

Comments re. paper titled "Structural Integrity of SG Tubes with AVB Wear," by R. Keating (W), H. Lagally (W), and R. Lieder (Seabrook), June 2001

- This paper maintains that ligament failure of flat wear scar, 0.3 inches axial length, does not constitute "burst."
  - Structural performance criteria do not apply to such ligament failure.
  - Minimum required ligament is controlled by accident leakage criterion. Satisfied by limiting probability of ligament tearing at MSLB pressure to appropriate value (e.g., 95%).
- Staff comments:
  - Ligament tearing of the wear scar may lead to "hole" with diameter of approx. 0.3 inches, not a throughwall crack with limited crack opening displacement.
  - Arguably, this is "burst."
  - Irrespective, a tube whose condition is such that it may leak several dozen gpm under pressures slightly above MSLB pressure under normal temperature conditions may have significant implications for severe accident risk.
    - The risk implications of the proposed approach need to be evaluated.