

February 9, 2006

Mr. Christopher M. Crane, President  
and Chief Nuclear Officer  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: BRAIDWOOD STATION, UNIT NOS. 1 AND 2 - REQUEST FOR ADDITIONAL  
INFORMATION RE: RESPONSE TO GENERIC LETTER 2004-02,  
"POTENTIAL IMPACT OF DEBRIS BLOCKAGE ON EMERGENCY  
RECIRCULATION DURING DESIGN-BASIS ACCIDENTS AT  
PRESSURIZED-WATER REACTORS" (TAC NOS. MC4667 AND MC4668)

Dear Mr. Crane:

On September 13, 2004, the Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2004-02, "Potential Impact of Debris Blockage on Emergency Recirculation During Design Basis Accidents at Pressurized-Water Reactors," as part of the NRC's efforts to assess the likelihood that the emergency core cooling system (ECCS) and containment spray system (CSS) pumps at domestic pressurized water reactors (PWRs) would experience a debris-induced loss of net positive suction head margin during sump recirculation. The NRC issued this GL to all PWR licensees to request that addressees (1) perform a mechanistic evaluation using an NRC-approved methodology of the potential for the adverse effects of post-accident debris blockage and operation with debris-laden fluids to impede or prevent the recirculation functions of the ECCS and CSS following all postulated accidents for which the recirculation of these systems is required, and (2) implement any plant modifications that the above evaluation identifies as being necessary to ensure system functionality. Addressees were also required to submit information specified in GL 2004-02 to the NRC in accordance with Title 10 of the *Code of Federal Regulations* Section 50.54(f). Additionally, in the GL, the NRC established a schedule for the submittal of the written responses and the completion of any corrective actions identified while complying with the requests in the GL.

By letter dated March 7, 2005, as supplemented by letters dated July 27, 2005 and September 1, 2005, Exelon Generation Company, LLC, provided a response to the GL. The NRC staff is reviewing and evaluating your response along with the responses from all PWR licensees. The NRC staff has determined that responses to the questions in the enclosure to this letter are necessary in order for the staff to complete its review. Please note that the Office of Nuclear Reactor Regulation's Division of Component Integrity is still conducting its initial reviews with respect to coatings. Although some initial coatings questions are included in the enclosure to this letter, the NRC might issue an additional request for information regarding coatings issues in the near future.

C. Crane

-2-

Please provide your response within 60 days from the date of this letter. If you have any questions, please contact me at (301) 415-8371.

Sincerely,

*/RA/*

Mahesh L. Chawla, Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-456 and 50-457

Enclosure:  
Request for Additional Information

cc w/encl: see next page

C. Crane

-2-

Please provide your response within 60 days from the date of this letter. If you have any questions, please contact me at (301) 415-8371.

Sincerely,

*/RA/*

Mahesh L. Chawla, Project Manager  
Plant Licensing Branch III-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-456 and 50-457

Enclosure:  
Request for Additional Information

cc w/encl: see next page

Distribution:

PUBLIC	RArchitzel	JHannon
LPL3-2 Reading File	WBateman	THaffera
RidsNrrDorlLpf	RidsNrrPmJHopkins	JLehning
RidsNrrLADClarke	BSingal, Dorl Dpr	HWagage
RidsNrrPMMChawla	MMurphy	SLu
RidsOgcRp	PKlein	
RidsAcrsAcnwMailCenter	MYoder	
RidsRgn3Mailcenter	MScott	

Accession No.: ML060390357

\*per e-mail

OFFICE	LPL3-2/PM	LPL3-2/LA	DSS/SSIB	DCI/CSGB	LPL3-2/(A)BC
NAME	MChawla	DClarke	DSolorio*	EMurphy*	MLandau
DATE	2/9/06	2/9/06	2/6/06	2/8/06	2/9/06

OFFICIAL RECORD COPY

Braidwood Station Units 1 and 2

cc:

Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission  
Suite 210  
2443 Warrenville Road  
Lisle, IL 60532-4351

Document Control Desk - Licensing  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Mr. Dwain W. Alexander, Project Manager  
Westinghouse Electric Corporation  
Energy Systems Business Unit  
Post Office Box 355  
Pittsburgh, PA 15230

Joseph Gallo  
Gallo & Ross  
1025 Connecticut Ave., NW, Suite 1014  
Washington, DC 20036

Ms. Bridget Little Rorem  
Appleseed Coordinator  
117 N. Linden Street  
Essex, IL 60935

Howard A. Learner  
Environmental Law and Policy  
Center of the Midwest  
35 East Wacker Dr., Suite 1300  
Chicago, IL 60601-2110

U.S. Nuclear Regulatory Commission  
Braidwood Resident Inspectors Office  
35100 S. Rt. 53, Suite 79  
Braceville, IL 60407

Ms. Lorraine Creek  
RR 1, Box 182  
Manteno, IL 60950

Illinois Emergency Management  
Agency  
Division of Disaster Assistance &  
Preparedness  
110 East Adams Street  
Springfield, IL 62701-1109

County Executive  
Will County Office Building  
302 N. Chicago Street  
Joliet, IL 60432

Attorney General  
500 S. Second Street  
Springfield, IL 62701

George L. Edgar  
Morgan, Lewis and Bockius  
1111 Pennsylvania Ave, NW  
Washington, DC 20004

Braidwood Station Plant Manager  
Exelon Generation Company, LLC  
35100 S. Rt. 53, Suite 84  
Braceville, IL 60407-9619

Site Vice President - Braidwood  
Exelon Generation Company, LLC  
35100 S. Rt. 53, Suite 84  
Braceville, IL 60407-9619

Senior Vice President of Operations  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Chairman, Ogle County Board  
Post Office Box 357  
Oregon, IL 61061

Regulatory Assurance Manager - Braidwood  
Exelon Generation Company, LLC  
35100 S. Rt. 53, Suite 84  
Braceville, IL 60407-9619

Director - Licensing and Regulatory Affairs  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Assistant General Counsel  
Exelon Generation Company, LLC  
200 Exelon Way  
Kennett Square, PA 19348

Vice President - Licensing and Regulatory Affairs  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Manager Licensing - Braidwood, Byron and LaSalle  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

## GL 2004-02 RAI Questions

### **Plant Materials**

1. Identify the name and bounding quantity of each insulation material generated by a large-break loss-of-coolant accident (LBLOCA). Include the amount of these materials transported to the containment pool. State any assumptions used to provide this response.
2. Identify the amounts (i.e., surface area) of the following materials that are:
  - (a) submerged in the containment pool following a loss-of-coolant accident (LOCA),
  - (b) in the containment spray zone following a LOCA:
    - aluminum
    - zinc (from galvanized steel and from inorganic zinc coatings)
    - copper
    - carbon steel not coated
    - uncoated concrete

Compare the amounts of these materials in the submerged and spray zones at your plant relative to the scaled amounts of these materials used in the Nuclear Regulatory Commission (NRC) nuclear industry jointly-sponsored Integrated Chemical Effects Tests (ICET) (e.g., 5x the amount of uncoated carbon steel assumed for the ICETs).

3. Identify the amount (surface area) and material (e.g., aluminum) for any scaffolding stored in containment. Indicate the amount, if any, that would be submerged in the containment pool following a LOCA. Clarify if scaffolding material was included in the response to Question 2.
4. Provide the type and amount of any metallic paints or non-stainless steel insulation jacketing (not included in the response to Question 2) that would be either submerged or subjected to containment spray.

### **Containment Pool Chemistry**

5. Provide the expected containment pool pH during the emergency core cooling system (ECCS) recirculation mission time following a LOCA at the beginning of the fuel cycle and at the end of the fuel cycle. Identify any key assumptions.
6. For the ICET environment that is the most similar to your plant conditions, compare the expected containment pool conditions to the ICET conditions for the following items: boron concentration, buffering agent concentration, and pH. Identify any other significant differences between the ICET environment and the expected plant-specific environment.

Enclosure

7. For a LBLOCA, provide the time until ECCS external recirculation initiation and the associated pool temperature and pool volume. Provide estimated pool temperature and pool volume 24 hours after a LBLOCA. Identify the assumptions used for these estimates.

### **Plant-Specific Chemical Effects**

8. Discuss your overall strategy to evaluate potential chemical effects including demonstrating that, with chemical effects considered, there is sufficient net positive suction head (NPSH) margin available during the ECCS mission time. Provide an estimated date with milestones for the completion of all chemical effects evaluations.
9. Identify, if applicable, any plans to remove certain materials from the containment building and/or to make a change from the existing chemicals that buffer containment pool pH following a LOCA.
10. If bench-top testing is being used to inform plant specific head loss testing, indicate how the bench-top test parameters (e.g., buffering agent concentrations, pH, materials, etc.) compare to your plant conditions. Describe your plans for addressing uncertainties related to head loss from chemical effects including, but not limited to, use of chemical surrogates, scaling of sample size and test durations. Discuss how it will be determined that allowances made for chemical effects are conservative.

### **Plant Environment Specific**

11. Provide a detailed description of any testing that has been or will be performed as part of a plant-specific chemical effects assessment. Identify the vendor, if applicable, that will be performing the testing. Identify the environment (e.g., borated water at pH 9, deionized water, tap water) and test temperature for any plant-specific head loss or transport tests. Discuss how any differences between these test environments and your plant containment pool conditions could affect the behavior of chemical surrogates. Discuss the criteria that will be used to demonstrate that chemical surrogates produced for testing (e.g., head loss, flume) behave in a similar manner physically and chemically as in the ICET environment and plant containment pool environment.
12. For your plant-specific environment, provide the maximum projected head loss resulting from chemical effects (a) within the first day following a LOCA, and (b) during the entire ECCS recirculation mission time. If the response to this question will be based on testing that is either planned or in progress, provide an estimated date for providing this information to the NRC.

### **ICET 1 and ICET 5 Plants**

13. Results from the ICET #1 environment and the ICET #5 environment showed chemical products appeared to form as the test solution cooled from the constant 140 °F test

temperature. Discuss how these results are being considered in your evaluation of chemical effects and downstream effects.

**Trisodium Phosphate (TSP) Plants**

- 14. (Not Applicable).
- 15. (Not Applicable).
- 16. (Not Applicable).

**Additional Non-Coatings Questions**

- 17. (Not Applicable).
- 18. (Not Applicable).
- 19. (Not Applicable).
- 20. (Not Applicable).
- 21. (Not Applicable).
- 22. (Not Applicable).
- 23. (Not Applicable).
- 24. (Not Applicable).

**Coatings**

Generic - All Plants

- 25. Describe how your coatings assessment was used to identify degraded qualified/acceptable coatings and determine the amount of debris that will result from these coatings. This should include how the assessment technique(s) demonstrates that qualified/acceptable coatings remain in compliance with plant licensing requirements for design-basis accident (DBA) performance. If current examination techniques cannot demonstrate the coatings' ability to meet plant licensing requirements for DBA performance, licensees should describe an augmented testing and inspection program that provides assurance that the qualified/acceptable coatings continue to meet DBA performance requirements. Alternatively, assume all containment coatings fail and describe the potential for this debris to transport to the sump.

Plant Specific

26. (Not Applicable).
27. (Not Applicable).
28. (Not Applicable).
29. (Not Applicable).
30. The NRC staff's safety evaluation (SE) addresses two distinct scenarios for formation of a fiber bed on the sump screen surface. For a thin bed case, the SE states that all coatings debris should be treated as particulate and assumes 100% transport to the sump screen. For the case in which no thin bed is formed, the staff's SE states that the coatings debris should be sized based on plant-specific analyses for debris generated from within the ZOI and from outside the ZOI, or that a default chip size equivalent to the area of the sump screen openings should be used (Section 3.4.3.6). Describe how your coatings debris characteristics are modeled to account for your plant-specific fiber bed (i.e. thin bed or no thin bed). If your analysis considers both a thin bed and a non-thin bed case, discuss the coatings debris characteristics assumed for each case. If your analysis deviates from the coatings debris characteristics described in the staff-approved methodology, provide justification to support your assumptions.
31. Your submittal did not provide details regarding the characterization of latent debris found in your containment as outlined in the NRC SE. Please provide these details.
32. Was/will "leak before break" be used to analyze the potential jet impingement loads on the new ECCS sump screen?
33. You indicated that you would be evaluating downstream effects in accordance with WCAP 16406-P. The NRC is currently involved in discussions with the Westinghouse Owner's Group (WOG) to address questions/concerns regarding this WCAP on a generic basis, and some of these discussions may resolve issues related to your particular station. The following issues have the potential for generic resolution; however, if a generic resolution cannot be obtained, plant-specific resolution will be required. As such, formal RAIs will not be issued on these topics at this time, but may be needed in the future. It is expected that your final evaluation response will specifically address those portions of the WCAP used, their applicability, and exceptions taken to the WCAP. For your information, topics under ongoing discussion include:
  - ee. Wear rates of pump-wetted materials and the effect of wear on component operation
  - ff. Settling of debris in low flow areas downstream of the strainer or credit for filtering leading to a change in fluid composition
  - gg. Volume of debris injected into the reactor vessel and core region
  - hh. Debris types and properties
  - ii. Contribution of in-vessel velocity profile to the formation of a debris bed or clog
  - jj. Fluid and metal component temperature impact

- kk. Gravitational and temperature gradients
  - ll. Debris and boron precipitation effects
  - mm. ECCS injection paths
  - nn. Core bypass design features
  - oo. Radiation and chemical considerations
  - pp. Debris adhesion to solid surfaces
  - qq. Thermodynamic properties of coolant
34. Your response to GL 2004-02 question (d) (viii) indicated that an active strainer design will not be used, but does not mention any consideration of any other active approaches (i.e., backflushing). Was an active approach considered as a potential strategy or backup for addressing any issues?
35. The NRC staff's SE discusses a "systematic approach" to the break selection process where an initial break location is selected at a convenient location (such as the terminal end of the piping) and break locations would be evaluated at 5 foot intervals in order to evaluate all break locations. For each break location, all phases of the accident scenario are evaluated. It is not clear that you have applied such an approach. Please discuss how the limiting break locations listed as being evaluated in your GL response were selected.
36. Were secondary side breaks (e.g., main steam, feedwater) considered in the break selection analyses? Would these breaks rely on ECCS sump recirculation?
37. You stated that an alternate break was evaluated at the 14-inch pressurizer surge line at the connection to the pressurizer. Please discuss the purpose for analyzing an alternate break size. Do you intend to apply the SE Section 6 methodology?
38. You stated that the ZOI for reflective metallic insulation (RMI) and fibrous Transco thermal wrap were applied using the criteria established in the NRC SE, Table 3-2. This table of the SE does not provide a ZOI value for thermal wrap. Please provide the the value used and the technical justification for this value.
39. You stated that the containment walkdowns for Byron Unit 2 and Braidwood Unit 1 will be completed in accordance with Nuclear Energy Institute (NEI) 02-01 during the Fall 2005 and Spring 2006 outages, respectively. The licensee also states that detailed analyses have already been completed in the areas of debris generation, transport and head loss. Please discuss the plans to incorporate the results of these future containment walkdowns into these analyses.
40. The September 2005 response to GL 2004-02 indicated that the proposed replacement strainer area might range from between 1800 - 3700 ft<sup>2</sup>. Please provide a more precise estimate of strainer area.

41. The September 2005 response to GL 2004-02 identified the possible existence of drainage paths that bypass the strainer. Please confirm whether such paths exist. If such paths are present, dependent upon the containment pool height and strainer and sump geometries, they could prevent a water seal over the entire strainer surface from ever forming; or else this seal could be lost once the head loss across the debris bed exceeds a certain criterion, such as the submergence depth of the vent line or penetration. According to Appendix A to Regulatory Guide 1.82, Revision 3, without a water seal across the entire strainer surface, the strainer should not be considered to be "fully submerged." Therefore, if applicable, what sump strainer failure criteria are being applied for the "vented sump" scenario described above.
42. Has debris settling upstream of the sump strainer (i.e., the near-field effect) been credited or will it be credited in testing used to support the sizing or analytical design basis of the proposed replacement strainers? In the case that settling was credited for either of these purposes, estimate the fraction of debris that settled and describe the analyses that were performed to correlate the scaled flow conditions and any surrogate debris in the test flume with the actual flow conditions and debris types in the plant's containment pool.
43. What is the basis for concluding that the refueling cavity drain(s) would not become blocked with debris? What are the potential types and characteristics of debris that could reach these drains? In particular, could large pieces of debris be blown into the upper containment by pipe breaks occurring in the lower containment, and subsequently drop into the cavity? In the case that large pieces of debris could reach the cavity, are trash racks or interceptors present to prevent drain blockage? In the case that partial/total blockage of the drains might occur, do water hold-up calculations used in the computation of NPSH margin account for the lost or held-up water resulting from debris blockage?
44. What is the minimum strainer submergence during the postulated LOCA? At the time that the re-circulation starts, most of the strainer surface is expected to be clean, and the strainer surface close to the pump suction line may experience higher fluid flow than the rest of the strainer. Has any analysis been done to evaluate the possibility of vortex formation close to the pump suction line and possible air ingestion into the ECCS pumps? In addition, has any analysis or test been performed to evaluate the possible accumulation of buoyant debris on top of the strainer, which may cause the formation of an air flow path directly through the strainer surface and reduce the effectiveness of the strainer?