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Structural Integrity Evaluation of Reactor Vessel Upper Head Penetrations to Support Continued Operation: Diablo Canyon Units 1 and 2



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Vessel Upper Head Penetrations to Support
Continued Operation: Diablo Canyon Units 1 and 2**

S. Jirawongkraisorn

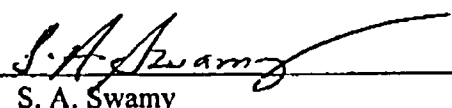
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1 INTRODUCTION

In September of 1991, a leak was discovered in the Reactor Vessel Control Rod Drive Mechanism (CRDM) head penetration region of an operating plant. This has led to the question of whether such a leak could occur at the CRDM or head vent nozzle penetrations of Diablo Canyon Units 1 and 2. It shall be noted that the term "CRDM" is used generically in this report for any of the reactor vessel upper head penetrations which includes the control rod mechanism, instrumentation penetrations, Part Length CRDM and spare penetrations. The typical geometry of interest for a CRDM penetration nozzle is shown in Figure 1-1. Throughout this report, the penetration rows have been identified by their angle of intersection with the head. The locations of the head penetrations for Diablo Canyon Units 1 and 2 are shown respectively in Figures 1-2 and 1-3 [1A, 2A] and the angles for each penetration are identified in Tables 1-1 and 1-2 [1B, 1C, 2B, 2C] respectively.

The CRDM leak resulted from cracking in Alloy 600 base metal, which occurred in the outermost penetrations of a number of operating plants as discussed in Section 2. This outermost CRDM location, as well as a number of intermediate CRDM locations, and the head vent nozzle were chosen for fracture mechanics analyses to support continued safe operation of Diablo Canyon Units 1 and 2 if such cracking were to be found. The dimensions of all the CRDM penetrations are identical, with a 4.00 inch Outside Diameter (OD) and a wall thickness of 0.625 inches [1D, 2D]. For the head vent, the OD is 1.05 inches and the wall thickness is 0.154 inches [1E, 2E]. All of these dimensions are summarized in Table 6-2.

The basis of the analysis was a detailed three-dimensional elastic-plastic finite element stress analysis of several penetration locations, as described in detail in Section 5 and a fracture analysis as described in Section 6. The fracture analysis was carried out using crack growth rates recommended by the EPRI Materials Reliability Program (MRP). These rates are consistent with service experience. The results are presented in the form of flaw tolerance charts. If indications are found, the charts will determine the allowable service life of safe operation. The service life calculated in the flaw tolerance charts are all in Effective Full Power Years (EFPY).

Note that there are several locations in this report where proprietary information has been bracketed and deleted. For each of the bracketed locations, reasons for proprietary classifications are given using a standardized system. The proprietary brackets are labeled with three different letters to provide this information. The explanation for each letter is given below:

- a. The information reveals the distinguishing aspects of a process or component, structure, tool, method, etc., and the prevention of its use by Westinghouse's competitors, without license from Westinghouse, gives Westinghouse a competitive economic advantage.
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- e. The information reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.

Table 1-1 Diablo Canyon Unit 1 Head Penetration Nozzles with Intersection Angles Identified [1B, 1C]					
Nozzle No.	Angle (Degrees)	Nozzle No.	Angle (Degrees)	Nozzle No.	Angle (Degrees)
1	0.0	28	24.8	55	35.1
2	8.0	29	24.8	56	35.1
3	8.0	30	26.2	57	35.1
4	8.0	31	26.2	58	36.3
5	8.0	32	26.2	59	36.3
6	11.4	33	26.2	60	36.3
7	11.4	34	26.2	61	36.3
8	11.4	35	26.2	62	38.6
9	11.4	36	26.2	63	38.6
10	16.2	37	26.2	64	38.6
11	16.2	38	30.2	65	38.6
12	16.2	39	30.2	66	38.6
13	16.2	40	30.2	67	38.6
14	18.2	41	30.2	68	38.6
15	18.2	42	30.2	69	38.6
16	18.2	43	30.2	70	44.3
17	18.2	44	30.2	71	44.3
18	18.2	45	30.2	72	44.3
19	18.2	46	33.9	73	44.3
20	18.2	47	33.9	74	48.7
21	18.2	48	33.9	75	48.7
22	23.3	49	33.9	76	48.7
23	23.3	50	35.1	77	48.7
24	23.3	51	35.1	78	48.7
25	23.3	52	35.1	79	48.7
26	24.8	53	35.1		
27	24.8	54	35.1		

Table 1-2

Diablo Canyon Unit 2 Head Penetration Nozzles with Intersection Angles Identified [2B, 2C]

Nozzle No.	Angle (Degrees)	Nozzle No.	Angle (Degrees)	Nozzle No.	Angle (Degrees)
1	0.0	27	26.2	53	36.3
2	11.4	28	26.2	54	38.6
3	11.4	29	26.2	55	38.6
4	11.4	30	30.2	56	38.6
5	11.4	31	30.2	57	38.6
6	16.2	32	30.2	58	38.6
7	16.2	33	30.2	59	38.6
8	16.2	34	30.2	60	38.6
9	16.2	35	30.2	61	38.6
10	18.2	36	30.2	62	44.3
11	18.2	37	30.2	63	44.3
12	18.2	38	33.9	64	44.3
13	18.2	39	33.9	65	44.3
14	23.3	40	33.9	66	45.4
15	23.3	41	33.9	67	45.4
16	23.3	42	35.1	68	45.4
17	23.3	43	35.1	69	45.4
18	24.8	44	35.1	70	45.4
19	24.8	45	35.1	71	45.4
20	24.8	46	35.1	72	45.4
21	24.8	47	35.1	73	45.4
22	26.2	48	35.1	74	48.7
23	26.2	49	35.1	75	48.7
24	26.2	50	36.3	76	48.7
25	26.2	51	36.3	77	48.7
26	26.2	52	36.3	79	48.7

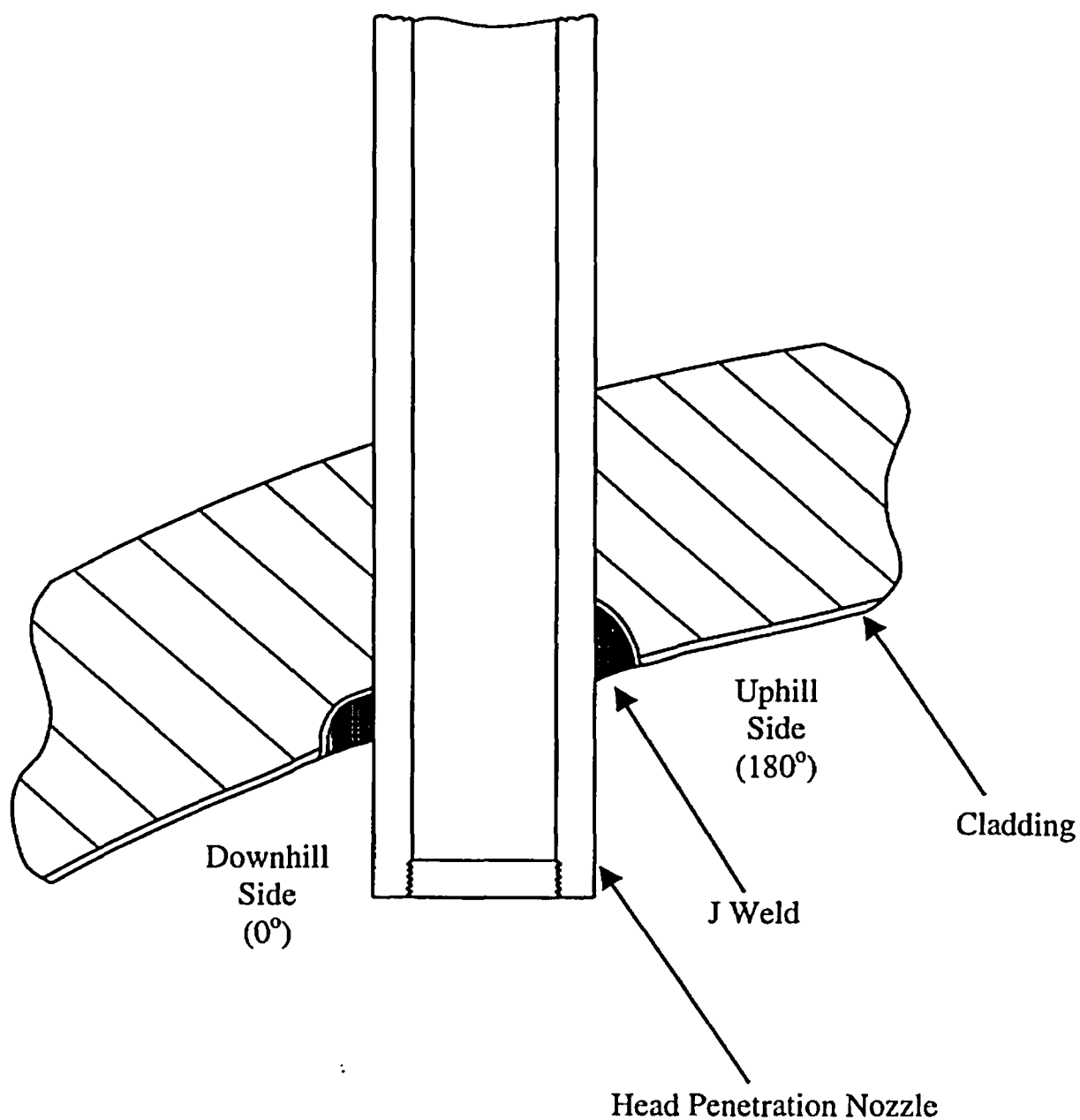


Figure 1-1 Typical Reactor Vessel Control Rod Drive Mechanism (CRDM) Penetration

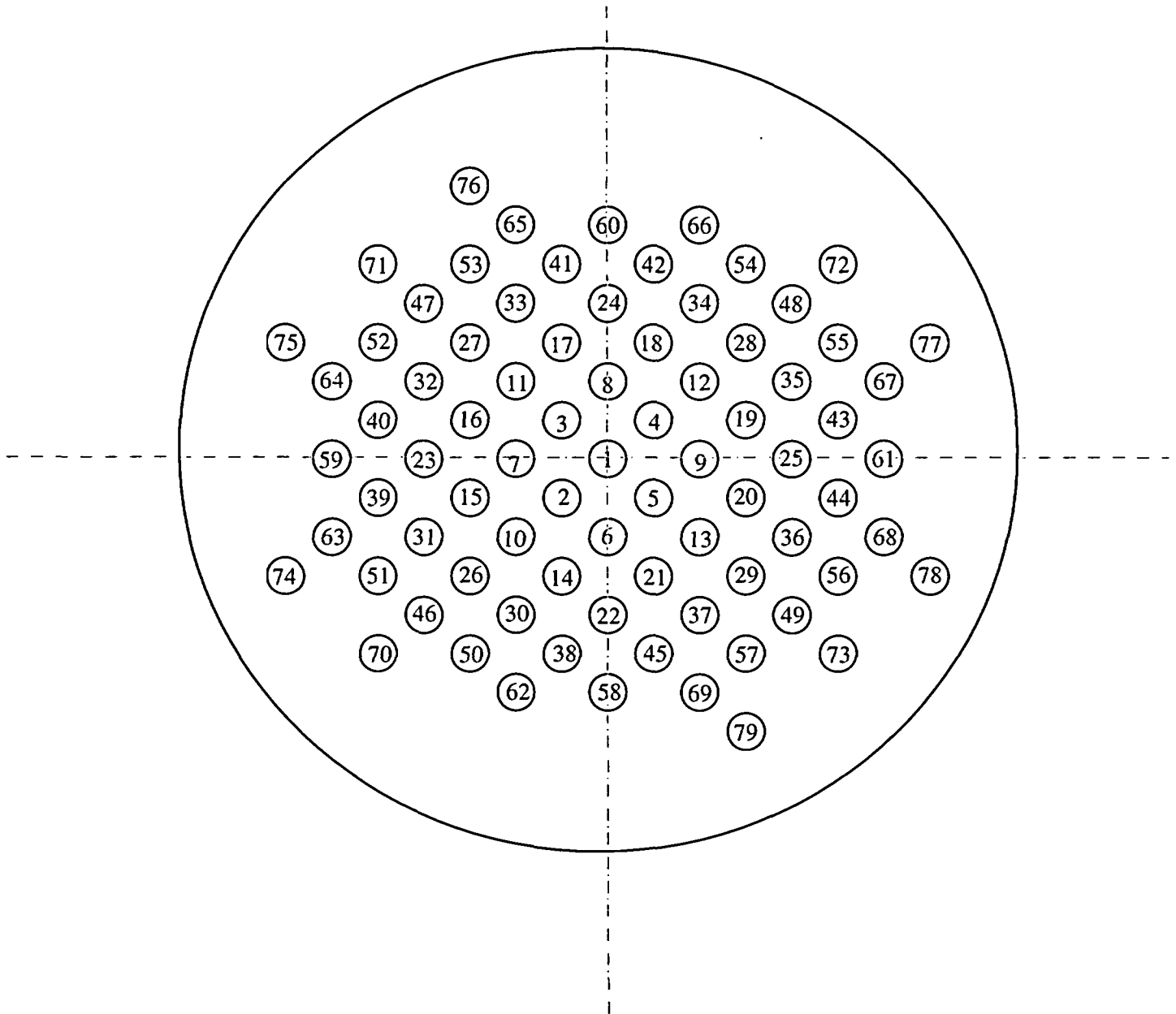


Figure 1-2 Location of Head Penetrations for Diablo Canyon Unit 1 [1A]

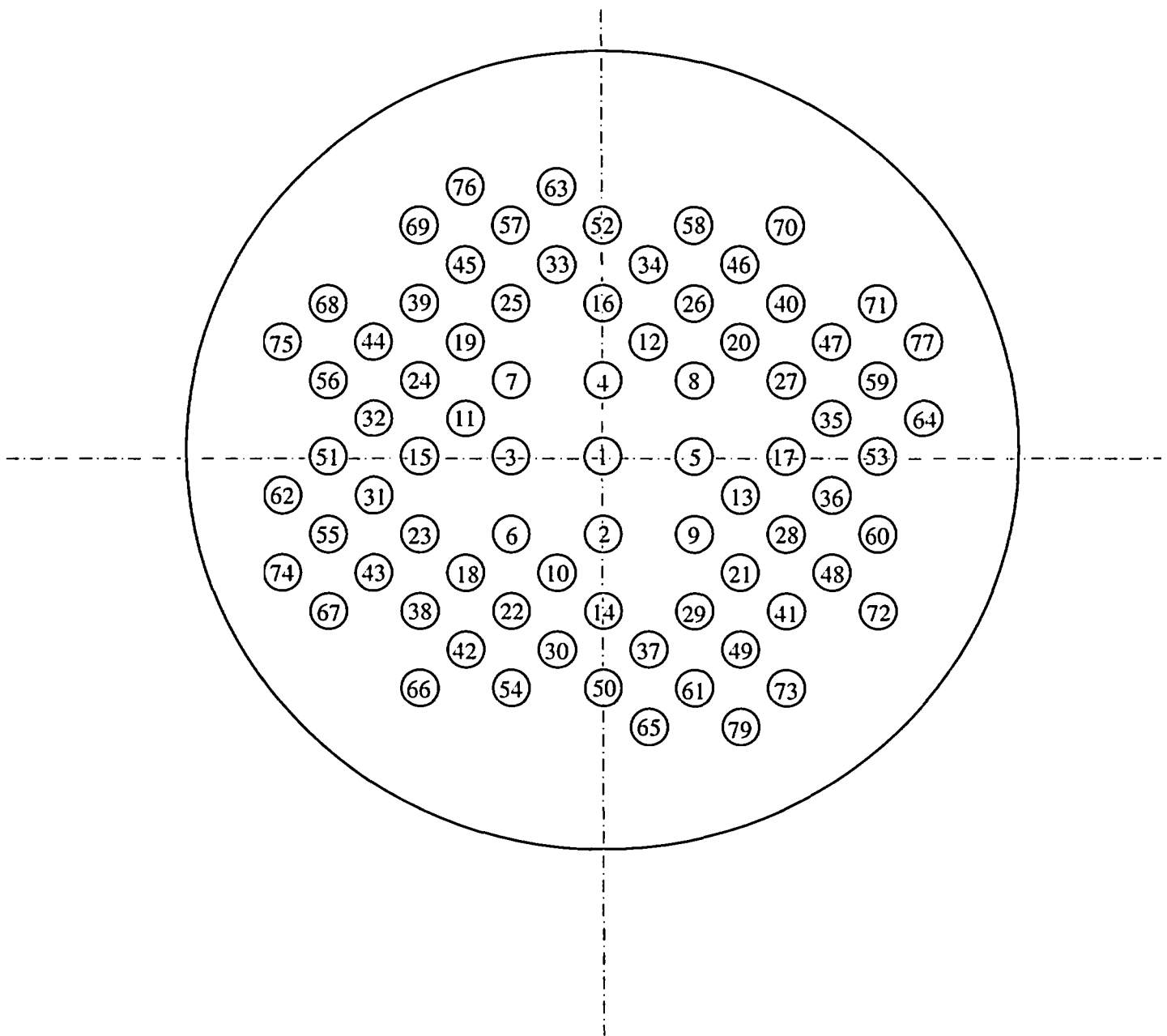


Figure 1-3 Location of Head Penetrations for Diablo Canyon Unit 2 [2A]

2 HISTORY OF CRACKING IN HEAD PENETRATIONS

In September of 1991, leakage was reported from the reactor vessel CRDM head penetration region of a French plant, Bugey Unit 3. Bugey 3 is a 920 megawatt three-loop Pressurized Water Reactor (PWR) plant which had just completed its tenth fuel cycle. The leak occurred during a post ten year hydrotest conducted at a pressure of approximately 3000 psi (204 bar) and a temperature of 194°F (90°C). The leak rate was estimated to be approximately 0.7 liter/hour. The location of the leak was subsequently established on a peripheral penetration with an active control rod (H-14), as seen in Figure 2-1.

The control rod drive mechanism and thermal sleeve were removed from this location to allow further examination. A study of the head penetration revealed the presence of longitudinal cracks near the head penetration attachment weld. Penetrant and ultrasonic testing confirmed the cracks. The cracked penetration was fabricated from Alloy 600 bar stock (SB-166), and has an outside diameter of 4 inches (10.16 cm) and an inside diameter of 2.75 inches (7.0 cm).

As a result of this finding, all of the control rod drive mechanisms and thermal sleeves at Bugey 3 were removed for inspection of the head penetrations. Only two penetrations were found to have cracks, as shown in Figure 2-1.

An inspection of a sample of penetrations at three additional plants were planned and conducted during the winter of 1991-92. These plants were Bugey 4, Fessenheim 1, and Paluel 3. The three outermost rows of penetrations at each of these plants were examined, and further cracking was found in two of the three plants.

At Bugey 4, eight of the 64 penetrations examined were found to contain axial cracks, while only one of the 26 penetrations examined at Fessenheim 1 was cracked. The locations of all the cracked penetrations are shown in Figure 2-1. At the time, none of the 17 CRDM penetrations inspected at Paluel 3 showed indications of cracking, however subsequent inspections of the French plants have confirmed at least one crack in each operating plant.

Thus far, the cracking in reactor vessel heads not designed by Babcock and Wilcox (B&W) has been consistent in both its location and extent. All cracks discovered by nondestructive examination have been oriented axially, and have been located in the bottom portion of the penetration in the vicinity of the partial penetration attachment weld to the vessel head as shown schematically in Figure 1-1.

One small, outside diameter initiated, circumferential flaw was found during destructive examination at Bugey 3. The flaw was found to have resulted from Primary Water Stress Corrosion Cracking (PWSCC) as a consequence of leakage of the PWR water from an axial through-wall crack into the annulus between the penetration and head.

Since November 2000, leaks were discovered in a total of 29 CRDM nozzles at seven Babcock & Wilcox designed plants:

- Oconee 1 (1 leaking nozzle)

- Oconee 2 (4 leaking nozzles)
- Oconee 3 (9 leaking nozzles)
- ANO-1 (1 leaking nozzle)
- Crystal River Unit 3 (1 leaking nozzle)
- Three Mile Island 1 (5 leaking nozzles)
- Davis Besse (8 leaking nozzles)

In addition, five of the eight smaller diameter thermocouple nozzles at Oconee 1, and all eight at Three Mile Island 1, were discovered to have leaks. All of these leaks were first detected during visual inspections of the top surface of the vessel heads for boric acid crystal deposits. In all cases, except Davis Besse, the quantity of boric acid crystals at each nozzle location was small ($<1 \text{ in}^3$).

Destructive examinations of several specimens from cracked Oconee 1 and 3 nozzles showed that the leaks were the result of Primary Water Stress Corrosion Cracking (PWSCC). Non-destructive examinations of the leaking CRDM nozzles showed that most of the cracks were axially oriented, originating on the outside surface of the nozzles below the J-groove weld and propagating primarily in the nozzle base material to an elevation above the top of the J-groove weld. Leakage could then pass through the annulus to the top of the head where it was detected by visual inspection. In some cases the cracks initiated in the weld metal or propagated into the weld metal, and in a few cases the cracks propagated through the nozzle wall thickness to the inside surface.

In addition to the predominantly axial cracks, several nozzles had cracks on the outside surface of the nozzle approximately following the weld contour above or below the J-groove weld. At least eight of these nozzles (three in Oconee 3, one in Oconee 2, one in Crystal River 3, and three in Davis Besse) were found to have cracks approximately following the weld contour just above the J-groove weld. Two of the nozzles had relatively short and shallow cracks. Two of these nozzles had cracks either through-wall or essentially through-wall over an arc length of about 165° around the nozzle centered approximately about the nozzle uphill side. Cracks which follow the weld contour are a greater concern than axial cracks in that they raise the potential for a nozzle to be ejected if a through-wall crack extends more than about []^{a,c,e}

Seventeen additional non-leaking Oconee 1 and nine non-leaking Oconee 3 CRDM nozzles were inspected by eddy current, ultrasonic testing, or eddy current and ultrasonic testing to assess the extent of the condition of non-leaking nozzles in the vessel head. No significant cracking was found in any of these additional nozzles.

The recent experience at Oconee, Three Mile Island, Crystal River, Davis Besse, and ANO-1 differs from previous industry experience in that the cracking appears to initiate primarily on the outside surface of the nozzle below the weld rather than on the nozzle Inside Diameter (ID) surface. Five of the nozzles had also developed OD-initiated flaws approximately following the contour of the top of the J-groove weld. These CRDM tubes have shown no pattern of cracking, whereas the previous CRDM tubes were cracking only in the outermost three rows.

The cracking has now been confirmed to be primary water stress corrosion cracking. Relatively high residual stresses are produced in the outermost CRDM penetrations due to the welding process. Other important factors which affect this process are temperature and time, with higher temperatures and longer times being more detrimental.

All three Nuclear Steam Supply System (NSSS) Owners Groups submitted safety assessments to the USNRC between 1993 and 1994 in response to the leakage observed in Bugey Unit 3. The analyses demonstrated that CRDM nozzles are capable of accommodating long through-wall axial flaws and the resulting leakage. The analyses also demonstrated that the CRDM nozzles are capable of accommodating significant circumferential flaws above the J-groove weld. After reviewing the safety assessment submitted by the industry and examining international inspection findings, the USNRC concluded that CRDM nozzle and weld cracking observed to that time in Pressurized Water Reactor (PWR) facilities was not an immediate safety concern.

USNRC issued Generic Letter (GL) 97-01, "Degradation of Control Rod Drive Mechanism Nozzle and Other Vessel Closure Head Penetrations," on April 1, 1997. Responses to GL 97-01 were predicated on the development of susceptibility ranking models to relate the operating conditions for each plant to the plant's relative susceptibility to PWSCC. The industry committed to surface examinations (i.e., eddy current) of the vessel head penetration nozzles for plants with the highest relative susceptibility ranking.

In response to the inspection findings at Oconee in November 2000 and because existing requirements in the ASME Code and NRC regulations do not adequately address inspections of RPV head penetrations for degradation due to PWSCC, the NRC then issued Bulletin 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles," dated August 3, 2001. In response to the bulletin, plans for inspecting the vessel head penetration nozzles and/or the outside surface of the reactor vessel head to determine whether the nozzles were leaking was provided by the industry.

On March 18, 2002, the NRC issued Bulletin 2002-01 in response to the head degradation found at Davis-Besse Nuclear Power Station, "Reactor Pressure Vessel Head Degradation and Reactor Coolant Pressure Boundary Integrity," which requested that information be provided on the reactor vessel head inspection and maintenance programs, the material condition of the reactor vessel heads, and the boric acid inspection programs.

As a result of the circumferential cracking of vessel head penetration nozzles at Oconee Nuclear Station 3 and other PWR facilities, the vessel head material degradation at Davis-Besse, and NRC review of the responses to NRC Bulletins 2001-01 and 2002-01, NRC has a number of concerns about the inspection requirements and programs for RPV head and VHP nozzles. Based on the experience and information currently available concerning cracking and degradation, until there is a better understanding of the wastage phenomenon and wastage rates, it may be necessary for inspection programs that rely on visual examinations to be supplemented with additional measures (e.g., volumetric and surface examinations) to demonstrate compliance with applicable regulations. The NRC issued Bulletin 2002-02, "Reactor Pressure Vessel Head and Vessel Head Penetration Nozzle Inspection Programs," dated August 9, 2002, requested that information be

provided on the inspection programs and any plans to supplement existing visual inspections with additional measures (e.g., volumetric and surface examinations).

Inspections performed at several PWR plants in late 2002 found leakage and cracks in nozzles or J-groove welds that have required repairs or prompted the replacement of the RPV head. In addition, as discussed in NRC Information Notice 2003-02, "Recent Experience with Reactor Coolant System Leakage and Boric Acid Corrosion," issued on January 16, 2003, leakage has recently occurred at some plants from connections above the RPV head and has required additional assessments and inspections to ensure that the leakage has not caused significant degradation of RPV heads.

Revising the ASME Code and subsequently the NRC regulations will take several years. The resulting inspection plans and responses to the NRC bulletins have provided reasonable assurance of adequate protection of public health and safety for the near term operating cycles, but cannot be relied upon to do so for the entire interim period until NRC regulations are revised. Consequently, it is necessary to establish a minimum set of RPV head inspection requirements, as a supplement to existing inspection and other requirements in the ASME Code and NRC regulations, through the issuance of NRC Order EA-03-009 on February 11, 2003. The first revised Order EA-03-009 was issued on February 20, 2004 to revise certain aspects of the original order in response to some of the common issues emerging from the numerous relaxation requests from the original order.

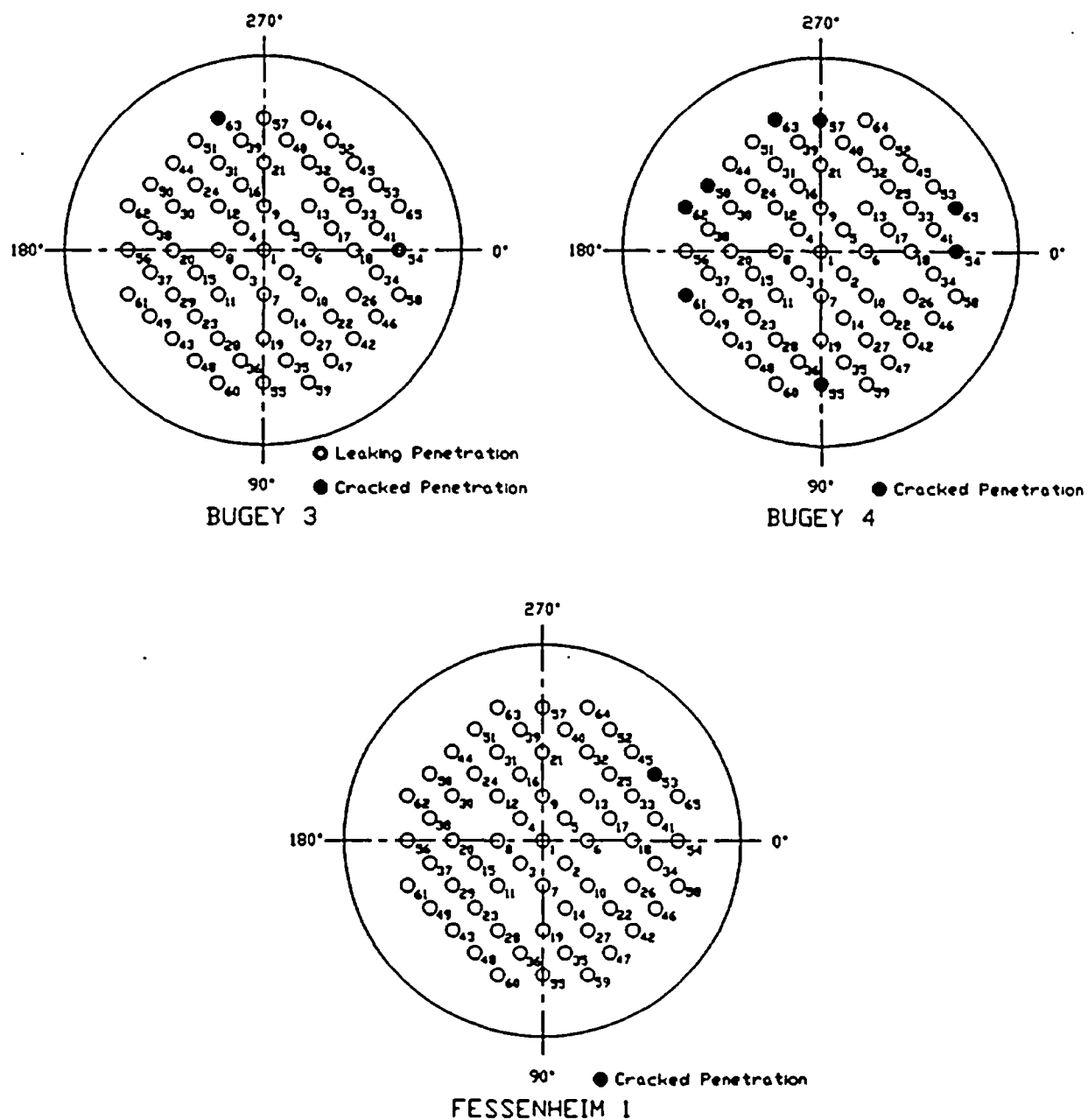


Figure 2-1 EDF Plant R/V Closure Head CRDM Penetrations – Penetrations with Cracking

3 OVERALL TECHNICAL APPROACH

The primary goal of this work is to provide technical justification for the continued safe operation of Diablo Canyon Units 1 and 2 in the event that cracking is discovered during in-service inspections of the Alloy 600 reactor vessel upper head penetrations.

3.1 PENETRATION STRESS ANALYSIS

Three-dimensional elastic-plastic finite element stress analyses were performed for a plant of similar design and construction as Diablo Canyon Units 1 and 2 [4]. The results from these analyses were used to determine the stresses in the head penetration region for Diablo Canyon Units 1 and 2. The analyses considered the pressure loads associated with steady state operation, as well as the residual stresses that are produced by the fabrication process.

A number of rows of penetrations, including those nearest the head flange, which is the region where cracking has been discovered in other non-B&W design plants, were analyzed using the finite element analysis method. In addition, several other rows of penetrations and the center CRDM penetrations were analyzed to provide additional results, so a trend can be established as a function of radial location. The head vent nozzle was also analyzed. The calculated stresses as well as field-measured deformation have been found to be more severe at the outermost location. The stress analysis will be used to provide input directly to the crack growth analysis.

The stress analysis provides the key input to the flaw tolerance evaluation, which is described below.

3.2 FLAW TOLERANCE APPROACH

A flaw tolerance approach has been developed to allow continued safe operation until an appropriate time for repair, or the end of plant life. The approach is based on the prediction of future growth of detected flaws, to ensure that such flaws would remain stable.

If an indication is discovered during in-service inspection, its size can be compared with the flaw size considered as allowable for continued service. This "allowable" flaw size is determined from the actual loading (including mechanical and residual loads) on the head penetration for Diablo Canyon Units 1 and 2. Acceptance criteria are discussed in Section 6.5.

The time for the observed crack to reach the allowable crack size determines the length of time the plant can remain online before repair, if required. For the crack growth calculation, a best estimate is needed and no additional margins are necessary.

The results of the evaluation are presented in terms of simple flaw tolerance charts. The charts graphically show the time required to reach the allowable length or depth, which represents additional service life before repair. This result is a function of the loading on the particular head penetration as well as the circumferential location of the crack in the penetration nozzle.

Schematic drawings of the head penetration flaw tolerance charts are presented as Figure 3-1. This type of chart can be used to provide estimates of the remaining service life before a leak would develop from an observed crack. For example, if a part-through flaw was discovered, the user would refer to Figure 3-1, to determine the time (t_p) which would be remaining before the crack would penetrate the wall or reach the allowable depth (t_a) (e.g. $a/t = 0.75$).

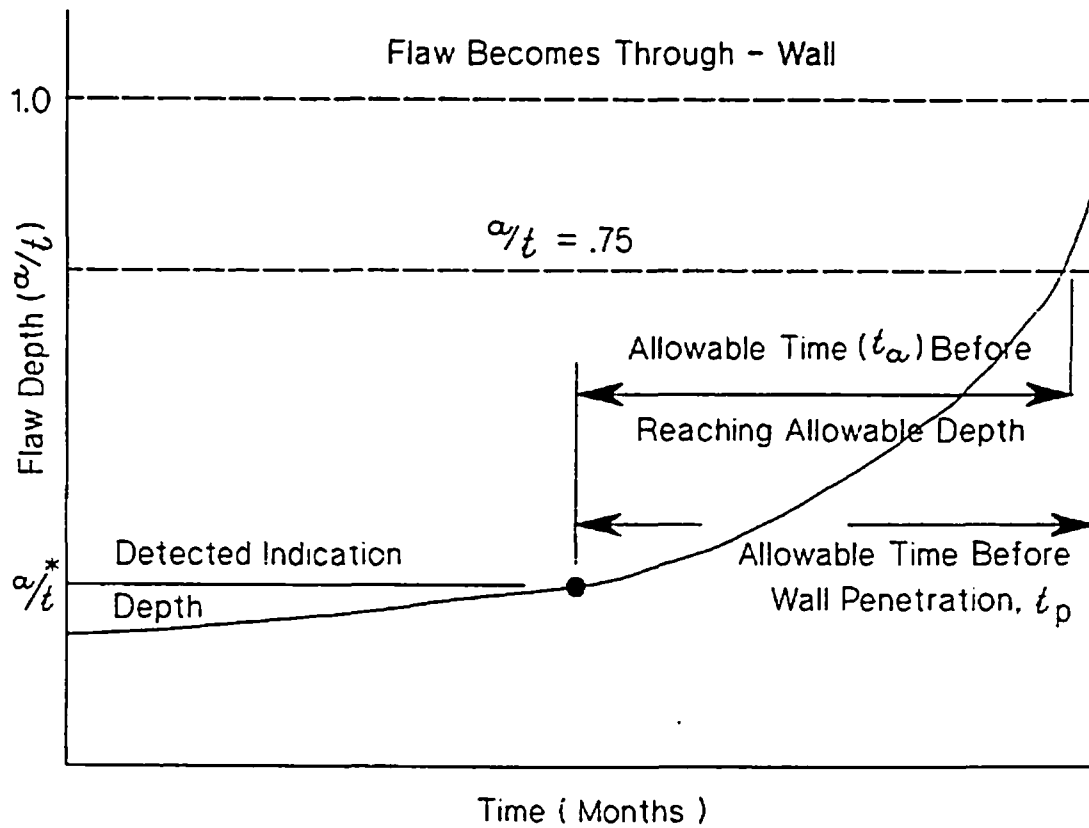


Figure 3-1 Schematic of a Head Penetration Flaw Growth Chart for Part-Through Flaws

4 MATERIAL PROPERTIES, FABRICATION HISTORY AND CRACK GROWTH PREDICTION

4.1 MATERIALS AND FABRICATION

The reactor vessels for Diablo Canyon Units 1 and 2 were manufactured from material produced by Huntington Alloys USA. The carbon content and mechanical properties of the Alloy 600 material used to fabricate the Diablo Canyon Units 1 and 2 vessels are provided in Tables 4-1 and 4-2 [5]. The materials were annealed for 1.5 hours at a temperature of 1725°F and air cooled. Figures 4-1 and 4-2 illustrate the yield strengths and carbon content, based on percent of heats, of the head adapter penetrations in the Diablo Canyon Units 1 and 2 vessels relative to a sample of the French head penetrations which have experienced cracking. The general trend for the head adapter penetrations in Diablo Canyon Units 1 and 2 are of a higher carbon content, higher mill annealing temperature and lower yield strength relative to those on the French vessels. These factors should all have a beneficial effect on the material resistance to PWSCC in the head penetrations.

4.2 CRACK GROWTH PREDICTION

The cracks in the penetration region have been determined to result from primary water stress corrosion cracking in the Alloy 600 base metal and, in some cases, the Alloy 182 weld metal. There are a number of available measurements of static load crack growth rates in primary water environment, and in this section the available results will be compared and a representative growth rate established.

Direct measurements of Stress Corrosion Cracking (SCC) growth rates in Alloy 600 are relatively rare. Also, care should be used when interpreting the results because the materials may be excessively cold worked, or the loading applied may be near or exceeding the limit load of the penetration nozzle, meaning there will be an interaction between tearing and crack growth. In these cases the crack growth rates may not be representative of service conditions.

The effort to develop a reliable crack growth rate model for Alloy 600 began in the spring of 1992, when the Westinghouse Owners Group began to develop a safety case to support continued operation of plants. At the time, there was no available crack growth rate data for head penetration materials, and only a few publications existed on growth rates of Alloy 600 in any product form.

The best available publication at that time was that of Peter Scott of Framatome, who had developed a growth rate model for PWR steam generator materials [6]. His model was based on a study of results obtained by McIlree, Rebak and Smialowska [7] who had tested short steam generator tubes which had been flattened into thin compact specimens.

An equation was fitted to the data of reference [7] for the results obtained in water chemistries that fell within the standard specification for PWR primary water. Results for chemistries outside the specification were not used. The following equation was fitted to the data at 330°C (626°F):

$$\frac{da}{dt} = 2.8 \times 10^{-11} (K - 9)^{1.16} \text{ m/sec} \quad (4-1)$$

where:

K is in MPa $\sqrt{\text{m}}$

The next step was to correct these results for the effects of cold work. Based on work by Cassagne and Gelpi [8], Scott concluded that dividing the above equation by a factor of 10 would be appropriate for noncold-worked material. The crack growth law for 330°C (626°F) then becomes:

$$\frac{da}{dt} = 2.8 \times 10^{-12} (K - 9)^{1.16} \text{ m/sec} \quad (4-2)$$

Scott further corrected this law for the effects of temperature. This forms the basis for the PWR Materials Reliability Program (MRP) recommended crack growth rate (CGR) curve for the evaluation of SCC where a power-law dependence on stress intensity factor was assumed [9A]. The MRP recommended CGR curve was used in this report for determining the primary water stress corrosion crack growth rate and a brief discussion on this recommended curve is as follows:

The EPRI-MRP crack growth review team, an international panel of experts in the area of SCC crack growth, provided input to the MRP in its development of the recommended CGR curve. This group met to review the available worldwide data on October 2-4, 2001, in Airlie, Virginia. The PWR Materials Reliability Program (MRP) has developed a recommended crack growth rate (CGR) curve for primary water stress corrosion cracking (PWSCC) of Alloy 600 materials. [

J^{a,c,v}

[

 $J^{a,c,e}$

There is a general agreement that crack growth in Alloy 600 materials in the primary water environment can be modeled using a power-law dependence on stress intensity factor with differences in temperature accounted for by an activation energy (Arrhenius) model for thermally controlled processes. Figure 4-3 shows the recommended CGR curve along with the laboratory data from Huntington materials used to develop the curve.

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 $J^{a,c,e}$

[

] ^{a.c.e}

The MRP crack growth curve was structured to bound 75 percent of the 26 heats for which test results were available. Fits were done on the results for each heat, and the constant term was determined for each heat. This was done to eliminate the concern that the curve might be biased from a large number of results from a single heat. The 75th percentile was then determined from these results. The MRP expert panel on crack growth endorsed the resulting curve unanimously in a meeting on March 6th and 7th 2002. This approach is consistent with the Section XI flaw evaluation philosophy, which is to make a best estimate prediction of future growth of a flaw. Margins are incorporated in the allowable flaw sizes. The entire data set is shown in Figure 4-3, where the data have been adjusted to a single temperature of 325°C.

The applicability of the MRP recommended model to head penetrations was recently confirmed by two independent approaches. The first was a collection of all available data from Standard Steel and Huntington Alloys materials tested over the past ten years [9A]. The results are shown in Figure 4-3, along with the Scott model for the test temperature.

A second independent set of data were used to validate the model, and these data were obtained from the two inspections carried out on penetration no. 75 of D. C. Cook Unit 2, which was first found to be cracked in 1994 [9M]. The plant operated for one fuel cycle before the penetration was repaired in 1996 and the flaw was measured again before being repaired. These results were used to estimate the PWSCC growth rate for both the length of the flaw and its depth. These two points are also shown in Figure 4-4, and are consistent with the laboratory data for Huntington materials. In fact, Figure 4-4 demonstrates that the MRP model is nearly an upper bound for these materials. The D. C. Cook Unit 2 penetrations were made from Huntington materials.

As documented in MRP-48 report [10], Diablo Canyon Units 1 and 2 operate at a temperature of 309°C (589°F) and 312°C (593°F) in the head region respectively. A temperature adjustment on the crack growth rate is necessary since the crack growth rate is strongly affected by temperature. An enveloping temperature of 312°C (593°F) is used to determine the temperature adjustment for both units. The temperature correction was obtained from study of both laboratory and field data for stress corrosion crack growth rates for Alloy 600 in primary water environments. The available data showing the effect of temperature are summarized in Figure 4-5. Most of the

results shown here are from steam generator tube materials, with several sets of data from operating plants, and results from two heats of materials tested in a laboratory [9B].

Study of the data shown in Figure 4-5 results in an activation energy of 31-33 Kcal/mole, which can then be used to adjust for the lower operating temperature. This value is slightly lower than the generally accepted activation energy of 44-50 Kcal/mole used to characterize the effect of temperature on crack initiation, but the trend of the actual data for many different sources is unmistakable.

[

^{a,c,e} Therefore the following crack growth rate model was used in the crack growth calculation for both Diablo Canyon Units 1 and 2 head penetrations .

$$\frac{da}{dt} = 1.47 \times 10^{-12} (K - 9)^{1.16} \text{ m/sec}$$

where:

K = applied stress intensity factor, in $\text{MPa}\sqrt{\text{m}}$

This equation implies a threshold for cracking susceptibility, $K_{\text{ISCC}} = 9 \text{ MPa}\sqrt{\text{m}}$. The crack growth rate is applicable to propagation in both axial and circumferential directions.

Table 4-1 **Diablo Canyon Unit 1 R/V Head Adapter Material Information [5]**

[illegible]

Table 4-2 **Diablo Canyon Unit 2 R/V Head Adapter Material Information [5]**

[illegible]

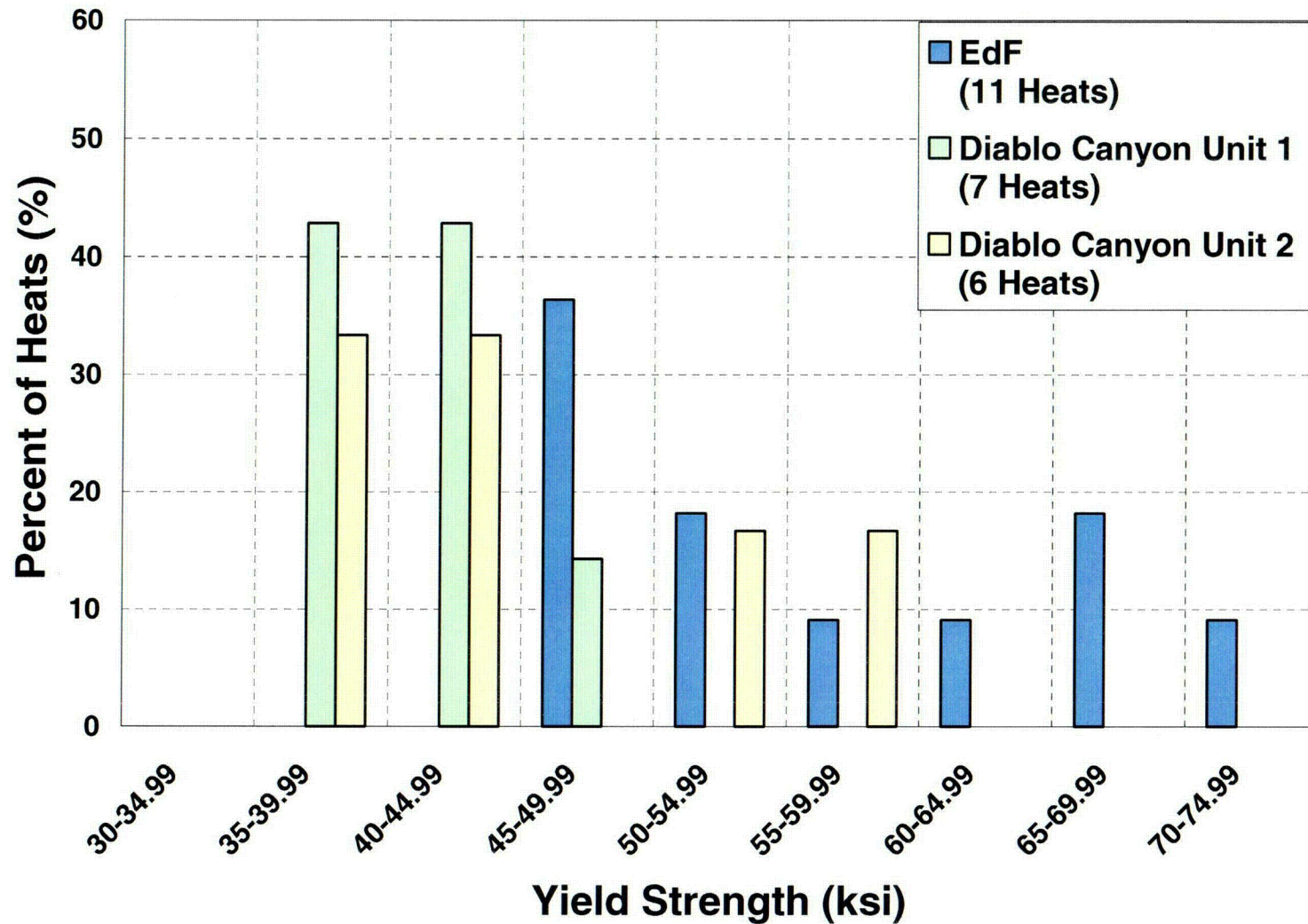


Figure 4-1 Yield Strength of the Various Heats of Alloy 600 Used in Fabricating the Diablo Canyon Units 1 and 2 and French Head Penetrations

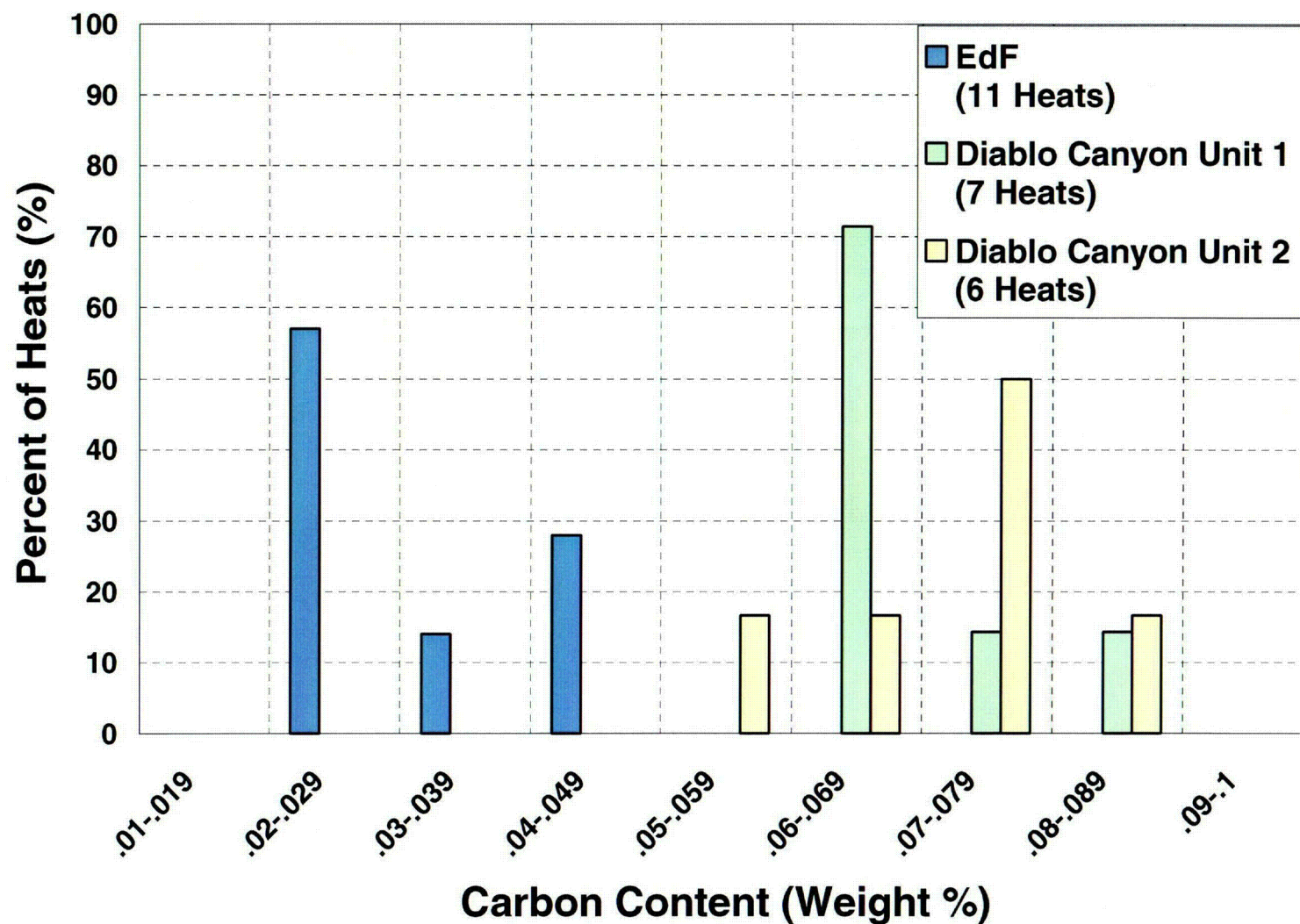


Figure 4-2 Carbon Content of the Various Heats of Alloy 600 Used in Fabricating the Diablo Canyon Units 1 and 2 and French Head Penetration



Figure 4-3 Screened Laboratory Data for Alloy 600 with the MRP Recommended Curve
(Note that the Modified Scott Model is also Shown)

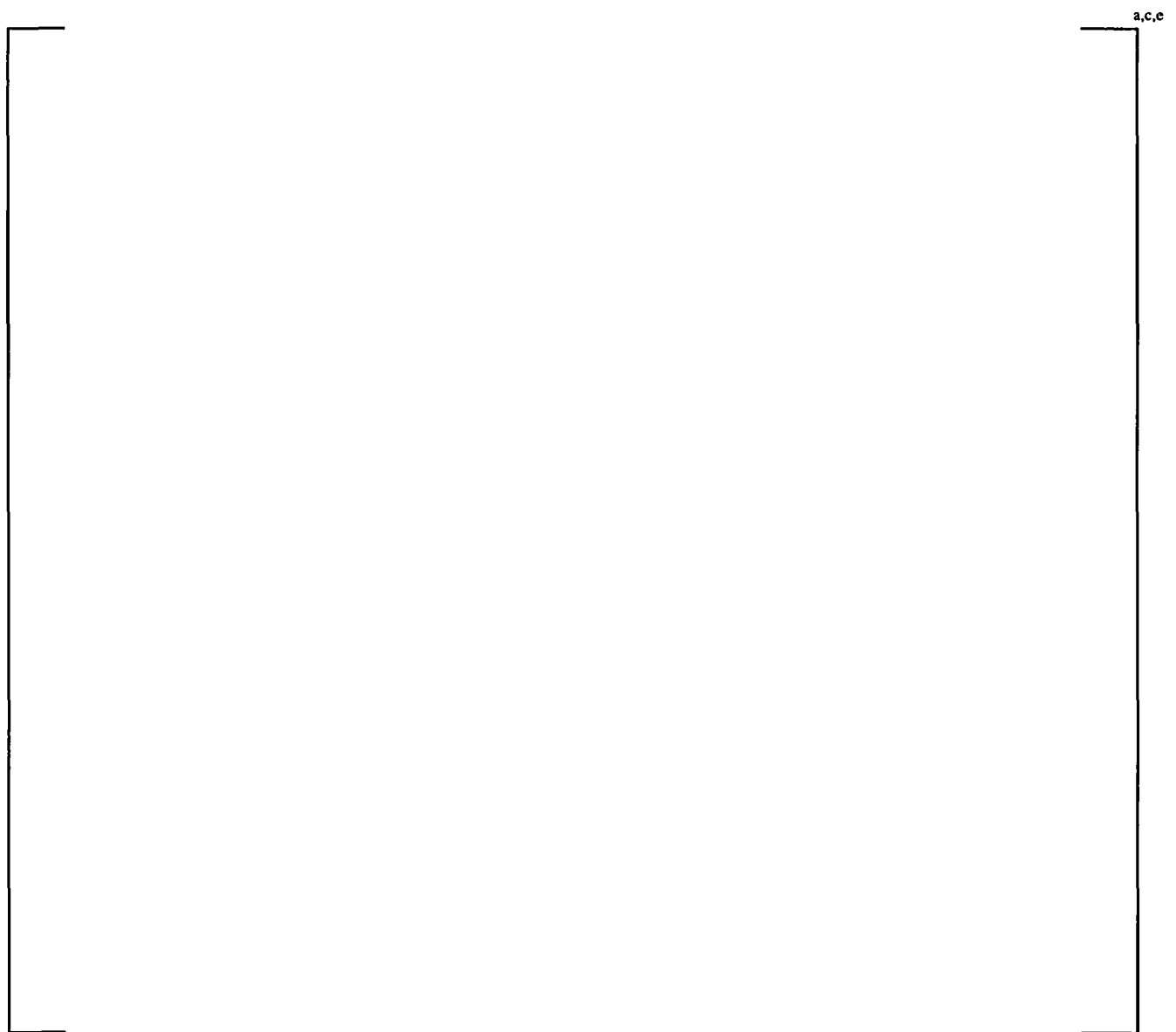
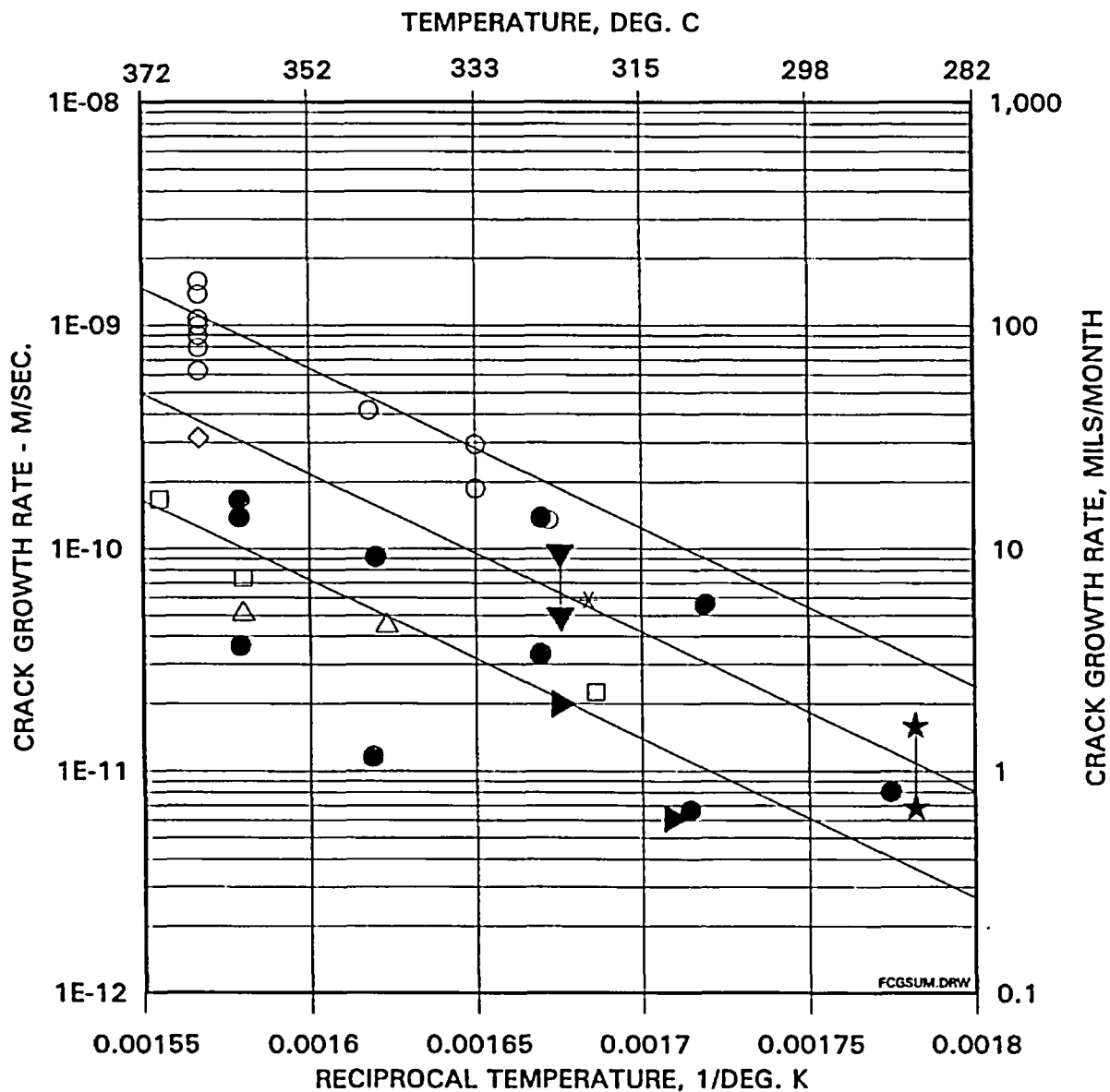


Figure 4-4 Model for PWSCC Growth Rates in Alloy 600 in Primary Water Environments (325°C), With Supporting Data from Standard Steel, Huntington, and Sandvik Materials

Note that the data have been normalized to a temperature of 325°C. The actual test temperatures are listed in parenthesis after the caption. For example, the Huntington data were obtained at temperature ranging from 315°C to 331°C.



Note: All symbols are for steam generator materials, except the solid circles, which are head penetration laboratory data.

Figure 4-5 Summary of Temperature Effects on PWSCC Growth Rates for Alloy 600 in Primary Water

5 STRESS ANALYSIS

5.1 OBJECTIVES OF THE ANALYSIS

The objective of this analysis was to obtain accurate stresses in each CRDM or head vent and its immediate vicinity. To do so requires a three dimensional analysis which considers all the pertinent loadings on the penetration [4]. The stress analyses were performed for a plant of similar design and construction as Diablo Canyon Units 1 and 2. By comparing parameters such as the geometry for the vessel head, CRDM nozzles, head vent, the vessel head temperature, and the arrangements of the penetration nozzles, it is concluded that the stress analysis results from the reference plant are applicable to Diablo Canyon Units 1 and 2. An investigation of deformations at the lower end of the housing was also performed using the model. Five CRDM locations were considered: 0 degree (penetration no. 1 in Units 1 and 2), 26.2 degrees (penetration nos. 30 through 37 in Unit 1; penetration nos. 22 through 29 in Unit 2), 44.3 degrees (penetration nos. 70 through 73 in Unit 1; penetration nos. 62 through 65 in Unit 2), 45.4 degrees (penetration nos. 66 through 73 in Unit 2 only), and 48.7 degrees (penetration nos. 74 through 79 in Unit 1; penetration nos. 74 through 78 in Unit 2).

The analyses were used to provide information for the flaw tolerance evaluation, which follows in Section 6. Also, the results of the stress analysis were compared to the findings from service experience, to help assess the causes of the cracking which has been observed.

5.2 MODEL

A three-dimensional finite element model comprised of isoparametric brick and wedge elements was used to obtain the stresses and deflections. Views of CRDM and head vent nozzle models are shown in Figures 5-1 and 5-2 respectively. Taking advantage of the symmetry of the vessel head, only half of the CRDM penetrations were modeled. Similarly, only half of the center penetration was modeled.

In the models, the lower portion of the Control Rod Drive Mechanism (CRDM) penetration nozzle, the head vent, the adjacent section of the vessel closure head, and the joining weld were modeled. The vessel to penetration nozzle weld was simulated with two weld passes, while four weld passes were used for the head vent nozzle. The penetration nozzle, weld metal, cladding and the vessel head shell were modeled in accordance with the relevant materials.

The only loads used in the analysis are the steady state operating loads. External loads, such as seismic loads, have been studied and have no impact since the penetration nozzles are captured by the full thickness of the reactor vessel head into which the penetrations are shrunk fit during construction. In addition, the duration of the seismic loading is very short and will not have any significant impact on the overall primary stress corrosion crack (PWSCC) growth. The area of interest is in the penetration near the attachment weld, which is unaffected by these external loads.

5.3 STRESS ANALYSIS RESULTS – OUTERMOST CRDM PENETRATION (48.7°)

Figure 5-3 presents the hoop and axial stresses for the steady state condition for the outermost CRDM penetration.

The hoop stresses for steady state operation are much greater than the axial stresses. This is consistent with the field findings, where the cracks discovered are generally oriented axially. Typically, in-service cracks will orient themselves perpendicular to the largest stress component. Also it should be noted from Figure 5-3 that the highest tensile hoop stresses are at the uphill side and downhill side locations rather than midway around the penetration, where they are compressive. This is consistent with finding the axial cracks only at the uphill side and downhill side locations. It is these steady state stresses that will be used to predict crack extension in the penetrations, as will be discussed further in Section 6.

These stress findings also support the safety argument that cracks are unlikely to propagate in the circumferential direction, because the axial stresses are relatively low. This is illustrated in a cut taken along the plane of the top of the attachment weld, as shown in Figure 5-9. Note the area of compressive axial stress near mid-wall of the penetration, which extends for nearly the entire circumference.

5.4 STRESS ANALYSIS RESULTS – INTERMEDIATE CRDM PENETRATIONS

The stresses in these penetrations are similar in character. Figures 5-4, 5-5, and 5-6 show the results for the 45.4 degree, 44.3 degree, and 26.2 degree CRDM penetrations respectively. As with the outermost housing, the hoop stresses for steady state operation are greater than the axial stresses.

5.5 STRESS ANALYSIS RESULTS – CENTER CRDM PENETRATION

Figure 5-7 shows the hoop and axial stresses at steady state for the center CRDM penetration. The tube hoop stresses near the weld are generally lower than the tube hoop stresses at the downhill side or uphill side locations of the outer head penetration.

5.6 STRESS ANALYSIS RESULTS – HEAD VENT

The head vent nozzle is a smaller penetration than the CRDM head penetration, but is also constructed of Alloy 600 material, with a partial penetration weld at the inside of the reactor vessel head. The head vent was evaluated using a three-dimensional finite element model as shown in Figure 5-2.

The critical stress location in the head vent is in the vicinity of the attachment weld, where residual and pressure stresses have the most impact. As with the CRDM penetrations, the residual stresses dominate. Also similar to the CRDM head penetrations, the stresses in the pipe decrease quickly as a function of distance up the pipe away from the weld. The hoop and axial stresses are shown as contours in Figure 5-8.

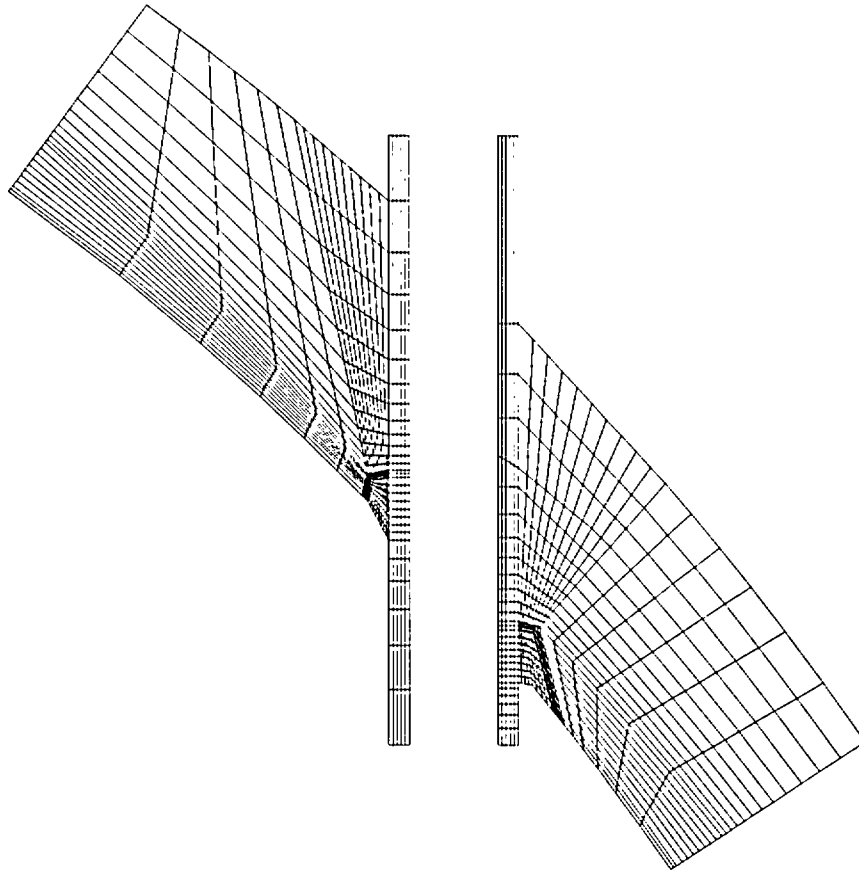


Figure 5-1 Finite Element Model of CRDM Penetration

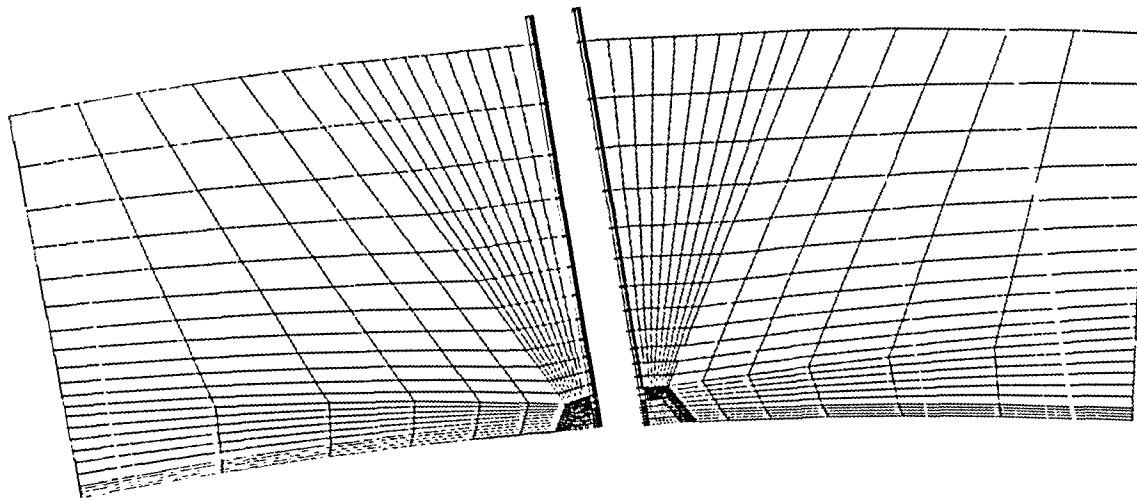


Figure 5-2 Vent Pipe Finite Element Model

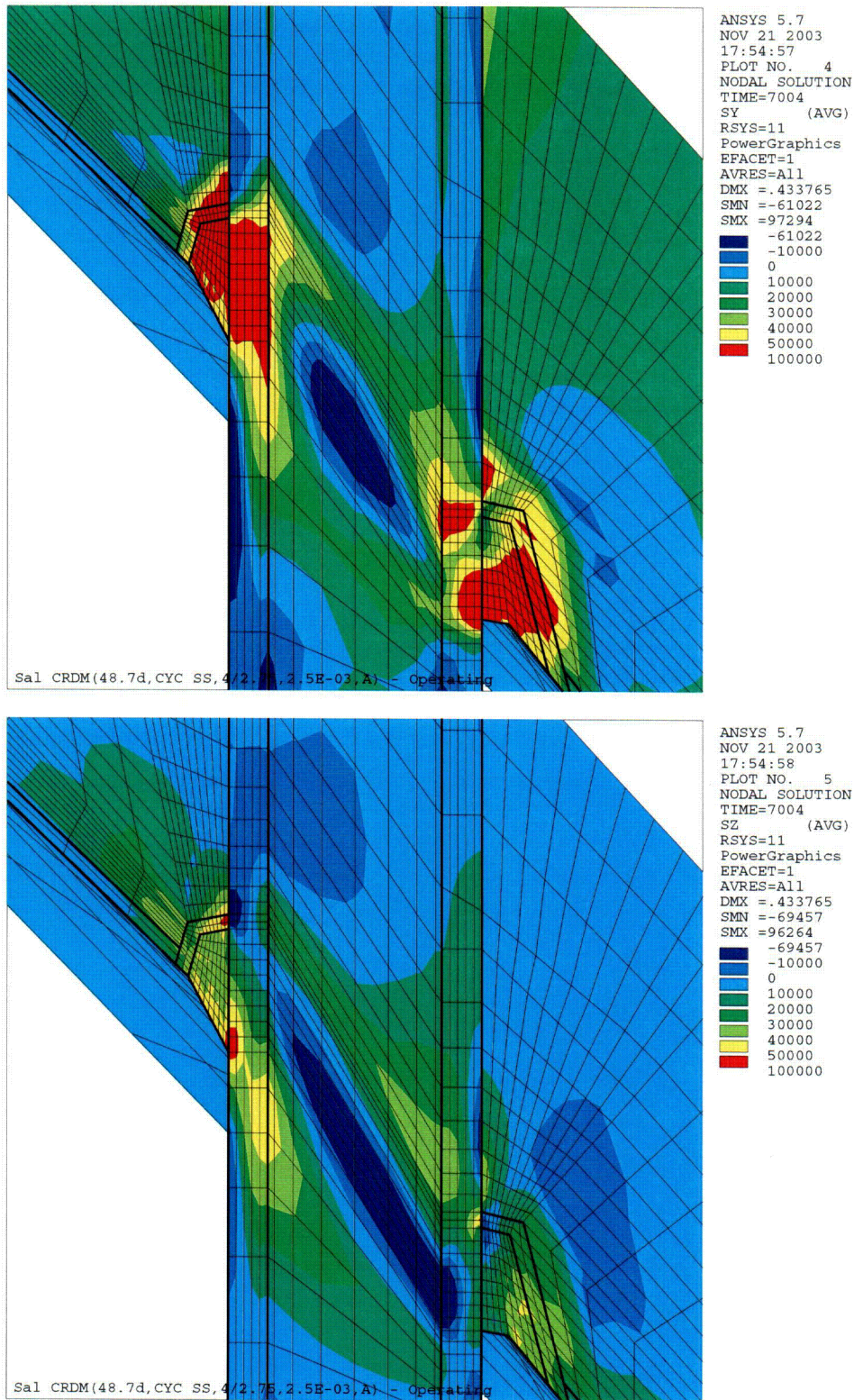


Figure 5-3 Stress Distribution at Steady State Conditions: Outermost CRDM Penetration Nozzle (48.7 Degrees) (Hoop Stress is the Top Figure, Axial Stress is the Bottom Figure)

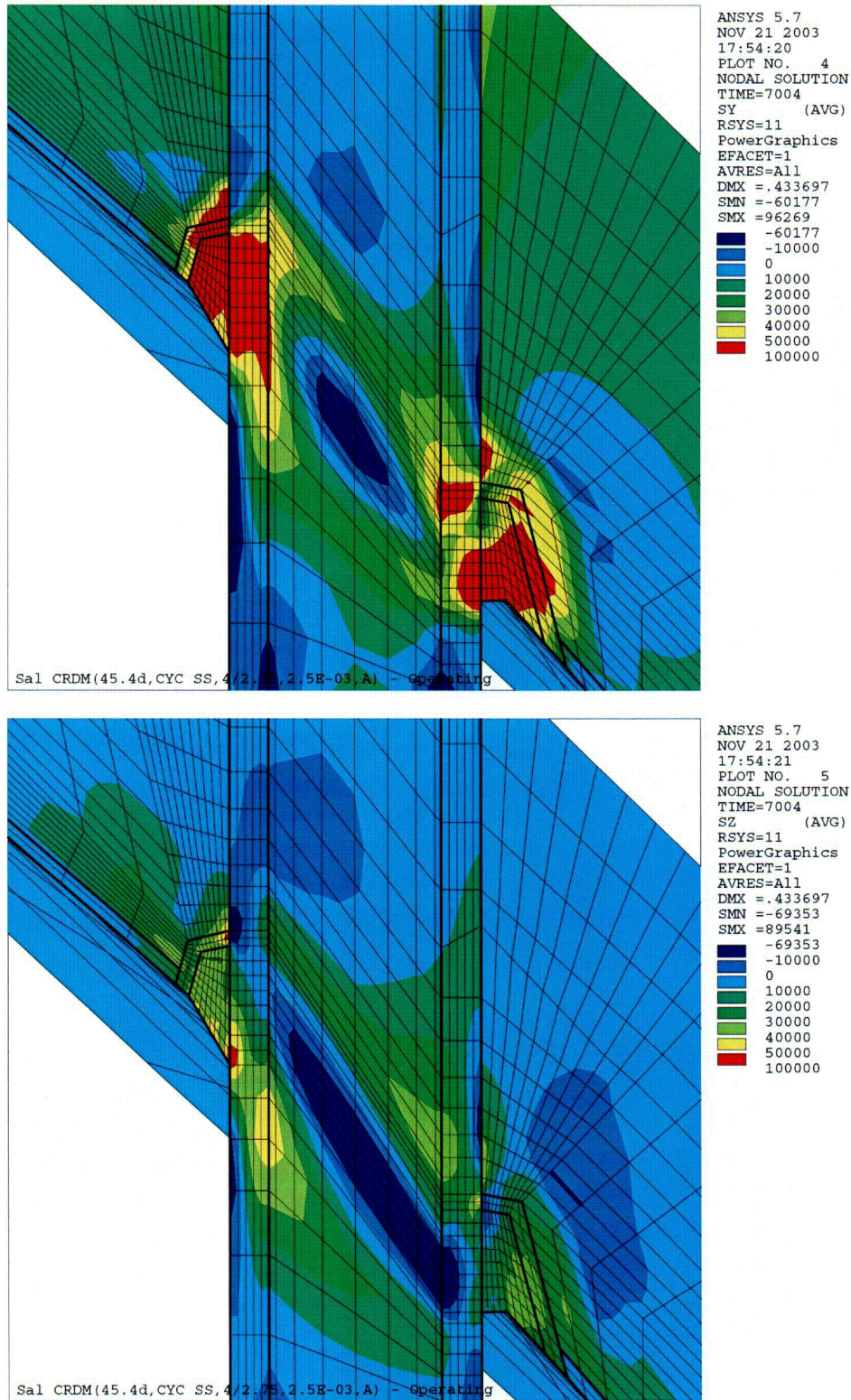


Figure 5-4 Stress Distribution at Steady State Conditions for the 45.4 Degrees CRDM Penetration (Hoop Stress is the Top Figure; Axial Stress is the Bottom Figure)

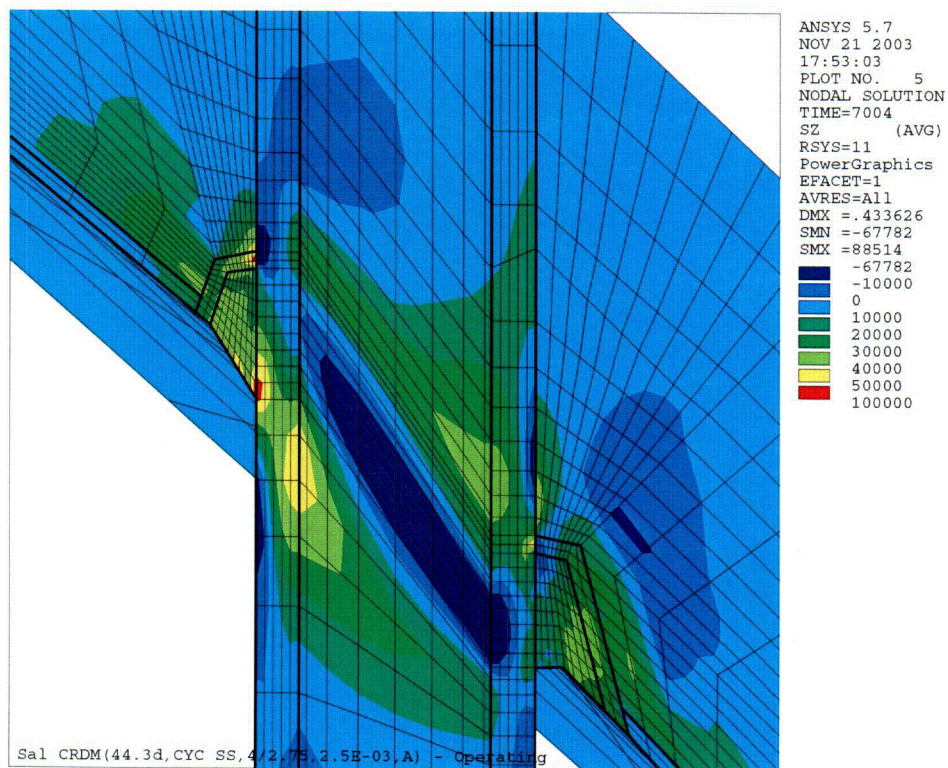
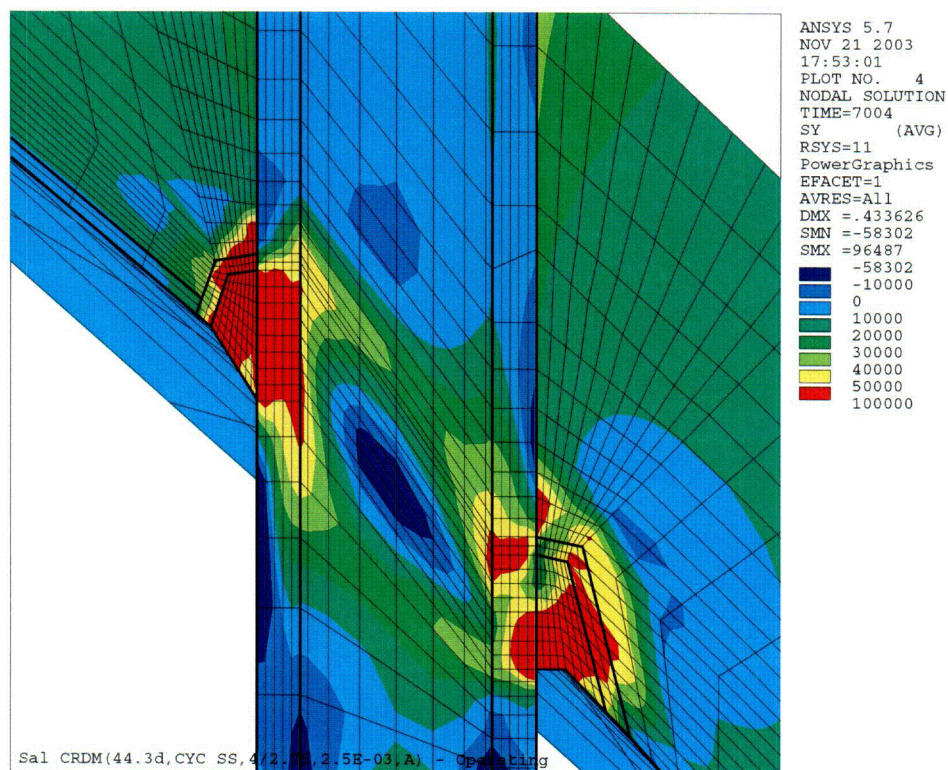


Figure 5-5 Stress Distribution at Steady State Conditions for the 44.3 Degrees CRDM Penetration (Hoop Stress is the Top Figure; Axial Stress is the Bottom Figure)

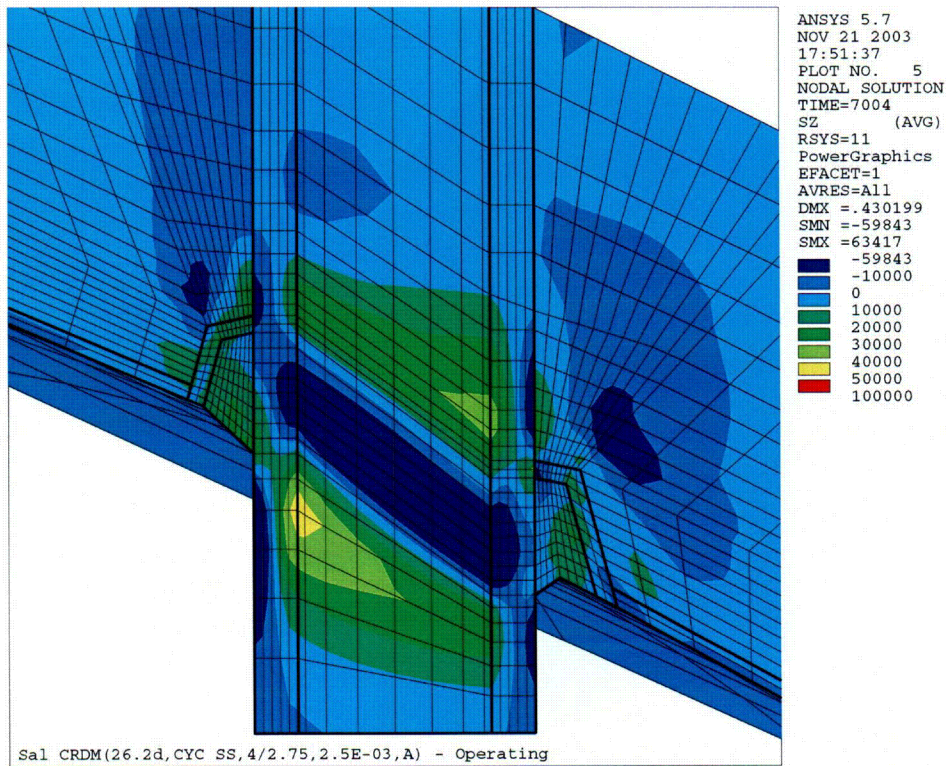
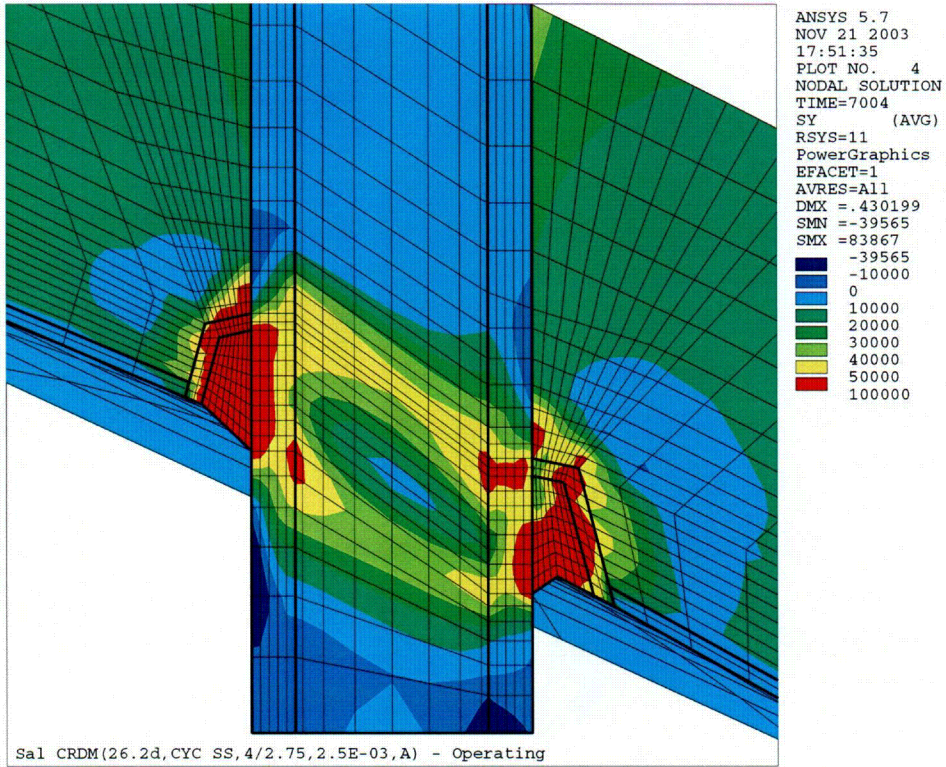


Figure 5-6 Stress Distribution at Steady State Conditions for the 26.2 Degree CRDM Penetration (Hoop Stress is the Top Figure; Axial Stress is the Bottom Figure)

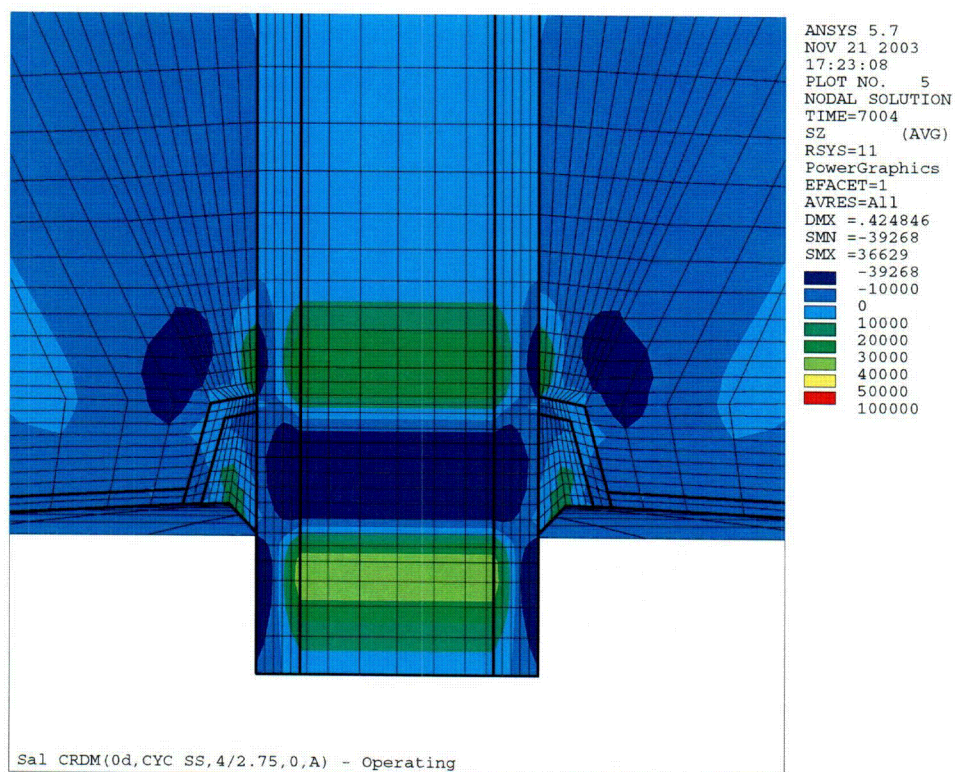
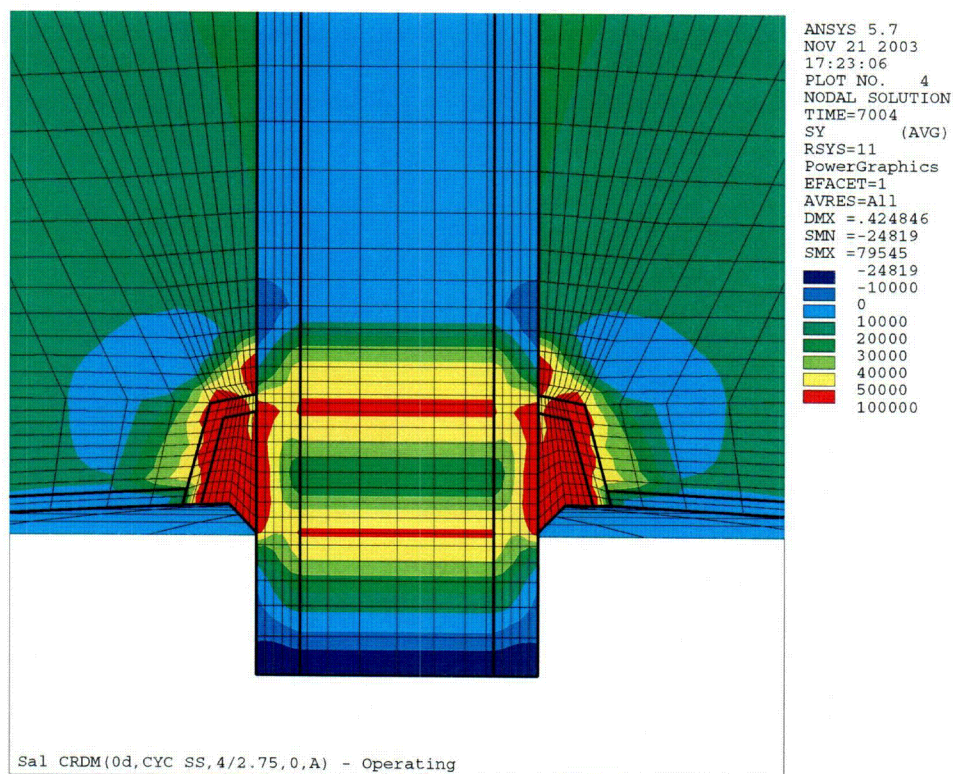


Figure 5-7 Stress Distribution at Steady State Conditions for the Center CRDM Penetration (Hoop Stress is the Top Figure; Axial Stress is the Bottom Figure)

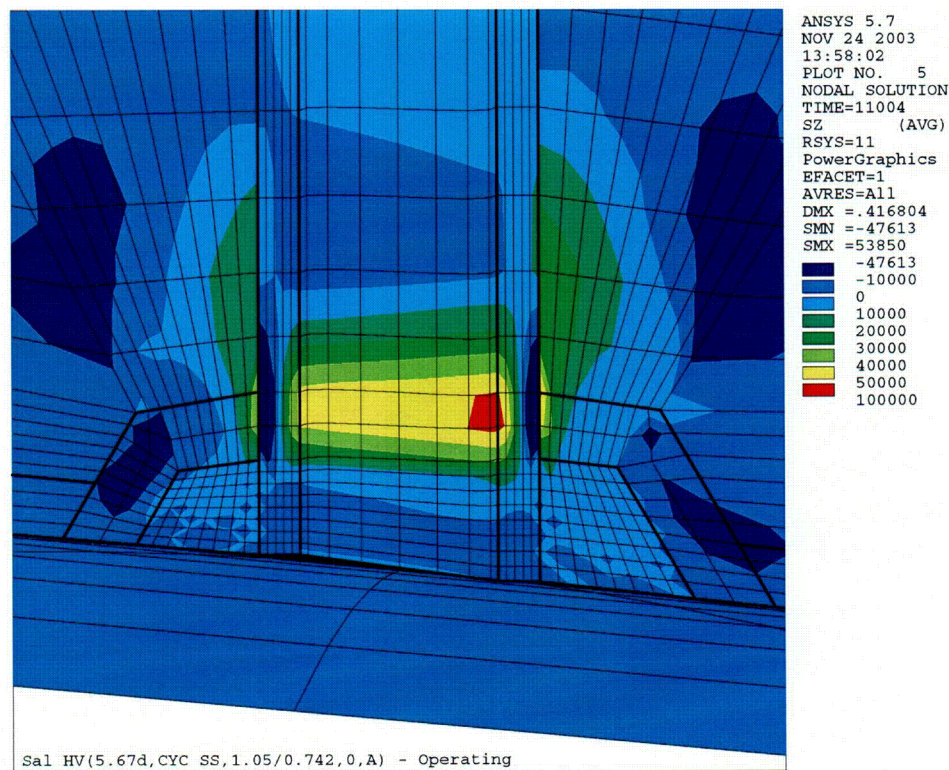
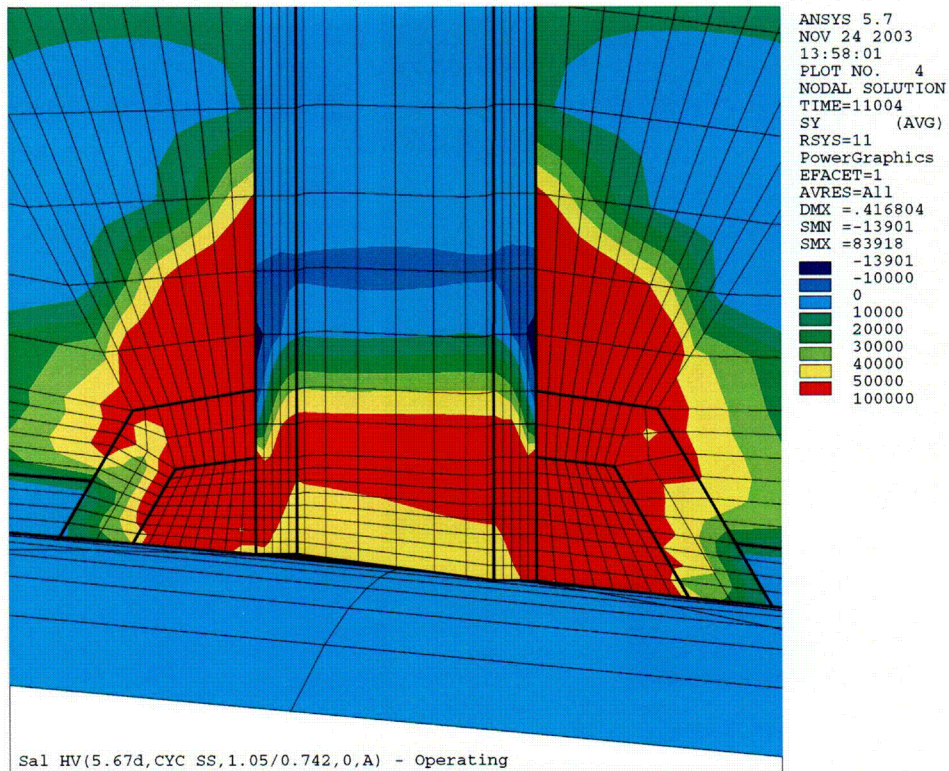


Figure 5-8 Stress Contours in the Head Vent Nozzle as a Result of Residual Stresses and Operating Pressure (Hoop Stress is the Top Figure; Axial Stress is the Bottom Figure)

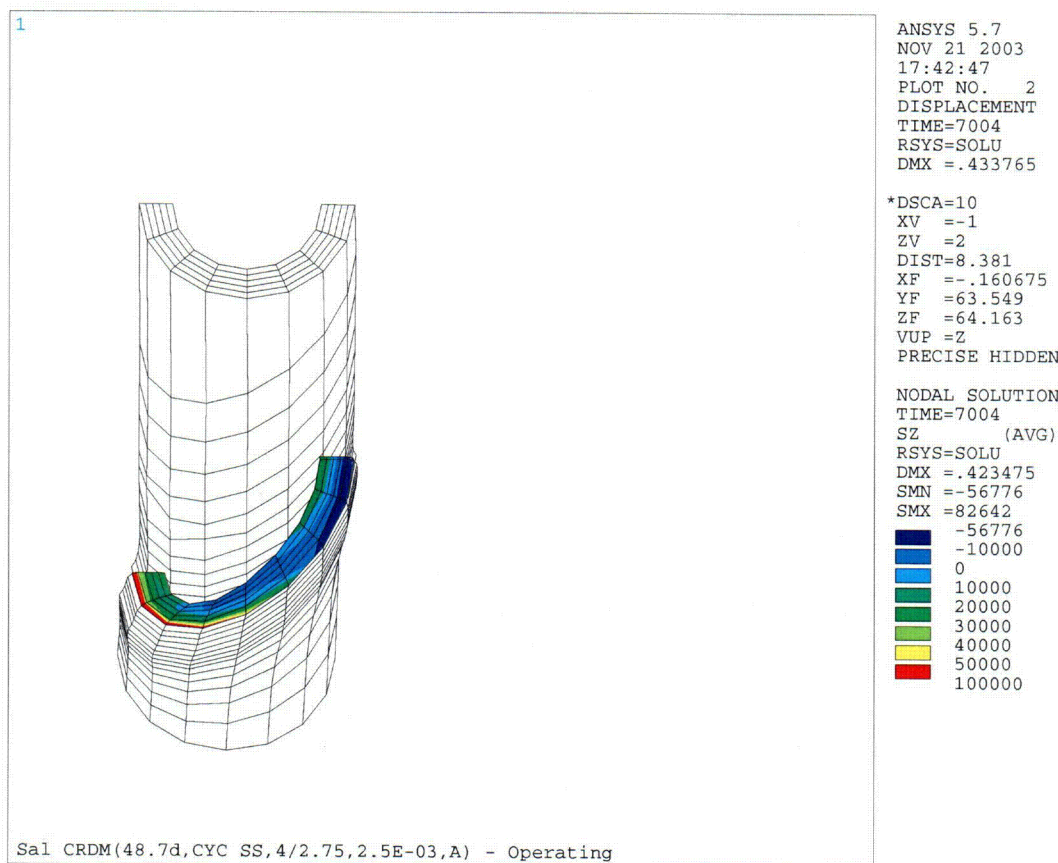


Figure 5-9 Axial Stress Distribution at Steady State Conditions for the Outermost CRDM Penetration (48.7 Degrees), Along a Plane Oriented Parallel to, and Just Above, the Attachment Weld

6 FLAW TOLERANCE CHARTS

6.1 INTRODUCTION

The flaw tolerance charts were developed using the stress analysis of each of the penetration locations as discussed in Section 5. The crack growth law developed for Diablo Canyon Units 1 and 2 in Section 4.2 was used for each case, and several flaw tolerance charts were developed for each penetration location. The first series of charts characterizes the growth of a part through flaw and is used in predicting remaining service life of the penetration nozzle. The second series of charts, which characterizes the growth of a through-wall flaw below the J-groove weld, can be used to determine the minimum required inspection coverage to ensure that any flaws initiated below the weld in the un-inspected region of the penetration nozzle would not reach the bottom of the weld before the next inspection. All times resulting from these calculations are Effective Full Power Years, since crack growth will only occur at operating temperatures.

6.2 OVERALL APPROACH

The results of the three-dimensional stress analysis of the penetration locations were used directly in the flaw tolerance evaluation.

The crack growth evaluation for the part-through flaws was based on the worst stress distribution through the penetration wall at the location of interest of the penetration. The highest stressed location was found to be in the immediate vicinity of the weld for both the center and outermost penetrations.

The stress profile was represented by a cubic polynomial:

$$\sigma(x) = A_0 + A_1x + A_2x^2 + A_3x^3 \quad (6-1)$$

where:

- x = the coordinate distance into the nozzle wall
- σ = stress perpendicular to the plane of the crack
- A_i = coefficients of the cubic polynomial fit

For the surface flaw with length six times its depth, the stress intensity factor expression of Raju and Newman [11A] was used. The stress intensity factor $K_I(\Phi)$ can be calculated anywhere along the crack front. The point of maximum crack depth is represented by $\Phi = 0$, and this location was also found to be the point of maximum K_I for the cases considered here. The following expression is used for calculating $K_I(\Phi)$, where Φ is the angular location around the crack. The units of $K_I(\Phi)$ are $\text{ksi}\sqrt{\text{in}}$.

$$K_I(\Phi) = \left[\frac{\pi a}{Q} \right]^{0.5} \sum_{j=0}^3 G_j(a/c, a/t, t/R, \Phi) A_j a^j \quad (6-2)$$

The boundary correction factors $G_0(\Phi)$, $G_1(\Phi)$, $G_2(\Phi)$ and $G_3(\Phi)$ are obtained by the procedure outlined in reference [11A]. The dimension "a" is the crack depth, and "c" is the semi crack length, while "t" is the wall thickness. "R" is the inside radius of the tube, and "Q" is the shape factor.

[

] ^{a,c,e}

For the prediction of crack growth for a circumferential through-wall flaw in the head penetration along a plane above the attachment weld, an expression first presented by Hiser [11C] was used. The stress intensity factor for a through-wall flaw was developed using finite element modeling by Structural Integrity Associates (SIA), and these results were merged with results obtained by Richard Bass of Oak Ridge National Labs (ORNL), as shown in Figure 6-1. The equation of the stress intensity factor is simply a function of the crack half angle, and is given below:

$$K_I = 3.476x - 6.619 \times 10^{-2} x^2 + 4.733 \times 10^{-4} x^3 - 1.445 \times 10^{-6} x^4 + 1.790 \times 10^{-9} x^5 \quad (6-4)$$

In this equation, x is the crack half angle in degrees and K_I is in $\text{ksi}\sqrt{\text{in}}$.

[

] ^{a,c,e}

6.3 AXIAL FLAW PROPAGATION

CRDM Surface Flaws

The results of the calculated growth for inside surface flaws growing through the wall thickness of the CRDM penetration nozzles are shown in Figures 6-2 through 6-7 for inside surface flaws. For outside surface flaws, the results are shown in Figures 6-9 and 6-10. Based on the discussion in MRP-55 report [9A], the use of stress intensity factors less than $15 \text{ MPa}\sqrt{\text{m}}$ involves assumption not currently substantiated by actual CGR data for CRDM nozzle materials. Therefore, these crack growth curves begin at a flaw depth that result in a stress intensity factor of $15 \text{ MPa}\sqrt{\text{m}}$, which exceeds the threshold value of $9 \text{ MPa}\sqrt{\text{m}}$. This may result in curves with different initial flaw sizes, as seen for example in Figure 6-3. Note that results are only provided for the uphill and downhill sides of each penetration nozzle. The stresses for the regions 90 degrees from these locations are in general compressive. If flaws are found in such a location, the results for either the uphill or downhill location, whichever is closer, can be conservatively used.

Each of these figures allows the future allowable service time to be estimated graphically, as discussed in Section 3. Results are shown for each of the penetration nozzles analyzed in each of these figures. The stresses are much higher near the attachment weld than at 0.5 inch below or above it, so separate figures have been provided for these three regions. For more than 0.5 inch below the weld, the crack growth will eventually come to rest since the stresses are compressive as shown in the hoop stress plots for the CRDM nozzles in Appendix A. Also, the stresses are different on the downhill side of the penetration as opposed to the uphill side, so these two cross sections have also been treated separately.

Example problems are provided in section 7 for a range of possible flaw types.

Inspection Coverage of RPV Head Penetration Below the Weld

As a result of the First Revised NRC Order EA-03-009 issued on February 2004, most of the power plants in the United States have encountered problems with the required inspection coverage of the head penetrations below the weld. To support the submittal of relaxation request in the event that the required inspection coverage below the weld cannot be achieved, a series of axial through-wall crack growth below the weld charts for the downhill side were prepared for each of the penetrations evaluated. The charts are shown in Figures 6-12 through 6-16.

There is nearly universal agreement that high stresses, on the order of the material yield strength, are necessary to initiate Primary Water Stress Corrosion Cracking (PWSCC). There is no known case of stress corrosion cracking of Alloy 600 below the yield stress [13]. Typical yield strengths for wrought Alloy 600 head penetration nozzles are in the range of 37 ksi to 65 ksi. Weld metal yield strengths are generally higher. The yield strength of the head penetration nozzles for Diablo Canyon Units 1 and 2 varies from 35 ksi to 57.5 ksi [5]. In addition, the stress level of 20 ksi has been determined as a value below which PWSCC initiation is extremely unlikely [13].

In each of the figures, the location of the upper extremity of the postulated through-wall crack is identified on the charts by the distance measured from the bottom of weld. Although the assumption of any PWSCC crack initiation in the region of the penetration nozzle with a stress

level less than 20 ksi is very conservative, nevertheless, the lower extremity of the initial through-wall flaw is conservatively postulated to be located on the penetration nozzle where either the inside or the outside surface hoop stress drops below 0 ksi. The time duration required for the upper extremity of an axial through-wall flaw to reach the bottom of the weld can be determined from these charts as illustrated in Example 5 of section 7.

Head Vent

The flaw tolerance chart that is necessary for the head vent region is for flaws at and above the weld since there is no portions of the head vent which projects below the weld. Figure 6-8 provides the projected growth of a part through flaw in the head vent just above the attachment weld. The growth through the wall is relatively rapid, because the thickness of the head vent is small.

6.4 CIRCUMFERENTIAL FLAW PROPAGATION

Since circumferentially oriented flaws have been found at five plants (Bugey 3, Oconee 2, Crystal River 3, Davis Besse, and Oconee 3), it is important to consider the possibility of crack extension in the circumferential direction. The first case was discovered as part of the destructive examination of the tube with the most extensive circumferential cracking at Bugey 3. The crack was found to have extended to a depth of 2.25 mm in a wall thickness of 16 mm. The flaw was found at the outside surface of the penetration (number 54) at the downhill side location, just above the weld.

The circumferential flaws in Oconee Unit 3 were discovered during the process of repairing a number of axial flaws, whereas the circumferential flaw in Oconee Unit 2 and Crystal River Unit 3 were discovered by UT. Experience gained from these findings has enabled the development of UT procedures capable of detecting circumferential flaws reliably.

To investigate this issue completely, a series of crack growth calculations were carried out for a postulated surface circumferential flaw located just above the head penetration weld, in a plane parallel to the weld itself. [

] ^{a.c.e}

[

^{a,c,e} The results of this calculation are shown in Figure 6-17. From this figure, it can be seen that the time required for propagation of a circumferential flaw to a point where the integrity of the CRDM penetration nozzle would be affected [^{a,c,e}] would be about 24 years. Due to the conservatism in the calculations, i.e. the time period for a surface flaw to become a through-wall flaw was conservatively ignored, the service life is likely to be even longer. In addition, due to uncertainties in the exact composition of the chemical environment in contact with the nozzle OD, a multiplicative factor of 2.0 is used in the Crack Growth Rate (CGR) for all circumferential surface flaws on the OD of the head penetration nozzles located above the elevation of the J-groove weld.

6.5 FLAW ACCEPTANCE CRITERIA

Now that the projected crack growth curves have been developed, the question remains as to what flaw size would be acceptable for further service.

Acceptance criteria have been developed for indications found during inspection of reactor vessel upper head penetration as part of an industry program coordinated by NEI (formerly NUMARC). Such criteria are normally found in Section XI of the ASME Code, but Section XI does not require in-service inspection of these regions and therefore acceptance criteria are not available. In developing the enclosed acceptance criteria, the approach used was very similar to that used by Section XI, in that an industry consensus was reached using input from both operating utility technical staff and each of the three PWR vendors. The criteria developed are applicable to all PWR plant designs.

Since the discovery of the leaks at Oconee and ANO-1, the acceptance criteria have been revised slightly to cover flaws on the outside diameter of the penetration below the attachment weld, and flaws in the attachment weld. These revised criteria are now formally endorsed by the NRC [15], and will be used in these evaluations. Portions of the acceptance criteria will be noted below.

The criteria presented herein are limits on flaw sizes, which are acceptable. The criteria are to be applied to inspection results. It should be noted that determination of the future service during

which the criteria are satisfied is plant-specific and dependent on flaw geometry and loading conditions.

It has been previously demonstrated by each of the owners groups that the penetration nozzles are very tolerant of flaws and there is only a small likelihood of flaw extensions to larger sizes. Therefore, it was concluded that complete fracture of the penetration nozzle is highly unlikely. The approach used here is more conservative than that used in Section XI applications where the acceptable flaw size is calculated by placing a margin on the critical flaw size. For the current application, the critical flaw size would be far too large to allow a practical application of the approach used in Section XI applications, so protection against leakage is the priority.

The acceptance criteria presented herein apply to all the flaw types regardless of orientation and shape. Similar to the approach used in Section XI, flaws are first characterized according to established rules and then compared with acceptance criteria.

Flaw Characterization

Flaws detected must be characterized by the flaw length and preferably flaw depth. The proximity rules of Section XI for considering flaws as separate, may be used directly (Section XI, Figure IWA 3400-1). This figure is reproduced here as Figure 6-18.

When a flaw is detected, its projections in both the axial and circumferential directions must be determined. Note that the axial direction is always the same for each penetration, but the circumferential direction will be different depending on the angle of intersection of the penetration nozzle with the vessel head. The "circumferential" direction of interest here is along the top of the attachment weld, as illustrated in Figure 6-19. It is this angle which will change for each penetration nozzle and the top of the attachment weld is also the plane which could cause separation of the penetration nozzle from the vessel head. The location of the flaw relative to both the top and bottom of the partial penetration attachment weld must also be determined since a potential leak path exists when a flaw propagates through the penetration nozzle wall and up the penetration nozzle past the attachment weld. Schematic of a typical weld geometry is shown in Figure 6-20.

Flaw Acceptance Criteria

The maximum allowable depth (a_f) for axial flaws on the inside surface of the penetration nozzle, at or above the weld is 75 percent of the penetration wall thickness. The term a_f is defined as the maximum size to which the detected flaw is calculated to grow in a specified time period. This 75 percent limitation was selected to be consistent with the maximum acceptable flaw depth in Section XI and to provide an additional margin against through wall penetration. There is no concern about separation of the penetration nozzle from the vessel head, unless the flaw is above the attachment weld and oriented circumferentially.

Axial inside surface flaws found below the weld are acceptable regardless of depth as long as their upper extremity does not reach the bottom of the weld during the period of service until the next inspection. Axial flaws that extend above the weld are limited to 75 percent of the wall thickness.

Axial flaws on the outside surface of the penetration nozzle below the attachment weld are acceptable regardless of depth, as long as they do not extend into the attachment weld during the period of service until next inspection. Outside surface flaws above the attachment weld must be evaluated on a case by case basis, and must be discussed with the regulatory authority.

Circumferential flaws located below the weld are acceptable regardless of their depth, provided the length is less than 75 percent of the penetration nozzle circumference for the period of service until the next inspection. Circumferential flaws detected in this area have no structural significance except that loose parts must be avoided. To this end, intersecting axial and circumferential flaws shall be removed or repaired. Circumferential flaws at and above the weld must be discussed with the regulatory authority on a case by case basis.

Surface flaws located in the attachment welds themselves are not acceptable regardless of their depth. This is because the crack growth rate of the weld material is several times faster than that of the Alloy 600 material, and also because depth sizing capability does not yet exist for indications in the attachment weld.

The flaw acceptance criteria are summarized in Table 6-1. Flaws that exceed these criteria must be repaired unless analytically justified for further service. These criteria have been reviewed and endorsed by the NRC, as documented in references [15, 16, 17].

It is expected that the use of these criteria and crack growth curves will provide conservative predictions of the allowable service time.

Table 6-1 Summary of R.V. Head Penetration Flaw Acceptance Criteria

Location	Axial		Circumferential	
	a_f	l	a_f	l
Below Weld (ID)	t	no limit	t	.75 circ.
At and Above Weld (ID)	0.75 t	no limit	repair	repair
Below Weld (OD)	t	no limit	t	.75 circ.
Above Weld (OD)	repair	repair	repair	repair
<p>Note: Surface flaws of any size in the attachment weld are not acceptable.</p> <p>a_f = Flaw Depth l = Flaw Length t = Wall Thickness</p>				

Table 6-2 Diablo Canyon Units 1 and 2 Penetration Geometries [1, 2]

Penetration Type	Wall Thickness (in.)	Penetration OD (in.)
CRDM	0.625	4.000
Head Vent	0.154	1.050

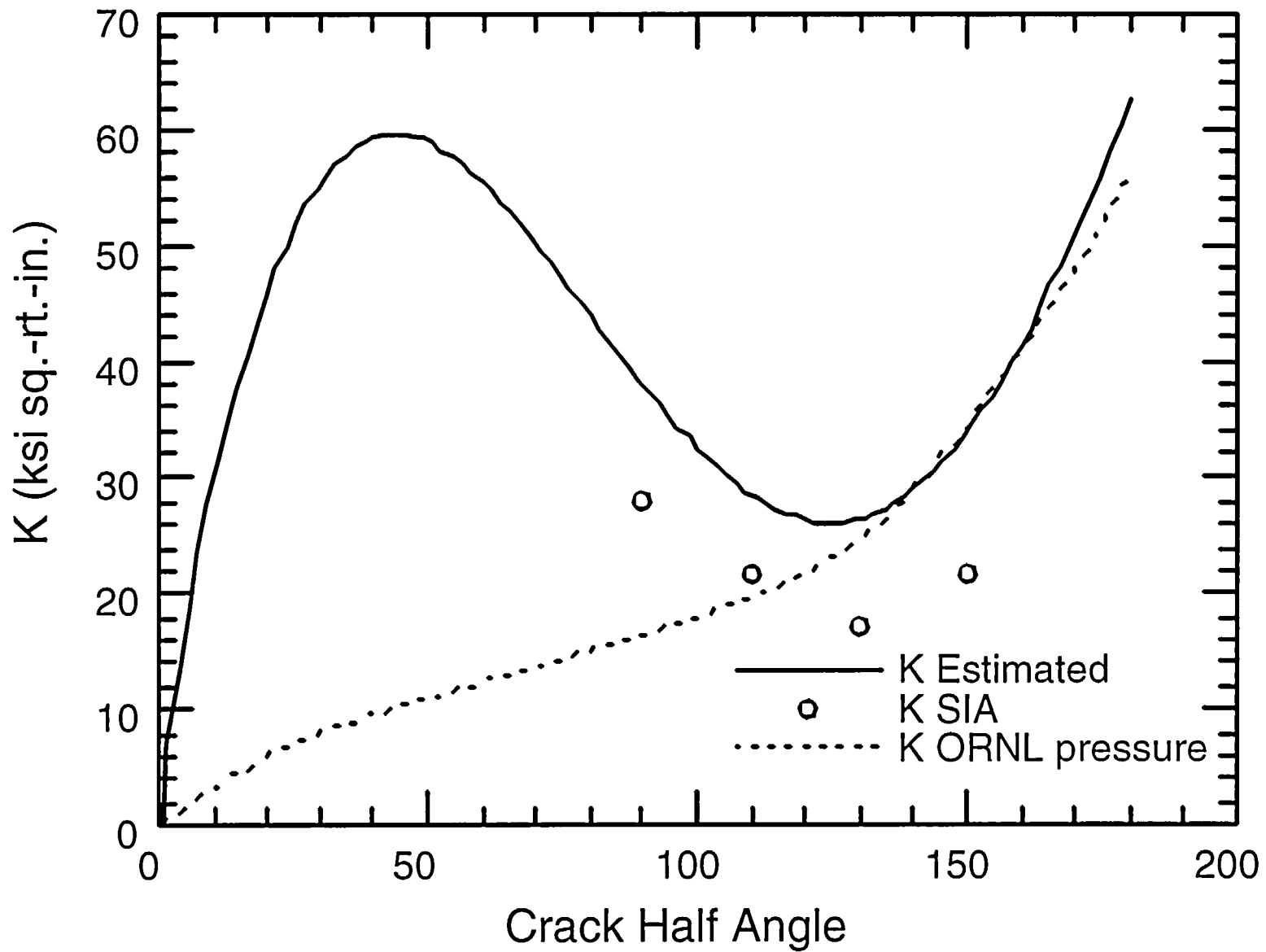


Figure 6-1 Stress Intensity Factor for a Through-Wall Circumferential Flaw in a Head Penetration

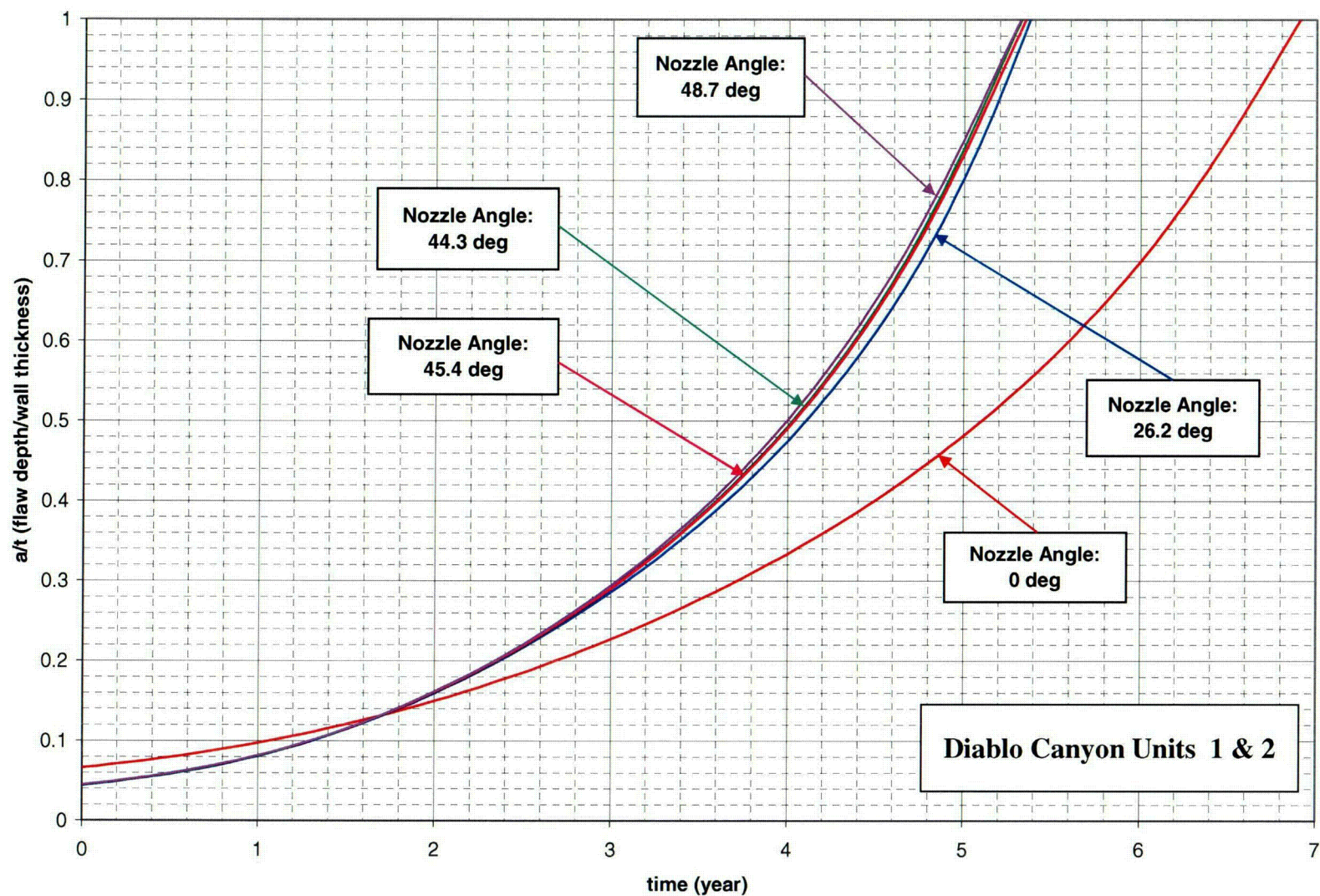


Figure 6-2 Inside, Axial Surface Flaws, .5" Below the Attachment Weld, Nozzle Uphill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

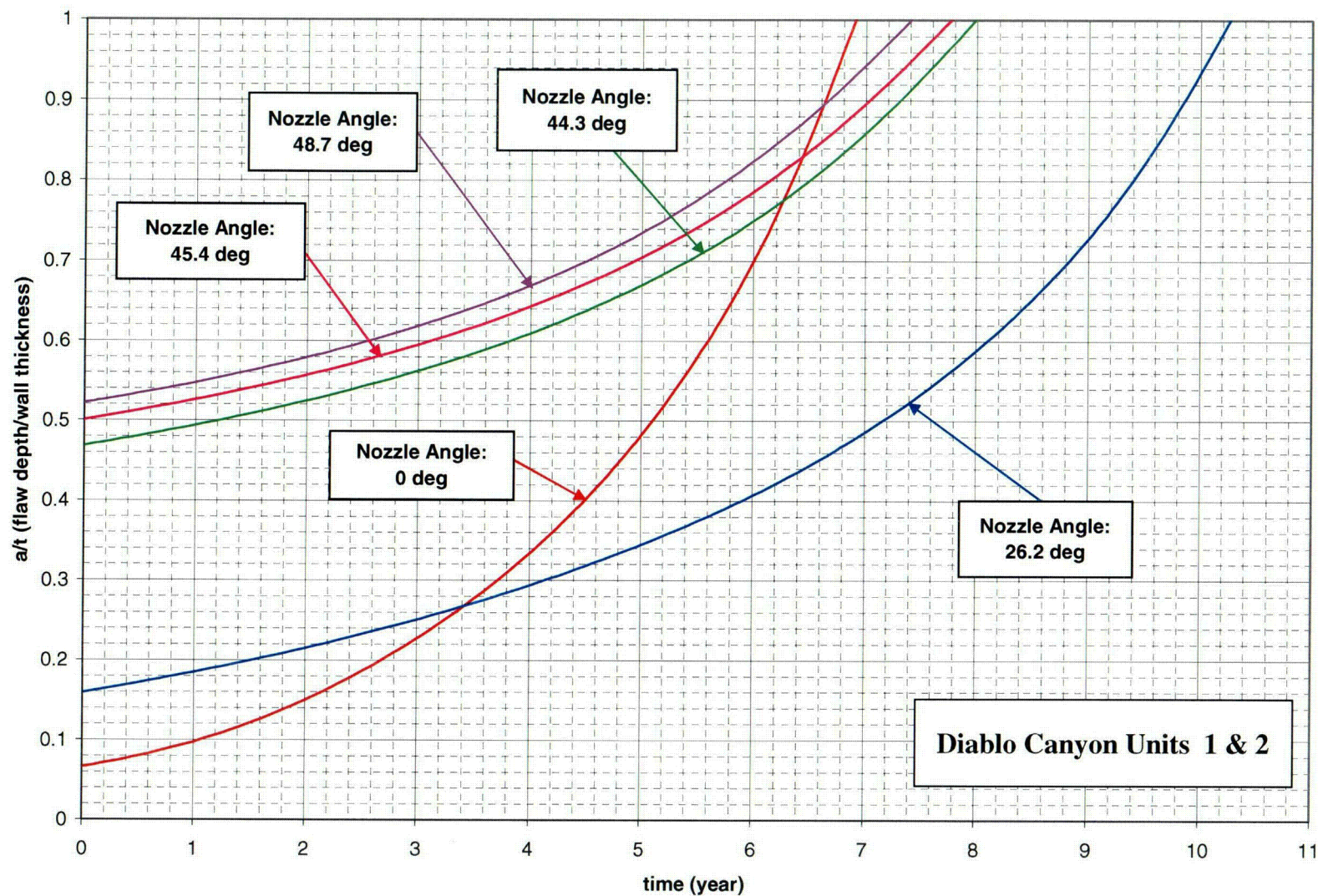


Figure 6-3 Inside, Axial Surface Flaws, .5" Below the Attachment Weld, Nozzle Downhill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

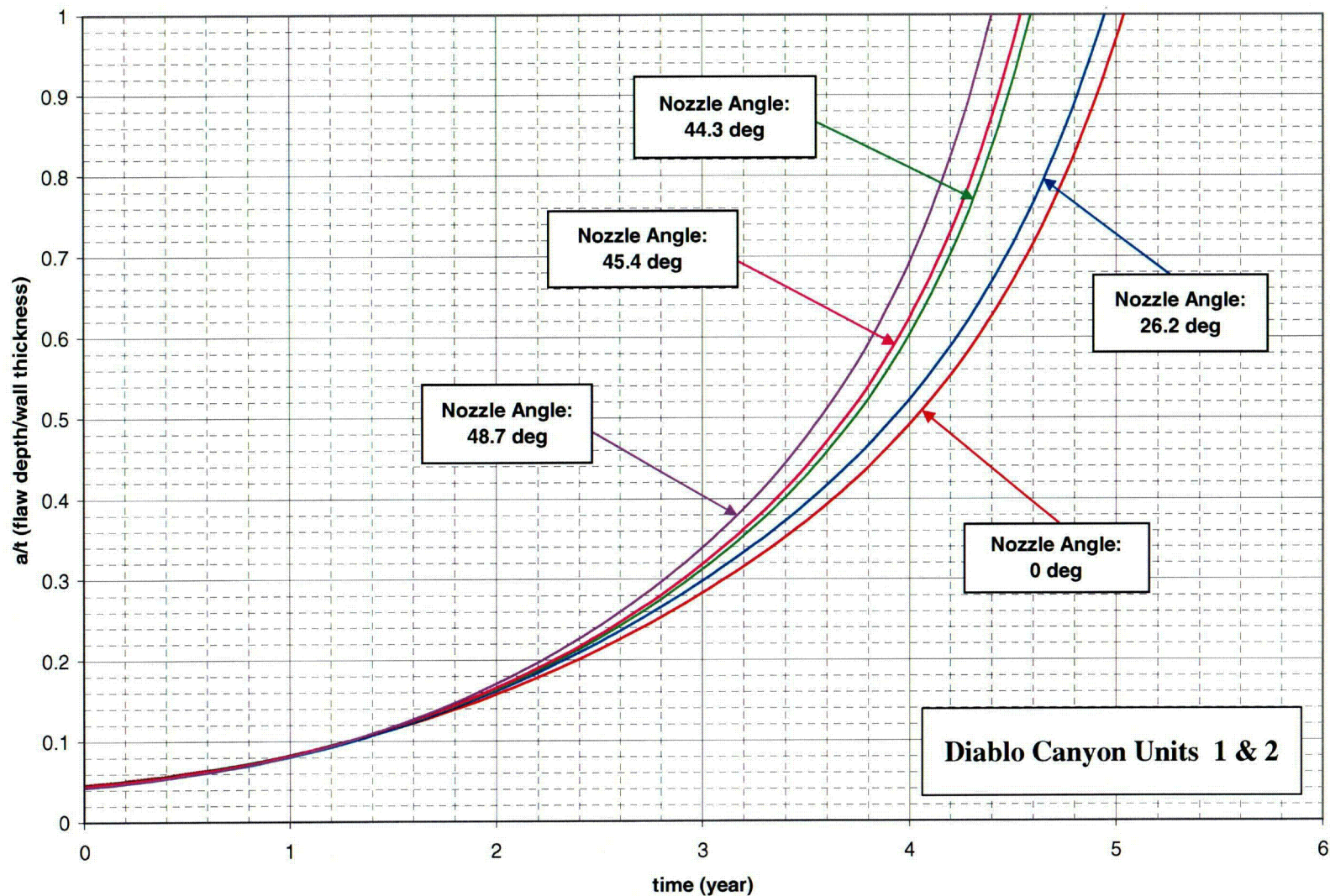


Figure 6-4 Inside, Axial Surface Flaws, At the Attachment Weld, Nozzle Uphill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

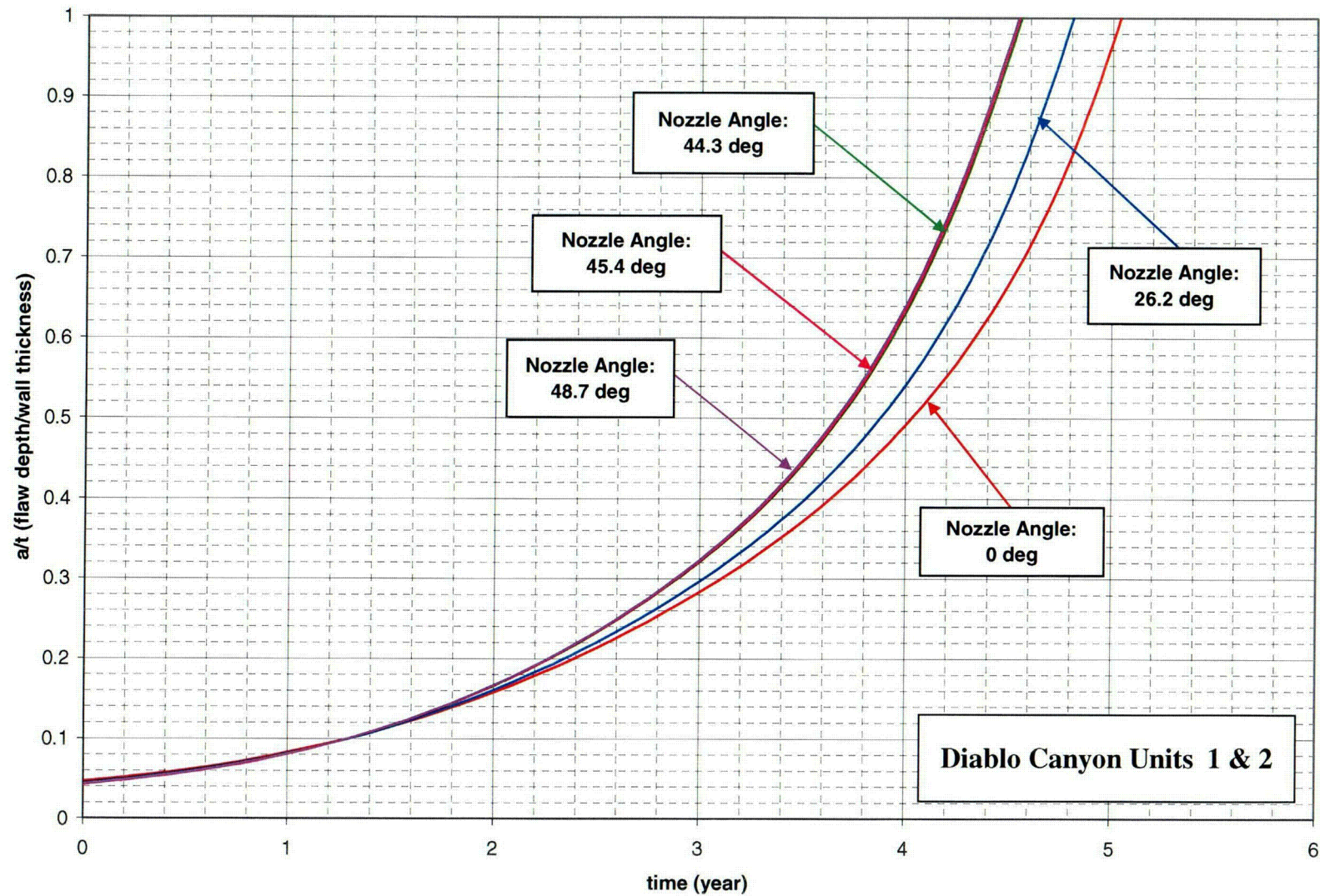


Figure 6-5 Inside, Axial Surface Flaws, At the Attachment Weld, Nozzle Downhill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

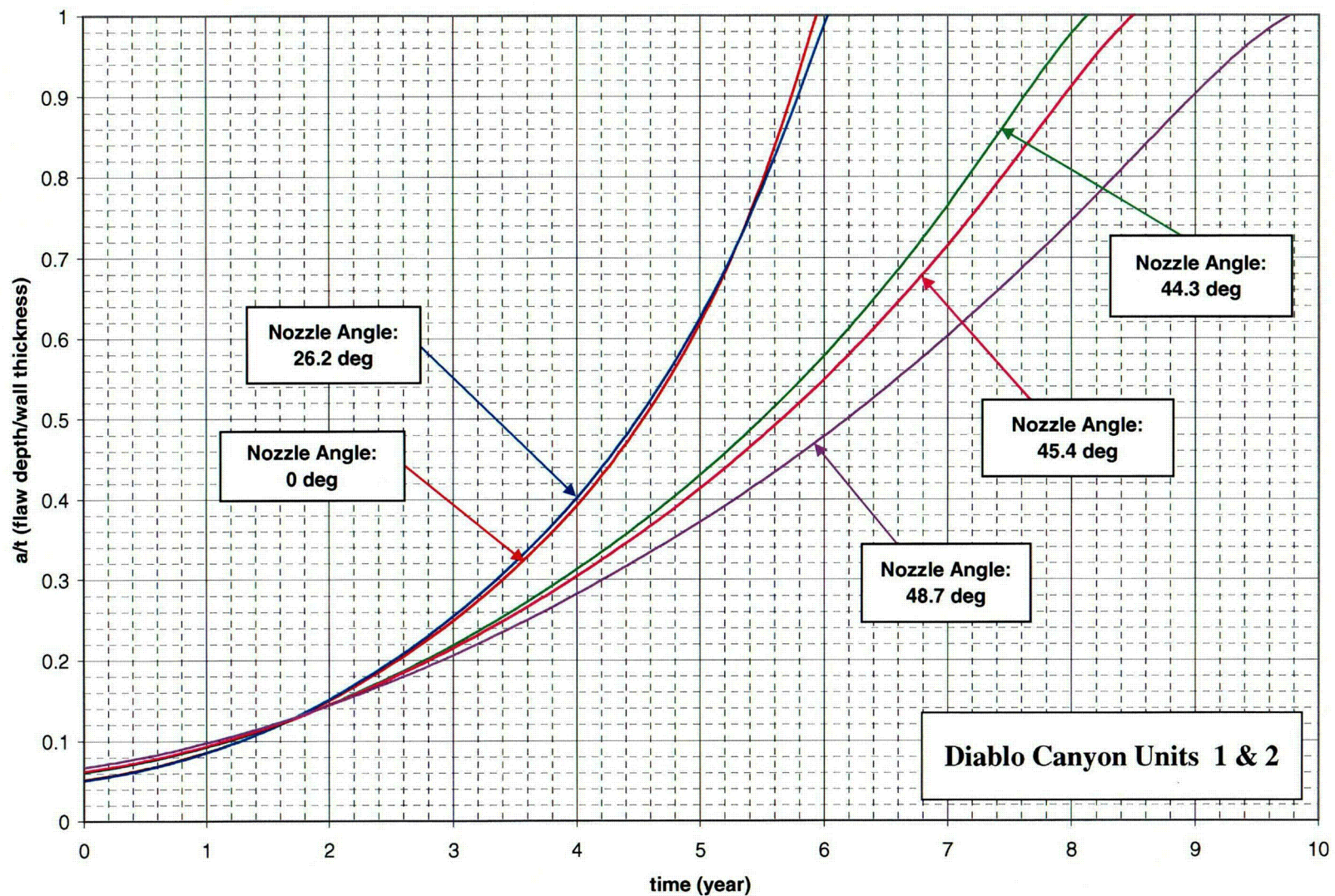


Figure 6-6 Inside, Axial Surface Flaws, .5" Above the Attachment Weld, Nozzle Uphill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

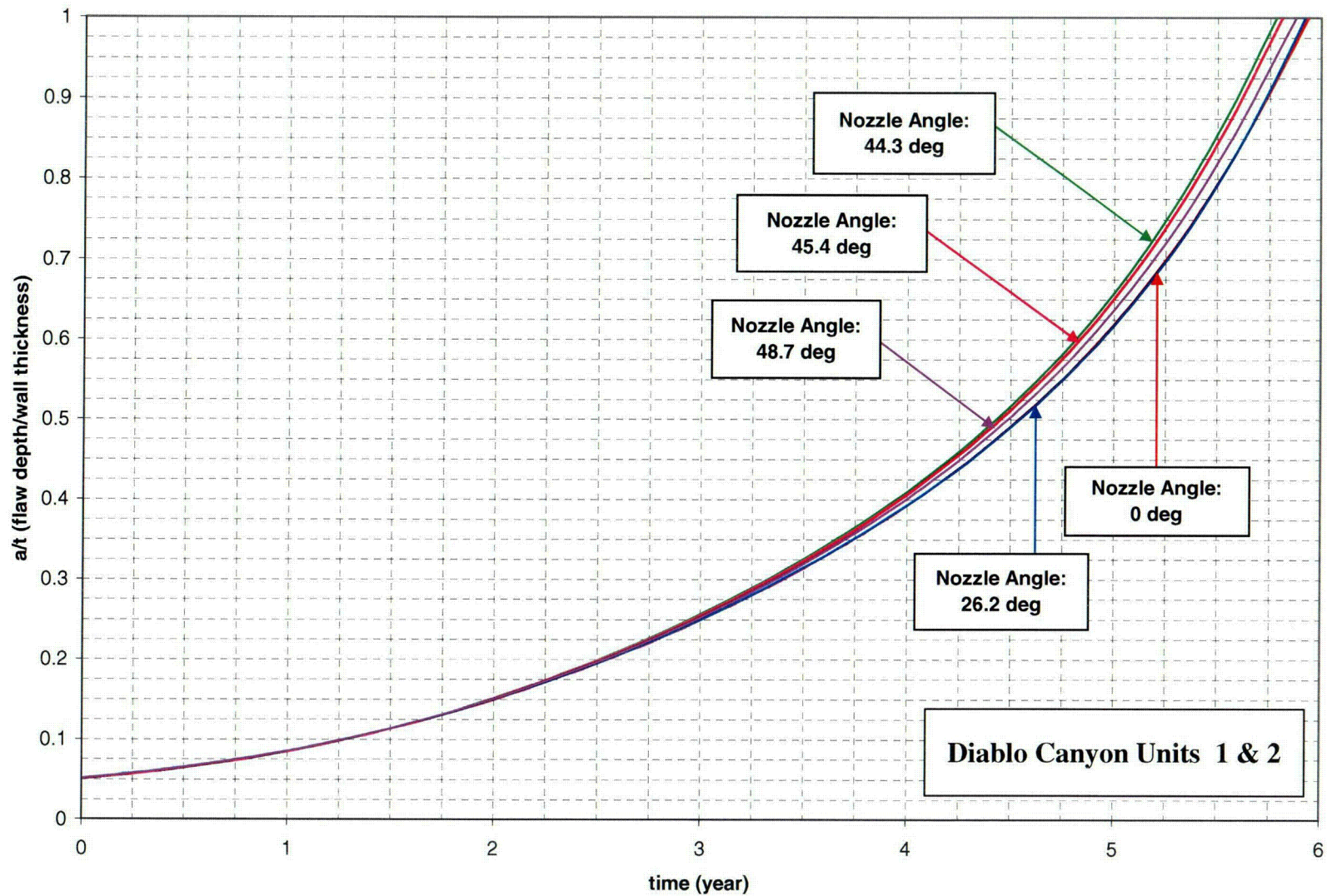


Figure 6-7 Inside, Axial Surface Flaws, .5" Above the Attachment Weld, Nozzle Downhill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

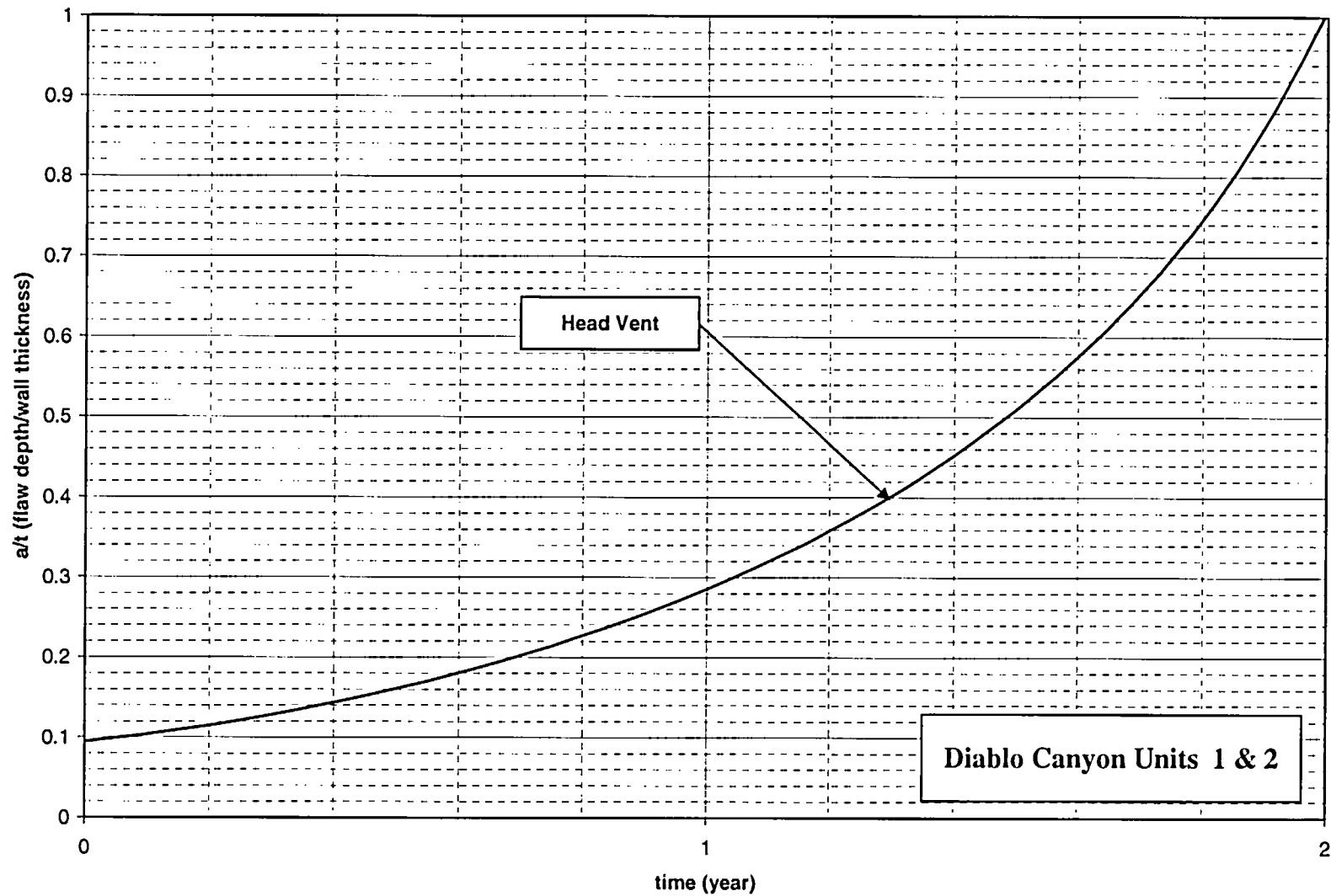


Figure 6-8 Inside, Axial Surface Flaws, At the Attachment Weld, Head Vent- Crack Growth Predictions for Diablo Canyon Units 1 and 2

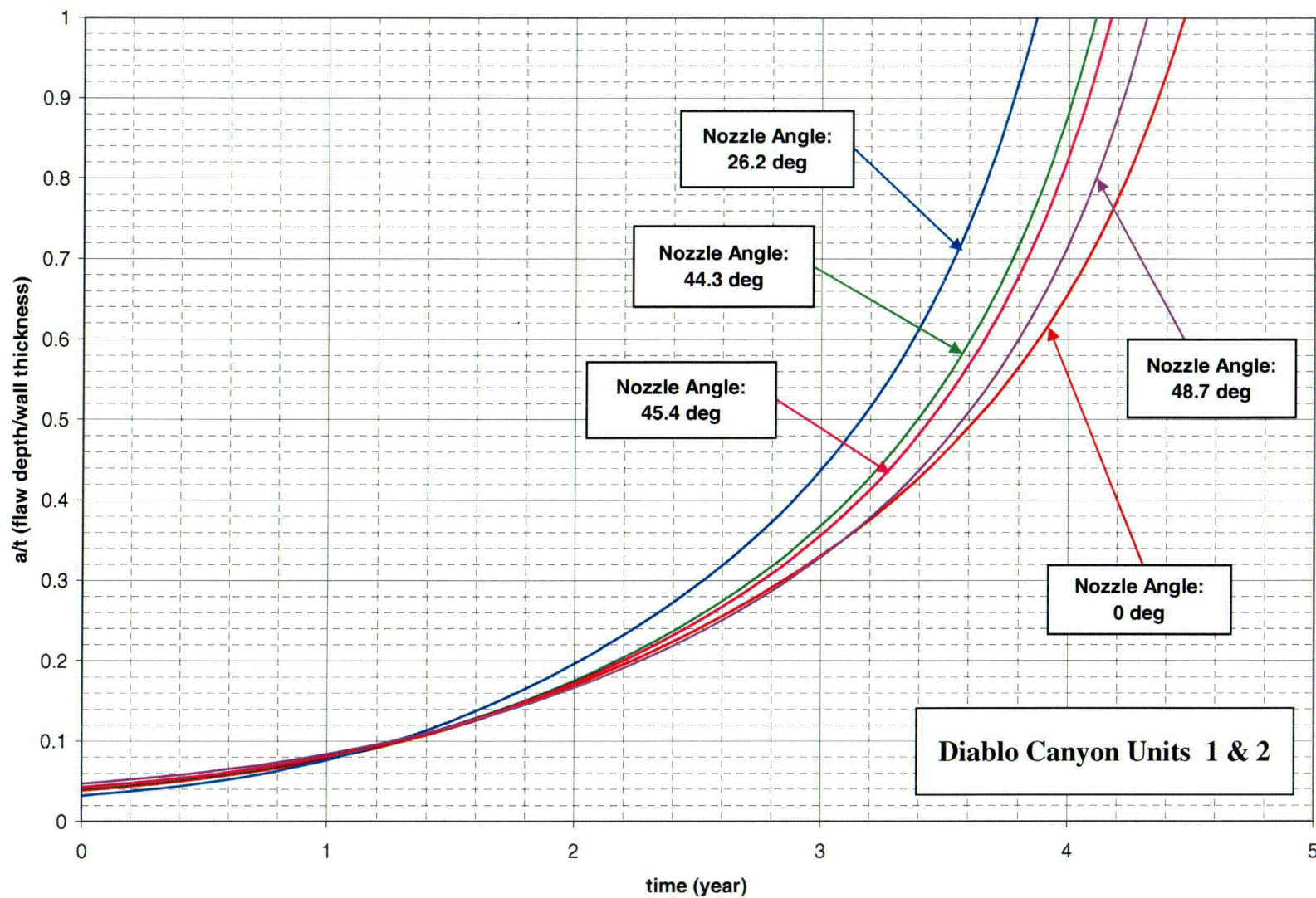


Figure 6-9 Outside, Axial Surface Flaws, Below the Attachment Weld, Nozzle Uphill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

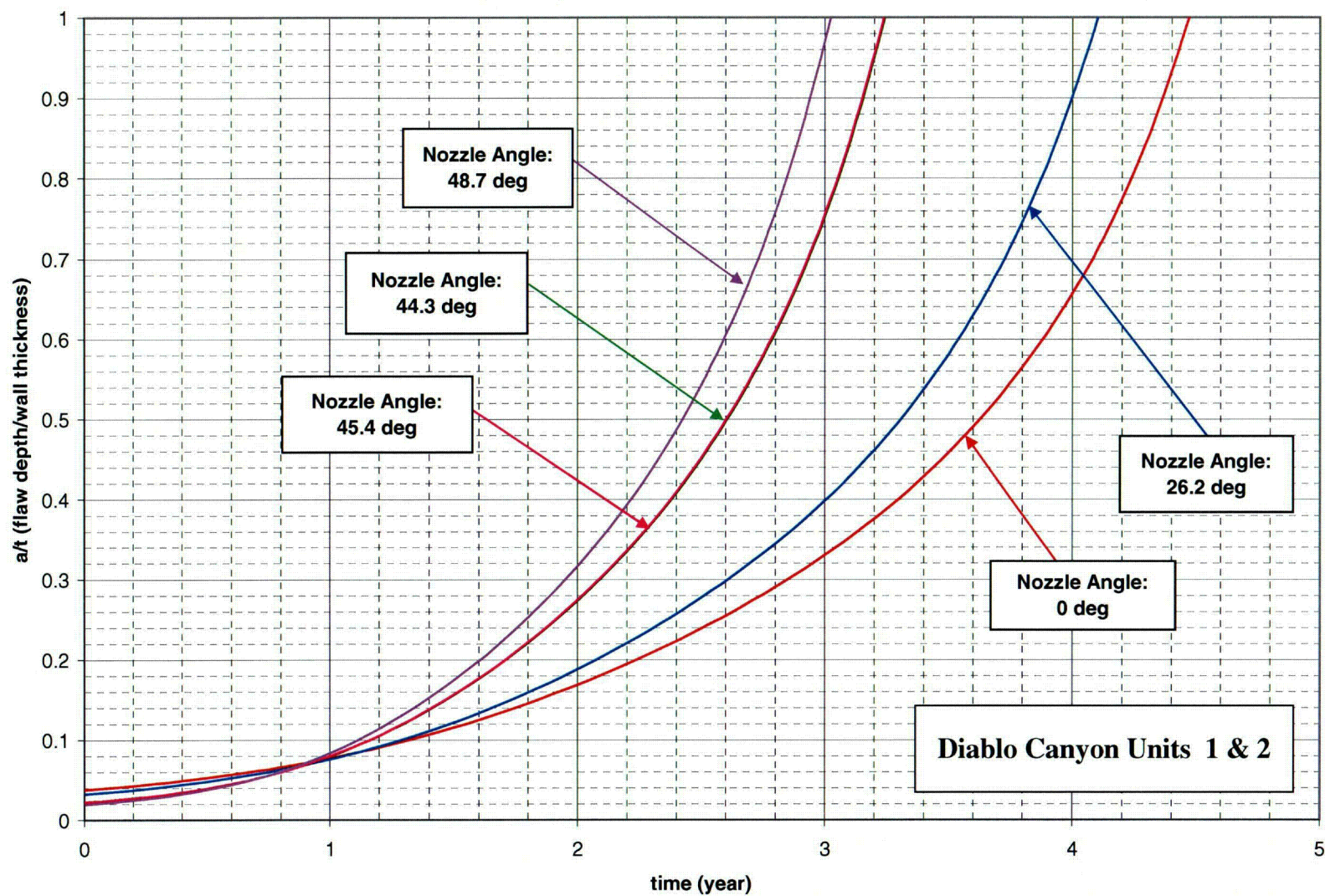


Figure 6-10 Outside, Axial Surface Flaws, Below the Attachment Weld, Nozzle Downhill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

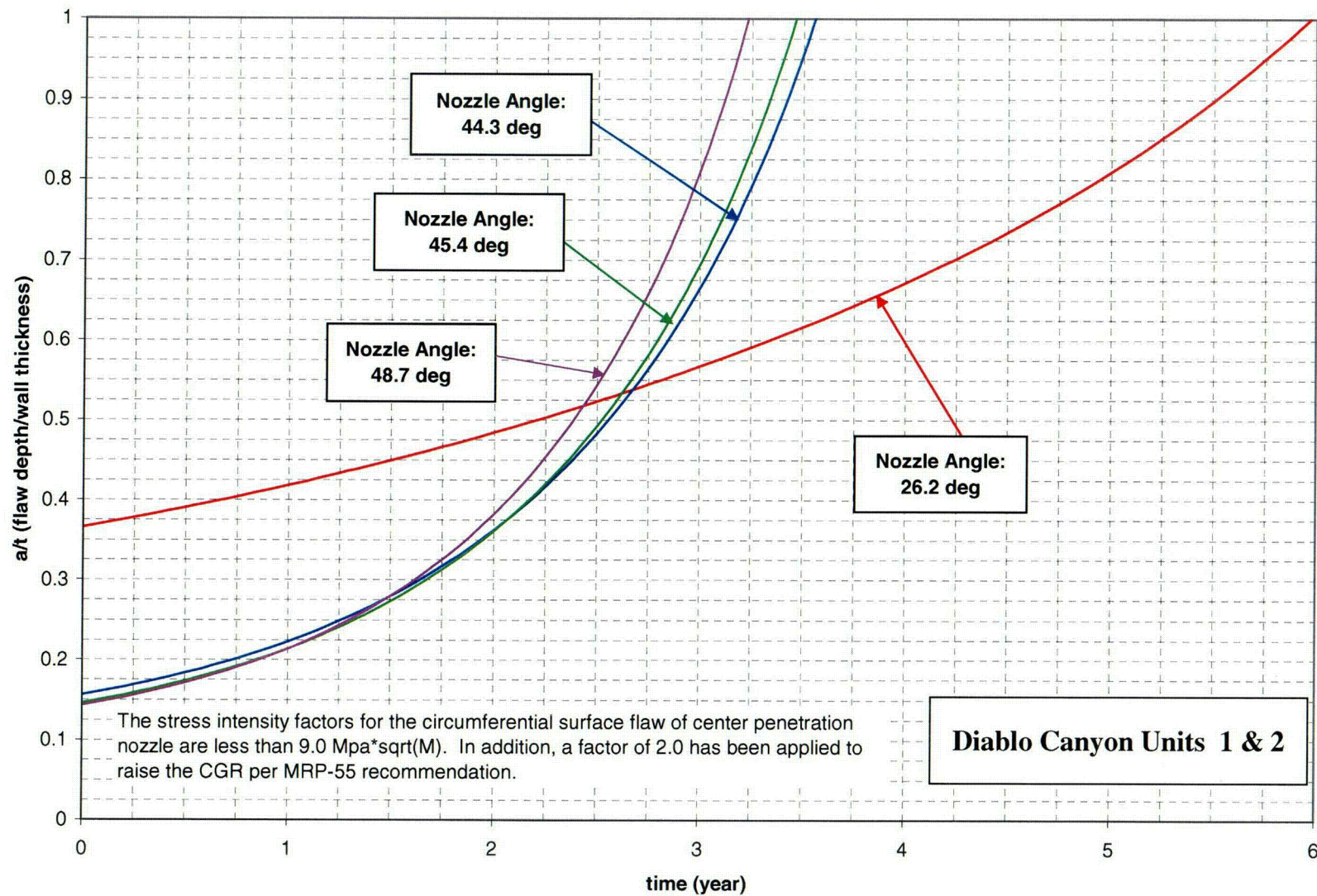


Figure 6-11 Outside, Circumferential Surface Flaws, Along the Top of the Attachment Weld - Crack Growth Predictions for Diablo Canyon Units 1 and 2 (MRP Factor of 2.0 Included)

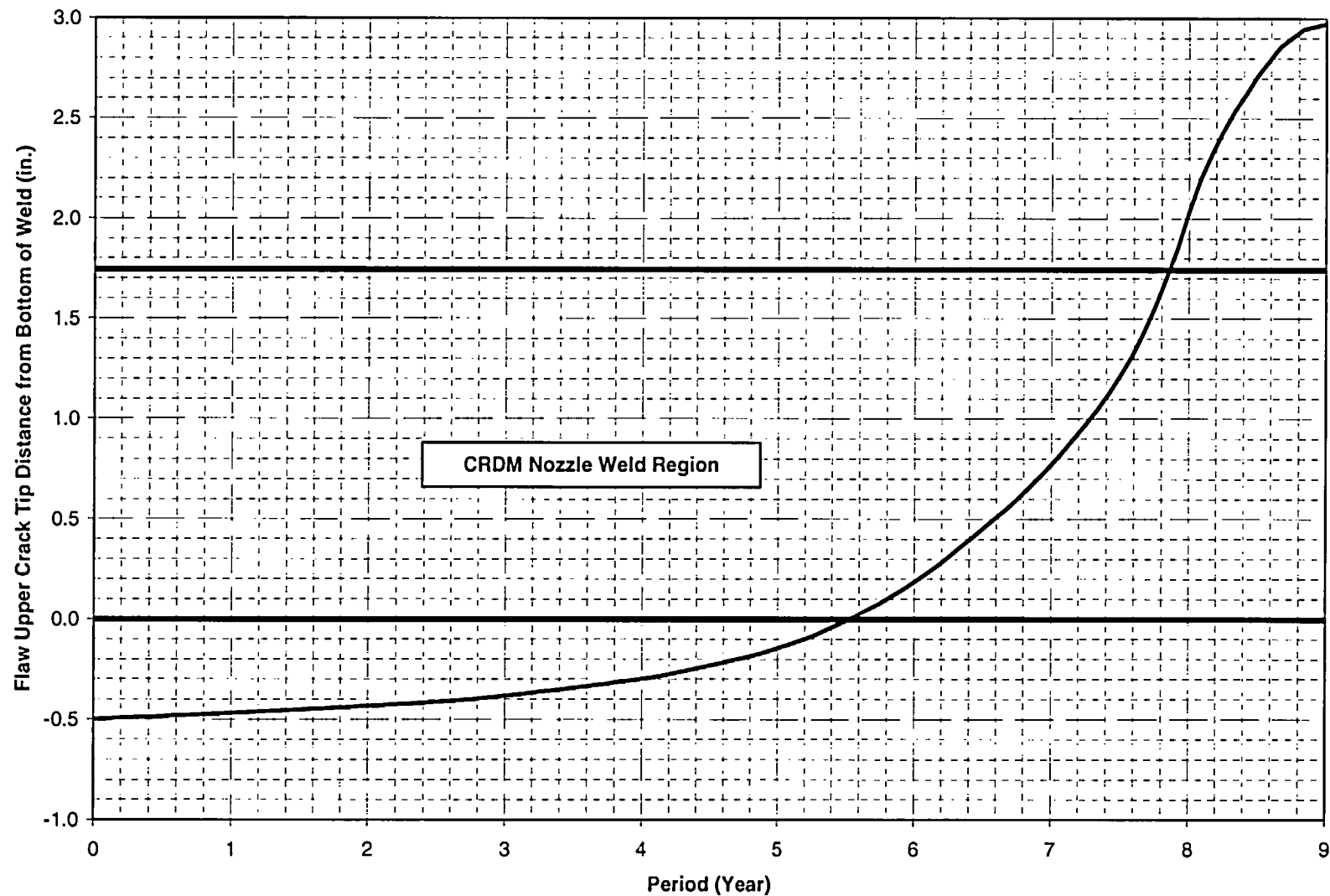


Figure 6-12 Through-Wall Axial Flaws Located in the Center CRDM (0.0 Degrees) Penetration - Crack Growth Predictions for Diablo Canyon Units 1 and 2

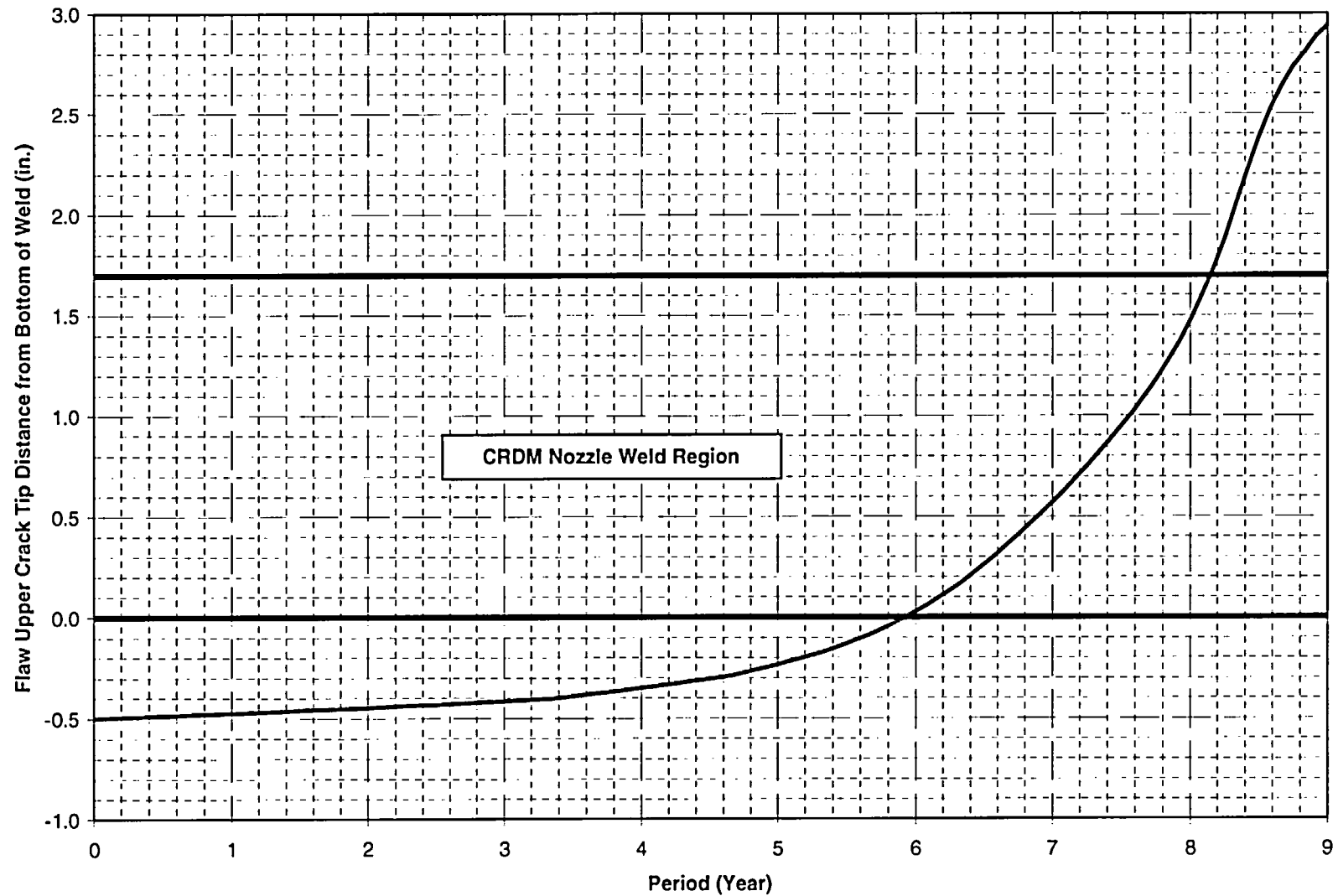


Figure 6-13 Through-Wall Axial Flaws Located in the 26.2 Degrees CRDM Row of Penetrations, Downhill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

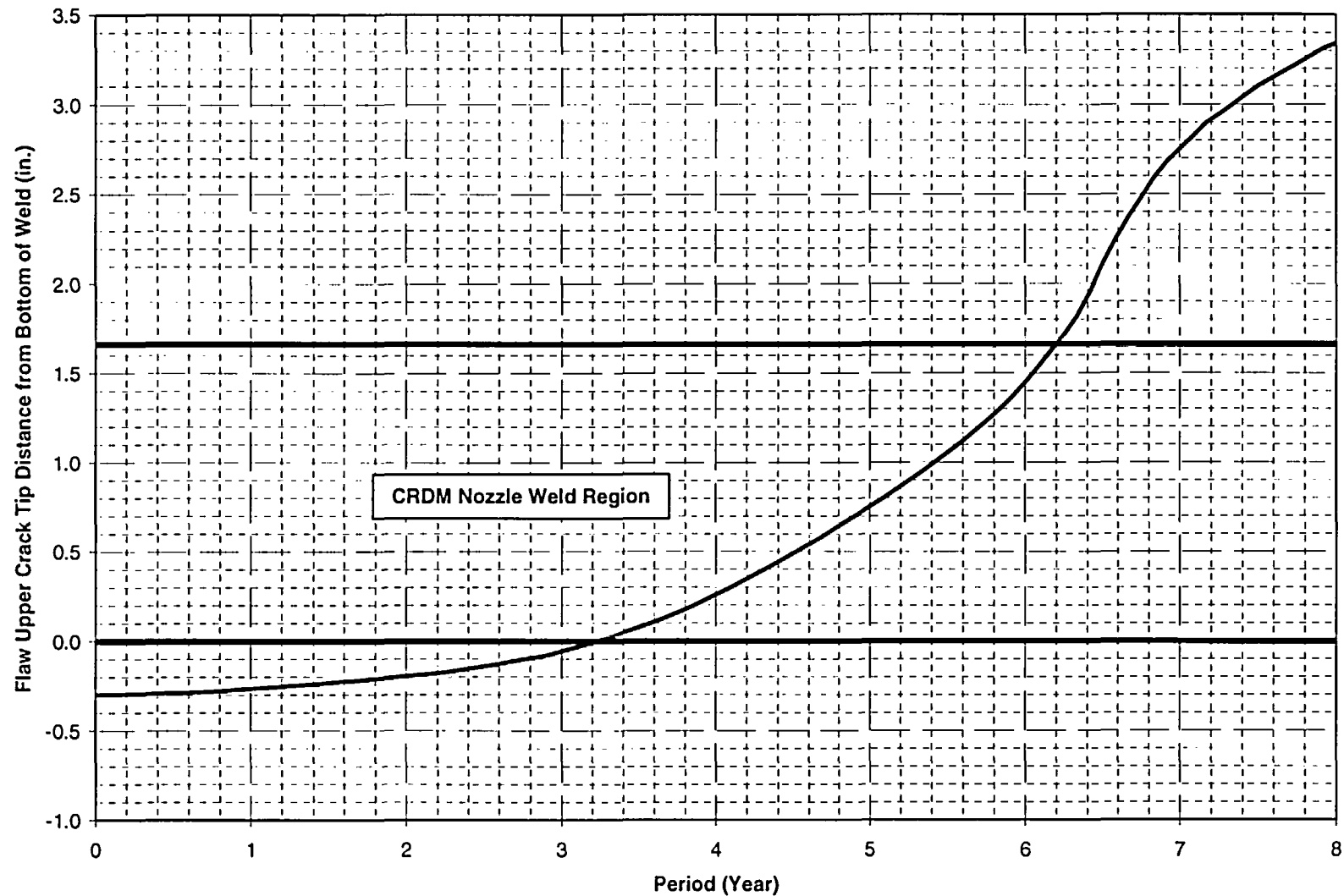


Figure 6-14 Through-Wall Axial Flaws Located in the 44.3 Degrees CRDM Row of Penetrations, Downhill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

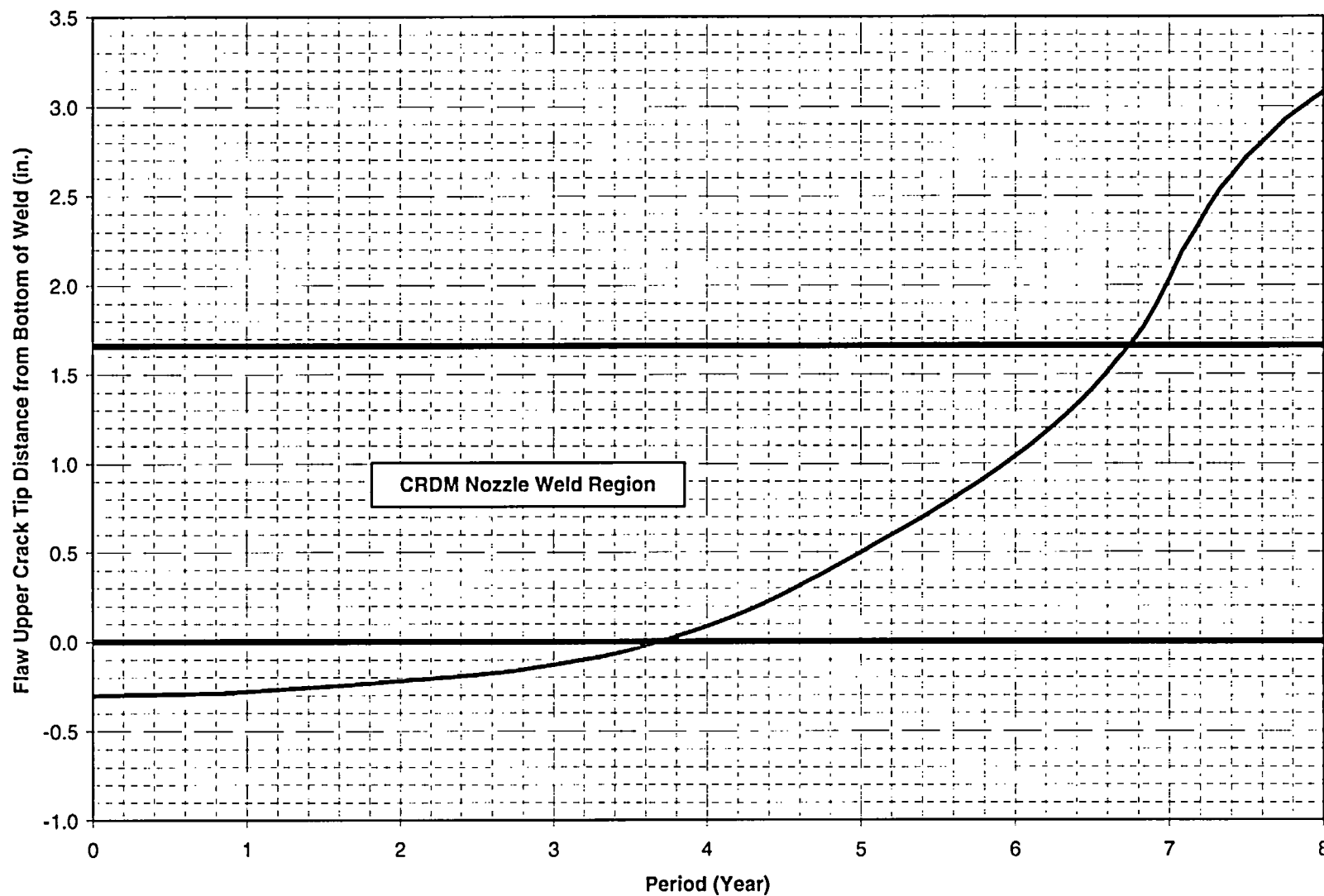


Figure 6-15 Through-Wall Axial Flaws Located in the 45.4 Degrees CRDM Row of Penetrations, Downhill Side - Crack Growth Predictions for Diablo Canyon Unit 2

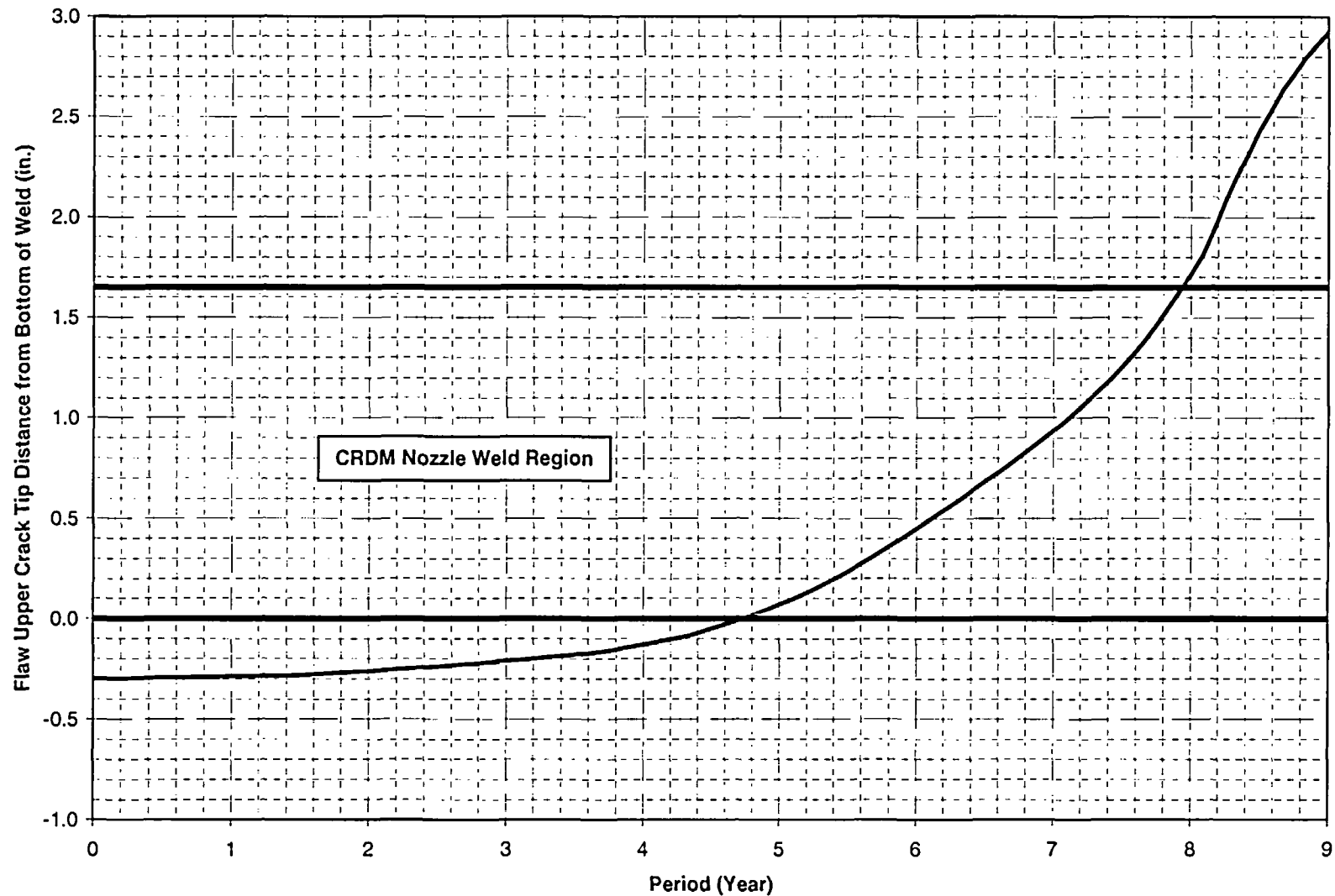


Figure 6-16 Through-Wall Axial Flaws Located in the 48.7 Degrees CRDM Row of Penetrations, Downhill Side - Crack Growth Predictions for Diablo Canyon Units 1 and 2

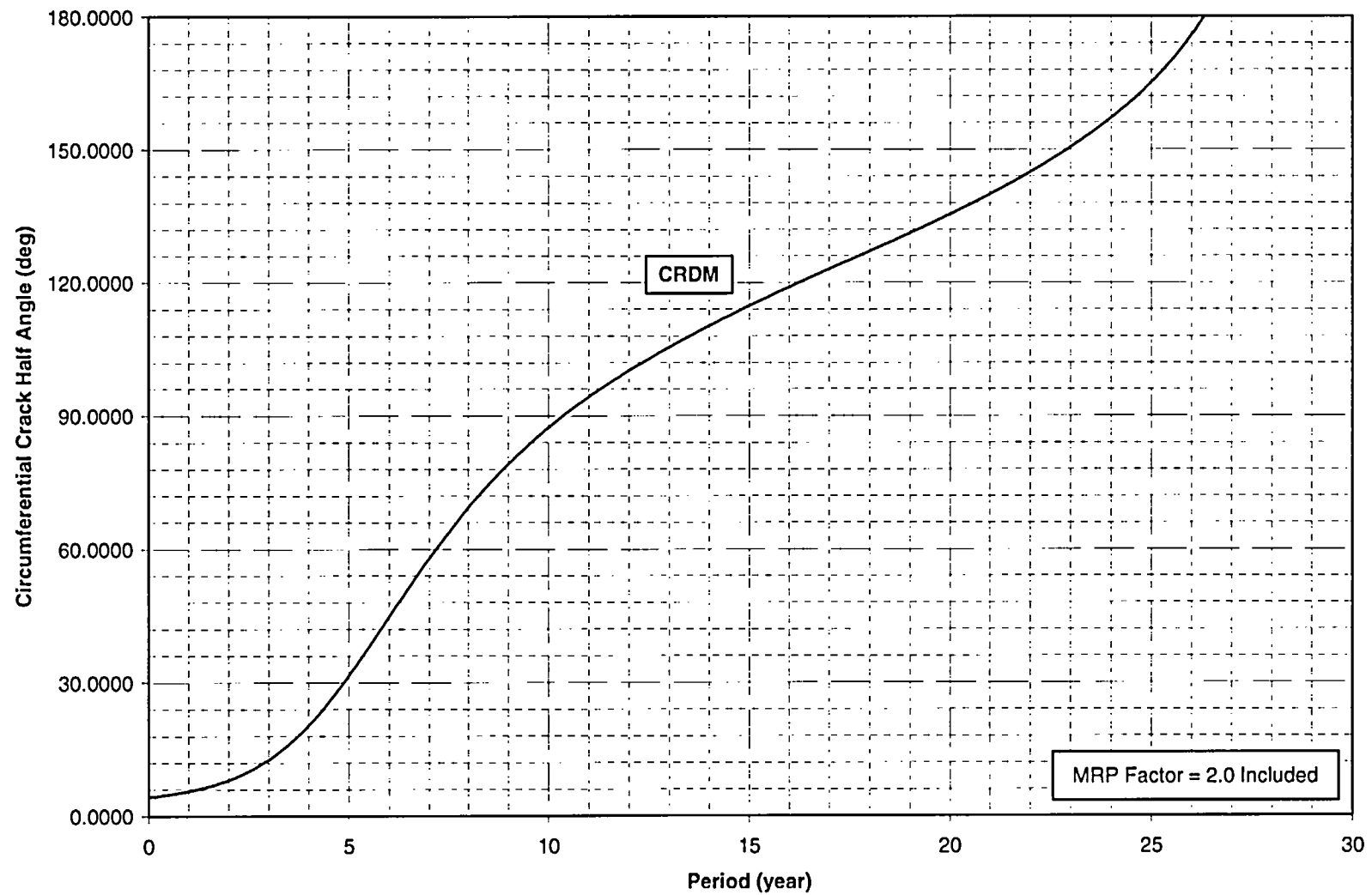


Figure 6-17 Through-Wall Circumferential Flaws Near the Top of the Attachment Weld for CRDM Nozzles - Crack Growth Predictions for Diablo Canyon Units 1 and 2 (MRP Factor of 2.0 Included)

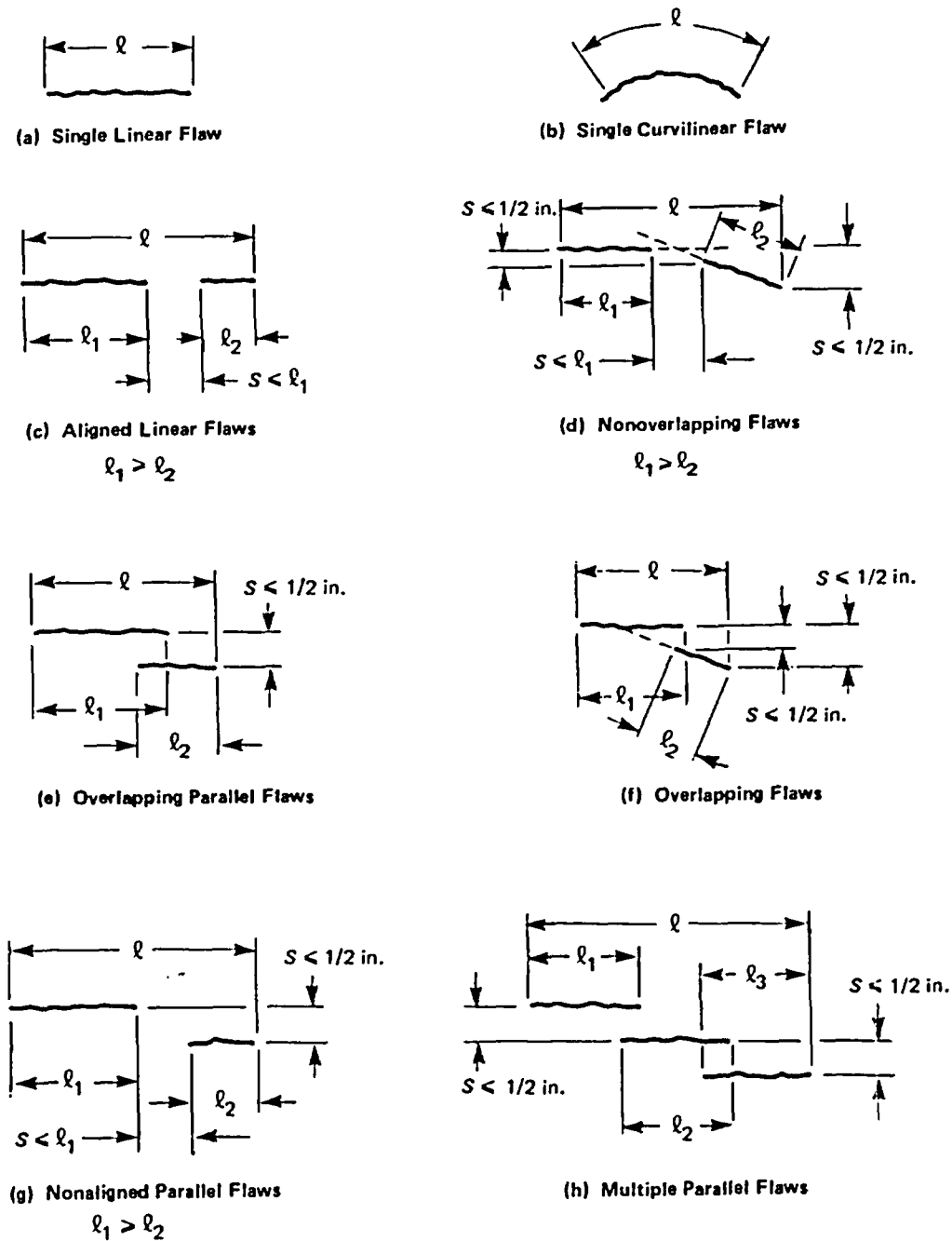


Figure 6-18 Section XI Flaw Proximity Rules for Surface Flaws (Figure IWA-3400-1)

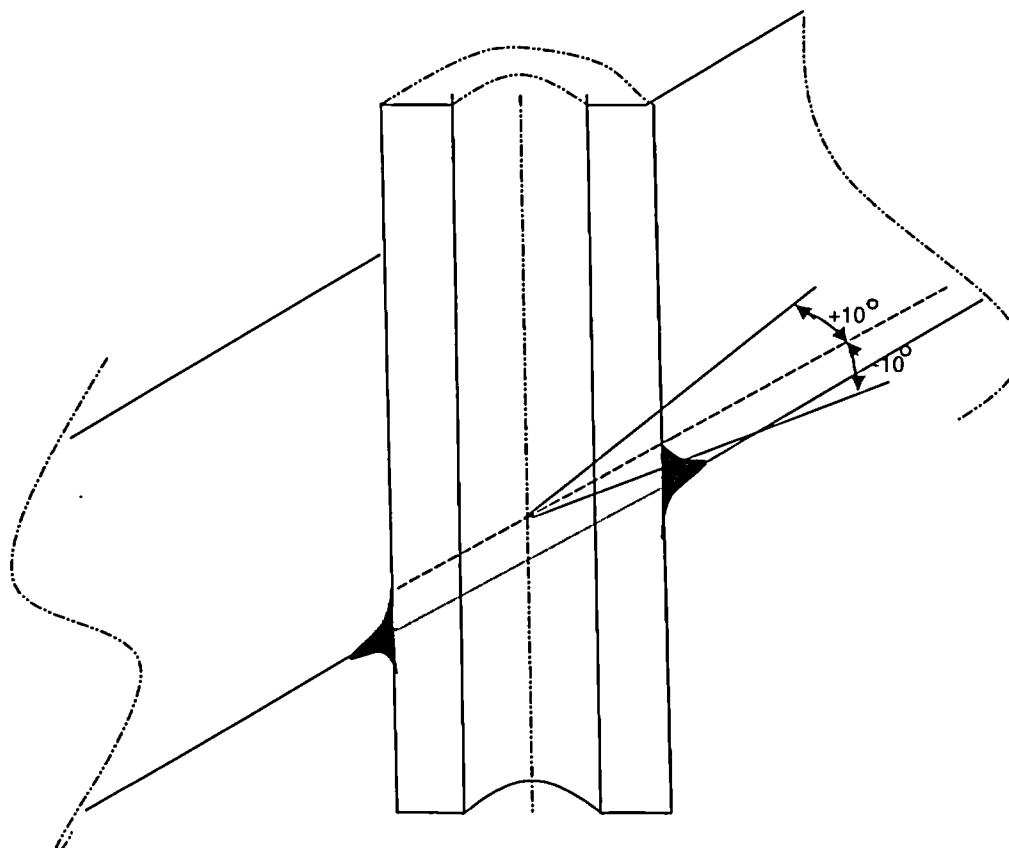


Figure 6-19 Definition of "Circumferential"

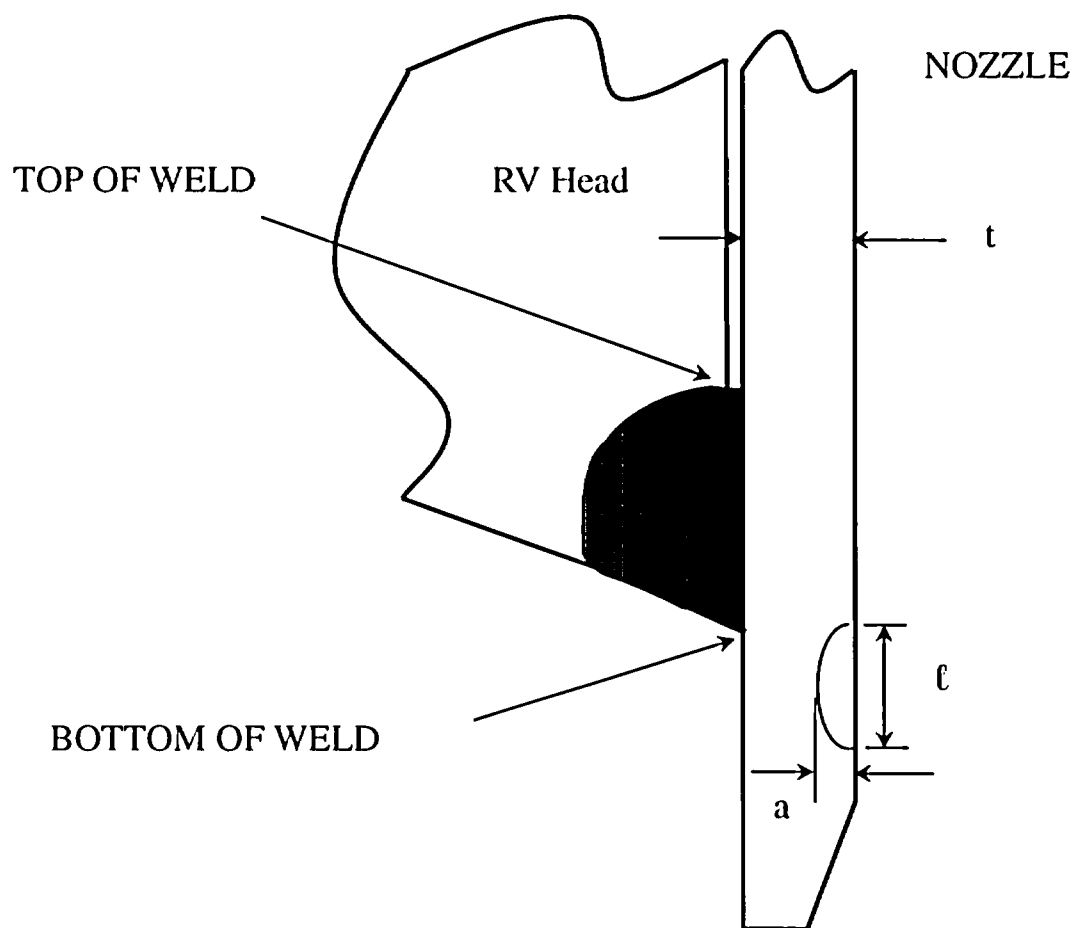


Figure 6-20 Schematic of Head Penetration Geometry

7 SUMMARY AND EXAMPLE PROBLEMS

An extensive evaluation has been carried out to characterize the loadings and stresses, which exist in the head penetrations at Diablo Canyon Units 1 and 2 reactor vessel head. Three-dimensional finite element models were constructed [4], and all pertinent loadings on the penetrations were analyzed. These loadings included internal pressure and thermal expansion effects typical of steady state operation. In addition, residual stresses due to the welding of the penetrations to the vessel head were considered.

Results of the analyses reported here are consistent with the axial orientation and location of flaws which have been found in service in a number of plants and that the largest stress component is the hoop stress, and the maximum stresses were found to exist at the attachment weld. The most important loading conditions were found to be those which exist on the penetration for the majority of the time, which are the steady state loading and the residual stresses.

These stresses are important because the cracking observed to date in operating plants has been determined to result from primary water stress corrosion cracking (PWSCC). These stresses were used in the fracture calculations to predict the future growth of flaws postulated to exist in the head penetrations. A crack growth law was developed specifically for the operating temperature of the head at Diablo Canyon Units 1 and 2 reactor pressure vessel, based on the EPRI recommendation, which is consistent with laboratory data as well as crack growth results for operating plants.

The crack growth predictions contained in Section 6 show that the future growth of cracks which might be found in the penetrations will be typically moderate, however, a number of effective full power years would be required for any significant extensions. The propagation of circumferential flaws is much slower than that of axial flaws since the stresses responsible for cracking in the circumferential direction (axial stresses) are relatively small compare to the hoop stresses responsible for cracking in the axial direction.

7.1 SAFETY ASSESSMENT

It is appropriate to examine the safety consequences of an indication which might be found. The indication, even if it were to propagate through the penetration nozzle wall, would have only minor consequences, since the pressure boundary would not be broken, unless it were to propagate above the weld.

Further propagation of the indication would not change its orientation, since the hoop stresses in the penetration nozzle are much larger than the axial stresses. Therefore, it is extremely unlikely that the head penetration would be severed.

If the indication were to propagate to a position above the weld, a leak could result, but the magnitude of such a leak would be very small, because the crack could not open significantly due to the tight fit between the penetration nozzle and the vessel head. Such a leak would have no immediate impact on the structural integrity of the system, but could lead to wastage in the

ferritic steel of the vessel head, as the borated primary water concentrates due to evaporation. Davis Besse has demonstrated the consequence of ignoring such leaks.

Any indication is unlikely to propagate very far up the penetration nozzle above the weld, because the hoop stresses decrease in this direction, and this will cause it to slow down, and to stop before it reaches the outside surface of the head.

The high likelihood that the indication will not propagate up the penetration nozzle beyond the vessel head ensures that no catastrophic failure of the head penetration will occur, since the indication will be enveloped in the vessel head itself, which precludes the opening of the crack and limits leakage.

It should be noted that the objective of the acceptance criteria shown in Table 6-1 is to prevent leakage. Therefore, even though a small leak may have no immediate impact on the structural integrity of the system, it is not acceptable to the NRC and nozzle repair is required.

7.2 EXAMPLE PROBLEMS

The flaw tolerance charts in Figures 6-2 through 6-17 can be used with the acceptance criteria of Section 6.5 to determine the available service life for Diablo Canyon Units 1 and 2. In this section, a few examples will be presented to illustrate the use of these figures for Unit 1. The results for Unit 2 can be obtained using similar calculation process. The example cases are listed in Table 7-1.

Example 1. Determine the service life of an axially oriented inside surface flaw whose upper extremity is located 1.25" below the weld on the uphill side of penetration no. 30. First, the penetration locality angle is obtained from Table 1-1 and, in this case, the locality angle is 26.2 degrees. The initial flaw depth, a_{initial} , is 0.078" and the initial flaw length, $2c_{\text{initial}}$, is 0.195". Assuming that the initial aspect ratio of 2.5:1 is maintained throughout the time that the inside surface flaw becomes a through-wall flaw, the final length of the flaw ($2c_{\text{final}}$) will be 1.563". The upper extremity of the flaw is now located 0.566" below the weld and validates the use of a single crack growth curve. The crack growth curve for the 26.2 degrees nozzle angle of Figure 6-2 is applicable and Figure 6-2 has been reproduced as Figure 7-1. The flaw is initially 12.5 percent of the wall thickness, and a straight line is drawn horizontally at $a/t = 0.125$ that intersects the crack growth curve. Using the acceptance criteria in Table 6-1, the service life can then be determined as the remaining time for this flaw to grow to the limit of 100 percent of the wall thickness or approximately 3.7 years (labeled as "Service Life" in Figure 7-1)

Example 2. In this case, the flaw is identical in size to that used in Example 1, but located on the outside surface and on the downhill side of penetration no. 30. This flaw, just as the flaw in Example 1, will not cross into the weld region. The applicable curve to use is Figure 6-10. The ratio a/t and initial reference time are likewise found using the same approach as used in Example 1. Using the acceptance criteria in Table 6-1, the determination of service life is illustrated in Figure 7-2, where we can see that the result is approximately 2.6 years.

Example 3. An axial inside surface flaw is located at the weld and on the downhill side of penetration no. 79. The initial length of the flaw is 0.250" and the initial depth is 0.05". From Table 1-1, the angle of this penetration nozzle is 48.7 degrees. The applicable curve is Figure 6-5 and is reproduced here as Figure 7-3. In this case, the initial flaw depth is 8.0 percent of the wall thickness. The initial reference time can be found by drawing a horizontal line at $a/t = 0.08$. Using the acceptance criteria in Table 6-1, the allowable service life can then be determined as the time for the flaw to reach a depth of 75 percent of the wall thickness. The final reference time is found through a horizontal line drawn at $a/t = 0.75$. The service life can be determined through the intersection points of these lines and the crack growth curve. The resulting service life is approximately 3.2 years, as shown in Figure 7-3.

Example 4. In this case, we have postulated an axial inside surface flaw with an upper extremity located 1.0 inch below the attachment weld on the uphill side of penetration no. 79 (48.7 degrees). The flaw has an initial depth of 0.079" and an initial length of 0.395". Assuming that the initial aspect ratio of $0.395" / 0.079"$ or 5:1 is maintained as the flaw propagates into the nozzle wall, the final length of a through-wall flaw would be $0.625" \times 5 = 3.125"$ long. The location of the upper extremity of this flaw would have reached within 0.5 inch below the weld as it propagates into the nozzle wall ($1.0" - ((3.125" / 2) - (0.395" / 2)) = -0.365"$). Therefore the evaluation will require the use of two flaw charts. The first step is to estimate the time required for the initial flaw to grow to within 0.5 inch from the weld. This can be accomplished with the use of Figure 6-2 and is reproduced here as Figure 7-4a. The upper extremity is 1 inch below the weld and is assumed to grow until the extremity is 0.5 inches below the weld. The final half-length of the flaw when it reaches 0.5 inches below the weld will be the sum of the initial half-length and the 0.5 inches it has grown or $0.395" / 2 + 0.5" = 0.6975"$. Multiplying this by two and then dividing by the aspect ratio gives the flaw depth when the upper extremity is 0.5 inches below the weld: $2 \times 0.6975" / 5.0 = 0.279"$. Figure 7-4a can be used to find the time it takes to grow from 12.6% through-wall ($a/t = 0.079" / 0.625" = 0.126$) to 44.6% through-wall ($a/t = 0.279" / 0.625" = 0.446$). The time is estimated as 2.2 years. Using the flaw depth calculated previously ($a/t = 0.446$) as the initial flaw depth, the curves in Figure 6-4 reproduced here as Figure 7-4b for inside surface flaws near the weld can be used to determine the remaining service time before the flaw depth reaches the allowable flaw size ($a/t = 0.75$). Using the acceptance criteria in Table 6-1, Figure 7-4b shows an additional 0.7 years of service life for a total of 2.9 years.

As shown above, flaws whose upper extremities grow within 0.5 inch below weld require the use of both the 0.5 inch below weld and "at the attachment weld" flaw tolerance charts. To avoid the use of these two charts, the "at the weld" chart may solely be used in determining the service life. This shall provide a conservative estimate of the crack growth due to the higher stress field.

Example 5. This case is an axial through-wall flaw with its upper extremity located 0.40 inches below the weld region of penetration no. 33. This would be the case where inspection can only be performed from 2 inch above the J-weld to only 0.40 inches below the weld on the downhill side. The objective is to determine the remaining service life for a flaw in the un-inspected region below the weld to reach the bottom of the J-weld. The angle of the penetration nozzle is 26.2 degrees as shown in Table 1-1. The crack growth curve of Figure 6-13 is applicable and has been reproduced as Figure 7-5. The initial reference time is found by drawing a horizontal line 0.40

inches below the line representing the bottom of the weld, then dropping a vertical line to the x axis. The final reference time is found by drawing a vertical line where the crack growth curve intersects the bottom of the weld horizontal line. If inspection can only be performed from 2 inch above the J-weld to only 0.4 inches below the weld, it would take approximately 2.4 years for a flaw in the un-inspected region below the weld to reach the weld bottom.

Several additional guidelines are provided below to facilitate the use of these flaw tolerance charts.

1. If a flaw is found in a penetration nozzle for which no specific analysis was performed and there is a uniform trend as a function of penetration nozzle angle, interpolation between penetration nozzle is the best approach.
2. If a flaw is found in a penetration nozzle for which no specific analysis was performed and there is no apparent trend as a function of penetration nozzle angle, the result for the penetration nozzle with the closest angle should be used.
3. If a flaw is found which has a depth smaller than any depth shown for the penetration nozzle angle of interest, the initial flaw depth should be assumed to be the same as the smallest depth analyzed for that particular penetration nozzle.
4. The flaw evaluation charts are applicable for aspect ratio of 6 or less. Consult with Westinghouse if the as-found flaw has an aspect ratio larger than 6.0.
5. All references to service life are in Effective Full Power Years.
6. Results are only provided for the uphill and downhill sides of the selected penetration nozzles. If flaws are found in locations between the uphill and downhill side, use the results for either the uphill or downhill location, whichever is closer.

Table 7-1 Example Problem Inputs: Initial Flaw Sizes and Locations

Example No.	Orientation	Vertical Location	Circumferential Location	Penetration Row	Length	Depth	Penetration No.	Source Figure
1	Axial - Inside Surface	1.25" Below Weld	Uphill	26.2°	0.195"	0.078"	30	6-2
2	Axial - Outside Surface	1.25" Below Weld	Downhill	26.2°	0.195"	0.078"	30	6-10
3	Axial - Inside Surface	At Weld	Downhill	48.7°	0.250"	0.05"	79	6-5
4	Axial - Inside Surface	1.0" Below Weld	Uphill	48.7°	0.395"	0.079"	79	6-2, 6-4
5	Axial Through-Wall	0.40" Below Weld	Downhill	26.2°	--	--	33	6-13

Example No.	Orientation	Crack Tip Location	Circumferential Location	Penetration Row	Length (2c)	Depth (a)	Wall Thickness	a/t	Penetration No.	Source Figure
1	Axial – Inside Surface	1.25" Below Weld	Uphill	26.2°	0.195"	0.078"	0.625"	0.125	30	6-2

Locality Angle from Table 1-1:

Nozzle No.	Angle
30	26.2

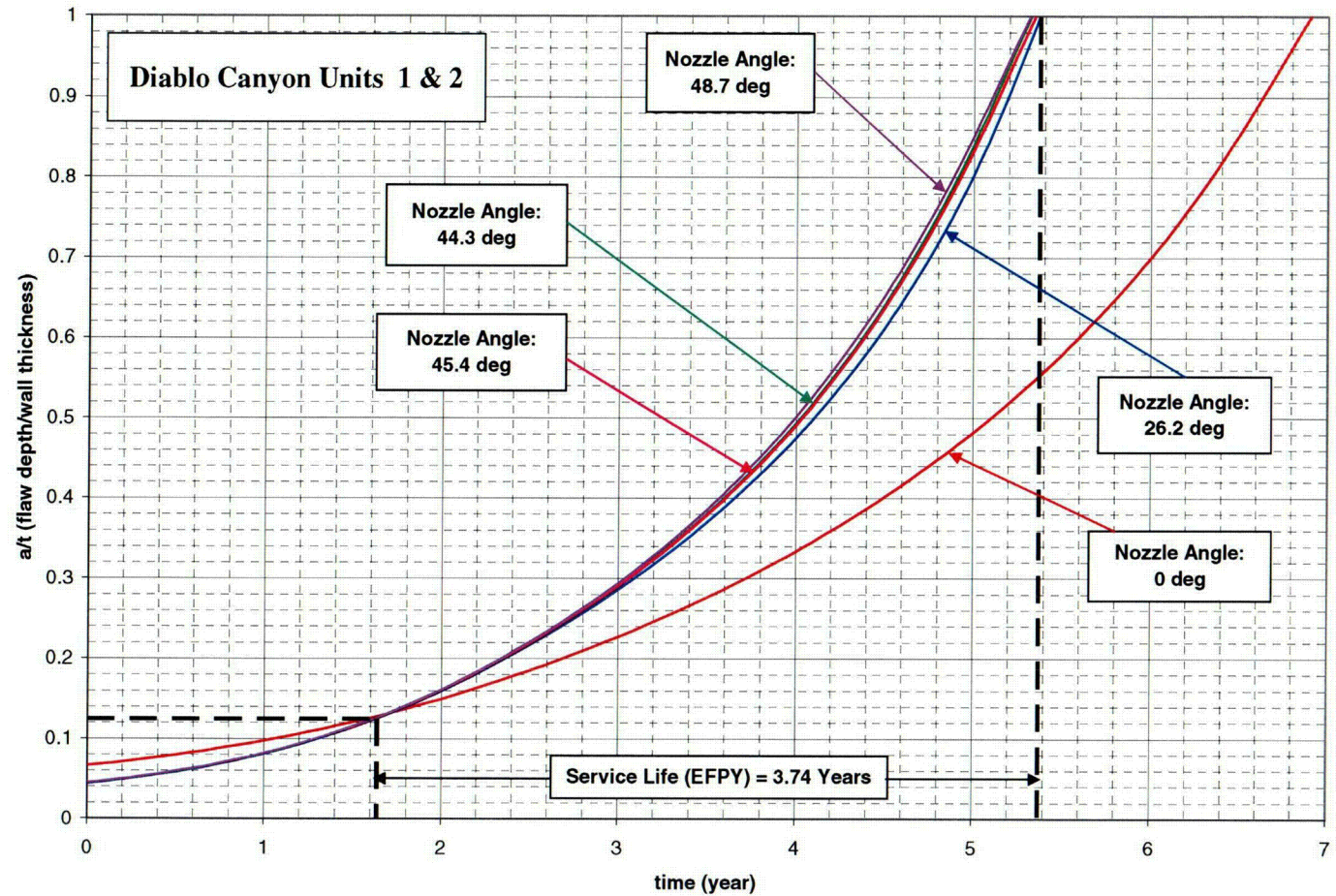
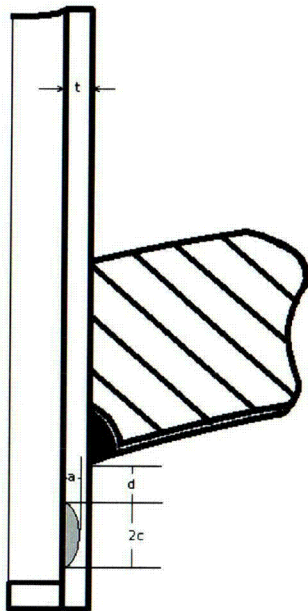


Figure 7-1 Example Problem 1

Example No.	Orientation	Crack Tip Location	Circumferential Location	Penetration Row	Length (2c)	Depth (a)	Wall Thickness	a/t	Penetration No.	Source Figure
2	Axial – Outside Surface	1.25" Below Weld	Downhill	26.2°	0.195"	0.078"	0.625"	0.125	30	6-10

Locality Angle from Table 1-1:

Nozzle No.	Angle
30	26.2

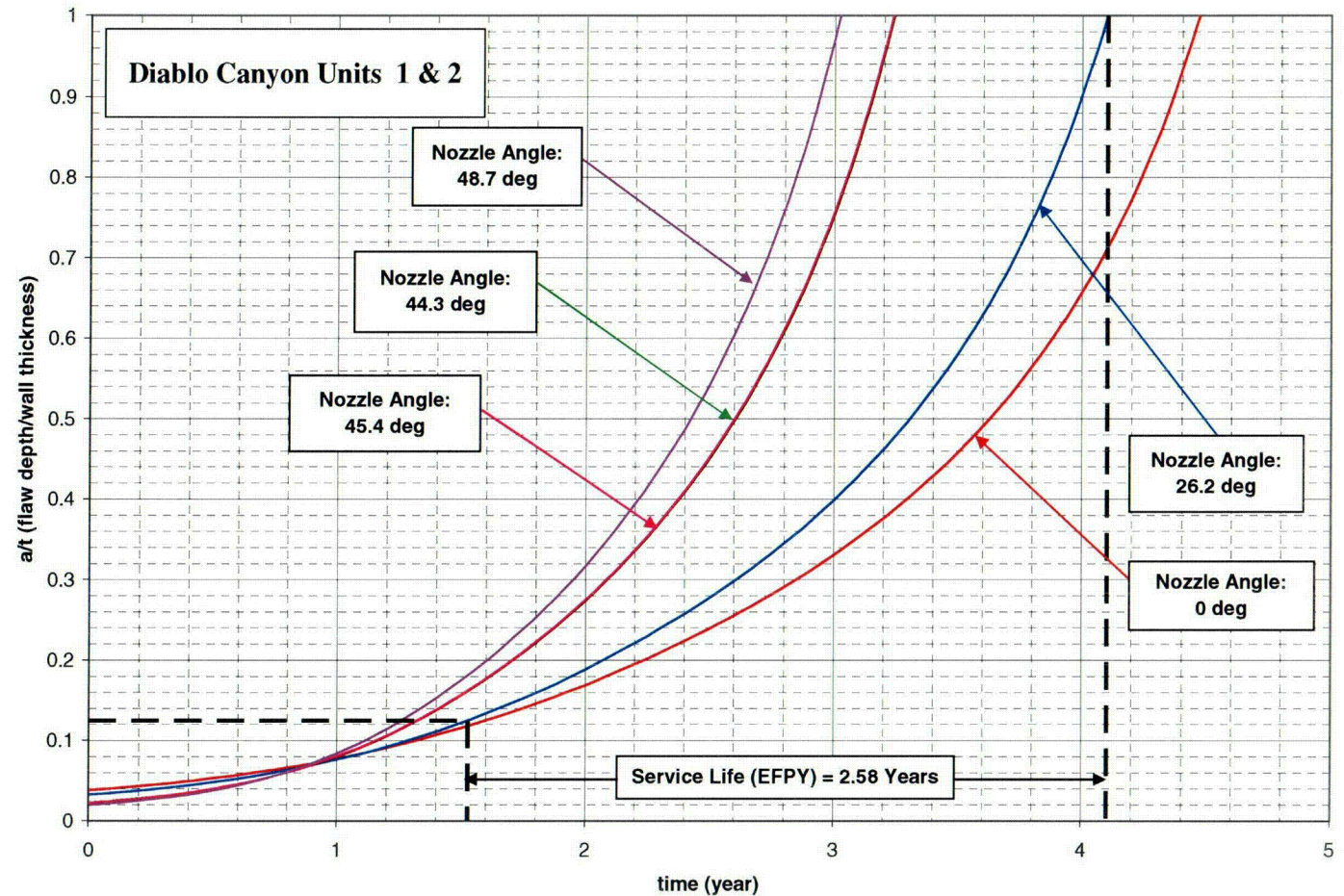
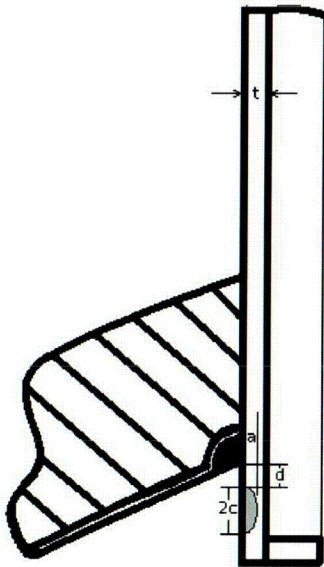


Figure 7-2 Example Problem 2

Example No.	Orientation	Crack Tip Location	Circumferential Location	Penetration Row	Length (2c)	Depth (a)	Wall Thickness	a/t	Penetration No.	Source Figure
3	Axial – Inside Surface	At Weld	Downhill	48.7°	0.250"	0.05"	0.625"	0.08	79	6-5

Locality Angle from Table 1-1:

Nozzle No.	Angle
79	48.7

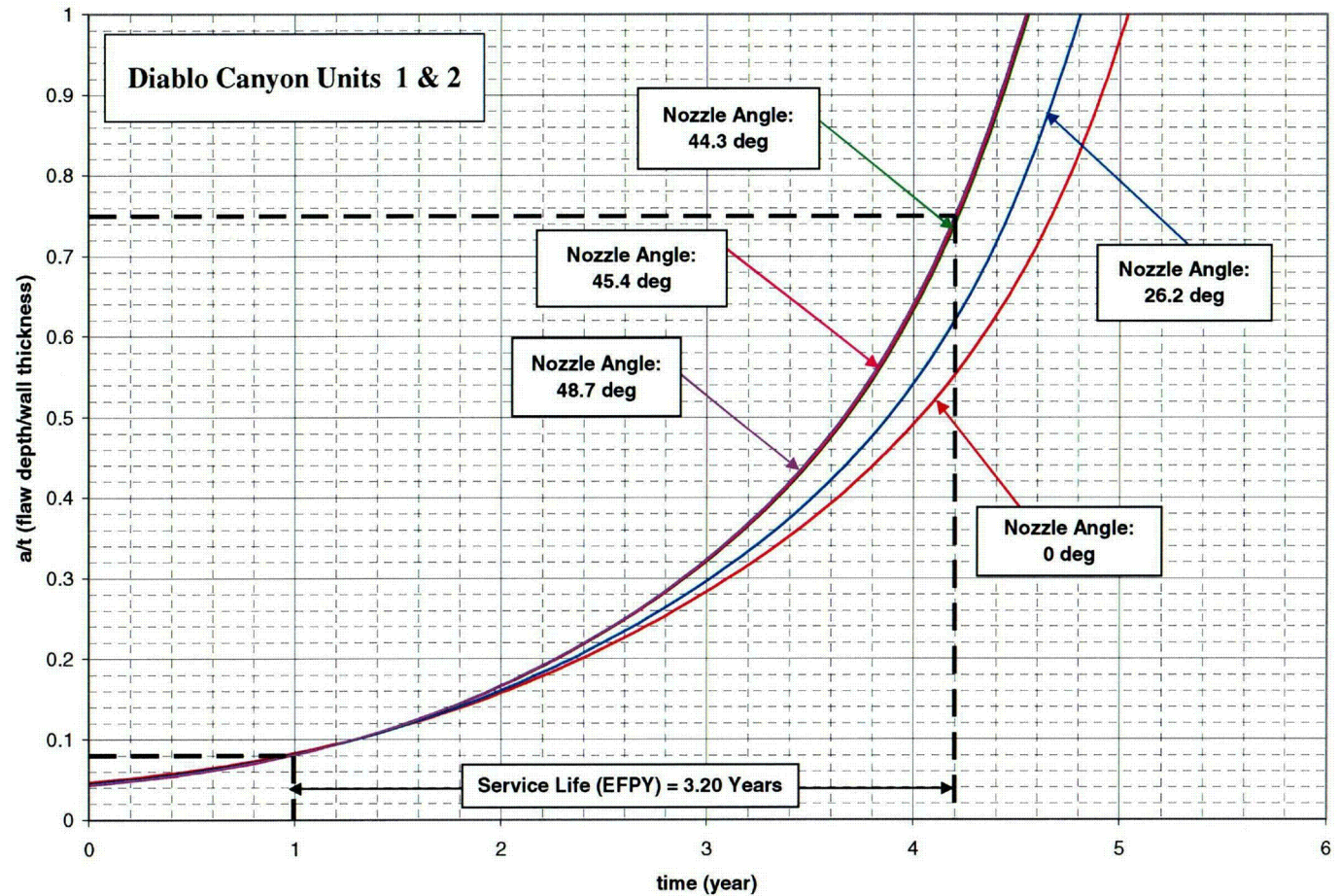
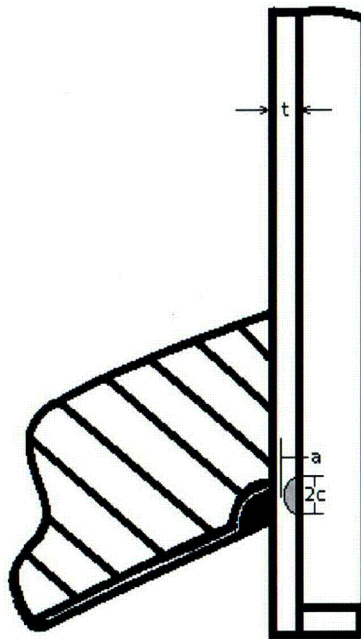


Figure 7-3 Example Problem 3

Example No.	Orientation	Crack Tip Location	Circumferential Location	Penetration Row	Length (2c)	Depth (a)	Wall Thickness	a/t	Penetration No.	Source Figure
4	Axial – Inside Surface	1.00" Below Weld	Uphill	48.7°	0.395"	0.079"	0.625"	0.126	79	6-2, 6-4

Locality Angle from Table 1-1:

Nozzle No.	Angle
79	48.7

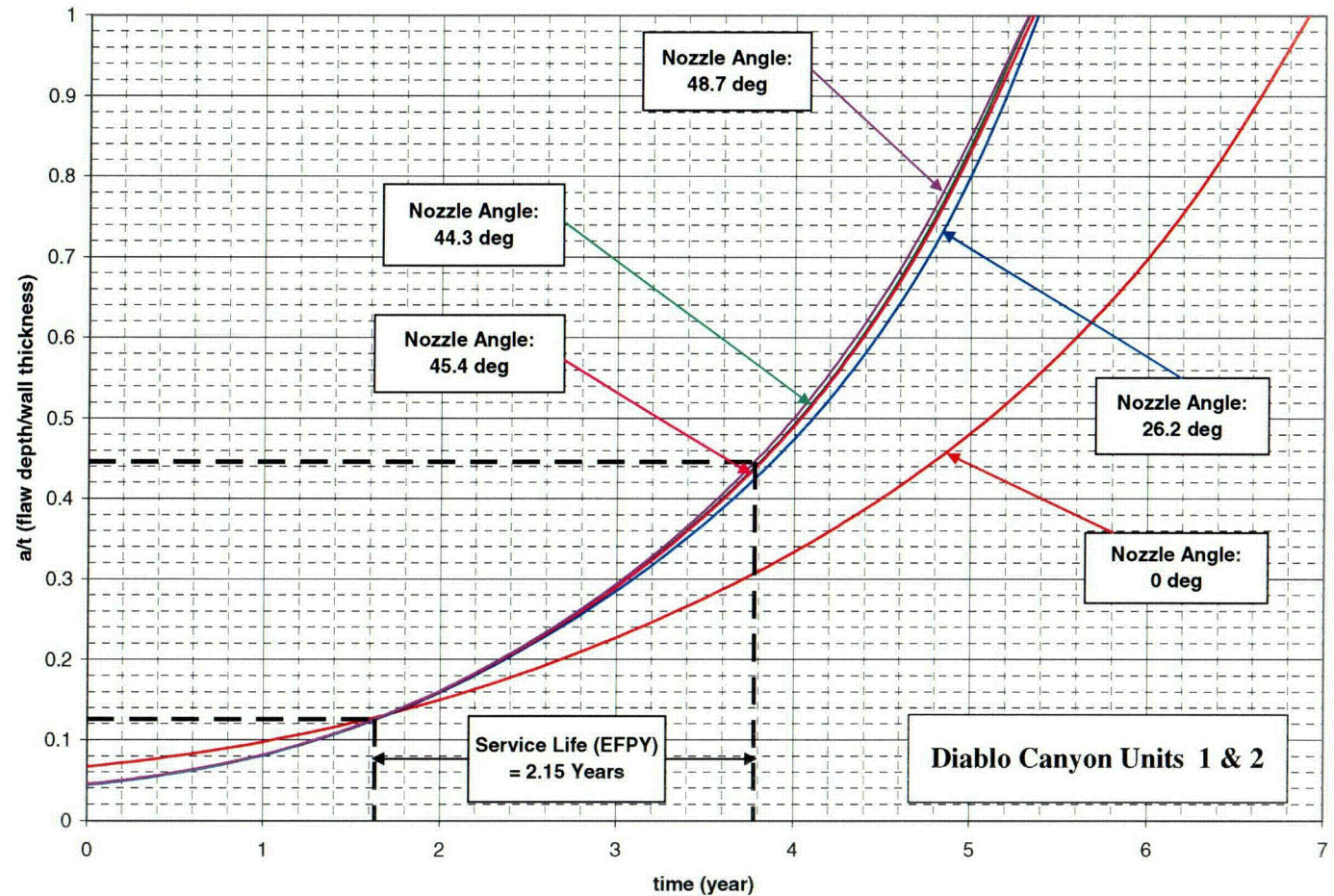
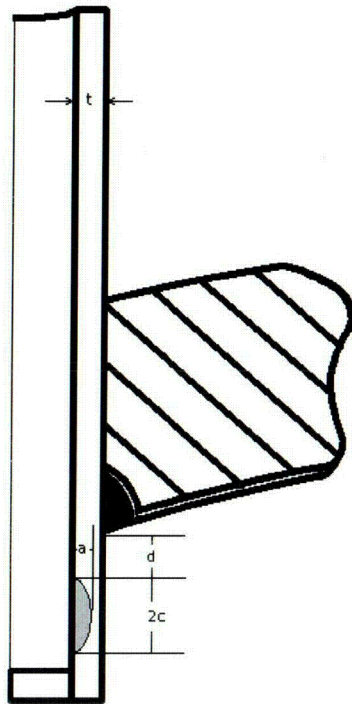


Figure 7-4a Example Problem 4 (See also Figure 7-4b)

Example No.	Orientation	Crack Tip Location	Circumferential Location	Penetration Row	Length (2c)	Depth (a)	Wall Thickness	a/t	Penetration No.	Source Figure
4	Axial – Inside Surface	1.00" Below Weld	Uphill	48.7°	0.395"	0.079"	0.625"	0.126	79	6-2, 6-4

Locality Angle from Table 1-1:

Nozzle No.	Angle
79	48.7

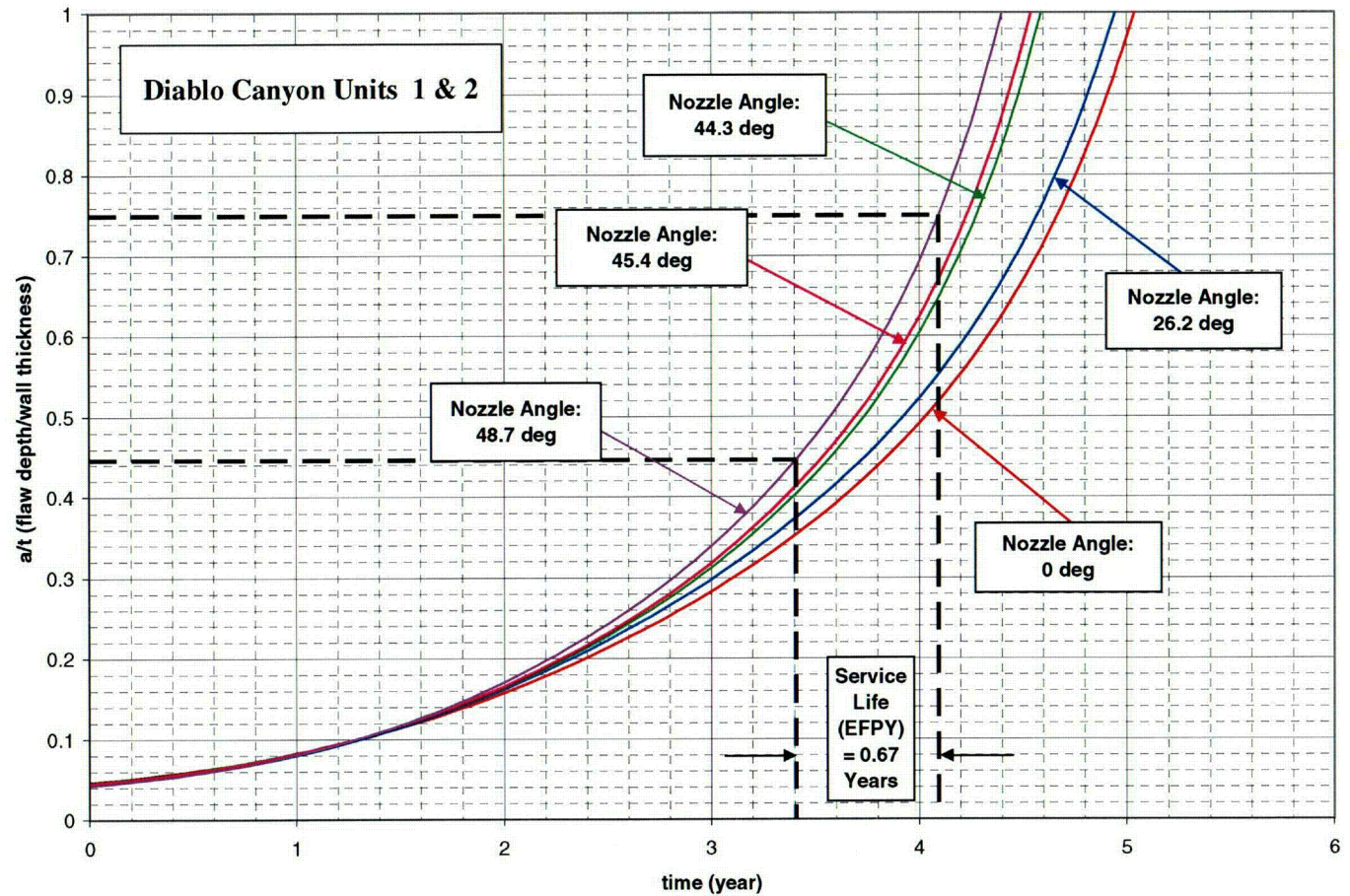
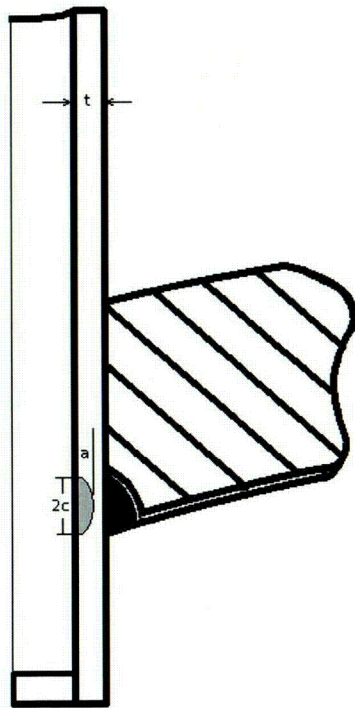


Figure 7-4b Example Problem 4 (See also Figure 7-4a)

Example No.	Orientation	Crack Tip Location	Circumferential Location	Penetration Row	Length (2c)	Depth (a)	Wall Thickness	a/t	Penetration No.	Source Figure
5	Axial – Through-Wall	0.4" Below Weld	Downhill	26.2°	N/A	N/A	0.625"	N/A	33	6-13

Locality Angle from Table 1-1:

Nozzle No.	Angle
33	26.2

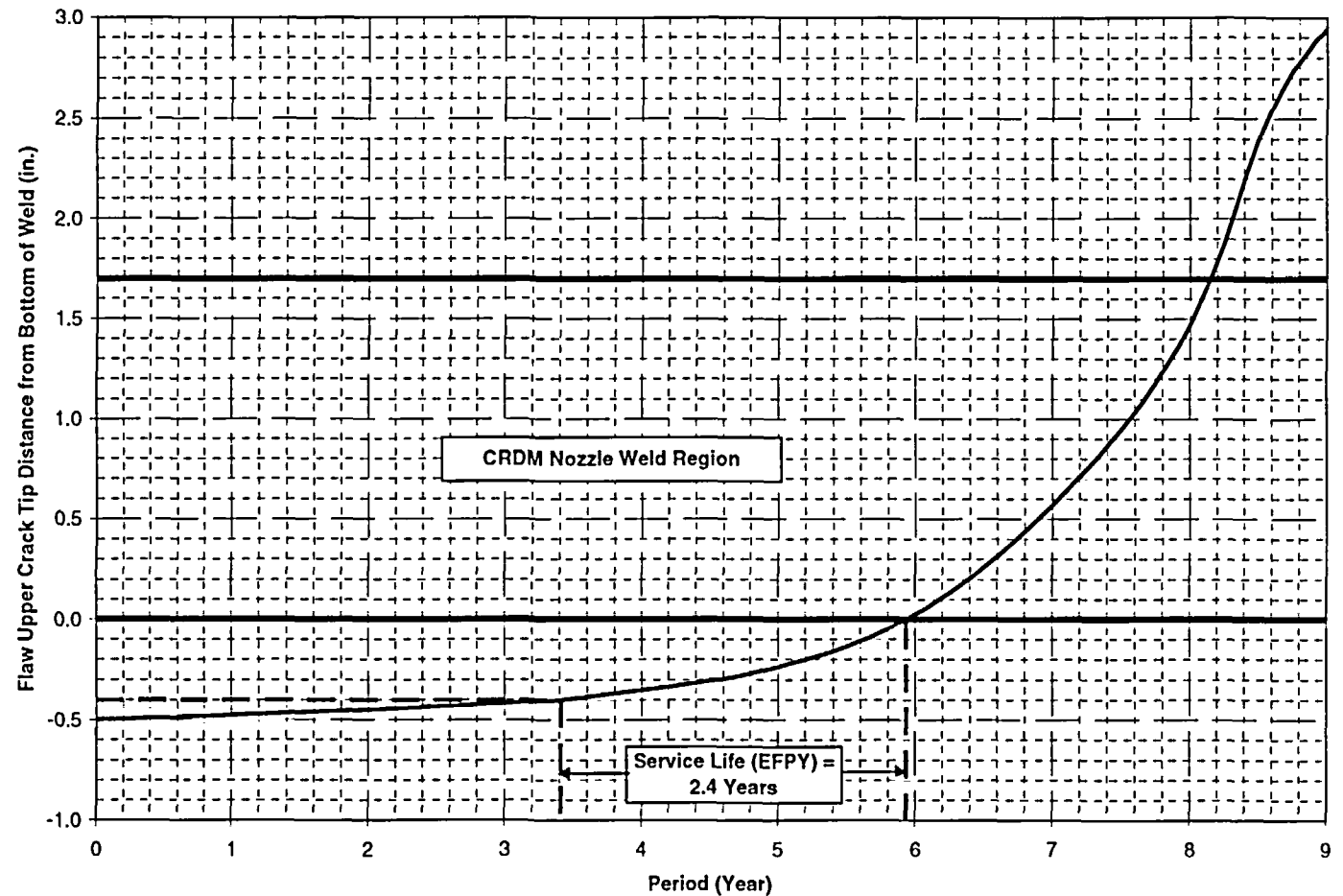
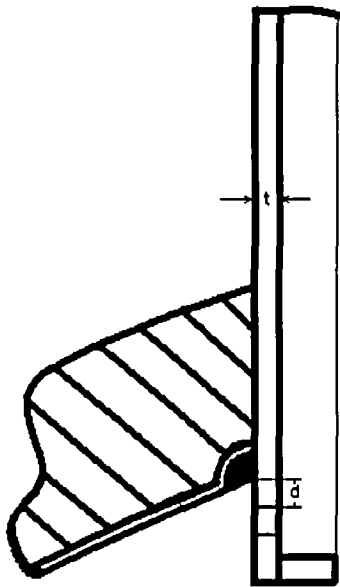


Figure 7-5 Example Problem 5

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- 1C. CE Drawing No. E-232-446, Revision 6, "Closure Head Forming & Welding for Westinghouse Electric Corp. 173" I.D. Reactor Vessel" (Unit 1).
- 1D. CE Drawing No. E-232-051, Revision 4, "Control Rod Mechanism Housing Details for Westinghouse Electric Corp. 173" I.D. Reactor Vessel" (Unit 1).
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APPENDIX A

CRDM HOOP STRESS DISTRIBUTIONS BELOW THE WELD

In this section, the CRDM hoop stress distributions below the weld are plotted for the center penetration, 26.2°, 44.3°, 45.4°, and 48.7° penetration rows on both the downhill and uphill sides. The information presented in this Appendix can be used to determine the extent of inspection coverage needed in order to meet the NRC Order EA-03-009 requirements or facilitate the submittal of relaxation requests in the event that the NRC order requirements cannot be met.

Figure A-1
Hoop Stress Distribution Downhill and Uphill Side
(0° CRDM Penetration Nozzle)

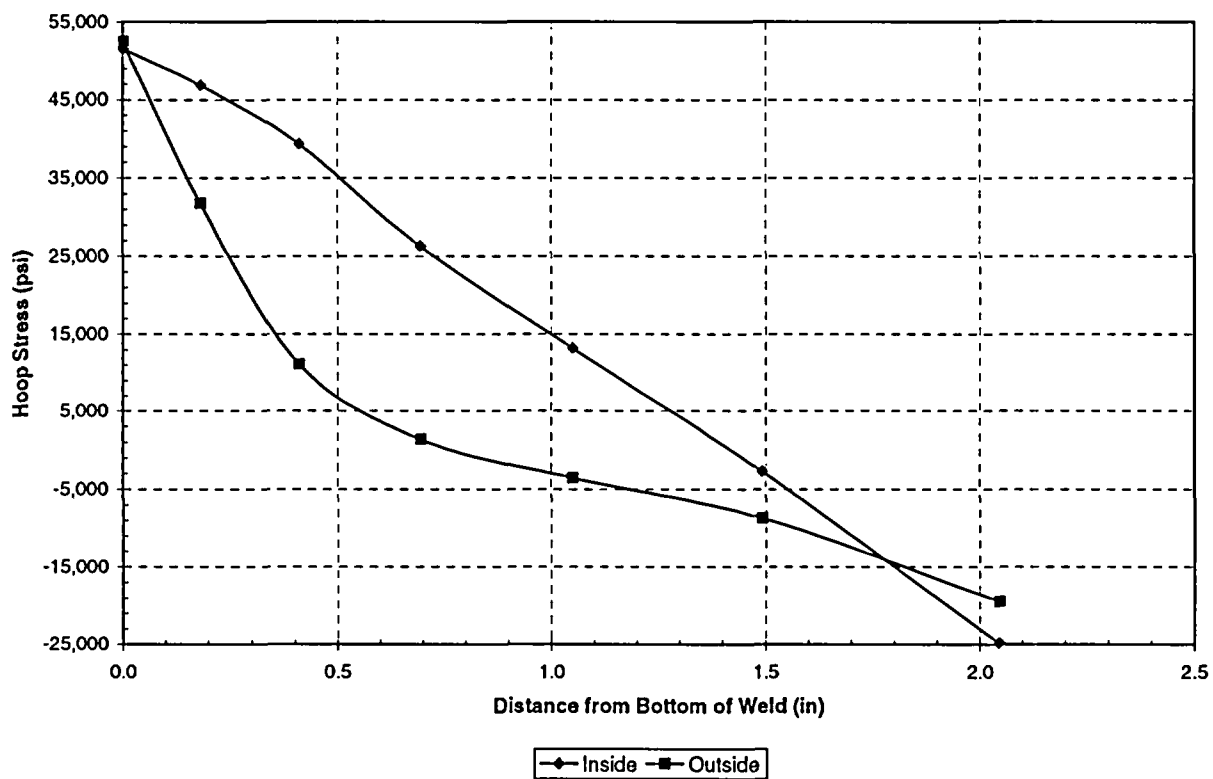


Figure A-2
Hoop Stress Distribution Downhill Side
(26.2° CRDM Penetration Nozzle)

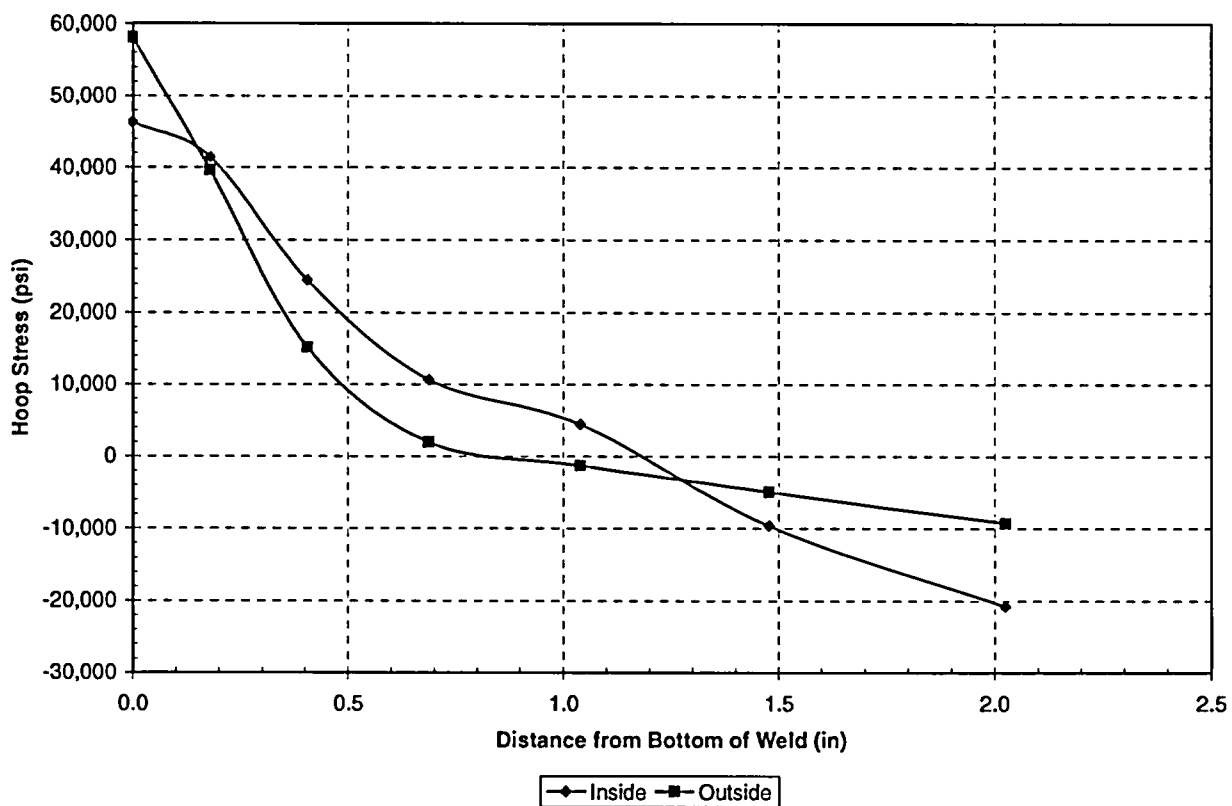


Figure A-3
Hoop Stress Distribution Uphill Side
(26.2° CRDM Penetration Nozzle)

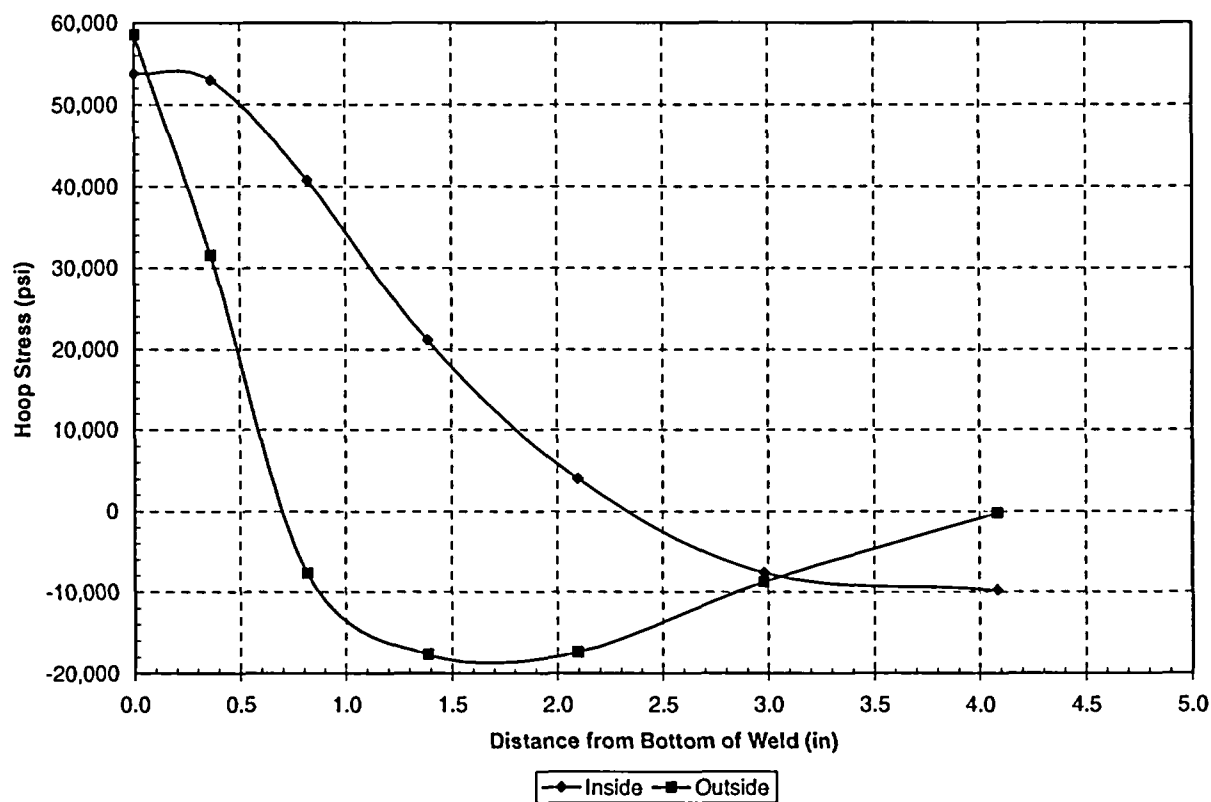


Figure A-4
Hoop Stress Distribution Downhill Side
(44.3° CRDM Penetration Nozzle)

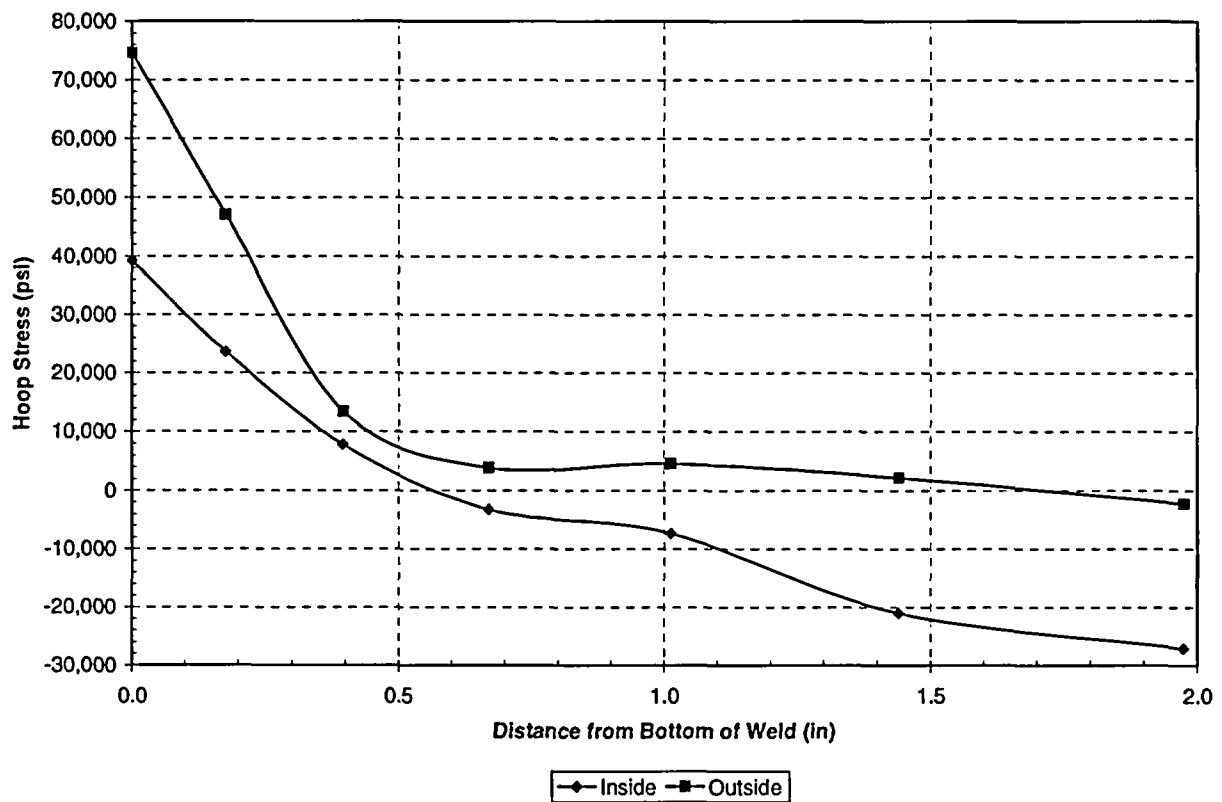


Figure A-5
Hoop Stress Distribution Uphill Side
(44.3° CRDM Penetration Nozzle)

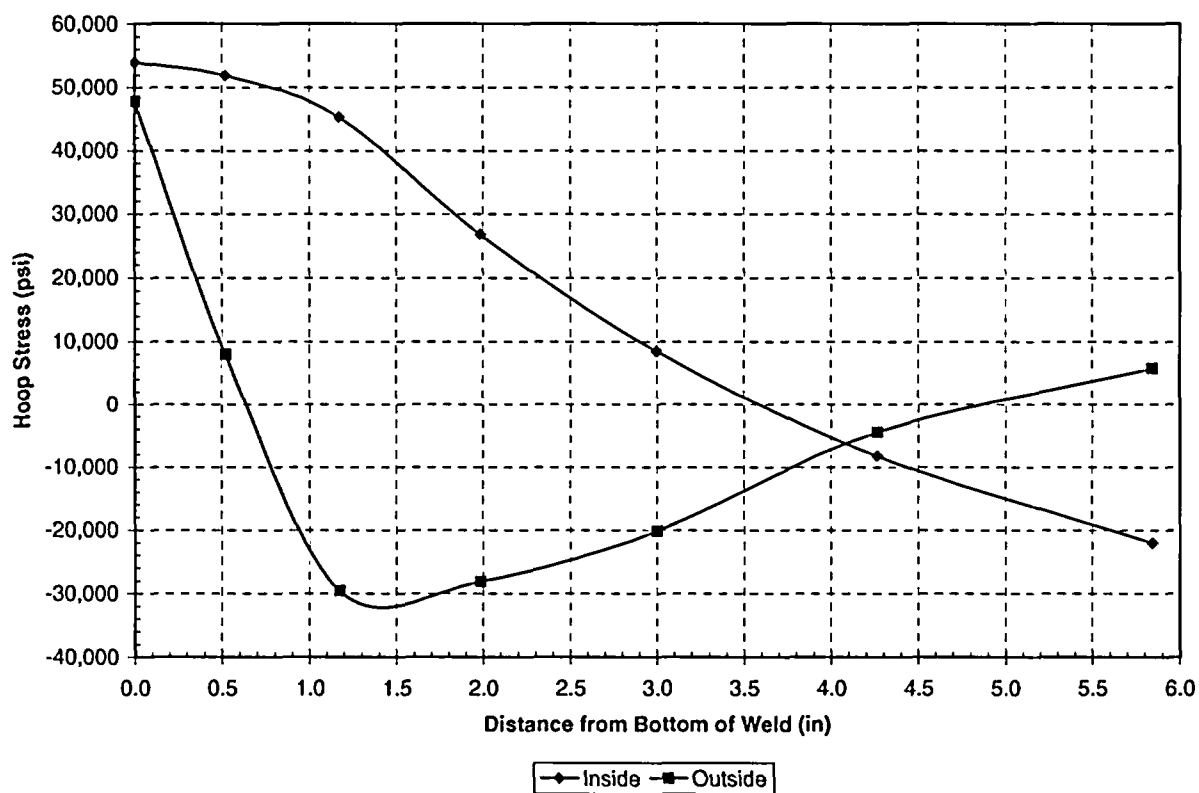


Figure A-6
Hoop Stress Distribution Downhill Side
(45.4° CRDM Penetration Nozzle)

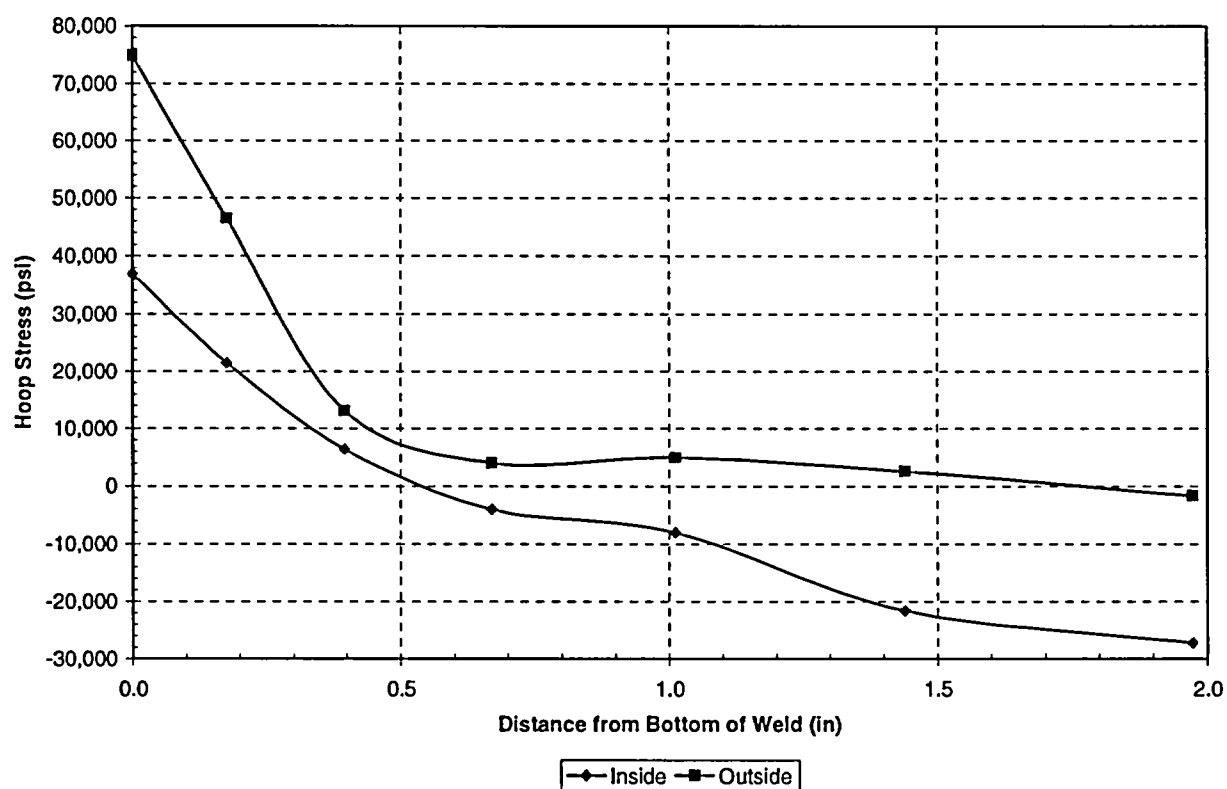


Figure A-7
Hoop Stress Distribution Uphill Side
(45.4° CRDM Penetration Nozzle)

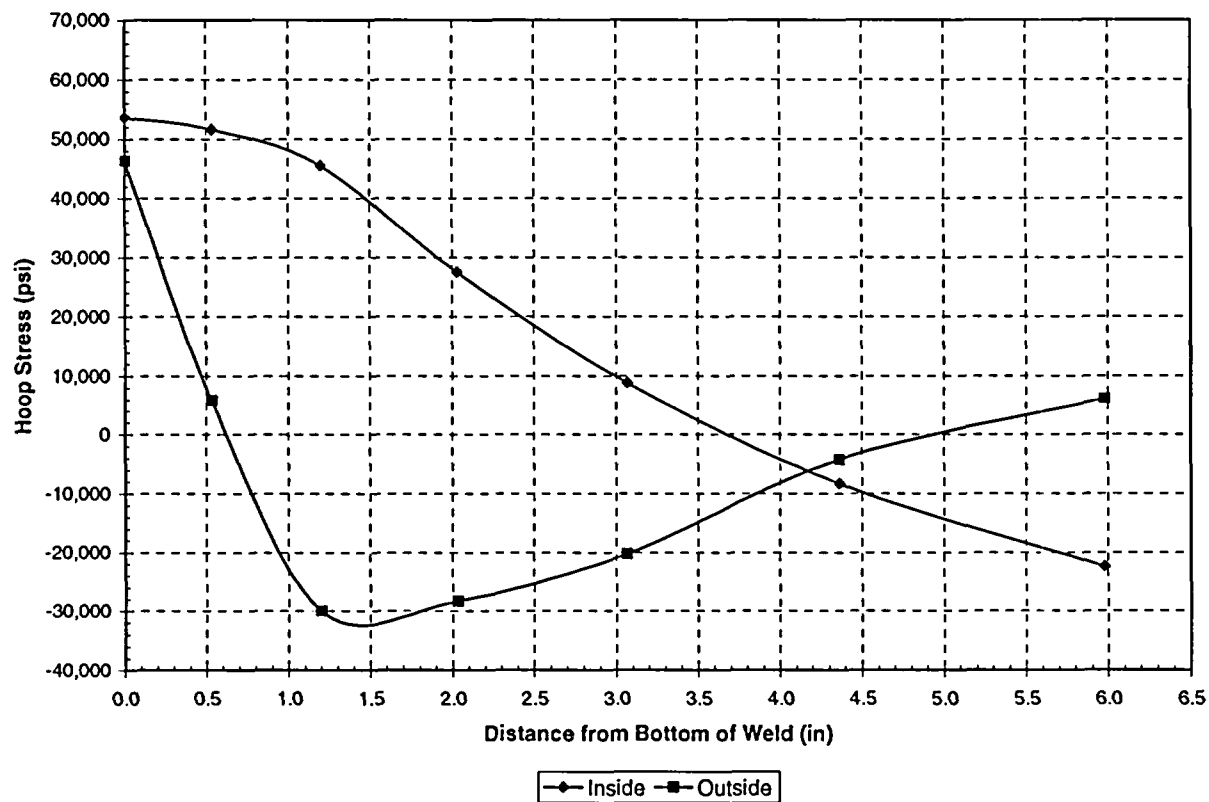


Figure A-8
Hoop Stress Distribution Downhill Side
(48.7° CRDM Penetration Nozzle)

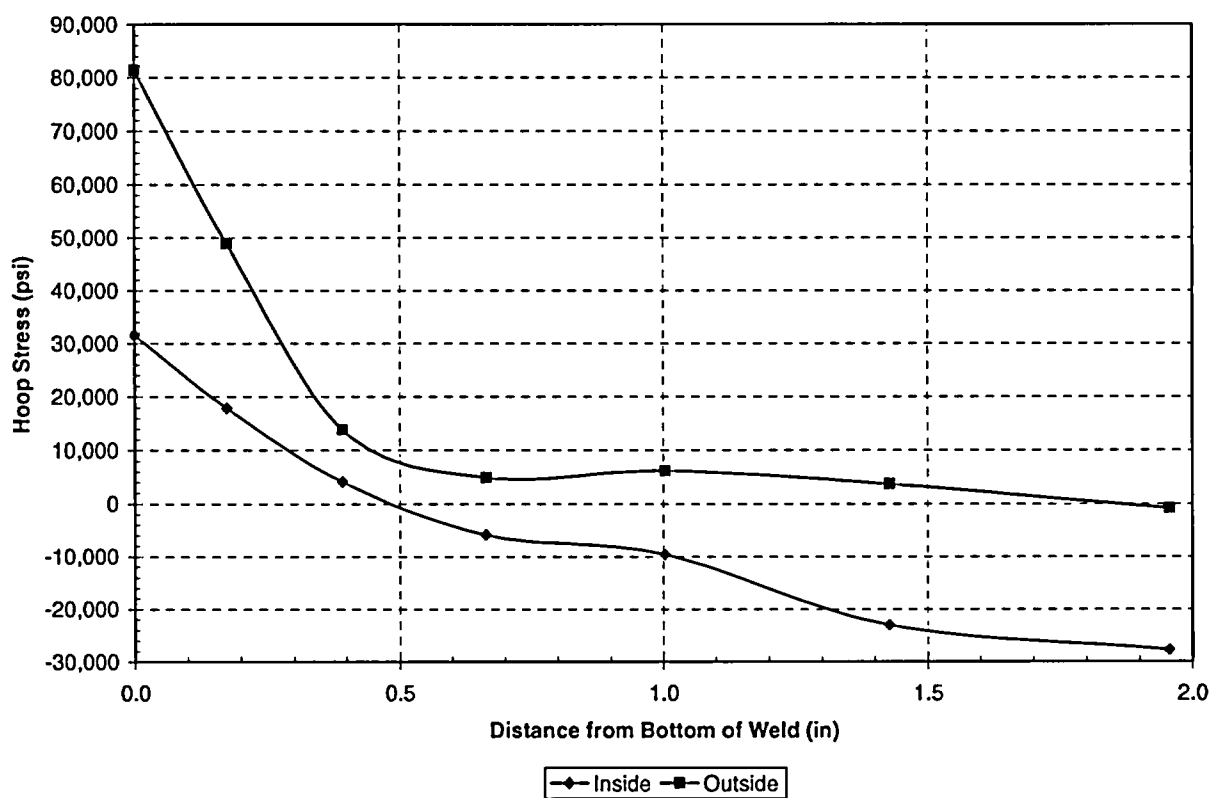
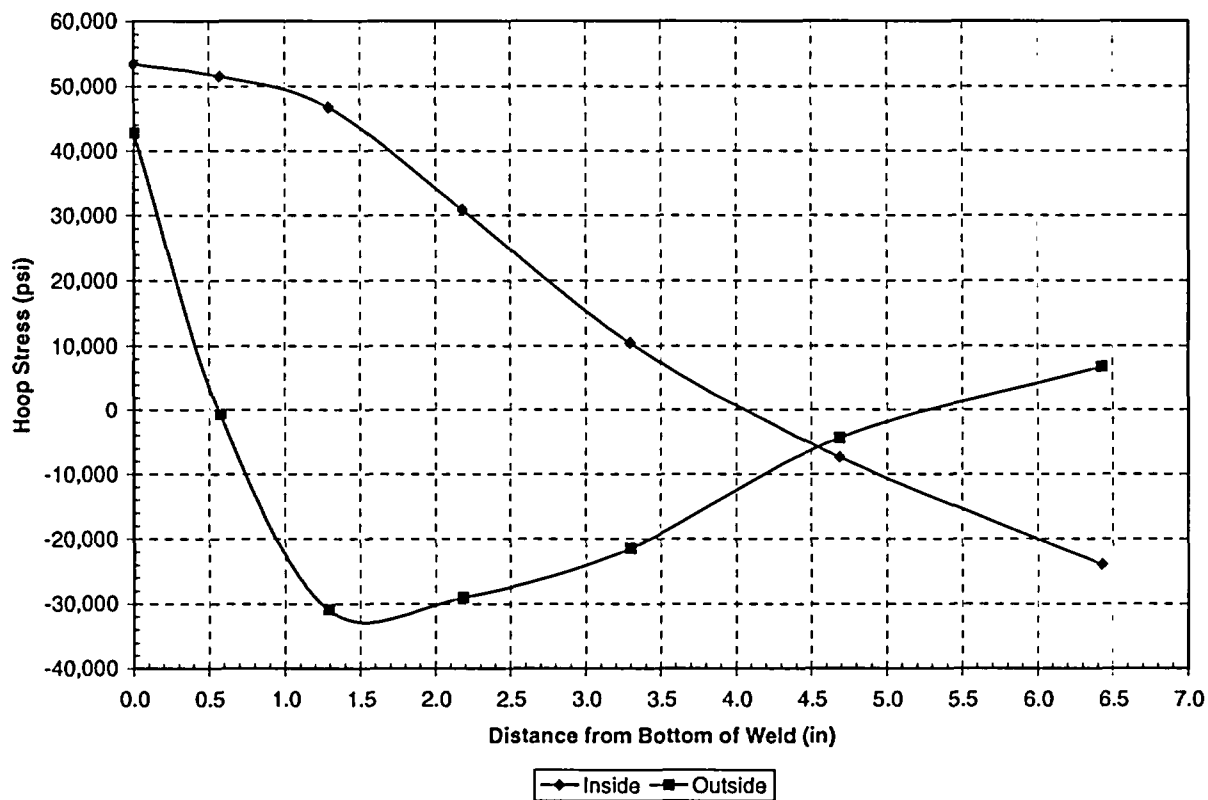


Figure A-9
Hoop Stress Distribution Uphill Side
(48.7° CRDM Penetration Nozzle)



Enclosure 4
PG&E Letter DCL-04-146

Westinghouse Proprietary Affidavit, Proprietary Information Notice,
and Copyright Notice



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Our ref: CAW-04-1895

September 23, 2004

APPLICATION FOR WITHHOLDING PROPRIETARY
INFORMATION FROM PUBLIC DISCLOSURE

Subject: WCAP-15429-P, Revision 0, "Structural Integrity Evaluation of Reactor Vessel Upper Head Penetrations to Support Continued Operation: Diablo Canyon Units 1 and 2," September 2004 (Proprietary)

The proprietary information for which withholding is being requested in the above-referenced report is further identified in Affidavit CAW-04-1895 signed by the owner of the proprietary information, Westinghouse Electric Company LLC. The affidavit, which accompanies this letter, sets forth the basis on which the information may be withheld from public disclosure by the Commission and addresses with specificity the considerations listed in paragraph (b)(4) of 10 CFR Section 2.390 of the Commission's regulations.

Accordingly, this letter authorizes the utilization of the accompanying affidavit by Pacific Gas and Electric Company.

Correspondence with respect to the proprietary aspects of the application for withholding or the Westinghouse affidavit should reference this letter, CAW-04-1895, and should be addressed to J. A. Gresham, Manager, Regulatory Compliance and Plant Licensing, Westinghouse Electric Company LLC, P.O. Box 355, Pittsburgh, Pennsylvania 15230-0355.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. A. Gresham'.

J. A. Gresham, Manager
Regulatory Compliance and Plant Licensing

Enclosures

cc: W. Macon
E. Peyton

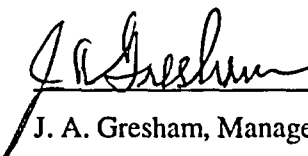
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA:

ss

COUNTY OF ALLEGHENY:

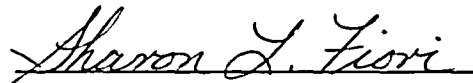
Before me, the undersigned authority, personally appeared J. A. Gresham, who, being by me duly sworn according to law, deposes and says that he is authorized to execute this Affidavit on behalf of Westinghouse Electric Company LLC (Westinghouse), and that the averments of fact set forth in this Affidavit are true and correct to the best of his knowledge, information, and belief:



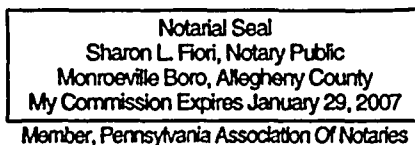
J. A. Gresham, Manager

Regulatory Compliance and Plant Licensing

Sworn to and subscribed
before me this 29th day
of September, 2004



Notary Public



- (1) I am Manager, Regulatory Compliance and Plant Licensing, in Nuclear Services, Westinghouse Electric Company LLC (Westinghouse), and as such, I have been specifically delegated the function of reviewing the proprietary information sought to be withheld from public disclosure in connection with nuclear power plant licensing and rule making proceedings, and am authorized to apply for its withholding on behalf of Westinghouse.
- (2) I am making this Affidavit in conformance with the provisions of 10 CFR Section 2.390 of the Commission's regulations and in conjunction with the Westinghouse "Application for Withholding" accompanying this Affidavit.
- (3) I have personal knowledge of the criteria and procedures utilized by Westinghouse in designating information as a trade secret, privileged or as confidential commercial or financial information.
- (4) Pursuant to the provisions of paragraph (b)(4) of Section 2.390 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure should be withheld.
 - (i) The information sought to be withheld from public disclosure is owned and has been held in confidence by Westinghouse.
 - (ii) The information is of a type customarily held in confidence by Westinghouse and not customarily disclosed to the public. Westinghouse has a rational basis for determining the types of information customarily held in confidence by it and, in that connection, utilizes a system to determine when and whether to hold certain types of information in confidence. The application of that system and the substance of that system constitutes Westinghouse policy and provides the rational basis required.

Under that system, information is held in confidence if it falls in one or more of several types, the release of which might result in the loss of an existing or potential competitive advantage, as follows:

- (a) The information reveals the distinguishing aspects of a process (or component, structure, tool, method, etc.) where prevention of its use by any of

Westinghouse's competitors without license from Westinghouse constitutes a competitive economic advantage over other companies.

- (b) It consists of supporting data, including test data, relative to a process (or component, structure, tool, method, etc.), the application of which data secures a competitive economic advantage, e.g., by optimization or improved marketability.
- (c) Its use by a competitor would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing a similar product.
- (d) It reveals cost or price information, production capacities, budget levels, or commercial strategies of Westinghouse, its customers or suppliers.
- (e) It reveals aspects of past, present, or future Westinghouse or customer funded development plans and programs of potential commercial value to Westinghouse.
- (f) It contains patentable ideas, for which patent protection may be desirable.

There are sound policy reasons behind the Westinghouse system which include the following:

- (a) The use of such information by Westinghouse gives Westinghouse a competitive advantage over its competitors. It is, therefore, withheld from disclosure to protect the Westinghouse competitive position.
- (b) It is information that is marketable in many ways. The extent to which such information is available to competitors diminishes the Westinghouse ability to sell products and services involving the use of the information.
- (c) Use by our competitor would put Westinghouse at a competitive disadvantage by reducing his expenditure of resources at our expense.

- (d) Each component of proprietary information pertinent to a particular competitive advantage is potentially as valuable as the total competitive advantage. If competitors acquire components of proprietary information, any one component may be the key to the entire puzzle, thereby depriving Westinghouse of a competitive advantage.
 - (e) Unrestricted disclosure would jeopardize the position of prominence of Westinghouse in the world market, and thereby give a market advantage to the competition of those countries.
 - (f) The Westinghouse capacity to invest corporate assets in research and development depends upon the success in obtaining and maintaining a competitive advantage.
- (iii) The information is being transmitted to the Commission in confidence and, under the provisions of 10 CFR Section 2.390, it is to be received in confidence by the Commission.
- (iv) The information sought to be protected is not available in public sources or available information has not been previously employed in the same original manner or method to the best of our knowledge and belief.
- (v) The proprietary information sought to be withheld in this submittal is that which is appropriately marked in WCAP-15429-P, Revision 0, "Structural Integrity Evaluation of Reactor Vessel Upper Head Penetrations to Support Continued Operation: Diablo Canyon Units 1 and 2," September 2004 (Proprietary) being transmitted by the Pacific Gas and Electric Company letter and Application for Withholding Proprietary Information from Public Disclosure, to the Document Control Desk. The proprietary information as submitted for use by Westinghouse for Diablo Canyon Units 1 and 2 is expected to be applicable for other licensee submittals in response to certain NRC requirements for justification of the use of fracture mechanics analyses to support continued safe operation of Diablo Canyon Unit 1 or 2 with the presence of a crack in a control rod drive head penetration.

This information is part of that which will enable Westinghouse to:

- (a) Determine the allowable time of safe operation if cracks are found.
- (b) Assist the customer to obtain NRC approval.

Further this information has substantial commercial value as follows:

- (a) Westinghouse plans to sell the use of similar information to its customers for purposes of meeting NRC requirements for licensing documentation.
- (b) Westinghouse can sell support and defense of continued safe operation with the presence of cracks in a control rod drive head penetration.

Public disclosure of this proprietary information is likely to cause substantial harm to the competitive position of Westinghouse because it would enhance the ability of competitors to provide similar support documentation and licensing defense services for commercial power reactors without commensurate expenses. Also, public disclosure of the information would enable others to use the information to meet NRC requirements for licensing documentation without purchasing the right to use the information.

The development of the technology described in part by the information is the result of applying the results of many years of experience in an intensive Westinghouse effort and the expenditure of a considerable sum of money.

In order for competitors of Westinghouse to duplicate this information, similar technical programs would have to be performed and a significant manpower effort, having the requisite talent and experience, would have to be expended.

Further the deponent sayeth not.

PROPRIETARY INFORMATION NOTICE

Transmitted herewith are proprietary and/or non-proprietary versions of documents furnished to the NRC in connection with requests for generic and/or plant-specific review and approval.

In order to conform to the requirements of 10 CFR 2.390 of the Commission's regulations concerning the protection of proprietary information so submitted to the NRC, the information which is proprietary in the proprietary versions is contained within brackets, and where the proprietary information has been deleted in the non-proprietary versions, only the brackets remain (the information that was contained within the brackets in the proprietary versions having been deleted). The justification for claiming the information so designated as proprietary is indicated in both versions by means of lower case letters (a) through (f) located as a superscript immediately following the brackets enclosing each item of information being identified as proprietary or in the margin opposite such information. These lower case letters refer to the types of information Westinghouse customarily holds in confidence identified in Sections (4)(ii)(a) through (4)(ii)(f) of the affidavit accompanying this transmittal pursuant to 10 CFR 2.390(b)(1).

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