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Revision 0

Flaw Tolerance Evaluation to Support Re-categorization of V. C. Summer Unit 1 Steam Generator Nozzle to Safe End Dissimilar Metal Weld Inspection Requirements

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1.0 INTRODUCTION

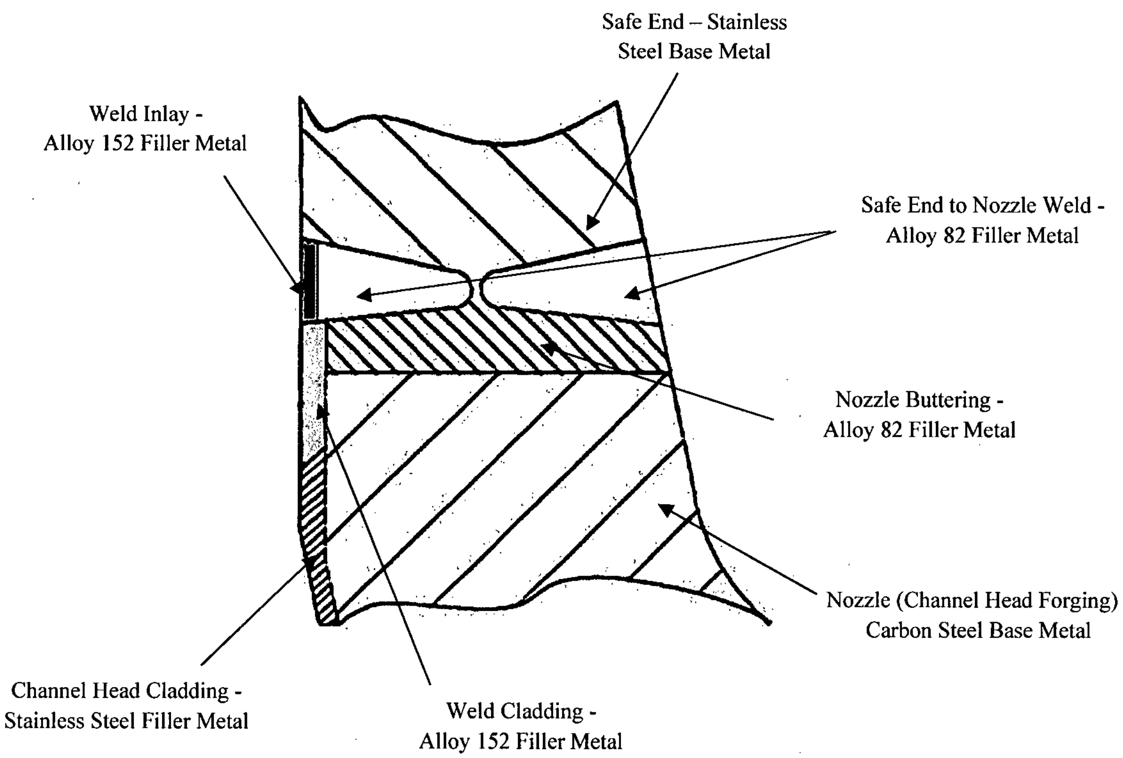
The V. C. Summer Unit 1 replacement steam generators were fabricated with factory welded forged stainless steel safe ends attached to the primary inlet and outlet nozzles with Alloy 82 welds (Figure 1-1). The Alloy 82 weld material is sealed with Alloy 152 cladding on the steam generator channel head integral nozzle inside diameter (including the Alloy 82 weld deposited buttering) and also with Alloy 152 inlay on the inside surface of the dissimilar metal (DM) nozzle to safe end welds (Reference 1). The nominal thicknesses for the Alloy 152 cladding and Alloy 152 weld inlay are 0.25 inch and 0.13 inch respectively (Reference 2). The Alloy 152 weld material provides a barrier to isolate the Primary Water Stress Corrosion Cracking (PWSCC) susceptible Alloy 82 weld material from the primary water environment.

According to the examination requirements of ASME Code Case N-770-1 (Reference 3), these DM weld regions must be inspected at a higher frequency than the 10 year frequency normally required by ASME Section XI even though they were manufactured in a factory controlled environment in 1994 before Code Case N-770-1 was made mandatory. The required inspection frequencies for the replacement steam generator inlet nozzle and outlet nozzle DM welds are 5 years and 7 years respectively in accordance with ASME Code Case N-770-1.

Since the DM welds of these steam generator nozzles do not have susceptible material exposed to the primary water environment because of the Alloy 152 weld inlay/cladding on the inside surface, it would be appropriate to re-categorize them as Inspection Item G "Un-cracked butt weld mitigated with an inlay" according to the Code Case. The DM welds for these nozzles are currently being categorized as Inspection Items A-2 and B as "unmitigated butt welds" in accordance with Code Case N-770-1. In order to support the re-categorization, a number of specific items must be addressed. These items (a total of 12) were specified in a response to public question number 29, shown in Appendix A of this report, which was received during a public meeting on Code Case N-770-1 implementation. The primary objective of this letter report is to provide the technical basis for re-categorizing the DM welds of these replacement steam generator primary nozzles. The following sections provide a discussion of the methodology, geometry, loading and the crack growth analysis performed to demonstrate the integrity of the Steam Generator inlet and outlet nozzle DM weld inlays. The crack growth analysis provides a treatment of the potential for PWSCC in the Alloy 152 weld inlay, corresponding to Items 11 and 12 in the public question response shown in Appendix A of this report.

Figure 1-1

V. C. Summer Unit 1 Replacement Steam Generator
Inlet/Outlet Nozzle to Safe End Dissimilar Metal Weld Configuration



2.0 METHODOLOGY

In order to demonstrate adequacy of the Steam Generator inlet and outlet nozzle DM weld inlay thickness against PWSCC, it is necessary to perform a crack growth analysis by postulating a flaw in the inlay. The size of the flaw was assumed to be that which might go undetected during the upcoming baseline inspection in 2014. The results of the crack growth analysis can be used to determine a lower bound service life required for the postulated flaw to grow through the thickness of the Alloy 152 weld inlay when subjected to PWSCC crack growth mechanism. The service life required to grow through the Alloy 152 weld inlay should be more than 10 Effective Full Power Years since the required examination interval is 10 years for Inspection Item G in accordance with Code Case N-770-1.

In order to perform the crack growth analysis, it is necessary to establish the stresses, crack geometry and the material properties at the locations of interest. The applicable loadings which must be considered consist of piping reaction loads acting at the dissimilar metal weld regions and the welding residual stresses which exist in the region of interest. The plant specific piping loads at the steam generator primary nozzle DM weld locations were based on the latest reactor coolant loop piping analysis of record (Reference 4). In addition to the piping loads, the effects of welding residual stresses (Reference 5) due to the fabrication process of the steam generator nozzle DM welds are also considered. For PWSCC, the crack growth model for the Alloy 152 weld inlay material is based on that given in MRP-115 (Reference 6) for Alloy 182 weld material with an improvement factor of 100. This improvement factor, although higher than that recommended in the public question response shown in Appendix A, is a more accurate improvement factor for Alloy 152 based on the reported data documented in NUREG/CR-7103 (Reference 7) as well as those from GE Global Research (Reference 8). A more detailed discussion of the improvement factor is provided in Section 5.0.

The nozzle geometry and piping loads used in the crack growth analysis are shown in Section 3.0. A discussion of the plant specific welding residual stress distributions used for the DM welds is provided in Section 4.0. The PWSCC crack growth analysis is discussed in Section 5.0. Section 6.0 provides a discussion on the adequacy of the Steam Generator inlet and outlet nozzle DM weld inlay thickness against PWSCC.

3.0 NOZZLE GEOMETRY AND LOADS

The dissimilar metal weld geometry for the V. C. Summer Unit 1 Steam Generator inlet and outlet nozzle is based on the nozzle details drawings (Reference 1). The Steam Generator inlet and outlet nozzle geometry and normal operating temperature are summarized in Table 3-1.

Table 3-1
V. C. Summer Unit 1 Steam Generator Nozzle DM weld Geometry and Normal Operating Temperature

Dimension	Inlet Nozzle	Outlet Nozzle
DM Weld Inside Diameter (inch)	31.03	31.03
DM Weld Thickness (inch)	4.81	4.81
DM Weld Alloy 152 Inlay Nominal Thickness (inch)	0.13	0.13
Normal Operating Temperature	618°F	556°F

The normal operating piping reaction loads at the Steam Generator inlet and outlet nozzle DM weld locations are based on the latest reactor coolant loop piping analysis of record (Reference 4) and are summarized in Table 3-2. These loads are used in PWSCC crack growth analysis.

Table 3-2
V. C. Summer Unit 1 Steam Generator Nozzle Normal Operating Piping Loads

Steam Generator Nozzle	Loading	Forces (kips)	Moments (in-kips)		
		Fx (Axial)	Mx (Torsion)	My (Bending)	Mz (Bending)
Inlet Nozzle	Deadweight	3.66	-43.9	1.5	173.8
Inlet Nozzle	Normal Operating Thermal	-225.4	1102.2	647.7	11750.3
Outlet Nozzle	Deadweight	13.01	62.9	14.4	32.3
Outlet Nozzle	Normal Operating Thermal	60.08	-1641.1	3882.2	-6424.8

4.0 Dissimilar Metal Weld Residual Stress Distribution

The welding residual stresses used in the PWSCC crack growth analysis were obtained from the finite element stress analysis (Reference 5) based on the plant specific Steam Generator inlet and outlet nozzle DM weld configuration (Reference 1) as well as taking into consideration of the as-built configuration. Both steam generator inlet and outlet nozzle DM weld configurations are identical and Figure 1-1 shows a sketch of the steam generator nozzle DM weld configuration. The finite element analysis in Reference 5 is based on a two-dimensional axi-symmetric model of the steam generator inlet and outlet nozzle dissimilar metal weld region. The finite element model geometry includes a portion of the low alloy steel nozzle, the stainless steel safe end, a portion of the stainless steel piping, the DM weld attaching the nozzle to the safe end, and the stainless steel weld attaching the nozzle safe end to the piping. The finite element analysis also assumes a 360° inside surface weld repair with a repair depth of 50% through the dissimilar metal weld thickness, which is consistent with MRP-287 guidance (Reference 9). The following fabrication sequence including an assumed 50% inside surface weld repair was simulated in the finite element residual stress analysis based on the information provided in the Steam Generator nozzle details drawings (Reference 1):

- The steam generator nozzle is buttered with weld-deposited Alloy 82 material.
- The inside surface region of the buttering and the nozzle end is clad with weld deposited Alloy 152 material.
- The nozzle and buttering are post weld heat treated (PWHT).
- The nozzle is welded to the safe end forging with Alloy 82 weld and a layer of Alloy 152 on the inside surface.
- A repair cavity (50% of original weld thickness) is machined out of the weld region.
- The repair cavity is filled with Alloy 82 weld metal with a layer of Alloy 152 on the inside surface.
- The outside and inside diameters of the weld region are machined to final size.
- A shop hydrostatic test is performed.
- The safe end is machined with the piping side weld prep.
- In order to simulate the field weld between the safe end and the attached piping, the safe end is welded to a long segment of stainless steel piping using a stainless steel weld.
- A plant leakage test is performed.

A detailed discussion of the finite element residual stress analysis is provided in Reference 5. Based on the results of the residual stress analysis, residual stress profiles under normal operating condition along various paths through the DM weld and inlay thickness were obtained from Reference 5 and the limiting through-wall welding residual stress profiles were used in the crack growth analysis.

5.0 PWSCC CRACK GROWTH ANALYSIS

A PWSCC crack growth analysis was performed by postulating a surface flaw in the inlay that could go undetected during the baseline inspection to be performed in 2014. Eddy current testing (Reference 10) demonstrated the ability to detect a surface flaw as shallow as 0.3 mm (0.012 in.) in depth and as short as 1.5 mm (0.06 in.) in length at the weld inlay. An initial flaw with a depth (0.065 in.) which is half the inlay thickness is postulated in the Alloy 152 weld inlay. The length of the postulated axial flaw is assumed to be the width of the Alloy 152 weld inlay resulting in an aspect ratio (length/depth) of 10 and the length of the postulated circumferential flaw is assumed to be 360° around the circumference. As a result, the postulated flaws in the PWSCC crack growth analyses are much larger than those that could be reasonably missed during the 2014 baseline inspection.

The results of the crack growth analysis can be used to determine the service life required for the postulated flaw to grow through the thickness of the Alloy 152 weld inlay. Crack growth due to PWSCC is calculated for both axial and circumferential flaws using the normal operating condition steady-state stresses. For axial flaws, the stresses included pressure and residual stresses, while for circumferential flaws, the stresses considered are pressure, 100% power normal thermal expansion, deadweight and residual stresses. The input required for the crack growth analysis is basically the information necessary to calculate the crack tip stress intensity factor (K_I), which depends on the geometry of the crack, its surrounding structure and the applied stresses. The geometry and loadings for the nozzles of interest are discussed in Section 3.0 and the applicable residual stresses used are discussed in Section 4.0. Once K_I is calculated, stress corrosion crack growth can be calculated using the applicable crack growth rate for the nickel-base alloy material (Alloy 182) from MRP-115 (Reference 6) with an improvement factor for Alloy 152 weld inlay material since the crack growth rate for Alloy 152 is slower than that for Alloy 182.

Using the applicable stresses at the dissimilar metal welds, the crack tip stress intensity factors can be determined based on the stress intensity factor expressions from Reference 11. The through-wall stress distribution profile is represented by a 4th order polynomial:

$$\sigma\left(\frac{a}{t}\right) = \sigma_0 + \sigma_1\left(\frac{a}{t}\right) + \sigma_2\left(\frac{a}{t}\right)^2 + \sigma_3\left(\frac{a}{t}\right)^3 + \sigma_4\left(\frac{a}{t}\right)^4$$

where,

σ_0, σ_1, σ_2, σ_3, and σ_4 are the stress profile curve fitting coefficients,

a is the distance from the wall surface where the crack initiates;

t is the wall thickness;

σ is the stress perpendicular to the plane of the crack.

The stress intensity factor calculations for semi-elliptical inside surface axial and circumferential flaws are expressed in the general form as follows:

$$K_I = \sqrt{\frac{\pi a}{Q}} \sum_{j=0}^{4} G_j\,(a/c, a/t, t/R, \Phi)\,\sigma_j \left(\frac{a}{t}\right)^j$$

where:

a:	Crack Depth
c:	Half Crack Length Along Surface
t:	Thickness of Cylinder
R:	Inside Radius
Φ:	Angular Position of a Point on the Crack Front
G_j:	G_j is influence coefficient for j^{th} stress distribution on crack surface (i.e., G_0, G_1, G_2, G_3, G_4).
Q:	The shape factor of an elliptical crack is approximated by: $Q = 1 + 1.464(a/c)^{1.65}$ for $a/c \le 1$ or $Q = 1 + 1.464(c/a)^{1.65}$ for $a/c > 1$.

The influence coefficients at various points on the crack front can be obtained by using an interpolation method. Once the crack tip stress intensity factors are determined, PWSCC crack growth calculations can be performed using the crack growth rate below with the applicable normal operating temperature.

The PWSCC crack growth rate used in the crack growth analysis for Alloy 152 weld inlay material is based on the EPRI recommended crack growth curve for Alloy 182 material (Reference 6) with an improvement factor of 100 as follows:

$$\frac{da}{dt} = \frac{1}{IF} \exp\left[-\frac{Q_g}{R}\left(\frac{1}{T} - \frac{1}{T_{ref}}\right)\right] \alpha(K)^{\beta}$$

where:

$\frac{da}{dt}$	=	Crack growth rate in m/sec (in/hr)
Q_g	=	Thermal activation energy for crack growth = 130 kJ/mole (31.0 kcal/mole)
R	=	Universal gas constant = 8.314×10^{-3} kJ/mole-K (1.103×10^{-3} kcal/mole-°R)
T	=	Absolute operating temperature at the location of crack, K (°R)
T_{ref}	=	Absolute reference temperature used to normalize data = 598.15 K (1076.67°R)

α	=	Crack growth amplitude
	=	1.50 x 10^{-12} at 325°C (2.47 x 10^{-7} at 617°F)
β	=	Exponent = 1.6
K	=	Crack tip stress intensity factor MPa√m (ksi√in)
IF	=	100 for Alloy 152 weld

This improvement factor of 100, although higher than that recommended in the public question response shown in Appendix A of this report, is a more realistic improvement factor for Alloy 152 welds based on the reported data documented in NUREG/CR-7103 (Reference 7) as well as those from GE Global Research (Reference 8). As shown in Figure 5-1, nearly all the measured stress corrosion propagation rates for the Alloy 52/152 welds are less than 1×10^{-8} mm/s with most less than 3×10^{-9} mm/s. There is also no difference between the crack growth rates of Alloy 52 and 152 welds shown in Figure 5-1; therefore the improvement factor of 100 for Alloy 52 recommended in Appendix A public question response is also applicable to Alloy 152 welds. Similarly, the reported data from GE Global Research (Reference 8) that are shown in Figure 5-2 also indicated low PWSCC crack growth rates for Alloy 52/152 welds and supports the use of a more accurate improvement factor of 100 for Alloy 152 welds. Although one weld tested by one laboratory exhibited higher growth rate of 5.7×10^{-8} mm/s (References 12, 13), an improvement factor to bound this data point is not necessary, because the industry approach for these nickel base alloys has been to use the 75th percentile PWSCC crack growth curve (Reference 6) instead of an upper bound curve. Therefore, the use of an improvement factor of 100 for Alloy 152 welds in the crack growth analysis based on 75th percentile of the reported data is the most accurate portrayal now available. The reported data used here was not available at the time of the public question response shown in Appendix A.

The normal operating temperature used in the crack growth analysis is 618°F and 556°F for the Steam Generator inlet and outlet nozzle respectively. The resulting PWSCC crack growth rates used in the crack growth analysis for the Alloy 152 weld inlay are as follows:

Steam Generator Inlet Nozzle Alloy 152 weld inlay:

$$da/dt = 1.537\times10^{-14}(K)^{1.6} \text{ m/sec}$$

Steam Generator Outlet Nozzle Alloy 152 weld inlay:

$$da/dt = 3.128\times10^{-15}(K)^{1.6} \text{ m/sec}$$

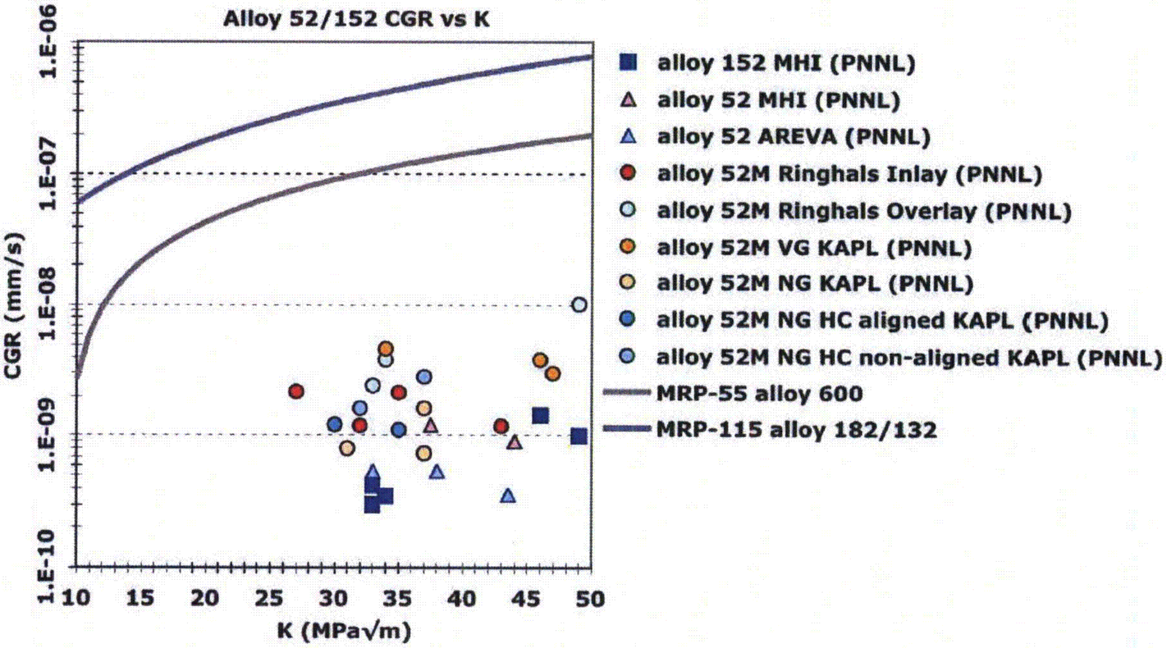


Figure 5-1: Summary of PNNL-Measured Constant K SCC Crack Growth Rates for Alloy 152/52/52M Weld Metals (Reference 7)

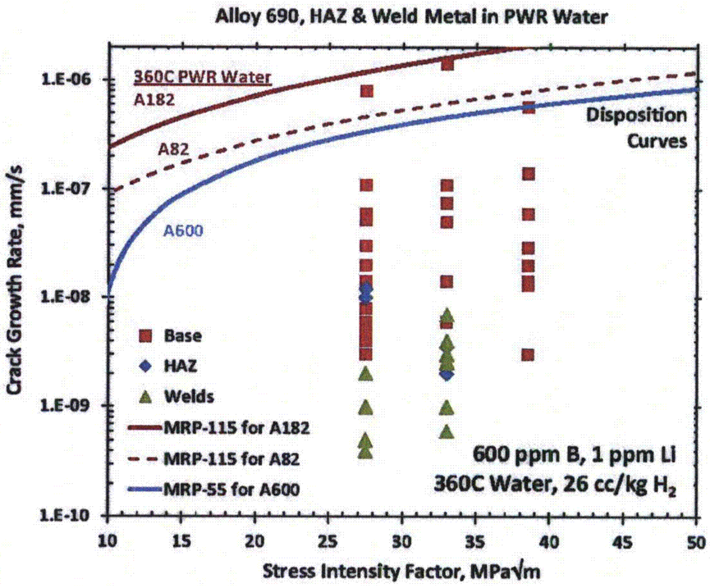


Figure 5-2: Summary of Crack Growth Rates Obtained by GE Research on Alloys 690, HAZ and Weld Metals in PWR Primary Water (Reference 8)

6.0 ADEQUACY OF DM WELD INLAY THICKNESS AGAINST PWSCC

In accordance with ASME Code Case N-770-1 (Reference 3), the volumetric examination interval for Inspection Item G "Un-cracked butt weld mitigated with an inlay" must not exceed 10 years. The PWSCC crack growth for a postulated surface flaw at the Alloy 152 weld inlay is calculated based on the normal operating condition piping loads and the plant specific welding residual stresses at the DM weld as well as the crack growth model in MRP-115 (Reference 6) with an improvement factor of 100. Both axial and circumferential inside surface flaws are considered in the crack growth analysis.

The PWSCC crack growth curves for the postulated axial and circumferential inside surface flaws in the replacement steam generator inlet and outlet nozzle Alloy 152 weld inlay are shown in Figures 6-1 and 6-2 respectively. The horizontal axis displays service life in Effective Full Power Years (EFPY), and the vertical axis shows the flaw depth in the weld inlay. The weld inlay thickness (0.13 inch nominal) is also shown in these figures for the respective flaw configurations. Based on the crack growth results from Figures 6-1 and 6-2, the service life required for the postulated surface flaws to grow through the weld inlay based on an improvement factor of 100 is tabulated in Table 6-1.

Table 6-1
Service Life Required to Grow Through the Alloy 152 Weld Inlay at the Steam Generator Inlet and Outlet Nozzle Based on An Improvement Factor of 100 over Alloy 182 Weld Crack Growth Rate

	Steam Generator Inlet Nozzle	Steam Generator Outlet Nozzle
Axial Flaw	10.8 EFPY	53 EFPY
Circumferential Flaw	18.3 EFPY	>70 EFPY

As shown in Table 6-1 as well as Figures 6-1 and 6-2, the service life required to grow through the Alloy 152 weld inlay is more than 10 Effective Full Power Years which is more than the required examination interval for Inspection Item G "Un-cracked butt weld mitigated with an inlay" in accordance with Code Case N-770-1.

Alloy 690 and the associated weld metals, Alloy 52 and Alloy 152, have been used in PWSCC susceptible Alloy 600 component repairs, mitigation and replacements. These high chromium nickel base alloys have been shown to be highly resistant to PWSCC in laboratory testing and have been free from any observed cracking in operating reactors for more than 20 years. In addition, the reactor coolant water chemistry during plant operation is monitored and maintained within specific limits. Contaminant

concentrations are kept below the threshold know to be conducive to stress corrosion cracking with the major water chemistry control standards being included in the plant operation procedures as a condition for plant operation. As a result of careful water chemistry control and the fact that the Alloy 152 weld inlay is highly resistant to PWSCC, the results presented in Table 6-1 are conservative because the service life required for crack initiation was ignored and that the postulated initial flaw sizes in the weld inlay are much larger that those that could be reasonably missed during the baseline inspection in 2014. Furthermore, the additional service life required to result in leakage and pipe rupture after the posulated flaws have penetrated the Alloy 152 weld inlay was not considered, rendering the results even more conservative.

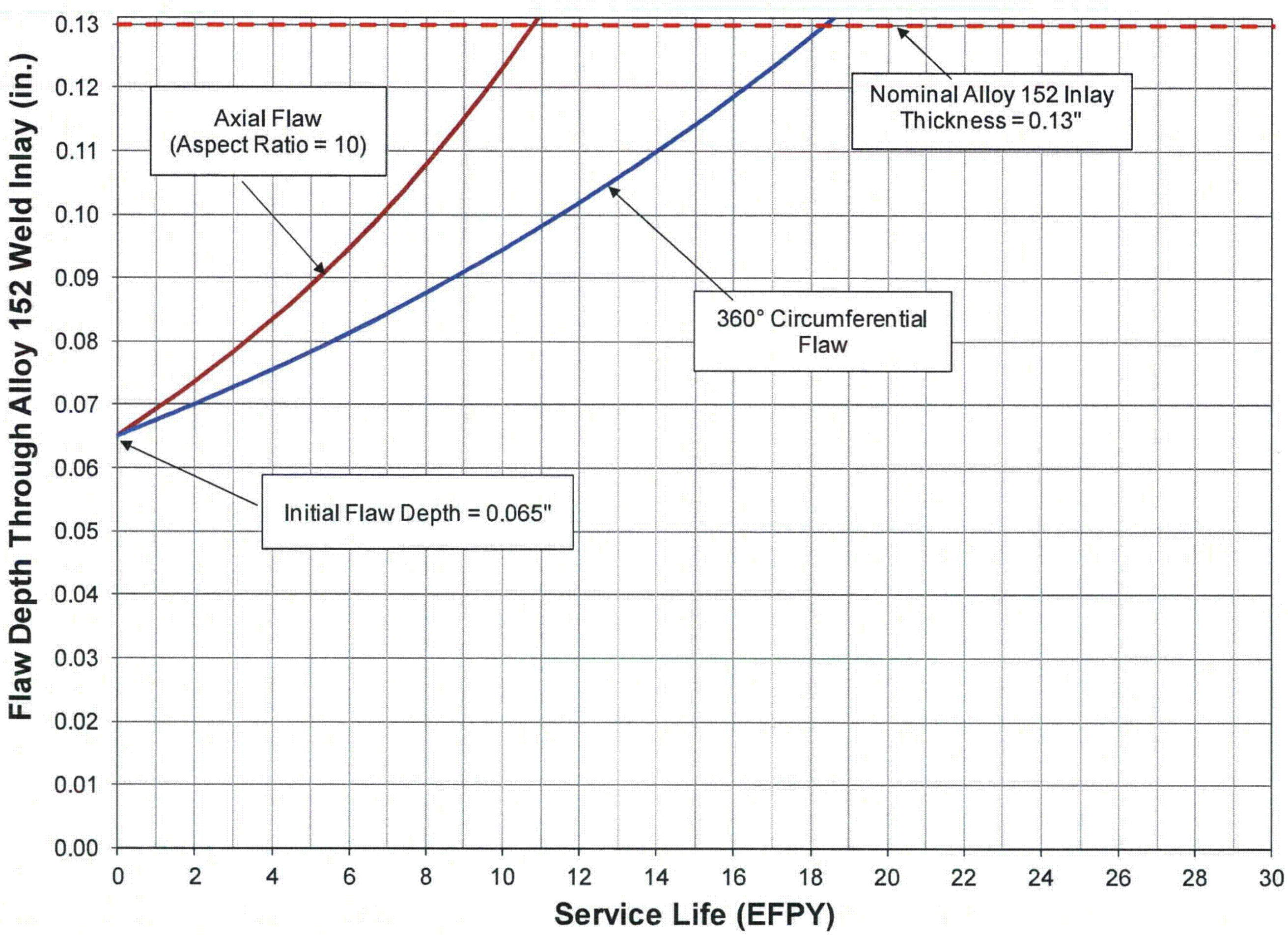


Figure 6-1: PWSCC Crack Growth Curve in Steam Generator Inlet Nozzle Alloy 152 Weld Inlay

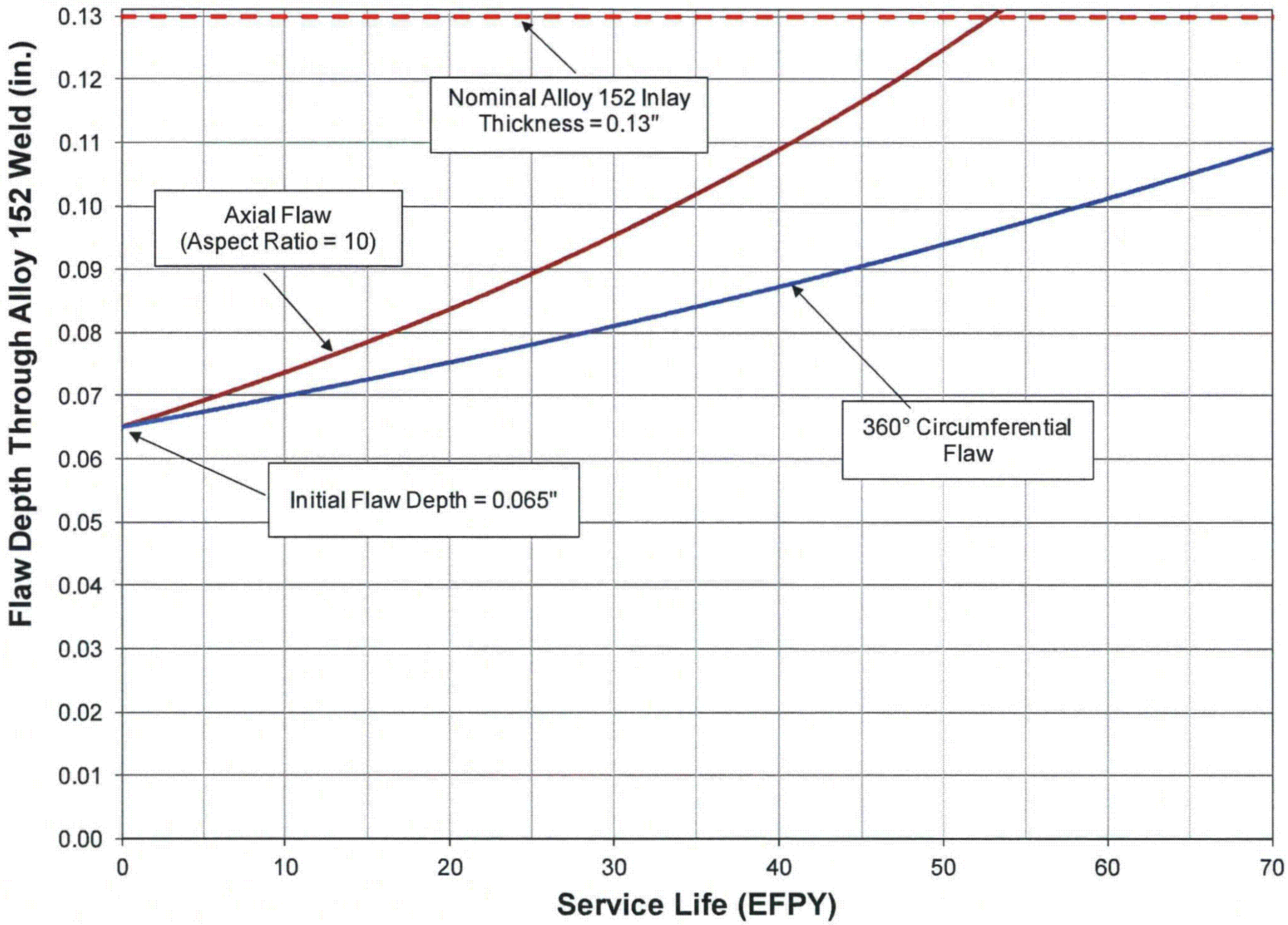


Figure 6-2: PWSCC Crack Growth Curve in Steam Generator Outlet Nozzle Alloy 152 Weld Inlay

7.0 SUMMARY AND CONCLUSIONS

The V. C. Summer Unit 1 replacement steam generator inlet and outlet nozzle Alloy 82 DM welds including the buttering were sealed with Alloy 152 weld inlay/cladding to provide a barrier to isolate the Primary Water Stress Corrosion Cracking (PWSCC) susceptible DM weld material from the primary water environment. Since these DM welds do not have susceptible material exposed to the primary water environment, it would be appropriate to re-categorize them as Inspection Item G "Un-cracked butt weld mitigated with an inlay" according to Code Case N-770-1. The DM welds for the inlet and outlet nozzle DM welds are currently being categorized as Inspection Items A-2 and B as "unmitigated butt welds" in accordance with Code Case N-770-1 which must be inspected at a higher frequency than the 10 year frequency normally required by ASME Section XI. In order to support the re-categorization, PWSCC crack growth analyses were performed to provide a technical basis for re-categorizing the DM welds of these replacement steam generator primary nozzles by demonstrating the adequacy of the Steam Generator inlet and outlet nozzle DM weld inlay thickness against PWSCC corresponding to Items 11 and 12 in the public question response shown in Appendix A of this report.

For PWSCC, the crack growth model for the Alloy 152 weld inlay material is based on that given in MRP-115 for Alloy 182 weld material with an improvement factor of 100. This improvement factor, although higher than that recommended in the public question response shown in Appendix A, is a more accurate improvement factor for Alloy 152 weld based on the reported data documented in NUREG/CR-7103 as well as those from GE Global Research. Based on the PWSCC crack growth analysis results from Section 6.0 using an improvement factor of 100, the service life required to grow through the Alloy 152 weld inlay is more than 10 Effective Full Power Years, which is more than the required examination interval of 10 years for Inspection Item G "Un-cracked butt weld mitigated with an inlay" in accordance with Code Case N-770-1. As a result of careful water chemistry control and the fact that Alloy 152 weld inlay is highly resistant to PWSCC, the crack growth results are conservative since the crack initiation time was ignored. Also, the postulated initial flaw sizes in the weld inlay are much larger that those that could be reasonably missed during the baseline inspection in 2014. Furthermore, the additional service life required to result in leakage and pipe rupture after the posulated flaws have penetrated the Alloy 152 weld inlay was not considered. Based on the crack growth results, adequacy of the Steam Generator inlet and outlet nozzle DM weld inlay thickness against PWSCC has been demonstrated. Therefore, it is technically justified to recategorize the V. C. Summer Unit 1 replacement steam generator inlet and outlet nozzle DM welds as Inspection Item G "Un-cracked butt weld mitigated with an inlay" in Code Case N-770-1.

8.0 REFERENCES

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3. ASME Code Case N-770-1, Section XI Division 1. "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR Piping and Vessel Nozzle Butt Welds Fabricated with UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities, Section XI, Division 1," ASME Approval Date January 26, 2009, Final Rule effective July 21, 2011 (76 FR 36232).
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13. B. Alexandreanu, "The Stress Corrosion Cracking Behavior of Alloys 690 and 152 Weld in a PWR Environment", Proc. 14th Int. Symp. on Environmental Degradation of Materials in Nuclear Power Systems – Water Reactors", American Nuclear Soc., August 2009.

Appendix A

Response to Public Meeting Question Number 29 on Code Case N-770-1 implementation

Q 29 What are the NRC's expectations for a licensee to include in a request to re-categorize welds mitigated by techniques similar to cladding, inlay or onlay mitigation?

A 29 ASME Section XI has been working on draft Code Case N-766, "Nickel Alloy Reactor Coolant Inlay and Onlay for Mitigation of PWR Full Penetration Circumferential Nickel Alloy Dissimilar Metal Welds of Class 1 Items." This Code Case has not been approved by ASME, pending resolution of comments from the NRC. The outstanding NRC comments deal with flaw analysis to include stress corrosion cracking calculations and eddy-current qualifications.

Despite the issues that NRC has with this draft Code Case, draft ASME Code Case N-766 provides useful guidance for preparing a request for alternative categorization to Inspection Items G–K of Code Case N-770-1. Any request to the NRC for alternative categorization should address the following items at a minimum:

1. Pre-inlay/onlay examinations performed including eddy current examination and acceptance criteria followed.
2. Repairs performed and any filler materials used.
3. Inlay/onlay materials used, including chromium content and the method used to determine the as-deposited weld bead chromium content.
4. Methods used to identify the dissimilar metal weld fusion zones and the accuracy of the methods used.
5. Qualifications of the weld procedure specifications, welders and welding operators.
6. Pre- and post-weld heat treatment or temper bead welding requirements followed.
7. Design and analysis requirements used, in detail.
8. Preservice and inservice inspections performed since installation of the inlays/onlays.
9. ASME Code Editions and Addenda associated with requirements used, where applicable, and figures, as applicable, to assist in describing the information submitted in conjunction with the request for alternative categorization.
10. Thickness of inlay/onlay.
11. Flaw evaluation to show adequate thickness against stress corrosion cracking.
12. For primary water stress corrosion crack growth rates for Alloy 52/152 weld materials, at this time, NRC recommends using the Alloy 182 crack growth rate curve provided in MRP-115, with an improvement factor (IF) of 100 for Alloy 52 welds and an IF of 10 for Alloy 152 welds.

South Carolina Electric & Gas Co. (SCE&G)
Virgil C. Summer Nuclear Station Unit 1 (VCSNS)
Relief Request

RR-III-08

1. Subject

Due to the June 21, 2011 change to 10CFR50.55a [FR36232 Volume 76, Number 119], Steam Generator Nozzles (Hot and Cold Leg) to Safe End Welds are required to have a baseline inspection performed in the first outage following January 20, 2012. For VCSNS the applicable outage is RF-20 scheduled for fall 2012. VCSNS requests to delay the baseline inspection to the next outage RF-21 scheduled for spring of 2014 to allow inspection strategies and methodologies to be developed. Currently there are no qualified vendors performing automated encoded ultrasonic or eddy current testing from the inside diameter of a steam generator nozzle. The industry is working to establish a qualified program but the equipment and guidance is in the developmental stage. Performing an ultrasonic and eddy current examinations or penetrant test manually would result in unusual difficulty in that the personnel performing the test would be subjected to a hazardous work environment and high radiation exposure. The VCSNS third 10-year inservice inspection (ISI) interval ends December 31, 2013. The one time deferral proposed herein extends the inservice inspection interval beyond the current third interval end date. VCSNS will conduct a visual examination of the steam generator hot leg safe end to nozzle welds during this RF-20. The visual exam will be consistent with the requirements of Code Case N-770-1 inspection item A-2 and B as reflected in note 2.

2. Components

The affected components are the VCSNS, Steam Generator Nozzle (Hot and Cold Leg) to Safe End Welds which are Alloy 82/182 with an Alloy 152 inlay that was installed during fabrication, prior to coming in contact with primary water. The dissimilar metal welds have been categorized in the VCSNS Risk Informed Inservice Inspection Program as non-susceptible to Pressurized Water Stress Corrosion Cracking (PWSSC) based on Chromium content of great than 24%.

2a. ASME Code Component(s) Affected

Table 2

Examination Category	Inspection Item*	Description
N-770-1	G	Weld CGE-1-4100A-31DM, Steam Generator "A" Hot Leg Nozzle
N-770-1	G	Weld CGE-1-4100A-32DM, Steam Generator "A" Cold Leg Nozzle
N-770-1	G	Weld CGE-1-4200A-28DM, Steam Generator "B" Hot Leg Nozzle
N-770-1	G	Weld CGE-1-4200A-29DM, Steam Generator "B" Cold Leg Nozzle
N-770-1	G	Weld CGE-1-4300A-29DM, Steam Generator "C" Hot Leg Nozzle
N-770-1	G	Weld CGE-1-4300A-30DM, Steam Generator "C" Cold Leg Nozzle

* Inspection Item was initially set as A-2 and B per the rulemaking change to 10CFR50.55a, with amendment to Code Case N-770-1. VCSNS has requested to recategorize the welds as Inspection Item G, "Uncracked Butt Weld Mitigated With An Inlay."

2b. Applicable Code Edition and Addenda

ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 1998 Edition through 2000 Addenda.

2c. Applicable Code Requirement

Code Case N-770-1, "Alternative Examination Requirements and Acceptance Standards for Class 1 PWR Piping and Vessel Nozzle Butt Welds Fabricated with UNS N06082 or UNS W86182 Weld Filler Material With or Without Application of Listed Mitigation Activities Section XI, Division 1"

ASME Code Section XI, Division 1, "Rules for Inspection and Testing of Components of Light Water Cooled Plants"

> **Article IWB-2500**, "Examination and Pressure Test Requirements"
> **Table IWB-2500-1**, "Examination Categories"

3. Code Requirement

Relief is being requested due to the change to 10CFR50.55a [FR36232 Volume 76, Number 119], issued June 21, 2011. The rule change requires the use of ASME Boiler & Pressure Vessel Code (BPVC) Code Case N-770-1 with conditions specified in 10CFR50.55a(g)(6)(ii)(F) specifically for Class 1 Piping and Nozzle Dissimilar-Metal Butt Welds. As stated within 10CFR50.55a(g)(6)(ii)(F)(3):

> "Baseline examinations for welds in Table 1, Inspection Items A–1, A–2, and B, shall be completed by the end of the next refueling outage after January 20, 2012. Previous examinations of these welds can be credited for baseline examinations if they were performed within the re-inspection period for the weld item in Table 1 using Section XI, Appendix VIII requirements and met the Code required examination volume of essentially 100 percent. Other previous examinations that do not meet these requirements can be used to meet the

baseline examination requirement, provided NRC approval of alternative inspection requirements in accordance with paragraphs (a)(3)(i) or (a)(3)(ii) of this section is granted prior to the end of the next refueling outage after January 20, 2012."

4. Relief Request

VCSNS is requesting approval for alternative inspection requirements in accordance with paragraph 10CFR50.55a(a)(3)(ii) of this section by declaring hardship or unusual difficulty without a compensating increase in the level of quality and safety. Implementation of the alternative inspection requires a relief pursuant to 10CFR50.55a(a)(3)(ii) for the baseline performance for six primary Steam Generator (nozzle to safe-end) welds during the next scheduled refueling outage (RF). VCSNS is requesting to delay the inspection to provide additional time to plan, qualify and implement the inspections. VCSNS is declaring hardship due to the following:

1. Each SG dissimilar metal weld has a unique safe end geometry which will require, at the minimum, the fabrication of up to six mock-ups to qualify the ultrasonic examination from the outside surface.
2. Ultrasonic examination from the outside surface, will not meet the code required examination volume of essentially 100 percent.
3. The VSCNS refueling schedules do not include drain down and opening the steam generator primary man ways until the 2014 outage. Adding the weld inspections from the inside diameter during the fall 2012 outage will result in an increase in outage duration, unplanned dose and significant additional costs.
4. The industry is working to establish a qualified program for performing encoded ultrasonic and eddy current examination from the inside diameter but the equipment and guidance is currently in the developmental stage. Additionally, the equipment being developed is scheduled to support another station's outage and will not be available for use at VCSNS in the fall of 2012.
5. There are no qualified vendors to perform surface examination using automated encoded eddy current testing from the inside surface. The industry is working to establish a qualified program but the equipment and guidance is currently in the developmental stage. The availability of qualified personnel will be limited to the organization that is developing the program that is scheduled to support another station's outage.
6. Conducting a liquid penetrant inspection on the welds from the inside surface would result in high radiation exposure.

5. Alternate Inspection

South Carolina Electric & Gas Company (SCE&G) proposes to delay the volumetric and inside surface inspection beyond the third 10-year inservice inspection (ISI) interval. The delay of the inspection to would allow the development of inspection strategies and methodologies. VCSNS has six unique nozzle geometries and does not own a mockup for any of the configurations. VCSNS has requested recategorization to inspect per Item G of Code Case N-770-1 that requires a surface examination to be performed from the weld inside surface and a volumetric examination performed from either the inside or outside surface. The delay would allow the development of an inside examination strategy. Currently there are no qualified vendors performing automated encoded ultrasonic or eddy current testing from the inside diameter of a steam generator nozzle. The industry is working to establish a qualified program but the equipment and guidance is currently in the developmental stage. Performing an ultrasonic and eddy current or penetrant test manually would result in personnel performing a difficult test from the inside of the steam generator. Having personnel enter the steam generator and perform the test manually would subject them to a hazardous work environment and high radiation exposure. SCE&G proposes to conduct the baseline inspection with a qualified program during the following outage RF-21 scheduled for spring 2014. VCSNS will conduct a visual examination of the steam generator hot leg safe end to nozzle welds during this RF-20. The visual exam will be in accordance with the requirements of Code Case N-770-1, table 1, note 2 for inspection items A-2.

6. Basis for Relief

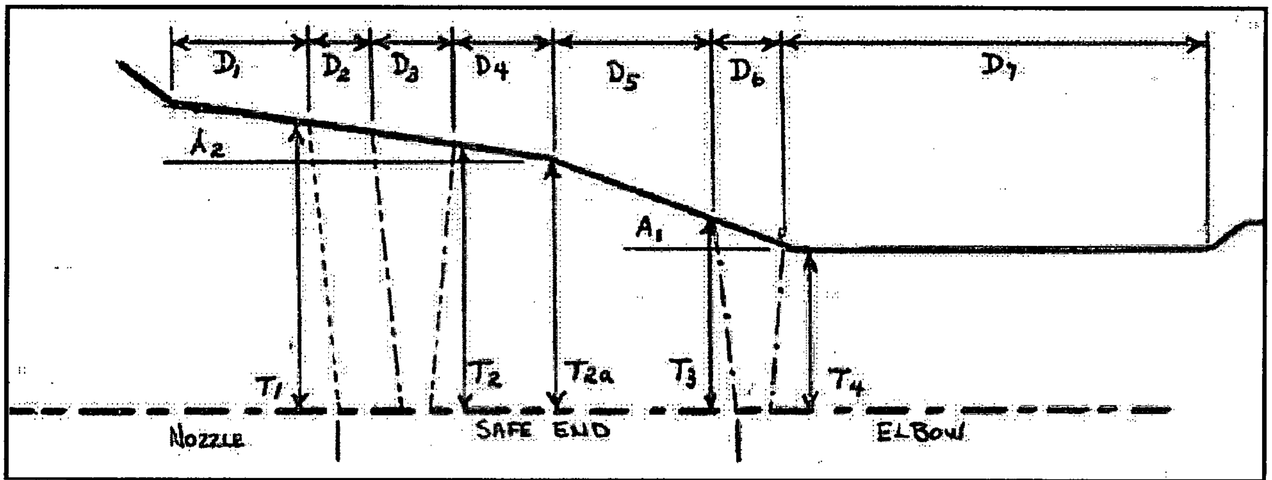
Due to the June 21, 2011 change to 10CFR50.55a [FR36232 Volume 76, Number 119], the primary steam generator nozzle to safe end welds are required to have a baseline performed in the first outage following January 20, 2012. For VCSNS the applicable outage is RF20 scheduled for fall 2012. The rulemaking change requires the use of ASME Boiler & Pressure Vessel Code (BPVC) Code Case N-770-1 with conditions specified in 10CFR50.55a(g)(6)(ii)(F). Due to the imposed rulemaking change to 10CFR50.55a, VCSNS Steam Generator Nozzles (Hot and Cold Leg) to Safe End Welds are categorized as Code Case N-770-1 Inspection Items A-2 and B. Based on the manufacturing process of the replacement steam generators and guidance from Code Case N-770-1, VCSNS Steam Generator Nozzle (Hot and Cold Leg) Safe End Welds should be categorized as Inspection Item G, "Uncracked Butt Weld Mitigated With An Inlay." VCSNS has requested to apply an alternative categorization for replacement Steam Generator Nozzles (Hot and Cold Leg) Safe End Welds. Per Code Case N-770-1 table 1, Examination Categories for Item G, a surface examination must be performed from the weld inside surface and a volumetric examination performed from either the inside or outside surface. The industry is working to establish a qualified program for performing encoded ultrasonic and eddy current examination from the inside diameter but the equipment and guidance is currently in the developmental stage.

The six steam generator primary inlet and outlet nozzles were manufactured in 1993-1994 in the Pensacola, Florida Westinghouse manufacturing facility. The nozzles (Channel Head Forgings) were buttered with Alloy 82/182 weld material then inlayed with Alloy 152 weld material deposited on the inside diameter of the nozzle. The inside diameter was then machined to the final dimensions. Therefore the Alloy 82/182 weld material in these nozzles has been covered with an Alloy 152 inlay since it was manufactured, and has never been in contact with primary water. The inlayed Alloy 152 weld filler material as manufactured with approximately 28.8% Chromium and the main Alloy 82/182 weld metal used for these welds was approximately 20% Chromium. Per Case N-766, the thickness shall be at least 1/8 inches (0.125 inches) and extend beyond the Alloy 152 weld material and the butter fusion zone by at least 1/4 inches (0.25 Inches). Based on VCSNS drawings, the as-left inlay thickness at its lowest point as a nominal 0.13 inches (+0/-0.05 inches). The inlay extends past the butter fusion zone by 0.91 inches and capped the dissimilar metal weld. The dissimilar metal welds have been categorized in the VCSNS Risk Informed Inservice Inspection Program as non-susceptible to PWSCC based on Chromium content of greater than 24%.

Each steam generator nozzle has its own unique geometry due to the final field machining processes used to mate the nozzles to the pipes. The six unique geometries and would require multiple mockups to demonstrate proficiency from the outside diameter. VCSNS does not own a mockup of these nozzles and does not have a qualified technique in-house to perform outside diameter or inside diameter exams on this configuration. To approve the methodology VCSNS would be required to manufacture a heavy wall (approximately 5.5 inches thick) large diameter carbon steel forging and stainless steel pipe. The mockup would also need to be precisely welded and machined for each nozzle to reflect the appropriate outside diameter geometry while reflecting the proper examination angles in the plant. Based on the as-built configuration, it is estimated that the maximum obtainable coverage for circumferential flaw detection would be at best be 60% of circumferential coverage which would not meet the code required examination volume of essentially 100%.

Weld profiles have been summarized within Table 3 that reflects the dimensions of each nozzle attribute. The Dissimilar Metal Weld to Safe End Tangent is represented by dimension number D4 and the Safe End Tangent to Elbow Weld is represented by the dimension number D5. The Weld and Safe End Surface Angles are represented by A1 and the Safe End Tangent Surface Angles are represented by A2. Other dimensions as reflected within the sketch can be found within Attachment 1 of this enclosure.

Table 3



Dim.	A-CL	A-HL	B-CL	B-HL	C-CL	C-HL
D4 (in.)	2.25	2.25	4.00	2.125	2.25	1.32
D5 (in.)	4.82	3.85	2.00	4.82	4.25	1.50
A1 (deg.)	22	22	22	22	22	23
A2 (deg.)	9	9	9	9	9	9

6a. Precedents

None.

7. Implementation Schedule

SCE&G proposes to delay the volumetric examination and the inside surface examination beyond the third 10-year ISI interval end date of December 31, 2013 and perform the inspection during the next refueling RF21scheduled for 2014. VCSNS will conduct a visual examination of the steam generator hot leg safe end to nozzle welds during this RF-20. The visual exam will be in accordance with the requirements of Code Case N-770-1, table 1, note 2 for inspection items A-2.

8. References

Proprietary documents may be viewed at the Westinghouse Rockville, MD. office.

1. 10CFR50-55a, Codes and Standards
2. FR36232 Volume 76, Number 119, issued June 21, rulemaking change to 10CFR50.55a
3. Public Meeting Summary ASME N-770-1 [ML112240818]
4. Virgil C. Summer Nuclear Station – Relief Request (RR-II-07) Associated with the Risk-Informed Inservice Inspection (RI-ISI) Program (TAC NO. MB6523) [ML031320443]
5. ASME CODE CASE N-770-1

6. ASME Boiler and Pressure Vessel Code, Section XI, 1998 Edition through 2000 Addenda, American Society of Mechanical Engineers, New York

7. EPRI 1010087 MRP-139

8. VCSNS Drawings [PROPRIETARY]

    a. CGE-1-4100A-31DM, Weld Profile, Steam Generator "A" Hot Leg Nozzle
    b. CGE-1-4100A-32DM, Weld Profile, Steam Generator "A" Cold Leg Nozzle
    c. CGE-1-4200A-28DM, Weld Profile, Steam Generator "B" Hot Leg Nozzle
    d. CGE-1-4200A-29DM, Weld Profile, Steam Generator "B" Cold Leg Nozzle
    e. CGE-1-4300A-29DM, Weld Profile, Steam Generator "C" Hot Leg Nozzle
    f. CGE-1-4300A-30DM, Weld Profile, Steam Generator "C" Cold Leg Nozzle

9. Westinghouse LTR-SGDA-12-27 [PROPRIETARY], V. C. Summer Unit 1 Replacement Steam Generators – Manufacturing Records for Channel Head Primary Inlet/Outlet Nozzle to Safe End Welds, Dated June 18, 2012

10. Westinghouse LTR-PAFM-12-86-NP, Flaw Tolerance Evaluation to Support Re-categorization of V. C. Summer Unit 1 Steam Generator Nozzle to Safe End Dissimilar Metal Weld Inspection Requirements, Dated July 2012

South Carolina Electric & Gas Co. (SCE&G)
Virgil C. Summer Nuclear Station Unit 1 (VCSNS)

Enclosure 2
Attachment 1

Steam Generator Weld Profiles

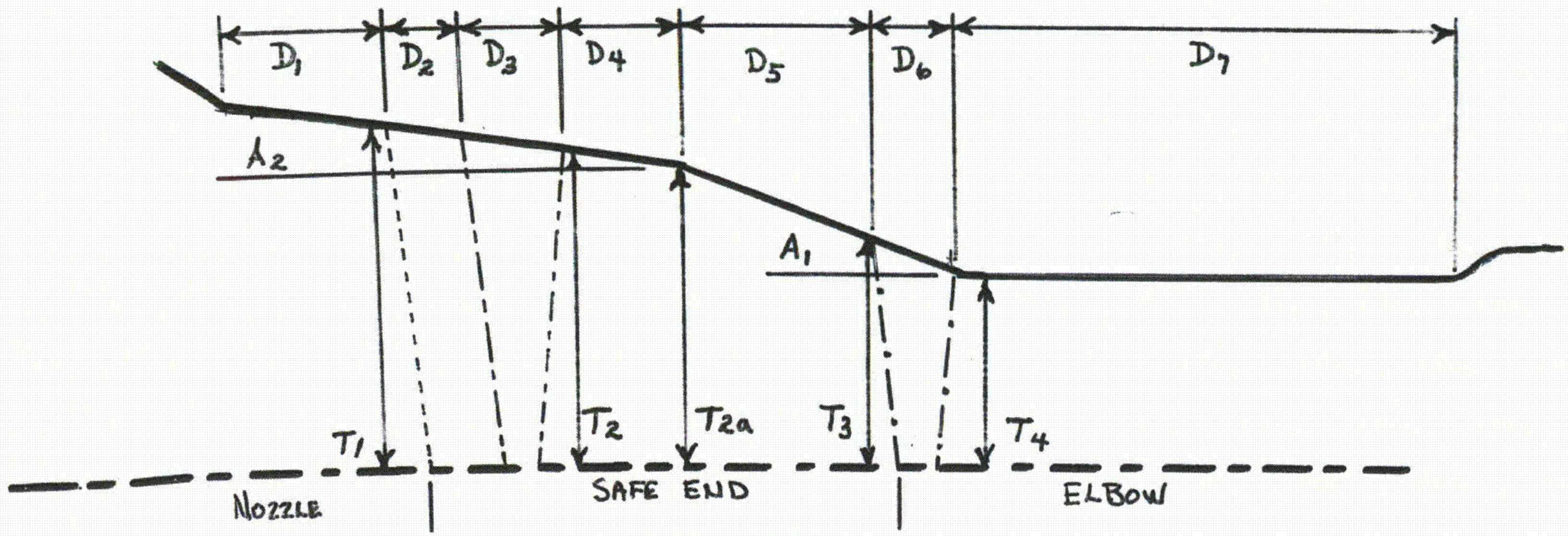
Plant: V. C. Summer Unit #1
Date: 6/14/2005
Component: Steam Generator "A" Hot Leg Nozzle
ISI Component ID: CGE-1-4100A-31DM

Nominal Piping Diameter: 29" ID
Nominal Piping Thickness: 2.500"

#	Description	Dim
D_1	Nozzle Taper to Butter	1.6"
D_2	Buttering Width *	.5"
D_3	DM Weld Width *	1.12"
D_4	DM Weld to Safe End Tangent	2.25"
D_5	Safe End Tangent to Elbow Weld	3.85"
D_6	Elbow Weld Width	1.75"
D_7	Weld to BM Restriction	4.00"

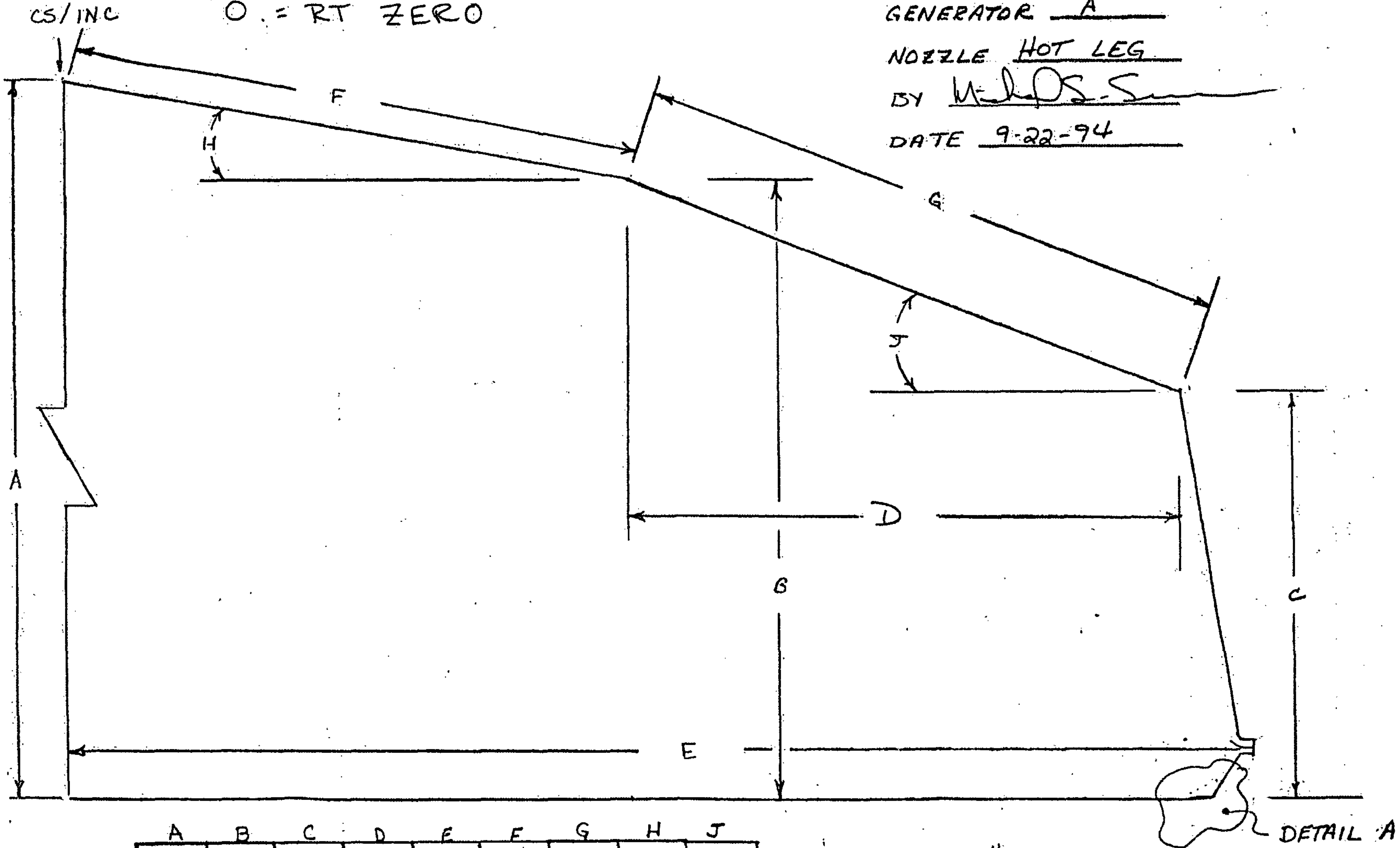
#	Description	Dim
A_1	Weld and Safe End Surface Angle	22
A_2	Safe End Tangent Surface Angle	8
T_1	Nozzle Thickness	5.285"
T_2	Safe End Thickness, Upper	5.006
T_{2a}	Safe End Thickness, Tangent	4.695"
T_3	Safe End Thickness at Weld	2.9"
T_4	Nominal Elbow Thickness	2.500"

Comments: * Assumed dimension from combined width of 1.625"

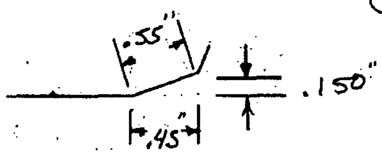


"O" = RT ZERO

GENERATOR A
NOZZLE HOT LEG
BY [signature]
DATE 9-22-94



	A	B	C	D	E	F	G	H	J
0°	5.077	4.463	2.960	3.95	8.40	3.994	3.994	8.8°	22.1°
90°	5.015	4.516	2.816	4.55	8.50	3.761	4.377	7.6°	22.9°
180°	5.055	4.449	2.981	3.78	8.25	4.129	3.863	8.4°	22.3°
270°	5.042	4.358	3.138	3.25	8.00	4.183	3.393	8.8°	21.1°



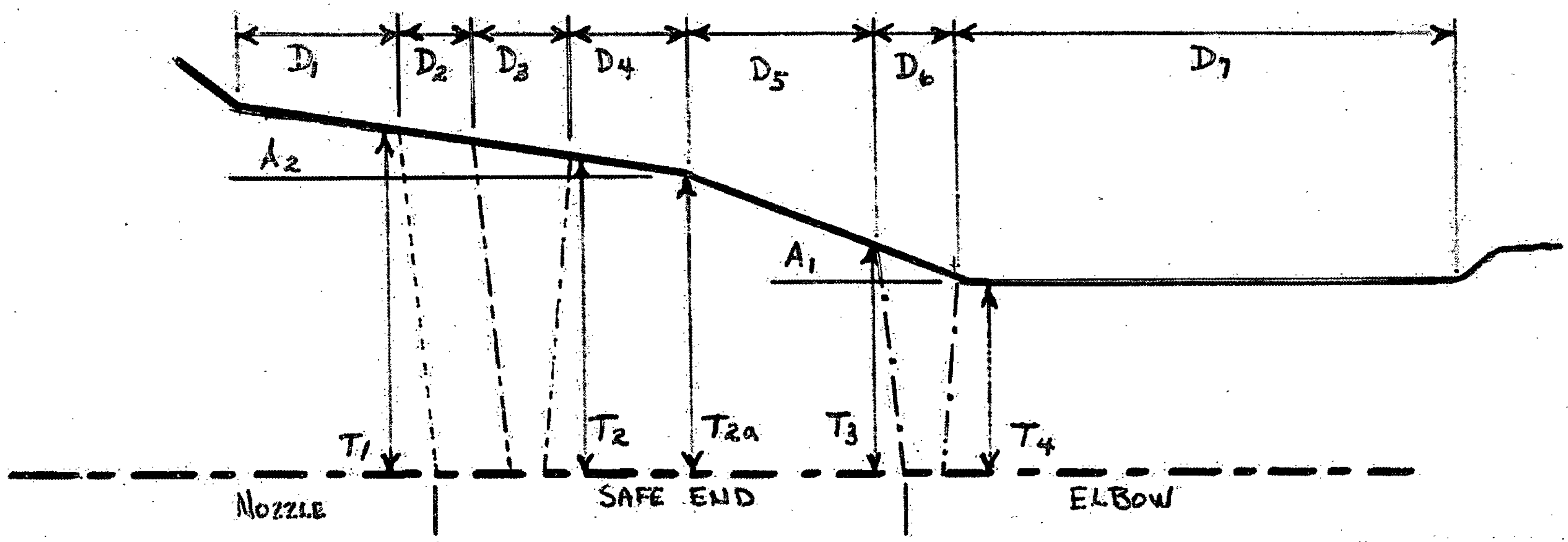
DETAIL A
COUNTER BORE SHOWN IS THE MAXIMUM
COUNTER BORE IS FROM .60" TO 1.16"

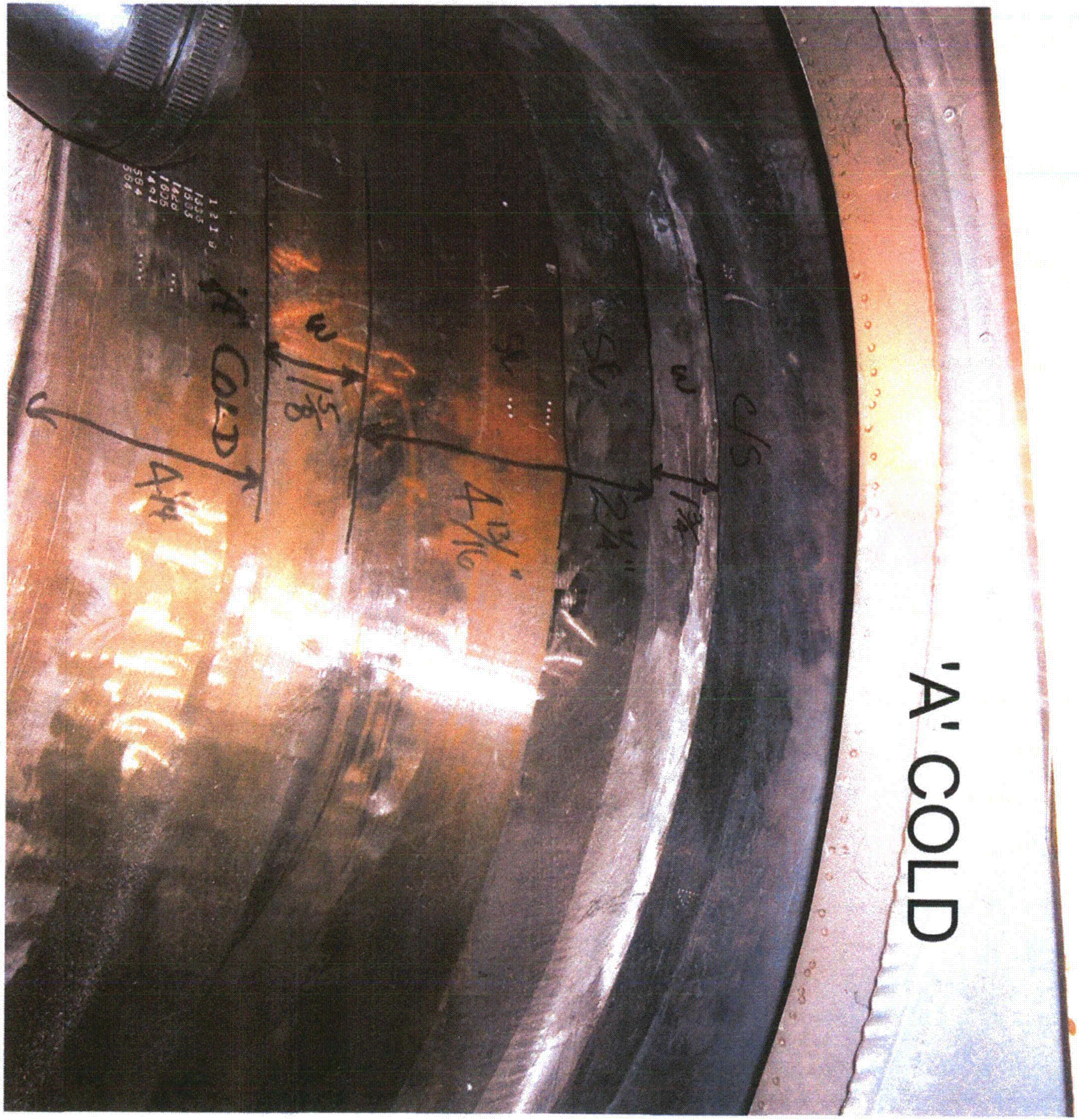
Plant: V. C. Summer Unit #1
Date: 6/14/2005
Component: Steam Generator "A" Cold Leg Nozzle
ISI Component ID: CGE-1-4100A-32DM

Nominal Piping Diameter: 31" ID
Nominal Piping Thickness: 2.625"

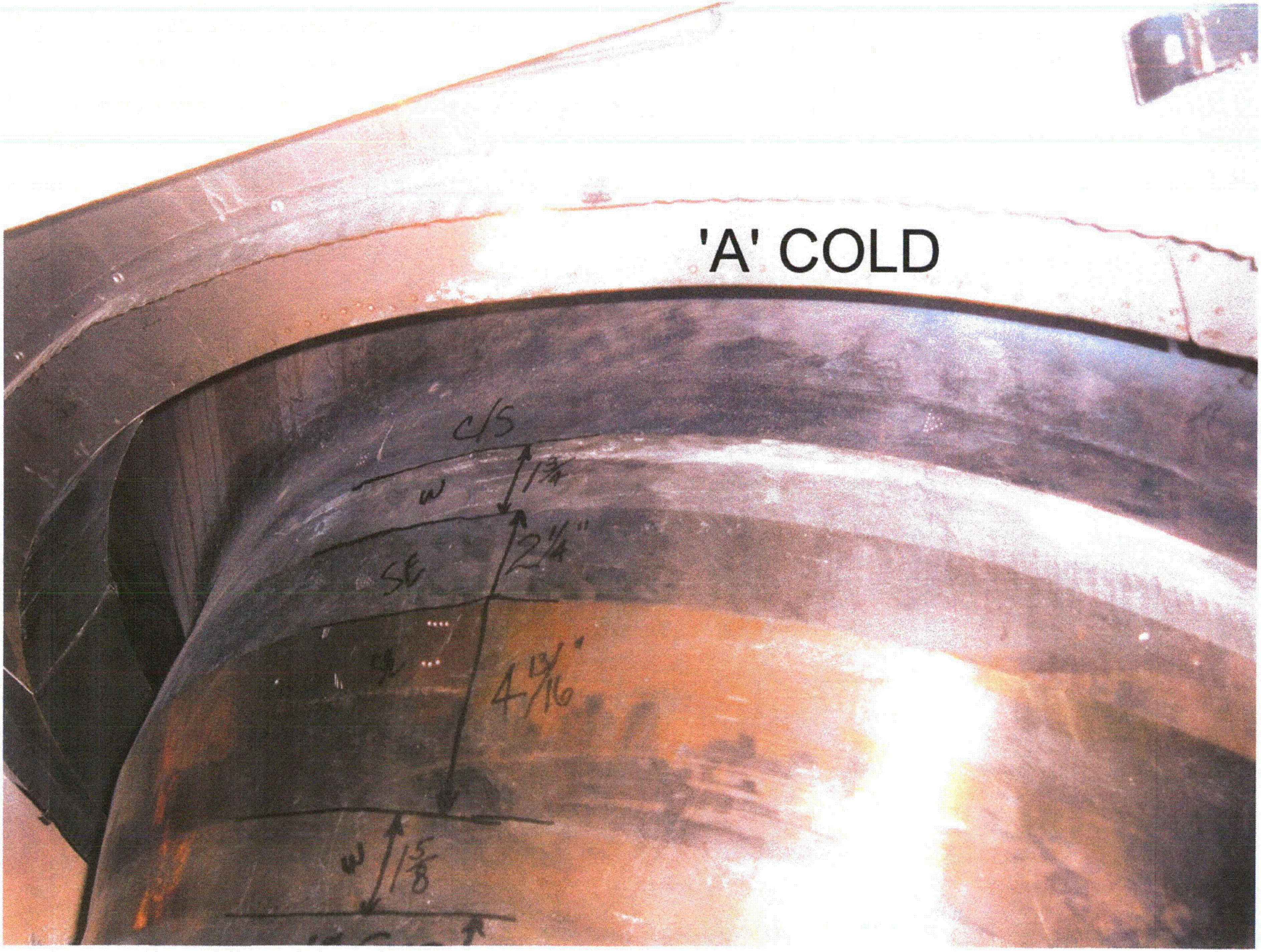
#	Description	Dim	#	Description	Dim
D_1	Nozzle Taper to Butter	1.5"	A_1	Weld and Safe End Surface Angle	22
D_2	Buttering Width *	.5"	A_2	Safe End Tangent Surface Angle	9
D_3	DM Weld Width *	1.25"	T_1	Nozzle Thickness	5.1"
D_4	DM Weld to Safe End Tangent	2.25"	T_2	Safe End Thickness, Upper	N/A
D_5	Safe End Tangent to Elbow Weld	4.82"	T_{2a}	Safe End Thickness, Tangent	4.5"
D_6	Elbow Weld Width	1.63"	T_3	Safe End Thickness at Weld	2.9"
D_7	Weld to BM Restriction	4.25"	T_4	Nominal Elbow Thickness	2.625"

Comments: * Assumed dimension from combined width of 1.75"

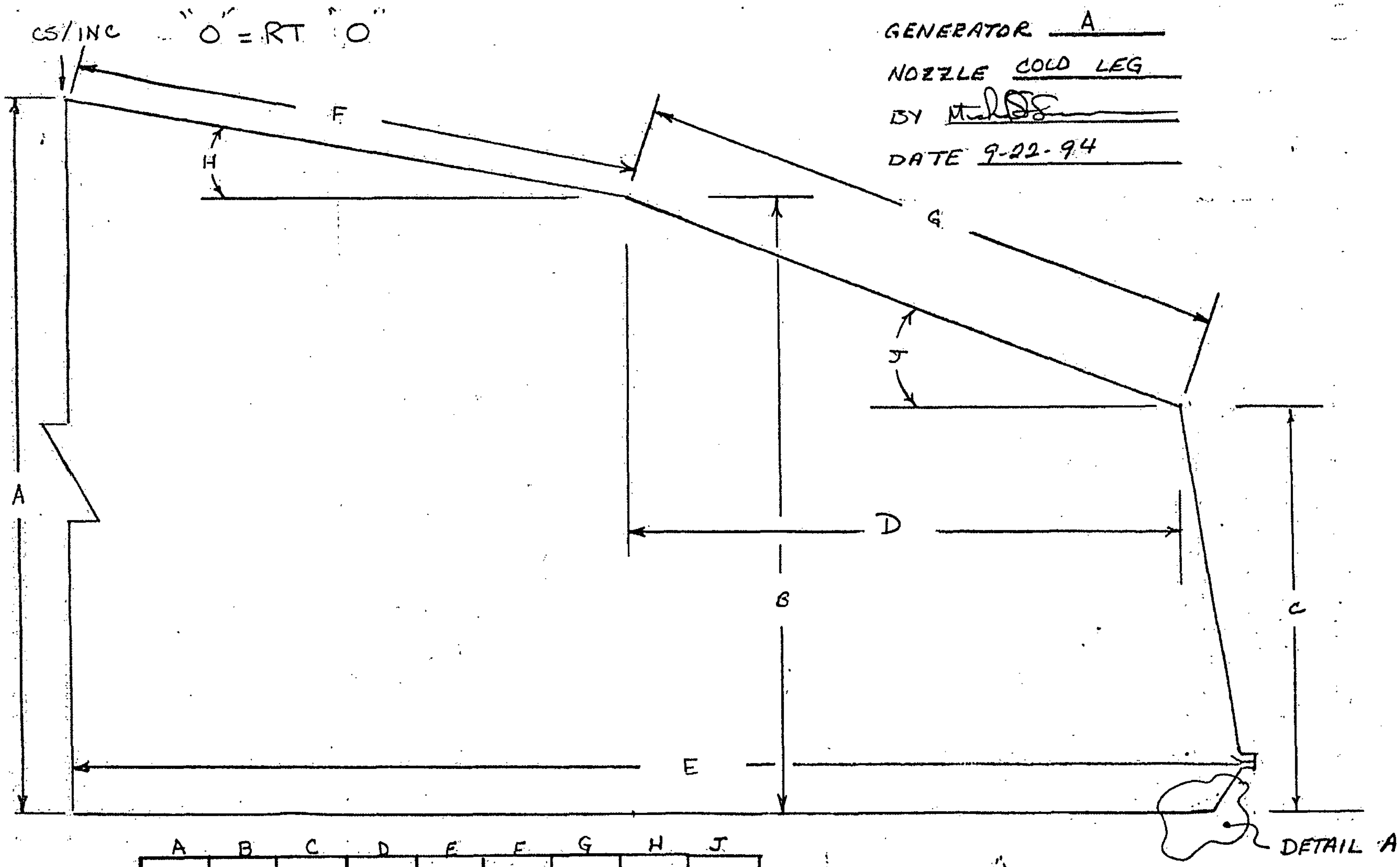



'A' COLD

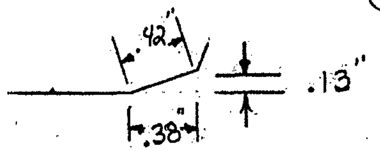

'A' COLD


'A' COLD
C/S
W
1 3/4
SE
2 1/4"
4 13/16"
W
1 5/8

GENERATOR A
NOZZLE COLD LEG
BY [signature]
DATE 9-22-94



	A	B	C	D	E	F	G	H	J
0°	5.025	4.545	2.928	4.30	8.159	3.424	4.468	8.0°	21.2°
90°	5.116	4.580	2.882	4.38	8.089	3.446	4.470	8.9°	22.3°
180°	5.073	4.435	2.960	3.85	8.384	4.072	3.857	9.0°	22.5°
270°	5.100	4.442	3.010	4.00	8.406	4.427	3.765	8.5°	22.4°



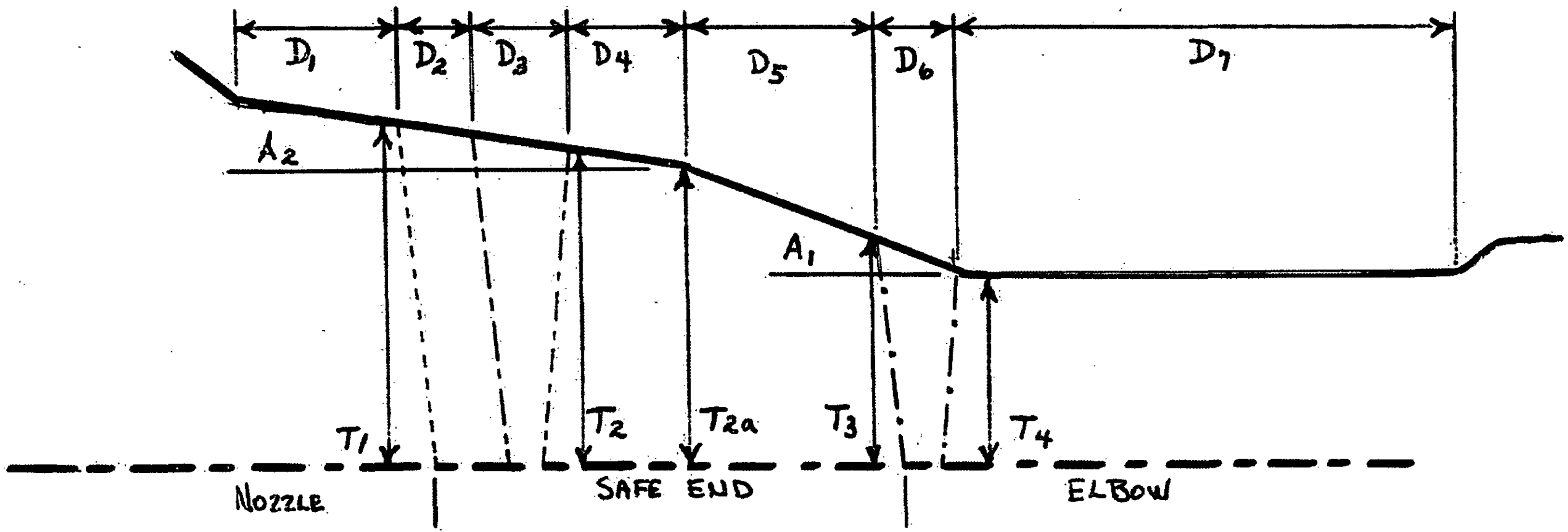
DETAIL A
COUNTER BORE SHOWN IS THE MAXIMUM
COUNTER BORE IS FROM 37.5-0 TO 18"

Plant: V. C. Summer Unit #1
Date: 6/14/2005
Component: Steam Generator "B" Hot Leg Nozzle
ISI Component ID: CGE-1-4200A-28DM

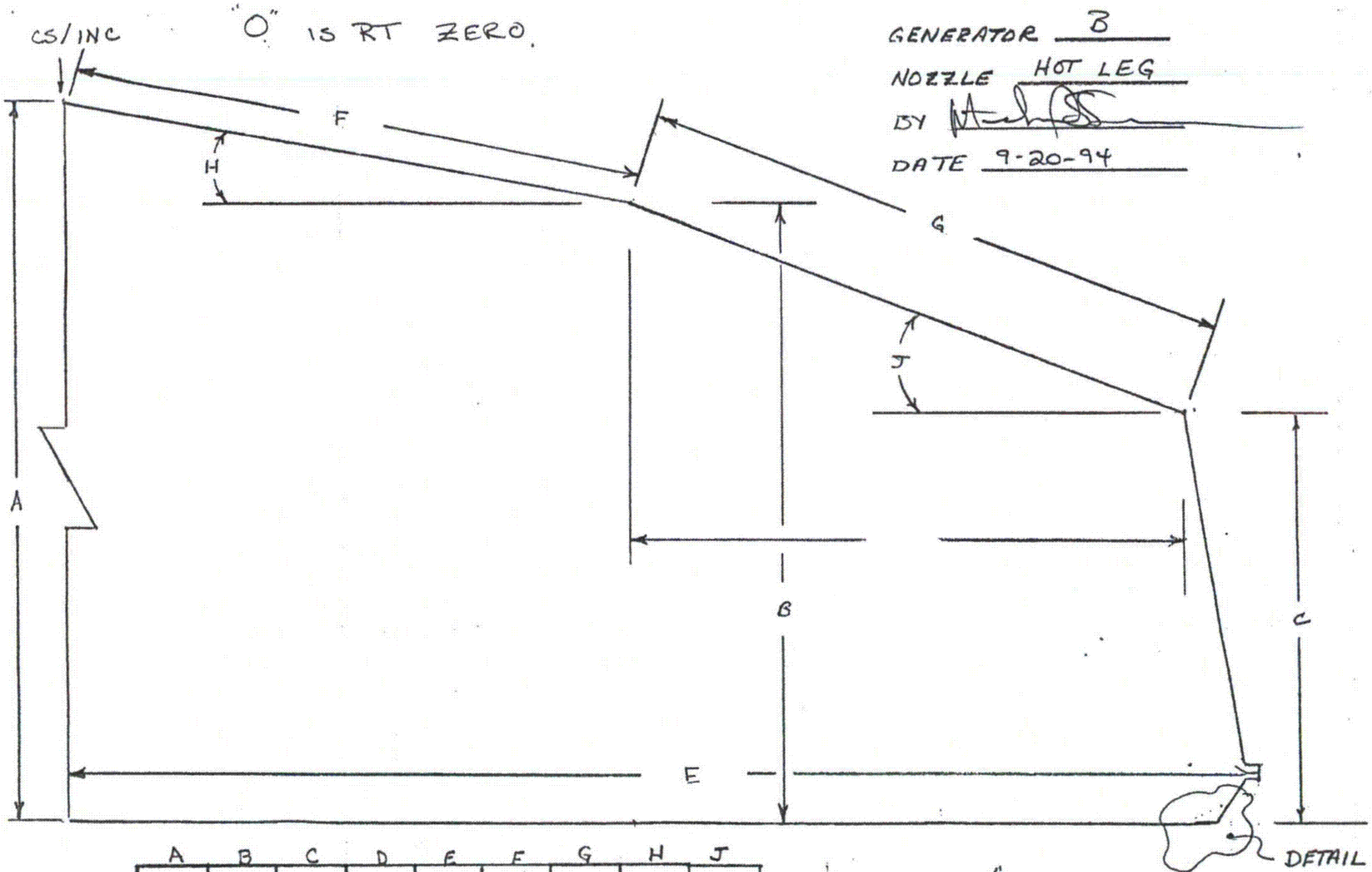
Nominal Piping Diameter: 29" ID
Nominal Piping Thickness: 2.500"

#	Description	Dim	#	Description	Dim
D_1	Nozzle Taper to Butter	1.6"	A_1	Weld and Safe End Surface Angle	22
D_2	Buttering Width *	.5"	A_2	Safe End Tangent Surface Angle	9
D_3	DM Weld Width *	1.44"	T_1	Nozzle Thickness	5.178"
D_4	DM Weld to Safe End Tangent	2.125"	T_2	Safe End Thickness, Upper	4.926
D_5	Safe End Tangent to Elbow Weld	4.82"	T_{2a}	Safe End Thickness, Tangent	4.625"
D_6	Elbow Weld Width	1.875"	T_3	Safe End Thickness at Weld	3.0"
D_7	Weld to BM Restriction	4.125"	T_4	Nominal Elbow Thickness	2.500"

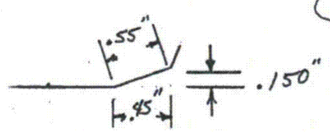
Comments: * Assumed dimension from combined width of 1.938"



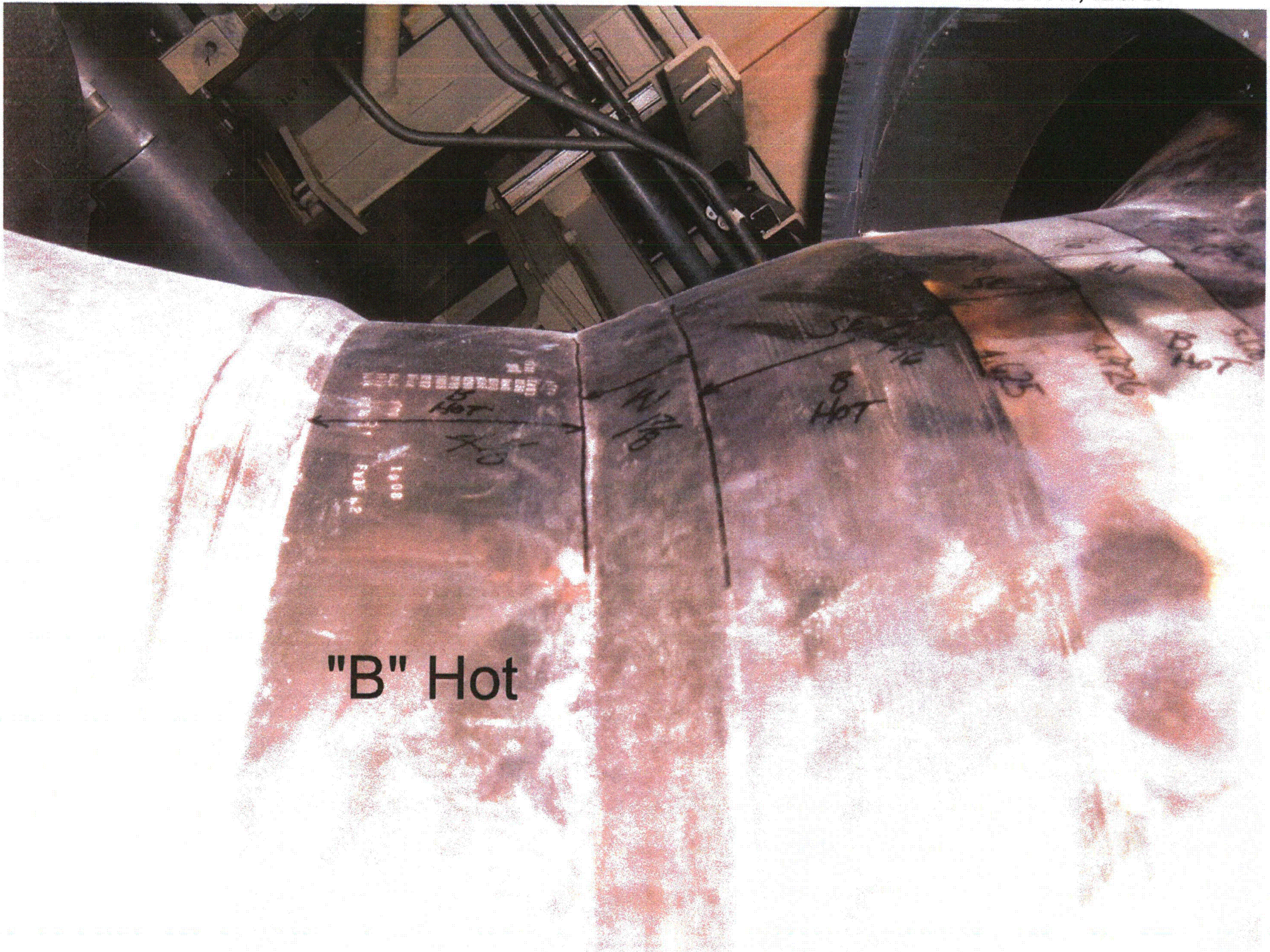
GENERATOR B
NOZZLE HOT LEG
BY [signature]
DATE 9-20-94



	A	B	C	D	E	F	G	H	J
0°	5.010	4.296	3.063	3.18	8.292	4.728	3.310	8.7°	21.9°
90°	5.014	4.168	3.091	4.15	7.978	5.222	2.891	9.3°	21.9°
180°	5.071	4.422	2.894	3.70	8.403	4.200	3.907	8.9°	23.0°
270°	5.015	4.460	2.900	2.80	8.402	3.977	4.324	8.0°	21.1°



DETAIL A
COUNTER BORE SHOWN IS THE MAXIMUM
COUNTER BORE IS FROM 105"TO0 TO 47. CW

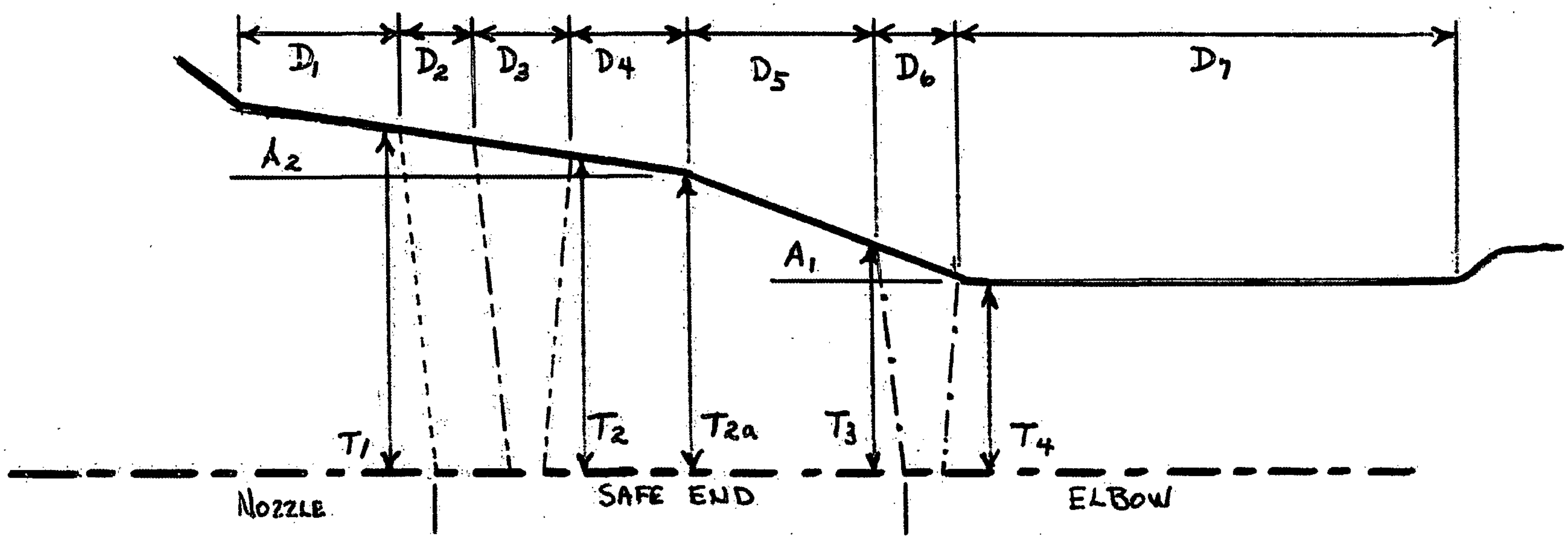

"B" Hot

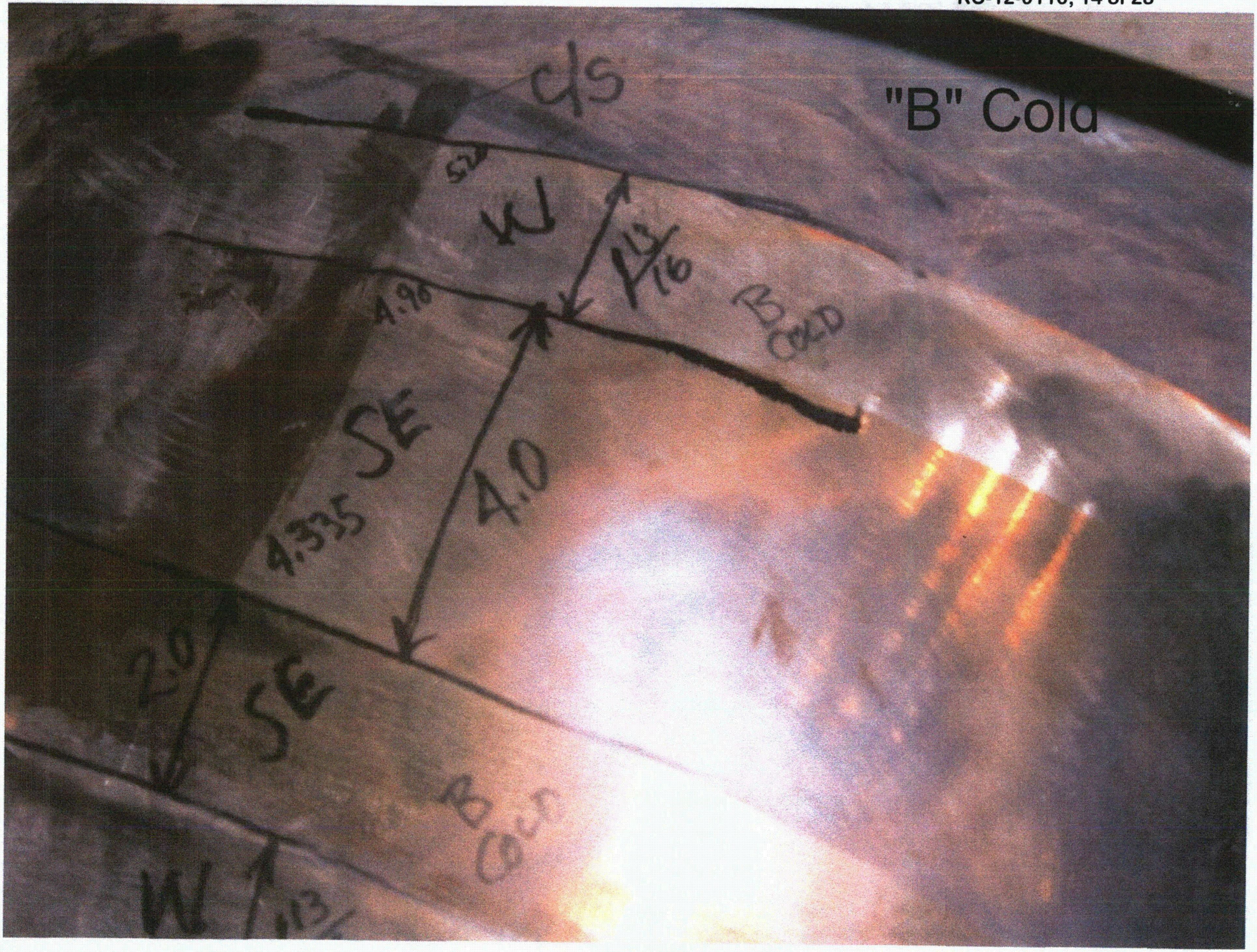
Plant: V. C. Summer Unit #1
Date: 6/14/2005
Component: Steam Generator "B" Cold Leg Nozzle
ISI Component ID: CGE-1-4200A-29DM

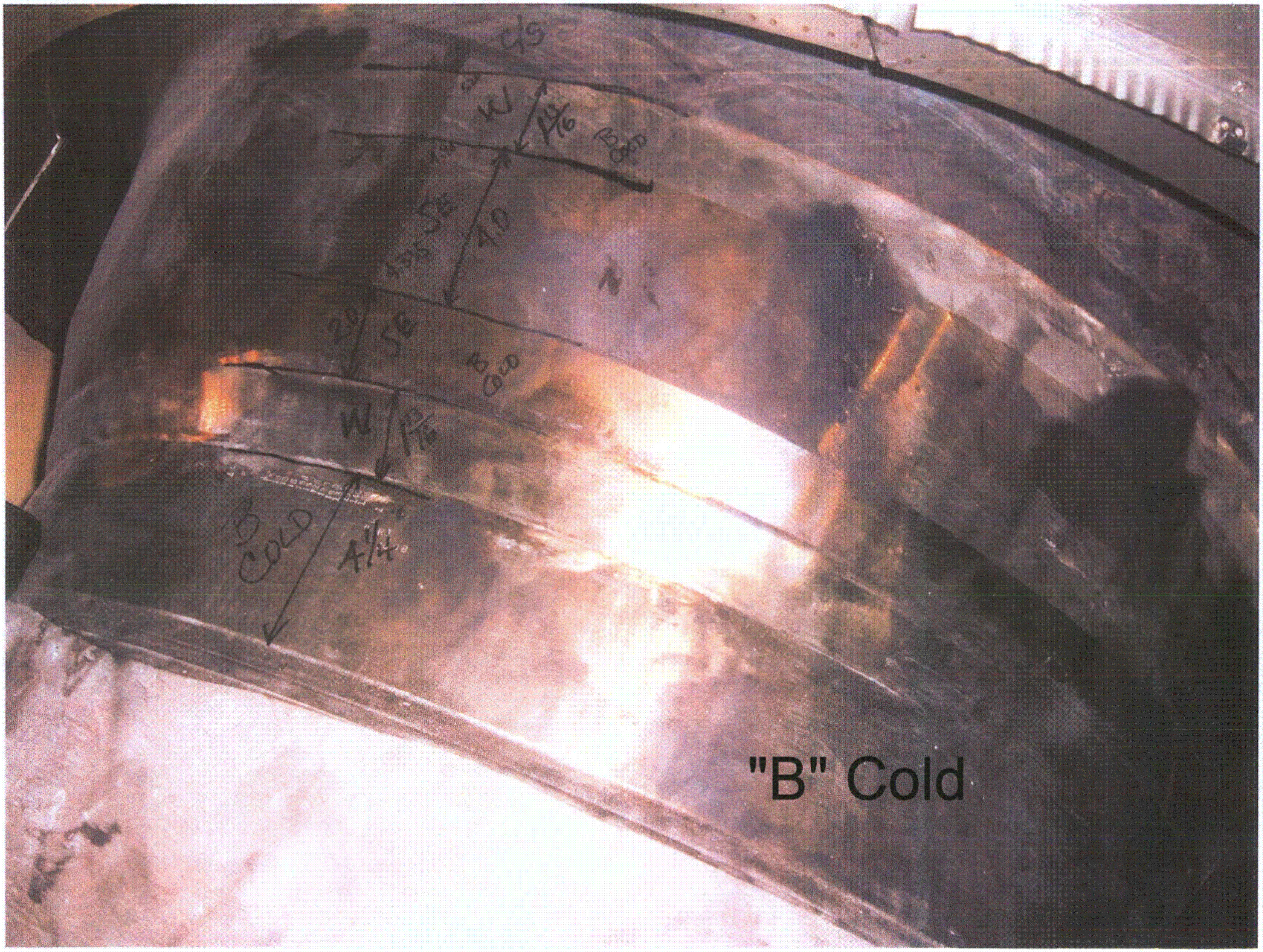
Nominal Piping Diameter: 31" ID
Nominal Piping Thickness: 2.625"

#	Description	Dim	#	Description	Dim
D_1	Nozzle Taper to Butter	1.6"	A_1	Weld and Safe End Surface Angle	22
D_2	Buttering Width *	.5"	A_2	Safe End Tangent Surface Angle	9
D_3	DM Weld Width *	1.32"	T_1	Nozzle Thickness	5.20"
D_4	DM Weld to Safe End Tangent	4.0"	T_2	Safe End Thickness, Upper	4.90
D_5	Safe End Tangent to Elbow Weld	2.0"	T_{2a}	Safe End Thickness, Tangent	4.335"
D_6	Elbow Weld Width	1.82"	T_3	Safe End Thickness at Weld	3.1"
D_7	Weld to BM Restriction	4.25"	T_4	Nominal Elbow Thickness	2.625"

Comments: * Assumed dimension from combined width of 1.813"




"B" Cold
C/S
W
4.96
SE
4.0
4.335
SE
2.0
W


"B" Cold


"B" Cold

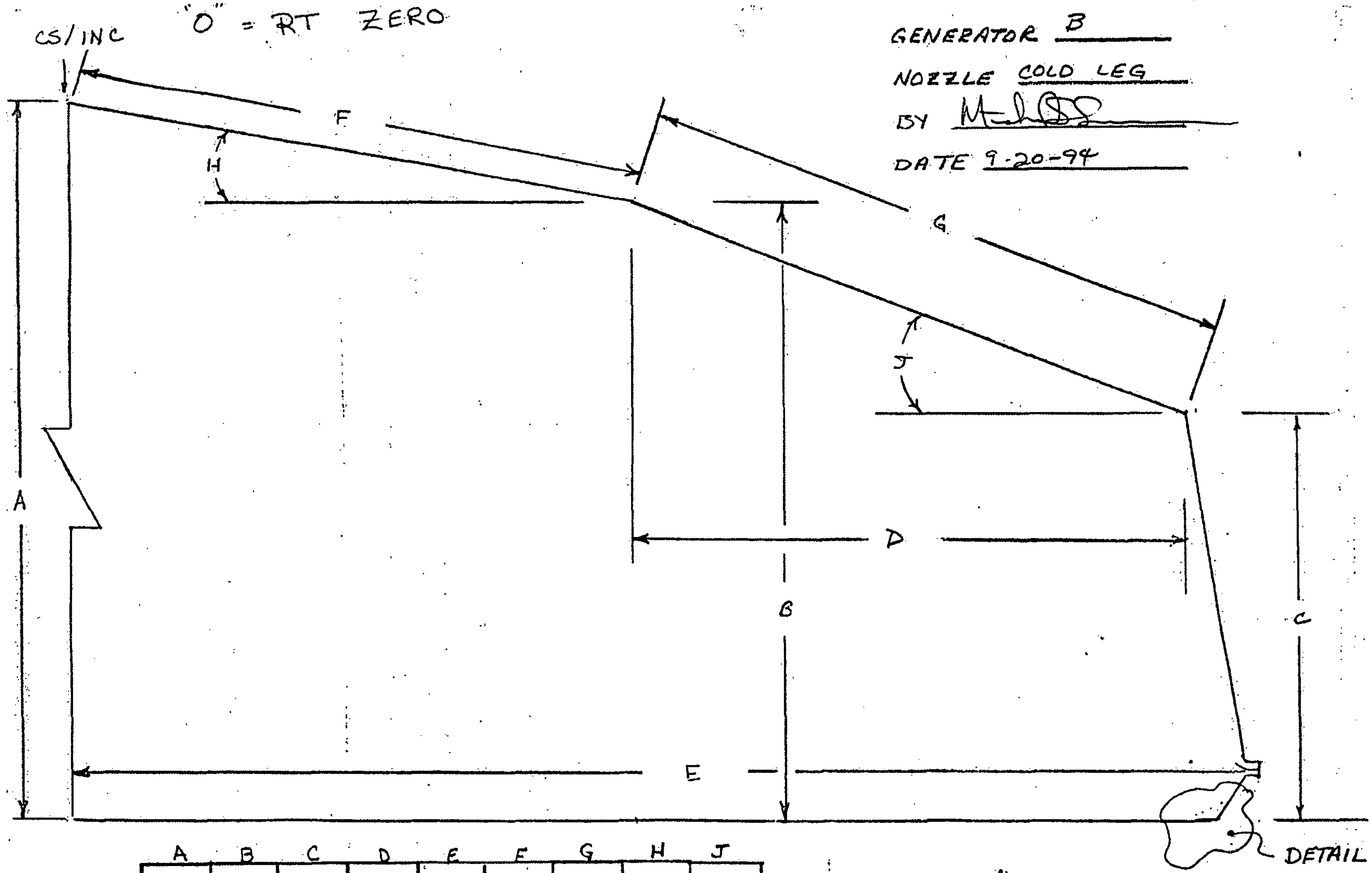

"B" Cold

GENERATOR B

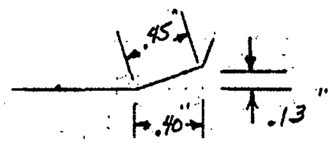
NOZZLE COLD LEG

BY [signature]

DATE 9-20-94



	A	B	C	D	E	F	G	H	J
0°	4.989	4.229	3.052	2.95	8.395	5.085	2.995	8.6°	23.1°
90°	5.079	4.023	3.416	1.40	8.237	6.273	1.678	9.7°	21.2°
180°	5.024	4.169	3.173	2.87	8.058	5.158	2.794	9.5°	20.9°
270°	5.008	4.400	2.915	4.00	8.440	4.106	4.040	8.5°	21.6°



DETAIL A

COUNTER BORE SHOWN IS THE MAXIMUM.

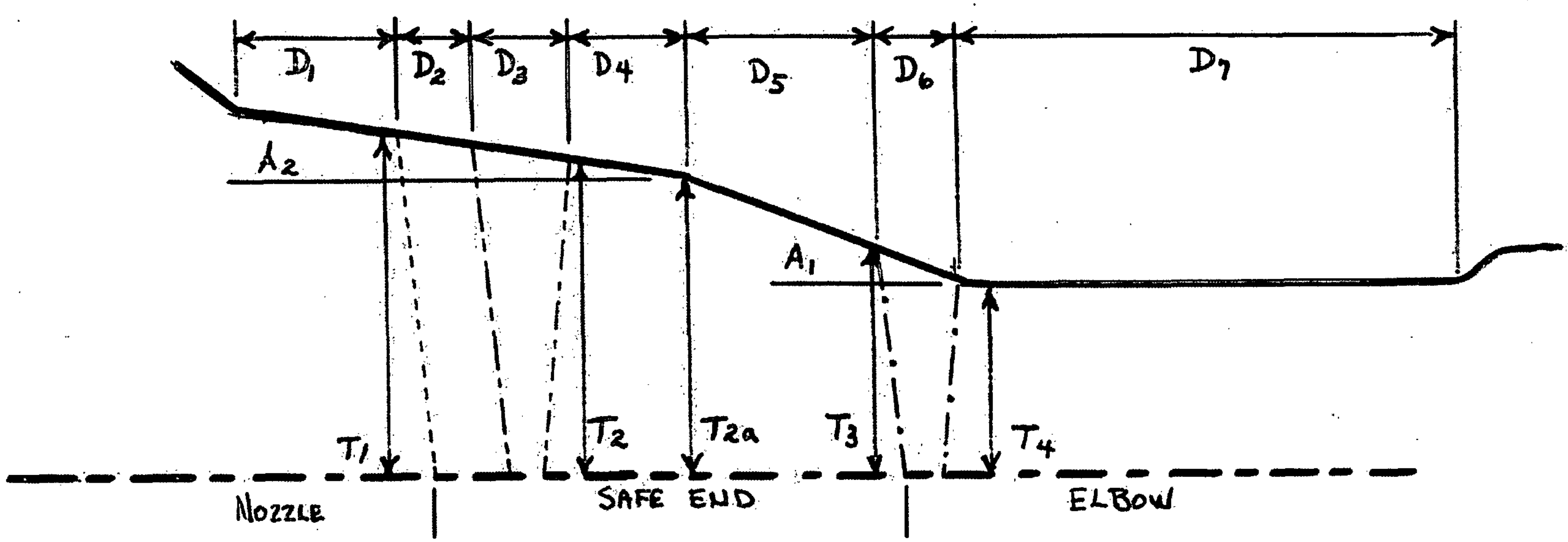
COUNTER BORE IS FROM .16" TO .54"

Plant: V. C. Summer Unit #1
Date: 6/14/2005
Component: Steam Generator "C" Hot Leg Nozzle
ISI Component ID: CGE-1-4300A-29DM

Nominal Piping Diameter: 29" ID
Nominal Piping Thickness: 2.500"

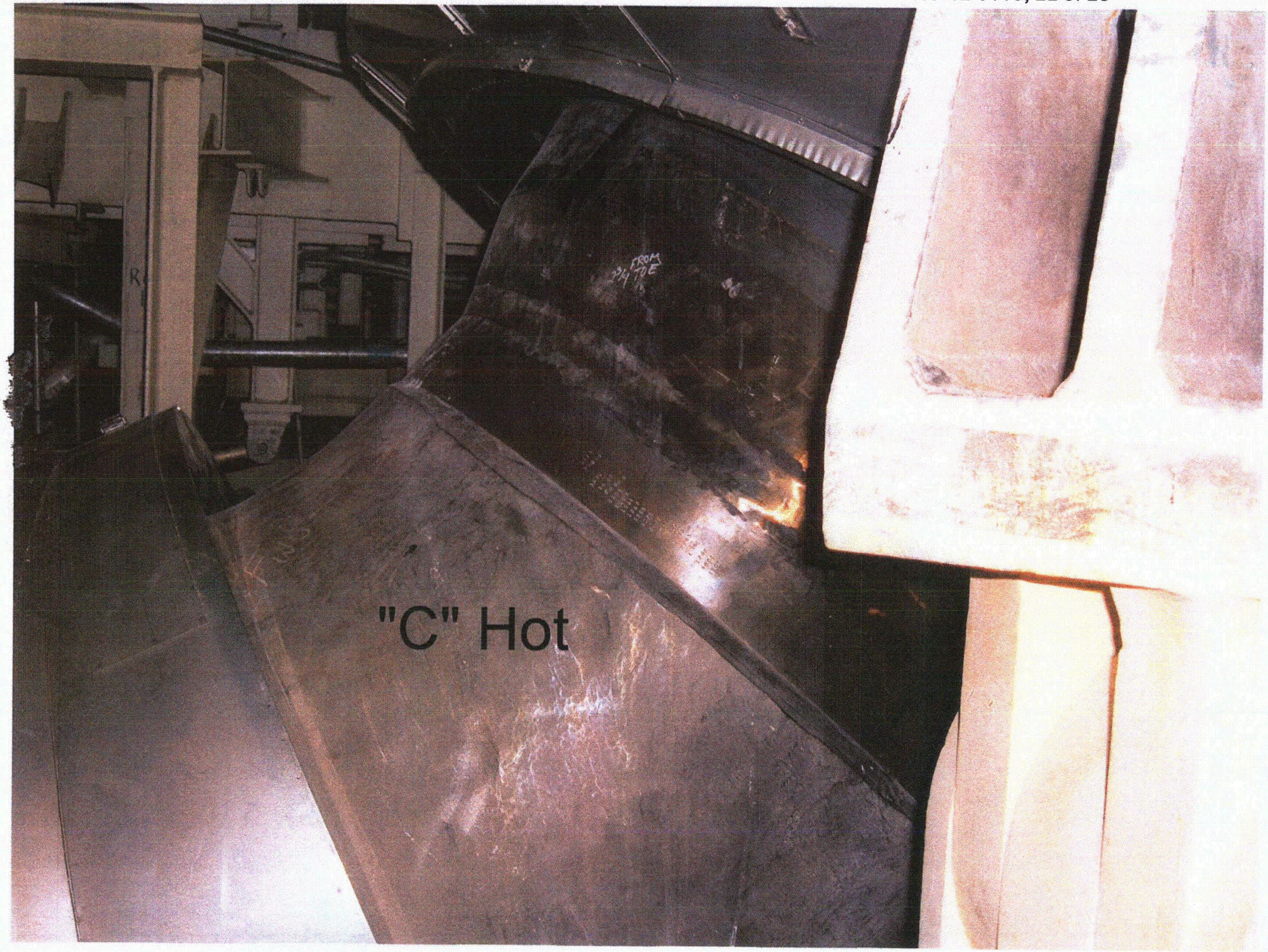
#	Description	Dim	#	Description	Dim
D_1	Nozzle Taper to Butter	1.6"	A_1	Weld and Safe End Surface Angle	23
D_2	Buttering Width *	.5"	A_2	Safe End Tangent Surface Angle	9
D_3	DM Weld Width *	1.32"	T_1	Nozzle Thickness	5.28"
D_4	DM Weld to Safe End Tangent	1.50"	T_2	Safe End Thickness, Upper	5.00
D_5	Safe End Tangent to Elbow Weld	4.50"	T_{2a}	Safe End Thickness, Tangent	4.96"
D_6	Elbow Weld Width	1.50"	T_3	Safe End Thickness at Weld	2.9"
D_7	Weld to BM Restriction	4.38"	T_4	Nominal Elbow Thickness	2.500"

Comments: * Assumed dimension from combined width of 1.82"




"C" Hot
5.00
FROM TOE


"C" Hot


"C" Hot

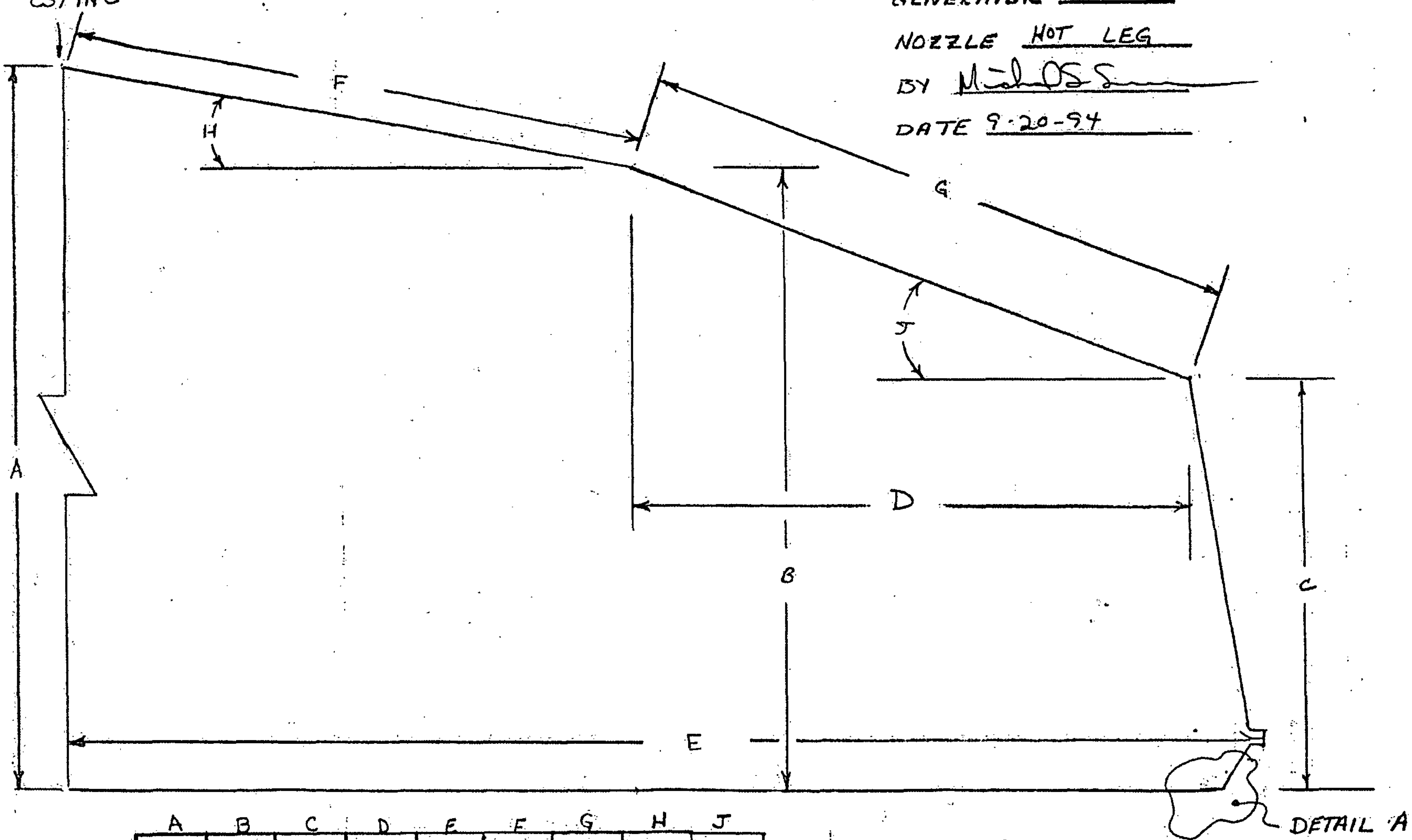
"O" IS RT ZERO

GENERATOR C

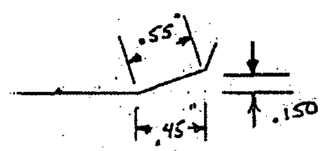
NOZZLE HOT LEG

BY

DATE 9-20-94



	A	B	C	D	E	F	G	H	J
0°	5.218	4.339	2.991	3.6	N/A	4.533	3.370	11.2°	23.6°
90°	5.118	4.590	2.870	4.1		4.250	4.127	7.1°	24.6°
180°	5.170	4.735	2.874	4.5		3.360	4.656	7.4°	23.6°
270°	5.195	4.775	3.029	4.0		3.765	4.258	6.4°	24.2°



DETAIL A

COUNTER BORE SHOWN IS THE MAXIMUM

COUNTER BORE IS FROM 88" TO 0 TO 60" CCW

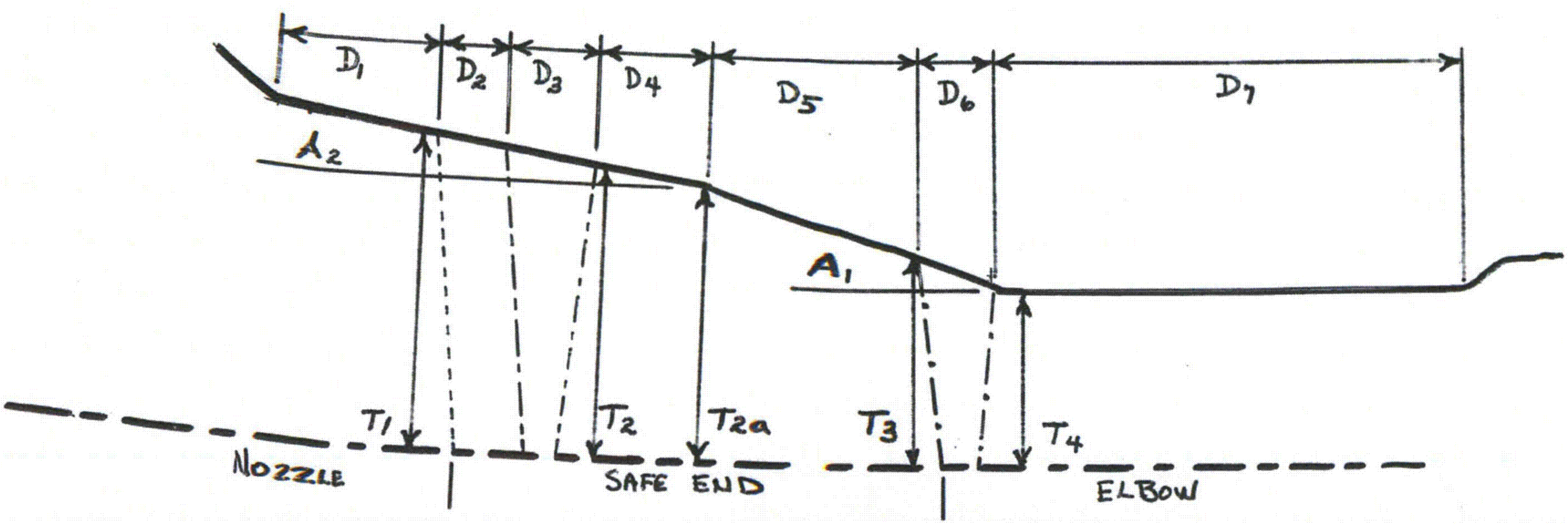
lant: V. C. Summer Unit #1
ate: 6/14/2005
omponent: Steam Generator "C" Cold Leg Nozzle
I Component ID: CGE-1-4300A-30DM

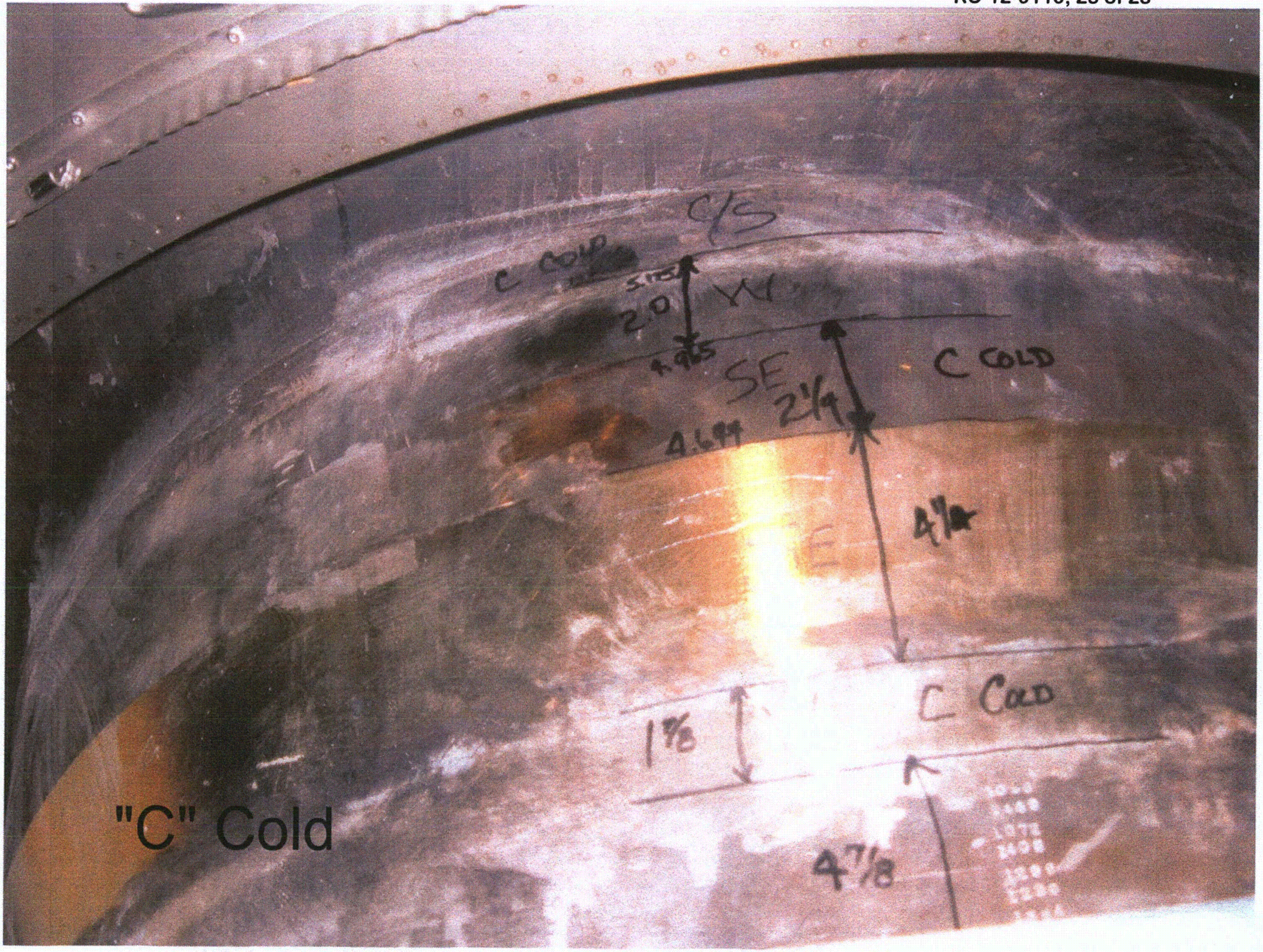
Nominal Piping Diameter: 31" ID
Nominal Piping Thickness: 2.625"

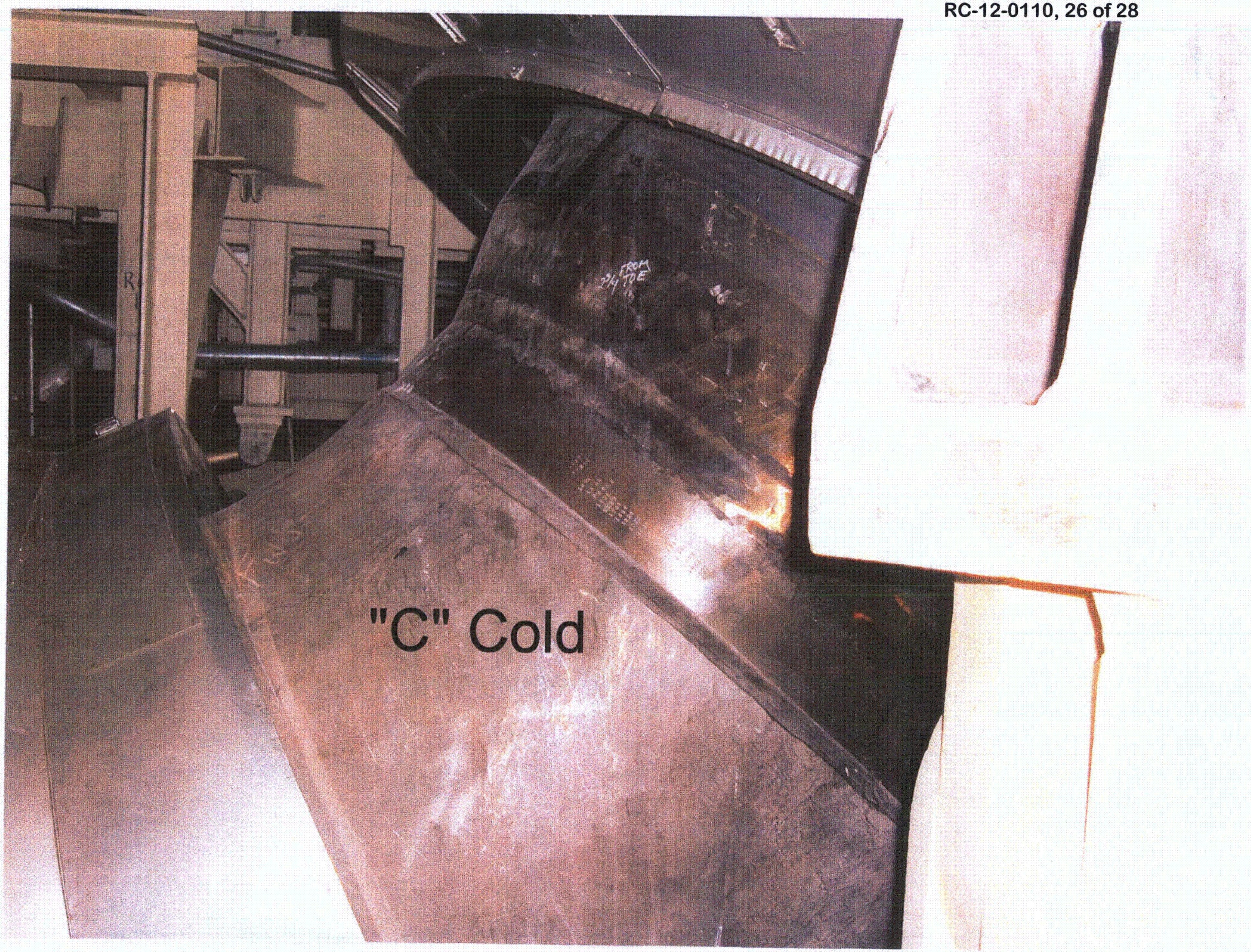
#	Description	Dim
D_1	Nozzle Taper to Butter	1.6"
D_2	Buttering Width *	.5"
D_3	DM Weld Width *	1.50"
D_4	DM Weld to Safe End Tangent	2.25"
D_5	Safe End Tangent to Elbow Weld	4.25"
D_6	Elbow Weld Width	1.88"
D_7	Weld to BM Restriction	4.88"

#	Description	Dim
A_1	Weld and Safe End Surface Angle	22
A_2	Safe End Tangent Surface Angle	9
T_1	Nozzle Thickness	5.12"
T_2	Safe End Thickness, Upper	4.965"
T_{2a}	Safe End Thickness, Tangent	4.644"
T_3	Safe End Thickness at Weld	2.9"
T_4	Nominal Elbow Thickness	2.625"

Comments: * Assumed dimension from combined width of 2.00"




C/S
C COLD
SE
C COLD
C COLD
"C" Cold


"C" Cold

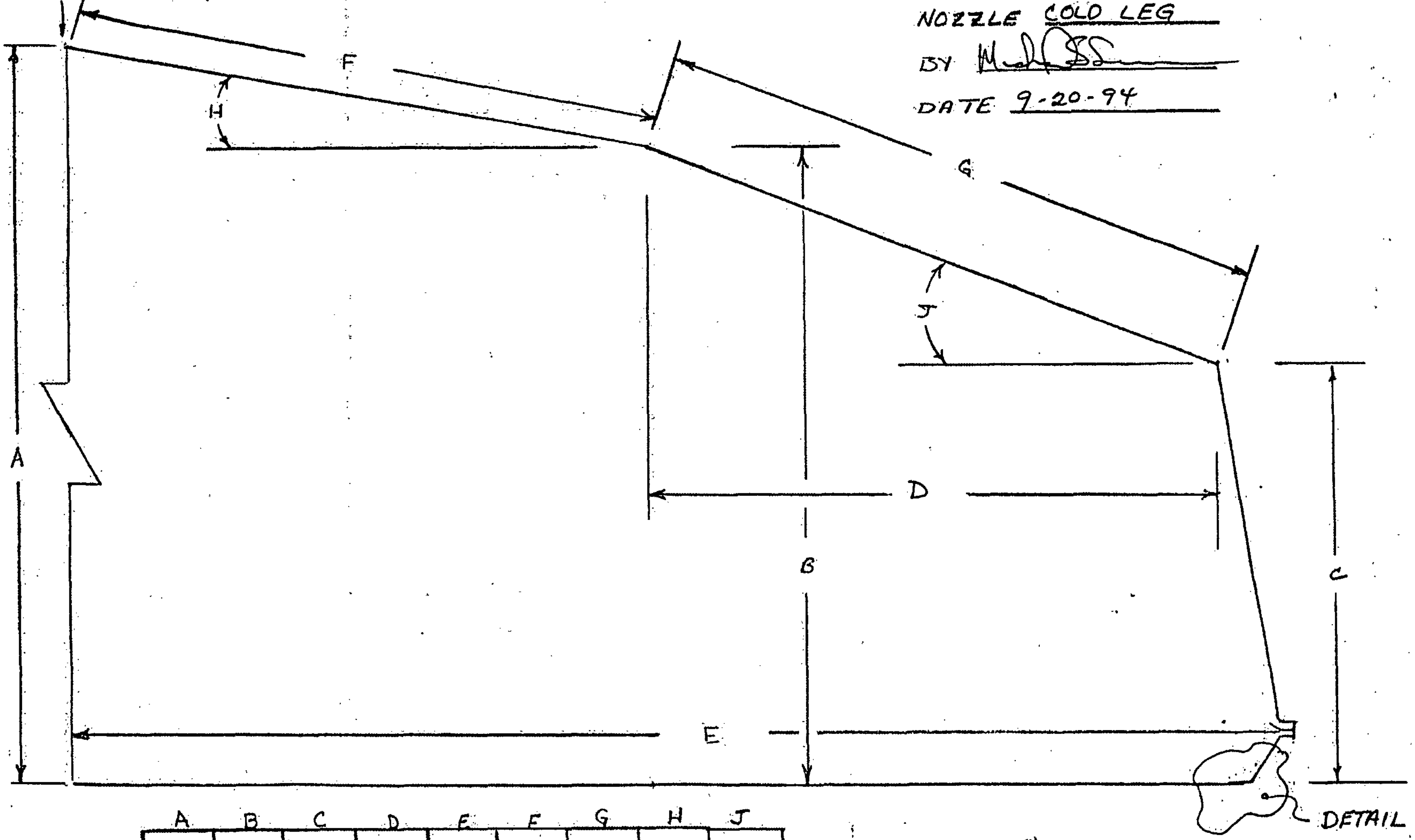
1. MEASUREMENTS ARE TAKEN AT LUGS. LUG A IS 0°, LUG B IS 270°.

GENERATOR C

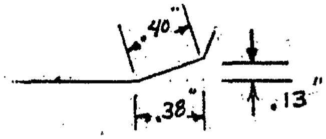
NOZZLE COLD LEG

BY [signature]

DATE 9-20-94



	A	B	C	D	E	F	G	H	J
0°	5.105	4.500	2.962	3.98	8.5	4.124	4.031	8.4°	22.4°
90°	5.151	4.408	3.011	3.94	8.5	4.325	3.879	9.9°	21.1°
180°	5.160	4.465	2.918	3.90	8.5	4.189	4.168	9.6°	21.8°
270°	5.048	4.502	2.859	4.03	8.5	3.838	4.325	8.1°	22.3°



DETAIL A
COUNTER BORE SHOWN IS THE MAXIMUM
COUNTER BORE IS FROM 44" TO 0 TO 16"
CCW.


"C" Cold