given us so far 18 19 that these designs are moving right along in parallel with the rest of the design development, and that 20 actually some of the boards are designed and some of 21 the procedures are actually drafted. 22

And I was referred to the NEDO documents 23 where I could see some of that real product that would 24 25 be approved in the COL stage. I've got a dozen of the

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1 NEDO documents, and essentially all of them, the ones 2 I have found, are only telling me about the process, which is a good process, but aren't showing me any 3 4 product. Did I get wrong information last time 5 about --No, that's correct. And we MR. STATTEL: 6 7 are actually -- that has been brought up as a couple 8 of open items, and we actually do have some lower-9 level procedures, some implementing procedures that we 10 are actually working to that are -- that are going 11 forward and developing the procedures and the products. 12 And we are currently working with the NRC 13 to set up an audit, so that they can come in and 14 15 review those procedures, because those are really beneath the licensing basis here. They are the subset 16 of those procedures. 17 MEMBER SIEBER: They do have operators on 18 the teams putting this together, which --19 20 MR. STATTEL: Right. MEMBER SIEBER: -- without them you would 21 22 really be --MEMBER BLEY: I would be really upset. 23 MEMBER SIEBER: -- in really bad shape. 24 25 MEMBER BLEY: Yes. I think the process is **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 a good one, but we -- we were told we could see some 2 of these interim products, because some of us are not 3 completely --4 MS. CUBBAGE: I think that might have been 5 a misunderstanding, because the NEDO documents are process documents. 6 MEMBER BLEY: Every one I have seen is a 7 8 process document. 9 MS. CUBBAGE: There are outputs of those documents that will be implemented later, and then 10 11 there are --But they are actually --12 MR. STATTEL: they are implemented, and we are actually working to 13 those procedures, those implementing procedures. 14 15 MEMBER BLEY: That's what we wanted to hear something about. Even though that's not what 16 you're approving now, Amy, I understand what -- but 17 we're --18 19 MS. CUBBAGE: I understand. 20 MEMBER BLEY: At least I'm not completely comfortable with all of this being in the COL stage. 21 And if it is going on, we wanted to see a little bit 22 of it. 23 MR. KINSEY: This is Jim Kinsey. 24 Could 25 you just maybe clarify the discomfort, because, again, **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

126 1 the process documents are the certification documents. 2 So I guess I --3 MEMBER BLEY: I understand that. 4 MR. KINSEY: -- I want to understand the context of the discomfort. 5 MEMBER CORRADINI: They want to peak under 6 7 the hood of --MR. KINSEY: The area under the hood I 8 9 guess of the available --10 MEMBER STETKAR: Let me give you a small 11 analogy. We've seen now two very different, from my 12 perspective, physical designs for a simple vacuum breaker isolation valve. That's a piece of hardware 13 that has evolved quite rapidly, and we've seen nothing 14 15 about any design of the control room, the entire control room, the entire human-machine interface. 16 We have seen nothing about this, and we 17 have seen two -- according to the same 18 design 19 principles -- two very different designs of a piece of Same design principles, same criteria for 20 hardware. isolating leakage, same design analyses, 21 same criteria, and so forth, things have changed very 22 rapidly in the hardware area, and we have seen nothing 23 the human-machine interface, except 24 for 25 specifications. **NEAL R. GROSS** 

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MEMBER SIEBER: The problem with hardware in digital I&C is if you see something now and like it, by this time next year it will be obsolete and something else will be in there.

5 MS. CUBBAGE: And to follow up on that, the concept -- the design acceptance criteria or DAC 6 7 approach that is approved by the Commission as 8 Commission policy recognizes that fact of the evolving 9 technology. So if a design certification applicant were to effectively lock in by rulemaking specific 10 hardware technology in this area, the certification 11 12 lasts for 15 years and then is renewable, and then the combined license applicants come in, get a license 13 that -- and then they construct and then they operate. 14

By the time this hardware is installed, it could be 20 years from now. So it really wouldn't be appropriate to lock in on the specifics of the types of screens, etcetera, at this stage.

19MR. STATTEL: And we have been working20hard --

21 MEMBER BROWN: Hold on. I'm not dealing 22 with that. I understand that fully when I made the 23 comment. Okay? I have been through three different 24 -- or four different in my past career of upgrades 25 that we had to totally redesign everything due to

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1	technology movement.
2	And, but it's so I'm not talking about
3	the specifics. I'm talking about the principles
4	behind the application of the technologies. And if
5	you
6	MEMBER SIEBER: That's what's getting
7	approved here.
8	MR. STATTEL: Well, it's the principles
9	that we're trying to establish right now.
10	MEMBER BROWN: Yes, it's the principles
11	that I'm interested in relative to the operator
12	interfacing with the actual whatever the mechanism
13	is he is going to command an action to be taken, as
14	well as, subsequent to that, functionally the
15	principles with which the rest of the control system
16	goes out and tells the particular piece of equipment
17	to do it. So there is a number of phases.
18	You've got the hardware aspects, which are
19	constantly evolving. You've got the software aspects,
20	which are constantly evolving. But there are
21	principles that you can use that will ameliorate or
22	make less difficult to deal with as you go go from
23	plant to plant or from design to design. I mean,
24	you'll be lucky once you've put one of these plants
25	in. You build the next one five years later, you are
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1	going to have different hardware
2	MR. STATTEL: But the principles will not
3	change.
4	MEMBER BROWN: and different software,
5	but the principles have to stay the same. And so what
6	if anything, processes I like process. It's nice.
7	Human factors engineering is valuable. But the
8	process has to be based on some set of principles that
9	you are going to use. And that's what
10	MR. STATTEL: In fact, the process
11	development is what
12	MEMBER BROWN: As I see these, that is
13	what I would be asking about as we go through this.
14	MR. STATTEL: Yes. In fact, the process
15	does facilitate developing those principles. And, for
16	example, one of those products is the style guide, and
17	that's kind of what would ultimately dictate how
18	you know, the colors of valves and how we indicate to
19	the operator the concurrent status of a pump or a
20	valve or some component.
21	And that's really we are doing that,
22	and we don't we certainly don't intend to keep you
23	locked out of what is under the hood, because we want
24	you to see the activities that we have going on right
25	now, because this is really a decisionmaking process
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130 1 that we're going through right now. And we've had a lot of discussion in the 2 3 last month over the DAC, the design acceptance 4 criteria, and trying to establish the line of what 5 what would be, you know, needs to be DAC and construction ITAAC items for the --6 MEMBER BROWN: What is DAC again? 7 8 It is design acceptance MR. STATTEL: 9 criteria. 10 BROWN: Okay. be MEMBER Sorry to 11 ignorant. 12 MR. STATTEL: Well, it's basically the design certification would be based on the process for 13 developing the design rather than the completed design 14 15 itself, since we are kind of doing these HFE activities up front, that will develop the principles 16 17 that you have mentioned. 18 And, really, you know, we understand your 19 charter as far as issuing the design certification and having to make that safety evaluation call, and the 20 importance of that. So we want you to have the right 21 information, and we want you to understand that we are 22 following the process that is outlined in the NUREG. 23 And we have a high degree of confidence 24 25 that our products that we are creating here, as far as **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701

the principles of design -- not specific design -will be acceptable, right? Now, we have an upcoming audit that we propose. We are kind of working out the logistics of that now.

5 But I believe that will take place next 6 month, and part of that audit will be opening up our 7 implementing procedures and allowing the NRC to come 8 in and actually participate and see what it is that we 9 do in these task analysis meetings and when we are 10 performing these functional requirements analysis 11 activities.

So that is the place where the decisions are being made about principle, and we want the NRC to see that process in action, because we are in the middle of doing that right now.

16 CHAIRMAN SHACK: Mike, we are running17 about half an hour late already.

MEMBER CORRADINI: I know.

19 CHAIRMAN SHACK: How much longer can you
20 -- do you think you're going to take?

 21
 MR. STATTEL: Oh, I'll just be a couple

 22
 more - 

 23
 MEMBER CORRADINI: It's out fault, but I

 24
 will - 

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 MS. CUBBAGE: I mean, we can -- the staff

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1	can or cannot present. It's your choice. And we can
2	do it in one slide.
3	MEMBER CORRADINI: I think we want to have
4	them finish and have the staff conclude, though. I
5	think we'll finish in a few minutes.
6	Dr. Shack? I don't want to be schedule-
7	driven. Sorry, I had to do that.
8	(Laughter.)
9	CHAIRMAN SHACK: We'll be here Saturday
10	morning. Thank you, Mike.
11	MEMBER CORRADINI: Well done. I deserved
12	that. Thank you.
13	MR. STATTEL: Okay. Well, I'll just
14	finish up fairly quickly here. The current status is
15	that Chapter 18 is the update to that will be
16	submitted of course with the Revision 5 of the DCD.
17	And we have answered all of the RAIs that were
18	associated with that, and I think some new ones just
19	came in, however.
20	We have as mentioned, we have a dozen
21	LTRs, which are also being updated, mostly in response
22	to the RAIs that we have received and answered.
23	And we have established what we call a
24	HFEITS system, which is a the issue tracking system
25	for the HFE issues. And we use this as part of our
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process in order to collect data and also provide feedback to the design engineering groups, so this is what's driving the design of these systems. And the systems engineers also participate in all of our HFE activities as well.

Okay? We spent a lot of our time 6 7 analyzing OE, operating experience, and we have 8 brought a lot of operating experience just from the 9 staff that we have hired in. And an example, we have people from the fossil plant that have fossil plant 10 experience, nuclear experience of course from both 11 12 sides -- boiling water and pressurized water reactors. And also we have -- we have the experience from the 13 Lungman projects and the predecessor designs. 14

And we are constantly -- well, we are getting up to speed with the OE, and we are also getting on board with just distributing that OE to the design engineers, so they incorporate that into their design as they create it.

20 CHAIRMAN SHACK: Of course, Lungman isn't 21 operating yet, but --

22 MR. STATTEL: That's correct. That's 23 correct. But they -- we do share resources, so we 24 keep abreast -- well, they are actually part of our 25 team. We have several people from the Lungman project

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who participate.

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2 As I mentioned, the functional requirements analysis, task analysis activities, are 3 4 currently being performed and will be open to the 5 And the program elements are being prototyped audit. through procedures and training that we are offering. 6 And that's all I have. Okay. That has 7 8 pretty much hit the high points of what was discussed 9 at the Subcommittee meeting. MEMBER CORRADINI: Thank you very much. 10 11 MR. STATTEL: Thank you. 12 MR. GALVIN: Okay. We are just going to go through the final summary slide. 13 MEMBER CORRADINI: Good. 14 15 (Laughter.) MR. GALVIN: Ιt has already 16 been 17 discussed. My name is Dennis Galvin. I'm the Project Manager for Chapter 18, and we have also with us our 18 19 Technical Lead, James Bongarra. What we are reviewing is a process. 20 We don't have a design before us. That picture they keep 21 showing is not in the design certification as their 22 23 concept. have made considerable progress 24 We in 25 addressing the issues. That is our first bullet. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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There is some level of details remaining for some of the implementation plans, which describe the process. Essentially, in some areas they have repeated back our guidance to us. That is really not what we were looking for.

They have cited, well, the actual methodologies in these procedures, so we've -- we're working out logistics of a -- when we're looking at those procedures. I guess based on what we've seen to date, we don't expect any major obstacles.

Jim, did you want to add anything? I think that's the message we have. You've sort of covered most of the points with GEH.

MEMBER BLEY: I would just say one thing. 14 15 I am -- I am glad to hear what you just said, because this is a process that looks very good. It has been 16 17 laid out. But becoming convinced that the process is leading to what it is intended to lead to seems to me 18 19 something we don't want to wait until it's all done about, and it sounds like you're doing that, so I'm 20 pleased to hear you are going --21

MS. CUBBAGE: Right. And I will also add that the DAC process -- DAC are implemented through verification of ITAAC, but these are special ITAAC. They are ITAAC that verify the design has been

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completed in accordance with the process that the
staff will approve in the certification. And we will
be inspecting and verifying that the design comports
with the process before they actually install hardware
in the plant.
So there is that checkpoint long before
the plant is actually going to be constructed and
ready to receive authorization to operate.
MEMBER SIEBER: But the approval is done
by inspection, right?
MS. CUBBAGE: The approval of the design
and conformance with the process is done through our
inspection program.

MEMBER SIEBER: Right.

MS. CUBBAGE: So in that case, we need to 15 make sure, through the review process, that these --16 the processes are detailed enough, such that they --17 it would be repeatable. If multiple people were to 18 19 try to implement this process, they would achieve acceptable results. 20

21 MR. GALVIN: They have also estimated that, you know, some percentage of the DAC -- design 22 23 acceptance criteria closure process will involve some level of technical review. So the more technical 24 25 aspects could involve the technical staff at some

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level. 1 2 MS. CUBBAGE: You are absolutely right, Dennis. I mean, by inspection, we mean that's the 3 process we are in, but it would involve HFE experts 4 5 here at headquarters and consultants as necessary. MEMBER BROWN: What do you mean by 6 "inspection"? 7 8 MS. CUBBAGE: It's --9 MEMBER BROWN: Like in a paper or --MS. CUBBAGE: Both. 10 MEMBER SIEBER: Both. 11 12 MS. CUBBAGE: The design prior to installation, and then the actual --13 MEMBER BROWN: The actual hardware. 14 15 MS. CUBBAGE: -- the actual as-built hardware after. 16 MEMBER SIEBER: The hardware in plants 17 18 that --19 MEMBER BROWN: Yes, okay. MS. CUBBAGE: And all of that has to be 20 21 completed and verified prior to the Commission 22 granting authorization for the applicant -- the COL 23 licensees to load fuel. MEMBER BROWN: Can I make one additional 24 25 comment? **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

MEMBER CORRADINI: Sure.

MEMBER BROWN: One of the benefits -there is downsides to all of this digital-type stuff as well as the upside. And one of the downsides is you can present so much information to people that they lose track of what's valuable and useful in their evaluation of what -- the plant conditions and what they ought to do next.

And I guess -- somebody can correct me if 9 I'm wrong, because it has been 28 years since I looked 10 11 at it, but when TMI occurred one of the fallouts of 12 that was data overload and the wrong data that -which the operators had access to. And they were 13 distracted from some of the indications that would 1415 have given -- possibly, never say for sure, but possibly given them a clue as to what was going on. 16

17 And I've thought through this, and as we developed all of the microprocessor and computer-based 18 19 systems for the nuclear Navy, and we had -- the laboratories love to present tons of information to 20 the operators, and headquarters was always taking it 21 off the screen and putting just the stuff for certain 22 23 operations that the operators needed to make sure the plant -- they could control it and make sure that the 24 25 plant was being operated satisfactorily.

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139 So that's what I will -- you know, I'm not 2 trying to control everything. I just -- since I'm the newbie, I just thought I'd speak up. But that's the kind of stuff I think about in terms of how we apply It's good stuff, very reliable stuff. this. Ιt operates better and more consistently than the -- a 6 lot of the older analog stuff, much cooler and less 7 8 subject to other drift problems, and everything else. But you've got to make sure you don't fall into the trap of -- I think we've got all of this good 10 information, and we have just got to get it out there. 11

12 So that's just -- it's some input to the thought process. That's all. 13

MR. BONGARRA: I feel compelled, as the 14 15 staff lead, to say at least a word. I certainly -the staff certainly shares your concern, sir, about 16 the potential pitfalls you just identified. 17 And having worked with this process that Rich outlined 18 19 just a minute ago here for some time, the staff is also confident that the process that we have in place 20 to look at an overall human factors engineering 21 program -- again, at a methodological level -- is a 22 pretty solid one. 23

We have applied the process to our four 24 25 previous design certifications, and we continue to

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apply it certainly to ESBWR and future designs. I'm sorry that I don't have an opportunity here to go into a little bit more detail, to try and really address some of the concerns that I am very pleased to see that the ACRS members have raised on -- Dr. Bley, your question about the details.

7 certainly concerned about We are the 8 details as well. No question there. And we are, as 9 has been mentioned, planning on yet another technical review of more detailed work instructions where some 10 of these principles that were identified already 11 hopefully will be available to us to scrutinize. 12

Again, I'd like to talk further about it, but I won't. The verification-validation process where I think a number of issues that have been raised by the Committee may be addressed, and I'd like to talk at some point, if possible, about that. But at this point, I realize we are overdue.

And if the Committee would like to hear more about the staff's efforts to review human factors engineering in Chapter 18, and procedures as well which are part of Chapter 13, and the principles that support those -- the development of those procedures, we would be more than happy to come back and talk with you.

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1	Thank you.
2	MEMBER CORRADINI: Thank you.
3	Other comments by the members?
4	(No response.)
5	Thank you to GEH and the staff.
6	And, Mr. Chairman, on time, on budget.
7	(Laughter.)
8	CHAIRMAN SHACK: We are on break until
9	11:30.
10	(Whereupon, the proceedings in the foregoing matter
11	went off the record at 11:15 a.m. and went
12	back on the record at 11:30 a.m.)
13	Insights from PHEBUS - FP Tests
14	CHAIR SHACK: Our next topic are insights
15	from Phebus-FP tests. Again, these are integral tests
16	with application from severe accident Source Term and
17	some very interesting results that they have recently
18	obtained on containment iodine behavior. And Dr. Lee,
19	I assume you will be leading us through this.
20	MR. LEE: Thank you, Mr. Chairman. It is
21	almost a year ago we came before this committee and
22	reviewed on Phebus. And Bernard Clement was with me
23	at that time and we are pleased to have him back
24	today. Last time, he didn't talk about it. So, at
25	this meeting he is going to give the French view of
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what the lessons learned from the Phebus tests. So, we are going to let him go first and then the staff would like to share with you what our findings from NRC perspective and what we need to do for the rest, at least two years from now. So, Bernard.

MR. CLEMENT: Thank you, Richard. 6 So I am 7 Bernard Clement from the French Institute for 8 Radiological Protection and Nuclear Safety. So, we 9 are making the Phebus-FP program. And my position in 10 this program is tat I am the scientific project leader. 11

12 In this program and also in the following 13 program that is the International Source Term Program. 14 And so as Richard said, I will try to provide you 15 with our main findings, view from ourselves, from 16 IRSN.

Some main lessons learned from Phebus-FP 17 fuel degradation, efficient product 18 concern and 19 material release, their transport in the reactor thermal-hydraulics 20 cooling the in the system, containment building and also aerosol behavior in the 21 containment building, and iodine chemistry. After we 22 will have some words about the status of knowledge and 23 implications and what is the Phebus following program 24 25 that is International Source Term Program, which a

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general objective and the different studies, different experimental studies that we are performing now.

So, for the fuel degradation, I am sorry we have not made the introduction from our Phebus but if you have questions about that, you can ask during the presentation.

7 Our first thing on fuel degradation we have looked at in the Phebus experiments are small 8 9 fuel benders, long, is the cladding one meter 10 oxidation. Well, performed the first when we experiment, FPT-0, without surprises, we have made 11 12 pretest calculations and we observed a much more violent than expected cladding oxidation runaway, as 13 can be seen here on this kind of graph, cladding 14 15 oxidation runaway. And in fact, in all of our correlations for use for calculating 16 that were 17 validated on the different experiments. And we went out of the validation range over what was expected. 18

19 So, we have revised these correlations and are able to have correct predictions of 20 now we cladding oxidation for different kinds of transients 21 you can see under here, three different slopes or 22 three different Phebus-FP tests. is 23 And this important not only for hydrogen production totally 24 25 alone but for hydrogen production rate. Because

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144 1 depending on the hydrogen production rate, if it is 2 true important, you may have difficulties with 3 recombiners of fuel vapors. That was the first point. For the fuel degradation, we have had some 4 5 surprises again at the beginning of the program. We have observed that fuel liquefaction and 6 more 7 precisely transition from rod-like geometry to molten 8 pool at temperatures that we are far below their true 9 melting point of pure uranium. So, something like 500 Kelvin or Celsius or below. 10 Well, in fact, the calculation codes are 11 12 able to take this into account, adjust say calculate the fuel when you reach such a level of temperature, 13 you have to relocate downwards from a melting places 14 15 of first. While this works well to reproduce what is done. 16 17 MEMBER ABDEL-KHALIK: I'm sorry, in the previous slide, what is the difference between these 18 19 three, FPT-0, FPT-1, FPT-2? MR. CLEMENT: The differences are mainly 20 the fluid in the bender. In the first 21 steam experiment, FPT-0, the steam fluid coming into the 22 And not all the steam is 23 bender is large. Okay? consumed. You are always in excess of steam in this 24 25 So that, the excess of steam is not the experiment. **NEAL R. GROSS** 

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limitation for the cladding oxidation. Why FPT-1 there is less steam than in FPT-2, there is even less steam and there is a steam starvation. You consume all of the steam and the steam amount is the limiting factor.

And in fact, I would say that experiments, the correlations have been validated first on the experiment site in conditions more like these ones such as, for instance, a PBF experiment in the past. And when we have applied that to experiment where there was no limitation on steam, it didn't work.

12 MEMBER ABDEL-KHALIK: Can you scale these 13 results then, based on steam flow? In other words, if 14 I give you the results of FPT-2, can you predict the 15 results of FPT-1 --

16 MR. CLEMENT: Yes. All these three are --17 yes, you can predict all these three with the new 18 correlations, no problem.

> MEMBER ABDEL-KHALIK: Okay. Thank you. MR. CLEMENT: Predict all this range.

Okay. As I said, it is possible to reproduce the fuel degradation at low temperature. But it is also important to understand why. While there were quite recent measurements of a fuel temperature, high isometric fuel temperature. And

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from this point and from oxidation measurements and thermodynamic calculations, in this Phebus experiment, you probably have this high burst stoichiometry. And then from this one, we arrive at recent measurements that have been performed on high burst stoichiometric hues. So we can explain from that and different kind of interactions this temperature level.

8 Just to give you an example of what codes 9 have been calculated, we have adjusted the fuel 10 relocation temperature. On this graph, this is the So initially, the mass 11 elevation of the bundle. 12 distribution in the bundle was a straight line like that but is measured here, distribution is a black 13 solid line. This is a measurement. So you have here 14 15 fuel that has disappeared and fuel that has been relocated here in the molten pool. And you can see 16 17 the curves here, calculations. So the gray line is the total mass. But you can just reproduce it without 18 19 any trouble.

FPT-1, this is also the case with MELCORwith the same kind of assumptions.

Coming to Source Term, we come to the fission product releases. While in Phebus experiments, as we go up to very large degradation with the molten pool, where the volatile fission

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products are nearly totally released. How volatile our fission gases are iridium, caesium, and so on.

While in general, the total amount of volatile is well calculated by the codes, with some differences, there are some codes that do not take into account the fuel oxygen potential on fission product release. Sorry to be so technical.

8 the case, for instance, with the But 9 CORSOR approach. In that case even CORSOR approach is using MELCOR, for instance, even if the total amount 10 of volatile is well calculated, the kinetics are all 11 12 resonated at the beginning of the transient. That is because they don't take into account the progress of 13 oxidation of the fuel that increases at issue 14 in coefficients. 15

16 Okay, and this is what I called semi-17 empirical models. You can eyeball to do well for 18 that.

For less volatile for which chemistry plays an important role, the situation is I will say more contrasted. I don't have, I think -- no, I don't have them. For instance, there were some difficulties at the beginning through calculate molybdenum that was generally underestimated by the calculation codes. Now, it is better. But this is not the case for all

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of the models, I would say. Because for to calculate that well, you have to take into account chemistry within the fuel and also outside of the fuel. And this, to do that, we use in fact mechanistic codes, without describing the reparation of fission products in different phases of the fuel and their changes with temperature and stoichiometry.

8 There is also a coupling between fission 9 product release and fuel degradation. A good example The barium release is much smaller in 10 is the barium. 11 Phebus than in separate-effect experiment. Separate-12 effect experiments are experiments performed on the irradiated fuel. And in these experiments, there is a 13 large release of barium. You can see there is a low 14 15 release of barium. We have looked at that, made the thermodynamic calculations and so on, looked at the 16 interactions between fuel and cladding material and 17 this is reduced in barium volatility because 18 of 19 interaction between true and oxidized zirconium. So, that is important to take into account. 20

And also we observed this was not a surprise for us that there was a low release from the molten pool.

What is important and you will see that afterwards, it is for iodine chemistry are the release

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of silver-indium-cadmium control rod. Why? Because all of these elements may react with iodine to form metal iodides. And especially in the containment, silver reacts with iodine, it can trap iodine in the sump water and it is no more available.

So, it is important to know how much the 6 indium and cadmium will come out from your 7 silver, 8 While it is quite easy while governing core. 9 just need to calculate the vapor phenomena, you above 10 pressure of these elements complicated a 11 mixture, but this is physical. So governing phenomena 12 are well understood, but there are some coupling between the degradation processes of the control rod 13 and vaporization of the material. And here some 14 modeling effort is still needed. 15

Okay, coming up to the transport in the 16 17 reactor cooling system, in contrary to what was generally assumed by everybody 18 for the first 19 experiments, in the hot leg of the Phebus to start with that is at about 700 Celsius, iodine and cadmium 20 were the only non-condensed elements of the first true 21 That simply means that the 22 test of the program. 23 hydroxides, caesium, CsOH, caesium was not the dominant species for caesium transport, as assumed by 24 25 everybody before.

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While this made some code calculations, in fact these are thermodynamic calculations taking into account the ground release of the elements and for that we calculate caesium molybdate. And if you look at volatility of caesium molybdate, it is consistent with caesium being condensed in the hot leg of Phebus, FPT-1. So, this shows that the volatility of caesium

Jodine was observed to be transported
partly as a gas and partly as metal-iodides. While we
did not measure in Phebus direct association of metal
iodides, while metal iodides can be caesium iodides,
silver iodide, cadmium iodide and others, what we can
say is that caesium iodide is not the only species for
iodine transport as a vapor and as an aerosol.

previously assumed was not correct.

This is quite a complicated point. 16 In here you have got a line with a high temperature here, 17 a low temperature here. And what is released from the 18 19 enters this line and there is а thermal core What is in pink is the deposition of 20 gradient. What is in red is the deposition of iodine. 21 caesium. This part here, you can see only iodine, without any 22 This means that this species was not caesium 23 caesium. iodide. 24

In this part, it was at another time of

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the experiments, you have got a pink peak and a green peak in the same place. So this is likely to have been caesium iodide. And the other peaks was not caesium iodide. And as I say, caesium iodide is not the only species.

But for other points about depositions, I 6 am just speaking here about some differences between 7 8 what have been seen and what is calculated by codes, 9 we over just above the core, the bundle, vertical 10 section where the temperature drops down 700 to Celsius, so from say 1500 to 700 Celsius. 11 And the 12 high deposition in this part was underestimated by all calculation codes. 13

We have looked at that and in fact, it is simply because we are not in a developed flow nor hydrogen and this can be explained by that. So that is the first one.

18 Then we in the circuit, we have a high 19 temperature gradient in a portion of the circuit 20 simulating a steam generator in here. The main deposition mechanism is due to the gradient between 21 the flow and the walls. And this is thermophoresis of 22 aerosols and this is overestimated by codes. 23 Here, the question is not sold. Some partners of the Phebus 24 25 FP program, mainly Swiss, are looking at things about

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1	interaction between turbulence and aerosol particles.
2	So, they needed promising wait.
3	But overall, in the Phebus-FP experiments,
4	you have overall 50 percent of retention of what is
5	emitted from the core in the circuit, or something
6	like that.
7	CHAIR SHACK: Fifty percent?
8	MR. CLEMENT: Fifty. Fifty percent. Not
9	for all the species. But okay, if you take an example
10	for the steam generator, and you have 20, 25 percent.
11	MEMBER POWERS: I just need to interject,
12	it is no more wildly different than what is assumed or
13	what comes out of an accident calculation. And the
14	details of where it is accruing are different.
15	I will also comment that the speciation
16	has profound ramifications on how you treat iodine in
17	the reactor containment and we will talk more about
18	that as the day goes on. But the fact, for instance,
19	the caesium hydroxide is not coming out, then you get
20	to count on caesium hydroxide keeping some basics so
21	you don't get iodine partitioning in a pool. Well,
22	that is just not happening.
23	MR. CLEMENT: I have tried to be rather
24	brief here. We also simulate what are the thermal
25	hydraulics in the containment. Well, it is quite
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simple. It simply a closed volume without compartments and so on. And the thermal hydraulics are governed by the balance between the incoming steam in the containment and the condensation indoors. And of course, we have no problem to calculate that. The models are okay.

depletion 7 The aerosol inside this 8 containment are mainly due to gravitational settling 9 and diffusiophoresis. That means entrainment by the condensing steam onto the condensing surfaces. 10 This calculated 11 is also generally well by models implemented in the calculation codes with some smaller 12 detail here. But this is probably not fully typical 13 of the reactor so skip it to save some time. 14

This is to show you the general evolution of the gaseous iodine in the containment wall. We have all of these points, I would say, measurements, of gaseous iodine. This is for the second experiment, FPT-1. This is for the first experiment, FPT-0.

While you have got here different phases 20 of the experiment, the fuel degradation phases here, 21 so they are short few hours, and they were short, this 22 Okay? And then after the fuel 23 is a few days. 24 degradation is stopped for this period, have we 25 aerosol settling and so on. And then we let the thing

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evolve during different periods here.

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2 So what is interesting to notice, first of 3 all, that is that this is a very strict schedule and 4 over two days from here to the top. The first point 5 is that you observe an early presence of gaseous iodine in the containment. And this, if we look at 6 our models of gaseous iodine of iodine chemistry in 7 8 the containment, we cannot explain this early presence 9 of gaseous iodine in the containment by, for instance, prediction of volatility in the containment coming 10 from the same portal or whether it is this or other 11 12 things. So, this cannot be explained by that.

Then we have a decrease. This decrease is 13 quite important for the first 14 important, very 15 experiment, less for the second one but still important, as it is a logarithmic scale. 16 And then 17 what is interesting is that we arrive in a sustained level here. 18

19 Δ little comment about this second experiment, FPT-1, well, first a sustained level here 20 21 and then a second sustained level here. What happens at that time is that there were some aerosol particles 22 23 deposited on the bottom of our vessel, invading the containment. At that time, you have washed this 24 25 aerosol in order to put everything in the sump water.

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1	That means that we have iodides, aerosols containing
2	iodine deposited here that we have washed down and
3	left them in the sump water. Then we have a small
4	jump. And then we get a sustained level.
5	So, that is important to remember we don't
6	always obtain this different sustained levels.
7	CHAIR SHACK: Now, I can't recall. Do the
8	tests have the same sump pH?
9	MR. CLEMENT: Yes.
10	CHAIR SHACK: These are both high pH?
11	MR. CLEMENT: No, it's pH-5.
12	CHAIR SHACK: Oh, it's pH-5, acid.
13	MR. CLEMENT: Acidic. But it is pH-5 but
14	you will see afterwards there is some silver in the
15	sump. I think it is after a while.
16	Yes, some comments first on this first
17	part, this early presence. Okay? Well, as I said
18	before, it is likely to have been formed in the
19	primary circuit of gaseous iodine. And when we make
20	thermodynamic calculations in the reactor cooling
21	system at equilibrium, we don't find this gaseous
22	iodine. So, we think this is linked with non-
23	equilibrium chemical effects. That means we are not a
24	thermodynamic equilibrium.
25	This assumption is supported by the
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156 1 existence of a sharp and large temperature gradient. 2 And you are at high temperature. At high temperature, 3 you are very likely to be a thermodynamic equilibrium. 4 Then you make some quenching of your system. So you 5 may keep one part of the species that are stable high temperature. You may keep part of them at 6 low 7 temperature and then release free iodine. This is the 8 affect of this gradient such as chemical quenching. 9 And this is also fully compatible with the difference between the two first tests. 10 11 MEMBER ABDEL-KHALIK: Now, the initial iodine inventory in both of these cases is the same. 12 MR. CLEMENT: No. 13 MEMBER ABDEL-KHALIK: It is not? 14 15 MR. CLEMENT: Yes. MEMBER ABDEL-KHALIK: The initial in the 16 bundle. 17 MR. CLEMENT: Yes, it is not the same. 18 19 MEMBER ABDEL-KHALIK: It is not the same. 20 MR. CLEMENT: Yes. And just because of this is a trace irradiated fuel. 21 MEMBER ABDEL-KHALIK: This is what? 22 This is trace irradiated 23 MR. CLEMENT: 24 fuel with a very low burner. Okay? So, here, 25 reactivity is the same but the number of modes in this **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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experiment is much lower than in this one. This is expressed in a fraction of the initial inventory. This is a fraction of the initial inventory. But I would like to point out is that it is much higher for this one with a low number of iodine modes. And this is consistent with the assumption of non-equilibrium chemical effects. Because if you have a small amount of modes, it is much more difficult to, I mean the kinetics of the chemical reactions are slower.

10 Okay, there was in the last experiment 11 performed a fraction. We will come to this probably 12 later on.

Okay, this comes to your question what was 13 So, the sump pH in these two experiments 14the sump. was acidic but in fact, we have released the silver 15 from the full bundle. And in these two experiments, 16 iodine has reached with silver in the sump water to 17 form non-soluble species of silver iodide. And then 18 19 once it is non-soluble, this is inhibiting gaseous iodine production by radiolytic processes, despite the 20 acidic pH. So, most of the iodine will instruct into 21 22 the sump water.

For the third experiment, we have used an alkaline pH. So, it is well known with pH and it is high for iodine remain trapped.

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MEMBER ABDEL-KHALIK: In a hypothetical accident, what would be the timeline for failure or melting of the fuel versus melting of the control rods?

5 MR. CLEMENT: Oh well you have got the 6 starting of I would say release from the control rod 7 and start of iodine release all the same. So, I mean, 8 the control rod in the silver-indium-cadmium will 9 fail, anyway it will fail at stainless steel melting 10 temperature because the cladding is stainless steel.

So anyway, at 1400 Celsius, you will have 11 12 some free silver that is molten, at that time, that is in contact with the atmosphere of the reactor cooling 13 So you will have some release of the vapors 14 system. and the iodine release will start later on. 15 And then you have gotten the core and it is quite high, a 16 progression of this degradation of the control rod 17 later. So you would have a quite continual release of 18 19 this silver.

But this kind of reaction here, in fact, iodides in the containment reaction, reaction of silver with iodine. And in fact, well, it is a little bit complicated but silver metal -- metal silver is reacting with iodine. But if silver is oxidized, reactions are faster.

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1	MEMBER ABDEL-KHALIK: Right.
2	MR. CLEMENT: And in a containment, silver
3	aerosols are partly oxidized due to radiolysis
4	products and things like unless the reaction is faster
5	and is more efficient.
6	Now, the other experiment, FPT-2, we used
7	an alkaline pH. So, in that case it is normal. And
8	FPT-3, we will come back later on.
9	Here I want to note that for these two
10	tests, an efficient trapping of iodine by silver
11	requires an excess of silver as compared with iodine.
12	Just because silver iodides is decomposed under
13	radiation, even if there is an excess of the
14	composition and then you have that reaction of silver
15	with iodine. But if you have no excess, it will not
16	be 100 percent efficient.
17	CHAIR SHACK: Now, is Phebus prototypical
18	on the relative amounts of iodine and silver?
19	MR. CLEMENT: Well, it is not fully
20	prototypical but fairly well. I would say, in fact,
21	we have one bundle of 20 rods and we add one control
22	rod. Okay? We cannot add one get one and two. In
23	fact, we are in between the amount that is
24	corresponding through an assembly with control rods
25	and an assembly without control rods. We are in
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between them. We are already in excess of silver as compared with iodine, as compared to reactor situation and it is not so bad.

Okay, what we have observed also in the Phebus is that the volatile iodine concentration is mostly determined by gas phase chemistry. This is just because in the sump water we have different mechanism that traps the iodine.

9 I have already spoken about the importance 10 of gaseous iodine injection from the RCS, that is the 11 early presence of gaseous iodine. What is important 12 now is to look back at these sustained levels here. 13 Here are some trapping mechanisms just because the 14 concentration of gaseous iodine phases and then we 15 have a sustained level.

So, why do we have a sustained level? 16 17 Well, this is just because we have got an equilibrium between iodine formation and destruction processes. 18 19 And also we know that iodine can be absorbed on the surfaces and can be also desorbed from the surfaces. 20 So, there is an equilibrium between all of these 21 processes that are sources and sinks in this yield a 22 steady-state concentration in the long-term. 23 That is quite --24

MEMBER ABDEL-KHALIK: Wouldn't that lead

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to a steady-state concentration that is constant on an absolute level rather than a relative level, based on the initial concentration?

MR. CLEMENT: My feeling is that while the initial concentration, if you look at the number of modes, there was a large difference. And there is not a lot of difference here. But we can show you this --

8 MEMBER POWERS: To answer your question, 9 it is in principle yes, but what you will see is one of the things that controls is with the magnitude of 10 11 your sink. And the sink depends on how much steam you At FPT-0 they had a lot more steam. And so it 12 have. is almost coincidental to end up about the same in 13 relative amounts. But if you were to put up FPT-2, 14 you would see it stabilized at a different level. 15

MR. CLEMENT: At a different level, yes.

But it is over -- the MEMBER POWERS: 17 really interesting thing is it always stabilizes a 18 19 level. And if you look at the timeline, that is days. That is just a little period of time. That is days. 20 So, it is a very robust stabilization. 21 It looks a lot like a steady-state. Now, there is a difference 22 in opinion whether it is actually a steady-state or 23 not but it is a, whatever it is, it is very stable. 24 25 And we will show you some data eventually that says

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162 you can manipulate it by manipulating the sink drum. 1 2 MEMBER ABDEL-KHALIK: So this five percent is fortuitous that the two of them ended up at the 3 4 same --5 Well, if you look in MEMBER POWERS: detail, they are not quite the same but they -- the 6 7 problem with any kind of stability there depends on 8 the source and depends on the sink. 9 MEMBER ABDEL-KHALIK: Yes. MEMBER POWERS: And I can manipulate the 10 stability by manipulating either one of them. 11 It 12 turns out in the operational claim is that what they tended to manipulate was the sink. 13 a sustained level, 14 MR. CLEMENT: At 15 probably it will reach a steady-state but just factually --16 MEMBER POWERS: Well, I mean, it could be 17 a steady-state or it could just be a continuous --18 19 MR. CLEMENT: Yes. 20 MEMBER POWERS: -- release that depends more on your inventory and whatnot. And there are 21 different views on that and you can never sort it out 22 based on the steady-state level, until you deplete how 23 24 much you have as your source. 25 Another fact is that the MR. CLEMENT: **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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first two experiments, most of the gaseous iodine was organic in the long-term. This, we have not observed in the last two experiments. I don't understand why. We have to reconcile things. I don't understand why right now.

Also, another point is that 6 we are 7 absolutely to take into account interaction between 8 gaseous iodine and aero-radiolysis products because 9 this is one of the possibility to destruct the gaseous iodine to form in fact iodine oxides that will become 10 particulate. Okay? And we need absolutely to take 11 12 this into account.

Well, this is just some words about that. These are conclusions mostly from IRSN, I would say. We think that we have seen a number of things that were either unexpected or that are badly quantified phenomena. These of course, have been identified in Phebus-FP but also in other experimental programs.

19 First point, these are just examples, Fraction of iodine entering the containment as 20 okay? a gas and not as an aerosol. While we know our safety 21 studies we take five percent in our safety studies, 22 that is exactly the same values that the NUREG-1460 23 shows them, not for the same reasons but it is the 24 25 But you will see now the experiments we same value.

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are far more. That is okay. This was just an example.

3 And with all of these uncertainties, we 4 have looked at the impact on the iodine Source Term 5 assessment studies. You have two kinds of Source Term assessment studies where the classical probabilistic 6 7 safety assessment level two studies. And also you 8 would say what is I would say not an envelope but a 9 pessimistic Source Term that are studied. And this Source Term is used for checking the adequacy of 10 11 emergency planning measures. And from that, we have 12 seen that these uncertainties are important.

Again, just to try to reduce these uncertainties, we have set up a Phebus follow-up program to provide a set of experimental data to allow to improve the models.

Okay, maybe a little bit faster right now. 17 Well, what we have seen from our safety studies --18 19 okay, that is obviously risk dominant in the short And also what is important is a partition of 20 term. airborne iodide in the containment 21 between particulate, organic and inorganic gases. 22

When I said that part of the iodine at the break in the gaseous is a fraction of a gaseous, it is badly quantified. This is Phebus use for FPT-1,

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four percent, FPT-2, 0.6 percent, and the last test, FPT-3, 85 percent. Okay? The difference between these tests and this test is that in these two tests, control rod was in silver, indium and cadmium, whereas in this one, it was it was in boron carbide. Well, is

7 Then safety studies, in our we are 8 looking, when you have got  $I_2$  inorganic iodine in the 9 containment, we have looked at the possibility of this 10 inorganic iodine to be converted into organic  $I_2$ iodine, probably methyl iodide. So this is what this 11 12 graph is what has been done by our people in charge of safety studies. They have looked at all of the 13 experiments that were available at that time worldwide 14 15 and they have translated the experimental results in a very simple number that is a conversion fraction of  $I_2$ 16 17 into organic iodide by interactions with paint. And then they have plotted a distribution function like 18 19 that.

Okay, of all the experiments, this is the number of cases. You see the scale here is 90. So they are part of that. What is important is to see the scattering. So, there is a factor of two between the median values -- factor of ten between the median values of this distribution and the 90 percentile -- I

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there a reason? Maybe.

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166 1 don't know how to say that in English. Factor of ten 2 between this and this. Okay? that 3 So, is a large uncertainty in 4 interactions between iodine and paints. Just to give 5 you an idea of the kind of uncertainties that we are looking at, if we had found a factor of two or three, 6 7 well, not so important. 8 Okay, other point, I was already saying 9 that iodine reacts with air radiolysis qaseous 10 products that are mainly ozone an nitrogen oxides to form less volatile species. So that is good news for 11 12 safety that the species are less volatile. While the fate of the species, what happened to them once formed 13 from small particulate, is badly known. We have to 14 15 look at that. Okay. Maybe it would actually be faster -16 17 - I don't know. MR. I think you wanted to talk 18 LEE: 19 about, briefly, on each of these programs. MR. CLEMENT: Yes, briefly. Briefly. 20 MR. LEE: Because Dr. Shack asked about 21 22 it, what is the follow-on program. Okay. So for the follow-on 23 MR. CLEMENT: program, we studied in the iodine chemistry in the 24 25 objectives. reactor cooling system with two То **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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confirm and quantify the amount of gaseous iodine in the reactor cooling system. We have seen that in Phebus. We have just seen that and better measure it in small scale experiments. That is the sketch of the experiment. And also, as we suspect that there are chemical kinetic effects, we need to measure kinetic data for modeling. And this is how it is done with a high temperature mass spectrometer.

9 This is just a sketch of the first part. 10 It is just a simple tube in which to inject a number 11 of species of conditions which represent hot leg, and 12 cold leg, and you measure what is happening with 13 gaseous iodine.

This is more complicated. This 14 is а 15 system to measure kinetic data. So it is really a reactor, introduce different 16 chemical where you 17 There is cracking of the species, then species. recombination and then you go to a mass spectrometer. 18

19 And this operates, it is quite complicated. And this is what we will do. 20 These are 21 pre-test calculations of these experiments, with a with 22 simple system here few reactions between 23 iodine. hydrogen, oxygen, These are a number of calculate 24 reactions. We what happens with 25 These are the plain lines, solid lines, equilibrium.

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168 1 and what happens with a chemical kinetics, kinetic 2 limitations. Those are the dots. These are pre-test 3 calculations of those experiments that are not yet 4 performed. 5 MEMBER ABDEL-KHALIK: So the data shows 6 considerably less sensitivity to changes in 7 temperature. 8 MR. CLEMENT: Yes. That is just because 9 here is a logarithmic scale again. Here is one indicator. It is in two lines. See it? 10 So it is 11 largest in deviations. Okay? 12 MEMBER ABDEL-KHALIK: Right but looking at a specific set of data, variation with temperature. 13 MR. CLEMENT: Yes. 14 MEMBER ABDEL-KHALIK: Vis-a-vis the model 15 predictions. 16 17 MR. CLEMENT: Yes? MEMBER ABDEL-KHALIK: We are talking about 18 19 in some cases differences as much as three orders of 20 magnitude. MR. CLEMENT: Yes, that is true. 21 But in fact, not all of the -- well, here is our pre-test 22 23 calculations. We have modeled a system with a simplified set of reactions. This is a simplified set 24 25 of reactions with the three elements. Okay? This is **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

a simplified set. Then we calculate all of them.

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But you see here, what happens for these reactions is probably not so important to the amount that are formed are much less than from these ones, for instance. But we need to look at all of that because all of the kinetic constants for all of these reactions have potentially an impact on the results. So we need to model all of that.

9 So, it is just to give you -- the 10 intention in showing you that was just to give you a 11 flavor on the complication of the system for the 12 treatment of such data.

Okay. Then for the containment, we have 13 the EPICUR facility, where we look at the kinetics of 14 15 organic iodides formation through reaction with have already discussed 16 paints. We about the importance. More generally, the kinetics of reactions 17 in gas phase and also some compliments about the 18 19 kinetics of formation of volatile iodine in liquid phase. So what is EPICUR? Just a simple here vessel, 20 a few liters, in which we can put whatever we want. 21 Not exactly whatever but we can put water, paint of 22 23 coupons, things like that and then we irradiate it. We irradiate it and then on-line we measure by here 24 25 specific apparatus, selective filter for gaseous

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iodine, we measure what is produced as gaseous iodine. 2 And here we have a separation between particulate, 3 inorganic, and organic iodine. This is measured on-4 line. And this is an example of the kind of 5 This was an example of an onmeasurement you get. 6 line measurement for liquid phase chemistry. So this is what is on this date for inorganic -- for gaseous 7 8 inorganic iodine here. Here the measurements are made by gamma spectrometry in here. You can see just a 9 statistical of the measurement. 10

11 And this is just an example. Some small 12 experiments have been performed already about interactions between iodine, surfaces, 13 and air radiolysis products. This was realized in Germany 14 15 upon funding by us. And this was realized in a sealed different 16 flask where you have put atmosphere 17 representative of different conditions, different surfaces, and so on, iodine and irradiated that and 18 19 measured what you got after that.

Here maybe it is more interesting for you. 20 I said previously this is the difference between the 21 22 last two experiments, FPT-2 and FPT-3 that were performed exactly in the same conditions, except the 23 nature of the control rod. In this one it was silver-24 25 indium-cadmium. In this one, this was boron carbide.

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So, I showed on a previous graph the difference in gaseous iodine coming from the reactor cooling system between these two experiments. And this is reflected in these two peaks here, where measurements of points and calculations, positive calculations are solid lines. You can see this large difference, again, between these two experiments. Okay?

What is interesting is that despite this 8 9 large difference early in the transient, while you have got similar on some threshold level at the end of 10 is 11 the transient, Ι said similar because it 12 logarithmic scale. And if you look into more detail and the scattering within the points, the calculations 13 will, I said, similar. Okay? 14

15 And then we have performed these calculations with our code that is model of the access 16 17 system level code. And we have introduced in this code the interaction of iodine with paint. 18 This was 19 already introduced and we have also introduced what is aero-radiolysis products interaction with 20 due to And we have introduced, we have already the 21 iodine. We have introduced what was gained from the 22 models. various other experiments. And from our calculations, 23 24 we are not so bad as compared from the general 25 tendencies. What are used are not exactly the same

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but okay, we obtained also this very large decrease due to mainly interaction with paints and to destructions by aero-radiolysis products. For this, maybe it was an answer to a previous question showing that even with a very higher iodine from the reactor cooling system, maybe we are lucky and it is, in the long-term, decreased. But this needs to be confirmed and further analyzed.

9 Okay, maybe we will go further quickly As for boron carbide, while there could be a 10 now. possible impact of boron carbide degradation product 11 12 here on fuel degradation. While indeed the all of the codes are not able to reproduce the fuel degradation 13 in the FPT-3 experiment, we have some early fuel 14 15 degradation that is not reproduced by that. Maybe it is due to these products. 16

17 And also, there could be a possible impact on fission product chemistry. Could this be 18 an 19 explanation for this very high fraction of gaseous iodine at the break in FPT-3? I don't know. 20 Maybe it is because there was no silver-indium-cadmium. 21 Maybe it is because there was some carbonated fissions in 22 this boric acid. This will be tested in one of our 23 problems. 24

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What will be also tested are, I would say

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what has been tested is the oxidation of boron carbide in liquid and also will have degradation in oxidation of 30 centimeter boron carbide was.

This is just an example of oxidation of 4 5 liquid boron carbide stainless steel mixture. This is 6 the hydrogen production. And this is done. But this was an horizontal furnace. 7 Here was the mixture 8 here, at an angle. What you see here are projections 9 of bubbles. So it is not a gentle oxidation. You 10 produce gases or vapors within this liquid that 11 produces these bubbles. And you can see this is not a 12 gentle oxidation and so on.

is that 13 And what suspect these we projections can go to the surrounding walls of the 14 15 control rod. And these mixtures containing boron, iron and so would probably 16 carbons, on have 17 interaction with the zircaloy cladding and all this would probably have interaction and 18 mixture 19 distribution over proportion of the fuel, of the O2, 20 of the neighboring rods. So that is probably this come from would be a local effect, probably, not 21 generalized but a local effect. 22 And this will 23 will probably made rather low melting point temperature always going down. And this would contain 24 25 This is what we have observed in this PT-3. uranium.

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What air ingress, you probably know that in contact with degrading 6 air be fuel for may reactor different accidents, accident several scenarios, and also of coolant in shutdown situation, after melt-through of reactor pressure vessel and so 10 on.

What is known is that under very oxidizing 11 12 conditions with air ingress, ruthenium is largely This has been studied in detail by our 13 released. Canadian colleagues. Just because air ingress was a 14 designed by this accident for Canadian reactors, so 15 they looked at that in detail. And ruthenium acts as 16 17 a volatile fission product and is largely released from fuel. 18

What happens after that? 19 What has been seen is for ruthenium transport in the reactor cooling 20 There have been two sets of experiments 21 system. performed in Hungary and in Finland. And they both 22 23 show that part of this ruthenium is transported as a gaseous ruthenium tetroxide in the reactor cooling 24 25 system and not only as aerosol particles. That means

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that what will arise in the containment will be in majority are also particles but also gaseous ruthenium, ruthenium tetroxide. And radio-toxicity of ruthenium is very high, comparable to that of iodine in short-term and in caesium in mid-term. So, we have to look at that in detail.

7 Another point is not for reactor accidents 8 but for spent fuel storage pool accidents. So, if we 9 have a fast cladding oxidation in spent fuel storage 10 pool accident, temperature may increase to a level 11 sufficiently high to have a fuel degradation and 12 fission predictability. So that is another topic.

Well, once we have looked at IRSN, is ruthenium behavior in the containment. As we know, the way to get ruthenium tetroxide inside the containment, we say well, what will happen?

First thing, we have to do tests on the 17 ruthenium tetroxide absorption and desorption 18 on 19 surfaces in the containment better than with painted We made test without radiation 20 and steel surfaces. cements with ozone that also with 21 with a an irradiator. And 22 we have tested deposition, destruction of ruthenium tetroxide and also oxidation 23 of deposits of ruthenium dioxide that also deposit 24 25 from surfaces.

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From all of that, again, it is question of destruction and production processes. Destruction processes, destruction of ruthenium tetroxide. And creation is oxidation of deposits of ruthenium dioxide.

For the first series of tests we show that 6 a significant fraction of ruthenium remains gaseous. 7 8 Part of the ruthenium gaseous items is destroyed. Α 9 significant fraction remain gaseous. We are not implication 10 looking what is an for at а real 11 containment. Because when I say fraction, it depends 12 whether it is important or not, of course.

13Okay. There are some tests from liquid14phase from re-vaporization from liquid phase that are15still under way.

This is an example of the experiments. 16 This is an experiment. This is a small coupons. 17 The black deposit is deposit of ruthenium dioxide. This 18 19 is before it being in contact with ozone during one day and here is after changed color because that 20 ruthenium dioxide had been oxidized. And this is what 21 is done in the flask used for irradiation. 22 Same kind of experiment but with irradiation. 23

Last point is cladding oxidation by air. So that is for different kinds of accidents. We have

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cladding for different regimes and conditions. What we wanted to look at not only that but looking at the determination of the kinetic transition between the different regimes and also look at the role of nitrogen.

7 Just here to give you an example of what kind of thing we obtained. At the beginning, we have 8 9 a protective dense oxide layer. That is here. In that case, what controls the rate of oxidation if the 10 diffusion of oxygen within that layer and you have got 11 12 a parabolic low for the oxidation. Here you have got cracks. And below the cracks here is development of a 13 porous layer. And then diffusion here of course, is 14 15 no more controlling the process.

What is also interesting is to see these yellow nodules here. Those are zirconium nitrites that form at interface between the oxide layer and the nickel. And that probably have an effect on the nickel stresses in this layer and so on.

This image here, what is brilliant is a zone that is very porous. So here, nothing in here. And much more within the nitrite. In fact, when we are in this regime here, the kinetics is no more parabolic. It is more linear and even sometimes

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accelerated. So, faster oxidation. And we want to know that in order to know if I would say how much time we have in case of an accident, for instance for management measures.

Okay. The last point is some additional experiments on fission product release studies. There are existing data from small scale and integral experiments, while the measured release is strongly dependent upon temperature and oxygen potential and not only on temperature. That is an important lesson.

11 We saw that there was a need to extend the 12 data to high burn-up and MOX fuels. And also what we are doing is we tried to create and to elaborate 13 predictive models, not only correlations, in order to 14 be able to make predictions even for small fuel 15 evolutions. Not for revolutions but for small fuel 16 17 evolutions which predictive models we can probably tell what will happen. 18

Okay. And also what we will do is we will look at what was happening in past experiments. These are two views of two pellets having experienced true unyielding release experiments in the reactor program a few years ago.

We will now try to look at where are the fission products inside these pellets, in which phases

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179 1 they are. These are the waters remaining in the 2 metallic phases and things like that because we have 3 models to that but they are not validated. So we 4 tried to validate our model. 5 Okay. And also --CHAIR SHACK: These VERCORS tests are very 6 7 old, aren't they? 8 MR. CLEMENT: Yes, sure. 9 Okay, you are just getting CHAIR SHACK: 10 round to --11 MR. CLEMENT: Sure, sure. Okay, just from 12 conclusions. We have seen that there were some 13 unexpected phenomena for meltdown severe core accidents. They are coming from Phebus but also 14 15 observations from other programs. Some of the phenomena are still misunderstood or badly quantified. 16 17 Badly quantified is just because Phebus has been an integral experiment. So you observed the things, you 18 19 measure the things. But if you want to validate or 20 build models, you need more precise measurements. Okay? 21 22 So with that, we have already a large 23 level of uncertainties and what we have observed in our institute is that at least is that this has an 24 25 on the results of Source Terms assessment impact **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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180 studies. 1 2 So that is why this Phebus program has been built, in order to 3 reduce this level of 4 uncertainties. 5 So maybe I was too long. CHAIR SHACK: Are there any questions? 6 If there are 85 MEMBER ABDEL-KHALIK: 8 percent fraction of gaseous iodine that you have with boron carbide control rods is real, --9 10 MR. CLEMENT: Likely not. MEMBER ABDEL-KHALIK: -- what would be the 11 12 implication? MR. CLEMENT: Well likely not. 13 MEMBER ABDEL-KHALIK: Likely not? 14 MR. CLEMENT: Gaseous iodine interaction. 15 mean gaseous iodine interaction with boron 16 You 17 carbide? 18 MEMBER ABDEL-KHALIK: No. Ιf the 19 difference that you got, the 85 percent versus a few percent in the two cases, is real, --20 21 MR. CLEMENT: Yes. MEMBER ABDEL-KHALIK: -- what would be the 22 23 implication of that? MR. CLEMENT: Well, first of all, we have 24 25 to understand why. Okay? It may be that iodine **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

181 released from the fuel in the FPT-3 experiment did not have silver to react with, did not have cadmium to react with, did not have indium to react with. It may well be also that all caesium had reacted with boric acid to form caesium boride. So it may well be that it did not have caesium to react with. But this, we are not sure. In that case, it would be simply because iodine was left alone. But this is just a speculation. This is just speculation. We have to look at it in more detail. MR. LEE: I think the NRC view is that the boron react with water create boric acid. The acid capture all the cations. So, to rephrase what he said is that here are no sites for the iodine to combine So you will have -- that is why in FPT-3, you with. see an 85 percent gaseous iodine release for that test. But remember that this is a very small

20 bundle, representing a very small part of the core 21 experience and conditions where you have a before C-22 rod that is controlling the chemistry. But in the big 23 core, you will have different conditions in the core. 24 So, the iodine gaseous fraction going up into a 25 containment should be the mixtures that you encounter

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in the upper plenum and mix and then go out. So this so called 85 percent, you cannot take it directly and translate it to the reactor case.

4 That is why we need to have models to 5 understand what Phebus is doing. And then you can extrapolate it to the containment. So we cannot say 6 7 that his 85 percent has any occasion to our 1465 where 8 we said you should assume five percent. In our new 9 Source Term we said five percent gaseous iodine. That 10 85 percent, we are not concerned with that, at this 11 time.

MEMBER BROWN: But can you ignore it, onceyou have it? I mean, it's a big number.

MR. LEE: The thing is that it happens. We understand why it happens. So, in order for the reactor condition, you have to calculate the entire core behavior and determine what is the gaseous fraction in the containment. So it is not the 85 percent. It has to be less than that.

20 CHAIR SHACK: Yes, but if you have done21 that calculation, I guess, is the question.

22 MEMBER POWERS: I mean, there is more, the 23 scale was fairly abbreviated on that.

Two things to recognize is the boron carbide used in the experiment was not representative

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in configuration with like the a rod blade in a BWR. We have done that experiment with a control rod blade and we know that because of the high steel fraction, you don't expose boron carbide to steam the way they did in the experiment here, which resulted in a lot of boric oxide being released.

7 That leads to the argument that the boric 8 oxide really likes to combine with metals, so it 9 all of the counter ions that would sucked up 10 ordinarily react with iodine. They are just gone. 11 They are tied up as borates and allow gaseous iodine 12 to come into containment.

This particular is still undergoing 13 analysis but was also observed, and I think this was 14 15 explained in the previous visit, is that the gaseous iodide decayed in the containment at a rate that was 16 17 actually faster than the aerosol decay rate. So it is going into the solution. It is doing stuff. Once it 18 19 gets into the solution, then we start to handle it.

And it came down and it established this nice steady state again we observed in all of the other tests, which is really remarkable. You put in 85 percent, you still end up with the same steady state. And that is why the steady state has to be understood.

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184 What the ramification is that gee, assumed 1 2 in the past we could get by with kind of a crude 3 analysis of how boron carbide control blades behave in 4 reactor accidents and now we say, well, we can't be 5 crude. You have to got be fairly sophisticated. Just always silver-indium-cadmium control 6 like rods we could be treated with a simple failure temperature. 7 8 Now, we can do that. So we have to be a little more 9 sophisticated in our treatment of control rods across the board here. 10 Richard, do you want to 11 CHAIR SHACK: proceed? 12 Okay. Our presentation is going 13 MR. LEE: mostly on the iodine behavior itself. 14to focus Because last time I talk about the RCS behavior that 15 Clement mentioned here. But the start thing to talk 16 17 about is the expectation of what the iodine behavior in the containment and what are the Phebus findings 18 with respect to our expectations. And what are we 19 20 going to do about it in the near terms in one or two years to address the difference in expectation versus 21

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NRI for the past decades now since the

And I also want to say that we have been

findings and how we are going to scale it to the

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working

reactor conditions.

inception of participation with Phebus. So, our user office are well aware of the findings from Phebus and especially what it meant for the designed based accidents analysis.

5 Just to remind you there is about 750 million Curies of iodine in the typical core. 6 Mostly 7 all of our, nearly all of our reactors are licensed 8 under the old Source Term, the TID-14844, which is 9 promulgated in 1962. And you can see that very large gaseous releases versus the particulate which is only 10 11 like one percent. Okay?

12 Following the TMI, if you used that TID-1484, we know that we didn't see those gaseous iodine 13 from the TMI accident. There of 14 was а lot 15 experiments, separate effects experiment conducted over the world. And from the experiment, we will 16 17 still see that there are qaseous iodine still appearing. 18

19 So, in the subsequent, in 1995, when we go to the alternative Source Term, NUREG-1465, we set you 20 will assume for you analysis, on the alternative 21 Source Term, you should assume at least five percent 22 23 in gaseous iodine. And the iodine, five percent gaseous iodine you, you see the molecular iodine or 24 25 organic iodine. Basically, they combine to add up to

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be five percent. And the other 95 percent is aerosol.

2 And I only -- there are actually four 3 periods of releases. It is no longer a constant like 4 the TID-1465 is a constant source, you have a 5 different type of releases. You have a gap releases, you have an in-vessel releases. And then when the 6 7 lower have failed, you have an ex-vessel releases and 8 subsequently, there is а late in-vessel then, 9 But for the DBA analysis, we only use the releases. first two in terms of the percentage of the inventory 10 that come out. We use that fraction to look at the 11 12 outside dose, the teddy for the boundaries and so forth. 13

Now, in the iodine, the caesium -- the form for the iodine is assumed to be CSI and I think Bernard has discussed that in Phebus is that we are finding it differently.

Now, what happens to the iodine in the containment? Of course, we know that the aerosol gravitational settling, and these are the phenomena that we postulated for the behavior for how the aerosol can be removed by natural processes and also by safety system like the spray or the suppression pool or the ice bath and so forth.

But during that period for the two

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1 decades, they are persistent, constant research in 2 Europe, especially in UK, France, and other place continue to study the gaseous iodine behavior. 3 That 4 is not so new. Most of our studies were in the early 5 90s, basically mostly at Oakridge, Tom Crest and 6 Company. Usually, NRC tasks them to look at certain things. And they finish and we start. But there is a 7 lot of studies still going on in Europe. 8 So, we have 9 to be mindful of what the findings are from those. And those are being factored into our understanding as 10 11 of today.

But we also know that the iodine chemistry 12 is very complicated and especially in the aqueous 13 The iodine has about eight oxidation state, 14 phase. 15 which most elements you don't find those. So, we know that some people spend entire career from the day they 16 get their Ph. to the day they die still working on it 17 and it is never finished. But for our use, we need to 18 19 find out what are the important things.

And in early 1997, we have commissioned Oakridge to look at the iodide chemical form on the severe accident. The iodine evolution and pH control, we like to know what does the pH control do to the gaseous iodine partitioning between the water pool and the atmosphere. And those have been studied and that

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actually formulates the basis for the 1995 Source Term that the staff have published.

Now what are expectations? We said all the particulate and gaseous iodine released in the containment usually end up in the sump. And then we said, if the sump remained inclined, that is when the pH is greater than seven or more, these iodine should not be coming up. Okay?

9 also know that there other We are processes that create acid, cable installation and all 10 11 of those things. We also studied that one, too, 12 experimentally at Oakridge and we published some reports in that area. But if the sump become acid, 13 then we know that these volatile iodide will come back 1415 out. And we also, I think there was a model that we developed to look at what type of materials get 16 released from the reactor under certain accidents and 17 how much quantities you need to change the pH up. 18 We 19 have such models developed. Tom Crest has done that for us, too. 20

Now, just to remind you long time ago, NRC funded a lot of experiment like the thing Bernard mentioned about these taking different elements and combine them and study them, radiate them at different temperature and find out what the products are. We

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have done many of those experiments. This is not to put you down but we found out that there are so many infinite combinations that you need to do and the time and the money will be enormous. So we abandon that one.

The second thing we did is said we wanted 6 7 to develop a vittorial code to look at all the 8 thermodynamics in the program. And once you run the 9 code, you find out that you get infinite amounts of 10 species coming out, which we don't know which one is correct or not. So, Phebus came along and we said, 11 12 this experiment at least will give us some guidance of what are the things that we really need to model. 13 This is where we are today. 14

15 If you look at this here, I think you mentioned that this has a control rod that 16 is different. And this has an alkaline in the sump. 17 And then does the temperature also control that they do 18 19 here is basically it is condensing but later time, it 20 starts evaporating in the sump. We also know from separate facts that if you evaporate the sump, you 21 know that mass transfer, you should have more iodine 22 coming out from the sump into the atmosphere. 23

We have done those separate effect tests, though. These are the things that we like to see what

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is people telling you but not also tell you that these are the period of time that the releases phase. You have the first aerosol phase, second aerosol phase. This tells you the time for these four tests. There is actually another test we have done but has no relevancy. There is no containment involved so we didn't put this on.

8 And then you have the chemistry phase 9 And these are the washing phase that Bernard here. mentioned about is to wash down the those aerosol that 10 settle down at the bottom part of the containment and 11 12 wash it into the sump. And then this is the chemist's completion of the chemistry phase that takes actually 13 And for these two tests, you see that they 14 days. 15 changed the condition from condensing to evaporation.

The next view basically summarize what the durations of the release phase and the aerosol phase, and the chemistry phase for all these four tests that we have just shown here.

Now, Phebus containment is quite large, in the sense of fission product experiment. There is about ten meter cube of volume in there. And these are the treatment then so he is talking about. There is one dry part and there is a wet part. They have to have a dry part in order to control the condensation

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191 1 on the condenser. It is a requirement. And the 2 fission products and the gas particulate are released into the containment here and they have 3 а sump, 4 simulating the sump of the containment. 5 look And when we at the aerosol sedimentations, we found that the time it takes half 6 of the aerosol to disappear for all of these tests is 7 8 around 1.5 hours. And then what happened in the gaseous 9 10 phase is basically these are the reactions you can 11 expect that the  $I_2$ , the ozone generated in the air due to irradiation put this  $I_2$  into this  $IO_x$  and then it 12 will diffuse into this condenser or into the sump. 13 So the breakdown of these parts are around 15 percent to 14 15 the condenser and about 85 percent to the sump. Now of course, the water chemistry is very 16 17 complicated. This is only a few examples to show you is that it can have three different things happen. 18 19 You can have molecular iodine come up from the sump. You can have stable AgI. Stable and it was retained 20 and stayed in the sump, it would not come out or you 21 can have organic gaseous iodide coming up. 22 23 MEMBER ABDEL-KHALIK: Doesn't the deposition process depend on the length scale of the 24 25 experiment? **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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192 MEMBER POWERS: In a -- it's treated as a 1 2 well-mixed environment. You can have a length scale 3 in there but it is not very important. 4 MEMBER ABDEL-KHALIK: He's talking about 5 deposition of condensers by diffusiophoresis. Doesn't that depend on the length scale? I doesn't? 6 MEMBER POWERS: Ιt depends the 7 on condensation rate. 8 9 MEMBER ABDEL-KHALIK: Now, condensation 10 rate can depend on the length scale. MEMBER POWERS: I depends on the kind --11 the aerosol physics is all modeled in terms of the 12 condensation rate. 13 MEMBER ABDEL-KHALIK: So the fact that 14 15 this sort of vessel is not really prototypical in terms of length or volume scales, does that --16 17 MR. LEE: With the results. If you say that this is ten meter cube so basically, if you 18 19 compared it with the last containment, the surface would be distorted. It is much larger than the real 20 one, of course. But they did try to scale it to sort 21 of resemblance to a 900 megawatt electric, you know, 22 23 the French PWR and leaving it in the containment part of it. 24 25 MEMBER POWERS: The only reason that you **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	would worry about the scaling here is if the phenomena
2	varied with scale. Well, I tell you, they vary. And
3	there is no evidence of that.
4	I mean, you get condensation on surfaces.
5	If you get gravitational settling. Bigger scale, you
6	get condensation on surfaces, you get gravitational
7	settling.
8	MEMBER ABDEL-KHALIK: I mean, they are
9	coming up with time scales for these processes.
10	MEMBER POWERS: Oh, yes, don't count that.
11	The time scale will change.
12	MEMBER ABDEL-KHALIK: Right. How much do
13	I believe that? I mean, how relevant is that?
14	MEMBER POWERS: For a reactor accident, it
15	will be different. They are all different. It
16	depends on the sequence and everything.
17	MR. LEE: Now, we also have experiment to
18	show that the sensitivity to pH, what are the
19	predominant iodine forms in the sump? Okay, and you
20	can see that at high pH, this will be your dominant
21	form so you will have the molecular iodine coming off.
22	But on this side here, it is not. It has become a
23	stable form. So, these are some of the things that we
24	have studied previously.
25	Now, let's look at the results here.
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The aerosol sedimentation we said is around 1.5. This one is a little bit large. We are not quite sure. This data is still preliminary.

7 Now, you look at the silver and iodine 8 concentration in the sump, these are very large 9 number. So is this one. So you expect that this AqI should dominate, so it should be stable. There should 10 be no gaseous iodine coming out into the containment. 11 12 So, our expectation for this case, this case, this case is that all of these should be no. There should 13 be no gaseous iodine in the atmosphere because you 14should form a stable silver-indium iodide in 15 the precipitate out. Here, you don't expect it because 16 17 you have an alkaline sump. You should be controlling because that is what we said. Keep the pH seven or 18 19 higher, then you should not have any gaseous iodine in the containment. 20

21 MEMBER ABDEL-KHALIK: When you say no, 22 that means zero, absolute zero on the first row? 23 MR. LEE: On those two, yes. It should 24 not be coming up from the sump. This is what the 25 model says.

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1	MEMBER POWERS: At worst, what you should
2	see is as the gaseous iodine comes in and starts at
3	some level, it should come off about the way the
4	aerosol does. And it should just keep going towards
5	zero.
6	MEMBER ABDEL-KHALIK: Nothing at all?
7	MEMBER POWERS: No iodine, eventually.
8	MR. LEE: Look at here. Right? You see
9	the gaseous iodine decay is much much faster than the
10	aerosol. This is a more simplified one that Bernard
11	showed earlier on FPT-1. We show you two. So you see
12	that in the degradation phases came in and it decayed.
13	It decayed very fast.
14	And look at the aerosol here. This is the
15	AgI. You can see the slope here. This is the washing
16	phase. It went back up, as Bernard mentioned earlier,
17	and then it decayed back again.
18	Now, let me go back to the conclusion on
19	what we are understanding from Phebus. Related to the
20	aerosol, we think that in Phebus experiments show that
21	our understanding of aerosol is very good, except of
22	course, where the CSI is the only one exists or not is
23	different. The other forms, we recognize that you
24	have these types of other, other than CSI for iodine
25	form. And in other words, these are quite good in our

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understanding.

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2 Now, as I told you right before, we have done some other tests related to the increasing in the 3 4 sump. When it is condensing, you are supposed to 5 remove the iodine in the atmosphere into the sump. When you are evaporating, the mass transfer will 6 7 promote the iodine from in the solution to come out 8 But this is what you show from Phebus. into gas. 9 When the sump is condensing, it is higher and when it is evaporating, it is lower. 10 This is not what we expect from our model. 11

MEMBER POWERS: That is not what youexpect, it is precisely the opposite.

MR. LEE: Now, in the third bullet, we 14 also found that the switching between molecular iodine 15 and the organic iodine is also quite complex as not 16 mentioned in the FTP-1. It started with organic 17 iodine and this gets replaced by molecular iodine. 18 19 But in other subsequent tests, that was not the case. The molecular iodine was the predominant one. 20 The organic iodine is only like 20 percent of 21 it throughout the entire tests. 22

So, what we conclude now is that is the sump pH controlled is whether the AgI is there or not is really not the driving force for what we observe in

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1	the iodine chemistry, gaseous iodine in the atmosphere
2	of the Phebus containment. We believe that the
3	painted condenser played a key role in the evolution
4	of the iodine in what we observed in Phebus.
5	So, you can say that the condenser
6	actually really simulates some of the cold surfaces
7	you see in our reactor because they are colder
8	surfaces as the steam comes out it condenses on
9	different surfaces. And those surfaces are not the
10	ones that we can do pH control.
11	MEMBER SIEBER: What is the products of
12	the paint interaction with iodine?
13	MR. LEE: That is what we are trying to
14	sort out now.
15	MEMBER SIEBER: I mean, that is an
16	important consideration, to my mind.
17	MR. LEE: That is the key things that we
18	are studying in EPICUR and these follow-on programs.
19	So, what are the hypothesized mechanism?
20	First, is the gaseous iodine and the aerosol gets
21	swept onto the painted condenser by steam condensation
22	or even by other means, diffusions, not just by steam.
23	Then, it has to be dissolved very rapidly
24	onto the painted surfaces. Because in Phebus, they do
25	drain. They collect the condensate and then they
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drain it out into the sump. So the question raised is that how does the iodine dissolve into this paint? And there are different views about the paint, the paint surfaces because the paint surfaces are not even. So there are some water pools trapped into it like shown here.

So we can go into here, so the chemistry 7 can develop in those pools or does the chemical or the 8 9 iodine react with the polymers on the paint? And then also, paints, as you know, is a polymer mixtures with 10 11 solvents. So basically maybe they didn't finish reacting, then iodine may react with some of those. 12 Because you can see that the organic iodine, the big 13 sources of organic iodine coming from Phebus is really 14 15 from the paint. That is why, that is where the carbon 16 is.

And then the next thing that you have to find is that after it gets absorbed, we need to find out how does it come out? Gas in what form? Was it molecular or was it organic iodine?

And then also Bernard mentioned in the atmosphere, you have radiation, so these things get reduced and there is a destruction part related to the forming, they may form some very fine particles and these so-called iodine particles could also migrate to

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the condenser or settle. And these are the two last points that we talked about.

So this is a pictorial of the view of what 3 4 how iodine interacts with the paint, deposition as 5 well as it coming out. So these are very complicated pictures and models that we can develop. But the 6 7 problem is that we need to have data to support it one 8 way or the other, even though you can hypothesize many 9 mechanisms, whether you have it or not needs to be 10 supported by data.

Another thing has to do with the Phebus scaling aspect because it is distorted. I cannot take the data from there and say that this has happened in the real reactor. So, we have to have models to do the extrapolation. But in order to validate our model, we need the data.

17 So that is why, we think there are about six mechanisms that at least we should evaluate. 18 The 19 first one is that Phebus remember, it is not а concrete containment. They use steel as containment 20 because from test to test you have to clean it up and 21 then prepare for the next test. So, one can argue 22 that the source of our iodine is not from the paint, 23 but from the steel. But this can be sorted out very 24 25 In EPICUR they are going to conduct a test to easily.

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see which one is right. But we still think the steel does not play a big role in terms of the iodine behavior in the containment.

4 The second hypothesis is to understand 5 what is happening on the pain film itself. And we also want to know how much is the quantity you can 6 absorb onto the paint? The amount if important. Ιf 7 8 you get only like one or two percent, we think that it 9 is not going to be much of importance for the 10 regulatory aspect, from the regulatory point. The 11 reason is that you see that every time in Phebus you 12 perturb some of the system, you can see the iodine either decrease or come up but you go back to another 13 state, to the steady-state condition again. 14

15 So, in other words, in the containment, in our containment, if there is a leakage, you are 16 But once you dilute the 17 diluting the atmosphere. atmosphere, the paint can be a source of iodine so you 18 19 couldn't put it back out into the gas phase. So basically, over a long time, you are going to pump out 20 all of the iodine that was absorbed onto the paint. 21

So what we would like to know is what it the amount got onto the paint because if you get an amount larger than the five percent that we said in the alternative Source Term, we will need to address

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it. So, that is another thing that we need to look at.

But this is too complicated study for the EPICUR to look at but we are also participating in the Canadian program that is just started in Chalk River in the study of iodine chemistry. And over there, we are going to ask them to characterize much more deeper than what EPICUR can do.

9 there is also different Now, aspects related to the paint reactions with iodine. 10 As you remember, there is a dry part, there is a wet part. 11 12 And this -- okay, so basically the EPICUR is going to look at the coupons. That is what Bernard is talking 13 about. This is basically for the looking at the dry 14 15 condition. What we want to concentrate, look at, is the wet condition. So we will be -- I think the 16 17 Canadian is going to do that and not you. Right?

The hypothesis number four is that 18 we 19 would like to see is that the formation of the socalled fine particles in the atmosphere that 20 the French believe is the one that they need to study and 21 in the study of these fine particles, I think we 22 pointed out that they are looking for instrumentation 23 for looking at these particles. And Dana pointed out 24 25 that the oceanographers have done a lot of work in

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that area. They have produced some very good instrumentation of doing that and perhaps they can adopt it to study that aspect.

So basically, it is try to find out in the atmosphere, in the radiation field, you can form these fine particles. How does it form? Does it even form at all?

8 And then the fifth hypothesis is 9 basically, if it is formed, how does it get settled? 10 Does it go to the condenser or was it settled by 11 gravity.

12 The sixth has to do with the paint, the aged paint because you know in our reactors the paints 13 are not band new. So we need to address the 14 15 applicability to this aspect. They are two different opposing view. The Canadian view was the first one 16 and they said the interaction has to do with, involved 17 with the residual solvents. But that is not the case. 18 19 The French view was different. That's the second point but they need to test out which one is correct. 20

So, in other words, beyond the EPICUR program that Bernard had mentioned to you, we are participating in the Canadian one as well. And these are the areas that we mentioned earlier, that these are the points that we need to address.

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1	And the characterization of the surface is
2	very important because you need to understand what
3	you have first before you and see what comes out and
4	what reacted.
5	So, what is NRC plan for the next one or
6	two years?
7	CHAIR SHACK: That was quick. So the
8	debris that you are really worried about is paint
9	chips? That is your primary concern?
10	MEMBER SIEBER: Or paint on the wall.
11	MR. LEE: Not necessarily, no.
12	MEMBER POWERS: In fact, it is likely to
13	be rust.
14	CHAIR SHACK: Just because there is lots
15	of it.
16	MEMBER POWERS: Well not because rust
17	is fairly famous for being able to absorb iodides.
18	Most things don't absorb iodides but rust does. And
19	what we have supplied with the Canadians is what you
20	guys used for your filter blocking? We just got the
21	material from you and we are asking, put all kinds of
22	junk in the water, find out what goes where, and then
23	sort out which one is the important thing.
24	So, we are going to put a junk pile in the
25	water with some tag stuff. My guess is that the bust
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will be as important as paint. Zinc would be very important. Zinc oxide really likes to suck up iodine. That is my guess. But is easier just to put everything in there, tag it, and go find out what absorbed where.

6 MR. LEE: You know, most of the water 7 chemistry that we did were with distilled water. So, 8 pure water does nothing else in there. You have a 9 radiation field, you have certain things you put in 10 and you look at what is in liquid and what came out. 11 So, it is actually a controlled study.

12 And the reason that, what Dana mentioned that we asked the Canadian's to look at all of the 13 zinc oxide and rust, the motivation for that is that 14 15 you know that the PBI is moving from silver-indiumcadmium rod to propulsion rod. So you will not have 16 17 the Ag to bind the iodine in the sump. So we are We think the looking for alternative mechanism. 18 19 iodine will go to the other things. And that is what we say, but you need to have data to back you up. 20 So we are asking the Canadians to do it. 21

We are also asking the Canadians to look at the iodine binding with the insulation which has huge surface area in the reactor case. And we think iodine also go there and bind it and it could be very

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stable. So you will not have these iodine coming back out. So we are looking at many problems.

3 So basically, the last one is that the models have been assembled, I believe, but we need the 4 5 data to validate it. Between the French and the Canadian, we think within the next two years, we will 6 get all of the data needed to validate the models. 7 Using the same model, you need to understand the 8 9 prediction under the Phebus case and we know that the model can predict that. And then we use the model to 10 11 extrapolate to the PWR case so we can say what is the 12 iodine fraction you will find in the qaseous containment, under basically all we are looking at is 13 Really, we are not interested in severe 14 a DBA. 15 accident stuff. This has nothing to do with severe accident. 16

And after that, we are going to publish and peer review it. And then at that time we are going to decide whether we are going to get rid of the pH control that we put into the 1465. Because there is a pH control requirement written in it, if they are going to use the revised Source Term.

So, that is all --

24 MEMBER MAYNARD: What kind of time frame 25 are you looking at? You say looking at it, you may

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1 have been able to redefine pH requirements or 2 something. Are we talking like five years from now, 3 are we talking a year? What are we talking about? 4 MR. LEE: We are talking about roughly two 5 years or so. Of course, they have degenerated data, so we have no control over that part because we can 6 7 ask them but it doesn't mean that it will happen because this is a joint model. They have their own 8 9 things that they need to do to address the French 10 regulatory aspect of it. 11 There is other partners in the French The thing with the CS and the 12 program. same behavioral iodine project. 13 MEMBER MAYNARD: It just, this seems to be 14 an important aspect dealing with a situation that may 15 not address it again in a timely manner could have 16 So, that is -- I would 17 more consequence than her. urge you to move along quickly on that. 18 19 MR. LEE: Thank you. MEMBER SIEBER: From what you have learned 20 so far from the Phebus program, does that alter your 21 confidence in the alternate Source Term? 22 23 MR. LEE: Yes. 24 MEMBER SIEBER: And what -- could you 25 explain that a little more? Does it change your **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

207 1 confidence? MR. LEE: The aerosol behavior are fine. 2 3 And then we need to make sure that that five percent -4 - if you look at this, basically there is nothing in 5 the gaseous iodine fraction, basically remains around under the five percent. Okay? Forget about FPT-3, 6 which has 85 percent. But you can see that even that 7 8 one decayed very fast. If you look at the chemistry 9 phase, it is still very low. 10 MEMBER SIEBER: Right. 11 MR. LEE: Okay? That 85 percent is during 12 the release degradation phase, not the long-term The long-term behavior for all these tests 13 behavior. are low, lower than the five percent that we are 14 15 prescribed in the institution goals. Now, the only thing we have that remains 16 that we would like to address is that we need to, 17 whether we should have the pH control captured there 18 19 or not. need -- paint has become 20 also We an important role. We would like to know how much got 21 into the paint because it is only if it is less than 22 23 five percent, we really don't care. If it is more than five percent, we have to do something but this is 24 25 too early a time to postulate. **NEAL R. GROSS** 

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1	MEMBER ABDEL-KHALIK: Reaching that sort
2	of steady-state takes a long time. So, early
3	containment failure, you know, these large numbers,
4	may have relevance.
5	MR. LEE: But early containment failure is
6	not a DBA.
7	MEMBER POWERS: Well the point is, we have
8	reached that stage very quickly.
9	MEMBER ABDEL-KHALIK: I thought it is
10	days, based on
11	MEMBER POWERS: No, it's just a few hours.
12	MEMBER ABDEL-KHALIK: Oh, it was faster
13	than that, wasn't it?
14	MEMBER POWERS: As soon as the degradation
15	phase is over, it is essentially three hours.
16	MR. LEE: Well look at the bundle
17	inventory. In our alternative Source Term, we have
18	five percent. This is the whole five percent.
19	MEMBER ABDEL-KHALIK: The other concern I
20	have is, you know, the word validation of models.
21	There are so many complicated interacting phenomena
22	and with a limited set of experiments to actually be
23	able to identify these separate effects. I'm not sure
24	that that is possible.
25	MR. LEE: But I think that is the reason
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1	from the Phebus and effects experiments, to give you
2	some guidance what you think are the important
3	chemical species that you need to worry about. So,
4	the separate effects from the target, it is that part
5	of it.
6	MEMBER ABDEL-KHALIK: You are not trying
7	to validate models qualitatively. You are trying to
8	validate models quantitatively.
9	MR. LEE: Right. The simpler effects are
10	supposed to be more quantity, quantification, yes.
11	MEMBER SIEBER: You might be better off
12	after you are done than you were before.
13	CHAIR SHACK: It's very interesting. Does
14	the committee have any more questions?
15	MEMBER SIEBER: I would like to comment a
16	little bit to Jack on his question because I think it
17	was a good question. If I were to characterize the
18	Phebus program, I would say it has substantiated a lot
19	of the judgmental points that had to be made at the
20	time the alternate Source Term was formulated. That
21	was formulated based on a lot of computer code runs
22	and separate effects tests that were had. And I would
23	say it was well done. Dr. Reid was one of the people
24	authoring it.
25	And when it came down to gaseous iodine,
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at the time there was a huge pressure to claim that all of the iodine coming into the containment was just particulate but they had this nagging occasional experiment. It would show a little gaseous iodine and nobody knew really what to do with it. And so they stood out on a limb a little bit and they took a lot of static from it by putting in that five percent gaseous iodine.

9 the one area where the Phebus And SO experiments have come back and said well, you were 10 11 right in doing that but you were wrong about the 12 mechanism. And that is what they are trying to sort out now, that here is a gaseous iodine compound 13 cornered. It is behaving differently than we thought 14 15 at the time and they are trying to sort it out.

And it really is a question of magnitudes 16 If we are dealing with five percent of the 17 here. engaging in this iodine 18 inventory qaseous 19 concentration, that's quantity. It doesn't change the regulatory stance at all. If it is 20 percent of the 20 inventory, then you have got a big problem. Okay? 21 Because there are just so many Curies of iodine in 22 23 these first -- I mean, after 30 days, you don't care but in the first two weeks, you have got a real 24 25 problem.

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But in general, I would say the Phebus 2 tests have come back and said yes, you are about right in your ultimate. So when you are about right in things, there are lots of details that we like to 5 agonize over. You know, like we tend to under predict the deposition immediately above the core and over 6 predict it in the steam generator. The net result is 8 we get it about right in the containment. So, you are 9 worried about those sorts of things. 10

CHAIR SHACK: That's comforting.

11 MEMBER POWERS: And the chemical 12 speciation and whatnot is fluctuating. And some of these things have ramifications and some of them you 13 don't care. I mean, the chemists go crazy but nobody 14 15 else cares.

> CHAIR SHACK: Thank you.

MEMBER MAYNARD: I have got a question as 17 far as relative risk to the entire fleet right now. 18 19 We have some information that may indicate that pH doesn't have the effect on the iodine as what we had 20 originally thought. Right now, we know that a lot of 21 the buffering that is used in the plants do cause 22 So we have a known problem. 23 problems. We have a potential not -- we have a potential solution and 24 25 maybe that buffering is not needed.

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Really, for the next couple of years here, are we better off with the buffering waiting for the results of these tests or are we better off to remove the requirement for the buffering? If the tests don't confirm it, then we can address do we need to put a backer on it. We have a known problem now that we can deal with.

MR. LEE: I think in an hour, we will answer that question.

10 MR. SCOTT: Mike Scott, NRR and responsible for the resolution of Generic Safety Issue 11 12 191. We do not believe that it is a slam dunk to say that removing a buffer is the net right thing to do, 13 based on the information available at this time. 14

15 We encourage and support the Office of Research in investigating this issue. 16 However, we do not think it is ripe for a rapid regulatory change to 17 remove the buffers at this tie. As you all are aware, 18 19 the licensees are taking actions to deal with the buffer situations that are out there now. 20 And the situation is variable, very much, depending on the 21 materials that are in the containment and the buffer 22 that is chosen. 23

24 So again, while we are very aware of what 25 is going on here, we don't think a precipitate action

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213 here to remove the buffers is appropriate at this 1 2 point. 3 MR. LEE: In our overall evaluation, we 4 also need to address the spray. Because the question 5 raises that in the spray we know that if you have a high pH in the water, it will spray down and it will 6 capture the iodine. So the question raised is even if 7 8 you take off the pH earlier, do we need to reintroduce 9 a pH at a later time. 10 MR. SCOTT: Yes, the other thing is that 11 is that --LEE: Another thing you have 12 MR. to address. It is not just one thing. 13 MR. SCOTT: -- our friends in the Division 14 15 of Component Integrity NRR tell us that removing the buffer will not remove chemical effects. 16 It will 17 change the chemical effects. Yes, there are some other 18 MR. LEE: 19 chemical effects that doesn't go away. MEMBER MAYNARD: I understand all that. 20 And I understand that we are no where close to having 21 22 a slam dunk. But at some point, you have to weigh your relative risk and decide what is best right now. 23 If it was 50/50, I could understand that but if it 24 25 90/10 or 80/20, I would tend to want to lean towards **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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MEMBER BROWN: Maybe Mike, you can elaborate a little bit why, that statement you made. I mean, yes, there are the chemical effects, certainly but maybe there are a few other reasons why what you are saying is --

8 example, and this MR. SCOTT: As an 9 doesn't directly relate to the PWR buffers, but it is 10 sort of a similar subject. We just went on a trip to 11 Japan to discuss some testing results with Japan 12 Nuclear Energy Safety Organization. And they had done testing Japanese representative 13 in a BWR some environment. And they did see some chemical effects 14 15 with the iron oxide. And I am certainly not an expert enough to talk about those in detail. 16 And we are 17 looking into that situation as to whether it applies to the U.S. BWRs and we don't know. 18

19 But the point is, is that they observed some chemical effects in a buffer free environment. 20 So again, we don't want to jump into this. 21 At the 22 same time, we are not ignoring it and we are encouraging research to move forward on it but that we 23 have had discussions about just the very same thing 24 25 that you mentioned. You know, should we take

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immediate action to change course with regard to Generic Safety Issue 191 because of the preliminary information from Phebus and the answer was, based on where we stand now, no we should not. But we will get smarter. As you all fully

6 know, we have been getting smarter and smarter on GSI 7 191 and so, something may come up that changes that 8 situation. And so we are going to keep our eyes open. 9 We are also not holding up the other corrective 10 actions that the licensees are being asked to take to deal with chemical effects waiting on this issue to be 11 12 resolved because we think that would be imprudent as well. 13

CHAIR SHACK: Okay. Gentlemen, I hate to interrupt this discussion but some of you may want to go eat lunch before the cafeteria closes.

17 (Whereupon, at 1:18 p.m., a lunch recess18 was taken.)

19 CHAIRMAN SHACK: Our afternoon session 20 begins a little behind schedule but not too far. Our 21 next topic is a draft NUREG on PRA methods for digital 22 systems. And George is going to be leading us through 23 that.

MEMBER APOSTOLAKIS: Thank you, Bill.

## 4) DRAFT NUREG/CR REPORT ON PRA METHODS

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1	FOR DIGITAL SYSTEMS
2	4.1) REMARKS BY THE SUBCOMMITTEE CHAIRMAN
3	MEMBER APOSTOLAKIS: We met with the
4	staff, the Subcommittee on Digital I&C met with the
5	staff, and researchers from Brookhaven National
6	Laboratory on April 17th doing this report, which is a
7	main product of the project that focused on additional
8	PRA methods. I think that is an important thing to
9	remind the Committee.
10	First of all, this is part of the work
11	that the agency is doing on digital I&C because many
12	tasks that the senior-level committee would have been
13	briefed on and so on, but when it came to risk and
14	reliability, the agency had two projects. One was the
15	one we will be reviewing today.
16	The purpose was to look at so-called
17	traditional PRA methods, event trees, fault trees, and
18	they lumped Markov models in the two, and see how
19	useful or whether they are capable, to begin with to
20	deal with digital I&C systems.
21	And the second effort, which is not part
22	of today's meeting, has been reviewed by this
23	Committee. That was when representatives from Ohio
24	State University came here. And the task there was to
25	use so-called advanced methods, which really meant
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217 1 simulation methods, but methods that are not 2 user-friendly PRAs. 3 So this two-pronged approach has been 4 implemented by the staff. I think the major 5 conclusion of the work that these guys are going to present is that the traditional methods by themselves 6 7 are not sufficient. So they borrow a little bit from 8 simulation. 9 And, without further revealing anything 10 else so that Alan will just get up and leave, I will turn it over to Mr. Kuritzky unless somebody else 11 wants to talk first. 12 MR. KURITZKY: Okay. Thank you very much, 13 Dr. Apostolakis. 14 15 4.2 BRIEFING BY AND DISCUSSIONS WITH REPRESENTATIVES OF THE NRC STAFF AND BROOKHAVEN NATIONAL LABORATORY 16 17 MR. KURITZKY: I am Alan Kuritzky with the Office of Research, Division of Risk Analysis. 18 And 19 with me today is Louis Chu from Brookhaven National Laboratory. He's the principal investigator for this 20 work up at BNL. 21 Also involved with this work are Gerardo 22 Martinez-Guiridi and Man Gua, neither of which could 23 I will go ahead and do the 24 be with us today. 25 presentation on the work that we have done so far on **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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218 1 this project, as Dr. Apostolakis mentioned. And Louis is here to help out with any detailed questions that 2 3 the Committee members may have. 4 As Dr. Apostolakis mentioned, we briefed 5 the Subcommittee in an all-day meeting a few weeks ago and delved into a number of the details on this 6 project. What I am going to go through today is just 7 8 to identify the objective of the work and where we 9 stand with the project. The primary focus of my discussion today 10 will be on the contents of NUREG/CR-6962, which in 11 12 draft version was provided to the Subcommittee. Also, we are going to talk a little bit about the insights 13 that we have from the first benchmark study. 14 As soon as the draft NUREG was completed 15 back last year, we nearly started going forward with 16 the first benchmark study. And while we don't have 17 anything documented yet on that work, we do have some 18 19 important insights to share with you. Also, based on the feedback we received 20

from the Subcommittee a few weeks ago, we have identified a few changes to the work. And I will discuss our response or the staff's response to that feedback in this presentation. Lastly, I will just wrap up with the remaining steps of the project.

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Okay. The objective of this work, echoing to some extent what Dr. Apostolakis said, is to determine the existing capabilities and limitations of traditional PRA methods for modeling digital systems.

5 And in defining traditional methods for 6 this project, methods that are we mean 7 well-established, well-used in the community, but 8 specifically methods that do not exclusively account 9 for or address the interactions between the digital system being modeled and the plant physical processes. 10 Some of the other methods that you heard previously 11 12 from Ohio State University and others do address those specific types of interactions. 13

The ultimate goal for this work is to support the development of risk-informed decision-making and review guidance for digital system models and also guidance for including such models into plant PRAs.

19 As I mentioned, NUREG/CR-6962 documents the work we have done on the initial activities in 20 21 this project. This project is going to involve a series of NUREGs, NUREG/CRs, this initial one as well 22 as one each for the two benchmark studies that we are 23 going to be undertaking. Those benchmark studies 24 25 involve a digital feedwater control system and a

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reactor protection system.

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The contents of NUREG/CR-6962 include the set of what we now call desirable characteristics for reliability models. We have identified a number of aspects that we believe would be things we would be looking for in an ideal digital system reliability model.

8 The NUREG also documents the process that 9 we are using to apply the event tree/fault tree and 10 Markov methods to the first benchmark system. It also 11 identifies some of the limitations and capabilities of 12 the traditional methods and gives some preliminary 13 areas for additional research.

One thing I do want to be very clear on is 14 15 that this project is examining the existing capabilities and limitations of these methods. 16 So it's not intended to advance the state-of-the-art. 17 Therefore, things such as the quantification of 18 19 software reliability are not within the scope of this project. 20

Lastly, as I mentioned before, we have gone forward with the first benchmark. It's nearing completion. And we will also talk a little bit about that later.

Okay. In the NUREG/CR, chapter 2 goes

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over this list of desirable characteristics to include in a digital system model. These characteristics were grouped together in about nine different bins. They address most of the key aspects that you would expect to see in a digital system reliability model. Ιt covers things such as level of detail, dependencies between the systems or within the system, better modes identification, documentation, all the general aspects.

list of characteristics was 10 This put together based on the knowledge and experience of the 11 12 study team members, who are experienced in both the PRA and have a fair amount of experience looking 13 through digital They also involved 14 systems. а 15 literature review of things such as journal articles on probabilistically modeling digital systems, 16 NRC 17 related to digital systems, and reports the new reactor PRAs, which do include models of digital 18 19 systems.

The initial list of these characteristics 20 was the subject of an external peer review panel 21 meeting that was held up at Brookhaven last spring. 22 23 And in that meeting, there were quite а few practitioners from the areas of PRA, people with 24 25 familiarity in digital systems, people from national

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222 1 laboratories, from the industry, from international 2 organizations. And that review meeting resulted in a 3 4 number of substantial changes to the list of desirable 5 characteristics or, as they referred to back then, it evaluation criteria. I will get into the 6 was 7 semantics change a little bit later. 8 After that set of characteristics was 9 revised, it was then included in the draft NUREG/CR, which then in itself was subjected to a fairly 10 11 substantial review process. Both user offices, the Office of New 12 Reactors and the Office of Nuclear Reactor Regulation, 13 reviewed this, the draft report. They have people 14 15 from their PRA groups as well as their engineering groups looked at it. 16 17 It was also subjected to review by a selected panel of peer reviewers, which again included 18 19 industry folks, national lab folks, and international regulators. It was also subjected to a public review 20 comment period. And so we received a number of 21 additional comments from stakeholders. 22 As a result of all that review effort, we 23 had to tweak the set of criteria a little bit more, 24 25 not nearly as extensively as in the first go-around.

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And that final set of criteria or, actually, we call them now characteristics has provided input to the interim staff guidance for digital system modeling in new reactor PRAs, as this Committee was briefed on a few weeks ago. It also has been used as part of the

planning of an international activity, a nuclear energy agency meeting under WG-Risk, working group risk, that is going to look at a lot of these same topics that are covered in the NUREG/CR.

MEMBER APOSTOLAKIS: When is this meeting going to take place?

MR. KURITZKY: Again, that meeting was supposed to be held this past April. There were some problems with our international partners as far as scheduling. And we are now in the process of trying to reschedule that. And we are hoping to have it in the fall.

## MEMBER APOSTOLAKIS: Where?

20 MR. KURITZKY: Well, that was one of the 21 issues we mentioned last time. It was originally 22 scheduled for --

23 MEMBER APOSTOLAKIS: Probably Paris? 24 MR. KURITZKY: Well, it was originally 25 scheduled for Brookhaven. And a lot of the

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1	international partners didn't like that idea, so now
2	maybe Honolulu. No. I don't know.
3	MEMBER APOSTOLAKIS: Oh, it would be in
4	the United States?
5	MR. KURITZKY: Well, from our point of
6	view, it would be easier, but that we don't know yet.
7	That is just what we have to the international
8	partners didn't like the fact that we were kind of
9	specifying it was going to be in the United States.
10	So, in any case, we are still working on
11	that. And we don't know where it will be, but we do
12	hope it will be in the fall.
13	MEMBER APOSTOLAKIS: Okay. Before Alan
14	goes on, I want to emphasize something for the benefit
15	of the Committee. Everything he will talk about,
16	failure modes and this and that, refers to hardware
17	parts of the digital system.
18	Software failures they did not analyze.
19	All the stuff we've been talking about, design and
20	specification, requirements, faults and all that, they
21	did not do it. This is hardware. That's important.
22	MR. KURITZKY: And, just to further expand
23	on what Dr. Apostolakis said, the failures that are
24	quantified or the failures that are modeled in the
25	Markov and event and fault tree models that we have in
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225 1 this project only include hardware failure modes. 2 However, software is included. The normal behavior software is included in the sense that in 3 4 order to determine what were the failure paths that 5 would lead to system failure, we had to consider the software of the system. 6 And also consider few 7 we а 8 hardware-software interactions in the models. But, as 9 Dr. Apostolakis mentioned, we do not in these models quantify software reliability. 10 11 MEMBER APOSTOLAKIS: And the important thing is -- we are jumping a little bit ahead, but 12 this is an ACRS meeting. 13 (Laughter.) 14 15 MEMBER APOSTOLAKIS: Even though they focused on the hardware parts, the traditional methods 16 17 did not prove to be sufficient. These are very important. This is very good insight or conclusion 18 19 from their work. They still have to go to simulation, as 20 just said. In other words, you still have 21 Alan software left. We are not considering their failure 22 modes, but they are part of the system. So they have 23 to go and simulate it. 24 25 MEMBER STETKAR: To follow up on that, do **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701

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1	you consider, does the staff consider traditional
2	event tree/fault tree reliability methods adequate to
3	evaluate traditional analog reactor protection control
4	systems? That's a "Yes" or a "No" answer I would like
5	on that. I would like a "Yes" or a "No."
6	MR. KURITZKY: I can only give you my
7	opinion on that. My opinion is yes to a degree.
8	(Laughter.)
9	MEMBER STETKAR: Do you feel that
10	simulation is necessary for analog hardware systems?
11	MR. KURITZKY: I have only looked at one
12	PRA that actually broke down the details of the analog
13	protection systems. And no simulation was necessary
14	for that to develop those fault trees.
15	Now, whether a simulation would have made
16	a better fault tree or a more complete or accurate
17	fault tree, I can't tell you, but in that particular
18	case, simulation was not necessary.
19	MEMBER STETKAR: Okay. Thanks. I'm just
20	going to try to keep that in the back of my mind.
21	MEMBER BLEY: Keep it in mind, but the
22	thing Alan said about they looked at the proper
23	functioning of the software, it's the software
24	interacting with the hardware failure modes and the
25	timing that happen is where they use the simulation.
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1	MEMBER STETKAR: Okay.
2	MEMBER BLEY: So it's how things happen in
3	the software given a hardware failure curve. And the
4	random things of that is where they needed it. You
5	will tell us about that, right?
6	MR. KURITZKY: Yes. Also I have to take
7	some exception to what Dr. Apostolakis had a
8	(Laughter.)
9	MR. KURITZKY: I would say that the
10	traditional methods are not capable of modeling.
11	MEMBER APOSTOLAKIS: Sufficiently I said.
12	MR. KURITZKY: Well, right now we are not
13	in a position to make that claim. I think that the
14	traditional methods themselves are very powerful, as I
15	will talk about later, and can account for many
16	features of digital systems.
17	I think where we run into some problems is
18	with the supporting analyses for the modeling. In
19	other words, quantifying software reliability for
20	MEMBER APOSTOLAKIS: Even identifying the
21	
22	MR. KURITZKY: Yes.
23	MEMBER APOSTOLAKIS: So that's what I
24	meant.
25	MR. KURITZKY: Right, right. But that's
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1	not really a limitation of a traditional method.
2	Almost any reliability modeling method will need to
3	have those same types of supporting analyses, will
4	need to have the failure mode identification, will
5	need to have
6	MEMBER APOSTOLAKIS: But in the failure
7	mode identification arena, I cannot do it using only
8	event trees and fault trees.
9	MR. KURITZKY: Yes.
10	MEMBER APOSTOLAKIS: And that's a
11	conclusion from your standpoint.
12	MR. KURITZKY: Right, right. But we don't
13	see that
14	MEMBER APOSTOLAKIS: That's all I said, I
15	think. If I didn't, this is what I'm saying now.
16	MR. KURITZKY: Okay.
17	MEMBER APOSTOLAKIS: But this is a very
18	important conclusion. It is a very important
19	conclusion because the other "advanced methods" were
20	really on simulation. So what these guys are finding
21	is that you can't really have two separate approaches.
22	I mean, one has to borrow from the other.
23	MR. KURITZKY: Right, but the difference
24	being at the simulation or the scale
25	MEMBER APOSTOLAKIS: The degree you
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1	simulate.
2	MR. KURITZKY: In our case, the simulation
3	was more it wasn't an area that wasn't
4	well-understood. It was just almost an advanced
5	bookkeeping technique;
6	MEMBER APOSTOLAKIS: Right.
7	MR. KURITZKY: whereas, the simulation
8	for the advanced methods is, of course, more involved
9	and
10	MEMBER APOSTOLAKIS: Because they also buy
11	the good software.
12	MR. KURITZKY: And the interaction with
13	the
14	MEMBER APOSTOLAKIS: Yes. This is not
15	intended to be, you know, this method is better than
16	the other.
17	MR. KURITZKY: Right.
18	MEMBER APOSTOLAKIS: But I think it is
19	very important to appreciate that this separation,
20	which may be at the time that the staff decided to
21	have, made sense really ultimately does not make
22	sense. You really have to try to come up with
23	something integrated in my view without saying "My
24	scope does not include this" or "does not include
25	that."
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See, the difference is that, you know,
when Louis deals with something, sponsorship, he has
specific objectives that he has to meet. This
Committee is not bound by those.
MR. KURITZKY: Has no borders.
MEMBER APOSTOLAKIS: Yes.
MR. KURITZKY: Well, but the point that I
just
CHAIRMAN SHACK: It has no restraint.
(Laughter.)
MR. KURITZKY: I think the important
thing, though, I do want to make clear is that while
we recognize that the traditional methods, as we
defined and are using them, do have what I will refer
to as supporting analyses that need additional work,
we are not there right now.
MEMBER APOSTOLAKIS: Yes.
MR. KURITZKY: But the other more advanced
methods go beyond just the things that we are kind of
MEMBER APOSTOLAKIS: No question about it.
MR. KURITZKY: It's not clear whether we
necessarily need to or don't need to address some of
the aspects that the advanced methods address. We
don't know whether we will or not. We just don't know
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1	at this point.
2	MEMBER APOSTOLAKIS: In any case, this is
3	a fairly artificial separation. When you do research,
4	you do research. You are not saying, "Oh, they told
5	me not to touch this method."
6	I think this is getting off on a tangent
7	now. So why don't you continue?
8	MR. KURITZKY: Okay.
9	MEMBER APOSTOLAKIS: But I just wanted the
10	members to be fully aware of this factor. They are
11	using some simulation. And also on there it says the
12	relative failure of most of the components. Bear in
13	mind that errors in the software logic are not
14	included. They mean the hardware components.
15	MR. KURITZKY: Yes.
16	MEMBER APOSTOLAKIS: Very good.
17	MR. KURITZKY: Okay. So in applying these
18	methods for this study, the first thing that the study
19	team obviously had to do was get intimately familiar
20	with the digital feedwater control system going
21	through detailed design diagrams and documentation,
22	how the system works, understanding its function, its
23	digitally unique features and capabilities and
24	tendencies.
25	After undertaking that effort, that put
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232 1 the team in position to develop a failure modes and 2 effects analysis. In that case, they had to identify 3 exactly what types of component failure modes could 4 occur and how they would impact the system function. 5 Using that information, they could then go and develop the Markov and function models for the 6 7 Once those models are put together, obviously DFWCS. 8 with the intent of trying to quantify these models, we 9 need to have data. So we investigated what type of 10 data available in the public arena was to do quantification. 11

As I will discuss a little bit later, there wasn't a lot there. The Subcommittee is quite aware of that fact, let us know about it last time.

MEMBER APOSTOLAKIS: You were notsurprised, though.

MR. KURITZKY: No.

18MEMBERAPOSTOLAKIS:Imean,you19yourselves don't seem to think much of these data.

20 MR. KURITZKY: No. We are in full 21 agreement there, full agreement.

Again, the point is the last bullet on this slide goes back to what Dr. Apostolakis wanted to make clear, that these models do not address quantitative software reliability in terms of actually

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Also, human reliability analysis, which would be required if we wanted to integrate the digital system model into a full plan PRA, is not part of this work right now. But, again, in the ultimate goal, we will have to move forward in that area, too, because there was a lot of human interaction with the digital system.

Okay. What we did find out were a number of capabilities and limitations of these two models, at least initially, because, remember, this work is in the NUREG, which was before we actually did the first benchmark.

But our initial understanding of the capabilities and limitations of these methods is that both of them are very powerful methods. They are capable of addressing many features that I mentioned in digital systems.

Where the trouble really tends to come in is in the supporting analyses. And by "supporting analyses," I'm identifying things such as the failure mode identification, database development, dealing with the contribution of software failures. In my

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1	mind, those are supporting analyses, and that is where
2	the weakness occurs.
3	But that weakness doesn't occur just for
4	these traditional methods. Those weaknesses will tend
5	to be problems for most any reliability modeling
6	method: existing or advanced.
7	One advantage, of course, of event
8	tree/fault tree models is that they are integrated
9	into a plant PRA, which is one of the goals of the
10	work.
11	One specific advantage of the Markov
12	method over the event tree/fault tree method is that
13	it is capable of treating some time dependencies and,
14	more specifically, the ordering of failures. I will
15	talk a little bit about that in another slide.
16	MEMBER APOSTOLAKIS: Are you coming back
17	to the Markov?
18	MR. KURITZKY: Yes. Well, I am going to
19	come back to the ordering of the failures.
20	MEMBER APOSTOLAKIS: No. The ordering I
21	like. The Markov I think raises another point that
22	needs to be made clear. And the reason why the Markov
23	matrices can be solved in this case is because they
24	don't consider any repair or restoration of failure
25	components.
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1	In essence, what the Markov model becomes
2	is an event tree. You are just advancing in time.
3	MR. KURITZKY: Yes.
4	MEMBER APOSTOLAKIS: So they consulted.
5	So it is really a very limiting case of a Markov. If
6	you have a Markov model that results in a matrix,
7	transition matrix, that has, you know
8	MR. KURITZKY: Feedback.
9	MEMBER APOSTOLAKIS: below diagonal
10	members are all zero or they are above it depends
11	on how you put it then it is easy to solve. So by
12	assuming that there is no repair, which may be a
13	reasonable assumption in this case I don't know
14	although some of our consultants were troubled by it,
15	but then you consult. Okay?
16	So it's not just Markov models. It's a
17	very special case of Markov models.
18	MR. KURITZKY: Right. I think, to
19	underscore that goes back to the as Dr. Apostolakis
20	mentioned, the beginning of the two projects that the
21	staff is working on in this area, the more advanced
22	methods and the traditional methods. And if you
23	recall from the presentations on the advanced methods,
24	Markov models, more advanced version of the Markov
25	models, including cell-to-cell mapping techniques,
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236 were considered to be an advanced method. 1 2 What we have pulled into the traditional 3 methods is a more simplified Markov model, which, 4 again, does not have the repair. So, as Dr. 5 Apostolakis mentioned, we can solve it using 6 differential equations. And it doesn't have to be 7 numerically solved. And we don't subject ourselves to 8 state explosion or other problems that may --Right. 9 MEMBER APOSTOLAKIS: 10 MR. KURITZKY: in \_\_\_ occur more complicated models. 11 12 MR. CHU: I would like to explain a little The model, the system that we model, we 13 bit this. don't need to consider it here because it is our 1415 understanding, you know, it cannot be repaired That makes solving the model analytically 16 offline. 17 So it is relatively easy to devise an possible. 18 analytical solution. But when it comes to, say, 19 situations where repair is needed, it doesn't 20 necessarily mean that -- probably an analytical 21 solution cannot be devised. But as long as we look at single failure, 22 23 double failure, triple failures, if we look at it this way, say you had a triple failure and it's recognize 24 25 the first failure occurs and it's reparable, you can **NEAL R. GROSS** 

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237 1 put that into a model, too. So it's not necessarily 2 the problem will be unsolvable. 3 Of course, the current system doesn't 4 require that. 5 MR. KURITZKY: Okay. Let's see. Some of the limitations --6 7 MEMBER APOSTOLAKIS: One other thing. Ι 8 am trying to bring up the members who were not at the 9 Subcommittee meeting up to speed. criticism, if you will, of 10 One the 11 Subcommittee members present -- by the way, it was 12 Dennis Bley, Jack Sieber, and -- were you there? Ι don't know. 13 MEMBER STETKAR: I was not. 14 15 MEMBER APOSTOLAKIS: Mario Bonaca. For those who were not there, one criticism of 16 the 17 Subcommittee members was that the assumptions that we mentioned so far, namely no software failures, is 18 19 simplification of the Markov. They were not made 20 clear enough up front in the report. You really have to read 96 pages before you realize the software 21 failures are not modeled. And the Subcommittee 22 members felt that it should not be so. 23 That is not a major plan to fix that, but, 24 25 I mean, that is what we saw at the time and also the **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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238 1 Markov thing. I mean, it really dawned on us after 2 quite a while when I think Louis was talking that the 3 Markov matrix was really very simple because of these 4 assumptions. The comment was bring all this stuff up 5 front so the reader knows. In fact, do you think the title of your 6 7 report is accurate? 8 MR. KURITZKY: I think so. Is that a 9 "Yes" or "No" question? MEMBER APOSTOLAKIS: I don't think. Well, 10 you answered "Yes" or "No," and I didn't even put that 11 12 constraint. It says, "Approaches for Using Traditional 13 Probabilistic Risk Assessment Methods." But you do do 14 some simulation. 15 MR. KURITZKY: Right. And that's where, 16 again, I go to the degrees of simulation. In my mind, 17 having -- and we're jumping a little bit because we 18 19 are going to get to the idea of the simulation in a slide or two. 20 But using that simulation to get over the 21 hump of what I would call bookkeeping is not the same 22 as the --23 MEMBER APOSTOLAKIS: It's not the same, 24 25 but it's still simulation. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1	MR. KURITZKY: But I wouldn't say that
2	that is necessarily not a traditional method. That's
3	where I the definition of traditional methods for
4	us really hinges on whether or not you account for the
5	plant physical processes and interactions with the
6	system.
7	MEMBER APOSTOLAKIS: Do you do that?
8	MR. KURITZKY: We do not.
9	MEMBER APOSTOLAKIS: That's another thing
10	I forgot to mention.
11	(Laughter.)
12	MEMBER APOSTOLAKIS: So there are three
13	fairly significant assumptions. I mean, we all make
14	assumptions when we do work, but there are three
15	significant assumptions that should be really way up
16	front there so that the reader knows what follows.
17	The interaction with the process variables is not.
18	Okay.
19	MEMBER BROWN: Can I ask a question?
20	MEMBER APOSTOLAKIS: Sure.
21	MEMBER BROWN: You made the assumption
22	that you have a failure and then you just keep on
23	operating and then you have another failure and then
24	you keep on operating and then you have another
25	failure and then what plant operates like that. Have
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1	I missed something?
2	MEMBER STETKAR: Yes.
3	MEMBER BROWN: Okay. Then tell me.
4	MEMBER STETKAR: This is a three-element
5	feedwater controller. And they assumed any failure
6	gave you a loss of feedwater.
7	MEMBER BROWN: Well, then you've got to
8	fix it.
9	MEMBER STETKAR: Well, no. But their
10	failure was loss of feedwater. So it is a really
11	simplified model of a simplified control system such
12	that any failure gave you the undesired result.
13	Therefore, they didn't need to look at repairs.
14	MEMBER APOSTOLAKIS: Basically, what they
15	are doing is this. They go through what Alan said
16	when they identify failure modes of individual
17	elements, hardware. And they say, now, if this
18	failure occurs, what is the impact on the system? And
19	that's where they need to do this simulation on the
20	side.
21	And they have a number of such single
22	failures. And they conclude yes, this is a failure of
23	the system, this is not a failure. When they take
24	them three at a time, when they go to three at a time,
25	they reach more than a million rounds.
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MR. KURITZKY: You are stealing my thunder again. You are stealing my thunder again.

MEMBER APOSTOLAKIS: Well. So that's really all they do. They don't ask, but, you know, if I have two failures, you know, maybe there's something that will happen and they will stop the system from operating, right? You just go underway to see the impact.

9 MR. KURITZKY: Right. But it does consider the fact 10 that -- and that's where the 11 ordering the failures comes in to be important, that 12 you could have a failure that, in and of itself, if it occurs first, will result in the undesired outcome, 13 the system failure, as we define it. 14

And then you could also have cases where some other failure occurs first which doesn't fail the system. And then the failure occurs that previously would have failed the system had it occurred first, but occurring second, it does not fail the system. So it does account for that.

21 So it's not like it's just accumulative. 22 The ordering of the failures is accounted for because 23 it does make a difference for these types of systems.

24 MEMBER APOSTOLAKIS: But I think the 25 important thing is that they assume that if a failure

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242 1 of an individual part occurs, the plant does not know 2 about it. 3 MR. KURITZKY: Right. There are 4 fault-tolerant features in the system, which we do 5 model, you know, self-correcting features. But we do not account for any operator or human intervention to 6 7 correct something that was failed. 8 It is our understanding that MR. CHU: 9 when a failure occurs, it is not possible physically 10 to go in and change a part without interruption to feedwater control. Therefore, for practical purposes, 11 we cannot repair it. 12 But if the failure itself MEMBER BROWN: 13 feedwater, then it doesn't 14 stops the make any 15 difference. You have to --MR. CHU: Not every failure, not every 16 individual failure, mode causes a failure. That's why 17 we went all the way to consider triple failures. See, 18 19 for a triple failure to fail the system, after the the second failure, the system is still first or 20 working. 21 22 But the plan may recognize, there may be some indications that show something as strong. 23 But 24 in order to repair it, you have to shut down the 25 That defeats the purpose. Therefore, it's a system. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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reasonable assumption that failures are not reparable.

MR. KURITZKY: Now, to get over, your point would be when we do the second benchmark system and look at a protection system, where there are multiple redundant channels, there is a case where things could fail and those failures may be identified and repair may take place.

8 So that's going to become more of an issue 9 when we look at a protection system versus in this 10 case, which is a control system, where as soon as you 11 have the failure, you have the undesired outcome. So 12 repair is after the fact, essentially.

MEMBER APOSTOLAKIS: Wouldn't it have beeneasier to do the reactor protection system first?

MR. KURITZKY: We would have loved to do the reactor protection system first. That was, in fact, what the plan of the whole project was. And we couldn't get the system in-house.

My understanding was that the feedwater control system, we were able to get -- this was tied into the work that was done at University of Virginia for Fulton-Jackson, which supported the Ohio State work and also our work. And while the intention was to do the RPS first, we just couldn't get the system available.

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And it is unfortunate because had we done the reactor protection system first, I think it would have been a little more -- we have learned more appropriate things for our concerns. That way it may not have been as important to do a second system necessarily had we looked at the protection system, but that's just not the way it worked out.

MEMBER APOSTOLAKIS: Okay.

9 MR. KURITZKY: Okay. Again, this is one 10 of the items that Dr. Apostolakis already mentioned. By definition, traditional 11 the methods do not explicitly account for the interactions between the 12 plant process parameters and the system being modeled 13 or the timing of these interactions. And that is the 14big definition to differentiate between what we call 15 traditional methods and what we call dynamic methods 16 or advanced methods. 17

Additional limitations of the methods themselves, the event tree/fault tree method, cannot account for the order of the failures. And, as we just discussed a moment ago, that is something that is important for these types of systems.

23 One potential limitation of the Markov 24 method, even the simplified Markov method, as Dr. 25 Apostolakis pointed out, we have a much more

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simplified version than what would be done in the dynamic approach, but even in our simplified method, we are subject to state explosion, where we could have so many system states that developing and solving the model, the Markov model, is not practical.

And, as you will see when we talk in a few 7 minutes about the simulation, we do end up with quite 8 larqe model, with simplifying а even our the 9 assumptions. But we do manage to steer clear of state explosion or at least be able to address it. 10

11 The NUREG/CR also identifies, as Ι 12 mentioned before, some candidate areas for further One of the important things that has come 13 research. out of this work and has been discussed in front of 14 15 the Committee and elsewhere with other digital activities in the agency is the need to identify the 16 17 failure modes of the digital system components. Failure mode identification is 18 а very important 19 underpinning to all of this.

And while we have developed an FMEA for 20 this project, for the proof-of-concept project, that 21 we undertook, we recognize that the completeness of 22 that set of failure modes is obviously there is a fair 23 amount of uncertainty associated with that. 24

And so further work into getting a more

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246 1 complete picture of the different types of failure 2 modes that can occur for digital system components is 3 clearly an area that we would benefit from. 4 Also, determining the effects of component 5 failures on the system, both single failures and combinations of failures, as was already discussed a 6 little bit, that is where we had to bring in the 7 simulation model. And, again, I will talk about that 8 9 in the next slide. But it is very difficult to do 10 that manually, so to speak. And the systems are too 11 complicated such that automatic tools are typically 12 necessary to support that effort. Is this control system 13 MEMBER STETKAR: complicated than 14 any more а normal analoq three-element feedwater control or --15 MR. KURITZKY: I couldn't tell you. 16 MEMBER SIEBER: A little bit. 17 MEMBER APOSTOLAKIS: Is more complicated 18 19 you're saying? MEMBER SIEBER: More interaction between 20 21 22 MEMBER STETKAR: Comparison. MEMBER SIEBER: Simple systems. 23 MR. KURITZKY: Simple until you try to do 24 25 the model for it. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1	MEMBER SIEBER: Right.
2	MR. KURITZKY: Also, as you mentioned,
3	there is a need to get better data, find better data,
4	classify better data, assemble better data,
5	particularly in the public arena.
6	Vendors and manufacturers have their own
7	proprietary databases. And those may, in fact, be
8	more complete. They may be of better quality. We
9	don't know. We are not privy to them. But certainly
10	in the public arena, there is a tremendous scarcity of
11	data.
12	MEMBER BROWN: What kind of data are you
13	looking for?
14	MR. KURITZKY: We are looking for failure
15	rates.
16	MEMBER BROWN: Failure rates, like how
17	many resistors I've had fail or how many integrated
18	circuits I've had fail out of the number produced or
19	how many
20	MR. KURITZKY: How many have failed per
21	either cycle operation of the component or per hour,
22	per time. So we are looking for failure rates or
23	failure probabilities as well as a breakdown of
24	failure mode distributions for a particular multiflex
25	or whatever component we're looking at that can fail
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in different ways.

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And we need to know, even if we have a failure rate for the component as a whole, what fraction of that failure rate was this type of failure mode versus another type of failure mode. And so it's really failure rates and probabilities and a breakdown of failure mode distributions.

8 And it is an important thing to identify because a lot of data collection efforts that exist, 9 both in the nuclear field and elsewhere, focus on just 10 looking at the actual operational experience and 11 12 looking at the data and studying it. And that gives a wealth of information. It goes directly towards the 13 first bullet of helping to identify failure modes. 14 But it doesn't give us the pieces we need to stick 15 into a probabilistic model and come up with a number. 16

17 Another aqain item is clearly the quantitative software reliability model or at least 18 19 some means of addressing the contribution for software failures in the model. That is something that clearly 20 we don't have in this. Currently the state-of-the-art 21 doesn't support it right now. And that is something 22 obviously is a prime candidate for 23 that further research. 24

Treatment of uncertainties, again, in this

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case particularly modeling uncertainty and completeness uncertainty are two thorns in the side that we really need to address.

And, lastly, human reliability analysis, again, taking it step one further in implementing or integrating the digital system model into a plant PRA, we need to address the human reliability analysis aspects of interacting with the system as well as the human-system interfaces that occur in digital control rooms.

11 Okay. That pretty much wraps up what is 12 in NUREG/CR-6962 in a nutshell. Like I said, there was a lot more detail we went into at the previous 13 Subcommittee meeting. We don't have the time to go 14 15 into all of it now. We can address any questions on any of those topics that you would like. 16 But that essentially is what is in the existing NUREG/CR. 17

have moved forward the first 18 We on 19 benchmark study. And we have identified already a number of insights or obtained a number of insights 20 that are making us rethink a little bit about what was 21 in the initial NUREG. 22

One of the biggest things that we have come across -- and it has been mentioned already a number of times this afternoon -- is that a level of

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250 detail for these system models that we feel you need 1 2 to go to to be able to identify all the aspects of a digital system that could impact its reliability, you 3 end up with such large and complex models that it is 4 5 virtually impossible to use the traditional fault tree or the Markov model method to identify all the failure 6 7 paths or failure combinations that lead to system 8 failure. And it is because of that reason, 9 particularly with the digital feedwater control system, where not only was it combinations of failures 10 were impossible to track to determine if the system 11 12 failed but even some individual failures, which is very difficult to determine whether or not the system 13 function would be compromised. 14 15 And because of that, Brookhaven put together a simulation tool that takes as input 16 \_\_\_ 17 well, first of all, it's based actually on the source code of the system itself. 18 19 So it's built on the software, and it takes as input the various failure modes that were 20

21 identified in the FMEA. And it uses some 22 analyst-specified rules for determining what qualifies 23 or constitutes a system failure.

And then it goes and it looks through. As Dr. Apostolakis mentioned, it will go through each

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individual failure. And it will crank it through and determine whether or not the system has failed. If it does, it is retained as a single failure of the system.

All those that do not cause system failure are thrown back in the pool to be looked in pairs. And then, again, those pairs that cause system failure are retained. Those that do not go and look at the triple combinations.

In addition, because the order of the 10 failures, as we mentioned, is important, it tracks the 11 12 orders, too. So whereas ABC may not be a failure, you know, BAC may be a failure. So it keeps track of that 13 and ultimately gives the combinations of component 14 15 failure modes that lead to system failure, essentially the cut-sets you would get 16 the from same as quantifying or from solving a fault tree except that 17 you have the order of the failures included. 18

19 when went and used the Again, we simulation tool for the digital feedwater control 20 system, we came up, as Dr. Apostolakis mentioned, a 21 few hundred single failures, many thousands of double 22 failures, and millions of triple failures. 23 We stopped after coming up with the triple failures. 24

Using the questionable data that we had

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1 available but in quantifying it, we saw that, as 2 expected, as you got to the higher order failure combinations, the contribution to the system failure 3 4 probability was decreasing rapidly. So we felt no 5 need to go beyond the triple combinations. I shudder to think how many quadruples we 6 7 would have come up with. 8 MEMBER STETKAR: Alan? 9 MR. KURITZKY: Yes? 10 MEMBER STETKAR: Let me stop you right there for a second. These numbers of very large 11 12 combinations of failures are impressive. How much are they affected by the level of detail that you felt was 13 necessary to model a component? 14 15 For example, one can model a relay by looking at probably 30 different subcomponents of a 16 relay. And that will lead me to many thousands of 17 combinations of three relays failing. On the other 18 19 hand, most people model a relay as a relay. 20 MR. KURITZKY: Right. MEMBER STETKAR: So the degree of detail 21 that you felt is necessary to model these systems 22 perhaps affects your perceived complexity. 23 Is that correct? 24 25 KURITZKY: Right, exactly. If you MR. **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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look at the top line right there, the reason we are running this problem is because at the level of detail that we felt was necessary to take the model to, we ran into this problem.

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5 MEMBER STETKAR: I'll come back to my 6 original question, then. Twenty-five years ago, when 7 we first started to model reactor protection and 8 control systems for analog types of signals, we could 9 have given this same presentation, that they're so 10 complicated that it's not possible to model them. And, yet, we have been doing that, using these same 11 12 methods, for the last 25 years, apparently to the acceptability of all of those concerned. 13

Why do we need to examine these methods to model the digital hardware? Because we have used them to model extremely complex analog hardware that has exactly these same problems.

18 MR. KURITZKY: Okay. I have some answers19 for you here.

MEMBER STETKAR: Okay.

21 MR. KURITZKY: And, again, I think the 22 example that we used at the Subcommittee meeting was 23 diesel generators, in fact; whereas, we essentially 24 can have diesel generators fail to start, fail to run. 25 I personally have been involved in doing a

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1	fault tree of a diesel generator that broke it down to
2	the components of the air start system, the little
3	boil system, all of it. We don't include that in a
4	PRA model.
5	MEMBER STETKAR: And the reason you don't
6	is if you try to, you will come to the conclusion that
7	the diesel will never work.
8	MR. KURITZKY: Well, there is the problem
9	that summation of the parts exceeds the whole.
10	MEMBER STETKAR: That's right.
11	MR. KURITZKY: But that
12	MEMBER STETKAR: No. It's true. I
13	participated in a reactor protection analysis 25 years
14	ago that took 9 months to develop a fault tree, had
15	the same problems, was too detailed, could not find
16	data.
17	And the conclusion once they finally
18	solved it was that the reactor would fail to trip once
19	in every five demands, something obviously wrong
20	because the plant had operated many, many years with
21	many, many successful reactor trips.
22	So the perceived level of detail necessary
23	is very important. The level of detail compatible
24	with available data is very important.
25	MR. KURITZKY: Right. And the point that
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I will make is that in the diesel generator example, the reason that we don't model to that level. It's not because that the calculator probability would then exceed reality.

It's the fact that the key to what level of detail you need to go to, there are two major factors. One is get the level we have data. And we have data for diesel at the higher level.

9 The second is we have to identify the 10 dependencies between that component or system and 11 other components and systems in the plant. And we 12 don't necessarily need to go to that level of modeling 13 to do that either.

For this particular case, the reason we 14 felt that we needed to go to this level of detail --15 and, for the record, we're not saying that that is 16 necessarily the level of detail that models in the 17 future have to go to. It's what level we took it for 18 19 in this proof-of-concept study because we suspected that it may be necessary. Time will bear out whether 20 that makes a difference or not. 21

But the reason that we went to that level is twofold: one, because what little data was available in the public arena was at this. It's called basic, generic component level. And so we went

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1	to go down to that level to get data.
2	The second reason is that going to that
3	lower level, we are able to identify certain potential
4	failure modes of the system that would not necessarily
5	be picked up at a higher level.
6	MEMBER STETKAR: Now, that's important.
7	That is important.
8	MR. KURITZKY: Right. And we did identify
9	a couple of cases there of things that are unlikely
10	that even the designers may not be aware of that would
11	result in system failure.
12	Now, whether those failures are at all
13	probabilistically significant is another matter. So
14	we wanted to go to that level of detail because we
15	felt that was necessary.
16	Now, time will tell whether you do need to
17	go to that level of detail, but at this point we did.
18	And that is the reason we have all of these failures.
19	If we didn't go to that level of detail, you are
20	right. We wouldn't need the simulation model. You
21	probably could do things at a much easier way.
22	MEMBER BLEY: I think you just hit on
23	something that is important. And I'm not sure the
24	report said this itself, that this report wasn't
25	written to be a model for how to do this kind of
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257 analysis but as a proof-of-concept study to see what 1 2 you could get at. I don't think that's at all clear from the 3 4 text in the report. 5 MR. KURITZKY: Okay. We will go look at 6 that, make clear that it is or beef it up. 7 MEMBER SIEBER: It certainly is an 8 opportunity for confusion. 9 MEMBER APOSTOLAKIS: all right. MR. KURITZKY: all right. Okay. Where did 10 I leave off? Okay. So the simulation tool itself 11 12 helped solve a problem for us because obviously we had way more combinations that we could deal with and we 13 were not able to identify which ones cause system 14 15 failure. And it got us over the hump. However, it still took quite a bit of time 16 to run the simulation due to the sheer number of 17 failure combinations that we had to encounter. 18 19 MEMBER APOSTOLAKIS: So let me understand this. When you say, "simulation," you had simulated 20 the whole system, right? 21 MR. KURITZKY: Yes. 22 23 MEMBER APOSTOLAKIS: Now, when you postulate that one or two --24 25 MR. KURITZKY: Component failures. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

258 MEMBER APOSTOLAKIS: -- failures, do you 1 2 go back and look at the simulation to make sure that 3 it's running, I mean, it's still running? 4 MR. KURITZKY: The simulation actually has 5 it automated. Louis, you can jump in, but we feed, actually, the whole set of individual failure 6 7 components, you know, the basic failures. And it goes 8 and takes upon them actually one by one. Then it 9 takes them in pairs. Then it takes them in --10 MEMBER APOSTOLAKIS: But would the software be affected by these individual failures? 11 Do 12 you see what I'm saying? Maybe something that was a subgrouping or something would not work because you 13 would have lost a couple of components, hardware 14 15 components. MR. KURITZKY: Right; in other words, the 16 software in the actual digital feedwater control 17 system. 18 19 MEMBER APOSTOLAKIS: Yes, yes. 20 MR. KURITZKY: We don't have that type of failure in there, right? 21 We are basically running the 22 MR. CHU: actual fault tree. So when we postulate a failure 23 mode, it's a fact it's reflected in the signal of the 24 25 variables processed by the software. And that has --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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you know, if you feed certain input to it and the software processes it and gives you a surprising result, then you question how long could it be the design of the hardware or it could be the design of the software itself. MEMBER APOSTOLAKIS: You just said the variables. So the actual software of the system works with the physical variables of being modeled, correct? MR. KURITZKY: Yes. MEMBER APOSTOLAKIS: You are assuming in your simulation that these are nominal? MR. KURITZKY: Some fixed variables, yes. MEMBER BLEY: I am not sure it's clear from what you said here, that you talked about in the Subcommittee meeting. When they do this simulation, they are actually running the software that runs in these machines in a test machine against each other. they're introducing these failures, So letting the software run, letting it interact with the next processor's software, and seeing how that timing works out, right? MR. CHU: Yes, as compared to, say, the The dynamic method developed a model dynamic method. of the software while we actually run the software.

MEMBER APOSTOLAKIS: Right.

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1	MR. CHU: Of course, our running of the
2	software still is in approximation to the real system.
3	MR. KURITZKY: Okay. I have a couple of
4	slides now that I want to just address. This is based
5	on the now it gets interesting.
6	MEMBER APOSTOLAKIS: Yes.
7	MR. KURITZKY: This is the feedback we
8	received from the Subcommittee a few weeks ago. I
9	broke it down into two separate camps. Comments or
10	recommendations that involve programmatic issues in my
11	definition are things that actually exceed the scope
12	of this project, the stuff that is covered in the
13	NUREG/CR. And then the other camp is actual comments
14	and recommendations that apply to the information
15	provided in the NUREG/CR.
16	I am not going to go over individually
17	every one of the items that are this list, but the
18	gist of these items was and I think Dr. Apostolakis
19	I think has already mentioned to some degree the issue
20	is that, as opposed to looking at the system,
21	looking at the hardware part of the system, and then
22	recognizing that the software part needs further work
23	and dealing with that separately, that the staff
24	should go and look at an integrated model, a
25	probabilistic model, look at the software and hardware

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261 1 together, to see how it can be modeled and, as a first 2 step in doing that, actually to look and see whether 3 or not from a philosophical point of view the 4 fundamental concept of probabilistically modeling 5 software or using, considering software failure in a PRA context, is, in fact, appropriate and practical. 6 7 And I think that was the essence of what we took away 8 from a programmatic --9 MEMBER APOSTOLAKIS: Yes, because 10 depending on what conclusions you reach there, you may want to investigate a few things and not bother with 11 12 others. MR. KURITZKY: Exactly. 13 MEMBER APOSTOLAKIS: It's not just that 14 15 you want to do some philosophy. MR. KURITZKY: Right. 16 MEMBER APOSTOLAKIS: In fact, Louis 17 I think last Subcommittee meeting did mention why a 18 19 failure rate makes sense. If you have context, things happen. 20 MR. KURITZKY: Right. 21 MEMBER APOSTOLAKIS: I mean, if we agree 22 with all this stuff, then I think that would be fine. 23 But we do need that because it's not like we are 24 25 modeling a new piece of hardware. Well, we more or **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

262 less know there would be a failure rate or read the 1 2 failure for demand. So that's really the reason to 3 guide the further investigations. 4 Where did you get these, by the way, from 5 the transcript? MR. KURITZKY: Well, actually, based on 6 7 the notes that we took. 8 MEMBER APOSTOLAKIS: Oh, you took notes? 9 MR. KURITZKY: Right. 10 (Laughter.) 11 MR. KURITZKY: And we did get the 12 transcript later to look through it, but that didn't really change any of the -- in any way, so that's the 13 general gist, as Dr. Apostolakis mentioned, is looking 14 15 to see whether it makes sense to go ahead and model the software and the hardware together. 16 MEMBER APOSTOLAKIS: I don't understand. 17 When you say there, "The staff should explore," I 18 19 thought they reviewed that thing. I mean, you guys wrote it. Appendix C? 20 MR. KURITZKY: Well, that comes in the 21 third bullet. The first bullet in my mind was 22 actually broader. Appendix C is a first step to that. 23 In the next slice, they give you the answers -- well, 24 25 not really the answers but will give you some --**NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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1       MEMBER APOSTOLAKIS: I am really curiou         2       I don't remember if you answered. Why did you remo         3       it from the report? You felt         4       MR. KURITZKY: Okay. Then we're going         5       go to the next slide. Okay. Staff response         6       MEMBER APOSTOLAKIS: Yes.         7       MR. KURITZKY: to the         8       recommendations. Okay. The staff is undertaking         9       will soon undertake the following activities. The         10       first thing is reviewing the draft former appendix         11       that was in the report that we took out.         12       The reason that that appendix was take	ve to se
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12 The reason that that appendix was tak	
	en
13 out of the report was primarily twofold. One	is
14 because it dealt with advancing the analysis a	nd
15 evaluation of software failure reliability, which w	as
16 not part of the scope of the current project. Ar	d,
17 remember, I am speaking to you as a project manage	r,
18 not as an unbounded ACRS member. Okay? So that w	as
19	
20 MEMBER APOSTOLAKIS: So when you say, "T	he
21 staff is undertaking reviewing," you mean you?	
22 MR. KURITZKY: No.	
23 MEMBER APOSTOLAKIS: Not Louis?	
24 MR. KURITZKY: That's right, right, staf	f,
25 but particularly I mean to say not me, not under th	: ~
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264 project, under a separate activity but in the --1 2 MEMBER APOSTOLAKIS: But it would be NRC staff, not a contractor? 3 4 MR. KURITZKY: That's right. NRC staff. 5 Now, we may involve contractors in that, but --MEMBER APOSTOLAKIS: Not this guy, no, 6 because he wrote it. 7 MR. KURITZKY: Well, I didn't just which 8 9 I said we may -contacts. 10 (Laughter.) 11 MEMBER APOSTOLAKIS: Ι mean, we are supposed to review our own work. You should not be --12 MR. KURITZKY: They will not be 13 No. involved in reviewing their own work. However, they 14 15 may be involved in explaining it, but they are not going to be involved in reviewing it. 16 MEMBER APOSTOLAKIS: That's fine. 17 In any case, so it was out of scope. So the software is out 18 19 of scope. The second thing is this was work that was done actually a few years ago under a separate part of 20 the contract. 21 22 And it was before the program was redirected. And so it fell off the edge of the table. 23 And so now, again, we are looking at it. The staff 24 25 is re-looking at it under a separate activity to see **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	whether there is stuff there that is of value.
2	There are some interesting concepts that
3	may be worth further pursuing. And it's what we are
4	looking at right now but just not as part of this
5	direct project.
6	Okay. Secondly, the staff is also looking
7	at data. Well, I guess the Committee is aware right
8	now, obviously, that the staff and industry are
9	looking at nuclear digital system component failure
10	data right now to derive insights as to failure modes.
11	But what we are also doing is looking at
12	some non-nuclear. There's a lot of digital experience
13	in non-nuclear industries. And so we have an effort
14	underway to look at some of that data also.
15	MEMBER APOSTOLAKIS: I have a question
16	about that. I don't remember if it was in this report
17	or another report where it is stated repeatedly that
18	each software system is unique and that you cannot
19	take experience from this system and use it for
20	another. Is that in your report?
21	MR. KURITZKY: I don't know the specific
22	words, but it generally exists in our report and
23	everywhere else.
24	MEMBER APOSTOLAKIS: So why did you
25	experience with other systems, especially in
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266 1 non-nuclear industries, where, you know, the quality 2 assurance may be not as rigorous and so on and so on? Why did you do it? 3 4 MR. KURITZKY: Because, again, we go to 5 the difference between identifying failure modes and 6 understanding failure modes versus quantifying. MEMBER APOSTOLAKIS: To see what happened. 7 8 MR. KURITZKY: That's right. We're not 9 looking at that data in order to plug it in to our 10 model as in numbers but, rather, to see what you can 11 learn about how the digital systems and their components fail. 12 MEMBER APOSTOLAKIS: You heard EPRI's 13 presentation to the Subcommittee. 14 15 MR. KURITZKY: Right. MEMBER APOSTOLAKIS: You were aware of it 16 before? 17 MR. KURITZKY: Yes. 18 MEMBER APOSTOLAKIS: Is that changing 19 anything from what you are doing? I mean, they seem 20 to be collecting a lot of information. 21 Well, it is not really 22 MR. KURITZKY: impacting what I am doing in this project. 23 Again, there were other NRC projects. In fact, the Committee 24 25 was briefed on an in-house or staff effort looking at **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. WASHINGTON, D.C. 20005-3701

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nuclear and digital system failure experience.

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And I think there was even some talk. And whether the industry or the staff mentioned in the last briefing that there has been some cross-checking or, you know, one said that they had looked at the others and got some information that they couldn't find, et cetera. So both of those efforts are going along I guess independently, but there is crossover there. It's not part of this project, but that is something that is going forward.

And so both of those efforts -- I mean, we can't lose from any of them. The more data we look at, the more things we see and understand that better our knowledge. But it's just not part of this project. But, again, it is an activity that the staff is undertaking to increase our understanding of failure modes of digital system components.

We also are planning to conduct internal discussions on the fundamental aspects of software failure modeling. And that is to get at the issue as to whether or not it makes sense, whether it is appropriate or makes sense to be able to model software failures in a probabilistic sense.

24 MEMBER APOSTOLAKIS: What brought this 25 about, the conduct of internal discussions?

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268 MR. KURITZKY: What is the title of that 1 2 slide? 3 MEMBER APOSTOLAKIS: Yes. But, I mean, we 4 asked you to do this two years ago. 5 MR. KURITZKY: But you just asked me this year. 6 (Laughter.) 7 8 MEMBER APOSTOLAKIS: Good answer. 9 (Laughter.) MR. KURITZKY: I think the staff has been 10 11 working on these ideas. It's just we're more 12 formalizing them now as we're getting more input and moving further along. 13 MEMBER APOSTOLAKIS: Well, it's also the 14 15 time scale of response. MR. KURITZKY: I can't answer that. 16 17 MEMBER APOSTOLAKIS: But I know from experience. 18 19 MR. KURITZKY: Okay. MEMBER APOSTOLAKIS: It's not on the order 20 21 of months. 22 MR. KURITZKY: In any case, the results of 23 various efforts well these as as the other recommendations, the programmatic recommendations, 24 25 will be all folded together. And that will be **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

269 1 reflected as we update the five-year digital I&C 2 research plan, which the Committee will be briefed on later in the year. 3 4 MEMBER APOSTOLAKIS: And this is happening 5 in the fall sometime? MR. KURITZKY: I don't know what the exact 6 7 schedule is, but --8 APOSTOLAKIS: This is MEMBER very 9 important, by the way. I think the Committee will 10 have a major role there. Now we are all wiser after 11 all of these preliminary steps. 12 MR. KURITZKY: Right. And last item I just want to mention, a specific recommendation that 13 was made by the ACRS was that one task in the current 14 15 project or the last task of the current project, in fact, was to integrate the models that we come up with 16 17 into an actual plant PRA to make sure that it would flow smoothly. 18 19 the recommendation, which we And have taken to heart, is that we should hold off on trying 20 to implement that until after we have more complete 21 and integrated models; in other words, that have 22 software failures if it's going to be possible in the 23 model itself. And it would be premature to try and 24 25 essentially put the hardware model into the PRA. So **NEAL R. GROSS** 

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we are holding off on that task.

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This slide brings up a few of the specific recommendations that we heard in April from the Subcommittee on the information in the report itself. The first item was the fact that the staff should continue to focus on failure mode identification and the effects of those failure modes. And, in fact, that is still a major portion or a major part of the report.

And the staff should also explore the theoretical basis for evaluating individual systems in the traditional probabilistic model, the emphasis there really on the software aspects.

Secondly, because some of the criteria at 14 that time, what were called evaluation criteria in 15 section 2, address issues for which there are not 16 17 currently methods available or there is no consensus on for accomplishing, it was felt that -- and some 18 19 other ones were relatively vague and not very specific as to what a practitioner would have to do. The staff 20 should go revisit those criteria. 21

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 MEMBER APOSTOLAKIS: How many did you

 23
 have?

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 MR. KURITZKY: Fifty-two.

 25
 MEMBER APOSTOLAKIS: How many are you

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271 going to end up with? 1 2 MR. KURITZKY: Fifty-four. MEMBER APOSTOLAKIS: You start with 54 and 3 4 you end up with 54? 5 MR. KURITZKY: We didn't add any. (Laughter.) 6 The next slide I'll show MR. KURITZKY: 7 you will respond to that comment. 8 9 Another item that we have that we Okay. have to deal with is the fact that we have very 10 poor-quality data in the public arena and the issue 11 12 that is not meaningful to quantify when you have such poor data. 13 The recommendation we got from the ACRS 14 15 was either to heavily caveat that. MEMBER APOSTOLAKIS: The ACRS 16 Subcommittee. 17 18 MR. KURITZKY: Subcommittee. Sorry. 19 -- Subcommittee was to heavily caveat the tables that have that data so that they could not be 20 separated out and used for nefarious purposes. 21 MEMBER CORRADINI: He said, "Nefarious"? 22 MEMBER BLEY: That's an appropriate word. 23 It's very appropriate for this circumstance. 24 25 MR. KURITZKY: And also again, -- and Dr. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

272 1 Apostolakis already mentioned this -- the fact that 2 the report does not address software failures should 3 be made more prominent right up front. That was 4 MEMBER APOSTOLAKIS: Right. 5 already discussed. MR. KURITZKY: Right. Right. Okay. So 6 7 this is what we are planning to do in the report to 8 address these recommendations. The work on failure 9 modes still does comprise a significant portion of the 10 report. And that clearly is an important aspect. And 11 we agree with that comment. The issue about coming with 12 up а theoretical basis for evaluating software failures, 13 that's something that we felt, again, was out of the 14 15 scope of the current project. So we weren't going to address it substantially in this NUREG/CR. 16 In chapter 6 under the Markov models, we 17 talk a little bit about including software failures 18 19 into a model. But the bulk of what that really addresses, this topic was in the appendix C, which, as 20 we mentioned before, is not going to be included in 21 the final NUREG/CR but is being looked at further by 22 the staff as a separate activity. 23 The criteria in section 2, we went and 24 25 looked at them. We made some minor changes to the **NEAL R. GROSS** 

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wording of some of the criteria. However, the big change I think that really gets at addressing the Subcommittee's concern is just the name. We call them "evaluation criteria." And

that implied a certain amount of regulatory impetus and implied that people who were to come in with models would have to meet these criteria. There would have to be some level of acceptance, some acceptance criteria they would have to meet in order to be so-called adequate or sufficient.

That really was not the intention of that list. And so what we have done is we have actually renamed them as desirable characteristics of a digital system model because, really, what they are is a list of the things that we feel an ideal model should contain.

Whether or not all or some or none of 17 those things would ultimately be required of a model 18 19 from a regulatory perspective that remains to be 20 determined. As of right now, all they are is essentially a wish list of what we think should be in 21 a model. 22

And we want that list because when we go do our benchmark studies and we are going to compare them against that list, we want to see how well we can

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match up with current state-of-the-art in meeting 2 these various characteristics that we think are And that is going to help us identify desirable. 3 4 where we feel there may be additional areas that may 5 need additional research and development. Okay?

they're not intended to have But 6 any 7 regulatory implication at this point. And so I think 8 that terminology change actually is very important because it gives a whole different meaning to what that list involves. 10

Also, the report, we are still after much 11 12 debate deciding to take all the numbers out of the report or heavily caveat them. We have decided to 13 leave the numbers in the report. We are going to make 14 15 it clear throughout the text that there is great limitation to these numbers and caveat them quite 16 substantially. All tables that provide NRC-generated 17 numbers are going to have a caveat on every page of 18 19 the table so no one can yank it out.

But the reason we decided to go ahead and 20 keep those numbers in the report or essentially to 21 keep quantifying as part of the project was because 22 that as part of the proof-of-concept study, we want to 23 be able to demonstrate what these methods could 24 25 accomplish.

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We're not going to put any value on what we calculate. We're not going to draw any conclusions on what failure modes are more important than other failure modes or what the final system failure probability means.

We want to be able to just go through the exercise to demonstrate the capabilities of these models and what you can use them for. So that is the reason we have kept the numbers in. But, again, like I said, we were heavily caveating them and making sure that they are not going to be misused.

MEMBER STETKAR: We all know the fault trees can add and multiply. So showing that a fault tree can add and multiply is showing a proof of concept for a fault tree model. Why do you need models to show that proof of concept?

17 I know the fault tree can add and18 multiply. We have been doing that for a long time.

MR. KURITZKY: We understand that. I guess, you said that you had identified for demonstrating them?

22 MR. CHU: Yes, to start with, since the 23 order in which failure occur affects the result. So 24 in our quantification, we need to account for the 25 order in which failure occurs. And the Markov model

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276 is an actual model that allows you to account for it. When you come to fault trees, you know, you use the standard fault tree computation method. It just multiplies the ability that you are not quite accounting for that. So fault tree is not very а qood quantification tool for the model as far as --MEMBER STETKAR: Correct, but we also know that without actually running the numbers through. Ι don't see the benefit from publishing tables of numbers and running the numbers through the models because everything you have said we know. MR. KURITZKY: But, again, what we are trying to do is demonstrate in this proof-of-concept study as to what is potentially capable using these In other words, we would intend if the data models. were good, if the various lists of things that we now have as rough spots can somehow be polished over, that this is what we would use these models for. that would include quantification. And And it would include things like make a determination as to which failure modes are more important, which

23 design features and, therefore, which design features 24 you may want to look at more carefully, may want to 25 redesign or --

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MEMBER STETKAR: Did you have a question that fault trees could not do that or that Markov models could not do that? In other words, this proof of concept of a methodology I don't understand why we need to quantify at this particular moment for identifying failure modes.

Process you used, I think that's important for looking at the timing of failures to identify the fact that that may be important for identifying specific combinations of failures within a specific sequence, that Markov models can do that.

They have that capability for which fault trees do not. That is important. And demonstrating that that methodology can do that is important. And why that might be important in this context, where it might not be so important for other more traditional things I think is important.

But actually turning the crank and churning out numbers --

20 MR. KURITZKY: Right. Again, the numbers 21 in question are not the output numbers. It's the 22 input numbers. It was the idea of --

23 MEMBER STETKAR: Except that the input 24 numbers are the numbers you have absolutely no 25 confidence in.

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278 MR. KURITZKY: Right. MEMBER STETKAR: What I'm concerned about -- and I wasn't at the Subcommittee meeting. So I don't have the benefit of the discussions there. We have suffered in the PRA community for years and years and years of NUREG reports being published with tables of numbers in them, in many cases with very large caveats on those tables, caveats notwithstanding those numbers are extracted as NRC-sanctioned numbers. And they are used. And especially if there are delays in completion of this project to actually integrate the software analysis, those numbers will take on a life of their own with people who are being charged now to design certification, develop PRAs for for COL applications that are going to be coming in over the next two to five years, while you are still working on integrating the software analysis. That is the primary concern that I have about the numbers in there. And I don't see the benefit of having quantification in there as а demonstration --I am very sensitive --MR. KURITZKY: because, I mean, I understand. I am very sensitive to that concern. I think our reasoning was really to

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demonstrate that the hierarchical vision method that was used with those numbers, which we feel may be a valid method to use if you had better numbers to stick into the sausage grinder, would, in fact -- that is what we are kind of demonstrating, that you can use this method. And it would work.

I am sensitive to the concern over those 7 I guess we just have to rethink whether, 8 numbers. 9 actually, the final numbers -- I mean, we want to demonstrate some of the numbers that are out there 10 just as part of the discussion on what's available. 11 12 But as far as the tables at the end that we have come up with, the numbers, we will take a re-look at that 13 to see whether it is true value to that and whether 1415 the risk outweighs any potential benefit.

MEMBER BLEY: Just on the last thing you said, Alan, the NRC has published the handbook for parameter estimation for PRAs. And that walks you all through doing the hierarchical phase and how it works.

So I guess it seems the only benefit is to say, "Well, we did a lot of this. And, here, look. We did it," rather than some real technical value coming from it.

24 MR. KURITZKY: Okay. Do you want 25 anything?

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280 MR. CHU: The hierarchical base analysis 1 2 did basically was to capture the population we variability of different sources of data. 3 It's 4 questionable whether or not those data are good or 5 applicable to the specific application. But this kind of population variability 6 7 curve in general represents a prior distribution of a 8 single basing analysis. So if you want to have better 9 data, you need to collect application-specific data 10 and then use it to update this population variability. Of course, in our study, we don't have any specific 11 data to use. 12 Going back to in technical availability 13 modeling, often you ask typical questions, like, say 14 15 in the case of digital systems, there are digital design features that we know. 16 See, use a watch-stop 17 timer. Then it's reasonable to ask, you know, 18 19 what is the benefit of having this watch-stop timer or in the case of this system, there are two micro 20 processes that are redundant. So what is the benefit 21 of having the redundancy? 22 So when we developed this model and using 23 our model, we can answer that kind of question. So we 24 25 can perform with numbers, with data. And we can **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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perform sensitivity calculations to provide answers to these kinds of questions. This kind of illustrate the usefulness of the model.

MEMBER STETKAR: But as a proof of concept of a methodology, we know we can do that because we do that all the time in terms of developing risk importance measures and evaluating the effects of redundancy and the effects of common cause failures.

9 to the purpose of this Ι come back 10 And that purpose, as I understood it, was exercise. to examine the benefits and limitations 11 the of existing analysis methods, not numbers, just analysis 12 methods, with respect to digital I&C systems. 13

We know we can do sensitivity studies. We know we can evaluate importance measures. We know that if, indeed, the conclusion is that the fault tree methodology is applicable, we know what we can do with that. That's close to 35 years of experience doing fault tree analysis.

20 Ιf there unique features of are а particular methodology, like we discussed earlier, 21 But, again, I don't see where the 22 that's important. actual quantification at this stage, given the paucity 23 of applicable data, is a real net benefit and not only 24 25 is a real net benefit, it could be a detraction from

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1	what you're trying to accomplish here.
2	MEMBER APOSTOLAKIS: How would it hurt
3	your message if you remove the tables?
4	MR. KURITZKY: And that's a valid point.
5	We'll re-look at that. I think, like anything else,
6	when you give an example, sometimes it helps make
7	things clearer in the reader's mind. But in this
8	particular case, with the risk of misuse being as
9	potentially high as it may be
10	MEMBER APOSTOLAKIS: Well, yes.
11	MR. KURITZKY: it may be that we can
12	suffice with sufficient explanation on the concept
13	that you don't necessarily need to show an example or
14	numbers to make a point. So, I mean
15	MEMBER APOSTOLAKIS: Bayesian method
16	there. What do we call the hierarchical?
17	MR. KURITZKY: Hierarchical.
18	MEMBER APOSTOLAKIS: I can see
19	practitioners saying, "This number is good because it
20	was derived by a sophisticated method by the NRC or
21	its contractors."
22	MEMBER STETKAR: Using data derived from
23	
24	MEMBER APOSTOLAKIS: Using data
25	MEMBER STETKAR: Oak Ridge National
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Laboratory and
MR. KURITZKY: Now, also, to be fair, too,
I am very sensitive to the concern and will rethink
it. But, I mean, anybody can take anything out of
context. They read the Washington Post.
(Laughter.)
MEMBER STETKAR: They will. They will.
And you have to recognize we're dealing with
MEMBER APOSTOLAKIS: I like the Post.
MR. KURITZKY: I like it, too. I read it
every day.
MEMBER STETKAR: In this Committee, we are
dealing with submittals from design certifications
that are I'm assuming struggling with the issues of
trying to develop PRA models for their digital I&C
systems in real time, I mean, now. And those people
given the opportunity to use numbers that are
published in a NUREG report, NUREG/CR, whatever, we
will certainly refer to them.
MR. KURITZKY: Now, that's a very good
MEMBER SIEBER: They don't have better
numbers.
MEMBER STETKAR: And they don't. And they
don't have any better numbers.
MEMBER APOSTOLAKIS: It is such a nice
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284 1 phrase, "hierarchical Bayes." 2 MR. KURITZKY: One thing I wanted to point 3 out I did not point out previously was while we had to 4 use hierarchical Bayesian method, we demonstrated one 5 because of the fact we had very poor data from various sources, the applicant may, in fact -- we don't know, 6 but applicant may have a very good manufacturer vendor 7 8 database. They may not use that method. They may use 9 some totally other method. We don't know. 10 MEMBER STETKAR: They won't have one. 11 MR. KURITZKY: They might. MEMBER STETKAR: They won't. 12 MEMBER APOSTOLAKIS: Three hundred? 13 That really jumps up off the page, an error factor of that 14 15 magnitude. I really think the message from all of this discussion is you really ought to think very hard 16 about numbers. 17 And let's move on to your 15. 18 MR. KURITZKY: Yes. Okay. Oh, wait. 19 The last bullet because there is one very dear to you. 20 MEMBER APOSTOLAKIS: 21 Yes. You agree. 22 Okay. Yes. And now it's in the 23 MR. KURITZKY: abstract --24 25 MEMBER APOSTOLAKIS: Just say we agree. **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1	MR. KURITZKY: and section 1.2 in
2	objectives and section 1.2 in scope. We have it
3	MEMBER APOSTOLAKIS: The abstract, yes.
4	MR. KURITZKY: The abstract says it.
5	Everywhere says it. No one can read this report and
6	not realize it now.
7	MEMBER APOSTOLAKIS: Front cover?
8	MR. KURITZKY: It wasn't on the front
9	cover. I will take that back.
10	MEMBER APOSTOLAKIS: Okay.
11	VICE CHAIRMAN BONACA: It was in section
12	1.
13	MR. KURITZKY: What's that?
14	VICE CHAIRMAN BONACA: It was in section
15	1.
16	MR. KURITZKY: It was in section 1.3 in
17	the scope, I know. It was as an example, but it was
18	there. But now it's really there. Not it's really
19	there.
20	MEMBER APOSTOLAKIS: Very good. So next
21	steps.
22	MR. KURITZKY: Okay. Next steps in the
23	project. Again, we will finish applying the two
24	methods in the first benchmark studies, the digital
25	feedwater control system, which will help us gain
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further insights into the reliability modeling of systems.

The idea of major contributors to the system is obviously not so much now that we are de-emphasizing quantification of the numbers, but from a quantitative sense, we can get some further insights there.

8 Also, will further determine the we existing capabilities limitations of the methods as we 9 complete the study. We will attempt to compare the 10 results of insights from this study to the sister 11 12 studies. These are parallel studies being done with dynamic methods on the same system. Again, there is 13 some substantial difference in boundary conditions for 14 15 \_ \_

16 MEMBER APOSTOLAKIS: What is the sister 17 study?

18 The dynamic, the dynamic MR. KURITZKY: 19 method studies. There some substantial are differences in boundary conditions between those two 20 21 studies. So it's going to be somewhat limited of a comparison, but we will do the best that we can. 22 And 23 the NUREG/CR on the first benchmark is due to come out in a couple of months. So we will have more 24 25 information then.

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We will use a reactor protection system, the TELEPERM system, the design requirements for safety relates. This is obviously much different than for a control system. And so we have expected the modeling issues may be different also.

In one specific case, in looking at the 10 11 protection system, we no longer have to deal with the 12 complexity of the feedback that you get with a control system, but we will have to look at other things, such 13 communication and synchronization between 14 as the 15 redundant channels and other aspects of protection system failures. 16

MEMBER APOSTOLAKIS: What are the two traditional methods?

MR. KURITZKY: The fault tree method andthe Markov method.

21 MEMBER BLEY: You are only going to look 22 at the reactor trip function under the TELEPERM? 23 MR. KURITZKY: We will be looking at 24 reactor trip function.

MEMBER APOSTOLAKIS: Are you done?

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1	MR. KURITZKY: I am done.
2	MEMBER APOSTOLAKIS: Any other comments or
3	questions from the Committee?
4	MEMBER MAYNARD: I've got a couple.
5	MEMBER APOSTOLAKIS: Sure.
6	MEMBER MAYNARD: Before I start, though,
7	you have done a lot of good work here. And my
8	comment, the couple of concerns I have, really aren't
9	negative about the effort and stuff that you have
10	done.
11	One concern is a couple of times we talked
12	about what's desirable and an ideal system. And I
13	really think that what the NRC needs to be developing
14	right now is what is the optimum for the state of
15	knowledge and where we are at right now.
16	I am a little concerned that we might be
17	encouraging a higher level of detail and more
18	complexity than what is achievable and what would be
19	practical and what is really needed for assuring
20	adequate protection of health and safety of the
21	public, so a little concern on my part as to, are we
22	trying to say that the ideal one is where we need to
23	be right now and is that really too complex? So
24	that's just one comment I have.
25	And the other gets into timing in that
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289 1 with the way we are going, we could easily be working 2 on a number of these things well after we have 3 submittals that we are having to review and evaluate 4 right now. That's why I get back to more of what is 5 the optimum from a regulatory standpoint that is needed based on what is the current state of knowledge 6 and availability of information. 7 8 You know, we do have applications coming 9 Some are going to be coming in here real soon in. that we need to be evaluating now and can't be waiting 10 for a number of years down the road? 11 Those are my two comments/concerns. 12 And that's not derogatory in any way on your stuff. 13 MEMBER APOSTOLAKIS: And I think those 14 15 comments would be even more important when the new plant comes. 16 17 MEMBER STETKAR: Just remember even Duke is replacing their entire 18 looking at reactor 19 protection safeguards, actually, now. MR. KURITZKY: 20 I don't think they are using any risk --21 22 MEMBER STETKAR: They are not using risk 23 guard. MR. KURITZKY: Right, right. Based on the 24 25 **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

290 MEMBER APOSTOLAKIS: They are already an 1 2 approved platform, right? 3 MR. KURITZKY: That's right. 4 MEMBER APOSTOLAKIS: Without any risk. 5 They are not using risk MEMBER STETKAR: 6 quard. 7 MEMBER APOSTOLAKIS: Okay. 8 MR. KURITZKY: But let me just talk to Dr. 9 Maynard's comments. I agree we have to make sure that 10 the report is clear that this is not what we expect from an applicant. This is doing the research to help 11 12 us learn what we feel should go in the system, then determine what is minimally necessary. 13 The second one versus timing, that is an 14 15 important concept, but I think that is one that has been addressed by the fact that in the 16 steering 17 committee, there is a task working group that is looking at risk-informed applications of digital I&C. 18 19 And they have an interim staff guidance document. It is out in draft. I mean, it is close to 20 becoming final now. And that is specifically for new 21 In other words, what is acceptable under a 22 reactors. part 52 PRA for digital system modeling there? 23 The staff has made a clear distinction 24 25 that there is a certain level that you need to go to **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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to demonstrate that you don't have any -- you don't 2 challenge the safety goal, there are no significant vulnerabilities that may be out there in the system 4 design. Okay? And you may only have to do a certain 5 level of pedigree of model to be able to establish that; whereas, what we are looking at under this work 6 7 is trying to get the basis for а more robust 8 risk-informed framework that would allow a lot of 9 decisions, going back to the idea of Oconee.

10 If Oconee had, in fact, come in with a risk-informed submittal, how could we evaluate that? 11 12 That is where we would want to dive into more of the detail. 13

the staff really qoinq 14 So is on а 15 two-pronged approach, where we have existing guidance that is almost final now that is going to be the 16 17 guidance for something coming with a new application. And what we are really pursuing is the longer-term, 18 19 more robust risk-informed framework.

And I understand all 20 MEMBER MAYNARD: And I appreciate your comments there. 21 that. If 90 percent of the stuff is already done by the time we 22 get there, what is the value-added to that thing? 23 24 MEMBER SIEBER: It seems to me that you 25 great lengths going to form this are to very

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probabilistic analysis for digital instrument system. And if I compare that to what is done with analog instruments, it would seem to me that the answer is going to come out that the failure rates for digital instruments just because of all this detail, it is going to be higher than for analog instruments. Is that a true fact?

8 MR. KURITZKY: Well, I can't tell you 9 whether that is going to be a true fact. I mean, that 10 goes back to the same comment that we had before. 11 When you break something down to a lot of little parts 12 and then add up all the failure probabilities, you 13 know, you end up with something that is not realistic.

14 MEMBER SIEBER: It could be 10 times, 100 15 times different.

MR. KURITZKY: But, again, you know, we don't know. And, again, like we said, we don't know what level of detail ultimately we would find acceptable for some type of a method, too. But that obviously --

21 MEMBER SIEBER: If that happens, then I 22 have to ask, why are we doing this? Because it 23 probably is not correct.

24 MR. KURITZKY: Right. But if we knew that 25 right now, you're right. We wouldn't be doing this.

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293 But I think we're not in a position yet that we know 1 2 that. STETKAR: 3 MEMBER Ιt is really the 4 compatibility with the data. I mean, you cannot 5 separate the modeling from the data compatibility. That has always been the problem. 6 7 MEMBER SIEBER: Yes, but you can look at 8 it as a system function. 9 MEMBER STETKAR: That's right. I mean, 10 you have to have that higher --MEMBER SIEBER: Techniques to making the 11 actually work properly, as opposed 12 software to figuring out how often it is going to fail. 13 MR. KURITZKY: But we are in the PRA 14 15 group. So we have to figure out how often it is going to fail. 16 17 MEMBER BROWN: John's point is very much on the number. Okay? I mean, there is a vast 18 19 population of operational digital applications today. They are vastly more reliable and online and more 20 failure-resistant than the analog systems. 21 They don't drift. So you don't have to 22 23 deal with that. They self-check themselves from an alignment standpoint. They tell you when something is 24 25 -- you know, put a little test resistor in and say, **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

"What temperature am I getting?"

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You're running against it. Is the thing working? They just work so well. Yet, by the time you stack up the numbers, you are applying a level that we used to apply to the analog systems down here. Now you are putting the bar up here for the digital systems to apply.

8 And I can only speak from experience that 9 you will get far more value-added out of making sure the software that you apply in these digital systems 10 is controlled, is simple, easy to make sure it works, 11 12 as opposed to that's kind of a -- I mean, I'm just giving you an opinion based on the approach of doing 13 about six or seven different or eight designs that all 14 15 went on the micro processor, digital-based system. And stuff came out much, much better. 16

And this stuff is what you want to put in the new plants. You do not want to go back and force us to stick with analog stuff that nobody builds anymore.

21 MEMBER SIEBER: You probably can't because 22 a lot of those vendors don't make those anymore.

23 MEMBER BROWN: Yes. There's nobody that 24 comes out and does any analogs other than little parts 25 of front ends for A to D conversion. And after that,

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1	it is all digital.
2	MEMBER SIEBER: Well, your background is
3	Navy. And I have some of that in me, too. And that
4	philosophy was simplicity in the design of this.
5	MEMBER BROWN: And that is the whole
6	argument that I would try to bring to this. If I were
7	brought in for anything, that is the argument I would
8	bring in. Simple software. If you get complex
9	software, you get more than 15-20 thousand lines of
10	code, you are lost.
11	MR. KURITZKY: I don't think anybody is
12	disagreeing with that.
13	MEMBER BROWN: Even if you have that much,
14	you don't need it most
15	MR. KURITZKY: We're getting crossed goals
16	here. The goal of this work is to look at calculating
17	the probability of the failure. The fact that it
18	makes sense to have simpler and more effective and
19	higher reliability software or in digital systems to
20	put in place the practice that will ensure that, we're
21	all for it. But that is not the goal of
22	MEMBER BROWN: No. I understand. But you
23	are trying to put the PRA emphasis. The licensee
24	and/or whoever designs the stuff has to do that work.
25	That costs money. And that takes time. Software
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takes time.

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MR. KURITZKY: Right. But the reliability, what we're talking about is not -- we're not requiring anybody who even wants to apply to backfit or to replace or to upgrade a digital system to do this. Rather, they can go right now with the existing deterministic framework and make that change.

8 What we are just saying is if the licensee 9 would like to make a risk-informed argument as to why 10 they are replacing system X with system, digital 11 system, Y, then we would ultimately have to review 12 that argument. So we are trying to get in place the guidance that we would give to the person in NRR or 13 NRO, whoever has to go ahead and do that review. 14 So that is where the goal is of this work. 15

We certainly agree with everything you said about improving the reliability of the systems and making them simpler. It's just that that is not the goal that we're focusing on right now. That is not our charter, so to speak.

We're trying to lay the framework and the groundwork for someone if they did want to come in with the risk-informed argument. That's optional.

24 MEMBER APOSTOLAKIS: Any other comments 25 from anyone?

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1	(No response.)
2	MEMBER APOSTOLAKIS: Well, thank you very
3	much, gentlemen. Back to you, Mr. Chairman.
4	CHAIRMAN SHACK: Okay. I think that
5	you're on schedule. Take a 15-minute break,
6	gentlemen. No more transcript.
7	(Whereupon, the foregoing matter was concluded at 3:31
8	p.m.)
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