Records Already Publicly Available in ADAMS

1. **ML15104A660** – Indian Point, Units 2 & 3 – Revised 10 C.F.R. 50.59 Safety Evaluation and Supporting Analyses Prepared in Response to the Algonquin Incremental Market Natural Gas Project, dated April 8, 2015.

2. **ML110390554** – Draft Regulatory Guide DG-1270, "Evaluation of Explosions Postulated to Occur at Nearby Facilities and on Transportation Routes Near Nuclear Plants", 1.91 Draft Rev. 2, dated July 31, 2011.

3. **ML12170A980** – Regulatory Guide DG-1270, "Evaluation of Explosions Postulated to Occur at Nearby Facilities and on Transportation Routes Near Nuclear Plants", 1.91 Revision 2, dated April 17, 2013.

4. **ML20056F095** - Office of the Inspector General, "Concerns Pertaining to Gas Transmission Lines at the Indian Point Nuclear Power Plant," Event Inquiry, Case No. 16-024, dated February 13, 2020.

5. **ML083180126** – Calvert Cliffs, Unit 3, "Submittal of Response to Requests for Additional Information for the Set No. 9 External Hazards", dated November 11, 2008.

6. **ML092180424** – Calvert Cliffs, Units 1 and 2, "Safety Evaluation Regarding Revisions to Hazards Analysis Related to Liquified Natural Gas Plant Operations at Cove Point", dated October 28, 2009.

7. **ML13296A035** – Calvert Cliffs Nuclear Power Plant, Unit 3, "Response to Request for Additional Information for the RAI 397 Evaluation of Potential Accidents", dated October 18, 2013.

8. **ML19030A283** – Clinch River Nuclear Site, Early Site Permit Application, Part 02 Site Safety Analysis Report (SSAR) (Rev.2) – Chapter 02 – Site Characteristics – Section 02.02 – Nearby Industrial, Transportation, and Military Facilities, dated January 18, 2019.

Exhibit 1

Declaration of Paul Blanch

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

CITY OF BOSTON, DELEGATION	)	**DOCKET NO. 16-1081 consolidated with 16-1098, 16-1103**
TOWN OF DEDHAM, MASSACHUSETTS	)	
RIVERKEEPER, INC. ***et al.*** **PETITIONERS**	)	
v.	)	
FEDERAL ENERGY REGULATORY COMMISSION	)	

DECLARATION OF PAUL M. BLANCH

Pursuant to 28 U.S.C. § 1746, Paul M. Blanch hereby declares as follows:

1. My name is Paul M. Blanch and I reside at 135 Hyde Road, West Hartford CT 06117.

2. I am a registered Professional Engineer (inactive status) with more than 50 years of experience with nuclear safety and the construction and operation of nuclear power plants.[1] As such, I am intimately familiar with all federal regulations governing the design and operation of nuclear power plants.

3. I was a consultant to the Chief Nuclear Officers at Indian Point while its present owner, Entergy, operated it as well as its previous owners, Consolidated Edison and the New York Power Authority.

4. I served as an expert witness for the Attorney General of the State of New York for the Nuclear Regulatory Commission proceedings on the license renewal applications for Indian Point Units 2 and 3.

5. I also have extensive experience as a professional consultant on nuclear issues to the top management of Northeast Utilities, Dominion Nuclear, Millstone Nuclear Power Station, and Maine Yankee.

[1] See attached CV.

6. The expert opinions I express in this declaration are based on my thorough analysis of Entergy and NRC's calculations, meetings with the NRC, FOIA requests, formal petitions, NRC Petition Review Board meetings, conference calls with the NRC and with PHMSA, and my review of hundreds of documents related to the AIM project.

7. On September 27, 2014, I formally submitted my expert opinions to FERC related to the potential impact of the proposed Algonquin Incremental Market (AIM) pipeline expansion (FERC Docket No. CP14-96-000) on the safe operation of the Indian Point Nuclear Plant.

8. While I agree that Congress has given the NRC exclusive jurisdiction over nuclear power plant safety, here the NRC is not properly fulfilling its mandate to protect the public and has never presented any reliable analysis to FERC supporting their conclusions that the safety risk that placing the AIM pipeline next to the Indian Point nuclear power plant is acceptable.

9. The NRC issues Regulatory Guides to provide acceptable means of satisfying the requirements of its regulations (10 CFR). For the identified external hazard as applied in this case, the NRC issued Regulatory Guide 1.91 (RG 1.91) entitled "Evaluations of Explosions Postulated To Occur At Nearby Facilities And On Transportation Routes Near Nuclear Power Plants", which was last revised in 2013.[2] The intent of this guidance document is to ensure that adequate protection is provided to the public from harm and radiation exposure from external events. This guide discusses how to calculate a blast radius from a nearby gas pipeline, the probability of a catastrophic gas pipeline failure, the impact of vapor clouds, heat generated and jet fires from a gas line failure. References are included in the RG for more detailed evaluations. There are no other methodologies approved by the NRC for evaluating the impact of a gas line release other than RG 1.91.

10. ALOHA is a computer program developed by EPA for use in assessing the impact of chemical releases including releases from gas lines. However, the EPA specifically prohibits the use of this program for modeling a "gas release from a pipe that has broken in the middle and is leaking from both broken ends", which is the scenario that the NRC and Entergy analyzed in the ALOHA program.[3] The ALOHA program is not mentioned or referenced in RG 1.91 as an acceptable method for calculating blast radius and risk, thus unapproved for this postulated event.

11. All analyses conducted by the NRC, Entergy, and its consultant, The Risk Research Group, Inc., of the safety risk of placing the AIM pipeline next to Indian Point, including the confirmatory and bounding analysis, relied primarily upon the

[2] The 2013 version of NRC RG 1.91 is available on the NRC website at ADAMS database accession number: ML12170A980.

[3] EPA Aloha User's Manual (February 2007) at 146, available at https://nepis.epa.gov

use of the ALOHA program. However, they have never provided a basis for deviating from the methods approved by the NRC in Regulatory Guide 1.91.

12. A summary of the risk analysis was submitted by Entergy to the NRC on August 14, 2014[4] and includes the following statement:

NL-14-106
Docket Nos. 50-247 and 50-286
Page 3 of 4

~~**SECURITY-RELATED INFORMATION – WITHHOLD UNDER 10 CFR 2.390**~~

Release of Natural Gas from the Proposed New AIM 42" Pipeline Taking a Southern Route Near IPEC and an Analysis of the Causes of and (2) Determination of Exposure Rates Associated with a Failure of the Proposed AIM 42" Natural Gas Pipeline Near IPEC (also enclosed and collectively referred to as the "Hazards Analyses"). Both supporting analyses were prepared for Entergy by The Risk Research Group, the consultant that prepared the hazards analysis for the existing pipelines near IPEC.

13. Contrary to the requirements of RG 1.91, the Risk Research study[5] performed for Entergy projected a maximum impact radius from a jet fire of between 1,155 feet and 1,266 feet for damaging blast effects based solely on the prohibited ALOHA program.

14. RG 1.91 provides the following clear and simple equation for determining the blast radius from a gas line rupture. Again, the NRC has no other acceptable equation for the calculation of a blast radius

$$R_{min} = Z * W^{\frac{1}{3}} \qquad (1)$$

where

R_{min} = distance from explosion where P_{so} will equal 1.0 psi (6.9 kPa) (feet or meters)
W = mass of TNT (pounds or kilograms (kg))
Z = scaled distance equal to 45 ($ft/lb^{1/3}$) when R is in feet and W is in pounds
Z = scaled distance equal to 18 ($m/kg^{1/3}$) when R is in meters and W is in kilograms

A safe distance from a source of potential explosion to critical plant structures would be equal to or greater than R_{min}.

15. This NRC equation states that the damaging blast radius is proportional to the amount of gas or energy released during the event. The amount of gas released (W in the equation above) is calculated by multiplying the gas release flow rates by the amount of time the gas continues to flow before the rupture is isolated and then by the 5% yield number used by NRC and the conversion of kilograms of methane to TNT. Therefore, if the gas release is terminated immediately, the

4 Letter from Entergy, NL-14-106, dated August 21, 2014.

5 "Consequences of a Postulated Fire and Explosion Following the Release of Natural Gas from the Proposed New AIM 42" Pipeline Taking a Southern Route Near IPEC Prepared for Entergy Nuclear Operations. Inc. by The Risk Research Group. Inc., 18 Dogwood Road, West Orange. NJ, Dated August 19, 2014".

blast radius will be small. If the release continues for a prolonged period, the blast radius will be much greater.

16. I obtained a copy of Entergy's and the NRC's calculations under the Freedom of Information Act. The calculations performed by Entergy and the NRC both assumed that the gas flow in the AIM pipeline could be isolated and terminated within 3 minutes. However, as explained in more detail in the Declaration of pipeline safety expert Richard Kuprewicz, there is no basis for this unrealistic assumption.

17. The NRC stated in response to a FOIA request[6] that the flow rates for gas released from a rupture of the AIM pipeline will be 376,000 kilograms per minute for the first minute, 200,000 kilograms per minute for the next minute, and 100,000 kilograms per minute until the gas line is isolated. This statement originated[7] from the Risk Research study dated August 19, 2014.

18. However, if one uses the flow rate numbers provided by NRC along with the NRC's assumption that the gas flow will terminate within 3 minutes, the calculation using the RG 1.91 equations results in a blast radius of about 1,905 feet rather than the 1,155-1,266 foot blast radius calculated by Risk Research Group using the ALOHA program. The NRC relied on this much less conservative and unreliable blast radius in its safety assessment rather than the blast radius that would have been calculated using its own regulatory guidance and stated assumptions.

19. My calculation using the above flow rates provided by the NRC and a realistic gas flow isolation time of 60 minutes in the equation from RG 1.91 results in a blast radius of greater than 4,000 feet, which would encompass the entire nuclear plant site. Even assuming a less realistic isolation time of 30 minutes, the blast radius would be 3,255 feet, encompassing both reactor units 1 and 3 and most of reactor unit 2.

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6 NRC internal email dated April 27, 2015:

"Based on an average release rate of 1877 kg/s for a 360-second period. This rate comprises the release of 376,000 kg in the first minute (from ALOHA), a release of 200,000 kg in the next two minutes (accounting for the pressure drop) and 100,000 kg after valve closure. This last will take an additional 3 minutes after the valves are closed (from ALOHA)."

7 Risk Research Group, Inc Analysis dated August 19, 2014

[23] **Based on an average release rate of (b)(7)(F) This rate comprises the release of (b)(7)(F) in the first minute (from ALOHA), a release (b)(7)(F) in the next two minutes (accounting for the pressure drop) and (b)(7)(F) after valve closure. This last will take an additional 3 minutes after the valves are closed (from ALOHA).**

~~SECURITY-RELATED INFORMATION – WITHHOLD UNDER 10 CFR 2.390~~

The Risk Research Group, Inc. 23 August 19, 2014

20. A blast radius in the range of 3,000 to 4,000 feet would likely disable structures, systems and components (SSCs) that are necessary to prevent core melting and major radioactive releases to the environment. The impact on the Indian Point site may disable all safety systems similar to the catastrophic nuclear event at Fukushima. None of the safety systems at Indian Point have been designed or analyzed to withstand the projected blast effects.

21. On March 24, 2015, NRC Chairman Burns testified before Congress and was questioned by Congresswoman Lowey as to why the EPA's ALOHA program was used for this analysis rather than the methodology required by RG 1.91.[8] Chairman Burns stated that RG 1.91 could not be used for this analysis because it did not address "vapor cloud" explosions and heat flux. This is an inaccurate statement to a member of Congress by the NRC Chairman. RG 1.91 discusses "vapor clouds" and their impact 10 times in RG 1.91. References provided in the RG provide other guidance for addressing heat flux. None of the references suggest the use of ALOHA for evaluating the risk of a gas line release.

22. As a direct result of inquiries from Congressional Representatives to the NRC Chairman questioning the NRC's assumption of a 3-minute valve isolation time, the NRC conducted a "bounding" analysis assuming a gas release for one hour. This bounding analysis used an energy release inconsistent with previous values[9] provided by the NRC and also used the prohibited ALOHA program. If the NRC had used its published release rates in the RG 1.91 equation the blast radius after 60 minutes is calculated to be about 4,000 feet.

23. At the Turkey Point Nuclear facility in Florida, the NRC properly using RG 1.91 analyzed the safety risk of a 22-inch gas line with an operating pressure of 722 PSI.[10] This analysis projected a blast radius of 3,097 feet. Comparatively, the AIM project involves a significantly larger pipeline (42 inches) with a higher design pressure of 850 psi and yet the NRC projected a blast radius of only about 1,200 feet (less than half of the blast radius they calculated for a smaller diameter and lower pressure pipeline near Turkey Point).

24. NRC Regulatory Guide 1.91 specifies the probability of a catastrophic gas pipeline failure that the NRC finds to be acceptable to meet the NRC regulations. This regulatory guide clearly states that if the probability of a pipeline event occurs at a frequency of less than 1 in 10 million per year ($1x10^{-7}$ per year) then this risk is acceptable. I consider this risk to be reasonable if it is reliably calculated in accordance with accepted engineering principles.

25. The NRC and Entergy both claim that the probability of a pipeline accident near

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8 See video of testimony, available at https://www.youtube.com/watch?v=umWpVZTqoJE.

9 Internal NRC email from David Beaulieu dated April 27, 2015.

10 See attached Turkey Point Units 6 & 7 COL Application Part 2 – FSAR at 2.2-23 – 2.2-25.

Indian Point is acceptable because they have calculated it to be less than 1 in 10 million per year (or 1×10^{-7} per year). However, it is my expert opinion that the actual failure probability of the AIM pipeline is in the range from 1 in 1000 to 1 in 10,000 per year, which is completely unacceptable and inconsistent with the requirements of 10 CFR Part 100 and RG 1.91. Put in perspective, according to NTSB statistics, there are approximately 37 million commercial airline flights per year with about 10 fatal crashes per year, or 1 crash in 3,700,000 commercial flights per year. The probability of a nuclear event at Indian Point due to a gas line failure is in the range of 1 in 1000 to 1 in 10,000 events per year, which is significantly greater than those of the commercial airline industry. This probability is completely unacceptable for a nuclear plant and ignores the NRC's mandate to protect the public.

26. The NRC's calculation of the probability of a pipeline explosion states:

> **DETERMINATION OF EXPOSURE RATE FOR FAILURE OF THE AIM PROJECT PIPELINE NEAR IPEC**
>
> **Based on Pipeline Hazardous Materials Safety Administration (PHMSA) data (www.phmsa.dot.gov), and also published information from "Handbook of Chemical Hazards Analysis Procedures" (Reference 5), the accident rate of pipes greater than 20 inches diameter is about 5×10^{-4}/mile-yr. Assuming 3 miles of AIM Project pipeline near IPEC, the accident rate is determined to be 1.5×10^{-3}/yr. Based on the information in these references, estimating 1 percent of accidents result in a complete pipe break or 100 percent instantaneous release, and assuming also only 5 percent of the time that the released gas becomes ignited leading to potential explosion, the explosion frequency for the AIM project pipeline near IPEC is calculated to be about**
> **7.5×10^{-7}/yr. If this release is due to the underground pipe, the frequency of explosion will be further reduced by at least an order of magnitude. In addition, the frequency of a large radioactivity release from the reactor due to the frequency of the above pipe rupture event, considering operating reactor conditional core damage frequency (CCDF), would be at least a few orders of magnitude lower, and therefore would not be identified as a design basis event. Therefore, it is concluded that the pipe failure resulting in a methane release from the proposed AIM Project near IPEC, would not reduce any further the existing safety margins, and would not pose a threat to the safe operation of the plant or safe shutdown.**

27. The above clearly states that the failure rate, according to PHMSA data and the FEMA, DOT and EPA Handbook of Chemical Hazards Analysis Procedures, Section 11 (Reference 5) is projected to be 1.5 pipeline failures in 1000 per year (1.5×10^{-3}) within the proximity of Indian Point, a number that exceeds the NRC's acceptable probability rate by a factor of more than 1000 times.

28. Without any reliable basis, the NRC and Entergy then reduced this unacceptable probability by citing Reference 5, Section 11 of RG 1.91 as a justification. The number they used for the failure rate for pipelines greater than 20 inches in diameter is accurate however the probability reductions citing 1 percent for a complete break, a 5 percent ignition rate, and a further reduction of at least an

order of magnitude for an underground pipe are not discussed in Reference 5 and are otherwise unsupported. Pipeline safety expert, Richard Kuprewicz, explains in more detail in his Declaration why these assumptions are unrealistic.

29. A nuclear facility in Eunice, New Mexico was proposed to be located within 1.8 miles of a 16-inch gas line operating at a pressure of less than 50 psi. This pipeline in New Mexico has less than 5% of the capacity (flow) of the new AIM pipeline. The AIM pipeline will operate at a pressure 50 times greater than the pressure of the New Mexico pipeline found to present an unacceptable risk. This line is located at a significantly greater distance away from the Indian Point nuclear facility. A study required by the NRC determined that the consequences of a pipeline explosion near the proposed nuclear facility were unacceptable and not in compliance with NRC regulations.[11] This event was analyzed using the same RG 1.91 requirements that should have been used for analyzing the AIM pipeline.

30. In conclusion, the NRC has underestimated the probability of a gas line accident impacting the Indian Point nuclear plant by at least a factor of 1000. Moreover, the NRC and Entergy have failed to provide any supportable documentation that Indian Point can safely shut down the plants in the event of a gas line rupture, and Entergy has no emergency procedures in place at Indian Point to respond to a gas line rupture. The blast radius from a gas line rupture would likely encompass the entire Indian point site, disabling all vital equipment required to prevent core damage and major radioactive releases to the environment.

31. It is my expert opinion that once gas is introduced into the AIM pipeline there will be a grave and imminent danger to the surrounding area and residents. The consequences of a nuclear event at Indian Point may impact millions of lives in the Hudson Valley and New York City and cause social and economic impacts in the trillions of dollars range.[12]

32. It is my professional expert opinion that a transparent and independent risk analysis must be conducted consistent with NRC regulations 10 CFR Part 50, Regulatory Guide 1.91, and the requirements of DOT/PHMSA 49 CFR §192.935 and ASME B31.8(S) prior to pressurized gas being introduced into the AIM pipeline.

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[11] See attached Framatome ANP Calculation 32-2400572-02, "Natural Gas Pipeline Hazard Risk Determination" dated January 19, 2004.

[12] This estimate is based on the contamination and land condemnation resulting from the Fukushima accident, recovery and disposal costs, and the estimated property values in the areas surrounding Indian Point.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 16, 2016.

Paul M. Blanch

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Paul M. Blanch

1. P. Blanch CV
2. Entergy to NRC re: Safety Evaluation Prepared in Response to AIM Project (August 21, 2014) Indian Point Safety Evaluation prepared by Energy (August 21, 2014).
3. Hazards Analysis: Consequences of Postulated Fire and Explosion Following Release of Natural Gas From Proposed AIM Pipeline, prepared for Entergy by Risk Research Group (August 19, 2014).
4. NRC Internal Email from D. Beaulieu to D. Pickett (April 27, 2015).
5. Turkey Point Units 6 and 7 COL Application, Part 2 -FSAR at 2.2.2-2.2.-25
6. Attachment 2: Calculation 32-2400572-02, "Natural Gas Pipeline Hazard Risk Determination" by Framatome ANP

P. Blanch CV

Resume

Paul M. Blanch
135 Hyde Road,
West Hartford, CT 06117
860-236-0326

OVERVIEW

A 50+ year professional consulting to the top management of Northeast Utilities, Dominion Nuclear, Millstone Nuclear Power Station, Indian Point and Maine Yankee and with a distinguished career as an engineer, engineering manager and project coordinator for the construction and operation of nuclear power plants. Intimately familiar with all regulations governing the design and operation of commercial Nuclear Power Plants

An expert witness having provided research and testimony for numerous plaintiffs including the State of New York Attorney General, Three Mile Island, Vermont Yankee, Saint Lucie, Millstone, Seabrook, Indian Point and Davis Besse.

Provided testimony on behalf of federal and private nuclear workers before State and Federal Courts and the Merit Systems Protection Board (MSPB).

Developed computer research tools and programs to access, search and analyze publically available documents from the Nuclear Regulatory Commission (NRC).

EXPERIENCE

EXPERT WITNESS FOR RIVERKEEPER RELATED TO THE SAFETY AND FEASIBILITY OF COOLING TOWERS FOR INDIAN POINT UNITS 2 AND 3. --2015 T0 PRESENT

Provided expert testimony before the New York State court about the safety of Indian Point be required to install cooling towers in lieu of present once through cooling.

CONSULTANT TO NUMEROUS PUBLIC INTEREST GROUPS RELATED TO THE PROPOSED INSTALLATION OF A NEW NATURAL GAS LINE IN THE CLOSE PROXIMITY TO THE INDIAN POINT POWER PLANTS--2013 TO PRESENT

I continue to work with public interest groups, US Senators, Congresspersons, and other elected officials about the potential impact of a new 42-inch natural gas line crossing the Indian Point property. I am working with the NRC and have met with the NRC Chairman and other Commissioners for the purpose of conducting a risk assessment should a malfunction of the new gas line occur. Also working with the Department of Transportation (PHMSA), and the Federal Energy Regulatory

Commission (FERC) and the NY Governor's office.

EXPERT WITNESS FOR NEW STATE ATTORNEY GENERAL SUPPORTING NEW YORK'S POSITION RELATED TO THE RELICENSING OF INDIAN POINT UNITS 2 AND 3 (IP 2&3) –April 2007 to 2012

Provided expert witness research and testimony on behalf of the State of New York on the relicensing of the Indian Point units. Researched the design basis for IP 2&3 and provided the basis for age related contentions submitted on behalf of the State of New York to the NRC within the scope of the relicensing requirements of 10 CFR 54. The Atomic Safety Licensing Board accepted four out of five contentions related to buried piping systems, inaccessible cable qualification and the life management of vital transformers.

EXPERT WITNESS FOR VARIOUS PUBLIC INTEREST GROUPS SUPPORTING THEIR POSITION RELATED TO THE RELICENSING OF THE SEABROOK NUCLEAR PLANT -2010 to present

Provided expert witness research and testimony on behalf of various public interest groups opposing the relicensing of Seabrook.

EXPERT WITNESS FOR NEW ENGLAND COALITION (NEC) vs. ENTERGY NUCLEAR REVIEWING THE EXTENDED POWER UPRATE AND RELICENSING OF VERMONT YANKEE—2004 to present

Provided pro bono expert witness research and testimony on behalf of NEC opposing the 20% Extended Power Uprate (EPU) for Vermont Yankee (VY). Researched the design basis for VY and provided testimony before the Vermont Public Service Board, Public Service Commission, Atomic Safety and Licensing Board (ASLB) and the Advisory Committee for Reactor Safety (ACRS). Participated in meetings with Vermont Governor Douglas, Senators Leahy and Jeffords. Petitioned the NRC under 10 CFR 2.206 to request VY and the NRC identify any and all non-compliances with present NRC regulations and evaluate risks associated with identified non-compliances to the General Design Criteria of 10 CFR 50 Appendix A and other applicable NRC regulations.

EXPERT WITNESS FOR PLAINTIFFS IN FINESTONE vs. FLORIDA POWER AND LIGHT -AUGUST 2003 to JANUARY 2006

Provided expert witness and conducted extensive historical research to determine the quality and quantity of unmonitored releases from the St. Lucie nuclear plant. Discovered that the plant had significant unmonitored discharges to the environment in excess of those allowed by 10 CFR 20. Case dismissed via summary judgment in 2006.

EMPLOYEE CONCERNS AND SAFETY CONCIOUS WORK ENVIRONMENT CONSULTANT -- February 2001 to February 2002

Consultant reporting to the Chief Nuclear Officer at Indian Point Unit 2 assisting in the evaluation of the plant's Employee Concerns Program and an assessment of the Safety Conscious Work Environment. (SCWE) Work also includes assisting investigations of allegations related to employee discrimination and other technical and safety issues. Developed and implemented training programs for ECP and other site personnel.

EMPLOYEE CONCERNS AND SAFETY CONCIOUS WORK ENVIRONMENT CONSULTANT -- September 2000 to 2001

Consultant, reporting to the President of Maine Yankee Atomic Power Company. Primary responsibilities include the re-establishment of a Safety Conscious Work Environment (SCWE) and to act as an independent facilitator to resolve differences between employees and management. Evaluated the Employee Concerns Program making recommendations for improvement to the President. Conducted independent investigations of allegations received internally and referral allegations from the NRC.

EMPLOYEE CONCERNS AND SAFETY CONCIOUS WORK ENVIRONMENT CONSULTANT -- February 1997 to 2001

Consultant reporting to the President of Northeast Nuclear Energy Company assisting in the recovery of the three Millstone Units shut down due to safety problems. Primary responsibilities include the establishment of a Safety Conscious Work Environment (SCWE) and to act as an independent facilitator to resolve differences between employees and management. Coordinate many different groups at Millstone including executive management, legal, human resources and the Employee Concerns organization.

Resolve differences at the lowest possible management level. Coordinate with ECP to investigate safety, technical and alleged harassment issues and review outcomes, to assure the investigation was conducted in an unbiased, fair and equitable manner. Coordinate corrective action with the appropriate management, legal and technical organizations.

Worked closely with top management and corporate communications to coordinate efforts to regain public confidence with the operation and management of the Millstone site. Provide assistance with regulatory compliance issues and interface with various public interest groups in the Millstone area including State oversight and groups critical of the Millstone operations. Provide both formal and informal feedback to the

NRC about the recovery of Millstone and the establishment of a Safety Conscious Work Environment.

Conducted training and made presentations to top nuclear executives about the need to maintain a Safety Conscious Work Environment when requested by the Nuclear Energy Institute and the Nuclear Regulatory Commission.

Made regular presentations to public interest groups, State of Connecticut oversight organizations and the Nuclear Regulatory Commission as to my personal assessment of the work environment at Millstone and the status of corrective actions.

Worked as a team member with other Millstone management providing overall strategic direction to the President to assist in the recovery of Millstone with specific emphasis on public confidence and the establishment of a SCWE.

Provide routine advice to outside legal organizations and other nuclear utility management with respect to dealing with employees raising safety concerns.

Conducted presentations (September 1999 and September 2000) to the Employee Concerns Program Forum providing a perspective on "whistleblower" issues and what management needs to do to properly address these issues.

Conducted presentation in September 2000, along with NRC Chairman Meserve, to the NRC and the NRC's Inspector General's staff on a proposal to resolve "High profile whistleblower" situations.

EXPERT WITNESS FOR PLAINTIFFS RELATED TO THE THREE MILE ISLAND 1979 ACCIDENT-1995 to 1998

Provided expert witness and conducted extensive historical research to determine the quality and quantity of unmonitored releases from the Three Mile Island plant. Discovered that the actual releases were more than 5 times the amount published by the NRC and the operator of TMI.

ENERGY CONSULTANT -- 1993 to 1997

Provided expert witness testimony and worked with the NRC to change Federal Regulations for the protection of individuals identifying safety issues at nuclear licensed facilities.

Worked with the Office of the Inspector General of the NRC to provide major input to a revision of the recently passed federal "Energy Bill" providing additional protection to Nuclear Whistleblowers. Some personnel within the NRC have referred this to as "the Blanch Amendment".

Provided advice to both attorneys and their clients to gain an understanding of the NRC and Department of Labor regulations governing the protection of whistleblowers under the Energy Reorganization Act

NORTHEAST UTILITIES -- 1972 to 1993

Supervisor of Electrical Engineering (Instrument and Control Engineering Branch)
Responsible for programs to assure plant reliability and compliance with NRC regulations. Conducted periodic training of employees and contractors to maintain continued cognizance of all corporate and station procedures and regulations. Worked as both a supervisor of an engineering organization and directed the efforts of Stone and Webster and Bechtel to assure safety and compliance during the design and construction of Millstone Units 2 & 3. Primary interface between NU, Westinghouse and Stone and Webster for the conceptual design of electrical and process instrumentation systems during construction of Millstone Unit 3. Assured compliance with all NRC electrical standards and design criteria. Member of the Millstone Nuclear Review Board responsible to the president to assure compliance with all applicable regulations.

ACCOMPLISHMENTS

Directed the development of the first real time instrumentation monitoring system for practical use in commercial nuclear plants to assess the overall safety status of the plant and to provide information to remote facilities during emergency events. This effort resulted in the identification of many instrumentation problems not previously recognized or considered "undetectable failures." As a result of these efforts, and in face of strong opposition Rosemont and the nuclear industry, the NRC issued a Bulletin (90-01) requiring all utilities to monitor Rosemount transmitters used in safety applications. A supplement to the Bulletin was issued at the end of 1992.

Recognized the inability of condensate pots to function under de-pressurization events as a direct result of NU's computerized instrument monitoring system. This is one of the most significant safety issues identified in the nuclear industry. Developed a water injection system into the reference legs that precluded the absorption of these gases. This solution was adopted by the entire nuclear industry.

Developed a program to reduce or eliminate the need for periodic calibration of analog instrumentation and the elimination of the need for pressure transmitter response time testing. The formation of an ISA Standard activity (ISA 67.06) for the development of a standard for Performance Monitoring of Safety Related Instruments in Nuclear Power Plants was a direct result of these efforts.

Received a "First Use" award from Electric Power Research Institute (EPRI) for the application of Signal Validation for the identification of failed sensors during accident, as a direct result of developing and implementing signal validation for emergency computer systems.

Worked closely with the US General Accounting Office conducting its study related to the NRC's handling of whistleblower issues in the nuclear industry and buried piping degradation.

Electrical plant and Reactor operator and Leading Petty Officer aboard the Nuclear Powered Submarine USS Patrick Henry (SSBN-599). Qualified electrical plant and reactor operator and instructor at Navy prototype reactor (S1C).

SPECIAL QUALIFICATIONS

Actively participated and contributed to studies conducted by the NRC and NU addressing the cultural problems at Northeast Utilities. Collaborated with the Fundamental Cause Assessment Team and the NRC's Millstone Independent Review Group and provided insights as to the root causes of the problems effecting the NU nuclear organization.

Named Utility Engineer of the Year (1993) by Westinghouse Electric and Control Magazine for advancing the safety of nuclear power.

Publicly recognized in October 1992 by the Chairman of the NRC (Ivan Selin) for significant contributions to nuclear safety, related to the identification of the condensate pot problems on Boiling and Pressurized Water Reactors.

Testified before the US Senate Subcommittee about the failure of the NRC's regulatory practices and the NRC's mistreatment of Nuclear Whistleblowers. Instrumental in developing Connecticut's Nuclear Whistleblower Law effective October 1, 1992 which is the strongest Whistleblower Protection Law in the country. Discussed in Time Magazine (March 4, 1996) as a contributor to nuclear safety.

Featured on Page 1 of the Wall Street Journal (03/12/1998) as a Nuclear Safety Advocate assisting the successful recovery of Millstone Units 2 and 3.

EDUCATION

BS Electrical Engineering, Magna Cum Laude, 1972, University of Hartford
Graduate courses in Mechanical and Thermodynamic Engineering
US Navy Submarine School, 1968
US Navy Nuclear Power School, 1965
US Navy Electronics Technician School, 1964

PROFESSIONAL ASSOCIATIONS

Vice Chairman, Institute of Nuclear Power Operations (INPO) Two Standards Activities in response to Three Mile Island including Post Accident Monitoring requirements.

Member of the ANS Standards Committee responsible for developing the requirements for seismic monitoring systems for nuclear power plants. (ANS 6.8.1 and ANS 6.8.2)

Worked with NEI (NUMARC) on the resolution of the common mode failures of Rosemont pressure transmitters.

Worked with the NRC and discovered (1992) a significant design error impacting all BWR's. This was a deficiency in the design of level transmitters that would have produced non-conservative reactor level errors. These errors may have exceeded 35 feet. As a result, every BWR was required to make extensive modifications to resolve this major issue.

Chairman of Two Committees for the Institute for Nuclear Power Operations (INPO) related to Three Mile Island post accident monitoring requirements and emergency response facilities.

Member of ISA 67.04 for the development of Instrument Setpoints for Nuclear Power Plants

Registered Professional Engineer - California

Exhibit 2

Declaration of Richard Kuprewicz

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

CITY OF BOSTON, DELEGATION	)	**DOCKET NO. 16-1081 consolidated with 16-1098, 16-1103**
TOWN OF DEDHAM, MASSACHUSETTS	)	
RIVERKEEPER, INC. ***et al.*** **PETITIONERS**	)	
v.	)	
FEDERAL ENERGY REGULATORY COMMISSION	)	

DECLARATION OF RICHARD KUPREWICZ

Pursuant to 28 U.S.C. § 1746, Richard Kuprewicz hereby declares as follows:

1. My name is Richard Kuprewicz and I am president of Accufacts Inc. located at 8040 161st Ave NE, #435, Redmond, WA 98052.

2. As a chemical engineer and president of Accufacts Inc., I specialize in gas and liquid pipeline investigation, auditing, risk management, siting, construction, design, operation, maintenance, training, SCADA, leak detection, management review, emergency response, and regulatory development and compliance. See attached CV.

3. I have consulted for various local, state and federal agencies, NGOs, the public, and pipeline industry members on pipeline regulation, operation and design, with particular emphasis on operation in unusually sensitive areas of high population density or environmental sensitivity.

4. I am currently representing the public as a member of the federal Technical Hazardous Liquid Pipeline Safety Standards Committee (THLPSSC), a technical committee established by Congress to advise the Pipeline and Hazardous Materials Safety Administration (PHMSA) on pipeline safety regulations. The Committee members are appointed by the Secretary of Transportation.

5. On November 21, 2014, the Town of Cortlandt submitted to FERC an expert report I had prepared on their behalf which commented on the Draft Environmental Impact Statement for the AIM Project. See attached report (R. 1633). In this report I explained my opinion

that the Safety Evaluation and Analysis for the Indian Point Nuclear Plant ("IPEC") submitted by Entergy to NRC concerning the risk associated with the 42-inch AIM pipeline is seriously deficient and inadequate.

6. A 42-inch pipeline rupture would be a far greater release event than that from the pre-existing 26- or 30-inch lower MAOP (Maximum Allowable Operating Pressure) gas transmission pipelines that had previously been operating in close proximity to IPEC.

7. A primary deficiency in Entergy's Analysis, which was approved by the NRC, is the critical assumption of a three minute response time to identify, acknowledge, and close appropriate gas mainline remote isolation valves in the event of a pipeline rupture.

8. This assumption is unrealistically optimistic, ignoring both systemic dynamics (compressor and pipeline system rupture dynamics/interactions that mask remote rupture identification), uncertainty in the SCADA monitoring that will further delay remote recognition of a pipeline rupture, and control room operator confusion and related human factors that will also easily further delay control room remote response actions of a pipeline rupture, all of which will work to drive the response time well beyond the assumed 3 minute time.[1]

9. In addition, the 3 minute assumption disregards initial release and subsequent blowdown times dictated by the laws of thermodynamics related to the rupture of pipelines, even large 42-inch gas transmission pipelines.

10. History is filled with clear examples of gas transmission pipeline rupture events generating high heat flux and multiple explosion events well past an hour. Therefore, the 3-minute response assumption in the analysis approved by NRC is highly unrealistic and not appropriate for this sensitive infrastructure site, especially with a 42-inch high MAOP pipeline.

11. On September 25, 2015, the NRC sent a letter to New York State Assemblywoman Sandy Galef responding to her concerns about the agency's analysis of the safety risk posed by the AIM pipeline project's proximity to Indian Point. My review of this letter is part of the FERC record. As explained herein the three major assumptions stated by NRC in its letter clearly demonstrate that the agency's analysis was not conservative and is seriously flawed.[2]

12. NRC stated in this letter: "Based on input from Spectra Energy, the initial analysis assumed a closure time of 3 minutes on pipeline isolation valves. In addition to the 3-

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[1] SCADA stands for Supervisory Control and Data Acquisition, which incorporates various methods to remotely monitor and control the operation of a pipeline, usually through a centralized control center that may and can be located in a different state.

[2] See Accufacts' October 12, 2015 observations on NRC's Response Letter Dated September 25, 2015 Concerning "Indian Point Nuclear Generating Unit Nos. 2 and 3 – Response to Letter Dated August 4, 2015 from New York Assemblywoman Sandy Galef" (R. 2127).

minute valve closure case, the NRC evaluated a bounding case. This second case assumes the upstream side of the ruptured pipe is connected to an infinite source of gas for 1 hour." However, a three minute closure time does not indicate how long the gas has been releasing (at incredibly high rates) out of a pipeline rupture on this specific system at this location before valve and, ironically, after valve closure. The NRC assumption also appears not to consider that gas release even with closed valves will continue at very high rates for a considerable period of time. A transient graph of mass release versus time will indicate a characteristic gas pipeline rupture fingerprint form that will dispel any attempts to quickly remotely identify, much less actually trigger, valve closure even for automatic valves. Such a graph will also reveal the case irrelevancy of a ruptured pipeline connected to an infinite source of gas for one hour in the matter of this safety analysis.

13. The NRC also stated: "The NRC staff modeled a pipe break at the location closest to plant structures. Because of a limitation of the ALOHA software, the staff doubled the predicted gas release from the upstream side of a pipe break to account for flow escaping from both sides of the break. This approach is conservative because in the event of an actual break, the downstream side of the pipe would release much less gas than the estimated release from the upstream side." However, based on many past pipeline rupture investigations I have been involved in, a true transient graph of rupture mass release versus time on this system at the specific location near the Indian Point nuclear plant will easily demonstrate that mass rate of release will be much higher than "double" as assumed by the NRC. While it is true that the downstream side of the rupture pipe will eventually release gas at lower rates than the upstream side, the gas release rates will still be considerable, especially in the early stages of the rupture release. A transient analysis will further demonstrate this point and also prove the NRC analysis is not conservative on this remotely monitored system at this highly sensitive site.

14. NRC further asserted: "For the evaluation of the explosion hazard, the NRC used the peak gas release rate resulting from a pipe rupture to estimate the mass of natural gas. This approach predicts more gas released than other approaches such as a time dependent gas release or a release averaged over time." NRC's analysis ignores the reality that transient release rates for a 42-inch pipeline rupture so close to a compressor station will significantly increase "peak rupture rates" well above those of pipeline design capacity, compressor design capacity, and well above "double," as pipe system pressure curves are significantly reduced, compressors run out on their curves, and initial pipeline pressure at time of rupture on both the upstream and downstream ends of the rupture release at the sonic speed in the gas which is higher than the speed of sound. My experience indicates pipeline rupture gas rates of release will be incredibly high, well above the NRC's inferred "double," for quite some time.

15. Furthermore, NRC dismissed the safety risk of the close proximity of the AIM pipeline to IPEC as a very low probability based on unrealistic and unsupported assumptions that released gas from a pipeline only becomes ignited 5% of the time, and that only 1% of pipeline accidents result in a complete pipe break. NRC's analysis ignores the very real possibility that a 42-inch pipeline rupture will occur, and fails to consider the extreme forces associated with such a high pressure large diameter gas transmission pipeline

rupture that always, because of pipe rupture mechanics, releases as dual full bore pipeline releases.

16. Entergy's analysis that was approved by the NRC identified that in the vicinity of IPEC the 42-inch pipeline will be enhanced, or upgraded, to consist of X-70 API 5L grade pipe with a thicker wall thickness of 0.72 inches, buried to a minimum depth of four feet. While I approve of these specific proposed safety enhancement measures to increase the safety of a 42-inch pipeline near IPEC, additional arguments presented in the Analysis are very misleading or inappropriate so as to cause one to underrepresent the real risks of pipeline rupture on/near IPEC, even with the enhancements. These additional arguments are far from complete in preventing a pipeline rupture. For example, the argument to install a concrete barrier over the pipeline to prevent possible damage from third parties at first blush sounds like an appropriate step. Unfortunately, I have seen too many pipeline near misses where such barriers were defeated, negating the effectiveness of such barriers to avoid serious damage to high-pressure pipelines that could result in pipeline rupture.

17. I have yet to see a steel pipeline that cannot be damaged by third party threat activities, especially damage that could result in delayed pipeline rupture. I have seen similar misguided arguments presented in the Analysis that steel pipelines can be made difficult to puncture, reflected in some very poor pipeline risk management approach studies and safety risk analyses trying to improperly convey the impression that pipelines cannot be made to rupture. Delayed pipeline ruptures generating massive explosions and flames are caused by damage that seldom punctures the pipe, but the pipe is weakened to where it eventually fails in time as a rupture, a large pipeline fracture that occurs in microseconds during operation resulting in full bore pipeline releases.

18. An independent risk analysis is needed to more thoroughly assess the impact of a pipeline rupture on IPEC facilities and operation. Such a safety hazard analysis is unique to the IPEC facilities and should thoroughly evaluate and document a process safety management approach to assess the real effect on IPEC of the proposed 42-inch, 850 MAOP, gas transmission pipeline if it should rupture. Given the seriousness of a nuclear plant loss-of-containment incident, that analysis should reflect actual gas rupture dynamics and realistic heat flux release duration and impact for this specific location and system. Such an analysis should be performed and subjected to a true independent process hazard analysis that would assure any equipment loss impacted by such a large diameter pipeline rupture would not prevent the "failsafe" shutdown of IPEC, nor loss of radiation storage containment that could cascade into a radiation release in this highly populated and sensitive location.

19. The stark reality is that pipeline safety regulations and industry standards do not provide FERC with siting precautions for such sensitive locations. Integrity management ("IM") pipeline safety regulations have attempted to instill certain additional safety precautions in such potential High Consequence Areas, or HCAs. Unfortunately, the first phase of these IM regulations, in effect for more than ten years now, have met with very mixed success as evidenced by many high profile pipeline ruptures indicating further

improvements in IM regulation are warranted.

20. To further emphasize the risks associated with new pipelines as well as undermine the myth that new pipelines are immune to pipeline rupture, PHMSA, following various recent new pipeline construction project investigations, held a series of public meetings where PHMSA observed serious deficiencies/problems during the construction phase of new pipelines. Many of these concerns are associated with issues that introduced pipeline threats that could result in future pipeline rupture. The newness of a pipeline does not guarantee that such pipelines are immune from future pipeline rupture from threats introduced from poor construction and/or inspection practices.[3]

21. In addition, in 2015 the National Transportation Safety Board (NTSB), in evaluating the effectiveness of the first generation gas transmission pipeline safety integrity management approach, found many areas needing improvement to prevent gas transmission pipeline ruptures.[4] Specifically during the period in which the databases were comparable, "The NTSB concludes that from 2010-2013, gas transmission pipeline incidents were overrepresented on HCA pipelines compared to non HCA pipelines."[5] Effective regulation of HCAs should have resulted in a downward trend not an over representation. NTSB's observation comes as no surprise to me given my many investigations associated with pipeline rupture, which have uncovered numerous pipeline operator failures to comply with the intent of the integrity management federal minimum pipeline safety regulations.

22. My extensive experience in pipeline rupture investigations, spanning many decades, indicates that Entergy, the NRC, and others making statements that a 42-inch pipeline rupture can be quickly isolated and implying that the pipeline operator can quickly remotely recognize and isolate the pipeline rupture within minutes (such as shutdown in three minutes) are misleading and downright false. A transient pipeline rupture analysis for the proposed 42-inch, 850 psig MAOP pipeline in the vicinity of IPEC needs to be properly performed, subject to independent verification of key assumptions, and gas pipeline rupture possible impacts to IPEC reviewed to confirm that such a rupture event near IPEC and its associated key facilities would not prevent the facilities from safely shutting down and/or place the public at great risks.

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[3] See PHMSA website http://primis.phmsa.dot.gov/meetings/FilGet.mtg?fil=151 summarizing issues identified during PHMSA inspection of 35 construction projects.

[4] This 2015 NTSB report was referenced in PHMSA's recent Notice of Proposed Rulemaking Pipeline Safety: Safety of Gas Transmission and Gathering Pipelines, 81 FR 20722, 20729 ("The NTSB noted, in a 2015 study, that IM requirements have reduced the rate of failures due to deterioration of pipe welds, corrosion, and material failures. However, pipeline incidents in high-consequence areas due to other factors increased between 2010 and 2013, and the overall occurrence of gas transmission pipeline incidents in high-consequence areas has remained stable.").

[5] See attached NTSB, "Safety Study: Integrity Management of Gas Transmission Pipelines in High Consequence Areas," *NTSB SS-15/01*, January 27, 2015, p. 21.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 12, 2016.

Richard Kuprewicz

1. R. Kuprewicz CV
2. Town of Cortlandt Report (prepared by Accufacts), submitted to FERC (November 21, 2014), R. 1633
3. Accufacts Comments (October 12, 2015) re: NRC Response Letter dated September 25, 2015 re: Indian Point Nuclear Facility.
4. Extract from Safety Study: Integrity Management of Gas Transmission Pipelines in High Consequence Areas, NTSB SS 15-01, Section 3.2, p. 20-21 (January 27, 2015). Full report available at http://www.ntsb.gov/safety/safety-studies/Documents/SS1501.pdf.

R. Kuprewicz CV

Curriculum Vitae.

Richard B. Kuprewicz

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Profile:

As president of Accufacts Inc., I specialize in gas and liquid pipeline investigation, auditing, risk management, siting, construction, design, operation, maintenance, training, SCADA, leak detection, management review, emergency response, and regulatory development and compliance. I have consulted for various local, state and federal agencies, NGOs, the public, and pipeline industry members on pipeline regulation, operation and design, with particular emphasis on operation in unusually sensitive areas of high population density or environmental sensitivity.

Employment:

Accufacts Inc. **1999 – Present**

Pipeline regulatory advisor, incident investigator, and expert witness on all matters related to gas and liquid pipeline siting, design, operation, maintenance, risk analysis, and management.

Position: President
Duties: > Full business responsibility
> Technical Expert

Alaska Anvil Inc. **1993 – 1999**

Engineering, procurement, and construction (EPC) oversight for various clients on oil production facilities, refining, and transportation pipeline design/operations in Alaska.

Position: Process Team Leader
Duties: > Led process engineers group
> Review process designs
> Perform hazard analysis
> HAZOP Team leader
> Assure regulatory compliance in pipeline and process safety management

ARCO Transportation Alaska, Inc. **1991 - 1993**

Oversight of Trans Alaska Pipeline System (TAPS) and other Alaska pipeline assets for Arco after the Exxon Valdez event.

Position: Senior Technical Advisor
Duties: > Access to all Alaska operations with partial Arco ownership
> Review, analysis of major Alaska pipeline projects

ARCO Transportation Co. **1989 – 1991**

Responsible for strategic planning, design, government interface, and construction of new gas pipeline projects, as well as gas pipeline acquisition/conversions.

Position: Manager Gas Pipeline Projects
Duties: > Project management
> Oil pipeline conversion to gas transmission
> New distribution pipeline installation
> Full turnkey responsibility for new gas transmission pipeline, including FERC filing

Four Corners Pipeline Co. **1985 – 1989**

Managed operations of crude oil and product pipelines/terminals/berths/tank farms operating in western U.S., including regulatory compliance, emergency and spill response, and telecommunications and SCADA organizations supporting operations.

Position: Vice President and Manager of Operations
Duties: > Full operational responsibility
> Major ship berth operations
> New acquisitions
> Several thousand miles of common carrier and private pipelines

Arco Product CQC Kiln **1985**

Operations manager of new plant acquisition, including major cogeneration power generation, with full profit center responsibility.

Position: Plant Manager
Duties: > Team building of new facility that had been failing
> Plant design modifications and troubleshooting
> Setting expense and capital budgets, including key gas supply negotiations
> Modification of steam plant, power generation, and environmental controls

Arco Products Co. **1981 - 1985**

Operated Refined Product Blending, Storage and Handling Tank Farms, as well as Utility and Waste Water Treatment Operations for the third largest refinery on the west coast.

Position: Operations Manager of Process Services
Duties: > Modernize refinery utilities and storage/blending operations
> Develop hydrocarbon product blends, including RFGs
> Modification of steam plants, power generation, and environmental controls
> Coordinate new major cogeneration installation, 400 MW plus

Arco Products Co. **1977 - 1981**

Coordinated short and long-range operational and capital planning, and major expansion for two west coast refineries.

Position: Manager of Refinery Planning and Evaluation
Duties: > Establish monthly refinery volumetric plans
> Develop 5-year refinery long range plans
> Perform economic analysis for refinery enhancements
> Issue authorization for capital/expense major expenditures

Arco Products Co. **1973 - 1977**

Operating Supervisor and Process Engineer for various major refinery complexes.

Position: Operations Supervisor/Process Engineer
Duties: > FCC Complex Supervisor
> Hydrocracker Complex Supervisor
> Process engineer throughout major integrated refinery improving process yield and energy efficiency

Qualifications:

Currently serving as a member representing the public on the federal Technical Hazardous Liquid Pipeline Safety Standards Committee (THLPSSC), a technical committee established by Congress to advise PHMSA on pipeline safety regulations.
Committee members are appointed by the Secretary of Transportation.

Served seven years, including position as its chairman, on the Washington State Citizens Committee on Pipeline Safety (CCOPS).
Positions are appointed by the governor of the state to advise federal, state, and local governments on regulatory matters related to pipeline safety, routing, construction, operation and maintenance.

Served on Executive subcommittee advising Congress and PHMSA on a report that culminated in new federal rules concerning Distribution Integrity Management Program (DIMP) gas distribution pipeline safety regulations.

As a representative of the public, advised the Office of Pipeline Safety on proposed new liquid and gas transmission pipeline integrity management rulemaking following the pipeline tragedies in Bellingham, Washington (1999) and Carlsbad, New Mexico (2000).

Member of Control Room Management committee assisting PHMSA on development of pipeline safety Control Room Management (CRM) regulations.

Certified and experienced HAZOP Team Leader associated with process safety management and application.

Education:

MBA (1976)	Pepperdine University, Los Angeles, CA
BS Chemical Engineering (1973)	University of California, Davis, CA
BS Chemistry (1973)	University of California, Davis, CA

Publications in the Public Domain:

1. "An Assessment of First Responder Readiness for Pipeline Emergencies in the State of Washington," prepared for the Office of the State Fire Marshall, by Hanson Engineers Inc., Elway Research Inc., and Accufacts Inc., and dated June 26, 2001.

2. "Preventing Pipeline Failures," prepared for the State of Washington Joint Legislative Audit and Review Committee ("JLARC"), by Richard B. Kuprewicz, President of Accufacts Inc., dated December 30, 2002.

3. "Pipelines - National Security and the Public's Right-to-Know," prepared for the Washington City and County Pipeline Safety Consortium, by Richard B. Kuprewicz, dated May 14, 2003.

4. "Preventing Pipeline Releases," prepared for the Washington City and County Pipeline Safety Consortium, by Richard B. Kuprewicz, dated July 22, 2003.

5. "Pipeline Integrity and Direct Assessment, A Layman's Perspective," prepared for the Pipeline Safety Trust by Richard B. Kuprewicz, dated November 18, 2004.

6. "Public Safety and FERC's LNG Spin, What Citizens Aren't Being Told," jointly authored by Richard B. Kuprewicz, President of Accufacts Inc., Clifford A. Goudey, Outreach Coordinator MIT Sea Grant College Program, and Carl M. Weimer, Executive Director Pipeline Safety Trust, dated May 14, 2005.

7. "A Simple Perspective on Excess Flow Valve Effectiveness in Gas Distribution System Service Lines," prepared for the Pipeline Safety Trust by Richard B. Kuprewicz, dated July 18, 2005.

8. "Observations on the Application of Smart Pigging on Transmission Pipelines," prepared for the Pipeline Safety Trust by Richard B. Kuprewicz, dated September 5, 2005.

9. "The Proposed Corrib Onshore System - An Independent Analysis," prepared for the Centre for Public Inquiry by Richard B. Kuprewicz, dated October 24, 2005.

10. "Observations on Sakhalin II Transmission Pipelines," prepared for The Wild Salmon Center by Richard B. Kuprewicz, dated February 24, 2006.

11. "Increasing MAOP on U.S. Gas Transmission Pipelines," prepared for the Pipeline Safety Trust by Richard B. Kuprewicz, dated March 31, 2006. This paper was also published in the June 26 and July 1, 2006 issues of the Oil & Gas Journal and in the December 2006 issue of the UK Global Pipeline Monthly magazines.

12. "An Independent Analysis of the Proposed Brunswick Pipeline Routes in Saint John, New Brunswick," prepared for the Friends of Rockwood Park, by Richard B. Kuprewicz, dated September 16, 2006.

13. "Commentary on the Risk Analysis for the Proposed Emera Brunswick Pipeline Through Saint John, NB," by Richard B. Kuprewicz, dated October 18, 2006.

14. "General Observations On the Myth of a Best International Pipeline Standard," prepared for the Pipeline Safety Trust by Richard B. Kuprewicz, dated March 31, 2007.

15. "Observations on Practical Leak Detection for Transmission Pipelines – An Experienced Perspective," prepared for the Pipeline Safety Trust by Richard B. Kuprewicz, dated August 30, 2007.

16. "Recommended Leak Detection Methods for the Keystone Pipeline in the Vicinity of the Fordville Aquifer," prepared for TransCanada Keystone L.P. by Richard B. Kuprewicz, President of Accufacts Inc., dated September 26, 2007.

17. "Increasing MOP on the Proposed Keystone XL 36-Inch Liquid Transmission Pipeline," prepared for the Pipeline Safety Trust by Richard B. Kuprewicz, dated February 6, 2009.

18. "Observations on Unified Command Drift River Fact Sheet No 1: Water Usage Options for the current Mt.

Redoubt Volcano threat to the Drift River Oil Terminal," prepared for Cook Inletkeeper by Richard B. Kuprewicz, dated April 3, 2009.

19. "Observations on the Keystone XL Oil Pipeline DEIS," prepared for Plains Justice by Richard B. Kuprewicz, dated April 10, 2010.

20. "PADD III & PADD II Refinery Options for Canadian Bitumen Oil and the Keystone XL Pipeline," prepared for the Natural Resources Defense Council (NRDC), by Richard B. Kuprewicz, dated June 29, 2010.

21. "The State of Natural Gas Pipelines in Fort Worth," prepared for the Fort Worth League of Neighborhoods by Richard B. Kuprewicz, President of Accufacts Inc., and Carl M. Weimer, Executive Director Pipeline Safety Trust, dated October, 2010.

22. "Accufacts' Independent Observations on the Chevron No. 2 Crude Oil Pipeline," prepared for the City of Salt Lake, Utah, by Richard B. Kuprewicz, dated January 30, 2011.

23. "Accufacts' Independent Analysis of New Proposed School Sites and Risks Associated with a Nearby HVL Pipeline," prepared for the Sylvania, Ohio School District, by Richard B. Kuprewicz, dated February 9, 2011.

24. "Accufacts' Report Concerning Issues Related to the 36-inch Natural Gas Pipeline and the Application of Appleview, LLC Premises: 7009 and 7010 River Road, North Bergen, NJ," prepared for the Galaxy Towers Condominium Association Inc., by Richard B. Kuprewicz, dated February 28, 2011.

25. "Prepared Testimony of Richard B. Kuprewicz Evaluating PG&E's Pipeline Safety Enhancement Plan," submitted on behalf of The Utility Reform Network (TURN), by Richard B. Kuprewicz, Accufacts Inc., dated January 31, 2012.

26. "Evaluation of the Valve Automation Component of PG&E's Safety Enhancement Plan," extracted from full testimony submitted on behalf of The Utility Reform Network (TURN), by Richard B. Kuprewicz, Accufacts Inc., dated January 31, 2012, Extracted Report issued February 20, 2012.

27. "Accufacts' Perspective on Enbridge Filing to NEB for Modifications on Line 9 Reversal Phase I Project," prepared for Equiterre Canada, by Richard B. Kuprewicz, Accufacts Inc., dated April 23, 2012.

28. "Accufacts' Evaluation of Tennessee Gas Pipeline 300 Line Expansion Projects in PA & NJ," prepared for the Delaware RiverKeeper Network, by Richard B. Kuprewicz, Accufacts Inc., dated June 27, 2012.

29. "Impact of an ONEOK NGL Pipeline Release in At-Risk Landslide and/or Sinkhole Karst Areas of Crook County, Wyoming," prepared for landowners, by Richard B. Kuprewicz, Accufacts Inc., and submitted to Crook County Commissioners, dated July 16, 2012.

30. "Impact of Processing Dilbit on the Proposed NPDES Permit for the BP Cherry Point Washington Refinery," prepared for the Puget Soundkeeper Alliance, by Richard B. Kuprewicz, Accufacts Inc., dated July 31, 2012.

31. "Analysis of SWG's Proposed Accelerated EVPP and P70VSP Replacement Plans, Public Utilities Commission of Nevada Docket Nos. 12-02019 and 12-04005," prepared for the State of Nevada Bureau of Consumer Protection, by Richard B. Kuprewicz, Accufacts Inc., dated August 17, 2012.

32. "Accufacts Inc. Most Probable Cause Findings of Three Oil Spills in Nigeria," prepared for Bohler Advocaten, by Richard B. Kuprewicz, Accufacts Inc., dated September 3, 2012.

33. "Observations on Proposed 12-inch NGL ONEOK Pipeline Route in Crook County Sensitive or Unstable Land Areas," prepared by Richard B. Kuprewicz, Accufacts Inc., dated September 13, 2012.

34. "Findings from Analysis of CEII Confidential Data Supplied to Accufacts Concerning the Millennium Pipeline Company L.L.C. Minisink Compressor Project Application to FERC, Docket No. CP11-515-000," prepared by Richard B. Kuprewicz, Accufacts Inc., for Minisink Residents for Environmental Preservation and Safety (MREPS), dated November 25, 2012.

35. "Supplemental Observations from Analysis of CEII Confidential Data Supplied to Accufacts Concerning Tennessee Gas Pipeline's Northeast Upgrade Project," prepared by Richard B. Kuprewicz, Accufacts Inc., for Delaware RiverKeeper Network, dated December 19, 2012.

36. "Report on Pipeline Safety for Enbridge's Line 9B Application to NEB," prepared by Richard B. Kuprewicz, Accufacts Inc., for Equiterre, dated August 5, 2013.

37. "Accufacts' Evaluation of Oil Spill Joint Investigation Visit Field Reporting Process for the Niger Delta Region of Nigeria," prepared by Richard B. Kuprewicz for Amnesty International, September 30, 2013.

38. "Accufacts' Expert Report on ExxonMobil Pipeline Company Silvertip Pipeline Rupture of July 1, 2011 into the Yellowstone River at the Laurel Crossing," prepared by Richard B. Kuprewicz, November 25, 2013.

39. "Accufacts Inc. Evaluation of Transco's 42-inch Skillman Loop submissions to FERC concerning the Princeton Ridge, NJ segment," prepared by Richard B. Kuprewicz for the Princeton Ridge Coalition, dated June 26, 2014, and submitted to FERC Docket No. CP13-551.

40. Accufacts report "DTI Myersville Compressor Station and Dominion Cove Point Project Interlinks," prepared by Richard B. Kuprewicz for Earthjustice, dated August 13, 2014, and submitted to FERC Docket No. CP13-113-000.

41. "Accufacts Inc. Report on EA Concerning the Princeton Ridge, NJ Segment of Transco's Leidy Southeast Expansion Project," prepared by Richard B. Kuprewicz for the Princeton Ridge Coalition, dated September 3, 2014, and submitted to FERC Docket No. CP13-551.

42. Accufacts' "Evaluation of Actual Velocity Critical Issues Related to Transco's Leidy Expansion Project," prepared by Richard B. Kuprewicz for Delaware Riverkeeper Network, dated September 8, 2014, and submitted to FERC Docket No. CP13-551.

43. "Accufacts' Report to Portland Water District on the Portland – Montreal Pipeline," with Appendix, prepared by Richard B. Kuprewicz for the Portland, ME Water District, dated July 28, 1014.

44. "Accufacts Inc. Report on EA Concerning the Princeton Ridge, NJ Segment of Transco's Leidy Southeast Expansion Project," prepared by Richard B. Kuprewicz and submitted to FERC Docket No. CP13-551.

45. Review of Algonquin Gas Transmission LLC's Algonquin Incremental Market ("AIM Project"), Impacting the Town of Cortlandt, NY, FERC Docket No. CP14-96-0000, Increasing System Capacity from 2.6 Billion Cubic Feet (Bcf/d) to 2.93 Bcf/d," prepared by Richard B. Kuprewicz, and dated Nov, 3, 2014.

46. Accufacts' Key Observations dated January 6, 2015 on Spectra's Recent Responses to FERC Staff's Data Request on the Algonquin Gas Transmission Proposal (aka "AIM Project"), FERC Docket No. CP 14-96-000) related to Accufacts' Nov. 3, 2014 Report and prepared by Richard B. Kuprewicz.

47. Accufacts' Report on Mariner East Project Affecting West Goshen Township, dated March 6, 2015, to Township Manager of West Goshen Township, PA, and prepared by Richard B. Kuprewicz.

48. Accufacts' Report on Atmos Energy Corporation ("Atmos") filing on the Proposed System Integrity Projects ("SIP") to the Mississippi Public Service Commission ("MPSC") under Docket No. 15-UN-049 ("Docket"), prepared by Richard B. Kuprewicz,

dated June 12, 2015.

49. Accufacts' Report to the Shwx'owhamel First Nations and the Peters Band ("First Nations") on the Trans Mountain Expansion Project ("TMEP") filing to the Canadian NEB, prepared by Richard B. Kuprewicz, dated April 24, 2015.

50. Accufacts Report Concerning Review of Siting of Transco New Compressor and Metering Station, and Possible New Jersey Intrastate Transmission Pipeline Within the Township of Chesterfield, NJ ("Township"), to the Township of Chesterfield, NJ, dated February 18, 2016.

51. Accufacts Report, "Accufacts Expert Analysis of Humberplex Developments Inc. v. TransCanada Pipelines Limited and Enbridge Gas Distribution Inc.; Application under Section 112 of the National Energy Board Act, R.S.C. 1985, c. N-7," dated April 26, 2016, filed with the Canadian Nation Energy Board (NEB).

52. Accufacts Report, " A Review, Analysis and Comments on Engineering Critical Assessments as proposed in PHMSA's Proposed Rule on Safety of Gas Transmission and Gathering Pipelines," prepared for Pipeline Safety Trust by Richard B. Kuprewicz, dated May 16, 2016.

53. Accufacts' Report on Atmos Energy Corporation ("Atmos") filing to the Mississippi Public Utilities Staff, "Accufacts Review of Atmos Spending Proposal 2017 – 2021 (Docket N. 2015-UN-049)," prepared by Richard B. Kuprewicz, dated August 15, 2016.

Town of Cortlandt Report (prepared by Accufacts), submitted to FERC (November 21, 2014), R. 1633

SIVE PAGET & RIESEL P.C.

Daniel Mach
Direct Dial: (646) 378-7291
dmach@sprlaw.com

November 21, 2014

VIA eFiling

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: FERC Proceeding CP14-96: Algonquin Gas Transmission, LLC Algonquin Incremental Market ("AIM") Project

Dear Ms. Bose:

Enclosed for filing please find the report of Accufacts, Inc. prepared on behalf of the Town of Cortlandt, commenting on the Draft Environmental Impact Statement for the AIM Project. Exhibits 4 and 5 of the report refer to Critical Energy Infrastructure Information ("CEII") materials. Consistent with FERC's eFiling guidelines, we are filing both a public copy of the report from which Exhibits 4 and 5 have been redacted and, under seal, a full copy including Exhibits 4 and 5.

Please contact me if you require any additional information.

Sincerely,

Daniel Mach

Cc: Anita Rutkowski Wilson
Vinson & Elkins LLP
Attorneys at Law
2200 Pennsylvania Avenue NW, Suite 500 West
Washington, DC 20037-1701

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"Clear Knowledge in the Over Information Age"

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November 3, 2014

To: Mr. Thomas Wood
Town Attorney
Town of Cortlandt
1 Heady Street
Cortlandt Manor, NY 10567

Re: Review of Algonquin Gas Transmission LLC's Algonquin Incremental Market ("AIM Project"), Impacting the Town of Cortlandt, NY, FERC Docket No. CP14-96-0000, Increasing System Capacity from 2.6 Billion Cubic Feet (Bcf/d) to 2.93 Bcf/d

Executive Summary

Accufacts Inc. was retained by the Town of Cortlandt ("Cortlandt") to perform a basic system review and to provide a brief analysis of the above FERC filing as it may affect Cortlandt. The project as submitted to FERC is asking for several major modifications on the Algonquin gas transmission system to increase gas capacity by approximately 342 dekatherms per day (Dth/d) from Ramapo, NY, to move gas eastward to Connecticut, Rhode Island and Massachusetts markets. The AIM proposal impacting Cortlandt upgrades the existing 26-inch and 30-inch looped pipelines between the Stony Point and the Southeast Compressor Stations in New York, by removing sections of existing 26-inch lower 674 psig Maximum Allowable Operating Pressure ("MAOP") pipe, replacing it with approximately 8 miles of new 42-inch higher 850 psig MAOP pipe, and installing new interconnecting pressure reducing/letdown valves to take advantage of the higher MAOP pipe (See Exhibit 1).[1, 2, 3] A segment of the new 42-inch installation may also involve approximately 2 miles of pipe looped on new right-of-way ("ROW") running south of the Indian Point nuclear power plant complex within Cordlandt. Modifications to a metering and regulating station servicing the Cortlandt, NY area are also

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[1] Looping is the connection of two or more pipes between two points, splitting gas flow to reduce pressure drop through the connected sections of the pipeline due to pressure limitations or for increasing the flow rate in a bottlenecked or constrained segment or section.

[2] MAOP is a term defined in federal minimum pipeline safety regulations that defines the maximum pressure under which a gas pipeline may <u>normally</u> be operated. Pressures greater than MAOP are allowed in certain situations.

[3] There are varying numbers in AIM Project filings to FERC for the miles of pipe replacement within Cortlandt. The 8 mile figure is derived from Exhibit G data.

included in the project. This report focuses on the gas transmission infrastructure that could impact Cortlandt.

The following are major findings and observations from my analysis of the AIM Project proposal, sections of the AIM DEIS, and a detailed review of CEII information supplied in the Exhibit Gs submitted to FERC by Algonquin that contain important system information.[4] Exhibits 4 and 5, which are included as attachments, contain more detailed information bolstering my general observations and findings, but these two specific Exhibits are CEII protected under a nondisclosure agreement ("NDA"), and are not for public release or distribution, even among Cortlandt officials, unless they have also signed a FERC CEII NDA.

Major Accufacts Findings and Observations for Cortlandt concerning the AIM Project:

1) The new 42-inch pipeline in Cortlandt is considerably oversized/overbuilt for the stated capacity increase of 342 Dth/d claimed for this project.

2) Actual gas velocities, an important variable driving design, for the pre-AIM existing gas transmission pipelines spanning Cortlandt are within acceptable ranges, but after the AIM installation are so low that considerable future possible throughput increases can be easily accommodated for these segments.

3) Further Algonquin Pipeline pipe expansions in New York State are likely given the 42-inch pipe installations proposed for AIM, and the extremely high gas velocities in other existing segments of the New York system further downstream of Cortlandt. However, the AIM proposal and the DEIS contain no evaluation of the impacts of these future expansions.

4) The Safety Evaluation and Analysis for the Indian Point Nuclear Plant ("IPEC") submitted by Entergy concerning the risk associated with the 42-inch AIM pipeline is seriously deficient and inadequate.

5) Additional precautions are warranted for the proposed southern 42-inch pipeline route near the Buchanan-Verplanck Elementary school.

Expanding on the above major findings and observations:

1) The new 42-inch pipeline in Cortlandt is considerably oversized/overbuilt for the stated capacity increase of 342 Dth/d claimed for this project.

The following Exhibits included as Attachments supplement this report:

1) Exhibit 1 is a simple schematic developed from information in the public domain of the existing and proposed major pipeline segments for the AIM Project that could impact

[4] Accufacts requested the CEII information from FERC on September 11, 2014 and received the files from Algonquin on October 6, 2014.

Cortlandt. The AIM Project is proposing to modify the pipeline segments between the Stony Point and Southeast Compressor Stations into two significantly different operating loops via new mainline interconnects utilizing pressure reducing/letdown valving installations, and various pig launcher/receiver modifications (to be installed within Cortlandt) to produce: (a) a "Smaller Loop" mainline system consisting of first an existing 30-inch pipeline reducing to an already existing 26-inch mainline, and (b) a "Larger Loop" mainline system consisting of new proposed 42-inch pipe reducing down to an already existing downstream 30-inch mainline (See Exhibit 1).[5]

2) Exhibit 2 is a figure captured from the AIM Project DEIS showing the relative location of where the existing 26-inch pipeline will be removed and replaced by new 42-inch pipeline that AIM has labeled "Take-up and Relay (T&R)," in essentially the same right-of-way ("ROW") through most of Cortlandt.[6]

3) Exhibit 3 is a figure taken from the AIM DEIS depicting existing and proposed Algonquin Hudson River crossings for the AIM Project.[7]

4) Exhibit 4 (CEII Protected) is a hydraulic profile (pipeline pressure vs. pipeline milepost) developed by Accufacts for the smaller diameter (30-inch and 26-inch) lower MAOP pipeline (Smaller Loop) segment within New York State, pre and post AIM Project, for the pipelines between the Stony Point and Southeast compressor stations, incorporating Exhibit G information provided by Algonquin's submission to FERC.

5) Exhibit 5 (CEII Protected) is a hydraulic profile developed by Accufacts for the larger diameter (42-inch and 30-inch) higher MAOP pipeline (Larger Loop) segment within New York State, pre- and post-AIM Project, for the pipelines between the Stony Point and Southeast compressor stations, incorporating the Exhibit G information provided by Algonquin's submission to FERC.

Exhibits 1, 2, and 3 provide a quick perspective of the pipeline changes and general routing for the AIM Project in that specific segment of concern between the compressor stations that bridge Cortlandt. Exhibits 4 and 5 provide a more detailed technical perspective of some of the hydraulics (pressures, MAOP, and gas velocities at certain locations along the pipelines) for the flow cases that drive various Accufacts conclusions and findings. For ease of reference in Exhibit 4 and 5, I have set the milepost ("MP") reference for the segments beginning at the Stony Point, NY compressor station at zero. The pipelines crossing Cortlandt generally begin at the landfall on the east side of the Hudson River, and are thus

[5] Pig launcher/receivers are above ground installations to permit the periodic launching or receiving, depending on their location within the system, of multi-ton inline inspection tools inserted into an operating transmission pipeline to assess for various pipeline imperfections, or certain possible threats, to pipeline integrity.

[6] Algonquin Gas Transmission LLC Docket No. CP14-96-000, FERC/EIS-0254D, "Algonquin Incremental Market Project Draft Environmental Impact Statement," filed to the FERC Docket on 8/6/14, p. 2-2.

[7] *Ibid.*, p. 3-20.

between approximately MP 3.5 and 11.5 as indicated on Exhibits 4 and 5. Exhibit 4 contains an approximately 5 mile shorter length for the Smaller Loop between compressor stations post versus pre AIM, which Accufacts cannot explain from the Exhibit G data provided. This discrepancy suggests an error in this important submission to FERC. This difference does not affect Accufacts' major findings or conclusions, however.

In addition, I have reviewed the Hudson River crossing DEIS discussions currently consisting of: two existing 24-inch pipelines, and an existing 30-inch pipeline, and a proposed new 42-inch pipeline crossing to be routed either south of the existing three gas pipeline river crossings or at a more northern crossing (the Hudson River Northern Route Alternative, or "HRNRA") near the existing three pipelines (See Exhibit 3).[8] This new 42-inch Hudson River crossing, to be installed via Horizontal Directional Drill, or HDD, if possible, would connect to new onshore 42-inch pipelines installed on each side of the Hudson River as part of AIM. The southern 42-inch crossing option would incorporate a new additional pipeline right-of-way of approximately 1 3/4 miles within Cortlandt as it is routed out of the existing pipeline ROW and south of the Indian Point Energy Complex passing a church and an elementary school. The route eventually rejoins the existing 26-inch ROW east of IPEC to continue its route through Cortlandt in the existing ROW as indicated in Exhibit 3 filed to the FERC Docket on August 6, 2014 as the Draft Environmental Impact Statement, or DEIS.

A detailed review of the CEII files captured by the hydraulic profile in Exhibit 5 clearly demonstrates the 42-inch pipeline is not needed for the AIM project claimed capacity increases of 342 Dth/d. The Larger Loop is taking considerable pressure drop introduced from a new "midstream" mainline pressure reducing/letdown valve located at the end of the new pipe MAOP 42-inch upgrade at the edge of Cortlandt, essentially wasting horsepower added at the Stony Point compressor station (See Exhibits 1 and 5). The 42-inch proposal overbuilds the system for the capacity/horsepower increases submitted for AIM. The Stony Point Compressor station after the AIM project, fails on both the Larger Loop and Smaller Loop mainline systems to operate anywhere near Stony Point Compressor Station discharge pipeline MAOP, and the 42-inch to 30-inch mainline pressure reducing/letdown valve takes a major pressure drop for the stated maximum flow conditions.[9] This indicates that added AIM horsepower is wasted at the Stony Point Compressor station increasing pollution emissions.

Exhibit 5 can also be used to demonstrate that a new smaller (i.e., 30 or 36-inch 850 psig MAOP pipe instead of the proposed 42-inch) can provide the additional 342 Dth/d claimed in the AIM proposal. Installation of higher rated MAOP pipe on the discharge segment of Stony Point Compressor Station deals with one bottleneck on this segment spanning the compressor stations. AIM is incomplete, however, as it fails to also adequately address the

[8] The proposed installation of the 42-inch across the Hudson River and south of Indian Point is in a new ROW within the Town of Cordlandt. The existing two, 24-inch and one, 30-inch crossings under the Hudson River will remain active and pressurized, in "standby" backup service if ever needed, which is a reasonable operating approach for this river crossing.

[9] For the Exhibit G CEII cases reviewed, the Smaller Loop does not take pressure drop at the new pressure reducing/letdown valve to stay within the 26-inch mainline MAOP.

weaker bottleneck mainline segments downstream of Cortlandt entering the Southeast Compressor Station that are experiencing extremely high actual gas velocities.

Installation of the overbuilt/oversized AIM 42-inch pipe appears to be an initial effort by Algonquin to minimize future construction impacts by installing a pipeline larger than that needed for the present stated application, but positions the system for future major increased expansions. This is especially true if further downstream pipeline "bottlenecks" to the Southeast Compressor Station can be overcome with additional pipe replacements/upgrades to reduce the extreme actual gas velocities in these remaining existing mainline pipes.

The AIM Project is clearly oversized and is only a partial step toward a more system-wide pipe upgrade path within the state of New York. The AIM Project thus appears to be either an unjustified pipeline expansion or a segmentation of a larger, system-wide upgrade. The AIM Project effort is substituting quicker-to-install compressor horsepower placed at Stony Point against additional needed pipe replacement. Such a quicker path may be an attempt to avoid a proper environmental review and introduces a substantial loss of pipeline system efficiency via wasted horsepower and subsequent increased air pollution emissions. This inefficiency is not addressed in AIM's DEIS.

2) Actual gas velocities, an important variable driving design, for the existing gas transmission pipelines <u>spanning Cortlandt</u> are within acceptable ranges, and after the AIM installation are so low that considerable future possible throughput increases can be easily accommodated for these segments.

For a natural gas transmission pipeline a critical variable, actual gas velocities (in ft/sec, or fps) along the system, is very relevant, usually driving piping mainline modification/addition decisions and compressor horsepower installations. Actual gas velocities within a pipeline segment are mainly a function of:

1. the internal pipeline diameter,
2. the required gas flow along a given pipeline segment, usually reported at standard flow conditions,
3. pipeline pressure, which decreases and varies down a pipeline, and
4. pipe segment MAOP.[10]

Because natural gas is compressible as pressure decreases along a pipeline, actual gas velocities increase for the same cross-sectional area of the pipe and same gas flow stated at standard conditions. Gas flow as stated at standard conditions of temperature and pressure can vary depending on possible major additions and takeoffs along a specific pipeline segment, though many segments do not have major receipts or deliveries. Because the pressure at the downstream segment is less than the upstream pressure, actual mainline velocity is usually (but not always, depending on such factors as receipts/deliveries) highest for pipeline segments immediately upstream of compressor stations (at lowest segment

[10] There is an associated effect of gas temperature on gas velocity but this influence in long transmission pipelines is usually not leveraging.

pressure). High gas velocities can also be experienced in segments where the effective cross sectional area of a pipeline, or looped pipelines, is restricted or "pinched," compared to the rest of the segments experiencing similar standard flows and pressures.

Accufacts has observed that maximum actual gas velocities along a specific pipeline have usually been set by company internal standards that keep velocities well below those that could result in mainline erosion and based on other considerations. As a result, federal minimum pipeline safety regulations have not established maximum gas velocities for gas transmission pipelines. Unfortunately, Accufacts has found that more than one company has elected to change, ignore, or modify their own internal maximum historical gas velocity standards in recent FERC filings in order to minimize project costs and/or accelerate applications/approvals with FERC and project startup on multibillion dollar expansion projects. For example, I place little credence in studies or industry standards submitted to FERC that try to convey that a maximum gas velocity of 100 fps is appropriate for gas transmission pipelines.[11] For many reasons, including close proximity to population areas, gas transmission velocities should be set at limits well below those of production pipelines.

For gas transmission pipelines, two cases are usually important in actual gas velocity determinations: the velocities at "design" capacity, and the velocities at "peak flow" which will usually be higher than the design case. These two terms are often not defined in a FERC process and their misuse or misapplication can have serious consequences on safe and appropriate operation of a gas transmission pipeline.

Peak flow cases and their probable duration usually establish the maximum actual gas velocity design control within a transmission pipeline segment, as well as the needed additional horsepower and pipeline operating pressure, but this should be confirmed by the development of a hydraulic profile (pipeline operating pressure vs milepost) of the boundary case incorporating the gas additions and removals along a pipeline system that may differ between the cases. Peak flow cases usually set the maximum operating pressure which can affect a safety design review within a pipeline segment, but not always. The information provided in Exhibit Gs usually permits one to develop such a simple hydraulic profile as that captured in Exhibits 4 and 5. Fortunately, the Exhibit Gs and supporting documents for the AIM Project provided under CEII Nondisclosure Agreements provided sufficient relevant details to reliably evaluate this system at important points where actual gas velocities may be critical for the AIM Project and provide an indication where pipeline bottlenecks remain for possible future capacity increases.

A detailed analysis of the information provided under FERC CEII nondisclosure and Algonquin NDA agreements has allowed Accufacts to develop the hydraulic profiles of Exhibits 4 and 5.[12] Further, Accufacts' calculations based on this CEII protected data

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[11] Accufacts Report to Delaware Riverkeeper, "Evaluation of Actual Velocity Critical Issues Related to Transco's Leidy Expansion Project," dated Sept 8, 2014 (FERC Docket No. CP13-551, Accession No. 20140910-5084 submitted 9/10/2014).

[12] Accufacts was required to take a highly unusual step of signing an Algonquin NDA, which raises serious questions about the CEII process in this FERC filing.

indicate that actual gas velocities do not exceed prudent velocities in the pipeline segments spanning Cortlandt for both the AIM base and expansion cases. In fact, the resulting very low gas velocities for these segments after AIM suggest the pipelines crossing Cortlandt will be able to easily accommodate considerable future expansions via horsepower increases at the Stony Point compressor station.

3) Further Algonquin Pipeline pipe expansions in New York State are likely given the 42-inch pipe installations proposed for AIM, and the extremely high gas velocities in other existing segments of the New York system further downstream of Cortlandt. However, the AIM proposal and the DEIS contain no evaluation of the impacts of these future expansions.

While the gas transmission pipelines crossing Cortlandt for the CEII cases reviewed indicate actual gas velocities well within acceptable ranges, this is not the case for much of the existing looped pipelines remaining downstream of Cortlandt but upstream of the Southeast Compressor Station in New York. Actual gas velocities on these existing 26 and 30-inch downstream transmission pipelines are at the highest levels that Accufacts has observed in the many FERC CEII filings we have been asked to review (well beyond 60 feet per second). Such high gas velocities suggest further pipe replacement projects in the Algonquin system in New York are needed or forthcoming. Such additional expansions should not be segmented in phases, but should be considered as one overall project requiring a complete environmental review considering their cumulative environmental impact. FERC needs to pursue this important possible segmentation question in further detail.

Because of gas compressibility, pipeline segments facing high gas velocities from increased demand can reduce velocities by increasing compressor horsepower with one or a combination of the following approaches: (1) increase system operating pressure subject to the MAOP limitations of the pipe, (2) rerate or uprate the segment of the pipe MAOP following certain pipeline safety minimum regulations for such upgrades that can introduce some serious risks unless a proper integrity hydrotest is performed, (3) replace or loop the pipeline usually with higher MAOP rated pipe, to yield a larger effective diameter for the segment, and/or (4) shorten the interval between compressor stations by adding new compressor stations that essentially raise the system average operating pressure.

While the 42-inch take and replace segments (42-inch to replace portions of the existing 26-inch) overcompensate for basically the upstream half of the looped system between Stony Point and Southeast Compressor Stations within New York, the remaining existing looped New York pipeline systems downstream of Cortlandt are a serious impediment given inefficiencies of the looped remaining pipeline system both in limited pipe diameter and low MAOP. I would anticipate further 26-inch pipe replacement proposals on this segment downstream of Cortlandt and upstream of the Southeast Compressor Station in the near future that take full advantage of additional capacity of the 42-inch proposed installation applied for in this Docket. Commensurate with such an additional pipe segment upgrading will most likely be a need for additional compressor horsepower at Stony Point.

4) The Entergy-submitted Safety Evaluation and Analysis for the Indian Point Nuclear Plant ("IPEC") concerning the risk associated with the 42-inch AIM pipeline is seriously deficient and inadequate.[13]

After a careful review, Accufacts has concluded that the above referenced Entergy Safety Evaluation and Analysis ("Analysis"), which includes enhanced pipeline measures proposed by the pipeline operator for the 42-inch pipe segment near IPEC fails to adequately capture the threat and, more importantly, prudently demonstrate that rupture of the new 42-inch higher MAOP pipeline will not markedly impact IPEC facilities, including IPEC's ability to "failsafe" shutdown from such a pipeline rupture. A 42-inch pipeline rupture is a far greater release event than that from the existing 26- or 30-inch lower MAOP gas transmission pipelines now operating in close proximity to IPEC.

A primary deficiency in the Analysis is the critical assumption of a three minute response time to identify, acknowledge, and close appropriate gas mainline remote isolation valves in event of a pipeline rupture. This assumption is unrealistically optimistic, ignoring both systemic dynamics (compressor and pipeline system rupture dynamics/interactions that mask remote rupture identification), uncertainty in the SCADA monitoring that will further delay remote recognition of a pipeline rupture, and control room operator confusion and related human factors that will also easily further delay control room remote response actions of a pipeline rupture, all of which will work to drive response well beyond the assumed 3 minute time. In addition, the 3 minute assumption disregards initial release and subsequent blowdown times dictated by the laws of thermodynamics related to pipeline rupture, even large 42-inch gas transmission pipelines. History is filled with clear examples of gas transmission pipeline rupture events generating high heat flux events well past an hour, so the 3-minute response assumption in the Analysis is highly unrealistic and not appropriate for this sensitive infrastructure site, especially with a 42-inch high MAOP pipeline. Such important issues must be taken into consideration in any prudent and realistic safety analysis concerning critical energy infrastructure, such as a nuclear power plant, where gas transmission pipeline rupture interactions, such as loss of nearby power grid or substations and resulting loss of power to IPEC, may cascade or snowball, driving the nearby IPEC facility to failure or prevent emergency access.

The Analysis has identified that in the vicinity of IPEC the 42-inch pipeline will be enhanced, or upgraded, to consist of X-70 API 5L grade pipe with a thicker wall thickness of 0.72 inches, buried to a minimum depth of four feet.[14] While I approve of these specific proposed safety enhancement measures to increase the 42-inch pipeline safety near IPEC, additional arguments presented in the Analysis are very misleading or inappropriate so as to cause one to underrepresent the real risks of pipeline rupture on/near IPEC, even with the enhancements. These additional arguments are far from complete in preventing a pipeline

[13] Entergy letter to U.S. Nuclear Regulatory Commission, "10 C.F.R 50.59 Safety Evaluation and Supporting Analysis Prepared in Response to the Algonquin Incremental Market Natural Gas Project Indian Point Nuclear Generating Unit Nos. 2 & # Docket Nos. 5-247 and 50-286 License Nos. DPR-26 and DPR-64," dated August 21, 2014.
[14] *Ibid.*, Sheets 3 to Sheet 10 of 21.

rupture. For example, the argument to install a concrete barrier over the pipeline to prevent possible damage from third parties at first blush sounds like an appropriate step. Unfortunately, Accufacts has seen too many pipeline near misses where such barriers were defeated, negating the effectiveness of such barriers to avoid serious damage to high-pressure pipelines. Accufacts has yet to see a steel pipeline that cannot be damaged by third party threat activities, especially damage that could result in delayed pipeline rupture. I have seen similar misguided arguments presented in the Analysis that steel pipelines can be made difficult to puncture, reflected in some very poor pipeline risk management approach studies and safety risk analyses trying to improperly convey the impression that pipelines cannot be made to rupture. Delayed pipeline ruptures generating massive explosions and flames are caused by damage that seldom punctures the pipe, but the pipe is weakened to where it eventually fails in time as a rupture, a large pipeline fracture that occurs in microseconds during operation.

The Analysis should more thoroughly assess the impact of pipeline rupture on IPEC facilities and operation. Such a safety hazard analysis is unique to the IPEC facilities and should thoroughly evaluate and document a process safety management approach to assess the real effect on IPEC of the proposed 42-inch, 850 MAOP, gas transmission if it should rupture. Given the seriousness of a nuclear plant loss-of-containment incident, that analysis should reflect actual gas rupture dynamics and realistic duration and impact for this specific location and system. Such an analysis should be performed and subjected to a true independent process hazard analysis that would assure any equipment loss impacted by such a large diameter pipeline rupture would <u>not</u> prevent the "failsafe" shutdown of IPEC, nor loss of radiation storage containment that could cascade into a radiation release in this highly populated and sensitive location. Risk management analysis should be considered seriously deficient if it dismisses low probability events with catastrophic consequences as no probability. History has repeatedly demonstrated that when it comes to complex systems, low probability events can easily become linked, substantially increasing the likelihood and risks, and may even drive a system to catastrophic failure with all too predictable disastrous consequences. A more thorough and truly independent safety analysis of the 42-inch pipeline and its possible rupture effects to IPEC are warranted and the results made public given the deficiencies and many failings of the current Analysis to instill confidence in the public.

5) Additional precautions are warranted for the proposed southern 42-inch pipeline route near the Buchanan-Verplanck Elementary school.

Given the various concerns raised from involved officials and citizens about the risks associated with the southern routing option of the new 42-inch proposed pipeline in close proximity to the Buchanan-Verplanck Elementary School, Accufacts will comment on pipeline related safety concerns concerning this matter. Ironically, current federal pipeline minimum safety regulations, industry codes, or best practices, do not specifically or adequately address siting issues or risks related to natural gas pipelines near schools. Pipeline safety regulations are moot concerning such important siting related issues for various reasons.

Nevertheless, there are several precautions that Accufacts recommends that would prove helpful to minimize the consequences of a 42-inch pipeline rupture if the new pipeline is routed in such a sensitive location near the school. There is no requirement that a pipeline be placed in an existing or new ROW, or even in the middle of a pipeline ROW. The placement of the pipeline right-of-way and the actual location of the pipeline within the ROW should be carefully reviewed and assured so as to minimize the removal of trees that buffer between the proposed pipeline and the school. Such large and numerous trees can reduce the impact of blast and thermal radiation to structures and individuals, buying critical time that can markedly reduce injury or loss of life associated with a possible pipeline rupture. In addition the Buchanan-Verplanck Elementary School is constructed mostly of masonry that has a much greater tolerance, or survivability, during a rupture event. Such more hardened structures also serve as excellent radiation shields to shelter individuals from blast and thermal radiation. While there is no requirement, placement of school ball and play fields where individuals are most likely to be caught unsheltered, are best situated as presently located, in the shadow of the building away from the gas transmission pipeline. Sheltering substantially increasing the likelihood of individual survival should a pipeline rupture.

The stark reality is that pipeline safety regulations and industry standards do not provide FERC with siting precautions for such sensitive locations. Integrity management ("IM") pipeline safety regulations have attempted to instill certain additional safety precautions in such potential High Consequence Areas, or HCAs. Unfortunately, the first phase of these IM regulations, in effect for more than ten years now, have met with very mixed success as evidenced by many high profile pipeline ruptures indicating further improvements in IM regulation are warranted.[15]

Conclusion

It should be clear, from a review of the Exhibits and the above discussions, that the attempt to replace segments of the 26-inch pipeline segment with a 42-inch pipeline across Cortlandt are not in sync with the claimed increased gas demands identified in the current AIM FERC filing and subsequent DEIS. The operator appears to be positioning for further expansions on the Algonquin system and there are still serious bottlenecks on the looped system between the Stony Point and Southeast Compressor Stations that should have been included with this FERC application. The operator appears to be attempting to utilize horsepower compressor additions that can be permitted more quickly than pipe installations, in an attempt to overcome pipeline bottleneck inefficiencies in remaining segments spanning New York State.

Accufacts cannot overstress the importance of performing a full and complete process hazard safety analysis, independently demonstrating, especially to the public, that there will be no interplay between a possible gas transmission pipeline rupture and the IPEC facilities to failsafe shutdown or cause a loss of radiation containment in such a sensitive and highly populated area

[15] Sites where significant numbers of people can gather near a pipeline, such as churches and schools, fall under the definition of High Consequence Areas, meriting additional pipeline safety integrity management precautions as per Subpart O of 49CFR§192 for gas transmission pipelines.

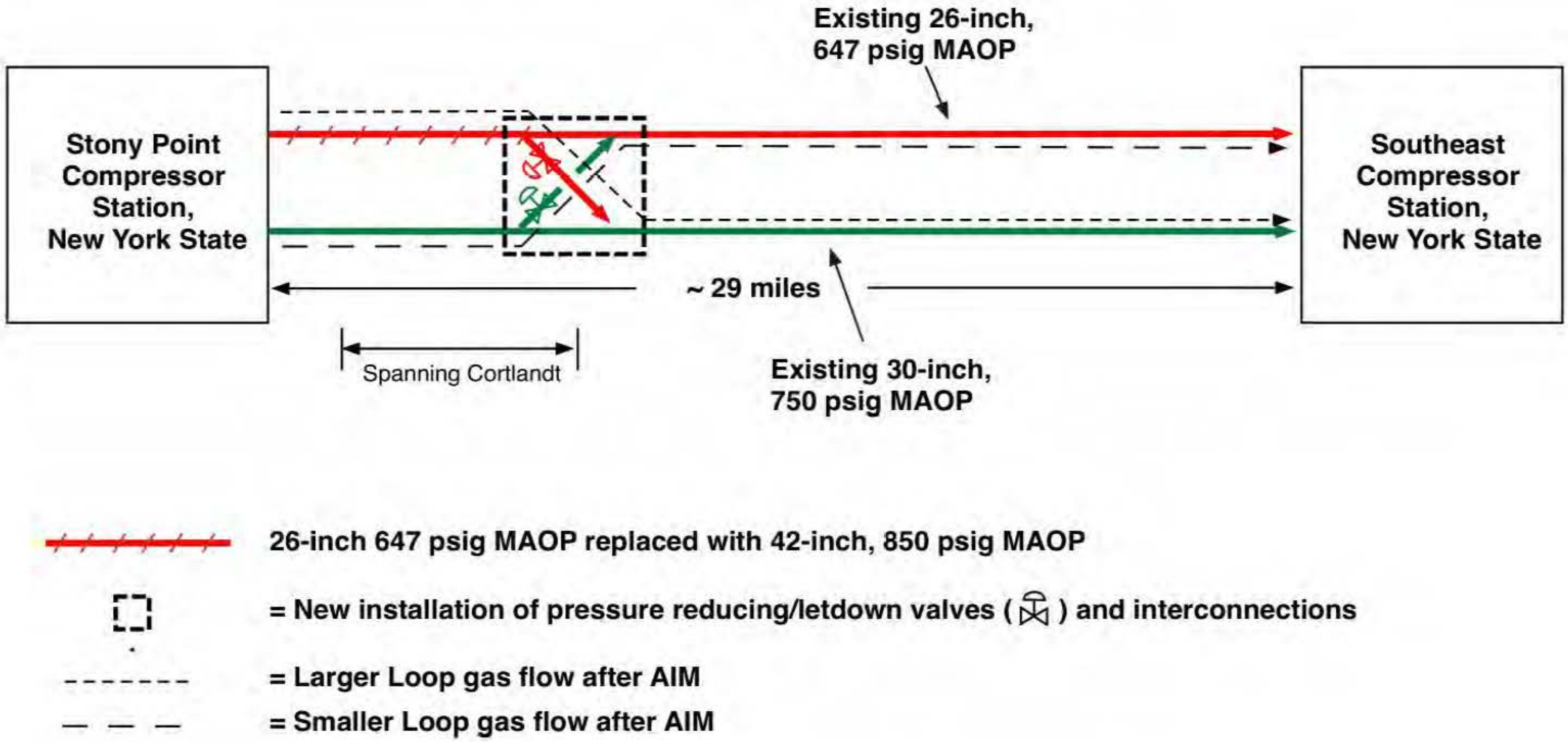
of the country. A proper and thorough hazard review and analysis may suggest another 42-inch route is warranted to assure the safety of IPEC from this gas transmission pipeline infrastructure. While Accufacts can appreciate attempts to keep certain information of such an important safety analysis somewhat secret, much more detailed effort is needed to assure the public that prudent and complete safety analysis efforts have been performed in choosing possible pipeline options in this location.

Richard B. Kuprewicz

Richard B. Kuprewicz
President,
Accufacts Inc

Exhibit 1

Simplified Schematic - Algonquin Gas Transmission Pipelines
Stony Pt to Southeast Compressor Stations Looped Segment
Pre & Post AIM Project Proposal



Accufacts Inc. 11/2/14 - Not to Scale

Exhibit 2 – AIM Project Overview Map from DEIS Showing General Location of Replacement of 26-inch with 42-Inch Pipeline Across Cortland, NY

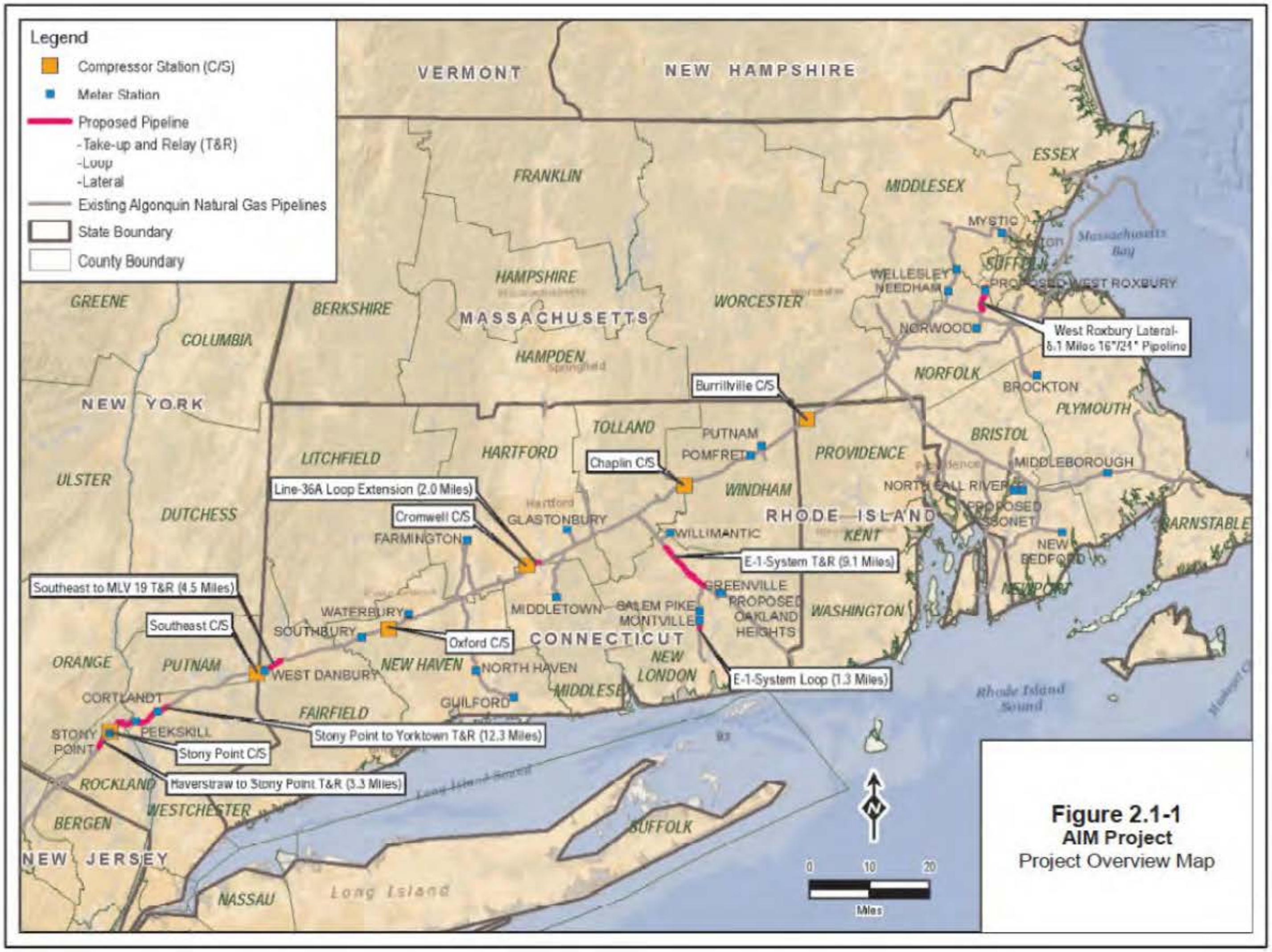
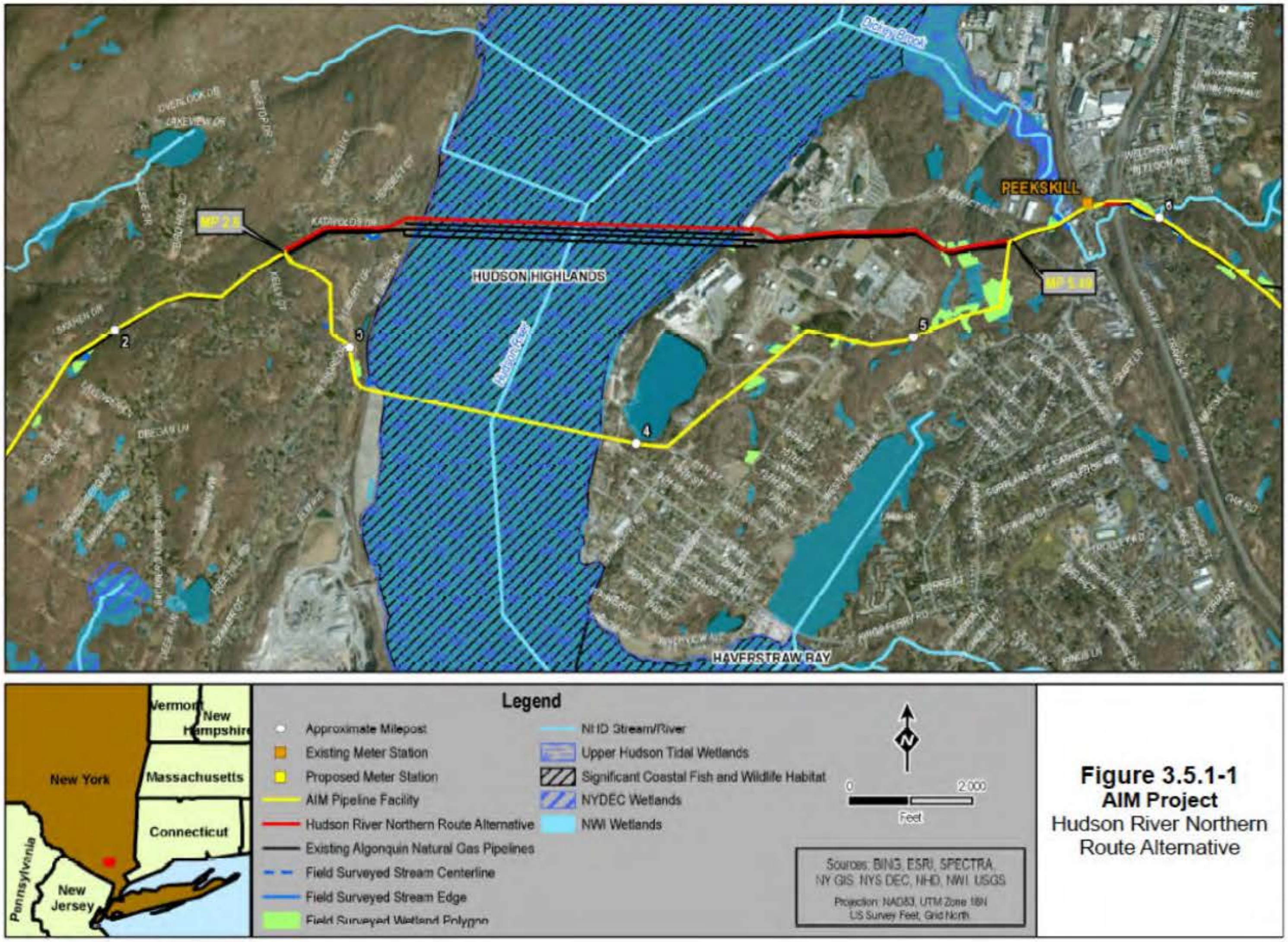


Figure 2.1-1
AIM Project
Project Overview Map

Exhibit 3 – Algonquin Pipeline Hudson River Crossings, Existing and Proposed from AIM DEIS



Document Content(s)

Accufacts Comments (October 12, 2015)
re: NRC Response Letter dated September 25, 2015
re: Indian Point Nuclear Facility.

Accufacts Inc.
"Clear Knowledge in the Over Information Age"

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October 12, 2015

To: The Honorable Sandy Galef
New York Assemblywoman
95th Assembly District
2 Church Street
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Re: Accufacts' Observations on NRC Response Letter Dated September 25, 2015 Concerning "Indian Point Nuclear Generating Unit Nos. 2 and 3 – Response to Letter Dated August 4, 2015."

I have reviewed the above NRC September 25, 2015 letter to you and continue to find the NRC demonstrating an inability to grasp simple but important scientific and engineering process safety concepts related to whether the Indian Point nuclear facility is at risk in the event of a rupture of the nearby proposed 42-inch high pressure gas transmission pipeline. The NRC's assumptions and comments instill no confidence that their analysis is either relevant or appropriate. Their approach and statements clearly demonstrate that the NRC does not grasp the tremendous energy releases and dynamics associated with pipeline rupture of this very large diameter pipeline, and therefore should not be using their current approaches to evaluate gas transmission pipeline rupture impacts on their facilities. Attempting to use inappropriate models that fail to capture the unique transient impacts of a high-pressure large diameter gas transmission pipeline rupture in a highly sensitive site is a poor and inappropriate approach that Accufacts has found in far too many incident investigations associated with misinformation. A true transient release dynamics graph (release rate versus time) of the proposed 42-inch pipeline rupture case near the Indian Point nuclear facility should clearly demonstrate the many flaws in the NRC's recent letter to you for this very uniquely sited pipeline.

While the case to be calculated should not be that difficult to set up, it requires that certain information declared "secret or confidential" be disclosed. The transient calculations for this gas transmission system pipeline rupture near the nuclear site can be quite involved, however, and are not well nor scientifically captured by models or unwise assumptions never intended for such purpose, such as the ALOHA model cited by the NRC. I would advise that you continue to pursue this effort until the NRC produces such a transient analysis that actually reflects a rupture impact of the high-pressure 42-inch gas transmission pipe near the nuclear facility. There should be mechanisms that would permit you, as an Assemblywoman, to gain access to declared sensitive information that would allow you to reach a prudent conclusion that an analysis is complete and prudent concerning their rupture approach, which appears is not the case for the NRC's position cited in their recent letter.

A closer review of the NRC letter's three major stated assumptions will also clearly demonstrate the NRC's approach **is not conservative** and is seriously flawed. For example:

NRC Assumption Statement

"Based on input from Spectra Energy, the initial analysis assumed a closure time of 3 minutes on pipeline isolation valves. In addition to the 3-minute valve closure case, the NRC evaluated a bounding case. This second case assumes the upstream side of the ruptured pipe is connected to an infinite source of gas for 1 hour."

Accufacts Observation

This NRC statement is meaningless and does not permit an independent evaluation that the parties performing such a potential impact analysis understand the extremely high transient rupture gas rates and very high heat fluxes that can be released on this pipeline system at this site. For example, a three minute closure time does not indicate how long the gas has been releasing (at incredibly high rates) out of a pipeline rupture on this specific system at this location before valve and, ironically, after valve closure. The NRC assumption also appears not to consider that gas release even with closed valves will continue at very high rates for a considerable period of time. A transient graph of mass release versus time will indicate a characteristic gas pipeline rupture fingerprint form that will dispel any attempts to quickly remotely identify, much less actually trigger, valve closure even for automatic valves. Such a graph will also reveal the case irrelevancy of a ruptured pipeline connected to an infinite source of gas for one hour in the matter of this safety analysis.

NRC Assumption Statement

"The NRC staff modeled a pipe break at the location closest to plant structures. Because of a limitation of the ALOHA software, the staff doubled the predicted gas release from the upstream side of a pipe break to account for flow escaping from both sides of the break. This approach is conservative because in the event of an actual break, the downstream side of the pipe would release much less gas than the estimated release from the upstream side."

Accufacts Observation

Based on many past pipeline rupture investigations, Accufacts believes a true transient graph of rupture mass release versus time on this system at the specific location near the Indian Point nuclear plant will easily demonstrate that mass rate of release will be much higher than "double" as assumed by the NRC. While it is true that the downstream side of the rupture pipe will eventually release gas at lower rates than the upstream side, the gas release rates will still be considerable, especially in the early stages of the rupture release. A transient analysis will further demonstrate this point and also prove the NRC analysis <u>is not conservative</u> on this remotely monitored system at this highly sensitive site.

NRC Assumption Statement

> "For the evaluation of the explosion hazard, the NRC used the peak gas release rate resulting from a pipe rupture to estimate the mass of natural gas. This approach predicts more gas released than other approaches such as a time dependent gas release or a release averaged over time."

Accufacts Observation

> Accufacts cannot reach any conclusions concerning "peak gas release rate resulting from a pipeline rupture," from the above NRC assumption statement, but given the less than accurate information released to date and our experience in rupture investigations, such a peak rate will most likely be well above that utilized in the NRC analysis. Transient release rates for a 42-inch pipeline rupture so close to a compressor station will significantly increase "peak rupture rates" well above those of pipeline design capacity, compressor design capacity, and well above "double," as pipe system pressure curves are significantly reduced, compressors run out on their curves, and initial pipeline pressure at time of rupture on both the upstream and downstream ends of the rupture release at the sonic speed in the gas which is higher than the speed of sound. Our experience indicates pipeline rupture gas rates of release will be incredibly high, well above the NRC's inferred "double," for quite some time.

The NRC's further comment that they are using a conservative assumption by arguing that they are using peak rates over a longer period appear to be disingenuous. Pipeline ruptures of this magnitude generate incredibly high gas rates with extremely high heat fluxes that I have seen melt steel and vaporize aluminum at considerable distances. Such averaging misses the incredibly high heat fluxes associated with transient gas pipeline rupture releases. Lastly, I must comment on an additional statement made in the NRC letter to you that: "Likewise, a postulated fire at the gas pipeline would create a heat flux at the Indian Point site fence that could be a threat to humans, but would not be sufficient to melt plastic." While the above statement does not define the distance to the fence line from the rupture point it is my understanding that there is Indian Point "safety critical equipment" (approximately 100 feet from the pipeline) that is nearer than the fence boundary, and needed to safely cool down the facility during a plant emergency shutdown. A clear drawing needs to be provided to you that identifies the location of such "safety critical" equipment and its distance from the pipeline rupture site utilized in any process safety evaluation.

In conclusion, the NRC does not have the expertise nor have they called on appropriate expertise to provide a thorough and complete evaluation of the impact of this "first of its kind" proposed installation of a large diameter high-pressure natural gas transmission pipeline near a nuclear facility in a highly sensitive area. Such a prudent review requires special precautions to assure analyses are scientific, complete, and thorough (including possible interactions). It appears the claims of "need for security" have undercut verification that such a prudent analysis has been adequately performed. The NRC's review is not conservative and I would advise that you continue your pursuit of this matter until a complete and proper transient graph and subsequent analysis, as well as other important information is provided that would permit verification that

the 42-inch pipeline rupture will not prevent the safe shutdown of the Indian Point nuclear facility. It is my understanding that the close proximity of the plant switchgear station handling power leaving the nuclear plant would most likely be quickly lost in a nearby pipeline rupture, necessitating a nuclear facility emergency shutdown. It is thus important that parties demonstrate that such an event, even if low probability, will not prevent the nuclear facility from an emergency trip cool down. While I can appreciate the need for some security concerns, such concerns should not justify the use of poor tools or assumptions that provide little confidence that this issue has been adequately or prudently analyzed.

Respectfully,

Richard B. Kuprewicz

Richard B. Kuprewicz,
President,
Accufacts Inc

Document Content(s)

Extract from Safety Study: Integrity Management of Gas Transmission Pipelines in High Consequence Areas, NTSB SS 15-01, Section 3.2, p. 20-21 (January 27, 2015). Full report available at http://www.ntsb.gov/safety/safety-studies/Documents/SS1501.pdf.

Integrity Management of Gas Transmission Pipelines in High Consequence Areas

Safety Study

NTSB/SS-15/01
PB2015-102735

National Transportation Safety Board

NTSB/SS-15/01
PB2015-102735
Notation 8565A
Adopted January 27, 2015

Safety Study

Integrity Management of Gas Transmission Pipelines in High Consequence Areas

National Transportation Safety Board

490 L'Enfant Plaza, SW
Washington, DC 20594

National Transportation Safety Board. 2015. ***Integrity Management of Gas Transmission Pipelines in High Consequence Areas*****. Safety Study NTSB/SS-15/01. Washington, DC.**

Abstract: There are approximately 298,000 miles of onshore natural gas transmission pipelines in the United States. Although rare, failure of these pipelines poses a significant risk to the public, especially when pipelines traverse populated areas, known as high consequence areas (HCA). To ensure the physical integrity of their systems in HCAs, gas transmission pipeline operators have been required by the Pipeline and Hazardous Materials Safety Administration (PHMSA) to develop and implement integrity management programs since 2004.

The NTSB undertook this study because of concerns about deficiencies in the operators' integrity management programs and the oversight of these programs by PHMSA and state regulators—concerns that were also identified in three gas transmission pipeline accident investigations conducted by the NTSB in the last five years. These accidents resulted in 8 fatalities and over 50 injuries, and they also destroyed 41 homes. This study used both quantitative and qualitative approaches. Data analysis was combined with insights on industry practices and inspectors' experiences obtained through interviews and discussions with pipeline operators, state and federal inspectors, industry associations, and other stakeholders.

This study found that while the PHMSA's gas integrity management requirements have kept the rate of corrosion failures and material failures of pipe or welds low, there is no evidence that the overall occurrence of gas transmission pipeline incidents in HCA pipelines has declined. This study identified areas where improvements can be made to further enhance the safety of gas transmission pipelines in HCAs. Areas identified for safety improvements include (1) expanding and improving PHMSA guidance to both operators and inspectors for the development, implementation, and inspection of operators' integrity management programs; (2) expanding the use of in-line inspection, especially for intrastate pipelines; (3) eliminating the use of direct assessment as the sole integrity assessment method; (4) evaluating the effectiveness of the approved risk assessment approaches; (5) strengthening aspects of inspector training; (6) developing minimum professional qualification criteria for all personnel involved in integrity management programs; and (7) improving data collection and reporting, including geospatial data.

The National Transportation Safety Board (NTSB) is an independent federal agency dedicated to promoting aviation, railroad, highway, marine, pipeline, and hazardous materials safety. Established in 1967, the agency is mandated by Congress through the Independent Safety Board Act of 1974 to investigate transportation accidents, determine the probable causes of the accidents, issue safety recommendations, study transportation safety issues, and evaluate the safety effectiveness of government agencies involved in transportation. The NTSB makes public its actions and decisions through accident reports, safety studies, special investigation reports, safety recommendations, and statistical reviews.

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From 1994–2013, total gas transmission pipeline mileage increased from 293,438 miles to 298,302 miles — an overall increase of only two percent. However, significant incidents increased considerably during this period. Figure 5 shows that the rates of significant gas transmission pipeline incidents exhibited a gradual increasing trend throughout the 20-year period. The average annual significant incident rate increased from 0.13 (pre-gas IM rule, 1994–2003) to 0.19 (post-gas IM rule, 2004–2013) incidents per 1,000 miles of pipeline. One potential factor is a price change over time that can impact the determination of whether an incident is considered significant.[42] Using data presented in Table 2, the average number of injured persons increased from 8 persons per year from 1994–2003 to 10 persons per year from 2004–2013, while average fatalities remained at two fatalities per year for both time periods. The NTSB concludes that there has been a gradual increasing trend in the gas transmission significant incident rate between 1994–2004 and this trend has leveled off since the implementation of the integrity management program in 2004.

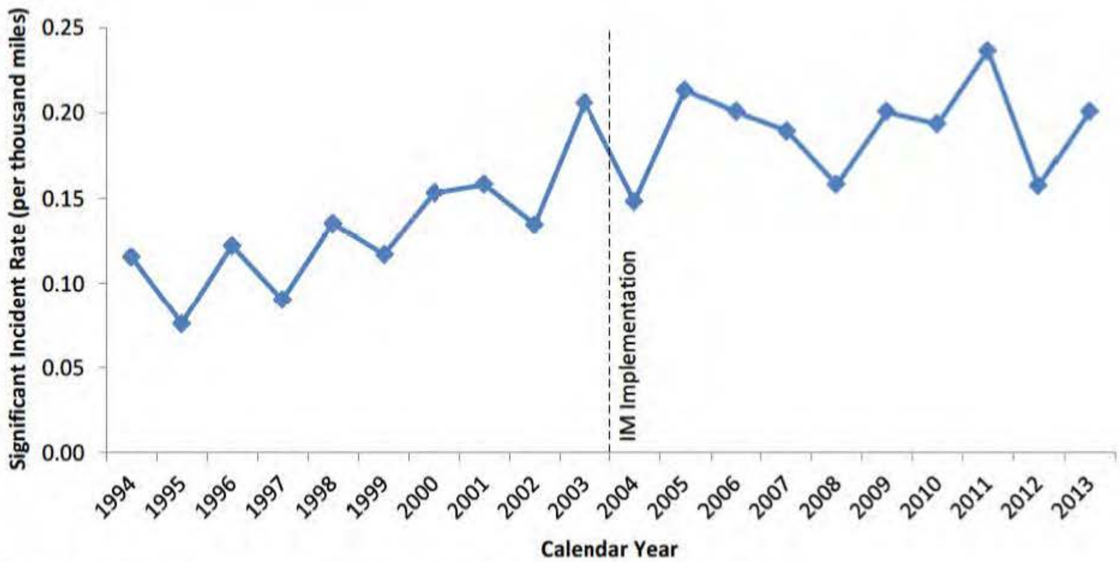

Figure 5. Significant incident rate per thousand miles (1994–2013)

3.2 HCA Incidents

PHMSA's annual report provides mileage data for all gas transmission pipelines but only began to report HCA mileage in 2010.[43] Therefore, HCA-related incident rates can only be calculated from 2010–2013. Table 3 shows incident counts and mileage by HCA classification from 2010–2013.[44] Due to the reporting criteria change in 2011 and the short time frame, it is

[42] Based on communication with PHMSA staff.

[43] HCA mileages for 2010-2013 were obtained from data from PHMSA's Annual Report, section L. Specifically, we used onshore gas transmission pipeline IM program mileage. Non-HCA mileage was computed by subtracting HCA mileage from the total onshore gas transmission pipeline mileage.

[44] The cost of lost gas was removed as an incident reporting criterion, and the quantity of lost gas was added as an incident reporting criterion. See http://primis.phmsa.dot.gov/comm/reports/safety/docs/IncidentReportingCriteriaHistory1990-2011.pdf.

difficult to discern trends in the data; rather, averages of incidents and mileages by HCA classification are presented for the four-year period. The percentage of HCA pipeline miles compared to all gas transmission pipeline miles remained constant. On average, seven percent of all onshore gas pipelines are HCA pipelines. However, 11 percent of all reported onshore gas transmission pipeline incidents occurred on HCA pipelines. Figure 6 shows that for all reported incidents as well as significant incidents, the average incident rates were higher for HCA pipelines when compared to non-HCA pipelines. While it may seem expected that incident rates would be higher in densely populated areas like HCAs due to the greater likelihood of property damage and casualties, gas IM requirements are specifically designed to reduce risk in HCAs. The NTSB concludes that from 2010–2013, gas transmission pipeline incidents were overrepresented on HCA pipelines compared to non-HCA pipelines.

Table 3. Total incidents and mileage by HCA classification (2010–2013)

Year	Incidents				Miles			
	Non-HCA	HCA	All	Percent HCA	Non-HCA	HCA	All	Percent HCA
2010	78	6	84	7	279,320	20,223	299,343	7
2011	96	10	106	9	279,372	20,351	299,723	7
2012	75	14	89	16	278,742	19,820	298,562	7
2013	84	12	96	13	278,687	19,615	298,302	7
Average	**83**	**11**	**94**	**11**	**279,030**	**19,030**	**298,983**	**7**

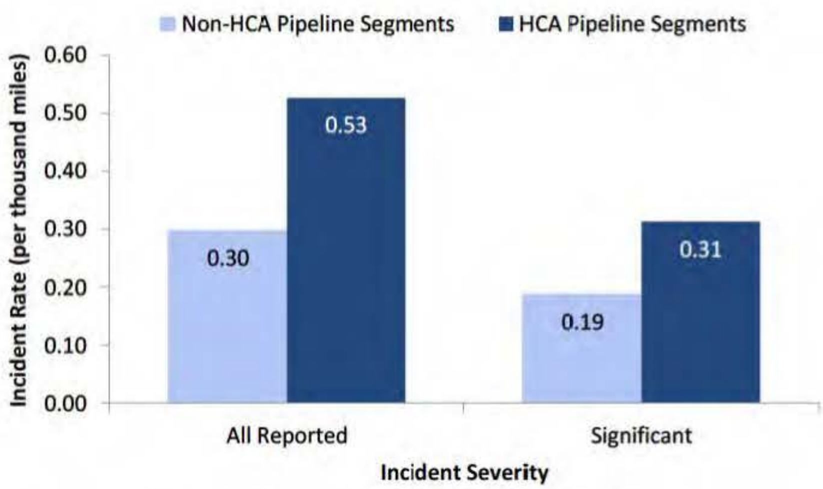

Figure 6. Average incident rates per 1,000 miles by HCA classification and incident severity level (2010–2013)

3.3 Incidents by Cause

IM programs require an evaluation of all potential threats that, if left unmitigated, may lead to pipeline incidents such as ruptures or leaks. As discussed in chapter 1, these threats must

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March 27, 2020

To: Suzanne Dennis
U.S. Nuclear Regulatory Commission

Subject: ***Review of NRC confirmatory analysis regarding fire and explosion for Algonquin gas transmission line at Indian Point nuclear power plant***

The following provides a review of dispersion and explosion hazard analysis conducted by staff at the U.S. Nuclear Regulatory Commission (NRC) [1] regarding a 42" diameter natural gas pipeline next to the nuclear power plant, Indian Point Energy Center (IPEC) near Buchanan, New York.

This review includes:

- Evaluation of whether the models specified in the US NRC regulatory guide 1.91 [2] were used appropriately.
- Verification of the results using the models used in the analysis.
- Preliminary vapor cloud dispersion simulation using Computation Fluid Dynamics (CFD).
- Summary of review.

The following provides further description of each of these items as well as results and discussion thereof. Note that the request by NRC was urgent and required that Sandia provided the review within three weeks. Because of the limited time available the independent analysis performed by Sandia is considered preliminary for reasons discussed in section 3.

Additionally, appendix A provides a calculation of incident heat flux seen at IPEC safety related reinforced concrete structures. The calculation is based on NUREG/CR-3330 which provides an analysis on the amount of time nuclear safety related concrete structures can withstand various incident heat fluxes [A.1].

1. Evaluation of the appropriate use of models:

a. Model Description

As specified in the US NRC regulatory guidelines 1.91, the NRC analysis uses the recommended ideal blast wave TNT equivalency method to determine the blast overpressure from a vapor cloud explosion. This method is described in a guideline document by Factory Mutual (FM) [3] cited in the NRC regulatory guidelines 1.91. The Factory Mutual document provides yield factors (or efficiency numbers) and heat of combustion values required as inputs into the model and discussion regarding the appropriate use and limitations of the model.

The equations used in the model are the following.

$$E = \alpha \Delta H_c m_f \quad (1)$$

$$W_{TNT} = \frac{E}{H_{detonation\,TNT}} \quad (2)$$

$$R_{min} = Z * W_{TNT}{}^{1/3} \quad (3)$$

where

E = blast wave energy
α = yield or efficiency number
ΔH_c = theoretical net heat of combustion
m_f = mass of vapor released
$H_{detonation\,TNT}$ = heat of detonation of TNT
R_{min}= distance from explosion where peak positive overpressure equals 1.0 psi (6.9 kPa)
Z = scaled distance (45 ft/lb$^{1/3}$or 18 m/kg$^{1/3}$)
W_{TNT} = TNT equivalent mass

b. Model inputs

Mass of vapor released
The NRC analysis considered the release from one side of the rupture and uses ALOHA to determine the mass of the vapor cloud. The scenario evaluated is of a full-bore above-ground release. Such a scenario was realized in the natural gas pipeline accident in Carlsbad, New Mexico as described in the National Transportation Safety Board report [4] in which a 49-ft section of corroded pipe was blown off through the soil leaving a large crater.

The pipeline is assumed to have manual closure of the isolation valves within 3 minutes where the distance between isolation valves is 3 miles. Thus, for a release from one pipe end rather that two, both isolation valves would have to be closed and the release would occur at one end of the 3-mile section or next to one of the isolation valves. Based on this distance, the pipe length was entered as 3 miles in ALOHA and the closed option selected which means the pipe is closed off at one end. ALOHA uses equations for choked flow assuming an ideal gas in which the flow rate

decreases over time due to the pressure drop and closed end of the pipe. The analysis considers a release over 1 minute using the maximum sustained average flow rate. An explosion calculation was also performed by NRC using ALOHA which calculates overpressure distances using the Baker-Strehlow method which incorporates factors for obstacles.

The NRC guidelines 1.91 cite reference [5] for methods of estimating the mass of the vapor cloud. The reference provides a range of possible models to use from integral to CFD-based models and ALOHA is among those listed which is considered an integral-based model. ALOHA is not capable of modeling topography and congestion and does not have models for supercritical releases which will be discussed in section 3. The NRC guidelines does state:

> *"For releases of vapor clouds at offsite location or pipelines, plume modeling based on site topography and meteorological conditions should be evaluated. The atmospheric transport of released vapor clouds should be calculated using dispersion or diffusion models that permit temporal as well as spatial variations"*

Since ALOHA cannot model topography and temporal variations, it is not appropriate for use if the above guideline is to be followed. It also does not model supercritical fluids which require models for real gases since it assumes the ideal gas law.

Yield factor

The parameter, α, in equation 1 is the yield factor or efficiency number which indicates the fraction of available combustion energy participating in blast wave generation.

As stated in the FM guideline document,

> *"It cannot be overemphasized that assigning of an explosion efficiency number to a potential gas release incident is, with current technology, and entirely arbitrary exercise"*

This is a key point because as discussed in the FM guideline a release in a congested area such as dense vegetation, vehicles, and buildings can result in significantly higher overpressures. The congestion will result in a range of yield values which is not accounted for by the TNT equivalency method. It is also noted that the method represents the explosion as a point source which is not representative of the pressure signature of vapor cloud explosions which tend to have greater pressures in the far field and of longer duration than predicted from the model. Due to the point-source representation of the model, overpressures are overpredicted in the near field and underpredicted in the far field and are of shorter duration than vapor cloud explosions. Lower overpressures of longer duration have the potential to be more damaging to structures than higher overpressures of short duration. It is further noted in the FM guideline that the method despite its drawbacks is often used to provide an approximate evaluation and that when very specific design basis building siting is required the method is inappropriate.

Related to the discussion provided in the FM guideline is the following statement provided in the NRC guideline 1.91:

> *"A detailed analysis of possible accident scenarios for particular sites, including consideration of the actual amount of potentially explosive material, potential release, site topography, and prevailing meteorological conditions, should be used to justify a value for the yield. However, for establishing safe standoff distances independent of site conditions, the use of a conservative estimate for the yield is prudent"*

The NRC guidelines 1.91 refers to the FM guideline for recommendations regarding the yield factor. The FM guideline recommends a yield factor of 0.05 for a Class I material such as natural gas based upon historical evidence which has indicated yields of 0.01 to 0.05 for typical hydrocarbons, though yields as high as 50% have been recorded and even very low estimated yields (~0.001) have caused extensive damage. Thus, it's difficult to determine what value is considered conservative.

The NRC analysis used the recommended yield factor of 0.05 but did not account for site-specific conditions such as congestion and surrounding topography. A key question is whether the site surrounding the pipeline can result in much higher yields than 0.05 given the congestion as shown in Figure 1. The pipeline shown in Figure 1 is between IPEC and Buchanan or approximately 1600 ft from IPEC. It is evident that the surrounding area is highly congested with vegetation, structures, and vehicles indicating that more detailed analysis would be warranted based on recommendations in both guidelines. The FM guidelines recommends the TNO Multi-Energy Model for congested sites and is discussed in that document. The main assumption of the NRC analysis is that the since the vapor cloud is buoyant will rise and rapidly disperse above the surrounding vegetation and structures. This validity of the assumption will be discussed in section 3.

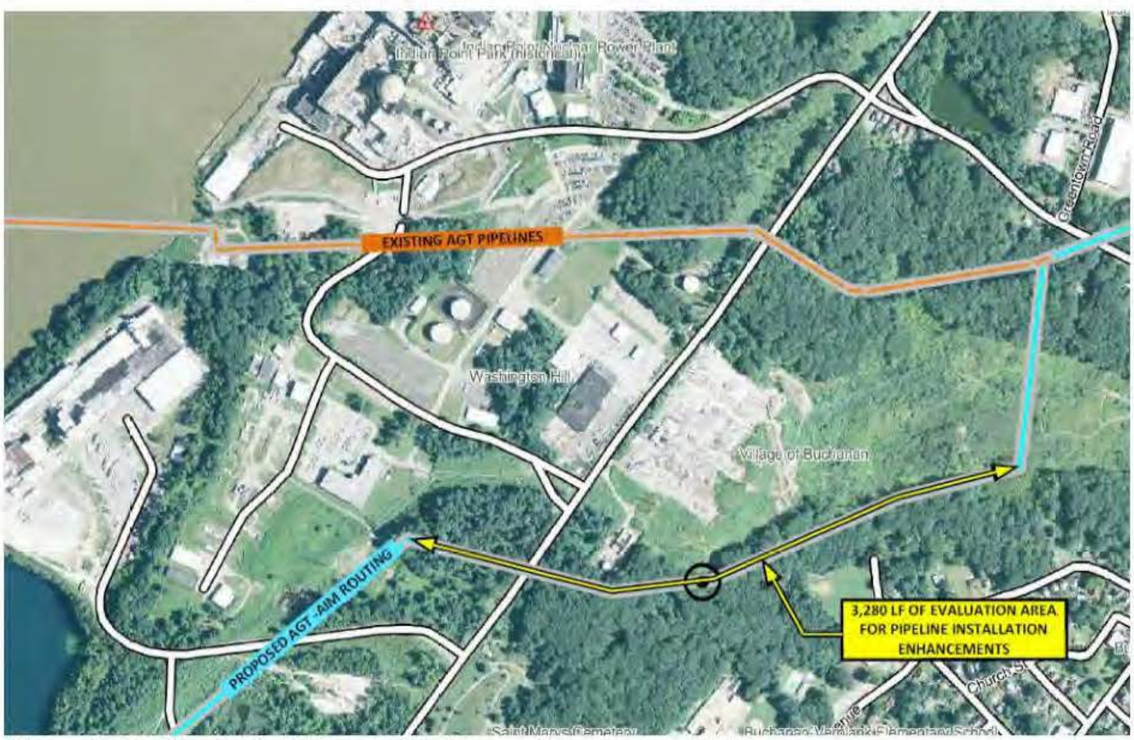


Figure 1: Indian Point Energy Center and Buchanan, NY.

Heat of Combustion

The NRC guidelines 1.91 refers to either NUREG-1805 [6] or the FM guidelines for the heat of combustion, though the FM guidelines does not specify the value for methane or natural gas. In ref. [6] the heat of combustion for liquefied natural gas composed mostly of methane is provided as 50,000 kJ/kg. The NRC analysis used a value of 50,030 kJ/kg for methane. This results in a higher blast wave energy, though of an insignificant amount (0.06%) compared to using a value of 50,000 kJ/kg.

Heat of Detonation

In equation (2) the denominator, that is the heat of detonation, is given as 4420 kJ/kg (1900 BTU/lb_m) in the NRC guidelines 1.91 where reference [7] is cited as the source for the value. The reference [7] source provides a value of 4500 kJ/kg (1935 BTU/lb_m) rather than 4420 kJ/kg. To check the validity of these values, a resource by a recognized expert in the field of explosives [8] was used. Reference [8] states that the heat of detonation can be determined using three approaches, two theoretical approaches and experimentally. From a theoretical approach using the thermodynamic work function the value is 4853 kJ/kg and that using the hydrodynamics work function the value is 4519 kJ/kg. Experiment has indicated a value of 4686 kJ/kg. Thus, among these values the most conservative is 4519 kJ/kg which is above 4500 kJ/kg indicating that 4500 kJ/kg is a reasonable value to use. It is uncertain as to where the value 4420 kJ/kg was obtained in the NRC guidelines.

Duration of release

The amount of mass of vapor used in equation 1 will determine by the duration of the release. One of the key assumptions of the NRC analysis is that the vapor cloud will be buoyant and disperse within the first minute and thus only considered the mass released over 1 minute. The full release duration is never considered whether the release is 3 minutes or 60 minutes thereby making the time at which the isolation valves are closed irrelevant. There is no evidence or justification presented for this assumption. Note that it is recommended in the FM guideline document that for a pipeline release it should be assumed that the pipeline is completely severed, and the duration of discharge should be 10 minutes flowing from both ends of the severed pipe even if automatic or manual block valves are present. An exception to this recommendation is not made for methane in the FM guideline.

2. Verification of the results

a. *Explosion*

The results of the explosion calculations by the NRC analysis and verification by Sandia National Laboratories (SNL) are provided in Table 1. Note that the pipeline pressure is 850 psig and in ALOHA the absolute pressure should be entered which would be 864 psia. Based on this verification, the NRC analysis appeared to have used 850 psia. If 864 psia is used, the average flow rate would increase to 261,000 lbs/min and the resulting distance to an overpressure of 1 psi is 2365 ft which is not a significant different than the distance of 2351 ft obtained from the NRC analysis. Note that in Table 1 the distance verified by Sandia is using a pressure of 850 psia to determine if the NRC results could be reproduced.

The NRC analysis used the maximum average flow rate obtained from ALOHA from a closed-end 3-mile pipeline, considering a release for 1 minute before the cloud is ignited. The NRC analysis used both the TNT equivalency method and ALOHA to calculate the blast overpressure distance to 1 psi. The delay time that was used for the ALOHA calculation for the 1-minute release was not specified in the NRC analysis. SNL could only reproduce the results approximately if a delay time of 8 minutes is specified providing a distance of 3057 ft. If the delay time is not specified, but is chosen by ALOHA the distance is much greater, providing 9504 ft. The distance calculated by NRC using ALOHA for this case was discounted as mentioned in the report that vapor dispersion in a congested area is not credible because the methane cloud is buoyant and will quickly rise and disperse rapidly.

The NRC analysis also considered a 60-minute release using ALOHA to calculate the maximum average sustained flow rate of 311,000 lbs/min. The mass released over the first minute was considered and not the total mass released over 60 minutes. The NRC analysis assumes that since the cloud will be buoyant it will disperse within 1 minute and thus an explosion will occur during the first minute independent of release duration and thus uses a mass of 311,000 lbs for the TNT equivalency calculation. If the cloud is not immediately buoyant, then for a 60-minute release using the total mass calculated by ALOHA the result in 8872 ft or 1.7 miles. The assumption of whether the vapor cloud is immediately buoyant or if it behaves as a dense gas which will greatly extent the time before the cloud is diluted below the lower flammability limit is discussed in section 3a.

Table 1: Results of explosion calculation for NRC analysis and SNL verification

Scenario	Pipe distance	Mass released	Distance to 1 psi blast overpressure	Results of verification by SNL using same methods
Explosion from one side of full-bore rupture release	3 miles (distance between isolation valves)	256,000 lbs for 1 minute using 'closed' end of pipe option in ALOHA	2351 ft (TNT) 3054 ft (ALOHA, with congestion)	2349 ft (TNT) 9504 ft (ALOHA, with congestion)
Explosion from one side of full-bore rupture release	3 miles (distance between isolation valves)	Release over 60 minutes using 'infinite source' option in ALOHA. • 311,000 lbs/min maximum average sustained flow rate • Total amount released 13,785,499 lbs	2509 ft (TNT - mass released for first minute)	2507 (TNT – mass released for first minute) 8872 ft (TNT – total mass released)

3. Computational fluid dynamics simulations

A preliminary simulation was performed to determine the extent of the vapor cloud using two Computation Fluid Dynamics (CFD) codes, namely ANSYS Fluent for supercritical pipe flow and Fire Dynamics Simulator (FDS) for dispersion. The results from the pipe flow simulation is used to provide an approximate boundary condition for the natural gas release in FDS. Two separate simulations were performed because the pipe flow involves very high-speed flow which requires very

small timesteps which would greatly increase the dispersion calculation if both the pipe and dispersion flow were coupled in a single simulation. Thus, pertinent values for the pipe flow simulation were assessed several diameters from the pipe exit where velocities are much lower than near the exit. FDS was chosen to perform the dispersion simulation instead of ANSYS Fluent because FDS has been validated for dense-gas dispersion [9], though ANSYS Fluent has the pertinent physics to model dispersion.

It is highly stressed that the simulations are considered preliminary because a simulation study involves validation, evaluation of parameter sensitivity, and evaluation of grid independence to evaluate the level of uncertainty in predictions. Additionally, the accuracy of the real-gas equation of state used has not been evaluated. Other models specifically for natural gas have been recently developed [10] [11] but require extensive effort to implement into ANSYS Fluent which would not allow for this review to be completed in the timeline required. Also due to the limited time available to perform this analysis, the actual topography of the site is not included in the dispersion calculation.

a. Pipe simulation

The flow of natural gas in the 42" diameter pipe is supercritical at 850 psi for temperatures 200 K and greater shown in Figure 2. Thus, a real-gas equation of state is used rather than the ideal gas equation. The flow is under-expanded choked flow in which the Mach number is 1 at the exit. Specifications provided in Table 2 and the domain shown in Figure 3 were used for the simulation.

Results from this simulation are shown in Figures 4 through 7. Figure 4 shows an axisymmetric contour plot of the Mach number which indicates choked flow. Figure 5, showing an axisymmetric contour plot of velocity, indicates that the velocity at the exit of the pipe is about 375 m/s and that a downstream shock wave occurs which has a velocity of about 970 m/s. Especially significant to this review are the temperature and density contour plots shown in Figure 6 and Figure 7, respectively, since the statement has been made in the NRC analysis that the vapor cloud will immediately become buoyant. The results indicate that the region just before the shock wave would result in condensation of the methane and in regions after the shock would condense water allowing for the cloud to be visible. Note that the simulations did not include multiphase flow but would be required for a detailed analysis.

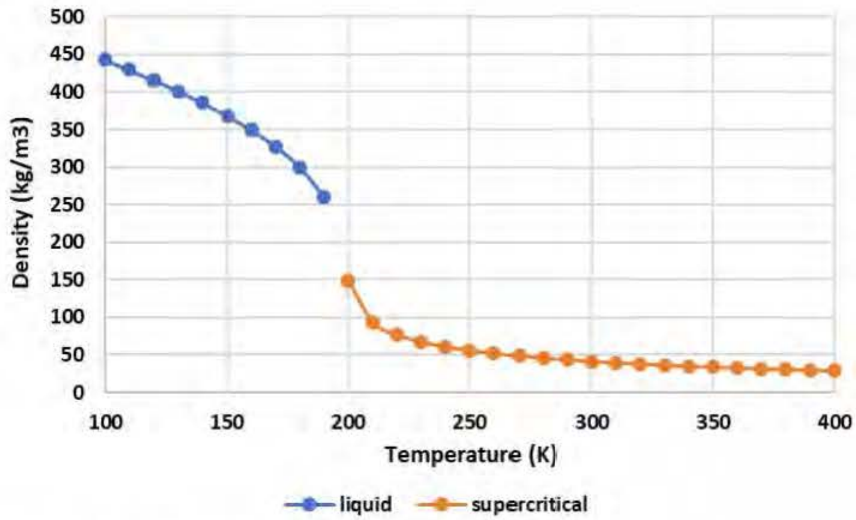


Figure 2: Temperature versus density of methane at 850 psi (https://webbook.nist.gov/chemistry/fluid).

Table 2: Specifications for pipe flow simulation

Specification	Value
Pipe diameter	1.07 m
Pipe length	100 m
Length, height of region beyond the pipe	50 m, 25 m
Fluids	methane, air
Equation of State	Soave-Redlich-Kwong
Inlet temperature	283 (K) (50ºF)
Inlet pressure	5.861 (MPa) (850 psi)

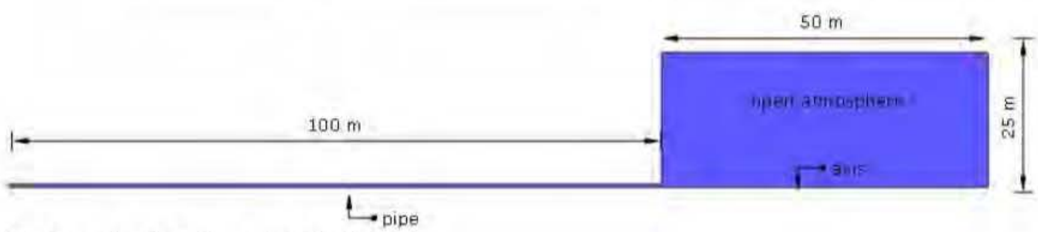


Figure 3: Domain for pipe simulation.

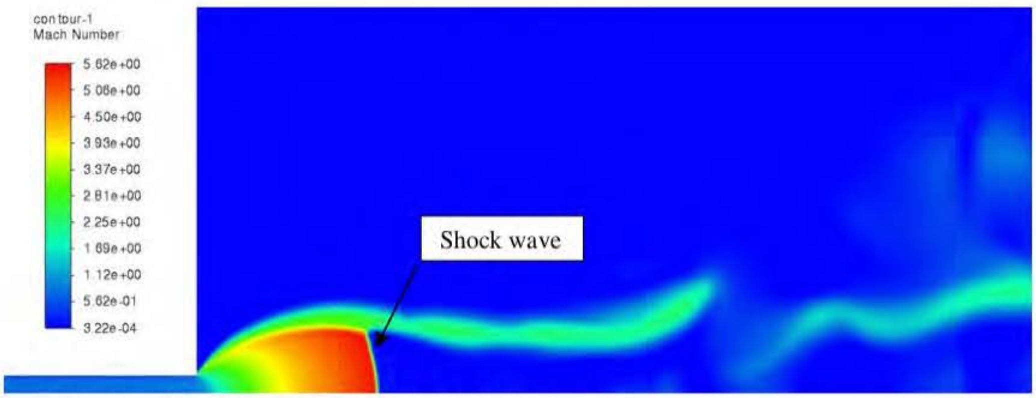


Figure 4: Axisymmetric view of Mach number contours.

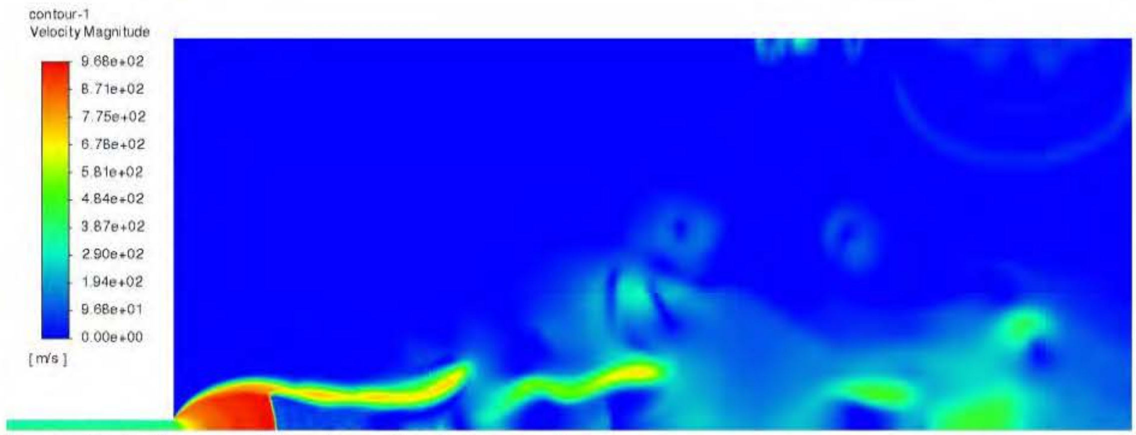


Figure 5: Axisymmetric view of velocity contours.

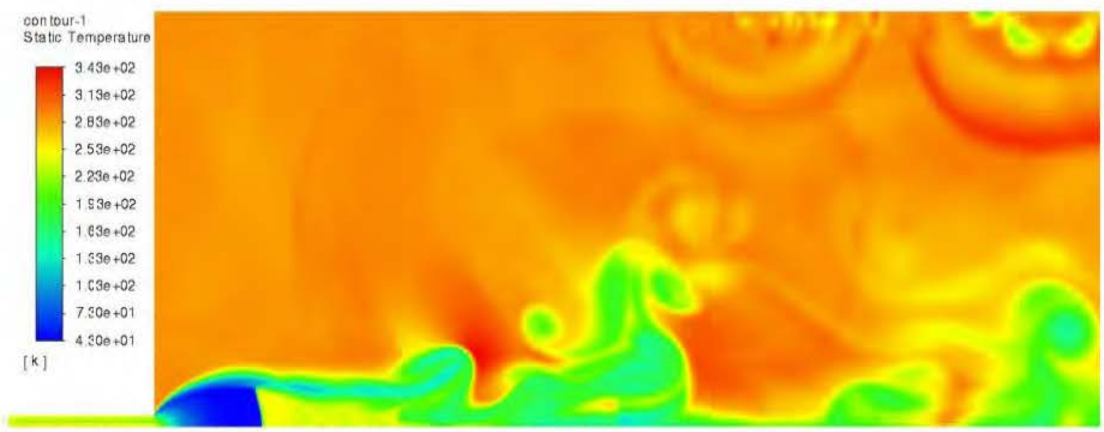


Figure 6: Axisymmetric view of temperature contours.

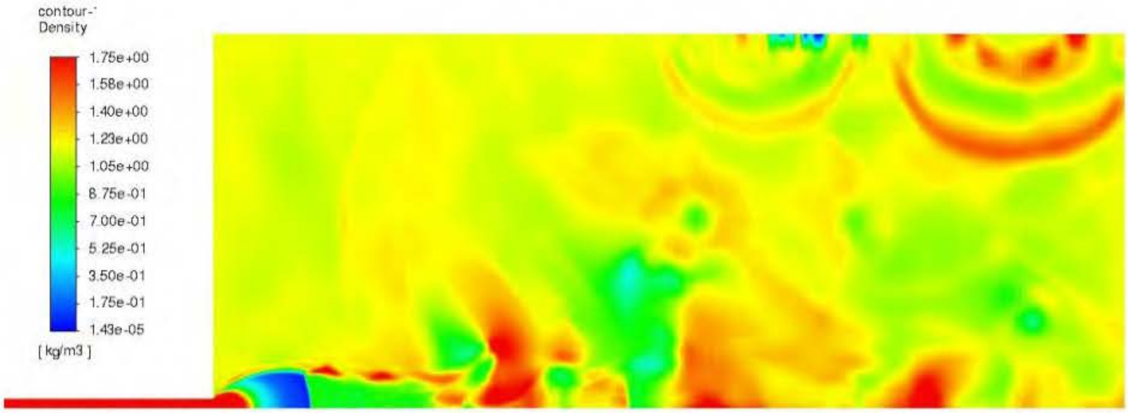
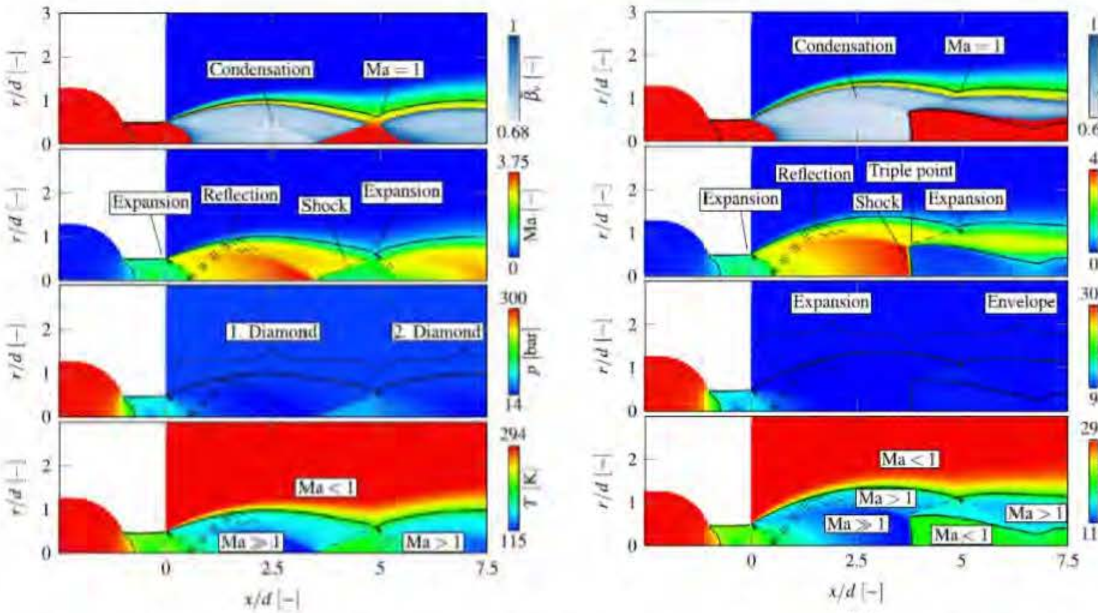


Figure 7: Axisymmetric view of density contours.

Under-expanded compressible flow can produce a series of progressively weaker shock waves that form a diamond pattern. The pattern will not continue indefinitely but will be diffused from viscous effects and will no longer maintain their pattern. The pattern formed will depend on the exit pressure which for this simulation was approximately 350 psi (2.3 MPa or 24 bar). Illustration of variation of patterns is shown in Figure 8 which are simulation results taken from reference [12] of under-expanded methane jets for two different exit pressures, 20 bar (290 psi) and 12 bar (174 psi). Notable is that both cases results in regions of condensation. The pattern of the simulation results presented in Figures 4 through 7 are closest to the exit pressure of 12 bar shown in Figure 8b. Though this should be caveated with the understanding that this is a preliminary simulation and that additional investigation is needed to improve accuracy for the reasons noted previously. For instance, the region beyond the pipe exit uses a stretched mesh in which cell sizes become increasing larger further away from the exit. It was necessary to use a relatively coarse mesh in this region in order to reduce computational run time to meet the project's timeline. Since the flow may not be sufficiently resolved past the initial shock wave, potential subsequent shocks forming the diamond pattern may not be captured. Also, due to the under resolution, the turbulence viscosity was artificially high which resulted in enhanced mixing. It is anticipated more detailed structure similar to reference [12] would be captured as the mesh is refined possibly showing additional regions of condensation.



(a) (b)

Figure 8: Simulation results of underexpanded methane jet for exit pressure of (a) 20 bar and, (b) 12 bar. Figure taken from Banholzer, M, et al., "Numerical investigation of the flow characteristics of underexpanded methane jets", Phys. Fluids, 2019 [12].

The results from the present simulation and from reference [12] indicate that the vapor cloud would be a dense gas initially and not be immediately buoyant. Furthermore, the NRC analysis provides additional supporting evidence to the above that the issuing gas would be heavier than air. The NRC analysis uses a flow rate of 256,000 lbs/min (1939 kg/s) and a methane density issuing from the pipe exit of 0.67 kg/m^3 which is less dense than air. Given the area of the pipe (0.89 m^2), the resulting exit velocity would be 3,961 m/s for this assumed density which would not be choked flow. To satisfy choked flow with an exit velocity of about 375 m/s, the density would have to be around 6 kg/m^3.

This has significant consequences for explosion hazards since dense gas vapor clouds in stable atmospheric conditions can travel significant distances [13] and will persist much longer than 1 minute. Additionally, the dense vapor cloud would travel through the surrounding vegetation and other infrastructure to provide an environment for a deflagration to detonation transition (DDT). Particularly since the natural gas is not 100% methane but can have up to 5% of other hydrocarbons such as ethane and propane. Small additions of these hydrocarbons can increase the sensitively of the gas to detonation [13].

Thus, it is recommended that the TNT equivalency model not be used but rather use a model that can include the effects of congestion such as the TNO multi-energy method [3]. And, if using ALOHA for explosion hazard assessment it is recommend that the 'congested' option be used. For a 256,000 lbs/min released from one end of the pipe for either 1 minute or 10 minutes using ALOHA with the congestion option, distances to 1 psi overpressure of 1.8 miles and 5 miles are predicted, respectively. As noted previously, ALOHA calculates overpressure distances using

the Baker-Strehlow method which incorporates factors for obstacles but isn't considered as accurate as the TNO multi-energy method.

b. Dispersion simulation

The simulation of the vapor cloud dispersion assumes that the safety valves could be shut in 12 minutes, doubling the time provided in the report by the Office of Inspector General of the NRC [14] from an interview with the Enbridge Energy Corporation, owners of Algonquin, which stated that it would take a minimum of 6 minutes to shut the isolation valves. For this preliminary simulation, the same flow rate as used by the NRC analysis of 256,000 lbs/min (1939 kg/s) was assumed for a double-sided full-bore release. This is because the release rate depends on the pipe length and the simulation of the pipe used a length of 100 m rather than a length of 3 miles due to computational run time. For any future investigation, flow rate as a function of pipe length should be evaluated. Based on the findings from the pipe simulation, the density of the gas is specified as 1.5 kg/m^3 by evaluating regions beyond the shock wave. Thus, the gas will be heavier than air and will persist and spread much further than if the cloud was lighter than air. Since the CFD code, FDS, used to model the vapor dispersion is designed for low Mach number flows, that is, Mach numbers up to about 0.3 a release velocity of 50 m/s is used which is about Mach 0.15, well below the limits of FDS. To use this velocity and match the mass release rate of (1939 kg/s), the area of the release had to be increased relative to the pipe diameter, that is, from 1.1 m to 6.6 m. Thus, the details of the dispersion will not be representative of the actual pipe near the release but will be representative of the vapor cloud in the far field providing an estimate of the extent of dispersal. The specifications used in the simulation is provided in Table 3.

Table 3: Specifications for dispersion simulation

Specification	Value
Duration of release	12 minutes
Diameter of release	6.6 m
Mass release rate	1939 kg/s (256,000 lbs/min) from two horizontal full-bore releases directed towards each other placed 15 m (50 ft) apart
Fluids	methane, air
Density of methane	1.5 kg/m^3
Atmospheric conditions	Stable (Monin-Obhukov relations), wind speed 1.5 m/s, temperature 293 K
Number of elements	80 M
Element size	0.2 m
Number of processors	168

The computational run time was much longer than typical dispersion simulations because of the relatively high release velocity (50 m/s vs. ~1 m/s). Typically, dispersion simulations will take about 1-2 days to complete depending on the number of elements required. For this dispersion simulation it took about a day to complete 200 seconds of real time. With an ending time of 1800 seconds, it would take about 9 days to complete. The simulation was terminated unexpectedly from the high-performance compute cluster, possibly due to high demand, at almost 500 seconds of real time and was not restarted in order to meet the project's timeline. At almost 500 seconds the vapor cloud reached the lower flammability limit (LFL – 5% vol.) at a distance of about 950 m (3,100 ft) from the

release point. Since the release doesn't terminate until 720 seconds (12 minutes), it is anticipated that the distance would increase if the simulation was continued. Also, even after the release is terminated, the cloud will drift downwind and take several minutes to dissipate resulting in greater distances to the LFL. Given the above, it is anticipated that the distance would extend beyond 1,600 m (5,248 ft) since the cloud is propagating in the downwind direction at a speed of about 100 m/min. Figure 9 shows a temporal sequence of the development of the vapor cloud from 1-8 minutes by plotting contours of methane volume fractions. Figure 10 provides methane volume fraction iso-contours of the upper flammability limit (UFL – 15% vol.) and LFL at about 8 minutes showing the distances in meters. Note that the cloud in the lateral extent is propagating beyond the computational domain indicating that for any future investigation the domain should be increased in the lateral extent.

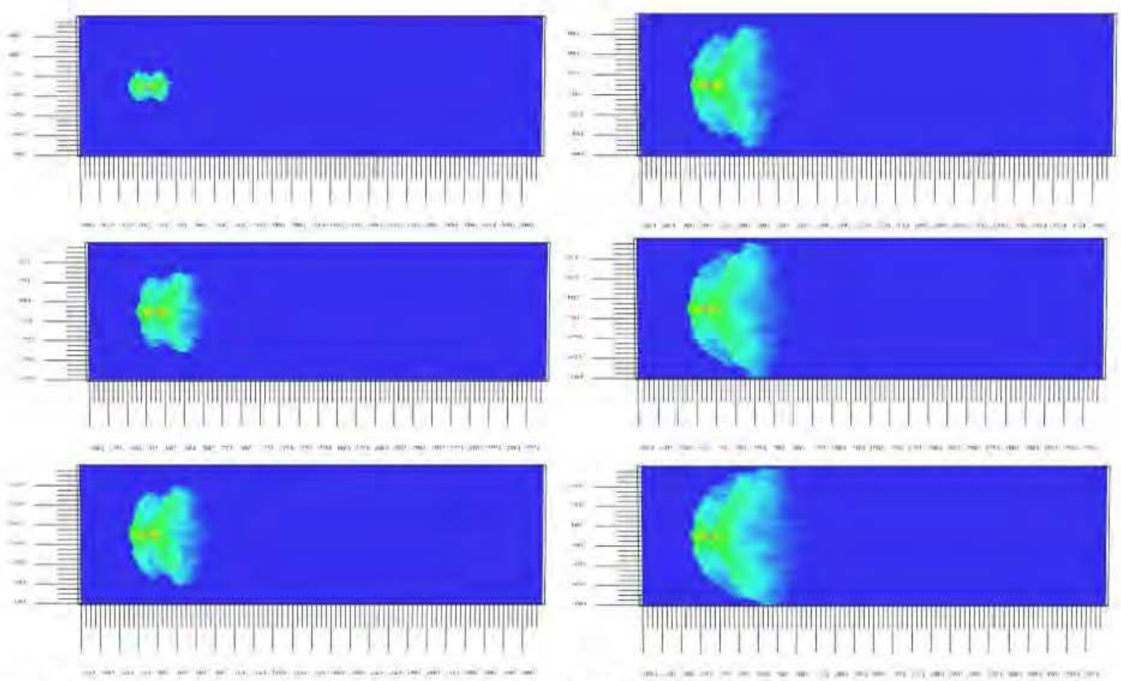


Figure 9: Sequence of top-view images of contour plots showing methane volume fraction from 1 to 8 minutes after release. Distances are in meters.

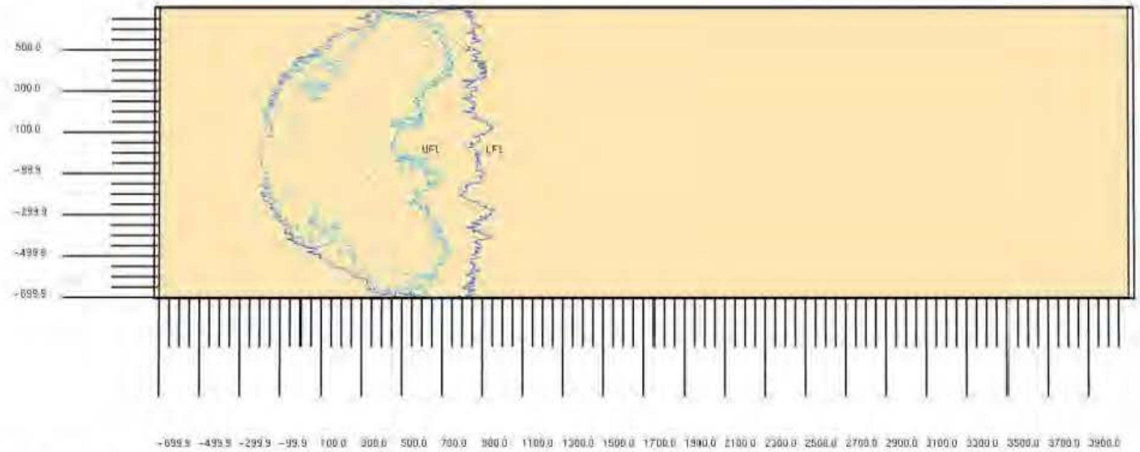


Figure 10: Top view, methane volume fraction iso-contours of lower flammability limit and ½ lower flammability at about 8 minutes. Distances are in meters.

Figure 11 shows a centerline side view of the vapor cloud at 8 minutes indicating that it has not risen like a buoyant cloud but rather displays dense gas behavior by keeping relatively close to the ground. The highest point of the vapor cloud is near the source with a height of about 50 m then decreases to about 20 m for downwind distances. Note that the vertical extent of the domain is 100 m. This dense gas behavior has implications with regards to explosion hazards since the vapor cloud would travel through vegetation and persist for a sufficient amount of time to result in potential ignition which can lead to a deflagration to detonation transition due to the congestion or have overpressures that exceed 1 psi from a deflagration explosion. The vapor cloud region between the flammability limits is roughly 1/3rd the cloud volume and if the cloud encounters an ignition source in congested areas, significant overpressures can result. The furthest point downwind distance within the flammability region is about 950 m (3,100 ft) at 8 minutes which is greater than any distance from the pipeline route to the SOCA (Security Owner Control Area) which varies from about 1580 ft to 2363 ft. The results from this simulation indicate that for this release scenario explosion overpressures of greater than 1 psi at the SOCA would most probably occur given the surrounding congestion.

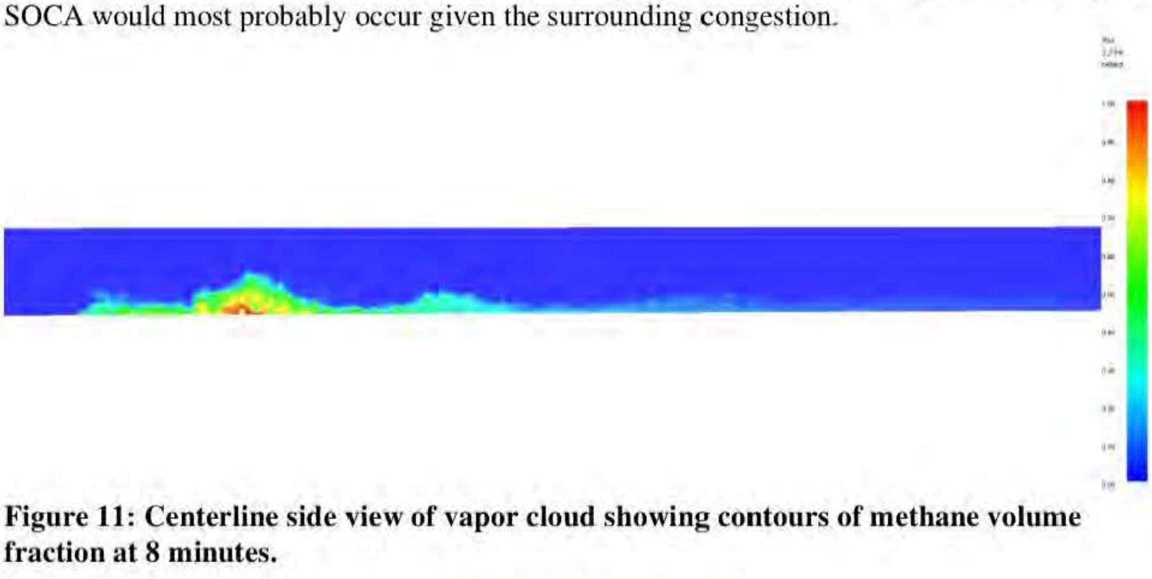


Figure 11: Centerline side view of vapor cloud showing contours of methane volume fraction at 8 minutes.

4. Summary of review

The following are the key findings from this review:

1. Evaluation of models used:
   - Correct heat of detonation value was used;
   - ALOHA does not model supercritical flow and topography which is applicable to this release scenario.
   - TNT equivalency model is inadequate for the release scenario.

2. The major assumptions of the NRC analysis that results in an underprediction of distances to an overpressure of 1 psi are:
   - The cloud will become immediately buoyant and disperse below the flammability limits within 1 minute regardless of when the pipeline can be closed. Thus, only the mass released over 1 minute is considered in the TNT equivalency calculations.
   - The cloud will not propagate through vegetation and congested areas since its density will be less than air.

3. The major findings from the preliminary SNL analysis are:
   - The vapor cloud will be heavier than air which will cause it to disperse near the ground and will persist after the pipe has been closed.
   - The dense-gas vapor cloud will propagate through the vegetation and congested areas which increases the likelihood of a deflagration to detonation transition.
   - The flammability region of the cloud will extend beyond any distance from the pipeline route to the SOCA (Security Owner Control Area) indicating a high likelihood of exceeding an overpressure of 1 psi at the SOCA.

   It is highly stressed that the simulations are considered preliminary because a simulation study involves validation, evaluation of parameter sensitivity, and evaluation of grid independence to evaluate the level of uncertainty in predictions. Also, the accuracy of the real-gas equation as not been evaluated for the pipe simulation and the actual topography of the site is not included in the dispersion simulation.

References

[1] Rao Tammara, US Nuclear Regulatory Commission, "Safety Review and Confirmatory Analysis, Entergy's 10 50.59 Safety Evaluation, Algonquin Incremental Market (AIM) Project, Indian Point Energy Center (IPEC)," October 16, 2014, also supplementary analysis undated.

[2] US Nuclear Regulatory Commission, Regulatory Guide 1.91 , "Evaluations of Explosions Postulated to Occur at nearby Facilities and on Transportation Routes Near Nuclear Power Plants," Revision 2, April 2013.

[3] Factory Mutual Global's Property Loss Prevention Data Sheets 7-42, "Guidelines for Evaluating the Effects of Vapor Cloud Explosions Using a TNT Equivalency Method," May 2008.

[4] National Transporation Safety Board, "Natural Gas Pipeline Rupture and Fire Near Carlsbad, New Mexico, August 19, 2000," NTSB/PAR-03/01, 2003.

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[6] U.S. Nuclear Regulatory Commission, NUREG-1805, "Fire Dynamics Tools (FDT) Quantitative Fire Hazard Analysis Methods for the U.S. Nuclear Regulatory Commission Fire Protection Inspection Program," ADAMS Accession No. ML043290075, Washington, D.C., December 2004.

[7] R. Zalosh, "Explosion Protection," in *SFPE Handbook of Fire Protection Engineering, 2nd ed.*, Boston, MA, Society of Fire Protection Engineers (SFPE), June 1995, pp. Chapter 16, section 3.

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[9] A. Luketa and B. Romero, "Model Evaluation Report for LNG Dispersion on Fire Dynamics Simulator Version 6.5.3," Sandia National Laboratories, Albuquerque, NM, SAND2018-12248, 2018.

[10] Elshahomi, V, et al., "Two-dimensional CFD modelling of gas decompression," in *The 6th International Pipeline Technology*, Online: http://ro.uow.edu.au/eispapers/3342, 2013.

[11] O. Kunz and W. Wagner, "The GERG-2008 Wide-Range Equation of State for Natural Gas and Other Mixtures: An Expansion of GERG-2004," *J. Chem. Eng. Data,* vol. 57, pp. 3032-3091, 2012.

[12] M. Banholzer, W. Vera-Tudela, C. Traxinger, M. Pfitzner, Y. Wright and K. Boulouchos, "Numerical investigation of the flow characteristics of underexpanded methane jets," *Phys. Fluids,* vol. 31, no. 056105, 2019.

[13] A. Luketa-Hanlin, "A review of large-scale LNG spills: Experiments and modeling," *J. Haz. Mat.,* vol. A132, pp. 119-140, 2006.

[14] Office of the Inspector General, U.S. Nuclear Regulatory Commission, "Concerns Pertaining to Gas Transmission Lines at the Indian Point Nuclear Power Plant," Case No. 16-024, February 13, 2020..

Appendix A: NUREG/CR-3330 Calculation

Prepared By
Jamal Mohmand
Member of Technical Staff

Phone: (505) 844-3282
Email: jamohma@sandia.gov

NUREG/CR-3330 provides an example calculation of a fire accident scenario for a high-pressure natural gas pipeline. In the sample calculation a discharge from a 36-inch pipeline operating at 1000 psig [A.1]. From 3-1 the average flow rate of 1700 kg/s from the range of 1400-2100 kg/s was applied to the calculation.

Using the equations provided in the NUREG the results can be replicated and applied to the AIM pipeline situation. There are three main steps in calculating the incident heat flux applied to the reinforced concrete safety related structures.

Step 1: Calculate the radiated power (PR), using Equation 3.1
Step 2: Calculate the radius and diameter of the spherical flame
Step 3: Calculate the incident radiation at various distances using Equations 4.1 and 4.21
Note 1: For Transmissivity in Step 3, the 20% Relative Humidity Curve on Figure 3-2 was used

Applying this methodology to the AIM pipeline the same variable assumptions were made, except for the mass flow rate of the 42-inch pipeline operating at 850 psig. According to the NRC's Review and Confirmatory Analysis the mass flow rate for the pipeline is 1935 kg/s [A.2]. The value was rounded to 1940 kg/s for the sake of this calculation and is referred to as the Nominal Case.

According to Table 3-1 of the NUREG a pipeline of 42-inch diameter would have a mass flow rate between 2000-3200 kg/s. To illustrate the impact of a pipeline of larger mass flow rate on incident heat flux a value of 4000 kg/s was used to calculate the last set of values this referred to as the Bounding Case.

Below in Table A-1 the results of incident heat flux on reinforced safety related concreate structure are shown for distances of 482, 500, 700, 1000, and 1500 meters. The Security Owner Control Area (SOCA) fence is 482 meters away. Within the SOCA are all the safety related structures. The Emergency Diesel Generators (EDGs) are roughly 700 meters from the pipeline.

Table A-1: Incident Radiation at Various Distances and Mass Flow Rates

Case	Distance (m)	Mass Flow Rate (kg/s)	Radiated Power (kW)	Fire Diameter (m)	Transmissivity	Incident Radiation (kW/m^2)
Sample	482	N/A	N/A	N/A	N/A	N/A
	700	N/A	N/A	N/A	N/A	N/A
	500	1700	4.09E+07	295	0.7	19.6
	1000				0.63	4.6
	1500				0.57	2.0
Nominal	482	1940	4.57E+07	312	0.7	23.6
	500				0.7	22.1
	700				0.65	9.6
	1000				0.63	5.3
	1500				0.57	2.2
Bounding	482	4000	9.61E+07	452	0.7	44.1
	500				0.7	41.5
	700				0.65	18.9
	1000				0.63	10.7
	1500				0.57	4.4

Using the bounding mass flow rate of 4000 kg/s the incident heat flux on safety related structures if located at 482 meters would be 44 kW/m^2. Note that the same parameter assumptions were made as were made in the sample calculation; combustion efficiency, fraction of excess entrained air, and flame temperature may affect the results.

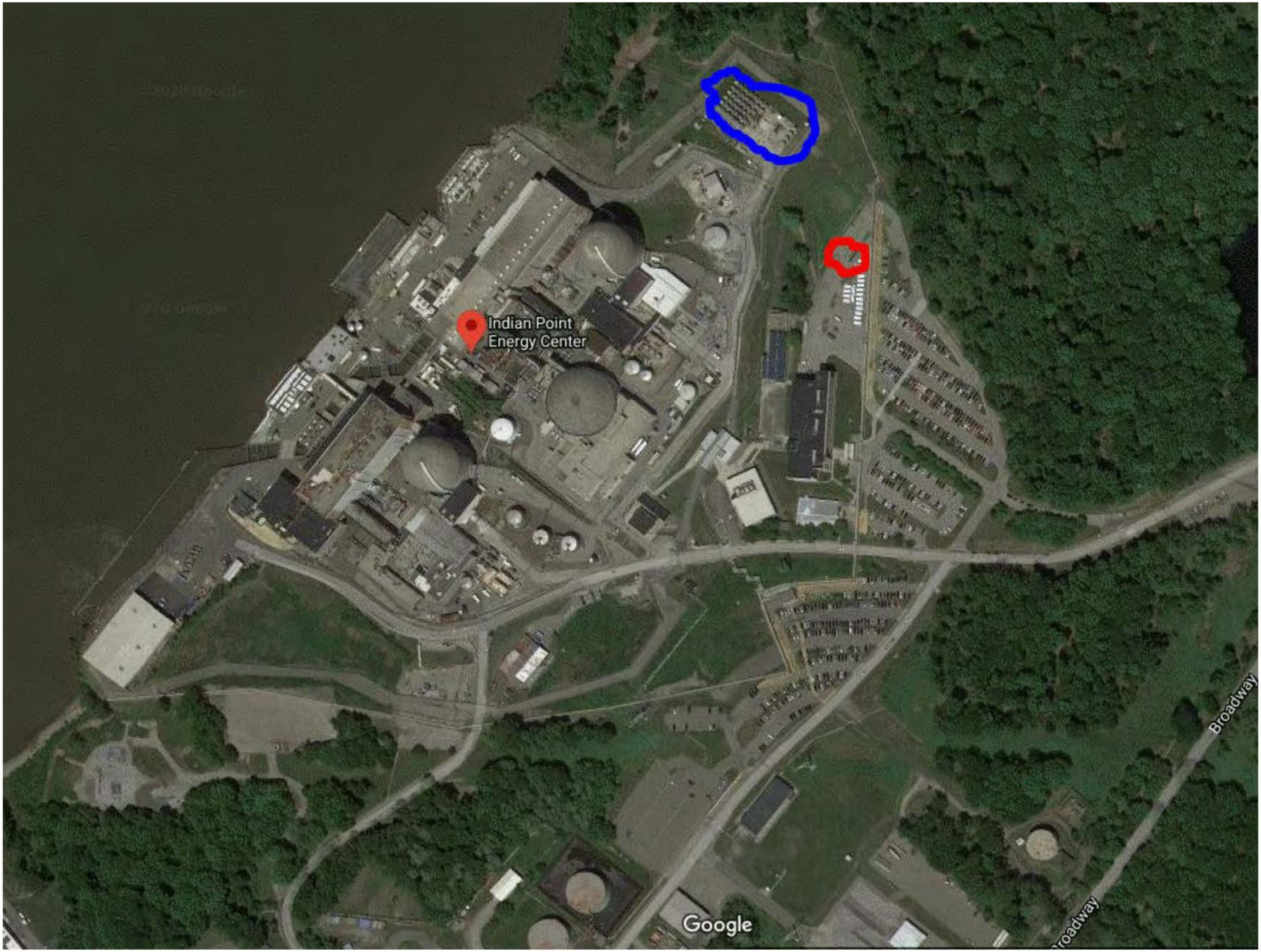
NUREG/CR-3330 states in Table 2-1 that the reinforced safety related structure would last 5 hours with an incident heat flux of 50 kW/m2 applied. This is based on the criterion 1 which is 'Temperature at the first rebar location does not exceed 177°C (350°F)'. Since the first rebar location does not exceed this temperature, the interior temperature does not exceed this value either.

References

[A.1] U.S. Nuclear Regulatory Commission, NUREG/CR-3330, "Vulnerability of Nuclear Power Plant Structures to Large External Fires", Washington, DC, August 1983.

[A.2] Rao Tammara, US Nuclear Regulatory Commission, "Safety Review and Confirmatory Analysis, Entergy's 10 50.59 Safety Evaluation, Algonquin Incremental Market (AIM) Project, Indian Point Energy Center (IPEC)," October 16, 2014.


Shafer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Energy Center
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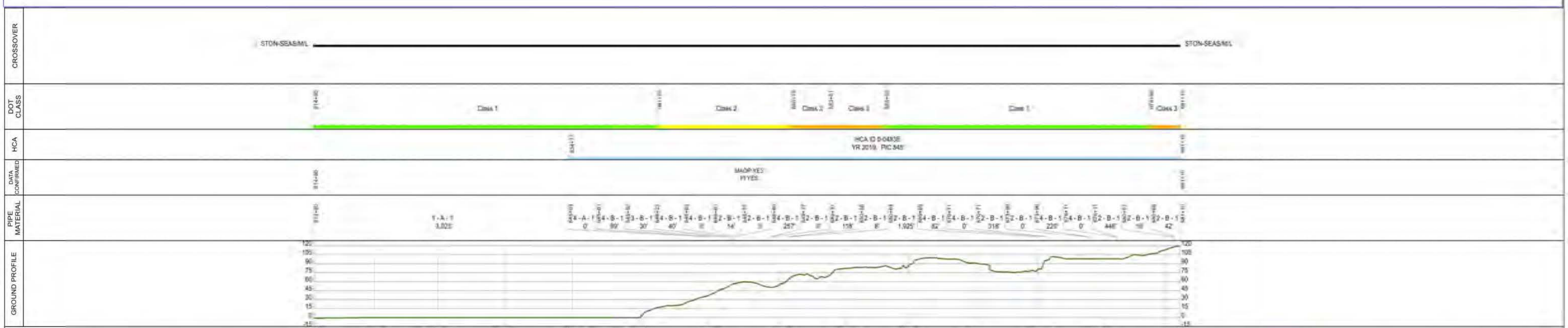


VALVE					
ID	TYPE	CONNECT	RATING	CWO	IN-SERVICE

VALVE OPERATOR			
ID	TYPE	MANUFACTURER	S/N

PIPE MATERIAL INDEX

INDEX	OD	WT	GRADE	IN SERVICE	LW SEAM	MFR
1	40	[illegible]	API-5LX-70	01/07/2017	DSAW	Berg
2	40	[illegible]	API-5LX-70	01/07/2017	DSAW	Berg
3	40	[illegible]	API-5LX-70	01/07/2017	DSAW	Berg
4	40	[illegible]	API-5LX-70	01/07/2017	DSAW	[illegible]

PIPE COATING MATERIAL

INDEX	TYPE
A	ARO
B	Fusion Bonded Epoxy

MOP

INDEX	CURRENT MOP
1	[illegible]

LEGEND

ENBRIDGE

STON-SEAS M/L

SEGMENT LINE ID

004

SHEET ID

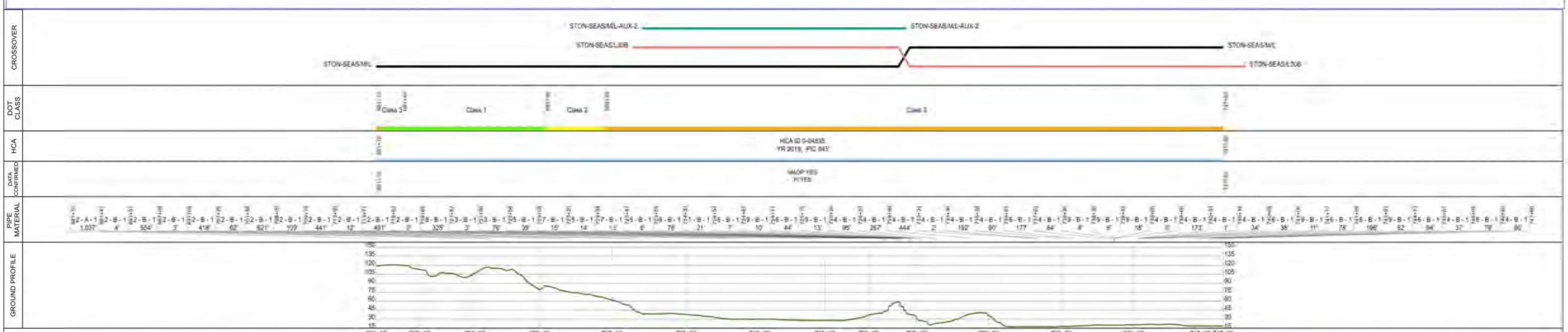
300 150 0 300 600 900

GRAPHIC SCALE - FEET

OPERATIONS ALIGNMENT SHEET

GENERATION DATE: [illegible]

(b)(3) 16 U.S.C. §



VALVE					
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143-3	Ball	[illegible]	[illegible]	[illegible]	[illegible]

VALVE OPERATOR			
ID	TYPE	MANUFACTURER	S/N
143-3	[illegible]		

PIPE MATERIAL INDEX						
INDEX	OD	WT	GRADE	IN SERVICE	LW SEAM	MFR
1	42	0.625	API-5LX-70	01/07/2017	DSAW	Bend Tec
2	42	0.72	API-5LX-70	01/07/2017	DSAW	Berg
3	42	0.75	API-5LX-70	01/07/2017	DSAW	Berg
4	42	1.61	API-5LX-70	01/07/2017	DSAW	Berg
5	42	0.626	API-5LX-70	01/07/2017	DSAW	ILVA
6	42	0.626	API-5LX-70	01/07/2017	DSAW	ILVA
7	42	0.626	API-5LX-70	01/07/2017	DSAW	TATA
8	42	0.75	API-5LX-70	01/07/2017	DSAW	TATA
9	42	0.626	API-5LX-70	01/07/2017	DSAW	TATA

PIPE COATING MATERIAL	
INDEX	TYPE
A	ARO
B	Fusion Bonded Epoxy
C	Rockshield

MOP	
INDEX	CURRENT MOP
1	[illegible]

LEGEND

DATA DISCLAIMER:

ENBRIDGE

GRAPHIC SCALE - FEET

300 150 0 300 600 900

STON-SEAS M/L

SEGMENT LINE ID

005

SHEET ID

OPERATIONS ALIGNMENT SHEET

GENERATION DATE: [illegible]

From:	Sanborn, Scott Edward
To:	Dennis, Suzanne; Luketa, Anay
Cc:	Mohmand, Jamal Ahmed; LaFleur, Chris
Subject:	[External_Sender] RE: [EXTERNAL] FYI: Indian Point report public
Date:	Wednesday, April 15, 2020 11:49:45 AM

Hi Suzanne,

Thank you very much for sending out these links - I've been checking ADAMS almost every day to see what would come out of this work. A lot of effort went into this in a very short period of time and the Team Report reflects all this hard work. Also, I appreciate your flexibility to honor our requests to clearly communication our contributions to the Team Report and I think this has turned out well.

Regarding follow-up actions, we have spent nearly all of our funds completing the memo and reviewing the Team Report. We would need additional funding to perform more work. If you have an idea of what kind of support you need at this point, please let Anay and myself know and we can estimate the cost. We have the Task Order POP extension in place so getting additional funding placed on the Task Order is quick but not immediate.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 15, 2020 9:04 AM
To: Sanborn, Scott Edward <sesanbo@sandia.gov>; Luketa, Anay <aluketa@sandia.gov>; Mohmand, Jamal Ahmed <jamohma@sandia.gov>; LaFleur, Chris <aclafle@sandia.gov>
Subject: [EXTERNAL] FYI: Indian Point report public

Good morning,

Thanks again for all of your help. The evaluation team's report, as well as the transmittal memo to the NRC Commission are now publicly available. The two external transcripts below should be replicated momentarily. There are two styles of links to our public documents and one sometimes works before the other—both are included below to be safe.

EDO Transmittal Memo to Commission:

- https://www.nrc.gov/docs/ML2009/ML20099F775.pdf
- https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML20099F775

Team Report:

- https://www.nrc.gov/docs/ML2010/ML20100F635.pdf
- https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?

AccessionNumber=ML20100F635

Interview Transcripts:

- Rick Kuprewicz:
  - https://www.nrc.gov/docs/ML2008/ML20087M164.pdf
  - https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML20087M164
- Paul Blanch:
  - https://www.nrc.gov/docs/ML2008/ML20087M178.pdf
  - https://adamswebsearch2.nrc.gov/webSearch2/main.jsp?AccessionNumber=ML20087M178

We will continue to coordinate with you, as needed, on our follow-up actions.

Suzanne

From:	Sanborn, Scott Edward
To:	Dennis, Suzanne
Cc:	Mohmand, Jamal Ahmed; Luketa, Anay; LaFleur, Chris
Subject:	[External_Sender] RE: RE: RE: [EXTERNAL] FOR REVIEW: draft team report (by 4/1?)
Date:	Thursday, April 02, 2020 11:31:46 AM

Thank you Suzanne.

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Thursday, April 2, 2020 9:10 AM
To: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: RE: RE: RE: [EXTERNAL] FOR REVIEW: draft team report (by 4/1?)

Hey Scott,

Just FYI – we removed all names from the front page and separated out the external bios with details on your contribution (i.e., Appendix B and insights on fire risk and pipelines).

Suzanne

From: Sanborn, Scott Edward <sesanbo@sandia.gov>
Sent: Wednesday, April 01, 2020 5:23 PM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: [External_Sender] RE: RE: [EXTERNAL] FOR REVIEW: draft team report (by 4/1?)

Hi Suzanne,

After checking with the team we do need our names removed from the front page of the document. The other changes look good.

Please call me (b)(6) if you have concerns or would like to discuss more.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 1, 2020 1:33 PM
To: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: RE: RE: [EXTERNAL] FOR REVIEW: draft team report (by 4/1?)

Hi Scott,

Here's what we have right now:

NRC Participants:

- David Skeen, Office of International Programs (Team Lead)
- Theresa Clark, Office of Nuclear Material Safety and Safeguards (Deputy Team Lead)
- Dr. Yueh-Li (Renee) Li, Office of Nuclear Reactor Regulation
- Suzanne Dennis, Office of Nuclear Regulatory Research
- Brian Harris, Esq., Office of the General Counsel

External Support:

- Steve Nanney, U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration
- Dr. Chris LaFleur, Sandia National Laboratories
- Dr. Anay Luketa, Sandia National Laboratories
- Jamal Mahmand, Sandia National Laboratories

And then later in Section 1.3:

The NRC publicly released the team's evaluation plan on March 9, 2020, including team membership.[i] The team was led by David Skeen (Deputy Director, Office of International Programs) and Theresa Clark (Deputy Director; Division of Rulemaking, Environmental, and Financial Support; Office of Nuclear Material Safety and Safeguards). NRC members were independent of prior reviews in this area. The team included experts in NRC engineering reviews and risk analysis. The team also obtained insights from external experts independent of the NRC's prior activities on this subject. A pipeline safety analysis expert from the Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) independently reviewed the NRC and Entergy safety analyses. In addition, the NRC contracted for experienced researchers at Sandia National Laboratories (SNL) to provide expertise on natural gas modeling and fire risk; the results of SNL's efforts are presented in Appendix B. Biographies of the contributors, both NRC staff and those who provided external support, are included in Appendix F to this report.

From: Sanborn, Scott Edward <sesanbo@sandia.gov>
Sent: Wednesday, April 01, 2020 11:29 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Cc: Luketa, Anay <aluketa@sandia.gov>; Mohmand, Jamal Ahmed <jamohma@sandia.gov>; LaFleur, Chris <aclafle@sandia.gov>
Subject: [External_Sender] RE: [EXTERNAL] FOR REVIEW: draft team report (by 4/1?)

Hi Suzanne,

The way this report is written it makes it seem like Sandia contributed to the entire report. It needs to be more clear that Sandia only contributed to the Appendix. To protect our technical integrity I'm

requesting the following changes:

- Please remove our names from the Principal Contributors page;
- Please modify this sentence in section 1.3 with the addition in red "In addition, the NRC contracted for experienced researchers at Sandia National Laboratories to provide expertise on natural gas modeling and fire risk; their work is documented in Appendix B.
- Please remove our bios from the bio section, we can put those into our appendix.

The report needs to be clear that we did not contribute to the entire report, because we did not.

Anay and Jamal will have specific review comments.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Tuesday, March 31, 2020 2:20 PM
To: Luketa, Anay <aluketa@sandia.gov>; Mohmand, Jamal Ahmed <jamohma@sandia.gov>; LaFleur, Chris <aclafle@sandia.gov>; Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: [EXTERNAL] FOR REVIEW: draft team report (by 4/1?)

Hi SNL team,

As promised, attached is a working draft of the team's report. There are a few areas outstanding (including a couple things you are working on) as noted in comments in the margin. We will be finalizing later this week, we hope.

Could you please review and give us any comments/edits as soon as you can? We would like them by the end of the day on April 1 or mid-day on April 2, if at all possible. We can discuss on the phone any time you like.

The report is quite long, so if your time is short I would recommend a detailed review of Section 2 where pipeline experience is heavily referenced, and a less detailed review in other areas where NRC processes are the focus.

Thanks again for all of your continuing help. You have been a tremendous support to us.

Suzanne

[i] Dated March 9, 2020; ADAMS Accession No. ML20069A759

Note: ML20069A759 is publicly available in ADAMS.

From:	Sanborn, Scott Edward
To:	Dennis, Suzanne
Cc:	Luketa, Anay; Mohmand, Jamal Ahmed
Subject:	[External_Sender] RE: RE: [EXTERNAL] RE: SNL memo
Date:	Thursday, April 02, 2020 9:45:49 AM
Attachments:	NRC review memo Final - SAND2020-3822 O.docx NRC review memo Final - SAND2020-3822 O.pdf

Hi Suzanne,

Attached is the memo with the SAND number in Word and pdf format.

Thanks,
Scott

From: Sanborn, Scott Edward
Sent: Wednesday, April 1, 2020 9:36 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: RE: RE: [EXTERNAL] RE: SNL memo

Hi Suzanne,

No problem with the conversion but I need to get the SAND number assigned through Sandia's R&A process (it' in the queue now). I can send you the pdf at that point.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 1, 2020 9:27 AM
To: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: RE: RE: [EXTERNAL] RE: SNL memo

Hi Scott,

I'm going to convert this to a PDF to make it easier to merge into our report...just wanted to make sure there wouldn't be any issues with that.

Suzanne

From: Sanborn, Scott Edward <sesanbo@sandia.gov>
Sent: Wednesday, April 01, 2020 10:15 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Cc: Luketa, Anay <aluketa@sandia.gov>; Mohmand, Jamal Ahmed <jamohma@sandia.gov>
Subject: [External_Sender] RE: [EXTERNAL] RE: SNL memo

Suzanne,

Thanks. Attached is the version, with the editorial changes made based on NRC's comments/feedback, in our R&A system to get a SAND number. If you have any more comments/feedback please let us know as soon as possible.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 1, 2020 7:32 AM
To: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: [EXTERNAL] RE: SNL memo

That sounds good!

From: Sanborn, Scott Edward <sesanbo@sandia.gov>
Sent: Wednesday, April 01, 2020 9:31 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: [External_Sender] SNL memo

Hi Suzanne,

Do you see any reason why the SNL memo should remain OUO? Jamal has made that change w.r.t. distance to be "Buildings that house Emergency Diesel Generators (EDGs) are approximately 700 meters from the pipeline". At present we are ready to mark the revised version to be unlimited release.

Thanks,

Scott

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Email: aluketa@sandia.gov

Anay Luketa
Principal Member of Technical Staff

March 31, 2020

To: Suzanne Dennis
U.S. Nuclear Regulatory Commission

Subject: ***Review of NRC confirmatory analysis regarding fire and explosion for Algonquin gas transmission line at Indian Point nuclear power plant***

The following provides a review of dispersion and explosion hazard analysis conducted by staff at the U.S. Nuclear Regulatory Commission (NRC) [1] regarding a 42" diameter natural gas pipeline next to the nuclear power plant, Indian Point Energy Center (IPEC) near Buchanan, New York.

This review includes:

- Evaluation of whether the models specified in the US NRC regulatory guide 1.91 [2] were used appropriately.
- Verification of the results using the models used in the analysis.
- Preliminary vapor cloud dispersion simulation using Computation Fluid Dynamics (CFD).
- Summary of review.

The following provides further description of each of these items as well as results and discussion thereof. Note that the request by NRC was urgent and required that Sandia provided the review within three weeks. Because of the limited time available the independent analysis performed by Sandia is considered preliminary for reasons discussed in section 3.

Additionally, appendix A provides a calculation of incident heat flux seen at IPEC safety related reinforced concrete structures. The calculation is based on NUREG/CR-3330 which provides an analysis on the amount of time nuclear safety related concrete structures can withstand various incident heat fluxes [A.1].

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1. Evaluation of the appropriate use of models:

a. Model Description

As specified in the US NRC regulatory guidelines 1.91, the NRC analysis uses the recommended ideal blast wave TNT equivalency method to determine the blast overpressure from a vapor cloud explosion. This method is described in a guideline document by Factory Mutual (FM) [3] cited in the NRC regulatory guidelines 1.91. The Factory Mutual document provides yield factors (or efficiency numbers) and heat of combustion values required as inputs into the model and discussion regarding the appropriate use and limitations of the model.

The equations used in the model are the following.

$$E = \alpha \Delta H_c m_f \quad (1)$$

$$W_{TNT} = \frac{E}{H_{detonation\,TNT}} \quad (2)$$

$$R_{min} = Z * W_{TNT}{}^{1/3} \quad (3)$$

where

E = blast wave energy
α = yield or efficiency number
ΔH_c = theoretical net heat of combustion
m_f = mass of vapor released
$H_{detonation\ TNT}$ = heat of detonation of TNT
R_{min} = distance from explosion where peak positive overpressure equals 1.0 psi (6.9 kPa)
Z = scaled distance (45 ft/lb$^{1/3}$ or 18 m/kg$^{1/3}$)
W_{TNT} = TNT equivalent mass

b. Model inputs

<u>Mass of vapor released</u>

The NRC analysis considered the release from one side of the rupture and uses ALOHA to determine the mass of the vapor cloud. The scenario evaluated is of a full-bore above-ground release. Such a scenario was realized in the natural gas pipeline accident in Carlsbad, New Mexico as described in the National Transportation Safety Board report [4] in which a 49-ft section of corroded pipe was blown off through the soil leaving a large crater.

The pipeline is assumed to have manual closure of the isolation valves within 3 minutes where the distance between isolation valves is 3 miles. Thus, for a release from one pipe end rather that two, both isolation valves would have to be closed and the release would occur at one end of the 3-mile section or next to one of the isolation valves. Based on this distance, the pipe length was entered as 3 miles in ALOHA and the closed option selected which means the pipe is closed off at one end. ALOHA uses equations for choked flow assuming an ideal gas in which the flow rate

decreases over time due to the pressure drop and closed end of the pipe. The analysis considers a release over 1 minute using the maximum sustained average flow rate. An explosion calculation was also performed by NRC using ALOHA which calculates overpressure distances using the Baker-Strehlow-Tang method which incorporates general factors for obstacles that are not site specific.

The NRC guidelines 1.91 cite reference [5] for methods of estimating the mass of the vapor cloud. The reference provides a range of possible models to use from integral to CFD-based models and ALOHA is among those listed which is considered an integral-based model. ALOHA is not capable of modeling topography and geometry that reflects congestion at a particular site. It also does not have models for supercritical releases which will be discussed in section 3. The NRC guidelines does state:

> *"For releases of vapor clouds at offsite location or pipelines, plume modeling based on site topography and meteorological conditions should be evaluated. The atmospheric transport of released vapor clouds should be calculated using dispersion or diffusion models that permit temporal as well as spatial variations"*

Since ALOHA cannot model topography and temporal variations, it is not appropriate for use if the above guideline is to be followed. It also does not model supercritical fluids which require models for real gases since it assumes the ideal gas law.

Yield factor

The parameter, α, in equation 1 is the yield factor or efficiency number which indicates the fraction of available combustion energy participating in blast wave generation.

As stated in the FM guideline document,

> *"It cannot be overemphasized that assigning of an explosion efficiency number to a potential gas release incident is, with current technology, and entirely arbitrary exercise"*

This is a key point because as discussed in the FM guideline a release in a congested area such as dense vegetation, vehicles, and buildings can result in significantly higher overpressures. The congestion will result in a range of yield values which is not accounted for by the TNT equivalency method. It is also noted that the method represents the explosion as a point source which is not representative of the pressure signature of vapor cloud explosions which tend to have greater pressures in the far field and of longer duration than predicted from the model. Due to the point-source representation of the model, overpressures are overpredicted in the near field and underpredicted in the far field and are of shorter duration than vapor cloud explosions [3]. Lower overpressures of longer duration have the potential to be more damaging to structures than higher overpressures of short duration. It is further noted in the FM guideline that the method despite its drawbacks is often used to provide an approximate evaluation and that when very specific design basis building siting is required the method is inappropriate.

Related to the discussion provided in the FM guideline is the following statement provided in the NRC guideline 1.91:

> *"A detailed analysis of possible accident scenarios for particular sites, including consideration of the actual amount of potentially explosive material, potential release, site topography, and prevailing meteorological conditions, should be used to justify a value for the yield. However, for establishing safe standoff distances independent of site conditions, the use of a conservative estimate for the yield is prudent"*

The NRC guidelines 1.91 refers to the FM guideline for recommendations regarding the yield factor. The FM guideline recommends a yield factor of 0.05 for a Class I material such as natural gas based upon historical evidence which has indicated yields of 0.01 to 0.05 for typical hydrocarbons, though yields as high as 50% have been recorded and even very low estimated yields (~0.001) have caused extensive damage [3]. Thus, it's difficult to determine what value is considered conservative.

The NRC analysis used the recommended yield factor of 0.05 but did not account for site-specific conditions such as congestion and surrounding topography. A key question is whether the site surrounding the pipeline can result in much higher yields than 0.05 given the congestion as shown in Figure 1. The pipeline shown in Figure 1 is between IPEC and Buchanan or approximately 1600 ft from IPEC. It is evident that the surrounding area is highly congested with vegetation, structures, and vehicles indicating that more detailed analysis would be warranted based on recommendations in both guidelines. The FM guidelines recommends the TNO Multi-Energy Model for congested sites and is discussed in that document. The main assumption of the NRC analysis is that the since the vapor cloud is buoyant will rise and rapidly disperse above the surrounding vegetation and structures. This validity of the assumption will be discussed in section 3.

Figure 1: Indian Point Energy Center and Buchanan, NY.

Heat of Combustion

The NRC guidelines 1.91 refers to either NUREG-1805 [6] or the FM guidelines for the heat of combustion, though the FM guidelines does not specify the value for methane or natural gas. In ref. [6] the heat of combustion for liquefied natural gas composed mostly of methane is provided as 50,000 kJ/kg. The NRC analysis used a value of 50,030 kJ/kg for methane. This results in a higher blast wave energy, though of an insignificant amount (0.06%) compared to using a value of 50,000 kJ/kg.

Heat of Detonation

In equation (2) the denominator, that is the heat of detonation, is given as 4420 kJ/kg (1900 BTU/lb_m) in the NRC guidelines 1.91 where reference [7] is cited as the source for the value. The reference [7] source provides a value of 4500 kJ/kg (1935 BTU/lb_m) rather than 4420 kJ/kg. To check the validity of these values, a resource by a recognized expert in the field of explosives [8] was used. Reference [8] states that the heat of detonation can be determined using three approaches, two theoretical approaches and experimentally. From a theoretical approach using the thermodynamic work function the value is 4853 kJ/kg and that using the hydrodynamics work function the value is 4519 kJ/kg. Experiment has indicated a value of 4686 kJ/kg. Thus, among these values the most conservative is 4519 kJ/kg which is above 4500 kJ/kg indicating that 4500 kJ/kg is a reasonable value to use. It is uncertain as to where the value 4420 kJ/kg was obtained in the NRC guidelines.

Duration of release

The amount of mass of vapor used in equation 1 is determined by the duration of the release. Based upon discussion via teleconference with the author of the NRC analysis, a key assumption of the

NRC analysis is that the vapor cloud will be buoyant and disperse within the first minute and thus only considered the mass released over 1 minute. The full release duration is never considered whether the release is 3 minutes or 60 minutes thereby making the time at which the isolation valves are closed irrelevant. There is no evidence or justification presented for this assumption. Note that it is recommended in the FM guideline document that for a pipeline release it should be assumed that the pipeline is completely severed, and the duration of discharge should be 10 minutes flowing from both ends of the severed pipe even if automatic or manual block valves are present. An exception to this recommendation is not made for methane in the FM guideline.

2. Verification of the results

a. *Explosion*

The results of the explosion calculations by the NRC analysis and verification by Sandia National Laboratories (SNL) are provided in Table 1. Note that the pipeline pressure is 850 psig and in ALOHA the absolute pressure should be entered which would be 864 psia. Based on this verification, the NRC analysis appeared to have used 850 psia which does provide a flow rate of 256,000 lbs/in. If 864 psia is used, the average flow rate would increase to 261,000 lbs/min and the resulting distance to an overpressure of 1 psi is 2365 ft which is not a significant different than the distance of 2351 ft obtained from the NRC analysis. Note that in Table 1 the distance verified by Sandia is using a pressure of 850 psia to determine if the NRC results could be reproduced.

The NRC analysis used the maximum average flow rate obtained from ALOHA from a closed-end 3-mile pipeline, considering a release for 1 minute before the cloud is ignited. The NRC analysis used both the TNT equivalency method and ALOHA to calculate the blast overpressure distance to 1 psi. The delay time that was used for the ALOHA calculation for the 1-minute release was not specified in the NRC analysis. SNL could only reproduce the results approximately if a delay time of 8 minutes is specified providing a distance of 3057 ft. If the delay time is not specified, but is chosen by ALOHA the distance is much greater, providing 9504 ft. The distance calculated by NRC using ALOHA for this case was discounted as mentioned in the report that vapor dispersion in a congested area is not credible because the methane cloud is buoyant and will quickly rise and disperse rapidly.

The NRC analysis also considered a 60-minute release using ALOHA to calculate the maximum average sustained flow rate of 311,000 lbs/min. The mass released over the first minute was considered and not the total mass released over 60 minutes. The NRC analysis assumes that since the cloud will be buoyant it will disperse within 1 minute and thus an explosion will occur during the first minute independent of release duration and thus uses a mass of 311,000 lbs for the TNT equivalency calculation. If the cloud is not immediately buoyant, then for a 60-minute release using the total mass calculated by ALOHA the result in 8872 ft or 1.7 miles. The assumption of whether the vapor cloud is immediately buoyant or if it behaves as a dense gas which will greatly extend the time before the cloud is diluted below the lower flammability limit is discussed in section 3a.

Table 1: Results of explosion calculation for NRC analysis and SNL verification

Scenario	Pipe distance	Mass released	Distance to 1 psi blast overpressure	Results of verification by SNL using same methods
Explosion from one side of full-bore rupture release	3 miles (distance between isolation valves)	256,000 lbs for 1 minute using 'closed' end of pipe option in ALOHA	2351 ft (TNT) 3054 ft (ALOHA, with congestion)	2349 ft (TNT) 9504 ft (ALOHA, with congestion)
Explosion from one side of full-bore rupture release	3 miles (distance between isolation valves)	Release over 60 minutes using 'infinite source' option in ALOHA. • 311,000 lbs/min maximum average sustained flow rate • Total amount released 13,785,499 lbs	2509 ft (TNT - mass released for first minute)	2507 ft (TNT - mass released for first minute) 8872 ft (TNT - total mass released)

3. Computational fluid dynamics simulations

A preliminary simulation was performed to determine the extent of the vapor cloud using two Computation Fluid Dynamics (CFD) codes, namely ANSYS Fluent for supercritical pipe flow and Fire Dynamics Simulator (FDS) for dispersion. The results from the pipe flow simulation is used to provide an approximate boundary condition for the natural gas release in FDS. Two separate simulations were performed because the pipe flow involves very high-speed flow which requires very small timesteps which would greatly increase the dispersion calculation if both the pipe and dispersion flow were coupled in a single simulation. Thus, pertinent values for the pipe flow simulation were assessed several diameters from the pipe exit where velocities are much lower than near the exit. FDS was chosen to perform the dispersion simulation instead of ANSYS Fluent because FDS has been validated for dense-gas dispersion [9], though ANSYS Fluent has the pertinent physics to model dispersion.

It is highly stressed that the simulations are considered preliminary because a simulation study involves validation, evaluation of parameter sensitivity, and evaluation of grid independence to evaluate the level of uncertainty in predictions. Additionally, the accuracy of the real-gas equation of state used has not been evaluated. Other models specifically for natural gas have been recently developed [10] [11] but require extensive effort to implement into ANSYS Fluent which would not allow for this review to be completed in the timeline required. Also due to the limited time available to perform this analysis, the actual topography of the site is not included in the dispersion calculation and the simulation assumes a flat plane.

a. Pipe simulation

The flow of natural gas in the 42" diameter pipe is supercritical at 850 psi for temperatures 200 K and greater shown in Figure 2. Thus, a real-gas equation of state is used rather than the ideal gas equation. The flow is under-expanded choked flow in which the Mach number is 1 at the exit. Specifications provided in Table 2 and the domain shown in Figure 3 were used for the simulation.

Results from this simulation are shown in Figures 4 through 7. Figure 4 shows an axisymmetric contour plot of the Mach number which indicates choked flow. Figure 5, showing an axisymmetric contour plot of velocity, indicates that the velocity at the exit of the pipe is about 375 m/s and that a downstream shock wave occurs which has a velocity of about 970 m/s. Especially significant to this review are the temperature and density contour plots shown in Figure 6 and Figure 7, respectively, since the statement has been made in the NRC analysis that the vapor cloud will immediately become buoyant. The results indicate that the region just before the shock wave would result in condensation of the methane and in regions after the shock would condense water allowing for the cloud to be visible. Note that the simulations did not include multiphase flow but would be required for a detailed analysis.

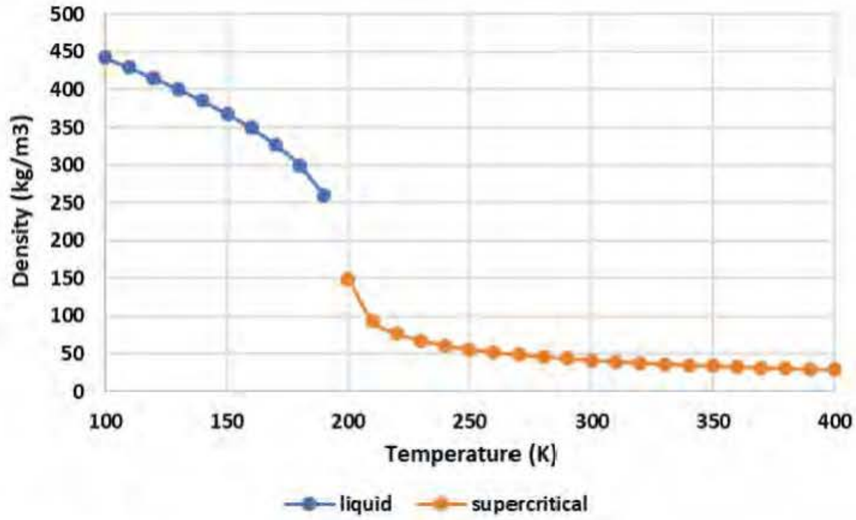

Figure 2: Temperature versus density of methane at 850 psi (https://webbook.nist.gov/chemistry/fluid).

Table 2: Specifications for pipe flow simulation

Specification	Value
Pipe diameter	1.07 m
Pipe length	100 m
Length, height of region beyond the pipe	50 m, 25 m
Fluids	methane, air
Equation of State	Soave-Redlich-Kwong
Inlet temperature	283 (K) (50°F)
Inlet pressure	5.861 (MPa) (850 psi)

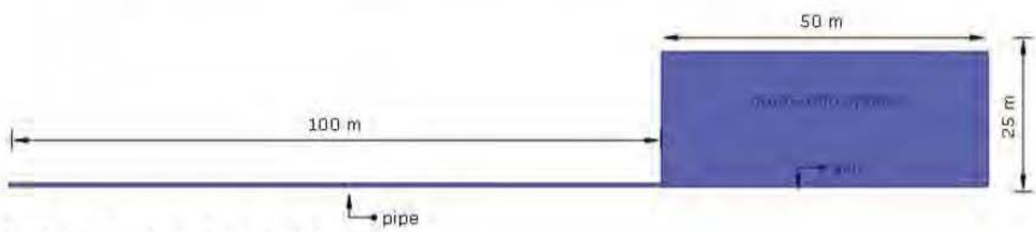

Figure 3: Domain for pipe simulation.

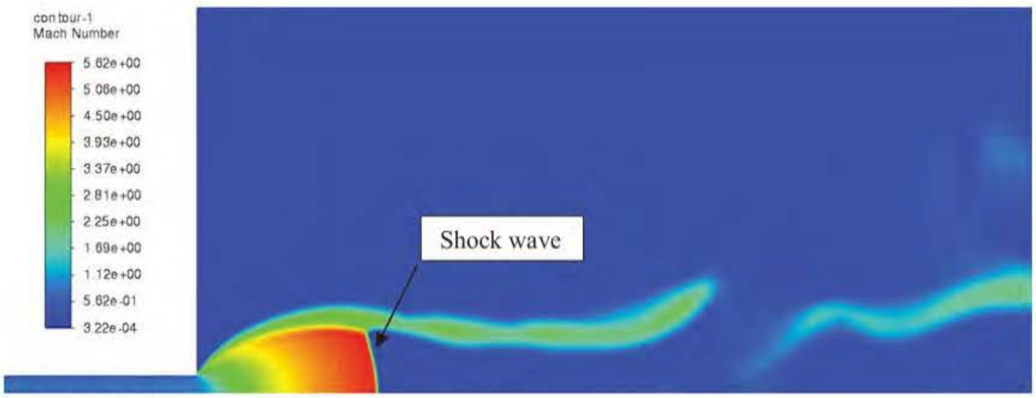

Figure 4: Axisymmetric view of Mach number contours.

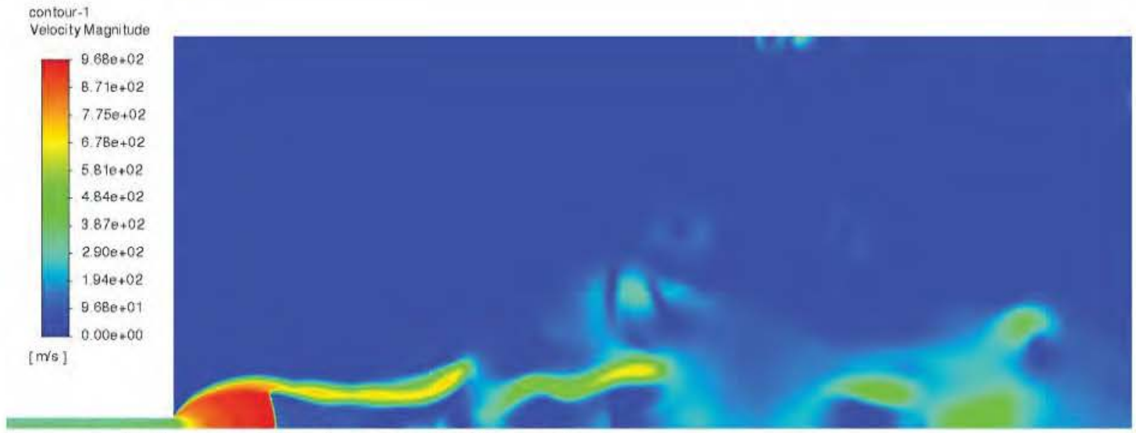

Figure 5: Axisymmetric view of velocity contours.

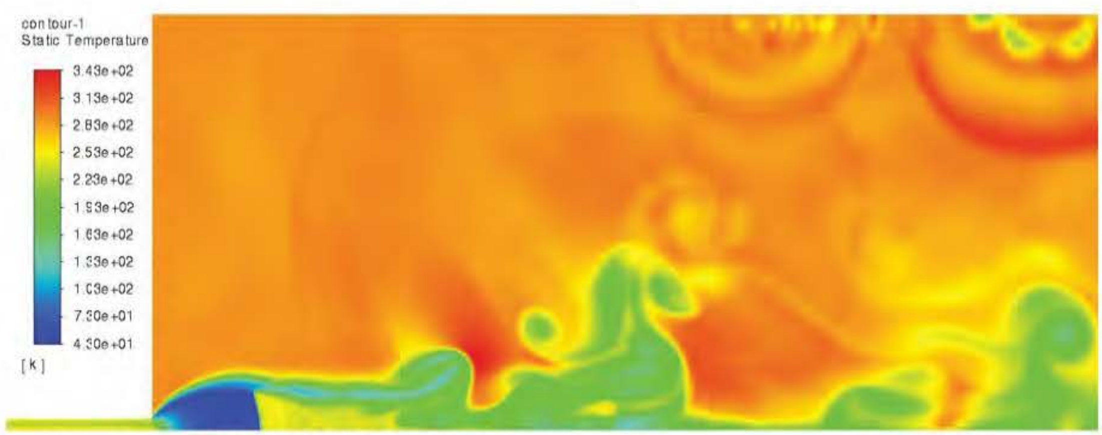

Figure 6: Axisymmetric view of temperature contours.

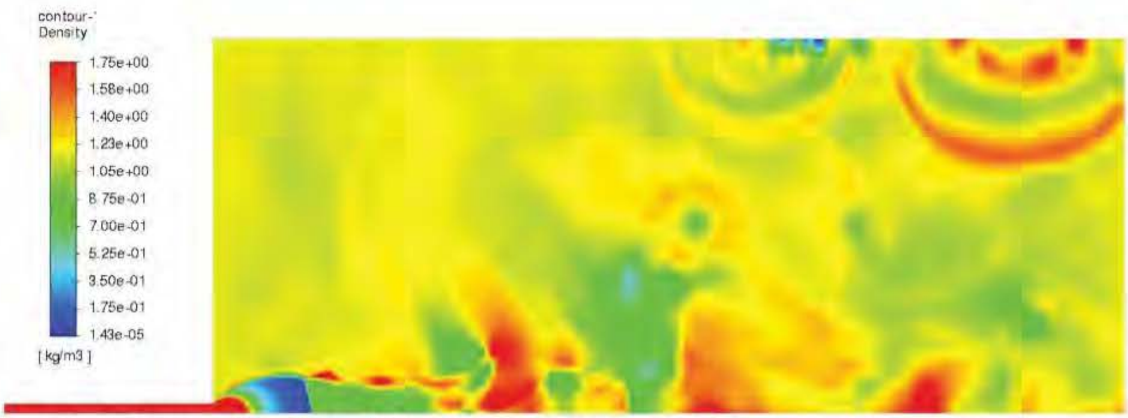

Figure 7: Axisymmetric view of density contours.

Under-expanded compressible flow can produce a series of progressively weaker shock waves that form a diamond pattern. The pattern will not continue indefinitely but will be diffused from viscous effects and will no longer maintain their pattern. The pattern formed will depend on the exit pressure which for this simulation was approximately 350 psi (2.3 MPa or 24 bar). Illustration of variation of patterns is shown in Figure 8 which are simulation results taken from reference [12] of under-expanded methane jets for two different exit pressures, 20 bar (290 psi) and 12 bar (174 psi). Notable is that both cases results in regions of condensation. The pattern of the simulation results presented in Figures 4 through 7 are closest to the exit pressure of 12 bar shown in Figure 8b. Though this should be caveated with the understanding that this is a preliminary simulation and that additional investigation is needed to improve accuracy for the reasons noted previously. For instance, the region beyond the pipe exit uses a stretched mesh in which cell sizes become increasing larger further away from the exit. It was necessary to use a relatively coarse mesh in this region in order to reduce computational run time to meet the project's timeline. Since the flow may not be sufficiently resolved past the initial shock wave, potential subsequent shocks forming the diamond pattern may not be captured. Also, due to the under resolution, the turbulence viscosity was artificially high which resulted in enhanced mixing. It is anticipated more detailed structure similar to reference [12] would be captured as the mesh is refined possibly showing additional regions of condensation.

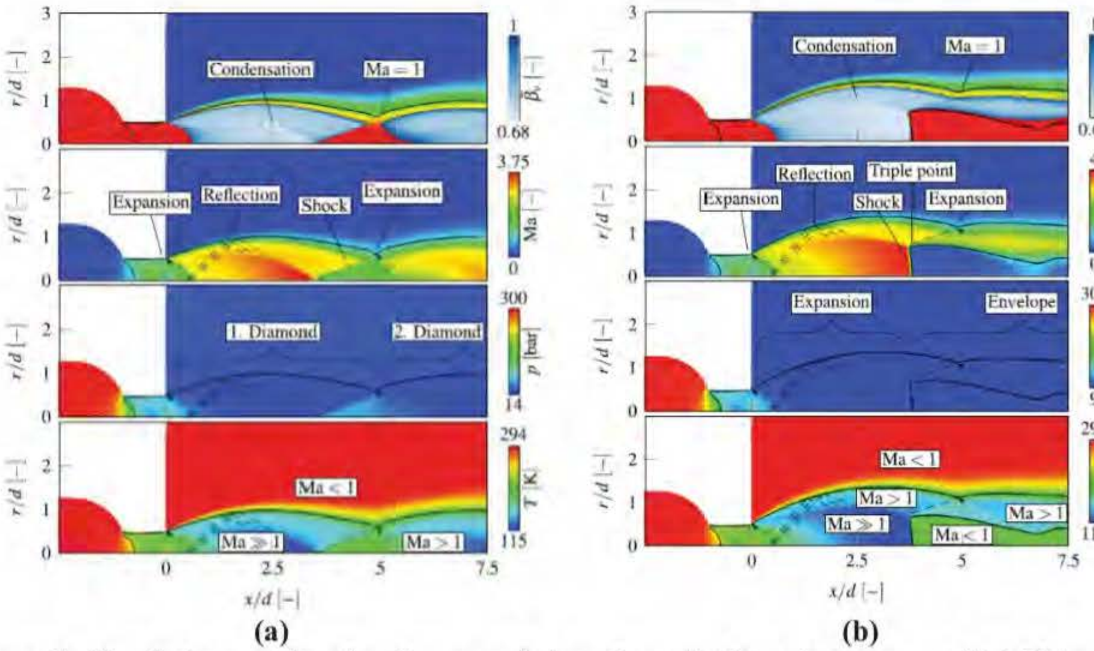

Figure 8: Simulation results of underexpanded methane jet for exit pressure of (a) 20 bar and, (b) 12 bar. Figure taken from Banholzer, M, et al., "Numerical investigation of the flow characteristics of underexpanded methane jets", Phys. Fluids, 2019 [12].

The results from the present simulation and from reference [12] indicate that the vapor cloud would be a dense gas initially and not be immediately buoyant. Furthermore, the NRC analysis provides additional supporting evidence to the above that the issuing gas would be heavier than air. The NRC analysis uses a flow rate of 256,000 lbs/min (1939 kg/s) and a methane density issuing from the pipe exit of 0.67 kg/m^3 which is less dense than air. Given the area of the pipe (0.89 m^2), the resulting exit velocity would be 3,961 m/s for this assumed density which would not be choked flow. To satisfy choked flow with an exit velocity of about 375 m/s, the density would have to be around 6 kg/m^3.

This has significant consequences for explosion hazards since dense gas vapor clouds in stable atmospheric conditions can travel significant distances [13] and will persist much longer than 1 minute. Additionally, the dense vapor cloud would travel through the surrounding vegetation and other infrastructure to provide an environment for a deflagration to detonation transition (DDT). Particularly since the natural gas is not 100% methane but can have up to 5% of other hydrocarbons such as ethane and propane. Small additions of these hydrocarbons can increase the sensitively of the gas to detonation [13].

Thus, it is recommended that the TNT equivalency model not be used but rather use a model that can include the effects of congestion such as the TNO multi-energy method [3]. And, if using ALOHA for explosion hazard assessment it is recommend that the 'congested' option be used. For a 256,000 lbs/min released from one end of the pipe for either 1 minute or 10 minutes using ALOHA with the congestion option, distances to 1 psi overpressure of 1.8 miles and 5 miles are predicted, respectively. As noted previously, ALOHA calculates overpressure distances using

the Baker-Strehlow-Tang method which incorporates general factors for obstacles which are not site-specific and thus isn't considered as accurate as the TNO multi-energy method.

b. Dispersion simulation

The simulation of the vapor cloud dispersion assumes that the safety valves could be shut in 12 minutes, doubling the time provided in the report by the Office of Inspector General of the NRC [14] from an interview with the Enbridge Energy Corporation, owners of Algonquin, which stated that it would take a minimum of 6 minutes to shut the isolation valves. For this preliminary simulation, the same flow rate as used by the NRC analysis of 256,000 lbs/min (1939 kg/s) was assumed for a double-sided full-bore release. This is because the release rate depends on the pipe length and the simulation of the pipe used a length of 100 m rather than a length of 3 miles due to computational run time. For any future investigation, flow rate as a function of pipe length should be evaluated. Note that for the pipeline, given the much greater range of operating pressures above atmospheric, the flow will be in a thermodynamic state to result in a gas density that is heavier than air. Thus, within the potential flow rates arising from the range of operating pressures, the gas will be denser than air. Based on the findings from the pipe simulation, the density of the gas is specified as 1.5 kg/m^3 by evaluating regions beyond the shock wave. Thus, the gas will be heavier than air and will persist and spread much further than if the cloud was lighter than air. Since the CFD code, FDS, used to model the vapor dispersion is designed for low Mach number flows, that is, Mach numbers up to about 0.3 a release velocity of 50 m/s is used which is about Mach 0.15, well below the limits of FDS. To use this velocity and match the mass release rate of (1939 kg/s), the area of the release had to be increased relative to the pipe diameter, that is, from 1.1 m to 6.6 m. Thus, the details of the dispersion will not be representative of the actual pipe near the release but will be representative of the vapor cloud in the far field providing an estimate of the extent of dispersal. The release is also above ground, but it is anticipated that the vapors would fill and eventually overflow a crater formed from a release. The specifications used in the simulation is provided in Table 3.

Table 3: Specifications for dispersion simulation

Specification	Value
Duration of release	12 minutes
Diameter of release	6.6 m
Mass release rate	1939 kg/s (256,000 lbs/min) from two horizontal full-bore releases directed towards each other placed 15 m (50 ft) apart
Fluids	methane, air
Density of methane	1.5 kg/m^3
Atmospheric conditions	Stable (Monin-Obhukov relations), wind speed 1.5 m/s, temperature 293 K
Number of elements	80 M
Element size	0.2 m
Number of processors	168

The computational run time was much longer than typical dispersion simulations because of the relatively high release velocity (50 m/s vs. ~1 m/s). Typically, dispersion simulations will take about 1-2 days to complete depending on the number of elements required. For this dispersion simulation it

took about a day to complete 200 seconds of real time. With an ending time of 1800 seconds, it would take about 9 days to complete. The simulation was terminated unexpectedly from the high-performance compute cluster, possibly due to high demand, at almost 500 seconds of real time and was not restarted in order to meet the project's timeline. At almost 500 seconds the vapor cloud reached the lower flammability limit (LFL – 5% vol.) at a distance of about 950 m (3,100 ft) from the release point. Since the release doesn't terminate until 720 seconds (12 minutes), it is anticipated that the distance would increase if the simulation was continued. Also, even after the release is terminated, the cloud will drift downwind and take several minutes to dissipate resulting in greater distances to the LFL. Given the above, it is anticipated that the distance would extend beyond 1,600 m (5,248 ft) since the cloud is propagating in the downwind direction at a speed of about 100 m/min. Figure 9 through Figure 16 shows a temporal sequence of the development of the vapor cloud from 1-8 minutes by plotting contours of methane volume fractions at the upper flammability limit (UFL – 15% vol.) and LFL . If the cloud reaches an ignition point within the flammability region an explosion can occur. Note that the cloud in the lateral extent is propagating beyond the computational domain indicating that for any future investigation the domain should be increased in the lateral extent.

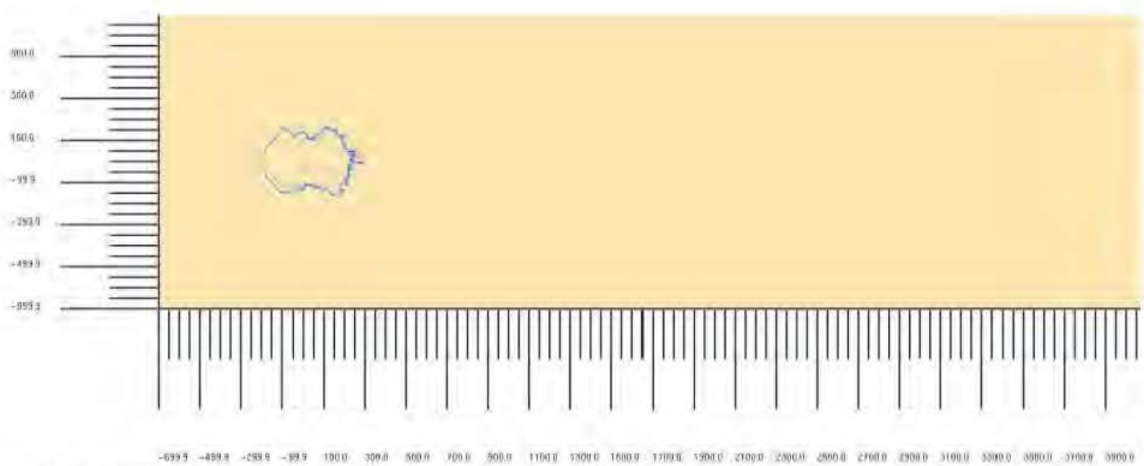

Figure 9: Top-view image of UFL (light blue) and LFL (dark blue) contours 1 minute after release. Distances are in meters.

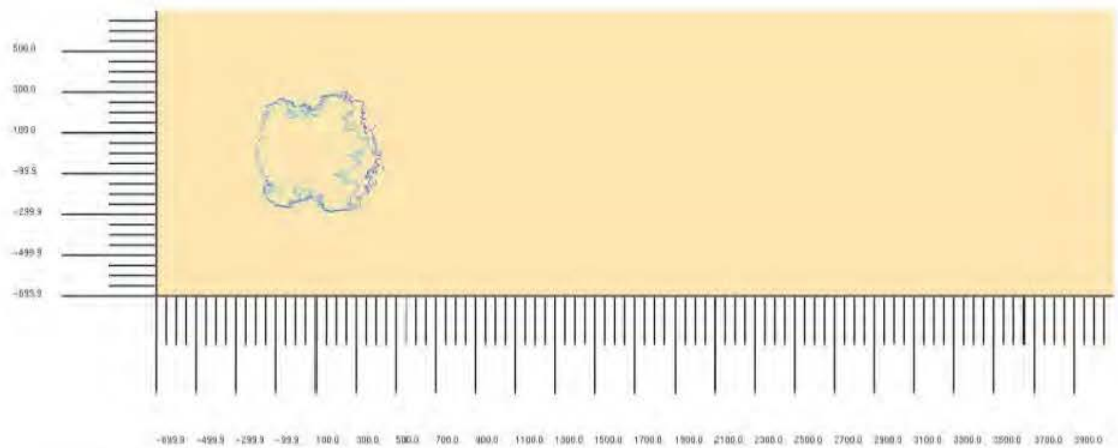

Figure 10: Top-view image of UFL (light blue) and LFL (dark blue) contours 2 minutes after release. Distances are in meters.

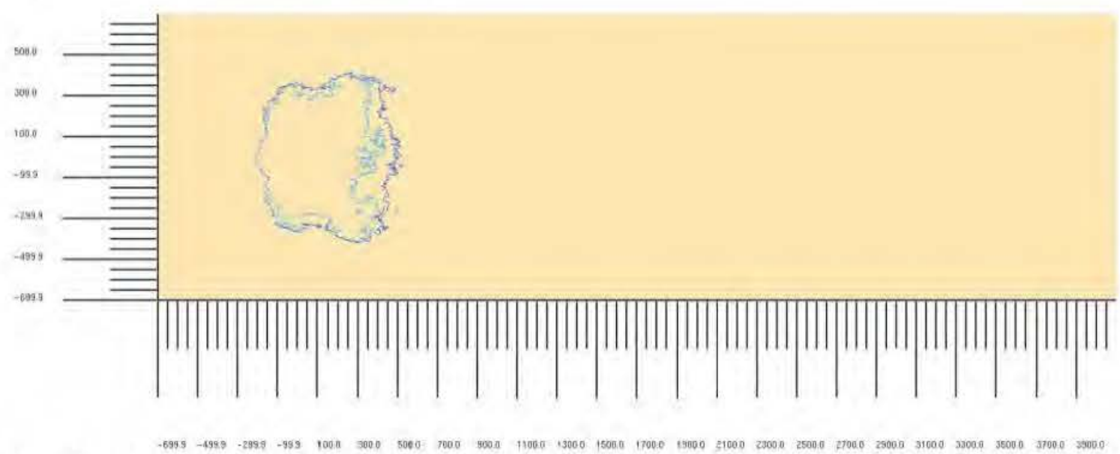

Figure 11: Top-view image of UFL (light blue) and LFL (dark blue) contours 3 minutes after release. Distances are in meters.

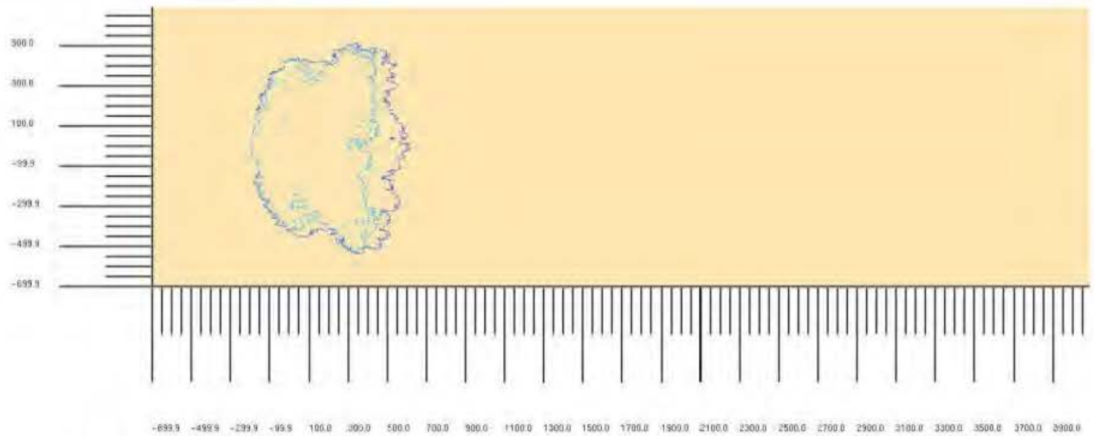

Figure 12: Top-view image of UFL (light blue) and LFL (dark blue) contours 4 minutes after release. Distances are in meters.

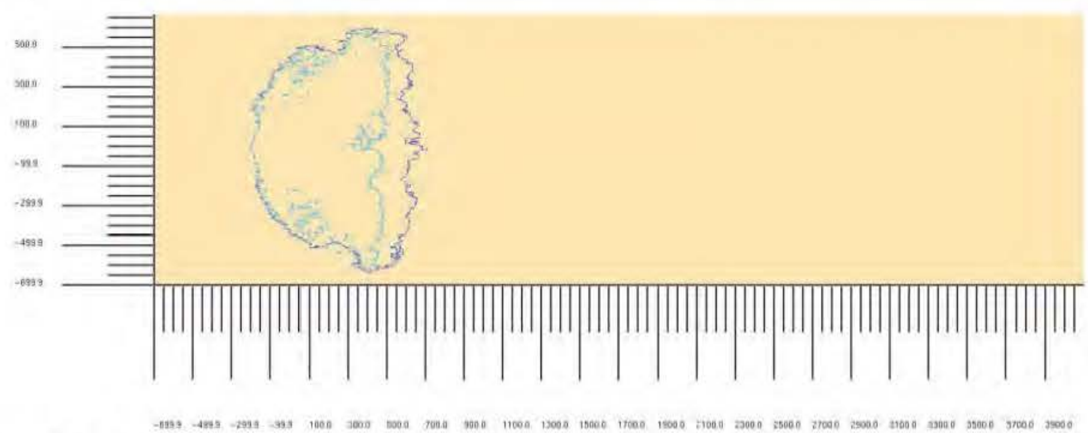

Figure 13: Top-view image of UFL (light blue) and LFL (dark blue) contours 5 minutes after release. Distances are in meters.

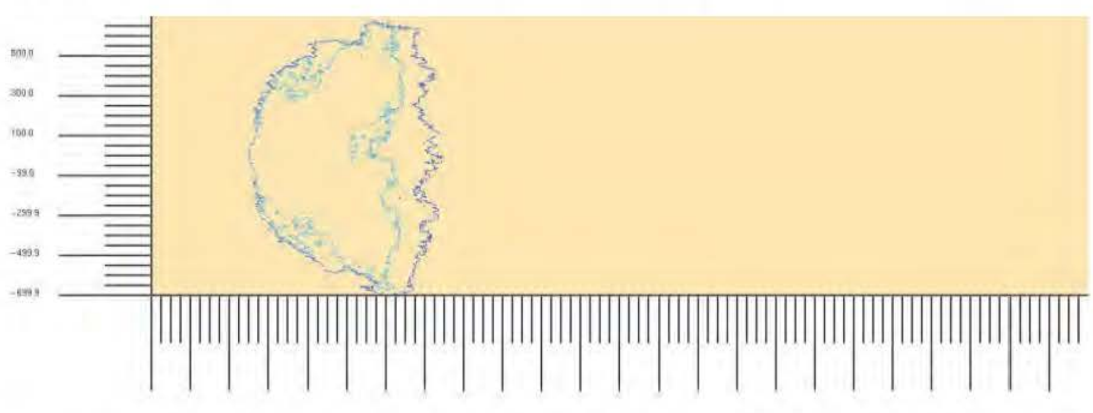

Figure 14: Top-view image of UFL (light blue) and LFL (dark blue) contours 6 minutes after release. Distances are in meters.

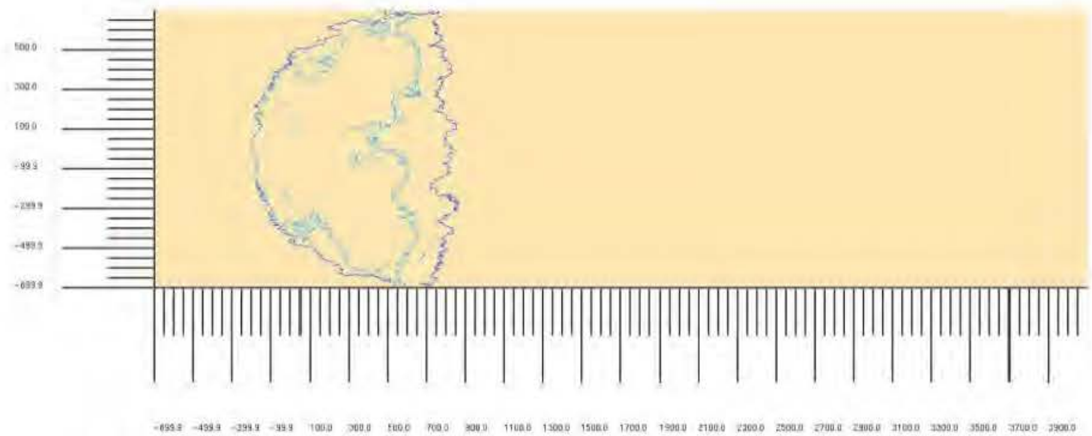

Figure 15: Top-view image of UFL (light blue) and LFL (dark blue) contours 7 minutes after release. Distances are in meters.

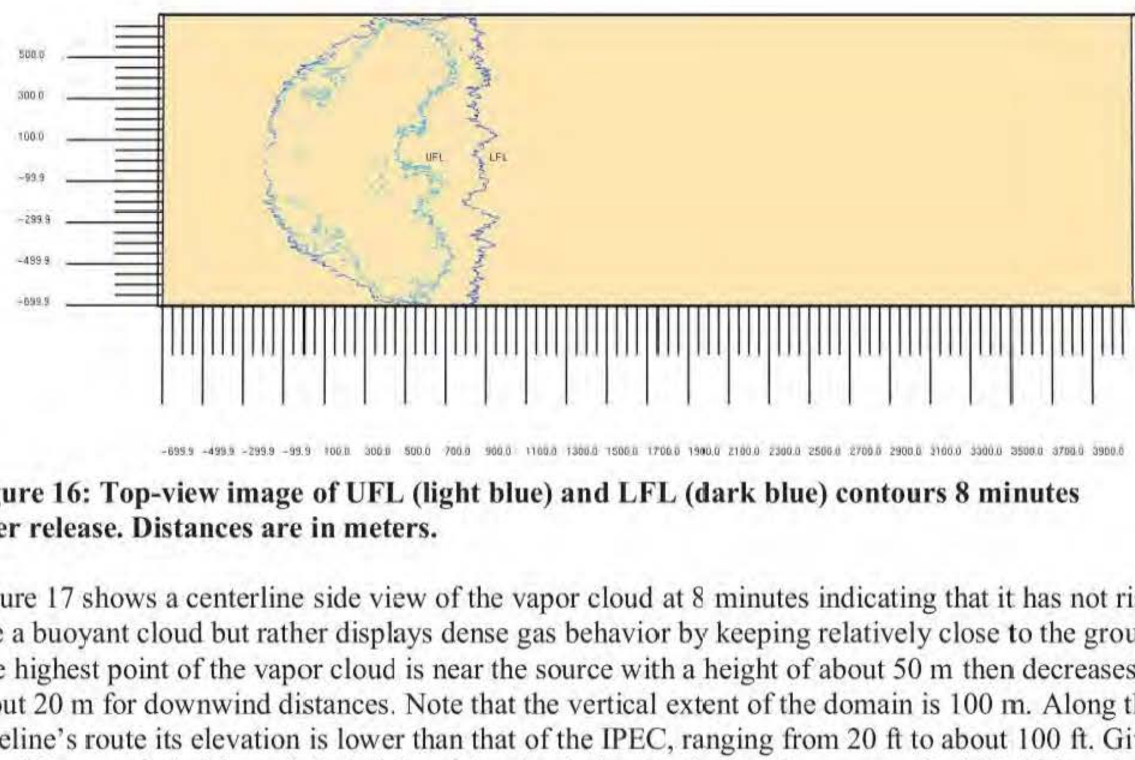

Figure 16: Top-view image of UFL (light blue) and LFL (dark blue) contours 8 minutes after release. Distances are in meters.

Figure 17 shows a centerline side view of the vapor cloud at 8 minutes indicating that it has not risen like a buoyant cloud but rather displays dense gas behavior by keeping relatively close to the ground. The highest point of the vapor cloud is near the source with a height of about 50 m then decreases to about 20 m for downwind distances. Note that the vertical extent of the domain is 100 m. Along the pipeline's route its elevation is lower than that of the IPEC, ranging from 20 ft to about 100 ft. Given this difference in height and the height of the cloud, the cloud can migrate over the hills if the wind direction is towards the IPEC. Since the wind can be in any direction, the dispersion calculation

assumes the wind direction is towards the SOCA.

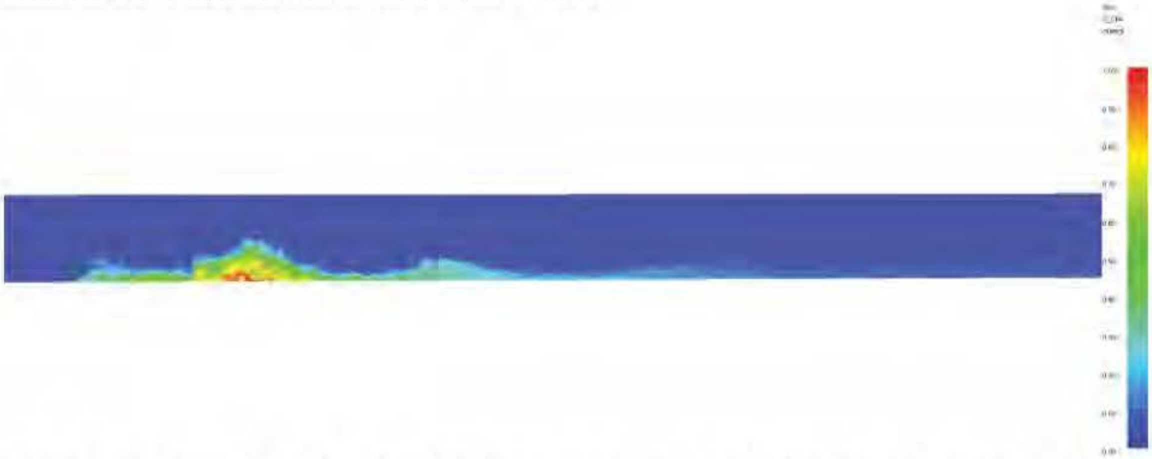

Figure 17: Centerline side view of vapor cloud showing contours of methane volume fraction at 8 minutes.

This dense gas behavior has implications with regards to explosion hazards since the vapor cloud would travel through vegetation and persist for a sufficient amount of time to result in potential ignition which can lead to a deflagration to detonation transition due to the congestion or have overpressures that exceed 1 psi from a deflagration explosion. The vapor cloud region between the flammability limits is roughly 1/3rd the cloud volume and if the cloud encounters an ignition source in congested areas, significant overpressures can result. At approximately 6 to 7 minutes after release the flammability region of the vapor cloud will be either near or begin to engulf the SOCA and can result in an explosion with a high likelihood of exceeding an overpressure of 1 psi at the SOCA if ignited within the flammability region. The furthest point downwind distance within the flammability region is about 950 m (3,100 ft) at 8 minutes which is greater than any distance from the pipeline route to the SOCA (Security Owner Control Area) which varies from about 1580 ft to 2363 ft. At 8 minutes the flammability region would surround the SOCA. The results from this simulation indicate that for this release scenario explosion overpressures of greater than 1 psi at the SOCA would most probably occur given the surrounding congestion. Instances of natural gas pipeline accidents in which the natural gas was not immediately ignited at the release point and indicated that the cloud was not immediately buoyant can be found in references [15] [16].

4. Summary of review

The following are the key findings from this review:

1. Evaluation of models used:
    - Correct heat of detonation value was used;
    - ALOHA does not model supercritical flow and topography which is applicable to this release scenario.
    - TNT equivalency model is inadequate for the release scenario.

2. The major assumptions of the NRC analysis that results in an underprediction of distances to an overpressure of 1 psi are:
   - The cloud will become immediately buoyant and disperse below the flammability limits within 1 minute regardless of when the pipeline can be closed. Thus, only the mass released over 1 minute is considered in the TNT equivalency calculations.
   - The cloud will not propagate through vegetation and congested areas since its density will be less than air.

3. The major findings from the preliminary SNL analysis are:
   - The vapor cloud will be heavier than air which will cause it to disperse near the ground and will persist after the pipe has been closed.
   - The dense-gas vapor cloud will propagate through the vegetation and congested areas which increases the likelihood of a deflagration to detonation transition.
   - Simulation results indicate that at approximately 6 to 7 minutes after release the flammability region of the vapor cloud will be either near or begin to engulf the SOCA and at 8 minutes the flammability region would surround the SOCA. Thus, if the cloud is ignited within the flammability region, the explosion would have a high likelihood of exceeding an overpressure of 1 psi at the SOCA.

It is highly stressed that the simulations are considered preliminary because a simulation study involves validation, evaluation of parameter sensitivity, and evaluation of grid independence to evaluate the level of uncertainty in predictions. Also, the accuracy of the real-gas equation as not been evaluated for the pipe simulation and the actual topography and infrastructure of the site is not included in the dispersion simulation.

References

[1] Rao Tammara, US Nuclear Regulatory Commission, "Safety Review and Confirmatory Analysis, Entergy's 10 50.59 Safety Evaluation, Algonquin Incremental Market (AIM) Project, Indian Point Energy Center (IPEC)," October 16, 2014, also supplementary analysis undated.

[2] US Nuclear Regulatory Commission, Regulatory Guide 1.91 , "Evaluations of Explosions Postulated to Occur at nearby Facilities and on Transportation Routes Near Nuclear Power Plants," Revision 2, April 2013.

[3] Factory Mutual Global's Property Loss Prevention Data Sheets 7-42, "Guidelines for Evaluating the Effects of Vapor Cloud Explosions Using a TNT Equivalency Method," May 2008.

[4] National Transporation Safety Board, "Natural Gas Pipeline Rupture and Fire Near Carlsbad, New Mexico, August 19, 2000," NTSB/PAR-03/01, 2003.

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[7] R. Zalosh, "Explosion Protection," in *SFPE Handbook of Fire Protection Engineering, 2nd ed.*, Boston, MA, Society of Fire Protection Engineers (SFPE), June 1995, pp. Chapter 16, section 3.

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[9] A. Luketa and B. Romero, "Model Evaluation Report for LNG Dispersion on Fire Dynamics Simulator Version 6.5.3," Sandia National Laboratories, Albuquerque, NM, SAND2018-12248, 2018.

[10] Elshahomi, V, et al., "Two-dimensional CFD modelling of gas decompression," in *The 6th International Pipeline Technology*, Online: http://ro.uow.edu.au/eispapers/3342, 2013.

[11] O. Kunz and W. Wagner, "The GERG-2008 Wide-Range Equation of State for Natural Gas and Other Mixtures: An Expansion of GERG-2004," *J. Chem. Eng. Data,* vol. 57, pp. 3032-3091, 2012.

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[13] A. Luketa-Hanlin, "A review of large-scale LNG spills: Experiments and modeling," *J. Haz. Mat.,* vol. A132, pp. 119-140, 2006.

[14] Office of the Inspector General, U.S. Nuclear Regulatory Commission, "Concerns Pertaining to Gas Transmission Lines at the Indian Point Nuclear Power Plant," Case No. 16-024, February 13, 2020..

[15] National Transportation Safety Board, "Rupture of Florida Gas Transmission Pipeline and Release of Natural Gas, May 4th, 2009," NTSB/PAB-13/01.

[16] K. Mishra and K. Wehrstedt, "Underground gas pipeline explosion and fire: CFD based assessment," *J. Natural Gas Sci. Eng.,* vol. 24, pp. 526-542, 2015.

Appendix A: NUREG/CR-3330 Calculation

Prepared By
Jamal Mohmand
Member of Technical Staff

Phone: (505) 844-3282
Email: jamohma@sandia.gov

NUREG/CR-3330 provides an example calculation of a fire accident scenario for a high-pressure natural gas pipeline. In the sample calculation a discharge from a 36-inch pipeline operating at 1000 psig [A.1]. From 3-1 the average flow rate of 1700 kg/s from the range of 1400-2100 kg/s was applied to the calculation.

Using the equations provided in the NUREG the results can be replicated and applied to the AIM pipeline situation. There are three main steps in calculating the incident heat flux applied to the reinforced concrete safety related structures.

Step 1: Calculate the radiated power (PR), using Equation 3.1
Step 2: Calculate the radius and diameter of the spherical flame
Step 3: Calculate the incident radiation at various distances using Equations 4.1 and 4.2[1]

Applying this methodology to the AIM pipeline the same variable assumptions were made, except for the mass flow rate of the 42-inch pipeline operating at 850 psig. According to the NRC's Review and Confirmatory Analysis the mass flow rate for the pipeline is 1935 kg/s [A.2]. The value was rounded to 1940 kg/s for the sake of this calculation and is referred to as the Nominal Case.

According to Table 3-1 of the NUREG a pipeline of 42-inch diameter would have a mass flow rate between 2000-3200 kg/s. To illustrate the impact of a pipeline of larger mass flow rate on incident heat flux a value of 4000 kg/s was used to calculate the last set of values this referred to as the Bounding Case.

Below in Table A-1 the results of incident heat flux on reinforced safety related concreate structure are shown for distances of 482, 500, 700, 1000, and 1500 meters. The Security Owner Control Area (SOCA) fence is 482 meters away. Buildings that house Emergency Diesel Generators (EDGs) are approximately 700 meters from the pipeline.

[1] For Transmissivity in Step 3, the 20% Relative humidity Curve on Figure 3-2 in NUREG/CR-3330 was used.

Table A-1: Incident Radiation at Various Distances and Mass Flow Rates

Case	Distance (m)	Mass Flow Rate (kg/s)	Radiated Power (kW)	Fire Diameter (m)	Transmissivity	Incident Radiation (kW/m^2)
Sample	482	N/A	N/A	N/A	N/A	N/A
	700	N/A	N/A	N/A	N/A	N/A
	500	1700	4.09E+07	295	0.7	19.6
	1000				0.63	4.6
	1500				0.57	2.0
Nominal	482	1940	4.57E+07	312	0.7	23.6
	500				0.7	22.1
	700				0.65	10.9
	1000				0.63	5.3
	1500				0.57	2.2
Bounding	482	4000	9.61E+07	452	0.7	44.1
	500				0.7	41.5
	700				0.65	21.4
	1000				0.63	10.7
	1500				0.57	4.4

Using the bounding mass flow rate of 4000 kg/s the incident heat flux on safety related structures if located at 482 meters would be 44 kW/m^2. Note that the same parameter assumptions were made as were made in the sample calculation; combustion efficiency, fraction of excess entrained air, and flame temperature may affect the results.

NUREG/CR-3330 states in Table 2-1 that the reinforced safety related structure would last 5 hours with an incident heat flux of 50 kW/m^2 applied. This is based on the criterion 1 which is 'Temperature at the first rebar location does not exceed 177°C (350°F)'. Since the first rebar location does not exceed this temperature, the interior temperature does not exceed this value either.

References

[A.1] U.S. Nuclear Regulatory Commission, NUREG/CR-3330, "Vulnerability of Nuclear Power Plant Structures to Large External Fires", Washington, DC, August 1983.

[A.2] Rao Tammara, US Nuclear Regulatory Commission, "Safety Review and Confirmatory Analysis, Entergy's 10 50.59 Safety Evaluation, Algonquin Incremental Market (AIM) Project, Indian Point Energy Center (IPEC)," October 16, 2014.

From: Mohmand, Jamal Ahmed
To: Dennis, Suzanne
Subject: [External_Sender] RE: RE: RE: [EXTERNAL] RE: NRC Report
Date: Wednesday, April 01, 2020 2:23:52 PM

Hi Suzanne,

I suggest adding something along these lines to the end of the sensitivity portion of the risk assessment section.

This sensitivity only fails equipment located in non Category I structures and does not take into account any cable failure impacts that could exist. The potential of safety related cables passing through buildings that are assumed to collapse in this sensitivity was not addressed. The impact of this could be wide ranging and is very plant and site specific due to the spatial nature of how cable routing is conducted. A sensitivity analysis that takes this into account is an arduous and time intensive, if the information is not already available. The sensitivity as currently presented provides a best case scenario where there are no safety related cables that pass through the buildings that are assumed to collapse.

Let me know what you think.

Thanks,
Jamal

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 1, 2020 11:12 AM
To: Mohmand, Jamal Ahmed <jamohma@sandia.gov>
Subject: RE: RE: RE: [EXTERNAL] RE: NRC Report

Hey Jamal,

I'm not sure of the status of Indian Point's fire PRA, but even if they did, I don't think the NRC could get access to it at this point.

Can you add some suggested wording to the report to caveat the results?

Thanks!
Suzanne

From: Mohmand, Jamal Ahmed <jamohma@sandia.gov>
Sent: Wednesday, April 01, 2020 11:20 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: [External_Sender] RE: RE: [EXTERNAL] RE: NRC Report

The only quick and easy solution is if Indian Point has a Fire PRA.

If they are familiar with their model it should be relatively simple to extract the basic events that would fail in non-safety related buildings.

If they don't have one, it would be time consuming to do.

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 1, 2020 8:36 AM
To: Mohmand, Jamal Ahmed <jamohma@sandia.gov>
Subject: RE: RE: [EXTERNAL] RE: NRC Report

Now's good.
Suzanne

301-415-0760
(b)(6)

From: Mohmand, Jamal Ahmed <jamohma@sandia.gov>
Sent: Wednesday, April 01, 2020 10:04 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: [External_Sender] RE: [EXTERNAL] RE: NRC Report

Hi Suzanne,

Can I give you a call now?

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Tuesday, March 31, 2020 5:24 PM
To: Mohmand, Jamal Ahmed <jamohma@sandia.gov>
Subject: [EXTERNAL] RE: NRC Report

Hey Jamal,

Just seeing this. I'm available anytime tonight and in the morning (I have a meeting at 9:30 EDT, but after that I'm free).

Suzanne

From: Mohmand, Jamal Ahmed <jamohma@sandia.gov>
Sent: Tuesday, March 31, 2020 5:19 PM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: [External_Sender] NRC Report

Hi Suzanne,

Do you have a couple minutes to talk?

Thanks,
Jamal

Jamal Mohmand
Fire, Risk, and Tranportation Systems (8854)
Sandia National Laboratories
~~+1-505-844-3282 (O)~~ | (b)(6) (C)
jamohma@sandia.gov

From: Luketa, Anay
To: Dennis, Suzanne
Cc: Sanborn, Scott Edward; Mohmand, Jamal Ahmed
Subject: [External_Sender] Review
Date: Wednesday, April 01, 2020 12:46:32 PM
Attachments: Chapter 2 update_Luketa.docx
20200331-1610 - DRAFT - Full Team Report_Luketa.docx

Hi Suzanne,

Here are my comments. Let me now if you have any questions.

Thanks,
Anay

Anay Luketa, Ph.D.
Fire Science and Technology Dept. (1532)
Sandia National Laboratories, MS-1135
Albuquerque, NM 87185
505-284-8280
aluketa@sandia.gov

Report of the U.S. Nuclear Regulatory Commission Expert Evaluation Team on Concerns Pertaining to Gas Transmission Lines Near the Indian Point Nuclear Power Plant

Principal Contributors:

- David Skeen, NRC Office of International Programs (Team Lead)
- Theresa Clark, NRC Office of Nuclear Material Safety and Safeguards (Deputy Team Lead)
- Dr. Yueh-Li (Renee) Li, NRC Office of Nuclear Reactor Regulation
- Suzanne Dennis, NRC Office of Nuclear Regulatory Research
- Steve Nanney, U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration
- Dr. Chris LaFleur, Sandia National Laboratories
- Dr. Anay Luketa, Sandia National Laboratories
- Jamal Mahmand, Sandia National Laboratories
- Brian Harris, Esq., NRC Office of the General Counsel

Completed:

[insert date]

Commented [CT1]: @Theresa – finishing check:
Accept changes
Run perfectIT
Update cross-references (F9)
Check for errors and duplicate figure numbers

Commented [CT2]: Reminder – ask Patti to declare transcripts at the same time that we declare this document (once it goes to Commission)

Commented [LA3]: Please remove our names since we weren't part of the discussion/statements made in this report, except for what is presented in Appendix B. Also, note that Chris's name should be removed since she was unable to contribute.

Executive Summary

This report provides the results of a review by the U.S. Nuclear Regulatory Commission (NRC) staff of issues raised in the NRC Inspector General's Event Inquiry titled "Concerns Pertaining to Gas Transmission Lines at the Indian Point Nuclear Power Plant" (Case No. 16-024). In response to the Event Inquiry, the NRC's Executive Director for Operations tasked a team of NRC and external experts to review the findings in the Event Inquiry and to prepare a report that could be submitted to the NRC Commission by April 9, 2020. The team members were chosen to be independent from the previous work described in the Event Inquiry and included both NRC staff and external members with expertise regarding the concerns that were raised.

Indian Point is still safe, but that Entergy (the plant owner) has more work to do. The team drew three critical conclusions related to this statement.

- **The rupture of the newly installed 42-inch natural gas transmission pipeline that runs near Indian Point is highly unlikely.** This pipeline was installed using modern techniques, stringent quality standards, and construction precautions that limit the likelihood of later pipeline damage. This stretch of pipeline was designated as a high consequence area under Department of Transportation requirements, meaning that additional inspection and documentation requirements apply. Given the remaining operating life of Units 2 and 3 (mere weeks to a year, respectively), the risk of a pipeline rupture affecting the reactor units is very small.
- **If a rupture ever did occur on the stretch of 42-inch pipeline near Indian Point, the nuclear power plant would remain protected.** The plant's safety systems are all far from the pipeline—two or more times the "potential impact radius" that the U.S. Department of Transportation designates for protecting people from pipeline ruptures, and that generally bounds most pipe rupture impacts in real-life accidents. In a more detailed transient analysis, the team found that the robust concrete structures housing the plant's safety-related equipment, spent fuel pool, and fuel storage containers would be able to withstand the heat and pressure impacts of an explosion or fire that could follow a pipeline explosion. The safety-related equipment would sustain the capability to safely shut down the reactors and maintain them in a safe shutdown condition. Equipment or structures outside these buildings could be affected, but these would be backups or alternatives to the safety-related equipment. The team also conducted a risk assessment to consider the uncertainties of the events that could unfold at Indian Point and found that the risk of serious consequences from a postulated pipeline rupture was very small.
- **Entergy should be asked to revisit the assumptions it made regarding a postulated rupture of the 42-inch pipeline.** While the team is confident in its independent safety conclusions, Entergy's analysis used assumptions that do not appear valid. Specifically, Entergy assumed a highly optimistic timeframe to isolate the pipeline. Entergy may also have been optimistic about how close to the postulated rupture the pipeline could be isolated, meaning that a smaller than realistic amount of gas was analyzed. Entergy should be asked to assess the importance of these assumptions to its conclusions and change its analysis as needed.

The NRC also needs to improve its processes and practices for technical reviews, inspection support, petition reviews, pipeline analysis, and coordination with other agencies. Separate from the technical matters, the team substantiated many of the Inspector General's procedural

Commented [CT4]: Need to verify these after analyses are finalized.

findings. The team found several ways that the NRC should improve its processes. Highlights of these findings are summarized below.

- **Technical staff need better guidance to help them decide when confirmatory analyses are necessary or appropriate.** It is not always necessary to conduct such analyses—but when they do, the work needs to be done well and documented well.
- Along these lines, **peer reviews need to be done more rigorously and consistently**. Newly updated guidance should already be helping, as long as staff and managers are trained properly.
- **Inspectors and technical experts need better guidelines for arranging formal and informal support to inspections**. Understanding and documenting expectations up front, then providing clear responses to the initial queries, will make NRC inspections work even better.
- **The NRC needs to improve its petition review processes even more**. While the process was recently updated, the team still found weaknesses in the consistency and independence of reviews, documentation of decisions, and level of detail reviewed at each stage.
- **The NRC needs to improve how it supports other agencies' reviews.** When the NRC's expertise or decisions will be cited by another agency, the NRC should follow practices it already has in place for its own environmental reviews, formalizing and documenting the interactions across agencies. This approach should also provide for a mutual understanding of each agency's objectives and regulatory context.

The body of this report amplifies these topics in six main sections and nine appendices.

- **Section 1** and its accompanying **Appendix A** provide background information on Indian Point, the natural gas transmission pipelines that run near the plant, and analyses conducted of these pipelines.
- **Section 2** and its accompanying **Appendices B, C, and D** provide technical detail. The team assessed the NRC's prior analysis of the 42-inch pipeline. The team also conducted (1) its own transient analysis to quantify the natural gas that could be released in a pipeline rupture and (2) its own risk analysis to characterize the onsite effects at Indian Point.
- **Sections 3 and 4** of the report provide information on NRC processes. The team assessed the NRC's review of a petition regarding the new 42-inch pipeline near Indian Pont. Through this assessment and other team activities, the team developed recommendations for process improvements in five different areas.
- **Section 5** of the report focuses on the specific issues raised by the NRC Office of the Inspector General, many of which are also addressed in the other sections. The team considered each issue and determined whether the team agreed with the finding, agreed in part, or disagreed.
- **Section 6** summarizes the team's conclusions. It also presents additional issues that the team or external parties identified during the course of the team's review. While the team remained vigilant for issues that could pose an immediate safety concern for Indian Point, most of these issues could not be addressed within the scope or timeframe provided to the team. These issues are presented for further consideration by the NRC, as appropriate.
- **Appendices E through I** provide supporting information for the remainder of the report. Appendix E summarizes the peer review of this report conducted by a member of the Advisory Committee on Reactor Safeguards. Appendix F has short biographical information on each team member. Appendix G collects the figures referenced in the report. Appendix H and I both

include reference information in different formats—Appendix H with selected events and references in chronological order and Appendix I containing all of the endnotes referenced throughout the document.

Table of Contents

1. Background

1.1. Indian Point Energy Center and Preexisting Natural Gas Pipelines

The Indian Point Energy Center, located in the village of Buchanan, NY (Westchester County), has three reactors on site.

- Unit 1 was one of the earliest reactors licensed by the U.S. Atomic Energy Commission (AEC), the predecessor to the U.S. Nuclear Regulatory Commission (NRC). The Consolidated Edison Company submitted its initial license application to the AEC in 1955. Indian Point Unit 1 is permanently shut down, and only operated commercially from August 1962 until October 1974. Entergy (the NRC licensee for Indian Point) has moved all of the spent fuel from Unit 1 to dry storage in an independent spent fuel storage installation on the Indian Point site. The spent fuel pool for Unit 1 has been drained and cleaned.

- Unit 2 began commercial operations in 1974. It is a Westinghouse pressurized-water reactor with a large dry containment. Per a 2017 settlement agreement between New York State, Riverkeeper, and Entergy, Unit 2 is scheduled to be shut down by April 30, 2020, before the expiration of its license in 2025. Consolidated Edison owned and operated Unit 2 until 2001, when the NRC authorized transfer of the license to Entergy.

- Unit 3, a design very similar to Unit 2, began commercial operations in 1976. Under the same agreement between New York State, Riverkeeper, and Entergy, Unit 3 is scheduled to be shut down by April 30, 2021. In 1978, operating authority for Unit 3 was transferred from Consolidated Edison to the Power Authority of the State of New York, which operated Unit 3 until 2000, when the NRC authorized transfer of the license to Entergy, which joined the sites.

Figure 1 and Figure 2 provide aerial views of the site to orient the reader.

Underground natural gas pipelines have run below the Hudson River and part of the Indian Point site since the 1950s. In this report, these pipelines are referred to as the "preexisting pipelines," in contrast to the Algonquin Incremental Market (AIM) 42-inch pipeline that was constructed long after the units began operating (see Section 1.2 of this report). The preexisting pipelines run closer to Unit 3 than to Unit 2, but in both cases are outside the security owner-controlled area (SOCA), hundreds of feet away from safety-related plant equipment.

Three pipelines related to this preexisting natural gas transmission system run under the Hudson River today:

- A 24-inch pipeline, constructed between 1952 and 1954, with a 674 psig maximum allowable operating pressure (MAOP)[1] *(see Appendix I for all notes)*

- A 30-inch pipeline, constructed between 1965 and 1967, with a 750 psig MAOP

- A 24-inch auxiliary line installed in 1992, with a 674 psig MAOP

The two pipelines that run across the Indian Point site are the 26-inch and 30-inch pipelines, which are buried between 5 and 10 feet below the surface onsite.

Appendix A presents background information on how these preexisting pipelines were evaluated by the licensee and the NRC from initial licensing through 2015.

1.2. Algonquin Incremental Market Project

In February 2014, Algonquin Gas Transmission, LLC (a subsidiary of Spectra Energy[2]) applied to the Federal Energy Regulatory Commission (FERC) for a Certificate of Public Convenience and Necessity and related authorizations for the AIM Project.[3] The AIM Project, as described in the original application, would include installing 37.6 miles of take-up and relay, loop and lateral pipeline facilities and related facilities in New York, Connecticut, and Massachusetts; adding compression capability at stations in New York, Connecticut, and Rhode Island; and modifying or constructing multiple metering and regulating stations. The project would allow Algonquin to provide 342,000 dekatherms per day (Dth/d) from a receipt point near Ramapo, NY, to delivery points in Connecticut, Rhode Island, and Massachusetts. Figure 3 in this report provides an overview of the AIM pipeline.

The new pipeline facilities included:

> ... 20.1 miles of 42-inch diameter pipeline that will replace certain segments of 26-inch diameter pipeline, including approximately 6.8 miles in Rockland County, New York, approximately 8.8 miles in Westchester County, New York, approximately 0.1 miles in Putnam County, New York and approximately 4.4 miles in Fairfield County, Connecticut (including horizontal directional drills of 0.7 miles crossing the Hudson River and 0.7 miles crossing I-84/Still River)...
>
> ... Installation of a new 42-inch [mainline valve], cross over piping and a 26-inch receiver facility at MP 5.48 (Stony Point to Yorktown Take-up and Relay) in Westchester County, New York...
>
> ... Replace the existing 26-inch valve with a 42-inch valve equipped with Remote Control Valve (RCV) capability and install cross over piping at existing MLV 15 at MP 11.0 (Stony Point to Yorktown Take-up and Relay) in Westchester County, New York...

Algonquin's application also addressed concerns regarding Indian Point that had been identified in an October 2013 letter from Entergy to the FERC.[4] (Entergy's submittal was part of a FERC prefiling review, which included environmental scoping.) The relevant discussion is in Section 10.5.3 of Resource Report 10, "Hudson River Crossing Alternative."[5] Algonquin clarified in this section that none of the existing pipelines near Indian Point could be upgraded to a higher pressure, and that the existing pipelines needed to be retained for reliability—during a planned maintenance outage of the 30-inch or 42-inch lines, the 24-inch lines could be used at a lower pressure to minimize flow interruption. Algonquin evaluated Hudson River crossings in northern (using the existing right of way through the Indian Point site) and southern (farther away from Indian Point). Algonquin decided to use the southern crossing because it would present much less risk and a much higher likelihood of success. The figure showing these alternatives is reproduced in this report as Figure 4.

As part of its review, the FERC issued a draft environmental impact statement in August 2014.[6] The FERC docket shows multiple comments from Entergy, the NRC, and interested stakeholders regarding the potential impacts of the AIM pipeline on Indian Point. The Entergy comments discussed the design enhancements that Algonquin had committed to for the pipeline along the

southern route, the evaluation that it had to conduct for Indian Point, the NRC's ongoing inspection of this evaluation (see Sections 1.2.2 below), and its decision not to oppose FERC approval of AIM following the southern route.[7] The NRC comments referenced the NRC's inspection and a planned future interaction with the FERC, as discussed in Sections 1.2.2 and 1.2.3 below.[8]

The FERC issued its final environmental impact statement in January 2015.[9] Multiple sections of the final environmental impact statement, beginning with the Executive Summary, address Indian Point. The alternatives section (Chapter 3) of the environmental impact statement discusses the northern (not selected) and southern (selected) crossings and their effects on Indian Point. The land use section (4.8) discusses Indian Point, including comments received and actions taken by Entergy and the NRC. Algonquin noted that it would coordinate all construction activities with Entergy's Indian Point site manager.

The reliability and safety section (4.12) notes the enhanced mitigation measures for construction near Indian Point, which "exceed the most stringent Class 4 requirements," in a passage related to the nearby Buchanan-Verplanck Elementary School. The FERC further noted that this section of the pipeline would be designated a high consequence area, which means it would be included in Algonquin's integrity management program under the requirements of the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration in 49 CFR 192, Subpart O, "Gas Transmission Pipeline Integrity Management (IM)."[10] This section also addresses Entergy's comments on the pipeline routing, pipeline design enhancements, construction impacts on Indian Point, and overpressure protection, as well as the results of Entergy's and the NRC's related activities.[11]

A summary of the FERC's relevant findings and bases can be found at the end of Section 4.13 of the final environmental impact statement on cumulative impacts:

> As a result of consultation between Algonquin and Entergy, Algonquin has agreed to additional design and installation enhancements along approximately 3,935 feet of the AIM Project pipeline where it would lie closest to [Indian Point] (i.e., 0.5 mile from [Indian Point's] security barrier). These measures are described in section 4.12.3. Entergy has concluded that, based on the proposed routing of the 42-inch-diameter pipeline further from safety-related equipment at [Indian Point], and accounting for the substantial design and installation enhancements agreed to by Algonquin, the proposed AIM Project poses no increased risks to [Indian Point]and there would be no significant reduction in the margin of safety at the facility. The NRC conducted its own, independent review assuming a catastrophic pipeline failure, and concurred with these findings. As such, we find there would not be any significant cumulative impacts on safety or reliability associated with the proximity of the pipeline to the [Indian Point].

The FERC issued its approval order in March 2015.[12] Paragraphs 106 and 107 of the order address Entergy's and the NRC's activities regarding Indian Point and the FERC's conclusion that "the project will not result in increased safety impacts" at Indian Point. Spectra Energy placed the AIM Project into service in November 2016.[13]

1.2.1. Entergy Actions

As noted above, Entergy was aware of Algonquin's plans to construct a 42-inch pipeline near the Indian Point site, in addition to the preexisting pipelines. This change meant that Entergy needed to consider under 10 CFR 50.59, "Changes, tests, and experiments," whether there would be effects on Indian Point needing NRC approval.[14]

Entergy submitted its evaluation results to the NRC in August 2014, referencing the AIM pipeline application and draft environmental impact statement discussed above.[15] Entergy noted its plans to comment on the FERC draft environmental impact statement and concluded its letter with this passage:

> Entergy has determined that there are no increased risks to Indian Point and, pursuant to 10 CFR § 50.59, has concluded that prior NRC review and approval is not required. In our submittal to FERC we plan to point out that as part of the routine inspection program NRC always has the right to review and challenge any analysis done pursuant to 10 CFR 50.59. Unless NRC chooses to perform such a review we cannot guarantee that they would ultimately concur with our position. Therefore we will suggest that prior to approving the Project, FERC should consider conferring with the NRC before reaching a conclusion regarding the potential hazards posed by the AIM project on [Indian Point] and whether any additional mitigation is necessary. Accordingly, we are forwarding to the NRC the enclosed Safety Evaluation and Hazards Analyses and are prepared to answer any questions NRC may have on the Analyses or support inspections of the same.

Entergy, in its 10 CFR 50.59 evaluation, described earlier evaluations of the preexisting pipelines (all of which are discussed in Appendix A to this report), the routing and design of the planned AIM pipeline, and actions that the pipeline operator would take in the event of a rupture.[16] Entergy discussed application guidance in Regulatory Guide 1.70 and staff review guidance in Standard Review Plan Section 2.2.3 for considering design-basis events external to the plant, as well as guidance in Regulatory Guide 1.91 for evaluating postulated failures at nearby facilities and transportation routes.[17] Entergy used this guidance to evaluate the exposure rates (likelihood) of pipeline failures and effects (consequences) of such events. The analysis resulted in a list of distances from the pipeline beyond which damage was *not* postulated:

- 1,266 feet to withstand heat flux from jet fires (at 12.6 kW/m^2)
- 1,155 feet to withstand detonation of a vapor cloud (at 1 psi overpressure)
- 900 feet to withstand missiles generated by the rupture (based on the maximum distance observed)

Entergy then evaluated structures and equipment that was closer to the pipeline (either the enhanced pipeline nearest near the site or the closest non-enhanced portions offsite) than these distances. The switchyard and fuel oil storage tank for the Unit 2 and 3 emergency diesel generators, which are just over 100 feet from the nearest approach of the 42-inch pipeline, could be destroyed because of a pipeline rupture. Entergy clarified that the loss of offsite power that would result had already been analyzed and is a relatively high probability event for other reasons. The fuel oil storage tank is a source of fuel to the diesel generators beyond the onsite "day tanks" to ensure they have an overall 7-day supply of fuel. Offsite fuel could be obtained and provided to the site through alternative access routes. Entergy noted that it would move an associated tanker truck. Other equipment and structures were either significantly further away or had backup capability. Of note, the SOCA fence (which bounds all safety-related equipment onsite) is at least 1,580 feet away from the pipeline. Figure 5 shows views of the AIM pipeline right of way from near Indian Point to provide perspective on the distance and terrain.

Entergy also assessed the frequency of a pipeline explosion "using industry data and correlating it to more recent data." The resulting rupture frequencies for generic pipeline and enhanced pipeline were 1.32×10^{-5} per year per mile and 1.98×10^{-6} per year per mile, respectively.[18] Entergy also

estimated associated probabilities of jet fires, explosions, and missiles at various equipment locations.

Entergy concluded that the potential for increased risk to the public was acceptably low because no safety-related structures, systems, or components (SSCs) or security features would be damaged by a pipeline rupture, the effects on other SSCs from ruptures would not have a significant effect on plant safety, and the frequency of damage to such SSCs would generally preclude consideration of such. Entergy used these evaluations to answer the questions associated with 10 CFR 50.59 and determined that prior NRC approval was not needed to address these issues.

In April 2015, Entergy submitted a revised 10 CFR 50.59 evaluation to the NRC.[19] This revision reflected "additional tie-in details for certain limited above-ground segments of the gas pipelines" that Algonquin had shared with Entergy. Only a portion of the 26-inch pipeline is above ground at that location, where it ends at a receiving pig trap, and no portions of the 30-inch or 42-inch main pipelines are above ground. Several smaller-diameter pipe segments for valve actuators, equalizing lines, and pig tie-ins are above ground at that location. Figure 6 shows views of this above-ground area from a publicly accessible location.

In the 2014 analysis, Entergy had considered a sabotage event or rupture at an above-ground portion of the pipeline and concluded that this area was sufficiently far away from all important equipment not to pose a risk. In the 2015 analysis, Entergy reevaluated a rupture of all above-ground components during pigging of the 26-inch pipeline. The heat flux and overpressure were smaller than the previous calculation, so Entergy concluded that its previous conclusions regarding 10 CFR 50.59 remained valid.

Entergy updated the final safety analysis reports (FSARs) for Units 2 and 3 to reflect the analyses of the new 42-inch pipeline.[20]

1.2.2. NRC Response to Entergy Actions

As indicated above, the NRC conducted an inspection of Entergy's 10 CFR 50.59 evaluation using Inspection Procedure 71111.18, "Plant Modifications."[21] The NRC documented the results in a November 2014 quarterly inspection report for Indian Point.[22] As part of the inspection, NRC staff reviewed the Entergy documentation, "walked down" the proposed pipeline routing, and independently analyzed the potential hazards associated with failure of the proposed pipeline. These staff members prepared additional documentation to support the summary that was included in the inspection report.[23] The NRC concluded in the inspection report that "Entergy had appropriately concluded that the proposed pipeline does not introduce significant additional risk to safety-related SSCs and SSCs important-to-safety at Indian Point Units 2 and 3; and, therefore, the change in the design bases external hazards analysis associated with the proposed pipeline does not require prior NRC review and approval."

Since Entergy determined under 10 CFR 50.59 that NRC approval was not needed, and the NRC did not identify issues with this determination, the NRC did not conduct a licensing review or formally request additional information from Entergy (as might have been done in a licensing review).

1.2.3. NRC Coordination with FERC

Early in its review, the FERC offered the NRC the opportunity to participate formally with the FERC as a "cooperating agency" for the environmental review. Staff from both agencies discussed this option in April 2014 teleconferences.[24] As part of these interactions, the FERC shared public comments from the prefiling review and shared insights on the benefits of being a cooperating agency; the NRC explained Entergy's and the NRC's role in the process. The NRC determined that it

did not intend to become a cooperating agency, but would consider providing appropriate information, once available, on the impacts of the AIM Project.

As indicated above, the NRC commented on the FERC draft environmental impact statement in September 2014.[25] The NRC noted that its inspection of Entergy's hazards analysis was ongoing, with the results scheduled for issuance in mid-November 2014. The NRC recommended that it discuss the inspection findings with the FERC in October 2014 to allow more time for the FERC to prepare its final environmental impact statement.

This meeting occurred via teleconference on October 17, 2014.[26] In its meeting summary, the FERC made note of the Entergy and NRC analyses, as well as the additional mitigation measures that were part of the pipeline design. The FERC stated the following:

> Based on its review, the NRC came to the same conclusion that Entergy did in its [10 CFR] 50.59 submission. Therefore, NRC finds Entergy's 50.59 submission acceptable and has determined that no prior approval from the NRC is needed. NRC also indicated that the existing pipelines have been studied extensively, including as recently as 2008.

1.2.4. 10 CFR 2.206 Petition

During this timeframe, the NRC also reviewed a 10 CFR 2.206 petition that raised issues with the 10 CFR 50.59 evaluation conducted by Entergy. The petitioner requested that the NRC take enforcement action against Entergy for violating regulations and raised concerns regarding the NRC's inspection, oversight, and handling of several portions of his petition. The NRC rejected this petition, citing prior reviews of the issues raised by the petitioner. Additional information on the petition and the NRC's handling of it is presented in Section 3 of this report.

1.3. Event Inquiry and Expert Evaluation Team

On February 13, 2020, the NRC Office of the Inspector General (OIG) issued an Event Inquiry, "Concerns Pertaining to Gas Transmission Lines at the Indian Point Nuclear Power Plant" (Case No. 16-024).[27] In that report, the OIG raised concerns regarding (1) the NRC's safety analysis that supported the FERC determination to approve modifications to gas pipelines at Indian Point and (2) the NRC's response to a related 10 CFR 2.206 petition.

On February 24, 2020, the NRC Chairman directed the NRC staff to determine whether any immediate regulatory action was needed.[28] NRC staff promptly reviewed the OIG report and the technical aspects of the 42-inch gas line that runs near the Indian Point property. Based on this prompt review, the Executive Director for Operations (EDO) determined that there were no safety issues warranting immediate regulatory action at Indian Point.[29]

The staff was further directed to review whether any information in the OIG report demonstrates that the staff should revisit either the safety analysis or its response to the 10 CFR 2.206 petition, as well as to evaluate whether any modifications to agency practice or procedures are needed or appropriate based on the OIG report. On February 27, 2020, the EDO established an evaluation team to carry out the review directed by the NRC Chairman.[30] This report summarizes the results of that review.

The NRC publicly released the team's evaluation plan on March 9, 2020, including team membership.[31] The team was led by David Skeen (Deputy Director, Office of International Programs) and Theresa Clark (Deputy Director; Division of Rulemaking, Environmental, and Financial Support; Office of Nuclear Material Safety and Safeguards). NRC members were

independent of prior reviews in this area. The team included experts in NRC engineering reviews and risk analysis. The team also included external experts independent of the NRC's prior activities on this subject. A pipeline safety analysis expert from the Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) independently reviewed the NRC and Entergy safety analyses. In addition, the NRC contracted ~~for~~ experienced researchers at Sandia National Laboratories to provide expertise on natural gas modeling and fire risk. Biographies of the team members are included in 0 to this report.

As directed by the EDO, on March 18, 2020, the team identified modifications that may be needed to agency practices or procedures.[32] The team noted that peer reviews should be strengthened, guidance for supporting inspections should be clarified, the structure for reviewing 10 CFR 2.206 petitions should be revisited, and interagency coordination should be strengthened. Section 4 of this report provides additional detail on process improvements recommended by the team.

The results of the team's activities are documented in the following sections of this report. The major activities of the team between February 27, 2020, and April 9, 2020, were:

- Conducting one or more interviews each with:
  - 15 NRC staff and managers in Office of Nuclear Reactor Regulation (NRR) and Region I who were directly involved in the NRC's inspection, analysis, and petition review
  - 2 members of the public who had previously raised concerns with the NRC's handling of these issues[33]
  - 3 Entergy staff members who were involved in evaluations of pipeline hazards
- Reviewing numerous public and non-public documents, as referenced in the chronology that the team assembled (Appendix H) and the endnotes to this report (Appendix I)
- Visiting the Indian Point site to directly observe pipeline locations, plant safety systems, and equipment and structures that could be affected by a pipeline rupture
- Conducting various risk and consequence analyses for pipeline ruptures, as discussed further in this report (notably Section 2, Appendix B, Appendix C, and Appendix D)
- Coordinating with NRC fire experts in the Office of Nuclear Regulatory Research to understand the bases for equations and references in Regulatory Guide 1.91[34]

During the team's review, the team or external parties identified issues separate from those included in the Chairman and EDO taskings. While the team remained vigilant for issues that could pose an immediate safety concern for Indian Point, most of the issues raised could not be addressed within the scope or timeframe provided to the team. Section 6.3 of this report collects these issues for further consideration by the NRC, as appropriate.

2. Conclusions Regarding Safety Analysis

Throughout its work, the team remained focused on the safety of Indian Point and whether new information revealed the need to take immediate regulatory action. The team did not identify any concerns that met this threshold. This section of the report describes how the team considered the safety of Indian Point in proximity to the AIM pipeline, from three perspectives: the likelihood of a pipe rupture and blowdown that could affect Indian Point, the consequences a pipeline explosion (overpressurization and missiles), and the consequences of a pipeline-rupture-related fire (heat impacts). The team considered historical experience and conducted its own analyses of dynamic gas behavior following a pipe rupture and the risk of subsequent impacts at Indian Point. The subsections below address these topics in detail.

2.1. Pipe Rupture and Blowdown Likelihood

2.1.1. Design and Construction Enhancements

The team obtained information from Enbridge (the AIM pipeline operator) regarding the enhanced design and construction of the AIM pipeline near Indian Point. Similar information had been provided to Entergy, in support of its 10 CFR 50.59 evaluation, and other requesting parties. These measures generally exceed the applicable Department of Transportation requirements under 49 CFR Part 192, "Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards." For example, the enhanced protections for the pipeline adjacent to Indian Point include:

- A more stringent design factor, higher-grade pipe[35], and deeper burial than required
- Fusion-bonded epoxy coatings for corrosion control inside and outside the pipe, an abrasive resistant overlay outside the pipe, and no shrink sleeves or tape coatings on field weld joints
- 100-percent non-destructive examination of all girth welds; 100-percent inspection of all welding, coating, and backfilling activities; and "pigging" after construction to identify any dents exceeding code limitations

Enbridge also placed fiber-reinforced concrete slabs and warning tape above the pipeline near Indian Point to reduce the likelihood of construction digging or other activities reaching and damaging the pipeline.

In general, these enhancements mean that the likelihood of a pipeline rupture through known risk factors such as welding flaws, corrosion, and incidental damage is reduced. The team's peer reviewer (see Appendix E) observed this when reviewing the team's event frequency estimate discussed in Section 2.5 below:

> The method used to establish the initiating event frequency, although based on actual data, does not have a high degree of statistical confidence or relevance to the AIM pipeline. The data are a limited sample, and there were likely different causes and conditions associated with each of the fifteen rupture events (seam weld manufacturing defects/low toughness, external corrosion, stress corrosion cracking, and third-party damage are the more common ones). And these conditions are not directly applicable to the subject AIM pipeline. Most, if not all, of these failures were likely in legacy pipelines, manufactured to less rigorous standards than current practice and have been subjected to many years of potential in-service degradation. This is especially true for the ~4000 ft of enhanced AIM pipeline in closest proximity to [Indian Point]. Therefore, although there is a high degree [of] uncertainty in the assumed initiating event frequency, **it is likely that the**

uncertainty is in the direction of making this estimate much higher than the true rupture frequency of that pipeline segment. *(emphasis added)*

The team did not attempt to quantify a reduced pipeline rupture frequency for the AIM pipeline near Indian Point, given the uncertainties. In the team's view, optimistic estimates of failure *frequencies* (one in a million per year or less) often lead the licensee or the NRC to assess failure *consequences* in less detail. Therefore, the team continued with its analysis applying a more general failure frequency.

2.1.2. Risk Assessment and Mitigation

After construction, pipeline operators continue to assess and mitigate the risks to their pipelines through "integrity management." For high consequence areas,[36] the relevant requirements are in 49 CFR 192, Subpart O. The AIM pipeline near Indian Point is identified as being in a high consequence area, so these requirements apply. Relevant requirements for this case include:

- **Having an integrity management program (49 CFR 192.911, among others).** These programs include identification of high consequence areas, plans for various assessments, processes for continual evaluation, and certain procedures. Operators must continually improve their programs. The team obtained information from Enbridge verifying that it has an integrity management program and risk assessment process that manages, monitors, and addresses various types of corrosion, defects in the pipeline, third-party damage, operations issues, and weather. Enbridge's program manual lays out the general approaches taken by Algonquin Gas Transmission.[37]
- **Assessing threats to the pipeline and taking actions to mitigate the risks (49 CFR 192.917 and 192.935, among others).** "Threats" for purposes of this assessment include those listed in the American Society of Mechanical Engineers and American National Standards Institute (ASME/ANSI) Standard B31.8S,[38] such as corrosion, construction defects, third party damage, and human error. Operators use this standard to assess the risks associated with each threat and prioritize what baseline assessments and reassessments are needed, as well as what preventive and mitigative measures will be taken. Preventive and mitigative measures are based on the risk assessment and can include installing remote control valves, replacing pipe segments with pipe of heavier wall thickness, operating below 30 percent of the specified minimum yield strength,[39] and conducting training and drills. [insert enbridge]
- **Conducting a baseline assessment and continuous assessments (49 CFR 192.921, 192.937, and 192.939, among others).** As appropriate for the pipeline segments, the operator conducts internal inspections to detect corrosion or other threats, pressure tests in accordance with 49 CFR 192, Subpart J, "Test Requirements,"[40] and direct assessments for corrosion. Operators must conduct this baseline assessment within 10 years from the date a pipeline is installed. The pressure test under 49 CFR 192, Subpart J, can satisfy the requirement for a baseline assessment. Operators must continue to assess the pipeline, with a reassessment occurring no more than 7 years after the baseline assessment. The reassessments, similarly, can also include pressure tests or direct corrosion assessments. [insert enbridge]

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The team also gained access to a risk assessment contracted by the State of New York to assess infrastructure near the AIM pipeline and the risks of damage to the pipeline.[41] The risk assessment was based on experts' judgment and did not quantify probabilities and consequences of specific scenarios. This evaluation considered risks to pipeline integrity such as corrosion and other material issues, excavation and other sources of damage, as well as equipment and operational failures. All risks specific to Indian Point were categorized as "unlikely." Mitigation and emergency

response strategies were identified for each, including actions that the New York State Department of Public Safety would take. The appendix on Indian Point pipeline impacts summarized publicly available analyses related to the pre-existing and AIM pipelines and referenced prior conclusions by the NRC and licensees.

Collectively, these ongoing activities provided the team with further confidence that a pipeline rupture is unlikely, though (as noted above) the team did not attempt to quantify the risk reduction from such activities.

2.1.3. Isolation of a Pipeline Rupture

If a rupture occurs on the AIM pipeline near Indian Point, the effects on the nuclear power plant would depend on the volume of gas released. The volume of gas released is a function of the speed with which the pipeline operator isolates the ruptured pipeline. It is also a function of the length of pipeline that would be isolated, which determines the amount of gas available to flow out the break and feed a fire or other consequences. Entergy and the NRC have made different assumptions regarding these variables. The team obtained updated information from Enbridge on the methods that the pipeline operator would use to isolate a rupture.

Enbridge informed the team that the 42-inch AIM pipeline is continuously monitored from a gas control center in Houston, TX. The control center monitors pressures, flows, and station status (including discharge and suction pressures). The Supervisory Control and Data Acquisition system is used to detect ruptures and was specifically enhanced to include a schematic screen to expedite evaluation and isolation. Alarms include a rate-of-change alarm that detects a pressure drop on the line. If the data indicates a rupture requiring valve closures, gas controllers have the authority, autonomy, and ability to close valves to isolate the pipeline. They are also trained to isolate other affected facilities including shutting down the compressor station across the Hudson River.

Enbridge has procedures for emergency notification, emergency response, alarm management, and response to abnormal operations that it would apply in these cases. The procedures indicate that the operator may have enough information from his data system, alarms, and trends to enable emergency response actions. If the data is not clear, the operators can use reports from outside sources such as emergency services or public officials to justify isolating a line. The controller is not required to have such verification to isolate the line if the data is clear.

The mainline valves for the 42-inch pipeline are remote-operated from the Houston control center. The control center can also monitor pressures on the upstream and downstream sides of the valves. Enbridge estimated, based on tabletop training and operating experience, that it would take up to eight minutes to identify a rupture using the Supervisory Control and Data Acquisition system, confirm that the valves need to be closed, and close the valves. Enbridge noted that three minutes (previously referenced by Entergy) would be a "best case"; confirmation of the event could add additional time to the assumed closure time. The team notes that accident experience, as discussed in Section 2.4, indicates that ruptured pipelines have taken minutes to hours to isolate, depending on the issue and whether valves can be remotely operated.

Enbridge informed the team that these mainline valves on the 42-inch AIM pipeline near Indian Point were closer together (i.e., could isolate a smaller segment of pipeline) than required by regulations. The team obtained schematics showing the location of mainline isolation valves near Indian Point. As has been stated in multiple other evaluations, the nearest remote-controlled valves to Indian Point are about 2.8 miles apart. The next closest downstream valve—which is also remote controlled—is about 5.6 miles downstream. The next closest upstream valve is associated with the Stony Point compressor station, about 2.5 miles further upstream. Based on the PHMSA team

member's experience, in some cases the pressure drop from a pipeline rupture may make it challenging to close the nearest valve to a rupture, and operators could need to close a further valve. The team concludes that the minimum unisolated pipeline length is about 2.8 miles. Depending on circumstances, the length could increase to about 5.3, 8.4, or 10.9 miles.

As a result of these issues, the team recommends that Entergy reevaluate its assumptions on a three-minute pipeline isolation time and a gas volume based on approximately 3 miles of isolated pipe, as discussed in Section 2.6. The related OIG finding is also discussed in Section 5.1.5.

2.2. Pipe Rupture Consequences – Overpressurization and Missiles

Regulatory Guide 1.91 states that "[a] demonstration that the rate of exposure to a peak positive incident overpressure in excess of 1.0 psi (6.9 kPa) is less than 10^{-6} per year when based on conservative assumptions, or 10^{-7} per year when based on realistic assumptions, is acceptable." Additionally, the guide states that "[i]f this criteria cannot be met, then the applicant may show through analysis that the risk to the public is acceptably low on the basis of the capability of the safety-related structures to withstand blast and missile effects associated with detonation of the potentially explosive material."

In the 2014 and 2015 10 CFR 50.59 evaluations,[42] Entergy found that the frequency of a peak overpressure may be more than 10^{-6} per year, so a detailed evaluation was needed to illustrate that the safety-related structures could withstand blast and missile effects. For missile effects, Entergy noted that 900 feet is the greatest distance noted in the literature, which is less than the distance to any plant systems within the SOCA. For blast effects, Entergy calculated that a vapor cloud explosion would not damage important-to-safety SSCs within the SOCA.

The NRC staff's inspection report[43] stated that:

> The staff determined that the impacts to the SSCs important-to-safety outside the SOCA from the proposed new pipeline are bounded by the impacts from low probability events of extreme natural phenomena (including seismic activity, tornado winds, and hurricanes) which have been previously assessed and are addressed in the Indian Point Units 2 and 3 [updated FSARs].

The team could not verify the assumption that the Unit 2 and Unit 3 updated FSARs bounded the impacts for missiles. Additional information on this assumption is provided in Section 5.2.2. However, for missiles, the team did find that the largest distance that a pipe has been thrown is 600 feet. (According to PHMSA, the 900 feet reported by Entergy for one incident was an initial estimate by accident investigators, but the final established distance was 564 feet.) For overpressurization, the team was not able to verify that there was no impact to SSCs required for safe shutdown. A probabilistic risk assessment was done to determine the increased risk to the plant from a pipeline rupture. Section 2.5 provides more information on this risk assessment.

The team reviewed a study on valve closure timings conducted by Oak Ridge National Laboratory for PHMSA. The report notes that blast and overpressure effects were not evaluated because they occur immediately after the break, which could not be mitigated by different valve closure times.[44]

[SNL evaluation]

[TTO-14]

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Update to address SNL report:
- In replicating aspects of prior NRC analyses, found areas where assumptions may not be valid. (List/describe.) RG 1.91 should be updated to address these when detailed analyses are needed. (Refer to 4.4.)
- Conducted sensitivity study for dispersion of the gas volume that could come out of the break. Showed large distance to which a dense gas cloud could travel. Assumes wind conditions, ignition sources, etc. drive the cloud toward the plant without early ignition. Bounding case.
- Plant impacts of this gas cloud were not quantified and local terrain/weather was not considered, would be more detailed analysis.
- Not discounting potential physical phenomena, but accident experience is not consistent. (Refer to 2.4.) Also, experienced pipeline people (reference Kuprewicz transcript) emphasize that heat flux as the controlling impact.
- Maintain reasonable assurance of adequate protection.

Also, will need to add SNL report to appendix when we PDF this and correct page numbers based on the final page count.

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2.3. Pipe Rupture Consequences – Jet or Cloud Fires

Department of Transportation regulation 49 CFR 192.903, "What definitions apply to this subpart?" defines terms including "potential impact radius." The potential impact radius "means the radius of a circle within which the potential failure of a pipeline could have significant impact on people or property." The equation included in the regulation is:

$$r = 0.69\sqrt{p * d^2}$$

In this equation, r is the potential impact radius (ft), p is the MAOP of the pipeline (psi), and d is the pipeline diameter (in). This equation is associated with the heat-affected area,[45] as described further in the notice issuing the rule[46] and the technical basis provided in C-FER report prepared for the Gas Research Institute.[47]

Based on the input from the team's PHMSA member and the team's interview with an independent gas pipeline expert, the potential impact radius is the radius for a person to get out of the area within 30 seconds and is not meant to be used to determine the survivability of buildings. They recommended multiplying the calculated potential impact radius by 1.5 to 2 as a "rule of thumb" to determine a safe distance for buildings. This aligns with the Oak Ridge National Laboratory report mentioned above,[48] which evaluated the thermal impacts of double-ended guillotine breaks and noted that severe damage could occur within 1.5 to 1.7 times the potential impact radius. This also aligns with the risk assessment done by New York State, which referenced the Oak Ridge National Laboratory report as part of its basis for the area considered in the State's risk assessment.[49]

Using this formula for the 42-inch, 850-psi gas pipeline at Indian Point results in a potential impact radius of 845 feet. Doubling this number results in an expanded impact radius of 1,690 feet. This radius would impact the area inside the SOCA; however, it would not impact any safety-related structures.

Entergy found that at the SOCA fence, heat fluxes would be below 10 kW/m^2, and that the heat flux at 2,028 feet (a location inside the SOCA fence but not impacting safety-related systems) is only 5 kW/m^2.[50]

NUREG/CR-3330[51] discusses the survivability of reinforced concrete at various heat fluxes for varying points inside a wall, the closest point being six inches inside the wall. At Indian Point Unit 3, the diesel generator building has the thinnest walls of all safety-related buildings at 24 inches.[52] The thinnest point of containment is 42 inches,[53] and the thinnest point of the auxiliary building above ground is 30 inches.[54] NUREG/CR-3330 notes that at a heat flux of 15 kW/m^2, it will take 11.6 hours for temperature at six inches inside the wall to exceed 350 degrees Fahrenheit (177 degrees Celsius) and 5 hours if the heat flux was 50 kW/m^2.

The team's independent analysis based on calculations in NUREG/CR-3330 found that heat fluxes at the closest safety-related structure would be 11 kW/m^2 for a mass flow rate of 1940 kg/s. For a bounding flow rate of 4000 kg/s, the heat flux would be 21 kW/m^2. Even at the bounding flow rate, the pipeline would not need to be shut off for over eight hours. This greatly exceeds the estimated time it would take for the gas pipeline to be shut off; therefore, the heat flux would have no impact on safety-related structures. An appendix to the Sandia National Laboratories report (included as Appendix B to this report) presents this analysis in more detail.

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The team concludes that a jet or cloud fire would not impact the plant's safety.

2.4. Historical Pipe Rupture Experience

To provide perspective for the team's analytical results, the team obtained information from PHMSA's accident investigation division on some actual pipeline ruptures, summarized in Table 1. While this was a relatively small sample, it provided important background information to the team. In the table, the "impacted area" refers to the distance away from the pipeline where investigators found impacts as a result of the pipeline rupture. Impacted areas are generally an ellipse with a length parallel to the pipeline (and longer in the direction that had more compressed gas available) and a shorter width perpendicular to the pipeline. Most of these impacts were within or near the PIR, with none being further than 1.6 times the PIR. As noted above, isolation times can be relatively long in certain circumstances, such as when valves need to be locally operated or when shutting off the pipeline could have more significant consequences (e.g., for customers who need heating) than the fire. PHMSA staff stated that fires do not ignite in all cases, as both an arc and the correct atmosphere are needed to ignite the gas vapors.

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Table 1. PHMSA pipeline accident data showing pipe diameter and allowable pressure, calculated potential impact radius, impacted area, distance pipe was ejected, time to isolate the line, and duration of fire. "NR" is shown where data was not reported, and "N/A" is shown where the event did not occur.

Year	Location	Pipe Dia. (in.)	MAOP (psi)	PIR (ft.)	Impacted Area Length (ft.)	Impacted Area Width (ft.)	Pipe Ejected (ft.)	Isolation Time (h:mm)	Fire Duration (h:mm)
1985	Beaumont, KY	30	936	633	700	500	NR	NR	NR
2003	Viola, IL	24	975	517	not reported (NR)		554	8:48	11:55
2008	Appomattox, VA	30	800	585	566	200	N/A	NR	NR
2010	San Bruno, CA	30	375	401	375	160	100	1:35	2:35
2017	Dixon, IL	20	800	390	365	163	N/A	0:31	3:06
2018	Batesville, OH	24	1440	628	50	50	N/A	0:00	1:04
2018	Moundville, OH	36	1440	943	250	250	100	0:25	3:05
2018	Hesston, KS	26	899	538	400	200	254	0:02	2:44
2018	Buffalo, OK	26	765	496	110	60	170	1:09	N/A
2018	Woodruff, UT	20	918	418	143	90	430	1:21	N/A
2018	Dixon Springs, TN	22	773	422	30	20	75	0:38	N/A
2019	Caldwell, OH	30	936	633	500	500	N/A	1:35	14:05
2019	Mexico, MO	30	900	621	437	286	125	1:12	1:31
2019	Hot Springs, AR	30	1000	655	252	114	306	2:12	N/A
2019	Danville, KY	30	936	633	704	645	600	1:52	3:07
2019	Artesia, NM	20	1000	436	687	60	360	3:23	N/A

This experience, which is mostly from the last few years since PHMSA formed its accident investigation division, is generally consistent with earlier information included in the C-FER report referenced above.[55] The C-FER report collected information on incidents from 1969 to 1995 and compared actual incident outcomes to the proposed hazard area model—which became the potential impact radius under 49 CFR Part 192. Figure 7 shows the comparison of distances that was included in the C-FER report. In all but one case, the potential impact radius was larger than the burn area or distance where any injuries was seen. Where the burn area was larger (NTSB-PAR-71-1), it was about 1.1 times the potential impact radius.

Figure 8 shows four examples of pipeline ruptures, including those with and without fires. The elliptical nature of the most severe impacts is demonstrated in the two left-hand images, fire and debris damage can be seen in the bottom-right image, and a rupture crater is shown clearly in the top-right image.

The team discussed pipeline ruptures with the PHMSA accident investigation staff who prepared the more recent data. The PHMSA staff confirmed that, in their experience, that they had never seen explosions occurring away from the initial rupture site or any other damage outside the area damaged by heat or fire. Also, in their recollection, only one of these (San Bruno) occurred within a high consequence area, and pipeline construction contributed to that failure.

2.5. Pipe Rupture Risk Assessment

The NRC uses a variety of methods to determine the safety significance of postulated events. Two of these methods use the insights from probabilistic risk assessments. One is the significance determination process,[56] which uses risk insights, where appropriate, to help the NRC determine the safety significance of inspection findings. The other is Regulatory Guide 1.174, "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."[57]

Both of these approaches use the metric of change in core damage frequency resulting from the situation to assess an inspection finding or a licensing basis change. These approaches define a small change to be less than one in a million years (10^{-6}). The NRC uses the agency's independent risk models to evaluate the change in core damage frequency. The team, with support from experts at the Idaho National Laboratory, modified the Indian Point models to reflect a pipeline failure and conducted a risk analysis. The team assumed that a pipeline failure would cause an unrecoverable loss of the Buchanan switchyard and cause loss of the city water tank. Based on these analyses, the team found that the change for both plants was an increase of one in 63 million years (1.6×10^{-8} per year), which is well below the agency's defined threshold for a "small" change in risk of one in a million years.

Because of the uncertainty associated with the consequences of overpressurization from an explosion, the team also performed a sensitivity analysis. This analysis assumed that all equipment not in a seismic Category I structure (i.e., not located in the primary auxiliary building, diesel generator building, or reactor containment) was lost upon the pipeline rupture. The seismic Category I buildings are designed to withstand a pressure drop of 3 psi[58], and it is assumed that the overpressurization will not exceed this value. The team primarily evaluated Unit 3 for this sensitivity, since it is closer to the 42-inch AIM pipeline and would experience more severe impacts. The change in core damage frequency for this scenario was one in 5.7 million years (1.75×10^{-7} per year). Again, this is below the agency's threshold for a "small" change in risk of one in a million years.

The team was concerned that PHMSA's data provided a national pipeline mileage that included all diameters of pipes, not just large pipes, which could be non-conservative if used to calculate an event frequency. The team independently reviewed publicly available data.[59] Using the last ten years' worth of data, the team determined Class 2, 3, or 4 carbon steel transmission lines with pipe diameters greater than or equal to 20 inches and maximum operating pressures greater than or equal to 300 psig rupture with a frequency of 2.4×10^{-5} per mile per year. The team recalculated the change in core damage frequency using this higher frequency and concluded that the change in risk remained below the agency's threshold for a "small" change in risk. More information on the team risk assessment and the PHMSA data can be found in Appendix C and Appendix D, respectively.

The agency's independent models only consider reactor risk, so the spent fuel pools and the dry fuel storage location must be considered separately. The spent fuel storage pit for Indian Point Unit 3 is a seismic Category I structure and is designed for a pressure drop of 3 psi. Given this rugged construction, the concludes that a pipeline rupture would not negatively affect the spent fuel pit, though the surrounding building could be damaged. Indian Point Units 2 and 3 use the Holtec

HI-STORM 100 dry cask storage system.[60] The HI-STORM 100 dry cask storage system is also designed for a pressure drop of 3 psi. The team also concludes that the dry fuel storage location, which is much farther from the 42-inch AIM pipeline than the other structures evaluated, would not be negatively affected by a pipeline rupture.[61]

2.6. Recommendation – Ask Entergy to Revisit its 10 CFR 50.59 Evaluation

Although the team did not conclude that immediate regulatory action is needed regarding Indian Point, the team does recommend further work be done by Entergy to show that its prior conclusions remain valid. **Based on concerns raised by external parties and substantiated by the team, the team recommends that the NRC request Entergy under 10 CFR 50.54(f) to submit updated information regarding the implications of the assumption that the 42-inch AIM pipeline could be isolated within 3 minutes and the length of pipe that would be isolated.** Entergy should either revisit its analysis applying an updated assumption or providing a basis for why the assumptions are not relevant to the conclusions previously presented.

During the NRC's review of the October 2014 petition referenced in Section 1.2.4, the petitioner raised a concern that Entergy provided inaccurate or incomplete information contrary to the requirements in 10 CFR 50.9, "Completeness and accuracy of information."[62] The petitioner also asserted that the licensee may have violated 10 CFR 50.5, "Deliberate misconduct."[63] The petitioner's concern centered on whether it was appropriate to model the 42-inch AIM pipeline being isolated in 3 minutes.[64] To this day, the petitioner continues to assert that the Entergy knew that the isolation times were inaccurate and material to the NRC determination.[65]

For purposes of addressing the issue raised by the petitioner, deliberate misconduct occurs when a licensee voluntarily and intentionally (1) engages in conduct that it knows to be contrary to a requirement, or (2) provides materially inaccurate or incomplete information.[66] Specifically, the requirements in 10 CFR 50.5 state, in relevant part, that licensees may not:

> Engage in deliberate misconduct that causes or would have caused, if not detected, a licensee or applicant to be in violation of any rule, regulation, or order; or any term, condition, or limitation of any license issued by the Commission; or
>
> Deliberately submit to the NRC, a licensee, an applicant, or a licensee's or applicant's contractor or subcontractor, information that the person submitting the information knows to be incomplete or inaccurate in some respect material to the NRC.
>
> ...deliberate misconduct by a person means an intentional act or omission that the person knows: ... Would cause a licensee or applicant to be in violation of any rule, regulation, or order; or any term, condition, or limitation, of any license issued by the Commission; or ... Constitutes a violation of a requirement, procedure, instruction, contract, purchase order, or policy of a licensee, applicant, contractor, or subcontractor.

Similarly, 10 CFR 50.9 states, in relevant part, that:

> Information provided to the Commission ... by a licensee ... shall be complete and accurate in all material respects.

Since the licensee's initial and revised 10 CFR 50.59 analysis, as described in Section 1.2.1 above, additional information has been developed that questions Entergy's assumptions on pipeline isolation. Because some of these initial assumptions have had reasonable challenges to their

validity, the licensee should revisit its 10 CFR 50.59 analysis to verify whether its conclusion remain valid in light of this new information.

3. Conclusions Regarding 10 CFR 2.206 Petition

In October 2014, a member of the public submitted a 10 CFR 2.206 petition regarding the new 42-inch AIM pipeline near Indian Pont.[67] The petitioner requested that the NRC take enforcement action against Entergy for violating regulations at 10 CFR 50.9, "Completeness and accuracy of information," 10 CFR Part 50, Appendix B, "Quality Assurance Requirements," and 10 CFR 50.59. As part of the petition, the petitioner also raised concerns regarding the NRC's inspection, oversight, and the precise handling of several portions of his petition.[68] In January 2015, the petitioner met with the Petition Review Board (PRB) and presented his concerns.[69] Over the course of several months, the petitioner continued to supplement his petition with additional information and pursue additional insights through requests for agency documents.

In April 2015, the petitioner received documents from the NRC that, in his view, supported the petition's assertion that a material false statement was made with respect to Enbridge's ability to close the AIM pipeline isolation valves in three minutes. During a July 2015, PRB meeting, the petitioner and PRB discussed this additional information and agreed that the petitioner would submit any remaining concerns in writing.[70] Those 39 questions were submitted later in July.[71] In September and November 2015, the NRC rejected the 2.206 petition and provided responses to the 39 questions, respectively.[72]

3.1. Summary of the Current 10 CFR 2.206 Process

The 2.206 petition process allows the public and other interested stakeholders to request enforcement action against NRC licensees and license activities.[73] Subsequent to the October 2014 petition review described above, the process for reviewing 10 CFR 2.206 petitions was updated in March 2019.[74] The current implementation of the 2.206 petition process is established in Management Directive 8.11.[75] Additional guidance is available in a desktop guide.[76] Overall process flowcharts from the desktop guide are reproduced as Figure 9 and Figure 10 of this report.

Under most circumstances, a 10 CFR 2.206 petition review begins with a written request submitted to the EDO. The written request identifies the licensee, the activity, the enforcement action requested, and supporting evidence.[77]

Then, the NRC establishes a PRB to review the petition. The PRB is generally composed of a chairperson (a Senior Executive Service manager), the office 2.206 petition coordinator,[78] a petition manager, cognizant management and staff, a regional representative (branch chief or higher), a representative from the Office of Enforcement, and a representative from the Office of the General Counsel.[79] The PRB or the petition manager initially determines whether immediate action is necessary based on the safety or security issue raised by the petitioner; if so, the NRC pursues that action before taking further action to disposition the petition. If immediate action is not necessary, the PRB will prepare for an initial meeting that will include (1) a discussion of the safety significance, (2) a discussion of immediate actions taken (or needed, if new information has arisen since the initial determination), (3) a recommendation concerning referral for investigation, and (4) a proposed schedule.[80] At the initial meeting, the PRB also assesses whether the petition meets the acceptance criteria in Management Directive 8.11, could be consolidated with other petitions, or should be held in abeyance.[81]

In determining whether a petition should be accepted, the NRC first determines whether the petition specifies facts that support the requested action.[82] Second, the NRC determines that petition does not raise an issue that was previously resolved in a facility-specific or generic review. If the issue had been raised before, the PRB must determine (to accept the petition) that the specific issue was not resolved, the resolution does not apply to the current facts, or the petition provides

significant new information[83] that was not previously considered. After evaluating the petition against the acceptance criteria, the PRB will inform the petitioner of its assessment prior to a meeting and offer the petitioner an opportunity to meet with the PRB.[84]

Should the petitioner decide to meet with the PRB, the meeting will normally be conducted as a public meeting.[85] The meeting is an opportunity for the petitioner to provide any relevant additional explanation and support in light of the PRB's initial assessment. During the petitioner's presentation, the PRB members may ask questions to help clarify the assertions and concerns. The licensee is invited to participate but does not formally present.

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After considering any new information, the PRB will make an initial determination to either accept or reject the 2.206 petition. If the petition is rejected (as was the case for the October 2014 petition discussed above), the PRB issues a closure letter to the petitioner that explains why the petition was not accepted, acknowledges the petitioner's efforts in bringing issues to the staff's attention, explains any immediate actions taken, notifies the petitioner if the issue is being referred to another NRC program or process, and responds to the issues raised in the petitioner's request.[86] If the petition is accepted, a letter is sent informing the petitioner, and the petition review proceeds to a Director's Decision.[87] On its own initiative, the Commission may review the Director's Decision within 25 days of the date of the decision.[88]

3.2. Observations on October 2014 Petition Review

In his October 2014 request for enforcement action against Entergy, the petitioner asserted that Entergy's assumption regarding the time to isolate the new 42-inch natural gas transmission pipeline was mistaken.[89] He further asserted that the agency should not have accepted this 3-minute closure time and that Entergy knew the information was materially inaccurate or incomplete. The petitioner also challenged the licensee's and NRC's use of the Areal Locations of Hazardous Atmospheres (ALOHA) modeling software to model a postulated pipeline explosion.[90] The petitioner also raised concerns regarding the use of Regulatory Guide 1.91 and what he viewed as the staff's deviation from the guidance. The petition also questioned the quality assurance process used by the agency for its analysis of the AIM pipeline hazard.

During the NRC's evaluation of the petition, the PRB met with the petitioner twice to discuss the underlying facts, and the petitioner's concerns. Ultimately, the PRB determined the petition could not be accepted because the NRC had previously evaluated the concern.[91] To reach that conclusion, the PRB requested technical staff to conduct additional analysis.[92] The additional analysis was not thoroughly documented (Figure 11 and Figure 12 in this report are examples of handwritten sketches and results). As a result, the results were difficult for the PRB to review or verify, as indicated in interviews conducted by the team.

The team observes that the timing of the petition closure appears to be unusual, with the petition rejection occurring in September 2015 while the petitioner still had questions and concerns outstanding. The PRB promised to provide a response to his concerns at a later date and did so in November 2015. The team notes that the petitioner was planning "drop-in" meetings with members of the Commission[93] in September 2015, so there may have been urgency to resolve the petition.The PRB promised to provide a response to his concerns at a later date and did so in November 2015.

3.3. Team's Conclusion on 10 CFR 2.206 Petition Review Decision

Based on the guidance that was used to conduct the 10 CFR 2.206 petition review, the team concludes that the PRB appropriately dispositioned the petitioner's concerns. Under that guidance,[94] a petition could be rejected because:

> The petitioner raises issues that already have been the subject of NRC staff review and evaluation either on the cited facility, other plant facilities, or on a generic basis, for which a resolution has been achieved, the issues have been dispositioned, and the resolution is applicable to the facility in question.

The PRB's evaluation that the petitioner's concerns had been resolved in a prior staff review (i.e., the inspection report) met the criterion for rejecting a petition. The team's analysis, discussed in Section 2, provided additional information that supports the previous conclusions by Entergy and the NRC. The team does not recommend that the NRC reopen the 10 CFR 2.206 petition.

Nonetheless, the team observes that the PRB process could have been more rigorous, questioning, and well-informed about prior agency reviews. The OIG Event Inquiry identified some areas of concern with respect to the agency's analysis and communications with the petitioner. Recommendations to improve the 10 CFR 2.206 process are presented in Section 4.3.

4. Conclusions Regarding NRC Processes

During the review of the safety analysis, the 10 CFR 50.59 inspection, and the 10 CFR 2.206 petition, the team identified processes that could be improved. Four concern internal NRC processes and procedures, and one concerns NRC interactions with outside entities. For the four internal issues, the agency should (1) improve certain NRC technical work products, including peer reviews; (2) clarify guidance for regional inspection support by headquarters; (3) improve and clarify the 10 CFR 2.206 petition review process; and (4) update guidance for pipeline hazard analysis. In addition, a procedure should be developed to guide coordination between the NRC and other agencies to ensure clear documentation, communication, and consideration of agency needs.

4.1. Recommendation – Improve Certain NRC Technical Work Products, Including Peer Reviews

In March 2020, NRR revised its office instruction ADM-405, "NRR Technical Work Product Quality and Consistency."[95] This office instruction provides guidance for technical work products to meet expectations for quality. It specifies when peer reviews should be conducted, the qualifications for staff performing per reviews, the time and effort needed to perform an adequate peer review, and how to resolve peer review comments. The team identified these areas as weaknesses during interviews with those involved in the peer reviews of the NRC analyst's two main calculations. It appeared that the reviewer was identified almost by accident and was given little direction on what was expected. The resulting reviews were brief and, in the first instance, much more focused on the licensee's work than the analyst's given the responsibility of the licensee under 10 CFR 50.59.

The NRC staff and supervisors interviewed by the team uniformly expressed a lack of familiarity with the previous versions of this office instruction. Therefore, the team recommends that the roll-out of the new office instruction have a robust communication plan to ensure that technical staff and supervisors are familiar with the requirements. The team observes that training slides have already been prepared to accompany the issuance of the guidance.[96] **The team recommends that NRR consider how this guidance will be reinforced for new staff or supervisors who did not participate in training when the guidance was updated.** The team also notes that this guidance is specific to NRR. **Other offices may want to consider whether their peer review procedures provide for appropriate scope, process, and qualifications. The agency should consider implementing continuing training requirements for branch chiefs, other supervisors, and senior leaders on technical work product quality and consistency.** The continuing training requirements would ensure consistent work across the agency and supervisors. It would support NRC leaders as they transition to new positions and may become responsible for independent or confirmatory analysis.

The team also observed more generally that some of the challenges it documented in this report resulted from the NRC's decision, on multiple occasions, to conduct detailed analyses that required the NRC analyst to make critical assumptions. This approach appears to be unusual during inspections or petition reviews. Confirmatory analyses can be useful or even essential in supporting NRC decisions, if they are properly documented. When staff are faced with unusual or complex situations, however, conducting a confirmatory analysis may cause confusion. Conducting a rigorous and well-documented review of the licensee's work, or comparing a licensee's results to simpler rules of thumb, may be preferable. **The team recommends that the NRC give staff better guidance on when confirmatory analyses are necessary or appropriate.**

Finally, the team observed that the ways the NRC staff documented their analyses opened the door to later challenges. For example, calling an assumption "conservative" or "bounding" can be refuted

if others' calculations yield different results. It may be advantageous to make realistic or reasonable assumptions and document the basis appropriately. In addition, some important analysis documents are undated or do not designate who conducted the analysis. This makes follow-up questions related to these documents very challenging. Additional discussion on documenting decisions under the 10 CFR 2.206 process is provided in Section 4.3.4 below.

4.2. Recommendation – Clarify Guidance for Regional Inspection Support by Headquarters

The analyses that became the focus of the OIG Event Inquiry originated in a request for technical support from Region I. The regional inspection staff knew that this particular 10 CFR 50.59 evaluation would be of high interest and made, in the team's view, an appropriate decision in selecting it as a sample for their baseline "modifications" inspection. The onsite inspections and document reviews appear to have been thorough and reasonable. Furthermore, the team views favorably the region's decision to request technical support from headquarters to help review the licensee's unusually complex 10 CFR 50.59 evaluation.

The weakness of the inspection, in hindsight, was that Region I did not document its request for headquarters support through a document such as a Task Interface Agreement.[97] The relevant office instruction clarifies when such agreements are suitable and when an informal teleconference or email would suffice.[98] While the full Technical Interface Agreement process may not be warranted in all cases when inspectors need technical support, the team finds that better explanation and documentation would improve outcomes.

Inspectors should give technical experts supporting inspections appropriate context to support their review. The team heard from multiple individuals that inspectors focus on whether the licensee violated regulations and whether significant issues are found in the licensee's work. Inspectors are not reviewing and endorsing all aspects of a licensee's work. (In the case of a 10 CFR 50.59 inspection, the conclusion is whether the licensee appropriately determined that no prior NRC review is needed.) This approach contrasts with licensing reviews, in which NRC technical reviewers make an affirmative finding that an application or request meets requirements. Technical experts who are used to one approach may need orientation before using a different approach.

Inspectors should document specific focus areas for technical experts supporting inspections. The inspector may want to pose specific licensing or technical questions. The inspector may also have identified concerns or uncertainties with specific aspects of a licensee analysis that should be checked by confirmatory calculations. Reproducing a full licensee analysis is likely not necessary to make the conclusions expected during an inspection. The inspector should define the expected level of effort, timeframe, and response format at the beginning of the activity.

Therefore, **the team recommends that the NRC develop guidelines and good practices for inspectors and technical experts to use in arranging formal and informal technical support**. Such guidelines would also be referenced whenever technical support is needed, so that the inspector and the technical expert can reach agreement on expectations.

4.3. Recommendation – Improve and Clarify the 10 CFR 2.206 Petition Review Process

The team identified several areas where the 10 CFR 2.206 process should be further enhanced, as described in the subsections below. These enhancements should be included in the next update to the process guidance (either the Management Directive or the desktop guide).

4.3.1. Modernize Petition Review Boards

The team recommends that PRBs be improved by designating standing members for certain roles. Under the current process, membership in PRBs is an ancillary duty for each participant. PRB members interviewed by the team said that PRBs do not always have the expertise, ownership for the process, or the experience to effectively manage and tailor the process to the petition's underlying facts.

Under the current process, a PRB is established for each petition. For example, the PRB chair rotates through senior managers from the appropriate office. This rotation of leadership and participation can mean that leadership and staff do not develop a deep understanding of the process. This may result in some PRB members feeling bound by the process and unlikely to challenge assertions or exercise the appropriate questioning attitude.

The ancillary nature of the responsibility can make the petition process less efficient, discourage process improvements, and potentially suppress a questioning attitude. Efficiency is particularly harmed if PRB members are conducting the process for the first time or relearning the process after a long time. This may result in a focus on applying the process that discourages departures even when warranted, if PRB members cannot judge why certain procedures are in place and when procedures should be modified or are unnecessary. PRB members may not raise issues if they are concerned about being the lone holdout preventing others from returning to their main responsibilities.

4.3.2. Provide for Independent Petition Reviews

The team recommends that PRB members and support staff be independent from any previous substantive work on the issues raised in the petition. As noted above, one criterion for rejecting a petition is that the issue raised by the petitioner has been previously resolved on a facility-specific or generic basis. The desktop guide states that "[o]ffice management should avoid potential conflicts of interest when assigning staff and a chair to the PRB."[99] Several staff members associated with the review of the October 2014 petition were involved in the recently completed inspection of the licensee's 10 CFR 50.59 evaluation. This included the technical reviewer and the petition manager. The guidance and process applicable to that petition did specify that conflicts of interest should be avoided. It, however, did stress the importance of conducting an independent technical review.[100]

In this case, the technical reviewer was effectively tasked with determining whether the issues raised by the petitioner had been previously resolved through a facility-specific review. The petition was ultimately dispositioned based on a previous resolution that relied on the previous work of the technical reviewer. Because he was tasked with reviewing the petitioner's assertion, he faced an intractable problem. If he determined that the petitioner raised a valid issue, he would have had to determine that he erred in his earlier work. Simultaneously, the petition manager also served as the licensing project manager for Indian Point Units 2 and 3. He also would have had some familiarity with the licensee's 10 CFR 50.59 analysis and the NRC inspection. He, also, would have needed to determine that his prior involvement had failed to identify a problem with the licensee's actions.

This petition review also exposed that for certain skill sets, limited expertise is available internally to the agency. This weakness limits the agency's ability to assign staff as peer reviewers of agency calculations and independent reviews of agency decisions. The team's views on peer reviews are presented in Section 4.1.

The lack of independence and depth may cause concerns among petitioners, members of the public, and other interested stakeholders. Petitioners may remain concerned that petition reviews are not sufficiently rigorous. Licensees may worry that an issue will be raised over and over, occupying increasing resources and time by the NRC.

In the future, the NRC should ensure that the PRB members and support staff are independent of any previous facility-specific or generic disposition of the issues raised in the petition.

4.3.3. Take a Graded Approach to the Detail of Petition Reviews

After reviewing the events for this petition and interviewing many of the members and participants in this PRB, the majority believed that the petition should have been accepted and proceeded to a Director's Decision. Most, however, indicated that at the time it was difficult to understand how much additional work and analysis the staff was contemplating. The process proceeded iteratively with the petitioner supplementing his petition and seeking further information from the staff. As a result, the PRB may have perceived at each iteration that only a little extra work was needed. In hindsight, the PRB performed a significant volume of work to determine that the petition would not be accepted.

During the team's evaluation, a theme developed with respect the staff perception of the 10 CFR 2.206 process and the level of effort required for different aspects. The staff considers the work necessary to effectively participate in the 2.206 petition process to be considerable. That level of effort increases if a petition is accepted and proceeds to the Director's Decision. Despite this additional effort, a prior NRC staff analysis found that many 10 CFR 2.206 petitions *are* accepted and *do* result in NRC action, even if the specific actions requested by the petitioner are not taken.[101]

The team recommends that PRBs adopt a graded approach to the detail of review conducted at each petition review stage. If a PRB needs new analysis or lengthy discussions to decide whether to accept a petition, the petition should be accepted and that work should be done in preparing the Director's Decision. This approach would support proper documentation of the analysis, as discussed in the next section, and professionalizing PRBs, discussed earlier, would limit individuals' perceived disincentives.

4.3.4. Document Analysis Supporting Petition Decisions

The team recommends that any analysis or calculations used to support a 10 CFR 2.206 petition decision should be rigorously documented. This documentation is even more important when it is relied on in a decision to reject or deny a petition.

In the case of the October 2014 petition, the calculations used by the PRB to make its decision appear to consist of print-outs of ALOHA runs and hand calculations, with only one analysis being documented in a short undated summary that included scanned sketches and handwritten notes. These calculations appear largely to have been retained only by the technical reviewer, who provided his only copy to the OIG during its event inquiry.[102] Because these calculations formed the basis of the PRB's justification to reject the 10 CFR 2.206 petition, they should have been more formally captured and made publicly available where possible. When shared with the PRB, Federal records requirements would have also applied to what may formerly have been personal notes.

Calculations need to be appropriately performed, documented, and reviewed. The work needs to be retained in a retrievable form and drafted in a manner that would support a full understanding of the calculations that were performed, including any assumptions and engineering judgment, and make the work repeatable.

4.4. Recommendation – Update Guidance for Pipeline Hazard Analysis

The team recommends that the NRC review and update Regulatory Guide 1.91 to address several technical issues that the team identified and to enhance the review process for pipeline hazards. Regulatory Guide 1.91 was updated in 2013 to reflect gas pipeline hazards for the first time, based on approaches that the NRC staff had previously found acceptable. Regulatory Guide 1.91 should be revisited in an independent review to ensure its guidance reflects generically acceptable approaches for evaluating gas pipelines near nuclear power plants. The team has identified several specific technical issues in the following paragraphs that should be considered. The team reviewed other licensee or applicant analyses that referenced Regulatory Guide 1.91 and found that, in general, bounding assumptions were made. The team considers that those conclusions would likely still be valid even if Regulatory Guide 1.91 were updated to account for these issues.

As discussed in Section 5.1.6 of this report, Regulatory Guide 1.91 provides a formula to calculate the minimum safe distance by evaluating a potential explosion at the source based on the amount of explosive in terms of trinitrotoluene (TNT) equivalent. Beyond the minimum safe distance, no adverse effect would occur. That safe distance is proportional to the cube root of the mass of the explosive in the equation (in this case, the mass of flammable gas vapor released). Regulatory Guide 1.91 assumes equipment failures at specific levels of overpressure (1 psia). The guide recommends a detailed analysis if this safe distance criterion is not met, the guide but provides no suggestions for how this analysis should be conducted. As discussed in Sections 2.2 and 2.3 presented in more detail in Appendix B, detailed calculations conducted by Sandia National Laboratories raised concerns with some of the assumptions made when considering vapor cloud explosions, particularly buoyancy and dispersion. The team recommends that the NRC provide clearer expectations for the detailed calculations that would be conducted if the safe distance criterion is not met.

Commented [LA12]: Should state that the Factory Mutual Guidelines referenced in Reg. Guide 1.91 states that the TNT equivalent model is not necessarily conservative for vapor cloud explosions.

Commented [LA13]: Should state that the Factory Mutual Guidelines referenced in Reg. Guide 1.91 does provide further guidance on conducting for detailed modeling.

Commented [CT14]: @Suzanne and @Renee could you please look at this?

A key element in these calculations is the mass of gas released following postulated pipeline rupture. The team observed a significant disparity in the calculated potential impact distances when different assumptions were used (e.g., how to account for the duration of gas release, the affected pipeline length, and the use of a yield factor as listed in Table 1 of the regulatory guide). The current revision of Regulatory Guide 1.91 does not provide clear guidance for determining the mass release. Different people can use the guidance and get very different results. Therefore, more guidance is needed on what assumptions should be made when determining the values to be used in the Regulatory Guide 1.91 formula.

The comment response associated with the draft Revision 2 to Regulatory Guide 1.91 discusses how the guide was changing from mass equivalence to energy equivalence and states that an energy equivalence (yield) "between 20% and 40% is recommended for hydrocarbons."[103] The comment response then goes onto to state that since the guide is not only for hydrocarbons, so values between 5 percent and 100 percent are recommended. This additional detail on appropriate yield values would be a beneficial addition to the guide. The team also noted that Reference 9 of the guide does not include information about different classes of unconfined vapors and recommend more guidance be added on how vapors should be classified.

In addition, the team recommends updating the TNT-equivalent equation in Regulatory Guide 1.91 to revert to the 4500 kJ/kg value that had been included in the draft Revision 2, as discussed below in Section 5.1.6.

Finally, Regulatory Guide 1.91 provides no guidance on heat flux, which is the subject of Department of Transportation regulations and, to some pipeline experts, is the controlling issue for

nuclear power plant impacts. This aspect should be addressed in an update to Regulatory Guide 1.91.

4.5. Recommendation – Formalize Coordination with Other Agencies

4.5.1. Documentation of Coordination

The team recommends that the NRC improve documentation of its interactions with other agencies, particularly when NRC expertise or decisions will be cited by the other agency.

As noted in Section 1.2.3, the NRC shared the results of its 10 CFR 50.59 inspection with FERC staff in an October 2014 teleconference.[104] The team interviewed several staff that the FERC had identified as participating in that meeting. Only one recalled the teleconference in any detail. This recollection was consistent with the OIG Event Inquiry statement that the NRC "did not provide calculations to FERC but talked them through the inspection report." The team reached out to the FERC and found that the FERC engineer who participated in the meeting had left the agency and the environmental contractor was no longer under contract. Also, the team's interviews with NRC staff indicated that the NRC licensing project manager for Indian Point had additional informal telephone conversations with FERC representatives, though the team could not find documentation of these conversations and did not interview the now-retired project manager.[105]

The team, therefore, was able to develop its views on the NRC-FERC interactions based only on what is in the public record. The NRC appears not to have provided any formal correspondence to the FERC beyond the September 2014 comment on the draft environmental impact statement. The OIG Event Inquiry states that "two FERC headquarters-based engineers assigned to the AIM Project revealed that FERC used NRC's November 7, 2014, inspection report for its [environmental impact statement] and FERC's Commission relied heavily on NRC's expertise to determine if [Indian Point] could be safely shut down in the event of a pipeline accident, for approval of the portion of the AIM Project that crossed [sic] [Indian Point] property."[106]

It is unclear whether the NRC provided any regulatory context for its review to the FERC in the October 2014 teleconference. The team views that the FERC would have benefited from a clear understanding of what findings Entergy was making in its 10 CFR 50.59 analysis, what findings the NRC was making in its inspection report, and how those findings differed from what might be done in a full licensing review. The FERC could also have benefited from a richer understanding of the analyses of the preexisting pipelines (which were mentioned in the October 2014 teleconference).

The team is not suggesting that FERC would have made different conclusions based on this information, but the NRC and FERC positions would have been clearer and better documented.

4.5.2. Formalization of Coordination

The team recommends that the NRC clarify guidance for when it should participate as a cooperating agency in other agencies' environmental reviews, as well as how it should engage with Federal or state agencies more generally.

The NRC policy for intergovernmental consultation[107] applies to "major interagency agreements, major organizational changes, major rules and regulations, statements of policy, guides, and standards, and major studies that may have a significant State or local impact." It specifically excludes "[c]onsultation with state officials and Federal agencies on individual licensing and enforcement decisions." The team did not identify guidance applicable to the NRC-FERC interactions described in this report.

For its own environmental reviews, the NRC considers during the scoping period whether there should be cooperating agencies.[108] Based on discussions with the environmental center of expertise, the team found that a memorandum of understanding is usually developed to describe the respective responsibilities, jurisdictional authorities, and expertise of each agency within the context of the applicable review. The memorandum also establishes a schedule and deliverables for the NEPA review. The NRC's document database includes multiple formal letters between the NRC and other agencies, inviting one party or another as cooperating agencies and accepting such invitations. For example, the NRC and the U.S. Army Corps of Engineers executed a memorandum of understanding in 2008 that establishes the Corps as a cooperating agency for NRC environmental reviews related to the issuance of authorizations to construct and operate power reactors.[109]

No such formality appears to have been applied to the FERC review of AIM pipeline. As noted in Section 1.2.3, the NRC declined to be a cooperating agency in FERC's environmental review and communicated this decision in an April 2014 teleconference between the FERC and NRC environmental and intergovernmental liaison staff. It is unclear what the basis for the NRC's decision was. In an interview with the team, the manager responsible for the intergovernmental liaison function at the time did not recall the exact reason but suggested that the NRC may have wished to focus on plant impacts rather than getting involved in the environmental impacts of the pipeline. The team observes that a more formal coordination such as a memorandum of understanding or cooperating agency status could have prompted both agencies to engage in the formal communications recommended in the previous section.

Therefore, the team concludes that additional guidance for interactions with both Federal and state agencies on specific matters would be beneficial to the NRC staff. The State Agreement and Liaison Programs Branch in the Office of Nuclear Material Safety and Safeguards may already have resources that would be helpful in this area. Additional information on cooperating agency activities can be found in the "One Federal Decision" memorandum of agreement for environmental reviews.[110]

5. Review of Key OIG Findings

5.1. Key Findings Related to NRC Analysis

The team reviewed key aspects of the OIG findings related to prior NRC analyses as described below. Many of these subjects are also addressed elsewhere in the report, but they are collected here for ease of reading, with cross-references to other sections.

5.1.1. Was use of ALOHA inappropriate?

The "Findings" section of the OIG Event Inquiry stated that "NRC's underlying independent analysis was conducted using a computer program that the National Oceanic and Atmospheric Administration (NOAA), which developed the program, said it was not designed for." OIG also noted that the staff did not conduct a verification and validation of the ALOHA code.

ALOHA performs calculations for chemical source terms and resulting downwind concentrations. Source term calculations determine the rate at which the chemical material is released to the atmosphere, release duration, and the physical form of the chemical upon release.

The ALOHA code allows for modeling the accident scenarios for gas release from a pipe source. The pipe source configuration represents gas discharges from a long pipe either (1) connected to a very large (infinite, for analytical purposes) reservoir or (2) isolated at its unbroken end. The analyst must specify a gas temperature and pressure are specified, along with pipe length and diameter and whether the surface is smooth or rough.

ALOHA uses the pipe length to predict the discharge rate from a ruptured pipeline. The length-to-diameter ratio of the pipe must be at least 200. The rupture area may be a size up to the cross-sectional area of the pipe.

ALOHA can model two different types of scenarios for a gas pipeline failure. The two types of scenarios differ in the state of the unbroken end. For the isolated scenario, a finite amount of gas is in the pipeline section. As gas is discharged at the broken end, the pressure drops, and the discharge rate slows over time. The release occurs over a finite time. For the infinite-reservoir scenario, pressure and discharge rate remain essentially constant, and the release occurs for an indefinite time.

In using ALOHA, the source duration is specified as either instantaneous or continuous. A continuous release refers to any duration lasting longer than a minute. ALOHA assumes an instantaneous release to last one minute. For an instantaneous release, the total quantity (mass or volume) released into the air is the residual gas mass in the pipeline (i.e., until the finite length of pipeline is emptied). For a continuous release, the mass or volumetric release rate is specified as well as the duration in minutes. The allowable input range for the duration is between 1 and 60 minutes. ALOHA calculates time-dependent release rates for up to 150 time steps. ALOHA then averages the release rates from the individual time steps over one to five averaging periods, each lasting at least one minute. The five averaging periods are selected to most accurately portray the peak emissions. ALOHA provides several results, including a 1-minute maximum release rate of mass and a total release of mass.

Based on its review of the above discussions, the team agrees with the OIG comment that ALOHA does not have the capability to model the scenario of manual closure of the isolation valves within 3-minutes. In addition, ALOHA cannot directly model a double-ended break where the pipe has broken in the middle and is leaking from both broken ends. The model can calculate the release from one side of the pipeline, but not both sides together. In addition, ALOHA does not model

supercritical flow which is applicable to this pipeline rupture release scenario. Therefore, the team agreed that there are concerns with using the ALOHA model to assess the Indian Point postulated pipeline rupture scenario. With support from experts at the Sandia National Laboratory, an independent analysis was performed to assess the postulated 42-inch pipeline rupture scenario. A summary of that analysis result was provided in Section 2 of this report.

5.1.2. Was the correct area analyzed?

The "Findings" section of the OIG Event Inquiry stated that "the majority of NRC's independent analysis described the impact of a potential rupture on an above ground point on [Indian Point] property that NRC believed presented the most credible risk due to its exposure; however, ultimately the as-built 42-inch pipeline does not come above ground anywhere on [Indian Point] property but does traverse the [Indian Point] property."

During multiple interviews with the review team staff, the analyst stated that he performed calculations for breaks postulated at two locations on the 42-inch pipeline: (1) at the above-ground "tie-in" east of Indian Point and (2) an underground middle section at the closest location to safety-related SSCs on site. The analyst also stated that he presented the results of the first case in his report, because he determined that it was the bounding case for assessing the postulated pipeline failure at Indian Point site.

The team determined that these locations were appropriate for evaluation. The difference between below-ground and above-ground breaks would not alter the effects of the pipeline explosion according to the team's PHMSA member and the team's interview with an independent gas pipeline expert. Additionally, the change in location was 21 feet, which would not have altered the conclusions of either Entergy or the NRC analyst.[111]

The team observes that the NRC did not reinspect or reanalyze the 2015 revision to Entergy's 10 CFR 50.59 evaluation. Since the change was relatively minor, the team considers that this would generally be a reasonable approach, enabling staff to focus on more significant change. In this case, however, since Entergy submitted the change at the peak of the NRC activities regarding the 10 CFR 2.206 petition (including reanalysis), it would have been helpful to review and document the change for completeness.

5.1.3. Were analyses documented properly?

The "Findings" section of the OIG Event Inquiry stated that managers had "differing understandings of the assumptions and factors driving the analysis" and that the analyst "did not have a basis" for engineering judgments and "did not document a basis or a methodology in [the analyst's] report."

The analyst documented his original calculation in October 2014, and Region I used it as a feeder to the inspection report issued in November 2014.[112] The analyst assumed a pipe rupture equivalent to the diameter of the pipe at a maximum operating pressure of 850 psig. The pipeline rupture was assumed to occur at the far end of the pipeline where the pipeline rises above ground level, releasing the full volume of gas within the 3-mile length of pipeline between the nearest isolation valves. Also, the analyst assumed that the isolation valves would be closed in 3 minutes. The ALOHA calculation for this scenario resulted in a maximum sustained methane release rate of 256,000 lb/min and estimated a total release amount of 354,651 pounds averaged over 9 minutes. The analyst assumed the maximum release over 1 minute (256,000 pounds of methane) and determined the TNT-equivalent (W_{TNT}) amount with a yield factor of 0.05. By using the Regulatory Guide 1.91 formula, the analyst determined that the minimum safe distance—beyond which there would be a less than 1 psi overpressure—was 2351 ft. The analyst noted that the pipeline at the far end above ground is located 2988 ft from the nearest safety-related SSCs within the SOCA. In

addition, the analyst noted that some SSCs designated as important to safety outside the SOCA were closer to the pipeline than 2351 feet, so those SSCs may experience greater than 1 psi overpressure and would be impacted. Furthermore, the analyst noted that a detailed discussion of the impact of these important-to-safety SSCs, which was reviewed by NRC inspectors, is included in the licensee's August 2014 10 CFR 50.59 evaluation.[113]

Subsequently, during the 10 CFR 2.206 petition review, there were concerns about whether remote pipeline operators would be able to recognize that a pipeline rupture occurred and then take timely actions to close the nearest pipeline isolation valves within 3 minutes. As a result, the analyst performed additional ALOHA modeling was performed as a sensitivity study to determine the significance of valve closure times.[114] (Section 4.3.4 of this report provides additional information on the documentation of these calculations.) The original scenario, modeled as discussed in the paragraph above, assumed a maximum 1-minute release in determining the minimum safe distance and the potential heat flux due to a jet fire. In the infinite-source scenario, the analyst assumed that the pipeline isolation valves do not close and gas continues to flow, as if there was an infinite source, for 60 minutes. The analyst stated that the maximum calculated release of natural gas determined by the ALOHA model for the infinite-source scenario only slightly varied from the prior analysis, and the calculated results were marginally changed. The distance that would be subject to a 1 psi overpressure increased, but the distance remained lower than the distance to the most limiting SSC inside the SOCA boundary. Therefore, the analyst concluded that pipeline isolation valve closure times were inconsequential. He continued to support the original conclusion that the 42-inch AIM pipeline at the Indian Point site does not represent an undue risk and that the plant could safely shut down following a postulated pipeline rupture.

The team noted that the analyst stated that it was conservative to use the 1-minute maximum gas release rate (rather than total mass released over the assumed duration) from ALOHA for both the 3-minute scenario and the 60-minute infinite-source scenario. However, the analyst did not provide a documented technical basis to justify the conservatism of that assumption. Therefore, the team was not able to confirm the validity of the analyst's conclusion that the pipeline closure times only minimally changed the peak overpressure calculation and the heat flux calculation.

5.1.4. Were pipeline enhancements credited appropriately?

The "Findings" section of the OIG Event Inquiry referenced statements by managers that suggested "backwards engineering" occurred when pipeline enhancements were increasingly credited and that the "use of credit for enhanced piping was inappropriate."

During multiple interviews with the team, the analyst stated that he only considered credit for the enhanced pipeline during his thought process for assessing the impact from postulated pipeline failures near Indian Point. He noted that at the closest point to the plant, the pipeline is thicker, is buried deeper, and is physically protected by reinforced concrete mats. Nevertheless, the analyst stated that he did not credit any pipeline enhancements were credited in the calculation documented in his report. Therefore, the team did not substantiate the findings in the OIG Event Inquiry related to enhanced piping.

The team also notes that pipeline enhancements such as thicker diameter, corrosion coating, concrete pads above the pipeline, warning signs to inform potential excavation, and deeper burial may reduce the likelihood of a failure, as discussed in Section 2.1.1. In addition, the team noted that the Indian Point site topography may influence the consequence of postulated pipeline ruptures. Specifically, the pipeline elevation is above plant grade but below the crest of a hillside overlooking the plant, as indicated in Figure 5. As a result, a portion of the jet flame would be absorbed by the hill, providing less energy available to heat structures onsite. The most likely spot for an explosion

would be near the postulated pipeline rupture location, as it would have the highest concentration of natural gas, assuming an ignition source was present or generated by the explosion. If the explosion were to occur in this location, a portion of the blast energy would be absorbed by the hillside surrounding the pipeline. For a blast to occur father away from the pipeline, the gas would need to remain in an explosive concentration.

5.1.5. How was the time needed to isolate the pipeline considered?

The "Findings" section of the OIG Event Inquiry raised issues with the assumption that pipeline isolation would occur in 3 minutes, noting that the pipeline operator "estimated it would take at least 6 minutes after the detection of a leak to close the valves." OIG noted inconsistencies understandings of the amount of gas that would be released.

The analyst originally assumed that the isolation valves for the pipeline could be closed in 3 minutes. As noted above in Section 5.1.3, however, the analyst performed a sensitivity study to support the 10 CFR 2.206 petition review. In the second scenario, the analyst assumed that following a complete pipeline rupture, the pipeline provides an infinite source of natural gas and the pipeline isolation valves do not close for an hour.

The team verified that ALOHA does have the capability to assess 60 minutes of gas release from an infinite source, as well as the gas released in the first minute. However, the team noted that analyst used the 1-minute maximum gas release rate (rather than total mass released over the assumed duration) from ALOHA for both the 3-minute scenario and the 60-minute scenario assessed. As discussed in Section 5.1.3 of this report, the analyst did not provide a documented technical basis to justify the appropriateness or conservatism for that assumption. Therefore, the team was not able to confirm the validity of the conclusion that the pipeline closure times only minimally changed the peak overpressure calculation and the heat flux calculation.

As discussed in Section 2.1.3, the team found conflicting information on the time it would take to isolate the ruptured pipeline and where the isolation would occur. As a result, as noted in Section 2.6, the team recommends that the NRC ask Entergy to revisit its 10 CFR 50.59 evaluation to apply an appropriate isolation timeframe or justify why the timeframe is not relevant.

5.1.6. Was Regulatory Guide 1.91 used correctly?

The "Findings" section of the OIG Event Inquiry stated that "NRC used a draft regulatory guide in lieu of the final, approved version (which had been issued approximately 2 years prior) and deviated from the approved version in a manner that was less conservative and had an impact on the analysis outcome."

The OIG Event Inquiry referenced the analyst's use of 4500 kJ/kg instead of 4420 kJ/kg for the denominator in Equation 4 of Regulatory Guide 1.91. The team found that the denominator used in the reference[115] where this equation originated is 4500 kJ/kg. In further discussions with fire experts in the Office of Nuclear Regulatory Research, the team verified that this 4500 kJ/kg value is appropriate and consistent with fire and explosion literature. It appears that the more precise value may have come from conversions between English and metric units, but it is not applied elsewhere in the literature. Therefore, the team found the analyst's use of this value acceptable, even though it did not match the latest revision of Regulatory Guide 1.91. The team recommends that a future update to Regulatory Guide 1.91 should revisit the change made in that denominator.

Additional recommended improvements to Regulatory Guide 1.91 are discussed in Section 4.4 above.

5.2. Key Findings Related to NRC Processes

5.2.1. Did FERC's approval represent the NRC analysis appropriately?

The "Findings" section of the OIG Event Inquiry stated that "NRC's independent analysis was incorrectly portrayed in FERC's approval document as significantly more conservative than it actually was."

The FERC issued its approval order for the AIM pipeline in March 2015.[116] Section k.2. of this order addressed safety issues related to Indian Point, and in paragraph 107, the FERC described the NRC's review. The team considered the accuracy of the FERC's approval order paragraph 107 as follows.

- **"The NRC reviewed the site hazards analysis performed by Entergy and performed an independent confirmatory analysis of the blast analysis as well."** The team agrees with this statement (while acknowledging the analysis could have been conducted differently, as discussed elsewhere in this report), and it is consistent with the NRC inspection report.
- **"The NRC's analysis did not account for the additional pipeline design measures identified by Entergy and committed to by Algonquin ..."** The team agrees with this statement. As discussed in Section 5.1.4 above, the NRC analyst did consider the pipeline enhancements but did not use them in his pipeline rupture consequence calculation.
- **"[The NRC's analysis ...] assumed a pipeline catastrophic failure."** The FERC uses a term "catastrophic" that is not included in the original October 2014 NRC analysis or November 2014 NRC inspection report. The term appears to have been introduced in the October 2014 NRC-FERC meeting summary. [117] The team considers that given the discussion in that analysis of a "hole equivalent to the diameter of the pipe" (i.e., a full guillotine break), the failure itself could be described as catastrophic for the pipeline. The team does not view this use as implying a catastrophe in terms of consequences.
- **"The review covered everything within the Security Owner Controlled Area, which encompasses everything inside the outermost fenced area of the facility including the area with the spent fuel rods."** This description of the SOCA, which also appeared in the October 2014 NRC-FERC meeting summary, could be viewed as inaccurate. The "outermost fenced area of the facility" could be read as the entire Entergy property, which is fenced, with a drive-up security post at the entrance. The SOCA encompasses a smaller area. It includes, among other things, the safety-related equipment, the spent fuel pools, and the spent fuel dry storage area. The Entergy and NRC analyses did consider equipment both inside and outside the SOCA, as well as equipment outside Entergy property (such as the switchyard). Therefore, the team considers this statement to be acceptable even if it might be confusing.
- **"The NRC concluded that a breach and explosion of the proposed 42-inch-diameter natural gas pipeline would not adversely impact the safe operation of the Indian Point facility."** This phrasing is less nuanced than the October 2014 meeting summary[118] and uses language that the NRC had used in the November 2014 inspection report in the context of Entergy's analysis, not the NRC's.[119] In this light, the statement could be viewed as partially inaccurate. In the team's understanding, the NRC focused on (a) whether Entergy complied with 10 CFR 50.59 in deciding NRC review was not needed (as concluded in the inspection report) and (b) that Indian Point could safely shut down and remain shut down after a pipeline rupture. "Safe operation," if read as continued full-power operation after a pipeline rupture, was *not* what the NRC assumed. The team, however, does not view this distinction as distorting the overall Entergy or NRC conclusions in 2014-2015 about the safety of Indian Point.

The FERC used this information to conclude "that the project will not result in increased safety impacts at the Indian Point facility." This conclusion is consistent with the purpose of a 10 CFR 50.59 review—that hazards would remain within what was previously evaluated for the facility. In summary, while the FERC phrasing could have been more nuanced and the NRC analysis could have been conducted differently (as discussed elsewhere in this report), the team does not agree with OIG that the FERC portrayed the NRC analysis as "significantly more conservative than it actually was."

Section 4.5 above includes the team's recommendations on how the NRC can interact better with other agencies, including how the context of an NRC inspection or review could be described better.

5.2.2. Was the NRC inspection report accurate?

The "Findings" section of the OIG Event Inquiry stated that "NRC's inspection report contained inaccuracies suggesting additional analysis had been conducted, when this was not the case." The OIG Event Inquiry noted that (1) the analyst did not calculate missile generation though Regulatory Guide 1.91 suggested it, and (2) the analyst believed that effects on important-to-safety SSCs were being "bounded by more severe accidents ... already evaluated" in Indian Point's FSAR.

The team notes that Regulatory Guide 1.91 is not clear as to the scope of SSCs that should be evaluated for missiles. The guide makes a general statement that "[t]he effects of blast-generated missiles would be less than those associated with the blast overpressure levels considered in this guide." Therefore, missiles generally need not be evaluated where the overpressure levels are not exceeded—i.e., all safety-related equipment inside the SOCA, in the case of the NRC analyst's results.

The guide goes on to state that if "SSCs important to safety" are closer to the hazard than the 1 psi overpressure threshold distance, "the applicant may show through analysis that the risk to the public is acceptably low on the basis of the capability of the safety-related structures to withstand blast and missile effects associated with detonation of the potentially explosive material." The team read this passage as stating that if safety-related equipment (for these purposes, the equipment needed to safely shut down the reactor and maintain it in a safe state)[120] can be shown to be protected against blasts and missiles, the risk can be considered acceptably low. In the NRC analysis, this is the case—safety-related equipment is outside the 1-psi overpressure zone, so missiles would not be expected there.[121] Therefore, the team does not agree with OIG that a missile analysis was necessary or omitted.

Regulatory Guide 1.91 compares explosions to other natural hazards: drag pressure effects would be "much smaller than those resulting from the wind loading assumed for the design-basis tornado" and ground motion from overpressure "should be less than the vibratory ground motion associated with a safe-shutdown earthquake." The reader might draw the conclusion that these issues have been addressed uniformly for all facilities. The NRC analyst "believed" that extreme natural phenomena had already been evaluated for Indian Point and did not pursue the statement that pipe ruptures would be bounded by such phenomena. Every facility, however, has a unique licensing basis depending on when it was licensed, what requirements applied at that time, and what later requirements were imposed by the NRC.[122] The team agrees with the OIG that the analyst should not have referred to prior analyses of the facility—especially if they were not necessary as discussed in the paragraph above—without verifying the scope and results of those analyses. As noted in Section 2.1, the team could not verify that prior analyses in fact bounded pipeline impacts.

In general, however, the team observes that Regulatory Guide 1.91 is designed for licensees and applicants to use in developing their analyses of record. The NRC staff is not bound by its guidance when conducting confirmatory analyses to support inspections or licensing activities. While NRC

analyses should, as noted elsewhere in this report, be well documented and answer the questions that were asked, some aspects of the analysis may be more or less important to a given issue. The team has no serious concern regarding the specific question of whether the analyst followed Regulatory Guide 1.91 in all of its aspects.

5.2.3. Were quality standards applied appropriately?

The "Findings" section of the OIG Event Inquiry referenced remarks that the NRC does "not have a quality assurance program for these calculations, but [that] a peer review by a qualified NRC engineer was performed on NRC's independent analysis and follow-up analysis." OIG noted deficiencies with the peer review.

As discussed in Section 4.1, the team identified a weakness in the NRC's familiarity with the guidance for conducting high-quality analysis and calculations. The team identified that the agency personnel were unfamiliar with the agency guidance on peer reviews. As discussed in Section 4.3.4, documentation of confirmatory analyses and peer reviews is fundamental to assuring that calculations and peer reviews use appropriate standards, are effectively and efficiently reviewed, and support the agency's determination. The team does not consider a formal "quality assurance program" to be necessary to provide this assurance. Given the lack of staff familiarity with the quality standards that *do* exist at the NRC, the calculations analyzing the licensee's 10 CFR 50.59 analysis and supporting the PRB's decision to reject the 10 CFR 2.206 petition did not apply the appropriate standards.

The team recommends that the agency consider additional training regarding the technical work product quality and consistency. The team also recommends that the agency produce more formal documentation of technical calculations that are used to support an agency decision. These recommendations are discussed in more depth in Sections 4.1 and 4.3.4.

6. Conclusion and Recommendations

6.1. Summary of Conclusions Regarding Safety and Processes

[to be added during team/peer review after sections 2-3 are complete]

6.2. Summary of Recommendations

[to be added during team/peer review based on all recommendations]

6.3. Future Analysis and Activities

During the team's review, the team or external parties identified issues separate from those included in the Chairman and EDO taskings, particularly issues related to the preexisting pipelines discussed in Appendix A. While the team remained vigilant for issues that could pose an immediate safety concern for Indian Point, most of the issues raised could not be addressed within the scope or timeframe provided to the team. NRC management should consider whether further action by the NRC, other agencies, or Entergy is warranted to address these subjects. The team observes that, with respect to reactor safety, such decisionmaking should reflect the remaining plant operating time (mere days for Unit 2; about a year for Unit 3). A longer timeline would apply to the spent fuel, though the location of the dry fuel storage location makes it unlikely that there would be pipeline-related impacts at that site.

- On March 26, 2020, two representatives of the New York State Public Service Commission wrote to the team leads.[123] This letter included several recommendations for the team's activities, notably: (1) analysis and peer review by neutral, third-party experts (e.g., the National Academy of Sciences) and (2) a site-wide analysis of reactors and spent fuel at Indian Point that considers both the preexisting and AIM pipelines and uses updated seismic analyses. The team obtained independent membership and peer review to the extent feasible within 45 days, and its scope was focused on issues raised by the OIG regarding the 42-inch AIM pipeline. The team recommends that NRC management review the team's report and consider whether a broader analysis may be appropriate.
- On March 23, 2020, Paul Blanch (the petitioner for the October 2014 petition discussed in Section 3) wrote to the team lead with comments on the team's scope of review.[124] Mr. Blanch emphasized that a risk analysis under 49 CFR 192.917 needed to be done for the AIM pipeline. (Section 2.1.2 provides information on this risk analysis.) He also indicated that the team should address concerns he had previously raised to OIG, including NRC's use of its procedures, potentially false statements made by Entergy, processing of a prior allegation, and NRC's inspections and communications to FERC. Mr. Blanch supported calls from New York State (noted below) for an independent risk analysis reviewed by the National Academy of Sciences. Aspects of these requests were addressed by the team's activities and recommendations, as documented in this report. The team recommends that NRC management review the team's report and consider whether further evaluation is needed.
- On March 19, 2020, the Office of the Attorney General of the State of New York wrote to the NRC Chairman, FERC Chairman, and PHMSA Administrator asking for a joint evaluation of the AIM pipeline and Indian Point.[125] Specific to the NRC, this letter recommended that PHMSA and other pipeline safety experts assist the NRC in assessing the risk profile of the AIM pipeline and its proximity to Indian Point, that the NRC analyze both the preexisting and AIM pipelines and their proximity to the reactor and spent fuel, and that the NRC require a 10 CFR 50.59 review of all three pipelines. Aspects of these requests were addressed by the team's activities and

recommendations, as documented in this report. The team recommends that NRC management review the team's report and consider whether further response to these questions is needed.

- On March 13, 2020, U.S. Representative Nita Lowey wrote to the NRC Chairman requesting a personal briefing and public meeting on the OIG report and the NRC's response.[126] The team recommends that NRC management review the team's report and respond appropriate.
- On March 11, 2020, several members of the New York State Legislature wrote to the NRC Chairman expressing concern about the Event Inquiry by the OIG.[127] The letter requested that the NRC explain its past and future actions and retract prior analyses used by FERC. The team recommends that NRC management review the team's report and consider what response to this letter is needed.
- On March 9, 2020, the Chief Executive Officer of the New York State Department of Public Service wrote to the NRC Chairman and FERC Chairman expressing concern about the Event Inquiry by the OIG.[128] The letter requested that the agencies respond to issues raised in a June 2018 letter.[129] The June 2018 letter included questions regarding the Indian Point spent fuel pools, use of ALOHA and Regulatory Guide 1.91 to evaluate pipelines including the preexisting pipelines, the status of security reviews, the conclusions of the 2008 evaluation of pipelines, and whether seismic analyses were conducted of the pipelines. Several of these questions are addressed by this report. The team recommends that NRC management review the team's report and consider whether further response to these questions is needed.
- As noted by then-Chairman Burns in a November 2015 letter,[130] the Advisory Committee on Reactor Safeguards formed a working group to evaluate external man-made hazards (such as pipelines) at nuclear power plants. Based on a discussion with the Executive Director and Chairman of the Advisory Committee on Reactor Safeguards, the team understands that this work is ongoing. The NRC should remain apprised of the progress and results of this activity.

Appendix A. Historical Information on Preexisting Gas Pipelines

This appendix presents background information on how these preexisting pipelines were evaluated by the licensee and the NRC. This team's primary scope of work relates to the later-installed 42-inch AIM pipeline that is the main subject of this report. Some of the analyses for the 42-inch AIM pipeline referenced prior analyses of the preexisting pipelines. Reevaluating prior conclusions on the 26-inch and 30-inch preexisting pipelines is not within the scope of the team's work. The team summarizes this information for context without passing judgment on the prior conclusions.

A.1. Initial Licensing (1960-1973)

This section summarizes information readily available to the team in the Agencywide Documents Access and Management System (ADAMS) regarding the initial licensing of Indian Point Units 1, 2, and 3. It does not represent a comprehensive review of the licensing bases of these reactors. The summary, however, shows that the AEC and NRC were aware of and, in some cases, explicitly evaluated the preexisting gas transmission lines as part of the initial licensing of the facilities.

Indian Point Unit 1

In November 1960, as part of its operating license application, Consolidated Edison submitted a map of the area around Indian Point showing public utilities as Exhibit H-13.[131] This map shows the Algonquin gas transmission line as a dashed black line, crossing the Hudson River and passing within about 1,000 feet (the map scale is not precise) of the centerline of Indian Point Unit 1. A section of the map is reproduced in this report as Figure 13.

Consolidated Edison also submitted Exhibit H-14, a scale plot plan of the site showing the 26-inch gas main and the Algonquin right of way. A section of the plot plan is reproduced in this report as Figure 14. Consolidated Edison submitted Exhibit H-14, Revision 1, in September 1962 to add some details related to offices, material storage, and vehicle storage and maintenance, as well as removal of the "caretaker's house" and a temporary construction building.[132]

In February 1962, the Commission ordered the AEC staff to issue a provisional license for Indian Point Unit 1.[133] Paragraph 43 of that order stated that:

> Paragraph A-3 of Appendix A to the license as approved above limits more than the applicant would have it to do the utilization at the reactor site of Consolidated's natural gas facilities. The applicant proposed to include as site activities the transmission and distribution of natural gas, with no bulk storage there and no pressure above 50 psig within 600 feet of the reactor building. Cogent reasons for adopting the staff position have heretofore been discussed. Upon this point it has been shown that use of the natural gas facilities at the reactor site <u>as described in the application</u> is not inimical to public health and safety and constitutes no threat to the integrity and safety of the reactor facilities and utilization. Other now unknown and unevaluated possible uses of natural gas or natural gas installations at the site might portend hazards to reactor safety. Accordingly, the technical specification appropriately should limit the natural gas facilities and utilizations at the site to those which have been described and which consequently have been weighed in deriving the safety judgments herein expressed.

This paragraph in the order refers to Section A.3 of the technical specifications, which are in Appendix A to the provisional license.[134] Section A.3 states:

> The principal activities carried on within the exclusion area shall be the generation, transmission and distribution of steam (except by gas-fired power plant); the generation, transmission and distribution of electrical energy; and associated service activities. Such activities, among others, shall include in the case of the facility, the subject of this license, activities relating to the controlled conversion of the atomic energy of fuel to heat energy by the process of nuclear fission and the storage, utilization and production of special nuclear, source and byproduct materials. Transmission and distribution of natural gas shall be through the use of facilities located as described in the application.[135, 136]

The "exclusion area" was defined in Section A.2 of the original technical specifications as the area surrounding the facility for which access was under the full control of Consolidated Edison, approximately 1/3 of a mile.[137]

Consolidated Edison reported to the AEC in October 1964, that—consistent with the provisions in its license for changes it could make to the facility—Consolidated Edison was permitting the Algonquin Transmission Company to widen its right of way to install an additional gas transmission pipeline (i.e., the 30-inch line noted above).[138] Consolidated Edison noted that the total right of way would increase from 30 to 65 feet, but the minimum distance between the pipelines and the restricted area of the facility would be unchanged because the new pipeline would be farther away from the present pipeline. Consolidated Edison provided a new Exhibit H-14 (Revision 2).[139] A section of the plot plan is reproduced in this report as Figure 15. There are no records showing that the AEC disagreed with the licensee's determination that it could make this change without prior approval.

In November 1969, Consolidated Edison provided supplementary information that the AEC needed to authorize a full-term (rather than provisional) operating license.[140] The AEC had requested that Unit 1 be compared to the General Design Criteria that had been published in 1967 as a proposed amendment to the AEC's regulations.[141] Specific to proposed Criterion 2 on withstanding forces from local site effects, Consolidated Edison analyzed gas pipeline accidents.

Consolidated Edison clarified the pipelines that were near the site at the time:

> The first pipeline was installed in Indian Point in 1952; the second line in 1965. Both pipes are made of 52,000 psi minimum yield strength steel, conforming to the American Petroleum Institute Specification 5LX52.
>
> The 1952 pipe has an outside diameter and wall thickness of 26" and 0.281" respectively. Hoop stress calculations on a pipe of these dimensions and material show that the pipe is capable of withstanding internal pressures of 1125 psi before yield point stresses develop.
>
> The outside diameter and wall thickness of the 1965 pipe are 30" and 0.438", respectively. This pipe is calculated to withstand internal pressures of 1520 psi before yield point stress is developed.

The licensee discussed the American Standard Code and New York State Safety Code, noting that a small percentage of failures and fires of pipelines reported by the Federal Power Commission occurred in states with stringent safety requirements. The licensee also reported on the inspection procedures and operating history of the Algonquin Transmission Company. The licensee described the design, operation, and maintenance of the pipelines, noting that "conditions which might lead to a pipeline failure have either been provided for in the design of the pipes, or do not exist at the Indian Point site."

The licensee also considered a postulated pipeline failure, including the potential for explosions that could create missiles, as well as the potential for fire damage caused by burning gas and secondary fires. The evaluation of fires assumed that the "primary fire would be of short duration since automatic shut off valves would isolate the ruptured section of the main within 4 minutes." The valves were located on both banks of the Hudson River to the west of Indian Point and in Yorktown, NY, about 10 miles east of Indian Point. The licensee noted that it had already been concluded (as noted in the next section) "that the gas transmission line pose no danger to the safe operation of Unit No. 3." Since Unit 1 was north of Unit 3, the pipelines were further away "and therefore pose no problem."

In December 1973, the AEC's Directorate of Licensing completed the Section 2 (Site Safety) safety evaluation input for the Unit 1 full-term operating license.[142] This section has only a short passage on the pipelines: "Two natural gas lines cross the Hudson River and pass about 750 feet from the Indian Point 1 containment structure. Based on previous staff reviews, failures of these gas lines will not impair the safe operation of Indian Point 1." The details of these "staff reviews" could not be found.

The analysis effectively became moot in October 1974. Unit 1 shut down at that point when a "variance" issued regarding emergency core cooling systems at the facility expired and did not resume operating.[143]

Indian Point Unit 2

In December 1965, Consolidated Edison applied to the AEC for a construction permit to expand its Indian Point facility with Unit 2.[144] Section 1.2.3, "Site Ownership and Control," of the preliminary safety analysis report includes the following text:[145]

> The Algonquin Gas Transmission Co. has a right-of-way running east to west through the property, 3500 feet long and 65 feet wide. The proposed reactor is 1450 feet north of the Algonquin 26-inch gas main.

The 65-foot width is consistent with the widening noted in the 1964 Unit 1 document. That wider right of way would have accommodated the 30-inch pipeline, for which construction began in 1965. This PSAR chapter also included figures similar to those provided for Unit 1. Portions of these, dated August and November 1965, are reproduced in this report as Figure 16 and Figure 17, respectively.

The FSAR submitted to support the Unit 2 operating license application provides similar information on the pipeline right of way:[146]

> The Algonquin Gas Transmission Company has a right-of-way running east to west through the property, 2840 feet long and 65 feet wide. Unit 2 is 1450 feet north of the 26 inch Algonquin gas main.

The 1970 safety evaluation for the Unit 2 operating license does not reference the pipelines or any other nearby industrial facilities.[147]

Indian Point Unit 3

In April 1967, Consolidated Edison applied to the AEC for a construction permit to expand its Indian Point facility further with Unit 3.[148] Section 1.2.3, "Site Ownership and Control," of the PSAR includes the following text:[149]

> The Algonquin Gas Transmission Co. has a right-of-way running east to west through the property, 3500 feet long and 65 feet wide. The proposed reactor is 700 feet north of the Algonquin 26-inch gas main.

Because Unit 3 is southwest of Units 1 and 2, the pipeline right of way is several hundred feet closer to Unit 3 than to Units 1 and 2. This PSAR chapter also includes a site plot plan similar to those provided for Units 1 and 2. A section of the plot plan, dated April 1967, is reproduced in this report as Figure 18.

As part of the construction permit review, the AEC asked Consolidated Edison to analyze the ability of the facility to accommodate the consequences of an explosion or fire in the pipelines. In 1968, Consolidated Edison responded with an analysis submitted was very similar to what Consolidated Edison would provide for Unit 1 in 1969, as described above. [150] This evaluation led the applicant to conclude that the presence of the lines "does not endanger the safe operation of Unit #3."

This information was not specifically discussed in the AEC's safety evaluation for the Unit 3 construction permit.[151]

The FSAR submitted to support the Unit 3 operating license application provides information on the pipeline right of way very similar to that for Unit 2, without clarifying information on the Unit 3 location:[152]

> The Algonquin Gas Transmission Company has a right-of-way running east to west through the property, 2840 feet long and 65 feet wide. Unit 2 is 1450 feet north of the 26 inch Algonquin gas main.

In the 1973 safety evaluation for the Unit 3 operating license, the AEC stated that "two natural gas lines cross the Hudson River and pass about 620 feet from the Indian Point 3 containment structure. Based on previous staff reviews, failures of these gas lines will not impair the safe operation of Indian Point 3."[153] As for Unit 1, the details of these "staff reviews" could not be found.

A.2. Licensee FSAR Updates (1980-2014)

Initially, the NRC did not require licensees to maintain and resubmit the FSARs submitted as part of their operating license applications. In 1980, the NRC issued a rule—10 CFR 50.71(e)—requiring licensees to submit an updated FSAR within 2 years and annual updates thereafter. [154]

Indian Point Unit 2

In July 1982, Consolidated Edison submitted Revision 0 of the updated FSAR for Indian Point Unit 2.[155] The 26-inch gas pipeline was mentioned in Section 2.2.3, "Site Ownership and Control": "The Algonquin Gas Transmission Company has a right-of-way running east [to] west through the property, 2840 feet long and 65 feet north of the 26 inch Algonquin gas main." The 30-inch gas main (which is located farther away from Unit 2 and within the same right of way) was not specifically mentioned. Chapter 2 of the FSAR did not present further analysis of the natural gas pipelines or any other nearby industrial facilities.

Revision 0 omitted some words from the original FSAR, which had been clear that the right of way was 65 feet wide and lay 1,450 feet south of Unit 2. Consolidated Edison corrected the FSAR error in Revision 2, restating this passage as: "The Algonquin Gas Transmission Company has a right-of-way running east to west through the property, 2840 ft long and 65 ft wide. Unit 2 is 1450 ft north of the 26-in. Algonquin gas main."[156]

This text was substantially unchanged until 2008, when Entergy submitted Revision 21 to the Indian Point Unit 2 FSAR.[157] This revision included updated text in Section 2.2.3 (highlighted in gray below) associated with the pipelines, as well as a new Figure 2.2-3. No further analysis was included in Chapter 2. Section A.4 of this report describes analyses conducted by Entergy in 2008 that may have triggered this update.

> Entergy owns the Indian Point Units 1 and 2 Nuclear Power Plants. As shown in Figure 2.2-3, the Algonquin Gas Transmission Company has a 24 inch gas mainline and a 30 inch loop line on a 65 foot wide right-of-way running east to west through the property. Unit 2 is 1450-ft north of the 24-in. Algonquin gas mainline.
>
> The Georgia-Pacific Corporation has an easement, 1610-ft long and 30-ft wide, through the southerly part of the Indian Point site. The Georgia-Pacific easement is used for overhead electrical power and telephone lines and underground gas, water, and sewer lines. These easements permit Entergy to determine all activities within the right-of-way in order to ensure safe operation of the units.

This revision changed the diameter of the pipeline, added the figure included in this report as Figure 19, and clarified Entergy's ability to determine activities within the easements to ensure safe operation of the units.

Entergy revised the FSAR in October 2010 to correct and clarify the sizes of the preexisting pipelines, as shown in the highlighted text:[158]

> As shown in Figure 2.2-3, the Algonquin Gas Transmission Company has a 26 inch gas mainline and a 30 inch gas mainline on a 65 foot wide right-of-way running east to west through the property. Unit 2 is 1450-ft north of the 26-in. Algonquin gas mainline. One 30 inch main and 2-24 inch mains pass under the river to a pipeline facilities station on the easement near the river. One 24 inch main is available as a bypass alternative and ends in the pipeline facilities station while the other two continue as the 30 inch and 26 inch mains.

There were no further substantive changes to Chapter 2 of the FSAR regarding the pipelines until analysis of the AIM 42-inch pipeline was included, as discussed in Section 1.2 of this report.

Indian Point Unit 3

In July 1982, the Power Authority of the State of New York submitted Revision 0 of the updated FSAR for Indian Point Unit 3.[159] The 26-inch gas pipeline was mentioned in Section 2.2.2, "Site Ownership and Control":

> ...the Algonquin Gas Transmission Company has a 26 inch gas main on a right-of-way (approximately 1350 feet long and 65 feet wide) running east to west through the Authority's property. ... These easements permit the Authority to determine all activities within the right-of-way in order to ensure safe operation of the unit.

The 30-inch gas main (which is located farther away from Unit 3 and within the same right of way) was not specifically mentioned. Chapter 2 of the FSAR did not present analyses of the natural gas pipelines or any other nearby industrial facilities.

This text was substantially unchanged until the 2009 update to the Indian Point Unit 3 FSAR.[160] This revision included updated text in Section 2.2.2 (highlighted in gray below) associated with the pipelines. The referenced FSAR Figure 2.2-2 is similar to Figure 18 included in this report. Section 0 of this report describes the referenced analysis.[161]

As shown in Figure 2.2-2, the Algonquin Gas Transmission Company has a 24 inch gas mainline and a 30 inch loop line on a right-of-way (approximately 1350 feet long and 65 feet wide) running east to west through Entergy's property. The threats posed by the rupture of these pipelines and the release of natural gas (essentially methane) from them were addressed in Item 7 of Supplement 1 to the original FSAR. The September 21, 1973 SER concluded the failure of these gas lines would not impair the safe operation of the plant.

A subsequent evaluation in 2008, (Reference 1), discussed the consequences of a pipeline rupture and the potential impact of that event on the sites Protected Area, Vital Areas, the Security Plan, safe shutdown, and other non-safety related structures, such as the waterfront warehouse. The hazards created by a breach and explosion of the pressurized above ground portions of the pipeline include:

a. potential missiles,

b. an over-pressurization event,

c. a vapor cloud or flash fire,

d. a hypothetical vapor cloud explosion, and

e. a jet fire.

A simultaneous rupture and ignition of both gas mains at the above ground locations inside the owner controlled area (OCA) is postulated to be the worst case scenario since this event will result in the most significant release of gas volume and have the potential to contribute to the largest potential fire. An attempt to uncover, breach and ignite a buried portion of the pipeline was not considered feasible. The report concluded that the event would not damage any safety related structure and there are no adverse effects on the gas pipeline event on vital areas, safe shutdown equipment, IPEC Security Plan, or essential personnel. Some damage to non-vital structures or non-essential personnel in the area of the pipeline may occur.

Entergy next changed this section in the 2015 update to the Indian Point Unit 3 FSAR, relevant portions of which are shown in gray highlight below.[162] Section A.4 of this report describes a 2015 analysis that was likely the trigger for this update.

> A subsequent evaluation in 2008 (Reference 1) discussed the consequences of fire and explosion due to a pipeline rupture. ... An attempt to uncover, breach and ignite a buried portion of the pipeline was not considered feasible. The report concluded that the rupture of the natural gas pipelines that cross the Indian Point site and subsequent ignition of the methane released will result in a jet fire and injury or death to any people exposed to flames or intense thermal radiation. It will not, however, damage any safety related structure. Even in the unlikely event of a hypothetical vapor cloud explosion, structural damage to buildings other than the waterfront warehouse adjacent to the pipelines will not occur. A flammable vapor cloud fire that engulfs the plant is improbable because the turbulent momentum with which the methane exits the pipeline will confine flammable methane concentrations to the point of release.

There were no further substantive changes to Chapter 2 of the FSAR regarding the pipelines until analysis of the AIM 42-inch pipeline was included, as discussed in Section 1.2 of this report.

A.3. Indian Point Hearings (1979-1985)

In September 1979, the Union of Concerned Scientists petitioned the NRC to decommission Indian Point Unit 1 and suspend operation of Units 2 and 3. In February 1980, the Director of the NRC Office of Nuclear Reactor Regulation (NRR) issued his decision on the petition (referred to as a Director's Decision).[163] The Director's Decision granted a portion of the petition regarding Unit 1 (as noted at the end of Section 0 above). The Director's Decision, however, denied the request to suspend operation of Units 2 and 3, given the issuance of confirmatory orders to the licensees that required multiple important interim safety measures. While the Director's Decision did not address the gas pipelines near Indian Point, the extensive follow-up activities did include additional analysis of the pipelines.

After reviewing the Director's Decision and considering public comments, the NRC Commission in May 1980 announced a "four-pronged approach" to resolve issues raised by the petition:[164]

- Holding an adjudication on the safety issues for Units 2 and 3, with the Atomic Safety and Licensing Board making findings and recommendations for a Commission decision
- Holding an informal proceeding to determine the issues to be pursued in the adjudication
- Considering generically the question of reactors in areas of high population density
- Establishing a staff task force to review data and give the Commission information to decide the status of Units 2 and 3[165]

The Commission was interested in the risks of serious accidents at Indian Point Units 2 and 3, including accidents not considered in the plants' design bases. This topic was identified in the Commission's May 1980 order and amplified in additional orders issued later in 1981.[166]

The Atomic Safety and Licensing Board issued its findings and recommendations in October 1983.[167] This document does not refer specifically to the natural gas pipelines near Indian Point, other than noting that externally initiated events are the principal contributors to risk at Indian Point. In coming to its conclusions, however, the Board considered evaluations that do address the pipelines, including:

- The Indian Point Probabilistic Safety Study, prepared by the licensees
- "Letter Report on Review and Evaluation of the Indian Point Safety Study" by Sandia National Laboratories

The sections below describe these evaluations in more detail.

The Commission issued its decision in May 1985, addressing the risk of Indian Point—including ways to reduce risk and how the risk compared to other plants—as well as emergency planning and other topics.[168] The Commission considered the two analyses noted above, as well as other information, but did not explicitly reference the natural gas pipelines as a hazard or accident initiator. The Commission concluded that neither the shutdown of Units 2 and 3, nor imposition of additional remedial actions beyond those implemented voluntarily by the licensees, was warranted. As a result, the NRC rescinded some aspects of the confirmatory order that had been issued to the licensees for Units 2 and 3 in February 1980.[169] The Commission found that the risk reduction effect of those measures was "not sufficient to be termed substantial," and that they should not be imposed unless they were needed to fulfill generic requirements applicable to similar types of reactors or to meet other license requirements for Indian Point.

Indian Point Probabilistic Safety Study

The Indian Point licensees submitted the Indian Point Probabilistic Safety Study in March 1982 for use in the adjudicatory proceeding.[170] This was one of the earliest comprehensive risk assessments of a nuclear power plant. Based on the study's results, the licensees identified and implemented cost-effective risk reductions, including new tests and procedures and certain equipment and structural changes.

Volume 11 of the study, Section 7.7.4, documents the licensees' evaluation of the gas transmission lines near Indian Point.[171] The evaluation is not significantly more detailed than those submitted in 1968-1969 for initial licensing (in fact, it references a United Engineers and Constructors[172] analysis from April 1968 that likely was the input for those submittals), but it does include data and estimates in addition to the prior qualitative assessments. The licensees had also obtained additional information from the Algonquin Gas Transmission Company in February 1981. Several key assumptions and results from this section are summarized in the list below.

- ***Probability of pipeline failure:***
  - The 26-inch and 30-inch pipelines had been successfully hydrostatically tested in 1952 and 1965, respectively, to at least 92 percent of yield stress. Preventive maintenance included a twice-weekly aerial survey, a twice-yearly foot patrol with leak survey equipment, a monthly vehicle patrol, and weekly inspection of cathodic protection.
  - Data from the U.S. Department of Transportation and information from the Algonquin Gas Transmission Company were used to determine the failure frequency for large transmission lines. Only 30 percent of known failures (excluding the 70 percent resulting from damage by outside forces) were assumed to apply to these pipelines.
  - The estimated pipeline failure probability was approximately 5×10^{-7} per year. This estimate considered transmission line failures in the United States, length of pipe near site, fraction of failures that were large, fraction of time wind would blow toward the plant, fraction of failures due to original construction and corrosion, and fraction of leaks going undetected.
- ***Consequences of pipeline failure:***
  - Automatic shutoff valves were located at the east side of the Hudson River and in Yorktown, NY (10 miles away). They would isolate the 10-mile section passing near the plant. Gas would empty out in a little over an hour, supporting combustion for a total of 15 to 20 minutes.
  - If a fire occurred, destroying the offsite power lines, the plant could be shut down using diesel generator or gas turbine power.
  - Missiles had been found as far as 351 feet from a Louisiana pipeline explosion. Such missiles would "pose little threat" to the Unit 3 facilities at least 400 feet from the pipelines or the Unit 2 facilities "which might be more vulnerable, but which are located 1,000 feet from the line and which are protected by a number of other structures."
  - The possibility of a gas line fire leading to a core melt is "extremely small."

- ***Other issues:***
  - Smaller leaks were determined not to jeopardize the plant; the probability of wind blowing toward the plant was cited as 0.14. This was considered in the pipeline failure probability but could also be used in considering other consequences of pipeline leaks.

Sandia National Laboratories Evaluation

In August 1982, Sandia National Laboratories provided the NRC with a draft letter report documenting its review of the Indian Point Probabilistic Safety Study.[173] In Section 2.7.5 of the report, Sandia commented on the thermal hazards from a pipeline fire:

> A fire from such a large leak would have to burn for several hours before safety related concrete structure might be threatened. Such long exposures to high heat fluxes do not result in catastrophic failure of structures, but rather in the (conservative) thermal design criteria for reinforced concrete structures being exceeded.
>
> Thus, the probability of 5 x 10-7/year developed in [Indian Point Probabilistic Safety Study] Section 7.7.5 is a very conservative estimate for the loss of safety-related equipment. Based on this probability, the contribution to the risk arising from the failure of these exposed pumps due to offsite fires would be expected to be less than that due to tornado hazards. An expected probability of exceeding Part 100 exposure guidelines or of a core melt would be much smaller.
>
> In summary, the probability of thermal fluxes from large fires endangering the safety related structures and equipment is bounded by the failure of this equipment by tornado hazards. The already low probabilities of occurrance [sic] of the fires would be very conservative estimates of the probabilities for exceeding Part 100 guidelines or for core melt.

This letter report was followed by a formal NUREG report completed in December 1982.[174] The purpose of the review was to search for areas in the licensees' analysis where omissions and critical judgments were made that could impact the quantitative results. This report addressed pipeline accidents from two perspectives.

- **Thermal hazards.** The evaluation in the final report had the same conclusions as the draft report—that there would not be catastrophic failure of structures or a significant impact on the Indian Point plant damage states or risk.
- **Blast hazards.** The evaluation noted that pipeline fragments, which could be propelled about 350 feet, would pose minimal risks to reinforced concrete structures. They would penetrate only a very small distance compared to design-basis tornado missiles.

Atomic Safety and Licensing Board Hearing

The Atomic Safety and Licensing Board considered these pipeline evaluations in during a February 1983 hearing. Specifically, Dr. Robert Budnitz,[175] a consultant who supported the NRC and Sandia National Laboratories reviews, provided written and oral testimony.[176]

In his written testimony, Dr. Budnitz stated that he accepted most of the licensees' basic data, but had reservations about the estimates for large leak fraction and small leak growth. He noted that the NRC staff had produced its own analysis, with which he agreed, resulting in a value of about

8 x 10^{-5} per year per mile of pipeline for large leaks. He identified three issues of concern that were not analyzed in the Indian Point Probabilistic Safety Study, as summarized below.

- **Damage to the site electrical system from a pipeline accident.** Dr. Budnitz stated that it was conceivable that a pipeline rupture and large fire could compromise offsite power, since the transmission lines pass over the pipeline. Using the NRC staff's value of 8 x 10^{-5} per year per mile of pipeline, even if offsite power were compromised every time, this rate of failure of offsite power would be acceptably small. Dr. Budnitz indicated that the actual probability of power loss was probably much smaller.[177] Accordingly, he concluded that this problem was not an important contributor to risk.
- **Gas flowing toward the plant prior to ignition, being taken up in plant systems, and then igniting.** Dr. Budnitz identified two possible scenarios: (1) an unusual wind pattern could blow gas toward the site, overcoming the normally high buoyancy of natural gas, or (2) the high buoyancy of gas could be reduced because of expansion cooling during its escape from the pipeline, making its density higher than air. While Dr. Budnitz admitted this effect had not been quantified, he noted that the small orifice needed for significant expansion cooling was "probably very small compared to a size that could produce large volumes of gas." He also indicated that it was not likely that the gas could remain cold and dense (without mixing with air) while traveling several hundred feet to safety equipment at the reactor. Therefore, while the analysis "to allay this concern fully" had not been done, the issue seemed unlikely to produce a "major incremental risk."
- **Isolation valve failure that would lead to continuous pumping of natural gas out of the break, causing a much larger fireball.** Dr. Budnitz found that this issue could also be "bounded acceptably." Even if the valves failed in every pipeline break, such fireballs would occur based on the staff estimate "only every 12,000 years or so." Dr. Budnitz noted that the fire would "in all likelihood be localized to the region near the pipeline, with little chance of spreading to the plant except under the most unusual wind conditions." He stated that the overall threat seems "to be sufficiently infrequent that its contribution to overall risk can be considered small."

Dr. Budnitz concluded overall that the core-melt risk to Indian Point from gas pipeline failures was considerably less than the risks from other sources, and that omitting a full-scale quantitative risk analysis for pipelines at Indian Point was acceptable. In his hearing testimony, Dr. Budnitz acknowledged that there was not a realistic numerical analysis of the probability of core damage that would make him "comfortable by itself," but that he felt comfortable with the pipeline bounding analysis.

A.4. Additional Licensee Evaluations of Preexisting Pipelines (1980-2015)

Control Room Habitability Report

In 1980, as part of the response to the accident at Three Mile Island (TMI) Unit 2, the NRC issued NUREG-0737, "Clarification of TMI Action Plan Requirements."[178] Item III.D.3.4 of NUREG-0737 stated, in part, that licensees needed to assure that control room operators would be adequately protected against the effects of accidental release of toxic or radioactive gases. In response, the Power Authority of the State of New York submitted a control room habitability report.[179] It included the following text related to the preexisting natural gas pipelines:

> The Algonquin Gas right-of-way passes approximately 0.3 miles from the Indian Point Unit 3 Control Room Air Intake. Two pipelines carrying natural gas (96%

methane, 2.5% ethane, 0.5% propane) are installed in the right-of-way. Methane is not a toxic chemical. The pipelines are, therefore, deleted from further consideration in this study.

This information is not explicitly addressed in the relevant input to the NRC safety evaluation on this topic.[180]

Individual Plant Examination of External Events

In the late 1980s and early 1990s, the NRC assessed issues and guidance that were not within the licensing scope for facilities licensed before 1976 (including Indian Point Units 2 and 3).[181] In particular, in June 1991, licensees were asked to conduct an Individual Plant Examination for External Events (IPEEE).[182] The NRC concluded in 1993 that the IPEEE would address hazards posed by industrial facilities located near nuclear power plants licensed before 1976.[183]

Unit 2

In December 1995, Consolidated Edison submitted the IPEEE for Unit 2.[184] The licensee considered earthquakes that could damage the gas pipelines, as well as pipeline accidents in general.

The licensee noted several measures that enhanced the quality of the pipelines: stronger construction, random joint x-rays, recent inspection of the 26-inch line with "smart pigs," a coating and cathodic protection to prevent corrosion, and frequent surveys. The licensee also noted that there were manual shutoff valves located by the river crossing, and that a Supervisory Control and Data Acquisition (SCADA) system provides instant flow and pressure information, so that a leak could be quickly detected.

In the seismic assessment, the licensee cited multiple construction features that would support the pipelines and prevent slope failures. In one location 1,200 feet from the nearest Unit 2 structures, the licensee identified a slope that it could not screen out of its assessment. To address this location, the licensee considered three potential failure impacts.

- **Fires at the pipeline.** These were determined not to impact Indian Point Unit 2 given the 100-foot-wide firebreak around the plant.
- **Explosions.** The licensee referenced "extensive studies by the US Bureau of Mines and others" demonstrating that natural gas does not detonate unless confined, so a severe shock wave was deemed not credible.
- **Transport of a vapor cloud and fire at the plant site.** The licensee noted that natural gas readily disperses into the atmosphere, and it was unlikely that weather conditions would support a gas cloud that could travel 1,200 feet from the pipeline to Unit 2 and still support combustion or asphyxiation.

The licensee estimated a frequency of an earthquake that could cause the pipeline to fail, combined with wind in the direction of Unit 2, with the gas cloud not igniting until it reached critical safety systems and structures. This frequency was 6×10^{-7} per year. Since this was below the screening criterion of 10^{-6} per year, the scenario was screened from further analysis and the gas pipelines were determined not to be aseismic vulnerability.

The licensee evaluated gas pipeline accidents in general as well. The licensee contacted the Algonquin Gas Transmission Company for updated information on the performance and service history of the pipelines since the Indian Point Probabilistic Safety Study was conducted. The licensee noted that:

- The 26-inch pipeline was retested after installation.
- Pressure relief valves had been replaced with line pressure monitors, and automatic shutoff controls had been removed from all valves given a history of false closures.[185] Quick response to line breaks was expected because of the emergency response plan in place and the use of a SCADA system.
- Vehicle patrols were weekly rather than monthly as noted in the Indian Point Probabilistic Safety Study.

The licensee concluded that the analysis from the Indian Point Probabilistic Safety Study (estimating a 5×10^{-7} per year failure frequency) remained applicable, and the event could be screened out.

The NRC documented its review of the Indian Point Unit 2 IPEEE in May 1999.[186] The reviewers summarized the information on seismically induced failures without noting any objections. For pipeline accidents in general, the reviewers noted that hazard frequency arguments were used to screen these events from further consideration. The natural gas pipeline accident analyses, with a failure frequency of about 5×10^{-7} per year, were considered reasonable.

Unit 3

In September 1997, the Power Authority of the State of New York submitted the IPEEE for Unit 3.[187] The licensee referenced the Unit 2 IPEEE seismic analysis, making the same conclusion for Unit 3 that the pipelines could be screened as a seismic vulnerability. The licensee then noted that a pipeline explosion could result in damaging overpressures at Unit 3.

The assessment considered factors that reduced the likelihood failures of the pipelines that come within 400 feet of safety-related equipment for Unit 3. The licensee provided background on hydrostatic testing of the pipelines, internal inspections conducted every 3 years, pressure monitoring, and surveys used to detect leaks and possible threats. The licensee considered that overpressure failures were unlikely to pose significant risks given these design features and the distance to the plant (greater than the 351-foot distance missiles were thrown in a Louisiana pipeline failure). The licensee also stated that the pipelines were buried in a wide, clear, and well-marked right of way on site, so they were unlikely to be damaged by careless construction or excavation.

To consider pipeline failure consequences, the licensee examined a catastrophic event caused by a pipeline rupture and a vapor cloud explosion. The licensee estimated initial discharge rates from both pipelines and the jets that could be produced. Explosion of methane in those jets could result in a 1-psi overpressure at distances that "may cause major damage" to Unit 3. Formation of a plume of buoyant methane could create a flammable vapor cloud. If the entire contents of the 10-mile pipeline length between valves were included in the cloud and an explosion occurred, "a 1-psi overpressure may engulf" Unit 3.

The licensee, however, concluded that these vapor cloud explosions could be eliminated as a source of concern. Referencing data from a 1994 risk analysis text, the licensee estimated a failure frequency of large diameter pipelines: about 1.2×10^{-4} per year for the 5 miles of pipeline around Indian Point Unit 3. Assuming a 0.01 probability of a vapor cloud explosion following a pipeline failure and a 0.1 conditional probability of core damage, the resulting core damage frequency contribution was less than the 10^{-6} screening value.

The NRC documented its review of the Indian Point Unit 3 IPEEE in December 2000.[188] This review noted that the licensee did not estimate the core damage frequency from nearby facility incidents (which includes pipelines) to be greater than 10^{-6} per year. The NRC observed that the analyses "were done only to the level of detail needed to screen out" the event and concluded that the licensee appeared to have identified the significant initiating events. There was no discussion specific to the pipelines.

2008 Entergy Analysis

In March 2008, the NRC expressed a concern to Entergy regarding a potential security vulnerability associated with the preexisting natural gas lines. In two security-related responses submitted in April and September 2008, Entergy provided the NRC with information about the referenced location.[189] Entergy referenced an analysis of pipeline incidents by Dr. David J. Allen of the Risk Research Group, a consultant who also prepared the analyses of nearby facility hazards for the Indian Point Unit 3 IPEEE and conducted later analyses for Entergy discussed in this report.

The consultant noted that the Indian Point Unit 3 IPEEE did not assess the consequences of a natural gas release in detail given the predicted frequency of spontaneous ruptures. Considering instead intentional and malicious activity, it became necessary to reevaluate the consequences of natural gas releases. The consultant noted that a large line break would result in a remote low pressure alarm (in Houston, TX) and pushbutton isolation of about 6.5 miles of pipeline. Using the BREEZE and ALOHA codes, the consultant analyzed jet fires, vapor cloud fires, and hypothetical vapor cloud explosions (though they were deemed unlikely) from a particular point near Unit 3.

The resulting heat flux from jet fires, which could burn for over an hour depending on the scenario, was found to be low enough not to damage equipment except in the immediate vicinity of pipelines, with no major damage to facilities. (Section 0 below provides additional detail on heat flux calculations.) Vapor cloud fires were determined not "to be a real possibility" given the turbulence and high velocity with which the natural gas would exit the pipeline (making jet fires more likely). Vapor cloud explosions were found to be "most unlikely" given the little confinement near the pipelines. Assuming some confinement from nearby trees, the consultant calculated overpressures that would not damage safety-related structures on site.

The consultant noted that these results "differ at first sight from the conclusions drawn in the original IPEEE ... about a vapor cloud explosion or flammable vapor cloud engulfing the plant." The consultant offered the following explanation:

> The re-evaluation of the consequences of this event and, in particular, the recognition of the effect of turbulent mixing as the methane exits the pipeline and of the fact that vapor cloud explosions involving methane do not occur in uncongested or semi-open spaces, leads us to conclude that the hypothetical engulfment of the plant in a vapor cloud explosion or vapor cloud fire is improbable. That said, a jet fire, ignored in the IPEEE, is likely to occur in the event a gas pipeline is ruptured. Such a fire might well endanger plant staff who are unable to shelter; it would not, however, damage safety structures or equipment.

2015 Entergy Analysis

In August 2015, the NRC expressed a concern to Entergy regarding the 2008 consultant report, particularly the heat flux calculations and the location where the rupture was assumed. The NRC also asked Entergy to provide details on the plant's licensing basis with respect to the pipelines.

In a security-related response provided to the NRC in October 2015, [190] Entergy clarified that the rupture location in the 2008 analysis was based on the issues raised by the NRC. Entergy also clarified that no time had been assumed in 2008 for isolation of the ruptured line because the duration did not affect the peak values calculated for overpressure and heat flux. The analysis assumed that the remaining gas would burn for a period of time after isolation. Entergy also noted that the Unit 2 IPEEE had referenced the change from automatic to remote (not automatic) isolation of the valves on the gas pipeline. Entergy determined that, since the most significant effects of a pipeline rupture are at the beginning of a release, "the timing of valve closure is not considered relevant" and no new analysis was needed to amend the licensing basis.

Entergy also noted that certain plant equipment had not been accounted for in the heat flux calculations in 2008, and these were addressed in the updated analysis. The 2015 analysis was conducted by the same consultant who performed the 2008 analysis, but it was independently reviewed by another individual not employed by Entergy. The consultant considered jet fires, delayed-ignition cloud fires, vapor cloud explosions, missile generation, and smoke. The 2015 analysis documented heat flux over 12.6 kW/m^2 and overpressure over 1 psi that could negatively affect certain safety-related or important-to-safety equipment or structures for Unit 3. The analysis concluded that the following important equipment could be affected, but that backup equipment would allow for safe shutdown of the plant. Other equipment was less important to the facility or unaffected because of shielding or distance. [191]

- **Emergency diesel generators (based on heat flux at the outside air louvers).** Also, some shielding is provided by other buildings and the downhill slope toward the plant.
- **Several tanks with exposed instruments within the protected area.** The level instruments were assumed to be lost based on heat flux, which could result in required actions under the plant technical specifications, but the tanks could still be used.
- **Equipment in the 138 kV yard.** The analysis discusses multiple ways to restore power, as well as alternative sources that could be manually aligned (which the plant has analyzed).
- **Offsite electrical switchyard and transmission lines.** Loss of the switchyard is postulated for certain rupture locations, and loss of offsite power (an analyzed event) is assumed.
- **Diesel fuel oil storage tank and tanker trailer.** Entergy noted that the tanker trailer, relatively close to the pipeline, was needed to move fuel from the storage tank (which was less likely to be affected) onto the site. Separately, the team verified that the tanker trailer was later moved much farther away from the pipeline and, combined with day tanks onsite, provides significant fuel oil supply for the emergency diesel generators.
- **City water tank.** This water supply provides cooling or backup cooling to various important plant equipment. Entergy noted that other water sources would be available in the scenarios that would affect this tank, though manual alignment may be needed.

Entergy concluded that "the highly unlikely—but assumed—loss of [the] adversely affected SSCs ... would not prevent the safe shutdown of the plant." Entergy also stated that "exposure rates are sufficiently low to justify a conclusion that the original licensing basis (i.e., the gas line will not impair the safe operation of [Unit 3]) is met."

A.5. Additional NRC Evaluations of Preexisting Pipelines (2003-2015)

2003 Security-Related Review

At an NRC meeting in March 2003, a member of the public raised concerns about the safety and security implications of the natural gas pipelines that pass through the Indian Point site. In response, NRC staff reviewed prior evaluations of the pipelines and assessed the risks of large releases of natural gas, including through intentional acts.[192]

In assessing intentional acts, the NRC staff acknowledged that it was not valid to consider the pipe rupture frequency, but rather the pipeline failure had to be assumed as an initial condition. Postulating this rupture, the NRC staff considered the consequences of a major pipe rupture and the likelihood of detonation of an unconfined gas cloud.

First, using the 1 psi overpressure distances included in the Indian Point Unit 3 IPEEE, the NRC staff calculated the mass of the vapor cloud that could create such an overpressure. Using the IPEEE-referenced discharge rates, the NRC staff observed that a vapor cloud that could cause this overpressure could form within a minute. Another equation also indicated that a vapor cloud could form in a short time. (A prior study had shown a mean time between rupture and ignition of 6-7 minutes.) The NRC staff considered the peak overpressure capacities for the fuel handling building and diesel generator building and found that overpressures of 1 psi or less would not pose a significant threat, though higher pressures could pose damage.

The NRC staff noted multiple references showing that unconfined vapor clouds of natural gas are not easily detonated. In the IPEEE, the likelihood of detonation given a large rupture was estimated to be 0.01. Entergy and its contractor informed the NRC that more recent information would support an even lower likelihood.

The NRC staff also estimated radiant heat fluxes using the methodology from NUREG/CR-3330, "Vulnerability of Nuclear Power Plant Structures to Large External Fires."[193] This report estimated an equilibrium flow rate from a rupture in a 36-inch, 1,000 psig pipeline, which the NRC staff viewed as an upper bound since pipeline isolation would decrease the discharge rate over time. Using IPEEE discharge rates and calculations for the radiant heat from a resulting fireball, the NRC staff concluded that at least several hours of fire exposure would be needed to have detrimental effects on safety-related concrete structures. Some wood ignition and personnel injury would be expected depending on the distance.

The NRC staff used this information to suggest that intentional ruptures may be an impractical and unlikely choice for those seeking nuclear power plant damage. The staff recommended that a "definitive evaluation of this aspect" be conducted as a safeguards review.

2010 Petition Review

In October 2010, a member of the public submitted a petition under Title 10 of the *Code of Federal Regulations* (10 CFR), Section 2.206, "Requests for action under this subpart."[194] This petition raised issues with the preexisting pipelines on the Indian Point site. The NRC staff, in considering the petition, reviewed historical information regarding the pipeline, as well as publicly available technical data.[195] The historical references reviewed by the staff have all been described in the sections above in this report. A compiled report containing safeguards information was produced as a record of the review. In addition, the security staff developed questions for the licensee that were shared with regional security inspectors to address at the next baseline inspection.

The NRC staff also used the ALOHA modeling software to assess both the conclusions of the 2008 Entergy analysis (Section 0 above) and the conclusions of the 2003 NRC evaluation (Section 0 above). While details of the ALOHA calculations were not included in the summary memo, the NRC staff asserts in the memo that the 2003 and 2008 conclusions remained valid.

Considering all of this information, the NRC staff did not identify any violations of NRC regulations or any new information that would change the staff's previous conclusion that the pipelines do not endanger the safe or secure operation of Indian Point Units 2 and 3. The NRC did not accept the 10 CFR 2.206 petition for further review, stating that the issues raised had been previously resolved.[196]

Appendix B. Pipeline Rupture Analysis Results

The following pages show the letter report from Sandia National Laboratories on the analyses conducted in support of the evaluation team's activities. (Note: Page numbering resumes with Appendix C, accounting for the length of this report.)

Commented [CT15]: Will insert report into the PDF version of this document, once both are done. Need to fix page numbering of appendix C and beyond to account for however many pages that is (right now it is for an 18-page report based on the draft).

Appendix C. Indian Point Risk Significance Analysis Results

C.1. Executive Summary

Plant Name / Unit Number: Indian Point Energy Center, Units 2 & 3	**Summary Title:** Gas pipeline failure
EA Number (if applicable): N/A	**Result:** Very low safety significance (~10^{-8} ΔCDF)

On February 13, 2020, the U.S. Nuclear Regulatory Commission (NRC) Office of the Inspector General (OIG) issued an Event Inquiry, "Concerns Pertaining to Gas Transmission Lines at the Indian Point Nuclear Power Plant" (Case No. 16-024). In that report, the OIG raised concerns regarding (1) the NRC's safety analysis that supported the Federal Energy Regulatory Commission's (FERC's) determination to approve modifications to gas pipelines at Indian Point and (2) the NRC's response to a petition filed under Title 10 of the Code of Federal Regulations (10 CFR), Section 2.206 on this topic.

On February 24, 2020, the NRC Chairman directed the NRC staff review whether any information in the OIG report demonstrates that the staff should revisit either the safety analysis or its response to the 10 CFR 2.206 petition, as well as to evaluate whether any modifications to agency practice or procedures are needed or appropriate based on the OIG report. As part of this review, the staff initiated a risk assessment of gas pipeline rupture at both Indian Point Unit 2 and Unit 3.

During the review of the previous safety analyses, the team noted that risk was used numerous times, by both the licensee and the NRC to judge that there was no safety concern. The pipeline rupture failure probabilities reported by the Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) are higher than those listed in Entergy or NRC reports. This discrepancy pushes the gas pipeline rupture frequency higher than screening values (1×10^{-6} per year when based on conservative assumptions, or 1×10^{-7} per year when based on realistic assumptions) in Regulatory Guide 1.91.

C.2. Analysis Results

The risk analysis considers the additional risk associated with the gas pipeline rupture. This evaluation only considers the impact for internal events with the reactor at-power.

Change in Core Damage Frequency. The increase in core damage frequency (ΔCDF) for this event is 1.6×10^{-8} per year.

Dominant Sequence. Given the low risk contribution, the dominant accident sequences for the overall model are unchanged. The dominant accident sequence for the gas pipeline failure is simultaneous common-cause failure of all emergency diesel generators to run and failure of the operators to recover the diesels.

C.3. Risk Analysis Details

Analysis Type: An expert at Idaho National Laboratory created an event tree modeling effects of a pipeline rupture. Initiating event frequencies were generated based on data from PHMSA. The analysis also includes the likelihood and impacts of a pipeline rupture in response to all other modeled internal events during the 24-hour mission time.

Model Used: Indian Point Unit 2 Standardized Plant Analysis Risk (SPAR) Model, Version 8.59 and Indian Point Unit 3 SPAR model, Version 8.56

Software Used: SAPHIRE Software, Version 8.2.1

Exposure Time and/or Date of Occurrence: The analyst used the full 1-year exposure time.

Key Modeling Assumptions: The following modeling assumptions and associated basic event modifications were applied for this event analysis:

- **Failure mode:** A gas pipeline rupture causes an unrecoverable loss of switchyard and loss of city water. These failures were based on the results of the initial blast analysis done by Entergy.
- **Initiating event frequency:** The failure data provided by PHMSA (see Appendix D) shows that from 2002-2018, 15 ruptures occurred of pipe that (1) has a diameter greater than 20 inches; (2) has a maximum operating pressure of greater than 300 psig; and (3) is a Class 2, 3, or 4 pipeline. The initiating event frequency was calculated by using the bounding assumption that all 15 of these pipe ruptures resulted in detonation. The data shows that ignition only occurs approximately 50 percent of the time. Additionally, the data is for pipes greater than 20"; since 2002, no ruptures of onshore 42-inch diameter pipes have been reported (one 42-inch inch pipe ruptured offshore during Hurricane Ike). Furthermore, the initiating event frequency assumes that one mile of pipeline is affected; however, there is only 3,935 feet (0.75 miles) of pipeline that would have an impact on the facility. Using these assumptions, the initiating event frequency is calculated to be 1.94×10^{-5}.
- **Appendix R diesel alignment:** The analyst assumed that the Appendix R diesel for Unit 3 can be aligned within 13 minutes and that pumps from the chemical and volume control and component cooling water systems can be aligned to prevent reactor coolant pump (RCP) seal failure following a loss of offsite power and station blackout.
- **Seismic failures:** Seismic failure of the gas pipeline was not explicitly modeled as a cause of the pipeline failure.
- **FLEX:** FLEX equipment was not credited for these calculations; however, implementation of FLEX procedures and equipment would be beneficial in furthering reducing the risk impacts of a pipeline rupture, as the pipeline rupture could cause an extended loss of offsite power.
- **Ex-vessel core damage:** The analyst did not account for the impact of the performance deficiency on ex-core sources, such as spent fuel in the pool, dry fuel storage, or other sources. These sources are outside of the scope of the SPAR models. This risk has been evaluated in Section 2.5 of the report.
- **Human reliability analysis:** The gas pipeline rupture and detonation are expected to have minimal impact on the human failure events that are required to mitigate the accident, given the distance from the blast of the locations where these actions would be taken. Table 2 shows human failure events that are modeled as part of the gas pipeline rupture risk assessment.

Table 2. Human failure events used in the gas pipeline rupture risk assessment.

Event	Description
ACP-XHE-XM-RESET	Operator Fails to Reset MCCs [motor control centers] Following LOOP [loss of offsite power] Or SI [safety injection]
AFW-XHE-XM-HC405	Operator Fails to Operate Hc-405a_B_C&D
CCW-XHE-XM-AC810	Operator Fails to Isolate Non-Regenerative Heat Exchanger
CCW-XHE-XR-MDP31	Operator Fails to Restore CCW MDP-31 After T & M
CCW-XHE-XR-MDP32	Operator Fails to Restore CCW MDP -32 After T & M

Event	Description
CCW-XHE-XR-MDP33	Operator Fails to Restore CCW MDP -33 After T & M
EPS-XHE-XL-NR01H	Operator Fails to Recover Emergency Diesel In 1 Hour
EPS-XHE-XL-NR02H	Operator Fails to Recover Emergency Diesel In 2 Hours
EPS-XHE-XL-SEQ	Operator Fails to Recover DG [Diesel Generator] Load Sequencers
EPS-XHE-XM-APPR	Operators Fails to Start & Align Appendix R DG to Bus 5 Or Bus 6
EPS-XHE-XR-DG31	Operator Fails to Restore DG-31 Following T&M
EPS-XHE-XR-DG32	Operator Fails to Restore DG-32 Following T&M
EPS-XHE-XR-DG33	Operator Fails to Restore DG-33 Following T&M
HPI-XHE-XM-FAB	Operator Fails to Initiate Feed and Bleed Cooling
HPI-XHE-XM-RECIRC	Operator Fails to Start/Control High Pressure Recirc - PWR
MSS-XHE-XL-NITROGEN	Operator Fails to Align B/U Nitrogen to Advs
PWR-XHE-XM-DEPRCS	Operator Fails to Depressurize RCS/Secondary (SSC)
RCS-XHE-XM-RCPTRIP	Operator Fails to Trip RCPs after Loss of Cooling
SWS-XHE-XM-2930	Operator Misaligns ESS & Non ESS HDRs Valves SW-29 & 30
SWS-XHE-XM-NONESS	Operator Fails to Start SWS MDPs Given a LOOP Or SI

Uncertainty: The analyst performed an uncertainty quantification for the pipeline failure event tree using Monte Carlo sampling with 5,000 random samples. Table 3 below presents the results of this analysis. It should be noted that even the tails of the uncertainty analysis are well below actionable levels.

Table 3. Uncertainty quantification for risk assessment.

	Unit 2	Unit 3
Sample size	5,000	5,000
Events	177	196
Cutsets	917	846
Point estimates	1.63E-08	1.60E-08
Mean value	2.19E-08	2.02E-08
5th percentile	5.43E-11	3.89E-11
95th percentile	8.56E-08	8.31E-08
Median value	6.72E-09	4.86E-09

C.4. Sensitivity Studies

Two sensitivity studies were performed for this analysis: one on the consequences of overpressurization and the other on the initiating event frequency.

Overpressurization Study

Because of the uncertainty associated with the consequences of overpressurization from an explosion, the team conducted an analysis assumed more equipment and structural failures. Specifically, the team assumed that all equipment not in a seismic Category I structure (i.e., not located in the primary auxiliary building, diesel generator building, or reactor containment), such as balance of plant systems and the Appendix R diesels, was lost upon the postulated pipeline rupture. The seismic Category I buildings are designed to withstand a pressure drop of 3 psi[197], and it is assumed that the overpressurization at those locations would not exceed this value.

For Unit 2, the change in core damage frequency for this scenario was 1.6×10^{-8}. This remains well below the agency's threshold for a "small" change in risk of one in a million years.

For Unit 3, the change in core damage frequency for this scenario was 1.7×10^{-8}. This remains well below the agency's threshold for a "small" change in risk of one in a million years.

Frequency Study

Based on PHMSA's data, there was some concerns that because of the calculated frequency is based on a mileage that included all diameters of pipes, not just large pipes, that it may be non-conservative. The analyst performed an independent data analysis based on publicly available data.[198] For the last 10 years, the analyst determined that the failure frequency for ruptures in Class 2, 3, or 4 carbon steel transmission lines having pipe diameters greater than or equal to 20 inches and maximum operating pressure greater than or equal to 300 psig is 2.4×10^{-5} per mile per year. The failure data show that, over a period of 10 years, 26 ruptures occurred across 45501.75 miles of pipeline, and 42 percent of these ruptures occurred on pipes that were larger than 20 inches.

C.5. The risk results considering higher failure frequency value are still well below the agency's threshold for a small change. Summary

The analysis shows that the risk of a gas pipeline rupture is of very low safety significance both as defined in the significance determination process and based on the definitions in Regulatory Guide 1.174. The results for each model can be seen below in Table 4.

Table 4. Results of sensitivity studies.

Model	Δ CDF
Unit 2 base case	1.6×10^{-8}
Unit 2 frequency sensitivity	2.0×10^{-8}
Unit 2 overpressure sensitivity	1.6×10^{-8}
Unit 3 base case	1.6×10^{-8}
Unit 3 frequency sensitivity	2.0×10^{-8}
Unit 3 overpressure sensitivity	1.7×10^{-8}

Analyst: Suzanne Dennis Date: March 28, 2020

Reviewed By: Jeffery Wood Date: March 30, 2020

Appendix D. Pipeline Rupture Data from PHMSA

Table 5 below presents onshore gas transmission incident data for 2002-2019 obtained from the Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA), as of March 3, 2020. The selected incidents are leaks or ruptures in Class 2, 3, or 4 piping having pipe diameters greater than or equal to 20" and maximum operating pressure greater than or equal to 300 psig. From 2002 to 2019, incidents were categorized as pipeline ruptures in the body of the pipe or pipe seam. From 2010 to 2019, incidents were categorized as pipeline ruptures in the pipe body, pipe seam, or girth weld.

Table 5. Pipeline rupture incidents obtained from PHMSA.

Year	LEAK	RUPTURE	LEAK or RUPTURE
2002	3	1	4
2003	1	1	2
2004	4	1	5
2005	2	0	2
2006	2	1	3
2007	2	2	4
2008	0	1	1
2009	2	0	2
2010	0	2	2
2011	1	0	1
2012	2	1	3
2013	0	0	0
2014	3	3	6
2015	0	0	0
2016	0	0	0
2017	1	1	2
2018	1	1	2
2019	0	0	0

Based on 2018 information (the most recent available), there were a combined 45,501.75 miles of pipeline in the United States categorized as Class 2, 3, and 4 piping, with a ratio of stress at maximum allowed operating pressure to specified minimum yield strength of greater than 30 percent. Pipelines of a diameter greater than 20" in diameter, as included in the incidents above, would be subset of this mileage. (See Section C.4 for a sensitivity study related to this data.) PHMSA does not have data on mileage of specific piping classes and diameters combined.

Appendix E. Peer Review of This Report

The evaluation team requested a peer review of this report by Dr. Peter Riccardella, a member of the NRC's Advisory Committee on Reactor Safeguards. Dr. Riccardella has more than 45 years' experience working on the structural integrity of nuclear power plant components. He is an authority in the application of fracture mechanics to nuclear pressure vessels and piping and has made significant contributions to the diagnosis and correction of materials degradation concerns at operating plants. He has been a principal investigator on a number of Electric Power Research Institute projects and served more than 20 years as a member of the American Society of Mechanical Engineers Subcommittee on Nuclear Power Plant Inservice Inspection. Dr. Riccardella earned his bachelor's, master's and doctorate degrees in mechanical engineering from Carnegie Mellon University, and is a Fellow and Life Member of the American Society of Mechanical Engineers.

The team incorporated most of Dr. Riccardella's detailed suggestions into the final version of this report. Dr. Riccardella's general comments on the report are included below for completeness.

As referenced in Section 2.1.1, Dr. Riccardella noted that:

> ...the method used to establish the initiating event frequency, although based on actual data, does not have a high degree of statistical confidence or relevance to the AIM pipeline. The data are a limited sample, and there were likely different causes and conditions associated with each of the fifteen rupture events (seam weld manufacturing defects/low toughness, external corrosion, stress corrosion cracking, and third-party damage are the more common ones). And these conditions are not directly applicable to the subject AIM pipeline. Most, if not all, of these failures were likely in legacy pipelines, manufactured to less rigorous standards than current practice and have been subjected to many years of potential in-service degradation. This is especially true for the ~4000 ft of enhanced AIM pipeline in closest proximity to [Indian Point]. Therefore, although there is a high degree o[f] uncertainty in the assumed initiating event frequency, it is likely that the uncertainty is in the direction of making this estimate much higher than the true rupture frequency of that pipeline segment.

The team agrees. As noted in Appendix C, the initiating event frequency used by the team is likely higher than a more detailed realistic data analysis would show. As the risk numbers are much lower than the agency's threshold for action, the team did not perform a detailed data analysis to estimate a lower pipeline failure frequency.

Dr. Riccardella also noted that:

> RG 1.174 also states that 'If the application clearly shows a decrease in CDF, the change will be considered to have satisfied the relevant principle of risk-informed regulation'. My understanding is that the 42" AIM pipeline replaced two existing legacy pipelines closer to the IPEC site, which were subsequently retired in place. If this is true, then the modification to the licensing basis clearly can be shown to satisfy this criterion, since the initiating event frequency would have been much higher for the legacy pipelines than for the new one, and the consequences were also likely to have been higher.

Appendix F. Biographies of Evaluation Team Members

David Skeen (team lead) is a member of the Senior Executive Service and has served as the Deputy Director of the Office of International Programs since June 2014. From 2011 to 2014, he served as the Director of the Japan Lessons-Learned Directorate leading the agency's response to the Fukushima Dai-ichi accident. He first joined the NRC in 1991 as a reactor systems engineer and served in a number of progressively responsible technical, policy, and management positions at the staff and Commission staff levels. Prior to joining the NRC, Mr. Skeen worked in the electrical construction industry for 15 years on large industrial projects, including both fossil and nuclear power plants. Mr. Skeen received a bachelor's degree in electrical engineering from West Virginia University.

Theresa Clark (deputy team lead) has served as the Deputy Director of the Division of Rulemaking, Environmental, and Financial Support since November 2017. She is a member of the NRC's Senior Executive Service Candidate Development Program. Ms. Clark joined the NRC in 2004 and has served in progressively responsible positions, including as an Executive Technical Assistant providing technical and policy advice to the agency's senior executives, the chief of the Mechanical Engineering Branch in the Office of New Reactors, and a reliability and risk analyst. Ms. Clark earned bachelor's and master's degrees in materials science and engineering from the University of Maryland.

Dr. Yueh-Li (Renee) Li is a senior mechanical engineer in the NRC's Office of Nuclear Reactor Regulation. She is an agency expert in the review of piping design and pipe break hazard analysis for new nuclear power plants. Dr. Li joined the NRC in 1980 as a mechanical engineer. Prior to joining the NRC, Dr. Li was a senior stress analyst and senior nuclear staff at Bechtel Power Corporation for four years. She earned a Ph.D. degree in mechanical engineering and a master's degree in nuclear engineering from The Catholic University of America and a bachelor's degree in nuclear engineering from National Tsinghua University in Taiwan.

Suzanne Dennis is a Risk and Reliability Engineer in the Office of Nuclear Regulatory Research. She joined the NRC in the Office of New Reactors as a Risk and Reliability Analyst in 2009 and has developed specialized expertise in the area of external hazard risk analysis. She holds a bachelor's degree in nuclear engineering from Missouri University of Science and Technology and a master's degree in reliability engineering from the University of Maryland.

Brian Harris, Esq. is the Deputy Assistant General Counsel for Reactor and Materials Rulemaking and was previously the Acting Assistant General Counsel for Operating Reactors. Mr. Harris joined the NRC in 2009 as a staff attorney and was the lead legal advisor for the agency's response to the accident at the Fukushima Dai-ichi nuclear power plant. Before joining the NRC, he was an associate at Townsend, Townsend & Crew and Pillsbury Winthrop Shaw Pittman. Mr. Harris's previous work experiences include the U.S. Navy as a nuclear-trained surface warfare officer and as part of the Joint Staff for the J-2, Director of Intelligence. Mr. Harris earned a law degree from the University of Richmond School of Law and bachelor's degree in chemical engineering from Brigham Young University.

Steve Nanney has worked in for the past 15 years in the Engineering and Research Division of the Pipeline and Hazardous Materials Safety Administration (U.S. Department of Transportation). Mr. Nanney has worked on the development and implementation of his agency's Integrity Management Program, rulemakings, special permits, stakeholder outreach, and pipeline research programs. He previously worked in industry for 29 years, including operations, design, construction, and marketing of gas and liquid pipelines. His industry experience also includes U.S. offshore drilling and gas production operations and several years of greenfield development of gas pipelines outside

the United States. Mr. Nanney has a bachelor's degree in civil engineering from the University of Mississippi and a master's degree in petroleum engineering from the University of Houston. He is a registered professional engineer in Texas.

Dr. Anay Luketa is a Principal Member of Technical Staff at Sandia National Laboratories in the Fire Science and Technology Department. She serves as test director of large-scale fire experiments and performs numerical analysis. Her area of expertise pertains to analysis, utilizing computational tools for applications that span turbulent reacting and non-reacting flow, solid mechanics, and shock-physics. Specific applications have involved pool fire, blast, and dispersion calculations for hazard analysis involving liquefied natural gas, as well as fires involving composites, propellants, and other hydrocarbons. She was the lead technical author of guidance reports addressing risk management of large liquefied natural gas carriers. She has bachelor's degrees in mathematics and in psychology from Seattle University, and a master's degree and Ph.D. in mechanical engineering from the University of Washington.

Commented [LA16]: These biographies should be put in the Sandia memo.

Dr. Chris LaFleur is the program lead for Hydrogen Safety, Codes, and Standards at Sandia National Laboratories in Albuquerque, NM, where she is responsible for the fire risk program activities and conducting research on the fire risks of emerging energy technologies. Before joining Sandia, she worked at General Motors and Parsons Engineering Science. Dr. LaFleur earned bachelor's degrees in geology and mechanical engineering from the University of Rochester, a master's degree in fire protection engineering from the University of Maryland, and a doctorate of engineering in manufacturing engineering from the University of Michigan. She is a licensed professional engineer.

Jamal Mohmand is a Member of the Technical Staffat Sandia National Laboratories. Mr. Mohmand has several years of experience of building fire risk models. In particular, Mr. Mohmand's expertise lies in plant partitioning, ignition frequency, fire scenario selection, quantification, uncertainty analysis, and model integration. Mr. Mohmand has helped build and maintain several fire risk models for plants across the country. Mr. Mohmand has participated in peer reviews, plant walkdowns, significance determination process responses, and safety reviews of probabilistic risk assessment models. He graduated from Texas A&M University with a Bachelor of Science in Radiological Health Engineering in 2017.

Appendix G. Figures

Figure 1. Aerial view of the Indian Point Energy Center on the east side of the Hudson River. This view shows the Unit 2 containment and turbine building on the left, the Unit 1 containment in the center, and the Unit 3 containment and turbine building on the right. (Some older aerial photos show a red and white stack associated with Unit 1; it has been removed and only the white base is showing to the left of Unit 1.)

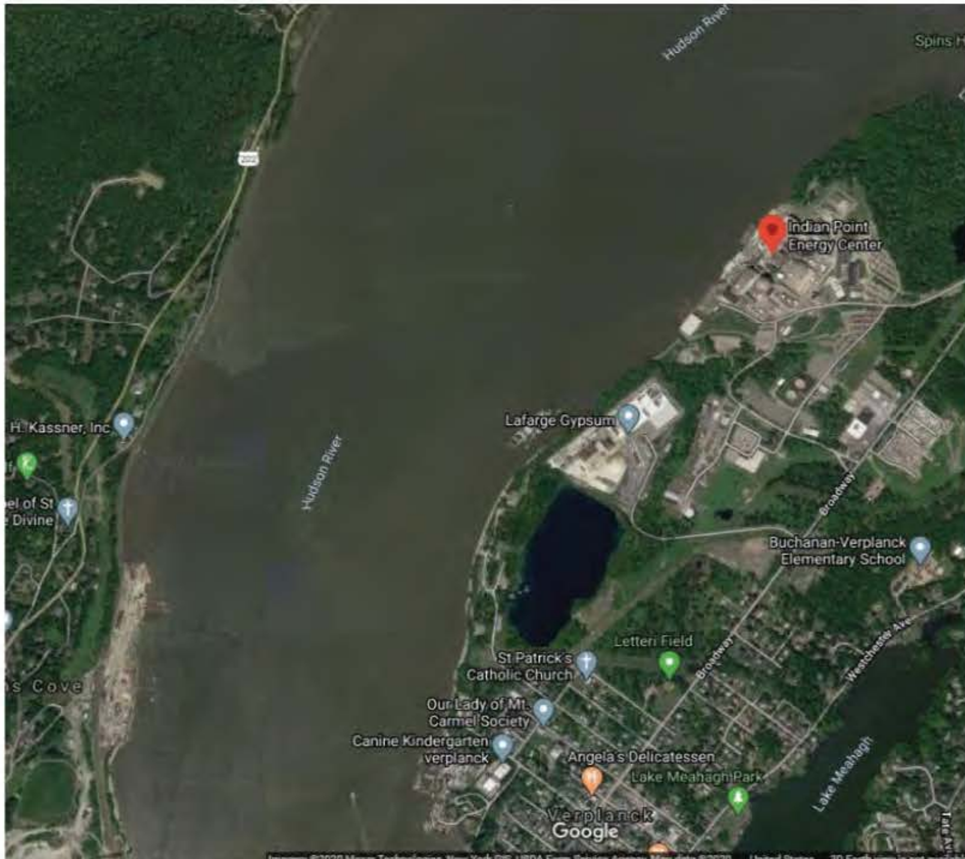


Figure 2. Satellite map view of Indian Point Energy Center (near top right). Southwest of the plant (marked Lafarge Gypsum) is a gypsum plant not associated with the nuclear power plant. (Imagery ©2020 Maxar Technologies, New York GIS, USDA Farm Service Agency, Map data ©2020 Google.)

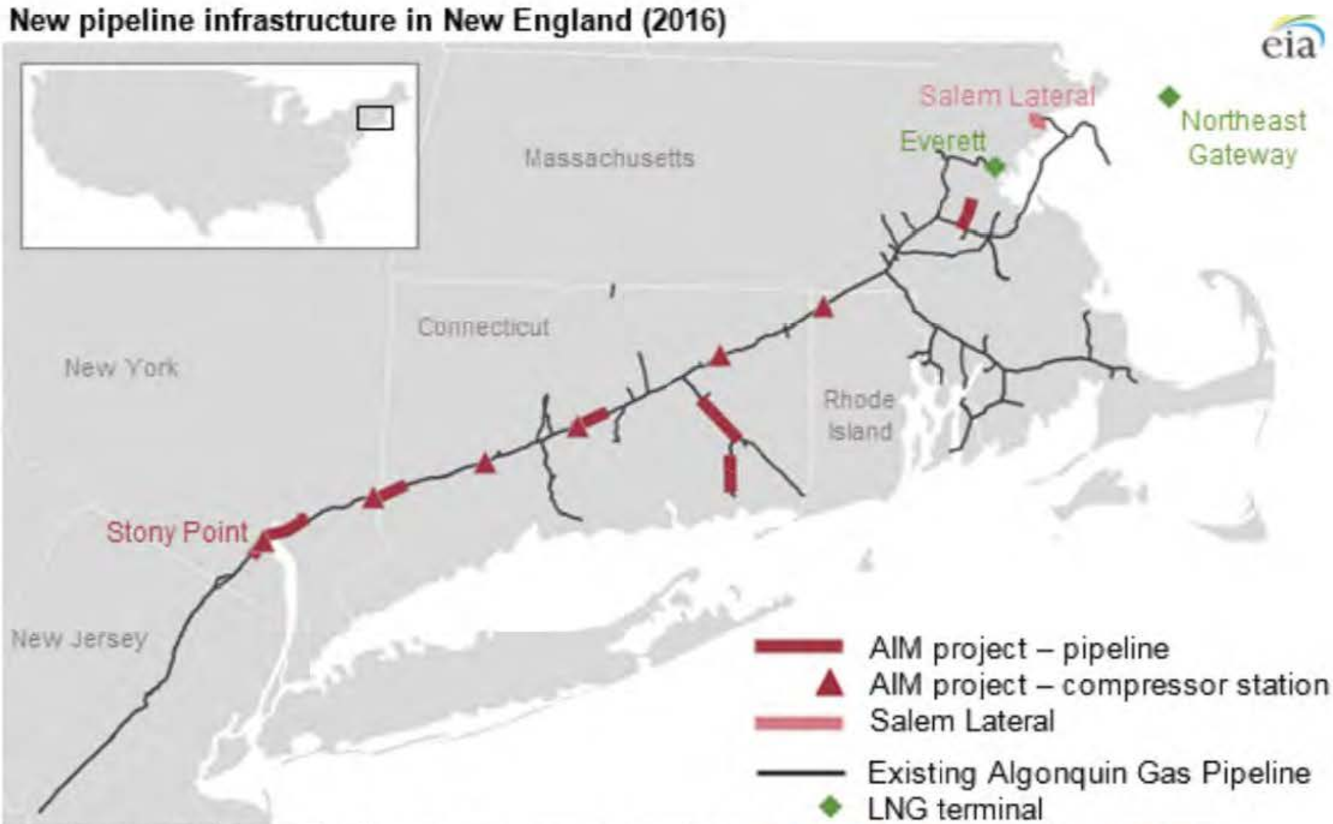


Figure 3. Overview of AIM pipeline infrastructure. Source: U.S. Energy Information Administration (https://www.eia.gov/todayinenergy/detail.php?id=29032).

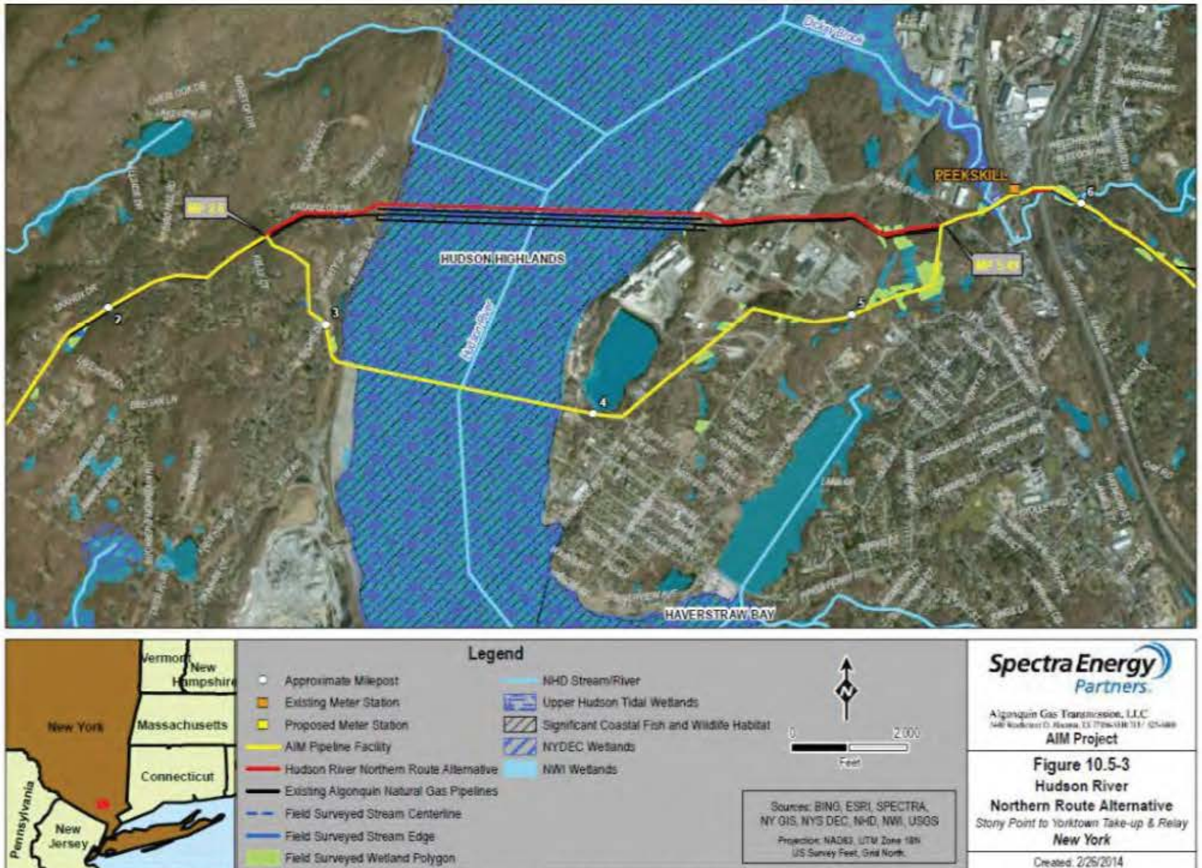


Figure 4. Figure 10.5-3 from the AIM application, showing the pipeline route in yellow and the alternative (not selected) for a northern route through the Indian Point site in red.

Figure 5. View of the 42-inch AIM pipeline from near Indian Point. At left is a view of the right of way from a cemetery southeast of Indian Point. The pipeline area can be identified by the lighter grass beyond the trucks on the opposite side of the road (Broadway); the Indian Point SOCA is well outside the frame to the right; the red and white tower is the meteorology tower that Entergy assessed for pipeline rupture impacts. At center is a view of the right of way from within the Indian Point property. The pipeline area can be identified by the lighter grass beyond the fence (behind the white items); the Indian Point SOCA is well behind the viewer and to the left of the frame. The photos show the hilly terrain near the site, with the pipeline in a low area. The image at right shows the Indian Point site near the top, blue dot with the location where the center photo was taken, and cemetery in the clear area near the bottom right. The pipeline area can be identified by the clear-cut through the trees; the Buchanan switchyard is just to the right of the frame where the road (Broadway) intersects the edge of the image. The photos were taken by the team on March 12, 2020. (Right image: Imagery ©2020 Maxar Technologies, New York GIS, USDA Farm Service Agency, Map data ©2020 Google.)

Figure 6. Images of above-ground connections where the 26-inch, 30-inch, and 42-inch pipelines connect, east of Indian Point. These photos were taken by the team on March 12, 2020.

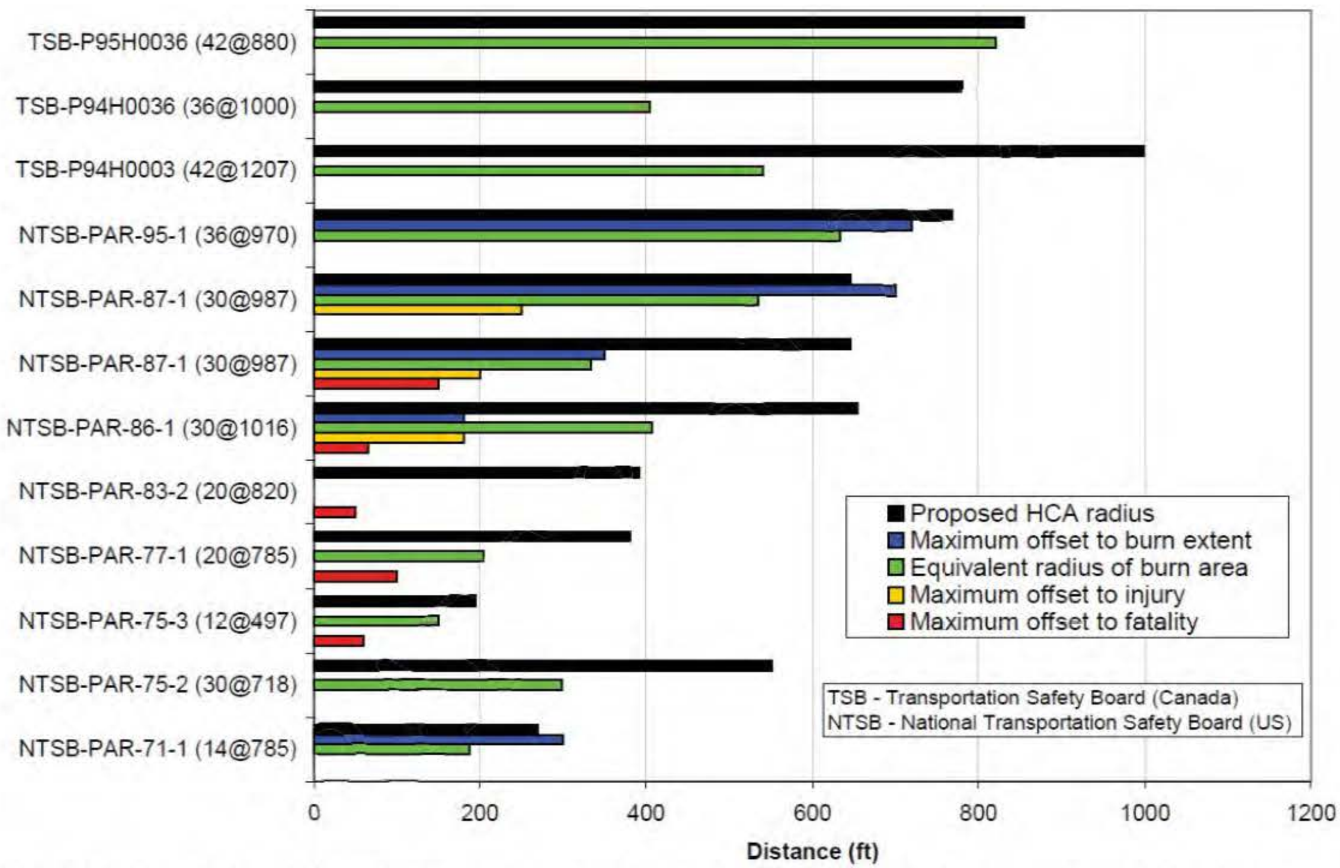
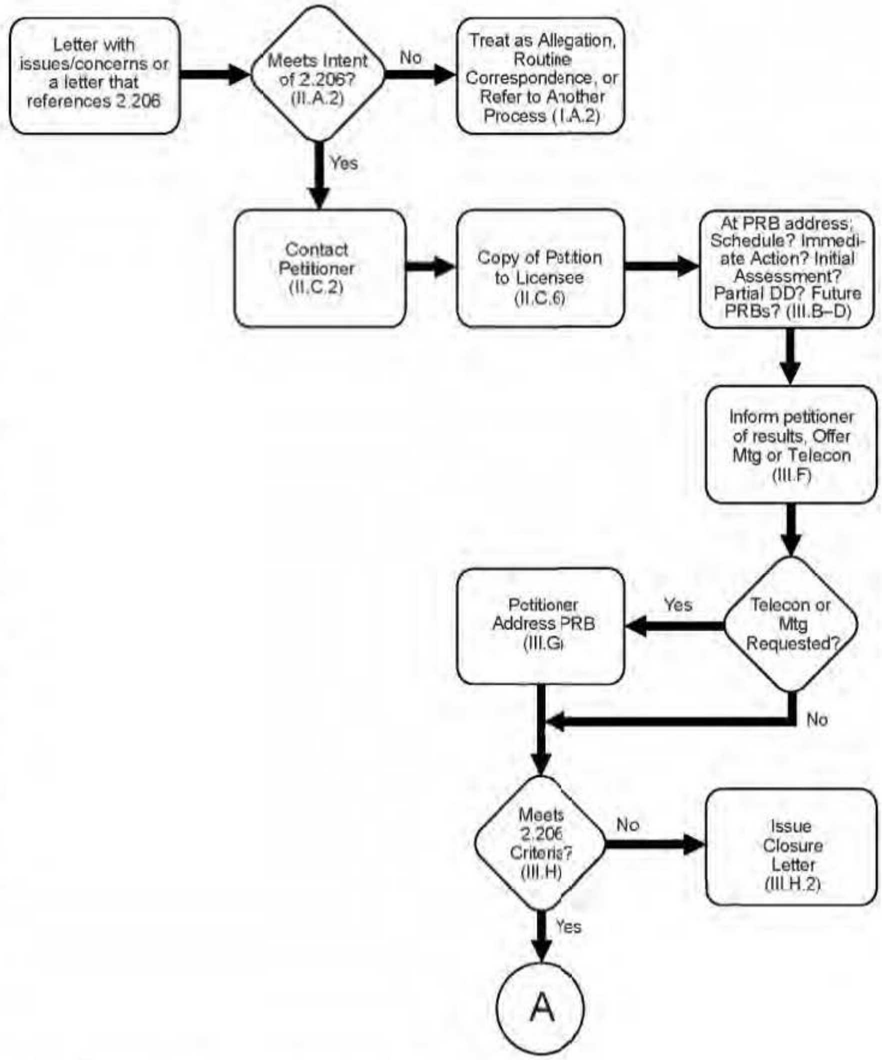


Figure 7. Figure 3.1 from Gas Research Institute / C-FER report comparing pipeline rupture damage areas to a proposed high consequence area (HCA) hazard area radius, which became the potential impact radius in Department of Transportation regulations.

Figure 8. Pipeline rupture accident images obtained from PHMSA. Accident sites are: (1) Appomattox, VA in 2008, (2) Artesia, NM in 2019, (3) Danville, KY in 2019, and (4) Moundville, OH in 2018.



1. Parenthetical Information is associated Guide paragraph number

Figure 9. Simplified process flowchart (1 of 2) from NRC desktop guide on 10 CFR 2.206 petition reviews (Exhibit 1).

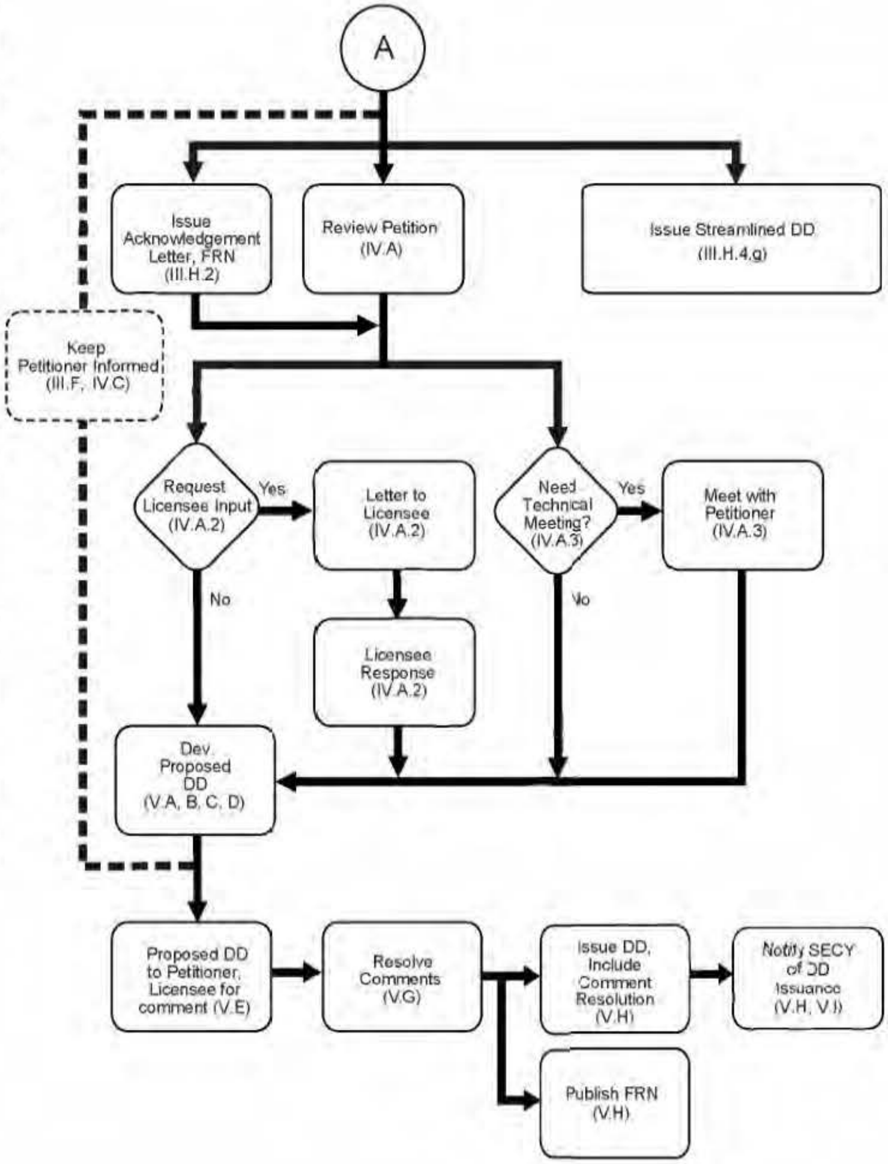


Figure 10. Simplified process flowchart (2 of 2) from NRC desktop guide on 10 CFR 2.206 petition reviews (Exhibit 1)

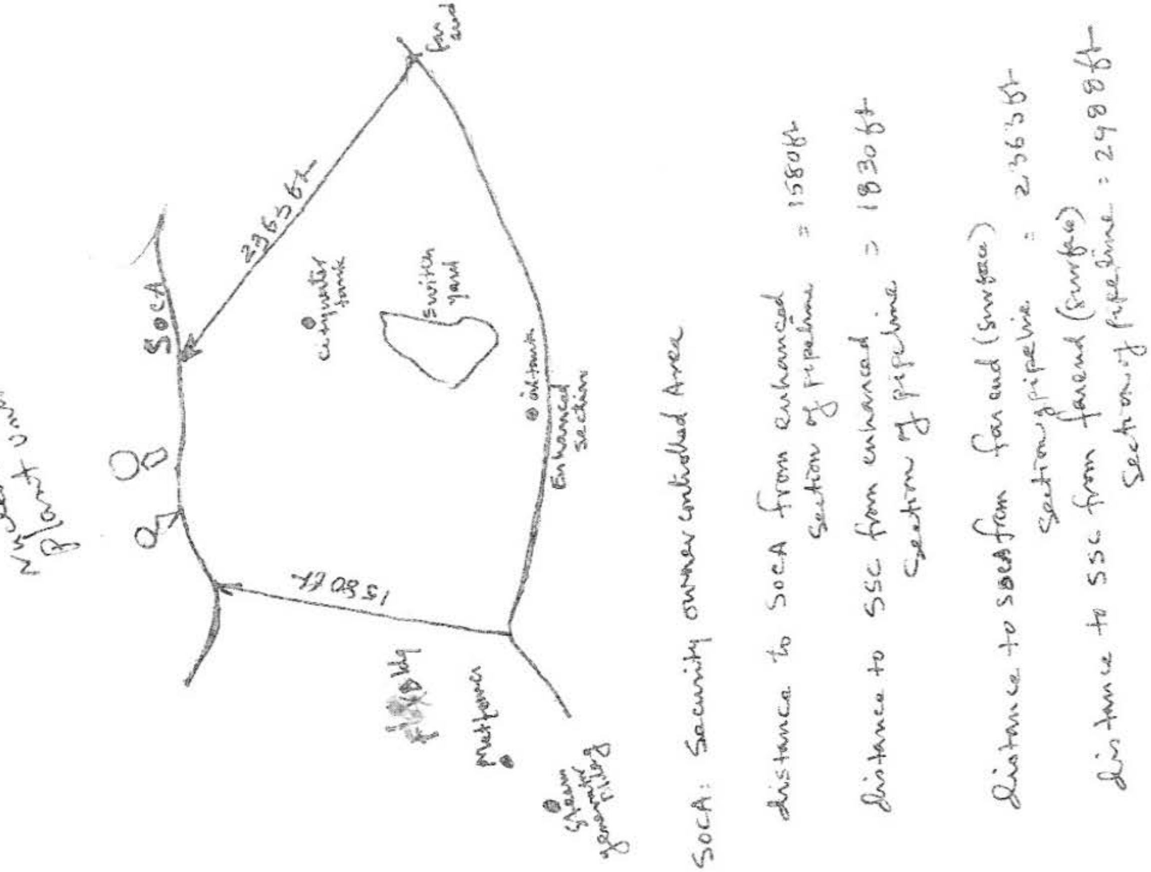


Figure 11. Sketch prepared by NRC analyst in conducting sensitivity study for PRB on 3-minute isolation valve closure time for AIM pipeline.

Note: Blacked out content appears in the original; it is not a FOIA redaction.

SUMMARY OF RESULTS

SOCA : Security owner control A[illegible]
SSC : Structure, system and compo[illegible]

Scenario	Minimum safe Distance to 1 PSI (Distance to SOCA) ((Distance to SSC))	Heat flux kw/m² at SOCA Distance of 1580 ft
pipe burst with unbroken end closed (valve closed) RG 1.91 (Direct explosion)	2351 ft (2362 ft) (([redacted] ft))	—
pipe burst with unbroken end connected to infinite source (valve open)	2509 ft (2363 ft) (([redacted] ft))	—
vapor plume explosion with no congestion	No explosion	—
pipe burst with unbroken end closed	—	4.05
pipe burst with unbroken end of pipe connected to infinite source	—	4.03

Figure 12. Image showing handwritten results of sensitivity study conducted by NRC analyst at the request of the PRB. The team redacted the "distance to SSC" as potentially security-related information, though similar information may exist in other documents.

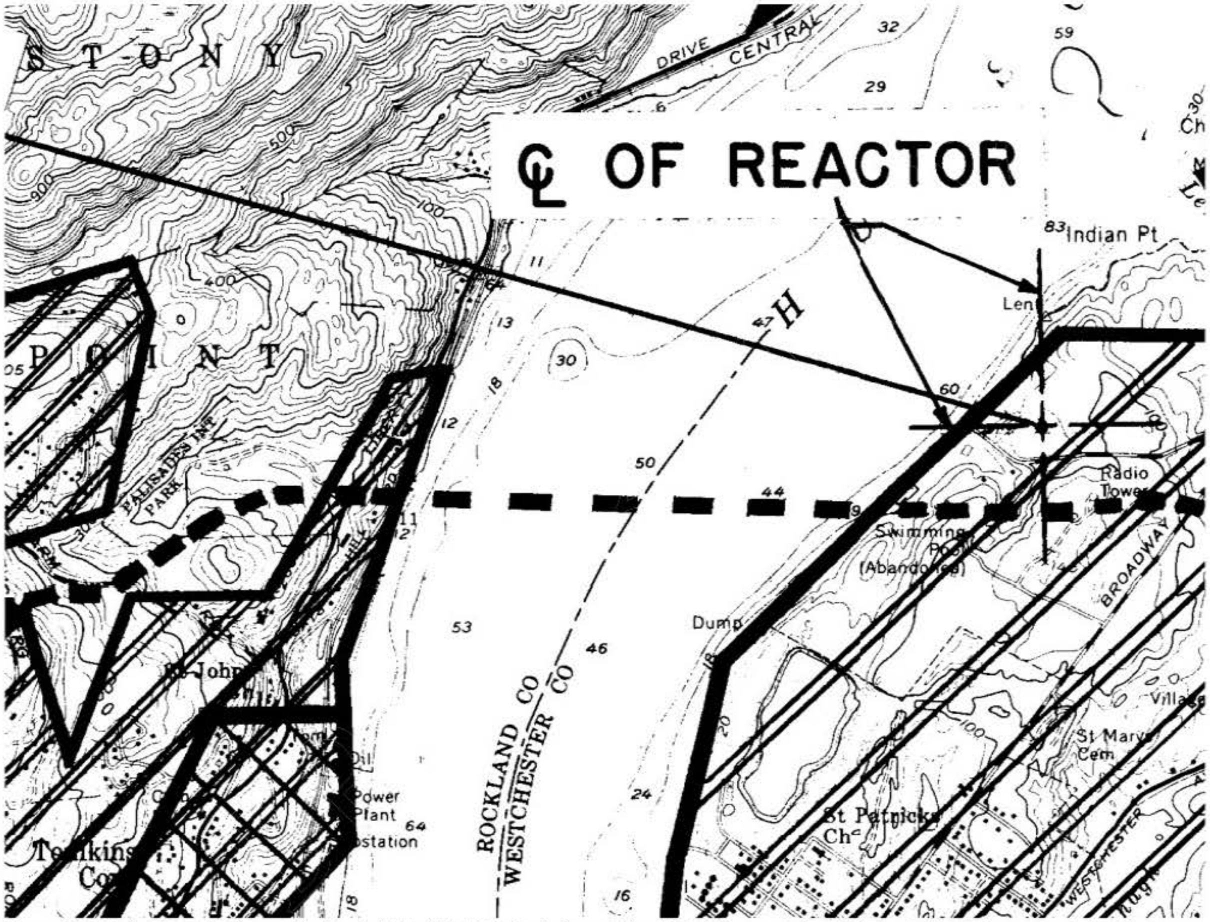


Figure 13. Selection from 1960 map of Indian Point Unit 1 vicinity, including public utilities. The preexisting 26-inch pipeline is shown as a dashed line.

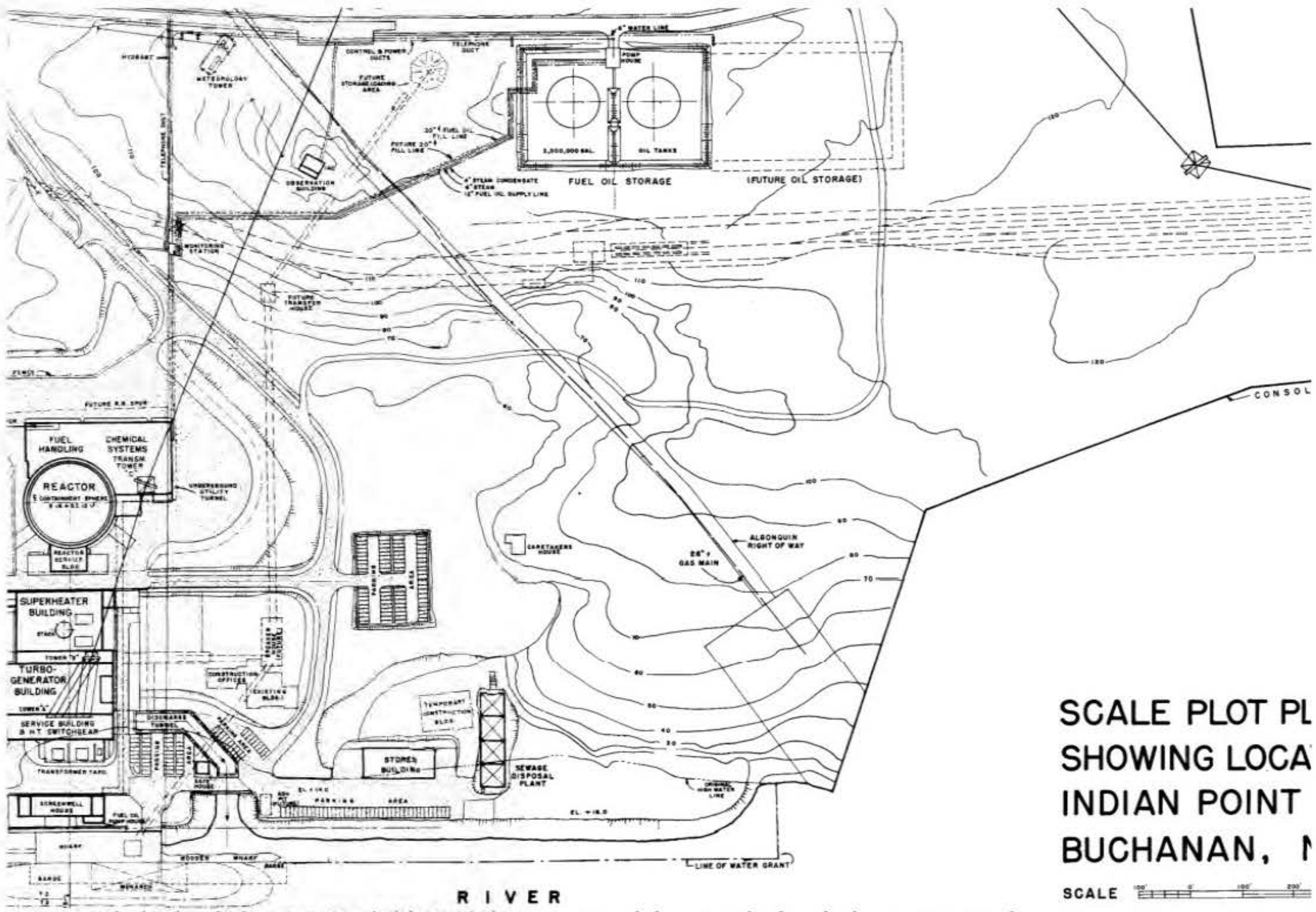


Figure 14. Scale plot plan of Indian Point Unit 1 (Exhibit H-14), showing reactor and Algonquin right of way for the preexisting 26-inch gas main.

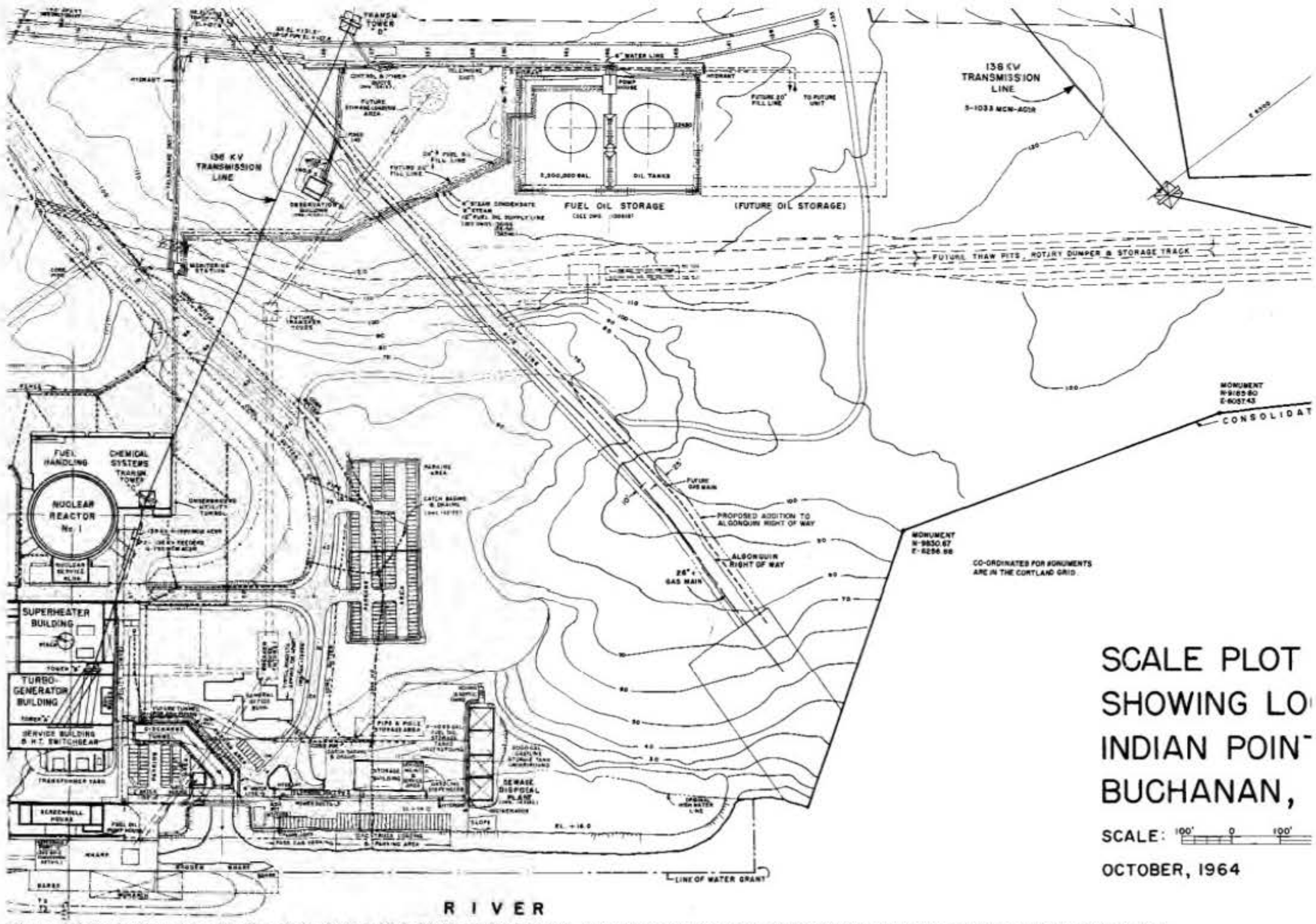


Figure 15. Scale plot plan of Indian Point Unit 1 (Exhibit H-14, Revision 2), showing right of way for the 26-inch gas main and the proposed 30-inch line.

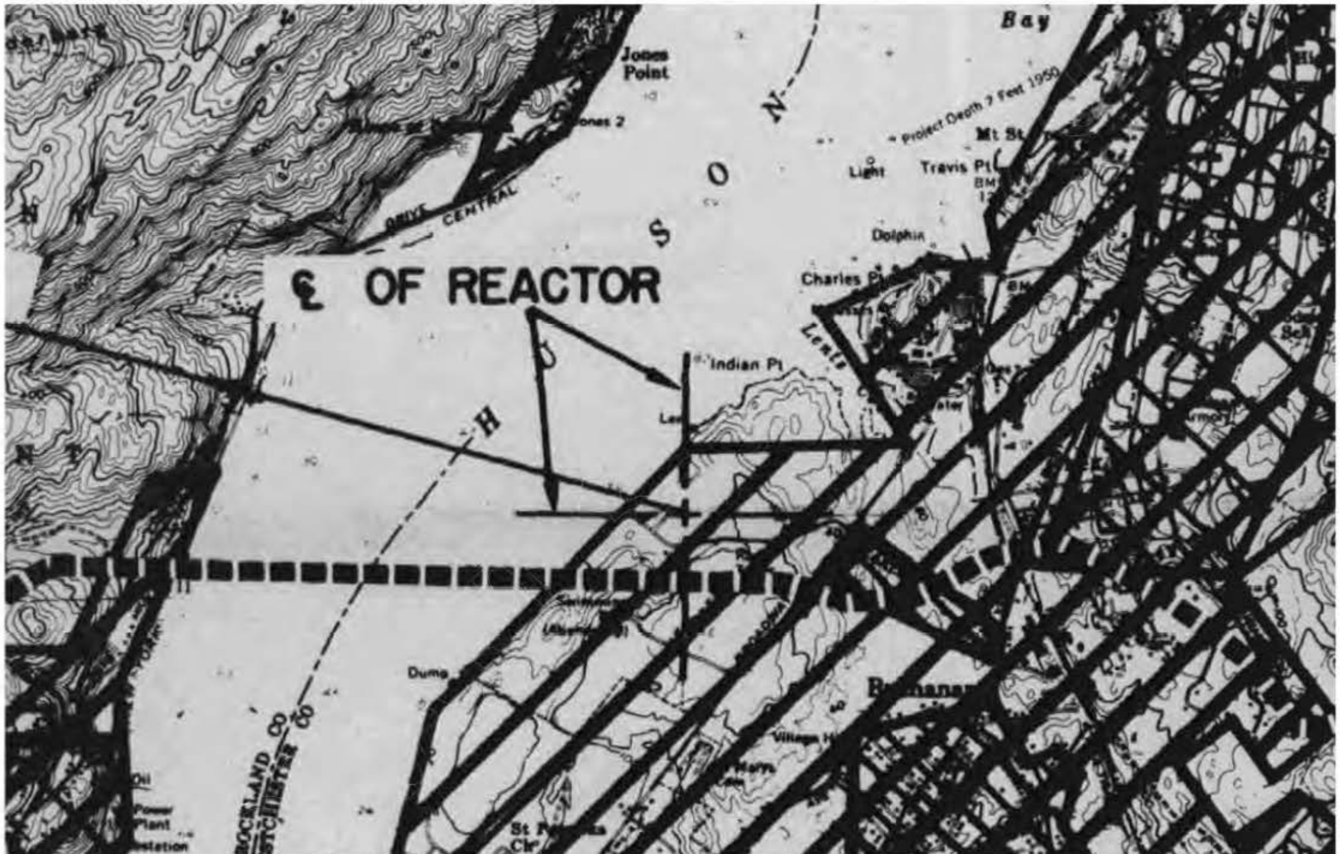


Figure 16. Portion of Indian Point Unit 2 PSAR Figure 1.4-4, showing reactor and Algonquin gas transmission lines (two) designated by dashed black line.

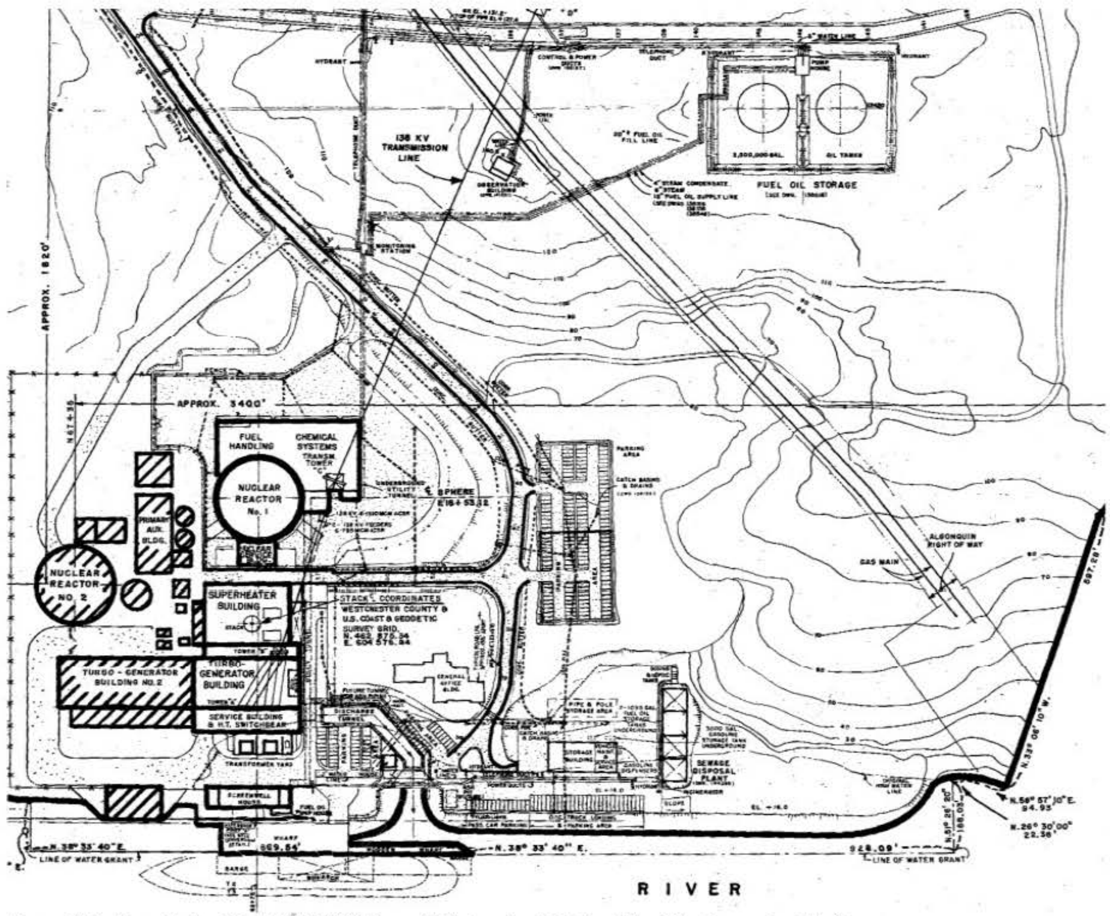


Figure 17. Section of Indian Point Unit 2 PSAR Figure 1.2-2, showing Units 1 and 2 and the Algonquin right of way.

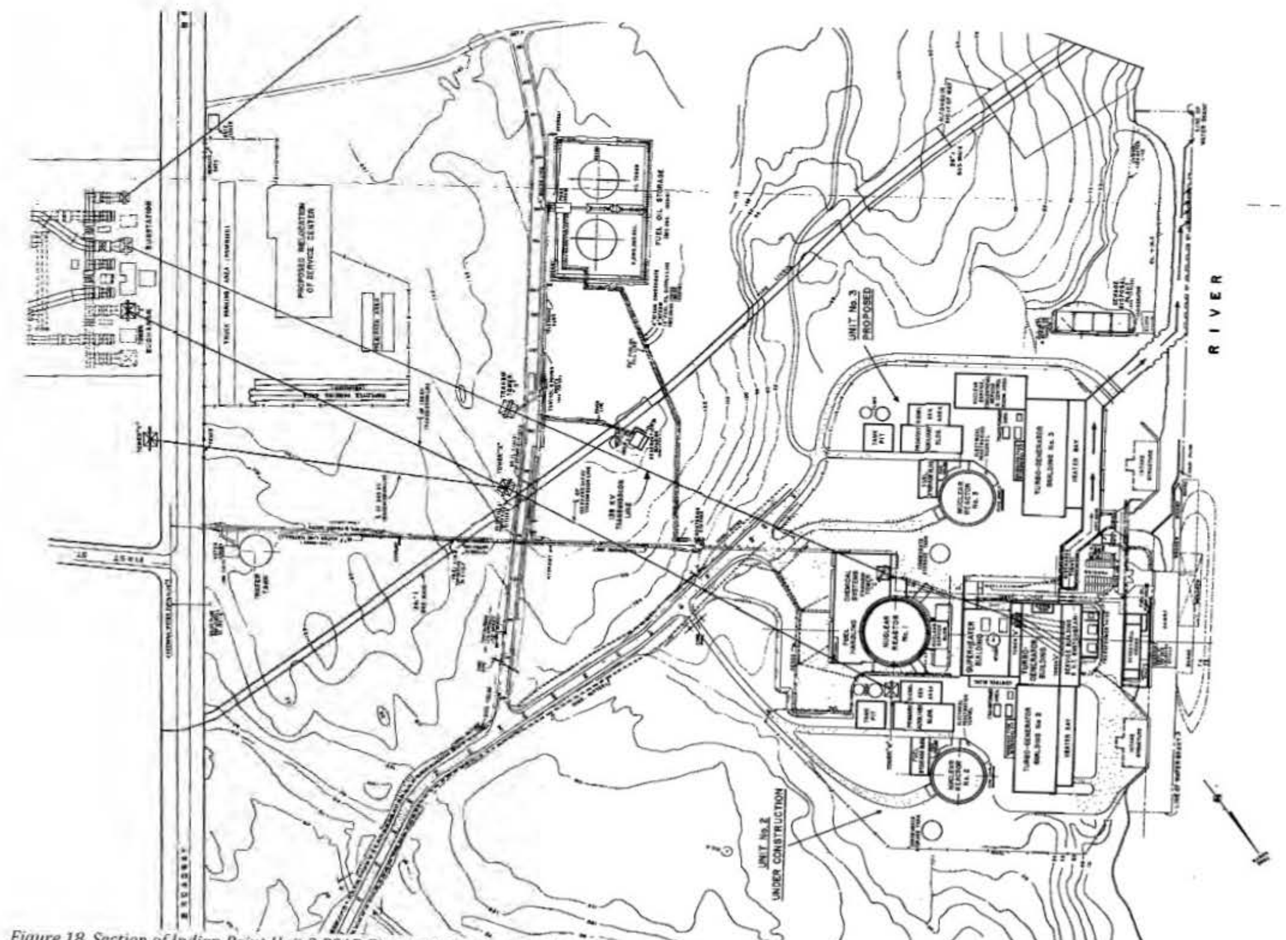


Figure 18. Section of Indian Point Unit 3 PSAR Figure 1.2-2, showing all three reactors and the Algonquin right of way (rotated counterclockwise from Unit 1 and 2 images).

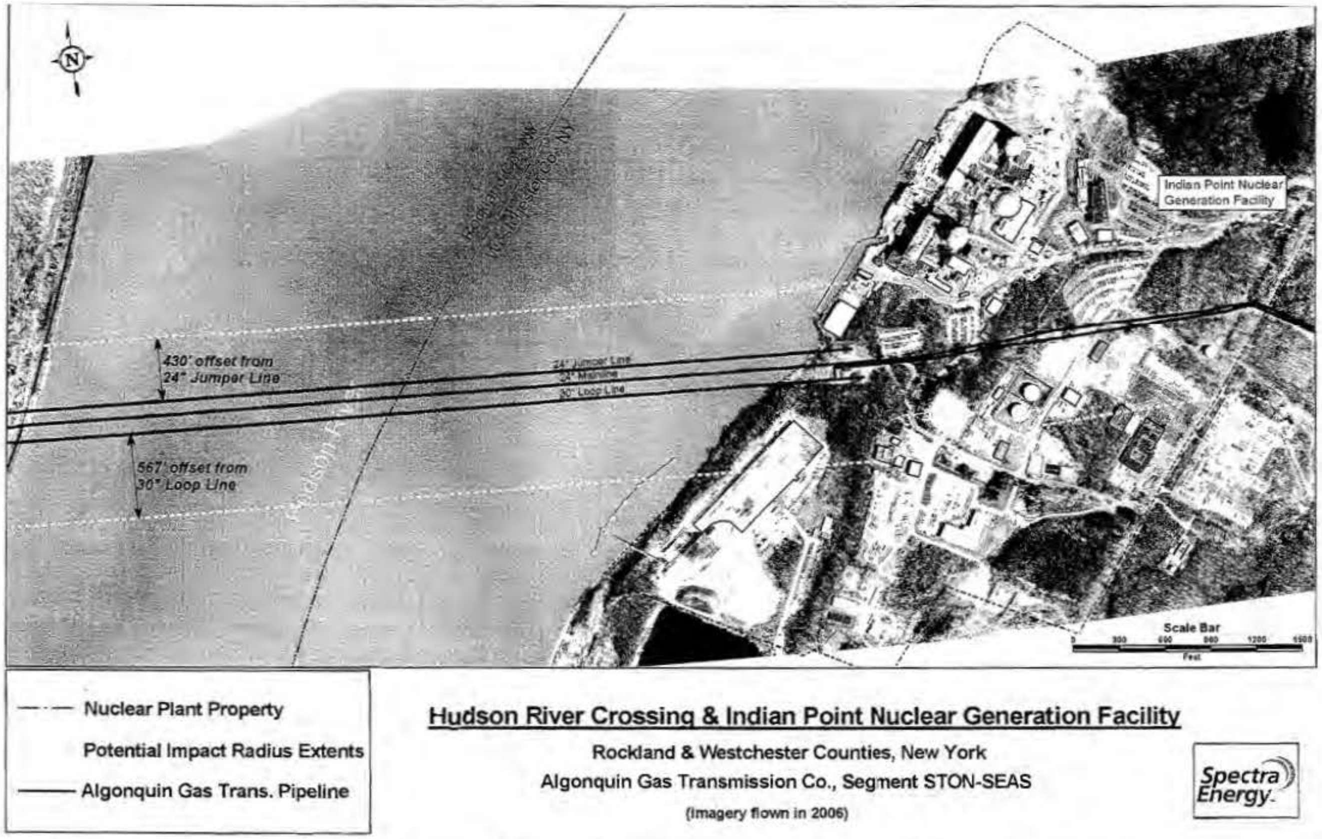


Figure 19. Section of Indian Point Unit 2 Updated FSAR Figure 2.2-3, showing the Hudson River crossing of the preexisting pipelines, the "potential impact radius"[199] extent in white dotted lines, and the Indian Point facility north of the pipelines.

Appendix H. Chronology of Events and Documents Related to Indian Point Pipeline Review

Date	Category	Activity	Reference
1968-08-30	Licensee Review / Analysis	Consolidated Edison concludes in Indian Point Unit 3 preliminary safety analysis report Supplement 1 that pipeline fire will not endanger Unit 3, references 4-minute automatic isolation	ML093480204
1973-09-21	U.S. Nuclear Regulatory Commission (NRC) Review / Analysis	U.S. Atomic Energy Commission concludes in Indian Point Unit 3 operating license safety evaluation report that pipeline failure will not impair safe operation	ML072260465
1975-01-31	NRC Guidance	NRC issues Revision 0 to Regulatory Guide 1.91	ML12298A133
1978-02-28	NRC Guidance	NRC issues Revision 1 to Regulatory Guide 1.91	ML003740286
1982-03-05	Licensee Review / Analysis	Power Authority of the State of New York and Consolidated Edison submit Indian Point Probabilistic Safety Study to NRC	ML093430890
1982-12-31	NRC Review / Analysis	NRC completes review of Indian Point Probability Safety Study (NUREG/CR-2934), including heat flux and missiles from pipeline explosions/leaks	ML091540534
1983-01-21	Licensee Review / Analysis	Power Authority of the State of New York and Consolidated Edison submit Amendment 1 to Indian Point Probabilistic Safety Study to NRC, updating several analyses (but not pipeline)	ML093431170
1984-04-02	Licensee Review / Analysis	Consolidated Edison and Power Authority of the State of New York submit Amendment 2 to Indian Point Probabilistic Safety Study to NRC, updating several analyses (but not pipeline)	ML100321844
1995-12-06	Licensee Review / Analysis	Consolidated Edison screens pipeline failure out of Indian Point Unit 2 Individual Plant Examination for External Events (IPEEE) based on low frequency, notes that automatic shutoff valves had been removed	ML11227A100
1997-09-26	Licensee Review / Analysis	New York Power Authority screens pipeline vapor cloud explosion out of Indian Point Unit 3 IPEEE based on low frequency	ML11227A102
1999-05-14	NRC Review / Analysis	NRC issues safety evaluation of IP2 IPEEE, noting that natural gas pipeline accidents were screened based on frequency	ML090130608
2000-10-25	10 CFR 2.206	NRC updates Management Directive 8.11 on Title 10 of the *Code of Federal Regulations* (10 CFR) 2.206 petition reviews (most recent update before pipeline-related petitions)	ML041770328

Date	Category	Activity	Reference
2001-02-15	NRC Review / Analysis	NRC transmits Indian Point Unit 3 IPEEE safety evaluation to Entergy, noting evaluation and walkdowns of pipeline	ML11227A103
2003-04-25	NRC Review / Analysis	NRC documents review regarding safety hazard of exposed natural gas pipelines near the Hudson River shoreline	memo: ML11223A040 (public) enclosure: ML031210213 (non-public)
2007-02-28	NRC Guidance	U.S. Environmental Protection Agency and National Oceanic and Atmospheric Administration issue ALOHA User's Manual	https://nepis.epa.gov/
2008-03-12	NRC Review / Analysis	NRC issues Request for Information RI-2008-A-021 on gas pipelines	non-public (not in ADAMS)
2008-03-28	Licensee Review / Analysis	Entergy completes safeguards analysis for pipeline explosion near Indian Point Unit 3	NS107994 (non-public, safeguards)
2008-04-12	Licensee Miscellaneous	Entergy changes licensee-controlled documents to remove gas turbine references and add station blackout and Appendix R diesel for Indian Point Unit 2	ML090410062
2008-04-23	Licensee Review / Analysis	Entergy provides initial response to RI-2008-A-021 on gas pipelines	non-public (not in ADAMS)
2008-05-12	NRC Guidance	NRC/Office of Nuclear Reactor Regulation (NRR) issues office instruction ADM-405, "NRR Technical Work Product Quality and Consistency," Revision 1	ML072750452 (non-public)
2008-09-30	Licensee Review / Analysis	Entergy provides supplemental analysis to RI-2008-A-0021 on gas pipelines, enclosing 08/14/2008 Risk Research Group analysis	letter: (non-public, not in ADAMS) enclosure: ML103140627 (non-public)
2008-10-20	Licensee Misc	Entergy updates Indian Point Unit 2 final safety analysis report to correct references to gas pipelines	Chapter 2: ML083390226 (non-public)
2009-10-13	Licensee Misc	Entergy updates Indian Point Unit 3 final safety analysis report to include 2008 pipeline analysis information	Chapter 2: ML093430729 (non-public)
2010-04-12	Correspondence / Meetings	NRC responds to 03/04/2010 email from Paul Blanch re: Indian Point pipeline "unanalyzed condition," referencing 2008 and earlier analyses	ML101020487
2010-05-27	Licensee Misc	Entergy corrects description of pipelines in Indian Point license renewal application	ML101590515
2010-07-06	Correspondence / Meetings	NRC responds to 06/08/2010 email from Paul Blanch re: Texas pipeline incidents and applicability to Indian Point	ML101890929
2010-10-25	10 CFR 2.206	Paul Blanch submits 10 CFR 2.206 petition regarding pre-existing gas pipelines	ML103020293 (public) ML102990527 (non-public)

Date	Category	Activity	Reference
2010-11-02	10 CFR 2.206	NRC holds Petition Review Board meeting regarding 10/25/2010 10 CFR 2.206 petition from Paul Blanch	ML103081077
2010-11-05	10 CFR 2.206	Paul Blanch supplements 10 CFR 2.206 petition re: hazard frequency and 10 CFR 50.59 review on change to non-automatic valves	ML103260134 (public) ML103160377 (non-public)
2010-11-09	10 CFR 2.206	NRC holds Petition Review Board meeting regarding 10/25/2010 10 CFR 2.206 petition from Paul Blanch	ML103190125
2011-03-03	10 CFR 2.206	NRC holds Petition Review Board meeting regarding 10/25/2010 10 CFR 2.206 petition from Paul Blanch	ML110680090
2011-03-03	10 CFR 2.206	Paul Blanch supplements 10 CFR 2.206 petition re: 10 CFR 50.59 review on change to non-automatic valves and Part 100 siting requirements	ML110630131
2011-03-04	NRC Review / Analysis	NRC/Office of Nuclear Security and Incident Response completes safeguards review of Indian Point gas pipelines (referenced in staff memos)	NS108076 (non-public, safeguards) 3/7 memo: ML110700162 (non-public) 3/23 memo: ML11223A041 (public), ML110750113 (non-public)
2011-03-31	10 CFR 2.206	NRC rejects 10/25/2010 Paul Blanch petition, finding that issues had been previously resolved	ML110890309
2011-07-20	NRC Guidance	NRC issues draft Revision 2 to Regulatory Guide 1.91 (DG-1270) for public comment	ML110390554 76 FR 43356
2012-06-15	10 CFR 2.206	NRC staff responds to Atomic Safety and Licensing Board order re: 10 CFR 2.206 petitions	ML12167A524
2013-04-17	NRC Guidance	NRC issues Revision 2 to Regulatory Guide 1.91	ML12170A980
2013-12-23	NRC Guidance	NRC/NRR issues office instruction ADM-405, "NRR Technical Work Product Quality and Consistency," Revision 2	ML13337A212 (non-public)
2013-12-30	NRC Guidance	NRC/NRR issues office instruction COM-106, "Control of Task Interface Agreements," Revision 4	ML13300A002
2014-02-28	AIM / FERC	Algonquin Gas Transmission, LLC submits application to the Federal Energy Regulatory Commission (FERC) for Algonquin Incremental Market (AIM) project under CP14-96	https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14190856 https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14244199
2014-04-02	AIM / FERC	NRC and FERC meet to discuss whether to cooperate on FERC environmental impact statement for AIM pipeline	https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14209634

Date	Category	Activity	Reference
2014-04-30	AIM / FERC	Algonquin Gas Transmission, LLC submits info on Hudson River crossing, Indian Point location, and aerial view with measurements near Indian Point to FERC	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13532866 (see pp. 85 and 315)
2014-05-30	NRC Guidance	NRC/NRR issues office instruction LIC-504, "Integrated Risk-Informed Decision-Making Process for Emergent Issues," Revision 4	ML14035A143
2014-07-29	Licensee 50.59	Spectra sends information on AIM pipeline enhancements to Entergy (via Morgan Lewis) [Ref. 7 in 08/21/2014 10 CFR 50.59 evaluation]	obtained from Entergy through IP senior resident inspector
2014-08-06	AIM / FERC	FERC issues draft environmental impact statement for AIM pipeline	https://www.ferc.gov/industries/gas/enviro/eis/2014/08-06-14-eis.asp
2014-08-21	Licensee 50.59	Entergy submits 10 CFR 50.59 evaluation #1 for AIM pipeline	ML14245A110 (letter and Encl. 1) ML14245A111 (Encl. 2 non-public) ML15061A219 (Encl. 2 public)
2014-09-07	AIM / FERC	Paul Blanch submits comments on FERC draft environmental impact statement	ML18177A401 (Enclosure 3)
2014-09-30	AIM / FERC	NRC submits comments on FERC draft environmental impact statement, referencing planned 10 CFR 50.59 inspection	https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14255780
2014-10-15	10 CFR 2.206	Paul Blanch submits 10 CFR 2.206 petition re: Entergy 10 CFR 50.59 evaluation	ML14294A751
2014-10-16	Licensee 50.59	NRC/Office of New Reactors (NRO) documents "safety review and confirmatory analysis" re: Entergy's 08/21/2014 10 CFR 50.59 evaluation	ML14329A189 (non-public) ML15070A086 (public, redacted)
2014-10-17	AIM / FERC	NRC and FERC meet to discuss NRC 10 CFR 50.59 inspection	https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14276308
2014-10-30	Licensee 50.59	NRC Region I Division of Reactor Safety completes 10 CFR 50.59 inspection feeder to quarterly inspection report for Indian Point	ML14307B748
2014-11-03	AIM / FERC	Rick Kuprewicz provides report on AIM pipeline to Town of Cortlandt, questioning 3-minute assumption and asking for safety/risk assessment (submitted as supplement to 10/15/2014 petition)	ML14352A397
2014-11-07	Licensee 50.59	NRC issues integrated inspection report including 10 CFR 50.59 inspection results	ML14314A052
2014-11-11	Correspondence / Meetings	Paul Blanch responds to 11/06/2014 email from Dori Willis re: corrosion of gas lines	ML15008A117
2014-12-12	10 CFR 2.206	Entergy (Prussman) provides information to NRC (McCarver) re: basis for 3-minute valve closure time	ML15168A042

Date	Category	Activity	Reference
2014-12-30	AIM / FERC	Rick Kuprewicz writes to FERC re: need for transient analysis, risk assessment	enclosure in ML15027A419
2014-12-30	Correspondence / Meetings	NRC Chairman Macfarlane writes to Rep. Nita Lowey re: Entergy and NRC analyses	ML14343A934
2015-01-06	Correspondence / Meetings	Paul Blanch writes to Bill Dean (Region I Regional Administrator) re: 3-minute closure time and whether valves should be safety related	ML15008A119
2015-01-15	Correspondence / Meetings	Assemblywoman Sandy Galef writes to NRC Chairman Macfarlane re: independent risk analysis, Kuprewicz concerns	ML15027A419
2015-01-16	Licensee 50.59	Spectra sends Entergy updated (final) drawings for the tie-in between new and pre-existing pipelines	obtained from Entergy through IP senior resident inspector
2015-01-23	AIM / FERC	FERC issues final environmental impact statement for AIM pipeline	https://www.ferc.gov/industries/gas/enviro/eis/2015/01-23-15-eis.asp
2015-01-28	10 CFR 2.206	NRC holds public Petition Review Board meeting regarding 10/15/2014 10 CFR 2.206 petition from Paul Blanch	ML15044A459
2015-02-24	10 CFR 2.206	NRC holds internal Petition Review Board meeting to discuss initial decision to reject 10/15/2014 10 CFR 2.206 petition	(no reference)
2015-02-26	10 CFR 2.206	Paul Blanch writes to Doug Pickett (project manager) re: source for 3m closure time	ML15057A530
2015-03-03	AIM / FERC	FERC issues approval order for AIM pipeline	https://www.ferc.gov/CalendarFiles/20150303170720-CP14-96-000.pdf
2015-03-13	Correspondence / Meetings	NRC (Evans) responds to Assemblywoman Sandy Galef re: 60-minute analysis, Petition Review Board process	ML15050A131
2015-03-17	Correspondence / Meetings	Paul Blanch writes to Commissioners re: delay in 10 CFR 2.206 acknowledgement letter, deficiencies in NRC analysis	ML15082A419
2015-03-27	Correspondence / Meetings	Paul Blanch writes to NRC Chairman Burns re: testimony before Rep. Lowey	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13829121
2015-03-19	10 CFR 2.206	NRC/NRO documents sensitivity study regarding 3-minute isolation valve closure time on AIM pipeline	ML15078A067 Undated document; date estimated based on ADAMS addition.
2015-03-30	Licensee 50.59	NRC/NRR documents peer review of Entergy and NRC analyses re: 10 CFR 50.59	ML15331A342
2015-04-08	Licensee 50.59	Entergy submits 50.59 evaluation #2 for as-built AIM pipeline	ML15104A660 (letter and Encl. 1) ML15104A661 (Encl. 2 non-public)
2015-04-27	10 CFR 2.206	Dave Beaulieu emails Petition Review Board with background information on valve closure times (greater than 3m)	ML15274A108

Date	Category	Activity	Reference
2015-04-28	10 CFR 2.206	Doug Pickett (project manager) emails Paul Blanch re: Petition Review Board's initial recommendation to reject petition, offers opportunity for second presentation	ML15124A027
2015-04-30	Correspondence / Meetings	NRC, FERC, and U.S. Department of Transportation hold government-to-government meeting with Assemblywoman Sandy Galef re: pipeline	mentioned in ML15251A372 slides received from Region I
2015-05-20	Correspondence / Meetings	Entergy writes to NRC responding to questions raised at 04/30/2020 government-to-government meeting, including Spectra procedures, inline inspections, and idle status of 26-inch pipeline	ML15182A235
2015-05-20	Correspondence / Meetings	NRC holds annual assessment meeting for Indian Point	https://www.nrc.gov/pmns/mtg?do=details&Code=20150737 summary: ML15152A076 Paul Blanch statement: ML15159A609
2015-06-13	Licensee Review / Analysis	Allegation submitted re: pre-existing pipelines	ML15167A444
2015-06-24	Correspondence / Meetings	NRC Chairman Burns writes to Rep. Nita Lowey re: confidence in findings, "worst case" scenarios	ML15159A865 ML15176A589
2015-07-09	10 CFR 2.206	Paul Blanch supplements 10 CFR 2.206 petition re: failure probability of pre-existing gas lines	ML15195A081
2015-07-15	10 CFR 2.206	NRC holds second Petition Review Board meeting regarding 10/15/2014 10 CFR 2.206 petition from Paul Blanch	ML15216A047
2015-07-27	10 CFR 2.206	Paul Blanch writes to Doug Pickett (project manager) with 39 questions to be addressed by PRB	ML15251A050
2015-08-04	Correspondence / Meetings	Assemblywoman Sandy Galef writes to NRC Chairman Burns requesting independent risk assessment including transient risk analysis	ML15232A212
2015-08-27	Licensee Review / Analysis	NRC (Scott) issues Request for Information (RI-2015-A-0074) on gas pipelines	non-public (not in ADAMS)
2015-09-09	10 CFR 2.206	NRC (Miller) rejects 10/15/2014 Paul Blanch petition, finding that issues had been previously resolved	ML15251A023
2015-09-10	Correspondence / Meetings	Paul Blanch meets with NRC Chairman Burns and Commissioners Baran and Ostendorff (September 10-11)	ML15259A047

Date	Category	Activity	Reference
2015-09-25	Correspondence / Meetings	NRC (Satorius) writes to Assemblywoman Sandy Galef re: conservative assumptions, 04/30/2015 meeting	ML15251A372
2015-10-07	Correspondence / Meetings	NRC (McCree) responds to Timothy Judson of Nuclear Information and Resource Service re: Entergy and NRC analyses	ML15253A007
2015-10-12	Correspondence / Meetings	Rick Kuprewicz writes to Sandy Galef re: 09/25/2015 letter to her, need for transient analysis	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14016631
2015-10-15	Licensee Review / Analysis	Entergy responds to RI-2015-A-0074, enclosing 10/07/2015 analysis by Risk Research Group, as well as 2008 analysis listed above	non-public (not in ADAMS) - files on CD were not retained [additional safeguards material may exist]
2015-10-27	Correspondence / Meetings	Assemblywoman Sandy Galef writes to NRC (Satorius), attaching 10/12/2015 Rick Kuprewicz letter	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14039741
2015-11-06	10 CFR 2.206	NRC (Miller) responds to Paul Blanch's 39 questions re: 10/15/2014 10 CFR 2.206 petition	ML15287A257
2015-11-20	NRC Guidance	NRC/NRR issues OI COM-106, "Control of Task Interface Agreements," Revision 5	ML15219A174
2015-11-30	Correspondence / Meetings	NRC Chairman Burns writes to David Lochbaum re: Regulatory Guide 1.91 and Advisory Committee on Reactor Safeguards man-made hazards working group	ML15258A242
2015-12-07	Correspondence / Meetings	NRC Chairman Burns meets with elected officials near Indian Point	referenced in ML15348A324
2015-12-07	NRC Review / Analysis	NRC/NRO completes confirmatory analyses related to 30-inch pipeline at Indian Point as allegation follow-up	ML16235A166 (pp. 12-15, 47-50,53-56, 59-62 of PDF for various copies of analysis documentation) ML16215A115
2015-12-14	10 CFR 2.206	Paul Blanch responds to Chris Miller re: 11/6/2015 "39 questions" letter	ML15348A324
2015-12-17	AIM / FERC	Paul Blanch contacts Pipeline and Hazardous Materials Safety Administration (PHMSA) administrator re: 49 CFR 192	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14126329
2015-12-17	AIM / FERC	Paul Blanch contacts FERC Chairman re: 49 CFR 192	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14081851
2016-01-07	Correspondence / Meetings	NRC Chairman Burns writes to Rep. Nita Lowey re: differences of opinion, lack of need for additional risk assessment	ML15355A409
2016-01-21	AIM / FERC	FERC responds to Paul Blanch FOIA re: PHMSA risk analysis (no records)	enclosure in ML16064A007 (non-public)

Date	Category	Activity	Reference
2016-01-21	Correspondence / Meetings	NRC Chairman Burns responds to Assemblywoman Sandy Galef re: planned meeting with Rick Kuprewicz	ML16013A181
2016-01-26	AIM / FERC	Paul Blanch emails PHMSA administrator re: pipeline risk assessment (49 CFR 192)	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14126330
2016-02-02	Correspondence / Meetings	NRC and PHMSA meet with Rick Kuprewicz re: pipeline; NRC provides follow-ups with plant information, 2014 10 CFR 50.59 evaluation	meeting summary: ML16036A347 (non-public) 02/17/2016 follow-up email: ML16048A097
2016-02-18	AIM / FERC	PHMSA replies to Paul Blanch re: NY DPS inspections of pipeline, risk analysis	(no reference)
2016-02-18	Correspondence / Meetings	NRC (Krohn) responds to Assemblywoman Sandy Galef re: 12/28/2015 letter requesting NRC staff meeting with Rick Kuprewicz (held 02/02/2016)	ML16042A488
2016-02-25	OIG Inquiry	Paul Blanch writes to NRC Office of the Inspector General (OIG) to request investigation of NRC staff not fulfilling its regulatory responsibilities	provided by Paul Blanch to Dave Skeen 3/8/2020
2016-02-29	AIM / FERC	NY State informs FERC that the Governor directed an independent safety risk analysis of AIM pipeline near Indian Point	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14166823
2016-03-11	AIM / FERC	Paul Blanch writes to PHMSA administrator requesting risk analysis	(no reference)
2016-03-22	Correspondence / Meetings	NRC holds government-to-government meeting near Indian Point re: pipeline	slides received from Region I (date estimated)
2016-04-12	Correspondence / Meetings	Paul Blanch holds teleconference with PHMSA staff	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14209383
2016-06-08	Correspondence / Meetings	NRC holds annual assessment meeting for Indian Point	ML16176A116
2016-09-12	AIM / FERC	Rick Kuprewicz completes filing (filed 09/21/2016) re: AIM pipeline in FERC court case (DC Circuit Docket No. 16-1081)	https://www.delawareriverkeeper.org/sites/default/files/Safety%20Threats%20Ignored%20Attachment%203%2C%20Declaration%20of%20Richard%20Kuprewicz%2C%20T....pdf
2016-09-16	AIM / FERC	Paul Blanch completes filing (filed 09/21/2016) re: AIM pipeline in FERC court case (DC Circuit Docket No. 16-1081)	http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7B226348E4-8AA4-4E5F-B420-141915EE8C1F%7D
2016-10-18	AIM / FERC	Spectra requests FERC to authorize AIM to be placed in service using the pre-existing Hudson River crossings	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14379082

Date	Category	Activity	Reference
2016-11-30	Correspondence / Meetings	Paul Blanch emails Rao Tammara to request a meeting re: calculations	ML16336A729
2016-12-23	Correspondence / Meetings	NRC (Boland) responds to Paul Blanch request for meeting	ML16351A187
2018-02-08	NRC Guidance	NRC Commission holds public meeting on potential changes to the 10 CFR 2.206 petition review process	https://www.nrc.gov/reading-rm/doc-collections/commission/tr/2018/
2018-02-20	NRC Guidance	NRC issues Staff Requirements Memorandum re: Management Directive 8.11 updates (SRM-M180208)	ML18051A998
2018-06-22	AIM / FERC	NY State submits executive summary of risk analysis to FERC	ML18176A367 http://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7B72A21EDA-B822-46D0-8C1E-E873D7F570E8%7D
2018-06-25	AIM / FERC	Paul Blanch writes to FERC Chairman asking for risk assessment required by 49 CFR 192.917	ML18177A401
2018-07-27	AIM / FERC	DC Circuit Court of Appeals issues ruling in City of Boston v. FERC re: AIM pipeline	https://www.ferc.gov/legal/court-cases/opinions/2018/16-1081CITYOFBOSTON.pdf
2018-08-02	AIM / FERC	Enbridge writes to FERC re: New York State letter of 06/22/2018, pipeline safety	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14992932
2018-08-16	AIM / FERC	Paul Blanch writes to New York Governor re: Enbridge's statements	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=15000090
2019-03-01	NRC Guidance	NRC updates Management Directive 8.11 on 10 CFR 2.206 petition reviews	ML18296A043
2020-02-13	OIG Inquiry	NRC OIG issues Event Inquiry 16-024 on gas transmission lines near Indian Point	ML20056F095
2020-02-24	OIG Inquiry	NRC Chairman Svinicki tasks Executive Director for Operations (EDO) in response to OIG Event Inquiry 16-024	ML20057E265
2020-02-26	OIG Inquiry	EDO writes memo to Commission re: no need for immediate regulatory action	ML20058D088
2020-02-27	OIG Inquiry	EDO tasks David Skeen with leading expert evaluation team in response to OIG Event Inquiry 16-024	ML20058E354
2020-03-09	OIG Inquiry	NRC publicly releases evaluation team plan	ML20069A759
2020-03-09	OIG Inquiry	New York Department of Public Service writes to NRC and FERC re: NRC OIG report and 06/22/2018 letter	ML20071F306

Date	Category	Activity	Reference
2020-03-17	OIG Inquiry	Enbridge writes to FERC re: 03/09/2020 New York Senator Harkham letter, OIG report	https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=15486325
2020-03-19	OIG Inquiry	New York Attorney General's office writes to NRC, FERC, and PHMSA re: NRC OIG report	ML20090B533
2020-03-23	OIG Inquiry	Paul Blanch writes to NRC evaluation team leads	ML20086L164
2020-03-26	OIG Inquiry	New York State Public Service Commission writes to NRC evaluation team leads	ML20086L280

Appendix I. Notes

[1] Historical documents conflict on whether the pipeline under the Hudson is 24 inches or 26 inches in diameter. (It is 26 inches in diameter for the portion that crosses the site.) This report uses the 24-inch diameter based on the AIM application, Resource Report 10, Section 10.5.3 (https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13473930).

[2] In 2018, Spectra Energy was acquired by Enbridge Inc. Uses in this report of Algonquin, Spectra, and Enbridge are interchangeable. https://www.enbridge.com/media-center/news/details?id=123526&lang=en&year=2018

[3] Submitted February 28, 2014; publicly available initial submittal files accessible at https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14190856, with other documents retrievable via FERC's Docket Search for CP14-96.

[4] Submittal dated October 14, 2013, responding to a September 13, 2013, FERC request for scoping comments on a planned environmental impact statement for the AIM pipeline; https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13369875. This submittal is part of the pre-filing review docket PF13-16. Entergy's submittal notes that the potential for increased safety risks need to be evaluated before the pipeline begins operating. Entergy posed multiple questions regarding the construction and operations of the new pipeline.

[5] https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13473930

[6] Issued August 6, 2014; https://www.ferc.gov/industries/gas/enviro/eis/2014/08-06-14-eis.asp.

[7] Dated September 29, 2014; https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14255369.

[8] Dated September 30, 2014; https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14255780.

[9] Issued January 23, 2015; https://www.ferc.gov/industries/gas/enviro/eis/2015/01-23-15-eis.asp

[10] https://www.law.cornell.edu/cfr/text/49/part-192/subpart-O

[11] See pp. 4-276 to 4-279 of the final environmental impact statement.

[12] Issued March 3, 2015; https://www.ferc.gov/CalendarFiles/20150303170720-CP14-96-000.pdf.

[13] https://www.eia.gov/todayinenergy/detail.php?id=29032

[14] https://www.nrc.gov/reading-rm/doc-collections/cfr/part050/part050-0059.html

[15] Submitted August 21, 2014. The letter and 10 CFR 50.59 evaluation are publicly available at ADAMS Accession No. ML14245A110. Enclosure 2 to the letter (the Risk Research Group hazards analyses) is available to the NRC staff at ADAMS Accession No. ML12245A111. A redacted version of Enclosure 2 is publicly available at ADAMS Accession No. ML15061A219.

[16] This discussion of rupture isolation (sheets 7 to 8 of the 10 CFR 50.59 evaluation) is the first identification of the "three-minute assumption" discussed multiple times in this document. Specifically, the evaluation states (emphasis added) that: "[t]he existing pipeline automation and control system, which will be used for the proposed new 42 inch pipeline near [Indian Point], does not provide for an automatic isolation of the closest upstream and downstream mainline valves upon the detection of a pipeline rupture. The two closest actuated valves are located at mile post 2.61 on the west side of the Hudson River and at mile post 5.47 just east of [Indian

Point]. They would require an operator to take action to close these valves. The system, however, is monitored 24 hours a day and an alarm would immediately alert the control point operator, located in Houston, Texas, of an event and isolation would be initiated. This would result in all the gas between these valves at the time of closure being able to vent or burn. **The estimated time to respond to the alarm (less than one minute) and the closure time of the valves (about one minute) was used as the basis for an assumed closure time of three minutes for the analysis performed in the attached report** [Enclosure 2]" (emphasis added).

[17] This guidance did not exist at the time the applications were submitted for Indian Point; see note 181.

[18] In the 2015 Entergy submittal (note 19), these frequencies were updated to 1.25×10^{-5} per year per mile and 1.87×10^{-6} per year per mile for generic pipeline and enhanced pipeline, respectively.

[19] Submitted April 8, 2015. The letter and 10 CFR 50.59 evaluation are publicly available at ADAMS Accession No. ML15104A660. Enclosure 2 to the letter (the Risk Research Group hazards analyses) is available to the NRC staff at ADAMS Accession No. ML15104A661.

[20] Submitted September 19, 2016, for Unit 2; ADAMS Accession No. ML16280A161. (Chapter 2 is publicly available at ADAMS Accession No. ML16280A162, and the Chapter 2 figures are publicly available at ADAMS Accession No. ML16280A163.) Submitted October 2, 2017, for Unit 3; ADAMS Accession No. ML17299A163. (Chapter 2 is publicly available at ADAMS Accession No. ML17299A180, and the Chapter 2 figures are publicly available at ADAMS Accession No. ML17299A183.)

[21] Current version issued November 26, 2019; ADAMS Accession No. ML19197A103. The version that was in effect at the time of the Indian Point inspection (issued December 21, 2010) is publicly available at ADAMS Accession No. ML101320542.

[22] Issued November 7, 2014; ADAMS Accession No. ML14314A052

[23] The documentation of the NRC confirmatory analysis dated October 15, 2014, is available to the NRC staff at ADAMS Accession No. ML14329A189. A redacted version is publicly available at ADAMS Accession No. ML15070A086. The regional inspection report "feeder" dated October 30, 2014, is publicly available at ADAMS Accession No. ML14307B748.

[24] Held April 2 and April 23, 2014; https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14209634.

[25] Submitted September 30, 2014; https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14255780.

[26] https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14276308

[27] Issued February 13, 2020; ADAMS Accession No. ML20056F095

[28] ADAMS Accession No. ML20057E265

[29] ADAMS Accession No. ML20058D088

[30] ADAMS Accession No. ML20058E354

[31] ADAMS Accession No. ML20069A759

[32] ADAMS Accession No. ML20078L380

[33] Transcripts available at ADAMS Accession Nos. ML20087M164 and ML20087M178.

[34] Revision 2 issued April 2013; ADAMS Accession No. ML12170A980.

[35] Spectra (now Enbridge) informed Entergy that the pipe would have 0.72-inch wall thickness and be X-70 piping with 70,000 psi yield strength and 82,000 psig minimum tensile strength. The pipe would be procured from vendors who have passed a stringent quality audit, and full-time mill inspection would be performed by Algonquin Gas Transmission during pipe production. Specifications would require additional quality testing and integrity requirements beyond normal standards. These enhancements were discussed in a Spectra Energy (Algonquin Gas Transmission) memorandum to Energy regarding Response to Entergy Document entitled "Pipeline Enhancements Being Evaluated to Mitigate a Pipeline Failure," dated July 29, 2014.

[36] Defined in 49 CFR 192.103; https://www.law.cornell.edu/cfr/text/49/192.903.

[37] Spectra Energy, "Integrity Management Program (IMP) Manual," 09-0000, Revision 11, dated October 10, 2019. This manual is not publicly available, but Enbridge made it available to the team.

[38] "Managing System Integrity of Gas Pipelines," published in 2018. Publicly available from https://www.asme.org/codes-standards/find-codes-standards/b31-8s-managing-system-integrity-gas-pipelines. The team had access to this standard through the NRC's subscription service.

[39] Specified minimum yield strength is defined in 49 CFR 192.3, "Definitions," https://www.law.cornell.edu/cfr/text/49/192.3. For the AIM pipeline near Indian Point, Enbridge specified that the piping would have a 70,000 psi yield strength.

[40] https://www.law.cornell.edu/cfr/text/49/part-192/subpart-J

[41] "Algonquin Incremental Market Pipeline Risk Analysis Report," transmitted from several New York State agencies to the FERC Chairman on June 22, 2018 (see note 129 for a related letter). The report is marked privileged and confidential and may contain Critical Energy Infrastructure Information, as designated by the FERC. It is not available to the public.

[42] See notes 15 and 19.

[43] See note 22.

[44] "Studies for the Requirements of Automatic and Remotely Controlled Shutoff Valves on Hazardous Liquids and Natural Gas Pipelines with Respect to Public and Environmental Safety," ORNL/TM-2012/411, dated October 31, 2012; https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/technical-resources/pipeline/16701/finalvalvestudy.pdf

[45] Regulatory Guide 1.91 does not include any guidance on calculating heat fluxes associated with blasts. The guide assumes that overpressurization is the limiting scenario.

[46] 68 FR 69778, issued December 15, 2003; https://www.govinfo.gov/link/fr/68/69817. Additional information on this rule can be found in the docket folder at https://www.regulations.gov/docket?D=PHMSA-RSPA-2000-7666.

[47] Dated October 2000; https://www.regulations.gov/document?D=PHMSA-RSPA-2000-7666-0049.

[48] See note 44

[49] See note 41

[50] See Note 19

[51] Published September 1983; ADAMS Accession No. ML062260290.

[52] Response to a Request for Additional Information regarding Order EA-12-049 and Order EA-12-051, dated December 2, 2016; ADAMS Accession No. ML16350A103.

[53] Indian Point Unit 3 Individual Plant Examination, dated June 1994; ADAMS Accession No. ML110320477

[54] Letter from J. Knubel, NY Power Authority to NRC on Indian Point, Unit 3, Transmittal of Individual Plant Examination of External Events (IPEEE); ADAMS Accession No. ML11227A102

[55] See note 47

[56] IMC-0609 issued January 2019; ADAMS Accession No. ML18187A187

[57] Revision 3 issued January 2018; ADAMS Accession No. ML17317A256

[58] UFSAR Section 16.2; ADAMS Accession No. ML17299A229

[59] From PHMSA Gas Distribution Incident Data - January 2010 to present (ZIP); https://www.phmsa.dot.gov/data-and-statistics/pipeline/distribution-transmission-gathering-lng-and-liquid-accident-and-incident-data

[60] 77 FR 41454, issued July 13, 2012; https://www.govinfo.gov/content/pkg/FR-2012-07-13/pdf/2012-17110.pdf

[61] FSAR for HI-STORM 100; ADAMS Accession No. ML081350153

[62] https://www.nrc.gov/reading-rm/doc-collections/cfr/part050/part050-0009.html

[63] https://www.nrc.gov/reading-rm/doc-collections/cfr/part050/part050-0005.html

[64] 10 CFR 2.206 Petition Review Board, RE: Indian Point Nuclear Generating Unit, Docket No. 50-247, Transcript, (July 15, 205), p. 14, 16.

[65] The petitioner raised this issue during his interview with the team, as well in multiple instances of correspondence with the NRC.

[66] *See* Enforcement Manual, Part II-1: General Topics, Section 1.5.

[67] Submitted October 15, 2014; ADAMS Accession No. ML14294A751.

[68] Concerns with issues related to the petition that were handled in other NRC processes are addressed in Section 5. This section focuses on the 10 CFR 2.206 petition process.

[69] A transcript of the January 28, 2015, meeting is available ADAMS Accession No. ML15044A459.

[70] A transcript of the July 15, 2015, meeting is available at ADAMS Accession No. ML15216A047.

[71] Submitted July 27, 2015; ADAMS Accession No. ML15251A050.

[72] Petition rejection issued September 9, 2015; ADAMS Accession No. ML15251A023. Response to 39 questions issued November 6, 2015; ADAMS Accession No. ML15287A257.

[73] Enforcement Petition Process brochure dated March 2019; ADAMS Accession No. ML19070A037.

[74] Based on the team's review, the newly modified process would have been unlikely to result in material change in the outcomes. As a result, the team focused on how the current process could be improved to address the concerns identified by OIG Event Inquiry (see note 27).

[75] Management Directive 8.11, "Review Process for 10 CFR 2.206 Petitions," issued March 1, 2019; ADAMS Accession No. ML18296A043.

[76] "Desktop Guide: Review Process for 10 CFR 2.206 Petitions," effective March 1, 2019; ADAMS Accession No. ML18176A147

[77] Unsupported assertions, general opposition to nuclear power, the identification of safety issues without seeking enforcement action fall outside the 10 CFR 2.206 petition process. Other processes that could be triggered include allegation reviews or investigations by the NRC Office of Investigations or OIG.

[78] The office coordinator is selected from the NRC office responsible for regulating the licensee (e.g., NRR for an operating reactor).

[79] The PRB may include a representative from the Office of Investigations and a cognizant office enforcement coordinator.

[80] Desktop Guide, Appendix B, Section III.C.

[81] Desktop Guide, Appendix B, Section III.C – III.D.

[82] Desktop Guide, Appendix B, Section III.D.1.a.

[83] "Significant" information means that the information is sufficiently great or important to be worthy of attention and that the information is real and not speculative. The information must also be "new" in that the NRC staff has not previously received and/or evaluated the information in response to the issue raised in the petition (which includes any prior resolutions of the issue). The term "significant new information" means that the information is both significant and new. Desktop Guide, Appendix B, Section III.D.1.b. n. 1.

[84] The PRB chairperson informs the office director or designee of its initial assessment.

[85] Some limited exceptions to the public meeting requirement may apply. See Management Directive 3.5, "Attendance at NRC Staff-Sponsored Meetings," issued December 4, 2019; ADAMS Accession No. ML19350A643.

[86] Desktop Guide, Appendix B, Section III.H.3.

[87] A Director's Decision is the official agency response to a 2.206 petition that is accepted for review. The Director's Decision may grant, partially grant, or deny the action requested by the petitioner. In most cases, the staff prepares a proposed Director's Decision, which is transmitted to the petitioner and licensee for comment. After receiving any comments, the staff dispositions the comments and revises the Director's Decision as appropriate. The director's decision is then issued and a notice of issuance is subsequently published in the Federal Register. Desktop Guide, Appendix B, Section V.

[88] Desktop Guide, App. B, p.2. The Commission will not entertain a request for review of the office director's decision. *Id.*

[89] See note 67. 10 CFR 2.206 Petition Review Board, RE: Indian Point Nuclear Generating Unit, Docket No. 50-247, Transcript, (July 15, 205), p. 14, 16.

[90] 10 CFR 2.206 Petition Review Board, RE: Indian Point Nuclear Generating Unit, Docket No. 50-247, Transcript, (July 15, 205), p. 23. For a comparison of the ALOHA calculations with the analysis performed by Sandia as part of this team's activities, refer to Section 2 and Appendix C.

[91] See note 72.

[92] A security-related summary of this analysis is available to the NRC staff at ADAMS Accession No. ML15078A067. Images of portions of the analysis are included in this report as Figure 9 and Figure 10.

[93] Information provided by the petitioner on these meetings is available to the NRC staff at ADAMS Accession No. ML15259A047.

[94] Volume 8, Licensee Oversight Programs Review Process for 10 CFR 2.206 Petitions Handbook 8.11 Part II, p. 9. Similar criteria for rejecting a petition continue to appear in the current guidance for evaluating 10 CFR 2.206 petitions.

[95] Issued March 18, 2020; available to the NRC staff at ADAMS Accession No. ML20066J085.

[96] Training slides are available to the NRC staff at ADAMS Accession No. ML20070M965.

[97] NRR-COM-106, issued November 20, 2015; ADAMS Accession No. ML15219A174.

[98] In the case of the 10 CFR 50.59 inspection for Indian Point, the inspector recalled the analyst taking a couple of months to respond. This level of effort probably warranted a Task Interface Agreement.

[99] Desktop Guide on 2.206, Appendix B, p. 8.

[100] The petition manager "[b]riefs the petition review board on the petitioner's request(s), any background information, the need for an independent technical review, and a proposed plan for resolution, including target completion dates." Volume 8, Licensee Oversight Programs Review Process for 10 CFR 2.206 Petitions Handbook 8.11 Part I, p. 4.

[101] Filing dated June 15, 2012; ADAMS Accession No. ML12167A524.

[102] Copies of the ALOHA runs and hand calculations were returned to the technical reviewer during the team's review.

[103] Staff Responses to Public Comments on Regulatory Guide 1.91, Revision 2, issued April 26, 2013; ADAMS Accession No. ML12170A987.

[104] See note 26.

[105] Given the short timeframe for the team's activities, the team decided not to review any NRC staff who were involved with these issues but had subsequently retired. OIG interviewed some of these individuals, including the licensing project manager referenced as "NRC's primary communicator with FERC."

[106] The team observes that the AIM pipeline does *not* cross Indian Point property. See Figure 4 for an overview of the AIM pipeline in yellow.

[107] Management Directive 5.1, issued April 5, 1993; ADAMS Accession No. ML041770442.

[108] 10 CFR 51.29(a)(7); https://www.nrc.gov/reading-rm/doc-collections/cfr/part051/part051-0029.html.

[109] 73 FR 55546, published September 25, 2008; https://www.federalregister.gov/documents/2008/09/25/E8-22528/notice-of-availability-of-memorandum-of-understanding-between-us-army-corps-of-engineers-and-us

[110] Effective in April 2018; https://www.whitehouse.gov/wp-content/uploads/2018/04/MOU-One-Federal-Decision-m-18-13-Part-2-1.pdf. The NRC is not a party to this memorandum of understanding but is addressing certain aspects of the referenced Executive Order in its environmental review practices, as appropriate.

[111] See note 19.

[112] See note 23.

[113] See note 15.

[114] See note 92.

[115] Zalosh, R.G., SFPE Handbook of Fire Protection Engineering, 2nd Edition, "Explosion Protection," Society of Fire Protection Engineers (SFPE), Boston, MA, June 1995.

[116] See note 12.

[117] See note 26.

[118] The meeting summary conclusion is: "Based on its review, the NRC came to the same conclusion that Entergy did in its 50.59 submission. Therefore, NRC finds Entergy's 50.59 submission acceptable and has determined that no prior approval from the NRC is needed."

[119] The November 2014 NRC inspection report concludes that "**Entergy's conclusions** involving the potential rupture of the proposed pipeline near [Indian Point] poses **no threat to safe operation of the plant or safe shutdown of the plant**, are reasonable and acceptable, and are also comparable with the staff's conclusions" (emphasis added). Other NRC documents, including the response to the petitioner's 39 questions in November 2015 (see note 72), did include looser uses of "safe operation."

[120] 10 CFR 50.2: "*Safety-related structures, systems and components* means those structures, systems and components that are relied upon to remain functional during and following design basis events to assure: (1) The integrity of the reactor coolant pressure boundary[;] (2) The capability to shut down the reactor and maintain it in a safe shutdown condition; or (3) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the applicable guideline exposures set forth in § 50.34(a)(1) or § 100.11 of this chapter, as applicable." https://www.nrc.gov/reading-rm/doc-collections/cfr/part050/part050-0002.html

[121] The reference to "important to safety" SSCs in Regulatory Guide 1.91 complicates matters somewhat. The guide's intent is not clear for this reference. The NRC does not define important to safety in its requirements, other than in the general statement in the introduction to 10 CFR Part 50, Appendix A, "General Design Criteria": "structures, systems, and components that provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public."[121] There has been significant discussion of this definition and how it differs from (is broader than) the definition of "safety-related" over the decades since this regulation was issued (after the construction permits were issued for Indian Point Units 2 and 3). Licensees have taken individual approaches to defining important-to-safety SSCs for their facilities. In its 2015 final 10 CFR 50.59 evaluation, Entergy listed "important to safety" equipment or structures that could

be affected by pipeline ruptures: the switchyard, diesel fuel tank, meteorological tower, and emergency operations facility. The team did not question Entergy's classification of these as "important to safety," but the team did not follow up on whether Entergy treats all of these as such (e.g., analyzing them against dynamic effects under General Design Criterion 4) or is required to depending on the Indian Point licensing basis. The team agrees, however, with Entergy's conclusion that loss of these, while not ideal, is either analyzed (in the case of the switchyard, which would cause a loss of offsite power) or could be mitigated by backups (the diesel fuel tank has a tanker truck backup, and the meteorological tower and emergency operations facility that both have backup facilities). These SSCs could be analyzed for missile impacts, but since they were already considered lost because of overpressure or heat flux, that does not seem necessary.

[122] For example, tornadoes at Indian Point Unit 2 were not evaluated in detail at initial licensing, but were considered in the hearings discussed in Section A.4 of Appendix A to this report. The Commission determined that only a wind evaluation of certain equipment and structures was needed.

[123] ADAMS Accession No. ML20086L280.

[124] ADAMS Accession No. ML20086L164

[125] Not yet publicly available at the time this report was finished; available to the NRC staff at ADAMS Accession No. ML20090B533.

[126] Not yet publicly available at the time this report was finished; available to the NRC staff at ADAMS Accession No. ML20084M363.

[127] Not yet publicly available at the time this report was finished; available to the NRC staff at ADAMS Accession No. ML20087M278.

[128] Not yet publicly available at the time this report was finished; available to the NRC staff at ADAMS Accession No. ML20071F306.

[129] Dated June 22, 2018; ADAMS Accession No. ML18176A367.

[130] Dated November 30, 2015; ADAMS Accession No. ML15258A242.

[131] The "amended and substituted application" submitted on December 5, 1960, is the likely source of this map. It is available to the NRC staff at ADAMS Accession No. ML110690359. Exhibit H-13 is separately available at ADAMS Accession No. ML093220861.

[132] Available to the NRC staff at ADAMS Accession No. ML110590360.

[133] Issued February 21, 1962; available to the NRC staff at ADAMS Accession No. ML111510462.

[134] DPR-5 issued on March 26, 1962; available to the NRC staff at ADAMS Accession No. ML100330629.

[135] By 1965, this paragraph had been revised to include "as amended" at the end. (ADAMS Accession No. ML110480269 shows the updated paragraph.) Later, the proposed technical specifications for the full-term operating license were even more explicit: "The transmission and distribution of natural gas shall be through the use of facilities located as described in U.S. Atomic Energy Commission Docket No. 50-3, Exhibit H-14." (ADAMS Accession No. ML100601013)

[136] Additional context for this paragraph can be found in the transcript of the Commission hearing (hearing held January 3, 1962; available to the NRC staff at ADAMS Accession No. ML100082152).

Dr. Bryan of the AEC Division of Licensing and Regulation was asked about changes the applicant made regarding activities on the site. He stated that "[i]n the application, the only description of activities connected with the use of handling of natural gas had to do with the transmission of natural gas through a line which traverses the site. We have not had any, we have not had presented to us any evaluation of the hazards that might be involved in utilization, in any further utilization of such facilities than that described in the application." The focus of the discussion appears to be on the potential hazards of "distribution and utilization" of natural gas onsite (e.g., if the licensee wanted to use the natural gas to supply a power plant onsite), not the transmission pipeline itself that the AEC staff was aware of and on which it was making its findings.

Also, the AEC staff sent a brief on, that provided input for the licensing order (dated February 5, 1962; available to the NRC staff at ADAMS Accession No. ML111510466). In this brief, the staff noted that it had proposed an amendment to technical specifications Section A.3 "in order to assure that any expansion of such activities [related to natural gas], not presently in the application will be subject to Commission review under the change procedure set forth" in the license. This change procedure was similar to 10 CFR 50.59, "Changes, tests, and experiments," which did not become effective until July 1962 (27 FR 5491). It enabled the licensee to make certain changes to the Hazards Summary Report (analogous to the FSAR) if they did not involve an unreviewed safety question—i.e., if the probability of occurrence of an analyzed accident did not increase, if the consequences of an analyzed accident did not increase, and if the change did not create a credible probability of a different type of nuclear accident than those analyzed. If the change would affect the technical specifications (Appendix A of the license) then AEC approval would be needed.

[137] Later changed to a minimum of 1400 feet "from the reactor facility to the nearest land boundary of the exclusion area." ADAMS Accession No. ML0112500379.

[138] Dated October 23, 1964; available to the NRC staff at ADAMS Accession No. ML110590225.

[139] Available to the NRC staff at ADAMS Accession No. ML110490188.

[140] Dated November 10, 1969; available to the NRC staff at ADAMS Accession No. ML100080840.

[141] The General Design Criteria now appear as Appendix A to 10 CFR Part 50 and are part of the application requirements for reactor licenses. At the time, they existed as a proposed rule (32 FR 10213).

[142] Available to the NRC staff at ADAMS Accession No. ML111370488.

[143] A 1979 petition from the Union of Concerned Scientists resulted in NRC action that effectively (if not formally) revoked the Unit 1 operating license. Section 1.1.3 has more information on this petition.

[144] Submitted December 16, 1965; ADAMS Accession No. ML093520917 (transmittal letter; PSAR chapters are in separate documents).

[145] ADAMS Accession No. ML102460284

[146] ADAMS Accession No. ML073240146. The second page of this document notes that it reflects the October 1968 submittal through Supplement 15 in November 1970, with certain sensitive information redacted.

[147] ADAMS Accession No. ML072260449

[148] Submitted April 26, 1967; ADAMS Accession No. ML100250264 (transmittal letter; PSAR chapters are in separate documents)

[149] ADAMS Accession No. ML093480188

[150] Submitted August 30, 1968; ADAMS Accession No. ML093480204. The evaluation begins on p.253 of the file: Item 7 of Supplement 1 to the Indian Point Unit 3 PSAR. The PSAR is part of the application to the AEC for a construction permit.

[151] ADAMS Accession No. ML100261033

[152] This quotation is from Amendment 13 to the FSAR submitted December 4, 1970, available to the NRC staff at ADAMS Accession No. ML093480359.

[153] ADAMS Accession No. ML072260465

[154] ADAMS Accession No. ML031080517

[155] The FSAR was submitted on July 22, 1982. It is not publicly available but is available electronically to NRC staff; Chapter 2 is ADAMS Accession No. ML100350907.

[156] The FSAR was submitted in July 20, 1984. It is not publicly available but is available electronically to NRC staff; Chapter 2 is ADAMS Accession No. ADAMS Accession No. ML100431991

[157] The October 20, 2008, transmittal letter is publicly available at ADAMS Accession No. ML083390108. The FSAR is not publicly available but is available electronically to NRC staff. (Chapter 2 is ADAMS Accession No. ML083390226 and the Chapter 2 figures are ADAMS Accession No. ML083390227.)

[158] The October 6, 2010, transmittal letter is publicly available at ADAMS Accession No. ML11280A140. The FSAR is not publicly available but is available electronically to NRC staff. (Chapter 2 is ADAMS Accession No. ML11280A135 and the Chapter 2 figures are ADAMS Accession No. ML11280A136.)

[159] The July 14, 1982, transmittal letter is publicly available at ADAMS Accession No. ML093380878. The FSAR is not publicly available but is available electronically to NRC staff. (Chapter 2 is ADAMS Accession No. ML20055A765.)

[160] The October 13, 2009, transmittal letter is publicly available at ADAMS Accession No. ML093430690. The FSAR is not publicly available but is available electronically to NRC staff. (Chapter 2 is ADAMS Accession No. ML093430729 and the Chapter 2 figures are ADAMS Accession No. ML093430731.)

[161] FSAR Reference 1: IP-[RPT]-08-00032, "Consequences of Fire and Explosion Following the Release of Natural Gas from Pipelines Adjacent to Indian Point", by David Allen, Risk Research Group, August 2008.

[162] The FSAR was submitted on October 1, 2015. It is not publicly available but is available electronically to NRC staff. (Chapter 2 is ADAMS Accession No. ML15293A108 and the Chapter 2 figures are ADAMS Accession No. ML15293A109.)

[163] Issued February 11, 1980; available to the NRC staff (without enclosures) at ADAMS Accession No. ML100290756.

[164] Issued May 30, 1980; available to the NRC staff at ADAMS Accession No. ML100150748.

[165] The task force issued its results as NUREG-0715, "Task Force Report on Interim Operation of Indian Point," in August 1980 (available to the NRC staff at ADAMS Accession No. ML19344F216), concluding that was the overall risk of the Indian Point reactors was about the same as the typical reactor on a typical site. The task force report does not mention the natural gas pipelines. This report supported a Commission decision that the units could continue to operate during the adjudicatory proceeding, but the Commission noted that it would not "turn a decision on interim operation into a final decision on the long-term acceptability [of] the Indian Point site."

[166] Dated January 8, 1981, and September 18, 1981; available to the NRC staff at ADAMS Accession Nos. ML19340E920 and ML20039A702, respectively.

[167] Available to the NRC staff at ADAMS Accession No. ML20081A330.

[168] CLI-85-06, issued May 7, 1985; legacy ADAMS Accession No. 8505090592 (not available electronically to the NRC staff)

[169] ADAMS Accession No. ML003778131

[170] Submitted March 5, 1982; ADAMS package Accession No. ML093430890

[171] ADAMS Accession No. ML102520202 (part of package referenced in Note 170)

[172] United Engineers and Constructors was the principal subcontractor to Westinghouse as the architect-engineer of Indian Point.

[173] Submitted August 25, 1982; available to the NRC staff at ADAMS Accession No. ML100200464. (This version is marked as a draft.)

[174] NUREG/CR-2934, "Review and Evaluation of the Indian Point Probabilistic Safety Study," dated December 1982. ADAMS Accession No. ML091540534.

[175] Dr. Budnitz was an expert in the area of probabilistic risk assessment. He had served for two years as the director of the NRC Office of Nuclear Regulatory Research. Among other activities as an independent consultant, he was part of an independent advisory body to the NRC that reviewed the pioneering WASH-1400 Reactor Safety Study to describe how risk assessment methodology could be used in the NRC review process.

[176] Written testimony submitted January 24, 1983; available to the NRC staff at ADAMS Accession Nos. ML20070N197. Hearing held February 10, 1983; transcript available to the NRC staff at ADAMS Accession No. ML20064N013.

[177] During the hearing, Dr. Budnitz was asked if he was aware that there was a 13.8 kilovolt underground cable from the Buchanan substation to the plant that was extrinsic to those power sources; he said he was not. Presumably this line was perceived by the Board as a backup to the overhead transmission lines.

[178] ADAMS Accession No. ML051400209

[179] ADAMS Accession No. ML093430606

[180] Only an internal input to the safety evaluation was readily available to the team (ADAMS Accession No. ML093450337). The transmittal file for the final safety evaluation (available to the NRC staff at ADAMS Accession No. ML093430874) did not include an enclosure.

[181] For example, the following guidance documents issued after the initial licensing of the Indian Point units address natural gas pipelines in various ways. Regulatory Guide 1.70 on format and

content for safety analysis reports (reactor license applications) was not issued until 1972 (ADAMS Accession No. ML13350A353). This document standardized the format of applications submitted after that time. Section 2.2.3 of Regulatory Guide 1.70, Revision 0, states "[i]f large natural gas pipelines cross, or pass close to the nuclear plant, explosions from this source should be evaluated." The NRC staff's review of later applications was conducted under the Standard Review Plan, issued for the first time in 1975 (ADAMS Accession No. ML081510817). Sections 2.2.1 and 2.2.2 of the Standard Review Plan noted that "[t]he problems of pipeline rupture and other flammable gas releases are reviewed on an individual case basis by evaluating analyses provided by the applicant, and may also involve independently checking the gas cloud size and TNT equivalency derived by the applicant." The AEC provided related guidance to applicants and licensees in Regulatory Guide 1.91, "Evaluation of Explosions Postulated To Occur on Transportation Routes Near Nuclear Power Plant Sites," issued in January 1975 (ADAMS Accession No. ML12298A133). The introduction of the 1975 edition was clear that it was focused on materials carried over transportation routes "not including gases." The NRC revised the guidance in February 1978 (ADAMS Accession No. ML003840286) to be even more clear about its scope: "This guide is limited to solid explosives and hydrocarbons liquified under pressure and is not applicable to cryogenically liquified hydrocarbons, e.g., LNG. It considers the effects of airblasts on highway, rail, and water routes but excludes pipelines and fixed facilities." This Revision 1 does not reference gases at all. Not until 2011 did the NRC issue draft guidance (DG-1270) that addressed pipeline explosions specifically (ADAMS Accession No. ML110390554). This guidance was finalized in 2013 as Revision 2 to Regulatory Guide 1.91 (ADAMS Accession No. ML12170A980).

182 Generic Letter 88-20, Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities - 10CFR 50.54(f)," dated June 28, 1991. https://www.nrc.gov/reading-rm/doc-collections/gen-comm/gen-letters/1988/gl88020s4.html

183 SECY-90-343, "Status of the Staff Program to Determine How the Lessons Learned from the Systematic Evaluation Program Have Been Factored into the Licensing Bases of Operating Plants," dated October 4, 1990. Available to the NRC staff at ADAMS Accession No. ML19324H923.

184 Submitted December 6, 1995; ADAMS Accession No. ML11227A100.

185 The team reviewed 10 CFR 50.59 annual reports from 1980 through 1997 for Indian Point Units 2 and 3 and could not find a disposition of this change with respect to docketed correspondence for Units 1 and 3 (see notes 140 and 150).

186 Memo dated May 14, 1999; ADAMS Accession No. ML090130608.

187 Submitted September 26, 1997; ADAMS Accession No. ML11227A102.

188 Memo dated December 15, 2000; available to the NRC staff at ADAMS package Accession No. ML003780825.

189 Letters dated April 23, 2008, and September 30, 2008, are not in ADAMS but were made available to the team. The September letter included a security-related enclosure dated August 14, 2008, that is available to the NRC staff at ADAMS Accession No. ML103140627. This is the same analysis that was referenced in the 2009 revision to the Indian Point Unit 3 FSAR (see Section 1.1.2.2 of this report).

[190] Letter dated October 15, 2015, is not in ADAMS but was made available to the team. The referenced "2015 Report" was not available to the team but was discussed in detail in the attachment to the letter.

[191] For example, Entergy states that the metal siding on the Unit 3 fuel storage building could be damaged by the heat flux, but the building has been evaluated for the effects of siding damage and fires, and the reinforced concrete spent fuel pool would not be affected.

[192] Memo dated April 25, 2003; ADAMS Accession No. ML11223A040. The non-public enclosure is available to the NRC staff at ADAMS Accession No. ML031210213.

[193] See Note 51.

[194] Submitted October 25, 2010; ADAMS Accession No. ML103020293. The non-public version is available to the NRC staff at ADAMS Accession No. ML102990527.

[195] An internal memo dated March 23, 2011, referencing these reviews is publicly available at ADAMS Accession No. ML11223A041. Detailed information is available to the NRC staff at ADAMS Accession Nos. ML110750113 (March 23, 2011, memo) and ML110700162 (March 7, 2011, input memo), as well as in a safeguards report that the team reviewed.

[196] Letter dated March 31, 2011; ADAMS Accession No. ML110890309

[197] UFSAR Section 16.2; ADAMS Accession No. ML17299A229

[198] From PHMSA Gas Distribution Incident Data - January 2010 to present (ZIP); https://www.phmsa.dot.gov/data-and-statistics/pipeline/distribution-transmission-gathering-lng-and-liquid-accident-and-incident-data

[199] "Potential impact radius" is defined in DOT regulations at 49 CFR 192.903 as the radius of a circle within which the potential failure of a pipeline could have significant impact on people or property. PIR is determined by the formula r = 0.69* (square root of (p*d 2)), where "r" is the radius of a circular area in feet surrounding the point of failure, "p" is the maximum allowable operating pressure (MAOP) in the pipeline segment in pounds per square inch and "d" is the nominal diameter of the pipeline in inches. The 0.69 constant is the applicable value for natural gas.

1. Conclusions Regarding Safety Analysis

Throughout its work, the team remained focused on the safety of Indian Point and whether new information revealed the need to take immediate regulatory action. The team did not identify any concerns that met this threshold. This section of the report describes how the team considered the safety of Indian Point in proximity to the AIM pipeline, from three perspectives: the likelihood of a pipe rupture and blowdown that could affect Indian Point, the consequences of a pipeline explosion (overpressurization and missiles), and the consequences of a pipeline-rupture-related fire (heat impacts). The team considered historical experience and conducted its own analyses of dynamic gas behavior following a pipe rupture and the risk of subsequent impacts at Indian Point. The subsections below address these topics in detail.

1.1. Pipe Rupture and Blowdown Likelihood

1.1.1. Design and Construction Enhancements

The team obtained information from Enbridge (the AIM pipeline operator) regarding the enhanced design and construction of the AIM pipeline near Indian Point. Similar information had been provided to Entergy, in support of its 10 CFR 50.59 evaluation, and other requesting parties. The measures taken by Enbridge exceed or meet the applicable Department of Transportation requirements under 49 CFR Part 192, "Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards." For example, the enhanced protections for the pipeline adjacent to Indian Point include:

Commented [HB1]: I would leave out generally here. "Generally" implies that they don't

- A more stringent design factor, higher-grade pipe[1], and deeper burial than required
- Fusion-bonded epoxy coatings for corrosion control inside and outside the pipe, an abrasive resistant overlay outside the pipe, and no shrink sleeves or tape coatings on field weld joints
- 100-percent non-destructive examination of all girth welds; 100-percent inspection of all welding, coating, and backfilling activities; and "pigging" after construction to identify any dents exceeding code limitations

Commented [HB2]: Consider: I know what pig traps are and pigging. Members of the public may not be so familiar with the term. Should we define?

Enbridge also placed fiber-reinforced concrete slabs and warning tape above the pipeline near Indian Point to reduce the likelihood of construction digging or other activities inadvertently reaching and damaging the pipeline.

In general, these enhancements reduce the likelihood of a pipeline rupture due to known risk factors such as welding flaws, corrosion, and incidental damage. The team's peer reviewer (see Appendix E) confirmed this reduction when reviewing the team's event frequency estimate discussed in Section 2.5 below:

> The method used to establish the initiating event frequency, although based on actual data, does not have a high degree of statistical confidence or relevance to the AIM pipeline. The data are a limited sample, and there were likely different causes and conditions associated with each of the fifteen rupture events (seam weld manufacturing defects/low toughness, external corrosion, stress corrosion cracking, and third-party damage are the more common ones). And these conditions are not directly applicable to the subject AIM pipeline. Most, if not all, of these failures were likely in legacy pipelines, manufactured to less rigorous standards than current practice and have been subjected to many years of potential in-service degradation. This is especially true for the ~4000 ft of enhanced AIM pipeline in

closest proximity to [Indian Point]. Therefore, although there is a high degree [of] uncertainty in the assumed initiating event frequency, **it is likely that the uncertainty is in the direction of making this estimate much higher than the true rupture frequency of that pipeline segment**. *(emphasis added)*

The team did not attempt to quantify a reduced pipeline rupture frequency for the AIM pipeline near Indian Point, given the uncertainties. In the team's view, optimistic estimates of failure *frequencies* (one in a million per year or less) often lead the licensee or the NRC to assess failure *consequences* in less detail. Therefore, the team continued with its analysis with a more general failure frequency.

1.1.2. Risk Assessment and Mitigation

After construction, pipeline operators continue to assess and mitigate the risks to their pipelines through "integrity management" programs. For high consequence areas,[ii] the relevant requirements are in 49 CFR 192, Subpart O. The AIM pipeline near Indian Point is identified as being in a high consequence area, so these requirements apply. Relevant requirements for this case include:

- **Having an integrity management program (49 CFR 192.911, among others).** These programs include identification of high consequence areas, plans for various assessments, processes for continual evaluation, and certain procedures. Operators must continually improve their programs. The team obtained information from Enbridge verifying that it has an integrity management program and risk assessment process that manages, monitors, and addresses various types of corrosion, defects in the pipeline, third-party damage, operations issues, and weather. Enbridge's program manual lays out the general approaches taken by Algonquin Gas Transmission.[iii]
- **Assessing threats to the pipeline and taking actions to mitigate the risks (49 CFR 192.917 and 192.935, among others).** "Threats" for purposes of this assessment include those listed in the American Society of Mechanical Engineers and American National Standards Institute (ASME/ANSI) Standard B31.8S,[iv] such as corrosion, construction defects, third party damage, and human error. Operators use this standard to assess the risks associated with each threat and prioritize what baseline assessments and reassessments are needed, as well as what preventive and mitigative measures will be taken. Preventive and mitigative measures are based on the risk assessment and can include installing remote control valves, replacing pipe segments with pipe of heavier wall thickness, operating below 30 percent of the specified minimum yield strength,[v] and conducting training and drills. [insert enbridge]
- **Conducting a baseline assessment and continuous assessments (49 CFR 192.921, 192.937, and 192.939, among others).** As appropriate for the pipeline segments, the operator conducts internal inspections to detect corrosion or other threats, pressure tests in accordance with 49 CFR 192, Subpart J, "Test Requirements,"[vi] and direct assessments for corrosion. Operators must conduct this baseline assessment within 10 years from the date a pipeline is installed. The pressure test under 49 CFR 192, Subpart J, can satisfy the requirement for a baseline assessment. Operators must continue to assess the pipeline, with a reassessment occurring no more than 7 years after the baseline assessment. The reassessments, similarly, can also include pressure tests or direct corrosion assessments. [insert enbridge]

The team also gained access to a risk assessment contracted by the State of New York to assess infrastructure near the AIM pipeline and the risks of damage to the pipeline.[vii] The risk assessment was based on experts' judgment and did not quantify probabilities and consequences of specific

Commented [CT3]: @Theresa to add information when received from Steve.

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scenarios. This evaluation considered risks to pipeline integrity such as corrosion and other material issues, excavation and other sources of damage, as well as equipment and operational failures. All risks specific to Indian Point were categorized as "unlikely." Mitigation and emergency response strategies were identified for each, including actions that the New York State Department of Public Safety would take. The appendix on Indian Point pipeline impacts summarized publicly available analyses related to the pre-existing and AIM pipelines and referenced prior conclusions by the NRC and licensees.

Collectively, these ongoing activities provided the team with further confidence that a pipeline rupture is unlikely, though (as noted above) the team did not attempt to quantify the risk reduction from such activities.

1.1.3. Isolation of a Pipeline Rupture

If a rupture occurs on the AIM pipeline near Indian Point, the effects on the nuclear power plant would depend on the volume of gas released. The volume of gas released is a function of the speed with which the pipeline operator isolates the ruptured pipeline. It is also a function of the length of pipeline that would be isolated, which determines the amount of gas available to flow out the break and feed a fire or other consequences. Entergy and the NRC made different assumptions regarding these variables. The team obtained updated information from Enbridge on the methods that the pipeline operator would use to isolate a rupture of the 42-inch AIM pipeline.

Enbridge informed the team that the 42-inch AIM pipeline is continuously monitored from a gas control center in Houston, TX. The control center monitors pressures, flows, and compressor station status (including discharge and suction pressures). The Supervisory Control and Data Acquisition (SCADA) system is used to detect ruptures and was specifically enhanced to include a schematic screen to expedite evaluation and isolation of the pipeline. Alarms include a rate-of-change alarm that detects a pressure drop on the line. If the data indicates a rupture requiring valve closures, gas controllers have the authority, autonomy, and ability to close valves to isolate the pipeline. They are also trained to isolate other affected facilities including shutting down the compressor station across the Hudson River.

Enbridge has procedures for emergency notification, emergency response, alarm management, and response to abnormal operations that it would apply in these cases. The procedures indicate that the operator may have enough information from his data system, alarms, and trends to enable emergency response actions. If the data is not clear, the operators can use reports from outside sources such as emergency services or public officials to justify isolating a line. However, the controller is not required to have such verification to isolate the line if the data is clear.

The mainline valves for the 42-inch pipeline are remote-operated from the Houston control center. The control center can also monitor pressures on the upstream and downstream sides of the valves. **Enbridge estimated, based on tabletop training and operating experience, that it would take up to eight minutes to identify a rupture using the Supervisory Control and Data Acquisition system, confirm that the valves need to be closed, and close the valves. Enbridge noted that three minutes (previously referenced by Entergy) would be a "best case"; and that confirmation of the event could add additional time to the assumed closure time.** The team notes that data from actual accident experience, as discussed in Section 2.4, indicates that ruptured pipelines have taken minutes to hours to isolate, depending on a number of factors, including whether valves can be remotely operated or must be manually closed.

Enbridge informed the team that these mainline valves on the 42-inch AIM pipeline near Indian Point were closer together (i.e., could isolate a smaller segment of pipeline) than required by DOT

regulations. The team obtained schematics showing the location of mainline isolation valves near Indian Point. As has been stated in multiple other evaluations, the nearest remote-controlled valves to Indian Point are about 2.8 miles apart. The next closest downstream valve—which is also remote controlled—is about 5.6 miles downstream. The next closest upstream valve is associated with the Stony Point compressor station, about 2.5 miles further upstream. Based on the PHMSA team member's experience, in some cases the pressure drop from a pipeline rupture may make it challenging to close the nearest valve to a rupture, and operators may need to close a valve further from the rupture. **The team concludes that the minimum pipeline length that could be isolated is about 2.8 miles, and depending on circumstances, the pipeline length could be 5.3, 8.4, or 10.9 miles.**

As a result of this new information, the team recommends that Entergy reevaluate its assumptions of a three-minute pipeline isolation time and a gas volume based on approximately 3 miles of isolated pipe, as discussed in Section 2.6, to determine if changes to these factors have a significant impact on its original external hazard evaluation related to the 42-inch AIP pipeline. The related OIG finding is also discussed in Section 5.1.5.

1.2. Pipe Rupture Consequences – Overpressurization and Missiles

Regulatory Guide 1.91 states that "[a] demonstration that the rate of exposure to a peak positive incident overpressure in excess of 1.0 psi (6.9 kPa) is less than 10^{-6} per year when based on conservative assumptions, or 10^{-7} per year when based on realistic assumptions, is acceptable." Additionally, the guide states that "[i]f this criteria cannot be met, then the applicant may show through analysis that the risk to the public is acceptably low on the basis of the capability of the safety-related structures to withstand blast and missile effects associated with detonation of the potentially explosive material."

In the 2014 and 2015 10 CFR 50.59 evaluations,[viii] Entergy found that the frequency of a peak overpressure may be more than 10^{-6} per year, so a detailed evaluation was needed to illustrate that the safety-related structures could withstand blast and missile effects. For missile effects, Entergy noted that 900 feet is the greatest distance noted in the literature, which is less than the distance to any plant systems within the SOCA. For blast effects, Entergy calculated that a vapor cloud explosion would not damage important-to-safety SSCs within the SOCA.

The NRC staff's inspection report[ix] stated that:

> The staff determined that the impacts to the SSCs important-to-safety outside the SOCA from the proposed new pipeline are bounded by the impacts from low probability events of extreme natural phenomena (including seismic activity, tornado winds, and hurricanes) which have been previously assessed and are addressed in the Indian Point Units 2 and 3 [updated FSARs].

The team could not verify the assumption that the Unit 2 and Unit 3 updated FSARs bounded the impacts for missiles. Additional information on this assumption is provided in Section 5.2.2. However, for missiles, the team did find that the largest distance that a section of ruptured pipe has been thrown is approximately 600 feet. (According to PHMSA, the 900 feet reported by Entergy for one incident was an initial estimate by accident investigators, but the final established distance was 564 feet, which did not exceed the potential impact radius for the pipe.) For overpressurization, the team was not able to verify that there was no impact to SSCs required for safe shutdown. A probabilistic risk assessment was done to determine the increased risk to the plant from a pipeline rupture. Section 2.5 provides more information on this risk assessment.

Commented [SD5]: Was the 564 ft within the PIR? If so, we should inlcude that fact.

Commented [SD6]: If we say the team could not verify there is no impact on SSCs required for safe shotdaown from overpressurization, does that mean there could be an impact from overpressurization?

Team members at Sandia National Laboratories (SNL) performed a more detailed analysis. SNL evaluated whether the models specified in the RG 1.91 were used appropriately, verified the NRC analytical model results, and performed a preliminary vapor cloud dispersion simulation. In replicating prior NRC analyses, SNL determined that certain assumptions made by NRC may not be valid. The two major assumptions challenged by SNL's analysis include the immediate positive buoyancy of the methane cloud and the use of the TNT equivalency model for this scenario. The team recommends that RG 1.91 be reviewed to determine whether changes are needed to account for these findings, and to address the agency's expectations when detailed analyses are needed. Section 4.4 has more details on recommended changes to RG 1.91.

In the preliminary vapor cloud dispersion simulation (see Appendix B), SNL showed that an unmitigated dense cloud could form and travel far distances. These distances are consistent with PHMSA's document for vapor cloud dispersion[x]; however, the PHMSA report is typically only applied to nonflammable gases.[xi] Based on these findings, the team consulted with PHMSA pipeline accident investigators. They noted that rich gases such as butane or propane which are heavier than air, may form gas vapor clouds, they were unaware of any large natural gas (which is methane) transmission pipe ruptures that have resulted in delayed vapor cloud explosions. They agreed that methane gas under high pressures would initially be denser than air when being released after a pipeline rupture, but in their experience the dense gas may initially pool in the crater resulting ightom the rupture, but the gas will become lighter than air once as it leaveexpands it s the crater. Additionally, the team reviewed an Oak Ridge National Laboratory study performed for PHMSA in support of a rulemaking on the use of automatic and remote controlled isolation valves that noted blast and overpressure effects were not evaluated because they occur immediately after the pipe break.[xii] In the team's interview with an independent gas pipeline expert, he noted that the heat flux would be the more controlling scenario.

As noted in the analysis assumptions, the SNL preliminary evaluation did not quantify plant impacts or overpressures that may be experienced, and local terrain was not considered due to the limit timeframe to conduct the analysis. The SNL preliminary evaluation does note that if further analysis is to be conducted that terrain and local infrastructure should be included to determine the extent that the vapor cloud can travel. Experts from the NRC and PHMSA team believe that ~~T~~the local elevation change, river valley meteorology, and surface roughness would impact vapor cloud dispersion and generally preclude dispersion towards ~~to~~ the plant. If unmitigated dispersion were to occur, several ignition sources appear to exist between the pipeline and plant, such as the Buchanan switchyard. The team also notes that the concrete barrier above the pipe would likely create an ignition source, if a pipe rupture occurred. Given the accident experience from PHMSA, input from the independent pipeline expert, local terrain effects, and the presence of ignition sources, the team believes that there is reasonable assurance of adequate protection of the safety-related functions of the plant.

1.3. Pipe Rupture Consequences – Jet or Cloud Fires

Department of Transportation regulation 49 CFR 192.903, "What definitions apply to this subpart?" defines terms including "potential impact radius." The potential impact radius "means the radius of a circle within which the potential failure of a pipeline could have significant impact on people or property." The equation included in the regulation is:

$$r = 0.69\sqrt{p * d^2}$$

Commented [SD7]: We need to explain a bit more about "needing to address agency expectations for when a detailed analysis is needed IT isn't clear from the discussion in this paragraph

Commented [LA8]: Sentence isn't complete

Commented [LA9]: How do they know the cloud becomes buoyant if they are saying it ignites immediately?

Commented [LA10]: Should be noted that no evidence was presented to validate this statement by ORNL.

Commented [DS11]: Need to cite...how do we want to?

Commented [LA12]: These sentences infer that Sandia is making these statements. It should be made clear that NRC and PHMSA are making these statements.

Commented [LA13]: No mention is made regarding the potential for the jet fire to ignite surrounding fuels source such as vegetation, other structures, and fuel tanks which can propagate the fire. Also, is this equation being applied to both jet and cloud fires which are very different?

In this equation, r is the potential impact radius (ft), p is the MAOP of the pipeline (psi), and d is the pipeline diameter (in). This equation is associated with the heat-affected area,[xiii] as described further in the notice issuing the rule[xiv] and the technical basis provided in C-FER report prepared for the Gas Research Institute.[xv]

Based on the input from the team's PHMSA member and the team's interview with an independent gas pipeline expert, the potential impact radius is the radius for a person to get out of the area within 30 seconds and is not meant to be used to determine the survivability of buildings. They recommended multiplying the calculated potential impact radius by 1.5 to 2 as a "rule of thumb" to determine a safe distance for buildings. This aligns with the Oak Ridge National Laboratory report mentioned above[xvi] that evaluated the thermal impacts of double-ended guillotine breaks. The report noted that severe damage could occur within 1.5 to 1.7 times the potential impact radius. This conclusion is consistent with the risk assessment performed by New York State.[xvii]

Commented [HB14]: Cite to Kuprewicz's transcript? R. Kuprewicz Transcript at 25-26 (Mar. 19, 2020).

Using this formula for the 42-inch, 850-psi gas pipeline at Indian Point results in a potential impact radius of 845 feet. Doubling this number results in an expanded impact radius of 1,690 feet. This radius would extend into the the SOCA; however, it would not impact any safety-related structures.

Entergy found that at the SOCA fence, heat fluxes would be below 10 kW/m^2, and that the heat flux at 2,028 feet (a location inside the SOCA fence but not impacting safety-related systems) is only 5 kW/m^2.[xviii]

NUREG/CR-3330[xix] discusses the survivability of reinforced concrete at various heat fluxes for varying points inside a wall, the closest point being six inches inside the wall. At Indian Point Unit 3, the diesel generator building has the thinnest walls of all safety-related buildings at 24 inches.[xx] The thinnest point of containment is 42 inches,[xxi] and the thinnest point of the auxiliary building above ground is 30 inches.[xxii] NUREG/CR-3330 notes that at a heat flux of 15 kW/m^2, it will take 11.6 hours for temperature at six inches inside the wall to exceed 350 degrees Fahrenheit (177 degrees Celsius) and 5 hours if the heat flux was 50 kW/m^2.

The team's independent analysis based on calculations in NUREG/CR-3330 found that heat fluxes at the closest safety-related structure would be 11 kW/m^2 for a mass flow rate of 1940 kg/s. For a bounding flow rate of 4000 kg/s, the heat flux would be 21 kW/m^2. Even at the bounding flow rate, the pipeline would not need to be shut off for over eight hours. This greatly exceeds the estimated time it would take for the gas pipeline to be shut off; therefore, the heat flux would have no impact on safety-related structures. An appendix to the Sandia National Laboratories report (included as Appendix B to this report) presents this analysis in more detail.

The team concludes that a jet or cloud fire would not impact the plant's safety.

1.4. Historical Pipe Rupture Experience

To provide perspective for the team's analytical results, the team obtained information from PHMSA's accident investigation division on some actual pipeline ruptures. This information is summarized in Table 1. While this was a relatively small sample, it provided important background information to the team. In the table, the "impacted area" refers to the distance away from the pipeline where investigators found impacts as a result of the pipeline rupture. Impacted areas are generally an ellipse with a length parallel to the pipeline (and longer in the direction that had more compressed gas available) and a shorter width perpendicular to the pipeline. Most of these impacts were within or near the PIR, with none being further than 1.6 times the PIR. As noted above, isolation times can be relatively long in certain circumstances, such as when valves need to be locally operated or when shutting off the pipeline could have more significant consequences (e.g.,

Commented [CT15]: Confirm; Steve is checking whether the numbers are right for Artesia.

for customers who need heating) than the fire. PHMSA staff stated that fires do not ignite in all cases, as both an arc and the correct atmosphere are needed to ignite the gas vapors.

Table 1. PHMSA pipeline accident data showing pipe diameter and allowable pressure, calculated potential impact radius, impacted area, distance pipe was ejected, time to isolate the line, and duration of fire. "NR" is shown where data was not reported, and "N/A" is shown where the event did not occur.

Year	Location	Pipe Dia. (in.)	MAOP (psi)	PIR (ft.)	Impacted Area Length (ft.)	Impacted Area Width (ft.)	Pipe Ejected (ft.)	Isolation Time (h:mm)	Fire Duration (h:mm)
1985	Beaumont, KY	30	936	633	700	500	NR	NR	NR
2003	Viola, IL	24	975	517	not reported (NR)		554	8:48	11:55
2008	Appomattox, VA	30	800	585	566	200	N/A	NR	NR
2010	San Bruno, CA	30	375	401	375	160	100	1:35	2:35
2017	Dixon, IL	20	800	390	365	163	N/A	0:31	3:06
2018	Batesville, OH	24	1440	628	50	50	N/A	0:00	1:04
2018	Moundville, OH	36	1440	943	250	250	100	0:25	3:05
2018	Hesston, KS	26	899	538	400	200	254	0:02	2:44
2018	Buffalo, OK	26	765	496	110	60	170	1:09	N/A
2018	Woodruff, UT	20	918	418	143	90	430	1:21	N/A
2018	Dixon Springs, TN	22	773	422	30	20	75	0:38	N/A
2019	Caldwell, OH	30	936	633	500	500	N/A	1:35	14:05
2019	Mexico, MO	30	900	621	437	286	125	1:12	1:31
2019	Hot Springs, AR	30	1000	655	252	114	306	2:12	N/A
2019	Danville, KY	30	936	633	704	645	600	1:52	3:07
2019	Artesia, NM	20	1000	436	687	60	360	3:23	N/A

This experience, which is mostly from the last few years since PHMSA formed its accident investigation division, is generally consistent with earlier information included in the C-FER report referenced above.[xxiii] The C-FER report collected information on incidents from 1969 to 1995 and compared actual incident outcomes to the proposed hazard area model—which became the potential impact radius under 49 CFR Part 192. Figure 7 shows the comparison of distances that was included in the C-FER report. In all but one case, the potential impact radius was larger than the burn area or distance where any injuries was seen. Where the burn area was larger (NTSBPAR711), it was about 1.1 times the potential impact radius.

Figure 8 shows four examples of pipeline ruptures, including those with and without fires. The elliptical nature of the most severe impacts is demonstrated in the two left-hand images, fire and debris damage can be seen in the bottom-right image, and a rupture crater is shown clearly in the top-right image.

Commented [LA16]: Figure 8 is missing.

The team discussed pipeline ruptures with the PHMSA accident investigation staff who prepared the more recent data. The PHMSA staff confirmed that, in their experience, that they had never seen explosions occurring away from the initial rupture site or any other damage outside the area damaged by heat or fire. Also, in their recollection, only one of these (San Bruno) occurred within a high consequence area, and pipeline construction contributed to that failure.

1.5. Pipe Rupture Risk Assessment

The NRC uses a variety of methods to determine the safety significance of postulated events. Two of these methods use the insights from probabilistic risk assessments. One is the significance determination process,[xxiv] which uses risk insights, where appropriate, to help the NRC determine the safety significance of inspection findings. The other is Regulatory Guide 1.174, "An Approach for

Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis."[xxv]

Both of these approaches use the metric of change in core damage frequency resulting from the situation to assess an inspection finding or a licensing basis change. These approaches define a small change to be less than one in a million years (10^{-6}). The NRC uses the agency's independent risk models to evaluate the change in core damage frequency. The team, with support from experts at the Idaho National Laboratory, modified the Indian Point models to reflect a pipeline failure and conducted a risk analysis. The team assumed that a pipeline failure would cause an unrecoverable loss of the Buchanan switchyard and cause loss of the city water tank. Based on these analyses, the team found that the change for both plants was an increase of one in 63 million years (1.6×10^{-8} per year), which is well below the agency's defined threshold for a "small" change in risk of one in a million years.

Because of the uncertainty associated with the consequences of overpressurization from an explosion, the team also performed a sensitivity analysis. This analysis assumed that all equipment not in a seismic Category I structure (i.e., not located in the primary auxiliary building, diesel generator building, or reactor containment) was lost upon the pipeline rupture. These Category I structures like reinforced concrete containment structures, diesel generator buildings and auxiliary buildings are robust, safety-related, concrete structures designed to resist the effects of tornado missiles, tornado high winds and seismic events and postulated internal accidents. Reinforced concrete containment structures are especially robust in that they are also designed to resist internal pressurization from design basis events, which in the case of the Indian Point nuclear power plant containments includes a design pressure of 47 psi above the atmospheric pressure. According to structural engineering experts at the NRC, it is a good starting assumption that these three structures will be capable to withstand the pressures from the explosion associated with rupture from a gas pipeline at a distance of 2300 feet or greater. This starting assumption needs to be validated using information on (1) the credible blast or deflagration loads from the pipeline accident, (2) the structural properties of the structures such as the thickness, spans and reinforcements of their walls and roofs, especially for the auxiliary building for which the thickness of the walls can decrease with height, and (3) the details of their relevant design loads such as the tornado design missiles and high wind pressure loads. As discussed in Section 2.3, the minimum thickness of the walls for the auxiliary building is 30 inches. Additionally, the seismic Category I buildings are designed to withstand a pressure drop of 3 psi.[xxvi] Based on the input from structural experts, the team assumed that the overpressurization will not damage these Category I buildings. The team primarily evaluated Unit 3 for this sensitivity, since it is closer to the 42-inch AIM pipeline and would experience more severe impacts. The change in core damage frequency for this scenario was one in 5.7 million years (1.75×10^{-7} per year). Again, this is below the agency's threshold for a "small" change in risk of one in a million years.

The team was concerned that PHMSA's data provided a national pipeline mileage that included all diameters of pipes, not just large pipes, which could be non-conservative if used to calculate an event frequency. The team independently reviewed publicly available data.[xxvii] Using the last ten years' worth of data, the team determined Class 2, 3, or 4 carbon steel transmission lines with pipe diameters greater than or equal to 20 inches and maximum operating pressures greater than or equal to 300 psig rupture with a frequency of 2.4×10^{-5} per mile per year. The team recalculated the change in core damage frequency using this higher frequency and concluded that the change in risk remained below the agency's threshold for a "small" change in risk. More information on the team risk assessment and the PHMSA data can be found in Appendix C and Appendix D, respectively.

The agency's independent models only consider reactor risk, so the spent fuel pools and the dry fuel storage location must be considered separately. The spent fuel storage pit for Indian Point Unit 3 is a seismic Category I structure and is designed for a pressure drop of 3 psi. Given this rugged construction and the input from structural experts, the team concludes that a pipeline rupture would not negatively affect the spent fuel pit, though the surrounding building could be damaged. Indian Point Units 2 and 3 use the Holtec HI-STORM 100 dry cask storage system.[xxviii] The HI-STORM 100 dry cask storage system is also designed for for the same conditions as other Category I buildings. The team also concludes that the dry fuel storage location, which is much farther from the 42-inch AIM pipeline than the other structures evaluated, would not be negatively affected by a pipeline rupture.[xxix]

1.6. Recommendation – Ask Entergy to Revisit its 10 CFR 50.59 Evaluation

Although the team did not conclude that immediate regulatory action is needed regarding Indian Point, the team does recommend further work be done by Entergy to show that its prior conclusions remain valid. **Based on concerns raised by external parties and substantiated by the team, the team recommends that the NRC request Entergy under 10 CFR 50.54(f) to submit updated information regarding the implications of the assumption that the 42-inch AIM pipeline could be isolated within 3 minutes and the length of pipe that would be isolated.** Entergy should either revisit its analysis applying an updated assumption or providing a basis for why the assumptions are not relevant to the conclusions previously presented.

During the NRC's review of the October 2014 petition referenced in Section 1.2.4, the petitioner raised a concern that Entergy provided inaccurate or incomplete information contrary to the requirements in 10 CFR 50.9, "Completeness and accuracy of information."[xxx] The petitioner also asserted that the licensee may have violated 10 CFR 50.5, "Deliberate misconduct."[xxxi] The petitioner's concern centered on whether it was appropriate to model the 42-inch AIM pipeline being isolated in 3 minutes.[xxxii] To this day, the petitioner continues to assert that the Entergy knew that the isolation times were inaccurate and material to the NRC determination.[xxxiii]

For purposes of addressing the issue raised by the petitioner, deliberate misconduct occurs when a licensee voluntarily and intentionally (1) engages in conduct that it knows to be contrary to a requirement, or (2) provides materially inaccurate or incomplete information.[xxxiv] Specifically, the requirements in 10 CFR 50.5 state, in relevant part, that licensees may not:

> Engage in deliberate misconduct that causes or would have caused, if not detected, a licensee or applicant to be in violation of any rule, regulation, or order; or any term, condition, or limitation of any license issued by the Commission; or
>
> Deliberately submit to the NRC, a licensee, an applicant, or a licensee's or applicant's contractor or subcontractor, information that the person submitting the information knows to be incomplete or inaccurate in some respect material to the NRC.
>
> ...deliberate misconduct by a person means an intentional act or omission that the person knows: ... Would cause a licensee or applicant to be in violation of any rule, regulation, or order; or any term, condition, or limitation, of any license issued by the Commission; or ... Constitutes a violation of a requirement, procedure, instruction, contract, purchase order, or policy of a licensee, applicant, contractor, or subcontractor.

Similarly, 10 CFR 50.9 states, in relevant part, that:

Please note that certain cross references within the footnotes did not properly download; however, the footnote references are reflected in the final report (ML20100F635).

> Information provided to the Commission ... by a licensee ... shall be complete and accurate in all material respects.

Since the licensee's initial and revised 10 CFR 50.59 analysis, as described in Section 1.2.1 above, additional information has been developed that questions Entergy's assumptions on pipeline isolation. Because some of these initial assumptions have had reasonable challenges to their validity, the licensee should revisit its 10 CFR 50.59 analysis to verify whether its conclusion remain valid in light of this new information.

---

[i] Spectra (now Enbridge) informed Entergy that the pipe would have 0.72-inch wall thickness and be X-70 piping with 70,000 psi yield strength and 82,000 psig minimum tensile strength. The pipe would be procured from vendors who have passed a stringent quality audit, and full-time mill inspection would be performed by Algonquin Gas Transmission during pipe production. Specifications would require additional quality testing and integrity requirements beyond normal standards. These enhancements were discussed in a Spectra Energy (Algonquin Gas Transmission) memorandum to Energy regarding Response to Entergy Document entitled "Pipeline Enhancements Being Evaluated to Mitigate a Pipeline Failure," dated July 29, 2014.

[ii] Defined in 49 CFR 192.103; https://www.law.cornell.edu/cfr/text/49/192.903.

[iii] Spectra Energy, "Integrity Management Program (IMP) Manual," 09-0000, Revision 11, dated October 10, 2019. This manual is not publicly available, but Enbridge made it available to the team.

[iv] "Managing System Integrity of Gas Pipelines," published in 2018. Publicly available from https://www.asme.org/codes-standards/find-codes-standards/b31-8s-managing-system-integrity-gas-pipelines. The team had access to this standard through the NRC's subscription service.

[v] Specified minimum yield strength is defined in 49 CFR 192.3, "Definitions," https://www.law.cornell.edu/cfr/text/49/192.3. For the AIM pipeline near Indian Point, Enbridge specified that the piping would have a 70,000 psi yield strength.

[vi] https://www.law.cornell.edu/cfr/text/49/part-192/subpart-I

[vii] "Algonquin Incremental Market Pipeline Risk Analysis Report," transmitted from several New York State agencies to the FERC Chairman on June 22, 2018 (see note **Error! Bookmark not defined.** for a related letter). The report is marked privileged and confidential and may contain Critical Energy Infrastructure Information, as designated by the FERC. It is not available to the public.

[viii] See notes **Error! Bookmark not defined.** and **Error! Bookmark not defined.**.

[ix] See note **Error! Bookmark not defined.**.

[x] TTO-14, Derivation of Potential Impact Radius Formulae for Vapor Cloud Dispersion Subject to 49 CFR 192, January 2005; https://www.phmsa.dot.gov/pipeline/gas-transmission-integrity-management/derivation-potential-impact-radius-formulae-vapor

[xi] PHMSA Gas Integrity Management Insepction Manual, January 1, 2008; http://www.viadata.com/pipeliner/library_docs/GasIMP%20Protocols%20With%20Guidance%20(8%201%202008)%20w%20disclaimer.pdf

[xii] "Studies for the Requirements of Automatic and Remotely Controlled Shutoff Valves on Hazardous Liquids and Natural Gas Pipelines with Respect to Public and Environmental Safety," ORNL/TM-2012/411, dated October 31, 2012; https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/docs/technical-resources/pipeline/16701/finalvalvestudy.pdf

[xiii] Regulatory Guide 1.91 does not include any guidance on calculating heat fluxes associated with blasts. The guide assumes that overpressurization is the limiting scenario.

[xiv] 68 FR 69778, issued December 15, 2003; https://www.govinfo.gov/link/fr/68/69817. Additional information on this rule can be found in the docket folder at https://www.regulations.gov/docket?D=PHMSA-RSPA-2000-7666.

[xv] Dated October 2000; https://www.regulations.gov/document?D=PHMSA-RSPA-2000-7666-0049.

[xvi] See note xii

[xvii] See note vii

[xviii] See Note **Error! Bookmark not defined.**

[xix] Published September 1983; ADAMS Accession No. ML062260290.

[xx] Response to a Request for Additional Information regarding Order EA-12-049 and Order EA-12-051, dated December 2, 2016; ADAMS Accession No. ML16350A103.

[xxi] Indian Point Unit 3 Individual Plant Examination, dated June 1994; ADAMS Accession No. ML110320477

[xxii] Letter from J. Knubel, NY Power Authority to NRC on Indian Point, Unit 3, Transmittal of Individual Plant Examination of External Events (IPEEE); ADAMS Accession No. ML11227A102

[xxiii] See note xv

[xxiv] IMC-0609 issued January 2019; ADAMS Accession No. ML18187A187

[xxv] Revision 3 issued January 2018; ADAMS Accession No. ML17317A256

[xxvi] UFSAR Section 16.2; ADAMS Accession No. ML17299A229

[xxvii] From PHMSA Gas Distribution Incident Data - January 2010 to present (ZIP); https://www.phmsa.dot.gov/data-and-statistics/pipeline/distribution-transmission-gathering-lng-and-liquid-accident-and-incident-data

[xxviii] 77 FR 41454, issued July 13, 2012; https://www.govinfo.gov/content/pkg/FR-2012-07-13/pdf/2012-17110.pdf

[xxix] FSAR for HI-STORM 100; ADAMS Accession No. ML081350153

[xxx] https://www.nrc.gov/reading-rm/doc-collections/cfr/part050/part050-0009.html

[xxxi] https://www.nrc.gov/reading-rm/doc-collections/cfr/part050/part050-0005.html

[xxxii] 10 CFR 2.206 Petition Review Board, RE: Indian Point Nuclear Generating Unit, Docket No. 50-247, Transcript, (July 15, 205), p. 14, 16.

[xxxiii] The petitioner raised this issue during his interview with the team, as well in multiple instances of correspondence with the NRC.

[xxxiv] *See* Enforcement Manual, Part II-1: General Topics, Section 1.5.

From: Sanborn, Scott Edward
To: Dennis, Suzanne
Subject: [External_Sender] RE: RE: [EXTERNAL] RE: SNL memo
Date: Wednesday, April 01, 2020 11:36:56 AM

Hi Suzanne,

No problem with the conversion but I need to get the SAND number assigned through Sandia's R&A process (it' in the queue now). I can send you the pdf at that point.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 1, 2020 9:27 AM
To: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: RE: RE: [EXTERNAL] RE: SNL memo

Hi Scott,

I'm going to convert this to a PDF to make it easier to merge into our report...just wanted to make sure there wouldn't be any issues with that.

Suzanne

From: Sanborn, Scott Edward <sesanbo@sandia.gov>
Sent: Wednesday, April 01, 2020 10:15 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Cc: Luketa, Anay <aluketa@sandia.gov>; Mohmand, Jamal Ahmed <jamohma@sandia.gov>
Subject: [External_Sender] RE: [EXTERNAL] RE: SNL memo

Suzanne,

Thanks. Attached is the version, with the editorial changes made based on NRC's comments/feedback, in our R&A system to get a SAND number. If you have any more comments/feedback please let us know as soon as possible.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 1, 2020 7:32 AM
To: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: [EXTERNAL] RE: SNL memo

That sounds good!

From: Sanborn, Scott Edward <sesanbo@sandia.gov>
Sent: Wednesday, April 01, 2020 9:31 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: [External_Sender] SNL memo

Hi Suzanne,

Do you see any reason why the SNL memo should remain OUO? Jamal has made that change w.r.t. distance to be "Buildings that house Emergency Diesel Generators (EDGs) are approximately 700 meters from the pipeline". At present we are ready to mark the revised version to be unlimited release.

Thanks,

Scott

From:	Sanborn, Scott Edward
To:	Dennis, Suzanne
Cc:	Luketa, Anay; Mohmand, Jamal Ahmed; LaFleur, Chris
Subject:	[External_Sender] RE: [EXTERNAL] FOR REVIEW: draft team report (by 4/1?)
Date:	Wednesday, April 01, 2020 11:28:42 AM

Hi Suzanne,

The way this report is written it makes it seem like Sandia contributed to the entire report. It needs to be more clear that Sandia only contributed to the Appendix. To protect our technical integrity I'm requesting the following changes:

- Please remove our names from the Principal Contributors page;
- Please modify this sentence in section 1.3 with the addition in red "In addition, the NRC contracted for experienced researchers at Sandia National Laboratories to provide expertise on natural gas modeling and fire risk; their work is documented in Appendix B.
- Please remove our bios from the bio section, we can put those into our appendix.

The report needs to be clear that we did not contribute to the entire report, because we did not.

Anay and Jamal will have specific review comments.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Tuesday, March 31, 2020 2:20 PM
To: Luketa, Anay <aluketa@sandia.gov>; Mohmand, Jamal Ahmed <jamohma@sandia.gov>; LaFleur, Chris <aclafle@sandia.gov>; Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: [EXTERNAL] FOR REVIEW: draft team report (by 4/1?)

Hi SNL team,

As promised, attached is a working draft of the team's report. There are a few areas outstanding (including a couple things you are working on) as noted in comments in the margin. We will be finalizing later this week, we hope.

Could you please review and give us any comments/edits as soon as you can? We would like them by the end of the day on April 1 or mid-day on April 2, if at all possible. We can discuss on the phone any time you like.

The report is quite long, so if your time is short I would recommend a detailed review of Section 2 where pipeline experience is heavily referenced, and a less detailed review in other areas where NRC processes are the focus.

Thanks again for all of your continuing help. You have been a tremendous support to us.

Suzanne

From:	Sanborn, Scott Edward
To:	Dennis, Suzanne
Cc:	Luketa, Anay; Mohmand, Jamal Ahmed
Subject:	[External_Sender] RE: [EXTERNAL] RE: SNL memo
Date:	Wednesday, April 01, 2020 10:19:01 AM
Attachments:	NRC review memo Final.docx

Suzanne,

Thanks. Attached is the version, with the editorial changes made based on NRC's comments/feedback, in our R&A system to get a SAND number. If you have any more comments/feedback please let us know as soon as possible.

Thanks,
Scott

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Wednesday, April 1, 2020 7:32 AM
To: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: [EXTERNAL] RE: SNL memo

That sounds good!

From: Sanborn, Scott Edward <sesanbo@sandia.gov>
Sent: Wednesday, April 01, 2020 9:31 AM
To: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Subject: [External_Sender] SNL memo

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Thanks,

Scott

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Fax: (505) 284-8920
Email: aluketa@sandia.gov

Anay Luketa
Principal Member of Technical Staff

March 31, 2020

To: Suzanne Dennis
U.S. Nuclear Regulatory Commission

Subject: ***Review of NRC confirmatory analysis regarding fire and explosion for Algonquin gas transmission line at Indian Point nuclear power plant***

The following provides a review of dispersion and explosion hazard analysis conducted by staff at the U.S. Nuclear Regulatory Commission (NRC) [1] regarding a 42" diameter natural gas pipeline next to the nuclear power plant, Indian Point Energy Center (IPEC) near Buchanan, New York.

This review includes:

- Evaluation of whether the models specified in the US NRC regulatory guide 1.91 [2] were used appropriately.
- Verification of the results using the models used in the analysis.
- Preliminary vapor cloud dispersion simulation using Computation Fluid Dynamics (CFD).
- Summary of review.

The following provides further description of each of these items as well as results and discussion thereof. Note that the request by NRC was urgent and required that Sandia provided the review within three weeks. Because of the limited time available the independent analysis performed by Sandia is considered preliminary for reasons discussed in section 3.

Additionally, appendix A provides a calculation of incident heat flux seen at IPEC safety related reinforced concrete structures. The calculation is based on NUREG/CR-3330 which provides an analysis on the amount of time nuclear safety related concrete structures can withstand various incident heat fluxes [A.1].

1. Evaluation of the appropriate use of models:

a. Model Description

As specified in the US NRC regulatory guidelines 1.91, the NRC analysis uses the recommended ideal blast wave TNT equivalency method to determine the blast overpressure from a vapor cloud explosion. This method is described in a guideline document by Factory Mutual (FM) [3] cited in the NRC regulatory guidelines 1.91. The Factory Mutual document provides yield factors (or efficiency numbers) and heat of combustion values required as inputs into the model and discussion regarding the appropriate use and limitations of the model.

The equations used in the model are the following.

$$E = \alpha \Delta H_c m_f \quad (1)$$

$$W_{TNT} = \frac{E}{H_{detonation\,TNT}} \quad (2)$$

$$R_{min} = Z * W_{TNT}{}^{1/3} \quad (3)$$

where

E = blast wave energy
α = yield or efficiency number
ΔH_c = theoretical net heat of combustion
m_f = mass of vapor released
$H_{detonation\ TNT}$ = heat of detonation of TNT
R_{min}= distance from explosion where peak positive overpressure equals 1.0 psi (6.9 kPa)
Z = scaled distance (45 ft/lb$^{1/3}$or 18 m/kg$^{1/3}$)
W_{TNT} = TNT equivalent mass

b. Model inputs

Mass of vapor released

The NRC analysis considered the release from one side of the rupture and uses ALOHA to determine the mass of the vapor cloud. The scenario evaluated is of a full-bore above-ground release. Such a scenario was realized in the natural gas pipeline accident in Carlsbad, New Mexico as described in the National Transportation Safety Board report [4] in which a 49-ft section of corroded pipe was blown off through the soil leaving a large crater.

The pipeline is assumed to have manual closure of the isolation valves within 3 minutes where the distance between isolation valves is 3 miles. Thus, for a release from one pipe end rather that two, both isolation valves would have to be closed and the release would occur at one end of the 3-mile section or next to one of the isolation valves. Based on this distance, the pipe length was entered as 3 miles in ALOHA and the closed option selected which means the pipe is closed off at one end. ALOHA uses equations for choked flow assuming an ideal gas in which the flow rate

decreases over time due to the pressure drop and closed end of the pipe. The analysis considers a release over 1 minute using the maximum sustained average flow rate. An explosion calculation was also performed by NRC using ALOHA which calculates overpressure distances using the Baker-Strehlow-Tang method which incorporates general factors for obstacles that are not site specific.

The NRC guidelines 1.91 cite reference [5] for methods of estimating the mass of the vapor cloud. The reference provides a range of possible models to use from integral to CFD-based models and ALOHA is among those listed which is considered an integral-based model. ALOHA is not capable of modeling topography and geometry that reflects congestion at a particular site. It also does not have models for supercritical releases which will be discussed in section 3. The NRC guidelines does state:

> *"For releases of vapor clouds at offsite location or pipelines, plume modeling based on site topography and meteorological conditions should be evaluated. The atmospheric transport of released vapor clouds should be calculated using dispersion or diffusion models that permit temporal as well as spatial variations"*

Since ALOHA cannot model topography and temporal variations, it is not appropriate for use if the above guideline is to be followed. It also does not model supercritical fluids which require models for real gases since it assumes the ideal gas law.

Yield factor

The parameter, α, in equation 1 is the yield factor or efficiency number which indicates the fraction of available combustion energy participating in blast wave generation.

As stated in the FM guideline document,

> *"It cannot be overemphasized that assigning of an explosion efficiency number to a potential gas release incident is, with current technology, and entirely arbitrary exercise"*

This is a key point because as discussed in the FM guideline a release in a congested area such as dense vegetation, vehicles, and buildings can result in significantly higher overpressures. The congestion will result in a range of yield values which is not accounted for by the TNT equivalency method. It is also noted that the method represents the explosion as a point source which is not representative of the pressure signature of vapor cloud explosions which tend to have greater pressures in the far field and of longer duration than predicted from the model. Due to the point-source representation of the model, overpressures are overpredicted in the near field and underpredicted in the far field and are of shorter duration than vapor cloud explosions [3]. Lower overpressures of longer duration have the potential to be more damaging to structures than higher overpressures of short duration. It is further noted in the FM guideline that the method despite its drawbacks is often used to provide an approximate evaluation and that when very specific design basis building siting is required the method is inappropriate.

Related to the discussion provided in the FM guideline is the following statement provided in the NRC guideline 1.91:

> *"A detailed analysis of possible accident scenarios for particular sites, including consideration of the actual amount of potentially explosive material, potential release, site topography, and prevailing meteorological conditions, should be used to justify a value for the yield. However, for establishing safe standoff distances independent of site conditions, the use of a conservative estimate for the yield is prudent"*

The NRC guidelines 1.91 refers to the FM guideline for recommendations regarding the yield factor. The FM guideline recommends a yield factor of 0.05 for a Class I material such as natural gas based upon historical evidence which has indicated yields of 0.01 to 0.05 for typical hydrocarbons, though yields as high as 50% have been recorded and even very low estimated yields (~0.001) have caused extensive damage [3]. Thus, it's difficult to determine what value is considered conservative.

The NRC analysis used the recommended yield factor of 0.05 but did not account for site-specific conditions such as congestion and surrounding topography. A key question is whether the site surrounding the pipeline can result in much higher yields than 0.05 given the congestion as shown in Figure 1. The pipeline shown in Figure 1 is between IPEC and Buchanan or approximately 1600 ft from IPEC. It is evident that the surrounding area is highly congested with vegetation, structures, and vehicles indicating that more detailed analysis would be warranted based on recommendations in both guidelines. The FM guidelines recommends the TNO Multi-Energy Model for congested sites and is discussed in that document. The main assumption of the NRC analysis is that the since the vapor cloud is buoyant will rise and rapidly disperse above the surrounding vegetation and structures. This validity of the assumption will be discussed in section 3.

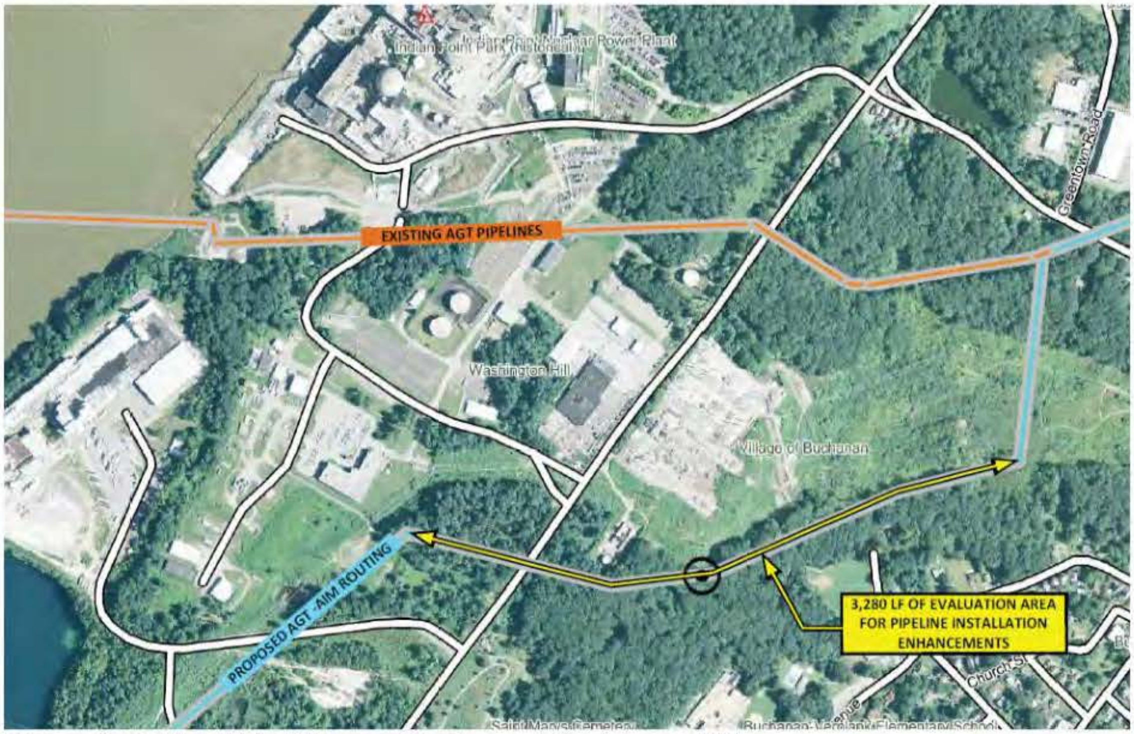

Figure 1: Indian Point Energy Center and Buchanan, NY.

Heat of Combustion

The NRC guidelines 1.91 refers to either NUREG-1805 [6] or the FM guidelines for the heat of combustion, though the FM guidelines does not specify the value for methane or natural gas. In ref. [6] the heat of combustion for liquefied natural gas composed mostly of methane is provided as 50,000 kJ/kg. The NRC analysis used a value of 50,030 kJ/kg for methane. This results in a higher blast wave energy, though of an insignificant amount (0.06%) compared to using a value of 50,000 kJ/kg.

Heat of Detonation

In equation (2) the denominator, that is the heat of detonation, is given as 4420 kJ/kg (1900 BTU/lb_m) in the NRC guidelines 1.91 where reference [7] is cited as the source for the value. The reference [7] source provides a value of 4500 kJ/kg (1935 BTU/lb_m) rather than 4420 kJ/kg. To check the validity of these values, a resource by a recognized expert in the field of explosives [8] was used. Reference [8] states that the heat of detonation can be determined using three approaches, two theoretical approaches and experimentally. From a theoretical approach using the thermodynamic work function the value is 4853 kJ/kg and that using the hydrodynamics work function the value is 4519 kJ/kg. Experiment has indicated a value of 4686 kJ/kg. Thus, among these values the most conservative is 4519 kJ/kg which is above 4500 kJ/kg indicating that 4500 kJ/kg is a reasonable value to use. It is uncertain as to where the value 4420 kJ/kg was obtained in the NRC guidelines.

Duration of release

The amount of mass of vapor used in equation 1 is determined by the duration of the release. Based upon discussion via teleconference with the author of the NRC analysis, a key assumption of the

NRC analysis is that the vapor cloud will be buoyant and disperse within the first minute and thus only considered the mass released over 1 minute. The full release duration is never considered whether the release is 3 minutes or 60 minutes thereby making the time at which the isolation valves are closed irrelevant. There is no evidence or justification presented for this assumption. Note that it is recommended in the FM guideline document that for a pipeline release it should be assumed that the pipeline is completely severed, and the duration of discharge should be 10 minutes flowing from both ends of the severed pipe even if automatic or manual block valves are present. An exception to this recommendation is not made for methane in the FM guideline.

2. Verification of the results

a. *Explosion*

The results of the explosion calculations by the NRC analysis and verification by Sandia National Laboratories (SNL) are provided in Table 1. Note that the pipeline pressure is 850 psig and in ALOHA the absolute pressure should be entered which would be 864 psia. Based on this verification, the NRC analysis appeared to have used 850 psia which does provide a flow rate of 256,000 lbs/in. If 864 psia is used, the average flow rate would increase to 261,000 lbs/min and the resulting distance to an overpressure of 1 psi is 2365 ft which is not a significant different than the distance of 2351 ft obtained from the NRC analysis. Note that in Table 1 the distance verified by Sandia is using a pressure of 850 psia to determine if the NRC results could be reproduced.

The NRC analysis used the maximum average flow rate obtained from ALOHA from a closed-end 3-mile pipeline, considering a release for 1 minute before the cloud is ignited. The NRC analysis used both the TNT equivalency method and ALOHA to calculate the blast overpressure distance to 1 psi. The delay time that was used for the ALOHA calculation for the 1-minute release was not specified in the NRC analysis. SNL could only reproduce the results approximately if a delay time of 8 minutes is specified providing a distance of 3057 ft. If the delay time is not specified, but is chosen by ALOHA the distance is much greater, providing 9504 ft. The distance calculated by NRC using ALOHA for this case was discounted as mentioned in the report that vapor dispersion in a congested area is not credible because the methane cloud is buoyant and will quickly rise and disperse rapidly.

The NRC analysis also considered a 60-minute release using ALOHA to calculate the maximum average sustained flow rate of 311,000 lbs/min. The mass released over the first minute was considered and not the total mass released over 60 minutes. The NRC analysis assumes that since the cloud will be buoyant it will disperse within 1 minute and thus an explosion will occur during the first minute independent of release duration and thus uses a mass of 311,000 lbs for the TNT equivalency calculation. If the cloud is not immediately buoyant, then for a 60-minute release using the total mass calculated by ALOHA the result in 8872 ft or 1.7 miles. The assumption of whether the vapor cloud is immediately buoyant or if it behaves as a dense gas which will greatly extend the time before the cloud is diluted below the lower flammability limit is discussed in section 3a.

Table 1: Results of explosion calculation for NRC analysis and SNL verification

Scenario	Pipe distance	Mass released	Distance to 1 psi blast overpressure	Results of verification by SNL using same methods
Explosion from one side of full-bore rupture release	3 miles (distance between isolation valves)	256,000 lbs for 1 minute using 'closed' end of pipe option in ALOHA	2351 ft (TNT) 3054 ft (ALOHA, with congestion)	2349 ft (TNT) 9504 ft (ALOHA, with congestion)
Explosion from one side of full-bore rupture release	3 miles (distance between isolation valves)	Release over 60 minutes using 'infinite source' option in ALOHA. • 311,000 lbs/min maximum average sustained flow rate • Total amount released 13,785,499 lbs	2509 ft (TNT - mass released for first minute)	2507 ft (TNT – mass released for first minute) 8872 ft (TNT – total mass released)

3. Computational fluid dynamics simulations

A preliminary simulation was performed to determine the extent of the vapor cloud using two Computation Fluid Dynamics (CFD) codes, namely ANSYS Fluent for supercritical pipe flow and Fire Dynamics Simulator (FDS) for dispersion. The results from the pipe flow simulation is used to provide an approximate boundary condition for the natural gas release in FDS. Two separate simulations were performed because the pipe flow involves very high-speed flow which requires very small timesteps which would greatly increase the dispersion calculation if both the pipe and dispersion flow were coupled in a single simulation. Thus, pertinent values for the pipe flow simulation were assessed several diameters from the pipe exit where velocities are much lower than near the exit. FDS was chosen to perform the dispersion simulation instead of ANSYS Fluent because FDS has been validated for dense-gas dispersion [9], though ANSYS Fluent has the pertinent physics to model dispersion.

It is highly stressed that the simulations are considered preliminary because a simulation study involves validation, evaluation of parameter sensitivity, and evaluation of grid independence to evaluate the level of uncertainty in predictions. Additionally, the accuracy of the real-gas equation of state used has not been evaluated. Other models specifically for natural gas have been recently developed [10] [11] but require extensive effort to implement into ANSYS Fluent which would not allow for this review to be completed in the timeline required. Also due to the limited time available to perform this analysis, the actual topography of the site is not included in the dispersion calculation and the simulation assumes a flat plane.

a. Pipe simulation

The flow of natural gas in the 42" diameter pipe is supercritical at 850 psi for temperatures 200 K and greater shown in Figure 2. Thus, a real-gas equation of state is used rather than the ideal gas equation. The flow is under-expanded choked flow in which the Mach number is 1 at the exit. Specifications provided in Table 2 and the domain shown in Figure 3 were used for the simulation.

Results from this simulation are shown in Figures 4 through 7. Figure 4 shows an axisymmetric contour plot of the Mach number which indicates choked flow. Figure 5, showing an axisymmetric contour plot of velocity, indicates that the velocity at the exit of the pipe is about 375 m/s and that a downstream shock wave occurs which has a velocity of about 970 m/s. Especially significant to this review are the temperature and density contour plots shown in Figure 6 and Figure 7, respectively, since the statement has been made in the NRC analysis that the vapor cloud will immediately become buoyant. The results indicate that the region just before the shock wave would result in condensation of the methane and in regions after the shock would condense water allowing for the cloud to be visible. Note that the simulations did not include multiphase flow but would be required for a detailed analysis.

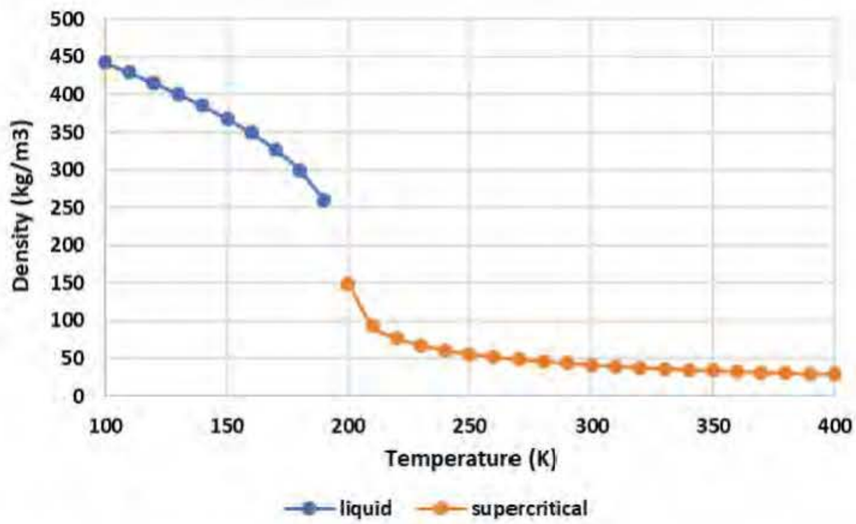

Figure 2: Temperature versus density of methane at 850 psi (https://webbook.nist.gov/chemistry/fluid).

Table 2: Specifications for pipe flow simulation

Specification	Value
Pipe diameter	1.07 m
Pipe length	100 m
Length, height of region beyond the pipe	50 m, 25 m
Fluids	methane, air
Equation of State	Soave-Redlich-Kwong
Inlet temperature	283 (K) (50°F)
Inlet pressure	5.861 (MPa) (850 psi)

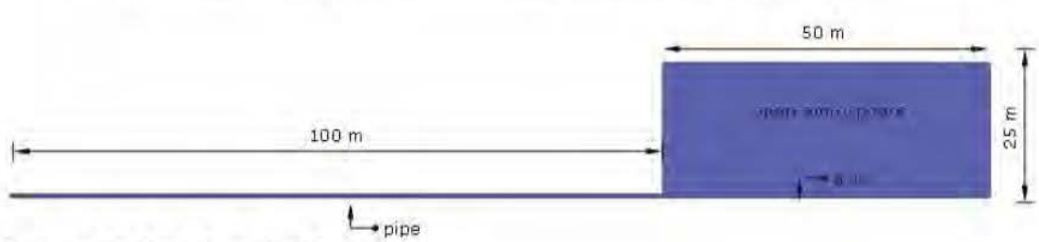

Figure 3: Domain for pipe simulation.

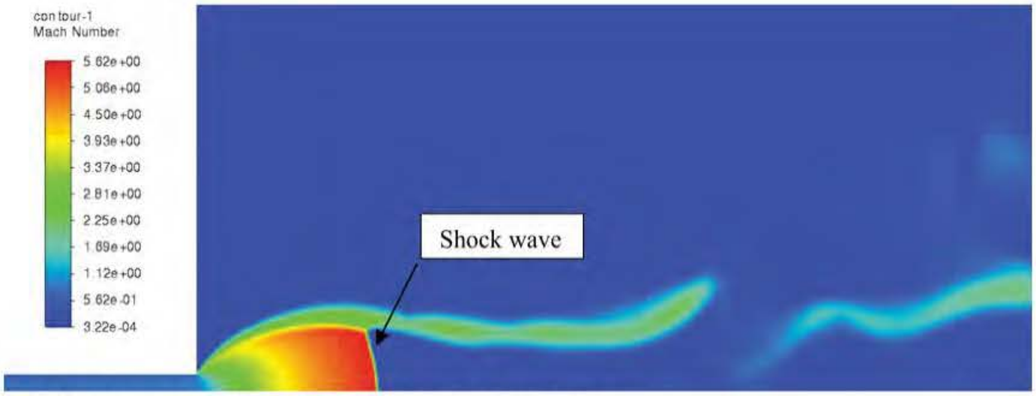

Figure 4: Axisymmetric view of Mach number contours.

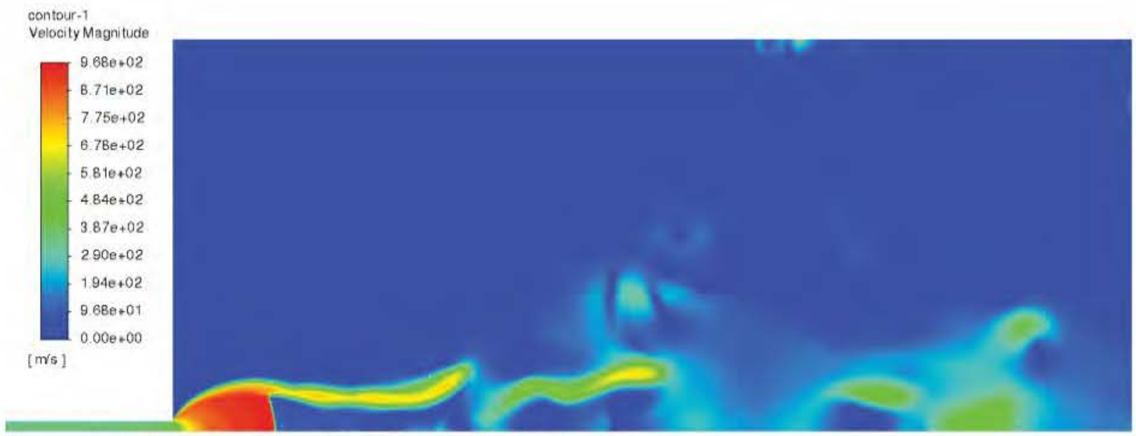

Figure 5: Axisymmetric view of velocity contours.

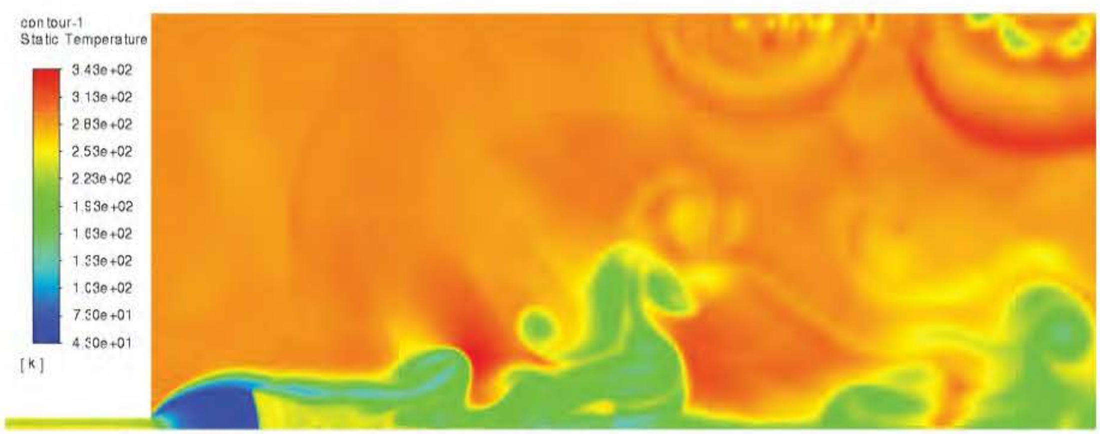

Figure 6: Axisymmetric view of temperature contours.

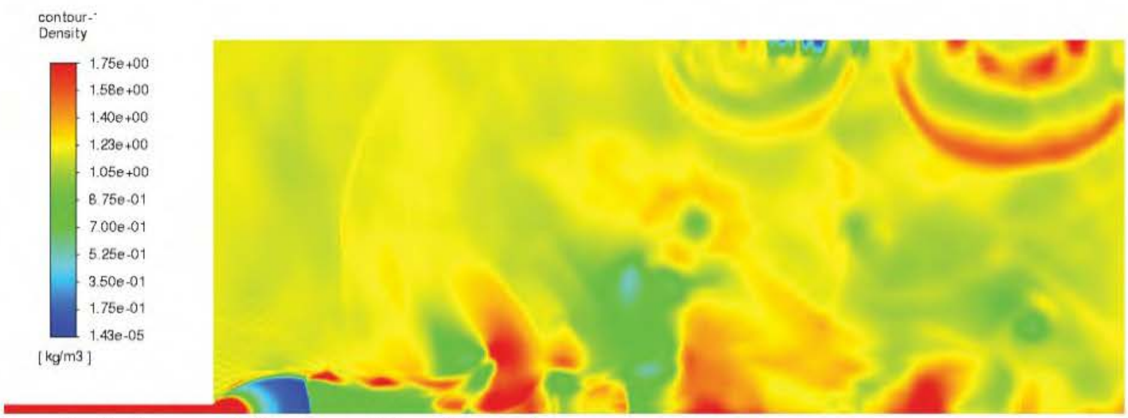

Figure 7: Axisymmetric view of density contours.

Under-expanded compressible flow can produce a series of progressively weaker shock waves that form a diamond pattern. The pattern will not continue indefinitely but will be diffused from viscous effects and will no longer maintain their pattern. The pattern formed will depend on the exit pressure which for this simulation was approximately 350 psi (2.3 MPa or 24 bar). Illustration of variation of patterns is shown in Figure 8 which are simulation results taken from reference [12] of under-expanded methane jets for two different exit pressures, 20 bar (290 psi) and 12 bar (174 psi). Notable is that both cases results in regions of condensation. The pattern of the simulation results presented in Figures 4 through 7 are closest to the exit pressure of 12 bar shown in Figure 8b. Though this should be caveated with the understanding that this is a preliminary simulation and that additional investigation is needed to improve accuracy for the reasons noted previously. For instance, the region beyond the pipe exit uses a stretched mesh in which cell sizes become increasing larger further away from the exit. It was necessary to use a relatively coarse mesh in this region in order to reduce computational run time to meet the project's timeline. Since the flow may not be sufficiently resolved past the initial shock wave, potential subsequent shocks forming the diamond pattern may not be captured. Also, due to the under resolution, the turbulence viscosity was artificially high which resulted in enhanced mixing. It is anticipated more detailed structure similar to reference [12] would be captured as the mesh is refined possibly showing additional regions of condensation.

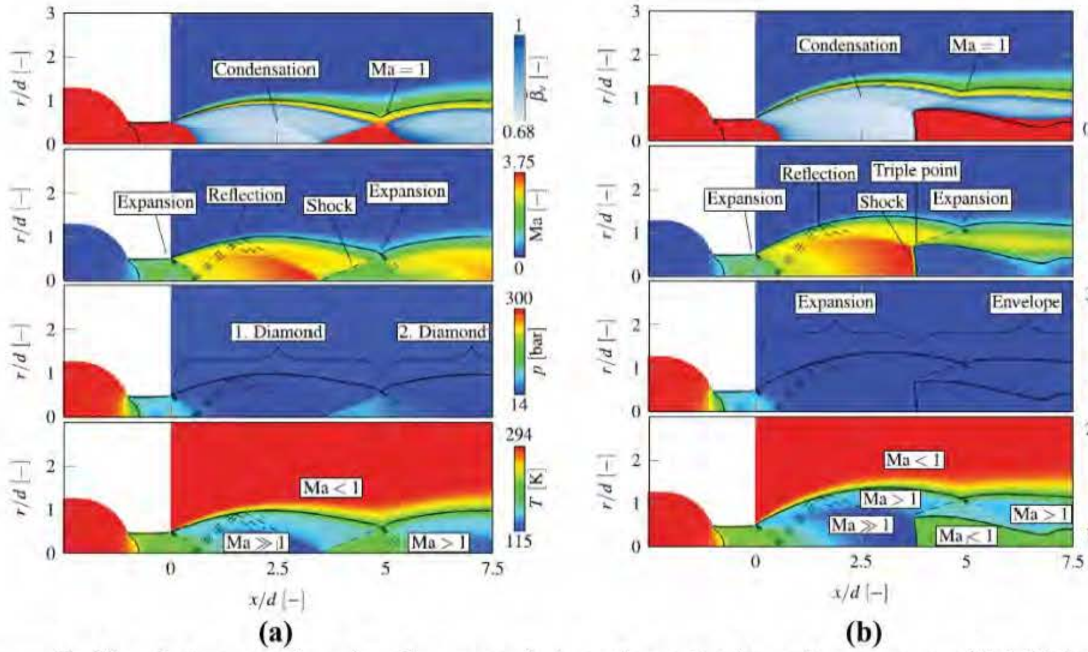

Figure 8: Simulation results of underexpanded methane jet for exit pressure of (a) 20 bar and, (b) 12 bar. Figure taken from Banholzer, M, et al., "Numerical investigation of the flow characteristics of underexpanded methane jets", Phys. Fluids, 2019 [12].

The results from the present simulation and from reference [12] indicate that the vapor cloud would be a dense gas initially and not be immediately buoyant. Furthermore, the NRC analysis provides additional supporting evidence to the above that the issuing gas would be heavier than air. The NRC analysis uses a flow rate of 256,000 lbs/min (1939 kg/s) and a methane density issuing from the pipe exit of 0.67 kg/m^3 which is less dense than air. Given the area of the pipe (0.89 m^2), the resulting exit velocity would be 3,961 m/s for this assumed density which would not be choked flow. To satisfy choked flow with an exit velocity of about 375 m/s, the density would have to be around 6 kg/m^3.

This has significant consequences for explosion hazards since dense gas vapor clouds in stable atmospheric conditions can travel significant distances [13] and will persist much longer than 1 minute. Additionally, the dense vapor cloud would travel through the surrounding vegetation and other infrastructure to provide an environment for a deflagration to detonation transition (DDT). Particularly since the natural gas is not 100% methane but can have up to 5% of other hydrocarbons such as ethane and propane. Small additions of these hydrocarbons can increase the sensitively of the gas to detonation [13].

Thus, it is recommended that the TNT equivalency model not be used but rather use a model that can include the effects of congestion such as the TNO multi-energy method [3]. And, if using ALOHA for explosion hazard assessment it is recommend that the 'congested' option be used. For a 256,000 lbs/min released from one end of the pipe for either 1 minute or 10 minutes using ALOHA with the congestion option, distances to 1 psi overpressure of 1.8 miles and 5 miles are predicted, respectively. As noted previously, ALOHA calculates overpressure distances using

the Baker-Strehlow-Tang method which incorporates general factors for obstacles which are not site-specific and thus isn't considered as accurate as the TNO multi-energy method.

b. Dispersion simulation

The simulation of the vapor cloud dispersion assumes that the safety valves could be shut in 12 minutes, doubling the time provided in the report by the Office of Inspector General of the NRC [14] from an interview with the Enbridge Energy Corporation, owners of Algonquin, which stated that it would take a minimum of 6 minutes to shut the isolation valves. For this preliminary simulation, the same flow rate as used by the NRC analysis of 256,000 lbs/min (1939 kg/s) was assumed for a double-sided full-bore release. This is because the release rate depends on the pipe length and the simulation of the pipe used a length of 100 m rather than a length of 3 miles due to computational run time. For any future investigation, flow rate as a function of pipe length should be evaluated. Note that for the pipeline, given the much greater range of operating pressures above atmospheric, the flow will be in a thermodynamic state to result in a gas density that is heavier than air. Thus, within the potential flow rates arising from the range of operating pressures, the gas will be denser than air. Based on the findings from the pipe simulation, the density of the gas is specified as 1.5 kg/m^3 by evaluating regions beyond the shock wave. Thus, the gas will be heavier than air and will persist and spread much further than if the cloud was lighter than air. Since the CFD code, FDS, used to model the vapor dispersion is designed for low Mach number flows, that is, Mach numbers up to about 0.3 a release velocity of 50 m/s is used which is about Mach 0.15, well below the limits of FDS. To use this velocity and match the mass release rate of (1939 kg/s), the area of the release had to be increased relative to the pipe diameter, that is, from 1.1 m to 6.6 m. Thus, the details of the dispersion will not be representative of the actual pipe near the release but will be representative of the vapor cloud in the far field providing an estimate of the extent of dispersal. The release is also above ground, but it is anticipated that the vapors would fill and eventually overflow a crater formed from a release. The specifications used in the simulation is provided in Table 3.

Table 3: Specifications for dispersion simulation

Specification	Value
Duration of release	12 minutes
Diameter of release	6.6 m
Mass release rate	1939 kg/s (256,000 lbs/min) from two horizontal full-bore releases directed towards each other placed 15 m (50 ft) apart
Fluids	methane, air
Density of methane	1.5 kg/m^3
Atmospheric conditions	Stable (Monin-Obhukov relations), wind speed 1.5 m/s, temperature 293 K
Number of elements	80 M
Element size	0.2 m
Number of processors	168

The computational run time was much longer than typical dispersion simulations because of the relatively high release velocity (50 m/s vs. ~1 m/s). Typically, dispersion simulations will take about 1-2 days to complete depending on the number of elements required. For this dispersion simulation it

took about a day to complete 200 seconds of real time. With an ending time of 1800 seconds, it would take about 9 days to complete. The simulation was terminated unexpectedly from the high-performance compute cluster, possibly due to high demand, at almost 500 seconds of real time and was not restarted in order to meet the project's timeline. At almost 500 seconds the vapor cloud reached the lower flammability limit (LFL – 5% vol.) at a distance of about 950 m (3,100 ft) from the release point. Since the release doesn't terminate until 720 seconds (12 minutes), it is anticipated that the distance would increase if the simulation was continued. Also, even after the release is terminated, the cloud will drift downwind and take several minutes to dissipate resulting in greater distances to the LFL. Given the above, it is anticipated that the distance would extend beyond 1,600 m (5,248 ft) since the cloud is propagating in the downwind direction at a speed of about 100 m/min. Figure 9 through Figure 16 shows a temporal sequence of the development of the vapor cloud from 1-8 minutes by plotting contours of methane volume fractions at the upper flammability limit (UFL – 15% vol.) and LFL . If the cloud reaches an ignition point within the flammability region an explosion can occur. Note that the cloud in the lateral extent is propagating beyond the computational domain indicating that for any future investigation the domain should be increased in the lateral extent.

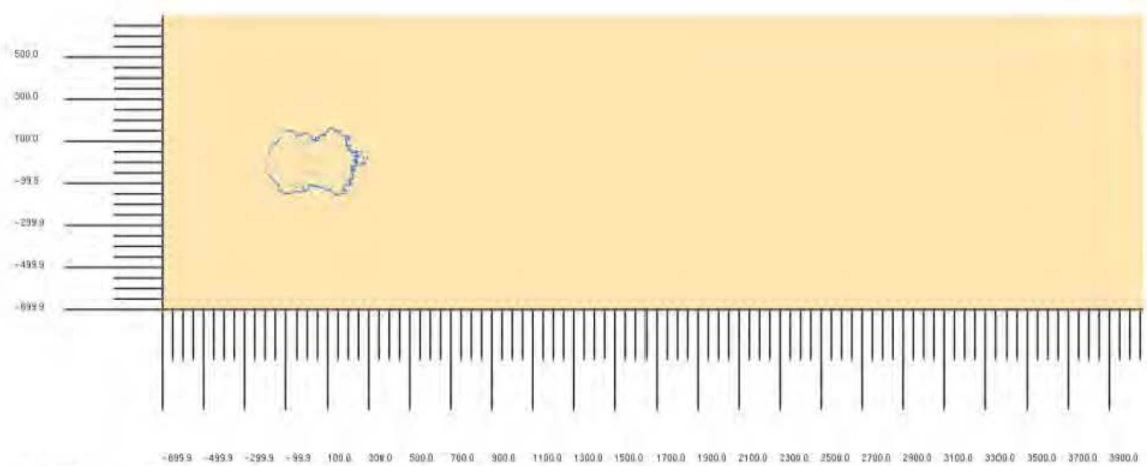

Figure 9: Top-view image of UFL (light blue) and LFL (dark blue) contours 1 minute after release. Distances are in meters.

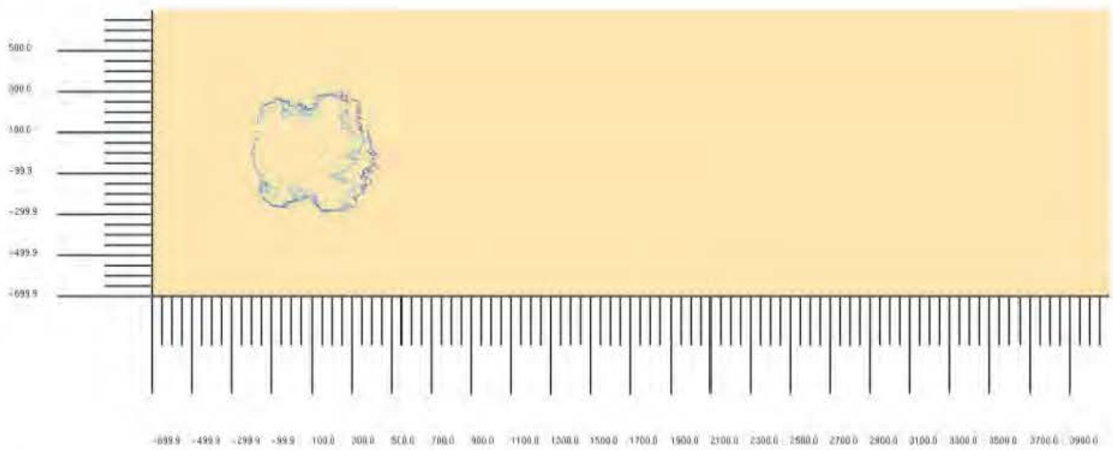

Figure 10: Top-view image of UFL (light blue) and LFL (dark blue) contours 2 minutes after release. Distances are in meters.

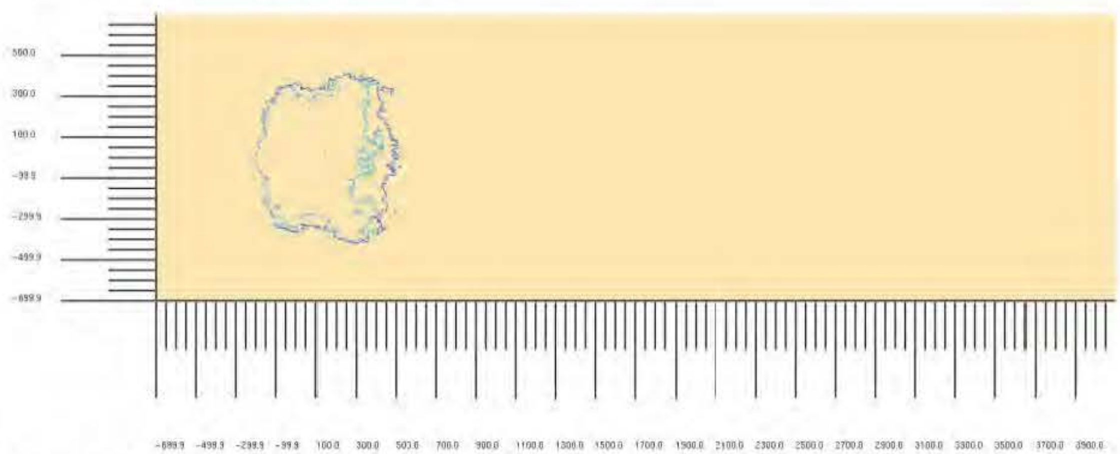

Figure 11: Top-view image of UFL (light blue) and LFL (dark blue) contours 3 minutes after release. Distances are in meters.

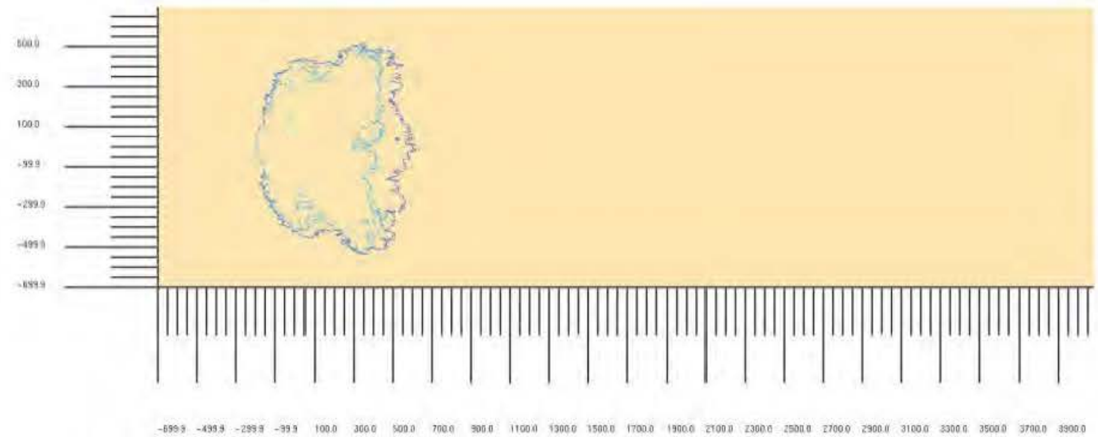

Figure 12: Top-view image of UFL (light blue) and LFL (dark blue) contours 4 minutes after release. Distances are in meters.

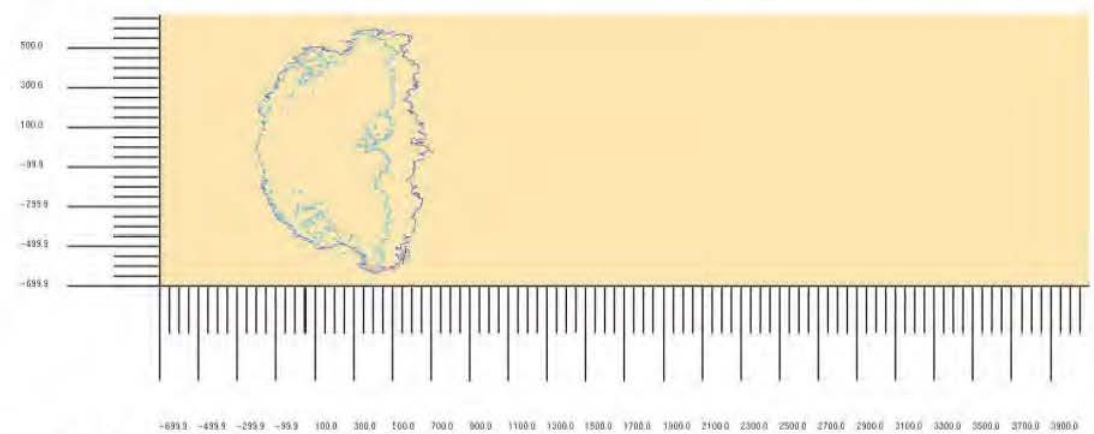

Figure 13: Top-view image of UFL (light blue) and LFL (dark blue) contours 5 minutes after release. Distances are in meters.

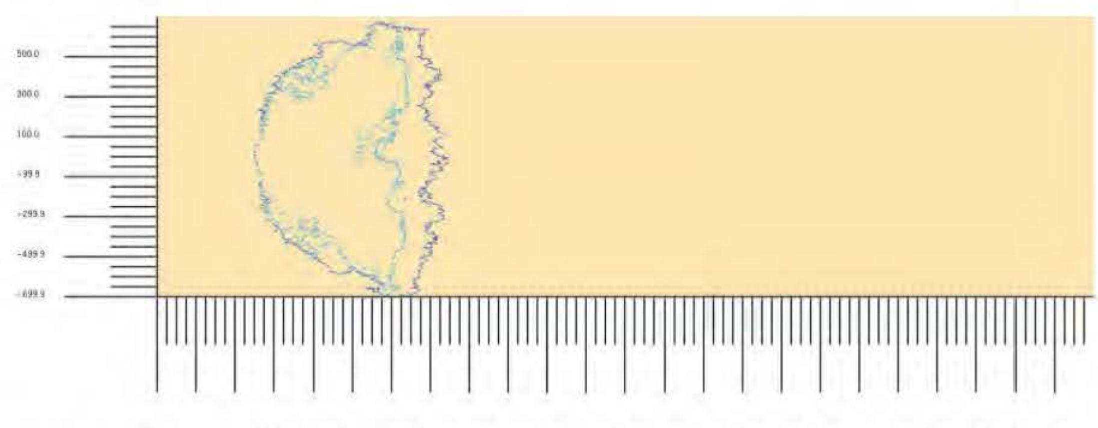

Figure 14: Top-view image of UFL (light blue) and LFL (dark blue) contours 6 minutes after release. Distances are in meters.

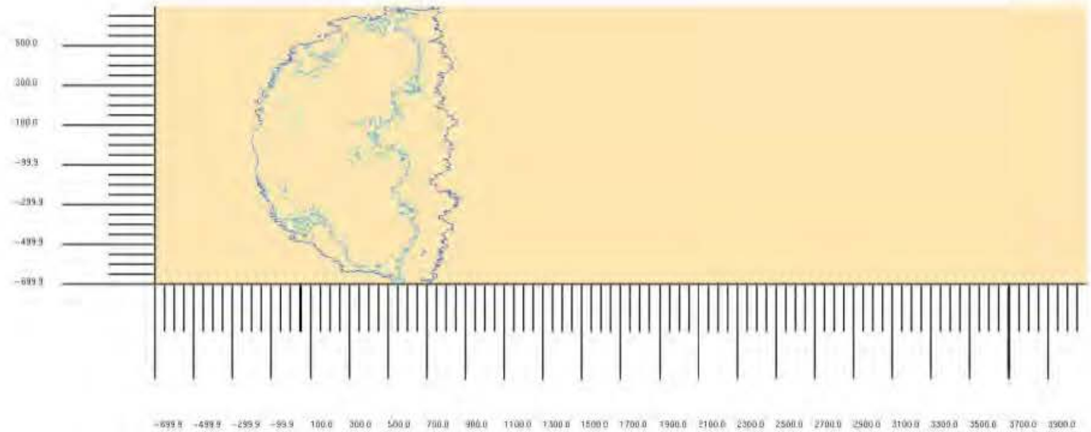

Figure 15: Top-view image of UFL (light blue) and LFL (dark blue) contours 7 minutes after release. Distances are in meters.

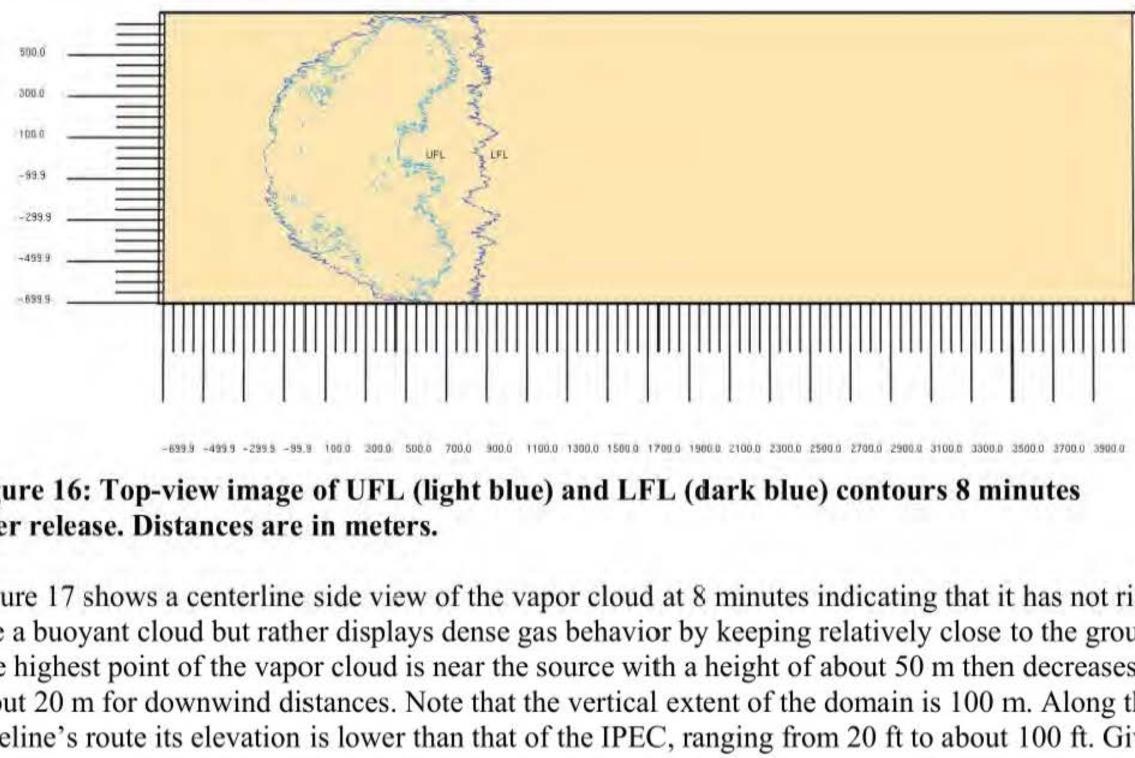

Figure 16: Top-view image of UFL (light blue) and LFL (dark blue) contours 8 minutes after release. Distances are in meters.

Figure 17 shows a centerline side view of the vapor cloud at 8 minutes indicating that it has not risen like a buoyant cloud but rather displays dense gas behavior by keeping relatively close to the ground. The highest point of the vapor cloud is near the source with a height of about 50 m then decreases to about 20 m for downwind distances. Note that the vertical extent of the domain is 100 m. Along the pipeline's route its elevation is lower than that of the IPEC, ranging from 20 ft to about 100 ft. Given this difference in height and the height of the cloud, the cloud can migrate over the hills if the wind direction is towards the IPEC. Since the wind can be in any direction, the dispersion calculation

assumes the wind direction is towards the SOCA.

Figure 17: Centerline side view of vapor cloud showing contours of methane volume fraction at 8 minutes.

This dense gas behavior has implications with regards to explosion hazards since the vapor cloud would travel through vegetation and persist for a sufficient amount of time to result in potential ignition which can lead to a deflagration to detonation transition due to the congestion or have overpressures that exceed 1 psi from a deflagration explosion. The vapor cloud region between the flammability limits is roughly 1/3rd the cloud volume and if the cloud encounters an ignition source in congested areas, significant overpressures can result. At approximately 6 to 7 minutes after release the flammability region of the vapor cloud will be either near or begin to engulf the SOCA and can result in an explosion with a high likelihood of exceeding an overpressure of 1 psi at the SOCA if ignited within the flammability region. The furthest point downwind distance within the flammability region is about 950 m (3,100 ft) at 8 minutes which is greater than any distance from the pipeline route to the SOCA (Security Owner Control Area) which varies from about 1580 ft to 2363 ft. At 8 minutes the flammability region would surround the SOCA. The results from this simulation indicate that for this release scenario explosion overpressures of greater than 1 psi at the SOCA would most probably occur given the surrounding congestion. Instances of natural gas pipeline accidents in which the natural gas was not immediately ignited at the release point and indicated that the cloud was not immediately buoyant can be found in references [15] [16].

4. Summary of review

The following are the key findings from this review:

1. Evaluation of models used:
    - Correct heat of detonation value was used;
    - ALOHA does not model supercritical flow and topography which is applicable to this release scenario.
    - TNT equivalency model is inadequate for the release scenario.

2. The major assumptions of the NRC analysis that results in an underprediction of distances to an overpressure of 1 psi are:
   - The cloud will become immediately buoyant and disperse below the flammability limits within 1 minute regardless of when the pipeline can be closed. Thus, only the mass released over 1 minute is considered in the TNT equivalency calculations.
   - The cloud will not propagate through vegetation and congested areas since its density will be less than air.

3. The major findings from the preliminary SNL analysis are:
   - The vapor cloud will be heavier than air which will cause it to disperse near the ground and will persist after the pipe has been closed.
   - The dense-gas vapor cloud will propagate through the vegetation and congested areas which increases the likelihood of a deflagration to detonation transition.
   - Simulation results indicate that at approximately 6 to 7 minutes after release the flammability region of the vapor cloud will be either near or begin to engulf the SOCA and at 8 minutes the flammability region would surround the SOCA. Thus, if the cloud is ignited within the flammability region, the explosion would have a high likelihood of exceeding an overpressure of 1 psi at the SOCA.

It is highly stressed that the simulations are considered preliminary because a simulation study involves validation, evaluation of parameter sensitivity, and evaluation of grid independence to evaluate the level of uncertainty in predictions. Also, the accuracy of the real-gas equation as not been evaluated for the pipe simulation and the actual topography and infrastructure of the site is not included in the dispersion simulation.

References

[1] Rao Tammara, US Nuclear Regulatory Commission, "Safety Review and Confirmatory Analysis, Entergy's 10 50.59 Safety Evaluation, Algonquin Incremental Market (AIM) Project, Indian Point Energy Center (IPEC)," October 16, 2014, also supplementary analysis undated.

[2] US Nuclear Regulatory Commission, Regulatory Guide 1.91 , "Evaluations of Explosions Postulated to Occur at nearby Facilities and on Transportation Routes Near Nuclear Power Plants," Revision 2, April 2013.

[3] Factory Mutual Global's Property Loss Prevention Data Sheets 7-42, "Guidelines for Evaluating the Effects of Vapor Cloud Explosions Using a TNT Equivalency Method," May 2008.

[4] National Transporation Safety Board, "Natural Gas Pipeline Rupture and Fire Near Carlsbad, New Mexico, August 19, 2000," NTSB/PAR-03/01, 2003.

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[14] Office of the Inspector General, U.S. Nuclear Regulatory Commission, "Concerns Pertaining to Gas Transmission Lines at the Indian Point Nuclear Power Plant," Case No. 16-024, February 13, 2020..

[15] National Transportation Safety Board, "Rupture of Florida Gas Transmission Pipeline and Release of Natural Gas, May 4th, 2009," NTSB/PAB-13/01.

[16] K. Mishra and K. Wehrstedt, "Underground gas pipeline explosion and fire: CFD based assessment," *J. Natural Gas Sci. Eng.,* vol. 24, pp. 526-542, 2015.

Appendix A: NUREG/CR-3330 Calculation

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Member of Technical Staff

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NUREG/CR-3330 provides an example calculation of a fire accident scenario for a high-pressure natural gas pipeline. In the sample calculation a discharge from a 36-inch pipeline operating at 1000 psig [A.1]. From 3-1 the average flow rate of 1700 kg/s from the range of 1400-2100 kg/s was applied to the calculation.

Using the equations provided in the NUREG the results can be replicated and applied to the AIM pipeline situation. There are three main steps in calculating the incident heat flux applied to the reinforced concrete safety related structures.

Step 1: Calculate the radiated power (PR), using Equation 3.1
Step 2: Calculate the radius and diameter of the spherical flame
Step 3: Calculate the incident radiation at various distances using Equations 4.1 and 4.2[1]

Applying this methodology to the AIM pipeline the same variable assumptions were made, except for the mass flow rate of the 42-inch pipeline operating at 850 psig. According to the NRC's Review and Confirmatory Analysis the mass flow rate for the pipeline is 1935 kg/s [A.2]. The value was rounded to 1940 kg/s for the sake of this calculation and is referred to as the Nominal Case.

According to Table 3-1 of the NUREG a pipeline of 42-inch diameter would have a mass flow rate between 2000-3200 kg/s. To illustrate the impact of a pipeline of larger mass flow rate on incident heat flux a value of 4000 kg/s was used to calculate the last set of values this referred to as the Bounding Case.

Below in Table A-1 the results of incident heat flux on reinforced safety related concreate structure are shown for distances of 482, 500, 700, 1000, and 1500 meters. The Security Owner Control Area (SOCA) fence is 482 meters away. Buildings that house Emergency Diesel Generators (EDGs) are approximately 700 meters from the pipeline.

[1] For Transmissivity in Step 3, the 20% Relative humidity Curve on Figure 3-2 in NUREG/CR-3330 was used.

Table A-1: Incident Radiation at Various Distances and Mass Flow Rates

Case	Distance (m)	Mass Flow Rate (kg/s)	Radiated Power (kW)	Fire Diameter (m)	Transmissivity	Incident Radiation (kW/m^2)
Sample	482	N/A	N/A	N/A	N/A	N/A
	700	N/A	N/A	N/A	N/A	N/A
	500	1700	4.09E+07	295	0.7	19.6
	1000				0.63	4.6
	1500				0.57	2.0
Nominal	482	1940	4.57E+07	312	0.7	23.6
	500				0.7	22.1
	700				0.65	10.9
	1000				0.63	5.3
	1500				0.57	2.2
Bounding	482	4000	9.61E+07	452	0.7	44.1
	500				0.7	41.5
	700				0.65	21.4
	1000				0.63	10.7
	1500				0.57	4.4

Using the bounding mass flow rate of 4000 kg/s the incident heat flux on safety related structures if located at 482 meters would be 44 kW/m^2. Note that the same parameter assumptions were made as were made in the sample calculation; combustion efficiency, fraction of excess entrained air, and flame temperature may affect the results.

NUREG/CR-3330 states in Table 2-1 that the reinforced safety related structure would last 5 hours with an incident heat flux of 50 kW/m^2 applied. This is based on the criterion 1 which is 'Temperature at the first rebar location does not exceed 177°C (350°F)'. Since the first rebar location does not exceed this temperature, the interior temperature does not exceed this value either.

References

[A.1] U.S. Nuclear Regulatory Commission, NUREG/CR-3330, "Vulnerability of Nuclear Power Plant Structures to Large External Fires", Washington, DC, August 1983.

[A.2] Rao Tammara, US Nuclear Regulatory Commission, "Safety Review and Confirmatory Analysis, Entergy's 10 50.59 Safety Evaluation, Algonquin Incremental Market (AIM) Project, Indian Point Energy Center (IPEC)," October 16, 2014.

From:	Luketa, Anay
To:	Dennis, Suzanne
Subject:	[External_Sender] RE: [EXTERNAL] RE: Additional Information for Consideration
Date:	Tuesday, March 31, 2020 4:39:11 PM

Hi Suzanne,

Thanks for sending this. I think this is confirming that the problem is more complex with regards to the scenarios/causes and that the cloud is not immediately buoyant and can ignite past 1 minute. I think it would be helpful to include reference to the NTSB Florida report and this paper in the report.

-Anay

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Tuesday, March 31, 2020 12:14 PM
To: Luketa, Anay <aluketa@sandia.gov>
Subject: [EXTERNAL] RE: Additional Information for Consideration

Hey Anay,

Here's another paper I found today on underground pipes...thoughts?

https://www.sciencedirect.com/science/article/abs/pii/S1875510015001560

Suzanne

PS: Sorry if I'm overwhelming you!

From: Dennis, Suzanne
Sent: Tuesday, March 31, 2020 9:46 AM
To: Luketa, Anay <aluketa@sandia.gov>
Cc: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: Additional Information for Consideration

Hi Anay,

We found this PHMSA report that states:

Blast, overpressure, shrapnel, and earthquake-type effects resulting from an unintended natural gas or hazardous liquid pipeline release are hazards that can adversely affect humans, property, and the environment. However, these effects are beyond the scope of this study because they occur immediately after the break and RCVs and ASVs, which typically require several minutes to close, cannot mitigate these hazards.

Can you address this ORNL report in your memo?

Thanks!
Suzanne

Suzanne Dennis
Office of Research
U.S. NRC
301-415-0760

From:	Luketa, Anay
To:	Dennis, Suzanne; Mohmand, Jamal Ahmed; LaFleur, Chris
Cc:	Sanborn, Scott Edward
Subject:	[External_Sender] RE: [EXTERNAL] Comments/Clarifications on Draft Report
Date:	Tuesday, March 31, 2020 2:31:36 PM

Hi Suzanne,
See my responses below. -Anay

From: Dennis, Suzanne <Suzanne.Dennis@nrc.gov>
Sent: Monday, March 30, 2020 7:07 PM
To: Luketa, Anay <aluketa@sandia.gov>; Mohmand, Jamal Ahmed <jamohma@sandia.gov>; LaFleur, Chris <aclafle@sandia.gov>
Cc: Sanborn, Scott Edward <sesanbo@sandia.gov>
Subject: [EXTERNAL] Comments/Clarifications on Draft Report

Hi SNL team,

Thanks again for all of your help on this! We are so glad to have your expertise!

On report

- Page 3: "ALOHA is not capable of modeling...congestion" I thought this was an option? Is it not? Please clarify. Added clarification.
- Page 3 states that ALOHA is not appropriate for this kind of application. Can you add a quick description on when ALOHA is appropriate, if at all (like for very bounding applications)? I haven't validated ALOHA so I can't comment on this.
- Page 4 states "yields as high as 50% have been recorded," can you add a reference there? Reference added.
- Under "duration of release on page 5," First sentence needs edit: "The amount of mass used in equation 1 **will determine by** the duration...:" Corrected
- Last sentence, second para, page 6 needs edit: "if it behaves as a dense gas which will greatly **extent** the time" Corrected
- Figure 9: please split into separate figures and note minute represented Will separate Figure 9 with time noted.
- Add foot measurements to Appendix A
- A question I forgot to ask today (or can't remember the question if I did): Do you have an idea of overpressure if ignition occurred within 1-minute after rupture? This would require additional analysis that would not meet the timeline. I would get an estimate using the Sandia shock physics code, CTH.
- If pipe rupture is occurring in a crater, does that change the results? When we talked to accident experts at PHMSA today, they said that typically the super-critical, high mass flow would be expected before the pipe exploded to the surface, but once it pushed through the dirt, it would become buoyant. I'm not sure how I can explain that the flow would no longer be choked. Also, I'm not sure then how to explain the photo in the NTSB Florida report which created a crater, showing a white cloud that indicates condensation of water vapor. And, injury to the officer that walked through a dense cloud indicating that there was enough

oxygen displacement from inhaling the methane to cause health concerns. Can they explain the physics of this, that is, how the flow is no longer choked? If they have data on this can they share this with me?

- Also, our discussion with the PHMSA experts reminded me that we should probably state somewhere that your boundary condition calculation assumed the equivalent of an above-ground break, correct? Added.
- Explosions away from the rupture site or blast impacts at a longer distance than the heat-affected area have not been seen by the PHMSA accident experts, either in accidents or from controlled blowoff valves (which would not have the turbulent effects of two pipe segments facing each other) - anything that could explain why this phenomenon has not been seen in real life? *Steve is going to try and set-up a phone call with the investigator that looked at the Florida rupture to talk about the cloud.* I don't know the statistics on this which is under PHMSA area of expertise. I would think they would be asked if it's impossible to have an unignited release and would have to explain the Florida incident. Also, as I mentioned, I don't know what the potential is for vapors to form from a puncture versus a full-bore release which may have a higher probably of delayed ignition. Maybe Steve can address this as well.
- Jamal – the report currently states: "closest safety-related structure [2320 ft] would be 11 kW/m^2 for a mass flow rate of 1940 kg/s. For a bounding flow rate of 4000 kg/s, the heat flux would be 21 kW/m^2." Can you verify but not add to report.

Let me know if you have any questions about any of these.

We got Steve a copy of the report tonight (he was having trouble accessing BOX), so we might need to meet-up tomorrow if he has any questions. We're hoping to have the draft copy of the whole report to you all by tomorrow. I know it will be a tight turnaround to review (for me too!).

Thanks again,
Suzanne

Suzanne Dennis
Office of Research
U.S. NRC
301-415-0760